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**Problems of Cohesion? Multiculturalism and Migrants' Claims-Making  
for Group Demands in Britain and the Netherlands<sup>1</sup>**

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**Abstract**

This article addresses the relationship between migrants' group demands, and a state's policies for politically accommodating the cultural and religious difference of migrants, by asking whether this leads to problems of societal cohesion. The empirical research compares political claims-making by migrants for group specific demands in Britain and the Netherlands, which both –albeit in different ways and to different degrees- grant recognition to the cultural difference of migrants within their national political self-understandings. Overall the scale of group demands found is very modest in both countries, which indicates the limited 'threat' of group demands to societies. However, migrants' group demands turn out to be significant for Muslims. Closer qualitative analysis reveals problems in the more overtly multicultural Dutch approach as well as the more restrictive British one. This suggests that there is no easy blueprint solution for multiculturalism, especially with respect to Islam, whose public nature makes it especially resistant to political adaptation.

Keywords: Multiculturalism, Islam, Group Rights, Claims-making, Muslims

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# Problems of Cohesion? Multiculturalism and Migrants' Claims-Making for Group Demands in Britain and the Netherlands

## Introduction

A few years ago, it appeared to some authors that Western liberal democracies that would push decisively for policies that deliberately and explicitly recognised and protected migrants as distinct ethnic groups (e.g., Kymlicka 1995, Parekh 2000). However, in the new millennium, after the 9/11 atrocity and a fractious Gulf War, the mantra 'we are all multiculturalists now' (Glazer 1997) has less salience both as normative rhetoric and as a policy option. Such shifts away from multiculturalism were arguably already in place. The most overt European experiment in multicultural policies, the Dutch had already switched from special policies for migrant groups to policies for individual migrants within society (Entzinger 2003). Similar changes were also discernible in Sweden (Soininen 1999), and in Britain, where republican-style citizenship rituals and the principle of 'community cohesion' have been introduced into recent policies (Statham 2003). Instead of celebrating diversity, assimilative cultural demands –language skills, knowledge of national culture, citizenship rituals– are the requirements for migrants in the new policy thinking.

In the sizeable theoretical literature on the subject, there has been a strong preoccupation with the position of ethnic minorities and the –beneficial or harmful– effects of 'multiculturalism', the extension of cultural group recognition and rights to ethnic minorities (e.g., Taylor 1992, Habermas 1994). At stake in these discussions is the nation-state's capacity for maintaining social cohesion as well as the liberal conception of individual rights on which it rests. Problems are seen to arise from the increasing demands that are put forward by migrant minorities for special group rights, recognition, exemption from duties, and support from the state for their cultural identities. These group demands challenge the concept of a unified, undifferentiated citizenship, a development that is viewed by supporters of multiculturalism (e.g., Parekh 1996, Young 1998) as a healthy antidote against the prevalent 'white' cultural hegemony, and by opponents (e.g., Schlesinger 1992, Huntington 1996) as a serious assault on the shared communal values and solidarity necessary for social cohesion and integration.

In contrast to the many normative contributions (e.g., Bauböck 1994, Spinner 1994, Philips 1995, Kymlicka and Norman 2000), in this article we address the challenge of migrants' group demands to social cohesion empirically, by examining original data on the claims-making of minorities of migrant origin<sup>2</sup> in Britain and the Netherlands. Britain and the Netherlands are suited for comparison as different European variants of multiculturalism, with roughly similar proportions –between 7.5% and 10%-- of migrants and their descendants in their populations, from similar waves of migration. Although their migrant stocks come partly

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<sup>2</sup> Our empirical enquiry is limited to minorities of immigrant origin. It thus excludes other ethnocultural minorities, and specifically national ethnic minorities, indigenous peoples and the descendants of forced migrants, such as black African Americans in the USA, whose cases are also much discussed in the literature, but which produce different types of claims and political responses than those by resident minorities of migrant origin. Regarding terminology, throughout the text we shall use 'migrants' to cover all minorities of immigrant origin, regardless of the length of their residence, citizenship status, or national or ethnic origin.

from similar and partly from different regions of origin –Britain: the Caribbean and Indian subcontinent; Netherlands: Indonesia, the Caribbean, Morocco and Turkey— they have significant Muslim communities, making up about 3.5%-5%, who are central to debates about group demands. Our original data set on claims-making is drawn from a sample covering 1992-1998. This allows us to compare the impact of Dutch multicultural policies, before they became less facilitating for group demands, with those in Britain which have always maintained a more restrictive cultural pluralism. Thus we can examine the challenge of group rights in relation to the policies which facilitated them, when assessing whether they contribute to cohesion.

First we discuss the challenge of group demands, before giving details on the policy approaches of Britain and the Netherlands. After briefly outlining our method, we then make an overview of claims-making for group demands in the two countries, before undertaking a qualitative analysis of those by Muslims.

### **The Challenge of Migrants' Group Demands**

Others have used the terms 'multiculturalism' or 'differentiated citizenship' to refer to migrants' particularist group demands. Because we use the term 'multiculturalism' for a policy approach, we refer to 'group demands'. 'Group demands' is an umbrella term for the political field of claims by migrants for group specific rights, recognition, and exemptions from duties, with respect to the cultural requirements of citizenship in their societies of settlement. Although this category is heterogeneous, all group demands share two features: firstly, they are demands that go beyond the set of common civil and political rights of individual citizenship which are protected in all liberal democracies; and secondly, they are demands that if realised, constitute the recognition and accommodation by the state of the distinctive identities and needs of migrant groups.

Regarding the challenge of group demands, a first point to make is that the idea of a unitary citizenship based on equal individual rights, on which liberalism rests, is an ideology and not an accurate depiction of reality for the typical liberal nation-state. Most nation-states attribute some group rights in the form of corporatist or federal arrangements, and most nation-states give preferential treatment to specific religions over others. Thus in Britain, the historical accommodation of church and state has left the Monarch both Head of State and Head of the Church of England. Religious institutions receive no direct state support, but the state privileges its own religion within its understanding of politics, for example, with Church of England Bishops sitting in the second chamber, the House of Lords, which is not the case for other denominations.

Another important point is that although controversies over group demands are often played out in the public domain through symbols, such as headscarves and minarets, they are about the distribution of material resources. For example, in Germany, a 'Church tax' is levied on the individual employee and channelled to Christian or Jewish religious institutions recognised by the state. If Turkish migrants were allowed to contribute to their own faith denomination, which they are not, this would bring not only symbolic recognition, but significant tax revenues to Islamic organisations (Laurence 2001). This example demonstrates

that many cultural group demands are not just about value conflicts, but about material stakes in society. Cultural demands that are made by migrants in policy fields such as public education or welfare, where the state has responsibilities for providing and distributing services, present challenges to a pre-existing institutionalised context of procedure in which the native ‘white’ population also has defined stakes.

Although some group demands by migrants are for ‘parity’ of treatment with other religious and ethnic groups, others go further requesting special or ‘exceptional’ treatment for the group relative to other members of society. Some exceptional demands are easily accommodated by liberal states. Indeed for the case of reparations for Nazi crimes in the Holocaust, the German state has itself promoted preferential treatment for the associational activities of Jews and Roma. However, some other migrants’ exceptional demands are less easy to accommodate, because they actually challenge the very essence of liberal values. For example, Muslim migrants wishing to practice polygamy, female circumcision, or *sharia* divorce, would be committing acts that contradict most liberal states’ legal and moral understandings of equality, between individuals, and men and women. How common or representative of group demands such cases are, is an empirical question. We suspect that many migrants’ to Europe are likely to adhere to more secular or modern understandings of Islamic practice, or that such practices would diminish overtime, which would make such cases atypical rather than the norm.

A last point concerns the native publics of the host society. Native publics and their liberal intellectuals often come to see themselves as the defenders and upholders of the ‘myth’ of a unitary national citizenship. However sincere such allegiances to liberal principles may be, it is also the case that their proponents may be wedded to a version of those concepts that in the post-immigration era is an historical anachronism, or alternatively, based on nostalgia for the nation’s past. In cases such as Rushdie in Britain, or the headscarf affairs in France, public discourse dynamics tend to take over and the actual problems become distorted under a barrage of rhetoric about national values and identity. Thus the importance of the challenge of group demands may be distorted in the public imagination.

After outlining the challenge of group demands, we now turn to the policy traditions for accommodating cultural and religious difference which have emerged in Britain and the Netherlands.

### **Britain and the Netherlands: Two Variants of Multiculturalism**

In recent years, a number of scholars have conceptualised the citizenship configurations of different nation-states as policy approaches that are the explanatory variable for migrant incorporation (e.g., Joppke 1996, 1999, Safran 1997, Favell 1998, Guiraudon 1998, Ireland 2000, Koopmans and Statham 2000, 2003). Typically, these authors distinguish between two important dimensions of citizenship that determine the degree and form of inclusiveness/exclusiveness of a national approach: firstly, the criteria for formal access to citizenship; and secondly, the cultural obligations that this access to citizenship entails.

Regarding the first dimension of citizenship, Britain and the Netherlands have a civic territorial basis for citizenship acquisition. This has made it relatively easy for migrants to gain access to formal civic rights, through *ius soli* at birth and naturalisation, when compared to countries such as Germany and Switzerland, where access to the political community has been based on preconditions that the candidate assimilate to the cultural requirements of the host country. However, Britain and the Netherlands also differ from those countries such as France, where the state grants relatively easy access to formal citizenship, but in doing so, is highly resistant to recognizing the existence of ethno-cultural groups and enforces a strict separation of state and church. In contrast to France's imposition of a unitary mode of conduct for citizens in the public sphere, the multicultural approaches of Britain and the Netherlands do not make such access conditional upon assimilation, and new citizens are allowed to retain aspects of their cultural identities, and express them, and their interests, in the public sphere, including core institutions, such as schools, the military, and the media.

We now look briefly at some aspects of these country's respective approaches.<sup>3</sup> In addition to comparing integration policies, we also consider church/state relations and the resultant political space for migrant religions. This is an important factor defining a state's approach for politically accommodating the cultural difference of migrants, which has previously tended to be overlooked in the literature, or subsumed under migrant policies.

In Britain, migrant organisation and political participation is facilitated by the state for ethnic or racial minorities. A state-sponsored 'race relations' industry has emerged backed by anti-discrimination legislation and the authority of the Commission for Racial Equality and local bodies to report on practices for ensuring equal treatment, especially in the labour market. It is worth emphasizing that British political élites adopted 'race' as a category when attempting to address the disadvantage of minority populations caused by discrimination. This 'racialization' of policies in part reflected the fear of political élites that British 'race riots' might escalate to the crisis point of those experienced in the United States in the 1960s. An outcome of this approach is that policies were more tailored to the integration of Afro-Caribbeans under the generic umbrella term 'black', than the relatively later inflows of migrants from the Indian sub-continent (Hiro 1991). Race Relations politics has been extended to Indians, Pakistanis and Bangladeshis under the generic term 'Asian', which implies that groups with a self-identification that is non-racial, the prime example being Muslims, have been served relatively less well by the institutional apparatus (Modood 1988, Statham 1999). Another point worth making is that the constituency-based electoral system has provided the large concentrations of migrant communities in specific regions with a considerable resource-base of voting power for influencing their Members of Parliament. This has in turn led political parties to take up issues relating to ethnic minorities. At the local level of politics, migrants have made a considerable impact (Solomos and Back 1995, Garbaye 2000).

Religious institutions receive no direct state support, and the role of religion in public institutions is relegated to a matter of private individual conscience, but the British state does privilege its own Anglican religion within its understanding of politics. More than twenty

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<sup>3</sup> More substantive overviews can be found in Hiro (1991) and Blackstone, Parekh and Saunders (1998) for Britain; and Rath et al. (1999) and Duyvené de Wit and Koopmans (2001), for the Netherlands.

Anglican bishops sit in the second chamber, the House of Lords, and the Church of England, headed by the Monarch, stands as the official national religion. The limit which British law sets in extending rights to migrant religions was most clearly demonstrated by the ruling in the Rushdie Affair that blasphemy did not extend to Islam.<sup>4</sup> A key feature of the Race Relations legislation is that it basically attributes rights to secular and not religious groups of minorities. Although Britain has special laws with regard to racial discrimination, there are no parallel laws that make religious discrimination a crime.<sup>5</sup> Furthermore, several ruling interpretations of the 1976 Race Relations Act have steadfastly refused to extend group rights against discrimination to Muslims, although two ethno-religious groups, Sikhs and Jews, have been legally considered 'ethnic' groups since 1983.<sup>6</sup> Thus even when the Commission for Racial Equality brought a case against an engineering firm which refused to employ Muslims because it saw them as 'extremists' in 1991, the employer was found guilty only of 'indirect discrimination' against the racial category 'Asians' and his anti-Muslim sentiments went legally unpunished (Vertovec 1996: 177, Lewis 2002: 250). In some ways reminiscent of France, British multiracialism has been far from reticent in opposing the extension of group rights to Muslims. The state has only recently allowed state funding for a few Islamic 'faith schools', which Anglican, Catholic and Jewish denominations have enjoyed for many years. In response there has been a concerted campaign by British Muslims and Race Relations campaigners to coin the phrase 'Islamophobia' as a specific form of 'racism'.<sup>7</sup>

The Netherlands recognized relatively early that many 'guestworker' migrants would remain, and reacted through the inclusive *Minderhedennota* (minorities policy) of 1983, which stated that, 'Achieving a society in which all members of minority groups in the Netherlands, individually and also as groups, are in a situation of equality and have full opportunities for their development', or in short a policy objective of 'integration with retention of own culture' (Entzinger 2003: 63). Importantly, for our discussion of group rights, Dutch policies perceived migrants in terms of their group membership and not primarily as individuals. Following the Dutch tradition of institutionalised pluralism 'pillarization' (*verzuiling*) (Lijphart 1975), the government's policies provided for a large degree of autonomy for 'ethnic minorities' in the cultural sphere, and incorporated minority elites into politics by subsidizing representative organizations and their inclusion in the policy deliberation and implementation processes. In the Netherlands, the state even went as far as opening up civil service positions and local voting rights to foreign residents. Thus in contrast to Britain,

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<sup>4</sup> A case of blasphemy against Christianity had been successfully prosecuted as recently as 1979, against a poem asserting that Christ was a homosexual. The failure of the blasphemy cases against Rushdie were therefore not due to the secularisation rendering 'blasphemy law' archaic.

<sup>5</sup> Such laws with respect to religious discrimination are in force only in Northern Ireland in an attempt to combat the local conflicts along confessional lines between Protestants and Catholics. In 2001, the crime of 'incitement to religious hatred' was bolted onto the statute book parallel to the already existing crime of 'incitement to racial hatred'. This shows that the state is slowly acknowledging some degree of recognition for religion within Race Relations, but not yet in the direct way it does for race/ethnicity.

<sup>6</sup> In *Mandla v. Dowell-Lee* 1983 a head teacher's refusal to allow a Sikh boy to wear a turban in school was successfully challenged under the Race Relations Act and it was established that Sikhs and by extension Jews were 'ethnic' groups.

<sup>7</sup> This framing is interesting because it tries to include Islam as a category within the Race Relations framework, by conflating the secular status of racial minority with that of a religious faith group. See, for example, the reports by the Runnymede Trust on 'Islamophobia' (1997) and the Parekh report on 'The Future of Multi-Ethnic Britain' (2000).

Dutch cultural pluralism did not provide a ‘racialised’ straightjacket for minority identities. Instead the Dutch elites considered that integration is most likely to be accomplished through confident subcultures, which makes the preservation of minority cultures an essential part of their incorporation. In the 1990s, Dutch minority policy moved away from this idealist undiluted multiculturalism and toward a more British-style focus on socio-economic parity, when the realism set in that maintaining group diversity could also mean structuring disadvantage for those groups. Nonetheless, the Dutch approach still retains important distinctive characteristics with the result that it offers a wider and deeper range of cultural opportunities for minority groups than Britain, which is important, because it encouraged the preservation of a wide range of homeland, national and ethnic identities. The ‘pillarised’ system of consociational politics has the tradition for delegating state prerogatives to religious communities. As a result, religious group rights extend much further than those granted in Britain, so that, for example, religious groups have the legal right to government funding for their schools. The policy traces of Dutch-style multiculturalism *avant la lettre* remain. Thus we find a state funded Islamic broadcasting network (*Moslim-omroep*), an Islamic school board, an Islamic pedagogic centre, and more than forty Islamic schools, which are fully government funded with a regular Dutch curriculum. Just as the ‘old’ Christian and Protestant pillars had their own state-sponsored semi-autonomous institutions in education, health, welfare and the public media, such rights could not be denied to the new cultural and religious minorities. Even though the Dutch state retreated from this ‘pure’ multiculturalism, in comparison to Britain, it still serves as the case for a more facilitating approach to accommodating group demands, especially as our data covers the period 1992-8, when the more radical multicultural policy was still in place.

### **Data collection**

To investigate the political claims-making of migrants in Britain and the Netherlands, we use data drawn from content analyses of daily newspapers in the two countries. In contrast to many media content analyses, we are not primarily interested in the way in which the media frame events. On the contrary, our focus is on the news coverage of mobilisation, public statements and other forms of claims-making by non-media actors. Taking a cue from ‘protest event analysis’ in the study of social movements (Tarrow 1989, Olzak 1989, Rucht, Koopmans, and Neidhardt 1998), the units of analysis are not articles, but individual instances of claims-making (Koopmans and Statham 1999). Instances of claims-making have been included irrespective of their form, and range from violent attacks on other groups, public demonstrations and legal action, to public statements.

Acts were included in the data if they involved demands, criticisms, or proposals related to the regulation or evaluation of immigration, minority integration, or xenophobia. Because of our special interest in migrant claims-making, we included acts by resident minorities of migrant origin, even if they were not related to these issues, provided, of course, that they involved some political claim. Regarding territorial criteria we included all acts in Britain and the Netherlands, respectively. There are obviously limitations to our data. The data-set excludes claims-making outside the public sphere (e.g., insider lobbying), as well as claims-making in partial public spheres (e.g., claims directed at school boards by parents, or purely local issues). However, it should be pointed out that once such claims become controversial,

they too tend eventually to be reported in the nationwide press, and would then be picked up by our sources.

For the comparative analysis here, we use data drawn from every second issue (Monday, Wednesday, Friday) of *The Guardian* for Britain, and the *NRC/Handelsblad* for the Netherlands.<sup>8</sup> These papers were chosen because they are of a comparable, moderately left-liberal political affiliation, and because, compared to other national quality newspapers, they have the most encompassing coverage of the specific issues of interest. The data cover the same periods in the four countries: 1992-1998. When using newspapers as a source one has to deal with the problem of selection –not all events that occur receive coverage– and description bias – events may get covered in a distorted way (McCarthy et al. 1996). We have tried to minimize the problem of description bias by explicitly basing the coding only on the factual coverage of statements and events in newspaper articles, and leaving out any comments and evaluations made by reporters or editors. In any case, quality newspapers have to protect their reputation and cannot afford to quote claims patently incorrectly. Since our interest here lies with *public* claims-making, the problem of selection bias is less aggravating here than in some other contexts, because acts of claims-making become relevant –and potentially controversial– only when they reach the public sphere.

### **The Overall Picture of Claims-making for Group Demands**

A first empirical question to address is the extent of migrants’ claims-making for group demands. Table 1 shows cases where the substantive focus of migrant claims-making is for group demands relating to cultural or religious difference.

**Table 1:  
The Proportion of Claims-making for Group Demands in  
The Netherlands and Britain, 1992-8.**

| (%)   | Netherlands | Britain |
|---|-------------|---------|
| <b>Migrants’ claims for group demands /All claims-making on immigration and ethnic relations politics</b> | 2.0%        | 3.4%    |
| <b>All claims about group demands/ All claims-making in immigration and ethnic relations</b>              | 5.5%        | 7.7%    |

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<sup>8</sup> Data were coded from microfilm and CD-ROM versions of the newspapers by trained coding assistants on the basis of a standardized codebook. All articles in the home news section of the newspapers were checked for relevant acts, i.e. the search was not limited to articles containing certain key words. For the main variables in the analysis (actors, addressees, aims, etc.) open category lists were used, which allow us to retain the detail of the original reports in the analysis. In addition, hard copies of the original articles were kept to allow us to go back to the original reports if information was needed that had not been captured by the variables and categories included in the codebook (codebooks are available from the authors on request). The use of very detailed open category systems including hundreds of different actors and claims entails that conventional measures of inter-coder reliability are not applicable to these variables. Anyway, the categorizations used in the present analyses are not based on coder decisions, but are the result of aggregations of raw codes by the authors (for a similar two-stage procedure of content analysis, see Shapiro and Markoff 1998, pp. 73ff., 199ff).

|   |       |       |
|---|-------|-------|
| N   | 2,286 | 1,313 |
| <b>Migrants' claims for group demands /All migrants' claims-making on immigration and ethnic relations politics</b> | 20.8% | 17.1% |
| N   | 216   | 258   |

First we see that, quantitatively, migrants' group demands constitute a very small proportion of all claims made on immigration and ethnic relations politics, accounting for 2.0% in the Netherlands and 3.4% in Britain. Such an empirical finding is difficult to tally with the impression given by much of the literature about multiculturalism, that migrants' claims-making for group demands presents a fundamental challenge to the integrative capacity of the liberal nation-state. Even when we include the claims by non-migrant collective actors about group demands, the proportion of this type of claims-making remains very modest: Netherlands 5.5% and Britain 7.7%.

Surprisingly, we also find from Table 1, a slightly higher level of group demands in Britain, the weaker variant of multicultural policies, when compared to the Netherlands. This goes against our expectation that the stronger variant of multiculturalism in the Netherlands would have encouraged more group demands, and shows that there are some limits to policy approaches' ability to shape migrants' behaviour.

**Table 2:**  
**Collective Identities used by Migrants in Claims-making for Group Demands.**  
**The Netherlands and Britain, 1992-8.**

|                                       | <b>Netherlands</b> | <b>Britain</b> |
|---------------------------------------|--------------------|----------------|
| <b>Policy-status identities</b>       | <b>15.6</b>        | <b>4.6</b>     |
| Foreigners                            | 8.9                | -              |
| Minorities/allochthonen               | 4.4                | 4.6            |
| Immigrants                            | 2.2                | -              |
| <b>Racial identities</b>              | <b>2.2</b>         | <b>22.7</b>    |
| Black                                 | -                  | 18.2           |
| Asian                                 | -                  | 2.3            |
| Other                                 | 2.2                | 2.3            |
| <b>Religious identities</b>           | <b>60.0</b>        | <b>65.9</b>    |
| Muslim                                | 46.7               | 61.4           |
| Hindu                                 | 6.7                | 2.3            |
| Rastafarian                           | 2.2                | 2.3            |
| Other                                 | 4.4                | -              |
| <b>Ethno-religious identities</b>     | <b>2.2</b>         | <b>6.8</b>     |
| Jewish                                | 2.2                | 6.8            |
| <b>Ethnic and national identities</b> | <b>31.1</b>        | <b>0.0</b>     |
| Sinti and Roma                        | 2.2                | -              |
| Turkish                               | 15.6               | -              |
| Chinese                               | 2.2                | -              |
| Mollucan                              | 2.2                | -              |
| Morocco                               | 6.7                | -              |
| Other African                         | 2.2                | -              |
| Surinamese                            | 2.2                | -              |

|  |              |              |
|--|--------------|--------------|
| <b>Hyphenated identification with country of residence</b> | <b>2.2</b>   | <b>9.1</b>   |
| <b>Sum total</b>   | <b>111.1</b> | <b>109.1</b> |
| N=   | 45           | 44           |

In Table 2, we examine the collective identities which migrants used for making group demands. Migrants may use at least four types of collective identities, drawn from identification with: the status categories of integration policies, e.g., as ‘ethnic minorities’; with a ‘racial’ group, e.g., as ‘black’; their religion, e.g., as Hindu; or lastly with their ethnicity, or nationality of their country of origin, as Roma or Turks. A fifth type of identity is the hybrid of ethno-religious groups, for groups such as Jews and Sikhs, for whom religion and ethnicity are indistinguishable. In addition, each of these identities may be used in a way that is a hyphenated with the country of residence, such as the *British Muslim Action Front*. These possible identifications overlap and are to an important degree in competition with each other. The same group of migrants may mobilise collective claims as ‘Pakistanis’, ‘Asians’ (the categorisation from British Race Relations policies for Indian Subcontinent migrants), ‘Muslims’, or as ‘ethnic minorities’, and as ‘British Asians’ or ‘British Muslims’. The actual collective identities which migrant groups use for entering the public domain is a strategic dimension of their claims-making.

Table 2 shows the type of collective identities expressed by migrants when making group demands in the Netherlands and Britain.<sup>9</sup> The most striking feature is that more than six tenths of these migrant group demands were made using religious forms of identification in the Netherlands (60.0%), and two thirds in Britain (65.9%). This is what we would expect in the Netherlands which facilitates religious group identities within its minority politics, but runs counter to our expectations for Britain where such identities are excluded from the Race Relations framework (with the exceptions of the ethno-religions Judaism and Sikhism).

In addition, we see that the vast majority of these group demands were made by migrants identifying themselves as ‘Muslim’ (Netherlands 46.7%, Britain 61.4%). Again this especially surprising for Britain, which excludes Islam and sponsors the ‘Asian’ identity for Indian Subcontinent minorities, and once more points to the limitation of state policies in shaping migrants’ behaviour.

Another finding is the low number of group demands made by other migrant faith groups, when compared to Muslims. Although both countries have significant migrant populations of Hindu faith, who face exactly the same multicultural and state/religion policies as Muslims, there is little evidence for Hindus making group demands using religious identities (Netherlands 6.7%; Britain 2.3%). Likewise, the ethno-religious group, Jews, actually

<sup>9</sup> We measure collective identities by the way in which migrant collective actors are described in our newspaper sources. Names of organisations are important vehicles for the self-presentation of groups toward both their constituency, and the wider society, and therefore may be considered good indicators of the group’s collective identity. In addition, we allow for the possibility for composite identities, by coding multiple identities. Thus the *Turks-Islamitische Culturele Federatie* receives two identity codes ‘Turkish’ and ‘Muslim’. This double-counting explains why the figures are greater than 100% in the sum total row.

mobilise less in the group demands field than they do overall. Jews make 2.2% of group demands in the Netherlands and 6.8% in Britain, whilst they account for 8.1% of all claims-making by Dutch migrants and 5.5% by British migrants, respectively. This low presence of group demands in the claims-making repertoires of Jews stands in sharp contrast to Muslims, for whom between four tenths and two thirds of all claims-making was for group demands (Netherlands 50.0%, Britain 67.5%).

With respect to the difference between Jews and Muslims, one can point to the much longer history of political accommodation of Jews within Western European societies. In addition, the vast majority of Jews practise their faith, if at all, to the same limited extent as the vast majority of nominal Christians. Such factors may explain why Jews make few group demands relative to Muslims. However, such differences do not hold for Hindus, who came in the same waves of migration, from the same regions, and who have received similar levels of political and religious accommodation as Muslims. Although Hinduism in some of its manifestations can promote values that are equally as incommensurable to liberal democratic values as Islam, Hindu group demands are largely invisible in the public domain.

We consider that the relatively low level of Hindu group demands compared to Muslims is a result of the different infrastructures of the two religions in their societies of settlement. Islam is a more collective and public religion centred on the Mosque, whereas there are many different types of Hinduism, traceable in part to regional or caste differences, and the home is often the principal location for worship in a religion which demands few public celebrations (Hiro 1991, Rex and Tomlinson 1983, Poulter 1998). As a non-proselytising de-centralised religion that is practised privately, Hinduism has fitted more easily as a new minority religion within the political space granted to religions. In addition, Hindu Temples have not taken on the same functions for the migrant community of service provision and negotiating at the interface with the host political authorities that the Mosque has for Muslims.

In sum, our findings here indicate important group-specific differences between religious minorities, and toward an especially high propensity of group demands by Muslims. The key finding is that regardless of the differences in national contexts for attributing group rights, it is principally only Muslims who make group demands. We argue that this finding provides strong suggestive evidence that there is something about the relationship between liberal states and their Muslim migrants, which leads to group demands. On one side, it could be that there is something specific about the political position of Muslims in their societies of settlement, which leads to claims-making for group demands, independently of national context. Here, we hypothesise that *it is the public nature of the Islamic religion and the demands that it makes on the way that followers conduct their public lives, which makes Islam an especially resistant type of identity, and which results in claims-making for group demands*. On the other, it could be that there is something specific in the way that liberal democratic states attempt to accommodate their Muslims, which leads to group demands. Here, we hypothesise that *there are specific deficits in liberal states' cultural provision for migrant and religious group needs which impact disproportionately on groups who are practising Muslims*. In order to investigate these questions, empirically and cross-nationally, we now undertake a detailed qualitative analysis of Muslims' group demands.

## Qualitative Analysis of Muslims' Group Demands for Rights

Following from the earlier discussion, we distinguish between two types of group demand for rights: 'exceptional' and 'parity'. By 'exceptional', we refer to those group demands for rights that are not already granted to other native cultural, minority or religious groups. Claims for exceptional group rights demand something substantively 'new', or a special exemption for the migrant or religious group, which if realised, sets the group apart from all other groups. It is particularly challenging to the form of cultural pluralism sponsored by a country's policies, because it demands group rights, and exemptions from duties, that go beyond those granted to other national minority and religious groups. For example, those claims relating to conflicts over Muslim women wearing the headscarf in French state institutions where religious symbolism is prohibited are examples of exceptional group rights demands. In contrast, 'parity' demands for group rights request the same privileges, and exemptions from duties, that are already extended to other religious and minority groups. Here the group demand is for equality with other groups who are already granted special treatment. Such demands for parity are generally less challenging and easier to accommodate than 'exceptional' ones, because they do not directly challenge the logic of the category system used by a country's migrant or church/state policies. On the contrary, they only demand that the privileges already granted to some minorities, are extended to another migrant group. For example, if Turkish Muslims in Germany request state subsidies for religious and cultural organisations of the kind already granted to Jews, then this is a parity demand.

Not all group demands are for rights, there are group demands which are weaker and which simply mobilise the group's collective identity in the public domain rather than engaging in the context of rights on offer from a country's multicultural policies. An example of this would be the Islamic federation in Berlin denying that it had links with the extremist group Milli Görüs, stating 'we want to transmit the Islamic religion, not politics'. This is not a demand for group rights made on the host state and society, but an assertion of group identity that is made in it. Our analysis will focus principally on cases of exceptional and parity group rights demands, which are more explicitly formulated.

In addition, we consider the nature of the relationship between the state and native public, on one side, and the Muslim group, on the other, which produces a group demand. We refer to this as the *motivational impetus* of a group demand. A 'proactive' group demand is mobilised autonomously by the Muslim group, independently from actions by the state and host society actors, and is a more assertive form of claims-making. Conversely, a 'reactive' group demand is when it is mobilised in response to an intervention by state or native public actors, for example, when the state officially bans a form of religious expression in public places.

Lastly, we look at the type of action form used to mobilise a group demand. Here we use the standard social movements' categorisations for protest action repertoires which range from conventional and demonstrative, to confrontational, and then violent forms.

The strategic orientation of group demands may be either *acculturative* or *dissociative* in their relationship to a state's cultural pluralism. *Acculturative* claims-making fits within the state's framework and policies for categorising minority or religious groups, whereas *dissociative*

claims-making challenges the state's approach to minority and religious difference, by making demands which go further than, or ignore, current formulations. In general, one would expect exceptional rights demands to be *dissociative* because they are the most demanding on the dominant host culture. They are subsequently also likely to lead to reactions by state institutions and native public discourses, which may result in conflicts. Parity rights demands also have a potential to become highly controversial, and provoke strong host society and state reactions. However, 'parity' group demands are more likely to be *acculturative* than exceptional demands, because they try to fit into an existing framework of political accommodation.

### **The Netherlands: Islam Pushing for a New 'Pillar'**

The examples of Muslim group demands in our Dutch sample cover issues that are common to the literature on multiculturalism. Six cases refer to issues about Islamic schools, six are about attempts to set up a Dutch Imam school, and the remainder cover requirements and exemptions for halal meat, provision of religious and cultural centres, Imams for Muslim prisoners, broadcasting rights for Muslims, and divorce by *sharia* law.

Of the group demands by Muslims in the Netherlands, sixteen of the twenty one cases in our sample are demands for 'parity' group rights with other groups, four of the cases are claims for 'exceptional' group rights, and only one case stands outside the context of rights demands.

Concerning the action forms used to mobilise demands, there is only a single case of protest. In this instance, the Aya Sofia Association and the Mosque Neighbourhood Association Milli Görüs in Amsterdam West organised a 6000 strong demonstration against the refusal of the borough government to permit a large cultural centre. In all other cases, Muslims used conventional action forms for claims-making, including public speeches and statements. This predominant use of conventional action forms gives a first indication of the receptiveness of Dutch multicultural politics to group demands.

At first glance, our findings fit the cosy image that Dutch group-based multicultural policies produce a pacified and acculturative form of group demands by Muslims. As we have seen, the Dutch state grants minority group rights almost automatically in a way that encourages migrants to see themselves as new groups with new group demands. Indeed the Dutch political space is so receptive to group claims, that even for Muslims, a group which other countries find difficult to accommodate, it is hard to make 'exceptional' group rights demands. This is because the Dutch state appears ever willing to acknowledge another cultural religious 'pillar' within its national political community, using the principle that what is already granted to some groups must therefore be extended to all groups.

Another finding that points to the confidence of Muslims in the Netherlands for making group demands, is that seventeen of the twenty-one cases of Muslim's group demands were proactive, compared to only three that were reactive, and one that was neither. Again this seems to point to the beneficial outcomes of the Dutch style group-based multiculturalism which creates incentives for Muslims to make this type of demand. Before getting too carried away

with the benefits of Dutch multiculturalism, however, it is first worth looking more closely at specific examples of these claims and the nature of the controversies which they represent.

Turning to the 'exceptional' group rights demands, a first example is where a separate Islamic Butchers' Association is set up with the claim that Muslims are unable to follow the regular training and education of butchers because their faith prohibits them dealing with pork. Another exceptional group demand occurs when the Union of Moroccan Muslim Organisations in the Netherlands (*Ummon*) advocates educating Imams in the Netherlands, and providing education in the language and knowledge of Dutch society for foreign Imams. These are good examples of Muslims in the Netherlands having the confidence to proactively demand new exceptions as a group in the belief that this will be straightforwardly accommodated by the state. Although they are examples of exceptional group rights demands, the strong group-based enforcement within Dutch multicultural policies means that overall these claims are acculturative rather than dissociative in nature, and unlikely to provoke reactions from the host society.

In contrast, it is the strength of the enforcement of the group rights principle by Dutch politics that actually causes another of our examples of exceptional group rights demands. In this case, Muslims actually challenge the consequences for them of the over-liberal tendencies within Dutch multiculturalism. The Dutch Muslim Council and the Moroccan Women's Society come out publicly against the bill proposed by the Secretary of Justice to allow for one-sided marriage dissolution according to Islamic law. Here the dissociative basis of the Muslim demand is against the proposed policies of the Dutch state, which appears willingly to promote exceptional group rights for Muslims that at least some important groups do not even want. It also indicates that the state promotion of groupness *ad infinitum* is prepared in some instances to subordinate Dutch law about gender rights to what is seen as the internal law of the Muslim community. In this example, the rosy image of the consequences of cultural pluralism Dutch-style begins to slip. This case of extreme multiculturalism seems content to view Muslims as a society apart from the Dutch, and fit to be run by their own internal community rules, a position which the Muslim groups themselves challenge. Such a policy stance would be unthinkable in Britain. Indeed the biggest threat or challenge to the integrative capacity of the nation-state in this instance is from the over-willingness of Dutch policy-makers to grant exceptional group rights rather than from the Muslims' group demands.

Looking now at some Dutch examples of Muslim demands for parity rights, it is clear that many of these would constitute demands for exceptional group rights in Britain. Thus the Islamic Broadcasting Foundation claims that its right to broadcast on the public channel is a good way of advancing the integration of Muslims into Dutch society. The Halal Food Foundation announces that it hopes to end the 'unreliable' supply of ritually slaughtered meat for the Islamic consumer after being granted the right to introduce their own hallmark, a concession giving them a parity of rights with Jews. The Islamic Council of the Netherlands and researchers associated with the Islamic Chair of the University of Amsterdam, make a demand that there should be between 25 and 30 Imams employed in prisons. According to their research, this would bring Islam proportionally in line with other faith denominations. These examples demonstrate, firstly, the far-reaching sponsorship of group rights by the

Dutch authorities, and secondly, that this creates a political space and set of incentives for group demands by Muslims. This legitimization of group demands by Dutch multicultural policies, has the effect of making those Muslim group demands seem officially benign, which in Britain would most likely provoke reactions from states and native publics.

In the cases relating to training Imams, we find the following group demands: The Centre for Islamic Studies advocates state sponsorship for the education of Imams, on a par with that provided for Christian vicars and priests, on the condition that the government does not interfere in the substance of the education. In a case already referred to, the Union of Moroccan Muslim Organisations in the Netherlands (*Ummon*) makes a request for additional Dutch language training and knowledge of Dutch society as part of the education for Imams. The holder of an Islamic Professorial Chair at a University comes out in favour of a Dutch Imam education, as does a resident Imam. Against this the President of the Turkish–Islamic Cultural Federation strongly criticises the proposals of the Dutch liberal MP Dijkstal to found a Dutch Imam school. Here we find a range of different positions being expressed by leading organisations from different factions within the Muslim community, all in response to an agenda of group rights set by the state. These examples of claims-making about Imam education are illustrative of another feature of the controversies about Islam in Dutch society. Instead of controversies occurring between the native population and Muslims, Dutch state policies tend to promote controversies and competition over resources within different factions of the Muslim communities.

Such factionalism and competition within Muslim communities, may lead to the proliferation of ever smaller denominations of groups, who demand their own group rights from the state. Further evidence for this comes from our claims on Islamic schools. In one case, the Foundation of Islamic Primary Education (IQRA) demands that different denominations from within Islam have the right to separate schools.<sup>10</sup> In another, the Headmaster of the Yunus Emre Islamic primary school in The Hague advocates that a new school should be founded for a more orthodox Islamic education. On the same matter, the Islamic School Board Association (ISBO), an umbrella organisation for 29 Islamic schools in the Netherlands, publicly rules that the distinction between whether a school follows liberal or orthodox Islamic teaching is unimportant. Once more, this issue demonstrates that Dutch multiculturalism encourages Muslims to set up ever smaller denominational groups, through establishing new organisations which they expect will receive state recognition and subsidies. Also the orthodox Islam that these smaller factions will teach are likely to reproduce the separatist tendencies that will lead to internally cohesive Muslim communities, but ones which are inward-looking, and which hardly fit into Dutch society. Here we witness once more that Dutch liberal multiculturalism lets community group rights take precedence over the national community. Such an approach takes Dutch society in a direction that may reproduce parallel and divided rather than cohesive societies.

### **Britain: Islam as a Challenge to Race Relations**

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<sup>10</sup> In the Dutch case, this is not an exceptional group rights demand because it is a right that is already extended, for example, to the Reformed and Calvinist denominations of Dutch Protestants.

In our group claims by Muslims in Britain, five cases relate to the issuing of a fatwa against Salman Rushdie for publishing the Satanic Verses.<sup>11</sup> Another five relate to the perceived stigmatisation and lack of respect by the native population and within the public sphere for Islamic symbols and people. Of the remainder, a significant proportion are about the relationship between the state and the Muslim community, including claims about state subsidies and recognition for Islamic schools, religious education in state schools, anti-discrimination measures for Muslims, treatment of Muslims in state prisons, the suitability of social amenities provided by authorities for Muslims, and finally, the political representation of Muslims.

Of the twenty seven group demands, nine are for exceptional group rights, nine are for parity group rights, and nine do not make rights demands. This differs from the Dutch case where most demands are for parity rather than exceptional rights. In general, this indicates that Muslims in Britain have more difficulty fitting their demands within the framework of state-sponsored multiculturalism than their Dutch counterparts.

Regarding the motivational impetus of Muslim group demands, we find a strong tendency for proactive claims in Britain, with twenty proactive cases, five reactive, and two unclassifiable, which is similar to the Dutch. This shows that British Muslims like their Dutch counterparts have sufficient incentives from their country's multicultural policies to assert themselves autonomously, instead of simply reacting to issues raised by the state and host society. However, in contrast to Dutch Muslims' assertiveness which was almost entirely acculturative and for parity demands, a significant proportion of assertiveness by British Muslims is dissociative and for exceptional demands (all nine cases of exceptional demands are proactive). Dutch multicultural policies appear to stimulate a type of Muslim pro-activism for group demands that is easily absorbed by state authorities in a non-contested way. In contrast, the more restrictive British definition of multicultural group rights seems to produce a different type of pro-active Muslim group demand, which is more confrontational than those in the Netherlands.

This confrontational nature of Muslim group demands in Britain is underlined by their action forms. In seven out of twenty seven cases, Muslims use protest to mobilise their group demands, and five of these are confrontational or violent events. In one protest, Muslim youths petrol bomb a Bingo hall in Luton. They are protesting against a company called 'Mecca' using its brand name on public display to promote gambling. In another, Muslim tenants launch a petition against Blackburn Council requesting that their toilets be repositioned so that they no longer face Mecca. In a further two cases, Muslim parents organise boycotts by their children of state schools against what they see as the harmful effects of comparative religion lessons in the national curriculum. In the last of the confrontational/violent protests, two hundred people attend a Nation of Islam (UK) rally, a black rights group.<sup>12</sup>

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<sup>11</sup> This is the case even though our sample only starts in 1992, a few years after the fatwa was issued against Rushdie (1989), which underlines the resonance of this case for Britain.

<sup>12</sup> This case is the only group demand in our British sample that is not by Muslims of Indian subcontinent origin. Although scholars of religion often do not include Louis Farrakhan's Nation of Islam movement as a form of Islamic belief (e.g. Robinson 1997), our selection criteria is on how groups label themselves and are visible in

Turning to the nine exceptional group demands, all of which are proactive, three refer to the Rushdie affair and challenge the sovereign authority of the British state. In one case, the Muslim Parliament<sup>13</sup> appeals to the authority of Islamic law above British law: 'He (Rushdie) has committed a capital offence. An Islamic legal authority has passed a judgement. It's just like a court passing a judgement in this country. The Muslim community feels that this judgement is right and legal'. In others, again by the Muslim Parliament, but also by the Bradford Council of Mosques, anti-Rushdie sentiments are tempered by emphasising that campaigns against the Satanic Verses should remain within British law. In another, a Muslim prisoner challenges the state's 'strip search' method, arguing that he was entitled to maintain his religious beliefs and that a decision not to provide him with modest clothing was 'unlawful and unreasonable'. The boycott against comparative religion classes in the national curriculum, already mentioned, was supported by the Association of Muslim Schools who argued: 'If they get bombarded with different ideologies and different thinking, the Muslim child gets so clicked on to what the teacher is saying, that he or she thinks whatever the teacher is saying is the truth.' The welfare provision of state authorities is the target of criticism in the other demands. For example, the Muslim Parliament argues that the Commission for Racial Equality is inadequate for addressing discrimination against Muslims and advocates the setting up of a Muslim welfare state. In one case, however, a non-state actor is the target. Muslims in Nottingham criticise a shop-owner for displaying shoes in his window that have verses from the Koran printed on them: 'It is more serious than Salman Rushdie. Rushdie wrote a book which you carry in your hand. Here the holy name goes on the feet!'

These examples show that exceptional group demands by Muslims do not fit easily in British Race Relations politics, and are not easily accommodated by it. The demands we cite, in particular those on Rushdie, are highly incommensurable with the values of minority politics sponsored by the British state. This finding is evidence that there are aspects of Islamic religious belief, that require rituals, practices and the expression of beliefs in the public domain, which British policies have difficulty in accommodating and which lead to conflicts. According to our interpretation, this British Muslim assertiveness is not simply an inherent characteristic of the Islamic belief system, but is an outcome that is importantly shaped by the type of political opportunities with which minorities are confronted by British-style cultural pluralism. As we discussed earlier, British Muslims achieve group rights as racial, ethnic or national minority groups, but not as a religious minority group. Hence Muslims are included as a special group in the political community only indirectly, as ethnic or racial minority groups, and not directly as Muslims, which is how they see themselves. Living in a country with which they identify as much as other ethnic minorities<sup>14</sup>, Pakistani and Bangladeshi

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the public domain, which necessitates inclusion. The Nation of Islam movement has been imported from the United States to Britain and finds support among some sections of the African Caribbean community.

<sup>13</sup> The name of this organisation the 'Muslim Parliament' is somewhat misleading because it is neither a broad-based nor representative organisation for Muslims in Britain. It is entirely nominated and self-selected, and exists as a forum for expression of more radical forms of Islam and for ideas that suggest secession, or at least isolation, from British society (Rex 2002).

<sup>14</sup> Asked whether they thought of themselves as British, 66% of Pakistani and 60% of Bangladeshi minorities (predominantly Muslim) answered in the affirmative, compared to 62% of Indian (predominantly Hindu) and 64% of Caribbean minorities (Modood et al 1997: 329).

Muslims feel aggrieved, that their preferred form of self-identification is not legally sanctioned. Muslims perceive that this leaves them as 'second class' minorities. They see themselves as less protected from discrimination by the state than other minority groups, and as believers of a faith that the state has been unwilling to uphold on a par with other minority religions. The comparison with the Netherlands is instructive. Whereas Dutch multiculturalism creates pressure for too many types of groups to be included in society causing competition between minorities, British Race Relations leaves Muslims feeling excluded as group, and they assertively make demands on a state which they perceive as relegating them to a 'second class' status in the national community.

This interpretation receives further support from our examples of parity group demands, which are more acculturative, and construct a vision of how Muslims would like to position themselves within the Race Relations framework. A first case appears in the context of the Runnymede Trust's consultation document on 'Islamophobia', which calls for radical changes in the attitudes of politicians, media and community leaders to fight discrimination against 'British Muslims' (sic). Here the Muslim College criticises the state for not extending the same anti-discrimination measures to Muslims as it does for others, arguing that, 'the vast majority of our community want to live in this country and want to be citizens of this country. It is our right as citizens to be able to say to the country, 'Here, we think your policies are wrong'. In another after the 1995 Bradford 'race riots', Muslim Community leaders and the Muslim Parliament claim that 'Pakistanis are twice as likely to be unemployed than Afro-Caribbean or Indian people, there is no other reason for this than discrimination or demonisation of Muslims.' In similar vein, two editors of Muslim newspapers criticise the suitability of the Commission for Racial Equality for 'Muslim racial problems', with one stating, 'the Muslim population is doubly discriminated against firstly because of their skin colour, and secondly because of their religion.' Such claims are not confrontational expressions of cultural difference *per se*, but constitute reasoned arguments for more space to be granted within British multiculturalism so that Muslims can act as full and equal citizens in the national community. The examples are not atypical, in others, the UK Action Committee on Islamic Affairs calls on political parties to court the Muslim vote or face a profound cost to social harmony, and a local Islam society liaises with the Borough Council to better understand why there is less usage of leisure facilities by the Muslim community than other sections of the population.

Although these parity demands often use the 'civic' language and terminology of Race Relations and express the aim of improving the integration of Muslims in British society, this does not mean that accommodating such group demands would be unproblematic. The Muslims' perceived grievances are not just about higher levels of discrimination than other minority groups in society, but about how to fit their religious faith community into the landscape of British civic values. This is what is meant by 'double discrimination' as a minority and as a religious group. In Britain, where the state relegates religious practice to a matter of private individual conscience, it is difficult to accommodate organisations which integrate the functions of civic association and religious faith provision in the public domain. As we discussed earlier, the public nature of religious practice and its overreaching into associational and political activities makes Islam a special case among British minority religions.

In the last two cases of parity demands, the state's drive to provide a universal national education comes into conflict with Muslims for whom religion and faith is a way of life, and not simply a ritual act. In one case, a Muslim father believes that Trafford Council discriminated against his daughter by paying fees for Catholic pupils to attend an independent Catholic school, but not for his daughter to attend an independent Islamic school. An important difference between Catholics, and for that matter Jews, –other minority religions– compared to Muslims, is that in practice their religious denominational schools are for the most part religious in name but serve a largely secular population. The British state has been fairly consistently resistant to granting funding for Islamic schools.<sup>15</sup> The reason for this is the fear that through Islam ways of life that are founded on non-British values will be promoted by Islamic schools. Such a stance contrasts sharply to that of Dutch policy-makers prior to their recent policy shift, and it defines the cleavage of Race Relations *vis à vis* Muslims. On one side, Muslims assert their civic credentials as 'British Muslims', aggrieved at what they perceive as the discrimination against them by the state and native society. And on the other, the state pretends that Muslims are part of the British community, but steadfastly refuses to grant them the group rights that they fear would foster a segregated community of religious zealots living outside of British law.

## Conclusion

This article set out to address the challenge to social cohesion presented by migrants' group demands, by looking at empirical evidence in Britain and the Netherlands, two countries which in different ways and to different degrees had proceeded down the path of attempting to accommodate cultural difference within their national political self-understandings.

First, we demonstrated that when viewed quantitatively, the level of controversy about group demands is rather modest within the politics of claims-making about immigration and ethnic relations, accounting for only 7.7% of claims in Britain and 5.5% in the Netherlands. This seems to indicate that the strong emphasis on group demands within the migration literature over the last decade has not been matched by reality. Far from the images of societies pulling themselves apart at the cultural seams (see e.g., Huntington 1996), the cultural difference of migrants in their European societies of settlement does not appear to be the main characteristic of their own claims-making nor does it appear to be on a scale that would threaten the social cohesion of societies. However, this should not be interpreted as meaning that migrants' group demands are easily accommodated and unproblematic.

Second, we found that controversies about group demands were to a large extent about the position of Muslims in western societies. This resilience of Islam to political adaptation was demonstrated by comparison with another migrant religion Hinduism. Muslim and Hindu migrants share similar characteristics: they settled in the same waves of post-war migration, they come from the same regions of origin, with the same postcolonial traditions, and have

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<sup>15</sup> In England and Wales, about 7,000 of the 25,000 schools are faith schools which receive state support. In 2002, there were 4,716 Church of England, 2,110 Roman Catholic, 27 Methodist, 32 Jewish, 4 Muslim, 2 Sikh, 1 Seventh Day Adventist, and 1 Greek Orthodox faith schools. Despite longstanding requests, it is only in the last couple of years that this funding status has been granted to Muslims.

the same type of community structure based on familial ties and patron-client relationships. However, in contrast to Muslims, our data shows that Hindus are largely conspicuous by their absence in public. We argued that this Muslim exceptionalism was due to the more visible and public nature of the religion, and the demands which it placed on followers' and their interactions with the core public institutions of the society of settlement.

Our qualitative analysis of group demands by Muslims showed that the more open Dutch and more restrictive British attempts to accommodate cultural difference had both encountered problems that are difficult to resolve. Close inspection revealed that the outcomes of Dutch multiculturalism do not support the notion that granting multicultural rights strengthens political integration in multiethnic societies. For a start, we find the Dutch state pushing group rights down the throats of Muslims, which at least some important sections of the Muslims community do not want. The Secretary of Justice's Bill to allow one-sided marriage dissolution, puts group law above national civic law by denying the individual equality of women. Here the famous Dutch tolerance seems prepared to sanction similar attitudes among the Islamic faith community –i.e., inequality of women- to the illiberal ones that it has long tolerated for decades from Protestant fundamentalists. This is only one case, but it is instructive about the impact of Dutch policies on associational activity by Muslims. The state grants so many group rights that being acculturative in the Dutch political context, does not substantively mean being integrated into the national community, but in some cases being separated from it. Dutch multiculturalism's toleration of Islam may lead to less public conflicts, but this can also be read as a lack of care for ensuring community cohesion. If the native Dutch communities are self-organised in their own 'pillars' and their lives do not come into any institutional contact with Muslims, then why should they be bothered by Muslims' strange demands and odd-sounding customs? Precisely these problems and the fear that policies were structuring the disadvantage of minorities lead to the shift in Dutch policy-thinking toward a more British-style integrationist approach.

British Muslims are similarly assertive to their Dutch counterparts. However, in contrast their group demands are more often for exceptional rights and dissociative. We find British Muslims mobilising assertively, sometimes violently, and often in ways that directly target the workings and principles of state authorities. On one side, the state remains unwilling to grant rights to Muslims fearing that the associational activities of the Muslim community cannot easily be included within its secular integrationist formula, not least because they aim to promote a political role for the Islamic faith. On the other, we find incommensurable demands by Muslims that appear to make such fears well founded. To be fair, we do also find a significant number of British Muslims' group demands that are made *within* the Race Relations framework and that would be relatively easily accommodated if Muslims were categorised as an 'ethno-religion' in British law. Nonetheless, we consider that it is unlikely the British multiracial politics will be able to accommodate Islam, without ongoing conflicts.

In short we have tested two national approaches for the accommodation of Islam, and found them to be problematic, but in different ways. This gloomy conclusion in part arises from the fact that Islam cannot simply be confined to religious faith but advances into the realm of politics where the state's authority and civic citizenship obligations reign supreme.

Perhaps the lesson to learn from the British and Dutch experience is that there is no easy blueprint for multicultural policies, especially with regard to Muslim migrants. Although accommodating Islam will be marked by conflicts, it is still perhaps better to have political conflicts over being part of a national community, than to have resident minorities who see themselves apart from the native civil society. In addition, the passage of time may bring more 'domesticated' nationalised forms of Islam, whose demands are more easily included within existing frameworks, and whose believers share more of the secular core values of the native majority publics. Much depends on the willingness of the Muslim communities to adapt and the states in their societies of settlement to negotiate viable, practical, and pragmatic forms of accommodation.

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