

**Social Justice, Religious Freedom and the Muslim Question in Europe: A Comparative
Study of France and the United Kingdom**

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I. INTRODUCTION

Both before and since the September 11th attacks the so-called “Muslim question” – the bundle of political, social and economic policies that relate to the Muslim community – has concerned governments across the world. In Europe in particular, Muslims continue to preoccupy policymakers who struggle to find coherent, effective policies that help balance the needs of all their people. A train of high-profile incidents have also demonstrated that the question is far from resolved and that states need to find better methods of integrating their local or “native” populations with that of Muslim immigrants and their families. Current integration policies vary greatly across the continent and the effects of those policies appear equally varied. France and Great Britain represent the policy extremes within Europe, however their goals are nonetheless the same: integrate, or in the French case assimilate, these Muslim communities into the greater population.

This desire to integrate and accommodate Muslim immigrants stems from both a practice need to maintain stability, and a theoretical desire to promote a form of governance that achieves social justice. Freedom and equality of religion is part of the bedrock of social justice theory and is a necessary component of any true democracy. Nevertheless, a growing tide of religious intolerance throughout Europe over the past decade questions the commitment of these governments and their people to social justice as it relates to religious freedom. This paper seeks to examine two divergent attempts to create a solution that balance the needs of both sides. In understanding the success or failure of each position, policymakers are better equipped to balance the ideal of social justice with legitimate safety concerns.

Observers have noted anecdotally that states that create policies that are meant to foster greater accommodation of, and respect for, Muslim communities within their borders also seem to have greater difficulty integrating these same populations. This somewhat perplexing contradiction is not only an interesting academic exercise in and of itself, but understanding that relationship has far-reaching policy implications for governments looking to find equitable solutions to growing immigration concerns.

II. PREMISE

This paper aims to look at how policies of accommodation of Islam in Europe may or may not be correlated with degrees of integration and, as a result of that analysis, assess ways that governments might construct policies on religious freedom to achieve the ideals of social justice. The analysis relies on two countries as case studies: the UK and France. They have two of the largest Muslim populations in Europe and also have two very distinct approaches to the Muslim question. As the same time, each has laws and constitutional provisions that express support for religious freedom. Most fundamentally, the Universal Declaration of Human Rights clearly identifies religious freedom as a basic right: “Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.”¹ Their experiences, as detailed in subsequent sections, are different as well. France is largely intolerant of a distinctly Muslim identity, but has proven most successful at integrating these populations. By contrast, the UK has assumed a much more tolerant, open and multicultural position. And yet, British Muslims are

¹ Universal Declaration of Human Rights, Article 18. Accessed from: <http://www.un.org/en/documents/udhr/index.shtml>

considered the least integrated in Europe. Indeed, studies repeatedly report that British Muslims self-describe themselves as “Muslim” over “British” by large majorities.

III. MEASURING ACCOMMODATION AND INTEGRATION

Perhaps the most important question in this exercise is the measurement of accommodation and integration. Rather than take these assumptions as given, I plan to investigate if these guiding notions are, in fact, true and by doing so find causal links between national policy and extent of integration. Both accommodation and integration are inherently unquantifiable but can be measured qualitatively along several measures. For the purposes of this analysis several qualities are linked to each. Accommodation takes into account immigration policies, political rhetoric and government policies that lend themselves to greater understanding of and openness to Muslims. Integration is harder to fully measure. I rely here on two principle types of indicators. The first includes more objective metrics like the amount of terrorist activity and civil unrest, education rates and parity in socio-economic variables. The other is more qualitative, and relies on immigrants’ self-reported feelings of belonging as well as how the “native” population views the Muslim minority in their country.

IV. HYPOTHESES

There are, of course, numerous reasons why one may find this counterintuitive result. It is hoped that through a detailed survey of the landscape in which these divergent policies operate the effect of those policies will become clearer. The most promising explanation for this seemingly counterintuitive result is that national policies, particularly in the case of the UK, run only skin deep. Indeed, behind a patina of multiculturalism lies a deep divide, socio-economic and

otherwise that has driven many younger Muslims into more isolated and sometimes radicalized behavior. Multiculturalism also may not achieve its intended effect. It is meant to foster an open dialogue and respect for divergent views and backgrounds, but that policy also promotes many viewpoints and cultures within the country in lieu of one, cohesive ideology. The reverse may be true in France – what seems to be at once an almost hostile stance towards Islam and the free expression of it may have more to do with the fierce protection of “French” values than a rebuke of any one population.

The greater feelings of belonging in France may stem at least partially from high barriers to entry -- referred to here as the “fraternity effect.” Perhaps governments that make inclusion difficult (requiring greater commitment from immigrant communities) actually might find that those populations feel more attached and responsible to the greater society. Finally, other contributing factors like country of immigrant origin and the nation’s colonial relationship might also explain differences in integration but may not offer much help to policymakers. By resolving these questions, one can begin to explore closely related issues and develop policy alternatives that allow immigrant populations to equally participate in, and contribute to, society.

V. BACKGROUND

Due to the flexible immigration laws of Europe’s past and present, the presence and influence of Muslims within the European countries has never been higher. According to the National Intelligence Council projections, given Muslim birth rates and continued immigration, the

Muslim population in Europe will double by 2025². Estimates suggest that there are currently about 16 million Muslims (from immigrant backgrounds) living in Europe. Indeed, the 2001 census suggests that about half of the population increase from 1991 to 2001 in the UK was due to immigration alone. And while some Muslim immigrants arrived after World War II through guest worker programs, others continue to immigrate to further their education and explore job opportunities through both legal channels (visa) or through illegal methods. While generations of immigrants have lived in Europe and established strong roots, a distinct ethnic identity or “ethnic minority” group associated with Muslims remains regardless of whether they were foreign or domestically born. That same Muslim population in Europe is also growing at an extremely rapid rate — tellingly, the Office for National Statistics (ONS) in Britain reported in 2009 that Mohammed overtook likes of Daniel and Thomas as the most popular name for newborn babies in London and other counties.³ There can be no dispute the “Muslim question” remains a question, and finding the answer will only become more important in the future.

V. ACCOMMODATION: FRANCE

In 2003, Interior Minister Nicolas Sarkozy created the “French Council of the Muslim Faith.” He created the council in the hopes that it would give Islam a voice. That action, viewed from an American, multi-vocal, melting pot stance seems reasonable enough. However in France the measure was highly criticized by many who believed that France was, and must remain, a strictly secular state. Therein lies the inherent tension in France between the Muslim and non-Muslim populations. The unrest in the suburbs and widespread controversy over proposed laws on the

² “Rising Powers: The Changing Geopolitical Landscape,” Mapping the Global Future: Report of the National Intelligence Council's 2020 Project, December 2004.

³ Lefort, Rebecca and Leapman, Ben, “Mohammed is most popular name for baby boys in London.” Accessed from: www.telegraph.co.uk. September 15, 2009.

wearing of headscarves and veils have highlighted the ideological fault lines within French society. Moreover, these events have also led many to believe that Muslim customs, and indeed Muslims themselves, may not be welcome in France. In reality, the French are not simply hostile towards Muslims, but towards religion in general. It may be, however, that other religious groups can accept this fact, and indeed assimilate, more easily than Muslims. The decidedly French breed of secularism – encapsulated by *laïcité* – leaves little room the “ostentatious” expression of religion of any kind. The concurrent notion of equality is also held strongly by both politicians and the public alike and rejects different treatment for any single group. This ideal of secularism and strict equality surface make France, at least superficially, appear unaccommodating of Muslims.

Indeed, assimilation and secularism have been at the heart of French values for centuries. Beginning with the French Revolution, respect for all religions necessitated a theoretical wall between government and religion. In place of affirmative action, programs like free universal education and stringent anti-discrimination laws laid the foundation for a meritocracy where everyone had, in theory, *equal* opportunity. The world wars also necessitated cohesion among the various regions of the country –respect for the supremacy of the national language and culture were some of ties that helped bind French society in a time of great need. It is through that lens that we view French policy decisions.

Rules regarding immigration and citizenship represent the first true test of accommodation and openness. French law in this area has changed many times in the past few decades. The far-right, led by Jean-Marie Le Pen has used anti-immigration as an election rallying cry. In particular, his

platform has even called for the expulsion of Muslim immigrants from France. The work of the Right in France resulted in the *Pasqua Law*, passed in 1993 that, according to the Brookings Institute, “sought to stem the remaining legal flows in a variety of ways: by prohibiting foreign graduates from accepting job offers by French employers and denying them a stable residence status, by increasing the waiting period for family reunification from one to two years, and by denying residency permits to foreign spouses who had been illegally in the country prior to marrying.”⁴ The effect of such measures was to make formerly legal migration flows illegal. Today there are still many people living in France with an uncertain fate. Known as *inexpulsables-irrégularisables*, they cannot be expelled, and are not eligible for residency permits.

Following the riots of 2005, the right passed another law in 2006 that made it more difficult for unskilled migrants to settle in France, abolished the rights of illegal immigrants who remain after ten years and also made family unification increasingly difficult. The new measure successfully reinforced the assimilationist paradigm. The law required immigrants from outside the European Union to sign a contract agreeing to learn French and to respect the principles of the French Republic. At the time, the BBC reported President Sarkozy’s view that the legislation was meant to improve integration but also enable better self-selection of immigrants. “France, like a number of other Western countries, needs to choose the immigrants it needs.”⁵ Today, French law still allows first generation Islamic families of those living in France to immigrate. However, second-generation Muslims born in France must claim their citizenship when they become adults. In light of these tougher immigration laws and Sarkozy’s statement the question then becomes: are

⁴ Guiraudon, Virginie, “Immigration Policy in France,” The Brookings Institute. January 1, 2002.

⁵ “French immigration bill approved,” BBC News. June 17, 2006.

officials choosing or rejecting Muslim immigrants through such policies?

There is some evidence, at least anecdotally, that French assimilationist ideology places limits on who can immigrate based on certain religious qualities. A French court in 2008 denied citizenship to a Moroccan woman on the grounds that by wearing a veil “her ‘radical’ practice of Islam was incompatible with French values.” What’s more, an Agence France Press article wrote about the key role of French values and it’s incompatibility with some Muslims customs: “The justice minister said the wearing of the niqab or burqa was a ‘problem that affects our ability to live together, the values of the republic and in particular human dignity.’”⁶

Based solely on citizenship and immigration policy, there is little doubt that France is not overtly welcoming of Muslim immigrants – indeed few European governments are. But the issue of immigration goes beyond national laws. The attitudes of the French people toward immigration are also an important indicator of the climate in which Muslim immigrants enter and live in the country. In one study, the respondents of six countries were asked what they thought about the number of legal immigrants residing in their country. 32% of French people believed that there were too many – the lowest in the study. 55% of German respondents and 67% of British respondents – significantly higher than France – felt similarly.⁷ Another study posed the question: “Immigrants take our jobs.” 54% said yes in the US, while France was the lowest in Europe with 34%.⁸ When asked if immigration increased crime, again France was the extreme

⁶ “No French citizenship for 'burqa' Muslims.” Accessed from: http://www.expatica.com/fr/news/french-news/No-French-citizenship-for-burqa-Muslims_58711.html. October 12, 2009.

⁷ Source : I.H.T./France24, IHT. May 25, 2007

⁸ Source: Transatlantic Trends, German Marshall Fund 2008 in *Le Monde* Nov.18, 2008

in Europe – 70% said it did not.⁹ And perhaps most interestingly, French people reported that they considered immigration overall to be an opportunity and not a problem.¹⁰ In this instance there is a cognitive dissonance. Official policy is non-accommodating, but the people themselves view it in a generally positive light.

The tone of public discourse with regard to these populations is another measurement of the degree of tolerance in each country. Xenophobic language contributes to the marginalization of these minorities and can sow the seeds of discontent. According to a 2010 report by the group Human Right First, “There is a longstanding strain of political discourse in Europe that has projected Muslim immigrants as a threat to European security, homogeneity, and culture. The situation has worsened in recent years in the context of official government responses to terrorist attacks.”¹¹ Politicians in France are relatively unabashed compared to some of their European counterparts in speaking about how they view the immigrants in their country. In particular, most French political elites repeat a common refrain – Muslims are welcome so long as they conform to strict behavioral and cultural norms. Following the controversial Swiss vote on November 28, 2009 to outlaw the construction of minarets,¹² the response of many leaders in France was one of support: “Responding to the government's ruling, the right-wing mayor of Nice, Christian Estrosi has said there will be no minarets built in his Riviera city. ‘Minarets are not part the architecture

⁹ Source: Transatlantic Trends, German Marschall Fund 2008 in *Le Monde* Nov.18, 2008

¹⁰ Source: Transatlantic Trends, German Marschall Fund 2008 in *Le Monde* Nov.18, 2008

¹¹ “Violence Against Muslims,” Human Right First. 2010.

¹² “Swiss vote to ban minaret construction,” CNN. November 29, 2009.

of our country,' said Estrosi, who is also the minister for industry."¹³ In this case, at least, French politicians have extended this assimilationist attitude to include Muslim architecture.

The Danish cartoon scandal, called "Affaire des caricatures de Mahomet" in France, provided another opportunity to measure the accommodation and acceptance of the sensitivities of the Muslims living in France. Several papers including *France Soir*, *Liberation*, *Le Figaro*, *Le Parisien* and even *Le Monde* re-published the controversial cartoons. While President Jacques Chirac condemned it as "overt provocation,"¹⁴ the papers stood by the decision as an affirmation of the sacrosanct French right to free speech regardless of its impact on certain communities. Even the Socialist Party, usually a leader in social reforms in France and an ideological counterpoint to the far-right, sided with the papers: "[L]aw should not be made in the streets'... 'press freedom is part and parcel of democracy, which is non-negotiable.'"¹⁵

Perhaps most saliently, major events of unrest have highlighted the true nature of acceptance of the Muslim population. The circumstances of these events, their causes and the public and government responses are all illuminating. In France, two events of the recent past – the 2004 headscarf ban and the 2005 riots -- ignited tension between the Muslim minority and the general population. The headscarf ban, proposed by President Jacques Chirac and his ruling centre-right

¹³ "Sarkozy warns against 'provocation' after Swiss vote." Agence France Press. Accessed from: http://www.expatica.com/fr/news/community_focus/Sarkozy-warns-against-provocation-after-Swiss-vote_58678.html. 09/12/09

¹⁴ "French papers in cartoon lawsuit," BBC News. February 2, 2006.

¹⁵ Scruton, Roger, "Muslims and Europe: a cartoon confrontation," OpenDemocracy.net. February 6, 2006.

UMP party, can initially be viewed in two lights. The first sees the ban as a rejection of Islam, of diversity and the immigrants themselves. Polls taken during that time show clear support among the general population for the law. Indeed, fully 70% of the public supported the ban and the Assembly passed the measure by an overwhelming vote of 494 to 36.¹⁶ Although similar bans are supported across the continent, France seems to support it more clearly than any other. Proponents of the ban argued that this was a question of strict secularism and a means of enforcing equality. While many claimed the law was anti-Muslim, the ban encompassed over ostentatious symbols including large crosses and yamachas. The implication was that this ban was, in effect, an equal-opportunity rejection of *all* overt displays of religion. Muslim activists decry these laws as violating the very principle of equality. Put another way, they claim that in order to be French and enjoy equality under the law these immigrants must shed the vestiges of their Muslim past. A report by Yazid Sabeg – one of the few highly successful businessmen in France of Arab origin – and the Institut Montaigne, takes issue with the inherent rules that govern recognition of a true Frenchmen. In writing about the headscarf ban Mr. Sabeg eloquently writes:

“L’acharnement français contre le foulard est symptomatique du problème maghrébin français : accepter un Maghrébin comme français à part entière, serait l’accepter... sans sa religion. Il semble que nous voulions inconsciemment répéter les erreurs du passé, et redire qu’islam et citoyenneté sont incompatibles.”¹⁷

The French fervor against the headscarf is symptomatic of the French North African problem: to accept a North African as completely French, would be to accept him ... without his religion. It seems that we want to unconsciously repeat the errors of the past, and say again that Islam and citizenship are incompatible. (Self Translated)

¹⁶ Wyatt, Caroline, “French headscarf ban opens rifts,” BBC News. February 11, 2004.

¹⁷ Sabeg, Yazid & Méhaignerie, Laurence. “Les oubliés de l’égalité des chances: Participation, pluralité, assimilation...ou repli?,” Institut Montaigne. September 2005.

The French government has enacted, or is considering, several laws that at least imply that France does not make room for a unique Muslim or indeed religious identity. Most recently, the government is considering legislation that would outlaw the burqa in public. President Sarkozy has not only backed the ban and but he has eschewed more moderate proposals that would have placed limits on the ban to only include state institutions such as schools and town halls. The ban would also apply to tourists visiting France.¹⁸

Part of the government's rationale for such policies are that they are balanced by strict anti-discrimination legislation. The 2006 Equal Opportunities Law reaffirmed pre-existing antidiscrimination laws and expanded the employment opportunities for low-income immigrant communities. In addition the 1972 antiracism law also prohibited both public and private acts of racism and discrimination. These laws, however, failed to inspire any new initiatives to redress that racism. Taken together, these laws make for a decidedly unaccommodating climate for Muslims in France and the laws that are in place to protect Muslims are not easily enforceable.

Despite such legislation, there are signs that the government is willing to make certain overtures. French policymakers have intimated that they have no desire to develop affirmative action or quota systems, but emphasis *has* been placed on establishing an open dialogue with the Muslim community. For example, the French Council for the Muslim Religion was created by the government to give the roughly 1,600 Muslim associations and mosques in France a singular religious voice; the Council does not purport to represent all Muslims generally. The council

¹⁸ "Proposed burqa ban will also be imposed on tourists," France 24. April 22, 2010.

serves as a forum to discuss issues important to Muslims -- such as the construction of mosques or provision of appropriate food for Muslims in jail – with the government. An initiative like the CFCM does not solve the issue of integration, but it does empower the community as a whole.

Compared to the British, the French have also taken a hard line towards imams working within the country. In the 1980s, fear that radical imams were fueling fundamentalism and occasional violence prompted the government to crack down on foreign imams, particularly those who did not speak French or who knew little about French society. That led to even more strict policies. New laws required that imams be born, or at least educated, in France and also allow for imams to be expelled from the country without trial or further explanation. The result was the creation of a body of moderate imams with closer ties to France that also prevents the influence of any imam who uses his position to promote radicalism. This was a successful effort to assimilate, more so than accommodate, foreigner influences.

VI. INTEGRATION: FRANCE

One proxy for Muslim integration is the opinion of the general public towards the Muslim community. Here I consider opinion polls of the French public and also the results of recent elections and how they may indicate certain sentiments within the French public. Indeed, public attitudes toward Muslims in France may reflect the degree to which they are integrated into the society as a whole. Although the evidence above leads one to believe that France is unaccommodating to Muslim immigrants, that evidence may not tell the entire story. The tough

ideological stance that France takes is counterweighted but other factors that make it conducive to integration. A Pew Research Center study released in July 2006 shows the French public warming to the idea of immigration from Muslim areas, this despite the highly public riots that embroiled the suburbs the year before. “Most notably, France shows no signs of a backlash in response to last year's riots. In fact, a counter trend seems to have emerged with slightly more French people saying that immigration from the Middle East and North Africa is a good thing than did so a year ago. The French public is also more inclined this year to say that Muslims living in France want to adopt French customs - a view held by an overwhelming majority of Muslims in France.”¹⁹ According to that survey, 58% called this immigration a “Good Thing” in France, while 34% of Germans felt the same way. Perhaps more tellingly, when asked about worries of Islamic extremism France had the lowest number of all the countries measured; the UK was the highest. The most important finding with regard to integration was the question of allegiance. Muslims in each country were asked what that they consider themselves first -- a French/German/Brit or a Muslim. France showed the greatest balance. 42% said country while 46% said Muslim. Only 13% of German Muslims and a mere 7% of British Muslims cited country first. Such studies not only indicate that the French people are more accepting of the Muslims in their country, but also that there is a correlation between willingness to assimilate with positive views. The studies also indicate that the French Muslims are much more likely to view themselves as French even in the face of a number of barriers to entry into French society.

¹⁹ “Muslims in Europe: Economic Worries Top Concerns About Religious and Cultural Identity,” Pew Global Attitudes Project. July 6, 2006.

Such a stark contrast between seemingly unaccommodating national policy and relatively high feelings of belonging do appear counterintuitive. Discrimination and racism are also a crucial part of explaining this paradox. Earlier it was noted that discrimination laws are more highly developed in France than most other European countries. Yet, racism remains a problem in France as it does in nearly every European country with a significant Muslim population. In a 1996 CSA poll, 56% of foreigners living on French soil and 61 percent of naturalized French citizens deemed racism "a threat" whereas indigenous French citizens did not share this concern: only 27% of them mentioned racism as a major problem. Both groups, however, shared a wide consensus that North African Muslims are the main victims of racist behavior – that opinion was expressed by over two-thirds of all French citizens. In France, data on racist violence and crime is collected by the police and entered into the ‘STIC’ database but data collection on anti-Muslim incidents is not required. Consequently, police databases reflect only a partial account of reports where the victim’s origin or religion might be counted; 131 such incidents were reported in 2004 and 65 in 2005.²⁰ Still, foreigners in France repeatedly believe that despite some of these factors, like Islamophobia, they are welcomed by the French people. A 1995 Louis Harris poll for *Valeurs Actuelles* showed 71% of all Muslims living in France felt welcomed by the French. French Muslims also share a more favorable view of “Westerners” – in nearly every category, including generosity and tolerance, French Muslims ranked Westerners higher than British Muslims.

Unrest and lack of integration have been shown to be more closely linked to socio-economic realities than to religious affiliation. The riots in 2005 were fueled not religion but by a sense of alienation, particularly among French youth reacting to considerable socio-economic imbalances.

²⁰ Muslims in the European Union: Discrimination and Islamophobia,” EUMC. 2006.

Endemic poor living conditions, joblessness and discrimination continue to breed discontent. In fact, the unemployment rate for North Africans is double that of the general population (10%) and in some of these urban ghettos unemployment is as high as 40%.²¹ And while officially racism and discrimination are strictly forbidden, the reality paints a different picture. Immigrants and their children are often victims of discrimination in job hiring, of rampant police profiling and of bias in securing loans. These communities are also shunted into the outskirts of large cities in housing projects where the ghetto phenomenon foment existing problems. That said, many French Muslims are moving into the middle class or even upper class and a growing Muslim presence is felt in the liberal and learned professions, especially in the area of medicine. Dalil Boubakeur, head of the Great Mosque in Paris, is a respected physician both within and outside his community.

Although the French have shown an ability to integrate the Muslim population better than others, violence has historically been a problem. The French experience with modern terrorism dates back to the 1960s. Attacks on French soil have come from assailants of Algerian, Basque, and Corsican descent. In 1994, French police thwarted an attempted hijacking of an airliner at the Marseille airport by Islamic terrorists who intended to crash the plane into the Eiffel tower – the most iconic symbol of the French Republic. Then in September 1995, Algerian militants belonging to the Armed Islamic Group (GIA) bombed the Paris metro. The response of the French government was immediate, and as other European countries like Spain and the UK struggle with terrorism, the country has been largely conflict-free.

²¹ Wyatt, Caroline, “Expulsions fuel French Muslim fears,” BBC News. May 31, 2004.

One quality that sets French Muslims apart is the degree of shared values with the general population. An Agence France Presse poll from 2006 demonstrated that most French Muslims share most of the values common to the French people as a whole. For instance, a large majority of French Muslims support sexual equality, free choice in religion and the separation of church and state. In addition, 91% said they supported male-female equality. Approximately 73% also agreed with the French separation of church and state, somewhat surprising given the contentious nature of the headscarf ban in 2004. Such feelings point to a French Muslim community that is both more in tune with Western ideals and more willing to adopt these ideals than many of their European counterparts. The reason for this trend may be a question of cause and effect: do French policies require it of them or do they choose France because they already share these opinions?

VII. ACCOMMODATION: UNITED KINGDOM

The UK's approach to integration is ideologically very different from France. The British policy towards integration is encapsulated in multiculturalism – a belief that tolerance and integration can exist while also allowing immigrants and specific minority groups to retain their distinct cultural and religious traditions and identities. Since the 1960s, the UK has embraced diversity and maintained an accommodationist stance; multiculturalism was simply the mechanism to deal with that growing diversity.

But that multiculturalism, some have argued, has had a number of unintended effects. Disconnected groups have used the freedom created by these policies to further entrench their position. A common refrain has been that by promoting individual or community identities, the

UK has forsaken the development of one, unified British identity. Such objections to the multicultural approach were heard before the loud reverberation of the high-profile London bombings in 2005. The implication is that while the general policy of multiculturalism has promoted a genuinely forward looking view of society and a willingness to incorporate Muslims into a larger British cultural tapestry, that same policy ignores the deep socio-economic divides that separate these groups.

An article from *The Times* highlights the difference between first generation Muslim immigrants and the generations who are now responsible for the terror attacks and other unrest in the country. The author argues that change is not so much about discrimination as it is about how these groups view themselves in relation to the rest of the country. "The first generation of immigrants faced greater hardships and more intense racism than today's Muslims do. Yet most thought of themselves as British and were proud to be here."²² This shift, he says, owes to changing perspectives: "the idea that we should aspire to a common identity and a set of values has been eroded in the name of multiculturalism." He fine tunes his point saying, "Multiculturalism as a lived experience enriches our lives. But multiculturalism as a political ideology has helped to create a tribal Britain with no political or moral centre."²³ Identity for these groups is being formed through shared plight.

The paradox of multiculturalism can be framed by how Muslims and the general population view assimilation. A BBC survey following the 2005 London bombings indicates a disconnect

²² *Id.*

²³ Kenan Malik, "Multiculturalism Has Fanned the Flames of Islamic Extremism," *The Times* (London), July 16, 2005.

http://www.timesonline.co.uk/tol/comment/columnists/guest_contributors/article544443.ece

between the amount of assimilation expected by the public as a whole and Muslims themselves. In that poll, 58% of those surveyed believed that people who immigrate to Britain should adopt its values, traditions, and way of life; only 28% of Muslims agreed with the same statement.²⁴ In perhaps a tempering of this broad acceptance of divergent cultures, then Prime Minister Tony Blair reflected a more moderate stance, “We know British Muslims, in general, abhor the actions of the extremists. We acknowledge once again Muslim contribution to our country and welcome it. We welcome those who visit our country from abroad in peace, welcome those who know that in this country the respect and tolerance towards others which we believe in, is the surest guarantee of freedom and progress for people of all religious faiths...But coming to Britain is not a right, and even when people have come here, staying here carries with it a duty. That duty is to share and support the values that sustain the British way of life.”²⁵

Immigration policy in the UK is by most measures is more liberal than France. But it is also changing in a more conservative direction. Britain until recently had unrestricted Islamic immigration, with 46% of the Muslim population being British born. In light of numerous Muslim-based terror attacks on British soil, the basis of this multicultural policy takes on new meaning. With the threat of extremism ever present, Britain reversed an open stance toward refugees in 2005 by limiting the amount of refugees admitted per year. The proposal faced fierce criticism, as many in the country believed it would be wrong to turn away potential legitimate refugees. Still, even as France has consistently moved away from immigration from North

²⁴ “Muslims 'want sermons in English',” *BBC News*, August 11, 2005. Accessed from: http://news.bbc.co.uk/2/shared/bsp/hi/pdfs/multiculturalism_poll_11_08_05.pdf

²⁵ PM s Press Conference – 5 August 2005. Accessed from: <http://www.number10.gov.uk/archive/2005/08/pm-s-press-conference-5-august-2005-8041>

Africa, the UK does continue to promote the ideal of cultural diversity. Officially, at least, the UK welcomes Islamic immigration generally, so long as it is monitored.

The path to citizenship also reflects the larger policies of accommodation. The majority of British Muslims hail from former British colonies including Pakistan, Bangladesh and India. In what may be another telling example of the new direction in immigration policy, the UK has begun to revamp its citizenship requirements. In 2004 new nationality laws required all immigrants seeking British citizenship to demonstrate some proficiency in the English language in addition to knowledge of its history, customs and culture. This requirement now includes a points system – one can, for example, earn points either by taking a short test or by taking a government-approved class.²⁶ The shifting importance of allegiance and assimilation is reflected in a newly introduced and a mandatory citizenship ceremony. Those who wish to acquire British citizenship must swear allegiance to the Queen as well as adhere to the central rights and freedoms espoused by the nation. Although the government has made it clear that these new requirements are about ensuring that all new citizens may become fully functioning – indeed integrated – members of society, it also signifies what some call a subtle departure from previous policies. Tariq Modood put it his way: “Indeed, although there is currently a rhetorical repositioning under way towards a more ‘civic’ conception of British citizenship, this does not indicate—and has so far not resulted in—an abandonment of recognizing and supporting ‘difference’, either in governmental literature or policy.”²⁷

²⁶ Meer, Asar & Modood, Tariq, “Islam and British Multiculturalism,” GLOBAL DIALOGUE, Volume 9, Number 3–4 . Summer/Autumn 2007.

²⁷ *Id.*

Such requirements have also moved into the religious sphere. At the same time as the new citizenship requirements took effect the government announced that all foreign “ministers of religion” – including imams, must demonstrate a basic command of English. The policy was well received, in particular among moderate Muslim leaders who claim that English skills are essential for imams to carry out their duties, not only as preachers but as community leaders and counselors.²⁸ Today, many Muslim leaders believe that the efforts to train domestic imams are failing. Musharraf Hussain, a government adviser on mosques, claims that said the country’s Islamic seminaries are producing “‘unemployable’ graduates who [are] incapable of challenging the sense of alienation that [lead] some Muslims towards violent extremism.”²⁹ These comments came amid tension between the government and four Muslim organizations over the government’s efforts to curb extremism by regulating some of their practices, including making mosques more accessible to women.

Currently, Britain does not have prohibitions on the wearing of veils or other blatant outward expressions of Muslim religious identity. In this way the UK lives up to its multicultural ethos. But equal opportunity and accommodation of the specific needs of the Muslim community remains a problem in many ways. Claims against the government on the topic of accommodation have fomented around education. According to one report, “Conflict in Britain has crystallized on the question of whether the state education system will fully finance private Islamic schools under the same conditions that apply to Christian and Jewish ones.”³⁰ Muslim parents are vocally pushing for more state-funded Islamic schools. The rationale for these communities is two-fold:

²⁸ “British imams ‘failing young Muslims’,” *The Times Online*. January 7, 2008.

²⁹ *Id.*

³⁰ Fetzer, Joel S. & Soper, J. Christopher, *Explaining the Accommodation of Muslim Religious Practices in Western Europe*, Cambridge University Press. Date Unknown.

some believe racism and lack of recognition of their children's faith identities has contributed to poor educational performance. Others object to their daughters, in particular, being exposed to the more liberal social mores in public schools. The idea of creating more Muslim schools was supported by the Blair administration as part of a program to promote choice. But the divide is also widening. According to one study, "The growing separatism is most sharply seen in schooling. Nearly half the Muslim respondents say that, given the choice, they would send a child of their own to a Muslim school rather than a state school."³¹ Currently only 5% of faith-based schools are Muslim, while the majority are Christian. Although Muslims view increased funding for schools as a sign of recognition by the government, some wonder if this will only serve to promote self-segregation and work against integration in the end.

VIII. INTEGRATION: UK

The analysis thus far has shown British multicultural policies to be uneven, while the Muslims living within their borders appear unable to integrate as well as in France. Civil unrest and terrorism point most glaringly to integration difficulties. A series of terrorist plots, a number of them homegrown, have occurred on British soil over the past ten years. Terrorist activities perpetrated in other areas have also gained momentum in England. Most recently, a number of U.S. officials have placed blame on British authorities for creating a situation that allowed for the radicalization of would-be airline bomber Umar Farouk Abdulmutallab. Critics in the U.S. cite the "ghettoization" of Muslims in Britain and a concomitant dearth of integration. According to Charles Allen, a recently-retired veteran CIA officer who was intelligence chief at the Department of Homeland Security under former President Bush: "The British have an immense

³¹ Travis, Alan. "Desire to integrate on the wane as Muslims resent 'war on Islam,'" *The Guardian*. March 16, 2004.

problem. There are more challenges in Muslim immigrants integrating into British society than there is in America, a lack of assimilation, a great deal of alienation.’ ”³² The London subway bombings in 2005 were another high-profile terrorist attack. The plot was planned in the UK and the assailants were mostly homegrown. Of the four bombers, three were of British Pakistani decent. Today the overall threat of terrorism in the UK remains unnervingly high. According to a speech by MI-5 Director-General Jonathan Evans in November of 2007, the organization had identified over 2,000 al-Qaeda-inspired terrorist suspects on UK soil and had estimated there were probably another 2,000 unidentified individuals who also posed a terror threat.³³

Gaping socioeconomic inequalities are the most salient example of the great divide between Muslims and the larger British population. These inequities point to a fundamental separation between these communities, and have a direct impact on everything from crime, to terrorism to achievement. Numerous studies indicate that Muslims are the most disadvantaged faith group in the British labor market. Levels of unemployment are significantly disproportionate – approximately 15% of Muslims cannot find jobs compared to a national rate that, before the financial crisis, hovered around 5%. In 2004, Pakistani women had the highest unemployment rates in the country at 20%.³⁴ In a Gallup Poll from May 2009, 70% of Muslim respondents agreed that finding a job is necessary to integrate. But taken as a group, the Muslim employment rate is 38% -- a worrisome number given its importance in promoting a unified society. Further, the sectors in which these groups can attain a job also separate them as well. Muslims in Britain are frequently shunted into in certain low-paying sectors of the economy, such as the hotel and

³² Harnden, Toby, “Americans blame Britain for rise of Islamic extremism,” *Daily Telegraph*. May 4, 2010.

³³ Gardiner, Nile & McNamara, Sally. “Britain: A Hornet’s Nest of Islamic Extremism,” *Heritage Foundation*. November 9, 2007.

³⁴ Source: Office for National Statistics <http://www.statistics.gov.uk/cci/nugget.asp?id=462>

restaurant industry.

Inequities are found in educational achievement as well. In some ways, access to quality education remains the most public source of disparity and of discontent. The UK only collects educational data along ethnic lines but the results are still illustrative. Pakistani and Bangladeshi students fall below the national average. And, despite numerous initiatives by the government to create programs that would lift disadvantaged groups, Muslim critics argue that most of the educational initiatives focus on immigrants of African or Caribbean descent and do not address the specific challenges, and reasons for underachievement, of Muslim students.

What emerges from this analysis is a greater willingness on the one hand to grant religious and cultural freedoms, but not in the meaningful extension of certain rights and protections. Racism and discrimination continue to loom large within British society, this despite a national policy of multiculturalism. Notably, “Britain has refused to extend the law against racial discrimination in employment, housing, and education to include religious discrimination, a key concern for Muslims.”³⁵

Equal treatment by law enforcement authorities and equal application of these new laws more fully capture the integration scene. Many British Muslims cited a dramatic uptick in racial profiling following the London bombings. And over the past decade, human rights groups have perceived that the balance in the UK between civil liberties and security has been shifting away from the former. As noted earlier, the UK has some of the toughest and most overarching anti-

³⁵ Fetzer, Joel S. & Soper, J. Christopher, Explaining the Accommodation of Muslim Religious Practices in Western Europe, Cambridge University Press. Date Unknown.

terrorism legislation in Europe. In 2005, for instance, the British House of Commons extended the time suspects can be held without charge to 28 days. The effect of such policies is to push Muslims toward the fringe of society. A March 2004 opinion poll of 500 Muslims in the UK found that more than two-thirds believed that British anti-terrorist laws were being used unfairly against the Muslim community. The survey also confirmed a *Guardian/ICM* "snapshot" in June 2002, finding that one person in three reported personally experiencing hostility or abuse because of their religion. Further, most of these respondents believed that community relations had worsened since the Iraq war.³⁶ The statistics also bear this out. According to official data collected by ethnicity, there was an uptick of arrests of whites by 118% following the passage of tougher anti-terrorism laws in 2004. Over that same time arrests of Asians increased by 302%.³⁷

A BBC News report following the London bombings also painted a bleak picture of relations between Muslims and rest of the country. In the three weeks following July 7, 2005 there were 269 religious hate crimes compared to 40 in the same period the year before. According to a BBC News report, "Met Police Assistant Commissioner Tarique Ghaffur said he had never seen so much anger among young Muslims ... he warned: 'It can lead to these communities completely retreating and not engaging at a time when we want their engagement and support.'"³⁸ And while affirmative action policies are a cornerstone of the American system to promote parity in employment and education, the UK, like France, relies heavily on laws to

³⁶ Travis, Alan. "Desire to integrate on the wane as Muslims resent 'war on Islam,'" *The Guardian*. March 16, 2004.

³⁷ "UK Police Stop and Searches Under Anti-Terror Law in 2004," *Privacy International*. May 7, 2004.

³⁸ "Hate crimes soar after bombings," BBC News. August 4, 2005.

prohibit discrimination. Still, Muslims in the UK believe their rights are hamstrung by the UK Race Relations Act, which still does not provide a legal protection against discrimination based on faith in the areas of education, training and housing among others.

IX Conclusions

In detailing the different policies and experiences between France and the United Kingdom, the central premise of this paper -- that France is both less accommodating of, yet integrates better, Muslims into the larger fabric of its society -- holds generally but not absolutely. To be sure, the overarching goal of French policy is assimilation and most recent laws show that policymakers intend to continue that trend. At the same time, however, the British ethic of multiculturalism is not as strong as it once was, perhaps owing to a belief that such wide latitude for the many Muslim voices within the country may do harm in some unintended ways. This is the first central finding of the research. Perhaps the relative iron fist with which the French government maintains its stance -- that religion be tightly monitored and that immigrants must adapt to the French view of the world -- promotes greater adherence to these values and promotes integration. This is a corollary to one of the central hypotheses presented originally: immigrants are, to some extent, self-selecting. The number of immigrants of North-African descent has increased over the past decade in France despite the prevalence of high-profile and controversial laws like the headscarf ban. Immigrants who choose to come to France do so knowing that more than other places -- like the UK -- they will be expected to assimilate, to become fundamentally French. By the same token, the absence of enforced solidarity in the United Kingdom may leave immigrants with nothing else to hold on to but their Muslim identity. British policy is, on the surface,

accepting of minorities, but the evidence presents a more nuanced picture. Despite good intentions by the government, the Muslim population is being pushed more and more into economically depressed ghettos. In this context, more radical elements are using the room provided by multiculturalism to indoctrinate young Muslims into their fold.

At the outset, it was also hypothesized that there might be a “fraternity effect” at work. When barriers to entry are high for any organization – whether it is a college fraternity or a country – the members tend to value it more. In the British case, the immigrants have traditionally been required to do little to demonstrate their allegiance to the nation and its values. French citizenship requirements, as detailed above, have been and remain tight. Now, even tourists of Muslim decent must meet strict standards if they want to enjoy the privilege of even being *in* France. The studies cited in this text show that the French population value assimilation, and French Muslims want to be assimilated – at least compared to their European counterparts. This overlap appears to explain part of the accommodation-integration paradox.

Another important distinction between the two nations is the origin of their Muslim populations – in each case originating from former colonies. French immigrants hail primarily from Algeria (43%), Morocco (28%) and Tunisia (11%).³⁹ Most Muslim immigrants in Britain originate from Pakistan and Bangladesh. These populations are all Muslim but one cannot discount the effect that country of origin may have. The 2006 Pew Poll highlights how fundamental the views of French Muslims differ from those in the UK. According to the study what most distinguishes French Muslims among others in Europe are their self-perceptions. Few Muslims living in

³⁹ Tribalat, Michele, “Counting France's Numbers -- Deflating the Numbers Inflation,” *The Social Contract Press*. Volume 14, Number 2. Winter 2003-2004.

France see a natural conflict between being a devout Muslim and living in a modern society. 72% perceive no such conflict; a view shared by a virtually identical 74% of the French general public. 34% of the UK population said the same. When Muslims in France were asked if they want to either be distinct from the larger culture or to adopt its customs, nearly 80% of French Muslims said they want to adopt French customs. This high preference for assimilation compares with that expressed by 53% of Muslims in Spain, 41% in Britain and just 30% in Germany. In Great Britain, however, Muslims split evenly-- 47% see a conflict versus 49% who do not. What might be most striking is the difference in these Muslim group's views of other religions. According to the study, "French Muslims top the general public in the United States and France in favorable ratings of Christians (91% of French Muslims vs. 88% of Americans and 87% of the French take that view). Fully 71% of French Muslims express a positive view of people of the Jewish faith, compared with only 38% of German Muslims, 32% of British Muslims."⁴⁰ This data indicates that the Muslims populations in these countries may easily be as different from each other as the accommodation-assimilation policies of their host countries.

X. POLICY IMPLICATIONS

With borders disintegrating and immigration levels rising throughout Europe, the phenomenon of what Harvard's Joselyne Cesari calls a "cultural malaise" goes beyond the Muslims themselves. Going forward countries may need to reassess the very notion of what a European or national identity is. France and the UK offer decidedly divergent perspectives and both continue to swim against the integration current. At the same time, it is unclear whether either policy – accommodation or integration – adequately respects, and encourages, the right of Muslims in these countries to freely practice their faith without fear of restriction or retribution.

⁴⁰ Allen, Jodie T., "The French-Muslim Connection: Is France Doing a Better Job of Integration than Its Critics?," Pew Research Center Publications, August 17, 2006.

This comparison of accommodation and integration confirms the argument made by Justin Vaisse, a fellow for European Studies at the Brookings Institution, that the discourse on Muslim integration should concentrate not on religion but on finding broad socio-economic solutions. Some reforms are simply practical: schools should highlight the Muslim contributions to society while the rhetoric from both politicians and media must shift the focus away from profiling Muslims as a separate group. Both of these changes would affect the tone in these countries and promote greater integration and assimilation.

This study has also made clear that Muslim populations vary significantly between countries and even within them. Efforts to monitor radicalism must combine sound intelligence within communities with well-informed policymakers who understand these distinctions.

Ultimately, though, social justice is a long-term investment by governments that makes possible respect for religious freedom. While the individual circumstances of the nations that comprise the EU vary greatly, the ultimate goals remain the same. The EU and its socio-political entities can enforce religious freedom through an integrated approach that draws upon past and current lessons, and that is applied evenly throughout Europe.