Muslims and the State in Britain, France, and Germany

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Explaining the Accommodation of Muslim Religious Practices in Western Europe

The government has been telling us that we are citizens of this country, that we have equal rights. But when we ask for equal rights, for our own schools like other faiths have their own schools, the government tells us that they will be divisive, and that they will create a ghetto mentality. It is Islam that has been ghettoized by the Establishment.

> K. S. Butt (2001), chair of the Islamic Resource Centre, Birmingham

Muslims have become a part of this society. More than three million Muslims live in Germany permanently. They are not going to "go home." Their home is *here*.

> Nadeem Elyas (2001), chair of the Zentralrat der Muslime in Deutschland, Cologne, Germany

Today, a French person is not necessarily Catholic, Protestant, etc. Otherwise, a French person would have a beret, a baguette – those are stereotypes. Today a person is French through an act of citizenship, by sharing certain common values and by [supporting] everyone's right to find happiness. . . . But in the end a French person can be a Muslim, can be a Catholic, can be a Jew, can be a Buddhist. . . . [Muslims should enjoy religious liberty] just as other [French] citizens do.

> Saïda Kada (2001), president of Femmes Françaises et Musulmanes Engagées, Lyon, France

STATE ACCOMMODATION OF Muslim religious practices is an increasingly important political issue across Western Europe. More than ten million Muslims currently live in Western Europe, which makes them the largest

religious minority in the region. Islam is the third largest religion overall, and in most West European countries, it is growing much faster than the historically dominant Catholic and Protestant churches (Hollifield 1992; Nanji 1996; Nielsen 1999). In Germany, there are an estimated 2,200 mosques or Islamic prayer rooms, most of which have been organized in the past decade but which are still insufficient to meet the religious needs of Muslims in the country (Kusbah 1997; Spuler-Stegemann 1998:150). There are nearly as many religiously active Muslims as Anglicans in England and Roman Catholics in France (Brierley 2001; Caldwell 2000). Islam is a significant social and religious force in Western Europe.

The quotations at the beginning of this chapter suggest that Muslims want the state to recognize their religious status and accommodate them justly and fairly. As we will demonstrate in the pages ahead, however, what states view as equitable treatment for Muslim citizens and immigrants, what they consider to be reasonable and just in terms of accommodating Muslim religious practices, and how governments pursue the twin policies of recognizing the religious rights of Muslims while insuring their effective incorporation into the values of the host country vary widely in Western Europe. Although states face similar challenges, there is a notable cross-national divergence in policy related to how and whether Western European states recognize and accommodate Muslim religious practices. The aim of this book is to explain how three European states – Britain, France, and Germany – have accommodated the religious needs of Muslims, and to explain why there is such a difference in how they have done so.

Background

Muslims began immigrating to Europe in large numbers following the Second World War. They were part of a great wave of immigration that brought workers from the poorer countries of the Mediterranean, Eastern Europe, and the former colonies to the industrialized states of the West that were enjoying an economic boom and trying to rebuild in the war's aftermath. Private employers and governments across Western Europe actively recruited foreign workers to provide the labor necessary to continue the economic expansion (Bade 1983:59–95; Frémeaux 1991:209–75).

In the face of the economic recession of the early 1970s, however, European states gradually closed their borders to low-skilled workers but allowed for the possibility of family reunion and political asylum. Host countries assumed that immigrants were temporary workers who would

want to return to their country of origin, but many foreign-born residents had no interest in doing so. Ironically, this effort to restrict immigration had the unintended consequence of encouraging a "second wave" of immigration as family members and dependents of the original postwar economic migrants joined their families in Western Europe. This policy transformed the immigrant population from single migrants to families who wanted permanent settlement (Boyer 1998:87–104; Kettani 1996; Nielsen 1999:25–35). Since many of these immigrants were Muslims, the Muslim population in Western Europe expanded rapidly.

Family settlement also changed the political calculus; immigrants became concerned not simply with their political and economic rights as workers, but also with their cultural and religious needs as permanent residents or citizens. Vexing policy questions emerged related to the religious rights of Muslim immigrants and citizens. Governments were suddenly confronted with such issues as how or whether to accommodate Muslim religious practices in state institutions such as schools, prisons, and hospitals; how or whether to develop their communities; whether to pass laws specifically designed to protect Muslims against religious discrimination; and what efforts to take to stem native discrimination against them (Cesari 1997; Morsy 1992; Nielsen 1999:36–46; Özdemir 1999:244–59).

The result in every country in the region has been political controversy around issues of Muslim religious rights. 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. Germany has contended with the question of how or whether to grant public corporation status *(Körperschaft des öffentlichen Rechts)* to Muslims as well as to Christians and Jews. Such a status would signal that Islam is a part of the country's religious landscape and allow Muslims' social welfare organizations to receive state funds. France annually struggles with the question of whether or not Islamic girls will be allowed to wear the *ḥijāb* in public schools. Each of the states has witnessed negotiations over such contested practices as regulations on building mosques and policy regarding the religious needs of Islamic workers. Finally, there is a vibrant debate in each of these countries on what the goals of public policy toward Muslims ought to be. On the one hand, governments sometimes pursue policies that encourage Muslims to assimilate themselves to the values of Western society, even when that means abandoning some of the particular features of their religious identity. At other times, states have encouraged Muslims and others to celebrate religious diversity and for Muslims to maintain their most deeply held religious values.

These concerns became more acute in the aftermath of the attacks on the World Trade Center in September 2001 by Muslim extremists. The realization that many of the terrorists in those attacks had lived and trained among a network of coreligionists in Western Europe raised significant questions among political leaders on how best to ensure the successful incorporation of Muslims into the values of a liberal democracy. Jean-Marie Le Pen of National Front scored a surprising electoral victory in France's presidential primary election of 2002, and the British National Party won its first two victories in over a decade in city council races that same year. In both cases, these far-right parties ran on anti-immigrant and anti-Muslim political planks. Governments throughout the region passed more restrictive immigration and asylum laws. Those policies are particularly salient to Muslims, who make up the largest percentage of immigrants and asylum seekers to Western European countries. What is clear is that disputes about the Islamic religion and Muslims are increasingly prominent in Western Europe.

While European states have faced a common set of challenges in accommodating the religious needs of Muslims, they have taken substantially different approaches in their accommodation of Muslims' religious practices. Britain[1] led the way in tightening immigration controls in the early 1960s and limiting the citizenship opportunities for residents in its former colonies. In more recent years, Britain has refused to extend the law against racial discrimination in employment, housing, and education to include religious discrimination, a key concern for Muslims (Islamic Human Rights Commission 2000), and the Blair Labour government has proposed a bill that would make it more difficult for immigrants and asylum seekers to gain citizenship (Hoge 2002).

At the same time, however, the state has been fairly open to accommodating the cultural and religious needs of Muslims (Spencer 1997). Britain embraced multiculturalism in state-supported schools in the 1970s; the curriculum in required religious-education classes includes an extensive treatment of not only Christianity, but also Judaism, Islam, and Sikhism (Keene and Keene 1997). When confronted with the issue of girls wearing the *ḥijāb* in state-run schools, British educational authorities quickly reached a compromise that allowed girls to wear the headcovering so long as it conformed with the color requirements of the school uniform (Liederman 2000). After

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[1] This book will consider policy regarding state accommodation of Muslims' religious practices in England, as opposed to the policy in all four regions (England, Northern Ireland, Scotland, and Wales) that make up the United Kingdom.

many years of trying to win state aid for Islamic schools under the same conditions that govern aid to Christian schools within the state system, the government in 1998 approved two independent Islamic schools (Howe 1998). A recent Green Paper on education encouraged an expansion of the faith-based school system to allow many more religious schools to receive state aid (*Schools* 2001).

France began to place greater restrictions on immigration in the 1970s; in the early 1980s, the state initiated what turned out to be a wholly ineffectual policy of subsidizing migrants' return to their country of origin (Weil 1991). Most of these laws were repealed in the late 1990s. The legislature also passed laws that made it marginally more difficult for immigrants and the children of immigrants to gain citizenship, although most Muslims in France are citizens.

In contrast to Britain, however, France has been far less accommodating to the religious needs of Muslims. France has rejected multiculturalism as an appropriate educational model in the state schools. Aside from such short lessons on the "Muslim world" as those in the *cinquième* history and geography class (Marseille and Scheibling 1997:24–39), French secondary school students learn nothing about Islam. Despite the popular impression that the *Conseil d'État*'s decision on the "Scarf Affair" resolved the issue (Cesari 1997:108–21; de Wenden and Leveau 2001:78–9; Gaspard and Khosrokhavar 1995), French Muslim leaders estimate that "hundreds" of Muslim young women have been expelled from public schools for refusing to remove the *ḥijāb* (Kabtane 2001; Merroun 2001). These young women are then forced to study by correspondence, rely on volunteer Muslim tutors, or abandon their education altogether (Kada 2001). This strict version of *laïcité* is the dominant view in the most powerful teacher unions (Berguin 2001), which is significant because teachers are public officials who implement policy in the institution where church–state conflict around Islam most consistently arises: the schools. The state has been vigorously secular and opposed to the notion that public institutions should be made to assist the religious practices of Muslims (Peach and Glebe 1995).

A third country, Germany, represents something of a hybrid of these state responses. Only a very small percentage of Muslims in Germany are citizens, and until President Gerhard Schröder's reforms of 1999, very few immigrants had the right to become German nationals. The state has also used various measures to encourage immigrants to return home, though these have largely been ineffectual. Finally, the German government has urged states in the European Union to tighten domestic immigration controls (John 2002).

On the other hand, Germany has been more willing than France to accommodate the cultural and religious needs of its Muslim population. The state has funded some Islamic social welfare and cultural organizations and established an Islamic school in Berlin (Doomernik 1995). In the state of North Rhine-Westphalia, moreover, education authorities have mandated the teaching of Islam in required religion courses in public schools, and have even gone so far as to write the required textbook. The clear intent of this decision is to encourage Muslims to learn more about their faith in the public schools, and to ensure that the version of Islam they are taught is fully compatible with liberal democracy (Gebauer 1986, 2001; Pfaff 2001).

There have been a number of fine studies of immigration into Western Europe (Castles and Miller 1993; Collinson 1993; Joppke 1999; Soysal 1994). These scholars have focused much needed attention on a phenomenon that has, in the words of one analyst, "been more transformative in [its] effect" in Western Europe than any other since 1945 (Messina 1996:134). These accounts, however, tend to focus on economic and citizenship issues and largely ignore questions of the religious identity and needs of Muslims. Social scientists, in short, have devoted very little attention to the religious aspect of Muslim policy demands, despite the fact that social and political tensions have mounted in recent years over a series of religious matters.

One reason for this silence on religious questions has been a perception among social scientists, often assumed rather than stated, that Western Europe is essentially secular and that issues of church and state are no longer relevant to public policy. According to this view, religious disputes were historically important in Europe, but those issues were largely settled, or at least minimized, in recent decades as the state became more secular and began to treat religious groups more or less equally. As we will demonstrate in the country chapters that follow, there is something to this thesis. Religion, which was at the center of political conflict in Europe a century ago, became less important politically in the middle decades of the twentieth century. However, the migration and settlement of large numbers of Muslims into Western Europe poses a new challenge to the existing church–state arrangements in countries and has resurrected somewhat dormant religious disputes.

Theories To Be Tested

How can we explain the disparate political responses to the religious concerns of Muslims in Britain, France, and Germany? What have these states

done in terms of public policy to accommodate the religious needs of their Muslim populations, and just as importantly, what explains the different state reactions? There is very little literature and no consensus on this central question, but there is a very rich literature on the policy-making process as it relates to immigration and citizenship policies in Western Europe that can be applied to our primary concern. The dominant theories in the field are resource mobilization that views politics as a contest of competing actors, with the outcome affected by their relative resources. Political opportunity structure theory analyzes how political institutions shape the way that actors advance their interests and the ensuing policies. Ideological theories contend that preexisting ideas about the nature and purpose of government impact the development of public policy. We argue in this book that each of these theories sheds some light on state accommodation of Muslim religious rights in Britain, France, and Germany, but that none of them sufficiently explains important differences among the countries. We contend that the development of public policy on Muslim religious rights is mediated in significant ways by the different institutional church–state patterns within each of these countries.

Resources and Muslim Mobilization

One common approach in the literature on immigration is to focus on the origin, ethnic composition, and organizational patterns of Muslim communities within a particular nation-state (Anwar 1995; Bistolfi and Zabbal 1995; Kepel 1997; Nielsen 1995; Penninx et al. 1993). These accounts explain a state's policy on Muslim religious rights by analyzing domestic political considerations and the relative power of parties and movements that support Muslim religious rights against those that oppose them. Borrowing implicitly from resource mobilization theory, these descriptions accent the role of resources in mobilizing Muslim groups in Western Europe and stress the organizational structures that link individuals into a social movement.

Resource mobilization theory emerged in the late 1970s as a deliberate attempt to correct the psychological models of collective behavior that dominated sociology and political science in the 1960s (Gamson 1990; Zald and McCarthy 1987). This theory rejected the assumptions of the prevailing explanations that held that collective action was a spontaneous and disorganized activity and that movement participants were essentially irrational. By contrast, resource mobilization theory assumed the rationality of participants in a social movement and focused on the capacity of organized groups to acquire politically significant resources for their collective purposes (Ferree 1992).

According to this interpretation, the most important barrier to a movement's success is a lack of resources. Mayer N. Zald and John D. McCarthy (1987:11) note that the "transformation of social movement theory rests upon the recognition that the mobilization of resources (labor, materials, and money) for collective action is problematic." While people might identify with a set of social or political goals, absent political resources, there will be no effective collective action on behalf of those group goals; successful movements are those that overcome the barriers to collective action. The key features of an effective social movement are, first, a skilled cadre of leaders who can translate the amorphously held values of the group into political capital, and, second, a well-established institutional structure from which group leaders draw resources to form new organizations. It is through these internal networks that leaders are able to raise resources and recruit members for social movement organizations.

As we noted previously, a number of scholars implicitly use the insights of resource mobilization theory to explain the political outcomes of movements for Muslim religious rights in Western Europe. A common theme in these accounts is that Muslim groups have been politically ineffective because they lack the resources necessary to bargain effectively with the state. Wasif Shadid and Sjoerd van Koningsveld note, for example, that "Muslims in most Western European states have thus far been unsuccessful in creating representative organizations at national levels which can function as spokesman for the Muslim communities with the respective government" (1996:3). It is the absence of a representative organization, in their view, that explains why Western European states have failed to respond to the political demands of Muslim immigrants and citizens. Ronald Kaye (1993) echoes this theme in his comparison of the politics of Muslim and Jewish groups in Great Britain. He notes that the Muslim community is larger than its Jewish counterpart, but that Muslim groups have not been as effective as Jewish ones at winning state concessions on the policy issue of the religious slaughter of animals. Kaye contends that Jewish groups have three significant political resources that are generally absent in the Muslim community: communal unity, coherent organizational resources, and the strategic placement of communal personnel in elite positions. It is the presence of these resources among Jewish groups, and the absence of them among their Muslim counterparts, that explains the different policy outcomes.

Several analysts also note that the existence of ethnic, religious, national, and linguistic divisions within the Muslim community acts as a barrier to their political mobilization in Western European nations (Amiraux 1996;

Scantlebury 1995; Vertovek and Peach 1997). In Britain, for example, Muslims are divided by nation of origin (India, Pakistan, Bangladesh, and various Arab countries), major branches of Islam (Sunnism and Shiism), and Islamic schools of thought (Deobandis, Barlewis, and Wahhabism). Muslim groups in Britain have organized dozens of political organizations, many of which claim to speak for the Muslim community, but given the internal divisions among Muslims, it has been difficult for any one of these groups to become an effective national group. The division of Muslim groups is so great that some scholars point out that "the term Islamic community is inaccurate, and is better replaced by the plural form, religious communities" (Rath et al. 1999:67). Steven Vertovek and Ceri Peach (1997:30) correctly note that government authorities across Europe use this apparent disunity as a way of "refusing to respond to Muslims' socio-political overtures."

Muslims in Western Europe have for the most part failed to produce a native-born leadership, relying instead on religious and political leaders who are themselves immigrants or foreign born. An estimated 95 percent of all imams in France, for example, come from abroad (Le Breton 1998). The same appears to be the case for religious leaders in other West European countries as well (Cherribi 2001). The absence of native-born clergy and group leadership almost certainly means that Muslim groups lack key resources, particularly information about how best to use the political system to their advantage.

Finally, Carolyn Warner argues that there might be something endemic in "the structure and ideology of Islam itself" that limits the mobilization of the Muslim community; there is no counterpart in Islam to a Christian church, no formally instituted body to supervise the religious and political agenda for Muslims (1999:5). Warner claims that the absence of this religious hierarchy, particularly among Sunni Muslims, makes it difficult to organize the Muslim community as a whole. Individual mosques are important places of political mobilization for the Muslim immigrant community, she argues, but because they are locally controlled, often led by persons who are not themselves clerics, and frequently led by foreign-born imams, the capacity of Muslims to form a well-organized national political movement is limited.

Much can be said for using the insights of resource mobilization theory to explain the politics of state accommodation for the religious rights of Muslims in Western European nations. To the extent that there is disunity among Muslims (which is not surprising given their diverse origins), it does act as an obstacle to forming powerful organizations for collective political action. Our account of how European states have responded to the religious

needs of Muslims will thus pay attention to internal dynamics within the Muslim community that have limited its capacity to form organizations and bargain effectively with the state. On the other hand, a focus on resources alone is not enough to explain why states have responded as they have to the policy demands of Muslim immigrants. As we noted previously, Britain has been more generous in accommodating Muslim religious demands than has France. According to resource mobilization theory, the reason for this difference would have to be that British Muslims have had group leaders with access to some set of significant political resources that French Muslims have lacked. A closer look at the politics of Muslim groups in the two countries, however, will reveal that this is not entirely the case. The British Muslim community is smaller than the French one, it is no better organized, it does not enjoy a unified cadre of leaders, and it has failed to establish a single national political organization to represent the interests of Muslim immigrants. While divided in some important respects, Muslims in France are organized into central political and religious organizations through the Paris Mosque, the Union of Muslim Organizations, and the National Federation of French Muslims (Kusbah 1997). Yet it is Muslims in Britain, not France, who have won key concessions from the state. The reason, we will argue, has less to do with resources than with opportunities provided, or not provided, by the existing institutional structure of church and state in each state.[2]

Political Opportunity Structures and Muslim Mobilization

A second common approach in the literature on how European states have responded to the religious policy demands of Muslims focuses less on political resources and more on political institutions. Borrowing from political opportunity structure theory, this explanation highlights the direct and indirect ways that state officials and institutions influence the capacity of groups to engage in collective action, and examines the policy outcomes that follow from that political mobilization (Evans, Rueschemeyer, and Skocpol 1985; McAdam 1982; Tarrow 1998). The theory contends that key regime characteristics – such as whether it is a unitary or federal polity; the type of electoral system; the separation of powers between the executive,

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[2] A resource mobilization theory also has the disadvantage of lending itself to arguments that have the flavor of blaming the victims of discriminatory treatment (Muslims in this case) for their political situation. The unstated assumption of such theories is that the Muslims would be better served if they were more like Christians.

legislative, and judicial branches of government; and the position of key political elites – all channel the politics of social groups.

There are two ways in which state structures are seen as important in the politics of Muslim groups. First, inherited political institutions influence the political activism of groups in specific ways. Ruud Koopmans and Paul Statham (2000:34) point out that a state's "institutional dimensions define the available channels of access" for groups like Muslims who want to challenge the polity. Jeroen Doomernik (1995:53) argues that "there is a direct connection between the institutionalization of the immigrant culture and what the host country's legal system allows." The political concentration of power in France, for example, means that Muslims must take their case to national political institutions if they are going to be effective. Claire Dwyer and Astrid Meyer (1996) similarly conclude that the institutionalization of Islam in Europe appears to depend on the ways in which the existing legislation can be utilized by Muslim groups. In a related vein, Virginie Guiraudon notes that "the character of the institutions responsible for migrant policy is important – whether they are centralized, parapublic, unitary, politically insulated, or under judicial scrutiny – and whether consultation with interest groups is institutionalized" (1998:295). The most important of those institutional variables for immigration politics include "the immigrants' legal situation; their social and political rights; and host society citizenship laws, naturalization procedures, and policies in such areas as education, housing, the labor market, and social assistance that shape conditions and immigrants' responses" (Ireland 1994:10). Jeannette Money focuses on the electoral process to explain divergent state policies on immigration. She contends that politicians make public policy, but that they face different incentives and electoral pressures when they do so. A geographic concentration of immigrants necessarily invites local concerns about immigration policy, but "the dynamics of the political competition funneled through British political institutions catapulted immigration controls onto the national agenda much earlier there" (1999:104).

Not only are institutions important in shaping how groups are politically active, they are also significant in determining whether groups achieve their goals. The reason for this is that the political structures of some nations are more amenable than others to the policy changes sought by Muslim groups. Patrick Ireland (1994), for example, examines immigration politics in France and Switzerland, with a particular focus on the impact of France's unitary polity compared to the effect of the Swiss federal political system. He argues that the political centralization of power in the French state forces immigrants to aim for national legislation to win state concessions;

the difficulty of that prospect, however, has meant that immigrants have had little policy impact. The Swiss federal system, by contrast, allows Muslim groups to mobilize at local levels, where their power is concentrated; the result is that they have gradually been able to win more policy victories.

Romain Garbaye (2000) highlights a similar dynamic in his comparison of the politics of ethnic conflict in Birmingham, England, and Lille, France. Garbaye notes that Birmingham city officials worked closely with ethnic groups and took their demands seriously because Britain's party system and parliamentary style of government empowers organized groups at the local level. The more centralized French party structure and presidential system, by contrast, allowed city leaders in Lille effectively to ignore ethnic groups in the city. The support or opposition of key political elites to Muslim demands can also affect a movement's outcome.

To the extent that British Muslims have won policy concessions that their French or German counterparts have not, therefore, a political opportunity structure theory might well argue this is a result of the different political opportunities afforded Muslims in the two countries. To take one example, because of very different citizenship laws in the two countries, a much higher percentage of British Muslims are citizens than are German Muslims. Because they are more likely to be citizens, British Muslims have myriad political opportunities for activism at their disposal. They can, for instance, participate through conventional political channels (voting and running for elective office), and existing parties have an incentive to make direct electoral appeals to them. German Muslims, by contrast, are less likely to be citizens, they cannot as effectively participate through conventional politics, parties have limited reasons to make appeals to them, and they even face the threat of deportation if they engage in unconventional political activism (Guiraudon 1998; Nielsen 1992; Peach and Glebe 1995). Given those political opportunities, therefore, British Muslims are likely to be more effective politically than their German counterparts.

One of the chief advantages of a political opportunity structure theory is that it is inherently comparative. The question that we posed at the beginning of this chapter as the focus of our study – why states have responded differently to the religious needs of Muslims – calls for such a crossnational approach. It is apparent that Muslim citizens and permanent residents in these three countries have identical goals; they want to build mosques for public worship and establish religious schools to transmit the faith, and they want the state to make the concessions necessary so that they can practice their religion. What is different across Western European states is how states have responded to those religious concerns. There is much to be gained in using political opportunity structure theory to focus on the

institutional reasons for those differences. What we will contend is that political opportunity structure theory is not wrong for our purposes, but that it is limited in two key respects. First, the theory has not yet been applied to the question that we are principally interested in answering in this book; second, the theory has not fully recognized that religious institutions are a part of the state structure and that they have been central in shaping the politics of Muslim groups.

While there are some exceptions (Nielsen 1999), few analysts of Western European immigrants have focused much on the *religious* needs of the groups in question. Instead, state structural accounts have paid attention to immigrants' political rights, citizenship claims, labor demands, and civil rights and liberties. What we will argue, however, is that Muslim religious rights and needs are a key component – perhaps *the* key component – of their political demands. Muslims care a great deal about winning public recognition for their religion, having the state accommodate their religious practices, and being able to pass on their faith to their children in what they perceive to be a hostile social and political environment. That most accounts of Muslims in Western Europe have not systematically considered the politicization of these religious issues, therefore, marks a significant hole in the existing literature.

State structure theories have also failed to consider how the inherited institutional context of church and state in Western European nations has shaped the political resolution of Muslim religious demands. While some accounts briefly note the constitutional status of religion in particular states (Zolberg and Woon 1999), few authors expand on what role this institutional context assumes for Muslim politics, particularly for how religious issues are resolved. What we will argue, by contrast, is that the constitutional and legal status of religion in each nation, along with the historical context through which the institutions of church and state have been related, are very significant in shaping how Britain, France, and Germany have accommodated the religious needs of Muslim groups. That history and those institutional structures have been key components in explaining the disparate ways in which states have accommodated the religious needs of Muslims.

Political Ideology and Muslim Mobilization

A third theoretical perspective pays more attention to ideas than to institutions, actors, or political resources. Picking up on much of the interest in recent political science literature on the connection between ideas and policies, this view contends that a nation's political ideology, particularly ideas

about citizenship, nationality, and pluralism, shapes how the state resolves issues related to immigrant rights. Adrian Favell (1998) explains the divergent responses to ethnic and racial groups, particularly those of Muslim origin, in France and Britain in terms of each nation's public philosophy, or political theory. He argues that the guiding principle of political incorporation for immigrant groups in France is the republican tradition (Weil 1991) that favors a philosophy of integration rather than accommodation. The notion that France has a culturally particular idea of what it means to become a French citizen meant that French political elites and policy makers opposed separate Islamic institutions because this arrangement would violate the state's ideological commitment to integrating individual outsiders into the French political culture (Favell 1998:45). Instead of transforming immigrants into ideal citizens, the dominant ideas in Britain's political ideology place greater emphasis on managing relations among divergent populations, and allowing separate groups to retain their distinctive identities. Such an ideology has meant that British policy makers from both of the major parties have been open to recognizing Islamic immigrants through public policy. This commitment explains why the state has supported multicultural education, race relations legislation, separate Islamic schools, and the development of independent Muslim communities. Political compromise is also consistent with Britain's pragmatic political tradition, which gives greater preference to what works than to abstract theorizing.

In a similar vein, Erik Bleich (1998) describes what he calls an "ideological prior" (a preexisting set of philosophical commitments) that structures the debate among policy makers on immigrant rights within a particular country. Once these ideas about national identity are embedded within a political culture, they prove resistant to change. In a comparison of citizenship laws in Germany and France, Rogers Brubaker (1992) argues that public policy is conditioned by an entrenched "cultural idiom" that effectively determines the policy outcome. David Blatt (1995) takes the argument a step further and contends that these "institutionalized norms" also shape the collective action of immigrant groups trying to change public policy. The inherited national ideas about political membership are so powerful that they even impact outsider groups who are trying to gain access to the political system.

A number of critics have pointed out that ideological accounts alone cannot easily explain the fact that nations' citizenship laws have proven to be quite malleable in recent years. Christian Joppke notes that the literature often characterizes Germany as a country that rejects immigration, despite the fact that "a series of Constitutional Court rules obliterated the official not-a-country-of-immigration policy" (1998:284). He makes

a compelling case that guestworkers had won concessions from the state well before Schröder's reforms of 1999 made it easier for them to gain German citizenship. Joppke's evaluation does not, however, fundamentally reject the premise that ideas matter in the policy process. On the issue of family reunification policy, Joppke writes "it pitted a state that would rather not see it happen against the immigrant who only sought what liberal states cannot deny – family unity" (1998:281). European states have had a more welcoming family unification policy than their immigration rhetoric might envision, Joppke argues, because liberal values demanded it. In the German case, then, it was competing ideas, specifically international norms and self-imposed moral obligations, that undermined the state's inherited not-a-country-of-immigration ideology.

The point of this discussion is that even the detractors of ideological theories understand that ideas can drive the policy process as much as institutions or resources. Analysts who have adapted the theory have made a compelling case that existing laws on citizenship, for example, follow logically from national ideas about who can and cannot be a member of the political community. Those who have countered the theory have themselves turned to different sets of ideas to explain why public policy changes over time. Ideas, in short, have had an impact on how receiving states have accommodated Muslims in the past several decades.

As with political opportunity structure theory, our claim is not so much that ideological approaches are wrong, but that they fail systematically to consider how ideas about the role of religion in public life play a dominant role in how states have accommodated Muslim religious practices. Analysts adopting an ideological theory have given much attention to national ideas about citizenship, political incorporation, and liberal political values in their accounts, but none of them has considered how a shared public philosophy on what role religion should play in public life has helped to shape the debate around Muslim religious rights. What our theory will demonstrate is that public ideas about church and state in Britain, France, and Germany have been critical factors for determining the states' policy response to the religious needs of Muslims.

Religious Institutions, Church–State History and Muslim Mobilization

The focus of our theory will be on the policy legacy left by a country's history of church–state relations. We hypothesize that public policy on state accommodation of Muslim religious practices in Britain, France, and

Germany varies based in part on the inherited relationship between church and state in each nation. We will demonstrate that this policy tradition helped to determine the types of religious demands that Muslims have proposed, the response of various actors to those needs, and the public policy that the states eventually adopted in the area of Muslim religious rights. To the extent that policy responses in West European nations have differed, we will show that these differences resulted in large measure from dissimilar opportunities provided by the inherited church–state structures in particular nations.

The Selection of Case Studies

To test our theory, we will look at public policy on the religious needs of Muslims in Britain, France, and Germany. While we recognize that this is not an exhaustive list of Western European states, there are several reasons we believe these to be the appropriate nations to compare. First, the countries in our study share a number of institutional features. In absolute numbers, more Muslims live in these three countries than in any others in Western Europe. In two of the countries, Britain and France, migrants have come primarily from the former colonies of Pakistan and Algeria, while in Germany most have arrived from Turkey as a direct consequence of treaties signed by the two countries in the 1950s and 1960s to encourage immigration. In all three states, the impetus of this first wave of immigration was economic; workers came in response to the labor shortages that Western European countries experienced in the midst of their postwar economic boom. States considered this migration to be short-lived, however, and neither encouraged, expected, or wanted workers to become permanent residents. The fact that many of these workers did eventually stay has been, in Christian Joppke's apt phrase, "a disturbing novelty" for European states that were ill prepared to receive them (1999:9). As Muslim workers settled in Britain, France, and Germany, the issue of their incorporation became particularly pronounced. In fact, as we will show in the chapters ahead, issues surrounding Muslim integration have been central to the domestic political debate in each of these three nations over the past two decades.

Second, the countries in our study are all stable democracies whose commitment to religious freedom is generally recognized. The constitutions of France and Germany require the state to remain neutral among religions and to protect citizens' individual rights of religious expression. While Britain offers no constitutional protection for religious rights, its common law tradition supports the concepts of religious pluralism and