# Discursive opportunities for Muslim minorities in West secular Europe

Assessing the discursive opportunities regards the accommodation of Islamic religious practices and counteracting Islamophobia in France, the Netherlands, the United Kingdom and Germany

Matthijs Louwrens Leeuw Enschede, March 2018

Supervision by: 1<sup>st</sup> supervisor: Dr. Ringo Ossewaarde 2<sup>nd</sup> supervisor: Prof. Dr. Klaus Schubert



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University of Twente Faculty of Behavioural Management and Social Science Master of Science Student number: 1361104

Westfälische Wilhelms-Universität Münster Institut für Politikwissenschaft Master of Arts Martikelnummer: 436231

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#### Abstract

This search focuses on the concepts of discourse, institutional and discursive opportunity structure in relation to the accommodation of Islamic religious practices and counteracting Islamophobic discourses in France, the Netherlands, the United Kingdom and Germany. It argues that the interactive spectrum – ranging from the protection of Muslims' 'Muslimness' to the accommodation of Muslims' 'Muslimness' - differs crossnationally, still opportunities for Muslim minorities are similar across all four selected countries. That is to say, opportunities can be ordered as follows: protection institutionally, accommodation institutionally, accommodation discursively, and protection discursively. Analysing the main discursive elements provided by data of the EURISLAM project, the visibility aspect and states' neutrality indicate resonance discursively forasmuch Islamic religious practices. As to forms of Islamophobia, a paradox lies in the trade-off between generalising, the essentialist character of the concept as noun and the specificity of claims that 'phobia' requires. The absence of an explicit legal definition of Islamophobia that touches upon basic human rights is stretched discursively, while national secular traditions concerning the accommodation of Islamic religious practices and minority rights resonate differently in the discursive realm. This exploration pretends that the protection and accommodation of Muslims' 'Muslimness' will most likely take different routes. A postnational institutional direction forasmuch anti-Islamophobic discourse and national path dependency as accommodative driving force would provide an interesting intercommunion regards the 'Europeanisation of Islam' in the near future.

#### Keywords:

Institutional opportunity structure; discursive opportunity structure; Islam; claim-making; Islamic religious practices; Islamophobia

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AAIIA	Ahmadiyya Anjuman Isha'at Islam Amsterdam	69		
AfD	Alternative für Deutschalnd	25		
CCIF	Collectif Contre l'Islamophobie en France	24		
CEHR	Commission for Equality and Human Rights			
CFCM	Conseil Français du Culte Musulman	113		
CIA	Central Intelligence Agency	76		
CMBI	Commission on British Muslims and Islamophobia	22		
CORDIS	Community Research and Development Information Service	16		
DITIB	Diyanet İşleri Türk İslam Birliği	117		
DOS	Discursive Opportunity Structure	12		
ECRI	European Commission against Racism and Intolerance	24		
EIR	European Islamophobia Report	32		
ESS	European Social Survey	39		
EU	European Union	113		
EU MIDIS	European Union Minorities and Discrimination Survey	56		
EVS	European Values Study	49		
FES	Friedrich-Ebert Stiftung	40		
FRA	European Union Agency for Fundamental Rights	48		
GRI	Government Restrictions Index	53		
ICERD	International Convention on the Elimination of all forms of Racial Discrimination	25		
IOS	Institutional Opportunity Structure	30		
KRM	Koordinationsrat der Muslime	117		
MCB	Muslim Council of Britain	117		
MPI	Migration Policy Institute	54		
OECD	Organisation for Economic Co-operation and Development	53		
OIC	Organisation for Islamic Cooperation	3		
PCA	Political Claims Analysis	36		
PRC	Pew Research Center	7		
PVV	Partij Voor de Vrijheid	24		
SHI	Social Hostilities Index	53		
UOIF	L'Union des Organisations Islamiques de France	113		
UN	United Nations	51		
VIKIZ	Der Verband der Islamischen Kulturzentren	117		
WZB	Wissenschaftszentrum Berlin für Sozialforschung	20		

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#### 1. Introduction

#### a. Background

This section elaborates on the academic trends pertaining to the interactional dynamics between Muslim minorities and West European host societies. Those interactional dynamics and the perceptions both non-heterogeneous groups hold towards one another, received increased academic attention over the last few decades (Koomen & van Heelsum, 2013). This rather contested relation is analysed within different frameworks, say historical analyses (Greene, 2008), ethnographies along religious or cultural lines (Schiffauer, 2007), policy analyses in national and international contexts, and media content analyses have focused on the actualisation of conflict events. These interactional dynamics are primarily triggered by the growing numerical presence of Muslim minorities residing in West Europe (Berger, 2013; Hackett et al., 2015; Laurence, 2011), the oftentimes referred to incompatibilities between liberal democratic values and Muslim group demands (Statham, Koopmans, Giugni, & Passy, 2005), and with it hostile positions towards Muslim minorities. Although European states face similar challenges as to the accommodation of Islamic religious practices, states institutionalise and maintain different models in this regard. The above suggests that this field of study is not solely fragmented but also provide different angles and perspectives from which one can study the interactional dynamics between Muslim minorities and West European host societies.

Currently, the academic debate is dominated by scholars attempting to uncover the relation between the public media discourses and Islamophobia (see Ahmed & Matthes, 2016; Ogan, Willnat, Pennington, & Bashir, 2014), national majorities' perceptions on Muslim group demands as a consequence of socio-cultural divergence (see Croucher, 2013; Tillie, Koomen, van Heelsum, & Damstra, 2013; Vanparys, Jacobs, & Torrekens, 2013), the relation between the domestication of Islam and secular principles as a result of different politico-legal ideologies (see Burchardt & Michalowski, 2015; Mavelli, 2013; Sunier, 2014) and therefore the inter-state differences forasmuch church-state relations and the accommodation of religious practices (see Koenig, 2015; Maussen, 2015; Tatari, 2009). These subdomains – among others – function as small pieces to the larger and one of the most prominent puzzles in social science, namely how and to what extent Islam can be accommodated in Europe.

#### A succinct literature review

Previous research has shown that there exists a relation between states' assimilation models and states' majorities' perceptions of religious practices on the one hand (Carol & Koopmans, 2013), and that cross-national differences in church-state relations explain partially the adoption of Muslim group demands by West European host societies (Cesari, 2014; Loobuyck, Debeer, & Meier, 2013; Tillie et al., 2013). The increased political relevance and academic interest forasmuch the interactions between Muslim minorities and European host societies brought about various patterns; still the cross-national differences are insufficiently explained until the present day. More complexities in this field of study centre on the nature of pluralist society, that is, the interplay between conflicting norms, values and related worldviews on the one hand, and a sense of belonging on the other hand. In other words, the extent of restrictions on Muslim religious practices as means of identity preservation while seeking to integrate Muslims into European societies clash (Boening, 2007). The creation of a Muslim identity is therefore referred to as a form of 'cultural defence' (Coleman & Collins, 2017). However, as Muslims' organisational and political rights have expanded over the last years in Europe, anti-Islamic populism has risen too. It is exactly this - what Burchardt and Michalowski refer to as 'complex parallelism' (Burchardt & Michalowski, 2015) – normalisation and dramatisation respectively, that suggest a strife. This strife, however, is one that primarily but not solely is dealt with in the political arena. The 'multikulti' concept has utterly failed amid increasing anti-immigration feeling among the Germans; Chancellor Angela Merkel said back in 2010, pointing primarily to second and third generation immigrants (Evans, 2010). Earlier research, therefore, focussed primarily on whether Muslim organisations promote either integration or segregation, while neglecting to pay attention to the contextual factors that underlie particular stances and actions (Kortmann & Rosenow-Williams, 2013b).

Whether one conceptualises and studies Islam as a religion (Ramadan, 2013), cultural identity (Roy, 2006), political ideology or discursive tradition (Anjum, 2007; Schielke, 2010); institutional and political, and horizontal social contextualisation matters (Asad, 2009a). From here, it is not surprising that West secular European states embody platforms where conflicts arise at institutional level. The final integrated EURISLAM report (2013) states that formalities as legislation and jurisprudence on the one hand, and informal identity conceptions and public views on the other hand, define the 'cultural interactions between Muslim immigrants and receiving societies' (Tillie et al., 2013). These two dimensions emphasise another ambiguity, oftentimes referred to as the numerical imbalance between Muslim minorities and the non-Muslim majority in a liberal democratic setting, in which the state possesses a contradicting role. The European liberal democratic state "has duties to protect and uphold the rights and identities of the minority, particularly if they are citizens, while on the other, majoritarian politics is based on the idea that state sovereignty derives from popular will, which legitimates the notion that majority's opinion should be the basis for decision-making. This contradictory role of the state makes it a central actor and target in the contentious politics over Muslim group rights, because it has to make decisions while facing the mobilised demands of Muslims, on one side, and those by political actors from the majority society, on the other" (Statham, 2016, p. 223). S. Mahmood goes even further to say that European native majorities and Muslim minorities are unable or even unwilling to understand the other's motivations and lines of reasoning. Moreover, she contends that the role of the state is ambiguous an sich, as the "practice of law regarding moral offence is by nature majoritarian and unlikely to take seriously the concerns of a religious minority, the more so as their concerns are not correctly translated due to a misconception about the nature of speech and representation, a misconception that, according to Mahmood, is essentially due to a normative understanding of religion internal to liberalism" (Mahmood, 2009, p. 74 as cited in Schielke, 2010, p. 7). The difficulty in institutionalising, say the assignment of political status to religious interest groups is twofold. Religious groups gain privileges and advantages while accepting several constraints, restrictions and obligations. When it comes to Muslim communities, they are obliged to "predicate on the prioritisation of national laws over religious texts and aspire to steep religious leaders in the secular precepts of a society in which church and state are separate" (Laurence, 2011, p. 131).

Another angle of the academic literature on the accommodation of Islam in European societies is not the mere interactions between the three above mentioned actors, but rather the ideological foundations that precede the politicisation – and even securitisation – of Islam and therefore the construction of the secular subject. The 'glocalizing' effect, say an increasing heterogeneous sense of insecurity brings more and more importance to communal, ethnic, cultural, linguistic, and religious demarcations (Cesari, 2014, p. 748). This also brings about different notions of 'securitisation' and perspectives from which this phenomenon can be analysed (Mavelli, 2013), that is, politicisation of Islam as strategy of identity preservation (Göle, 2006) or a matter of public order.

Overall, one could state that the 'accommodation of Islam in West secular Europe' research puzzle obtained more and more pieces over the last few decades. However, how those pieces fit together is not always clear-cut and instigates fierce debates. As to now, the debate is primarily centred on how states deal with Muslim group demands, thus signifying a rather European state's perspective. Consequently, the triad of actor-relationships between the state and non-Muslim majority, the state and Muslim minorities, and non-Muslim majority and Muslim minorities is not evenly covered in academic circles. For some, the relation between majority and minority groups an sich is what should be focused on (Lathion, 2015). This calls for another point of departure, one that moves away from the European institutional perspective as church-state structures are not the sole determinants of states' accommodation of Islamic religious practices (Tatari, 2009). The emergence of mass media played "an important role in the creation and distribution of ideologies and thereby contribute to the overall cultural production of knowledge" (Ahmed & Matthes, 2016, p. 3) and with it, media provides opportunities for mobilisation of social movements. It is exactly the opening of this window that informs social movements as many activists are by no means fully informed political analysts who are up-to-date forasmuch their interests all the time and have profound knowledge of the institutional intricacies of the political system per se (Koopmans & Olzak, 2004). For the diffusion of ideas to occur, communication channels are essential and the mass media has gained widespread importance in informing not only the publics, but also social movements. Discursive structures

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highlight the probability that a certain message diffuses in the public sphere, that is, the visibility of the message. However, this probability is endangered by a high level of competition that in turn changes over time, e.g., 'the impact of dramatic events on public debate concerning accommodation of Islam in Europe' (Vanparys et al., 2013). This rather informal way of informing and getting informed by social movements – outside the political realm – functions as a new dimension next to institutional arrangements. Although, discursive opportunity structure cannot be fully seen independently from institutional opportunity structure, as "the public sphere mediates between political opportunity structures and movement action" (Koopmans & Olzak, 2004, p. 201), which in turn are subjected to framing practices. The relation between the state - in the accommodation of Islam - and Muslim minorities - in adopting host countries' institutions - is not entirely isolated from the discursive opportunity structure. M. Maussen (2015) therefore states that "differences between French, Dutch or British ways of accommodating Muslim demands can be explained in light of interactions between, on the one hand, processes of Muslim mobilisation and advocacy, and, on the other hand, host countryspecific institutional, discursive and political opportunity structures" (Maussen, 2015, p. 81). While formal institutional opportunity structure gained a lot of attention as it explains the possibilities within political systems that trigger incentives for collective action, discursive opportunity structure - as a relatively new concept – is still a somewhat vague notion, also in empirical terms. Since debates about the accommodation of Islam in Europe got mediatised, new opportunities emerged for collective action. In order to get their demands heard, movement actors must understand, "incorporate and respond to critical discursive elements in the broader cultural environment" (McCammon, Muse, Newman, & Terrell, 2007, p. 726), as context matters. Social movement actors must thus frame their demands in such a way that fits within a hegemonic discourse to increase their chances to be politically effective. It is important to understand which demands and issues are communicated through this new window of opportunity and why so.

# Recapitulating the 'knowledge-gap'

Academic literature on these issues is primarily focused on accommodation and therefore function national institutional arrangements oftentimes as points of departure. Much is covered in academic circles when it comes to national legislatures' decisions concerning allowing or obstructing Muslim group demands over time and in different national contexts. The debates on how Islam could be accommodated are primarily skewed to state perspective. However, less is known about which and to what extent structures and communication channels are foundational for the interaction between Muslim minorities and national governments and more so non-Muslim majorities, and ultimately how they are used. Moreover, opportunities are unevenly seen and used which raises questions about the legitimacy of the public debate, among others because opportunities are discursively challenged. Also the tendency of studying the accommodation of Islam in a top-down fashion triggers some sort of dehumanisation as Muslims are perceived as governmental policy categories (Sunier, 2012). The rise of nationalist rhetoric and the re-essentialisation of identity (Cesari, 2009) hardened national discourses on immigration and thus – hypothetically – puts Muslim minorities at a disadvantage when it comes to prevailing discourses, cultural themes and frames that undergird the public debate.

Because "there has been virtually no research on how the institutional accommodation of Islam, mediated through political controversies, relates to the views of ordinary people living in that country" (Statham, 2016, p. 218), it is essential to identify this gap. It is here, where I see that the visibility, resonance and legitimacy of prevailing discourses and frames play an essential role, ultimately bringing about a panoramic view of a discourse. The challenge is to define the prevailing master discourse, and to objectively explore the discursive opportunities for all three actor categories. Moreover, discursive opportunity structure is by no means as formal as institutional opportunity structure. This means that "on the one hand, Muslims become rooted in their local environments, yet at the same time modern mass media and modern means of communication enable Muslims to build networks and communities across national borders" (Sunier, 2014, p. 1149), and thus influence ideas<sup>1</sup>. Discursive opportunity structure – as concept introduced by Koopmans and Olzak (Koopmans & Olzak, 2004) – is not yet fully developed as to the actual mobilisation effect, that is, the threshold for

<sup>&</sup>lt;sup>1</sup> E.g., the call for anti-Islamophobia laws by the Organisation of Islamic Cooperation (OIC) (Nebehay, 2012).

collective action based on emotionalisation, rationalisation or both. It is to the utmost extent essential to understand discursive opportunity structures, as they can serve to link political opportunity structures and framing practices on collective action (Bröer & Duyvendak, 2009), precisely because prevailing discourses, cultural themes, sentiments and frames inform the political arena. Besides, discursive opportunity structures might help to understand the strategies of resource mobilisation by social movements, which is – through media coverage – rather controversial pertaining to Muslim minorities. This search focuses on two discursive aspects, namely the protection and accommodation of Muslims' 'Muslimness'. The interactional dynamics between non-Muslim majorities and Muslim minorities for others (Lacey, 2014).

# b. Research question formulation

The above section contextualises and emphasises the need for gathering a more profound understanding of what the discursive opportunity structure is, and the perception thereof by the state, the non-Muslim majority and particularly Muslim minorities. Moreover, it is important to understand how they are used, that is, how they influence extra-parliamentary social movements, their utilisation and eventually the political arena. The overall research question that guides this thesis is:

# What are discursive structures and how do they function in the context of Islamic religious practices and anti-Islamophobia discourse for Muslim minorities residing in West secular Europe?

The objective is to find out in which extent discursive structures provide opportunities for Muslim minorities for their group demands forasmuch Islamic religious practices on the one hand, and counteracting Islamophobia on the other. This research question encompasses several aspects that require some clarification. The concept of discursive opportunity structure, as thread of this inquiry, will be profoundly discussed in the theoretical section. It suffices here to say that discursive opportunity structure can serve to link institutional opportunity structure and framing perspectives on collective action and thus connects macro-structural contexts with meso- and micro-levels. Discursive opportunity structures are those aspects of the public discourse that determine sentiments' and messages' chances of diffusion in the public sphere; it triggers social movement action, which in turn informs the political arena.

Muslim group demands are highly controversial. First, such demands might go beyond that what is already legally granted to other faiths and what is institutionalised as common civil and political rights of individual citizenship within West European liberal democracies. Second, if states heed such demands, then the state recognises the distinctiveness of identity as the state accommodates the needs of this group with a distinctive identity. The controversy of group demands comes to the fore when it involves exceptional rights because this threatens the very concept of a unified, undifferentiated citizenship and thus solidarity and cohesion (Statham et al., 2005). On the other hand, "institutional barriers, such as citizenship or legal restrictions, seem to constitute the key barriers to their social and labour market integration" (Constant, Kahanec, & Zimmermann, 2011, n.p.), endangers integration. 'Exceptional group demands' involve rights that are not yet granted to other native cultural or religious minority groups. In other words, exceptional rights embody a new accommodation category. 'Parity group demands' are requests that seek for equality or equity, since such demands involve privileges and exemptions from duties that already are granted to other native cultural or religious minority groups.

Islamophobia is a term first used in the *Runnymede Trust Report 'Islamophobia A Challenge For Us All'* and referred to it as the "unfounded hostility towards Islam. It refers also to the practical consequences of such hostility and unfair discrimination against Muslim individuals and communities, and to the exclusion of Muslims from mainstream political and social affairs" (RunnymedeTrustReport, 1997, p. 4). Ever since, the term became popular and with it many different connotations emerged. As to now, there is no legal definition of Islamophobia, besides an agreed upon definition in social science is lacking. It is therefore not surprising that J. Cesari's definition of Islamophobia is rather broad as she contends that it is "a modern and secular anti-Islamic discourse and practice appearing in the public sphere with the integration of Muslim immigrant communities and intensifying after 9/11" (Cesari, 2006a; 2014, p. 745). The European Islamophobia Reports<sup>2</sup> document on Islamophobic trends across Europe, which differ across countries as to forms, targets and responses. Anti-Islamophobia discourses can be considered as a starting point of a horizontal spectrum, as 'unfounded hostility', 'unfair discrimination' and 'the exclusion of Muslims from mainstream political and social affairs' embody a reasonable threat to European civilisation too. Islamophobia is widely perceived as a threat or challenge for Muslim minorities but also as failure and imperfection of European host societies. Islamophobia is thus a phenomenon that deserves public attention from all three actor categories. It is the starting point of the spectrum because one could expect and assume that the state, non-Muslim majorities and Muslim minorities - in a liberal environment – all have a negative stance towards Islamophobia or prejudice per se. 'Exceptional group demands', on the other hand, highlight the end of the spectrum. 'Exceptional group demands' are not typical in European secular host societies and therefore more likely to receive resistance from the non-Muslim majority in public discourses. However, since states maintain different church-state regimes, this 'exceptionality' varies. Moreover, as dynamics in public attitudes towards Islamic religious practices differ across states, 'exceptionality' becomes a contextual concept. In between counteracting Islamophobia and 'exceptional group demands', a range of other group demands for the accommodation of Islamic religious practices can be found. The specificity of a group demand depends primarily on the institutionalised recognition of religion vis-à-vis the public sphere, that is, church-state structure (Tatari, 2009), and the extent in which cultural traits are formally allowed. These formalities differ among states under scrutiny.

# Onset considerations and sub-questions

To answer the overall research question in a systemic way, several sub-questions function as pillars. In order to put this search in perspective, it is to the utmost extent important to contextualise the current state of affairs. This means that understanding the relation between the three actor categories – the state, non-Muslim majorities and Muslim minorities – must be clarified. This can be done along various lines, say political-legal or cultural-religious values (Berger, 2013). In a somewhat similar fashion, I choose for institutional and discursive opportunity structures as focus. I do so, because opportunity structure encompasses a non-subjectivity quality, which is needed to analyse this topic from an objective panoramic perspective. Moreover, opportunity structure embodies one possible link between anthropologists and political scientists that oftentimes maintain different points of departure when it comes to "the recasting of Islam as an ethnicised political identity through attempts to foster a collective existence within the categories of European states" (Soysal, 1997, p. 509). The first sub-question functions as foundation as it combines conceptual and descriptive components.

# 1. What are discursive opportunity structures and which can be observed for Muslim minorities in West secular Europe?

The second sub-question builds on the first one, and aims to uncover the discursive opportunities for Muslim minorities. It is important to explain the relation between specific opportunities and actors' decision to mobilise resources for claim-making. Moreover, Muslim group demands' nature on the one hand, and prioritisation on the other, provides a better insight as to the incompatibilities between West European democratic, liberal and secular principles, and Islamic religious practices. Again, cross-national differences will be observed.

# 2. How can we define Muslim minorities' discursive playing field with regard to group demands for Islamic religious practices and counteracting Islamophobia in West secular Europe?

As 'exceptional group demands' signify the right-end of the horizontal spectrum, counteracting Islamophobia is considered as the beginning of that spectrum. Islamophobia is treated here as incompatible with Islamic religious practices and West European democratic and liberal principles, as the state of a civilisation is based on its ability to incorporate 'the other'. Or as Rosanvallon (2000)

<sup>&</sup>lt;sup>2</sup> http://www.islamophobiaeurope.com/

puts it, "the 'good society' is the society that allows the peaceful coexistence of differences, not the society that guarantees inclusion" (Rosanvallon, 2000, p. 36). This 'good society' is, however, challenged by what Appadurai calls the '*globalized civilization of clashes*'. He contends that a double logic of, both the globalising internal moral opponents and localising faraway moral enemies, triggers ideocide and civicide (Appadurai, 2006).

The overall research question, in accordance with the two sub-questions, aims to clarify the relations between the state and non-Muslim majority, the state and Muslim minorities, and non-Muslim majority and Muslim minorities by using opportunity structure as hold. It is important to contextualise and define 'the playing field' of Muslim minority groups by means of interrelated institutional and discursive opportunity structures and to what extent those structures enable or constrain their strategies when it comes to their claim-making priorities. Profound answers to these questions contribute to our understanding on how Muslims' 'Muslimness' is protected and accommodated discursively in France, the Netherlands, the United Kingdom and Germany. Arguably the public debates pertaining Muslim minorities have intensified after 9/11, and so it becomes fruitful to see how such debates function in the spheres of protection and accommodation. In other words, different discursive playing fields provide different opportunities and so Muslims' 'Muslimness' differ not only institutional and discursive opportunities, is fecund regards the momentous puzzle as to the '*Europeanisation of Islam*'.

#### c. Approach

The contribution of this search is twofold. First, it tries to explain the essence of discursive opportunity structure – next to institutional opportunity structure – for Muslim minorities residing in West secular Europe. Second, by means of focusing on group demands and combatting Islamophobia, two non-mutual exclusive but extremes forasmuch non-Muslim majorities' positions towards them, enable us to gather a more profound understanding of the rationalisation and emotionalisation of Muslim minorities on both matters, their prioritisation and possibilities for resource mobilisation and collective action (Maussen, 2005).

This search can be labelled as exploratory with explanatory elements, as its main aim is to set out when and why discursive opportunity structure provides incentives for Muslim minorities to raise their voices. Irrespective of the fact that a clear and specific research question and conceptual framework guides this research project, it also embodies an unfolding structure as there is no precoded data available that explains every single step that needs to be taken. This unfolding quality results from an emerging research area and a rather contested theoretical framework. It is exactly therefore that the working definition of 'discursive opportunity structure' must be defined maximally, that is, I "aim for the inclusion of all non-idiosyncratic attributes, thereby defining [the] concept in its purest, most ideal form" (Gerring, 2011, p. 136). This is motivated by the stance that formal institutional opportunity structure has been subjected to academic scrutiny more and therefore must be disentangled from discursive forms. This search can be considered as a media discourse analysis with a critical approach. This study sets out the discursive elements that reveal minimally what can be thought of, said and written in a particular space and time and thus reveals hegemonic ideas "and often invoke a call to social responsibility" (Bednarek, 2006, p. 11) or policy direction.

France, the Netherlands, the United Kingdom and Germany have been selected as cases. Those countries institutionalised different church-state structures, assimilation models and thus have shown different patterns with regard to the accommodation of Islamic religious practices (Tillie et al., 2013). Institutional opportunity structure is not central to my argument but certainly influences discursive opportunities, and thus must be considered as contextual foundation. Moreover, these four countries have been analysed as part of the EURISLAM project for the very reason that those countries encompass relatively large Muslim populations that enjoy – or are constrained by – different degrees of religious accommodation. EURISLAM's media content analysis provides quantitative data which enables for comparative purposes. The EURISLAM project was funded by the European Commission, emphasising the importance of a thorough examination of national traditions, identity conceptions, citizenship and church-state relations in relation to the incorporation of Muslims into

West Europe. The project started on the first of February 2009 and was finalised on the first of August 2012.

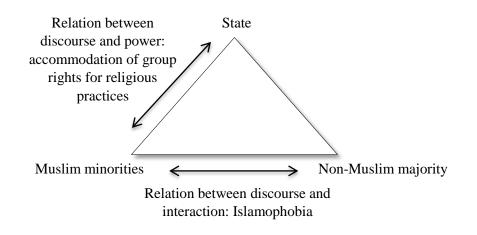
When it comes to the group demands, a selection is made based on the controversy around religious and cultural rights inside and outside public institutions. Those religious and cultural rights – either granted to Muslim, refused or probably in consultation at some level – are composed as aggregation of diffused controversies across France, the Netherlands, the United Kingdom and Germany (Carol & Koopmans, 2013). However, public contestation on, for instance, headscarves within public institutions differ significantly between France and the United Kingdom (Tillie et al., 2013) and between the Netherlands and Germany (Saharso, 2007). With regard to Islamophobia, the European Islamophobia Reports from 2015 and 2016 are leading. Those reports elaborate on hostilities with an Islamophobic character in twenty-five and twenty-seven countries, respectively during 2015 and 2016. Also the European Union Minorities and Discrimination Survey on Muslims provide essential data. Moreover, Pew Research Center's (PRC) Government Restrictions Index measures "government laws, policies and actions that restrict religious beliefs or practices [...] including efforts by governments to ban particular faiths, prohibit conversions, limit preaching or give preferential treatment to one or more religious groups", while its Social Hostilities Index measures "acts of religious hostility by private individuals, organisations and social groups [as] mob or sectarian violence, harassment over attire for religious reasons and other religion-related intimidation or abuse" (PRC, 2011)<sup>3</sup>. It can be said, although with caution, that governments' restrictions and social hostilities are associated<sup>4</sup>. Hate crimes can be considered as an expression of political opinion too (Carol & Koopmans, 2013).

The main topic of this search is the regulation and organisation of a relatively new religion into public spheres, but also the reactions to it. It analyses the power relations that precede institutions in France, the Netherlands, the United Kingdom and Germany. In other words, ideology as churchstate relations and discourse are central and "can be investigated as actual social relations ongoingly organised in and by the activities of actual people" (Mandell, 2002, p. 76). This is at the core of institutional ethnography, as institutional orders are studied from participating individuals' points of view, so that a better understanding of "how people in one place are aligning their activities with relevances produced elsewhere" (Smith, 2009, p. 32). Eventually, ethnographies aim "to document actual patterns of social behaviour, rather than just artefacts and beliefs, and to explain these in terms of the needs that any individual or society must meet. [This emphasises the] differences in orientation not only between societies but also within them, and to greater concern with documenting the cultural interpretations that inform patterns of action" (Hammersley, 2005, p. 5). The institutions and discourse - say macro-level - and the perceptions hereof by Muslim minorities and non-Muslim majorities - say micro-level - is linked by Muslim organisations on the meso-level. In order to see how powerrelations vis-à-vis Muslim minorities are effectuated, the EURISLAM project provides a set of religious practices which are contested, both for formal accommodation and public sentiments. Subsequently, the mobilisation of individuals - particularly Muslims through Muslim organisations provides insights concerning their cultural interpretation of institutional orders and cultural interpretations of other groups, particularly non-Muslims. These interpretations and patterns of action hypothetically differ across the countries under scrutiny. This interpretative quality demands an investigation of context through two discourse analyses (see Figure 1). Because 'wide' discourses as social practice are interpretable, they are "socially constitutive as well as socially conditioned - it constitutes situations, objects of knowledge, and the social identities of and relationships between people and groups of people" (Wodak, 1997, p. 173). Figure 1 simply suggests that we deal with multiple discourses and that the discursive image encapsulated in particular actor categories becomes less fixed in the discursive playing field, that is, static institutions do not presuppose discursive interventions.

<sup>&</sup>lt;sup>3</sup> http://assets.pewresearch.org/wp-content/uploads/sites/11/2017/05/03104149/Appendix-E.pdf

<sup>&</sup>lt;sup>4</sup> http://www.pewforum.org/interactives/restrictions-on-religion-among-the-25-most-populous-countries-2007-2015/

# Figure 1: Two discourses of interest<sup>5</sup>



<sup>&</sup>lt;sup>5</sup> The interaction between state and Muslim minority is a two-way street, that is, both bottom-up initiatives and top-down acknowledgements express institutionalisation of Islam in Europe (Rath, 2001). When institutionalisation happens irrespective of public recognition by the non-Muslim majority, tension arise (Tatari, 2009).

#### 2. Theoretical framework

This chapter aims to find an answer to the conceptual part of the first sub-question, namely what are discursive opportunity structures? The conceptual and theoretical foundation can be found here, that is, the coherence between lines of reasoning and working definitions that have explanatory value that guides this search. The focus lies on the triad relationship between the state, non-Muslim majority and Muslim minorities, with a special focus on the concepts of discursive opportunity structure, group demands and claim-making, and Islamophobia. In other words, the accommodation of Islamic religious practices is oftentimes studied through the lenses of formal institutional structures, say church-state relations and citizenship regimes (see Joppke, 2007), while less attention is paid to Muslim groups mobilisation, their interests promulgations and to what extent discursive opportunities provide them a reasonable space for manoeuvre to do so. The challenge is to disentangle discursive opportunity structure from institutional ones, as the latter is oftentimes considered as a 'carrier' of the former; still the degree of formality provides different macro-structural opportunities for mobilisation. Another challenge lies in the representative function of Muslim organisations, since the gap between the macro-structural level and micro-individual level embodied by the host society population and Muslim minorities is not fully bridged yet (Cinalli & Giugni, 2011). It is exactly the interactions between different levels – say the macro-, meso- and micro-level (Tillie et al., 2013) – that epitomise communication channels and opportunities.

Political opportunity structure theory received more and more academic attention throughout the last decades (Strijbis, 2015). The stance that structures of the political arena set the parameters for, among others, political participation and mobilisation is widely accepted (Cinalli & Giugni, 2011). However, as Bröer and Duyvendak (2009) argue, political opportunity structure theory does not explain why certain occurrences are perceived and experienced as opportunities by social movements. This gap must be filled by discursive opportunity structure, more specifically by framing rules and feeling rules (Bröer & Duyvendak, 2009). The theory of discursive opportunity structure is arguably not a fully-fledged theory yet and is challenged from various sides, and so are the bare institutional opportunity structures: the essence of awareness and perceptions of opportunistic structural variables embody the main limitations.

This chapter is organised as follows. First, after a short introduction to opportunity structures, the concept and theoretical dimensions of discursive opportunity structure are elaborated, as a bridge between the formal playing fields and framing practices (Helbling, 2014). It is important to understand both sides of opportunity structures, that is, the formalities on the one hand and the informal perceptions of the public discourse on the other hand. It is therefore that institutional opportunity structure – as one dimension of the umbrella theory, say political opportunity structure, an analysis of the formal institutions related to citizenship, cultural difference and church-state relations provide an overview of the different formal playing fields for Muslim minorities in the four selected countries (see Appendix 1 on p. 106). However, discursive opportunity structure must be considered as the thread of this search. Then, the two, what I call extremes, ends of the spectrum – say counteracting Islamophobia and advocating exceptional group demands – are set out. Overall, different institutional structures and dominant public discourses create different playing fields, and thus interactions between the three actor categories in the four selected countries differ.

#### **Opportunity structure**

The umbrella theory called 'political opportunity structure' received widespread attention from scholars skilled in the fields of social movements and collective action (McAdam, McCarthy, & Zald, 1996). Its thread is that opportunities and constraints in the political-institutional field determine whether there is a capacity, to mobilise and if so, the possibility for collective action. The cognitive recognition of collective strength and perceived availability of opportunities incite social movements (Tilly, Tarrow, & McAdam, 2001). Several qualitative indicators are believed to point to those opportunities and constraints, such as "elite division, electoral competition, electoral instability, the composition of government, and the state's capacity for repression" (Koopmans & Olzak, 2004, p. 201). One attribute of representative democracies is that societal cleavages incite political ones, which

turn into alliance structures. Moreover, those alliance structures could be formed as well by political authorities as in extra-parliamentary domains. Even though the extra-parliamentary domain and the political arena inform one another, it is exactly the exclusiveness of information and the essence of media coverage that vivify non-political actors (Koomen & van Heelsum, 2013).

S. Ahmed and J. Matthes (2016) observed numerous published studies on the role of the media in the construction of a Muslim or Islamic identity (Ahmed & Matthes, 2016). Media an sich is a contested phenomenon, however, the general tendency that mass media play an important role in the overall cultural production of knowledge is widely accepted. Their study exposed a certain representation of Islam that - by means of different theoretical frameworks ranging from Orientalism to integrated threat theory - articulates dominant social values, ideologies and developments. Their study showed that rather negative classifications, portrayals and discourses dominate media coverage when it comes to the construction of a Muslim or Islamic identity. Those two observations, say the exclusivity of information and increasing importance of media channels on the one hand, and the negative image of Muslims on the other, suggest that besides the formal political institutions more societal variables - and thus cleavage structures - have explanatory value in political participation and collective action. This leaves us, broadly speaking with the two dimensions of formal political institutions and informal societal factors. Until now, this eclecticism as to opportunities makes no clear distinction between political institutions and social structures, which however, comes at the cost of parsimony for general political opportunity structure theory (Strijbis, 2015). Moreover, studies on political opportunity structure and organisation formation provide various marginalia. First of all, the term political opportunity structure can be conceptualised in a very broad or narrow sense, respectively including or excluding certain dimensions. The concept becomes void when political scientists and sociologists create a 'sponge concept' that encompasses all aspects of the social movement environment (Gamson & Mever, 1996). Second, opportunity structure is oftentimes the point of departure, which means that it functions as the independent variable while the dependent variable concerned is often subjected to framing. This means that variations in protests, organisation formations and eventually policy outcomes cannot simply be disentangled from the dependent variable, that is, the objective. Third and this is where discursive opportunity structure comes into play, the bridge between opportunities and actions is based on assumptions. In other words, there is no clarity "about the mechanisms through which opportunities translate into action" (Meyer & Minkoff, 2004, p. 1483). Meyer & Minkoff start with "the basic premise [...] that exogenous factors enhance or inhibit prospects for mobilization, for particular sorts of claims to be advanced rather than others, for particular strategies of influence to be exercised, and for movements to affect mainstream institutional politics and policy" (Ibid., pp. 1457-1458). This starting point signifies the complexity of opportunity structures. First of all, the general openness of a specific polity does not necessarily accord perfectly with issue-specific opportunities in representative democracies. Second, and that is the core theme of this search, we need to differentiate between formal structural aspects of the polity forasmuch political openness and perceptual aspects of opportunity.

The first complexity will be tackled and clarified by a literature review on the institutional side of opportunity structures, which I refer to as institutional opportunity structure (Cinalli & Giugni, 2011), which can be found in the Appendix<sup>6</sup> (see Appendix I on p. 106). As pointed out earlier, the institutional dimension functions as carrier of the perceptual discursive opportunities, as not solely the institutional opportunities that incite mobilisation and collective action, as also public discourses suggest room for manoeuvre and thus opportunities. The second complexity is currently seen as a residual grey area, among others due to the different structures within issue-specific policy domains, perceptual differences and majority-minority proportions. It is important to conceptualise and demarcate Muslim group demands and claim-making in such a way that Western European institutions at least provide some room for manoeuvre. Based on different institutions and accommodation of Muslim religious practices and public discourses, we can hypothesise the discursive opportunities for Muslim minorities in a minimal way. In other words, by means of rationalising the formal institutions

<sup>&</sup>lt;sup>6</sup> The institutionalisation and accommodation of Islamic religious practices will be discussed for the four selected countries: France, the Netherlands, the United Kingdom and Germany. Here, the comprehensive analysis of J. Laurence on the state's role in minority integration is leading, with a special focus on the creation, functioning and role of Islamic Councils as communication channels in West Europe (Haddad & Golson, 2007; Laurence, 2011). Moreover, different church-state regimes are discussed.

and emotionalising the informal public discourse, we can define the playing fields for Muslim representatives. The same applies to anti-Islamophobic discourses.

a. Discursive opportunity structure or broad political opportunity structure

Discursive opportunities must be considered as main theme; hence it can be "argued that instead of lumping together all kinds of cultural and political elements in one [political opportunity structure] concept, it makes more sense to distinguish a political and a discursive (or cultural) opportunity structure. Although of course it will not always be possible to separate cultural and political variables" (Hooghe, 2005, p. 978). In other words, it would be useful to explicate where socio-cultural and political-legal discourses overlap, and where not. Having set out the narrow political or institutional opportunity structure, particularly individual access to nationality and cultural group rights, we now turn to the discursive or broad political opportunity structures. 'Broad political opportunity structures' because the institutional realm is widely believed to be the carrier of public discourse. In general, opportunities provide incentives for speaking out or not and trigger political mobilisation of migrants (Cinalli & Giugni, 2013; Oliveira & Carvalhais, 2017). The formal institutional regimes also impact Muslims' collective identity perception and the framing of their claims, that is, social movements might present themselves as 'foreigners', 'migrants' or 'Muslims'. From here one could expect that open citizenship regimes and tolerant cultural accommodation incites more rigid demarcations between minority sub-groups. In other words, when minority groups conceive an opportunity window it might as well present itself in the way closest to the heart (Strijbis, 2015).

The ambiguity of many governmental proceedings these days centre on the compromise between both force and choice. Whereas clear formal delimitations signify force, choice is a somewhat more complex side of 'governing through freedom' (Rose, 1996). When uncertainty persists about the actual demands of power and thus the absence of force, individuals or groups are more likely to think and act on their own. From here, the relative absence of power – because power is everywhere, diffused and incorporated in discourse, 'regimes of truth' and knowledge (Foucault, 1991) – provides individuals and groups room for manoeuvre. It is the perception of this room for manoeuvre and eventually the actualisation of action that feeds discourse. Choice, as "act of choosing between two or more possibilities, the right or ability to choose, or a range of [strategic] possibilities from which one or more may be chosen" (OxfordDictionary, 2017a) determines whether or not, and if so, how social movements strategically frame their identity and claims.

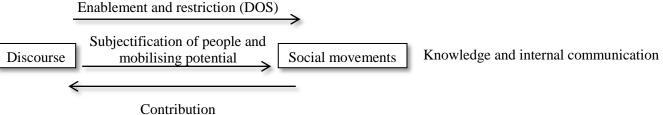
This section discusses the discursive side of opportunity structure. Throughout the last few decades, various European liberal nation-states - though with different national identities and institutional traditions - have significantly extended Muslim group rights (Joppke, 2007; Laurence, 2011). This accommodation can be largely explained by church-state regimes and the liberal norms that undergird European constitutional institutions. However, the extension of Muslim group rights has been, and still is, a matter that incited public opposition. Furthermore, there exists cross-national difference with regard to public contestation concerning certain religious practices (Statham, 2016). In order to disentangle the formal from the informal, we need to position liberal norms. This because "public sentiments should not be confused with public institutions, which due to the prevalence of liberal norms cannot operate unchallenged on an ethnocentric basis, so that: 'religion, particularly Islam, may still be more "barrier" than "bridge" to including immigrants in Europe but only as a matter of mentalities, not of institutions' (Joppke, 2013, p. 142)" (as cited in Statham, 2016, p. 218). So, liberal norms have distinct pragmatic meanings forasmuch public sentiments and public institutions. Here, is where I see the essential difference between institutional and discursive opportunities. Whereas liberal norms could be institutionalised, and if so take on a rigid character, liberal norms encompass a more chameleon-like character in public sentiments. This means that the broad understanding of liberal norms rather than the rigid laid-down institutions enable social movements to broaden their room for manoeuvre and thus framing practices. This complexity is highlighted by the debate concerning the transition and the limits of freedom of expression and hate speech (see Maussen & Grillo, 2014). In "European countries, it is against the law to assert in public that a racial, ethnic or religious group is to be feared or hated" (Bleich, 2014, p. 297). In other words, whereas liberal norms define institutional opportunities and thus the context; the context defines the essence of liberal norms as a matter of framing practices by social movements in the discursive realm.

Discursive opportunity structure starts with the premise that institutional opportunity structure and political power relations influence social movements' actions based on perceptions. Moreover, discursive opportunity structure also functions as a link between the institutional side and framing practices by social movements (Sandberg, 2006; Tillie et al., 2013) (see Figure 1.1 on p. 107). Social movements are not solely informed by power relations as they also "have a keen interest in following the reactions in the media to their own actions and see media coverage and political response as a measure of success" (Koopmans & Olzak, 2004, p. 202) with regard to their particular interests. The hindrance of access to information within the formal political spheres on the one hand, and the openness of the public debate due to media coverage on the other hand bring about different opportunity perceptions for different social movements. The growing importance of discursive opportunities is primarily based on two interrelated aspects. First, the barrier between the state and public with regard to information provision and transparency is a consequence of power relations, that is, the power-knowledge complex. This means that social movements are required to exert other sources for information. Second, those 'other sources of information' have a rather non-hierarchical character, which means that simplistic rational actor concepts as to success calculations do not fully explain social movement action, as eventually Muslim organisations need to address their concerns to the state (McCammon et al., 2007). From here, it is important to clarify the very concept of discourse, discursive opportunity structure and the playing field in which Muslim minorities find themselves regards the protection and accommodation of their 'Muslimness'.

# The concept of 'discourse'

"Discourses define the boundaries for what can be thought of and communicated at a given point of time in a given society" (Baumgarten & Ullrich, 2016, p. 2) and thus also apply for social movement actors. Discourses are not fixed frames and change over time, as actors might think and communicate the 'unthinkable' which then becomes thinkable and thus shift the boundaries. Making the 'unthinkable' thinkable is, however, the result of the perceived dominant discourse and internal communicative practices and knowledge generation within a social movement. Because, "framing theory emphasises the internal perspective of movements' own meaning-making strategies, [it has] difficulty in explaining why some such strategies meet with favourable responses while others do not" (Koopmans & Olzak, 2004, p. 199). Dominant or hegemonic discourses form subjectivity, that is, individuals gather perspectives, beliefs and feelings that regulate the government of the self and thus impact social movements' mobilisation potential. This latter point stems from Foucault's idea of power, as subjects of power are enabled and restricted by its implicit force (Foucault, 1979). According to Foucault, power is recreated and provides its own space by means of knowledge, while this recreated power in turn fetches knowledge. Foucault recognised that strategic alignments constitute both, elements of power and knowledge. Power and knowledge "were put forward to make sense of how the observation, documentation, and classification of individuals and populations contributed to newly emerging strategies of domination, which themselves were part of the complex social field within which those techniques and their applications came to constitute knowledge" (Rouse, 1994, p. 14). Following his knowledge-power complex, power is everywhere and passes through society and determines what society considers being 'normal' and 'imaginable' and thus defines the boundaries by which social movements are bound. It is exactly the regulation of knowledge production and subjectification that underscore the link between macro-, meso-, and microlevels, "or between structure and subjectivity" (Baumgarten & Ullrich, 2016, p. 1). Discourse as source of information and knowledge for social movements diffuses and provides discursive opportunities or discursive restrictions (see Figure 2).

Figure 2: The interplay between discourse and social movements



Discourse can be perceived as enabling or restricting based on social movements' internal communication, values, practices and knowledge generation, that is, its internal room for manoeuvre. Social movements are embedded in, and observe discourse and shape their 'reactive' strategies accordingly. Likewise, social movements in turn shape discourse through actionable strategies or framing, as they communicate what they reason about and thus that what is conceivable. In other words, the enablement and restriction of social movements on the one hand, and the conceptions and communication of social movements concerning the overall discourse is an on-going cycle. Thus, social movements' actions are arguably the product of its internal matters and discourse. Furthermore, discourse is shaped by social movements either by advocating thoughts that are not profound within the mainstream discourse or by being hostile to the most conceivable, policy's orthodox or hegemonic discourse. Social movement actors are by definition subjects that challenge power (Ibid.) and find themselves on the meso-level, pending between societal structures and individuals, though; communication within social movements also generates knowledge. This internal system of knowledge - or internal discourses - does not solely capture rationality and strategic power positions. Instead, it expresses a social movement's cultural identity that also functions as a source that enables and restricts members of the social movement. It is this rather neo-institutionalism that explains behaviour based on cognitive, normative and regulative ideals that influences organisations' compliance instead of simplistic efficiency criteria (Kortmann & Rosenow-Williams, 2013b).

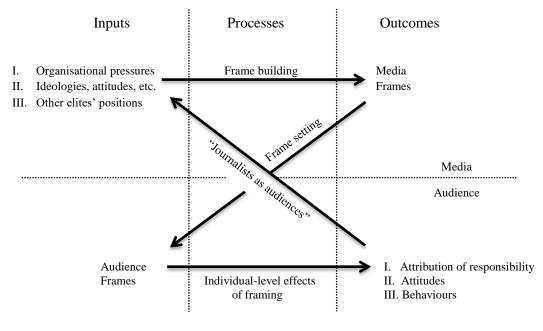
'Regimes of truth' - in which truth means the ordered system of procedures for production, regulation, distribution, circulation and operation of statements - characterise modern societies (Foucault, 1980). The circulation and operation of statements contribute to and can be thought of as guidance or frame of reference for social movements. The creation of 'truth' depends on the discursive formations of the 'object', enunciative modalities, concepts and strategies. Objects are not simply subjects or issues, but represent the rules for the shaping of that what we are talking about. The formation of an 'object' is about clarification, e.g., elucidating the responsible authorities, their relation to other bodies, other bodies' assessment, and the relation of the 'object' to other objects. Enunciative modalities point to speakers' position in relation to the object and the arena in which he or she spreads the message. The authority and expertise of speakers brings legitimacy, which is oftentimes closely associated with the arena in which the speaker operates. Concepts point to the dominant ways in which statements are constructed and connected, how they are ordered and subsequently combined in hegemonic discourses in the past. Concepts inform social movements as to the construction of new statements in a particular discursive field. Strategies are formulated within a certain episteme, that is, a specific structure of knowledge and coherent modes of rationalising in a particular time and space. Episteme are predefined factors that unconsciously affect actors' perception of a discourse. In other words, an episteme precedes a discourse as it makes a discourse possible for a particular cultural space (Baumgarten & Ullrich, 2016). Those four discursive formations delimit what can be said and thought of and provide the room for manoeuvre at the same time.

Even though, discursive opportunities are moulded by these four formations, the informality of discourse per se also means that cultural factors like values and ideological contradictions (Koopmans & Olzak, 2004) could incite social movements more easily in choosing a frame. The idea that cultural relations are to some extent shaped by the way conceptions of national identity, citizenship and church-state regimes are framed in majority-oriented public spheres is straightforward. Formalities and majority-oriented conceptions, say the dominant discourse, not necessarily accord. Moreover, there might exists cross-national differences with regard to the gaps between formalities and what is said and written within the dominant discourse, and thus certain cultural traits are more contested and consequently subjected to fierce debates. As pointed out earlier, discourse is less constrained as to clear demarcations and involvement of the publics. However, the successfulness of discursive interventions depends on several aspects too. As "discourse accounts for the difference between what can potentially be expressed and experienced and what is actually expressed and experienced in a given situation" (Bröer & Duyvendak, 2009, p. 339), there are still limitations. Within a discourse, only a certain combination of frames, feelings and thus arguments are available. Discourses change over time, and so do social movements' framing rules, that is, new policy language brings about reactions in social movements' strategies.

#### Media structure and framing: visibility, resonance and legitimacy

The essence of media coverage puts more relevance in this regard as by public visibility and the enormous supply of messages (see Figure 3). It is the visibility aspect of claims-making that impacts the public debate and policy deliberation in general. The cultural-religious discourse exposes the fault lines that separate cultural categories from one another, which are more fundamental than differences among political ideologies and are likely to trigger more profound political conflicts (Brubaker, 2015). Clashes or conflicts between cultural categories centre primarily on the relations between God and man, individual and group, citizen and state, rights and responsibilities, liberty and authority, and equality and hierarchy (foreseen by Huntington, 1993), and find their ultimate expression in claimmaking.

Figure 3: Process model of framing in the media<sup>7</sup>



Source: (Scheufele, 1999, p. 115)

"News media are the predominant gatekeepers, and among the claim makers institutional actors are strongly predominant" (Koopmans & Statham, 2010, p. 179) and "have the ability to select, shape, amplify, or diminish public messages" (Koopmans & Olzak, 2004, p. 203) and thus determine a message's potential to diffuse through the public sphere. The likeliness of a message being reported is dependent upon several variables such as geographical proximity (DeLung, Magee, DeLauder, & Maiorescu, 2012). It is beyond the scope of this search to discuss all these variables, as it suffices here

<sup>&</sup>lt;sup>7</sup> Frame building questions deal with the most fundamental aspects that impact the framing of news content, especially structural and organisational factors of media systems. Various sources contribute to frames that are broadcasted or spread. To wit, frames are constructed by ideology, professional values, guidelines, codes of conduct and organisational routines to which journalists must adhere. However, journalist-centred influences, that is, individual contributions, impact the way news coverage is framed. Besides, varying individual journalist's and organisational cultures, some external sources of influence can be observed, namely elites with an interest in a specific frame as political actors, interest groups and authorities. Overall, elites provide the foundational frame on which journalists incorporate their story. Frame setting deals with the salience of issue attributes, just like agenda-setting. However, the salience of a frame does not necessarily accord with the frame's perceived importance, as "frames influence opinions by stressing specific values, facts, and other considerations, endowing them with greater apparent relevance to the issue than they might appear to have under an alternative frame" (Nelson, Clawson, & Oxley, 1997, p. 569). The essential difference between salient frames and important frames by perception, deals with its accessibility and "the outcome of a more conscious process of information gathering and processing" (Scheufele, 1999, p. 116) respectively. The individual effects of framing are rather contested as there is no clear explanation how these two variables are linked, among others due to cognitive, attitudinal and behavioural lurking attributes and issue-specific frames. The linkage between audiences' or individual frames and media frames is primarily determined by gatekeepers' susceptibility to framing processes, as framing is not a hierarchical process. Copying of frames is oftentimes explained by ethics, time pressure and differentiation of sources.

to say that relevant and controversial issues are respectively relevant and controversial through previous rounds discursive interventions. Framing are "strategic attempts of political entrepreneurs to make issues 'resonate' within potential activists' existing cultural repertoires" (Bröer & Duyvendak, 2009, p. 338). Feeling rules are "guidelines for the assessment of fits and misfits between feeling and situation" (Hochschild, 1979, p. 566). A social movement's framing has to be 'culturally resonant' to a 'master frame' by addressing central values, or through the social position of its actors (Benford, 1997). This also means that social movements' cultural or ideological perspective can be a constraint *an sich* and that actors therefore select frames that accord with their cultural roots, more so than with the hegemonic discourse. This point of view shifts attention from strategic rational actor and goal-oriented motivations for picking frames to social movements' world views and ideologies.

The bridge that connects political opportunities and movement activists' decisions to act, is the perception, interpretation and framing of the opportunity window (Goodwin & Jasper, 1999), because discursive opportunity structure theory starts by acknowledging that "political opportunity structures affect movement action only when they are perceived as such" (Koopmans & Olzak, 2004, p. 199). However some opportunities, due to regime weaknesses or absence of media coverage, are not perceived which can be called 'nonopportunities' (Gamson & Wolfsfeld, 1993), emphasising the essence of public visibility. Because movement actors "are not full-time political analysts who closely follow and gather independent information on what is going on in the corridors of power, and who have an intimate knowledge of the institutional intricacies of the political system" (Koopmans & Olzak, 2004, p. 201). In other words, what people know about politics comes from media sources, signifying the increased importance of mass media and therefore a shift of theatre. "Media and communication usually feature as one of the peripheral factors that influence the degree of political opportunity for a social movement to succeed" (Cammaerts, 2012, pp. 118-119), and thus the battle over media attention - as trade-off between legitimacy and controversy - can be considered as the main influencer of all three actor categories in the public discourse, "with the electorate behaving like an audience in a theatre (Manin, 1997)" (as cited in Koopmans & Muis, 2009, p. 644). "Journalists and other newsmakers make a selection from raw news material on the basis of existing structural and symbolic power relations" (Koomen, Tillie, van Heelsum, & van Stiphout, 2013, p. 195). Herein lays again the institutionalised structural division of power that undergird discursive framing, and thus power relations influence the public debate. Social movements are located between macro- and microstructures and thus – along with the logic of membership and the logic of influence (Schmitter & Streeck, 1999) – need to construct their message in such a way that it resonates in the preferable manner. Gamson and Wolfsfeld (1993) see social movements' reliance on mainstream media for some associated purposes, namely to increase the legitimation and validation of their interests and demands, to mobilise political support for it, and to enable them to widen the scope of conflict beyond the likeminded (Gamson & Wolfsfeld, 1993). "The interaction between social movements and political authorities is increasingly a mediated relationship in which direct physical confrontation is replaced by discursive confrontations in the public sphere" (Koomen & van Heelsum, 2013, p. 81). In other words, the interaction of parliamentary and extra-parliamentary actors is for large parts played out via the media. The media provides a 'public arena' (Hilgartner & Bosk, 1988) "where political parties or social movements can test the efficacy of different mobilisation strategies, and where opportunities and constraints become visible by way of the public actions and reactions of other actors" (Koopmans & Muis, 2009, p. 644). So, media does not solely serve as platform for the diffusion of ideas, but also provides insights as to all involved social actors' successes and failures within a specific discourse. Learned lessons constitute to the replication of successful strategies and thus opportunities are recognised when participants gain more and more information. This strategy-building is largely cognitive based, while feeling rules enter protest activities at all stages, that is, affective and hostile feelings towards certain institutions, individuals, policies or other social movements. "One can defy an ideological stance not simply by maintaining an alternative frame on a situation but by maintaining an alternative set of feeling rights and obligations" (Hochschild, 1979, p. 567). This stance is common among governments too, as complaint agencies serve as legitimate forums of complaining and turns individual or group problems into public issues.

Besides public visibility, resonance and legitimacy are key influential opportunities for social movements and public actors. Both, framing – as active, processual and contentious endeavour (Benford & Snow, 2000) – and feelings are affected by 'resonance', that is, repercussion or echoing.

Resonance refers to responses, either supportive or rejecting, to a movement's action or point of view by other social movements or public actors that have a special interest and position in the public debate themselves. Such reactions imply the replication of the original message, point of view or claim and thus "public actors choose to ignore social movement actors in an attempt to deny them the [crucial] attention" (Koopmans & Olzak, 2004, p. 204) sometimes. In this view, resonance can be considered as an extension of the public visibility condition; however, it is the effect that the discursive message brings about. Prominent discursive messages, in the eyes of the gatekeepers, will be diffused and thus are likely to provoke reactions. Every reaction to either the original message or to one of the responses implies the replication of the original message. This chain of reactions causes the resonant message to travel farther. Koopmans and Olzak (2004) refer to supportive resonance as 'consonance' and negative resonance as 'dissonance' (Ibid.). Consonance implies that individuals perceive opportunities the way they are defined in the dominant political discourse, and thus act as expected. As discourse is defined as exactly that what can be said and thought about in a specific setting in a particular point in time, replication an sich is an interesting phenomenon. Especially dissonance, because "while a message is being criticised, it is at the same time amplified through repetition" (Bröer & Duyvendak, 2009, p. 340). To deal with dissonance, individuals could use argumentative devices as exaggerating, ridiculing and interpreting a message in the most negative way. Dissonance can take various forms, as individuals could even deny the existence of the opportunities brought about by a discursive message (Stapleton & Wilson, 2009). Still, denial in itself proves that discursive opportunities affect people.

This highlights the very essence as criticism of that what lays within the boundaries of what can be said and thought about exposes the extremes for smuch the dominant discourse. Although repetition suggests controversy, the ratio of positive and negative reactions in the public sphere does matter. It is the legitimacy of the claim: say the overall positive reception of a claim that is totally independent from resonance, simply because there might be a trade-off between the two. A highly legitimate claim might not resonate as it brings common-sense and does not bring controversy, while an illegitimate claim could resonate far due to its controversial argument. It is therefore not surprising that structural issues as citizenship rights are less debated in national newspapers than forms of racism or Islamophobia (Garner & Selod, 2015). Also, the agenda of political authorities and representatives of Muslim organisations are reflected by the public discourse (CORDIS, 2014b), as "[e]thnic mobilisation can manifest itself in parliamentary or extra-parliamentary politics. While ethnic minority mobilisation is institutionalised in the political arena through ethnic parties, in the extra parliamentary arena it is structured by ethnic social movements (Olzak, 2006, pp. 42-47)" (as cited in Strijbis, 2015, p. 1). Ideally, social movements speak out legitimate messages that have high resonance. In short, public visibility, resonance and legitimacy all have explanatory value in the construction of discourse, the circulation and operation of statements. This circulation and operation of statements is also influenced by the discursive formations of the 'object', enunciative modalities, concepts and strategies. Discourses change and thus feeling and framing rules do too, providing new opportunities or conflicts between coercive power and social movements. In order to define the hegemonic discourse, the intervening actors, the addressed issues and state's orthodoxy in the public debate must be set out. Still, "church-state relationships can be beneficial for incorporation of Muslims or adversely affect issues that pivot on the accommodation of Muslims. In countries that pursue inclusiveness and easier access to citizenship rights, the incorporation of Muslims as a group will thus be more advanced" (Carol, 2016, p. 18).

#### Recapitulating discursive contestation

Group demands and claim-making will be discussed further below, it suffices here to say that a claim is the "strategic action in the public sphere, consisting of the expression of a political opinion by some form of physical or verbal action, regardless of the form this expression takes (press statement, political decision, protest event, court ruling etc.) and regardless of the nature of the actor" (Carol & Koopmans, 2013, p. 174). It is important to understand whether, where and why there exist differences between the opinions of Muslims and national majorities on the religious accommodation of Islamic practices. Where huge 'gaps' exist, potential conflict lurks and thus indicates exclusion and oppression in everyday encounters between Muslims and national majorities (Van der Noll & Saroglou, 2015).

The perception of a discourse can be considered as the thread of public contestation. The context is provided by public debates carried by mass media that – as mentioned earlier – serve controversies over Muslim group rights. Controversy, however, might have different forms, as any contra-claim against state policy can be considered as controversial or the interpretation of liberal values might induce controversial statements. In general, controversy goes hand in hand with sensitivity "that is, issues dividing the Muslim community from the non-Muslim community" (Koomen & van Heelsum, 2013, p. 80). With regard to claims, several dimensions are of interest as to the contributions to the public discourse. The product of claimants, the form, the addressee, the substantive content, the object, and justification of the claim is what contributes to the public discourse (Tillie et al., 2013). Those dimensions are to some extent traced from public visibility, resonance and legitimacy, as claimants, form, addressee, substantive content, object and justification construct discourse.

Overall, resonance is a phenomenon that reproduces, and challenges all involved stakeholders and groups. Individuals get to live by the discourse and consequently learn to feel, rationalise and act with it (Ramadan, 2009). Rationalisation and emotionalisation respectively result in framing and feeling rules that combined constitute individuals' subjectivity and personal discourse. This interplay between changing political and personal discourses bring about new opportunities or restrictions. Conflicts arise when the hegemonic political discourse barely overlaps with that of a social movement, that is, social movements struggle against coercive power. The institutional side of opportunity structures provides clear structural demarcations forasmuch the formalities of citizenship, its accompanied rights and obligations, and the regulation of cultural difference; institutions can as well be considered as a form of communication. Discursive opportunity structures are formed by the symbolic interpretation of those formalities. Subsequently, "[c]ross-national differences in the institutional and discursive opportunity structures find expression in national variations in the political claim-making in the public sphere" (Koomen et al., 2013, p. 200).

Overlap between institutional opportunity structure and discursive opportunity structures can be found there where some social movements' speakers are excluded from certain arenas as a matter of legitimacy. Also, discourses could be anchored in institutions, signifying a hegemonic or dominant discourse. Thus, discourse feed politicians in such a way that regulations could be initiated, while institutions inform social movements to what extent they could mobilise and effectively make claims. This means that "cross-national differences in a systematic logic of relations in the integration debate will translate into different discursive reproductions of integration in the public sphere" (Ibid., p. 199). However, besides the formalities, the public debate is subjected to a specific logic system that distinguishes and categorises in an inclusive or exclusive way. It is the Orientalist fabrication in media representation that homogenises Muslims' values, ideologies and the Islamic religion per se. Some see Orientalist fabrication as a tool of self-identification in times of a European identity crisis (Ramadan, 2006). In other words, Islam is portrayed as an identity category and thus boundary marker in European societies, although in different manners. These factors undergird national debates on Muslim group rights, carried out by mass media bringing controversy and 'priming' (Tillie et al., 2013) that challenges or align with states' policies (Jenkins, 2007). Moreover, the publics are informed through mass media "because this is the agenda-setting supply-line of political information that is publicly visible and accessible in a society" (Statham, 2016, p. 218) enplane the boundaries of what can be legitimately felt and demanded. However, the direct link between the formal policy side and discursive framing of claims remains ambiguous due to strategic polysemic attribution of meanings to outwardly similar expressions.

b. Group demands and claim-making for Islamic religious practices

Having set out the institutional and discursive constraints and forms of opportunities that social movements and thus Muslim organisations have to deal with and utilise respectively, this section discusses claim-making and group demands. A claim is a "formally request or demand; say that one owns or has earned" (OxfordDictionary, 2017b) something. More specifically, religious claims are "entitlements regarding the performance [...] or non-performance [...] of certain actions for religious reasons, or they are about entitlements that require others to perform [...] or refrain from performing [...] certain actions for religious reasons" (Carol & Koopmans, 2013, pp. 166-167) in the public sphere. A claim can have various expressive forms, namely verbal texts or physical action and always

delivers a message or political opinion concerning rights, obligations or both. So, statements in newspapers, violent protests, speech acts, demonstrations and court rulings are possible claim-making tools. Moreover, everybody can make claims in the public sphere regardless of the nature of the actor (Guigni & Cinalli, 2010). Claim-making and group demands must be studied in the light of rationalising institutional structures and emotionalising discursive structures; as 'effective prioritisation', that is, to act according one's priorities, is a product of rationalisation and emotionalisation (Chesters & Welsh, 2010; Ramadan, 2013). There is an explicit recognition by social movement scholars that emotions play an important role in social movements' agenda-setting (Aminzade & McAdam, 2002; Jasper, 2011).

Discursive structures are carried by institutional ones due to specific national historical and political situations; thus the selection in mass media by gatekeepers is a by-product and differs across countries. In national integration debates, it is therefore likely that selection is made based on national traditions and so "affect the specific focus and steer the debate towards issues that resonate well within a certain political climate" (Koomen & van Heelsum, 2013, p. 82). As put forward earlier, liberal states' policies as to multiculturalism could as well counteract as contribute to states' capacity to ensure social cohesion and conceptions of rights on which liberal democracies rest. Problems arise, however, when conceptions of those rights are challenged or even new demands are on the table. The challenge of religious accommodation is to find a balance between non-Muslim majoriteis and Muslim minorities when it comes to granting equal or parity rights on the one hand, and preventing any kind of discourse that brands such advancements as a threat to existing privileges and the dominant religious-cultural identity.

"Group demands' is an umbrella term for the political field of claims by migrants for groupspecific rights, recognition, and exemptions from duties, with respect to the cultural requirements of citizenship in their societies of settlement" (Statham et al., 2005, p. 430). Group demands have two main features. First, group demands go beyond that what is already institutionalised in a set of common civil and political rights that comes with individual citizenship. Second, adhering group demands presupposes the recognition and accommodation of a particular distinctive identity and its needs by the state (Yukleyen, 2012). It is exactly the institutionalised set of common civil and political rights and obligations of individual citizenship that functions as the migrants' institutional room for manoeuvre. However, the nature of religion and its perceived authoritarian position vis-à-vis the state by a pin-size minority, influences the likeliness of adaption or resistance towards the dominant culture. Also, in adhering group demands, the state must respect the pre-existing institutional context, as the non-Muslim majority has well-defined interests too. It is precisely therefore that cultural conflicts oftentimes take place in institutional settings (Statham et al., 2005). There exist, just like the various forms of church-state relations, different kinds of group demands and granted rights for Muslims across Europe, which are associated to one another.

The controversy of claims for religious rights stem from three particular dimensions. First, the already discussed church-state regimes, which determine the extent in which religious rights in public domains such as schools, polices and the army, are allowed. Second, the nature and scope of the claim, that is, whether the claim belongs to mainstream Muslim practices and is also perceived this way by the non-Muslim majority. In other words, the claim can involve a practice which is common and thus practised by the majority, or more orthodox and practised by a small share of Muslims. Third, the extensiveness of the claim implies that whether or not a renegotiation of the existing church-state arrangements is necessary. As church-state relations are institutions based on secularism and the relation between state and Christianity, the question arises whether there is an equivalent right granted to Christians (Carol & Koopmans, 2013). These three dimensions determine whether a claim can be considered as obtrusive. Besides the visibility aspects of Islamic traits, we could assume that claims that involve rights in public institutions, for orthodox practices and without a Christian equivalent right in play, provide more contestation and potential conflict. Based on an institutionalised Christian equivalent right, one could label a request either an 'exceptional' or 'parity' group demand. Exceptional group demands involve rights that are not yet granted to other native cultural or religious minority groups. In other words, exceptional rights embody a new accommodation category. For some, exceptional group demands challenge the very essence of a unified and undifferentiated citizenship and therefore the objectives of solidarity and cohesion (Statham et al., 2005). Parity group demands are requests that seek for equality or equity, since such demands involve privileges and exemptions from duties that already are granted to other native cultural or religious minority groups.

Opportunities for Muslim rights claims can be expected to be more favourable in pluralist or multiculturalist regimes than in monist or assimilationist regimes, and therefore denying Muslim rights is more difficult in pluralist or multiculturalist regimes, especially when there is a Christian or Jewish precedent. At the same time, this suggests that more obtrusive claims can be expected in multicultural and pluralist regimes, such as the Netherlands and the United Kingdom, bringing about other claims and demands than in monist or assimilationist regimes. In sum, institutional structures certainly impacts claims and public contestation. Consequently, the nature of citizenship regimes incite the painful conflict "between the obligations of citizenship and the demands of faith" (Rosenblum, 2000, p. 11). Obviously – because of the right of religious freedom – faith an sich is allowed per article 18 *Right to freedom of thought and religion* of the Universal Declaration of Human Rights. This article<sup>8</sup> states that "everyone shall have the right to freedom of thought, conscience and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private, to manifest his religion or belief in worship, observance, practice and teaching". However, as to "manifest his religion or belief in worship, observance, practice and teaching" (Ibid.) remains somewhat indecipherable and thus contested. Group demands around which public conflicts centre are often visible Islamic traits, such as buildings and headscarves, and whether or not the demand involves public institutions. What is allowed and what is not constitutes national formal institutions (Tillie et al., 2013). Here is where Talal Asad his anthropology of Islamic tradition becomes interesting. Asad analyses Islam as a discursive tradition that established orthodoxy and orthopraxy passes on centuries and generation. "A tradition consists essentially of discourses that seek to instruct practitioners regarding the correct form and purpose of a given practice that, precisely because it is established, has a history" (Asad, 2009b, p. 14) and thus instructions relate to the past, the present and future (Anjum, 2007), that is, orthodoxy and orthopraxy dominate Islamic discourses in the present and future. The essence of religious conduct, faith, grace and rituals only require efficacy through social and political instruments and "processes in which power, in the form of coercion, discipline, institutions, and knowledge, is intricately involved" (Ibid., p. 660).

States have different ways in approaching Muslim immigrants culturally and religiously. As put forward earlier, the strictness of separation between church and state is typically reflected in the extent in which religion is allowed within public institutions. At the same time, "It he study of claimsmaking has generated important insights into the content of mobilisation among migrant groups by analysing the quality of the claims made in the field of citizenship politics. Hence, this [contributes] considerably to the knowledge about migrants' political behaviour in the extra-parliamentary arena" (Strijbis, 2015, p. 2). In order to get a comprehensive overview of dealing with immigrants' cultural and religious differences, the formal and informal spheres provide different opportunities. Moreover, debates differ cross-nationally. In comparing institutional opportunity structures (Tillie et al., 2013, pp. 43-46) with discursive opportunity structures (Ibid., p. 56) on highly controversial and debated issues, we can grasp the different opportunities of Muslim minorities across the four selected countries. The issues to be covered are picked on the basis of contestation as it is outlined by the EURISLAM project and must be divided into two categories, namely Islamic religious practices outside or inside public institutions. The first category includes ritual animal slaughtering, the Islamic call to prayer, purpose built mosques with minarets, separate cemeteries or special burial sites for Muslims, and burial without coffin. The second category includes Islamic (state) schools, Islamic religious classes in state schools, state funding Islamic schools, Imams in military, headscarf for students, headscarf for teachers, Islamic religious programs in public broadcasting, and Imams in prisons. Then, the difference – say 'gap' – between the nature of institutional arrangements concerning religious practices and the nature of the national debates, suggest public contestation. The hegemonic tone within the discursive realm might conflict with the institutional accommodation of religious practices; or that restrictive national policy is backed by a rather negative tone in the public debate. The tables below highlight the differences between countries forasmuch the allowance of religious practices. It also shows 'the gaps' between institutions and national debates. The similarities between

<sup>&</sup>lt;sup>8</sup> http://www.ohchr.org/EN/ProfessionalInterest/Pages/CCPR.aspx

the countries are twofold. First, the visibility of purpose-built mosques with minarets is indeed much discussed topic in all four countries. Second, education - as public institution - is a matter of much discussion (Berglund, 2015; Coughlan, 2016; Dronkers, 2016; Hunter-Hénin, 2016; Pommereau, 2010) as well for religious schools and classes per se as concerning the allowance of wearing headscarf for students and teachers.

Institutional	open	relatively open	moderate	relatively restrictive	restrictive
Discursive <sup>9</sup>	positive	relatively positive	moderate	relatively negative	negative
	1	1	0	-1	Х

Table 1: Institutional classifications for France, The Netherlands, The United Kingdom and Germany<sup>10</sup>

France			The Netherlands		
Issue	Ι	D	Issue	Ι	D
		-	ractices outside public institutions		
Ritual slaughter	1	1	Ritual slaughter	1	0
Islamic call for prayer	Х	1	Islamic call for prayer	1	0
Purpose-built mosques with minarets <sup>11</sup>	0	1	Purpose-built mosques with minarets	1	-1
Separate cemeteries or special burial sites	-1	1	Separate cemeteries or special burial sites	0	
Burial without coffin	Х	$\checkmark$	Burial without coffin	$\checkmark$	
Allowance of Islamic	religi	ous p	practices inside public institutions		
Islamic (state) schools	Х	1	Islamic (state) schools <sup>12</sup>	$\checkmark$	0
Islamic religious classes in state schools	х		Islamic religious classes in state schools	1	1
State funding Islamic schools	Х		State funding Islamic schools	1	
Imams in military	1	1	Imams in military	1	
Headscarf for students <sup>13</sup>	х	1	Headscarf for students	1	-1
Headscarf for teachers	х	0	Headscarf for teachers	1	-1
Islamic religious programs in public broadcasting	х		Islamic religious programs in public broadcasting	1	1
Imams in prisons	1	1	Imams in prisons	1	
			*		
The United Kingdom			Germany		
Issue	Ι	D	Issue	Ι	D
Allowance of Islamic religious practices outside public institutions					
Ritual slaughter	$\checkmark$	0	Ritual slaughter	1	-1
Islamic call for prayer	1	-1	Islamic call for prayer	0	-1
Islamic call for prayer Purpose-built mosques with minarets	1 ✓	-1 1	Islamic call for prayer Purpose-built mosques with minarets	0 1	-1 0
Purpose-built mosques with minarets Separate cemeteries or special burial sites	1 ✓ ✓	-			
Purpose-built mosques with minarets	1	1	Purpose-built mosques with minarets	1	0
Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin	✓ ✓ 1	1 1 1	Purpose-built mosques with minarets Separate cemeteries or special burial sites	1	0
Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin	✓ ✓ 1	1 1 1	Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>practices inside public institutions</i> Islamic (state) schools	1	0 ✓ ✓ −1
Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>Allowance of Islamic i</i>	✓ ✓ I religi	1 1 1 ous p	Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>practices inside public institutions</i>	1	0 ✓
Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin Allowance of Islamic and Islamic (state) schools	✓ ✓ 1 religi 1	1 1 1 ous p	Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>practices inside public institutions</i> Islamic (state) schools	1	0 ✓ ✓ −1
Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>Allowance of Islamic a</i> Islamic (state) schools Islamic religious classes in state schools	✓ ✓ 1 religi 1	1 1 1 ous p	Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>practices inside public institutions</i> Islamic (state) schools Islamic religious classes in state schools	1	0 ✓ ✓ −1
Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>Allowance of Islamic t</i> Islamic (state) schools Islamic religious classes in state schools State funding Islamic schools	✓ ✓ 1 religi 1	1 1 1 0us p 0	Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>practices inside public institutions</i> Islamic (state) schools Islamic religious classes in state schools State funding Islamic schools	1 0 -1 1 ✓	0 ✓ ✓ −1
Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>Allowance of Islamic &amp;</i> Islamic (state) schools Islamic religious classes in state schools State funding Islamic schools Imams in military	✓ ✓ 1 religi 1	1 1 1 0us p 0	Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>practices inside public institutions</i> Islamic (state) schools Islamic religious classes in state schools State funding Islamic schools Imams in military	1 0 -1 1 ✓	0 ✓ ✓ −1 0
Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>Allowance of Islamic a</i> Islamic (state) schools Islamic religious classes in state schools State funding Islamic schools Imams in military Headscarf for students Headscarf for teachers	✓ ✓ 1 religi 1	1 1 1 0us p 0	Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>practices inside public institutions</i> Islamic (state) schools Islamic religious classes in state schools State funding Islamic schools Imams in military Headscarf for students Headscarf for teachers	1 0 -1 1 ✓	0 ✓ ✓ −1 0
Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>Allowance of Islamic T</i> Islamic (state) schools Islamic religious classes in state schools State funding Islamic schools Imams in military Headscarf for students	✓ ✓ 1 religi 1	1 1 1 0us p 0	Purpose-built mosques with minarets Separate cemeteries or special burial sites Burial without coffin <i>practices inside public institutions</i> Islamic (state) schools Islamic religious classes in state schools State funding Islamic schools Imams in military Headscarf for students	1 0 -1 1 ✓	0 ✓ ✓ -1 0

<sup>&</sup>lt;sup>9</sup> The grey boxes highlight the most frequent discussed religious practices (Tillie et al., 2013) <sup>10</sup> (Dassetto & Ferrari, 2007; WZB, 2017)

<sup>&</sup>lt;sup>11</sup> 0 = 1528 (Allievi, 2010, p. 20 via http://www.nef-europe.org/wp-content/uploads/2013/03/mosques-in-Europe-fullpdf.pdf)

<sup>&</sup>lt;sup>12</sup> (Dronkers, 2016)

<sup>&</sup>lt;sup>13</sup> https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000417977&categorieLien=id

More interestingly, however, are the differences between institutional accommodation of practices and the tones that dominate national debates concerning those practices. For France, we see huge discrepancies when it comes to separate cemeteries or burial sites and burial without coffin. However, as the allowance of Islamic (state) schools and headscarves for students receives more attention, those two issues can be labelled as main controversies. The situation in the Netherlands is somewhat different, as it allows quite some Islamic religious practices. However, likewise discussions related to Islamic (state) schools, headscarves for students and teachers show the biggest gap between the institutional side and the discursive realm. For the United Kingdom, the discrepancy between institutions and discourse when it comes to the headscarf controversy concerning students seems to be the main topic. For Germany, Islamic religious classes in state schools and headscarves for teachers embody the main gaps. In Germany, there is a general tendency that - except for the religious practices related to the deceased – national debates are rather negative compared to the institutional determinants. This can also be noted for the Netherland and the United Kingdom. In France on the other hand, seems the national debate relatively more positive than the institutional accommodation for Islamic religious practices. Another striking feature for France is its very restrictive institutional dimension when it comes to religious practices inside public institutions, while Germany seem to maintain a more tolerant stance towards religious practices inside public institutions than religious practices outside public institutions.

The four tables not necessarily indicate to what extend a group demand can be considered as exceptional, because all four countries maintain different church-state models, that is, the position of Christianity within such regimes differ. For instance, the United Kingdom privileges the Anglican Church and therefore granting equal or parity or even exceptional rights to Muslims would imply a renegotiation of the church-state regime. Even though the term 'parity rights' can embody a universal meaning, the practicalities of such claims differ extensively across countries. The nature of a claim or group demand should thus be studied in the light of rationalising the institutional field and emotionalising the discursive realm in which a Christian equivalent right can be found between the two. Consequently, we can expect that an equivalent Christian right can serve the rational side of claim in countries where no religion is institutionally privileged, such as France and the Netherlands. Moreover, a Christian equivalent right can trigger emotions in countries where one specific religion is institutionally privileged (e.g., the United Kingdom) or receives practical advantages (e.g., Germany). Overall, the institutional determinants for every single religious practice should be taken as reference point, which along with Muslims' prioritisation determines whether claims and group demands will be made. From there, a claim's 'obtrusiveness', say claims with a "greater potential for conflict with the institutions and the dominant culture of the host society" (Cinalli & Giugni, 2013, p. 143) is the outcome of 'effective prioritisation' based on reasoning and emotions.

#### c. Islamophobia

This section discusses the epistemological, conceptual, dimensional and practical concerns associated with the concept of 'Islamophobia'. Islamophobia as social phenomenon existed arguably way before the term was initiated (Cesari, 2006a; Ogan et al., 2014). Initially, the stance that "Islam and Muslims were the implacable, absolute and eternal enemies of Christianity, Christians, Europe and Europeans" (Bravo López, 2011, p. 563) has surfaced across Europe for centuries, nurturing the 'enemy image'. The essence of an 'enemy image' is not merely feelings of antipathy or dislike, but also the chance of destruction and thus brings security concerns as explicated by the crusades. Nowadays, the term is often linked to racism. Racism is generally understood as the "prejudice, discrimination, or antagonism directed against someone of a different race based on the belief that one's own race is superior" (OxfordDictionary, 2017c), while Islam has no racial determinant as everyone could voluntarily convert to the religion. In other words, Islamophobia and racism are not *conditio sine aua* non of one another. Overlap might occur in practice, as minorities are targets of both phenomena in European states, but this does not take away the fact that the perceived nature of Islam triggers the phobia and not the race. Racism is based on an ideology that prescribes that mankind can be divided into different races, which have in turn natural and innate characteristics. Then, a historical power structure incites the racialisation, which means that specific traits or features of the demarcated group are natural and innate to every single member of that group; that is, generalising. Racialisation creates "group-ness', and ascribes characteristics, sometimes because of work, sometimes because of ideas of where the group comes from, what it believes in, or how it organises itself socially and culturally" (Garner & Selod, 2015, p. 14). The production, absorption and reproduction of demarcating and ascribing attributes to a group are what create a homogeneous bloc. Consequently, the negative valuation of traits and features are foundational to discrimination ranging from forms of denial to killings. However, the perceived threat of Islam provokes the racialisation of Muslims and the Islamic identity through the need for exposing and exhibiting the dangers. Ultimately, the Muslim will be identified based on the ethno-cultural traits from his or her origin, instead of the belief system.

The term 'Islamophobia' is contested for various reasons (see Bravo López, 2011 for an overview). The Rynnymede Trust's Commission on British Muslims and Islamophobia (CMBI) used the term for the first time in its report entitled 'Islamophobia: A Challenge for Us All'. The CMBI defined Islamophobia as the "unfounded hostility towards Islam, and therefore fear and dislike of all or most Muslims" (RunnymedeTrustReport, 1997, p. 4). One fundamental question this report posed, dealt with the difference between criticism and disagreement about Islamic modes of living in liberal democracies on the one hand and unfounded prejudice and hostility, that is, Islamophobia on the other hand. In other words, from what point do we actually talk about unfounded prejudice and hostility, as some even argue that the resistance against Islamic schools funding is a form of Islamophobia (J. R. Bowen, 2009). According to the CMBI, the degree to which positions towards Islam and Muslims are open or closed should be assessed through the following eight pillars: (a) whether Islam is seen as monolithic and static, or as diverse and dynamic; (b) whether Islam is seen as other and separate, or as similar and interdependent; (c) whether Islam is seen as inferior, or as different but equal; (d) whether Islam is seen as an aggressive enemy or as a cooperative partner; (e) whether Muslims are seen as manipulative or a sincere; (f) whether Muslim criticism of 'the West' are rejected or debated; (g) whether discriminatory behaviour against Muslims is defended or opposed; and (h) whether anti-Muslim discourse is seen as natural or problematic. The closer the position towards Muslims and Islam, the more likely it is that forms of discrimination, exclusion, violence and prejudice occur. Islamophobia can be analysed as a social phenomenon based on a very clear conceptualisation. It could also be seen as cultural-ideological outlook "that seeks to explain ills of the (global) social order by attributing them to Islam" (Semati, 2010, p. 266). It is exactly this 'global' in parentheses that emphasises the glocal effects of fear. The "growing fear of insecurity making individuals more and more heteronomous in a way that essentialises communal, ethnic, cultural, linguistic, and religious boundaries" (Cesari, 2014, p. 748). More strikingly perhaps is that European states believe to know all about Islam, while at the same time 'the Other' inspires fear and rejection among non-Muslim majorities (Lathion, 2015). In other words, knowing 'the Other' or more controversially the 'enemy image' seem to be an insufficient condition for confining Islamophobia, as it rises in various forms (Bayrakli & Hafez, 2016; von Rassismus, 2006).

We could define Islamophobia as a discourse as it flows through society not merely as a concept, but as a social phenomenon too (Bravo López, 2011). Islamophobia is a feature of modern governmentality that through the double logic of globalising internal moral opponents and localising faraway moral enemies, travels between states, societies, individuals and therefore produces subjects. I see Islamophobia typically as an institution that exemplifies the different modes of governmentality, that is, the difference between monopolised political power exercised by the state as agent, and governing through a discourse that operates as an informal non-political strategy. So, Islamophobia discourses create subjects through various ways; say formal, political, cultural, nationalist, socioeconomic, religious and security-related discourses bring about weight to the concept and the interpretation thereof. However, the tolerance of discourse is encapsulated in states' power position (Brown, 2006), while at the same time states define discursive field by means of overemphasising, justifying and specifying the rationalities behind policy. The way governments define their arguments and justifications contribute to frame-setting, which ultimately bring about narratives on related issues. A many used example is the introduction of citizenship tests (Joppke, 2008; Orgad, 2010). The restrictive turn of citizenship regimes by means of cultural tests, is oftentimes explained as a selection mechanism that "restrict the immigration of unqualified candidates" (Cesari, 2014, p. 756). The rationale behind citizenship reforms are widely believed to be associated with the prime objective of keeping out the Muslim-origin immigrants that reject European values and mode of living. It is such rhetoric – which sometimes survives and sometimes crumbles down – that incites different points of view.

Even though, the term is relatively new and contested, it also is widely used for a very diverse array of instances, that is, passive forms and far-reaching – illegal – forms. First, the excessive media coverage on anything related to Islam and Muslims, which is rather negative (Ahmed & Matthes, 2016), brings a stigmatising and generalising effect (Lathion, 2015). Second, the scarce communication channels through which Muslim community representatives and politicians interact and the difficulties those Muslim community leaders face when it comes to representing their very diverse set of members, complicates matters. Here is where I see another overlap between institutional and discursive structures. The members of Muslim organisations are subjected to generalisations, stigmatisation and negative portrayals, while at the same time the scarcity of profound communication channels constrains them in the institutional realm. It is therefore not surprisingly that Muslim representatives engage and respond differently towards negative classifications in the media. A limited number of Muslim organisations and groups make claims in newspaper articles (Cinalli & Giugni, 2013), relatively to other actor categories. Muslim organisations might deal with negative tones in media discourses in various ways. Some organisations react defensively, that is, the organisation defends the Islamic faith publicly, protests against the negativities and aims to communicate a more positive image externally and internally. This strategy highlights the logic of membership and logic of influence (Schmitter & Streeck, 1999), say the synchronisation of the internal and external strategy. Other organisations react evasively or passively, so that the organisation primarily centres on its internal goals and avoids debates as much as possible. Nonsensical debates are not entered, while internal cohesion is taken care of due to emphasising the ridicule. Other representatives discuss the discourse with other authorities in order to pacify with the non-Muslim majority. Such strategies are aimed to find common ground and similarities (Tillie et al., 2013). Essentially, Muslim communities' strategy to engage in political circles depends on their desire and perceived opportunity to promote their 'social normalisation' (Frégosi, 2013).

"We already know that media play a big role in framing the public discourse about Muslims and Islam in Europe" (Ogan et al., 2014, p. 29), especially for those who rely on media sources, as some nationals do not interact with Islam at all. We also know that public discourses differ among countries, as the French integration debate is dominated by social values, particularly dignity and equality, while in Germany the 'Deutschland schafft sich ab' provoked quite some contestation about the socio-economic consequences of the failed 'multikulti' concept (Sarrazin, 2011). In the United Kingdom, the main concerns related to the 'threat' of Muslims centred on extremism in relation to terrorism (K. Moore, Mason, & Lewis, 2008). In this regard, the Netherlands takes a special position as it is the prime concept of multiculturalism that triggers contestation; whether the Dutch open approach incited a utopian version (Entzinger, 2014). The rise of anti-Muslim narrative has therefore different dimensions. I see Islamophobia as the product of a discursive form of governmentality, that is, the majority-oriented public discourse in mass media is dominated by virtual Islam images. Virtual Islam images are embedded in structures of meanings and have the possibility to diffuse, especially when it involves controversy. Furthermore, Islamophobia has two main functions, namely it serves to preserve and enhance self-esteem by non-Muslim majorities and it offers control and legitimises hierarchies for both, the state and non-Muslim majorities. (Zick, Küpper, & Hövermann, 2011)

#### A comparative overview: Islamophobic dimensions per country

Islamophobic discourse in France is primarily shaped by the terrorist attacks targeting *Charlie Hebdo* on January the seventh in 2015, and the November attacks killing 130 civilians later that year. The ambivalence of the term Islamophobia in France – just like Anti-Semitism and Xenophobia – is based on France's huge Muslim population and hesitancy to use the sensitive, painful concept as Islamophobia is not included in its 1972 law on discrimination<sup>14</sup>. France does not maintain ethnic or religion statistics, because the Republic considers ethnic or religious families as anathema, and emphasises the obligations and rights of the individual. Nevertheless, the increased number of reported assaults, aggressive and discriminating behaviour against Muslims has risen significantly during the

<sup>&</sup>lt;sup>14</sup> https://www.legifrance.gouv.fr/jo\_pdf.do?numJO=0&dateJO=19720702&numTexte=&pageDebut=06803&pageFin=06804

first half of 2015 (CCIF, 2016). Such incidents provide just one form of Islamophobic practices, as discrimination against Muslims on the labour and housing market embody other forms, although hard to measure. However, as discrimination must not only be considered as a pragmatic problem, it must also be apprehended as a constraint to mobilise. So, Islamophobia is also a train of thought, as M. Valfort (2015) suggests that "France is caught into a vicious circle wherein discrimination against minorities fuels their inward-looking character, which in turn exacerbates the very discrimination they are the victims of" (Valfort, 2015, p. 94 as cited in Bayrakli & Hafez, 2016, p. 163). This vicious circle also applies to the housing market, creating a 'self-ghettoization' which is – according to adherents of communautarisme – a by-product of liberalism. Islamophobia cannot entirely be disentangled from *laïcité*, nor can it be framed solely as a national matter as huge differences persists throughout France. First, Frenchmen see three main pillars of *laïcité*, namely living together equally, restrictions on religious displays in public spaces, and separation of church and state. Second, these pillars induce different interpretations as to whether *laïcité* can be considered as way of governing or bulwark against Islam. The aftermath of both terrorist attacks not merely dominated newspapers' headlines, but also the regional elections while immigration issues, law and order, anti-terrorism, and Islam are national matters. Some even label Islamophobia as a 'state-sponsored discourse', as demonisation of Muslim institutions and mosques through police or gendarmerie raids more or less provoke and legitimise Islamophobic behaviour (Bayrakli & Hafez, 2017). Consequently, the normalisation of hate speech in the public sphere - along with controversies, such as the burkini hysteria – feeds Islamophobic discourse (ECRI, 2016). The European Commission against Racism and Intolerance sees that many Islamophobic cases are located in public services as hospitals, city halls, schools and universities. Overall, one could state that Islamophobia is a reality and discourse, while some forms are highly subjective as *laïcité* per se is considered to be Islamophobic by some. The terrorist attacks in France also provoked national security debates in the Netherlands. However, the difference between parliamentary responses and extra-parliamentary mobilisation could be found in the extent in which Islam is associated with terrorism; except for Geert Wilders' PVV (Freedom Party). The debate on closing the borders was therefore bipartite, because national security arguments and Islamophobic political discourse could easily have been synchronised, that is, keeping the 'enemy image' out. Islamophobia as a predefined sense of being a deviant and underappreciated group creates distrust between Muslims and politicians, media and the police. "Islamophobia manifests itself in many spheres of life, in blatant and violent practices, in structural arrangements, in subtle interpersonal communication and in different sectors of society" (Bavrakli & Hafez, 2016, p. 381). The manifestations of Islamophobia in the Netherlands are hard to specify, as many incidents seem to be related to Syrian refugees rather than Muslim as religious category. However, ever since 2010, discriminatory acts against mosques increased. Incidents against mosques symbolise the hardening of opinion concerning Islam, since resistance against new mosques are locally decided but attract national media that spread controversy, as in Gouda (Van der Valk, 2015). Many locals were afraid that the construction of a mosque in their backyard would negatively affect their house prices. It is the mere reasoning and assumption that an Islamic prayer house is an undesirable variable for potential buyers too. But also in the aftermath of the Paris attacks, mosques remained the focal point of Muslim hatred as during 2016 thirty-five mosques were subjected to discriminatory aggression (Ibid.). Just like Front National in France, Geert Wilders' PVV fuels negative sentiments "not only on a discursive level but increasingly to transform them into, thus far, legal extra-parliamentary social actions such as those against mosques" (Bayrakli & Hafez, 2016, p. 392), and Twitter. In the Netherlands - unlike France – Islamophobia has found a spot on the political agenda, as well in parliamentary as extraparliamentary domains. The significant political shift in the United Kingdom in 2015 – highlighted by an unexpected victory of May's Conservative Party - brought about several changes, to wit securitisation<sup>15</sup>, that impacted Muslim minorities. Events like the terrorist attacks in Paris, the rise of 'Daesh' and the 'Trojan Horse plot' (BBC, 2015) fuelled the security concerns. Just like the Netherlands, data on anti-Muslim hatred is questionable as the problem of double discrimination lurks, that is, the fear of further discrimination by authorities. Overall, the Counter-Terrorism and Security Act 2015 has been a trigger for creating a hate environment as there seem to be reason for surveillance and thus fear; the politicisation of the British police forces is such a consequence, as it acquired more

<sup>&</sup>lt;sup>15</sup> http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted

discretion for invading private places. Moreover, the face veils for women trigger questions as to whether gender differences within Muslim communities do or do not signify the impossibility to make integration of Muslims work at all. More importantly, the Brexit campaign also incited anti-Muslim rhetoric particularly with regard to welfare dependencies and lack of economic contribution to the British economy (Swami, Barron, Weis, & Furnham, 2017). The actualisation of Brexit, its disarray and instabilities prevent any political reaction to Islamophobic attack until now. Islamophobia as praxis is not the consequence of the rise of the far-right, but merely an outcome of hardened laws and institutional policies and negative representation in the media that construct a 'hate environment' (Ameli & Merali, 2015). Overall, one could state that the increase in anti-terrorism laws incited a ubiquitous fear of Muslims as it created a security category out of religion (Bayrakli & Hafez, 2017). The refugee crisis also impacted Germany, as Merkel 'wir schaffen das' rhetoric on the one hand (Barker, 2017), and rising anti-refugee sentiments on the other hand, signifying discrepancies between parliamentary and extra-parliamentary politics. Although, right-wing Alternative für Deutschland (AfD) gained more and more support after the first refugees entered Germany. Earlier however, German sociologist D. Pollack revealed that Germans overall maintain more intolerant stances towards Islam than the Dutch, French and Danish population even before the influx of refugees (Pollack, 2013). The very essence of racialisation of Muslims and legitimisation of Islamophobic discourse seem to have found momentum in Germany. Historically, Germany has economically and politically dominated Europe, which brought a 'native hegemonic culture' and point of reference for gender issues, class discrimination, and racial categories. Islamophobic discourse is embodied by hostile attitudes and the creation of Pegida, but also by the lack of responsibility taken by society as a whole to tackle this phenomenon. Pegida discourse has two main arms, say the positive expression and propagation of Judeo-Christian values that denigrates Muslims at the same time, and the victimisation of Germans due to socio-economic downturn and welfare state arguments. Pegida – based in Dresden - characterizes Germany's inconsistent Islamophobic field as right-extremism is primarily to be observed in the East. Moreover, federal states deal with Islam differently, and even public institutions as schools gather power to decide on headscarf issues. This spatial imbalance between the nature and degree of Islamophobic discourse, and the implemented measures to repulse Muslim-hate makes it a complicated task to develop a national profile on the subject-matter. However, approximately half of all Germans have anti-Muslim sentiments (Bayrakli & Hafez, 2017), for which two national incidents attributed, namely the numeral sexual attacks during New Year's celebrations and the attack on the Christmas market in Berlin killing twelve people. Geert Wilders responded on Twitter by posting a picture of Merkel with blood on her hands, arguing that Merkel's liberal stance towards refugees backfired tremendously. Numbers of right-wing marches - oftentimes offshoots of Pegida - have increased afterwards and with it violent assaults directed at asylum shelters and Islamic prayer houses.

Anti-Islamophobia discourse can be seen as the left side, starting point of a horizontal spectrum, hypothetically in institutional terms. This because all four selected countries has signed the ICERD, which states that all signatories must do everything in their power "to prohibit and to eliminate racial discrimination in all its forms and to guarantee the right of everyone, without distinction as to race, colour, or national or ethnic origin, to equality before the law, notably in the enjoyment of the [...] right to freedom of thought, conscience and religion" (ICERD, 1965). Unfounded hostility, unfair discrimination and the exclusion of European Muslims from mainstream political and social affairs are characteristics that point to societies' incapability to incorporate 'the distinct' in their social structures. "The maturity of a society is measured by its capacity to recognize the plurality of ways in which one can conceive of existence and open the way to greater freedom in adhering to, changing or rejecting any religious affiliation" (Lathion, 2015, p. 138). So, Islamophobia is a phenomenon that deserves public attention from all three actor categories.

### Contextualisation: defining the four playing fields

Formal institutions explicate the complex relation between integration and political priorities. Institutional opportunity structures can be constraining barriers aiming at discouraging or sanctioning certain behaviour, but also open up possibilities either by weak institutional spots or tolerating and rewarding particular practices. However, herein lies a problematic contradiction between political-legal and socio-cultural reasoning. Liberal states attempt to shape civic-cultural identifications of

migrants, and not so much religious ones as secularism grants religious minorities freedom of religion. This leads M. S. Berger (2013) to state that the cultural-religious dimension dominates political debates concerning integration policies and that "enshrining cultural values as law may confirm European cultural identities, but denies the values embedded in the European political-legal framework" (Berger, 2013, p. 136). This is highlighted by the stance that "Muslims' integration is considered a challenge constructed as a confrontation between religious discourses and secular spaces" (Ajala, 2012, p. 48). It becomes even more complex as governmentality through discourse that creates subjectivity and operates as an almost unidentifiable informal force. A discourse's objects, enunciative modalities, concepts and strategies are formations that signify a discourse's strength, scope and position vis-à-vis every single discursive intervention. Differences within states as to distinct groups could be faced by "[t]wo opposing and archetypical 'solutions' of governing diversity [namely] a solution can be sought in explicitly differentiating and distinguish groups on the basis of some perceived characteristics. Here diversity is 'solved' by the systematic maintenance of differences in society. On the opposite side we find a solution in the form of pure assimilation that defines the polity as an indivisible mass" (Koomen et al., 2013, p. 200). It is however, the mixture of both extremes that determines the overall integration policy at first, as thereafter religious accommodation policy follows. It is the formulation of either 'explicitly differentiating' or 'polity as an indivisible mass' that influences the debate from scratch. Explicitly differentiating not solely categorises – as first step of prejudice (Zick et al., 2011) - but also distinguishes societal groups so that the 'start product' and perceived 'finished product' are known. The relation between distinguishing and categorising societal groups creates a discursive repertoire that differs cross-nationally as well for religious accommodation as for counteracting Islamophobic tropes. As relations between states and religious communities are defined by both, the separation of politics and religion and the cooperation between political and religious authorities (Cesari, 2014), it is primarily the bottom-up process of Muslims organisations that is underexplored. The four playing fields forasmuch counteracting institutional and discursive Islamophobia and public contestation about Islamic religious practices – as defined by the 'gap' between institutions and national debates - are set out below by means of a spectrum. Both ends -Islamophobia and 'controversial' religious practices – are placed in a hierarchical fashion and are based on respectively the European Islam Reports of 2015 and 2016 (Bayrakli & Hafez, 2016, 2017) and the EURISLAM project (Tillie et al., 2013).

# Table 2: Four defined spectrums

France					
Housing market (ghettoization)					
Labour market					
Essence of <i>laïcité</i>					
Muslims' objectification (instead of subjectification)	Islamic (state) schools				
Muslim women with headscarf	Headscarves for students				
Islam as religious extremism (Deltombe, 2013)	Separate burial sites				
Satire	Burial without coffin				
Islamophobia	'Controversial' religious practices				
The Netherlands					
Populist PVV rhetoric and extra-parliamentary mobilisation					
Mosque vandalism					
Labour market	Islamic (state) schools				
Islamic 'racial' profiling by police forces	Headscarves for students				
Unbounded social media usage (Herbert, 2013)	Headscarves for teachers				
Islamophobia	'Controversial' religious practices				

The United Kingdom				
Securitisation / Islamic 'racial' profiling by police forces				
Labour market				
Face veils for women				
Social media platforms and lack of scrutiny	Headscarves for students			
Muslims as socio-economic burden	Islamic (state) schools			
Islamophobic discourse in media and education	Purpose-built mosques with minarets			
Islamophobia	'Controversial' religious practices			
Germany				
Muslim women with headscarves				
'Dumbing down Germany' (Sarrazin, 2011)				
AfD induced marches (Grabow, 2016)				
Labour market				
Negative portrayals of Muslims in schoolbooks	Islamic religious classes in state schools			
Sexualisation	Headscarves for teachers			
Islamic 'racial' profiling by police forces	Purpose-built mosques with minarets			
Satire	Headscarves for students			
Islamophobia	'Controversial' religious practices			

The main theoretical insight is that the discursive opportunity structure – fuelled by exogenous factors for social movements, say institutional provisions and structures, political agendas, events and timing, national symbols and culture, and media structure (Motta, 2015) – determine actors' perceptions of that what can be said and written in a particular space and time. First, the *conditio sine qua non* for statements to diffuse is getting visible, preferably by mass media channels. Consequently, the accumulation of all visible claims – fed by resonance – provides sensible discourses. From here, the four exogenous factors have explanatory value, although "the importance of distinguishing public debates concerning religious rights from other issues [such as] the impact of dramatic and violent events" (Vanparys et al., 2013, p. 224) must be kept in mind. The institutional opportunity structure provides formal pillars and points of reference for both ends of the spectrum, Islamic religious practices and anti-Islamophobia discourse. The same holds for the media structure, in which controversy and discontent on both matters resonate. However, timing and the political agenda seem to trigger Islamophobia discursively more so than debates on Islamic religious practices (see Appendix 2 on p. 120). National symbols and culture on the other hand must be considered as main provider or obstacle of opportunities discursively when it comes to Islamic religious practices.

# 3. Methods

a. Research design

The internal logic, rationale, reasoning or set of ideas by which a research project proceeds in finding an answer to a particular question or problem is the pivot of the research design (Punch, 2000). This search deals with multiple types of data. Fundamentally, data from the EURISLAM project on media content provide quantitative data and so enables for comparisons. The guiding research question is:

# What are discursive structures and how do they function in the context of Islamic religious practices and anti-Islamophobia discourse for Muslim minorities residing in West secular Europe?

The conceptual framework around the main theory 'discursive opportunity structure' is set out in the theoretical framework, putting emphasis on the essence of the visibility of discourse through claims in the public realm. Moreover, the two ends of the spectrum - Islamic religious practices and anti-Islamophobia – are conceptualised and put in perspective for the countries under scrutiny. Forasmuch the discursive playing field in which all three actor categories find themselves, I rely on categorisations, classifications and codes used by the consortium of six European research teams for the EURISLAM project (Cinalli & Giugni, 2013). This search proceeds from a minimal theoretical framework and therefore possesses unfolding qualities. Moreover, this research's profile can be labelled as a 'deductively applied research of discursive opportunity structure theory', although it also stresses the essence of more inductive strategies in this research field for shaping and modifying theory, but also bridging institutional structures and framing practices. Social research simply aims to gather knowledge and insights into specific phenomena, but also strives to bridge finalised projects with new starting points or hypotheses. There is no causal proposition as starting point, as the theory of discursive opportunity structure is not yet fully developed as it can be considered as a minimal theoretical model. Overall, discursive structures must be widely embraced as promising but not yet incontestable explanatory tool. In other words, applying the theoretical pivot of visible claims to my selected cases might bring feedback effects on theorising as it is not likely that all elements of a case can be nomologically explained. What we do have are the institutional contexts, but the bridge between institutional structures and discursive ones are ambiguous, irrespective of formalities as points of reference. In other words, the panoramic overview of the discursive contexts in each country cannot be studied without elaborating on the institutions. For this search however, discursive contexts must be considered as the independent variables, in which Islamic religious group rights and anti-Islamophobic discourse embody the ends of the same discursive spectrum. Those institutional contexts are already set out in Appendix I (on p. 106) by means of citizenship policy and church-state regimes.

# **Conceptualisations**

Overall, research designs are based on research questions and therefore choices on what to measure and what not. This means that clear demarcations of the main concepts must accord in the most ideal way with data on the four discursive playing fields. It is a comparative case study, or small-N cross case analysis. It avoids any form of conceptual stretching, but rather aims to understand the patterns within and between countries as suitable cases (Sartori, 1970). Therefore the following conceptualisations of the guiding concepts are proposed:

Discursive opportunity structures are the "aspects of the public discourse that determine a message's chances of diffusion in the public sphere" (Koopmans & Muis, 2009, p. 648; Koopmans & Olzak, 2004, p. 204; Koopmans & Statham, 1999, p. 202).

Group demands for Islamic religious practices, are "claims by migrants for group-specific rights, recognition, and exemptions from duties, with respect to the cultural requirements of citizenship in their societies of settlement" (Statham et al., 2005, p. 430).

A claim-making act "is a purposeful communicative action in the public sphere. Claim-making acts consist of public speech acts that articulate political demands, calls to action, proposals, or criticisms, which, actually or potentially, affect the interests or integrity of the claimants or other collective actors" (Koopmans & Statham, 2010, p. 55; Statham, 2016, p. 222). Such an intervention "is characterized by a typical structure, which can be broken down into six main elements inquiring into the main attributes of a claim" (Cinalli & Giugni, 2013, p. 133) to wit the claimant, the form, the addressee, the content, the object and the frame.

Islamophobia refers to the "unfounded hostility towards Islam. It refers also to the practical consequences of such hostility in unfair discrimination against Muslim individuals and communities, and to the exclusion of Muslims from mainstream political and social affairs" (RunnymedeTrustReport, 1997, p. 4)<sup>16</sup>.

# Strategic considerations

In order to answer to overall research question in a systemic way, two sub-questions are proposed:

1. What are discursive opportunity structures and which can be observed for Muslim minorities in West secular Europe?

2. How can we define Muslim minorities' discursive playing field with regard to group demands for Islamic religious practices and counteracting Islamophobia in West secular Europe?<sup>17</sup>

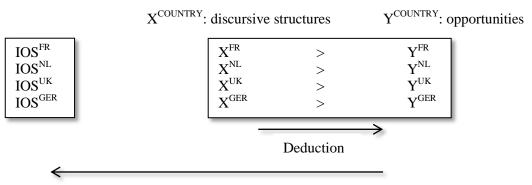
West secular Europe refers to France, the Netherlands, the United Kingdom and Germany. Scientific canons include primarily the following pillars; significance of findings, theory-observation compatibility, generalisability, consistency, reproducibility, verification, and precision and validity concerns (Corbin & Strauss, 1990). This study - through its exploratory nature and explanatory elements - has not simply a positivistic character, as lines of reasoning and arguments are foundational but do not function as starting point. Nor has it a static character as discourses as social phenomena are dynamic and change over time, while we deal with three actor categories at the same time in four different settings, meaning that a rather pragmatic research philosophy is required. Also strict determinism must be avoided, as such philosophical stances usually "describe an argument or methodology that simplistically reduces causality to a single set of factors acting more or less directly to produce outcomes" (Lewis-Beck, Bryman, & Liao, 2003, p. 256), which hinders exploration. Such studies have merits and inherent problems. The selected cases, as argued below, are idiosyncratic and therefore not suitable for generalising conclusions, although certain patterns might be informative. The promising feature of small-N cross case analyses is that it provides for intense scrutiny and thus aims to fully understand a specific phenomenon rather than to produce generalising inferences. The main frailty is the 'many variables, few cases' problem; a small-N of cases could possibly undermine the importance of specific variables while at the same time lurking variables might take the centre stage. It is therefore to the utmost extent important to be reminded of the specifically of the selected cases and so any inference on external validity must be made with profound caution (Collier, 1993; Liphart, 1971). Besides theoretical motivations, I limited myself to the four picked states based on the scarcity of time, assignment's description and availability of data. Moreover, these countries have been scrutinised earlier and embody comparative cases due to various reasons. First, all four countries have a public space and decent Muslim population with different dynamics and compositions respectively. Second, as data from the EURISLAM - work package II on media content - is foundational and leading, I rely on the written media, that is, the five most prominent newspapers in the four countries for the period from 1999 till 2008 (see Tillie et al., 2013, pp. 21-25). Third, discursive opportunity structure theory can be considered as a promising but parsimonious theory until the present day. It is exactly therefore that – unlike reducing the number of variables in conjunction with using stronger theory - the panoramic overview and visibility of claims suffices.

<sup>&</sup>lt;sup>16</sup> For Islamophobia, we need to make a distinction between behavioural and attitudinal forms (Ciftci, 2012).

<sup>&</sup>lt;sup>17</sup> Do we observe – besides institutional differences – different discursive playing fields in France, the Netherlands, the United Kingdom and Germany?

Based on deductively reasoning and the academic literature, four different discursive playing fields are expected. Whereas the power relations that precede institutions and institutional structures are set out in the Appendix. This set up has similar intends of that of institutional ethnographies. As Hammersley (2005) states, patterns of social behaviour must be explained in "terms of the needs that any individual or society must meet [and therefore the] differences in orientation not only between societies but also within them [that is] cultural interpretations that inform patterns of action" (Hammersley, 2005, p. 5). It aims to better understand the interplay between attitudes and behaviour of the host society population and attitudes and behaviour of Muslims that find themselves in the same discursive arena, but have different perceptions (Tillie et al., 2013). Overall, Muslim minorities in France, the Netherlands, the United Kingdom and Germany are subjected to different structures and therefore different opportunities and constraints. This research is guided by a clear research question and conceptual framework. However, discursive opportunity structure is a not vet fully developed theory and also the absence of numerous pre-coded data implies some room for unfolding too. Therefore, some inductive steps are proposed to observe cross-national differences in the discursive and perceptive realm, so that patterns vis-à-vis institutional determinants can be explained. Essentially, in variable terms, my search can be schematised as follows:

#### Figure 4: Research design



#### Induction

The focus lies on opportunities for Muslim minorities. The observed opportunities consequently provide feedback as to cross-national discursive structural differences. One might consider this approach as a reversed most different systems design or Mills' 'direct method of difference'. The main independent variable is the presence of discursive realm that is open for similar actor categories across the four countries. Other variables, such as institutional determinants (e.g., type of secularism or social mobilising capacity), majority-minority divisions and selectivity of mass media are of interest too. It suffices here to say that analysing discursive opportunities indicate either promising structures or constraints in the public realm for Muslim minorities. Some steps of the Grounded Theory Method must be considered, even while theory building is way beyond the scope of this search. This search looks how discrepancies on the micro-or individual level (non-Muslim majority and Muslim minorities), meso-level of organised collective actors (policy-makers and representative Muslim organisations) and macro-structural level (institutional and discursive structures) differentiate. Such patterns help to hypothesise how discursive structures provide opportunities for Muslim minorities when it comes to Islamic religious group demands and anti-Islamophobic discourse.

The inductive character on the one hand and the comparative tenet on the other imply that not just data must be interpreted and made sensible, but also the pragmatic perceptions of all three actor categories. Essentially, patterns within and across the four countries are of interest and provide information by "[i]ntegrating categories and their properties" (Babbie, 2015, p. 392). Here I rely on the political claims analysis, which has been used "to identify the 'multi-organizational field' of relevant actors, [...], to analyse the distribution of claims between these organizational types and compare them within or between polities, to map frames and actors on a one-dimensional scale, depending on how many claims actors make in favour of the contentious issue or against it, to identify brokers who are located in the middle of this pro/contra scale, to assess the degree of polarisation between frames and/or claimants on the one-dimensional scale, to count the relative frequencies of certain frames

among all claims in order to measure the relative importance of certain subtopics" (Leifeld & Haunss, 2010, p. 6). The political claims analysis suits, as it provides the panoramic overview of claims' properties and therefore the discourse. In sum, a panoramic overview through visibility by claim-making elements can be considered as the operationalisation of discourse.

Discourse, here as that what can be said and thought of in a particular space and time, is considered as the accumulation of visible claims. The patterns between the claims' properties are highly relevant here, also in relation to institutional structures that emotionally<sup>18</sup> and rationally undergird the public debates. As highlighted in the theoretical section, discursive opportunity structure centres on the main concept of visibility, which stems from and brings resonance in different forms – say dissonance and consonance – based on perceived legitimacy of a claim's properties. If we understand this concept of 'perception', both emotionally and rationally, in relation to the discursive playing field, we also might find ways to alter this discourse. Found patterns in available data contributes to better understand discursive opportunity structure, especially in relation to the way it functions in the context of Islamic religious practices and anti-Islamophobia discourse for Muslim minorities residing in West secular Europe. This research brings scientific and practical utilities, but also generates more questions. Essentially new hypotheses must be constructed that are not entirely disentangled from the produced academic literature on the theory so far, but theory modification starts with suspiciousness as to the essence of causal explanations of a specific variable, ideally backed by empirics.

#### b. Case selection

This study aims to elaborate on the triangle relationship between West European secular states, their national predominantly non-Muslim majorities and Muslim minorities. The focus on Islam and Muslims follows from the absence of an easy blueprint for politically and culturally accommodating Islam (Statham et al., 2005). In doing so, four countries are selected, to wit, France, the Netherlands, the United Kingdom and Germany. These countries institutionalised distinct assimilation models, church- state regimes and so deal differently with granting Islamic religious practices to Muslim minorities in their respective countries. Different forms of secularism and corresponding institutional structures bring about different milieus that "impose certain constraints on political activity or open avenues for it. The manner in which individuals and groups in the political system behave, then, is not simply a function of the resources they command, but of the openings, weak spots, barriers, and resources of the political system itself" (Eisinger, 1973, pp. 11-12). Besides, those countries, although with different ethnic compositions, have the most sizeable Muslim populations with an immigrant origin in Western Europe (Buijs & Rath, 2003), which are likely to grow in the future (Hackett et al., 2015). Institutional opportunity structure is not central to my argument but certainly influences discursive opportunities, and thus must be considered as contextual foundation. Moreover, these four countries have been analysed as part of the EURISLAM project for the very reason that those countries are populated by many Muslims that subjected to different religious accommodations. Therefore, this study concerns a small-N cross case analysis, with best cases. Second, by focusing on group demands and combatting Islamophobia, two non-mutual exclusive but extremes concerning non-Muslim majorities' positions towards them, enable us to gather a more profound understanding of the rationalisation and emotionalisation of Muslim minorities on both matters, their prioritisation, resource mobilisation and collective action possibilities (Maussen, 2005).

For group demands on Islamic religious rights, thirteen practices are of interests based on controversy. Different patterns are expected, especially concerning the religious practices within public institutions. Those thirteen contested religious practices can be considered as diverse, but crucial cases; as individual cases could embody an either exploratory or confirmatory function (Seawright & Gerring, 2008). As to counteracting Islamophobia and the essence thereof, the European Islamophobia Reports from 2015 and 2016 are observed. Such reports are helpful in qualitatively determining what Islamophobia practically entails, in which situations, institutions and forms this phenomenon occurs in West secular Europe. Based on the European Islamophobia Reports, a list of fifteen controversial forms – and therefore crucial cases – is constructed. These two ends of the

<sup>&</sup>lt;sup>18</sup> 'Priming' (see Moy, Tewksbury, & Rinke, 2016)

spectrum – issues of Islamic religious practices and Islamophobic controversies – embody the framework, that is, these two sets of issues are embedded in the two leading concepts that are subjected to discursive structures. As Katherine Pratt Ewing (2015) states, material objects, practices and categories are "the key symbols of cultural difference in controversies about the place of Muslims as minorities within Europe" (Ewing, 2015, p. 202). The issues listed below entail some sort of cultural difference or controversy as to visible material objects, actual practices and categorisation.

Table 3: Selection of frames forasmuch Islamic religious practices and forms of Islamophobia<sup>19</sup>

Issues of Islamic religious practices	Issues of Islamophobic controversies
Islamic religious practices outside public institutions	Discrimination in the housing market
Ritual slaughter	Discrimination on the labour market
Islamic call for prayer	Essence of secularism
Purpose-built mosques with minarets	Muslims' objectification instead of subjectification
Separate cemeteries or special burial sites	Controversy around women with headscarves
Burial without coffin	Islam as religious extremism
Islamic religious practices inside public institutions	Satire
Islamic (state) schools	Populist rhetoric, extra-parliamentary mobilisation and marches
Islamic religious classes in state schools	Mosque vandalism
State funding Islamic schools	Islamic 'racial' profiling by police forces
Imams in military	Unbounded social media usage and lack of scrutiny
Headscarf for students	Muslims as socio-economic burden
Headscarf for teachers	Negative portrayals in schoolbooks and media
Islamic religious programs in public broadcasting	Sexualisation
Imams in prisons	Islam and securitisation

It is to the utmost extent important to delimit and demarcate the discourses of interest, for both scientific and practical reasons. Scientifically, explicating what idiosyncratic discursive dimensions and fields are studied contributes to coherence and validity. Practically, it brings a narrowed focus on a subject-matter that arguably easily merges into overlapping themes. This is to say that a very maximalist definition of Islamophobia easily shades into debates on Islamic religious practices. It is exactly therefore unsurprising that the key themes for both ends of the spectrum accord academically and practically. That is, the key themes between academic attention on headscarf controversies, Islam and education, mosque-building on the one side, and the main dimensions of Islamophobia discussed in the EIRs of 2015 and 2016 overlap with the labels used for the media content analysis of the EURISLAM project. For the case selection, I limited myself to prevent conceptual stretching but included enough cases so that useful variation on the dimensions of theoretical interest could be observed (Seawright & Gerring, 2008). My search furthermore relies on secondary data generated by work package III on 'cultural distance' to put the two discourses of interest in perspective, and thus some clarification on its sampling procedure is in place. "The process of selecting observations is called sampling" (Babbie, 2015, p. 124). For this research field, a nonprobability, say purposive or judgemental sampling technique<sup>20</sup> was used. The objective was to select at least a minimum number of 150 Muslims of each ethnic minority group, when it concerned a sizeable Muslim ethnic family group. the target shifted to 250 respondents. As the four countries have different configurations concerning Muslim migrants, the selection of respondents differ too.

<sup>&</sup>lt;sup>19</sup> For the issues of Islamic religious practices EURISLAM's list is used. These Islamic religious practices – especially those inside public institutions – have been subjected to a lot academic attention in the light of separation of church and state. With regard to Islamophobic phenomena, a selection is made based on the European Islamophobia Reports of 2015 and 2015, that highlight the main characteristics and spheres in which this phenomenon occurs (Bayrakli & Hafez, 2016, 2017). <sup>20</sup> Surname-based sampling

		Native origin	Yugoslavian	Turkish	Moroccan	Pakistani	Total
France	Count	385	150	250	250	150	1185
	% within host country	32,5%	12,7%	21,1%	21,1%	12,7%	100%
The Netherlands	Count	385	151	250	250	152	1188
	% within host country	32,4%	12,7%	21,0%	21,0%	12,8%	100%
The United Kingdom	Count	385	200	350	200	350	1485
	% within host country	25,9%	13,5%	23,6%	13,5%	23,6%	100%
Germany	Count	390	255	355	256	162	1418
	% within host country	27,5%	18,0%	25,0%	18,1%	11,4%	100%
Total	Count	1545	756	1205	956	814	5276
	% within host country	29,3%	14,3%	22,8%	18,1%	15,4%	100%

(Hoksbergen & Tillie, 2016, p. 11)

Table 4: Sample composition of work package III on 'cultural distance'21

#### c. Data collection

"Social science scholarship on Muslims and Islam is situated in a field already densely occupied by competing public representations of Muslims and Islam. These range from Islamist representations at one pole to expressly anti-Islamic and anti-Muslim representations at the other, with many others in between" (Brubaker, 2013, p. 6). This excerpt summarises the main methodological concern academics face when scrutinising 'cultural distance' between Muslims and non-Muslims in institutional contexts. This has implications for methodological choices, but also for practicalities. This can be highlighted in two ways. First, the generalising tendencies, i.e., 'the Muslim', 'Muslims' or 'Islam' an sich, could be empirically observed in the media. The same holds for Islamophobia, it creates differences and 'the Other', while at the same time erases differences in that 'all of them are the same' (Kaya, 2014). Second, the institutional context and established communication channels do not necessarily fulfil or comply with Muslim minorities' accessories (see Appendix 9a, 9b, 9c, 9d on pp. 132-133) and are therefore somewhat biased. This is highlighted by Brubaker's concern on the traffic between units of analysis and units of practice (Brubaker, 2013). Therefore, I stress the need for more inductive and ethnographic research and Grounded Theory Methodological approaches in this research field. In the same fashion, the discussion on whether to label Islam as religion or culture has profound legal, political and thus top-down practical relevance. But likewise, contestation about Islamic religious practices and Islamophobic phenomena has bottom-up dynamics. It is however, the horizontal relationship between Muslim minorities and the non-Muslim majority, which is mediated by the state as arbitrary. The units of observation are the four different discursive playing fields for Muslim minorities that might provide opportunities, with a special focus on Islamic religious practices and counteracting Islamophobia. The units of analysis are the discursive elements that construct instances of claim-making within the public sphere. This project uses secondary quantitative data retrieved from the integrated report on media content as part of the EURISLAM project. The dataset is composed of numerous variables perceived to be important in analysing contestation in the public sphere, ranging from naturalisation and citizenship to discrimination in health and welfare services. The EURISLAM was a European Commission-funded research program that lasted from February 2009 till August 2012 and executed by several research institutions<sup>22</sup> all responsible for a specific research field<sup>23</sup>. Furthermore, data retrieved from all six research fields have been used for numerous other studies. In analysing discourses, the political claim analysis fulfils three important perspectives, namely actors' centeredness, content orientations, and formalisation (Leifeld & Haunss, 2010). It however, fails to enable analyses of deep structures. To see what can be claimed and stated within a particular space and time, claims with a political nature - as units of analysis - can be considered as useful. Claims, as strategic action in the public sphere, must affect interests. That is, an instance of claim-making must result from purposive strategic action of the claim-maker, and be political nature; they have to relate to collective social problems. Claims were "coded by random sampling 750 articles

<sup>&</sup>lt;sup>21</sup> The minimum of "385 members of the national majority group (predominantly non-Muslims)" (Hoksbergen & Tillie, 2016, p. 11) serves as parameter.

<sup>&</sup>lt;sup>22</sup> Partners: University of Amsterdam (IMES: Institute for Migration and Ethnic Studies); WZB (Wissenschaftszentrum Berlin für Sozialforschung: Department Migration, Integration, Transnationalization); The University of Bristol (Ethnicity and Citizenship Centre); Université Libre de Bruxelles (GERME: Institut de Sociologie); Université de Genève: RESOP (Laboratoire de recherches sociales et politiques appliquées); Fondation Nationale des Sciences Politiques: CEVIPOF (Centre de Recherches Politiques de Sciences Po)

<sup>&</sup>lt;sup>23</sup> RF1 'legislation and jurisprudence'; RF2 'identity conceptions'; RF3 'cultural distance'; RF4 'cross-national socio-cultural variables'; RF5 'transnational families'; and RF6 'representatives Muslim organisations'

selected from five newspapers in each country and covering the period from 1999 to 2008" (Tillie et al., 2013, p. 111). To increase the representative of the sample, say the matrix of claims for a specific country, five newspapers were selected for each country. Data is collected from the five most prominent newspapers in the four countries for the period from 1999 till 2008<sup>24</sup>.

Table 5: The five most prominent and observed newspapers per country

France	The Netherlands	The United Kingdom	Germany
Libération	De Volkskrant	Daily Mail	Bild
Le Figaro	Trouw	Daily Mirror	Süddeutsche Zeitung
Le Monde	NRC Handelsblad	The Guardian	Frankfurter Allgemeine Zeitung
La Croix	De Telegraaf	The Sun	Welt
Le Point	Het Parool	The Times	Tagesspiegel

(M. Giugni & Banfi, 2011, p. 5)

Articles were samples based on the following keywords:

# Islam\* / Muslim\* / Moslem\* / Mosque / Imam / Qur'an (Quran, Qur'ān, Koran, Alcoran or Al-Qur'ān) / Headscarf / Burqa (Burkha, Burka or Burqua) / Minaret

"[A] claim must either be made in one of our countries of coding or be addressed at an actor or institution in one of our countries of coding" (M. Giugni, 2012, p. 6), that is, the realisation of the claim is conditional on the country of coding. With regard to the frames, say group demands for Islamic religious practices and counteracting Islamophobia, one must bear in mind that I fully rely on the coded claims. My two sub-questions depend on different types of data, as is set out below.

# 1. What are discursive opportunity structures and which can be observed for Muslim minorities in West secular Europe?

This conceptual and descriptive question relies primarily on literature review on discursive opportunity structure theory, which emphasises the hegemonic discourse through the visibility of statements. A comparative overview of claim-making elements procures the main dynamics of public debates forasmuch Islam and Muslim minorities in the four selected countries. This sub-question depends on secondary data, issued by the EURISLAM project. Work package II – say, research field *'Identity Conceptions'* by a media content analysis – provides a comparative overview of discursive elements.

# 2. How can we define Muslim minorities' discursive playing field with regard to group demands for Islamic religious practices and counteracting Islamophobia in West secular Europe?

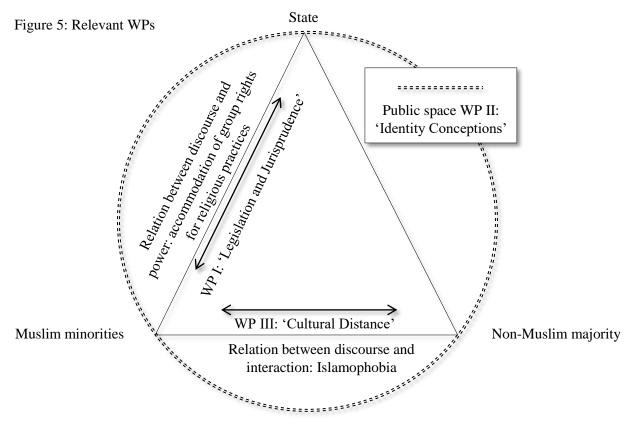
In other words, do we observe – besides institutional differences<sup>25</sup> – different discursive playing fields in France, the Netherlands, the United Kingdom and Germany? This descriptive question builds on the former and relies somewhat more on solid lines of argumentation. The playing field is defined by both, institutional and discursive structures. I argue that institutions and formalities as to Islamic religious practices and counteracting Islamophobia must be seen as points of reference. That is for instance, different regulations as to headscarves bring different public debates (Saharso, 2007; Statham, 2016). This search highly relies on quantitative survey data collected for the EURISLAM project; also work package III on 'cultural distance'<sup>26</sup> indicates the complications as to religious or cultural conceptualisations of practices. I have to note that 'cultural distance' here embodies an anthropological conceptualisation of culture; "[a]nthropological concepts of culture [...] view all

<sup>&</sup>lt;sup>24</sup> WP II is gathered through mail correspondence with M. Giugni and J. Tillie who sent me the data in sav. format

<sup>&</sup>lt;sup>25</sup> Considering institutional structures as baseline, aggregated secondary data from the EURISLAM project work package I on 'legislation and jurisprudence' is used (see Appendix 1 on p. 106).

<sup>&</sup>lt;sup>26</sup> Retrieved from <u>https://easy.dans.knaw.nl/ui/datasets/id/easy-dataset:62447/tab/2</u>

human activities including religion as cultural" (Ewing, 2015, p. 203). Huntington's thesis on the clash of civilizations (Huntington, 1993) is accepted insofar that conflicts emerge within states not just along political and ideological lines.



d. Data analysis methods

The elements of political claim analysis are central forasmuch the discursive playing fields. Essentially, the actors, forms, addressees, topic and overall tone of claims provide necessary indictors. The relation between those necessary indicators, the visibility of discourse in the public realm and the perceptions thereof is analysed through various strategies. First, the relation between institutional structures (two main indicators: a) position of national majorities towards immigrants' undermining host country' cultural life and the extent to which immigrants maintain distinct customs and traditions (especially man-woman relations seem to be a gap) b) the extent to which distinct Muslims minorities - in the four countries – agree with the separation of church and state and thus the role of religion in society) and public discourse for which a political claims analysis suits for the main differences when it comes to discursive elements. Quantitative data requires quantitative analysis techniques as it involves numerical data that represents "observations for the purpose of describing and explaining the phenomena that those observations reflect" (Babbie, 2015, p. 414). Subgroup comparisons are useful when "it is appropriate to describe subsets of cases, subjects, or respondents" (Ibid., p. 426). For instance, different ethnic groups could be compared next to respondents' host country to uncover patterns. Quantitative data can be analysed through various statistical tests, to wit ANOVA, Chi-Square test, and also the Marascuillo procedure to make sensible inferences.

In methodological terms, this study can be labelled as *media discourse analysis on 'political claims' concerning the place of Islam in Europe.* 'The place of Islam in Europe' is here considered as the protection and accommodation of Islam. Discursive opportunity structure is taken as hold. Dominant discourses show how reality has been socially constructed; "[d]iscourses are the sets of meanings which constitute objects" (Parker, 1992, p. 4). The challenge is to explore that what can be said and written in a particular space and time, that what is actually said and written in a particular space and time, the purpose of this search profits by analysing diffused political claims in the public sphere. The

"political claims analysis (PCA) [...] tries to establish the missing link between actors and contents in a discourse by employing a distinct set of methods, particularly a classification of actors as well as frames on a one-dimensional pro/contra scale" (Leifeld & Haunss, 2010, p. 5). It can be used to "trace the shifting alliances and oppositions between actors that evolve in the dynamic process of a political conflict" (Koopmans & Statham, 1999, p. 6), but also to uncover around which issues such conflicts persist. In order to make a sensible dataset, political claims are oftentimes collected from newspaper articles, simply because they are easily accessible, have great potential to diffuse and thus trigger response. From there, coding a claim – as unit of analysis – provides a matrix of variables of which the claimant, the form, the addressee, the topic, the object actor, and the frame must be considered as the six main discursive elements of interest.

PCA as method can be applied in order to identify the main claimants in a multi-organisational field and how they relate to one another. Furthermore, PCAs provide panoramic overviews of statements on a particular subject matter, which enables for comparisons between polities. Contentious issues oftentimes provoke political claims so that a particular political direction is advocated. In doing so, a claim is framed in a strategic way; a frame is an "interpretive [schema] that simplifies and condenses the 'world out there' by selectively punctuating and encoding objects, situations, events, experiences, and sequences of actions within one's present or past environment" (Snow & Benford, 1992, p. 137). In simple terms, claimants' interpretations that undergird their argumentations can be considered as frames. A PCA is suitable for observing framing trends and actors' position towards the contentious issue. Moreover patterns can be observed on a 'pro/contra scale', that is, what claimant category seem to be rather negative or positive on the contested issue. Overall, the number of claims suggests the relative importance of particular sub-issues. Lastly, a PCA can be applied in longitudinal studies to analyse public contestation over time. Political claims analysis thus provides a reasonable methodology to examine both actors and their frames using a single dataset, and to analyse the connections between these two classes.

#### How to do a media discourse analysis on 'political claims'

According to Foucault's notion of discourse, it is essential to look for straightforward and hidden power-relations since political discourse is embedded in power relations and claims have a political nature. Similarly, Said (1983) emphasises the essence of relating "discourse to a greater network of power-relations [such as] institutions, agencies, classes, academies, corporations, groups, ideologically defined parties and professions" (as cited in Hook, 2007, p. 19; Said, 1983, p. 219). In doing so, identifying those who exercise power via presenting their discursive standpoints is important. This can be done by means of a political claim analysis, with a specific focus on the six components of a discursive intervention. Discourse, as put forward earlier, is that what can be said and thought of in a particular space and time. This implies that the actualisation of a discourse is explicitly embodied by the claim-maker, the form or way in which the claim-maker constructs its message, the addressed party or parties, the actual message's content, the object and frames of the claim. The claim – as unit – is the product of six components or discursive formations.

CO	Components of a discursive intervention								
	Who?	How?	At whom?	What?	For/Against whom?	Why?			
	Claimant	Form	Addressee	Topic	Object actor	Frame			
		Sour	ce: (Berkhout	& Sudulic	ch, 2011, p. 5; Cinalli &	& Giugni, 20	013, p. 133)		

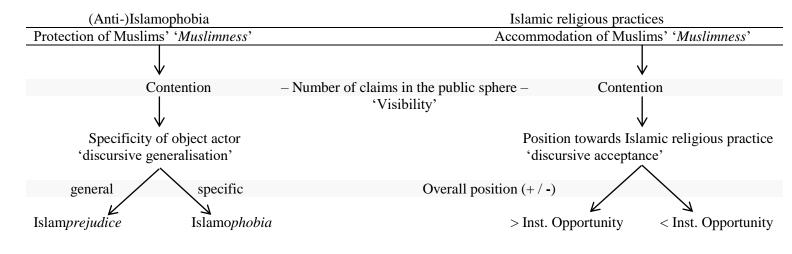
Table 6: Components of a discursive intervention

The typical structure of a discursive intervention or claim can be broken down into these six elements (Franzosi, 2004). Those six elements or properties of a claim provide insights as to chance of diffusion of a particular claim in the public sphere. But perhaps more importantly, these elements also showcase the reception and response to what is already said and thought of in a particular space and time. Essentially, the six components of discursive interventions must be considered as the fuel and must be analysed as the main dimensions of the produced discourse. Additionally, the six discursive elements must be categorised so that clear insights emerge as to what categories are dominant for each discursive element.

### Coding considerations for both frames

As that what can be said, written and thought of in a particular space and time in relation to the cultural interactions between Muslim minorities and receiving societies is interminable, delimitations are essential. The overall coding scheme for all six discursive elements can be found in the Appendix (see Appendix 3 on p. 121). Both frames – counteracting Islamophobia and accommodating Islamic religious practices – differ political-legally and cultural-religiously. Therefore, different discursive elements function differently for both sides of the interactive spectrum. First, visibility of a claim is a requisite for diffusion. From there, a contentious subject resonates and so generates more claims. From there, the focus changes for both sides due to the hypothetical essence of liberal, democratic and secular principles concerning Islamophobia and Islamic religious practices. This implies that rights for Islamic religious practices should be studied through the lenses of the general opinion – as indication of the discursive acceptance – on a particular Islamic practice relative to the institutional determinants. When it comes to forms of Islamophobia, the object-category becomes more important, pointing to the discursive relevance of a particular form of Islamophobia. In other words, are we talking about Islam*prejudice* or Islamo*phobia*?

Figure 6: Coding scheme for both frames



#### Table 7: Classifications per contested form for both frames

(Anti-)Islamophobia			Islamic religious practices
	Specificity of object actor ( $\Sigma$ )		Position towards Islamic religious practice (µ)
Specific	'minority/small group/particular group of Muslims'		
	'individual Muslims'	-1	'anti-Muslims/Islam/xenophobic/extreme right'
	'minority currents within Islam'		_
	'specific religious stream/movement within Islam'		
Generalising	'all Muslims in general'	0	'neutral/ambivalent'
	'majority/most Muslims'		
l	'Islam in general'		
	'Islam mainstream'	+1	'pro-Muslims/Islam/antiracist/anti-extreme right'
Unclassified	'no Muslim OBJECT frame'		
	'unclassifiable Muslims'		
	'unclassifiable Islam'	9	'unclassifiable'

Source: (M. Giugni, 2012)

#### Five steps to be taken to answer the research question

This paragraph contains a step-wise recapitulation of the made strategic choices. The theoretical chapter set out the conceptual foundation and main academic and practical controversies around which contestation exist on Islamic religious rights and Islamophobia. First, a comparative overview as to the main discursive elements provides sensible indications of that what can be said, thought of and written in a particular time and country. Such an overview provides insights regard the main claimants, the key themes and controversies, and eventually the differences that persist between countries. Such a comparative overview provides a partial answer to the first sub-question, that is, what discursive elements are foundational in exposing the different discursive playing fields? Second, the two frames of interest – (anti-)Islamophobia discourse and the accommodation of Islamic religious practices – will be scrutinised in relation to relevant dimensions which are set out in the previous chapter. In other words, claim-making and group demands on Islamic religious practices must be observed in relation to church-state regimes, in- or outside public institutions, nature of the right and the visible aspect. Islamophobia must be considered in the light of in- or outside public institutions, behavioural and attitudinal forms, but more importantly the specification of the object actor, that is, does the claim target an entire belief system, group, a particular denomination or individual? Third, two indicators are to the utmost extent important to assess the discursive playing fields, namely the amount of diffused claims on a particular issue that resonates as a matter of visibility and the overall position on that particular issue. A claim must be political in nature, so that they have to "relate to collective social problems and solutions to them, and not purely individual strategies of coping with them" (Guigni & Cinalli, 2010, p. 4). So a claim ideally pushes in some political direction that is either pro/accommodative or anti/restrictive. Overall, the discursive playing fields hypothetically differ due to differences within the four exogenous factors namely, institutional provisions and structures. political agendas, events and timing, national symbols and culture, and media structure. Fourth, making inferences on the differences and similarities regards the discursive trends on the accommodation and protection of Muslims' 'Muslimness' in France, the Netherlands, the United Kingdom and Germany. Considering the discursive arena as feedback mechanism and having distinguished two extremes, suggest the main insights concerning the 'Europeanisation of Islam'. The aim is to compare the discursive trends with the institutional determinants and eventually whether rooms for manoeuvre can be exposed. Fifth, having focused on and analysed the two discourses of interest, the findings must be interpreted and put in perspective. Other variables such as perceived cultural distance between Muslim minorities and non-Muslim majorities such as the opinion on the separation of church and state, and the perceived willingness of Muslims to maintain their own or adopt to host-countries' customs and traditions are complementary in understanding the interactional dynamics between both groups.

#### 4. Empirical analysis

a. Findings and observations

The theoretical framework highlights the most important dimensions of discursive structures, which provide or hedge windows of opportunity for specific actor categories. On the basis of those dimensions, the four selected countries will be assessed. In other words, the visibility – as product of resonance and legitimacy – and ultimately the perception of the national public discourse concerning Islamic religious practices and anti-Islamophobic stances are set out. This section starts with rather general or umbrella data before turning to a comparative overview of the six main dimensions of claim-making with a political nature directed at Muslims as actors or Islam as religion. Such an overview provides a raw indication of how public discourses vary across the four countries and consequently whether there are reasonable opportunities to intervene. The difficulty, however, is to provide clear and explicit demarcations between visibility, resonance and legitimacy. The mere quantitative indicators of public discourses about Muslims and Islam in Europe not just provide an overview of the main actors, forms, addressees, contents, objects and frames, but also generate perceptions of actor categories. Essentially we deal with a societal issue that brings together many actors in a multi-organisational field – in a neo-corporatist fashion (Laurence, 2009) – with different interests, mobilisation capacities, and thus discursive resources.

Based on data retrieved from the seventh round of the *European Social Survey* (ESS) (2014), a raw indication can be generated of receiving countries' nationals' position concerning the allowance of Muslims to come and live in their country. This picture provides an overall and comparative overview of the four selected European countries as to what extent countries' nationals think that [*country*] should allow Muslims from other countries to come and live in [*country*]?

		Allow many	Allow some	Allow a few	Allow none	Total
France	Count	251	952	420	234	1857
	% within Country	13,5%	51,3%	22,6%	12,6%	100%
The Netherlands	Count	235	797	609	254	1895
	% within Country	12,4%	42,1%	32,1%	13,4%	100%
The United Kingdom	Count	261	940	629	385	2215
	% within Country	11,8%	42,4%	28,4%	17,4%	100%
Germany	Count	700	1347	696	241	2984
	% within Country	23,5%	45,1%	23,3%	8,1%	100%
Total	Count	1447	4036	2354	1114	8951
	% within Country	16,2%	45,1%	26,3%	12,4%	100%
					Courses (ECC /	2014)

Table 8a: Allowance of Muslims to come and live in the four selected countries

Source: (ESS, 2014)

Based on the accumulated data and overall percentages with regard to the extent of allowance, a more profound picture can be drawn, that is, differences between countries. It is, however, noteworthy that the four response categories – allow many, allow some, allow a few, and allow none – embody ordinal measurement levels and are thus ordered along the extent of allowance. Moreover, by dividing the degree of allowance into two categories, namely the allowance of many and some in category '*tolerant*', and allowance of a few and none in category '*restrictive*', clear cross-national differences can be observed. In other words, the observed numbers never accord perfectly with the accumulated expected counts. So, whenever observed counts pan out lower than expected within the '*tolerant*' category, countries' nationals' position concerning the allowance of Muslims to come and live in their country is relatively rather negative. In the same way, a higher count vis-à-vis the relevant expected count points to a more positive attitude of a country's nationals in relative sense. The other way around, when observed counts are lower than expected within the '*restrictive*' category, a country's nationals are relatively less negative than the other countries' nationals, while a higher observed count points to a relative position.

		++ 'tolerant' +		- 'restri		
		Allow many	Allow some	Allow a few	Allow none	Total
France	Count	251	952	420	234	1857
	Expected Count	300,2	837,3	488,4	231,1	1857
The Netherlands	Count	235	797	609	254	1895
	Expected Count	306,3	854,5	498,4	235,8	1895
The United Kingdom	Count	261	940	629	385	2215
	Expected Count	358,1	998,7	582,5	275,7	2215
Germany	Count	700	1347	696	241	2984
	Expected Count	482,4	1345,5	784,8	371,4	2984
Total	Count	1447	4036	2354	1114	8951
	Expected Count	1447	4036	2354	1114	8951

Source: (ESS, 2014)

A Chi-Square test of homogeneity, along with an alpha level (a) of 0,05 and nine degrees of freedom indicates that the four selected countries differ significantly as to their nationals' positions regarding the allowance of Muslims to come and live in [country].

Chi-Square Test of Homogeneity								
Value df Asymptotic Significance (2-sided)								
Pearson Chi-Square	310,634 <sup>a</sup>	9	,000					
Likelihood Ratio	303,563	9	,000					
N of Valid Cases	8951							

a. 0 cells (0%) have expected count less than 5. The minimum expected count is 231,11.

Such a cross tabulation provides a comparative overview of countries' nationals' positions forasmuch the allowance of Muslims as an actor category. It provides a comparative indication and highlights majority-minority complexities (Burchardt & Michalowski, 2015; Lathion, 2015), but it does not suggest any presence or absence of discursive structures that either provide or hedge opportunities for Muslims as actor category explicitly. Furthermore, the question is framed in such a way that 'Muslims' as actor category is objectified and thus any inference as to Islamic religious practices or anti-Islamophobic stances is futile due to numerous lurking variables. Interestingly, however, is it to see whether the degree of countries' nationals' hospitality or hostility towards Muslims accord with discursive opportunities in the fields of Islamic religious practices and anti-Islamophobic positions. In the same way, the Friedrich Ebert Stiftung (FES) issued data on (anti)-Muslim statements, so that numbers got attached to the main conditions of intolerance, prejudice and discrimination against Muslims in Europe (Zick et al., 2011). The variable 'allowance of Muslims to come and live in a country' deals with the perception of 'Muslims' based on certain visions, characteristics, stereotypes or 'virtual Islam' (Berger, 2013) that undergird conceptions of conformity or clash. The condition on Muslims' extensive demands does not show huge discrepancies between the four countries, while at least half of all respondents agreed with the statement in all countries. An sich, this is not a surprising result, but one must bear in mind that different institutional and discursive playing fields provide different windows of opportunity for Muslims and so being too demanding must be considered vis-àvis that what can be said and thought of in a particular space and time. The condition on the fittingness of the Muslim culture into [country/Europe] shows some variation. Strikingly, only approximately seventeen per cent of the Germans find that the Muslim culture fits well into Germany, or Europe; significantly less than the other three countries. Another extreme can be found in the extent in which countries' nationals agree with the sense whether or not the majority of Muslims find terrorism justifiable. As Frenchmen were subjected to differently structured questions, comparisons are somewhat ambiguous. However, the relative high percentage in the United Kingdom for this condition can be traced back to its securitised discourse (Cesari, 2006b, 2014).

Condition	France	The Netherlands	The United Kingdom	Germany
	N = 1007	N = 1011	N = 1000	N = 1000
There are too many Muslims in [country]	36,2	41,5	44,7	46,1
Muslims are too demanding	52,8	51,8	50,0	54,1
Islam is a religion of intolerance		46,7	47,2	52,5
[For France: Islam is a religion of tolerance]	52,3*			
The Muslim culture fits well into [country/Europe]	49,8	38,7	39,0	16,6
Muslims' attitudes towards women contradict our values	78,8	78,2	81,5	76,1
Many Muslims perceive terrorists as heroes		29,2	37,6	27,9
[For France: question not asked]	-			
The majority of Muslims find terrorism justifiable		19,9	26,3	17,1
[For France: not justifiable]	23,3*			
	(Varagh &	$V_{\rm over} = 2012  \text{m} = 10.7$	7 = 2011 - 2011	

Table 9: Agreement (in percentage) on anti-Muslim statements

(Kayaoglu & Kaya, 2012, p. 10; Zick et al., 2011, p. 61)

Such indicators, sentiments and the degree in which it emphasises and puts weight on majorityminority divisions influences discursive structures for all relevant actor categories. The two ends of the spectrum – counteracting Islamophobia and non-parity Muslim group demands – are after all subjected to perceptual majority-minority proportions and ultimately made visible by public debates.

This section analyses the discursive playing field. Work package II on media content analysed countries' public debates with regard to public claims and interventions and their position towards Muslims (M. Giugni & Banfi, 2011). On a three-scale scoring system, ranging from -1 to +1, the raw and general or overall position of claims indicates the discursive trend in all countries. A score of -1 was given to claims that implied deterioration of Muslims' position or their rights, negative attitudes towards them or advocating Islamophobic and xenophobic attitudes. A score of +1 was given to interventions that showed compassion with Muslims by means of advocating improvements of their rights and disapproving Islamophobia and xenophobia. Claims without a clear position, say neutral claims, were coded 0. Such an approach does not clarify much concerning specific discursive windows of opportunity. However, it provides an interesting quantitative indicator of the four different discursive fields and contexts more generally. Unclassifiable claims were excluded (see Appendix 10 on p. 134).

	Mean score	Ν	Std. Error	In which:				
France	0.21	729	0.738	-1	0	+1		
The Netherlands	0.19	861	0.759	Deterioration of rights	Neutral	Improvement of rights		
The United Kingdom	0.22	1064	0.564	Islamophobic claims		Anti-Islamophobic claims		
Germany	-0.17	769	0.951	Source: (Cinalli & Giugni, 2013, p. 140)				

So, for the period from 1999 till 2008, the public domain concerning Muslims and Islam through prominent national newspapers seemed to be most negative in Germany. The discursive contexts in France, the Netherlands and the United Kingdom are on the positive side. Still, the standard errors signify the dynamic and fragmentised discursive contexts by polarised positions, as it gauges the precision of the estimated mean. However, how those claims are produced, that is, the composition of claims by the six discursive elements provides better insights as to the discursive playing field.

#### A comparative overview

This section sets out the six components of a discursive intervention, to wit actors, forms, addressees, contents, objects and frames<sup>27</sup>. Actors that fuel the public debates can be categorised in different ways; however, a simple division between state actors and non-state actors signifies the move away from institutional structures to discursive ones. Especially if we acknowledge that both categories can be

<sup>&</sup>lt;sup>27</sup> For a complete overview, see Appendix 11a, 11b, 11c, 11d, and 11e on pp. 135-141

sub-divided into various sub-categories, particularly civil society actors. Although the institutionalisation of Islamic religious accommodation has been a top-down process (Laurence, 2011), the essence of a bottom-up perspective is not void (Kortmann & Rosenow-Williams, 2013a). In other words, the Muslim organisations and groups' share in the public debate on the one hand, and their perception thereof must be better understood. At the same time, as argued earlier, antiracist organisations, pro-minority rights and welfare organisations, and solidarity and human rights organisations advocate for stronger anti-Islamophobia policies. Generally, however, the presence of antiracist, pro-minority, and solidarity and human rights organisations is very weak across all four countries, which is quite striking as the situation of Muslims should be a main issue for them. This might be the case because such organisations are more oriented on minorities and migrants rather than focusing on Muslims. By and large, they focus more on ethnicity than on religiosity that again signifies the practical ambiguities that come with the racialisation of Muslims. More importantly, Muslim organisations and groups as sub-category of civil society actors, have substantial interests in claims that somehow cover their religion. It is therefore not surprising that Muslim organisations and groups also issue political claims, which inter alia makes them "protagonists of claim-making rather than simple objects of others' discourses and actions" (M. Giugni & Banfi, 2011, p. 6). Still, there exist variations across countries when it comes to active mobilisation of Muslim organisations.

Table 11: Actors' distribution as a mat	1	2		U		,		nany
		ince		herlands		The United Kingdom		
Actor	N	%	N	%	N	%	N	%
State actors	216	28.8	379	42.5	440	37.6	426	54.4
Governments	125	16.7	188	21.1	182	15.6	189	24.2
Legislatives	24	3.2	99	11.1	7	0.6	30	3.8
Judiciary	22	2.9	24	2.7	92	7.9	102	13.0
Police and security agencies	24	3.2	52	5.8	150	12.8	84	10.7
State executive agencies dealing with migrants	2	0.3	3	0.3	0	0.0	10	1.3
Other state executive agencies	19	2.5	13	1.5	8	0.7	11	1.4
Political parties	27	3.6	56	6.3	63	5.4	56	7.1
Civil society actors	477	63.6	415	46.6	644	55.0	275	35.1
Unions	2	0.3	6	0.7	2	0.2	4	0.5
Workers and employees	0	0.0	1	0.1	7	0.6	2	0.3
Employer organisations and firms	2	0.3	8	0.9	19	1.6	8	1.0
Churches	17	2.3	8	0.9	10	0.9	29	3.7
Christians	10	1.3	2	0.2	13	1.1	0	0.0
Media and journalists	15	2.0	53	6.0	59	5.0	55	7.0
Professional organisations, groups, think tanks	137	18.3	141	15.8	96	8.2	37	4.8
Muslim organisations and groups	222	29.6	144	16.2	379	32.3	125	15.9
Other minority organisations and groups	15	2.0	16	1.8	8	0.7	3	0.4
Antiracist organisations and groups	10	1.3	4	0.4	5	0.4	1	0.1
Pro-minority rights and welfare organisations	1	0.2	6	0.7	6	0.5	0	0.0
Solidarity, human rights, welfare organisations	10	1.3	6	0.7	14	1.2	5	0.6
Racist and extreme right organisations and groups	16	2.1	11	1.2	8	0.7	3	0.4
Other civil society organisations and groups	20	2.6	9	1.0	19	1.6	3	0.4
Unknown actors	30	4.0	40	4.5	24	2.0	27	3.4
Total (percentage)	10	00	1	00	100		100	
N	7:	50	8	90	11	71	7	84
			Sources (Cinelli & Civeri 2012 n 126)					

Table 11: Actors'	distribution as a n	natter of visibility	and perceived	legitimacy (1999-2008)
		_		

Source: (Cinalli & Giugni, 2013, p. 136)

In order to compare the share of claims issued by Muslim organisations and groups, the Marascuilo procedure enables us to compare multiple proportions and the extent in which proportions are equal (see Marascuilo & McSweeney, 1967). The procedure tests the differences of all possible pairs of proportions, as there are several 'populations', i.e., countries under investigation (Wagh & Razvi). The table below shows stepwise the Marascuilo procedure among the 4(4-1)/2=6 proportions with 4-1=3 degrees of freedom assigning a critical value of 7,81 of the Chi-square distribution (with an alpha level ( $\alpha$ ) of 0,05)<sup>28</sup>.

Critical range: 
$$\sqrt{\chi_U^2} \sqrt{\frac{p_j(1-p_j)}{n_j} + \frac{p_{j'}(1-p_{j'})}{n_{j'}}}$$

Table 12: Marascuilo procedure ( $\chi^2(0,05; 3) = 7,81$  test-statistic) Muslim organisations and groups

Pairs	Paired proportions	Absolute difference	Critical range	Significant
$P^{\text{FR}}-P^{\text{NL}}$	0,296 - 0,162	0,134	0,058	Yes
$P^{\text{FR}}-P^{\text{UK}}$	0,296 - 0,323	0,027	0,060	No
$P^{\text{FR}} - P^{\text{GER}}$	0,296 - 0,159	0,137	0,059	Yes
$\boldsymbol{P}^{NL} - \boldsymbol{P}^{UK}$	0,162 - 0,323	0,161	0,051	Yes
$P^{\rm NL} - P^{\rm GER}$	0,162 - 0,159	0,003	0,050	No
$\mathbf{P}^{\mathrm{UK}} - \mathbf{P}^{\mathrm{GER}}$	0,323 - 0,159	0,164	0,053	Yes
				$(\alpha = 0,05)$

Every absolute difference that exceeds the critical range impersonates a significant difference. What we see is a division between France and the United Kingdom on the one side, and the Netherlands and Germany on the other side; already highlighted by the absolute proportions. "The Marascuilo procedure compares all pairs of proportions, which enables the proportions possibly responsible for rejecting  $H_0$  [*equality assumed*] to be identified" (Ibid., p. 1140). The proportions responsible for missing out on equality are either France and the United Kingdom or the Netherlands and Germany. In other words, Muslim organisations and groups influence public discourse differently among the four countries, at least in quantitative terms and their visible presence. Such a gap might indeed indicate that certain Muslim organisations and groups in the Netherlands and Germany decide to act evasively or passively, because "the debate is nonsensical and [...] they should not get involved" (Tillie et al., 2013, p. 75) in their eyes. While Muslim organisations and groups in France and the United Kingdom might choose a rather defensive or discussion model, as rectifying the wrong image and even pacifying with the non-Muslim majority implies public statements.

	France	The Netherlands	The United Kingdom	Germany
Governments	0.01	0.19	0.18	-0.35
Legislatives	0.43	-0.31	0.14	0.00
Judiciary	-0.05	0.17	0.10	-0.49
Police and security agencies	-0.25	-0.02	0.14	-0.83
Employers organisations and firms	-0.50	0.75	0.56	0.25
Churches	0.41	0.38	0.50	0.24
Media and journalists	0.07	0.30	0.19	-0.31
Professional groups, think tanks/intellectuals	0.14	0.20	0.30	0.08
Muslim organisations and groups	0.55	0.82	0.36	0.51
Antiracist organisations and groups	0.40	0.50	0.40	1.00
Solidarity, human rights and welfare organisations	0.80	0.33	0.17	0.60
Racist and extreme right organisations	-0.87	-1.00	-1.00	-1.00
N	426	805	1141	769

Table 13: Mean tone of the claim by actor and country coded from -1 to +1 (Tillie et al., 2013, p. 72)

Statham (2016) provides – with the same data set – an overview of evaluative claims per actor category. "Evaluative claims<sup>29</sup> are where actors try to push the public debate over Muslim group rights in a decisive direction, and are an important indicator for contestation" (Statham, 2016, p. 222). In

<sup>&</sup>lt;sup>28</sup> For all critical ranges, see Appendix 4 on pp. 126-127.

<sup>&</sup>lt;sup>29</sup> Claims coded 'neutral' or 'ambivalent' (0) were excluded, while claims' realisation implied some deterioration of rights or position of Muslims (-1) and claims implying an improvement (+1). A mean score was calculated "that indicates an actor's aggregate position over Muslim group rights" (Statham, 2016, p. 222).

other words, the actualisation of the claim would imply support, opposition or extension of rights for – or the position of – Muslims.

	France		The N	letherlands	The U	nited Kingdom	Gen	<u>many</u>
	%	Posit.	%	Posit.	%	Posit.	%	Posit.
State and judiciary	19.2	+0.31	24.4	+0.37	32.3	+0.80	42.2	-0.05
Legislative and political parties <sup>30</sup>	11.9	+0.63	25.0	-0.44	7.5	+0.14	16.1	-0.06
'Native' civil society organisations and groups	29.6	+0.35	33.3	+0.42	37.6	+0.83	24.1	-0.08
Muslim/Islamic actors	39.3	+0.93	17.3	+1.00	22.6	+1.00	17.6	+0.54
All	100	+0.60	100	+0.29	100	+0.81	100	+0.05
Ν	135	135	156	156	93	93	199	199
				~	<i>.</i> ~			

Source: (Statham, 2016, p. 223)

Public discourse is fuelled by actors in various ways as their actions could have different forms. Generally, verbal statements like interviews, press conferences and written declarations dominate public debates. Other forms are state interventions, such as repressive measures or political decisions, but also conventional actions, like judicial action, direct-democratic action, indoor-meetings and petitioning are forms of communicating a political message. Furthermore, protest actions, albeit demonstrative, confrontational or violent aim at diffusing a political stance. Protest actions are interesting phenomena as 'contentiousness' is primarily triggered by states' institutional approaches. It is worth noting that certain actors issue certain forms of action, say state actors are able to conclude political decisions, while demonstrative, confrontational and violent protests are primarily executed by civil society actors. Unsurprisingly, we observe a very high share of verbal statements in all four countries, as all actors could state their position on the subject-matter. With regard to the three forms of protest actions, we hit upon France and Germany; states that have respectively the highest and lowest shares of both, civil society actors and protest actions. Moreover, we observe huge discrepancies between France and the Netherlands on the one side, and the United Kingdom and Germany on the other side regarding states' interventions, and repressive measures in particular. This might indeed indicate the degree to which the Christian religion is privileged – albeit constitutionally or practically - respectively in the United Kingdom and Germany (as set out by Statham, 2016) as France and the Netherlands have significant lower numbers of repressive measures.

	Fra	ince	The Netherlands		The United Kingdom		<u>Germany</u>	
Form	Ν	%	Ν	%	Ν	%	Ν	%
State interventions	75	10.0	85	9.6	251	21.4	171	21.8
Repressive measures	32	4.3	51	5.8	158	13.5	132	16.8
Political decisions	43	5.7	34	3.8	93	7.9	39	5.0
Verbal statements	546	72.8	668	75.1	694	59.3	491	62.6
Conventional actions	68	9.0	77	8.6	153	13.1	100	12.8
Protest actions	61	8.2	60	6.7	73	6.2	22	2.8
Demonstrative protests	34	4.5	14	1.6	28	2.4	10	1.3
Confrontational protests	6	0.9	10	1.1	14	1.2	3	0.4
Violent protests	21	2.8	36	4.0	31	2.6	9	1.1
Total (percentage)	100		1(	00	100		100	
Ν	7	50	890		1171		784	

Table 14a: Forms of discursive interventions (1999-2008) (Cinalli & Giugni, 2013, p. 137)

This table highlights the core of discursive structures forasmuch the core concept of visibility, as the form of a discursive intervention provokes a reaction, that is, a specific claim resonates rationally and emotionally. Moreover, as certain forms only go together with particular actors, a sense of legitimacy comes into play. Essentially, a political decision by state actors has a more profound institutional impact than violent protests organised by racist and extreme right organisations and groups. It is

 $<sup>^{30}</sup>$  N < 20 cases (N = 16 in France; N = 7 in the United Kingdom)

therefore that a sense of legitimacy is encapsulated in the actor's discursive image who issues a claim in a certain form (Baumgarten & Ullrich, 2016). Concerning the form-category of discursive interventions, the public discourse in United Kingdom and Germany seem to be more dominated by state interventions than it is the case in France and the Netherlands. State interventions are primarily composed of repressive measures in these two countries, pointing to tougher stance towards Muslim immigrants in general (M. Giugni & Banfi, 2011).

	Fra	France The Netherlands		The United	ne United Kingdom		<u>nany</u>	
Form	Ν	%	Ν	%	Ν	%	Ν	%
Repressive measures	32	42,7	51	60.0	158	62.9	132	77.2
Political decisions	43	57.3	34	40.0	93	37.1	39	22.8
State interventions	75	100	85	100	251	100	171	100

Table 14b: State interventions

Table 15: Marascuilo procedure ( $\chi^2(0,05; 3) = 7,81$  test-statistic) Repressive measures

			-	
Pairs	Paired proportions	Absolute difference	Critical range	Significant
$P^{\text{FR}} - P^{\text{NL}}$	0,427 - 0,600	0,173	0,218	No
$P^{FR} - P^{UK}$	$0,\!427 - 0,\!629$	0,202	0,181	Yes
$P^{\text{FR}} - P^{\text{GER}}$	0,427 - 0,772	0,345	0,183	Yes
$P^{\rm NL} - P^{\rm UK}$	0,600 - 0,629	0,029	0,171	No
$\mathbf{P}^{\mathrm{NL}} - \mathbf{P}^{\mathrm{GER}}$	0,600 - 0,772	0,172	0,173	No
$\mathbf{P}^{\mathrm{UK}} - \mathbf{P}^{\mathrm{GER}}$	0,629 - 0,772	0,143	0,123	Yes
	•			$(\alpha = 0,05)$

We must conclude that the share of claims consisting of repressive measures is mostly visible in Germany for the state as actor-category, because its proportion of repressive measures is significant higher than United Kingdom's; the second highest proportion of repressive measures. This is in line with Table 10 on page 41.

Related to claim-making actors and the forms in which claims are diffused, the addressed issue or that what is conveyed nourishes public discourse. A division can be made based on stepwise migration policies, from immigration, asylum and aliens politics to minority integration politics, and ultimately to antiracism and Islamophobic issues. Such a division is fruitful since conveyed issues in the first field influence issues on minority integration policies forasmuch citizenship, social, cultural and religious rights. It is important to understand that institutional structures undergird national debates as national citizenship policies and church-state regimes oftentimes function as points of reference. Moreover, political discourse is embedded in power relations. There are two main strands when it comes to discourse studies of politics, namely politics seen "as a struggle for power, between those who seek to assert and maintain their power and those who seek to resist it [and politics seen] as cooperation, as the practices and institutions that a society has for resolving clashes of interest over money, influence, liberty, and the like" (Chilton, 2004, p. 4). From there, the struggle for the hegemonic discourse or frame as "central organizing idea or story line that provides meaning" (Gamson & Modigliani, 1987, p. 143) to events related to an issue" (as cited in Pan & Kosicki, 1993, p. 56) can be identified through the division and classification of issues concerning the place of Islam in a particular society. In other words, when we talk about the position of Islam or Muslims in our country, what are or should we actually talk about? So, the more the national public debate is centred on immigration, asylum and alien politics, the more likely it is that issued claims in the minority integration category can be conceived as 'contentious' when it deviates from the norm. The granting of rights, albeit citizenship, social, cultural or religious rights presupposes permanent settlement. However, one must bear in mind that claims covering particular issues can be supportive, vicious or rather neutral, meaning that there is no uniform relation between any issue-category. It is the mere share of claims in particular categories that suggest contentiousness and thus provide information for certain actor-categories when it comes to diffusion. Moreover, if one analyses the minority rights and participation with regard to religious rights, the essence of institutional opportunity structure comes to the fore, because some involve public institutions.

Table 10a. Issue of claims as a matte		ance	The Neth	/	The United Kingdom		Gerr	many
Issue	N	%	N	%	N	%	Ν	%
Immigration, asylum, and alien politics	25	3.3	36	4.0	22	1.9	49	6.2
Minority integration politics	585	78.0	681	76.5	802	68.5	603	76.9
Minority integration in general	92	12.3	74	8.3	31	2.7	30	3.8
Minority rights and participation					-			
Citizenship rights	28	3.7	17	1.9	18	1.6	32	4.0
Social rights	10	1.3	24	2.7	27	2.3	8	1.0
Cultural rights	17	2.3	12	1.3	16	1.4	4	0.5
Religious rights	185	24.7	209	23.5	165	14.1	210	26.8
Other rights	11	1.5	1	0.1	7	0.6	2	0.3
Discrimination and unequal treatment	15	2.0	14	1.6	56	4.8	6	0.8
Minority social problems	132	17.6	253	28.4	439	37.5	301	38.4
Inter-ethnic, inter-, and intraorganisational relations	95	12.7	77	8.7	43	3.7	10	1.3
Antiracism/Islamophobia	84	11.2	103	11.6	187	16.0	101	12.8
Racism/Islamophobia in institutional context	53	7.1	81	9.1	44	3.8	63	8.0
Non-institutional racism/Islamophobia/xenophobia	31	4.1	22	2.5	143	12.2	38	4.8
Islamophobic claims	32	4.3	39	4.4	30	2.5	16	2.0
Actor claims Muslims	21	2.8	29	3.3	108	9.2	14	1.8
Homeland politics	2	0.3	8	0.9	10	0.9	3	0.4
Transnational politics	19 3	2.5	21	2.4	97	8.3	11	1.4
Other		0.4	2	0.2	22	1.9	1	0.1
Total (percentage)	1	00	10	0	10	00	1	00
N	7	50	89	0	11	71	7	84
Other Total (percentage)		00	10 89	0	10	00 71	1	00

Table 16a: Issue of claims as a matter of contentiousness (1999-2008)

Source: (Cinalli & Giugni, 2013, p. 139)

If we take a closer look at the different types of minority rights and antiracism or Islamophobic discursive interventions, a clearer picture emerges as to the two sides of the spectrum. Roughly between -50% in the United Kingdom and 54,1% in Germany - people find Muslims too demanding (Kayaoglu & Kaya, 2012, p. 10; Zick et al., 2011, p. 61) while in all four countries, religious rights are the most discussed types of rights, more so than citizenship, social or cultural rights.

	Fra	ince	The Neth	nerlands	<u>The United King</u>		Germany	
	Ν	%	Ν	%	Ν	%	Ν	%
Citizenship rights	28	11,67	17	6,49	18	7,96	32	12,60
Social rights	10	4,17	24	9,16	27	11,95	8	3,15
Cultural rights	17	7,08	12	4,48	16	7,08	4	1,57
Religious rights	185	77,08	209	79,77	165	73,01	210	82,68
Total	240	100	262	100	226	100	254	100
Source: (Cinalli & Giugni 2013 p. 139								

Table 16b: Claims on types of rights as a matter of contentiousness (1999-2008)

Source: (Cinalli & Giugni, 2013, p. 139)

Religious rights are "entitlements (not) to perform certain actions or be in certain states, or entitlements that others (not) perform certain actions [...] regarding the performance (e.g., to be buried according to Islamic prescriptions) or non-performance (e.g., dispensation from mixed swimming classes) of certain actions for religious reasons, or they are about entitlements that require others to perform (e.g., to create prayer spaces in schools) or refrain from performing (e.g., not to depict the Prophet Mohammed) certain actions for religious reasons" (Carol & Koopmans, 2013, pp. 166-167). As the shares of those who consider Muslims as too demanding are reasonably high and religious rights is the dominant type of claims, contentiousness is certainly concentrated within this rights-category. As many claims on religious rights refer to public institutions, pre-existing church-state ideologies, institutional arrangements and the nature of citizenship rights' approaches certainly define discursive contexts as a matter of path dependency (Tatari, 2009). Therefore "differential institutional

contexts define opportunity structure for claim-making about Islamic religious rights, and explain why certain rights are highly controversial in one country, while they are hardly debated at all in other countries, either because they are consensually accepted, or because they are consensually rejected" (Carol & Koopmans, 2013, p. 166).

T-1.1. 1/	<b>C1</b> .			(in percentages)
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1 4010 100.	Ciums on	IUIIGIOUS	IIGIND	(III percentages)

	France	The Netherlands	The United Kingdom	Germany
Rights and religious practice	8.0	4.6	3.8	7.4
Religious rights and public institutions	84.0	77.6	59.1	84.3
Other	8.0	17.8	37.1	8.3
	162 (100%)	174 (100%)	132 (100%)	204 (100%)
	•	, a í		

Source: (M. Giugni & Banfi, 2011, p. 9)

The average percentage of claims on religious rights and public institutions for all four countries is 77,5%. Both, France and Germany seem to be more concerned with religious rights inside public institutions, which is not very surprising given their rather restrictive position in this regard (Tillie et al., 2013, pp. 44-46); and thus this restrictive position seem to serve as point of reference.

Table 16d: Claims on (anti-)institutional	and non-institutional	al racism or Islamophobia (1999-2008)
		· · · · · · · · · · · · · · · · · ·

	France		The N	etherlands	The United Kingdom		<u>Germany</u>	
	Ν	%	N	%	Ν	%	N	%
Racism/Islamophobia in institutional context	53	63,10	81	78,64	44	23,53	63	62,38
Non-institutional racism/Islamophobia/xenophobia		36,90	22	21,36	143	76,47	38	37,62
Antiracism/Islamophobia	84	100	103	100	187	100	101	100
Islamophobic claims	32	100	39	100	30	100	16	100
-			S	Jurca (Cine	Ili & Gium	ni 2013 n 1	30)	

Source: (Cinalli & Giugni, 2013, p. 139)

With regard to Islamophobia, a distinction must be made between Islamophobic and anti-Islamophobic claims. An (anti-)Islamophobic claim is typically a claim that resonates as a matter of controversy and therefore highly visible. Moreover, an antiracist or anti-Islamophobic claim can encompass an institutional dimension. "Institutions are stable, valued, recurring patterns of behaviour" (Huntington, 2006, p. 12). An environment is characterised by its system of bodies, regulations, rules, policies, procedures and processes. Such systems - or 'regimes of truth' (Baumgarten & Ullrich, 2016) – have a certain social purpose and govern a given society's individuals' behaviour. From here, racism and Islamophobia in institutional context can be considered as more controversial than noninstitutional forms, as it signifies reoccurring patterns of behaviour at the 'agent-level' rather than incidental cases. For France, The Netherlands and Germany we indeed see that claims on racism and Islamophobia have more often an institutional character. This signifies the interplay between institutional structures, discursive opportunities and thus the discursive playing field Muslims find themselves in. Overall, the discursive trend in the United Kingdom – both for group demands and anti-Islamophobia – seems to have a lower institutional character than the other three countries. This is highlighted by the relatively small shares of claims concerning religious rights and racism or Islamophobia in institutional context (see Table 16a on p. 46). Moreover, transnational politics seem to be regarded as more important in the United Kingdom than the other three countries, pointing to the relative importance of home affairs.

Furthermore, claims have objects, as the realisation of a claim would hypothetically affect rights, interests or even the identity of a group or individual. The objectification of a claim is a matter of framing and thus could trigger discontent with regard to a claim's legitimacy; bringing resonance. As this search focuses primarily on the discursive opportunities for Muslims forasmuch group demands and counteracting Islamophobia, claims could be directed to various objects. Again, some cross-national differences can be observed forasmuch object categories. The main observation to be made here is the share of claims that directs directly to Islam or Muslims in general. This means that the object-categories 'All Muslims in general', 'Majority/most Muslims', 'Islam in general', and 'Islam mainstream' point to a belief-system, an entire or the majority of a religious group.

		nce	The Net	,	The United	d Kingdom	Ger	<u>many</u>
	Ν	%	N	%	Ν	%	Ν	%
Muslims as actors	430	57.4	538	60.4	748	63.9	709	90.4
All Muslims in general	207	27.6	289	32.4	312	26.6	99	12.6
Majority/most Muslims	14	1.9	23	2.6	16	1.4	13	1.7
Minority/small group/particular Muslim category	140	18.7	112	12.6	215	18.4	395	50.4
Individual Muslims	56	7.5	101	11.3	177	15.1	174	22.2
Unclassifiable Muslims	13	1.7	13	1.5	28	2.4	28	3.5
Islam as religion		15.7	93	10.5	33	2.8	59	7.6
Islam in general	68	9.1	63	7.1	23	2.0	18	2.3
Islam mainstream	9	1.2	1	0.1	0	0.0	1	0.1
Minority currents within Islam	10	1.3	18	2.0	0	0.0	0	0.0
Specific religious stream/movement within Islam	25	3.3	8	0.9	9	0.8	40	5.2
Unclassifiable Islam	6	0.8	3	0.4	1	0.1	0	0.0
No Muslims object	202	26.9	259	29.1	390	33.3	16	2.0
Total (percentage)	1(	)0	100		100		100	
Ν	75	50	890		1171		784	

Table 17: Objects of claims on Muslims in the four countries (1999-2008)

Sources: (Cinalli & Giugni, 2013, p. 142)

The accumulated percentages prove that in the Netherlands (42.2) and France (39.8) rather many claims have a generalising trait. To a lesser extent in the United Kingdom (30.0) – and especially Germany (16.7) – the objects of claims are subjected to a generalising tendency. Koomen, Tillie, Van Heelsum and van Stiphout (2013) suggest that the specification [S] of the Islam or Muslim object categories and the position [P] towards Islam or Muslim object categories can be considered as two main pillars of the public debate (Koomen et al., 2013, p. 195) (see Appendix 10 on p. 134). Generalising tendencies have several implications. First, the Muslim minorities residing in all four countries are non-heterogeneous along many lines, say ethnicity, religious branches, political affiliation and activism, and thus claims accord differently across these lines. Second, 'Islam' and 'Muslims' are chronic 'objects' of debate bringing both, struggles between competing internal and external representations of which some flow through mass media channels, while other do not. Such mechanisms trigger the possible "erosion of locally embedded modes of social and religious reproduction" (Brubaker, 2013, p. 4) and thus other- and self-identifications. Such a comparative overview essentially represents the pivot of discursive structures by means of the visibility of claims. Ideally, a claim is legitimate and resonates far and thus presents what the main actors find; however, usually high resonance is caused by controversy bringing a net decrease in legitimacy, although fuelling the public debate. The institutional side of as well the accommodation of Islamic religious practices as counteracting Islamophobic provides points of reference that undergird national debates. However, sentiments and positions are unevenly visible and thus a closer look provides a fruitful indication as to whether we see a fair representation in the media. This might be problematic however, for various - primarily methodological - reasons. It is useful to find discrepancies between that what seems to be the hegemonic discourse and the positions of Muslim minorities and non-Muslim majority towards, what is written and said in the media, seem to be the most obvious. Therefore, the perceived distance between the two groups provides a legitimate starting point.

#### Perceived cultural distance

In all countries under scrutiny, the non-Muslim majority perceives the cultural distance between them and Muslims to be bigger than vice versa (FRA, 2016). Moreover, the issues on which cultural distance is believed to persist differs between the two groups; "the most divisive issue for the non-Muslim majority seems to be the division of roles between men and women in the household, whereas among the Muslim groups this issue is either seen as non-divisive or comes second to the role of religion in society" (Tillie et al., 2013, p. 61). Third, the freedom of speech is less of an issue that, by perception, divides both groups. Essentially the perceived distance – modes of living for non-Muslim

majority and the role of religion in society for Muslim groups – will be analysed through several relevant data on cultural life, customs, traditions and the separation of church and state. *The European Values Survey Integrated Dataset* (2008) provides data on natives' perceptions on the extent to which immigrants' undermine host country's cultural life. The outcomes are displayed in Table 18 below.

	14010 101 1011			, e mini j .								
		1	2	3	4	5	6	7	8	9	10	Total
FRA	Count	129	76	129	118	259	88	118	210	119	242	1488
	Expected Count	154,4	107,2	168,9	160,1	238,7	107,7	148,3	195,4	69,6	137,6	1488
	% within country	8,7%	5,1%	8,7%	7,9%	17,4%	5,9%	7,9%	14,1%	8,0%	16,3%	100%
NL	Count	68	73	159	191	222	148	228	242	77	123	1531
	Expected Count	158,9	110,3	173,8	164,7	245,6	110,8	152,6	201,1	71,6	141,6	1531
	% within country	4,4%	4,8%	10,4%	12,5%	14,5%	9,7%	14,9%	15,8%	5,0%	8,0%	100%
UK	Count	268	139	201	173	216	98	130	134	55	102	1516
	Expected Count	157,3	109,3	172,1	163,1	243,2	109,7	151,1	199,1	70,9	140,2	1516
	% within country	17,7%	9,2%	13,3%	11,4%	14,2%	6,5%	8,6%	8,8%	3,6%	6,7%	100%
GER	Count	216	185	256	224	356	141	178	276	56	140	2028
	Expected Count	210,4	146,2	230,2	218,2	325,4	146,8	202,1	266,4	94,9	187,6	2028
	% within country	10,7%	9,1%	12,6%	11,0%	17,6%	7,0%	8,8%	13,6%	2,8%	6,9%	100%
Total	Count	681	473	745	706	1053	475	654	862	307	607	6563
	Expected Count	681	473	745	706	1053	475	654	862	307	607	6563
	% within country	10,4%	7,2%	11,4%	10,8%	16,0%	7,2%	10,0%	13,1%	4,7%	9,2%	100%
										1	EVE 20	1()

# Table 18: Immigrants undermine country's cultural life<sup>31</sup>

Source: (EVS, 2016)

					95% Confidence Interval for Mean		
	Ν	Mean	Std. Deviation	Std. Error	Lower Bound	Upper Bound	
France	1488	6,02	2,868	,074	5,88	6,17	
Netherlands	1531	5,82	2,438	,062	5,70	5,94	
United Kingdom	1516	4,62	2,761	,071	4,48	4,76	
Germany	2028	5,05	2,637	,059	4,93	5,16	
Total	6563	5,35	2,732	,034	5,28	5,42	

ANOVA									
	Sum of Squares	df	Mean Square	F	Sig.				
Between Groups	1998,722	3	666,241	93,025	,000				
Within Groups	46975,143	6559	7,162						
Total	48973.865	6562							

In order to make sense of this data, I propose a bifurcation between the five lower and upper answer categories, that is, 1 up to 5 represent gradually negative to somewhat negative stances, while 6 up to 10 – incrementally – positive ones. Such a division only serves as a point of references as the variable "immigrants undermine country's cultural life" (EVS, 2016) has given an interval measurement level and therefore all ten different answer categories embody the same size and discrepancies. A note must be made on the wording of this indicator, as *'immigrant'* does not embody any religious and thus Islamic quality; to wit converted native non-migrant Muslims and non-Muslim immigrants. This again signifies the racialisation of a religious group. However, it provides a picture of the perceived adherence to a host country's cultural life that inter alia indicates the discursive reception of Muslim immigrants too. Moreover, 'undermining cultural life' presupposes a perceived cultural life in the host country that might be undermined by immigrants as they might in one way or another disrupt (CambridgeDictionary, 2017) this mode of living. In other words, this indicator suggests the difference between the perceived cultural life and perceived extent in which immigrants – possibly, not surely Muslims – undermine this cultural life, in the four selected countries. Still, the actual perception of

 $<sup>^{31}</sup>$  1 = Undermine cultural life; 10 = Do not undermine cultural life

discursive opportunities depends on perceived other-identifications (Brubaker, 2013) and thus contributing to both, rationalisation and emotionalisation concerning the existent structures.

		6	restrictive	? <b>`</b>		'tolerant'					
	1	2	3	4	5	6	7	8	9	10	
FRA	-0,16	-0,29	-0,24	-0,26	0,09	-0,18	-0,20	0,07	0,71	0,76	
NL	-0,57	-0,34	-0,09	0,16	-0,10	0,34	0,49	0,20	0,08	-0,13	
UK	0,70	0,27	0,17	0,06	-0,11	-0,11	-0,14	0,33	-0,22	-0,27	
GER	0,03	0,26	0,11	0,03	0,09	-0,04	-0,12	0,04	-0,41	-0,25	

Table 19: Discrepancies between countries as to immigrants undermining cultural life in host country

This table shows us various interesting insights. First of all this table does not solely follow the indicative colours of the previous table as they also represent the extent in which the actual count differs from the expected count. This table therefore shows that besides cross-national differences for this variable; those differences occur primarily towards the extremes; say for answer categories 1, 2, 9, and 10 and to a lesser extent between 3 and 8. One important methodological note must be made here. The differences between the expected and observed counts can either be interpreted positively or negatively, there is thus a bifurcation in play here. This bifurcation is based on a '*tolerant-restrictive*' perspective, so that any difference implies either a positive or negative sign in comparative fashion. Moreover, this means that a mirror point or threshold category must be defined, which is logically the 5 to 6 partition, dividing the table into two parts. The following formula provides whether an answer category received more or less than expected, and by which factor:

# $x = \frac{Observed \ count - Expected \ count}{Expected \ count}$

The expected count signifies the point of reference, that is, the hypothesised outcome based on an accumulated observed distribution of all four countries. Subsequently, based on the bifurcation and its mirror point, a minus sign must be interpreted differently for the '*tolerant*' and '*restrictive*' sides. Table 19 signifies that natives in the United Kingdom and Germany are more concerned with immigrants undermining cultural life in these respective countries. Even though, such a ranking order provides a helpful tool to observe cross national differences, the differences within countries must not be neglected.

	Smallest share (answer category)	Biggest share (answer category)
France	5,1% (2)	17,4% (5)
The Netherlands	4,4% (1)	15,8% (8)
The United Kingdom	3,6% (9)	17,7% (1)
Germany	2,8% (9)	17,6% (5)

In the same way, natives' perception forasmuch immigrants' customs and traditions, and the extent to which immigrants maintain their own or take over customs of their country of residence have been surveyed. This indicator centres rather on natives' perception of immigrants' assimilative ability and willingness to do so, which embodies one of the main pillars of natives' discontent (Bisin, Patacchini, Verdier, & Zenou, 2008). As stated earlier, the non-Muslim majority seem to perceive the customary division of roles between men and women in the household as the main dividing issue causing cultural distance (Meghan Benton & Nielsen, 2013; Norris, 2004). Again, immigrants as object of interest do not contain any religious identification. The perception of natives towards immigrants' customs and traditions – and dissimilarity to their own customs and traditions – indicates nationals' observance of the different multicultural modes of living. This predominantly civic-cultural indicator of migrants does not necessarily overlooks the religious aspects, as 'cultural interactions between Muslim immigrants and receiving societies' (Tillie et al., 2013). Moreover, "in some countries immigration is almost identical with Muslim immigration rendering Islam deviant on multiple scales" (Burchardt &

Michalowski, 2015, p. 12)<sup>32</sup>. It suffices here to say that this side, European societies' reception of immigrants, cannot overlook the rapidly expanding Muslim population – i.e., first, second and third generations – in Europe.

	Migrants (thousands)	Migrants of total population (%)	Muslims of total population (%)			
France	7 784.4	12	7.5			
The Netherlands	1 979.5	12	6			
The United Kingdom	8 543.1	13	4.8			
Germany	12 005.7	15	5			
(Hackett et al., 2015; UN, 2016)						

Cultural customs and traditions separate Muslim communities from the non-Muslim majority (Gallis, 2005). Muslim immigrants represent the most controversial migrant-category as it triggers European policymakers to find a way to celebrate "cultural diversity, maintain social cohesion, and accommodate minorities" (Norris & Inglehart, 2012, p. 2). Norris and Inglehart further state that data "from the WVS/EVS (1999- 2001) indicates that religious traditions have historically shaped national cultures, but today their impact is transmitted mainly through nation-wide institutions, to the population as a whole" (Ibid., p. 8). One cannot deny the importance of public opinion in European societies, "as perceptions of immigration is one of the factors facilitating or restricting processes of integration. But this only reflects one side of the relationship, rather than directly comparing the cultural values of minority and majority populations" (Ibid., p. 11). This side, European societies' reception of immigrants, partly stems from their ideas about the extent to which immigrants maintain their own or take over customs. *The European Values Survey* (2016) issued data on this side of the relationship, which is set out in the following tables for the four countries under scrutiny.

Table 20:	Immigrants	maintain	own/take	over	customs <sup>33</sup>

	1	2	3	4	5	6	7	8	9	10	Total
Count	99	53	103	78	346	125	146	199	142	194	1485
Expected Count	82,0	79,2	132,1	109,0	284,0	140,1	171,9	209,5	94,9	182,3	1485
% within country	6,7%	3,6%	6,9%	5,3%	23,3%	8,4%	9,8%	13,4%	9,6%	13,1%	100%
Count	34	35	86	100	278	204	277	276	90	148	1528
Expected Count	84,3	81,5	136,0	112,1	292,2	144,1	176,8	215,6	97,6	187,6	1528
% within country	2,2%	2,3%	5,6%	6,5%	18,2%	13,4%	18,1%	18,1%	5,9%	9,7%	100%
Count	75	61	118	109	287	131	147	191	118	278	1515
Expected Count	83,6	80,8	134,8	111,2	289,8	142,9	175,3	213,8	96,8	186,0	1515
% within country	5,0%	4,0%	7,8%	7,2%	18,9%	8,6%	9,7%	12,6%	7,8%	18,3%	100%
Count	153	200	275	193	340	157	187	257	68	183	2013
Expected Count	111,1	107,4	179,1	147,7	385,0	189,9	233,0	284,1	128,6	247,1	2013
% within country	7,6%	9,9%	13,7%	9,6%	16,9%	7,8%	9,3%	12,8%	3,4%	9,1%	100%
Count	361	349	582	480	1251	617	757	923	418	803	6541
Expected Count	361,0	349,0	582,0	480,0	1251,0	617,0	757,0	923,0	418,0	803,0	6541
% within country	5,5%	5,3%	8,9%	7,3%	19,1%	9,4%	11,6%	14,1%	6,4%	12,3%	100%
	Expected Count % within country Count Expected Count % within country Count Expected Count % within country Count Expected Count % within country Count Expected Count % within country	Expected Count82,0% within country6,7%Count34Expected Count84,3% within country2,2%Count75Expected Count83,6% within country5,0%Count153Expected Count111,1% within country7,6%Count361Expected Count361,0	Count         99         53           Expected Count         82,0         79,2           % within country         6,7%         3,6%           Count         34         35           Expected Count         84,3         81,5           % within country         2,2%         2,3%           Count         75         61           Expected Count         83,6         80,8           % within country         5,0%         4,0%           Count         153         200           Expected Count         111,1         107,4           % within country         7,6%         9,9%           Count         361         349           Expected Count         361,0         349,0	Count9953103Expected Count82,079,2132,1% within country6,7%3,6%6,9%Count343586Expected Count84,381,5136,0% within country2,2%2,3%5,6%Count7561118Expected Count83,680,8134,8% within country5,0%4,0%7,8%Count153200275Expected Count111,1107,4179,1% within country7,6%9,9%13,7%Count361349582Expected Count361,0349,0582,0	Count995310378Expected Count82,079,2132,1109,0% within country6,7%3,6%6,9%5,3%Count343586100Expected Count84,381,5136,0112,1% within country2,2%2,3%5,6%6,5%Count7561118109Expected Count83,680,8134,8111,2% within country5,0%4,0%7,8%7,2%Count153200275193Expected Count111,1107,4179,1147,7% within country7,6%9,9%13,7%9,6%Count361349582480Expected Count361,0349,0582,0480,0	Count995310378346Expected Count82,079,2132,1109,0284,0% within country6,7%3,6%6,9%5,3%23,3%Count343586100278Expected Count84,381,5136,0112,1292,2% within country2,2%2,3%5,6%6,5%18,2%Count7561118109287Expected Count83,680,8134,8111,2289,8% within 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Source: (EVS, 2016)

					95% Confidence Interval for Mean		
	Ν	Mean	Std. Deviation	Std. Error	Lower Bound	Upper Bound	
France	1485	6,15	2,621	,068	6,02	6,29	
Netherlands	1528	6,42	2,164	,055	6,31	6,53	
United Kingdom	1515	6,34	2,681	,069	6,21	6,48	
Germany	2013	5,27	2,664	,059	5,15	5,38	
Total	6541	5,99	2,596	,032	5,92	6,05	

<sup>&</sup>lt;sup>32</sup> See (Spruyt & Elchardus, 2012; Strabac & Listhaug, 2008)

 $<sup>^{33}</sup>$  1 = Maintain distinct customs and traditions; 10 = Take over the customs of the country

		ANOVA	1		
	Sum of Squares	df	Mean Square	F	Sig.
Between Groups	1569,148	3	523,049	80,439	,000
Within Groups	42506,641	6537	6,502		
Total	44075,789	6540			

Table 21: Discrepancies between countries as to immigrants' distinct customs and traditions

		٤.	restrictive	?'				<i>`tolerant</i> '		
	1	2	3	4	5	6	7	8	9	10
FRA	0,21	-0,33	-0,22	-0,28	0,22	-0,11	-0,15	-0,05	0,50	0,06
NL	-0,60	-0,57	-0,37	-0,11	-0,05	0,42	0,57	0,28	-0,08	-0,21
UK	-0,10	-0,25	-0,12	-0,02	-0,00	-0,08	-0,16	-0,11	0,22	0,49
GER	0,38	0,86	0,54	0,31	-0,12	-0,17	-0,20	-0,10	-0,47	-0,23

Again, the main differences can be found at and towards the extremes. Like the previous indicator, Germans seem to maintain a rather 'restrictive' stance here, also relative to Britons. Germans thus tend to perceive immigrants as relatively more unable or unwilling to take over German customs and traditions than nationals of the other three countries. These two indicators, the perceived undermining of a host country's cultural life and the perceived inability or unwillingness of immigrants to take over customs and traditions, only represent one side of the complex relation between host countries' nationals and immigrants. As stated earlier, the academic literature primarily focuses on institutional arrangements and accommodation of Islamic religious minorities in Europe and the positions non-Muslim majorities hold vis-à-vis these communities. The oftentimes heard proposition that European natives are less religious compared to immigrants residing in Europe seem to be veracious. Religious attendances, frequency of praying, subjective religiosity or self-declared religiosity are strong indicators of such propositions. For all three indicators, immigrants residing in France, the Netherlands, the United Kingdom and Germany produce higher levels of religiosity compared to natives (Van Tubergen & Sindradottir, 2011, p. 281). Subsequently, discrepancies in levels of religiosity could be discerned across a range of social attitudes. Lewis and Kashyap (2013) found that Muslims seem to be "more conservative than other Britons across the range of social attitudes: gender roles in a family, divorce, premarital sex, several cases of abortion, homosexuality, and gay marriage" (V. A. Lewis & Kashyap, 2013, p. 625). Overall, those who are more religious tend to maintain more conservative moral and social attitudes. From here, it is essential to consider Muslims' position forasmuch the role of religion in society, which is arranged through various types of church-state relations across the four countries (Cesari, 2014; Ferrari, 2002). Church-state relations are institutionalised in such a way that Muslims across the four countries - not irrespective of variations of ethnic proportions - experience the status-quo differently. The EURISLAM project, as part of work package III on 'cultural distance', gathered data on Muslims' position towards the separation of church and state in their country of residence. As ruling ideal, the separation of church and state - and to a lesser extent the role of religion in society - provides a legitimate foundation on Muslims' view on their perceived institutional opportunities.

					95% Confidence Interval for Mean			
	Ν	Mean	Std. Deviation	Std. Error	Lower Bound	Upper Bound	Minimum	Maximum
France	1084	3,0332	1,43521	,04359	2,9477	3,1187	1,00	5,00
Netherlands	1093	3,1107	1,17732	,03561	3,0408	3,1806	1,00	5,00
United Kingdom	1299	3,4280	1,22946	,03411	3,3611	3,4949	1,00	5,00
Germany	1312	2,9047	1,30220	,03595	2,8342	2,9753	1,00	5,00
Total	4788	3,1228	1,30255	,01882	3,0859	3,1597	1,00	5,00

Table 22a: Opinions concerning the separation of church and state per country of residence<sup>34</sup>

<sup>&</sup>lt;sup>34</sup> For a detailed tables, see Appendix 7 on p. 130

		Agree		Neither agree nor		Disagree	
		strongly	Agree	disagree	Disagree	strongly	Total
France	Count	204	229	235	159	257	1084
	% within country	18,8%	21,1%	21,7%	14,7%	23,7%	100%
The Netherlands	Count	77	329	226	318	143	1093
	% within country	7,0%	30,1%	20,7%	29,1%	13,1%	100%
The United Kingdom	Count	120	177	314	403	285	1299
	% within country	9,2%	13,6%	24,2%	31,0%	21,9%	100%
Germany	Count	213	372	223	335	169	1312
	% within country	16,2%	28,4%	17,0%	25,5%	12,9%	100%
Total	Count	614	1107	998	1215	854	4788
	% within country	12,8%	23,1%	20,8%	25,4%	17,8%	100%
				U (U	1 1 0 7	<b>D'11' OO1</b>	

Table 22b: Countries' citizens and their op	pinion on separation o	f church and state
---------------------------------------------	------------------------	--------------------

Source: (Hoksbergen & Tillie, 2016)

Huge dissensions persist in all four countries; pointed out by the huge shares in the 'neither agree nor disagree' category and absentia of explicit outliers. At the same time, however, the interpretation of church-state separation not solely depends on the destination, but also on origins (Norris & Inglehart, 2012) or "cultural attitudes and practices that are ascribed to Islam [that] must in fact be attributed to non-religious cultural factors" (Tillie et al., 2013, p. 17). Therefore, shedding light on the different Muslim minority compositions – and thus Muslim minorities – is fruitful. Communing data on ethnic, religious and national factors is challenging for several reasons. While nationality is defined by the state and religiosity is a self-declared identity, ethnicity is 'a something in between' category. "The concept of foreign population may include persons born abroad who retained the nationality of their country of origin but also second and third generations born in the host country" (OECD, 2017). From here, relying on the four most present foreign nationals – although in different degrees across the four countries - brings not just an overall picture of Muslims per se but also non-religious cultural factors (see Table 25 on p. 54). In sum, the appreciation of a specific form of church-state relation not solely depends on the institutionalised separation in the host country, but also on the essence of religion in the country of origin. Data from the PRC on both, government restrictions and social hostilities index - GRI and SHI respectively - provide insights as to the perceived relevance of religion under a certain regime and the occurrences of social hostilities related to religion.

	20	07	20	15					
	GRI	SHI	GRI	SHI					
Bosnia-Herzegovina	1.5	2.4	2.1	3.7					
Kosovo	1.9	2.4	3.2	3.8		20	07	20	15
Rep. of Macedonia	2.2	1.5	3.1	3.2		GRI	SHI	GRI	SHI
Slovenia	0.6	1.0	1.4	0.0	France	3.3	3.4	5.2	5.1
Croatia	0.7	2.0	1.4	0.3	The Netherlands	0.4	1.0	2.2	2.1
Serbia	3.1	1.5	3.0	0.9	The United Kingdom	1.6	1.6	2.2	6.0
Montenegro	0.9	2.4	2.9	2.7	Germany	3.1	2.1	3.7	5.3
Turkey	6.6	4.7	6.8	6.2					
Morocco	4.9	3.7	7.5	2.5					
Pakistan	5.8	8.9	6.2	7.2					

Table 23: Government restrictions- and social hostilities indexes (PRC, 2016b)<sup>3536</sup>

<sup>&</sup>lt;sup>35</sup> Retrieved from: <u>http://assets.pewresearch.org/wp-content/uploads/sites/11/2017/04/07154137/Appendix-C.pdf</u>

	Low	Moderate	High	Very high
GRI	< 2.3	2.3 - 4.4	4.4 - 6.5	6.5 - 10
SHI	< 1.4	1.4 - 3.5	3.5 - 7.1	7.1 - 10

The GRI is composed of a set of twenty indicative questions dealing with laws, policies and actions that restrict religious beliefs and practices in a respective country. The SHI is the outcome of a combined set of thirteen questions dealing with acts of religious hostility by private individuals, organisations or groups in a particular society<sup>3738</sup>. Such indicators primarily signify the essence of religion – however not specified which religion – in a particular country as well by governments as civil society actors. Concerning the host countries, France, the Netherlands, the United Kingdom and Germany, both indicators increased against the baseline year 2007. Such indicators can be interpreted differently forasmuch normative stances towards government restrictions, while social hostilities with religious motivations certainly imply – beyond normative positions – the role of religion in a particular society that indicates whether or not religion is a private matter, if state interference is ordinary, and the extent to which religious matters should be discussed publicly. I do not argue that there is – besides religious factors – a very profound association between non-religious cultural factors and ethnic groups' dominant opinion on the separation of church and state. However, it provides an interesting picture as the country of origin serves as one point of reference either for the better or worse.

Table 24. O	pinion on the s	anarotion of	aburah and	atota nor	othnia family
1 able 24. O	onnon on the s	edalation of (	Church and	state Der	eunine ranniny

	1 1	AGREE	1	NEITHER AGREE		DISAGREE	
		STRONGLY	AGREE	OR DISAGREE	DISAGREE	STRONGLY	Total
NATIVE ORIGIN	Count	83	214	309	466	421	1493
	% within ETHNIC GROUP	5,6%	14,3%	20,7%	31,2%	28,2%	100%
YUGOSLAVIAN	Count	93	174	112	171	101	651
	% within ETHNIC GROUP	14,3%	26,7%	17,2%	26,3%	15,5%	100%
TURKISH	Count	218	302	215	222	139	1096
	% within ETHNIC GROUP	19,9%	27,6%	19,6%	20,3%	12,7%	100%
MOROCCAN	Count	151	269	199	154	85	858
	% within ETHNIC GROUP	17,6%	31,4%	23,2%	17,9%	9,9%	100%
PAKISTANI	Count	69	148	163	202	108	690
	% within ETHNIC GROUP	10,0%	21,4%	23,6%	29,3%	15,7%	100%
Total	Count	614	1107	998	1215	854	4788
	% within ETHNIC GROUP	12,8%	23,1%	20,8%	25,4%	17,8%	100%

Source: (Hoksbergen & Tillie, 2016)

## Table 25: Estimates of ethnic family migrants per country

	Ex Yugoslavs <sup>39</sup>	Turks	Moroccans	Pakistani's
France	117.000	297.000	926.000	24.000
The Netherlands	28.000	200.000	172.000	12.000
The United Kingdom	32.000	101.000	24.000	540.000
Germany	556.000	1.656.000	115.000	50.000
	1	1	Sour	····· (MDI 2017)

Source: (MPI, 2017)

Muslims seem to be rather divided on the separation of church and state per ethnic family (see Appendix 7 on p. 130). Natives are even more critical towards the separation of church and state, especially in France. The essence of religion in relation to state authority is of importance for both ends of the spectrum. This because the state's relative legitimacy and perceived authority in providing for and protecting religious groups brings insights as to the overall practicalities that freedom of religion entails.

The analysis so far has shown some interesting signs. Discrepancies exist between en within countries in view of the matter of allowance of Muslims (ESS, 2014), for which much can be accounted to cultural traits. Perceived cultural distance between Muslims and cultural life, customs and traditions of host countries are the main concerns for natives (FRA, 2016; Kayaoglu & Kaya, 2012; Zick et al., 2011). Two indicators as to immigrants undermining cultural life and maintaining

<sup>&</sup>lt;sup>37</sup> See: <u>http://assets.pewresearch.org/wp-content/uploads/sites/11/2017/04/07154138/Appendix-D.pdf</u>

<sup>&</sup>lt;sup>38</sup> Results: <u>http://assets.pewresearch.org/wp-content/uploads/sites/11/2017/05/03104149/Appendix-E.pdf</u>

<sup>&</sup>lt;sup>39</sup> That is, Bosnia-Herzegovina, Kosovo, Rep. of Macedonia, Slovenia, Croatia, Serbia and Montenegro

own traditions and customs (EVS, 2016) points to a rather negative position of Germans towards immigrants compared to Dutch and French natives. Overall, the discursive trend on Islam and Muslims is the most negative in Germany, while for France, the Netherland and the United Kingdom more positive claims can be observed between 1999 and 2008, referring to the average position of claims. Also the mean tone of German state actors is rather negative, especially the judiciary and police and security agencies. Muslim organisations and groups are more actively involved in public debates in France and United Kingdom and significantly to a lesser extent in the Netherlands and Germany. Protest actions by civil society actors are rather often reported in French newspapers than in the other countries, particularly Germany. In Germany and the United Kingdom, state interventions are more often reported, not directly pointing to either partiality or neutrality, but it indicates its actorness more generally. For Islamic religious rights and forms of Islamophobia, institutional contexts are more contested than non-institutional spheres for both ends in all countries, except for Islamophobic claims in the United Kingdom where non-institutional forms receive more attention. The public debates in the Netherlands, France, and also the United Kingdom seem to use more generalising objects of claims. With regard to the role of religion in society and the opinions on the separation between church and state, no clear conclusion can be drawn per country neither per ethnic family. As Appendix 7 shows, natives can be considered as main opponents.

Surely, different institutional contexts, different actors, national events and the like provide different incentives for claim-making. However, as secularism is the product of emerging and growing momentum of reason over faith in nation-building times (Modood, 2016), epistemological and ontological consequences form the individual. That is to say that the disappearance of faith - as unifying factor - from the public sphere incites the moral disseminations. In other words, "[w]ith the death of God, Weber [1919] contends, our moral universe has lost its original unity and is shaken by a "polytheism of values" in which "the various spheres of the world stand in irreconcilable conflict with each other" (as cited in Mavelli, 2015, p. 191; Weber, 2009, p. 147). Max Weber, moreover, saw that "[t]he intellect has created an aristocracy based on the possession of [a secular] rational culture and independent of all ethical qualities of man" (Mavelli, 2015, p. 191). From there, the loss of a unifying principle and fragmentation of moral guidance not solely wiped away moral direction, but also triggered a plurality of moralities. Secularism, therefore, weakens identity, divides the public 'value spheres' and is thus problematic when a new religion knocks on the door. This seems somewhat paradoxical as secularism as oftentimes considered as some sort of protection mechanism for believers and non-believers. Privatised moral guidance inter alia means that the state acquired the standard setter status in the public sphere; "the state is bound to interact with religions but must do so governed not by religious principles but by the principles that the liberal-democratic state is independently committed to: equality, social justice, democracy" (Cohen & Laborde, 2016, p. 10). This challenge say synchronising the plurality of fragmentised moralities and principles as equality, social justice and democracy - is at the heart of presages on post-secularism (Habermas, Blair, & Debray, 2008). In sum, secularism forms individuals' personality in a practical-rational manner. For some it is not even too farfetched to relate Islamophobia directly to secularism, although the public sphere is arguably guided by splintered notions of equality, social justice and democracy.

#### Forms of and numbers on Islamophobia

Islamophobia is a hard to measure construct for many reasons (see Bleich, 2011, pp. 1588-1594). Islamophobia or anti-Muslims sentiments are on the rise in the West (Cesari, 2011; Ciftci, 2012). Kalin (2011) "argues that Islamophobia is a product of Western Liberal mind set confined to a narrow understanding of secularization that cannot accommodate another religion like Islam. As such, he argues that anti-Muslim sentiments are related to the limits of pluralism and multiculturalism in the West" (Ciftci, 2012, p. 294). This mind-set suggests that we need to differentiate between attitudinal and behavioural forms of Islamophobia, ranging from conceptual stretching to the various reasons of hesitance when it comes to reporting on such phenomena. The bifurcation as to attitudinal and behavioural forms of Islamophobia is therefore fruitful insofar that behavioural Islamophobia is oftentimes a matter of perception. It is exactly this grey area that complicates matters, as reported in *the Second European Union Minorities and Discrimination Survey*; issuing data on perceived

behavioural Islamophobia. The Second European Union Minorities and Discrimination Survey (FRA, 2016) "provide[s] key data to support a wide range of measures in the areas of integration and nondiscrimination" (European Commission, 2017, n.p.). It also foresees biases – both, in methodological and practical sense – as to the racialisation of Islamophobia; the generalisation is based not solely on religious beliefs, but also on ethnicity, immigrants background and skin colour. This report therefore issues data on the controversial concept that Islamophobia is. This report's relevance thus brings conceptual complexities, but more importantly issues data on the societal implications of Islamophobia.

Its overall observations and conclusions are critical insofar that current trends lack progress in tackling hate crimes and overall discrimination since 2008 (FRA, 2009). Behavioural Islamophobia links "discrimination, harassment and violence can undermine positive attitudes and hinder meaningful participation in society" (FRA, 2016, p. 3) and the vicious circle it triggers. Trends, especially when it comes to finding a job, discrimination at the workplace, frequent police stops or the accessibility to public or private services, are spheres of contestation. Muslims seem to be strongly attached to their country of residence; they tend to trust countries' public institutions more so than the general population. Nevertheless, a lack of knowledge, awareness of - or trust in - complaints mechanisms and law enforcement due to imminent 'second victimization' (Best, 1997) can bring vicious circular effects. Some respondents even reported to be harassed or discriminated against by the police, another organisation or service, or even by an equality body, human rights institution. One in three Muslims indicate to suffer from discrimination when looking for a job; one in four experienced harassment based on ethnic or immigrant background of which the half suffered six or more of such incidents during a year; religious symbols and clothing increase the chance of discrimination, harassment or police stops. Many Muslims without residence permit believe that citizenship is a source of discrimination, particularly in education, housing market, job market and health care. Muslims without residence permit or with residence permit valid for less than five years embody a category an sich, as it indicates individuals' political participation and emotional attachment, and so the rationalisation and emotionalisation of opportunities. Motivations of naturalisation are numerous: access to rights, residence security, less obstacles when travelling, acknowledgement and acceptance, less bureaucratic obstacles, and social opportunities e.g., the job market. The report moreover issued that 39% of Muslim respondents felt discriminated against based on ethnicity, immigrant background, skin colour or religious belief during the five years preceding EU-MIDIS II. As to France, the Netherlands, the United Kingdom and Germany, respondents – self-declared Muslim – consist of the following demographic characteristics:

	Origin	Code: N	Total
France	North Africa	NOAFR: 749	1057
	Sub-Saharan Africa	SSAFR: 308	
The Netherlands	North Africa	NOAFR: 641	1245
	Turkey	TUR: 604	
The United Kingdom	South Asia	SASIA: 595	710
	Sub-Saharan Africa	SSAFR: 115	
Germany	Sub-Saharan Africa	SSAFR: 101	940
	Turkey	TUR: 839	

Islamophobia is a problematic phenomenon to measure for various reasons, primarily due to its stretched conceptualisations throughout the years, behavioural and attitudinal forms, and different perceptions thereof. The racialisation of Islamophobia is one of the prime reasons of its increasing width, usage and so resonates very well. Consequently, Muslims believe that discrimination not solely occurs on grounds of religion, but also ethnic origin and skin colour incite discrimination. If Islamophobia is an institution – that is, a reoccurring pattern of behaviour – ethnic origin and skin colour are indeed determinants which are to be observed prior one's religious beliefs in the absence of any visible religious symbol and therefore constitute to the unfounded respect. For the question: "for each of the following types of discrimination, could you please tell me whether, in your opinion, it is very rare, fairly rare, fairly widespread, or very widespread in [COUNTRY]?" (FRA, 2009, p. 40),

huge discrepancies could be observed between France and the Netherlands on the one side, and the United Kingdom and Germany on the other.

Table 26: Occurrences of discrimination	Type of discrimination	Fairly or very widespread
France	Skin colour	66%
	Religion/religious beliefs	75%
	Ethnic origin/immigrant background	71%
The Netherlands	Skin colour	62%
	Religion/religious beliefs	72%
	Ethnic origin/immigrant background	73%
The United Kingdom	Skin colour	38%
	Religion/religious beliefs	47%
	Ethnic origin/immigrant background	40%
Germany	Skin colour	31%
	Religion/religious beliefs	44%
	Ethnic origin/immigrant background	38%

A closer look to state specific trends as to perceived behavioural Islamophobia concentrates on type of grounds, areas of daily life and the origin categories (FRA, 2016).

Table 27: Perceived forms of behavioural Islamophobia in per country

Perceived form of behavioural Islamophobia	France	The Netherlands	The United Kingdom	Germany
Muslims without residence permit or with	17%	2%	7%	4%
residence permit valid for less than five years				
"On a scale from 1 to 5 where 1 equals 'not at	4.3	3.4	4.3	4.0
all attached' and 5 'very strongly attached',				
please tell me to what extent do you feel				
attached to [COUNRTY]?"				
Discrimination based on the three specific	sc: 14%	sc: 9%	sc: 8%	sc: 3%
grounds <sup>40</sup> in the past five years in four areas of	rb: 20%	rb: 30%	rb: 9%	rb: 16%
<i>daily life</i> <sup>41</sup>	eo: 35 %	eo: 42%	eo: 10%	eo: 17%
of which in the last five year	NOAFR: 46%	NOAFR: 65%	SASIA: 22	SSAFR: 65
	SSAFR: 50%	TUR: 59%	SSAFR: 17	TUR: 33
"Last time you felt discriminated against	11% yes	25% yes	13% yes	12% yes
because of your ethnic or immigrant				
background at [looking for work, at work,				
education, healthcare, housing, and other				
public or private services]; did you report or				
make a complaint about the incident?"				
"Do you know any organization in	NOAFR: 32%	NOAFR: 30%	SASIA: 30%	SSAFR: 23%
[COUNTRY] that offers support or advice to	SSAFR: 28%	TUR: 28%	SSAFR: 22%	TUR: 25%
people who have been discriminated against -				
for any reason?"				
"Have you ever heard of [name of equality	31%	47%	45%	34%
body]?"				
"As far as you are aware, is there a law in	NOAFR: 79%	NOAFR: 78%	SASIA: 80%	SSAFR: 71%
[COUNTRY] that forbids discrimination based	SSAFR: 81%	TUR: 70%	SSAFR: 73%	TUR: 64%
on skin colour, ethnic origin or religion?"				
Prevalence of harassment due to ethnic or	NOAFR: 32%	NOAFR: 40%	SASIA: 13%	SSAFR: 48%
immigrant background during the last year?	SSAFR: 24%	TUR: 37%	SSAFR: 15%	TUR: 23%

 <sup>&</sup>lt;sup>40</sup> Skin colour (sc), religion/religious beliefs (rb), ethnic origin/immigrant background (eo)
 <sup>41</sup> Looking for work, at work, education, housing

"In the past five years in [COUNTRY] (or since you have been in [COUNTRY]), have		NOAFR: 21% TUR: 12%	SASIA: 7% SSAFR: 5%	SSAFR: 21% TUR: 5%
you ever been stopped, searched and		1 OK. 1270	557 H R. 570	1010.570
questioned by the police?"				
"Do you think that THE LAST TIME you	NOAFR: 34%	NOAFR: 64%	SASIA: 0%	SSAFR: 47%
were stopped was because of your ethnic or	SSAFR: 51%	TUR: 43%	SSAFR: 48%	TUR: 16%
immigrant background?"				
Trust in the police on a 0-10 scale (where 0	NOAFR: 6.0	NOAFR: 5.1	SASIA: 6.6	SSAFR: 6.7
means 'no trust at all' and 10 means 'complete	SSAFR: 5.8	TUR: 4.9	<b>SSAFR: 7.4</b>	TUR: 7.5
trust')				

Source: (FRA, 2016)

The term Islamophobia is a trap<sup>42</sup> for some, as the term conflates outsiders' beliefs about an abstract noun, namely Islam and attitudes to real people, namely Muslims. Academics warn for the accompanying threats of using 'Islamophobia' as it is a derogatory term in nature, but is widely used for legitimate, secular and enlightened critique, which in fact censor debate, retain from bridgebuilding and foster stigmatisation (see Kunst, Tajamal, Sam, & Ulleberg, 2012). Likewise, the term is used as an "expendable neologism that merely describes a rather well-known phenomenon of prejudice and discrimination against immigrants (particularly from Muslim countries). The other, more intransigent, objection denounces Islamophobia as a discursive weapon intended to silence welljustified critique of Islamic practices and dogmas" (Imhoff & Recker, 2012, p. 4). Even if Islamophobia is considered as a discourse, one must still bear in mind that rejecting Islamic religious practices or referring to any kind of non-discriminatory selection does not necessarily stems from phobia or fear.

As to attitudinal Islamophobia, one must remember that the absence of a legal definition of Islamophobia on the one hand, and some sort of conscious normative fields where the phenomenon embodies varying levels of controversy on the other, makes it hard to measure. Whereas behavioural Islamophobia is primarily a perceived reality in that this grey area does not encompass a list of necessary or sufficient conditions which ought to be met in order to speak about an Islamophobic act. Moreover, measuring behavioural Islamophobia is biased by opposing actors' perceptions. Attitudinal Islamophobia has problematic features too, especially forasmuch the extent and width of prejudice. In other words, in which normative fields is prejudice - as precedent for exclusion, discrimination and even violence - a sufficient condition for defining an as attitude Islamophobic? The three most theories used to describe ethnic or religious intolerance and racism - all based on 'in-group' 'outgroup' rationales - are based on perceived realistic and symbolic threats, and social identity. Shorty, the realistic threat theory focuses on perceived threats to – be it materially, economically or physically - the 'in-group' (Quillian, 1995). Especially in times of economic deprivation and scarcity of resources as jobs, education and welfare provisions, such threats are perceived to a greater extent, at least hypothetically. Likewise, physical threat perceptions are fuelled by terrorist events, inciting a 'Bin Laden effect' (Cesari, 2004). Symbolic threat theory foresees when numbers of 'out-groups' grow, the perceived threat to 'in-groups'' cultural and national values grow. It seems that nationals in all four countries believe that the number of Muslims residing in their country is higher than the actual numbers (Hackett, 2016). It are the visible aspects – or 'Virtual Islam' (Berger, 2013) – that carry such sentiments. Lastly, social identity theory; the stronger the sense of the 'in-group' the more negative is the position towards an 'out-group', which can be national identity-driven, but also religious and ethnic. With regard to the level of analysis problem – linking micro to macro observations – cognitive capabilities are eliminated by large-N studies. This is essential as "attitudes about different ethnic groups are more likely to be negative at low levels of education and knowledge" (Ciftci, 2012, p. 297), that is, cognitive simplification and generalisations is what follows. The Pew Research Center (PRC) Spring 2016 Survey Data provides two indicative questions on attitudinal Islamophobia in a rather general way: Q36c. I'd like you to rate some different groups of people in [country] according to how you feel about them. Please tell me whether your opinion is very favourable, mostly favourable, mostly unfavourable or very unfavourable. [on Muslims].

<sup>&</sup>lt;sup>42</sup> Mail correspondence with Mohammed Amin (chairman of The Conservative Muslim Forum)

		Very	Mostly	Mostly	Very	Don't know	Refused (do	
		favourable	favourable	unfavourable	unfavourable	(do not read)	not read)	Total
France	Count	161	517	201	79	28	13	999
	Expected Count	119,0	529,5	201,9	81,3	48,2	19,0	999
	% within Country	16,1%	51,8%	20,1%	7,9%	2,8%	1,3%	100%
Netherlands	Count	64	561	234	82	38	20	999
	Expected Count	119,0	529,5	201,9	81,3	48,2	19,0	999
	% within Country	6,4%	56,2%	23,4%	8,2%	3,8%	2,0%	100%
United Kingdom	Count	214	722	239	153	101	31	1460
-	Expected Count	173,9	773,9	295,1	118,9	70,4	27,8	1460
	% within Country	14,7%	49,5%	16,4%	10,5%	6,9%	2,1%	100%
Germany	Count	92	563	227	49	48	21	1000
	Expected Count	119,1	530,1	202,1	81,4	48,2	19,1	1000
	% within Country	9,2%	56,3%	22,7%	4,9%	4,8%	2,1%	100%
Total	Count	531	2363	901	363	215	85	4458
	Expected Count	531,0	2363,0	901,0	363,0	215,0	85,0	4458
	% within Country	11,9%	53,0%	20,2%	8,1%	4,8%	1,9%	100%
				-		(PI	$2C_{2016a}$	

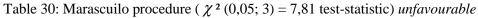
Table 28: Attitudes on Muslims in France, the Netherlands, the United Kingdom and Germany

(PRC, 2016a)

For all four countries, nationals are generally 'mostly favourable'. At the same time, however, reasonable shares have answered 'mostly unfavourable', which paints a complex picture in all four countries. This conclusion can also be drawn from the Marascuilo procedure, as there is no significant difference between any possible pair of countries, either for the 'favourable answer category' and 'unfavourable answer category'.

Pairs	Paired proportions	Absolute difference	Critical range	Significant
$P^{\text{FR}}-P^{\text{NL}}$	0,679 - 0,626	0,053	0,0595	No
$\mathbf{P}^{\text{FR}} - \mathbf{P}^{\text{UK}}$	0,679 - 0,642	0,037	0,0542	No
$P^{\text{FR}} - P^{\text{GER}}$	0,679 - 0,655	0,024	0,0589	No
$\mathbf{P}^{\mathrm{NL}} - \mathbf{P}^{\mathrm{UK}}$	0,626 - 0,642	0,016	0,0553	No
$P^{\text{NL}} - P^{\text{GER}}$	0,626 - 0,655	0,029	00599	No
$P^{\rm UK} - P^{\rm GER}$	$0,\!642 - 0,\!655$	0,013	0,0547	No

 $(\alpha = 0.05)$ 



Pairs	Paired proportions	Absolute difference	Critical range	Significant
$P^{\text{FR}}-P^{\text{NL}}$	0,280-0,316	0,036	0,0571	No
$P^{\text{FR}}-P^{\text{UK}}$	0,280 - 0,269	0,011	0,0513	No
$P^{\text{FR}} - P^{\text{GER}}$	0,280 - 0,276	0,004	0,0560	No
$\mathbf{P}^{\rm NL} - \mathbf{P}^{\rm UK}$	0,316 - 0,269	0,047	0,0526	No
$\boldsymbol{P}^{NL} - \boldsymbol{P}^{GER}$	0,316-0,276	0,04	0,0570	No
$\mathbf{P}^{\mathrm{UK}} - \mathbf{P}^{\mathrm{GER}}$	0,269 - 0,276	0,007	0,0514	No
				$(\alpha = 0,05)$

Likewise, a 'symbolic threat theory' question was asked, namely: Q71. Do you think most Muslims in our country today want to adopt [survey country]'s customs and way of life or do you think that they want to be distinct from the larger [survey country nationality] society?

		Adopt	Want to be	Both (do not	Don't know	Refused (do	
		customs	distinct	read)	(do not read)	not read)	Total
France	Count	454	484	24	36	1	999
	Expected Count	365,0	541,9	30,5	56,0	5,6	999
	% within Country	45,4%	48,4%	2,4%	3,6%	0,1%	100%
Netherlands	Count	437	513	22	26	1	999
	Expected Count	365,0	541,9	30,5	56,0	5,6	999
	% within Country	43,7%	51,4%	2,2%	2,6%	0,1%	100%
United Kingdom	Count	422	823	59	140	16	1460
	Expected Count	533,5	791,9	44,5	81,9	8,2	1460
	% within Country	28,9%	56,4%	4,0%	9,6%	1,1%	100%
Germany	Count	316	598	31	48	7	1000
	Expected Count	365,4	542,4	30,5	56,1	5,6	1000
	% within Country	31,6%	59,8%	3,1%	4,8%	0,7%	100%
Total	Count	1629	2418	136	250	25	4458
	Expected Count	1629,0	2418,0	136,0	250,0	25,0	4458
	% within Country	36,5%	54,2%	3,1%	5,6%	0,6%	100%

Table 31: Attitudes on Muslims' way of life in the four countries

(PRC, 2016a)

Table 32: Marascuilo procedure ( $\chi^2(0,05; 3) = 7,81$  test-statistic) adopt customs

Pairs	Paired proportions	Absolute difference	Critical range	Significant
$P^{\text{FR}} - P^{\text{NL}}$	$0,45\dot{4}-0,437$	0,017	0,0621	No
$P^{\text{FR}} - P^{\text{UK}}$	$0,\!454 - 0,\!289$	0,165	0,0554	Yes
$P^{\text{FR}} - P^{\text{GER}}$	$0,\!454 - 0,\!316$	0,138	0,0602	Yes
$\mathbf{P}^{\mathrm{NL}} - \mathbf{P}^{\mathrm{UK}}$	0,437 - 0,289	0,148	0,0553	Yes
$\boldsymbol{P}^{NL} - \boldsymbol{P}^{GER}$	0,437 - 0,316	0,121	0,0601	Yes
$\mathbf{P}^{\mathrm{UK}} - \mathbf{P}^{\mathrm{GER}}$	0,289 - 0,316	0,027	0,0531	No
	-	-		$(\alpha = 0,05)$

Here, some cross-national differences can be observed. In both, France and the Netherlands, there is a more profound perception that Muslims want to adopt native customs than in the United Kingdom and Germany; the absolute differences between these two groups of countries – France and the Netherlands on the one side, and the United Kingdom and Germany on the other – exceed the critical ranges when paired proportions are compared.

Table 33: Marascuilo procedure ( $\chi^2(0,05; 3) = 7,81$  test-statistic) want to be distinct

Pairs	Paired proportions	Absolute difference	Critical range	Significant
$P^{\text{FR}} - P^{\text{NL}}$	0,484 - 0,514	0,030	0,0625	No
$\mathbf{P}^{\text{FR}} - \mathbf{P}^{\text{UK}}$	$0,\!484 - 0,\!546$	0,062	0,0576	Yes
$P^{FR} - P^{GER}$	$0,\!484 - 0,\!598$	0,114	0,0619	Yes
$\mathbf{P}^{\mathrm{NL}} - \mathbf{P}^{\mathrm{UK}}$	0,514 - 0,546	0,032	0,0576	No
$\mathbf{P}^{\mathrm{NL}} - \mathbf{P}^{\mathrm{GER}}$	0,514 - 0,598	0,084	0,0619	Yes
$P^{\rm UK} - P^{\rm GER}$	0,546 - 0,598	0,052	0,0569	No
				$(\alpha = 0,05)$

Here, we observe a somewhat similar picture. For both forms of Islamophobia, attitudinal and behavioural, no clear cross-national trends can be observed or conclusions can be drawn as to the religious factor. Moreover, the 'unfoundedness' of any form of discriminatory thoughts or practices is a problematic feature. Nevertheless, the consequences of perceived Islamophobia cannot be ignored, but suffer from speculative truths. Still, "the media representation of Muslims and Islam has clearly been negative in the recent past. It has been quite noticeable that this negative representation has

heavily been describing issues of political and security nature (see Field, 2007; Mescher, 2008; Poole, 2006; Saeed, 2007; Said, 2008) and that increased media coverage of terrorism following 9/11 episode increases threat perceptions, without sufficiently affecting the individual schema (cognitive) and beliefs (affective)" (Iqbal, 2010, p. 587). Likewise, if Noelle-Neumann's (1993) thesis on the '*spiral of silence*' is valid (Noelle-Neumann, 1993), those who fear Islam are more likely to voice their concerns in our post 9/11 era. This means that individuals try to obviate irrational behaviour and seek for positivistic and legitimate support in one's environment instead. Therefore sorts of relative deprivation (Franz, 2007) and – albeit realistic or symbolic – security threats incite segregation in which religion plays a perceptual and ambiguous role.

b. Interpretations in relation to the theoretical framework

The pivot of this search is the combination of discursive opportunity structure's main elements and the demarcated spheres of group demands for Islamic religious practices and counteracting Islamophobia. Arguably, the two ends of the same interactive spectrum between non-Muslim majority and Muslim minorities are suggested in order to better understand how both non-heterogeneous groups either publicly align or oppose one another. As proposed earlier, the fundamental mechanisms that undergird the discursive realm are speculative. The degree in which Islamic religious practices are accommodated have changed across the four selected across during the last decades (Tillie et al., 2013); the 'Muslimness' of Muslims is subjected to change, even within countries over time. The discursive realm informs all actor categories, however the eventual objective to institutionalise the allowance of specific Islamic religious practices on the one hand, and petering out Islamophobia on the other, requires different strategies within different discursive relations.

As to the institutional opportunity structure, the extent to which Islamic religious practices are institutionalised – and thus allowed – is shown in Table 36. Having such institutional pillars and claims in the discursive realm concerning those and related Islamic religious practices enables us to observe trends. In other words, observing the institutional provisions concerning Islamic religious practices point to the extent in which Muslims can practise their religion, as to the different degrees of allowance of such practices. Moreover, the general position as to group demands for Islamic religious practices from non-Muslim actor categories suggests the presence or absence of discursive opportunity windows. This institutional playing field in which Muslims find themselves function as points of reference, that is to say that specific religious practices are accommodated or restricted in such a way that provokes contestation from certain actor categories. An overall overview of claims concerning Islamic religious practices is given below, pointing to visibility and contestation. This overview simply indicates which Islamic religious practices are contested in the discursive realm by the concentration of claims per country.

Table 34: Number of claims per Islamic religious rights category per country	FRA	NL	UK	GER	Total
Allowance of Islamic ritual slaughtering				2	15
ခ Allowance of Islamic call to prayer	0	1	2	3	6
Right to build (visible) mosques	49	12	7	48	116
Õ Right to build minarets	2	2	1	2	7
Provision for burial according to the Islamic rite	1	0	3	3	7
Rights regarding the establishment and running of Islamic schools	9	39	7	1	56
Islamic religious classes in state schools	0	10	1	33	44
Rights related to wear headscarf hair-covering headgear for female students	40	13	9	4	66
Brights related to wear headscarf hair-covering headgear for teachers	1	1	1	41	44
Rights related to wear <i>burqa</i> or <i>niqaab</i> hair and face-covering headgear for female students	2	7	8	7	24
Rights related to wear burqa or niqaab hair and face-covering headgear for teachers	0	0	10	1	11
Islamic religious programs in public broadcasting	2	1	0	2	5
Imams in army and prisons	3	0	1	0	4
Total	116	89	53	147	405
Source (M. Cineri & Danfi 2011)					

Source: (M. Giugni & Banfi, 2011)

The above listed Islamic religious practices resonate differently across France, the Netherlands, the United Kingdom and Germany. I foresee that institutional provisions can be considered as independent determinants and function as points of reference. Primarily via dissatisfaction through rationalisation and emotionalisation with the status quo, this incites evaluative claims, either via advocating or disclaiming specific rights by all actor categories. Table 35 shows the average position of claims forasmuch Islamic religious practices.

Table 55: Average position of claims towards Islamic religious practices per court	ury			
Outside	FRA	NL	UK	GER
Allowance of Islamic ritual slaughtering	0.437	$0^{3}$	$0^{3}$	$-0.5^2$
Allowance of Islamic call to prayer	00	$0^1$	$0^2$	$-0.67^3$
Right to build (visible) mosques	$0.47^{49}$	$-0.25^{12}$	$0.29^{7}$	$0.17^{48}$
Right to build minarets	$0^2$	$-1^2$	$1^{1}$	$-0.5^{2}$
Provision for burial according to the Islamic rite	$1^{1}$	$0^0$	$0.67^{3}$	$1^{3}$
Inside				
Rights regarding the establishment and running of Islamic schools	$0.44^{9}$	0.13 <sup>39</sup>	$0^7$	-1 <sup>1</sup>
Islamic religious classes in state schools	$0^{0}$	$0.5^{10}$	$0^1$	$0.12^{33}$
Rights related to wear headscarf hair-covering headgear for female students	0.1340	-0.31 <sup>13</sup>	$0.22^{9}$	$-0.5^4$
Rights related to wear headscarf hair-covering headgear for teachers	$0^1$	-1 <sup>1</sup>	$1^{1}$	$0.02^{41}$
Rights related to wear burga or niqaab hair and face-covering headgear for female students	$-0.5^2$	0.437	0.13 <sup>8</sup>	$-0.71^7$
Rights related to wear burga or niqaab hair and face-covering headgear for teachers	00	$0^0$	$0.2^{10}$	-1 <sup>1</sup>
Islamic religious programs in public broadcasting	$0.5^{2}$	$1^{1}$	$0^0$	$0^2$
Imams in army and prisons	$0.67^{3}$	$0^{0}$	$1^{1}$	$0^{0}$

# Table 35: Average position of claims towards Islamic religious practices per country<sup>43</sup>

Table 36: Institutional allowance of Islamic religious practices as to 2008<sup>44</sup>

restrictive	unaccommodating	moderate	unres	trictive	accon	nmodating	5
1	2	3		4		5	
Islamic religiou	us practices outside of	public institutions	FRA	NL	UK	GER	_
Ritual slaughte	ring		5	3	5	3	
Call to prayer			1	5	5	3	
Mosques with	minarets		3	5	5	5	
Separate burial	sites		5	3	5	3	
Burial without	Burial without coffin			5	3	3	
Islamic religiou	Islamic religious practices inside of public institutions						
Islamic (state)	schools		1	5	3	2	
Islamic classes	in state schools		1	3	3	3	
State funding s	chools		1	5	4	2	
Student headsc	arves		1	5	5	5	
Teachers heads	Teachers headscarves			5	5	3	
Islamic public	Islamic public broadcast			5	5	1	
Imams in priso	n		5	5	5	3	
Imams in the m	nilitary		5	5	5	2	
mans in the mintary				(Tillie e	t al., 2013	3, pp. 44-4	6)

(Tillie et al., 2013, pp. 44-46)

The institutional determinants and discursive trends per Islamic religious practice provide indications as to the two main sources of opportunity windows, say formal and informal ones. Social movements are embedded in their time and culture. Their subjected position within "a certain structure of knowledge and basic modes of thinking" (Baumgarten & Ullrich, 2016, p. 5) implies that the generated 'regime of truth' does not necessarily have to be reflected on a conscious level. As revelation played a significant role in defining the essence of religion in state affairs (see Mavelli, 2013), one might state that everything that cannot be rationalised, cannot be controlled. This is not to say that everything that can be controlled must be fully rational, as politics - especially in extraparliamentary domains – is as much a matter of emotionalisation (Bröer & Duyvendak, 2009).

For France, ritual slaughter is not really a contested matter, as it is institutionalised insofar that it is allowed as parity religious practice since Jewish denominations also prefer halal or kosher meat. Therefore, it is not surprisingly that ritual slaughter discursively, receives generally positive reactions since it is practised outside public institutions. Islamic calls for prayers are forbidden in France and no

<sup>43</sup> See Appendix 12 on p. 142

<sup>&</sup>lt;sup>44</sup>/sites/default/files/u262/icri\_indicators\_29\_countries\_worldwide\_xlsx via (WZB, 2017)

claim was issued in any of the five most popular newspapers in France for the time period of 1999-2008, pointing to a rather undisputed subject-matter. Sometimes the institutionalisation of religious practices is constrained by practicalities rather than ideological motivations. With regard to building mosques with minarets, France is restrictive comparatively, while there are quite some positive claims to be observed. France counts approximately 2.400 mosques (Dandrieu, 2014), but explicit data about how many Muslims per denomination are served by its services is unclear. The building of mosques with minarets can be considered as parity right insofar churches and synagogues function too as houses of worship where religious gatherings are celebrated privately. Concerning the provision for burial according to Islamic rite, funeral services in France do provide for separate burial sites, but further customs are forbidden until the present day. Turning to Islamic religious practices inside public institutions, France allows imams in the military. Further, any religious symbols in public institutions are well-known taboo. Considering those restrictions as some sort of baseline, we see a somewhat more positive discursive realm as only claims concerning the rights related to burga or niquab hair and face-covering headgear for female students received a negative average score. As claims on rights related to wear headscarf hair-covering headgear for female students seem to be the most contested issue – and to some lesser extent claims regarding the establishment and running of Islamic schools – the absence of any parity right but still a positive average score, suggest that contestation is the product of the least perceived resistance. In other words, rationalisation – and possibly other countries' institutionalised allowance - triggers claims.

Ritual slaughtering is allowed in the Netherlands, but contested for several years now. Discussions primarily centre on minimalising animal suffering and Muslim organisations' and slaughterhouses' demand and supply sides respectively, in national context so that animals do not suffer unnecessarily. It is therefore a little surprising that while some contestation persist on the formal level (NRC, 2016; Tillie et al., 2013, p. 44), not many statements were issued in the newspapers between 1999 and 2008. With regard to visible mosques - typically with minarets - a negative discourse can be observed for a parity right. There are about 475 mosques in the Netherlands (Van Oudenhoven, 2008, p. 62), of which some are placed in old school buildings or garages. The main discussions focus on location, practicalities such as parking spots and of course the visible aspect of such prayer houses and whether it fits in specific scenes and neighbourhoods or not. Practicalities like the devaluation of houses are frequently heard arguments against the building of mosques. Many of the religious practices inside public institutions embody parity group rights – as the fundaments of the Dutch pillarisation subsists - given Christian and Jewish precedents. Especially concerning Islamic religious schools which are relatively widespread in the Netherlands due to "its constitutional 'freedom of education' (which allows state-funded religious schools), its voucher system (each school receives the same amount of money per pupil) and school choice by parents" (Dronkers, 2016, p. 6). If Islamic religious schools are allowed via those three pillars, Islamic religious classes in state schools might be less of a necessity for Muslim youth, but might be beneficial for educating non-Muslim students. From there, claims related to Islamic classes in state schools are interesting; as not many Muslim actors issue statements, while the overall discourse seem rather positive towards this provision. When it comes to female students wearing a headscarf, a burga or niquab, more contestation can be observed than for female teachers. This can be explained by visibility and numerous concerns, but maybe more importantly the targeted generation for assimilation and integration ideals.

The overall average position of claims is the most positive in the United Kingdom. Not many statements for group rights outside public institutions are contested and thus published in the United Kingdom; many practices are allowed. The building of new mosques is relatively contested in all four countries. Absolute numbers, however, – there are about 1.700 mosques in the United Kingdom (I. Bowen, 2014) – do not suffice in ascertaining the need for more mosques, albeit visible ones or not. However, for burial ceremonies according to the Islamic rite, which is not maximally accommodated in the United Kingdom yet, some group demands can be expected. Even though there is no explicit law that stipulates that the deceased body must be buried in a coffin, quite some cemeteries adhere to traditions so that dead bodies must be covered while in-earthed. There are twenty-eight Islamic state schools in the United Kingdom, which is disproportionately small and therefore the demand for more is rising (Coughlan, 2016), but not solely in the form of a parity groups right. The existence of numerous private Islamic schools – and thus less scrutinised by public agencies – however, makes it a

subject matter that goes beyond religious education and shifts to segregation, radicalisation and extremism<sup>45</sup>. With regard to Islamic religious classes in state schools, not much contestation can be observed. In this respect, the United Kingdom maintains a completely different approach than France. Whereas the French *laïcité* flows through its education system as no Islamic state schools and Islamic classes are allowed, schools in the United Kingdom usually hold very strong ties with – mainly Christian – religious groups. At the same time, such schools incorporate easily pupils of other religious denominations, which points to the race-centeredness (Modood, 2016) and the position of education in integration strategies. The United Kingdom and the Netherlands are very accommodating when it comes to headscarves for female students and teachers. It is therefore not surprisingly that in both countries rights related to *burqas* and *niqaabs* are contested, relatively positive even though such group rights embody exceptional traits.

Germany's institutional provisions are characterised by the 'middle-way', that is, moderate levels of allowance can partially be explained by the fact that Germany is a constitutional federation. Islamic ritual slaughtering is allowed in accordance with German Basic Law and can be considered as parity right. There are, however, some marginalia, especially when it comes to permission of nostunning. "Germany gives no-stunning permissions to abattoirs, but only if they show they have local religious customers for the request. Very few are in fact given. However, it imports no-stunning meat from Belgium, France and Poland" (Needham, 2012, p. 6). A crucial reason for abolishing the ban on ritual slaughter in 2002 can be traced back to the essence of personal contact between butcher and consumer so that a trustful relation flourishes. This was impossible due to the importation halal food from other countries, and so whether religious prescriptions were adhered was uncertain (Zoethout, 2013). The call for prayer is allowed in certain Bundesländern, but receives quite some opposition. The prospect of country-wide allowance for all between circa 2.200 (Fetzer & Soper, 2005) and 3.000 mosques in Germany (Economist, 2016) can be considered – next to headscarves, burgas and nigaabs - as one of the main concerns for those who fear the Islamisation of Europe. Dealing with the death is entwined with culture: "[t]he fact is that about 90 per cent of Muslims (mostly Turks) who die in Germany are buried abroad because Germany requires a coffin and other non-Muslim conditions for burial" (Flippo, 2017). In addition to Germany's strictly regulated funeral industry, the costs of dying in Germany are very high. As burial customs do not touch upon public institutions and have no significant visible effects, one might expect some opportunities here even with the absence of an equivalent precedent right. The right for female teachers to wear a headscarf is the ultimate example of a contested subject-matter, as it involves a demarcation between religious freedom and employers' assessment of its possible practical effects, the public institution of education and a visible religious symbol without any equivalent precedent. Controversy is also highlighted by the nineteen anti- and twenty pro- claims. Moreover, as "[t]he Court recognized [...] that given the religious diversity of present-day society, a teacher's headscarf could yield conflicts and thus endanger educational peace" (Lettinga & Saharso, 2014, p. 34), eight Bundesländer have imposed restrictions on religious symbols for teachers pointing to diverse conceptions in Germany. Overall, Muslims experience different playing fields and windows of opportunity differ among France, the Netherlands, the United Kingdom and Germany. First and foremost, the differences in numbers between countries points to the overall contestation that persists within different societies with regard to Islamic religious practices, that is, low visibility means inert contestation. Moreover, in all countries but France, Islamic religious practices inside public institutions are more discussed and carry oftentimes - except for the Netherlands - restrictive stance and thus are subjected to more negative tones than claims on Islamic religious practices outside public institutions.

		-1		0			0	+1		Total	
	Outside	Inside	Σ	Outside	Inside	Σ	Outside	Inside	Σ	Average	Ν
FRA	6	14	20	20	18	38	33	25	58	0,328	116
NL	9	22	31	5	19	24	4	30	34	0,034	89
UK	4	1	5	3	28	31	9	8	17	0,226	53
GER	22	45	67	7	3	10	29	41	70	0,020	147

Table 37a: The average position of claims concerning Islamic religious practices

<sup>45</sup> As the 'Trojan Horse' plot incited: <u>http://www.bbc.com/news/uk-england-birmingham-28370552</u>

	Islam	ic religiou	us practice	es outside	public institutions	Islamic religious practices inside public institutions						
	-1	0	+1	Ν	Average position	-1	0	+1	Ν	Average position		
FRA	6	20	33	59	0.458	14	18	25	57	0.193		
NL	9	5	4	18	-0.278	22	19	30	71	0.113		
UK	4	3	9	16	0.313	1	28	8	37	0.189		
GER	22	7	29	58	0.121	45	3	41	89	-0.045		

Table 37b: The average positions concerning Islamic religious practices in relation to public institutions

Publicly discussing religious rights in secular contexts, however oftentimes deviates from simple parity-exceptional rights frames, since overlapping topics ranging from perceived cultural distance and culture preservation to practicalities as public order gather momentum. In other words, the arguments for either advocating or opposing can be framed differently between and within countries.

If we turn to the Islamophobia-side of the spectrum, we see indeed that the category of 'Islamic extremism and violence' is one form of fear that is mostly discussed, especially in the United Kingdom and Germany. Islamophobia has many ambiguities ranging from conceptual stretching and so the essence of necessary and sufficient conditions to behavioural, attitudinal and perceptual concerns. We also observe relatively many claims concerning the 'stigmatisation of minorities 'Muslim' 'Islam' in public debate' of which many entails pro-Islam/Muslim or anti-Islamophobic tones in all four countries (see Appendix 13 on p. 143). The beginning of the century is characterised by numerous terrorist attacks, definitely shifting the discourse (Franz, 2007; Tillie et al., 2013), as a matter of resonance. Comparing cultural rights and participation framed as *religion* and the main form of phobia related to Islam - Islamic extremism and violence - with an eye on the objectification of claims provides an interesting insight, as the two tables show below.

Table 38a: Two ends of the spectrum compared as to forms of objectification 

		No Muslim OBJECT	All Muslims general	Majority or most	Minority or a small /particular group	Individual	Unclassifiable Muslim	Islam in general	Islam mainstream	Minority currents within Islam	Specific religious stream / movement within Islam	Unclassifiable Islam	Total
FRA	Cultural rights and participation: religion	66	49	1	32	2	3	22	4	3	0	4	186
	Islamic extremism and violence	35	5	0	24	9	1	8	0	3	8	0	93
NL	Cultural rights and participation: religion	64	90	3	20	9	5	15	0	0	1	3	210
	Islamic extremism and violence	16	11	4	45	27	2	6	0	11	3	0	125
UK	Cultural rights and participation: religion	41	76	3	21	21	1	2	0	0	0	0	165
	Islamic extremism and violence	86	62	5	95	68	5	0	0	0	5	0	326
GER	Cultural rights and participation: religion	2	32	0	150	21	4	1	0	0	0	0	210
	Islamic extremism and violence	3	2	1	122	81	8	0	1	0	24	0	242
Total	Cultural rights and participation: religion	173	247	7	223	53	13	40	4	3	1	7	771
	Islamic extremism and violence	140	80	10	286	185	16	14	1	14	40	0	786

One clear trend can be observed across all for countries, namely that claims coded as 'Islamic extremism and violence' are more often directed to a specified object than claims that belong to the 'cultural rights and participation: religion' category. So, the expectation that negative claims will generally be more specifically formulated (Koomen et al., 2013) can be verified by those numbers. For religious practices, only Islamic religious practices outside public institutions in the Netherlands and Islamic religious practices inside public institutions in Germany received an overall negative score; the other six categories a positive one.

1

		Specific	Generalising	Unclassified	Total
FRA	Cultural rights and participation: religion	37	76	73	186
	Islamic extremism and violence	44	13	36	93
NL	Cultural rights and participation: religion	30	108	72	210
	Islamic extremism and violence	86	21	18	125
UK	Cultural rights and participation: religion	42	81	42	165
	Islamic extremism and violence	168	67	91	326
GER	Cultural rights and participation: religion	171	33	6	210
	Islamic extremism and violence	227	4	11	242
Total	Cultural rights and participation: religion	280	298	193	771
	Islamic extremism and violence	525	105	155	785

Table 38b: Two ends of the spectrum compared as to the degree of objectification

This tendency has a paradoxical effect as Islamic extremism and violence is a problematic category. A claims' level of specificity can also be considered as an indicator of relevance next to the amount and relative share of claims more generally.

	-1	0	+1	Unclassifiable	Total
FRA	26	59	8	0	93
NL	39	63	23	0	125
UK	13	286	27	0	326
GER	207	11	24	0	242

Table 39: Position towards 'Islamic extremism and violence'

Islamophobia is arguably a problematic term exactly because the specificity of a claim's object signifies the essence of the message, while Islamophobic claims – as being 'Islamophobic' – target an entire belief system. So, any claim with a negative proposition towards any specific object category does not necessarily imply either attitudinal or behavioural Islamophobia. Likewise, 'Islamic' in Islamic extremism and violence as adjective requires specificity, while Islamophobia as noun takes that away. Here is where majority-minority divisions play a crucial role. Positive claims towards Islamic religious practices have a rather generalising character, which points to somewhat nuanced stances (see Table 41 on p. 68). Discursive framing with regard to Islamic religious practices as matter of Muslims' integration seem to have therefore a more generalised character in the public sphere than Islamophobic claims. Generalising is one of the main sources of Islamophobic stances when "Islam seen as a single monolithic bloc, static and unresponsive to new realities" (RunnymedeTrustReport, 1997, p. 5). However, as Cesari links the securitisation of Islam to Islamophobic discourses in the public sphere to 9/11 (Cesari, 2006b) and also the essence of fading out discrimination in liberal democracies makes specificity of Islamophobia logical.

	Table 40: The two ends of the spectrum and positions	-1	0	+1	Σ
FRA	Minority rights and participation religious rights	26	61	98	185
	Racism/Islamophobia in institutional contexts	6	12	35	53
	Non-institutional racism/Islamophobia, xenophobia and extreme rights in society	3	13	15	31
NL	Minority rights and participation religious rights	54	62	93	209
	Racism/Islamophobia in institutional contexts	6	12	63	81
	Non-institutional racism/Islamophobia, xenophobia and extreme rights in society	0	3	19	22
UK	Minority rights and participation religious rights	8	81	76	165
	Racism/Islamophobia in institutional contexts	5	9	30	44
	Non-institutional racism/Islamophobia, xenophobia and extreme rights in society	9	57	77	143
GER	Minority rights and participation religious rights	94	15	101	210
	Racism/Islamophobia in institutional contexts	4	5	54	63
	Non-institutional racism/Islamophobia, xenophobia and extreme rights in society	0	0	38	38

For both, minority rights and participation religious rights, and institutional and non-institutional forms of Islamophobia, we observe a somewhat accommodating and pro-Muslim tendency. Only the minority rights and participation religious rights in Germany are rather contested as shown above.

	Table 41: Le		<b>1</b>			1	U 1		1	1				1		1	
		Allowance of Islamic ritual slaughtering	Allowance of Islamic call to prayer	Provision for burial according to the Islamic rite	Right to build minarets	Right to build (visible) mosques	Rights regarding the establishment and running of Islamic schools	Islamic religious classes in state schools	Right related to wear headscarf hair-covering headgear	"" for students	"" for teachers	Right related to wear <i>burga</i> or <i>nigaab</i> hair and face-covering headgear	" for students	"" for teachers	Islamic religious programs in public broadcasting	Imams in army and prisons	State recognition of Muslim consultative bodies
		Allo	Allo	Prov	Rigł	Rigł	Rigł	Islar	Rigl	Ĵ:		Rig]			Isla	Ima	Stat
FRA	Unclassified			_					_	_	_		;: 0				
FRA	Unclassified Generalising	3	0 0 Allo	1	0	16	3	0	0	11	0	0	0	0	0	2	1
FRA	Generalising	3 3	0	1 0	0 2	16 27	3 5	0 0	0 2	11 13	0 1	0 0	0 0	0	0 0	2 1	1 2
FRA		3	0	1	0	16	3	0	0	11	0	0	0	0	0	2	1 2 0
	Generalising Specified Total	3 3 1	0 0 0	1 0 0	0 2 0	16 27 6	3 5 1	0 0 0	0 2 1	11 13 16	0 1 0	0 0 0	0 0 2	0 0 0	0 0 2	2 1 0	1 2
FRA NL	Generalising Specified Total Unclassified	3 3 1 7	0 0 0 0	1 0 0 1	0 2 0 2	16 27 6 49	3 5 1 9	0 0 0	0 2 1 3	11 13 16 40	0 1 0 1	0 0 0 0	0 0 2 2	0 0 0	0 0 2 2	2 1 0 3	1 2 0 3 1
	Generalising Specified Total	3 3 1 7 3	0 0 0 0 0	1 0 0 1 0	0 2 0 2 1	16 27 6 49 8	3 5 1 9 18	0 0 0 0 2	0 2 1 3 2	11 13 16 40 3	0 1 0 1 0	0 0 0 0 1	0 0 2 2 1	0 0 0 0 0	0 0 2 2 1	2 1 0 3 0	1 2 0 3
	Generalising Specified Total Unclassified Generalising	3 3 1 7 3 0	0 0 0 0 0 0	1 0 0 1 0 0	0 2 0 2 1 1	16 27 6 49 8 2	3 5 1 9 18 15	0 0 0 2 7	0 2 1 3 2 0	11 13 16 40 3 8	0 1 0 1 0 1 1	0 0 0 1 0	0 0 2 2 1 5	0 0 0 0 0 0	0 0 2 2 1 0	2 1 0 3 0 0	1 2 0 3 1 0
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Table 41. Level of specificity as to Islamic religious practices

Just in Germany, claims on Islamic religious practices seem to be more specified. This can be explained by its federal nature that requires specification in national newspapers. Furthermore, "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" (Fetzer & Soper, 2005, p. 3), and thus the extent in which Muslims groups – most often *eingetragener Verein* (e.V). – are legitimately able to work with the state (Su, 2017). The allowance and accommodation of Islamic religious practices is more likely to prosper when indeed Muslim organisations are recognised with public corporation status. This means that – even though Muslim communities struggle to gain this status (Krämer, 2013), are relatively less present in the public debate, are the main advocates for their own religious rights – the claims still encompass a specified object. Furthermore, many of the claims on Islamic religious practices are not addressed very thoroughly, that is, a claim might incite for action by a specific actor, while some claims have no addressee at all (see Table 42 below).

Table 42: Share of claims on Islamic religious practices without an addressee

		Allowance of Islamic ritual slaughtering	Allowance of Islamic call to prayer	Provision for burial according to the Islamic rite	State recognition of Islamic organisations religions	Right to build minarets	Right to build (visible) mosques	Rights regarding the establishment and running of Islamic schools	Islamic religious classes in state schools	Right related to wear headscarf hair-covering headgear	Right related to wear burga or nigaab	Islamic religious programs in public broadcasting	Imams in army and prisons	State recognition of Muslim consultative bodies
France	No addressee	5	0	1	9	2	37	8	0	1	0	2	2	2
	Total	7	0	1	13	2	49	9	0	3	0	2	3	3
The Netherlands	No addressee	0	1	0	3	2	9	21	5	0	0	1	0	0
	Total	3	1	0	5	2	12	39	10	2	1	1	0	1
The United Kingdom	No addressee	1	0	0	0	0	1	2	0	4	4	0	0	0
	Total	3	2	3	1	1	7	7	1	10	5	0	1	0
Germany	No addressee	0	1	2	1	1	28	0	16	1	0	0	0	1
	Total	2	3	3	10	2	48	1	33	1	0	2	0	2

A contentious subject-matter is a matter that gets on a lot of resonance and becomes therefore visible. Furthermore, a relevant, contentious and socially relevant topic is framed so that the object is specified in the most effective and suitable way. Subsequently, the underlying message advocates for some discursive direction, say anti-Muslims or Islam, xenophobic extreme right; a rather neutral or ambivalent probable status quo preservation; or pro-Muslims or Islam and therefore antiracist and anti-extreme right. The assembly of these three dimensions – say visibility, specificity of the object and position towards the object – is what defines a discourse minimally. The above provided data suggest several discursive trends in relation to the accommodation of Islamic religious practices and anti-Islamophobic discourse. The causal mechanism behind all accumulated opinions and views of individuals – both Muslim and non-Muslim – and discourse is ambiguous. The discourse itself, nevertheless, is a factual reality in that all discursive elements in one way or another provides information for all involved individuals. As put forward earlier, rationalisation and emotionalisation as to the prevailing discourse affects the continuous flow of discursive elements; newcomers and removals contribute and omit to add, respectively. Trend is that – even though the 'Muslim' or 'Islam' is objectified in claims – 'Muslim' actor categories are or feel misrepresented<sup>46</sup>. "According to Shadid

<sup>&</sup>lt;sup>46</sup> Mail correspondence with Henk Nassier (AAIIA)

(2005) this misrepresentation is characterised by [among others] the underrepresentation of insider Muslims' voices and opinions" (Koomen et al., 2013, p. 192). This point is problematic for two reasons. First, the underrepresentation of insider Muslim representatives significantly affects discourse *an sich*. Second, liberal democracies strain after the opposite of a narrow spectrum of elite visions (Herman & Chomsky, 2010), and thus contested, say non-hegemonic views, must unrestrictedly find a way too. The question however is, whether voluntary abstention or selection mechanism by media gatekeepers underlie this underrepresentation (Shadid, 2005).

If we take a closer look at the two main themes that can be labelled as Islamophobic, namely the 'stigmatisation of minorities 'Muslim' 'Islam' in public debate' and 'Islamic extremism and violence', we see a somewhat expected pattern. Muslim organisations and groups in the Netherlands and the United Kingdom are more involved concerning those subject-matters particularly. It is therefore that Table 11 on page 42 is somewhat skewed, because it masks the formal and legal components of 'organisation' in each country.

	NL	UK	GER	Σ
0	7	13	0	20
2	1	0	0	3
9	5	2	10	26
oups' 0	0	0	2	2
1	11	43	0	55
0	0	2	2	4
11	3	16	10	40
oups' 2	0	18	1	21
FRA	NL	UK	GER	Total
22	80	204	0	306
8	4	22	10	44
177	50	63	103	393
15	10	90	12	127
222	144	379	125	870
	2 9 0ups' 0 1 0 11 0 11 0 5 8 5 7 7 15	$\begin{array}{c ccccc} 0 & 7 \\ \hline 2 & 1 \\ \hline 9 & 5 \\ \hline 0 \text{oups'} & 0 & 0 \\ \hline 1 & 11 \\ \hline 0 & 0 \\ \hline 11 & 3 \\ \hline 0 \text{oups'} & 2 & 0 \\ \hline \hline FRA & \text{NL} \\ \hline 22 & 80 \\ \hline \hline 8 & 4 \\ \hline 177 & 50 \\ \hline 15 & 10 \\ \hline \end{array}$	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$

The main theme of this paragraph is to expose whether or not, there are some noteworthy differences between institutionalised Islamic religious practices and discursive positions towards them. If we have to identify opportunities for Muslims in the discursive field, we must consider the rights regarding the establishment and running of Islamic schools and rights related to wear headscarf hair-covering headgear for female students in France. There are quite some positive, or pro-Muslim, claims to be found for these two rights, especially as they concern public institutions. For the Netherlands, discursive possibilities for Islamic religious classes in state schools exist as a matter of parity right. Practicalities and requirements such as quality of education, minimum amount of pupils, competencies of teachers and more educational legislation are explicit obstacles. For the United Kingdom, the least claims concerning Islamic religious practices can be found, while discrepancies between institutional pillars and accumulated discursive position are nil. This *inter alia* explains the discursive trend and attention on security aspects and also Islamophobia. For Germany, the national public debate can be considered as dynamic, this can be accounted for by two factors. First, the sixteen *Bundesländer* provide different institutional opportunities (e.g., see Lettinga & Saharso, 2014). Second, the status of Muslim groups is not always clear and therefore casting legitimately one voice is wavering.

	FRA	NL	UK	GER
State recognition of Islamic organisations religions	13	5	1	10
State recognition of Muslim consultative bodies	3	1	0	2

Just like in the Netherlands, Muslims in Germany have chances when advocating for Islamic religious classes in state schools. Such pleas' successfulness would be determined primarily by geographical and demographical variables.

### c. Ambiguities and contradictions

This paragraph sums up the paradoxes that fall between the theoretical expectations and the found data. Theoretical expectations based on institutional structures and the above provided data on the discursive field render some ambiguities.

First of all, discursive windows of opportunity cannot entirely be disentangled from institutional structures, as foreseen by path dependency (Tatari, 2009). At the same time, public institutions should by no means be confused with public sentiments (Joppke, 2013). So, while the institutional accommodation of Islamic religious practices has been expanded over the last forty years in Europe, anti-Islamic narratives have risen too. This 'complex parallelism' (Burchardt & Michalowski, 2015) has surfaced due to Europe's interacting and sometimes conflicting political-legal and cultural-religious values (Berger, 2013). This means that the triad of actor-relationships between the state and non-Muslim majority, the state and Muslim minorities, and non-Muslim majority and Muslim minorities differ as to the prevalence of political-legal or cultural-religious discourses. This leads to different forms of coexistence and confrontation, and therefore discursive impetus. Politicallegal discourses embodied by formal church-state regimes and Muslim representative Councils as communication channels primarily dominate the relation between state and Muslim minorities. While the prevalent discourse governing the interaction between Muslim minorities and non-Muslim majorities is a rather cultural-religious one, in which 'cultural distance' or gaps suggest discord. The state – as mediator – possesses an ambiguous role here, in conjoining both discourses in a unified way. This means that state actors justify their approaches as to accommodating Islamic religious practices and anti-Islamophobic practices in a political-legal way, that is, principles that undergird church-state regimes and so parity and exceptional group rights frames gratify. Likewise, the state imposes cultural-religious components in citizenship regimes, which by time became stricter (Tillie et al., 2013; Wallace Goodman, 2010). In other words, governments aim to construct "tailored citizenship requirements as a means to genuinely narrow the gap between newcomers and natives, rather than a means to exclude certain individuals from accessing the full benefits of society" (Banulescu-Bogdan, 2012, n.p.). The cultural-religious and political-legal narratives are moulded together in such a way that it does not violate the constitutional fundamentals and principles. The residuals are discussed in the public debates, that is, cultural-religious induced distance and 'gaps' that cannot be simply resolved unanimously in a political-legal manner. Within the public debates, "the concept of discursive opportunity structures can be applied to interpret how policy elites' own perceptions, meanings, and understandings tie into the wider cultural environment" (Coy, 2007, p. 115), but whereas the role of the state as mediator is ambiguous. The wider cultural environment is embodied by all those who reproduce or deviate from political elites' constructed hegemonic discourse and master frames. In sum, the state determines - within its institutional room for manoeuvre - the actualisation of accommodating Islamic religious practices, while media gatekeepers determine claims' chances to be diffused based on the hegemonic discourse. This means that precedent structures and media gatekeepers' selectivity is the main impetus for the discursive realm. The provided panoramic overview as to the six discursive elements do not explicitly showcase whether certain issues resonate due to rational strategic actions or are triggered by emotions related to the hegemonic discourse. It also does not fully explain the chances of all involved social movements and actor categories to get their demands heard. This is primarily a matter of selectivity by the media gatekeepers (Bleich, Bloemraad, & de Graauw, 2015; Entman & Bennett, 2001). What it does present, is the extent to which a Muslim's 'Muslimness' is enabled or restricted by both, institutional and discursive structures. All that what can be said and written in a particular space and time is not only propagated in the media, but also fuels forthcoming claims. Public sentiments on the issues ranging from Islamic religious rights to Islamophobic phenomena objectify Muslims or Islam. This, along with the premise that "[0]pposition against the accommodation of Islam in Western societies is often attributed to a prejudice against Muslims" (Van der Noll & Saroglou, 2015, p. 219), suggest that perceived virtualities on macro-, meso- and micro level dominate discourses along the entire spectrum.

The data show some cross-national differences especially when it comes to Islamic religious practices. The reoccurring theme of 'stigmatisation of minorities 'Muslim 'Islam' in public debates'' is a common feature four all four discursive realms; 33, 39, 21 and 41 counted claims in respectively France, the Netherlands, the United Kingdom and Germany. This stigmatisation – as anathema since

many claims within this category were coded as 'pro-Muslims/Islam/antiracist/anti-extreme right' (+1) – essentially signify the ills of the public debate.

Second, even though majority-minority divisions play a crucial role in discursive structures, classifications as 'state actors', 'Muslim minority' and 'non-Muslim majority' are too simplistic. Discursive structures are typically macro-structures to which meso- and micro-level actors are subjected. In other words, what societies consider to be 'normal' is the product of discursive regulation of power and the creation of subjectivity. Discourse can therefore be considered as artificialised room for manoeuvre. The utilisation of this room of manoeuvre, consisting of opportunities and restrictions, is ambiguous. "Actors do not reflect on most of the aspects of the discourse guiding their action, and some things are beyond their imagination. To some extent, however, a movement can relate its framing to discourses in a rational way. This applies for aspects of the discourse that movement actors reflect upon" (Baumgarten & Ullrich, 2016, p. 4). So, nonstrategic aspects of social movements' actions account for emotionalisation of that what is thought of and communicated at a given time in a given society and so influence the application of discursive resources of certain actors. The mere opportunities, however, derive from cultural factors as freedom of speech, impartial and neutral media channels which might conflict with social movements' internal philosophy. Herein lies the first challenge for social movements, namely to frame claims in a 'culturally resonant' way that accord with cultural factors (Swart, 1995). But, as shown by the provided data above, cultural distance and the perceptions thereof by individuals, especially given the claims concerning minority and participation rights labelled as 'religious rights' as a matter of contentiousness, determines strategic and non-strategic action. So, framing claims in a 'culturally resonant' way brings complications, particularly in this discursive playing field. Moreover, natives and Muslims perceive one another's attitudes on the freedom of speech rather differently as shown by the two tables below, which indicate that mass media as communication channel is ambiguous an sich.

Table 44a: Perceived attit	ude natives on freedom of speech by Muslims	FRA	NL	UK	GER	Total
	1. Very similar	207	92	164	284	747
	2. Quite similar	219	245	245	262	971
	3. Quite different	205	243	351	284	1083
	4. Very different	105	152	283	144	684
Total		736	732	1043	974	3485
Table 44b: Perceived attit	tude Muslims on freedom of speech by natives	FRA	NL	UK	GER	Total
Table 44b: Perceived attit	tude Muslims on freedom of speech by natives 1. Very similar	FRA 57	NL 18	UK 13	GER 28	Total 116
Table 44b: Perceived attit	1 V					
Table 44b: Perceived attit	1. Very similar	57	18	13	28	116
Table 44b: Perceived attit	1. Very similar     2. Quite similar	57 86	18 118	13 53	28 79	116 336

Source: (Jacobs & Koomen, 2011)

Third, discourses are not infinite, even if one neglects points of diffraction or points of incompatibility. Incompatibilities, for instance due to events such as elections or terrorist attack (Eickelman & Anderson, 2003) alter master frames. Therefore, the data retrieved from the five main newspapers in all four selected countries during the period between 1999 and 2008 brings an interesting overview. If discourse is analysed as a tool of governmentality by forming subjects who are suitable for governing purposes, then we must conclude that this tool is at least skewed due to societies' interpretation of discourse's virtue; "in modern democracies, the mass media occupy a central role in this regard" (Koopmans & Olzak, 2004, p. 202). The point I want to make here, is that the mass media as main source of information is always embedded in a society's regime of truth. The overall strength of a discourse is encapsulated in its objects, enunciative modalities, concepts and strategies, determining what societies consider as truth by distinguishing true and false statements (Rabinow, 1991). So, all that what is said and written in mass media meets at least the '*legitimacy threshold*' forasmuch objects, enunciative modalities, concepts and strategies. From here, one can conclude that the

discursive structures concerning Islamic religious practices and counteracting Islamophobia are highly dynamic in all four countries. With regard to the six discursive elements - claimants, forms, addressees, topic, object actors and frames - we have to conclude that the four discursive playing fields cannot be considered as solely stable. Discursive opportunity structures can be stable; "opportunities for politically effective collective action framing can stem from discourses that are long lived and deeply embedded in the surrounding culture. On the other hand, the social context can produce far more volatile discursive opportunities. Opportunities for successful movement framing that derive from relatively short-lived or relatively new ideational elements. These can still be critical or highly salient elements, but they are beliefs or values that are culturally significant for a shorter period of time or that are deemed important but are just emerging" (McCammon et al., 2007). Given that indeed the formal institutions as to the accommodation of Islamic religious practices have changed over time (Tillie et al., 2013), the fundamentals of national forms of secularism remain stable (Koenig, 2015). New ideational elements like the numerical significance of Muslim immigrants and their reception are traced back to two main explanations. Broadly speaking, religious competition between Christianity and Islam, and conflicting values between Muslims and non-religious majorities. This first strand foresees that secularisation brings increased competition among the remaining religious groups (Einstein, 2007; Scheepers, Gijsberts, & Hello, 2002; Stark & Finke, 2000). So, in the absence of state-sponsored religious monopoly, and thus the marginally regulated religious market, relatively small religious communities, 'newcomers' and even specific schools or branches will reinvigorate. As such, secularised induced pressure triggers 'religious deprivatisation' (Casanova, 2008) so that religious groups become more active and assertive in fighting their privatised positions. The second strand hypothesises that the non-religious majority - and thus the principal carriers of secular principles - can be considered as the most hostile category towards Muslims rather than other religious groups. This idea stems from the premise that Muslims challenge secular forms an sich as claims for the rights "to confessional education, protection of their faith from criticism and ridicule, and remedying of inequalities in laws and policies on the freedom of religious expression (Glendinning & Bruce, 2011)" (as cited in Ribberink, Achterberg, & Houtman, 2017, p. 8). If by insisting – besides public recognition – for state support, Muslims could challenge the secular truce. The relegation of religion from the public to the private sphere can be considered as liberating for the non-religious group (Achterberg et al., 2009), and therefore any challenge to the status quo is undesirable. Overall, this anti-Muslim sentiment constitutes a real threat to secularism and its accompanying principles as inclusiveness, equality, broadmindedness and tolerance (Emerson & Hartman, 2006). Especially, if Muslims are indeed considered as too demanding (Kayaoglu & Kaya, 2012; Zick et al., 2011), the opinion of natives on the separation of church and state becomes a plausible consequence. In other words, those who value reason over faith accept a divided 'value sphere', possibly until a new religion gathers momentum.

Fourth, if we compare the issued data of EUMIDIS II on Muslims and EURISLAM's media content analysis, we observe huge discrepancies as to the discrimination when it comes to finding a job, discrimination at the workplace, frequent police stops or the accessibility to public or private services. Those forms of discrimination are generally perceived as common across France, the Netherlands, the United Kingdom and Germany by Muslims, while the discursive realm does not count many claims within those categories for all four countries (see Appendix 13 on p. 143).

Fifth, another source of ambiguity is the presence of a privileged state church (Pollack & Pickel, 2009) and the extent to which parity and even exceptional group rights are accommodated, for instance in the United Kingdom. The nature and evaluation of parity group rights depends largely on the extent in which a particular church is privileged. Moreover, open or accommodating regimes are not necessarily more positively evaluated by Muslim minorities. Of course, variables as age and generational differences, socio-economic indicators as educational levels and income lurk (Statham, 2016). Essentially, we observe relatively few claims on Islamic religious practices in the United Kingdom, while its institutional provisions – say the existence of a state church and a relatively accommodating regime towards Islamic religious practices – might hypothetically induce a dynamic and contentious public debate. On the contrary, the public debate in Germany seems to be the most contentious and dynamic, where Islamic religious practices are relatively marginally accommodated (see Appendix 12 on p. 142).

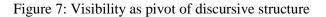
Lastly, the discrepancies or 'traffic' between Muslims as categories of analysis and categories of practice – albeit social, political or religious – result in a never ending process of self-identification as a response "to the experience of being called upon to account not only for themselves as Muslims, but also for what others say or do as Muslims (Schiffauer, 2004, p. 348)" (as cited in Brubaker, 2013, p. 3). It is wrong to suggest that 'Islam' or 'Muslims' as chronic object of debate is solely a matter dominated by majority-minority views. Maybe more importantly are the internal competing struggles as to the 'Muslim' and 'non-Muslim' representations of Islam that complicates matters. The different 'objectifications' regarding 'Islam' or 'Muslims', requires reflexive mind-sets instead of presupposed identifications. The discursive articulations may therefore not be received by the intended addressee, or more importantly, the generalising tendencies negatively influence a claim's legitimacy. Identities are defined in relation to others, and become increasingly important when one identity resides next to several other identities (Tillie et al., 2013). Essentially the 'actual' and 'perceived acceptance' produces some sort of image identity that gets redefined as circumstances change. The overall acceptance by the receiving society and the perceived acceptance experienced by the ethnic minority might diverge. The visible public debate is after all the main provider of information on the subjectmatter.

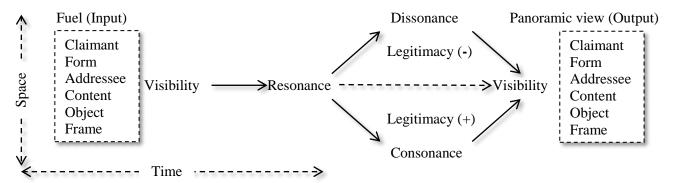
### d. Key arguments

This section emphasises how the discursive playing field should be interpreted. Both ends of the spectrum signify – loosely said – the accommodation and protection of Muslims' 'Muslimness'. While academic attention has primarily focused on states' approaches in this regard, the mass media is more and more considered as the main source of political information and contestation. One cannot deny that the incorporation of Islam in have triggered fierce national debates, ranging from deportations to numerous Islamic provisions (Tillie et al., 2013). From there, the discursive resource has become a rather powerful tool, since the competition for getting one's voice heard is unprecedented. Phrases like the '*Europeanization of Islam* or *Islamization of Europe*' (Berger, 2013; Hunter, 2002) are definitely not preposterous.

The discursive resource is "a concept, phrase, expression, trope, or other linguistic device that (a) is drawn from practices or texts, (b) is designed to affect other practices and texts, (c) explains past or present action, and (d) provides a horizon for future practice (Fairclough, 1992; Kuhn & Nelson, 2002; Watson, 1994). Discursive resources, then, are "tools" that guide interpretations of experience and shape the construction of preferred conceptions of persons and groups; in so doing, they participate in identity regulation and identity work (Alvesson & Willmott, 2002; Fournier, 1999)" (as cited in Kuhn et al., 2008, p. 163). The academic literature on social movements, protest events, and collective action has predominantly focused on formal contextual factors (political opportunities) and organisational resources (mobilising structures), while more and more attention shifts to discursive resources (framing processes) (Koopmans & Statham, 1999). As all three actor categories have stakes in discoursive dealing with Islamic religious practices and Islamophobia, all available discursive resources could be exerted. It is however the uneven distribution of discursive resources among all three actor categories that provides a legible playing field.

The three main concepts that undergird discursive opportunities through visibility, resonance and legitimacy can be extracted from the perceptions of the six discursive elements. Those six elements are the main variables of claim-making as all six elements contribute to discourse per se, but also impact the reception of instances of claim-making or discursive intervention (Berkhout & Sudulich, 2011). The mere awareness and perception of political factors essentially arise due to the publicly available and thus visible statements and actions. The visibility of statements and actions – as necessary condition – produces a bounded public sphere that is characterised by high levels of competition. The selection of statements and actions that ultimately become publicly visible can be regarded as the pre-stage of opportunities, while those statements and actions "that do not become publicly visible may be considered 'non-opportunities', which for all practical purposes might as well not exist at all" (Koopmans & Muis, 2009, p. 648). A discourse is a metamorphosis-like phenomenon that changes over time due to events, controversies, institutional developments and majority-minority divisions. Essentially, the amassment of every single discursive intervention – composed of the six elements - produces a bounded public sphere. After all, only a small amount of public claim-making receives media attention and thus enjoys the opportunity of diffusion to reach wider audiences. In other words, the visibility of a claim is a predetermined necessary condition.





From there, a claim's reception embodies a further type of discursive opportunity or constraint. Essentially, the quantity and quality of responses that a particular claim receives provides an indication about the nature of the claim and claimant, that is, the extent of a claim's controversy and legitimacy of the claimant determines the provocation of reactions. So, the claimant and the construction of its claim co-function is a way that other actors in the public sphere assess their discursive co-functioning. The extent to which an actor's message provokes reactions can be referred to as 'resonance'. The importance of resonance is twofold as it is both, an indication of a message's relevance and an incentive for gatekeepers to allow for responses, albeit it positive or negative, ultimately leading to reproduction of the original message. Support for the original message – consonance – and rejection – resonance – both imply reproduction and also the chances of further discursive echoing in the public sphere.

"Discursive opportunities are measured by: the amount of visibility in the media; the amount of dissonance in the media; and the amount of consonance in the media" (Ibid., p. 651). However, an objective panoramic view over the six dimensions of political claim analysis (Berkhout & Sudulich, 2011) designates the key concept of visibility. Visibility is not simply and solely the main determinant of public discourse; it also is the outcome of resonance due to visible responses. In other words, resonance – by means of dissonance and consonance – fuels the observable hegemonic discourse. The overall playing field is composed of claimants, forms, addressees, content, objects, and frames of a claim. It is however, the subjectivity of the panoramic view forasmuch the six elements that contributes to either positive or negative perceptions concerning opportunities for actors. The quantitative indicators, say the six discursive elements, are set out providing an objective panoramic overview of the public discourses in France, the Netherlands, the United Kingdom and Germany. As Cinalli and Guigni (2013) state, cross-national differences exist when it comes to public discourses, that is, the controversies that dominate public debates (Cinalli & Giugni, 2013).

Controversy an sich is a controversial dimension, since frames provide different points of reference. Even though a great deal of cultural and religious relations is affected by law and jurisprudence, say institutional frames, conceptions as to cultural and religious relations is of importance too. Conceptions of national identity, citizenship, church-state regimes per se might incite fierce debates on ideological foundations; however, it is the position of Islam within these structures that are contested and resonates in the public sphere. The public sphere that brings formalities and informalities together, as the political claims analysis prescribes with regard to the diversity of intervening actors, the addressed issues, the policy positions and used frames for claims always relate to the status-quo. A claim is a strategic action in the public sphere that results from a purposive strategy by the claimant and must be political in the sense that it addresses a social issue that requires some sort of altered response, as the status-quo insufficiently handles the phenomenon. Therefore the public debate in Germany can be considered as most contentious and controversial with only fifteen unclassifiable claims. Institutionally, Muslims in France and Germany face more obstacles with regard to the accommodation of Islamic religious practices. Essentially, the academic literature foresees three main dimensions that suggest whether or not certain Islamic religious practices are pliable or exigent. Arguably, the position vis-à-vis public institution, that is, inside or outside as a matter of states' neutrality, the nature of a right, that is, parity or exceptional rights as a matter of equality in respect to religious freedom and visibility that makes practising a religion explicitly a private matter, are influential institutionally and discursively. Those three dimensions bring all three actor categories together, since they deal with demarcations between state and religion, degree in which a religion enjoys privileges and the extent in which a religion could be publicly practiced respectively. Given that Islam is - after various Christian denominations - the largest and also rapidly increasing religion in all four countries (CIA, 2017; PRC, 2017a), national trajectories that accommodate and protect Muslims' 'Muslimness' must be moulded in a societal acceptable way. Based on the formal structures (see Appendix 1 on p. 106) an overview of the most contentious Islamic religious practices can be provided.

	Outside / Inside	Par	rity / ex	ceptic	onal	Visible / invisible
Allowance of or the right to	Equal	FR	NL	UK	GE	Equal
Islamic ritual slaughtering	Outside	$p^{47}$	р	р	$p^{48}$	No
Islamic call to prayer	Outside	р	р	р	р	Yes
build (visible) mosques	Outside	р	р	р	р	Yes
build minarets	Outside	р	р	р	р	Yes
burial according to the Islamic rite <sup>49</sup>	Outside	е	е	е	е	No
establishment and running of Islamic schools	Inside	$e^{50}$	р	р	$p^{51}$	Yes
Islamic religious classes in state schools	Inside	е	р	р	$p^{52}$	No
wear headscarf hair-covering headgear for female students	Inside	е	р	р	р	Yes
wear headscarf hair-covering headgear for teachers	Inside	е	р	р	р	Yes
wear burqa or niqaab hair and face-covering headgear for female students	Inside	е	е	е	е	Yes
wear burqa or niqaab hair and face-covering headgear for teachers	Inside	е	е	е	е	Yes
Islamic religious programs in public broadcasting	Inside	е	р	р	е	Yes
Imams in army and prisons	Inside	р	p	p	$p^{53}$	No

\* *p* stands for parity right; *e* stands for exceptional right

The visible-invisible dimension must be considered as most prominent for non-Muslim majority as cultural-religious discourse, while state's neutrality and the parity-exceptional as political-legal discourse will be more prominent for state actors. Therefore, the 'Muslimness' of Muslims differ considerably across France, the Netherlands, the United Kingdom and Germany as their opportunities within the discursive sphere.

France maintains a very strict and formal separation of state and church. State authorities are even prohibited to collect data on religious beliefs and affiliation since 1872. This means that the discursive opportunities for Muslim-minorities can be found in the visible-invisible dimension, since *laïcite* defines what can be considered as parity or exceptional right. The Netherlands maintains some hereditary structures form its pillarisation model, the parity-exceptional dimensions provides opportunities for Muslim minorities, while the visibility aspect must be considered as pitfall for those practices that significantly differ from similar rights. In other words, the Islamic call for prayer as parity right pertaining to ringing Church bells is likely to incite cultural-religious opposition instead of political-legal support. Since the United Kingdom has a state church, the parity-exceptional dimension, at least hypothetically, suggests rational and emotional discursive resources that back-up Muslim minorities. Since Germany is a federal state, maintains rather restrictive corporatist stance towards Muslim minorities' organisational mobilisation possibilities, and the public debate is the most contentious one, the overall opportunities are relatively minimalist.

Overall, this would suggest that for French Muslims, the right to build visible mosques and rights related to wear a headscarf (hijab) or hair-covering headgear for female students are more promising than the other rights. In the Netherlands, windows of opportunities are relatively open regards Islamic religious classes in state schools, and to a lesser extent rights regarding the establishment and running of Islamic schools. Overall, any support for the *burga* or *niqaab* can hardly be found in the public debates. Even though the rights related to burga and niqaab for female student and teachers resonate more in the United Kingdom than elsewhere, the overall position can be

<sup>&</sup>lt;sup>47</sup> The European Court of Human Rights via: <u>https://hudoc.echr.coe.int/eng#{"dmdocnumber":["696615"],"itemid":["001-58738"]}</u> <sup>48</sup> The German Federal Constitutional Court via:

http://www.bundesverfassungsgericht.de/SharedDocs/Entscheidungen/DE/2002/01/rs20020115\_1bvr178399.html

<sup>(</sup>Everplans, 2017)

<sup>&</sup>lt;sup>50</sup> (Pépin, 2009)

<sup>&</sup>lt;sup>51</sup> (Knauth, 2007)

<sup>&</sup>lt;sup>52</sup> Article 7.3 of the Basic Law of 23 May 1949 via (Pépin, 2009)

<sup>&</sup>lt;sup>53</sup> (Schnabel, 2007)

considered as the mere majority of the British people favours a total ban (Stone, 2016). The principal issue for German Muslims would, hypothetically, be the establishment and recognition of Muslim organisations so that Muslims can organise themselves on an equal legal footing as Christian and Jewish organisations, granting several privileges. In essence such recognition connotes a parity right. Furthermore, the right to build mosques, and even more so the right to Islamic religious classes in state schools are promising windows of opportunity for German Muslims.

The sphere of Islamophobia is ambiguous for one specific reason. The position of a claim towards a particular form of Islamophobia, say anti-Muslims or Islam, xenophobic and extreme right, or pro-Muslims, or Islam, antiracist or anti-extreme right resulted from consonance or dissonance. This means that any anti-Islamophobic claim reproduces a visible Islamophobic stance or the phenomenon per se. Moreover, if the Islamophobic discourse invigorated after 9/11 (Cesari, 2014), one must directly look into Islamic extremism and violence as discursive subject-matter. Having done that, we see that such claims are generally more specified as to the object, pointing to essence (Koomen et al., 2013). Generally, the claims on other forms of Islamophobia seem to have a more generalised character that indicates that we deal with an actual phenomenon that indeed looms over the Muslim community as a whole. It is therefore that I agree that it "remains imperative to distinguish between the social problems and the religious challenges: Muslim and non-Muslim citizens alike need to desislamise the social fractures for unemployment, violence and marginalisation have nothing to do with Islam or the Islamic belonging" (Ramadan, 2013, p. 4). And that, at the same time, the term 'Islamophobia' cannot be used to capture all that what is caused by prejudice. In other words, the eight closed views on Islam (RunnymedeTrustReport, 1997) as forms of prejudice do not entirely cover a 'phobia' or 'fear', but rather 'Islamprejudice' (Imhoff & Recker, 2012). The other way around, a direct threat that brings fear requires specific framing, while prejudice logically leads to the generalisation of an object. Islamophobia or the 'fear of Islam' points to a religion, but individuals suffer from the consequences. But these individuals are barely discursively united towards the negative consequences of prejudice (Kunst et al., 2012). One way in which this generalisation happens, both in practice as in the discursive sphere, is the ethnicisation of Islam. Family names, physical traits and Islam got intertwined; "several scholars have argued that religious categories have not only replaced ethnic categories as the salient part of immigrant self-concepts, but also as political categories (Modood & Ahmad, 2007)" (as cited in Imhoff & Recker, 2012, pp. 4-5).

Matthijs Louwrens Leeuw	No Muslim OBJECT	All Muslims general	Majority or most	Minority or a small /particular group	Individual	Unclassifiable Muslim	Islam in general	Islam mainstream	Minority currents within Islam	Specific religious stream / movement within Islam	Unclassifiable Islam	
Table 46: Religious rights and Islamic extremism and violence as key themes in all four countries		7	Majority	Minority /particul	Indiv	Unclas Mus	Islam in	Islam ma	Minority within	Specific stream / n within	Unclassifi	
	Fran											
Political rights and participation	2	4	0	0	0	0	0	0	0	0	0	L
Social rights and participation: labour market	0	2	0	0	0	0	1	0	0	0	0	L
Social rights and participation: education	0	1	0	1	0	0	0	0	0	0	0	
Social rights and participation: health and welfare	0	0	0	1	1	0	0	0	0	0	0	L
Social rights and participation: housing and segregation	0	0	1	0	0	0	0	0	0	0	0	
Social rights and participation: other general	0	0	0	2	0	0	0	0	0	0	0	L
Cultural rights and participation: education	0	1	0	0	1	0	1	0	0	0	0	L
Cultural rights and participation: religion	66	49	1	32	2	3	22	4	3	0	4	1
Cultural rights participation: recognition group identity differences	3	2	0	2	1	0	0	0	0	0	0	_
Expulsions / deportations	1	0	0	1	14	0	0	0	0	0	0	
Discrimination in politics	0	0	0	3	0	0	0	0	0	0	0	L
Discrimination in the police and judiciary system	1	1	0	0	0	0	0	0	0	0	0	L
Discrimination: other specific issues	0	4	0	2	0	0	0	0	0	0	0	
Crime	3	0	0	0	0	0	0	0	0	1	0	L
Political extremism and violence	1	0	0	0	1	0	0	0	1	3	0	
Islamic extremism and violence	35	5	0	24	9	1	8	0	3	8	0	_
Racism Islamophobia and extreme right language in politics	0	1	0	0	1	0	0	0	0	0	0	L
Police racism Islamophobia and violence against minorities	1	0	0	3	5	0	0	0	0	0	0	L
Racism Islamophobia in other state institutions	0	1	0	0	0	0	0	0	0	0	0	
Racism Islamophobia in non-state institutions	0	0	0	0	2	0	0	0	0	0	0	1
Stigmatisation of minorities 'Muslim' 'Islam' in public debate	20	4	2	1	0	0	3	0	0	3	0	1
General Islamophobic claims	0	8	0	0	0	0	5	0	0	0	0	-
Against Islamification	0	1	0	0	0	0	0	0	0	0	0	L
Other anti-Islam Muslim claims	2	2	0	6	2	0	4	0	1	0	0	
	Netherl			_		-		_	_			
Political rights and participation	2	3	0	0	1	0	1	0	0	0	0	L
Social rights and participation: labour market	0	5	0	1	0	0	0	0	0	0	0	L
Social rights and participation: education	1	2	1	1	0	0	0	0	0	0	0	-
Social rights and participation: health and welfare	2	2	0	0	0	0	0	0	0	0	0	L
Social rights and participation: language acquisition	1	0	0	0	0	0	0	0	0	0	0	_
Social rights and participation: police and judiciary	1	0	0	0	0	0	0	0	0	0	0	-
Social rights and participation: other general	3	1	1	0	0	0	2	0	0	0	0	L
Cultural rights and participation: education	2	2	0	2	0	0	0	0	0	0	0	_
Cultural rights and participation: religion	64	90	3	20	9	5	15	0	0	1	3	2
Cultural rights participation: recognition group identity differences	1	1	0	0	0	0	0	0	0	0	0	L
Expulsions / deportations	4	0	0	2	6	0	0	0	2	0	0	-
Discrimination in politics	1	2	0	0	0	0	0	0	0	0	0	L
Discrimination in the labour market	0	3	0	0	1	0	0	0	0	0	0	L
Discrimination: other specific issues	0	1	0	0	0	0	0	0	0	0	0	-
Crime	3	3	0	2	6	0	0	0	0	0	0	_

6 0

6 0

0 0

0 0

0 0

1 0

3 0

Political extremism and violence

Islamic extremism and violence

General Islamophobic claims

Other anti-Islam Muslim claims

Against Islamification

Racism Islamophobia and extreme right language in politics

Police racism Islamophobia and violence against minorities

Stigmatisation of minorities 'Muslim' 'Islam' in public debate

Racism Islamophobia in other state institutions

Racism Islamophobia in non-state institutions

- The United Kingdom												
Political rights and participation	1	2	0	0	0	0	0	0	0	0	0	3
Social rights and participation: labour market	1	0	0	0	0	0	0	0	0	0	0	1
Social rights and participation: education	0	3	0	0	0	0	0	0	0	0	0	3
Social rights and participation: health and welfare	0	3	0	0	1	0	0	0	0	0	0	4
Social rights and participation: language acquisition	1	0	0	0	0	0	0	0	0	0	0	1
Social rights and participation: housing and segregation	1	0	0	0	0	0	0	0	0	0	0	1
Social rights and participation: police and judiciary	1	2	0	0	0	0	0	0	0	0	0	3
Social rights and participation: other general	4	5	0	2	0	2	1	0	0	0	0	14
Cultural rights and participation: education	1	4	0	1	0	0	0	0	0	0	0	6
Cultural rights and participation: religion	41	76	3	21	21	1	2	0	0	0	0	165
Cultural rights participation: recognition group identity differences	0	0	0	1	0	0	0	0	0	0	0	1
Expulsions / deportations	0	0	0	1	8	0	0	0	0	0	0	9
Discrimination in politics	1	0	0	1	0	0	0	0	0	0	0	2
Discrimination in the labour market	4	1	0	0	1	0	0	0	0	0	0	6
Discrimination in the education system	2	1	0	0	0	0	0	0	0	0	0	3
Discrimination in health and welfare services	0	1	0	0	0	0	0	0	0	0	0	1
Discrimination in the police and judiciary system	11	8	0	5	3	0	0	0	0	0	0	27
Discrimination: other specific issues	4	1	0	0	2	0	0	0	0	0	0	7
Crime	12	1	1	10	8	1	0	0	0	0	0	33
Political extremism and violence	5	2	0	5	2	3	0	0	0	1	0	18
Islamic extremism and violence	86	62	5	95	68	5	0	0	0	5	0	326
Racism Islamophobia and extreme right language in politics	0	2	0	0	0	1	0	0	0	0	0	3
Police racism Islamophobia and violence against minorities	3	0	0	1	0	0	0	0	0	0	0	4
Racism Islamophobia in other state institutions	1	1	0	0	0	0	0	0	0	0	0	2
Racism Islamophobia in non-state institutions	0	2	0	1	0	2	0	0	0	0	0	5
Stigmatisation of minorities 'Muslim' 'Islam' in public debate	12	6	1	1	0	0	0	0	0	1	0	21
General Islamophobic claims	1	3	0	1	0	0	1	0	0	0	0	6
Against Islamification	2	0	0	0	0	0	2	0	0	0	0	4
Other anti-Islam Muslim claims	2	4	0	6	3	0	3	0	0	0	1	19
	Berman							_				
Political rights and participation	0	3	0	6	0	0	0	0	0	0	0	9
Social rights and participation: labour market	0	0	0	1	0	0	0	0	0	0	0	1
Social rights and participation: education	0	0	0	4	1	0	0	0	0	0	0	5
Social rights and participation: health and welfare	0	0	0	1	0	0	0	0	0	0	0	1
Social rights and participation: other general	0	0	0	0	0	1	0	0	0	0	0	1
Cultural rights and participation: education	0	0	0	2	0	0	0	0	0	0	0	2
Cultural rights and participation: religion	2	32	0	150	21	4	1	0	0	0	0	210
Cultural rights and participation: other general	0	0	0	2	0	0	0	0	0	0	0	2
Expulsions / deportations	0	0	0	6	27	1	0	0	0	0	0	34
Discrimination in the labour market	0	0	0	1	3	0	0	0	0	0	0	4
Discrimination: other specific issues	0	1	0	0	0	0	0	0	0	0	0	1
Crime	0	0	1	11	8	0	0	0	0	0	0	20
Political extremism and violence	0	1	0	7	2	1	0	0	0	0	0	11
Islamic extremism and violence	3	2	1	122	81	8	0	1	0	24	0	242
Racism Islamophobia and extreme right language in politics	1	3	0	4	0	0	0	0	0	0	0	8
Police racism Islamophobia and violence against minorities	0	0	0	4	2	0	0	0	0	0	0	6
Racism Islamophobia in other state institutions	0	0	0	1	0	0	0	0	0	1	0	2
Racism Islamophobia in non-state institutions	0	3	1	0	0	0	0	0	0	0	0	4
Stigmatisation of minorities 'Muslim' 'Islam' in public debate	2	10	5	6	3	2	5	0	0	8	0	41
General Islamophobic claims	0	0	0	2	0	0	2	0	0	0	0	4
Against Islamification	0	1	0	3	0	0	0	0	0	0	0	4
Other anti-Islam Muslim claims	0	3	0	3	0	1	1	0	0	0	0	8

### e. Concluding answers to the questions

The gathered insights from previous chapters are put together in conclusive form in this section. I consider the extent of accommodation of Islamic religious practices as indicator of host societies' hospitality, flexibility and relative position to Islam more generally. Whereas Christian denominations and the state apparatus defined church state structures, Muslim minorities are simply put, subjected to these structures. However, the extent in which Muslim minorities actually could frame their chances in respect to religious practices and their position within the host society more generally can hardly be measured through states' formal institutions. The emergence of mass media and with it the conception that information provided through such communication channels informs the publics all but marginally.

The extent, in which cultural-religious discourse dominates the accommodation of Islamic religious practices and therefore subordinates European political-legal principles, is likely to negatively affect Muslim minorities' opportunities. The distance between Islamic religious practices and the accumulated position of all discursive actors is relatively large, and more importantly exceeds that what is institutionally possible. From here, one must explicate the demarcations between parity and exceptional group rights which are institutionalised in church-state regimes. These two dimensions, along with the degree of allowance of Islamic religious practices enable us to assess the static-ness of the state. The sphere of Islamophobia has extensive political-legal and cultural-religious implications too. The interactive spectrum stems from the perceptional and sometimes overlapping ideas concerning accommodating and protecting Muslims' 'Muslimness'. The first sub-question what are discursive opportunity structures and which can be observed for Muslim minorities in West secular Europe? - can be answered inductively by means of the panoramic overview of the six discursive elements prescribed by the political claim analysis. Discursive opportunity structures are the "aspects of the public discourse that determine a message's chances of diffusion in the public sphere" (Koopmans & Muis, 2009, p. 648; Koopmans & Olzak, 2004, p. 204; Koopmans & Statham, 1999, p. 202). Those structures cannot easily be exposed entirely, as to gatekeepers' selectivity mechanisms. However, media gatekeepers' actual selection can be analysed, coded and interpreted. In other words, the visible statements and claims documented in prominent newspapers have surpassed some sort of prominence threshold, embodied in a claims' legitimacy or controversy within the boundaries of that what can be said and written in a particular space and time.

First, many claims seem to not have an explicit addressee. This is rather problematic, especially when we deal with evaluative claims that aim to direct the public debate over 'Muslims' or 'Islam' in a particular direction. Evaluative claims indicate contestation. From there, we must conclude that the public debate concerning the place of Islam or Muslims in society is the least contested in the United Kingdom, where many claims – especially on minority social problems (439) – do not push for a particular direction. Moreover, the mean score of the position of claims in general is high and a rather low standard error implies a less dynamic public debate compared to the other three countries (see Table 10 on p. 41). Moreover, the United Kingdom has the lowest share of claims that do not encompass a clear addressee (see Table 42 on p. 69).

The second sub question deals more specifically with the two ends of the interactive spectrum, emphasising the protection (anti-Islamophobia) and accommodation (granting Islamic religious rights) of Muslims' 'Muslimsness': *How can we define Muslim minorities' discursive playing field with regard to group demands for Islamic religious practices and counteracting Islamophobia in West secular Europe?* Several differences as to discursive opportunities can be observed here. Most importantly, the degree of specification of the object is one dimension in which the two sides differ. Noteworthy, the form of 'Islamic extremism and violence' is the main form of fear and logically demands very well-specified statements. This is in itself paradoxical as 'Islamic' as adjective suggests a religious foundation, not necessarily an entire belief system, the same holds for 'extremist and violent Islam'. Claims on 'Islamic extremism and violence' are generally and comparatively pretty well-specified regards the object actor. Then, if we take a look on the perceived ghost that curses the fairness of the public debate – say the 'stigmatisation of minorities 'Muslim' or 'Islam' in public debate' – we literally see the ills embodied by the generalising tendency of claims. In other words, claims coded as 'stigmatisation of minorities 'Muslim' or 'Islam' in public

		Position of claim towards issue				
		-1	0	+1	Unclassifiable	Total
FRA	Stigmatisation of minorities 'Muslim' or 'Islam' in public debate	3	9	21	0	33
NL	Stigmatisation of minorities 'Muslim' or 'Islam' in public debate	3	7	29	0	39
UK	Stigmatisation of minorities 'Muslim' or 'Islam' in public debate	1	6	14	0	21
GER	Stigmatisation of minorities 'Muslim' or 'Islam' in public debate	4	3	34	0	41
Total	Stigmatisation of minorities 'Muslim' or 'Islam' in public debate	11	25	98	0	134

Muslims/Islam/antiracist/anti-extreme right' and thus condemn any mark of general disgrace in the public debate.

Also, the main perceived areas of behavioural Islamophobia – in finding a job, discrimination at the workplace, frequent police stops or the accessibility to public or private services (FRA, 2016) – are hardly discussed. Just the 'discrimination in the police and judiciary system' in the United Kingdom seems to resonate publicly (see Table 46 on pp. 79-80).

Furthermore, disentangling institutional structures from discursive ones becomes problematic when we consider the involvement of 'Muslim actors' in national public debates. The discursive opportunity structure is therefore not simply a reflection of that what can be said and thought of in a particular space and time, by also by whom as a matter of legitimacy. In other words, the institutionalisation of organisational rights and communication channels between state and Muslim minorities cannot be neglected, which is highlighted by 'Muslim actors'' involvement (see Tables 43a and 43b on p. 70). If we take a look on the right end of the spectrum or the contentious matters of Islamic religious practices, the following practices can be considered as relatively promising for Muslim minorities.

	The right to or the allowance of
France	Build (visible) mosques
	Wear a headscarf (hijab) or hair-covering headgear for female students
The Netherlands	Islamic religious classes in state schools
	Establishing and running of Islamic schools
The United Kingdom	Build (visible) mosques
	Wear headscarf (hijab) or hair-covering headgear (or rather the overall acceptance
	thereof)
Germany	The establishment and recognition of Muslim organisations
	Build (visible) mosques
	Islamic religious classes in state schools

This conclusion is based on five dimensions: (1) the relative position to public institutions, (2) the nature of rights, say parity or exceptional, (3) the visible aspect of the relative (Leggewie, 2001), practice or ritual, (4) the overall accumulated position of claims towards the right, and (5) the amount of claims towards the right, practice or ritual as measure of contentiousness. The first two dimensions are primarily formally certain; this does not mean that the public debates are perfect reflections of such institutional determinants. In sum, the discursive opportunities forasmuch Islamic religious practices for Muslim minorities differ somewhat across the four observed countries (see Table 35 on p. 63). The accommodation of Muslims' 'Muslimsness' and the extent in which such accommodations are discursively accepted influences the rationalisation and emotionalisation of object categories towards the public debate. Also, not every non-pro/positive position towards Islamic religious practices must be labelled as "anti-Muslims/Islam/xenophobic/extreme right" if we adhere Brubaker's argument on the essence of the interplay between self- and other-identifications (Brubaker, 2013) and concerning the existent structures. From there, the framing perspective becomes important. Constructing a claim in a culturally resonant way might be problematic when social movements' internal communication and knowledge conflicts with the hegemonic discourse, emphasising the essence of majority-minority divisions.

# 5. Conclusion

## a. General answer to the research question

The above chapters provide numerous arguments why the French, Dutch, British and German Muslims find themselves in different spheres, institutionally and discursively, and so their enabled 'Muslimness'. The discursive playing field determines social movements' - through rationalisation and emotionalisation – decisions to adduce their discursive resources. Eren Tatari (2009) set out the four main theories concerning the state accommodation of Islamic religious practices in Western Europe, namely resource mobilisation theory, political opportunity structure theory, ideological theories on citizenship, nationhood and assimilation policies, and church-state relations theory. She contends that "Muslim minorities have to function within the political opportunity structures" (Tatari, 2009, p. 284), and thus are subjected to path dependency. She rightly points to the highly heterogeneous group of Muslims - divided among ethnic, political, gender and class lines - that triggers a lack of religious cohesion and thus negatively affects resource mobilisation potential. What her dynamic compound framework is missing, however, is the essence of majority-minority divisions disclosed by the discursive area. The discursive area is typically a feedback mechanism. "[D]iscursive differences are less related to actual integration policy, but more to a logic system of distinctions and categorisations used in the integration debate that can be either inclusive or exclusive in governing diverse societies" (Koomen et al., 2013, p. 199) that inform actors in the field of integration, suggest the importance of discursive structures that either provide or restrict opportunities.

Tatari's compound framework is out-dated as it neglects the essence of the discursive sphere, since the mass media must be seen as mainstream agency for cultural transmission (Norris & Inglehart, 2012) by "discouraging or sanctioning certain behaviours and tolerating or rewarding others, and by discursively giving public visibility and legitimacy to certain behaviours, opinions and expressions, while marginalizing or stigmatising others" (Tillie et al., 2013, p. 14). Overall, the discursive opportunities are rather limited for Muslim minorities in all four countries; institutional structures provide more opportunities with regard to both ends of the spectrum. In other words, the cultural-religious discourse is more restrictive for Muslim minorities than political-legal discourse (Berger, 2013). This can be highlighted by the perceived mutual differences between Muslim minorities and non-Muslim majorities regarding the role of religion in society and the roles between men and women in the household (Tillie et al., 2013) (see Appendix 6 and p. 129). Moreover, the ills of the public debates are publicly discussed; say the negative implications of stigmatisation. People in many Western countries greatly overestimate their current Muslim population (IPSOS, 2016). This is problematic for various reasons (Leggewie, 2001). First, the numerical significance of the Muslim population is of importance by reason of - what Maurits S. Berger calls 'physical Islam' (Berger, 2013) – perceived majority-minority divisions and therefore misinterpretations. Majority-minority divisions are a jam-up with an eye on the legitimacy and quality of the public debate. Second, overestimating real and perceived problems intensifies heated debates and controversy around cultural and religious integration of Muslims and Islam in Europe (Tillie et al., 2013).

	Average guess	Actual share
France	31	7.5
The Netherlands	19	6
The United Kingdom	15	4.8
Germany	21	5

A whole lot of theories as to the cultural integration of migrants exist (see Norris & Inglehart, 2012), providing an enormous matrix of explanatory variables forasmuch fixedness or malleability of religion-induced cultures. The institutional side – national identity, citizenship and church-state relation – partly explain the perceived cultural distance and interactions more generally between Muslim minorities and the receiving society population. I agree with the perception that signs of national identities, citizenship regimes and forms of secularism can be observed within the national debates. So that some practices are rather contentious in one country, "while they are hardly debated at

all in other countries, either because they are consensually accepted, or because they are consensually rejected" (Carol & Koopmans, 2013, p. 166). Institutionally, one could expect the public debates to be centred on the visibility of religious symbols and thus on public-private divisions in France, on integration, assimilation and stigmatisation; preventing extremism in the Netherlands, securitisation and anti-discrimination in the United Kingdom, and geographical, demographic and socio-economic consequences of immigrants in Germany.

This search however, provided an objective panoramic overview of the main issues regarding Muslims' integration in four West European secular countries, and thus the possibilities for framing a claim in a cultural-resonant way. Foucault's knowledge-power complex foresees that discursive regulation of power determines social movements' ideational processes, contextualisation and thus discursive formations. Discursive formations delimit the totality of possible statements or 'the archive', while there is room for manoeuvre within the limits. This archive provides room for choosing frames, particularly on the meso-level, which is typically the product of resonance between the social movement cultural frame and the 'master' or hegemonic frame. This suggests that 'the archive' of cultural resonant claims is limited concerning Islamic religious practices in France and Germany and more promising in the Netherlands and the United Kingdom.

This granting of rights arouses the importance of discourse of power. "Frequently, it is alleged, the real effect of conceding rights to these sorts of group is to reinforce the power of conservative elites whose wishes and interests clash with those of others in the group" (Jones, 2008, n.p.). If conceding rights, the power of the state is reinforced, even when those conceded rights clash with the interests of the non-Muslim majority. This can be observed for rights related to wear headscarf haircovering headgear for female students in the Netherlands and Germany. This is in line with politics seen as a struggle for power, between those who want to maintain their power and those who resist it (Chilton, 2004). Muslim minorities have a rather positive opinion on the separation of church and state, more so than natives (see Appendix 7 on p. 130). Moreover, Muslims tend to trust public institutions more so than the general population (FRA, 2016). Overall, the political-legal narrative is more promising for Muslim minorities than cultural-religious narrative. Except that Muslims are not very well convinced about the role representative Muslim Council play for various reasons (see Appendix 9 on pp. 132-133). Initially Muslim Councils were set up precisely to mediate between the state and Muslim minorities (Laurence, 2011) and to include "some minority voices in public debate" (Meghan Benton & Nielsen, 2013, n.p.). So, while even the political-legal narrative might be more efficient to get their demands heard, the position of Muslim organisations and Muslim Councils is staggered, among others due to state's involvement as establishment and appointing representatives.

Both Islamic religious practices and Islamophobia can be discussed within the same culturalresonant frames. Both ends of the spectrum could relate to basic human rights linked to forms of discrimination, religious freedom, public order, securitisation, democracy and authority of state. This again signifies the stretched concept of Islamophobia, that is, it overlaps with states' restrictive position to or denial of Islamic religious practices e.g., is banning headscarves for female students a form of Islamophobia? With regards to Islamophobia, arguably a controversial term, Islamic extremism and violence is not just the most controversial and discussed topic, it can be considered as the sole form of fear. 'Islamprejudice' better comprehends discriminatory forms in education, by police or judiciary system, on the labour and housing market. I would argue so, because the level of specificity of claims suggests the seriousness of the matter. As prejudice certainly encompasses generalising stances, fear demands a thorough assessment. This is not to say that fear by no means induces prejudice, it is rather the discursive formulation – either specific or generalising – that should bring back any conceptual stretching of the already aching term of 'Islamophobia', which is still widely used publicly. Islamophobia is a 'mainstream' problem for European societies and primarily a product of discursive opportunity structures, i.e., majority-oriented public discourses in the mass media enable framing practices and the creation of 'virtual Islam'. It is embedded in structures of meanings and the possibility to diffuse: the term Islamophobia gathered momentum because of its discursive possibilities. The generalising tendency of Islamophobia can be explained as a tool to construct the European Muslim. The Orientalist fabrication as a means of creating a sense of the self by social constructivism creates Islam as an identity category and boundary marker in European societies (Adamson, 2005). "There is a considerable number of authors on Islam who argue that with the spread of modern mass-media and the continuous process of globalisation, normative religious frameworks have been critically undermined and there is a gradual retreat of religion from the public realm [breeding forms of] individualised 'copy-paste- Islam', especially among young Muslims" (Sunier, 2012, p. 197). If this trend continues to gain momentum, any discursive intervention must be conceived with caution.

# b. Discussion and new insights

Numerous scholars and policymakers have pointed to the emerging research agenda and political implications of Muslims residing in West secular Europe respectively (Meghan Benton & Nielsen, 2013). Consequently, the main issues and concerns that fall between the 'Europeanisation of Islam' and 'Islamisation of Europe' are publicly discussed. This search aimed to explore how the accommodation and protection of Muslims' 'Muslimness' resonate publicly. In doing so, based on "classifying or categorising individual pieces of data" (Babbie, 2015, p. 396) or coding decisions, similar 'archives' can be compared that provide room for choosing frames. While the position of religion, and new religions in particular, differ across countries institutionally, arguably many discursive frames do not directly relate to church-state relations. I foresee that the institutional determinants - say the extent in which a particular practice is allowed - undergird the discursive field rationally through conceptions of national identity, citizenship and church-state relations. At the same time, the public media debate is the ultimate instrument for "discursively giving public visibility and legitimacy to certain behaviours, opinions and expressions, while marginalizing or stigmatising others" (Tillie et al., 2013, p. 14). In other words, the conceptions on church-state relations are neither homogeneous nor positive (see Appendix 7 on p. 130) and thus dissensions certainly also exist within the host countries' non-Muslim majority. The same holds for national identity conceptions in relation to immigrants (see Table 18 and 20 on pp. 49-51) as well cross-nationally as within countries.

The data shows that the both ends of the interactive spectrum resonate differently regards the various categorised dimensions in the four selected countries. The number of claims per category and thus public visibility and position towards the subject-matter can be considered as key indicators. The mechanism as to what can be legitimately thought of and felt – i.e., the rationalisation and emotionalisation – is not explicated by the provided data. However, those on the meso- and micro-level are subjected to the same structures. Whereas fixed and contextual factors determine the discursive opportunity structure over time, the publicly visible claims by all collective actors in mass media embody the discursive opportunities. I contend that – for meso-level actors, typically social movements – the media structure is an uncertainty while media gatekeepers play a big role with their news selection and processing.

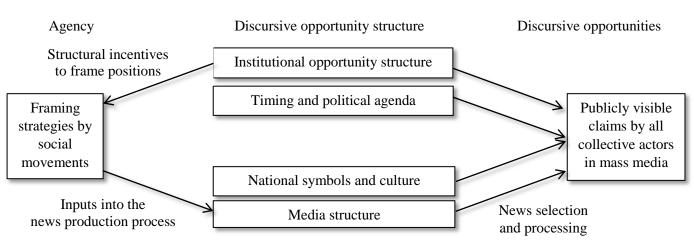


Figure 8: Components of the discursive opportunity structure

Source: (Motta, 2015, p. 581)

I indeed suggest that claims framed in a cultural-resonant way are more promising. From there, the four main components of the discursive opportunity structure determined the panoramic overview of

claims by collective actors, that is, the outcome or actual discursive opportunities as a reality. However, the institutional opportunity structures as national points of reference do not fix the discursive interventions in a unified direction. It is therefore that no explicitly clear picture can be drawn from Statham's categorisation based on the degree to which Christian religions are privileged and Muslim group rights are accommodated and the discursive trends related to Islamic religious practices. No doubt, we see that the rights inside public institutions are more negatively assessed in France than those outside public institutions, but still score on average a higher position than rights outside public institutions in Germany. Like there is no blueprint for accommodating Islam within European host societies, there is no clear monotonous reflection between the institutional structures and discursive opportunities.

The object and frame - or who and what we are talking about - in this search depend on coding. As Shadid (2005) claims that media-induced stereotypes, 'self-fulfilling prophecies' and negative reporting on Muslims and Islam in general can have aggravated consequences (Shadid, 2005), we must find the origins not simply and solely in the theoretical pillars used to describe 'ingroup' 'out-group' rationales and intolerance. The data shows that just in Germany the overall discursive trend is negative, while the other countries' claims score more 'pro-Muslim/Islam' positions that 'anti-Muslim/Islam'. From here, I suggest that it is indeed the frame – as "feature which marks a transition from one section of discourse to another" or "an underlying conceptual structure into which the meanings of a number of related words fit" (OxfordDictionary, 2018 n.p.) - plays a significant role. This implies that certain concepts, based on Western liberal values and principles, encompass negative connotations, like extremism, discrimination, stigmatisation, Islamophobia and violence, while the overall message might entail an overall 'pro-Muslim/Islam' position by advocating against any perceived negativity. In other words, as the institutional structures are not monotonous and fully reflected in the discursive fields - and given that the timing and political agenda, and national symbols and culture are accessible for all – the explanatory value of the media structure should not be underestimated. One cannot ignore the essence of 'double priming', since negative messages work both ways due to the objectification-induced classifications and legitimise 'in-group' 'out-group' rationales. "Priming occurs when news content suggests to news audiences that they ought to use specific issues as benchmarks for evaluating the performance" (Scheufele & Tewksbury, 2006, p. 11) functioning or position of a phenomenon, individual or group. Since Muslims tend to read newspapers in French, Dutch, British or German, they certainly got exposed to that what is said and written, thus they perceive the four pillars of the discursive opportunity structure in one way or another (see Appendix 14 on p. 144). Fact is that the panoramic overview of discursive interventions determines Muslims position vis-à-vis the discursive sphere rationally and emotionally. According to the Migration Policy Institute (MPI), the four selected countries contain varying amounts of ethnic family migrants (MPI, 2017). Such huge discrepancies between countries as to ethnic family-category surely not all Muslims - have several implications summarised by Statham and Tillie: "[f]or some European Muslims, different migration backgrounds will play an important role in separating them from other Muslims, but for others, different streams and schools of thought within Islam might be more important than ethnicity or country of origin" (Statham & Tillie, 2016, p. 184). In other words, even Muslims within the same ethnic family could differ along several lines. This again signifies the level of analysis problem that arises due to demarcated boundaries between majority populations and individuals of immigrant origin across west secular Europe.

France's and Germany's multicultural approaches are relatively closed forasmuch granting group demands and promoting the organisation and institutionalisation of migrant groups along ethnic lines compared to the Netherlands and the United Kingdom. Controversy is a product of opportunity structures defined by different institutional contexts. Therefore the degree of institutional or legal separation of church and state define contextual points of reference (Pollack & Pickel, 2009). As the data analysis has shown, the most contentious group rights for Muslims are mosque building, teachers wearing Islamic religious symbols and veils in particular, and Islamic religious classes in schools. This search focused on the informal public sphere, where not just institutions but rather mentalities trigger dynamic discourses. One of the main concerns centre on the nature of group rights in that – if granted – it "goes beyond the set of common civil and political rights of individual citizenship that are protected in all liberal democracies" (Statham, 2016, p. 218) and so whether is actually promotes integration or disintegration. On the other hand, public opinion, and with it majority-minority

divisions, indicates to which extent a society as a whole is inclusive and equally important perceived as inclusive. Such public interplays furthermore suggest the necessity for future legislation (Van der Noll & Saroglou, 2015).

The main argument – without discussing the threshold and mechanisms of media selectivity – is that indeed public debates shape individuals' opinions on the relevant subject-matter. Of course, that what is said and written and so provide frames in the mass media encapsulate ordinary people's frames. "[N]egative articles remain in people's memory because they arouse strong emotions; a well know psychological phenomena called 'priming'" (Tillie et al., 2013, p. 76). Frames *an sich* could entail a negative image that triggers priming rather than disqualifying extremism, discrimination, stigmatisation or Islamophobia. Discursive opportunity structure theory is arguably not fully developed, accepted and embraced in a way that it serves as an undisputed explanatory tool. One crucial methodological question remains, how to connect the discourse level of context (macro-level) with the framing of social movement at the meso-level" (Baumgarten & Ullrich, 2016, p. 6; Sandberg, 2006). Discussions regarding the representativeness of Muslim Councils are common, as to appointments of presidents, elections and whether or not all Muslims feel represented after all (Cesari, 2014). "In contrast to Catholicism, the Islamic religion is not conducive to large-scale collective action [...] It is a decentralised, non-hierarchical religion with multiple, competing schools [...] and has no central authority to enforce cooperation or structure activity" (Warner & Wenner, 2006, p. 461).

## An emerging research agenda

But how do those trends relate to the current and future research agenda? If civilisations not solely clash along political and ideological lines, states' apparatuses have to modify their position vis-à-vis the publics. "The perspective of post-national citizenship (Sassen, 2002) emphasises the role of supranational authorities such as the European Union and the legal frameworks associated with them, which are said to increasingly constrain nation-states in implementing restrictive policies regarding immigrant and cultural minority rights" (WZB, 2017). The question however is to what extent such political-legal discourses can align with cultural-religious ones, and whether religiously informed conflicts are sui generis or not (Brubaker, 2015). Likewise, from a democratic liberalism perspective, more convergence between countries forasmuch the protection of religious minorities is expected too, driven by fundamental principles of equality. As the accommodation of Islamic religious practices and protection rights for religious minorities have been institutionalised incrementally across all four countries during the last four decades, the influence of discursive trends is ambiguous on the national level. It is therefore straightforward to say that secularisation thesis transforms from descriptive to normative term because there is a "cultural bias in favour of Protestant-Christian conceptions of what religion is and what legitimate religious expressions are (e.g., "belief-centred conceptions"), may disadvantage newcomers" (Maussen, 2015, p. 81). Secularists argue that cultural rights must be rejected "because these would give rise to parallel societies - to "small, self-isolated social groups, each of which adheres to a different norm" (as cited in Habermas, 2008, p. 25). This reasoning overlaps with the stance that granting many religious rights to a new religion discourages integration. So national path dependence based on national traditions of citizenship and identity, the secularist Frenchman could label the Dutch multiculturalism or group-based pluralism as "racism of the antiracists" (Bruckner, 2007). From there, I suggest that the discursive playing field on Islamic religious rights as feedback mechanism indicates and signals the battle between multiculturalists and secularists, centring on the essence of the core values of the Enlightenment (Habermas, 2008). Such discussions on the institutional side of matters do not necessarily find explicitly clear and monotonous reflections in the discursive realm.

Future research projects on discourses of power and interaction must identify what structures undergird 'the archive'. As Baumgarten and Ullrich (2016) suggest, analysing discourse as governmentality should be linked to "related subjectivity or development, enforcement and change with protest motivation, behaviour, likelihood and success" (Baumgarten & Ullrich, 2016, p. 12) and the possibility of social critique. The theoretical boundlessness of the discursive realm, that is, everything that can be rationalised and emotionalised, finds its way in other forms too. For instance, a research project on the 'online social media as discursive opportunity structure for attacks against refugee housing facilities' to "explore how discourses on immigrants and refugees are constructed and

developed in extreme-right online forums, and how such discourses change over time and diffuse to a broader online public" with "[t]he main theoretical contribution here is to develop the notion of discursive opportunities with respect to the context provided by social media" (SOCAV, 2016).

Another sphere of interest is indeed the particularising stances versus generalising stances debate (Brubaker, 2015, p. 2) in religious-induced political conflicts and essentially where authority is located. Who has the right to say what about a particular subject-matter depends on internal knowledge and communication of social movements. The various actor categories in the discursive realm have different perceptual positions towards one another, meaning that actors possess different legitimate resources. This implies that – if Muslim minorities trust state institutions more so than the general public (FRA, 2016) – a different evaluation of claims follow; level of analysis problem because discursive opportunity structures are certainly influential on "the attitudes and behaviour of individual citizens, regarding perceptions of socio-cultural distance and interactions between Muslims and members of national majorities in European societies" (Statham & Tillie, 2016, p. 182). New research should include operationalisations between the panoramic overview of prevailing discourse and the perceptions thereof, ultimately showing overlapping and diverging themes.

Another relevant gap is the extent of discontentment of European Muslims with their respective Muslim Councils and the emergence of a transnational Islamic networks (Allievi & Nielsen, 2003; Gul, 2010) as there exist several differences when it comes to the perceived attitudes of other groups' perception on the role of religion in society (see Appendix 7 on p. 130). Fiona Adamson is right when she points to "a lack of theory regarding the relationship between individual agents and global ideological structures" (Adamson, 2005, p. 547) and thus possibly the emergence and development of Political Islam in it. The interplay between the 'Europeanisation of Islam' and the emergence of Islam as a transnational political force (Meijer, 2009) expanded the competition between states and communities beyond territorial setting (Appadurai, 2006; Mavelli, 2013). In other words, what are the push and pull factors of particular transnational Islamic branches and Western secular European states? So essentially, it is a battle between on the one hand tantamount dialogues and bottom-up initiatives versus the extensive exchange of concerns related to problems, interests and social and identity entanglements which are not bound by geographical boundaries. Such diffused concerns reinforce "the isolation of minorities and their separation from national frameworks, and the values and traditions of the societies in which they live" (International Conference Working Paper On Islam and Political Islam in Europe, 2017, p. 1).

c. Arguments and practical relevance of the findings

Muslims tend to see themselves rather as a person of their country of origin than a person of their respective host country in all four countries, although with different discrepancies as shown in the table below.

	μ See yourself as a person of host country?	μ See yourself as a person of country of origin?
France	2.7196	1.7687
The Netherlands	2.4267	2.2975
The United Kingdom	3.1682	1.6262
Germany	3.1885	1.9201

Table 47a: Mean scores as to perception of person of host country or country of origin

(1) Very strongly; (2) Strongly; (3) Somewhat; (4) Hardly; (5) Not at all

It is not surprising that Muslims who read newspapers always – either at least mostly – in their host country's language tend to see themselves more as a person of their respective host country than those who do not or to a lesser extent.

			95% Confidence Interval	
In which language do you read newspapers or watch television?	Mean	Std. Err.	Lower Bound	Upper Bound
Always in French/Dutch/English/German	2,372	,027	2,319	2,425
Mostly in French/Dutch/English/German	2,553	,036	2,484	2,623
Equally often in French/Dutch/English/German and parents' mother tongue	3,020	,028	2,965	3,075
Mostly my parents' mother tongue	3,566	,046	3,476	3,656
Always in my parents' mother tongue	3,916	,062	3,796	4,037

Table 47b: Mean scores as to perception of person of host country and newspaper's language Dependent Variable: *See yourself as a person of host country?* 

Source: (Jacobs & Koomen, 2011)

Table 47a shows the pivot and essence of the fierce debates on pure forms of multiculturalism and strictness of secularism. Non-discriminatory modes as to the degree to which Christian religious rights are privileged might have a bigger effect on identifying with one's host country than the actual accommodation of Islamic religious practices. It is therefore that "national path dependence and the resilience of national traditions of citizenship and national identity" (WZB, 2017, n.p.) can be observed institutionally, but also on mentalities. Overall, French and Dutch Muslims seem to identify more strongly with their respective host countries than British and German Muslims, as being subjected respectively to a secularist undifferentiated citizenship model and multiculturalism or group-based pluralism. That is to say that centre-staging the accommodation of Islamic religious practices is defect by overlooking the parameters for self- and other-identifications.

The informal discursive playing field is arguably very dynamic and therefore excellently displays which matters resonate well, while others do not. Both ends of the interactive spectrum - the accommodation of Islamic religious rights and anti-Islamophobia – resonate both very well, explicated by the number of claims for both ends. The discursive playing field is considered as the main stage of communication between Muslim minorities and non-Muslim majorities. "Since the linguistic and cultural turn in social sciences, much has been said about the exclusionary effects of discourse as well as its emancipatory power" (Motta, 2015, p. 577). That what is sensible, realistic and legitimate in a certain polity at a specific time builds up and is created by hegemonic ideas (Koopmans & Statham, 1999). Elements as political decisions, legal texts, national socio-cultural discourses and certainly the structure and selection mechanisms of mass media are crucial in determining contestation, the processes of dissonance and consonance and eventually the visibility of main trends. In other words, social movements rely on structures; strategically frame their actions if at all<sup>54</sup>. Also mass media as main supplier of accessible and visible political information and therefore conceptual and cognitive frameworks that dominate native majorities' positions (Koopmans & Statham, 2010). Distinct modes of living and particularly different perceptions of legitimacy and impartiality of state actors forecasted in the discursive realm could potentially foster segregation. Public debates have "a sharper tone since the terrorist attacks of 9/11. In the Netherlands the murder of Theo van Gogh kindled a passionate public discourse, as did the affair with the Mohammad cartoons in Denmark. These debates assumed a quality of their own; their ripples have spread beyond national borders to unleash a European-wide debate" (Habermas, 2008, p. 21). 'Islamic extremism and violence' as main form of Islamophobia echoed on its own and changed debates on the 'Europeanisation of Islam' and 'Islamisation of Europe'.

Social science as platform for explaining social phenomena runs parallel, explicating the relevance of developing the theory of discursive opportunity structure more thoroughly. Especially when it comes to methodological concerns because every statement must be analysed "in the exact specificity of its occurrence; determine its conditions of existence, fix at least its limits, establish its correlations with other statements that may be connected with it, and show what other forms of statement it excludes" (Foucault, 2012, pp. 30-31). Hence, "the rules of formation operate not only in the mind or consciousness of individuals, but in discourse itself; they operate therefore, according to a sort of uniform anonymity, on all individuals who undertake to speak in [a particular] discursive field.

<sup>&</sup>lt;sup>54</sup> "Mediating between structure and action – between the discursive opportunity structure and strategic framing by actors – are the selective mechanisms that affect the chances of social movements' frames in the public sphere" (Motta, 2015, pp. 580-581).

On the other hand, one does not suppose them to be universally valid for every domain; one always describes them in particular discursive fields, and one does not accord them at the outset indefinite possibilities of extension" (Ibid., pp. 69-70). From there, it is close to impossible to construct a methodological tool that encompasses all conditions. In the same way, the term Islamophobia gained momentum over the years in some sort of uniform anonymity. The term is so widely used and still lacks one agreed-upon definition, which points to a perceived truth and irrationality at the same time. Islamophobia as ideational sphere needs a judicial - and therefore rational - conceptualisation without the religious determinant, because the term "Islamophobia, which implies that Muslims are racialised and 'othered' as a group, is therefore controversial" (Jackson, 2017, p. 11). Discursively, we need to get rid of the concept Islamophobia. "The legitimacy of Islamophobia as a concept has been challenged ever since 1997, when it was introduced in public debate" (Bayraklı & Hafez, 2016, p. 160) for numerous reasons. The mere fact that Islamophobia as noun encompasses the quality to open the door for prejudice, since it addresses and entire belief system and so those who follow Islam as essentialised group. This means that we ought to alter our ways of speaking about religion, Islam and Muslims, so that we "describe the person - if needed - as, say, a person who follows Islam, thus emphasizing that *person* is the relevant kind sortal, and that *following Islam* is a particular property that the individual happens to possess" (Leslie, 2017, n.p.).

For both ends of the interactive spectrum, important questions to consider are "whether the potential benefits of policies explicitly or implicitly directed toward a minority group outweigh the risks of stigmatising Muslims. Legislating for cultural norms risks being seen as heavy-handed and intolerant, and plays into the hands of extremists looking for material to sustain a narrative about the victimization of Muslims by the West" (Meghan Benton & Nielsen, 2013, n.p.). At the same time, the essence of public support should not be underestimated. Shown by the explored data, "[d]escribing Muslims either as an ethnic or religious minority is inherently problematic. Ethnically, Muslims are highly diverse, [...] belong to a variety of denominations, and their religious commitment varies. Nonetheless, as Muslims are a singular category in the eyes of the public and governments" (Meghan Benton & Nielsen, 2013). From there, stating that a 'clash of civilisations,' is triggered since "Islamic fundamentalism has given an aim and a form to the otherwise aimless and formless resentment and anger of the Muslim masses" (B. Lewis, 1990, p. 8 as cited in Leslie, 2017) is too simplistic. Still generalisations and unspecified claims point to Muslims as essentialised group and so provides the brainchild that "Islam is seen as monolithic and static" (RunnymedeTrustReport, 1997, p. 4).

In line with Statham's typology – along the lines of degrees to which Muslim group rights are accommodated and degrees to which Christian religions are privileged – and the observed data, some insights deserve attention. Christian religions are to a lesser extent privileged in France and the Netherlands (Statham, 2016) while French and Dutch natives are more convinced about Muslims' willingness to adopt customs of host countries (see Table 30 on p. 59). Overall identification with host country does not explicitly rely on the accommodation of Islamic religious practices, as French Muslims seem to feel more strongly a person of their host country than Muslims in the Netherlands, the United Kingdom and Germany. Given the above analysis, I suggest that the protection of Muslims' 'Muslimness' is perceived as more important than the accommodation of Muslims' 'Muslimness'. The minimal definition of 'protection' is the degree to which Christian religions are privileged and with it a sense of equity. Furthermore, I foresee more opportunities for Muslims institutionally than discursively, in both spheres. Overall, Muslims' opportunities in all four countries can be ordered – based on auspiciousness – as follows; protection institutionally, accommodation discursively, and protection discursively.

Institutionally, there are more opportunities for Muslim minorities, whereas basic human rights are self-evidently formally more protective than accommodative religious minority rights. Future research might consider where exactly protection shades into accommodation, where it overlaps, whether protection is exigency to accommodation, and whether Islamic religious practices are considered primarily as tool of recognition or rather as self-fulfilment, that is, fulfilling one's 'Muslimness'. Such studies must have a cross-national nature too – although the accommodating turn during the last decades can be primarily explained as response to Muslims' numerical significance and demographic growth – I consider national path dependency as driving force institutionally in the near future. "Issues related to religious rights and minority social problems are major issues within this field, and therefore questions regarding Muslims in Europe are strongly tied to national characteristics

and traditions, with supranational actors playing a small role in the integration debate" (CORDIS, 2014a). On the contrary, anti-Islamophobic discourse has relatively more potency in a post-national citizenship trajectory, emphasising indeed the legal frameworks of supranational authorities, primarily the European Union, that upholds democratic and liberal principles. Fundamental Rights Agency of the European Union (FRA) is such a 'post-national citizenship' project. The Agency's "role as surveillance highlights the nature of the Agency's rights discourse as a disciplinary and governing discourse" (Sokhi-Bulley, 2011, p. 704). Whether the FRA actually functions according to the panoptic model has to be seen, as the subjectification of member states – in a principal-agent fashion – not necessarily passes through society as a whole. On the meso-level, one can hear oftentimes the essence of dialogues as main form of building bridges between Muslim minorities and non-Muslim majority. However, if the public debate is the main source of information for both actor categories, problems arise due to generalising tendencies; claims must be more specific as to the object. It is therefore all but surprising that Shadid advocates for structural improvements in the media as social institution (Shadid, 2005). Media as social institution has the responsibility to serve essential facts, balance between actual discourse and thus controversy as edge of the bounded sphere, i.e., what can be said and thought of in a particular space and time. Objectivity, impartiality and neutrality within the media structure do not preclude coverage or visibility biases, gatekeepers' selectivity biases, or statement biases (D'Alessio & Allen, 2000) triggering questions concerning media law (Habermas, 2006). As Van Heelsum & Koomen (2011) stated - in their integrated report on interviews with Muslim leaders as part of the EURISLAM project - it might be difficult to get in touch with certain Muslim organisations. Essentially, because they dislike the idea of being subjected to research based on religiosity or ethnicity, or rather mistrust and frames used in the public debates on Muslims. In my search, I encountered the same problems and received too less input to amplify their positions (see Appendix 18 on p. 155). As not solely the cultural differences, but also the perceptions thereof are foundational forasmuch interactions between Muslim minorities and non-Muslim majorities. Future research must therefore, in a EURISLAM-fashion, incorporate the 'perception-variable' into social movement studies, moving away from monotonous rational actor explanations. Discursive opportunity structure theory in relation to pacifying relations between Muslim minorities and non-Muslim majorities might be developed inductively in a bottom-up fashion. Because if indeed "[f]undamentalism means deculturation" (Roy, 2013, p. 5) we ought to know where deculturation begins and how deculturation relates to the protection and accommodation of Muslim minorities' 'Muslimness'. Analysing the interactional dynamics between non-Muslim majority and Muslim minorities along the 'protection-accommodation-spectrum' is fruitful. "A popular view among journalists and experts is that of Islamic terrorism as an expression of the Muslim wrath" (Richardson, 2013, p. 159). If this wrath and also radicalisation is indeed primarily fuelled by the processes of deculturation and individualisation and has nothing to do with Islam as culture (Roy, 2015), then we must consider the side effects of ethno-cultural narratives. How this relates to secularisms and the protection and accommodation of Muslims' 'Muslimness' balances institutionally and discursively between "making room for Islam in the West as a Western religion among others - not as the expression of an ethnocultural community [...]" (Richardson, 2013, p. 168) and working together in such a way that undermines "foreign connections and instead integrating Muslims and community leaders on a pluralist basis" (Ibid., p. 8). Consequently, the essence of seeking for an ummah - albeit a territorial or virtual one – becomes void; the first step in creating the European Muslim.

#### Policy recommendations

This analysis argues that opportunities for Muslim minorities in West secular Europe – based on the picked frames – can be ordered as follows: protection institutionally, accommodation institutionally, accommodation discursively, and protection discursively. Islamic religious rights, as dominant theme of integration within public debates – next to minority social problems – points to the relative importance of this frame vis-à-vis other frames. Also the scope of the claimant actor points to the trend that religious rights remain primarily a national affair (see Appendix 16 on p. 146). Therefore, national symbols, culture and the respective institutional structure are the frames in which opportunities are to be found. This however, does not imply that public institutions must be considered as the sole possible addressees of claims. Muslim organisations ought to broader their perspectives as to network-building

with other civil society actors on matters that are not directly or primarily related to religious interests. Such interactions might not be principal, but certainly helps "to develop a broader social and political capital and, on the other hand, to have a public visibility not only linked to religious issues" (Tillie et al., 2013, p. 101). In other words, a dynamic discursive playing field demands dynamic involvement of Muslim actors, that is, its involvement in a variety of issues rather than simply religious interest and the position of Islam within society. Overall, within the given discursive structures, Muslim minorities have room for manoeuvre, albeit directly or indirectly, also to mobilise horizontally next to solely addressing their issue to public institutions. Within the media structure, claims with a political nature. the addressee and object actor need to be clear and as explicit as possible. This provides clarity and so prevents any possible generalising scenario to flourish. This stance stems from the premise that integration policies ought to be based upon individual traits rather than group elements such as 'Muslimness'. Hence, it is not surprising that suggestions as "the setting up of a more powerful independent press watchdog" (Bayrakli & Hafez, 2016, p. 570) circulate. Also, there is room for more technocracy within the public debates. Professional organisations, research institutes, individual intellectuals, experts and think tanks specialised on the subject-matter - albeit human rights or interactional dynamics - might have crucial and research backed insights that deserve chances of diffusion.

Many insights as to the integration of Muslim minorities rest on the provided room for manoeuvre. As there is no explicit blueprint for integrating Muslim minorities, it is all but surprising that states maintain different strategies; there is no consensus on best practice. Study the essential differences between 'symbolic' and 'security' threats related to Muslims' presence in West secular Europe. Hence, clear demarcations can be imposed on what relates to perceived realities and national security concerns, that is, what is constitutional or constitutes to fundamental human rights, and what is not. In other words, the institutionalisation and usage of the concept 'Islamophobia', as fear, must be as close as possible to security threats. In the same way, all that what is considered as 'symbolic' – and so triggers perceived realities – must be approached in the light of deculturation. With this, I suppose that secularisms "must be unceasingly clarified as meaning: (1) the neutrality of the state and (2) freedom of religion rather than freedom from religion" (Bayrakli & Hafez, 2016, p. 176), so that the Muslim communities find their room for manoeuvre, especially in counteracting deculturation. Such a strategy would also be useful when it comes to the clarification of 'physical' and 'virtual Islam' and so visions on that what is considered as 'Islamic' and that what is 'Islamicised' in European societies. Essentially, secularisms provide religious denominations to be autonomous within the limits. The neutrality of the state principle along with the absence of a legal definition of Islamophobia, paves the way for the Muslim communities to 'own' Islamophobic phenomena. With 'owning' the phenomena, I suggest that Muslim communities and representatives make it their own responsibility to reinforce their instruments in combatting such phenomena, ideally by creating alliances to strengthen their discursive resources.

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#### 7. Appendix

Appendix 1: Institutional opportunity structure or narrow political opportunity structure

The creation and recognition of Islamic representative bodies for Muslim communities in secular Western Europe demanded a re-evaluation of institutional arrangements for this religious minority. A political shift took place during the 1990s in West Europe; when the underdevelopment of Islamic religious infrastructure on the one hand, and the extemporaneous demographic increase of Muslims on the other hand, put pressure on political authorities. This re-evaluation was characterised by several parallel features, that is, trial-and-error resulted in several analogous characteristics in state-Muslim relations across Europe. The institutionalisation of religious practices and accommodation of communication channels will be discussed in more detail below. It suffices here to say that the emancipation of Europe's Muslims must be considered as an initiation of a formal process in which Muslims enter the secular democratic order (Laurence, 2011) and "that the political context sets the parameters within which political participation and mobilization occur" (Cinalli & Giugni, 2011, p. 43).

We can understand institutional opportunity structures regarding Muslim emancipation "as state policies and legal frameworks relating to citizenship, cultural difference, and church-state relations" (Tillie et al., 2013, p. 13). In other words, they are exogenous aspects that constrain or enable Islamic social movements to act collectively for a certain purpose. Exogenous determinants imply social movements' reliance on several structures when it comes to successfully entering the political arena, and eventually their claim-making prospects. This rather narrow institutionalism foresees and emphasises the political institutions as mechanism and structures of the social order that are believed to govern behavioural traits of social movements and individuals. "The structural approach to social movements maintains [...] attempts to demonstrate empirically those individual behaviours are channelled by a series of structural constraints" (M. G. Giugni, 1998, p. 367). Political institutions are thus believed to be among the principal sources of structural constraints faced by those in extra-parliamentary spheres. If we adhere to this notion of institutional opportunity structures, then we cannot ignore the fact that clear formal demarcations embody a significant deal in social movements' opportunities. In other words, inside-outside classifications forasmuch citizenship, culture and the separation of public and religious private life are crucial parameters and contextualise particularly religious social movements' positions vis-à-vis institutions. The premise of these 'insideoutside' conceptions incited two related theoretical traditions with regard to social movements' configurations, culture and structure.

First, the value-oriented perspective emphasises that "symbolic configurations or formations that constrain and enable action by structuring actors' normative commitments and their understandings of the world and of their own possibilities within it" (Emirbayer & Goodwin, 1996, p. 365). The guiding principle here is that cultural commitment along with its set of internalised norms and values motivate actors. This is in line with Durkheim's reasoning of how social solidarities become solidified and consequently institutions or reoccurring patterns of behaviour. This value-oriented perspective, however, get challenged when 'inside cultural commitments' face 'outside institutional constraints', that is, voluntary value-based action faces institutional obstacles. This ambiguity is twofold. Either, institutional obstacles trigger behaviour modification indicating the abstractness of culture per se and bringing more general norms of conduct. Or, institutional obstacles function as points of reference that results in a deterministic view of culture, from within as well as from the outside. This value-oriented approach relates to macro-structural changes and thus suits the interactional dynamics between new cultural orientations, driven by their internalised cultural commitments, and societies challenged by those new emergent needs. Thus, "value-oriented movements tend to be revolutionary or transformative" (Buechler, 2016, p. 100).

Second, the framing perspective focuses rather on meso-and micro-levels. This approach stresses the relations between social movement's schemes of interpretations of objective facts and events, and social movements' actions within the same field of interest. In other words, this perspective links different frames, so that, for instance, a master frame as a generic type of *collective action frame* that is wide in scope influences rather run-of-the-mill social movement frames (Snow & Benford, 1992). This perspective is based on the idea that framing as such is a cultural phenomenon

and thus turns "attention to the relationship between cultural elements and their transposition into action" (M. G. Giugni, 1998, p. 369) because in order "to explain mobilization one needs to understand the 'framing' or discursive construction of issues" (Bröer & Duyvendak, 2009, p. 337). This quality, along with different levels of analysis, puts an emphasis on the influence of discursive aspects on social movements, because it includes a wide range of cultural incentives. This means that social movements create strategies based on frames accumulation, so that problems could be formulated and collective action is legitimised and needed.

Both, the value-oriented and framing perspective are not mutually exclusive, as both traditions strive to explain social movements' configurations, culture, structure and strategic action on different levels. It is the macro-structural context defined as institutional opportunity structure based on 'insideoutside' conceptions that constrain and enable actions by actors driven by their normative commitments. Moreover, the attitudes and behaviour of individual, say the micro-individual level, and positions of representative collective actors on the meso-level, are based on interpretative framing practices. Thus, both traditions have explanatory value when it comes to social movements' relational position vis-à-vis others. The value-oriented strand strives to contextualise social movements' normative and cultural positions pertaining to macro-structural institutions, while the framing perspective sees collective actors' framing as a form of cultural interaction with other frames on the same meso-and micro-level. Based on the theoretical model used for the EURISLAM project, and the yet underdeveloped link between institutional opportunity structure and framing practices, the "notion of discursive opportunities may help to bridge [this gap] in the social movement literature" (Koopmans & Olzak, 2004, p. 224). However, before we turn to the notion and theoretical dimensions of discursive opportunity structure, we first need to dive into the defining dimensions of the institutional field when it comes to Muslim religious accommodation, particularly church-state regimes.

Macro-structural context	Meso-level (of collective actors)	Micro-individual level	
Institutional opportunity structure	Policy makers	Attitudes and behaviour of host society population	
Value-oriented perspective Discursive opportunity structure	Representatives of Muslim organisations Framing	Attitudes and behaviour of Muslims perspective	

Figure 1.1: Structures and perspectives

Source: (Tillie et al., 2013, p. 15 - *both perspectives added*)

#### Institutional indicators and opportunity structures

This sub-section explores the main institutional indicators that impact Muslim minorities and thus embody the formal milieus in which European Muslims find themselves, eventually bringing opportunities or constraints. As pointed out earlier, the accommodation of religious rights has been a top-down process as by legitimising an Islamic collective identity, state authorities secured the incorporation of Islam in pre-existing church-state relations and thus keeping religion outside the public realm (Modood & Kastoryano, 2006) as much as possible. Societies are composed of naturally occurring or secondary societies. Those secondary societies form the principal condition for a higher organisation. In other words, a state's authoritative administration only functionally exists when secondary societies are in play. The growing Muslim population not solely forced states to set Islamic religious accommodation on the political agenda; it also provided an opportunity to arrange the relation between the state and the individual. States did so by presenting a wide range of citizenship rights, including cultural and religious rights. This search its prime focus is on Muslims' perceptual

assessment of their opportunities in France, the Netherlands, the United Kingdom and Germany. It is therefore essential to understand their relational positions towards both, the macro-structural institutional and the informal discursive realm. From here, states' coordination of citizenship rights refers to individual rights and group rights. Individual rights are essentially centred on the access to the national community, as they "include non-cultural measurements on the provision of legal residency, work permits, naturalisation and family reunion" (Koomen et al., 2013, pp. 197-198). Group rights analyses the accommodation and limitations of collective resources and rights based on a common characteristic. Overall, formal institutions related to citizenship, cultural difference and church-state relations define institutional opportunities for Muslim minorities.

Individual rights encompass three broad dimensions, to wit nationality acquisition, citizenship rights for foreign nationals and anti-discrimination laws. Those three dimensions can be subdivided by different indicators that eventually point to an open, restrictive or a 'something-in-between' institutional regime. With regard to (1) nationality acquisition, we must consider the (a) the minimum amount of years that immigrants must have been residents before naturalisation can be requested in that particular state; (b) the welfare and social security dependencies in play that possibly could hinder naturalisation; (c) the automatic or facilitated provisions for the naturalisation of second generation migrants; (d) the allowance of dual nationality an sich; and (e) the actual naturalisation rates, for instance, the share of naturalised migrants as a percentage of the overall foreign-born population. "The classical institution of national citizenship understood as a set of institutionalised relations between the state and the individual comprises two elements. These are the rules of formal membership and individual rights through which individuals are incorporated organisationally into the state and the forms of identification with the nation through which individuals are incorporated symbolically" (Koenig, 2015, p. 46). Concerning the (2) citizenship rights for foreign nationals, the following indicators must be studied: (a) the conditions for family reunification of third country nationals, such as age and integration requirements for spouses, income requirements for sponsor, and eligibility of sponsor; (b) the active - and possibly passive - voting rights for foreigners, on local, regional and national level; (c) the conditions for expulsion for criminally convicted and short-term non-national residents, for long-term non-national residents, possibility and likeliness of expulsion, and the role of welfare dependency on expulsion; and (d) the rights of non-citizens to work for public services as police, education and administration. The third dimension - which is interesting with reference to Islamophobia – of (3) antidiscrimination rights consist of the following indicators: (a) the extent of The International Convention on the Elimination of All Forms of Racial Discrimination (ICERD) provisions in criminal law, that is, the extent to which racial hatred is prohibited by criminal law; (b) the extent ICERD provisions concerning discrimination are penalised by criminal law; (c) the scope, extent and types in which discrimination is positioned in civil law. In other words, the spheres – such as employment, housing, social benefits and education – that are covered in antidiscrimination laws and the exemplification of discrimination as religious, racial or ethnic and national forms; and (d) the state-established antidiscrimination agencies and their legal mandate, such as initiating independent investigations.

Arguable, however, the formal institutions related to cultural differences are more controversial than the abovementioned parameters for citizenship opportunities. Because community leaders' "concern is not simply private legal status, but equal recognition and access to representation of their interests within an administrative regime of state-society relations. They re-structure and reorient themselves in response to a perceived political opportunity structure that would allow them to gain representation in institutions and access to organizational resources" (J. Laurence, 2011, p. 130). Cultural differences are, however, difficult to analyse directly vis-à-vis individual citizenship rights. Granting a culturally distinct individual national citizenship does not imply that cultural accommodation automatically follows, while citizenship provides for more associated rights. Hypothetically, more inclusive and open citizenship regimes provide relatively conducive opportunities for Islamic political entrepreneurs. When it comes to dealing directly with the accommodation of Islamic religious practices, integration debates on Muslims, Islam and policies related to cultural rights and requirements are of greater importance than individual rights (Koomen et al., 2013). As states maintain different forms of secularism, there also exist cross-national differences forasmuch the acceptance and institutional allowance of cultural differences as well within as outside public institutions. This controversy becomes visible when religious practices are placed in a cultural

context. As "the political-legal response to [the accommodation of] Islam is encapsulated by the notion 'this is (not) allowed', the cultural-religious response will be more like 'this is the way we do things around here" (Berger, 2013, p. 118). Both responses imply a hierarchy embodied by the state that organises its public along the principles of secularism. The controversy lies in the institutionalisation of the 'this is the way we do things around here' response and thus the cultural difference. However, the term cultural-religious is somewhat skewed exactly because culture is a manmade set norms and values that are shared among a group, which ultimately defines social interaction between individual and group, and citizen and state. Religion, on the other hand, is defined by the relation between God and man. Therefore, the essential difference comes to the fore when one questions the truthfulness and authority of either the state or God, and their relation in secular liberal democracies (Statham et al., 2005). For example, Tariq Ramadan firmly holds that Islam is a religion with universal principles that are applicable in any society and thus the creation of a 'European Muslim' is not an illusion (Ramadan, 2013). On the other side, Mahmood Mamdoui sees Islam inherently as incapable of innovation and unable in facing the challenges of religious liberal thinking. So, Mamdoui justifies the 'cultural talk' by pointing to "the artificial divide between modern and premodern religions and between secularism and Islam" (as cited in Cesari, 2009, p. 1). It is the trust in revelation (Harrod, 2013) where both scholars clash. The framework through which M. Berger (2013) studies the interaction between Islam and Europe contains – besides the two different discourses – two other dimensions, namely that of 'physical' and 'virtual' Islam. Physical Islam is based on all that is directly visible, and thus the mere presence of Muslims is required. This visibility is brought about by behavioural and material expressions, such as prayers, fasting, marital relations and buildings, clothes, and forms of art. In other words, physical Islam is all that can be directly observed in the city, on television or on other media channels. Virtual Islam is an outgrowth of physical Islam, as it encompasses all non-physical or immaterial aspects of Islam, like knowledge, culture, ideas, orthodoxy and messages. Virtual Islam is a more controversial notion than physical Islam, as it denotes "the images and visions of what is considered [to be] 'Islamic' [...] including imagined or real notions of conflicts between" (Berger, 2013, p. 117) Islam and European societies. This distinction between physical and virtual aspects of Islam provides an opportunity to separate neutral observations of religious appearances as expressions and behaviour of Muslims, and the culture-induced assessment thereof.

With regard to cultural difference, five dimensions could be distinguished, namely cultural requirements for residence and naturalisation, religious practice rights outside public institutions. cultural rights and provisions in public institutions, political representation rights, and affirmative action in the public sector. Those five dimensions have in turn different indicators that eventually indicate whether a state maintains an open, moderate or restrictive regime as to cultural difference. When we look for the (1) cultural requirements for residence and naturalisation, two indicators are of importance: (a) the requirements for residence permits regarding civic knowledge and language skills; and (b) the requirements for naturalisation with regard to language skills, civic knowledge, declaration of loyalty, and assimilation. Then, the institutionalisation of (2) religious practice rights outside public institutions can be assessed by looking at (a) the allowance of Islamic ritual slaughter (Dhabīhah) and allowance of Islamic call to prayer (Adhan); (b) the amount of mosques with an appropriate architecture, say dome and minaret in relation to the size of the Muslim population; and (c) the provisions for burial following Islamic rituals (al-Dafin), like separate cemeteries, special sections in public cemeteries, and inhumation without coffin. The wording of 'religious' practice rights 'outside' public institutions and (3) 'cultural' rights and provisions 'in' public institutions is a secular sequel. For this third dimension, eight indicators are of interest, namely (a) the state's recognition and funding of Islamic schools, laws that provide the possibility of such funding, and the number of schools that are funded by the state in relation to the size of Muslim population; (b) the existence of Islamic classes in state schools as substitute for religious education: (c) the right for female teachers to wear headscarves in school; (d) the right for female students to wear headscarves in school; (e) the existence of public broadcasting in which major immigrant languages are leading and the amount of airtime per week; (f) the existence of Islamic religious programmes on public channels and the time devoted to such programmes; (g) the allowance of mother-tongue teachings in school, whether such teachings are provided during regular schools hours and whether or not such teachings are funded by the state; and (h) the provision of state-paid imams in prisons and the army. Furthermore, (4) political representation rights of Muslim minorities are of importance, which is associated with (a) the existence of immigrant consultative bodies on local level and national level, the influence of state in appointing representatives, the share of immigrants that are represented, and the representation of either organisations or individuals; and (b) the existence of a Muslim permanent consultative body on national level; state's influence in appointments, the representation of Muslims, and whether the majority of representatives are individuals or come from organisations. The fifth and lasts dimension is the (5) affirmative action in the public sector, which is based on one indicator, namely (a) the imposed quota or other threshold scheme that ensures minority representation in public sector jobs.

Theorists of multiculturalism pointed that – along with more open regimes concerning individual rights and cultural difference – more and more "new claims for recognition of particularistic cultural or ethnic identities" (Koenig, 2015, p. 43) could be expected (Modood, 1998). Moreover, religious practices play a significant role in constructing migrant identities. This means that states, by means of allowance and accommodation – rig a Muslim identity.

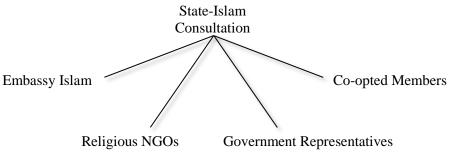
#### Church-state regimes

"The institutionalization of state-church relations can be viewed as the intersection of two vectors: the centripetal force of the modern state and an increasing acknowledgement of the need for extraparliamentary consultation to legitimate and facilitate the increasingly complex work of government" (Laurence, 2011, p. 119). Those two vectors are can respectively be labelled as the coming forward and clarifying of church-state regimes and the incorporation of Islam in it, and the institutionalisation of communication channels between state and Muslim minorities. First, the establishment of Islam Councils are discussed, and thereafter the different church-state regimes in France, the Netherland, the United Kingdom and Germany. Eventually, all four states show different formal forms of accommodating Islam and thus providing different institutional windows for Muslim minorities.

The material shortages of the religious infrastructure in Western Europe in combination with the politicised nature of Islam in the Middle East and Northern Africa brought about spill-over tendencies of Islamic practices into the European public sphere. One important aspect of these Islamic practices can be summarised under the heading of 'visibility' (Berger, 2013; Göle, 2016), say especially headscarves, mosques and minarets triggered tension as the growing gap between European host societies and Muslim minorities became apparent. Europeans' first strategy forasmuch the accommodation of Muslims' needs can be labelled as a 'laissez-faire' approach as European governments permitted foreign governments and non-governmental organisations to shape Muslims' religious and political life. This 'outsourcing', however, seemed problematic when second and third generation immigrants settled in West Europe (Cesari, 2014). The growing presence of Muslim minorities resulted in a newfound sense of ownership during the early 1990s. During this time, preservation of national identity, social cohesion and 'guiding culture' began to dominate public and political discourses, that is, lively debates about Islam's compatibility with Western modes of living. Moreover, political measures such as religious restrictions, civic impositions and state-mosque relations indicated the politicisation of religion and thus the re-negotiation of secularism began. European governments passed restrictive legislation on some Islamic religious practices, such as polygamy and forced marriages, nevertheless it also granted greater religious freedom by means of institutional representation. This double movement say restricting certain practices by law, while tolerating institutional representation signified and reinforced a sense of hierarchy in church-state relations. This is not to say that tolerance of Islamic religious practices has decreased after the 1990s, but merely state's sense of public-private life division and thus the essence of institutionalising this division. As a matter of fact, more and more Islamic religious practices have been allowed ever since the 1990s (Laurence, 2011; Statham, 2016; Statham et al., 2005) by national interior ministries throughout Europe. Moreover, the establishment of Islamic Councils points to the increased relevance of a representative bargain and solid communication channels after all. From here, national governments' strategy was twofold, namely citizenship policies and institutional organisation building ought to integrate Muslims and improve their Islamic accommodation. First, full citizenship implied equality for the law, irrespective of religious ethnicity or nationality. This constitutional equality, however, also implied that secular principles must be adhered. If granted full citizenship, 'a Muslim at home, a man in the street' became the guiding principle, signifying again the public-private division.

Second, Muslim associations' relation with the state became formalised in order to create the institutional conditions for the formation of a French, Dutch, British or German Islam within preexisting church-state regimes. One prominent form of domesticating Islam can be found in the creation of Islamic Councils. First of all, Islamic Councils provided infrastructural practicalities as communication channels enabled governments to get familiar with their residents' needs. Second, Islamic Councils replaced the need for foreign control, also known as *Embassy Islam*, and thus reinforced state-mosque relations (Parsons & Smeeding, 2006). Third, Islamic Councils were typically the culmination of legitimate and moderate interlocutors for a representative bargain. In other words, states pre-programmed their communication partners as Muslim organisations are linked to broader transnational Islamist movements. Islam Councils are the main forums through which states and Muslim organisations cooperate, yet there are several cross-national differences in play when it comes to working agendas and ideological breadth of the participants. Overall, European states aimed to establish representative and moderate interlocutors to provide advice and to emphasise public-private demarcations (Godard, 2007; Haddad & Golson, 2007; Silvestri, 2007).

Figure 1.2: Formula of Islam Councils



Source: (Laurence, 2011, p. 169)

One could state that especially changing the nature of individual Muslim's relation to organised Islam and forcing religious communities to subordinate religious law to national constitutional orders are the main pillars of states' strategy. This implies that accommodation could be understood as a mechanism aimed at ensuring a religious community's adherence to state's authority or a process of political control. The establishment of Islam Councils provided Muslim organisations a new institutional opportunity structure. Moreover, the core of Western Islamism is that Islamist groups avoided passive voting, as they were not primarily interested in electoral politics. Instead, their focus on community organisation and thus the extra-parliamentary domain can be considered as their priority, especially when it became clear that second generations ought to be integrated instead of being subjected to the 'outsourced' Embassy Islam centred on return migration. This new configuration presented two main challenges to Islamic organisations. First, community organisations had to position themselves and their interests in the discourse in order to influence the debate. Second, the institutionalisation of more profound contact with political actors brought about pressure as Islamic organisations had to bear the interests of its members in mind (Kortmann & Rosenow-Williams, 2013b). The logic of membership and the logic of influence – say having members and being member of an institutional system – complicates matters from time to time (Schmitter & Streeck, 1999).

Much is said and written on national strategies to incorporate Islam into national church-state models. This frame is oftentimes considered as foundational and most used school of thought through whom institutional opportunity structure and resource mobilisation can be studied. Church-state regimes are not solely based on states' experienced with intra-Christian pluralism in the past, but also on the relation between state and civil society. In other words, "different institutional arrangements tend to shape the agendas of Islamic mobilisation and claims in different countries" (Cesari 2002 cited in Laurence, 2011, p. 151) and thus religious community's public legal status that enables or hinders paths of claim-making and subsequently institutionalisation of religious practices. Church-state relations define the roles of religion in public life and thus the extent in which secularism can be observed. Secularism, however, is not a fixed ideal (for a comprehensive overview see Mavelli, 2015). Though, generally speaking, secularism is "understood as a principle of separation between state and

religion [that] underpins the nation-state building process, manmade law making, and popular sovereignty" (Göle, 2010, p. 44). Moreover, the right of freedom of religion and religious practices exist throughout Europe, although, states' positions towards organised religion are either unilateral or negotiated. For Ferrari (2002), there are three categories with regard to church-state regimes, namely the 'separation' or 'universal' regime, the 'concordatarian' or 'recognition', and the 'national church' regime (Ferrari, 2002). The separation/universal model, found in France and the Netherlands, guarantees religious equality and so it does not finances religions or recognises advantages of one religion over another. Religious activity, however, is regulated as the state grants as well status as rights to religious organisations and leaders. This also implies that autonomous activities of diverse religious communities are separately organised. Either way, the state coordinates relations with religious representatives. The concordatarian/recognition regimes provide "legal advantages, privileged juridical status, and even significant financial support" (Laurence, 2011, p. 152) to certain churches. This means that church-state relations are principally bilateral in nature, negotiated with each religious group separately. Ferrari regards Germany's church-state model to this category. The United Kingdom belong to the 'national church' category, as the state recognises and also finances just one religion. At the same time, the state "tends to restrict de jure or de facto the institutionalisation of minority religions - though these may obtain simple associational status and a lower tier of rights available in common law" (Ibid., p. 152). The United Kingdom has a state church that simply receives preferential treatment but is subjected to state influence at the same time (Ferrari, 2001, 2002). However, as many analysts argue, those different regimes primarily distinguish states' national experiences with Christian cultures in the past, that is, their road towards 'their' secularisation and neutrality. Moreover, those who observe a 'post-national' world, say those who predict the end of the Westphalian nation-state, are concerned with states' incapability of maintaining church-state regimes per se. Overall, Modood's observation that "mainstream Western secularism cannot be seen as versions of "radical separation", "mutual exclusion" or "radical, ideological secularism" seems valid as there are numerous linkages between state and religion, albeit institutional, symbolic, financial or political (Modood, 2010, p. 6). In other words, "relative separation', 'moderate' and 'pragmatic secularism' seem to be the mainstream interpretation [of secularism] in Western Europe" (Loobuyck et al., 2013, p. 61).

The predominant civic-cultural identification of migrants overlooks the religious aspects, as liberal states uphold freedom of religion. It is therefore that citizenship rights *an sich* have no direct link to religion, while group rights with reference to cultural practices are more contested, and so are Muslim group demands. However, as Carol and Koopmans (2013) state, "access to citizenship can influence debates on Muslims' rights [since] access to certain public positions is tied to citizenship" (Carol & Koopmans, 2013, p. 168) – like voting rights and political participation (Carol, 2016) – and when most Muslims remain non-citizens, the debates are less influenced by their positions. The following paragraphs compare the four selected countries in this regard.

### France's Republican citizenship model and laïcite

France maintains a rather open citizenship regime, which affects many Muslims since France encompasses the largest Muslim population in Western Europe in relative sense (Hackett, 2016). An open citizenship regime on the one hand and a very sharp division between state and church on the other hand, brings about tension concerning visible forms of religiosity in particular. This combination, say the 'feminised' family reunification immigration policy and the increasing visibility of hijabs triggered new public discourse about Islam in France since the 1980s (Geisser, 2010; Helbling, 2014). France's sharp focus on the visibility of religious symbols eventually translated into "two laws, in 2004<sup>55</sup> and 2011<sup>56</sup>, which restrict hijabs in public schools and face-covering hijabs in the public sphere" (Cesari, 2014, p. 33) respectively. The aversion against visible religious symbols in public institutions goes hand in hand with the "dominant French Republican tradition of integration through national institutions like schools, the army, churches, unions, and political parties has created an ideological revulsion toward ethnic categorisations – even towards groups that are considered to be

 <sup>&</sup>lt;sup>55</sup> <u>https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000417977&dateTexte=&categorieLien=id</u>
 <sup>56</sup> <u>https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000022911670</u>

unfit for assimilation" (Lucassen, 2005, p. 186). Ethnic categorisation is against the very essence of the principles stemming from the French Revolution (Koenig, 2015). The French concept of secularism - laïcité - embodies a very restrictive structure for Muslims, as the law - Loi du 9 décembre 1905 concernant la separation des Églises et de l'État<sup>57</sup> – formally separated religion from the public sphere and thus "prevents direct public funding of religious communities" (Statham et al., 2005), meaning that especially Islamic schools rely on financial donations from French Muslim organisations like the UOIF. So, there is no or limited place for religion in public institutions. The ius soli principle applies as to immigrants' access to individual citizenship rights; however naturalisation is conditional on assimilation requirements, as it remains conditional on the 'desire to integrate' (Howard, 2009; Janoski, 2010). France its naturalisation policies have the main intent of making 'Frenchmen out of foreigners' (Ireland, 1994). Making foreigners Frenchmen also implies that the state expects that, after actual naturalisation, those 'new' Frenchmen join the already existing social structures as trade unions, political parties and the like instead of mobilising their ethnic family in establishing new associations. This is why the French approach is characterised by a rather individualistic conception (J. Gilbert & Keane, 2016; Maréchal, 2008) that is, integrating the motivated immigrant instead of making the entire ethnic family feel home. It is therefore not very surprising that ethnic associations were only permitted in 1981 (Hargreaves, 2007). This can be seen as the thread of the French secular republican ideology aimed at a universal and undifferentiated citizenship. The Conseil Français du Culte Musulman (CFCM) - inaugurated in 2003 - became the central representative body for all French Muslims. The CFCM "is part-elected and part-appointed and arranges chaplaincies in the army and prisons, acquires burial sites, grants 'halal' certificates, organises pilgrimages, and builds mosques and prayer halls. This development has not, however, prevented the banning of ostentatious Islamic accoutrements in public life" (Statham et al., 2005, p. 433). The CFCM receives quite some criticism, among others, due to the state's interference in appointing Council president (Cesari, 2014; Haddad & Golson, 2007) and its organisational model is not suitable for the representation of the very diverse Muslim population in France.

With regard to the abovementioned citizenship right and formal institutions concerning cultural difference, the following provisions show why France its approach towards immigrants and religious minorities is one-of-a-kind. In order to naturalise, an immigrant must reside at least five years in France (Fangen, Lynnebakke, & Paasche) and ought to possess material autonomy and sufficient economic means. However, well-integrated foreigners into social life (e.g. trade unions, sport clubs or other memberships) might be partially exempted, as their 'desire to integrate' counts as compensation highlighting individualism. This means that an ensemble of the immigrants social and economic situation are taken into account as there is no clear threshold with regard to welfare or security dependence. France - as a monist state in which "immigrants attempting to be absorbed culturally and socially into the mainstream cultural group" (Liu, 2017, p. 444) - is quite closed with regard to cultural requirements for naturalisation. This because of a one-sided tolerance view, that is, France's culture is the fixed point of reference instead of more subtle forms of interactionism. Second generation immigrants automatically receive the French nationality, meaning that "[c]hildren born in France of foreign parents [...] are considered foreigners at birth and automatically become French when they reach eighteen, or earlier by request" (Simon, 2012, p. 5). This ius soli principle, along with the liberal stance towards dual nationality, means that France counts many dual nationals. France maintains a minimum age of eighteen years for spouses when it comes to family reunification, and requires sponsors to earn at least the revenu minimum d'insertion; minimum wage. Furthermore, in case of a large family, a higher wage is required, up to one and a half times the minimum wage. Income must be gathered by employment, as no gifts or other sources of income are allowed. Forasmuch political participation, France excludes foreigners from outside the EU from local suffrage. With regard to public services and enterprises, numerous jobs are restricted to just French or possibly EU nationals. Moreover, France does not provide for expulsion on grounds of manifest welfare dependence and has ratified ICERD in its criminal law. The Haute Autorité de Lutte Contre les Discriminations et Pour L'Égalité was established as an independent agency that can induce individual and collective investigations, and has the power to impose sanctions since 2006.

<sup>&</sup>lt;sup>57</sup> https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000508749

Cultural difference between immigrants and host nationals could be bridged by some cultural requirements for immigration. France just requires a sufficient level of language skills in this regard. France has never financed an Islamic school directly; likewise France does not offer any kind or optional Islamic education via its public schools (Berglund, 2015). Teachers have the duty to showcase the state's neutrality as they are considered to be French civil servants and thus are not allowed to wear headscarves. For female students holds the same since 2004, as all ostentatious religious symbols ought to be banned in public institutions. France does not broadcast either television or radio programs in any other language than French on public channels, which is laid down by law. Calls for prayer are not practiced in France. French Muslims complaints over the lack of prayer spaces and the sensitivity of visible religious practices result in controversial 'prayer in the streets' from time to time. Moreover, the absence of suitable prayer spaces re-triggers debates on whether new mosques must be built, their architectural design (e.g. minarets) and as a matter of course the funding of such spaces. French laws dictate that there is no need for special burial specificities. Issues like burial without coffin or special areas where the deceased face Mecca are not prescribed by law. Still, there are a few Muslim burial spaces, like in Bobigny, Aubervilliers, Drancy and La Courneuve. French politicians are frown upon separate Muslim burial spaces; it is therefore, besides family ties, why many French Muslims prefer to be buried in their family's country of origin. Ritual slaughter is allowed and halal-certified products are thriving in France among other due to the absence of unified standards on production and sale. Debates on halal food are quite centred on the availability of such products during *Eid al-Adha* festivities; as demands rise and local halal butchers fail to meet such peaks in demand. France allowed religious counselling by imams in prisons; however, it only became nationally coordinated and partially funded since 2005 with help from the CFCM. In the same fashion, officially state-paid imams work for the army. In sum, laïcite does not provide place for religion in public institutions.

#### The Netherlands and multiculturalism or group-based pluralism

The Netherlands has always been perceived as a tolerant state that embraces multiculturalism relatively well. The essence of multiculturalism is that foreigners are able to retain and live by their own culture, so that governments facilitate their need and host nationals accept those. Nevertheless, "[m]ulticulturalism in the Netherlands has been based on a distinct ethno-cultural categorisation [...] and is based on a more normative categorisation and distinction between societal groups" (Koomen et al., 2013, p. 203). This means that organisations oftentimes have to represent a certain ethnicity before partaking in several institutionalised platforms (e.g. the National Minorities Conference). Likewise, the Dutch government initiated a one single Muslim representative body: the Contactsorgaan Moslims en Overheid. Dutch Muslims prefer extra-parliamentary domains - such as petitions, demonstrations and mass media – over parliamentary politics (Cesari, 2014). An important difference between France and the Netherlands lies in the essence of group membership. The French approach is primarily concerned with the individual, whereas Dutch policies focus on group membership, explicated by its prior-installed pillarisation. Pillarisation, as one form of institutionalising pluralism, brought about relatively much autonomy for newcomers as well in the cultural as political spheres. Also, the Dutch church-state regime used to be characterised by pillarisation, as the institutionalisation of the segregated ideologies of Christian groups. Those different pillars were able to establish different social infrastructures, including trade unions, political parties, and health care providers that in turn received some government support. Even though the pillarisation fades away; "its institutional and legal features have to an important extent survived, and have become an important point of reference for debates about religious rights for Muslims" (Carol & Koopmans, 2013, p. 171). The Dutch churchstate relation is by no means as rigid as the French laïcite. In the Netherlands, religious organisations are allowed and get involved with politics, especially concerning abortion and euthanasia laws. The state on the other hand, has the constitutional obligation to stay neutral as to treat everyone equally and freedom of religion. This means that interferences with religious doctrines and the internal organisation of religious institutions is forbidden (Cesari, 2014).

The Netherlands has a relatively open citizenship regime that looks for integration and the possibility of retention of migrants' own culture at the same time. Naturalisation waiting time is five

years and welfare dependence is no hindrance for naturalisation<sup>58</sup>. The Netherlands have introduced tests for language skills and civic knowledge as requirements for naturalisation which are only required for 'non-Westerners' (Ibid.). The Netherlands have a double ius soli policy, meaning that third generation migrants automatically receive the Dutch citizenship status, while "second generation migrants can claim Dutch citizenship by unilateral and unconditional declaration at majority" (Carol & Koopmans, 2013, p. 170). A minimum age of twenty-one is required for family reunification and formation, however, while for the former a full minimum wage is required as income, the sponsor must earn at least twenty per cent more than the standard social security benefits. With regard to expulsion, the rule holds: the longer the immigrant resides in the Netherlands, the more protection it enjoys. This implies that - dependent on the judicial verdict - any immigrant can be expelled, although actual expulsion is partly decided through its time of residence. Moreover, immigrants cannot be terminated because of their dependence on public welfare benefits. The Dutch state grants Dutch foreigners relatively very extensive suffrage rights, as they can vote both; passively and actively. Another criterion that points to a Dutch liberal stance is the allowance of non-nationals in public services since 1983; still, there are some exceptions in play for extremely high ranking posts oftentimes related to national security and representative functions. The Dutch law Algemene Wet Gelijke Behandeling encompasses extensive provisions against discrimination in all forms, including ethic and religious.

Concerning cultural differences, the Netherlands seem to have other priorities than France. For instance, in order to naturalise, immigrants must pass a language and civic knowledge test that characterises the Dutch ideal of mutual interactionism (Liu, 2017). As Christian schools receive public funding, Islamic schools do so too since 1988. With the right for religious freedom in mind and so the symbolic expression thereof, teachers and students are allowed to wear headscarves. About television and radio broadcasts, the Netherlands can be considered as the frontrunner, providing for programs directed to minorities in their native languages since 1980. The Dutch Program Foundation (NTR) is even required to spend twenty and twenty-five per cent of time respectively to television and radio for minority groups. There is no national regulation dealing with the specific concern of call to prayer, however, call to prayer is all but common across the country. Those prayer houses that call for prayer do so once per week right before the main prayer (Jumu'ah) on Friday. There is no shortage of prayer spaces. The Netherlands also shows tolerance with regard to the deceased. "The possibilities include different religious cemeteries, separate religious plots in municipal public cemeteries, and also public municipal parts in religious cemeteries" (Outmany, 2016, p. 89). Ritual slaughter is permitted too, even though fierce parliamentary debates between 2008 and 2011 eventually resulted in a proposal prohibiting ritual slaughter, which was disapproved by the senate later on. The Dutch government allowed imams in prisons and military on an ad hoc basis in 1988, and regularised it since 2007. For consulting Muslim minorities on political processes, Councils were already established in the 1980s. In 1985, the Landelijke Advies- en Overlegstructuur Minderhedenbeleid was created and replaced by the Landelijk Overleg Minderheden in 1998, providing a legal basis for consulting minorities through the Councils. Overall, one could state that "because Christian and Protestant 'pillars' had state-sponsored semiautonomous education, health and welfare institutions, it was difficult to deny such rights to newer cultural and religious minorities" (Koopmans, 2005, p. 158) as of which Muslims are the most prominent example. Even though, the pillar system has faded away, its institutional and legal structures live on and function as an opportunity window for Muslim in debates on religious rights and infrastructure (Statham, 2016).

### The United Kingdom' 'race-centred' cultural pluralism

England has an official state religion, namely the Anglican Church that glory in a privileged position. This also brings haziness as to whether the United Kingdom can be considered as a secular state per se, as Northern Ireland, Scotland and Wales do not have an official state religion. The presence of bishops in the House of Lords and their partaking in debates affects the entire United Kingdom and thus blurs the separation of state and church.

<sup>&</sup>lt;sup>58</sup> <u>https://ind.nl/Nederlanderschap/Paginas/Naturalisatie.aspx</u>

The categorisation of immigrants in Britain has undergone some changes, shifting from 'colour' and 'race' to ultimately also 'religion' as category, not least due to the increasing flux of Muslims (Joly, 2012). When the Rushdie affair mobilised Muslims to unite – irrespective of intrareligious, ethnic or linguistic differences – a common religious identity came to the fore for the first time. This Rushdie affair signifies the starting point as to the negotiating of religious accommodation of religious practices, including education, marriage and burial and chaplaincy. However, series of riots and the London bombings in 2005 changed the discourse from religious accommodation to anti-discrimination measures. Over the last few decades, several regulations forasmuch citizenship rights and cultural difference have changes.

An applicant must have a minimum age of eighteen and have lived in the United Kingdom for at least five years before the date of application<sup>59</sup>. There is no need to consider welfare dependency as an obstacle for an applicant. The United Kingdom has both, an English language test and the 'Life in the UK Test' on civic knowledge, which must be passed before naturalisation. Second generation, say children to foreign parents born in the United Kingdom automatically acquire the British nationality by means of *ius soli*, as long as both parents have fulfilled all their residence requirements themselves. This also means that the United Kingdom posits a liberal stance towards dual citizenship. The British government raised the age limit for spouses to twenty-one in November 2008. However, there are no additional requirements as to waiting periods or permanent residence permits before family moves over. Some countries terminate the residence of foreign nationals form their territory when dependence on public welfare benefits cannot be precluded. The United Kingdom does not have very clear legislation on this issue of economic self-sufficiency provisions, which inter alia means that relevant authorities on this matter enjoy high levels of discretion. The opportunity of employment for foreign nationals in the public sector are rather liberal in the United Kingdom, as there is no nationality requirement for positions in the public sector, and thus employers are not allowed to discriminate based on nationality. However, when it comes to civil service posts, several functions are solely to be fulfilled by British nationals. The United Kingdom is an early example of introducing anti-discrimination provisions in its civil law system, especially when it comes to discrimination in employment-related fields. It is therefore not surprisingly that the United Kingdom ratified the ICERD as part of its criminal law. Overall, the United Kingdom is very progressive when it comes to antidiscrimination stipulations via Race Relations policies and its revisions over time. Also, the British were the first to establish an independent body that fights discrimination within public and private spheres. The British Commission for Equality and Human Rights' predecessor was already established by the Race Relations Act in 1976, and is mandated to investigate and take legal action independently from the government (O Cinneide, 2007). The Commission – CEHR – gained more and more powers over the years, as it now is allowed to enter and enforce legal action, that is, it may sign binding agreements with employers and trade unions. Overall, we see a state-sponsored 'race relations' industry (Statham et al., 2005) in which especially anti-discrimination legislation plays a pivotal role. The emphasis of anti-discrimination however, is placed on ethnicity as religion remains a private matter while at the same time its own Church of England retains it privileges.

For cultural differences, the United Kingdom sharpened some regulations concerning the cultural requirements for residence and naturalisation. For the actual cultural dimensions – say religious accommodation – however, the United Kingdom liberalised to some extent over the last three decades. Like the other three countries, the United Kingdom is more willing to co-finance separate Islamic schools than to allow for Islamic religious classes during regular schools hours. The first Islamic schools opened in 1979, while the "Islamia Primary School in London becoming the first Muslim school to receive state funding in 1997" (AMS, n.d., p. 6). Headscarves are of no issue in the United Kingdom as both, teachers and students are allowed to wear them in public schools. For a long time, the United Kingdom did provide for television and radio broadcasts in which multiculturalism used to be at the heart. However, there was no law regulating air times, now there is a law that states that multiculturalism does not necessarily have to be reflected within media, radio and television channels. Nevertheless, just like in the Netherlands there are Islamic programs on public radio and television, produced and provided by Muslim communities. The call for prayer – *Adhan* – is not very common in the United Kingdom. In comparison to the other three countries, the United Kingdom has

<sup>&</sup>lt;sup>59</sup> https://www.gov.uk/becoming-a-british-citizen/check-if-you-can-apply

by far the largest number of mosques. Moreover, the 'Islamisation of space' is to be observed not just in urban areas, as also airports, hospitals, shopping malls, prisons and gas stations provide for prayer spaces (Cesari, 2014). The United Kingdom does provide for separate Islamic cemeteries and ritual slaughter without pre-stunning is allowed, with some criteria in play forasmuch abattoirs, butchers' certificates and the intended consumption for religious groups. Since 2002, Imams have been installed in prisons and more recently the same applies for the military. Even though the Muslim Council of Britain (MCB) has not been formally established by the government, it represents Muslims in the United Kingdom (McLoughlin & Cesari, 2016). The MCB is widely seen and accepted as the interlocutor between Muslims and the government, and thus negotiating partner (Adamson, 2011). This again highlights Britain's focus on race relations instead of religion and essentially preventing conflicts (Statham, 2016).

### Germany's differentialism

Germany, due to its federal nature, provides a totally different context as Länder determine the relation between state and religion as they decide on arrangements on the federal-state level, while the actualisation, say accommodation, happens on the municipal level. However, this does not mean that the federal government has no role at all, as it established the German Islam Conference. This platform brings together Muslim and state representative from all levels<sup>60</sup>. The federal government's role comes to the fore when a paradigm shift takes places, that is, when Islam and national interests – say security and public order – seem to get intertwined.

Just like in the United Kingdom, immigrant communities were primarily distinguished based on linguistic or ethnic lines, instead of religious ones. However, as the well-known 'myth of return' seemed to hold for Germany too. Muslim communities started to organise themselves. "Islamic religious life and political representation in Germany is organised according to the German civil law" (Cesari, 2014, p. 124). Muslim representation is coordinated by the Koordinationsrat der Muslime in Deutschland - the KRM - which was founded by DITIB, VIKZ, Islamrat, and Zentralrat der Muslime. The nation-wide web of Islamic umbrella organisations is very extensive and diverse, as differences exist along ethnic lines, gender, explicit Islamic student associations and most importantly as to recognition (Kreienbrink, Bodenstein, & für Migration, 2010). It is exactly this web that complicates matters for organisations, as the institutionalisation of Islam is accompanied with numerous differences in resources, history, dependence, size and recognition (Rosenow-Williams, 2012). As to church-state regimes, Muckel and Tillmanns (2008) argue that Germany is shaped by Christian installation which is translated into legislation, while Germany labels itself as secular state and thus must not either privilege or discriminate against religion (Muckel & Tillmanns, 2008). Paul Statham (2016), however sees that church-state relation in Germany privileges Christianity over any other religion (Statham, 2016). Another important aspect is Germany's public policy towards the public functions of religious communities, which could acquire the status of 'corporations of public law'. This status brings about several benefits as to construction, consultation, education and taxation (Ireland, 2004; Soper & Fetzer, 2007). The status of a Körperschaft des öffentlichen Rechts has been granted to several Christian and Jewish denominations (Kreienbrink et al., 2010). However, Muslim organisation experience difficulties in acquiring this status, primarily due to the regional character of such organisations. "Germany [...] is often typified as being rather exclusive in the area of integration" (Koomen et al., 2013, p. 204), which can be analysed through citizenship rights and regulations on cultural differences.

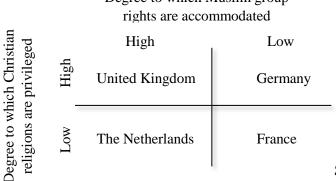
Germany maintains a naturalisation waiting time of eight years, while the applicant must pass a civic knowledge and language test<sup>61</sup>. Germany only replaced its *ius sanguinis* principle by allowing *ius soli* attribution of nationality in 2000. Of all four countries, Germany has the lowest naturalisation rates. Germany transposed the European Directive on Family Reunification into domestic legislation, meaning that the absence of an age limit for spouses turned into the minimum age of eighteen years for both individuals. When it comes to family reunification, Germany is rather restrictive, which also might explain its relatively low naturalisation rates. A minimum income is required without

 <sup>&</sup>lt;sup>60</sup> <u>http://www.bmi.bund.de/EN/Topics/Society-Constitution/German-Islam-Conference/german-islam-conference\_node.html</u>
 <sup>61</sup> <u>http://www.bamf.de/EN/Willkommen/Einbuergerung/InDeutschland/indeutschland-node.html</u>

dependence on public welfare benefits, while at the same time all family members must be covered by health insurance. It is only allowed for EU national to partake in local suffrage, and thus third nationals are excluded. Moreover, Germany excluded its expulsion rules with regard to welfare dependence as motivation for the expulsion for long-term residents. With regard to anti-discrimination laws, Germany lags somewhat behind as there is no article that particularly penalises discrimination explicitly based on ethnicity or race in the German Penal law. The establishment of the federal Antidiskriminierungsstelle assists victims by advising and informing about legal procedures, however is not authorised to investigate cases, decide on complaints or take legal action independently.

Those rather restrictive indications can also be observed within the regulations concerning cultural differences. First of all, naturalisation applicants must pass not just a language test, but also their knowledge about the German legal, social systems and 'way of living' is examined. As to the headscarves, the sixteen different Länder decide upon laws and policies, not the federal government. Therefore, sixteen different approaches toward the headscarf – for teachers and pupils – can be found in Germany. Television and radio broadcasts in immigrant language have been common in Germany since the 1960s. The main programs were under control of Germany's regional public service broadcasters, while since the German reunification different formats have phased in and out. The call for prayer becomes more and more common in Germany, especially in the Ruhr area but remains region-specific. Many German Muslims decide to get buried in their country of ethnic origin (M. S. Moore, 2007), however recently talks on Islamic cemeteries have started. Germany used to prohibit ritual slaughter by the argument of Animal Protection Law. However, this position was altered when the constitutional court decided in 2002 that basic law provides for religious freedom, which selfevidently also applies to butchers and consumers of meat. As to Islamic counselling in prisons and the army, Germany allows volunteering imams on an ad hoc basis. Unlike France, the Netherlands and the United Kingdom, Germany has no formal fund for this.

Figure 1.3: Cross-national variation along two dimensions



Degree to which Muslim group

Source: (Statham, 2016, p. 221)

Table	1.1:	FRA	NL	UK	GER	
		Implementation of basic provisions of the ICERD in national criminal law: racial hatred	1	1	1	1
y al	-	Inclusion of discrimination next to explicit racism in such laws	1	1	1	-1
idu.	1	Existence of specific anti-discrimination legislation in civil law	0.5	1	0.5	0.5
Individual equality		Existence and powers <sup>63</sup> of state sponsored anti-discrimination agencies	1	0.5	1	-0.5
e		Restrictions on voting rights of naturalised citizens	1	1	1	1
		Voting rights for foreign residents (local and national)	-1	0.5	1	-1
	2	Immigrant consultative bodies on the national level	-0.5	1	-0.5	-0.5
		Immigrant consultative bodies on the local level	0	0.5	-0.5	0.5
		Religious minority consultative bodies	0.5	1	0.5	-0.5
		Number of state-funded Islamic elementary and secondary schools <sup>64</sup>	-0.5	1	0	Х
	3	Share of costs of Islamic elementary and secondary schools that is covered by the state	X	1	0.5	-0.5
		Islamic/other religious minority religious classes in state schools	-1	0	0	0
e		Right of Muslim female teachers to wear religious symbols in public schools	-1	1	1	0
ene		Right of Muslim students to wear religious symbols in public schools	-1	1	1	1
ffeı		Mother tongue teaching in public schools	0	-1	-0.5	0
di		Cultural requirements for the granting of residence permits <sup>65</sup>	-1	-1	-1	-1
ıral		Allowance of ritual slaughtering of animals according to the Islamic rite	1	1	1	0
Cultural difference		Allowance of the Islamic/Christian call to prayer in public	-1	1	0	0
Ū		Number of mosques with recognisable architecture <sup>66</sup>	0	1	1	1
	7	Existence of Muslim cemeteries and separate sections of cemeteries	1	0	1	0
	7	Allowance of burial according to the Islamic rite (i.e., without coffin)	-1	1	0	0
		Programs in immigrant languages in public broadcasting (radio and television)	-1	0	0	1
		Islamic religious programs in public broadcasting (radio and television)	-1	1	-1	-1
		Muslim chaplains in prisons	1	1	0	-1
		Muslim chaplains in the military	1	1	1	0

\*1: Anti-discrimination; 2: Political rights; 3: Educational rights; 4: Other cultural and religious rights

<sup>&</sup>lt;sup>62</sup> Some institutional arrangements are formally allowed but practicalities might hinder the religious practice (e.g. Aid el-Kebir festival and inadequate capacity to meet halal demands in France, or the absence of an "Islamic religious rule [that] explicitly forbids the consumption of meat from animals stunned before slaughter" meant that several courts did not grant exemptions) (Cesari, 2014, p. 639). Or the institutional allowance of chaplaincy in prisons or army, but difficulties with selecting chaplains
 <sup>63</sup> capacity to take individual legal action, investigative powers, decision-making on complaints
 <sup>64</sup> per 100,000 of the respective minority
 <sup>65</sup> E.g., language skills, other knowledge of the host society
 <sup>66</sup> E.g., with minaret; per 100,000 Muslims

			666	2000	01	2002	2003	2004	2005	2006	2007	2008	Total
	Appendix 2: Claims on Islamic religious practices over t	ime	19	20	2001	20	20	20	20	20	20	20	$T_{0}$
	Allowance of Islamic ritual slaughtering	-1	0	0	0	2	0	0	0	0	0	1	3
		0	1	0	1	2	1	1	0	1	0	0	7
		+1	1	0	1	0	1	1	1	0	0	0	5
	Provision for burial according to the Islamic rite	0	0	0	0	0	0	0	0	0	1	0	1
ole		+1	0	0	0	0	0	1	1	1	1	2	6
Non-visible	State recognition of Islamic religious organisations	-1	1	0	0	0	0	0	0	0	1	0	2
-vi		0	1	0	0	1	2	0	1	1	0	0	6
on		+1	2	2	3	4	3	1	1	3	1	1	21
Z	Islamic religious classes in state schools	-1	3	3	1	0	0	4	1	1	0	3	16
		0	0	1	0	0	0	0	0	1	0	1	3
		+1	7	2	1	1	1	2	2	2	0	7	25
	Imams in army and prisons	0	0	0	0	0	0	0	0	0	1	0	1
		+1	0	0	0	0	0	0	3	0	0	0	3
	Allowance of Islamic call to prayer	-1	0	0	0	1	0	0	0	1	0	1	3
	Anowance of Islamic can to prayer	0	0	0	0	1	0	0	1	0	0	0	2
		+1	0	0	0	0	0	0	0	0	1	0	1
	Right to build minarets	-1	0	0	0	0	0	2	0	1	1	0	4
	Right to build minarets	0	0	0	0	0	0	0	0	0	1	0	1
		+1	0	0	0	0	0	0	0	1	1	0	2
	Right to build (visible) mosques	-1	0	0	0	8	2	4	2	6	5	4	31
	Right to build (visible) mosques	0	0	1	3	1	2	9	0	1	5	2	24
		+1	1	1	4	1	5	6	4	16	5	18	61
	Rights regarding the establishment and running of Islamic	-1	0	1	0	4	1	3	2	2	1	0	14
	schools	0	0	2	3	4	2	0	4	2	2	1	20
	5010013	+1	0	2	0	3	4	2	4	3	1	3	22
le	Islamic religious programs in public broadcasting	-1	0	0	0	0	0	0	0	0	1	0	1
ib	istanie rengious programs in public broadcusting	0	0	0	1	0	0	0	0	0	0	0	1
Visible		+1	1	0	0	0	0	1	0	1	0	0	3
ŕ	Right related to wear headscarf hair-covering headgear for	-1	1	0	2	0	10	5	0	1	0	1	20
	female students	0	1	0	0	0	6	11	2	3	0	0	23
		+1	1	0	0	0	7	13	0	0	0	1	22
	Right related to wear headscarf hair-covering headgear for	-1	0	1	0	0	8	7	1	1	1	1	20
	teachers	0	0	0	0	0	2	0	1	0	0	0	3
		+1	0	2	0	0	7	4	2	3	3	0	21
	Right related to wear burga or niquab hair and face-covering	-1	0	0	0	0	1	0	1	7	0	0	9
	headgear for female students	0	0	0	0	0	0	5	0	0	4	0	9
		+1	0	0	0	0	1	3	1	1	0	0	6
	Right related to wear burga or niquab hair and face-covering	-1	0	0	0	0	0	1	0	0	0	0	1
	headgear for teachers	0	0	0	0	0	0	0	0	8	0	0	8
		+1	0	0	0	0	0	0	0	2	0	0	2

0,8 * 0,6 0,4 0,2 0 0 0 -0,2 -0,4 -0,4		~								2
-0,6	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
Overall	0,38	0,22	0,3	-0,18	0,11	0,09	0,34	0,19	0,08	0,45
Non-visible	0,44	0,13	0,57	0,3	0,625	0,1	0,7	0,5	0,2	0,4
	0,4	0,3	0,15	-0,39	0,03	0,07	0,2	0,13	0,06	0,47

## Average position of claims on Islamic religious practices over time

Appendix 3:	Identifications f	for coding the	six discursive	e elements
FF · · · ·				

- D'	Appendix 5: identifications for couning the six dise	
	ursive element: WHO	
	able label: ACTOR	Identification
10	'governments'	10. government representatives (all levels UN, EU, national)
20	'legislatives'	20. legislatives, parliaments (all chambers) and members thereof
30	'judiciary'	30. courts of justice, prosecutors, judges and juries
40	'police and security agencies'	40. polices, military, marechaussee, secret services, Interpol, NATO
50	'state executive agencies specifically dealing with migrants'	50. all levels (national immigration services, UNHCR)
60	'other state executive agencies'	60. social organisations or services (ILO, WHO, national variants)
70	'political parties'	70. with an explicit reference to the political party only
80	'unions'	80. unions that do not fall under other categories (e.g., police, judges)
90	'workers and employees'	
100	'employers organisations and firms'	
110	'churches'	110. 'native' churches only
120	'Christians'	
130	'media and journalists'	
140	'professional organisations and groups'	140. profession-based organisations or associations (e.g.,
141	'researchers/think tanks/intellectuals'	psychologists or doctors)
150	'Muslim organisations and groups'	1 · <b>J</b> · · · · <b>J</b>
151	'Muslim: profession-based'	
152	'Muslim: religion-based groups'	
153	'Muslim: other organisations and groups'	
160	'other minority organisations and groups'	
161	'other minorities: profession-based'	161. associations of academics, writers, entrepreneurs
162	'other minorities: religion-based groups'	162. religious groups of any kind (including Christian denominations)
162	'other minorities: other organisations and groups'	102. Tenglous groups of any kind (meruding emistian denominations)
170	'antiracist organisations and groups'	170. organisations and foundations with the principal objective to
171	'antiracist: profession-based'	fight racism, discrimination
171	'antiracist: church-based'	nght facisin, disermination
172	'antiracist: other'	
180	'pro-minority rights and welfare organisations and groups'	180. (semi-) private organisations acting on behalf of migrants and
181	'pro-minority: profession-based'	minorities
182	'pro-minority: church-based'	182. welfare organisations and groups related to churches only
182	'pro-minority: other'	182. Wenare organisations and groups related to endrenes only
190	'general solidarity, human rights and welfare organisations'	190. private organisations (e.g., Red Cross, Amnesty International)
190	'general solidarity: profession-based'	190. private organisations (e.g., Red Cross, Annesty International) 191. e.g., Medecins sans frontieres
191		0
192	'general solidarity: church-based' 'general solidarity: other'	192. e.g., Arbeitskreis Solidarische Kirche
200	'racist and extreme right organisations and groups'	200. organisations and groups known as 'right-wing extremists'
200	'extreme right political parties'	200. organisations and groups known as fight-wing extremists 201. extreme right parties participating in the electoral process (e.g.,
201 202	'other racist and extreme right organisations and groups'	Front National, BNP, Deutsche Liga)
		210. left-wing groups that do not participate in the electoral process
210	'radical left organisations and groups'	210. Ient-wing groups that do not participate in the electoral process
220	'other civil society organisations and groups'	
221	'other civil society: students'	222 social managements of passa and incremental memory right
222	'other civil society: new social movements'	222. social movements of peace, environmental, women rights
223	'other civil society: vertriebene/repatries/expats'	
224	'other civil society: neighbourhood associations'	
225	'other civil society: citizens' initiatives'	
229	'other civil society: other'	
999	'unknown actors'	999. vague notions as 'youth', 'local citizens' but unorganised

Discu	ursive element: HOW	
Variable label: FORM		Identification
10	'repressive measures'	10. repressive action (e.g., bans, rulings, arrests or violence by police)
20	'political decision'	20. only decisions of organisations and institutions with significant
30	'press conference'	decision-making power (e.g., passing of legislation, decrees and
31	'newspaper interview'	resolutions)
32	'TV interview'	
33	'radio interview'	
34	'opinion article/open letter'	

-		
35	'editorial'	
36	'report, book, etc.'	
37	'public speech'	
38	'statement in parliament/government, organisational meetings'	
39	'other press statements/declarations'	
40	'meetings'	40. e.g., conferences, congresses that take place inside
50	'judicial action'	50. appeals to, but no action by the judiciary (e.g., filing lawsuits), no
60	'direct-democratic action'	actions by the judiciary (= 'repressive measure')
70	'petitioning'	70. petitions and letter campaigns not related to referendum
80	'demonstrative protests'	80. e.g., demonstrations, manifestations and marches
90	'confrontational protests'	90. e.g., occupations, blockades, strikes, graffiti and other forms of
100	'violent protests'	civil disobedience

Discu	Irsive element: AT WHOM	
Varia	ble label: ADRES (same categorisations as ACTOR variable)	Identification
10	'governments'	10. government representatives (all levels UN, EU, national)
20	'legislatives'	20. legislatives, parliaments (all chambers) and members thereof
30	'judiciary'	30. courts of justice, prosecutors, judges and juries
40	'police and security agencies'	40. polices, military, marechaussee, secret services, Interpol, NATO
50	'state executive agencies specifically dealing with migrants'	50. all levels (national immigration services, UNHCR)
60	'other state executive agencies'	60. social organisations or services (ILO, WHO, national variants)
70	'political parties'	70. with an explicit reference to the political party only
80	'unions'	
90 100	'workers and employees'	
100	'employers organisations and firms'	
110	'churches'	110. 'native' churches only
120	'Christians'	
130	'media and journalists'	
140	'professional organisations and groups'	140. profession-based organisations or associations (e.g.,
141	'researchers/think tanks/intellectuals'	psychologists or doctors)
150	'Muslim organisations and groups'	
151	'Muslim: profession-based'	
152	'Muslim: religion-based groups'	
153	'Muslim: other organisations and groups'	
160	'other minority organisations and groups'	161 and intime of an lamine without entername
161	'other minorities: profession-based'	161. associations of academics, writers, entrepreneurs
162	'other minorities: religion-based groups' 'other minorities: other organisations and groups'	162. religious groups of any kind (including Christian denominations)
163 170	0 0 1	170 preprint and foundations with the principal chievities to
170	'antiracist organisations and groups'	170. organisations and foundations with the principal objective to fight racism, discrimination
171	'antiracist: profession-based' 'antiracist: church-based'	nght facishi, discrimination
172	'antiracist: other'	
173	'pro-minority rights and welfare organisations and groups'	180. (semi-) private organisations acting on behalf of migrants and
180	'pro-minority: profession-based'	minorities
182	'pro-minority: church-based'	182. welfare organisations and groups related to churches only
182	'pro-minority: other'	182. Wenale organisations and groups related to endrenes only
190	'general solidarity, human rights and welfare organisations'	190. private organisations only (e.g., Red Cross, Amnesty
191	'general solidarity: profession-based'	International)
192	'general solidarity: church-based'	incritational)
193	'general solidarity: other'	
200	'racist and extreme right organisations and groups'	200. organisations and groups known as 'right-wing extremists'
201	'extreme right political parties'	201. extreme right parties participating in the electoral process (e.g.,
202	'other racist and extreme right organisations and groups'	Front National, BNP, Deutsche Liga)
210	'radical left organisations and groups'	210. left-wing groups that do not participate in the electoral process
220	'other civil society organisations and groups'	
221	'other civil society: students'	
222	'other civil society: new social movements'	222. social movements of peace, environmental, women rights
223	'other civil society: vertriebene/repatries/expats'	
224	'other civil society: neighbourhood associations'	
225	'other civil 'society: citizens' initiatives'	
· · · · · · · · · · · · · · · · · · ·	·	

229	'other civil society: other'	
999	'unknown actors'	999. vague notions as 'youth', 'local citizens' but unorganised
Diam	mains alamanti WILLAT	
	Irsive element: WHAT ble label: ISSUE	Identification
	IMMIGRATION, ASYLUM, AND ALIENS POLITICS	
1 100	'general evaluation or policy direction'	100 overell/general essegment/statement of status que or discourse
100	'institutional framework, responsibilities, procedures, costs'	100. overall/general assessment/statement of status quo or discourse 101. e.g., "limit the costs and time of asylum procedures"
101	'migration prevention in homeland countries'	101. e.g., "combat the causes of migration"
102	'entry and border controls'	102. e.g., "combat the causes of higherion" 103. e.g., "stop the influx of Aussiedler"
103	'registration and internal control'	104. police competences and central registration of aliens
104	'recognition, residence rights, legal status and permits'	105. e.g., "soften the criteria to obtain residence permits for []"
105	'access to welfare services and the labour market'	106. e.g., "limit social welfare payments to asylum seekers"
100	'expulsions/deportations'	107. e.g., "deportation treaty between [country] and [country]"
108	'voluntary return'	108. e.g. trigger foreigners to return to country of origin
109	'other specific issues'	······································
2	MINORITY INTEGRATION POLITICS	
200	'general evaluation or policy direction'	200. e.g., "strive for the integration of foreigners"
201	'institutional framework, responsibilities, procedures, costs'	201. e.g., "more resources for agencies dealing with foreigners"
211	'naturalization and citizenship'	211. conditions for naturalisation and dual nationality
212	'political rights and participation'	212. local voting rights for foreigners, rights to demonstrate
213	'social rights and participation: labour market'	213. quotas on economic migration and economic consequences
214	'social rights and participation: education'	214. opportunities in education, special provisions
215	'social rights and participation: health and welfare'	
216	'social rights and participation: language acquisition'	
217	'social rights and participation: housing and segregation'	217. ghettoization
218	'social rights and participation: police and judiciary'	218. minorities' representation/quota in police
219	'social rights and participation: other/general'	
220	'cultural rights and participation: education'	220. considerations as language teachings (e.g., Arabic, Turkish)
221	'cultural rights and participation: religion'	221. rights related to Islamic religious practices
222	'cultural rights and participation: group identity'	222. e.g., "recognize Kurds as a group separate from the Turks"
223	'cultural rights and participation: other/general'	
224	'other rights and participation'	
232	'discrimination in politics'	
233 234	'discrimination in the labour market' 'discrimination in the education system'	
234	'discrimination in health and welfare services'	235. e.g., "abolish special enquiries when foreigners apply for social
235	'discrimination regarding housing'	welfare"
230	'discrimination in the police and judiciary system'	237. e.g., "abolish registration of foreigners in a special police
237	'discrimination: other specific issues'	register"
252	'crime'	252. e.g., "tougher line with criminal foreigners"
252	'political extremism and violence'	253. e.g., "tougher measures against foreign extremists"
253	'Islamic extremism and violence'	
255	'Position of women in Islam'	
256	'Position of women in other minority groups'	
257	'Anti-Semitism'	
258	'Homosexuality'	
259	'other'	
261	'inter/intraethnic relations'	261. conflict between different ethnic minorities
262	'inter/intraorganisational relations'	
3	ANTI-RACISM/ISLAMOPHOBIA	
301	'racism/islamophobia and extreme right language in politics'	301. e.g., "fight the use of racist language by politicians"
302	'police racism/Islamophobia and violence against minorities'	302. e.g., ethnic profiling
303	'racism/Islamophobia in other state institutions'	303. e.g., "combat extreme right tendencies in the Bundeswehr"
304	'racism/Islamophobia in non-state institutions'	
305	'stigmatisation of minorities/Muslims/Islam in public debate'	211 annuals for distance source to available the last
311	'moral appeals'	311. appeals for dialogue, empathy, respect, solidarity and tolerance
312 313	'social and educational responses' 'countermobilisation'	212 e.g. "aitizens should protect cardium coolier contern"
313 314	'protection of minorities against violence'	<ul><li>313. e.g., "citizens should protect asylum seeker centers"</li><li>314. e.g., "police should protect asylum seeker centers better"</li></ul>
514	protection of minorates against violence	ידי כ.צ., איז איז איז איז איז איז איז איז איז איז

315	'extreme right parties: alliances and exclusion'	315. e.g., "no cooperation with extreme right parties"
316	'repression: political responses'	316. e.g., "ban extreme right organisation" / "ban extreme right
317	'repression: judicial responses'	marches"
318	'repression: police responses'	318. e.g., "police do not sufficiently interfere when xenophobic acts
319	'repression: other'	are committed"
320	'other specific issues'	
4	ISLAMOPHOBIC CLAIMS	
400	'general Islamophobic claims'	
401	"against Islamification"	
402	"other anti-Islam/Muslim claims"	
5	ACTOR CLAIMS MUSLIMS	5. only if ACTOR is explicitly Muslim in Western Europe
500	'pure homeland politics'	500. e.g., "stop repression of Kurds in Turkey"
501	'politics of country of residence regarding homeland issues'	501. e.g., "lift ban on the PKK in Germany" / "admit Turkey to the
511	'Palestine-Israeli conflict'	EU"
512	'Iraq war'	
513	'Afghanistan war'	
514	'other Islamic solidarity'	
515	'other transnational politics'	
516	'World War II/Holocaust'	
521	'other'	

-		
Discu	ursive element: TO WHOM	
Varia	able label: OBJECT	Identification
0	'no Muslim OBJECT frame'	"Only Muslim objects are coded here. OBJECT is an auxiliary
101	'all Muslims in general'	variable that is used to qualify the codes given in ATTRISL. If a
102	'majority/most Muslims'	claimant refers to two different frames:
103	'minority/small group/particular categorical group of Muslims'	
104	'individual Muslims'	e.g., "A minority of Muslims is violent, but they misunderstand Islam,
105	'unclassifiable Muslims'	which is a peaceful religion"
201	'Islam in general'	
202	'Islam mainstream'	Only the frame referring to the alleged majority tendency among
203	'minority currents within Islam'	Muslims / in Islam should be coded. (i.e., in the given example,
204	'specific religious stream/movement within Islam'	ATTRISL is coded 114 'peaceful'; OBJECT = 101 "Islam in general"
205	'unclassifiable Islam'	

	ursive element: WHY (do not read)	
Varia	able label: ATTRISL	
0	'no ATTRISL frame'	
101	'democratic'	
102	'tolerant'	
103	'liberal'	
104	'violent'	
105	'terrorist'	
106	'fanatic'	
107	'backward'	
108	'patriarchal'	
109	'oppressive'	
110	'proselytising'	
111	'incompatible with separation of religion and state'	
112	'flexible/varied'	
113	'philanthropically'	
114	'peaceful'	
115	'civilised'	
116	'radical/extreme'	
117	'fundamentalist'	
118	'conservative'	
119	'moderate'	
120	'progressive'	
121	'orthodox'	

Posit	ion of claim						
Varia	Variable label: POSIT						
-1	'anti-Muslims/Islam/xenophobic/extreme right'	e.g., "stricter measures against minority crime"					
0	'neutral/ambivalent'	e.g., "strive for a European solution to immigration problems"					
+1	'pro-Muslims/Islam/antiracist/anti-extreme right'	e.g., "do not criminalise foreigners"					
9	'unclassifiable'						

Priority rules

WHO – Claimant identification might be problematic when the actor could fall into several groups. When this happens, "the following priority rules apply: 1.) minority group identification; 2.) extreme right and racist group; 3.) antiracist and pro-minority group; 4.) general solidarity, human rights and welfare groups; 5.) all other groups" (M. Giugni, 2012, p. 11).

HOW – Verbs indicating action (e.g., said, stated, demanded, criticised, decided, demonstrated, published, voted, wrote, arrested) must be considered as political. State of minds, speculations and opinions are excluded because they do not refer to action or incite for a certain political direction. Here again, some decision rules for classification are needed when an article contains multiple forms: "protest > political decision > verbal statement (in newspaper, TV, radio, public etc.) > repressive measure" (M. Giugni, 2012, p. 31).

AT WHOM – "[T]he actor at whom a demand is explicitly addressed" (M. Giugni, 2012, p. 33) that is usually a state actor pointing to the institutional determinants as points of reference. There are two other types of addressees, namely criticised and supported actors. When a claim contains more than one addressee, the following priority rules are maintained: "(1.) organizations or institutions (or their representatives) have priority over unorganised collectivities or groups; (2.) state actors have priority over non-state actors" (M. Giugni, 2012, p. 33).

Appendix 4: Marascuilo procedure ( $\chi^2(0,05; 3) = 7,81$  test-statistic)

4a: Marascuilo procedure: Muslim organisations and groups.

$$P^{FR} - P^{NL} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,296\left(1-0,296\right)}{750} + \frac{0,162\left(1-0,162\right)}{890}\right)} = 0,058$$

$$P^{FR} - P^{UK} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,296\left(1-0,296\right)}{750} + \frac{0,323\left(1-0,323\right)}{1171}\right)} = 0,060$$

$$P^{FR} - P^{GER} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,296\left(1-0,296\right)}{750} + \frac{0,159\left(1-0,159\right)}{784}\right)} = 0,059$$

$$P^{NL} - P^{UK} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,162\left(1-0,162\right)}{890} + \frac{0,323\left(1-0,323\right)}{1171}\right)} = 0,051$$

$$P^{NL} - P^{GER} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,162\left(1-0,162\right)}{890} + \frac{0,159\left(1-0,159\right)}{784}\right)} = 0,050$$

$$P^{UK} - P^{GER} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,323\left(1-0,323\right)}{1171} + \frac{0,159\left(1-0,159\right)}{784}\right)} = 0,053$$

4b: Marascuilo procedure: Repressive measures.

$$P^{FR} - P^{NL} = \sqrt{7,81} \sqrt{\left(\frac{0,427(1-0,427)}{75} + \frac{0,600(1-0,600)}{85}\right)} = 0,218$$

$$P^{FR} - P^{UK} = \sqrt{7,81} \sqrt{\left(\frac{0,427(1-0,427)}{75} + \frac{0,629(1-0,629)}{251}\right)} = 0,181$$

$$P^{FR} - P^{GER} = \sqrt{7,81} \sqrt{\left(\frac{0,427(1-0,427)}{75} + \frac{0,772(1-0,772)}{171}\right)} = 0,183$$

$$P^{NL} - P^{UK} = \sqrt{7,81} \sqrt{\left(\frac{0,600(1-0,600)}{85} + \frac{0,629(1-0,629)}{251}\right)} = 0,171$$

$$P^{NL} - P^{GER} = \sqrt{7,81} \sqrt{\left(\frac{0,600(1-0,600)}{85} + \frac{0,772(1-0,772)}{171}\right)} = 0,173$$

$$P^{UK} - P^{GER} = \sqrt{7,81} \sqrt{\left(\frac{0,600(1-0,600)}{85} + \frac{0,772(1-0,772)}{171}\right)} = 0,123$$

4c: Marascuilo procedure: *favourable*.

$$\begin{split} P^{FR} &= P^{NL} & \sqrt{7,81} \sqrt{\left(\frac{0,679\left(1^{-0,679}\right)}{999} + \frac{0,626\left(1^{-0,626}\right)}{999}\right)} = 0,0595 \\ P^{FR} &= P^{UK} & \sqrt{7,81} \sqrt{\left(\frac{0,679\left(1^{-0,679}\right)}{999} + \frac{0,642\left(1^{-0,642}\right)}{1460}\right)} = 0,0542 \\ P^{FR} &= P^{GER} & \sqrt{7,81} \sqrt{\left(\frac{0,679\left(1^{-0,679}\right)}{999} + \frac{0,655\left(1^{-0,655}\right)}{1000}\right)} = 0,0589 \\ P^{NL} &= P^{UK} & \sqrt{7,81} \sqrt{\left(\frac{0,626\left(1^{-0,626}\right)}{999} + \frac{0,642\left(1^{-0,642}\right)}{1460}\right)} = 0,0553 \\ P^{NL} &= P^{GER} & \sqrt{7,81} \sqrt{\left(\frac{0,626\left(1^{-0,626}\right)}{999} + \frac{0,655\left(1^{-0,655}\right)}{1000}\right)} = 0,0599 \\ P^{UK} &= P^{GER} & \sqrt{7,81} \sqrt{\left(\frac{0,642\left(1^{-0,642}\right)}{1460} + \frac{0,655\left(1^{-0,655}\right)}{1000}\right)} = 0,0547 \end{split}$$

# 4d: Marascuilo procedure: *unfavourable*.

$$P^{FR} - P^{NL} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,280(1-0,280)}{999} + \frac{0,316(1-0,316)}{999}\right)} = 0,0571$$

$$P^{FR} - P^{UK} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,280(1-0,280)}{999} + \frac{0,269(1-0,269)}{1460}\right)} = 0,0513$$

$$P^{FR} - P^{GER} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,280(1-0,280)}{999} + \frac{0,276(1-0,276)}{1000}\right)} = 0,0560$$

$$P^{NL} - P^{UK} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,316(1-0,316)}{999} + \frac{0,269(1-0,269)}{1460}\right)} = 0,0526$$

$$P^{NL} - P^{GER} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,316(1-0,316)}{999} + \frac{0,276(1-0,276)}{1000}\right)} = 0,0570$$

$$P^{UK} - P^{GER} \qquad \sqrt{7,81} \sqrt{\left(\frac{0,269(1-0,269)}{1460} + \frac{0,276(1-0,276)}{1000}\right)} = 0,0514$$

4e: Marascuilo procedure: *adopt customs*.

$$P^{FR} - P^{NL} = \sqrt{7.81} \sqrt{\left(\frac{0.454\left(1-0.454\right)}{999} + \frac{0.437\left(1-0.437\right)}{999}\right)} = 0.0621$$

$$P^{FR} - P^{UK} = \sqrt{7.81} \sqrt{\left(\frac{0.454\left(1-0.454\right)}{999} + \frac{0.289\left(1-0.289\right)}{1460}\right)} = 0.0554$$

$$P^{FR} - P^{GER} = \sqrt{7.81} \sqrt{\left(\frac{0.454\left(1-0.454\right)}{999} + \frac{0.316\left(1-0.316\right)}{1000}\right)} = 0.0602$$

$$P^{NL} - P^{UK} = \sqrt{7.81} \sqrt{\left(\frac{0.437\left(1-0.437\right)}{999} + \frac{0.289\left(1-0.289\right)}{1460}\right)} = 0.0553$$

$$P^{NL} - P^{GER} = \sqrt{7.81} \sqrt{\left(\frac{0.437\left(1-0.437\right)}{999} + \frac{0.316\left(1-0.316\right)}{1000}\right)} = 0.0601$$

$$P^{UK} - P^{GER} = \sqrt{7.81} \sqrt{\left(\frac{0.289\left(1-0.289\right)}{1460} + \frac{0.316\left(1-0.316\right)}{1000}\right)} = 0.0531$$

4f: Marascuilo procedure: want to be distinct.

$$\begin{split} \mathbf{P}^{\text{FR}} &- \mathbf{P}^{\text{NL}} & \sqrt{7.81} \sqrt{\left(\frac{0.484\left(1-0.484\right)}{999} + \frac{0.514\left(1-0.514\right)}{999}\right)} = 0.0625\\ \mathbf{P}^{\text{FR}} &- \mathbf{P}^{\text{UK}} & \sqrt{7.81} \sqrt{\left(\frac{0.484\left(1-0.484\right)}{999} + \frac{0.564\left(1-0.564\right)}{1460}\right)} = 0.0576\\ \mathbf{P}^{\text{FR}} &- \mathbf{P}^{\text{GER}} & \sqrt{7.81} \sqrt{\left(\frac{0.484\left(1-0.484\right)}{999} + \frac{0.598\left(1-0.598\right)}{1000}\right)} = 0.0619\\ \mathbf{P}^{\text{NL}} &- \mathbf{P}^{\text{UK}} & \sqrt{7.81} \sqrt{\left(\frac{0.514\left(1-0.514\right)}{999} + \frac{0.564\left(1-0.564\right)}{1460}\right)} = 0.0576\\ \mathbf{P}^{\text{NL}} &- \mathbf{P}^{\text{GER}} & \sqrt{7.81} \sqrt{\left(\frac{0.514\left(1-0.514\right)}{999} + \frac{0.598\left(1-0.598\right)}{1000}\right)} = 0.0619\\ \mathbf{P}^{\text{UK}} &- \mathbf{P}^{\text{GER}} & \sqrt{7.81} \sqrt{\left(\frac{0.514\left(1-0.514\right)}{999} + \frac{0.598\left(1-0.598\right)}{1000}\right)} = 0.0619\\ \mathbf{P}^{\text{UK}} &- \mathbf{P}^{\text{GER}} & \sqrt{7.81} \sqrt{\left(\frac{0.564\left(1-0.564\right)}{1460} + \frac{0.598\left(1-0.598\right)}{1000}\right)} = 0.0569 \end{split}$$

\_\_\_\_\_

	Ţ	Jndermining ci	ultural life			Dis	tinct customs a	and traditio	ns
	Difference	Answer cat.	Country	Classification		Difference	Answer cat.	Country	C
1	0,76	10	FRA		1	0,86	2	GER	
2	0,71	9	FRA		2	-0,60	1	NL	
3	0,70	1	UK		3	-0,57	2	NL	
4	-0,57	1	NL		4	0,57	7	NL	
5	0,49	7	NL		5	0,54	3	GER	
6	-0,41	9	GER		6	0,50	9	FRA	
7	0,34	6	NL		7	0,49	10	UK	
8	-0,34	2	NL		8	-0,47	9	GER	
9	0,33	8	UK		9	0,42	6	NL	
10	-0,29	2	FRA		10	0,38	1	GER	
11	-0,27	10	UK		11	-0,37	3	NL	
12	0,27	2	UK		12	-0,33	2	FRA	
13	-0,26	4	FRA		13	0,31	4	GER	
14	0,26	2	GER		14	-0,28	4	FRA	
15	-0,25	10	GER		15	0,28	8	NL	
16	-0,24	3	FRA		16	-0,25	2	UK	
17	-0,22	9	UK		17	-0,23	10	GER	
18	-0,20	7	FRA		18	-0,22	3	FRA	
19	0,20	8	NL		19	0,22	5	FRA	
20	-0,18	6	FRA		20	0,22	9	UK	
21	0,17	3	UK		21	-0,21	10	NL	
22	-0,16	1	FRA		22	0,21	1	FRA	
23	0,16	4	NL		23	-0,20	7	GER	
24	-0,14	7	UK		24	-0,17	6	GER	
25	-0,13	10	NL		25	-0,16	7	UK	
26	-0,12	7	GER		26	-0,15	7	FRA	
27	-0,11	5	UK		27	-0,12	3	UK	
28	-0,11	6	UK		28	-0,12	5	GER	
29	0,11	3	GER		29	-0,11	8	UK	
30	-0,10	5	NL		30	-0,11	6	FRA	
31	-0,09	3	NL		31	-0,11	4	NL	
32	0,09	5	FRA		32	-0,10	1	UK	
33	0,09	5	GER		33	-0,10	8	GER	
34	0,08	9	NL		34	-0,08	9	NL	
35	0,07	8	FRA		35	-0,08	6	UK	
36	0,06	4	UK		36	0,06	10	FRA	
37	-0,04	6	GER		37	-0,05	5	NL	
38	0,04	8	GER		38	-0,05	8	FRA	
39	0,03	1	GER		39	-0,02	4	UK	
40	0,03	4	GER		40	-0,00	5	UK	

### Appendix 5: Comparative classifications of perceived cultural distance based on two indicators

Country Classification

# Appendix 6: Perceived attitude of other origin on role men/women in household

		Very similar	Quite similar	Quite different	Very different	Total
France	Native origin	29 (9,4%)	44 (14,2%)	96 (31%)	141 (45,5%)	310 (100%)
	Yugoslavian	51 (37,8%)	31 (23%)	35 (25,9%)	18 (13,3%)	135 (100%)
	Turkish	41 (17,3%)	61 (25,7%)	69 (29,1%)	66 (27,8%)	237 (100%)
	Moroccan	51 (23%)	59 (26,6%)	81 (36,5%)	31 (14%)	222 (100%)
	Pakistani	30 (22,1%)	36 (26,5%)	44 (32,4%)	26 (19,1%)	136 (100%)
	Total	202 (19,4%)	231 (22,2%)	325 (31,3%)	282 (27,1%)	1040 (100%)
The Netherlands	Native origin	8 (2,3%)	57 (16,4%)	142 (40,9%)	140 (40,3%)	347 (100%)
	Yugoslavian	19 (13,8%)	65 (47,1%)	33 (23,9%)	21 (15,2%)	138 (100%)
	Turkish	22 (9,4%)	89 (37,9%)	79 (33,6%)	45 (19,1%)	235 (100%)
	Moroccan	37 (15,4%)	88 (36,7%)	63 (26,2%)	52 (21,7%)	240 (100%)
	Pakistani	14 (11,7%)	35 (29,2%)	40 (33,3%)	31 (25,8%)	120 (100%)
	Total	100 (9,3%)	334 (30,9%)	357 (33,1%)	289 (26,8%)	1080 (100%)
The United Kingdom	Native origin	8 (2,1%)	15 (3,9%)	281 (73%)	81 (21%)	385 (100%)
	Yugoslavian	24 (12,2%)	38 (19,3%)	58 (29,4%)	77 (39,1%)	197 (100%)
	Turkish	6 (1,9%)	91 (28,5%)	99 (31%)	123 (38,6%)	319 (100%)
	Moroccan	12 (6,5%)	52 (28,3%)	60 (32,6%)	60 (32,6%)	184 (100%)
	Pakistani	28 (8,1%)	51 (14,7%)	155 (44,8%)	112 (32,4%)	346 (100%)
	Total	78 (5,5%)	247 (17,3%)	653 (45,6%)	453 (31,7%)	1431 (100%)
Germany	Native origin	11 (3,2%)	29 (8,3%)	99 (28,4%)	210 (60,2%)	349 (100%)
•	Yugoslavian	61 (25,1%)	72 (29,6%)	61 (25,1%)	49 (20,2%)	243 (100%)
	Turkish	39 (11,3%)	70 (20,3%)	98 (28,4%)	138 (40%)	345 (100%)
	Moroccan	64 (26,1%)	85 (34,7%)	69 (28,2%)	27 (11%)	245 (100%)
	Pakistani	21 (14%)	39 (26%)	51 (34%)	39 (26%)	150 (100%)
	Total	196 (14,7%)	295 (22,1%)	378 (28,4%)	463 (34,8%)	1332 (100%)
Total	Native origin	56 (4%)	145 (10,4%)	618 (44,4%)	572 (41,1%)	1391 (100%)
	Yugoslavian	155 (21,7%)	206 (28,9%)	187 (26,2%)	165 (23,1%)	713 (100%)
	Turkish	108 (9,5%)	311 (27,4%)	345 (30,4%)	372 (32,7%)	1136 (100%)
	Moroccan	164 (18,4%)	284 (31,9%)	273 (30,6%)	170 (19,1%)	891 (100%)
	Pakistani	93 (12,4%)	161 (21,4%)	290 (38,6%)	208 (27,7%)	752 (100%)
	Total	576 (11,8%)	1107 (22,7%)	1713 (35,1%)	1487 (30,5%)	4883 (100%)

Source: (Hoksbergen & Tillie, 2016)

Appendix 7a: Opinion on the separation of church and state per countries' Muslim minority category

			ON SEPA	RATION CHU	RCH AND S		
		Agree		Neither agree		Disagree	
HOST COUNTRY		strongly	Agree	or disagree	Disagree	strongly	Total
France	Native origin	33	50	70	61	144	358
	Yugoslavian	19	24	26	28	32	129
	Turkish	65	56	48	29	32	230
	Moroccan	57	<b>54</b>	66	23	<b>29</b>	229
	Pakistani	30	45	25	18	20	138
	Total	204		235	159	257	1084
Netherlands	Native origin	11	<b>79</b>	78	129	75	372
	Yugoslavian	8	<b>28</b>	43	36	20	135
	Turkish	21	85	39	65	27	237
	Moroccan	29	97	38	57	13	234
	Pakistani	8	40	28	31	8	115
	Total	77	329	226	318	143	1093
United Kingdom	Native origin	0	7	94	147	137	385
8	Yugoslavian	23	47	14	44	30	158
	Turkish	38	46	89	63	53	289
	Moroccan	40	42	40	29	24	175
	Pakistani	19	35	77	120	<mark>41</mark>	292
	Total	120	177	314	403	285	1299
Germany	Native origin	39	78	67	129	65	378
	Yugoslavian	43	75	29	63	19	229
	Turkish	94	115	39	65	27	340
	Moroccan	25	76	55	45	19	220
	Pakistani	12	28	33	33	39	145
	Total	213	372	223	335	169	1312
Total	Native origin	83	214	309	466	421	1493
	Yugoslavian	93	174	112	171	101	651
	Turkish	218	302	215	222	139	1096
	Moroccan	151	269	199	154	85	858
	Pakistani	69	148	163	202	108	690
	Total	614	1107	998	1215	854	4788

Source: (Jacobs & Koomen, 2011)

7b: Per country	Ν	Agree strongly	Agree	Neither agree or disagree	Disagree	Disagree strongly	Overall
		(+2)	(+1)	(0)	(-1)	(-2)	
France	726	342	179	165(0)	-98	-226	0,27
The Netherlands	721	132	250	148(0)	-189	-136	0,08
The United Kingdom	914	240	170	220(0)	-256	-296	-0,16
Germany	934	348	294	156(0)	-206	-208	0,24

7c: Per ethnicity	Ν	Agree strongly	Agree	Neither agree or disagree	Disagree	Disagree strongly	Overall
		(+2)	(+1)	(0)	(-1)	(-2)	
Yugoslavian	651	186	174	112(0)	-171	-202	-0,02
Turkish	1096	436	302	215(0)	-222	-278	0,22
Moroccan	858	302	269	199(0)	-154	-170	0,29
Pakistani	690	138	148	163(0)	-202	-216	-0.19

Appendix 8: Perceived attitude other origin on role religion in society

			Very similar	Quite similar	Quite different	Very different	Total
FRA	Native origin	Count	28 (9,1%)	64 (20,8%)	98 (31,9%)	117 (38,1%)	307
	C	Expected count	38,8	60,3	104,0	104,0	307,0
	Yugoslavian	Count	38 (30,4%)	32 (25,6%)	36 (28,8%)	19 (15,2%)	125
	-	Expected count	15,8	24,5	42,3	42,3	125,0
	Turkish	Count	23 (10,5%)	33 (15%)	68 (30,9%)	96 (43,6%)	220
		Expected count	27,8	43,2	74,5	74,5	220,0
	Moroccan	Count	19 (8,7%)	38 (17,4%)	85 (39%)	76 (34,9%)	218
		Expected count	27,5	42,8	73,8	73,8	218,0
	Pakistani	Count	18 (14,1%)	29 (22,7%)	51 (39,8%)	30 (23,4%)	128
		Expected count	16,2	25,1	43,4	43,4	128,0
	Total	Count	126 (12,6%)	196 (19,6%)	338 (33,9%)	338 (33,9%)	998
		Expected count	126,0	196,0	338,0	338,0	998,0
NL	Native origin	Count	17 (4,9%)	82 (23,8%)	141 (41,0%)	104 (30,2%)	344
	C	Expected count	21,8	84,1	129,3	108,8	344,0
	Yugoslavian	Count	10 (7,9%)	52 (40,9%)	40 (31,5%)	25 (19,7%)	127
	-	Expected count	8,0	31,0	47,7	40,2	127,0
	Turkish	Count	18 (7,9%)	48 (21,1%)	84 (37,0%)	77 (33,9%)	227
		Expected count	14,4	55,5	85,3	71,8	227,0
	Moroccan	Count	13 (5,7%)	48 (21,0%)	85 (37,1%)	83 (36,2%)	229
		Expected count	14,5	56,0	86,1	72,5	229,0
	Pakistani	Count	8 (6,9%)	25 (21,6%)	42 (36,2%)	41 (35,2%)	116
		Expected count	7,3	28,4	43,6	36,7	116,0
	Total	Count	66 (6,3%)	255 (24,4%)	392 (37,6%)	330 (31,6%)	1043
		Expected count	66,0	255,0	392,0	330,0	1043,0
UK	Native origin	Count	11 (2,9%)	15 (3,9%)	174 (45,2%)	185 (48,1%)	385
	C	Expected count	13,8	59,8	170,1	141,4	385,0
	Yugoslavian	Count	24 (14,5%)	36 (21,8%)	70 (42,4%)	35 (21,2%)	165
	-	Expected count	5,9	25,6	72,9	60,6	165,0
	Turkish	Count	4 (1,2%)	81 (24,0%)	146 (43,3%)	106 (31,5%)	337
		Expected count	12,1	52,3	148,9	123,8	337,0
	Moroccan	Count	1 (0,5%)	51 (25,5%)	93 (46,5%)	55 (27,5%)	200
		Expected count	7,2	31,0	88,3	73,5	200,0
	Pakistani	Count	11 (3,3%)	38 (11,3%)	146 (43,3%)	142 (42,1%)	337
		Expected count	12,1	52,3	148,9	123,8	337,0
	Total	Count	51 (3,6%)	221 (15,5%)	629 (44,2%)	523 (36,7%)	1424
		Expected count	51,0	221,0	629,0	523,0	1424,0
GER	Native origin	Count	11 (3,2%)	44 (12,9%)	105 (30,9%)	180 (52,9%)	340
	-	Expected count	25,9	61,4	118,3	134,4	340,0
	Yugoslavian	Count	37 (16,1%)	74 (32,2%)	77 (33,5%)	42 (18,3%)	230
	-	Expected count	17,5	41,5	80,0	90,9	230,0
	Turkish	Count	15 (4,5%)	42 (12,6%)	94 (28,2%)	182 (54,7%)	333
		Expected count	25,4	60,1	115,8	131,6	333,0
	Moroccan	Count	24 (10,4%)	49 (21,2%)	108 (46,8%)	50 (21,6%)	231
		Expected count	17,6	41,7	80,4	91,3	231,0
	Pakistani	Count	11 (7,3%)	23 (15,2%)	63 (41,7%)	54 (35,8%)	151
		Expected count	11,5	27,3	52,5	59,7	151,0
	Total	Count	98 (7,6%)	232 (18,1%)	447 (34,8%)	508 (39,5%)	1285
		Expected count	98,0	232,0	447,0	508,0	1285,0

				Yugoslavian	Turkish	Moroccan	Pakistani	Total
FR	Knows the local Muslim	YES	Count	29	63	119	47	258
	representative council		% within	11,2%	24,4%	46,1%	18,2%	100,0%
		NO	Count	121	131	114	98	464
			% within	26,1%	28,2%	24,6%	21,1%	100,0%
NL	Knows the local Muslim	YES	Count	7	34	22	16	79
	representative council		% within	8,9%	43,0%	27,8%	20,3%	100,0%
		NO	Count	137	215	226	133	711
			% within	19,3%	30,2%	31,8%	18,7%	100,0%
UK	Knows the local Muslim representative council	YES	Count	16	50	21	44	131
			% within	12,2%	38,2%	16,0%	33,6%	100,0%
		NO	Count	180	271	176	304	931
			% within	19,3%	29,1%	18,9%	32,7%	100,0%
DE	Knows the local Muslim	YES	Count	58	115	90	57	320
	representative council		% within	18,1%	35,9%	28,1%	17,8%	100,0%
		NO	Count	197	236	166	104	703
			% within	28,0%	33,6%	23,6%	14,8%	100,0%
Tota	I Knows the local Muslim	YES	Count	110	262	252	164	788
	representative council		% within	14,0%	33,2%	32,0%	20,8%	100,0%
		NO	Count	635	853	682	639	2809
			% within	22,6%	30,4%	24,3%	22,7%	100,0%
					Correct		2011)	

Appendix 9a: Opinion on local Muslim representative Council per countries' Muslim minorities

Source: (Jacobs & Koomen, 2011)

Appendix 9b: Opinion on local Muslim representative Council per countries' Muslim minorities

				Yugoslavian	Turkish	Moroccan	Pakistani	Total
FR	Approves actions of the local	YES	Count	10	31	37	14	92
	Muslim representative council		% within	10,9%	33,7%	40,2%	15,2%	100%
		NO	Count	9	13	20	12	54
			% within	16,7%	24,1%	37,0%	22,2%	100%
NL	Approves actions of the local	YES	Count	3	22	7	9	41
	Muslim representative council		% within	7,3%	53,7%	17,1%	22,0%	100%
		NO	Count	2	7	6	3	18
			% within	11,1%	38,9%	33,3%	16,7%	100%
UK	Approves actions of the local Muslim representative council	YES	Count	6	21	10	22	59
			% within	10,2%	35,6%	16,9%	37,3%	100%
		NO	Count	8	17	8	19	52
			% within	15,4%	32,7%	15,4%	36,5%	100%
GER	Approves actions of the local	YES	Count	19	53	22	17	111
	Muslim representative council		% within	17,1%	47,7%	19,8%	15,3%	100%
		NO	Count	11	24	24	16	75
			% within	14,7%	32,0%	32,0%	21,3%	100%
Total	Approves actions of the local	YES	Count	38	127	76	62	303
	Muslim representative council		% within	12,5%	41,9%	25,1%	20,5%	100%
		NO	Count	30	61	58	50	199
			% within	15,1%	30,7%	29,1%	25,1%	100%

Source: (Jacobs & Koomen, 2011)

				Yugoslavian	Turkish	Moroccan	Pakistani	Total
FR	Religious views represented in	YES	Count	3	23	35	13	74
	the local Muslim representative		% within	4,1%	31,1%	47,3%	17,6%	100%
	council	NO	Count	15	25	42	16	98
			% within	15,3%	25,5%	42,9%	16,3%	100%
NL	Religious views represented in	YES	Count	1	10	10	6	27
	the local Muslim representative		% within	3,7%	37,0%	37,0%	22,2%	100%
	council	NO	Count	5	14	6	4	29
			% within	17,2%	48,3%	20,7%	13,8%	100%
UK	Religious views represented in	YES	Count	4	18	5	11	38
	the local Muslim representative council		% within	10,5%	47,4%	13,2%	28,9%	100%
		NO	Count	9	20	12	19	60
			% within	15,0%	33,3%	20,0%	31,7%	100%
GER	Religious views represented in	YES	Count	14	29	20	17	80
	the local Muslim representative		% within	17,5%	36,3%	25,0%	21,3%	100%
	council	NO	Count	23	36	23	21	103
			% within	22,3%	35,0%	22,3%	20,4%	100%
Total	Religious views represented in	YES	Count	22	80	70	47	219
	the local Muslim representative		% within	10,0%	36,5%	32,0%	21,5%	100%
	council	NO	Count	52	95	83	60	290
			% within	17,9%	32,8%	28,6%	20,7%	100%
	-				Source	o (Incoha & Ka	2011	

# Appendix 9c: Opinion on local Muslim representative Council per countries' Muslim minorities

Source: (Jacobs & Koomen, 2011)

Appendix 9d: Opinion on local Muslim representative Council per countries' Muslim minorities

				Yugoslavian	Turkish	Moroccan	Pakistani	Total
FR	Should country of origin have a	YES	Count	32	79	120	73	304
	role in local Muslim		% within	10,5%	26,0%	39,5%	24,0%	100%
	representative council?	NO	Count	69	41	56	27	193
			% within	35,8%	21,2%	29,0%	14,0%	100%
NL	Should country of origin have a	YES	Count	2	18	5	4	29
	role in local Muslim		% within	6,9%	62,1%	17,2%	13,8%	100%
	representative council?	NO	Count	4	13	14	8	39
			% within	10,3%	33,3%	35,9%	20,5%	100%
UK	Should country of origin have a	YES	Count	52	100	48	111	311
	role in local Muslim representative council?		% within	16,7%	32,2%	15,4%	35,7%	100%
		NO	Count	73	117	102	128	420
			% within	17,4%	27,9%	24,3%	30,5%	100%
GER	Should country of origin have a	YES	Count	22	83	42	28	175
	role in local Muslim		% within	12,6%	47,4%	24,0%	16,0%	100%
	representative council?	NO	Count	27	24	26	20	97
			% within	27,8%	24,7%	26,8%	20,6%	100%
Tota	Should country of origin have a	YES	Count	108	280	215	216	819
	role in local Muslim		% within	13,2%	34,2%	26,3%	26,4%	100%
	representative council?	NO	Count	173	195	198	183	749
			% within	23,1%	26,0%	26,4%	24,4%	100%

Source: (Jacobs & Koomen, 2011)

Appendix 10: 7	The specification	[S] and position	[P] of claims per country
	~r	- [~] P	[-] P

		-1	0	1	Unclassifiable	Total
France	No Muslim OBJECT frame	12	104	72	14	202
	All Muslims in general	36	56	109	6	207
	Majority most	2	2	10	0	14
	Minority a small/particular group	44	40	56	0	140
	Individual	20	22	14	0	56
	Unclassifiable Muslim	2	7	3	1	13
	Islam in general	15	37	16	0	68
	Islam mainstream	0	7	2	0	9
	Minority currents within Islam	2	7	1	0	10
	Specific religious stream / movement within Islam	4	16	5	0	25
	Unclassifiable Islam	0	1	5	0	6
	Total	137	299	293	21	750
Netherlands	No Muslim OBJECT frame	34	88	117	20	259
	All Muslims in general	52	89	143	4	288
	Majority most	3	5	14	1	23
	Minority a small/particular group	33	52	25	2	112
	Individual	21	60	19	1	101
	Unclassifiable Muslim	5	6	2	0	13
	Islam in general	28	11	24	0	63
	Islam mainstream	1	0	0	0	1
	Minority currents within Islam	2	16	0	0	18
	Specific religious stream / movement within Islam	2	4	2	0	8
	Unclassifiable Islam	0	2	1	1	4
	Total	181	333	347	29	890
United Kingdom	No Muslim OBJECT frame	8	217	113	52	390
C	All Muslims in general	26	130	131	24	311
	Majority most	1	10	4	1	16
	Minority a small/particular group	15	148	32	20	215
	Individual	9	144	19	5	177
	Unclassifiable Muslim	7	13	4	5	29
	Islam in general	9	8	6	0	23
	Specific religious stream / movement within Islam	2	4	3	0	9
	Unclassifiable Islam	1	0	0	0	1
	Total	78	674	312	107	1171
Germany	No Muslim OBJECT frame	0	1	14	1	16
·	All Muslims in general	25	11	60	3	99
	Majority most	1	4	8	0	13
	Minority a small/particular group	225	28	137	5	395
	Individual	125	4	44	1	174
	Unclassifiable Muslim	17	1	5	4	27
	Islam in general	7	0	11	0	18
	Islam mainstream	0	0	1	0	1
	Specific religious stream / movement within Islam	25	3	12	1	41
	Total	425	52	292	15	784

Appendix 11: Overview of classified clair	1
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Appendix 11a:		-1	0	+1	Unclassifiable	Tota
France	Governments	37	49	38	1	125
	Legislatives	2	9	12	1	24
	Judiciary	5	13	4	0	22
	Police and security agencies	8	14	2	0	24
	State executive agencies specifically dealing with migrants	1	0	1	0	2
	Other state executive agencies	9	4	6	0	19
	Political parties	10	10	6	1	27
	Unions	1	1	0	0	2
	Employers organisations and firms	1	1	0	0	2
	Churches	1	8	8	0	17
	Christians	1	6	3	0	10
	Media and journalists	5	4	6	0	15
	Professional organisations and groups	23	68	42	4	137
	Muslim organisations and groups	7	83	126	6	222
	Other minority organisations and groups	1	7	7	0	15
	Antiracist organisations and groups	2	2	6	0	10
	'pro-minority rights and welfare organisations and groups'	0	0	2	0	2
	General solidarity, human rights and welfare organisations	0	2	8	0	10
	Racist and extreme right organisations and groups	14	2	0	0	16
	Other civil society organisations and groups	6	7	10	1	24
	Unknown actors	3	9	6	7	25
	Total	137	299	293	21	750
Netherlands	Governments	25	100	61	2	188
(etheriands	Legislatives	47	34	17	1	99
	Judiciary	2	15	6	1	24
	Police and security agencies	11	31	10	0	52
	State executive agencies specifically dealing with migrants	1	2	0	0	3
	Other state executive agencies	0	7	6	0	13
	Political parties	22	17	17	0	56
	Unions	1	2	3	0	6
	Workers and employees	0	0	1	0	1
	Employers organisations and firms	0	2	6	0	8
	Churches	1	3	4	0	8
	Christians	0	2	0	0	2
	Media and journalists	10	23	19	1	53
	Professional organisations and groups	26	55	57	3	141
	Muslim organisations and groups	20	20	109	13	14
		1	5	5	5	144
	Other minority organisations and groups				_	
	Antiracist organisations and groups	1	0	3	0	4
	'pro-minority rights and welfare organisations and groups'	0	4	2	0	6
	General solidarity, human rights and welfare organisations	0	4	2	0	6
	Racist and extreme right organisations and groups	11	0	0	0	11
	Other civil society organisations and groups	1	2	7	0	10
	Unknown actors	19	5	12	3	39
	Total	181	333	347	29	890

(Continue on next page)

United Kingdom	Governments	14	111	45	13	183
-	Legislatives	2	2	3	0	7
	Judiciary	1	77	10	4	92
	Police and security agencies	3	120	23	4	150
	Other state executive agencies	0	4	4	0	8
	Political parties	9	35	13	6	63
	Unions	0	2	0	0	2
	Workers and employees	1	4	2	0	7
	Employers organisations and firms	1	6	11	1	19
	Churches	1	3	6	0	10
	Christians	3	8	2	0	13
	Media and journalists	6	35	17	2	60
	Professional organisations and groups	6	51	33	6	96
	Muslim organisations and groups	8	185	120	66	379
	Other minority organisations and groups	1	4	3	0	8
	Antiracist organisations and groups	1	1	3	0	5
	'pro-minority rights and welfare organisations and groups'	0	4	1	0	5
	General solidarity, human rights and welfare organisations	0	10	2	2	14
	Racist and extreme right organisations and groups	8	0	0	0	8
	Other civil society organisations and groups	0	4	12	2	18
	Unknown actors	13	8	2	1	24
	Total	78	674	312	107	1171
Germany	Governments	118	20	52	0	190
	Legislatives	13	3	13	1	30
	Judiciary	74	4	24	0	102
	Police and security agencies	74	6	4	0	84
	State executive agencies specifically dealing with migrants	4	0	6	0	10
	Other state executive agencies	7	1	3	0	11
	Political parties	25	5	26	0	56
	Unions	2	0	2	0	4
	Workers and employees	0	1	1	0	2
	Employers organisations and firms	3	0	5	0	8
	Churches	10	2	17	0	29
	Media and journalists	35	2	18	0	55
	Professional organisations and groups	16	2	19	1	38
	Muslim organisations and groups	26	4	85	10	125
	Other minority organisations and groups	3	0	0	0	3
	Antiracist organisations and groups	0	0	1	0	1
	General solidarity, human rights and welfare organisations	0	2	3	0	5
	Racist and extreme right organisations and groups	3	0	0	0	3
	Other civil society organisations and groups	2	0	1	0	3
	Unknown actors	10	0	12	3	25
	Total	425	52	292	15	784

# Appendix 11b: Forms of claims

			FRA	NL	UK	GER	Total
Repressive measures		n	32	52	158	132	374
		% within	4,3%	5,8%	13,5%	16,8%	10,4%
Political decision		n	43	34	93	39	209
		% within	5,7%	3,8%	7,9%	5,0%	5,8%
Verbal statements	Press conference	n	7	2	24	8	41
		% within	0,9%	0,2%	2,0%	1,0%	1,1%
	Newspaper interview	n	183	138	101	42	464
		% within	24,4%	15,5%	8,6%	5,4%	12,9%
	TV interview	n	7	19	12	2	40
		% within	0,9%	2,1%	1,0%	0,3%	1,1%
	Radio interview	n	1	3	5	3	12
		% within	0,1%	0,3%	0,4%	0,4%	0,3%
	Opinion article open letter	n	15	97	73	46	231
		% within	2,0%	10,9%	6,2%	5,9%	6,4%
	Editorial	n	3	6	6	4	19
		% within	0,4%	0,7%	0,5%	0,5%	0,5%
	Report book etc.	n	10	52	27	10	99
	L	% within	1,3%	5,8%	2,3%	1,3%	2,8%
	Public speech	n	36	36	72	10	154
	L	% within	4,8%	4,0%	6,1%	1,3%	4,3%
	Statement in parliament government	n	20	74	57	24	175
	organisational meetings	% within	2,7%	8,3%	4,9%	3,1%	4,9%
	Other press statements declarations	n	263	243	318	340	1164
		% within	35,1%	27,3%	27,2%	43,4%	32,4%
Conventional action	Meetings	n	42	30	56	44	172
	0	% within	5,6%	3,4%	4,8%	5,6%	4,8%
	Judicial action	n	18	38	73	58	187
		% within	2,4%	4,3%	6,2%	7,4%	5,2%
	Direct-democratic action	n	4	0	8	0	12
		% within	0,5%	0,0%	0,7%	0,0%	0,3%
	Petitioning	n	4	6	16	0	26
		% within	0,5%	0,7%	1,4%	0,0%	0,7%
Demonstrative protests		n	34	14	28	10	86
*		% within	4,5%	1,6%	2,4%	1,3%	2,4%
Confrontational protests		n	7	10	14	3	34
*		% within	0,9%	1,1%	1,2%	0,4%	0,9%
Violent protests		n	21	36	30	9	96
*		% within	2,8%	4,0%	2,6%	1,1%	2,7%
Total		n	750	890	1171	784	3595
		% within	100%	100%	100%	100%	100%

Appendix 11c: Addressees of claims	N	FRA	NL 126	UK	GER	Total
'governments'	N	70	126	196	115	507
<1 · 1 /· •	% within	9,3%	14,2%	16,7%	14,7%	14,1%
'legislatives'	N N	4	26	11	4	45
<b>y</b> 11 1	% within	0,5%	2,9%	0,9%	0,5%	1,3%
Judiciary	N	8	4	20	24	56
	% within	1,1%	0,4%	1,7%	3,1%	1,6%
Police and security agencies	N	3	8	43	9	63
	% within	0,4%	0,9%	3,7%	1,1%	1,8%
State executive agencies specifically dealing with migrants	N	0	3	0	5	8
	% within	0,0%	0,3%	0,0%	0,6%	0,2%
Other state executive agencies	N	2	2	5	6	15
	% within	0,3%	0,2%	0,4%	0,8%	0,4%
Political parties	N	2	14	9	12	37
	% within	0,3%	1,6%	0,8%	1,5%	1,0%
Unions	N	0	0	2	0	2
	% within	0,0%	0,0%	0,2%	0,0%	0,1%
Workers and employees	Ν	0	1	2	3	6
	% within	0,0%	0,1%	0,2%	0,4%	0,2%
Employers organisations and firms	Ν	1	7	9	7	24
	% within	0,1%	0,8%	0,8%	0,9%	0,7%
Churches	N	0	2	4	6	12
	% within	0,0%	0,2%	0,3%	0,8%	0,3%
Christians	Ν	5	1	3	6	15
	% within	0,7%	0,1%	0,3%	0,8%	0,4%
Media and journalists	N	7	6	22	18	53
5	% within	0,9%	0,7%	1,9%	2,3%	1,5%
Professional organisations and groups	Ν	4	8	18	3	33
	% within	0,5%	0,9%	1,5%	0,4%	0,9%
'researchers think tanks intellectuals'	N	4	5	5	4	18
	% within	0,5%	0,6%	0,4%	0,5%	0,5%
Muslim organisations and groups	N	5	45	161	0	211
Frushin organisations and groups	% within	0,7%	5,1%	13,7%	0,0%	5,9%
'Muslim: profession-based'	N	1	1	6	6	14
Wushini. profession oused	% within	0,1%	0,1%	0,5%	0,8%	0,4%
'Muslim: religion-based groups'	N	73	27	20	71	191
William. Tengton bused groups	% within	9,7%	3,0%	1,7%	9,1%	5,3%
'Muslim: other organisations and groups'	N	5	2	1,770	12	141
Wushin. Oner organisations and groups	% within	0,7%	0,2%	10,4%	1,5%	3,9%
Other minority organisations and groups	N	0,770	2	5	0	7
Outer minority organisations and groups	% within	0,0%	0,2%	0,4%	0,0%	0,2%
'other minorities: religion-based groups'	N	3	2	2	0,070	7
ouler minorities. religion-based groups	% within	0,4%		0,2%		
"other minerities, other exercises and ensure"		0,4%	0,2%	7	0,0%	0,2%
'other minorities: other organisations and groups'	$\frac{N}{04}$ within	-				
Other	% within	0,0%	0,1%	0,6%	0,0%	0,2%
Other	$\frac{N}{N}$	12	15	7	4	38
AY 11	% within	1,6%	1,7%	0,6%	0,5%	1,1%
No addressee	N	541	582	492	469	2084
	% within	72,1%	65,4%	42,0%	59,8%	58,0%
Total	N	750	890	1171	784	3595
	% within	100%	100 %	100%	100%	100%

-	Appendix 11d: Issues	Pos	ition o	f claim (	towards issue	
		-1	0	+1	Unclassifiable	Total
FRA	Immigration, asylum, and aliens politics	13	7	5	0	25
	Minority integration general	18	34	40	0	92
	Minority rights and participation citizenship rights	1	13	14	0	28
	Minority rights and participation social rights	1	2	7	0	10
	Minority rights and participation cultural rights	1	6	10	0	17
	Minority rights and participation religious rights	26	61	98	0	185
	Minority rights and participation other rights	3	3	5	0	11
	Discrimination and unequal treatment	2	4	9	0	15
	Minority social problems	35	80	17	0	132
	Interethnic, inter-, and intra-organisational relations	9	60	26	0	95
	Racism/Islamophobia in institutional contexts	6	12	35	0	53
	Non-institutional racism/Islamophobia, xenophobia and extreme right	3	13	15	0	31
	Islamophobic claims	19	2	11	0	32
	Homeland politics	0	0	0	2	2
	Transnational politics	0	0	0	19	19
	Other	0	2	1	0	3
	Total	137	299	293	21	750
NL	Immigration, asylum, and aliens politics	6	23	7	0	36
	Minority integration general	9	41	24	0	74
	Minority rights and participation citizenship rights	2	9	6	0	17
	Minority rights and participation social rights	1	5	18	0	24
	Minority rights and participation cultural rights	1	3	8	0	12
	Minority rights and participation religious rights	54	62	93	0	209
	Minority rights and participation other rights	0	0	1	0	1
	Discrimination and unequal treatment	0	5	9	0	14
	Minority social problems	64	139	50	0	253
	Interethnic, inter-, and intra-organisational relations	6	30	41	0	77
	Racism/Islamophobia in institutional contexts	6	12	63	0	81
	Non-institutional racism/Islamophobia, xenophobia and extreme right	0	3	19	0	22
	Islamophobic claims	32	1	6	0	39
	Homeland politics	0	0	0	8	8
	Transnational politics	0	0	0	21	21
	Other	0	0	2	0	2
	Total	181	333	347	29	890

(Continue on next page)

		-1	0	+1	Unclassifiable	Total
UK	Immigration, asylum, and aliens politics	2	18	2	0	22
	Minority integration general	1	24	7	0	32
	Minority rights and participation citizenship rights	0	14	5	0	19
	Minority rights and participation social rights	1	12	14	0	27
	Minority rights and participation cultural rights	1	7	8	0	16
	Minority rights and participation religious rights	8	81	76	0	165
	Minority rights and participation other rights	0	4	3	0	7
	Discrimination and unequal treatment	3	18	35	0	56
	Minority social problems	22	384	33	0	439
	Interethnic, inter-, and intra-organisational relations	2	23	18	0	43
	Racism/Islamophobia in institutional contexts	5	9	30	0	44
	Non-institutional racism/Islamophobia, xenophobia and extreme right	9	57	77	0	143
	Islamophobic claims	24	4	1	0	29
	Homeland politics	0	0	0	10	10
	Transnational politics	0	0	0	97	97
	Other	0	19	3	0	22
	Total	78	674	312	107	1171
GER	Immigration, asylum, and aliens politics	37	1	11	0	49
	Minority integration general	7	8	15	0	30
	Minority rights and participation citizenship rights	10	2	19	0	31
	Minority rights and participation social rights	2	1	5	0	8
	Minority rights and participation cultural rights	1	0	3	0	4
	Minority rights and participation religious rights	94	15	101	0	210
	Minority rights and participation other rights	0	1	1	0	2
	Discrimination and unequal treatment	1	0	5	0	6
	Minority social problems	249	17	35	0	301
	Interethnic, inter-, and intra-organisational relations	4	2	4	0	10
	Racism/Islamophobia in institutional contexts	4	5	54	0	63
	Non-institutional racism/Islamophobia, xenophobia and extreme right	0	0	38	0	38
	Islamophobic claims	16	0	0	0	16
	Homeland politics	0	0	0	4	4
	Transnational politics	0	0	0	11	11
	Other	0	0	1	0	1
	Total	425	52	292	15	784

Appendix 11e: Ob	ject actor	-1	0	+1	Unclassifiable	Total
France	No Muslim object frame	12	104	72	14	202
	All Muslims in general	36	56	109	6	207
	Majority most	2	2	10	0	14
	Minority a small/particular group	44	40	56	0	140
	Individual	20	22	14	0	56
	Unclassifiable Muslim	2	7	3	1	13
	Islam in general	15	37	16	0	68
	Islam mainstream	0	7	2	0	9
	Minority currents within Islam	2	7	1	0	10
	Specific religious stream / movement within Islam	4	16	5	0	25
	Unclassifiable Islam	0	1	5	0	6
	Total	137	299	293	21	750
Netherlands	No Muslim object frame	34	88	117	20	259
	All Muslims in general	52	89	143	4	288
	Majority most	3	5	14	1	23
	Minority a small/particular group	33	52	25	2	112
	Individual	21	60	19	1	101
	Unclassifiable Muslim	5	6	2	0	13
	Islam in general	28	11	24	0	63
	Islam mainstream	1	0	0	0	1
	Minority currents within Islam	2	16	0	0	18
	Specific religious stream / movement within Islam	2	4	2	0	8
	Unclassifiable Islam	0	2	1	1	4
	Total	181	333	347	29	890
United Kingdom	No Muslim object frame	8	217	113	52	390
ennea Ringaoni	All Muslims in general	26	130	131	24	311
	Majority most	1	10	4	1	16
	Minority a small/particular group	15	148	32	20	215
	Individual	9	144	19	5	177
	Unclassifiable Muslim	7	13	4	5	29
	Islam in general	9	8	6	0	23
	Specific religious stream / movement within Islam	2	4	3	0	9
	Unclassifiable Islam	- 1	0	0	0	1
	Total	78	674	312	107	1171
Germany	No Muslim object frame	0	1	14	1	16
Germany	All Muslims in general	25	11	60	3	99
	Majority most	1	4	8	0	13
	Minority a small/particular group	225	28	137	5	395
	Individual	125	4	44	1	174
	Unclassifiable Muslim	125	1	5	4	27
		7	0	11	0	18
	Islam in general Islam mainstream	0	0	1	0	
		25		12		1
	Specific religious stream / movement within Islam	25	3	12	1	41

Appendix 12: Position of claims towards Islamic religious rights p		FRA	NL	UK	GER	
Allowance of Islamic ritual slaughtering	-1	0	1	1	1	3
	0	4	1	1	1	7
	+1	3	1	1	0	5
	Total	7	3	3	2	15
Allowance of Islamic call to prayer	-1	0	0	1	2	3
	0	0	1	0	1	2
	+1	0	0	1	0	1
	Total	0	1	2	3	6
Right to build (visible) mosques	-1	5	6	2	18	31
	0	16	3	1	4	24
	+1	28	3	4	26	61
	Total	49	12	7	48	116
Right to build minarets	-1	1	2	0	1	4
	0	0	0	0	1	1
	+1	1	0	1	0	2
	Total	2	2	1	2	7
Provision for burial according to the Islamic rite	0	0	0	1	0	1
to the islamic file	+1	1	0	2	3	6
	Total	1	0	3	3	7
Rights regarding the establishment and running	-1	2	10	1	1	14
of Islamic schools	0	1	14	5	0	20
of Islamic schools	+1	6	15	1	0	22
	Total	9	39	7	1	56
Islamic religious classes in state schools	-1	0	2	0	14	16
Islamic rengious classes in state schools	$\frac{1}{0}$	0	1	1	1	3
	+1	0	7	0	18	25
	Total	0	10	1	33	44
Rights related to wear headscarf hair-covering	-1	11	7	0	3	21
	$\frac{1}{0}$	13	3	7	0	23
headgear for female students	+1	16	3	2	1	22
	Total	40	13	9	4	66
Diabte valated to wear backgood bein according	-1	0	15	0	19	20
Rights related to wear headscarf hair-covering	$\frac{-1}{0}$	1	0	0	2	3
headgear for teachers	$\frac{0}{+1}$	0	0	1	20	21
	Total	1	1	1	41	44
		1		0	-	9
Rights related to wear <i>burqa</i> or <i>niqaab</i> hair and face-covering	$\frac{-1}{0}$		2	7	6 0	9
headgear for female students		1	-		-	-
	+1 T + 1	0	4	1	1	6
	Total	2	7	8	7	24
Rights related to wear burqa or niqaab hair and face-covering	-1	0	0	0	1	1
headgear for teachers	0	0	0	8	0	8
	+1	0	0	2	0	2
	Total	0	0	10	1	11
Islamic religious programs in public broadcasting	-1	0	0	0	1	1
	0	1	0	0	0	1
	+1	1	1	0	1	3
	Total	2	1	0	2	5
Imams in army and prisons	0	1	0	0	0	1
	+1	2	0	1	0	3
	Total	3	0		0	

-1: anti-Muslim/Islam/xenophobic/extreme right;
0: neutral/ambivalent;
+1: pro-Muslim/Islam/antiracist/anti-extreme right

Appendix 13: Position	of claim towards	forms of Islamo	phobia per country
ippenant ist i oblight	of claim to wards	ionino or ionanio	phoola per country

Appendix 13: Position of claim towards forms of Islamoph	A		NT	I IIZ	CED	Tatal
Outside public institutions	Position	FRA	NL	UK	GER	Total
Expulsions / deportations	-1 0	10	<u>5</u> 7	1	25 0	41 18
	+1	3	2	8	9	18
	Total	16	14	9	34	73
Discrimination: other specific issues	0	10	14	2	0	4
Discrimination. Other specific issues	+1	5	0	5	1	11
	Total	6	1	7	1	15
Islamic extremism and violence	-1	26	39	13	207	285
Islame extremisin and violence	0	59	63	286	11	419
	+1	8	23	27	24	82
	Total	93	125	326	242	786
Racism Islamophobia in non-state institutions	-1	0	0	2	0	2
Rueisin Istuniophobia in non state institutions	0	1	0	1	0	2
	+1	1	2	2	4	9
	Total	2	2	5	4	13
Stigmatisation of minorities 'Muslim' or 'Islam' in public debate	-1	3	3	1	4	11
Sugnation of minorates mushin of islam in public debute	0	9	7	6	3	25
	+1	21	29	14	34	98
	Total	33	39	21	41	134
General Islamophobic claims	-1	7	24	5	4	40
	0	1	1	1	0	3
	+1	5	4	0	0	9
	Total	13	29	6	4	52
Against Islamification	-1	1	2	4	4	11
Agamsi Islammeation	Total	1	2	4	4	11
Other anti-Islam Muslim claims	-1	10	5	15	8	38
	0	10	0	3	0	4
	+1	6	2	1	0	9
	Total	17	7	19	8	51
Inside public institutions	1000	17	,	17	0	51
*	1	1	0	0	0	1
Discrimination in politics	-1 0	0	1	0	0	1
	+1	2	2	2	0	6
	Total	3	3	2	0	8
		<u> </u>			0	8
Discrimination in the labour market	-1	-	0	0	1	1
	0	0	1	3	0	4
	+1	0	3	3	3	9
	Total	0	4	6	4	14
Discrimination in the education system	+1	0	0	3		3
	Total	0	0	3	0	3
Discrimination in health and welfare services	+1		0	1	0	1
	Total	0	0	1	0	1
Discrimination in the police and judiciary system	-1	1	0	2	0	3
	0	0	0	9	0	9
	+1	1	0	16	0	17
	Total	2	0	27	0	29
Racism/Islamophobia and extreme right language in politics	-1	1	3	1	0	5
	0	1	4	0	0	5
	+1	0	27	2	8	37
	Total	2	34	3	8	47
Police racism Islamophobia and violence against minorities	-1	2	0	0	0	2
	0	0	0	0	2	2
	+1	7	3	4	4	18
	Total	9	3	4	6	22
Racism Islamophobia in other state institutions	+1	1	2	2	2	7
	Total	1	2	2	2	7
Extreme right parties: alliances and exclusion	-1	0	0	1	0	1
	+1	0	0	1	0	1
	Total	0	0	2	0	2
	Carrier	$\cdot (M Gir)$		a=1	111	

Source: (M. Giugni & Banfi, 2011)

	14: Muslims and national newspaper	Always in French, Dutch, British, German	Mostly in French, Dutch, British, German	About equally often in French, Dutch, British, German and my parents' mother tongue	Mostly my parents' mother tongue	Always in my parents' mother tongue	149
FRA	Yugoslavian	102	13	30	3	1	149
	Turkish	39	28	109	46	26	248
	Moroccan	114	42	60	16	17	249
	Pakistani	94	13	32	8	1	148
	Total	349	96	231	73	45	794
NL	Yugoslavian	64	59	24	3	1	151
	Turkish	33	58	108	39	12	250
	Moroccan	121	72	45	8	4	250
	Pakistani	46	69	28	8	1	152
	Total	264	258	205	58	18	803
UK	Yugoslavian	40	20	55	45	40	200
	Turkish	26	48	141	88	47	350
	Moroccan	52	43	76	11	18	200
	Pakistani	154	70	71	33	18	346
	Total	272	181	343	177	123	1096
GER	Yugoslavian	120	50	72	10	3	255
	Turkish	29	37	155	79	55	355
	Moroccan	125	61	47	17	6	256
	Pakistani	42	33	48	25	11	159
	Total	316	181	322	131	75	1025
Total	Yugoslavian	326	142	181	61	45	755
	Turkish	127	171	513	252	140	1203
	Moroccan	412	218	228	52	45	955
	Pakistani	336	185	179	74	31	805
	Total	1201	716	1101	439	261	3718

Source: (Tillie et al., 2013)

	lim actor categories addressing state actors	Governments	Legislatives	Judiciary	Police and security agencies	Other state executive agencies	Media and journalists	Professional organisations and groups			Total
FRA	Muslim organisations and groups	6	0	0	0	0	0	0	2	14	22
	'Muslim: profession-based'	0	0	1	0	0	0	0	0	7	8
	'Muslim: religion-based groups'	25	2	3	0	0	3	2	18	119	177
NL	'Muslim: other organisations and groups'	0	0	1	0	0	3	0	2	7	15
	'other minorities: profession-based'	0	0	0	0	0	0	0	0	2	2
	Muslim organisations and groups	10	0	0	0	1	1	1	4	60	80
	'Muslim: profession-based'	1	0	0	1	0	0	0	0	2	4
	'Muslim: religion-based groups'	17	2	1	1	0	0	0	6	23	50
UK	'Muslim: other organisations and groups'	3	0	0	0	0	0	0	0	6	10
	Muslim organisations and groups	49	0	2	11	2	6	4	38	89	204
	'Muslim: profession-based'	5	0	1	2	0	0	1	3	6	22
	'Muslim: religion-based groups'	13	1	1	2	0	3	1	12	28	63
GER	'Muslim: other organisations and groups'	32	1	6	2	0	1	1	17	27	90
	'Muslim: profession-based'	2	0	1	0	0	0	0	2	4	10
	'Muslim: religion-based groups'	16	1	8	3	3	6	1	8	50	103
	'Muslim: other organisations and groups'	0	0	0	0	0	2	0	2	8	12
Total	Muslim organisations and groups	65	0	2	11	3	7	5	44	163	306
	'Muslim: profession-based'	8	0	3	3	0	0	1	5	19	44
	'Muslim: religion-based groups'	71	6	13	6	3	12	4	44	220	393
	'Muslim: other organisations and groups'	35	1	7	2	0	6	1	21	48	127

Append	ix 16: Religious rights as national matter	Allowance of Islamic ritual slaughtering	Allowance of Islamic call to prayer	Provision for burial according to the Islamic rite	State recognition of Islamic organisations religions	Right to build minarets	Right to build (visible) mosques	Rights regarding the establishment and running of Islamic schools	Islamic religious classes in state schools	Right related to wear headscarf hair-covering headgear	"" For female students	"" For teachers	Right related to wear burga or nigaab hair and face-covering headgear	"" For female students	"" For teachers	Islamic religious programs in public broadcasting	State recognition of Muslim consultative bodies	Imams in army and prisons
FRA	Supra or transnational	0	0	0	0	0	0	0	0	1	3	0	0	0	0	0	0	0
	National	2	0	0	8	1	10	4	0	1	18	0	0	1	0	2	2	2
	Local	3	0	1	4	1	33	4	0	1	8	1	0	0	0	0	0	0
	Unknown	2	0	0	1	0	6	1	0	0	11	0	0	1	0	0	1	1
NL	Supra or transnational	1	0	0	1	0	1	0	1	0	4	0	0	2	0	0	1	0
	National	0	0	0	3	0	6	22	1	2	3	0	1	2	0	1	0	0
	Local	0	1	0	0	2	5	14	6	0	2	0	0	2	0	0	0	0
	Unknown	2	0	0	1	0	0	3	1	0	4	1	0	1	0	0	0	0
UK	Supra or transnational	0	0	0	0	1	0	0	0	5	1	1	1	0	0	0	0	0
	National	1	1	0	0	0	2	1	0	2	4	0	1	5	4	0	0	1
	Local	0	0	2	0	0	4	1	0	0	0	0	0	2	0	0	0	0
	Unknown	2	1	1	1	0	1	5	1	3	4	0	3	1	6	0	0	0
GER	Supra or transnational	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	National	2	1	0	3	1	5			1	1	9	0	4	0	2		0
	Local	0	2	2	7	1	38	1	19			23	0	2	1	0	1	0
T. ( 1	Unknown	0	0	1	0	0	4	0	2	0	0	9	0	1	0	0	0	0
Total	Supra or transnational	1	0	0	1	1	2	0	1	6	8	1	1	2 12	0	0	1	$\frac{0}{2}$
	National	5	2	0					13 25				2			5	3	3
	Local Unknown	5 6	3						25 4								1	0
	UIIKIIUWII	U	1	2	5	U	11	9	+	5	17	10	5	+	0	U	1	1 1

## Appendix 17a: Muslims' attachment to their host country

	J bee jour	seij as a p	0100110	<i>, 11051 00</i>
	FRA	NL	UK	GER
1. Very strongly	378	245	140	264
2. Strongly	315	540	422	372
3. Somewhat	269	257	583	297
4. Hardly	70	56	152	102
5. Not at all	135	53	170	266
Total	1167	1151	1467	1401

Variable label: [L] See yourself as a person of host country?

## Descriptive Statistics: Dependent Variable: See yourself as a person of host country?

Host country	Ethnic group	Mean	Std. Deviation	N	
FRA	Native origin	1,6544	,96187	379	Fre
	Yugoslavian	2,4161	1,15138	149	Bri
	Turkish	3,0891	1,38523	247	con
	Moroccan	2,8415	1,33832	246	a pe
	Pakistani	2,1986	,98695	146	
	Total	2,3736	1,30282	1167	Ove
NL	Native origin	1,8789	,73802	380	Mu
	Yugoslavian	2,4286	,97924	147	all <sub>.</sub> to s
	Turkish	2,6935	1,09232	248	as c
	Moroccan	2,3158	1,07327	247	mig
	Pakistani	2,1240	,88395	129	thei
	Total	2,2459	,99276	1151	and
UK	Native origin	1,9818	,55639	385	
	Yugoslavian	3,3636	1,07081	187	
	Turkish	3,2343	1,09281	350	
	Moroccan	3,0850	1,30240	200	
	Pakistani	3,0435	,90597	345	
	Total	2,8569	1,10312	1467	
GER	Native origin	1,8222	,83019	388	
	Yugoslavian	2,7323	1,23806	254	
	Turkish	3,9140	1,18591	349	
	Moroccan	2,7698	1,20532	252	
	Pakistani	2,9873	1,19440	158	
	Total	2,8101	1,34788	1401	
Total	Native origin	1,8349	,79319	1532	
	Yugoslavian	2,7680	1,18833	737	
	Turkish	3,2906	1,26470	1194	
	Moroccan	2,7365	1,25861	945	
	Pakistani	2,7211	1,06451	778	
	Total	2,5999	1,22673	5186	

French natives – just like Dutch, British and German natives – consider themselves (very) strongly as a person of their respective country.

Overall, we see that the Turkish Muslims score relatively negatively in all four countries and therefore seem to see themselves 'somewhat hardly' as a person of their host country. This might have to do with strong ties with their homeland (see table x: Muslims and national newspaper).

Levene's Test of Equality of Error Variances<sup>a</sup>

	1	2			
Dependent	Variable: S	See yourself	<sup>c</sup> as a person	of host	country?

F	Df1	Df2	Sig.	
34.214	19	5166	.000	

Tests the null hypothesis that the error variance of the dependent variable is equal across groups.

Fail to reject the assumption of homogenous variances; the Error Variances for the DV is not equal across groups (LaerdStatistics, 2017).

#### Tests of Between-Subjects Effects

Dependent Variable: See yourself as a person of host country?

Source	Type III Sum of Squares	Df	Mean Square	F	Sig.	Partial Eta Squared
Corrected Model	2078,808 <sup>a</sup>	19	109,411	98,746	,000	,266
Intercept	31424,978	1	31424,978	28361,773	,000	,846
Country	336,116	3	112,039	101,117	,000	,055
Group	1388,241	4	347,060	313,230	,000	,195
Country * group	282,437	12	23,536	21,242	,000	,047
Error	5723,952	5166	1,108			
Total	42857,000	5186				
Corrected Total	7802,760	5185				

Both, IVs have significant effects on the DV

19,5% of the variance in the DV can be attributed to (Ethnic) Group

The interaction effect of both IVs is significant, only 4,7% in the variance can be attributed by this interaction effect

A. R Squared = ,266 (Adjusted R Squared = ,264)

A. Design: Intercept + country + group + country \* group

#### 1. Grand Mean

Dependent Variable: See yourself as a person of host country?

		95% Confidence Interval				
Mean	Std. Error	Lower Bound	Upper Bound			
2,629	,016	2,598	2,659			

Estimates

Dependent Variable: See yourself as a person of host country?

-			95% Confidence Interval		
	Mean	Std. Error	Lower Bound	Upper Bound	
FRA	2,440	,033	2,376	2,504	
NL	2,288	,033	2,223	2,354	
UK	2,942	,029	2,885	2,998	
GER	2,845	,030	2,787	2,903	

#### Pairwise Comparisons

Dependent Variable: See yourself as a person of host country?

-			-		95% Confidence Interval for Differen	
		Mean Difference (I-J)	Std. Error	Sig. <sup>b</sup>	Lower Bound	Upper Bound
FRA	GER	-,405*	,044	,000	-,522	-,289
	UK	-,502*	,044	,000	-,617	-,386
	NL	,152*	,047	,007	,028	,275
NL	GER	-,557*	,045	,000	-,675	-,439
	FRA	-,152*	,047	,007	-,275	-,028
	UK	-,653 <sup>*</sup>	,044	,000	-,770	-,537
UK	GER	,097	,041	,116	-,012	,205
	FRA	,502*	,044	,000	,386	,617
	NL	,653 <sup>*</sup>	,044	,000	,537	,770
GER	FRA	,405*	,044	,000	,289	,522
	UK	-,097	,041	,116	-,205	,012
	NL	,557 <sup>*</sup>	,045	,000	,439	,675

All four countries differ significantly given the mean difference of the DV, except for the pairwise comparison between the United Kingdom and Germany (0,116 > 0,05).

Based on estimated marginal means

\*. The mean difference is significant at the ,05 level.

B. Adjustment for multiple comparisons: Bonferroni.

#### Univariate Tests

Dependent Variable: See yourself as a person of host country?

	Sum of Squares	Df	Mean Square	F	Sig.	Partial Eta Squared
Contrast	336,116	3	112,039	101,117	,000	,055
Error	5723,952	5166	1,108			

The F tests the effect of host country. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

#### Estimates

Dependent Variable: See yourself as a person of host country?

			95% Confidence Interval	
	Mean	Std. Error	Lower Bound	Upper Bound
Native origin	1,834	,027	1,782	1,887
Yugoslavian	2,735	,040	2,657	2,813
Turkish	3,233	,031	3,172	3,293
Moroccan	2,753	,034	2,686	2,820
Pakistani	2,588	,041	2,509	2,668

#### Pairwise Comparisons

Dependent Variable: See yourself as a person of host country?

Ĩ	2	Mean Difference	0	2	95% Confidence Inte	erval for Difference <sup>b</sup>
		(I-J)	Std. Error	Sig. <sup>b</sup>	Lower Bound	Upper Bound
Native origin	Yugoslavian	-,901*	,048	,000	-1,036	-,766
	Turkish	-1,398*	,041	,000	-1,513	-1,283
	Moroccan	-,919 <sup>*</sup>	,044	,000	-1,041	-,796
	Pakistani	-,754*	,049	,000	-,891	-,617
Yugoslavian	Native origin		,048	,000	,766	1,036
	Turkish	-,498*	,050	,000	-,639	-,356
	Moroccan	-,018	,053	1,000	-,165	,130
	Pakistani	,147	,057	,098	-,013	,306
Turkish	Native origin	1,398*	,041	,000	1,283	1,513
	Yugoslavian	,498*	,050	,000	,356	,639
	Moroccan	,480*	,046	,000	,350	,610
	Pakistani	,644*	,051	,000	,501	,788
Moroccan	Native origin	,919 <sup>*</sup>	,044	,000	,796	1,041
	Yugoslavian	,018	,053	1,000	-,130	,165
	Turkish	-,480*	,046	,000	-,610	-,350
	Pakistani	,165*	,053	,020	,015	,314
Pakistani	Native origin	4	,049	,000	,617	,891
	Yugoslavian	-,147	,057	,098	-,306	,013
	Turkish	-,644*	,051	,000	-,788	-,501
	Moroccan	-,165*	,053	,020	-,314	-,015
	Logically, the	e mean difference	of the DV	for nat	tives differs significa	ntly from any other

Logically, the mean difference of the DV for natives differs significantly from any other group. Only the pairs 'Yugoslavian-Moroccan' and 'Yugoslavian-Pakistani' do not differ significantly.

Based on estimated marginal means

\*. The mean difference is significant at the ,05 level.

B. Adjustment for multiple comparisons: Bonferroni.

Univariate Tests

Dependent Variable: See yourself as a person of host country?

-	Sum of Squares	Df	Mean Square	F	Sig.	Partial Eta Squared
Contrast	1388,241	4	347,060	313,230	,000	,195
Error	5723,952	5166	1,108			

The F tests the effect of ethnic group. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

Dependent Variable: See yourself as a person of host country?

Depen	Dependent Variable: See yourself as a person of host country?							
				95% Confide	ence Interval			
		Mean	Std. Error	Lower Bound	Upper Bound			
FRA	Native origin	1,654	,054	1,548	1,760			
	Yugoslavian	2,416	,086	2,247	2,585			
	Turkish	3,089	,067	2,958	3,220			
	Moroccan	2,841	,067	2,710	2,973			
	Pakistani	2,199	,087	2,028	2,369			
NL	Native origin	1,879	,054	1,773	1,985			
	Yugoslavian	2,429	,087	2,258	2,599			
	Turkish	2,694	,067	2,563	2,825			
	Moroccan	2,316	,067	2,184	2,447			
	Pakistani	2,124	,093	1,942	2,306			
UK	Native origin	1,982	,054	1,877	2,087			
	Yugoslavian	3,364	,077	3,213	3,515			
	Turkish	3,234	,056	3,124	3,345			
	Moroccan	3,085	,074	2,939	3,231			
	Pakistani	3,043	,057	2,932	3,155			
GER	Native origin	1,822	,053	1,717	1,927			
	Yugoslavian	2,732	,066	2,603	2,862			
	Turkish	3,914	,056	3,804	4,025			
	Moroccan	2,770	,066	2,640	2,900			
	Pakistani	2,987	,084	2,823	3,152			

## Appendix 17b: Muslims' attachment to their country of origin

Variable label: [L	] See you	rself as d	a person	of coun	try of origin?

	FRA	NL	UK	GER
1. Very strongly	421	168	644	380
2. Strongly	204	314	239	318
3. Somewhat	108	216	197	226
4. Hardly	31	43	14	69
5. Not at all	23	32	2	29
Total	787	773	1096	1022

#### Descriptive Statistics: Dependent Variable: See yourself as a person of country of origin?

Host country	Ethnic country	Mean	Std. Deviation	Ň
FRA	Yugoslavian	1,8446	1,12312	148
	Turkish	1,7831	,97610	249
	Moroccan	1,6032	,92199	247
	Pakistani	1,9510	1,10905	143
	Total	1,7687	1,02010	787
NL	Yugoslavian	2,4733	1,12743	150
	Turkish	2,1255	,96084	247
	Moroccan	2,1967	,89938	244
	Pakistani	2,6061	1,01709	132
	Total	2,2975	1,00231	773
UK	Yugoslavian	1,8450	,89722	200
	Turkish	1,1143	,42631	350
	Moroccan	1,4700	,76945	200
	Pakistani	2,0983	,82472	346
	Total	1,6232	,83276	1096
GER	Yugoslavian	2,1344	1,12234	253
	Turkish	1,7655	1,00076	354
	Moroccan	2,2627	,96268	255
	Pakistani	2,3313	1,05641	160
	Total	2,0695	1,05577	1022
Total	Yugoslavian	2,0679	1,09273	751
	Turkish	1,6533	,93392	1200
	Moroccan	1,9059	,96094	946
	Pakistani	2,2049	,98659	781
	Total	1,9201	1,00833	3678

We see a somewhat similar picture as before. Turkish Muslims see themselves relatively (very) strongly as a person of Turkey, especially those in the United Kingdom.

All ethnic groups seem to see themselves more as a person of their respective country of origin than a person of their host country. Just the (former-) Yugoslavian Muslims in the Netherlands seem to consider themselves a little more 'Dutch' (2,4286) than 'Yugoslavian' (2,4733)

## Levene's Test of Equality of Error Variances<sup>a</sup>

Dependent Variable: See yourself as a person of country of origin?

F	df1	df2	Sig.
26,648	15	3662	,000

Tests the null hypothesis that the error variance of the dependent variable is equal across groups.

a. Design: Intercept + country + group + country \* group

Fail to reject the assumption of homogenous variances; the Error Variances for the DV is not equal across groups (Grande, 2015).

### Tests of Between-Subjects Effects

Dependent Variable: See yourself as a person of country of origin?

Source	Type III Sum of Squares	df	Mean Square	F	Sig.	Partial Eta Squared
Corrected Model	524,522 <sup>a</sup>	15	34,968	39,843	,000	,140
Intercept	12989,358	1	12989,358	14800,050	,000	,802
country	263,256	3	87,752	99,984	,000	,076
group	147,743	3	49,248	56,113	,000	,044
country * group	75,999	9	8,444	9,621	,000	,023
Error	3213,977	3662	,878			
Total	17298,000	3678				
Corrected Total	3738,499	3677				

Both, IVs have significant effects on the DV

7,6% of the variance in the DV can be attributed to (Host)Country 4,4% of the variance in the DV can be attributed to (Host)Country

The interaction effect of both IVs is significant; only 2,3% in the variance can be attributed by this interaction effect

a. R Squared = ,140 (Adjusted R Squared = ,137)

## 1. Grand Mean

Dependent Variable: See yourself as a person of country of origin?

		95% Confidence Interval			
Mean	Std. Error	Lower Bound	Upper Bound		
1,975	,016	1,943	2,007		

Estimates

Dependent Variable: See yourself as a person of country of origin?

			95% Confidence Interval		
Host country	Mean	Std. Error	Lower Bound	Upper Bound	
FRA	1,796	,035	1,728	1,863	
NL	2,350	,035	2,282	2,419	
UK	1,632	,029	1,574	1,690	
GER	2,123	,030	2,064	2,183	

#### Pairwise Comparisons

Dependent Variable: See yourself as a person of country of origin?

					95% Confidence Inter		
		Mean Difference (I-J)	Std. Error	Sig. <sup>b</sup>	Lower Bound	Upper Bound	
FRA	GER	-,328*	,046	,000	-,450	-,206	
	UK	,164*	,045	,002	,044	,283	
	NL	-,555*	,049	,000	-,685	-,425	All four countries
NL	GER	,227*	,046	,000	,104	,350	differ significantly
	FRA	,555*	,049	,000	,425	,685	given the mean
	UK	,719*	,046	,000	,598	× 19	difference of the $DV(\alpha = 0,05)$ .
UK	GER	-,492*	,042	,000	-,603	-,380	$DV (\alpha = 0,03).$
	FRA	-,164*	,045	,002	-,283	-,044	
	NL	-,719*	,046	,000	-,839	-,598	
GER	FRA	,328*	,046	,000	,206	,450	
	UK	,492*	,042	,000	,380	,603	
	NL	-,227*	,046	,000	-,350	-,104	

Based on estimated marginal means

\*. The mean difference is significant at the ,05 level.

b. Adjustment for multiple comparisons: Bonferroni.

#### Univariate Tests

Dependent Variable: See yourself as a person of country of origin?

	Sum of Squares	df	Mean Square	F	Sig.	Partial Eta Squared
Contrast	263,256	3	87,752	99,984	,000	,076
Error	3213,977	3662	,878			

The F tests the effect of host country. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

#### Estimates

Dependent Variable: See yourself as a person of country of origin?

			95% Confidence Interval		
Ethnic group	Mean	Std. Error	Lower Bound	Upper Bound	
Yugoslavian	2,074	,035	2,006	2,143	
Turkish	1,697	,027	1,643	1,751	
Moroccan	1,883	,031	1,823	1,943	
Pakistani	2,247	,036	2,176	2,317	

## Pairwise Comparisons

Dependent Variable: See yourself as a person of country of origin?

					95% Confidence	Interval for Difference <sup>b</sup>
		Mean Difference (I-J)	Std. Error	Sig. <sup>b</sup>	Lower Bound	Upper Bound
Yugoslavian	Turkish	,377*	,045	,000	,260	,495
	Moroccan	,191*	,047	,000	,068	,314
	Pakistani	-,172*	,050	,004	-,305	-,040
Turkish	Yugoslavian	-,377*	,045	,000	-,495	-,260
	Moroccan	-,186*	,041	,000	-,295	-,078
	Pakistani	-,550*	,045	,000	-,669	-,430
Moroccan	Yugoslavian	-,191*	,047	,000	-,314	-,068
	Turkish	,186*	,041	,000	,078	,295
	Pakistani	-,363*	,047	,000	-,488	-,239
Pakistani	Yugoslavian	,172*	,050	,004	,040	,305
	Turkish	,550*	,045	,000	,430	,669
	Moroccan	,363*	,047	,000	,239	,488

Logically, the mean difference of the DV for natives differs significantly from any other group.

Based on estimated marginal means

\*. The mean difference is significant at the ,05 level.

b. Adjustment for multiple comparisons: Bonferroni.

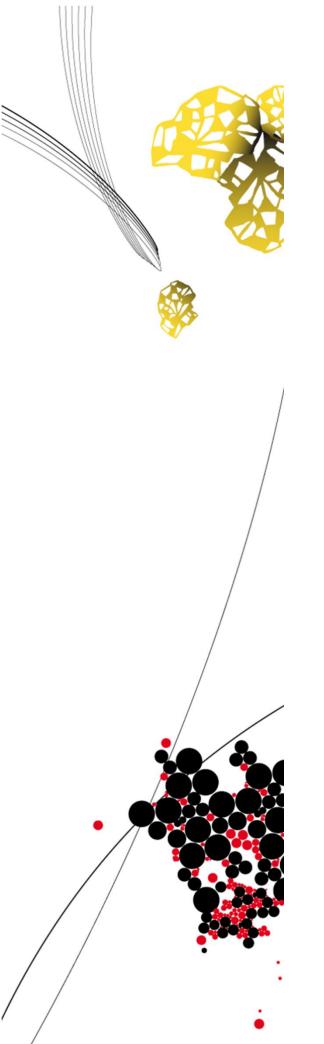
Univariate Tests
Dependent Variable: See yourself as a person of country of origin?

<u> </u>	Sum of Squares	df	Mean Square	F	Sig.	Partial Eta Squared
Contrast	147,743	3	49,248	56,113	,000	,044
Error	3213,977	3662	,878			

The F tests the effect of [L] ETHNIC GROUP. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

1	5 5 1			95% Confidence Interval		
Host country	Ethnic country	Mean	Std. Error	Lower Bound	Upper Bound	
FRA	Yugoslavian	1,845	,077	1,694	1,996	
	Turkish	1,783	,059	1,667	1,900	
	Moroccan	1,603	,060	1,486	1,720	
	Pakistani	1,951	,078	1,797	2,105	
NL	Yugoslavian	2,473	,076	2,323	2,623	
	Turkish	2,126	,060	2,009	2,242	
	Moroccan	2,197	,060	2,079	2,314	
	Pakistani	2,606	,082	2,446	2,766	
UK	Yugoslavian	1,845	,066	1,715	1,975	
	Turkish	1,114	,050	1,016	1,212	
	Moroccan	1,470	,066	1,340	1,600	
	Pakistani	2,098	,050	2,000	2,197	
GER	Yugoslavian	2,134	,059	2,019	2,250	
	Turkish	1,766	,050	1,668	1,863	
	Moroccan	2,263	,059	2,148	2,378	
	Pakistani	2,331	,074	2,186	2,476	

Dependent Variable: See yourself as a person of country of origin?



Appendix 18

## QUESTIONNAIRE

Sur les opportunités institutionnelles publiques officielles et informelles pour les minorités musulmanes dans l'Europe occidentale laïque

Auteur Matthijs Louwrens Leeuw <u>m.l.leeuw@student.utwente.nl</u>

Ce questionnaire se compose de quatre parties (A, B, C et D). Les parties A et B traitent respectivement de l'adaptation des actes religieux et de la lutte contre l'islamophobie dans l'Europe occidentale laïque. Les deux parties sont constituées d'une série d'actions et de pratiques que la littérature académique considère comme fondamentalement liées aux actes religieux islamiques et à la lutte contre l'islamophobie. La partie C traite des lignes de communications et la partie D porte sur le débat public.

Durée: environ 10 à 15 minutes.

Merci d'avance!

#### Partie A: Les actes religieux

*Pouvez- vous classer les actions et les commodités suivantes par ordre prioritaire d'importance de 1 à 13 pour votre organisation ?* 

Actes religieux et lieux de culte:

- 1. abattage rituel
- 2. appel à la prière
- 3. construction de mosquées avec des minarets
- 4. cimetières islamiques ou sections islamiques séparées
- 5. enterrement sans cercueil
- 6. écoles islamiques (publiques)
- 7. cours religieux islamiques dans les écoles publiques
- 8. financement par l'Etat des écoles islamiques
- 9. Imams dans l'armée
- 10. port du voile pour les étudiantes et les écolières
- 11. port du voile pour les enseignantes
- 12. programmes religieux islamiques sur les chaînes de service public (radio, tv...)
- 13. Imams dans les prisons.

	1	
Le plus important	1	
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	12	
Le moins important	13	

.....

*Votre organisation suit-elle le débat public national concernant les adaptations des actes religieux et des lieux de culte?* 

Si c'est le cas, la réaction de votre organisation est-elle passive, défensive ou bien est-elle ouverte à la discussion?

.....

### Partie B: La lutte contre l'islamophobie

*Pourriez-vous, de 1 à 15, classer, en tenant compte de la controverse, les différentes dimensions d'islamophobie selon votre organisation?* 

Les différentes formes d'islamophobie :

- 1. discrimination sur le marché du logement
- 2. discrimination sur le marché du travail
- 3. essence de laïcité
- 4. le musulman comme sujet de conversation au lieu d'un partenaire de conversation
- 5. controverse sur le port du voile
- 6. l'Islam et l'extrémisme religieux
- 7. satire
- 8. rhétoriques et manifestations populiste
- 9. vandalisme contre les mosquées
- 10. "Profil" islamique par les unités de Police
- 11. utilisation incontrôlée des médias sociaux et absence de supervision
- 12. les musulmans en tant que fardeau économique et social
- 13. imagerie négative dans les livres scolaires et les médias
- 14. sexualisation
- 15. Islam et titrisation

Le plus controversé	1	
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	10	
	11	
	12	
	13	
	14	
Le moins controversé	15	
Est-ce que votre organisation sui	t le déb	at public national dans la lutte contre l'islamophobie?
Si c'est le cas, votre organisation discussion?	réagit-	elle de manière passive, défensive ou bien est-elle ouverte à la
	•••••	

Partie C: Les canaux de communication

<i>Qui sont les principaux partenaires de communication concernant les actes religieux leurs lieux de culte et leur pratique?</i>
Quelles sont les principales barrières qui gênent les désirs de votre organisation en ce qui concerne les actes religieux islamiques?
Qui sont les principaux partenaires de communication concernant la lutte contre l'islamophobie?
Quels sont les principaux obstacles qui gênent les désirs de votre organisation concernant la lutte contre l'islamophobie?
5. Quelle est en général l'opinion de votre organisation sur le Conseil Musulman et sert-elle ses objectifs?
Quels sont les principaux obstacles qui peuvent (éventuellement) empêcher votre organisation d'entrer dans le débat public?
En ca qui concerne les actes religieux et la lutte contre l'islamonhobie, comment votre organisation a-

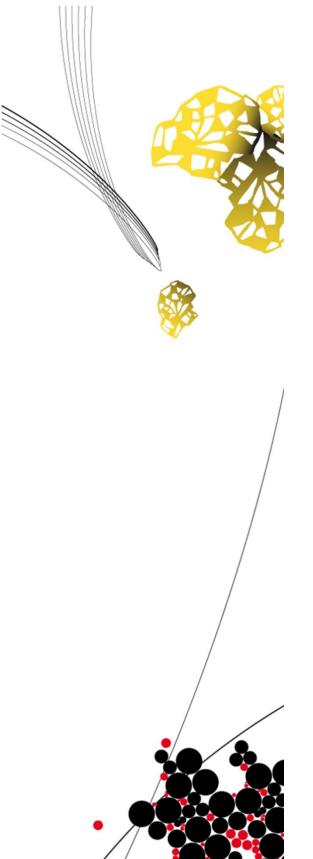
En ce qui concerne les actes religieux et la lutte contre l'islamophobie, comment votre organisation at-elle tenu compte du débat public national concernant la viibilité, l'effet boomerang, et la légitimité des revendications ? Mettre une croix (X) dans la case correspondante:

		Très injuste	Injuste	Moyen	Juste	Très juste
Visibilité	Actes religieux					
	Combat de l'islamophobie					
Effet boomerang	Actes religieux					
	Combat de l'islamophobie					
Légitimité	Actes religieux					
	Combat de l'islamophobie					

### Partie D: Le débat public

En vue des cinq dimensions suivantes, comment le débat public, d'une façon idéale, devrait-il se développer ? Autrement dit, à qui ressemblerait la déclaration idéale qui devrait informer le peuple Français?

Les acteurs (la répartition des revendicateurs dans le débat public) ..... ..... ..... ..... La forme (prise de décision publique dans les cercles privés, dialogues publics, action de protestation) ..... ..... ..... ..... Le contenu (droits religieux, anti-islamophobie, mesures formelles, pratiques commerciales *informelles*) ..... ..... ..... ..... Les destinataires/objets de la revendication (croyance, organisation, flux, individu) ..... ..... ..... ..... *Ve cadre (bases laïques, droits universels de l'homme, ordre public)* ..... ..... ..... ..... ..... ..... Le débat public connaît quatre axes principaux, à savoir: Problèmes politiques (citoyenneté, naturalisation, représentation politique) *Problèmes économiques (chômage, protection sociale) Problèmes sociaux (stigmatisation, discrimination) Problèmes religieux (vêtement religieux, religion à l'école, abattage rituel)* Cependant, ces problèmes s'entremêlent et le débat public s'emballe. Comment votre organisation gère-t-elle un bloc aussi dynamique? 



## VRAGENLIJST

over formele institutionele en informele publieke mogelijkheden voor Moslim minderheden in west seculier Europa

Auteur Matthijs Louwrens Leeuw <u>m.l.leeuw@student.utwente.nl</u>

Deze vragenlijst bestaat uit vier delen (A, B, C en D). Deel A en B behandelen, respectief, de accommodatie van religieuze handelingen en het bestrijden van Islamophobia in west seculier Europa. Beide delen bestaan uit een reeks handelingen en praktijken die de academische literatuur beschouwd als hoofdzakelijk met betrekking tot Islamitisch religieuze handelingen en het bestrijden van Islamophobia. Deel C behandelt communicatie lijnen, en deel D gaat over het publieke debat.

Duur: ongeveer 10 tot 15 minuten

Bij voorbaat dank!

### Deel A: religieuze handelingen

Kunt u de volgende religieuze handelingen en voorzieningen, met betrekking tot importantie, ordenen volgens uw organisatie van 1 tot 13?

Religieuze handelingen en voorzieningen:

- 1. Ritueel slachten
- 2. Oproep tot gebed
- 3. Bouw van moskeeën met minaretten
- 4. Aparte (Islamitische) begraafplaatsen of secties
- 5. Begrafenis zonder doodskist
- 6. Islamitische (staats-) scholen
- 7. Islamitisch religieuze lessen op staatsscholen
- 8. Staatsfinanciering van Islamitische scholen
- 9. Imams in het leger
- 10. Hoofddoek voor vrouwelijke scholieren
- 11. Hoofddoek voor leraressen
- 12. Islamitisch religieuze programma's op de publieke omroep
- 13. Imams in gevangenissen

Meest belangrijk	1	
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Mingt holongriik	12	
Minst belangrijk	13	

.....

*Volgt uw organisatie het nationaal publieke debat wat betreft religieuze handelingen, voorzieningen en de accommodatie daarvan?* 

Zo ja, reageert uw organisatie passief, defensief of gaat uw organisatie de discussie aan?

#### Deel B: bestrijden van Islamophobia

Kunt u de volgende dimensies van Islamophobia met betrekking tot controversie ordennen volgens uw organisatie van 1 tot 15?

Vormen van Islamophobia:

- 1. Discriminatie op de huizenmarkt
- 2. Discriminatie op de arbeidsmarkt
- 3. Essentie van secularisme
- 4. De Moslim als onderwerp van gesprek in plaats van gesprekspartner
- 5. Controversie over hoofddoekjes
- 6. Islam en religieus extremisme
- 7. Satire
- 8. Populistische retoriek en demonstraties
- 9. Moskee vandalisme
- 10. Islamitisch 'profilering' door politie eenheden
- 11. Ongecontroleerd social media gebruik en afwezigheid van toezicht
- 12. Moslims als sociaal-economische last
- 13. Negatieve beeldvorming in schoolboeken en media
- 14. Sexualisatie
- 15. Islam en securitisatie

Meest controversieel	1	
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	3	
	4	
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	10	
	11	
	12	
	13	
Minst controversieel	14	
winist conditiversider	15	

Volgt uw organisatie het nationaal publieke debat wat betreft (het bestrijden van) Islamophobia?

Zo ja, reageert uw organisatie passief, defensief of gaat uw organisatie de discussie aan?

Deel C: Communicatie channels

Wie zijn de belangrijkste communicatie partners met betrekking tot Islamitisch religieuze handelingen, voorzieningen en de accommodatie daarvan? ..... ..... ..... Wat zijn de voornamelijkste obstakels die uw organisatie's verlangen en doeleinden hinderen met betrekking tot Islamitisch religieuze handelingen? ..... ..... ..... Wie zijn de voornamelijkste communicatie partners met betrekking tot (het bestrijden van) Islamophobia controverses? ..... Wat zijn de voornamelijkste obstakels die uw organisatie's verlangen hinderen met betrekking tot (het bestrijden van) Islamophobia? ..... In het algemeen, wat is uw organisatie's opinie over de Moslim Raad en dient het zijn doelen? ..... ..... ..... Wat zijn de hoofdzakelijke obstakels die uw organisatie (mogelijk) weerhouden van het aangaan van *het publieke debat?* .....

Met betrekking tot religieuze handelingen en het bestrijden van Islamophobia, hoe beschouwd uw organisatie het nationaal publieke debat met betrekking tot zichtbaarheid van claims, de weerklank (echo-effect) en legitimiteit van de claims? Zet een kruisje (x) in het relevante hokje

Zichtbaarheid		Erg oneerlijk	Oneerlijk	Behoorlijk	Eerlijk	Erg eerlijk
	Religieuze handelingen					
	Bestrijden van Islamophobia					
Weerklank						
(echo-effect)	Religieuze handelingen					
	Bestrijden van Islamophobia					
Legitimiteit						
	Religieuze handelingen					
	Bestrijden van Islamophobia					

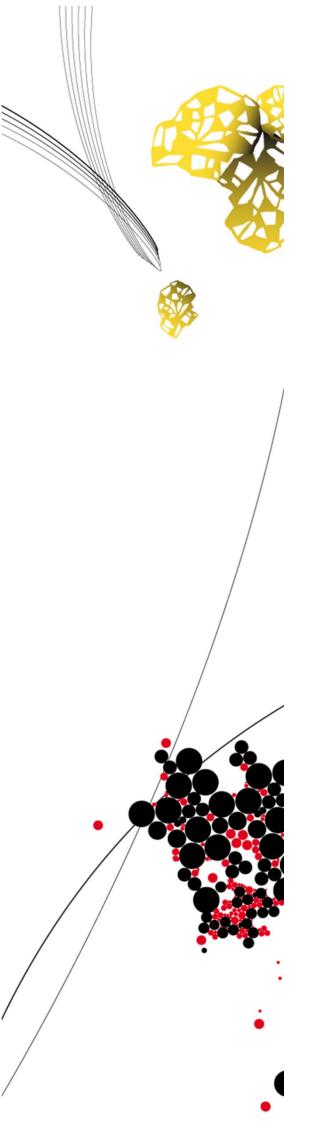
### Deel D: Het publieke debat

Met het oog op de volgende vijf dimensies, hoe zou het publieke debat zich idealiter moeten ontwikkelen? Met andere woorden, hoe zou een ideaal statement er uitzien die het Nederlandse volk moet informeren?

De actoren (de verdeling van claim-makers in het publieke debat) ..... ..... ..... De vorm (politieke besluitvorming in besloten kring, publieke dialogen, protest acties) ..... ..... ..... ..... De inhoud (religieuze rechten, anti-Islamophobie, formele maatregelen, informele handelswijzen) ..... ..... ..... De geadresseerde / objects van de claim (het geloof, een organisatie, een stroming, het individu) ..... ..... ..... *Frame* (seculiere grondbeginselen, universele mensenrechten, publieke orde) ..... ..... .....

Het publieke debat kent vier hoofdzaken, namelijk: Politieke kwesties (burgerschap, naturalisatie, politieke representatie) Economische kwesties (werkeloosheid, welzijn) Sociale kwesties (stigmatisatie, discriminatie) Religieuze kwesties (religieuze kledij, religie en school, ritueel slachten)

*Echter, raken deze kwesties met elkaar verweven en slaat het publieke debat op hol. Hoe gaat uw organisatie om met zo een dynamisch pakket?* 



## QUESTIONNAIRE

on institutional and discursive opportunities for Muslim minorities in west secular Europe

Author Matthijs Louwrens Leeuw <u>m.l.leeuw@student.utwente.nl</u>

This questionnaire consists of four parts (A, B, C and D). Parts A and B respectively deal with religious accommodation and counteracting Islamophobia in west secular Europe. Both parts consist of a range of practices and phenomena that the academic literature considers as the main occurrences when it comes to Islamic religious practices and counteracting Islamophobia. Part C deals with communication channels, while part D deals with the public debate.

Duration: approximately 10-15 minutes

Thank you in advance!

### Part A: Religious practices

Can you order the following religious practices with regard to importance according to your organisation from 1 to 13?

**Religious practices:** 

- 1. Ritual slaughter
- 2. Islamic call for prayer
- 3. Purpose-built mosques with minarets
- 4. Separate cemeteries or special burial sites
- 5. Burial without coffin
- 6. Islamic (state) schools
- 7. Islamic religious classes in state schools
- 8. State funding Islamic schools
- 9. Imams in military
- 10. Headscarf for students
- 11. Headscarf for teachers
- 12. Islamic religious programs in public broadcasting
- 13. Imams in prisons

Most important	1	
	2	
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	10	
T and immediate	11	
	12	
Least important	13	

.....

Does your organisation follow the national public debate concerning religious practices and the accommodation thereof?

#### And if so, does your organisation reacts passively, defensively or enter into discussion?

### Part B: Counteracting Islamophobia

Can you order the following dimensions of Islamophobia with regard to controversy (or contentiousness) from 1 to 15?

Forms of Islamophobia:

- 1. Discrimination in the housing market
- 2. Discrimination on the labour market
- 3. Essence of secularism
- 4. Muslims' objectification instead of subjectification
- 5. Controversy around women with headscarves
- 6. Islam as religious extremism
- 7. Satire
- 8. Populist rhetoric, extra-parliamentary mobilization and marches
- 9. Mosque vandalism
- 10. Islamic 'racial' profiling by police forces
- 11. Unbounded social media usage and lack of scrutiny
- 12. Muslims as socio-economic burden
- 13. Negative portrayals in schoolbooks and media
- 14. Sexualisation
- 15. Islam and securitization

Most controversial	1	
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Least controversial	14	
Least controversia	15	

Does your organisation follow the national public debate concerning (counteracting) Islamophobia?

.....

And if so, does your organisation reacts passively, defensively or enters into discussion?

Part C: Communication channels

If any, who are the main communication partners when it comes to Islamic religious practices and accommodation? ..... ..... ..... What are the main constraints in getting your demands heard with regard to Islamic religious practices? ..... ..... ..... ..... If any, who are the main communication partners when it comes to Islamophobia controversies? ..... ..... ..... ..... What are the main constraints in getting your demands heard with regard to counteracting Islamophobic phenomena? ..... ..... ..... Overall, what is your organisation's view on Muslim Councils, and does it serve its purpose? ..... ..... ..... If any, what are the biggest obstacles that hinder your organisation from entering the public debate? ..... ..... ..... .....

With regard to religious practices and counteracting Islamophobia, how would you perceive the national public debate with regard to visibility of claims, resonance/echo-effect and legitimacy of claims? Put a cross (x) in the relevant box

Visibility		Very unfair	Unfair	Reasonable	Fair	Very fair
	Religious practices					
	Counteracting Islamophobia					
Resonance						
	Religious practices					
	Counteracting Islamophobia					
Legitimacy						
of claims	Religious practices					
	Counteracting Islamophobia					

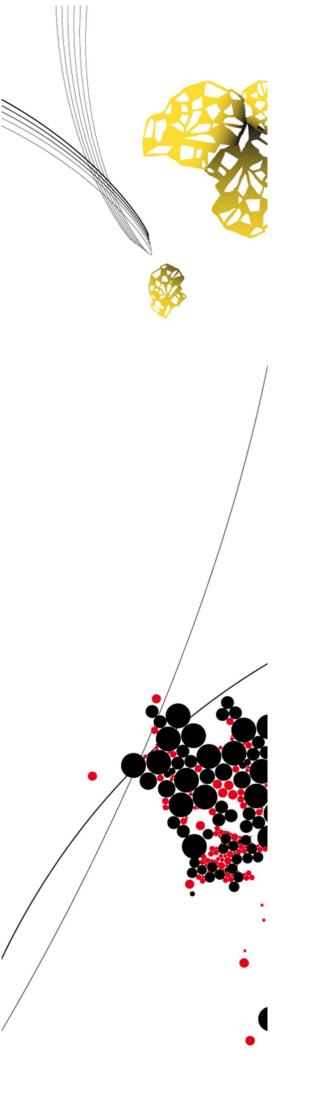
## Part D: The public debate

With regard to the following five dimensions, how should the public debate develop ideally? In other words, how would an ideal claim/statement look like that eventually inform the British public?

The actors (the share of claim-makers in the public debate) ..... ..... ..... ..... The form (political decision-making behind closed doors, public dialogues, protest actions) ..... ..... ..... ..... ..... *The issues (religious rights, anti-Islamophobia, formal measures, informal methods)* ..... ..... ..... The addressed / objects of the claim (Islam per se, an organisation, a branch, the individual) ..... ..... ..... ..... *Frame (secular principles, universal human rights, public order)* ..... ..... ..... .....

The public debate has four main pillars, namely: Political issues (citizenship, naturalisation, and political representation) Economic issues (unemployment, welfare policy) Social concerns (stigmatisation, discrimination, segregation) Religious issues (religious clothes, religion and school, ritual slaughter)

However, these issues overlap from time to time, which complicates public debates on those issues. How does your organisation deal with such a dynamic package?



# FRAGEBOGEN

über institutionelle und diskursive Chancen für muslimische Minderheiten im westlichen säkularen Europa

Autor Matthijs Louwrens Leeuw <u>m.l.leeuw@student.utwente.nl</u>

Dieser Fragebogen besteht aus drei Teilen (A, B, C und D). Teil A und Teil B behandeln religiöse Ausübungen und das Wirken gegen Islamphobie im westlichen säkularen Europa. Beide Teile bestehen aus einer Reihe von Praktiken und Phänomenen, die in der akademischen Literatur als die hauptsächlich vorkommenden Islamisch religiösen Praktiken und Mittel gegen Islamphobie gesehen werden. Teil C befasst sich mit Kommunikationskanälen. Teil D befasst sich mit die nationale öffentliche Debatte.

Dauer: ungefähr 10-15 Minuten

Vielen Dank im Voraus!

## Part A: Religiöse Praktiken

Können Sie die folgenden religiösen Praktiken nach ihrer Wichtigkeit mit Bezug auf Ihre Organisation ordnen?

Religiöse Praktiken:

- 1. Rituelle Schlachtung
- 2. Islamischer Aufruf zum Beten
- 3. Speziell angefertigte Moscheen mit Minaretten
- 4. Getrennte Friedhöfe oder spezielle Beerdigungsstätten
- 5. Beerdigung ohne Sarg
- 6. Islamische (öffentliche) Schulen
- 7. Islamisch religiöse Klassen an öffentlichen Schulen
- 8. Staatliche Unterstützung für islamische Schulen
- 9. Imame im Militär
- 10. Kopftücher für Schüler
- 11. Kopftücher für Lehrer
- 12. Islamisch religiöse Programme in öffentlichen Ausstrahlungen/ Übertragungen
- 13. Imame im Gefängnis

Am Wichtigsten	1	
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	10	
A · · · · · 1.0	11	
	12	
Am wenigsten wichtig	13	

.....

Verfolgt Ihre Organisation die nationale öffentliche Debatte über religiöse Praktiken und deren Ausübung?

### Falls ja, reagiert Ihre Organisation passiv, verteidigend oder beteiligt sich an der Diskussion?

### Part B: Vorgehen gegen Islamophobie

Können Sie die folgenden Dimensionen von Islamophobie entsprechend ihrer Kontroverse von 1 bis 15 ordnen?

Formen von Islamophobie:

- 1. Diskriminierung am Wohnungsmarkt
- 2. Diskriminierung auf dem Arbeitsmarkt
- 3. Das Wesen von Säkularismus
- 4. Die Objektivierung von Muslimen anstatt einer Subjektivierung von Muslimen
- 5. Kontroversen um Frauen mit Kopftuch
- 6. Islam als religiöser Extremismus
- 7. Satire
- 8. Populistische Rhetorik, außerparlamentarische Mobilisierung und Märsche
- 9. Vandalismus an Moscheen
- 10. Islamische "rassische" Profilerstellung durch Polizeikräfte
- 11. Unbegrenzter Gebrauch von sozialen Medien und Mangel an Überprüfung
- 12. Muslime als sozio-ökonomische Belastung
- 13. Negative Darstellung in Schulbüchern und Medien
- 14. Sexualisierung
- 15. Islam und Versicherheitlichung

	L .	
Am Kontroversesten	1	
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	11	
	12	
	13	
Am wanigstan kontrovers	14	
Am wenigsten kontrovers	15	

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Falls ja, reagiert Ihre Organisation passiv, verteidigend oder beteiligt sich an der Diskussion?

## Part C: Kommunikationskanäle

Soweit vorhanden, wer sind die Hauptkommunikationsparnter, wenn islamische religiöse Praktiken und deren Ausübung betroffen sind? ..... ..... ..... Was sind die hauptsächlichen Einschränkungen, wenn sie Ihre Forderungen in Bezug auf islamische religiöse Praktiken zur Aufmerksamkeit bringen wollen? ..... ..... ..... Falls vorhanden, wer sind die Hauptkommunikationsparnter in Bezug auf islamophobische Kontroversen? ..... ..... ..... Was sind die hauptsächlichen Einschränkungen, wenn sie Ihre Forderungen im Kampf gegen Islamphobie zur Aufmerksamkeit bringen möchten? ..... ..... ..... ..... Gesamt betrachtet, was ist die Meinung Ihrer Organisation gegenüber Muslimräten und erfüllen diese ihren Zweck? ..... ..... Falls vorhanden, was sind die größten Hindernisse, die Ihre Organisation davon abhalten, sich an der öffentlichen Debatte zu beteiligen? ..... ..... ..... .....

Hinsichtlich religiöser Praktiken und dem Kampf gegen Islamophobie, wie nehmen Sie die nationale öffentliche Debatte in Bezug auf die Sichtbarkeit ihrer Forderungen, deren Resonanz/ Echo und der Legitimität der Forderungen wahr?

Sichtbarkeit		Sehr unfair	Unfair	Angemessen	Fair	Sehr fair
	Religiöse Praktiken					
	Entgegenzuwirken Islamophobie					
Resonanz						
	Religiöse Praktiken					
	Entgegenzuwirken Islamophobie					
Legitimität						
der	Religiöse Praktiken					
Forderungen	Entgegenzuwirken Islamophobie					

Setzen Sie ein Kreuz(x) in das zutreffende Kästchen.

Part D: Nationale öffentliche Debatte.

1. Wie soll sich die öffentliche Debatte im Hinblick auf die folgenden fünf Dimensionen ideal entwickeln? Mit anderen Worten, wie würde eine ideale Aussage aussehen, wie die Deutsche Volk informieren sollten?

Die Akteure (die Verteilung der Anspruchsberechtigten in der öffentlichen Debatte) ..... ..... ..... Die Form (politische Entscheidungsfindung in privaten Kreisen, öffentliche Dialoge, Protestaktionen) ..... ..... ..... ..... Der Inhalt (religiöse Rechte, Anti-Islamophobie, formale Maßnahmen, informelle Handelspraktiken) ..... ..... ..... ..... Der Adressat / Gegenstände des Anspruchs (der Glaube an sich, eine Organisation, ein glaube Zweig, *der Einzelne*) ..... ..... ..... Rahmen (weltliche Grundlagen, universelle Menschenrechte, öffentliche Ordnung) \_\_\_\_\_ ..... ..... ..... 2. Die öffentliche Debatte hat vier Hauptthemen, nämlich: Politische Fragen (Staatsbürgerschaft, Einbürgerung, politische Vertretung) *Wirtschaftsprobleme* (*Arbeitslosigkeit*, *Wohlfahrt*) Soziale Fragen (Stigmatisierung, Diskriminierung) Religiöse Angelegenheiten (religiöse Kleidung, Religion und Schule, Ritualschlachtung) Doch, diese Fragen werden miteinander verflochten und halten die öffentliche Debatte. Wie beschäftigt sich Ihr Unternehmen mit einem solchen dynamischen Paket? .....