

**RELIGIOUS LEGACIES AND THE POLITICS
OF MULTICULTURALISM: A COMPARATIVE
ANALYSIS OF INTEGRATION POLICIES IN
WESTERN DEMOCRACIES**

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Introduction

Landmark events of global significance have repeatedly raised issues of policy convergence or divergence across nation states, as well as continuity or stability across time, or a combination of both. This is particularly true for events such as the end of the Cold War, 9/11, the area of immigration and integration policies, the politics of citizenship and multiculturalism. This paper raises these issues with an eye on the aspect of cultural path-dependency. The need to include religion and religious legacies in the analysis of these policy areas is underscored by the very fact that in many Western countries, especially post 9/11, immigration and integration debates focus on the religious, i.e. non-Christian. Even more specifically, Muslim backgrounds of immigrants contextualize the issue of immigrants' integration in light of a more fundamental debate on the compatibility of modern democracy and Islam.¹ The renewed interest in religion as a political force also in Western or largely secularized societies is not surprising.² What is surprising is the relative lack of an effort to relate the religious legacies of the host societies (and not just the immigrants' religious backgrounds) with the analysis of immigration and integration policies.

As Tomas Hammar reminds us, the very concept of citizenship in the pre-modern past was closely connected to religion and modern citizenship and can be seen as one of the results of secularization.³ The well known argument by Rogers Brubaker (1992) about the role of "cultural idioms" for citizenship can be linked to religious components of cultural and national identities.⁴ Finally, the current debates regarding Muslim integration in Western democracies or Turkey's status as a membership candidate for the EU most vividly illustrates how religious arguments draw distinct dividing lines of access and membership. Yet, very few studies in the field of comparative politics asks what role religion plays in the functioning of multi-cultural societies. Moreover, surprisingly few systematic and empirical studies are available which investigate how national political – and politico-religious – contexts shape actions and claims making by groups with different ethnic and cultural backgrounds. The few

studies which explicitly address the interplay of religion on both sides deal with few cases only and are limited in the reach of their findings, especially with regard to the topics of convergence and continuity.⁵

This paper attempts to offer such a systematic analysis of the relationship between religious legacies of receiving countries of immigration and the politics of multiculturalism (a term which is used synonymously with terms like integration or incorporation, see below). It aims to discuss the issues of continuity and change, of convergence and divergences in these policy areas in light of arguments about cultural path-dependency as they are used, for example, in secularization theory. Hence, the central question is: does variation in the politics of multiculturalism correlate with cultural and religious variations, and to what extent can it be attributed to these differences within the world of Western democracies? Especially when it comes to the issue of integration of some religious “others” into a society historically shaped by one or the other Christian denomination, one might hypothesize that cultural heritage in Western democracies (i.e. Catholicism vs. Protestantism) can account for variation in immigration and integration policies, as has been found for other policy areas as well.⁶ This is the argument of divergence. Alternatively, one might predict that in the face of Muslim immigration and particularly after 9/11 these differences pale in light of a “Western” response against the perception of an “anti-Western threat”. This is an argument in favor of convergence.

Religious legacies, however, should not be confined to the issue of denominations. Rather other dimensions of the religious factor should be considered as well, in particular the institutional arrangement of church-state relations and the degree of an official recognition of organized religion, the degree of secularization and also the existence and importance of religiously oriented political parties. For example, one recent study on state accommodation of Muslim religious practices in three Western European countries (UK, France, Germany) argues that the inherited particularities of church-state relations can better explain a nation’s

approach to Islam and the type of religious demands that Muslims have made than can the political resources of the Muslim communities, the political opportunity structures available to them or ideological factors such as a nation's ideas on citizenship and nationality.⁷ Other studies emphasize the importance of a Christian Democratic model of politics and policies⁸ which, by implication, means that a vigorous role of Christian Democratic parties in a nation's politics should also affect the politics of multiculturalism.

In light of this, the paper tries to “map” the patterns of religion with regard to the politics of multiculturalism. Having established the general patterns, it asks to what extent landmark events such as the end of the Cold War and 9/11 have affected these policies and – possibly – contributed to a policy convergence. The general argument of this paper is that national legacies (or path dependence) are still an important impediment for real convergence of policies across countries, despite the pluralization of the international order after 1989, despite globalization, EU-integration and also 9/11. The paper is built on the conceptual framework developed elsewhere with regard to 19 Western democracies, a group of countries characterized by a certain size, high levels of socio-economic development, stable democratic systems and a (Latin) Christian religious legacy.⁹

Processes of pluralization and globalization: New challenges to the political regulation of religion and the functioning of democracies

For a long time, the so-called “Western world” has been interpreted as undergoing a long-term process of secularization or decline of religion, the replacement of religious values by secular values. However, there is sufficient empirical evidence to demonstrate that even in the West, religion is a power that does not want to vanish.¹⁰ First, many religious traditions encourage the formation of conservative or fundamentalist religious movements, even in established democracies, among non-Christian and Christian traditions alike, not to mention developing countries.¹¹ Second, many Western countries experience an increasing public role

of established and non-mainline churches – a process, which José Casanova (1994) calls the “deprivatization of religion”.¹² Third, one should also include the multitude of new sects, religious cults, and small religious communities, although the spread of New Age, Buddhist and other cults in the Western world are difficult to measure and to interpret.¹³ Finally, one of the effects of 9/11 was to bring back religion as a marker for violent global conflicts, almost a self-fulfilling prophecy of Huntington’s scenario of civilizational clashes around the world in which “the West” is posited against “the rest”.¹⁴

In Europe, more than anywhere else, many signs have pointed at a receding political impact of organized religion since the 1960s, such as church attendance rates, the number of priests per population, the participation of the young, the knowledge of the faiths.¹⁵ But even here, the pluralization and increasing heterogeneity of the religious map leads to a growing number and intensity of conflicts at the intersection of politics and religion. One of the most visible examples is the immigration and growth of non-Christian minorities, in particular Muslims. They are at the center of current controversies about multiculturalism, integration of ethnic and religious minorities, and transnational identities.¹⁶ There are also those immigrant minorities which have a Christian background but of a rather different theological background of Eastern European Orthodoxy or Christianity in the developing countries. Moreover, there is an increasing number of atheists or unaffiliated. For example, in Germany, with the accession of the GDR in 1990, the percentage of officially counted non-religious, or those not affiliated with any church jumped from a few in the old Federal Republic to about 27% today.¹⁷ Finally, it is the European integration process itself which triggers new and heated discussions, such as the issue of religious references in the preamble of the future constitution of the EU, or even more vividly the debate concerning whether Turkey, for religious and cultural reasons, belongs to Europe and should be an EU member or not.¹⁸ An overview of the current religious complexity of Western societies is given in Table 1.

Table 1: Religious Diversity in 19 Western Democracies (mid 1990s or most proximate year, in per cent of resident population)

	<i>Protestant</i>	<i>Catholic</i>	<i>Jewish</i>	<i>Muslim*</i>	<i>Orthodox</i>	<i>Other</i>
<i>Austria (A)</i>	5	78	0.1	2.6	-	0.2
<i>Australia (AUS)</i>	36.3	26.2	0.44	1.1	2.8	4.8
<i>Belgium (B)</i>	0.4	88	0.35	3.8	-	n.d.
<i>Canada (CND)</i>	30	40.3***	1.2	0.9	4.7***	8.8
<i>Denmark (DK)</i>	89	0.62	0.06	2.8	-	n.d.
<i>Finland (FIN)</i>	86.6	-	-	0.4	1.1	n.d.
<i>France (F)</i>	1.6	81	1.2	7.0	0.2	n.d.
<i>Germany (D)</i>	34.1	33.4	0.04	3.3	0.6	0.7
<i>Great Britain(GB)</i>	71.8	13.1	0.52	2.7	-	1.3
<i>Ireland IRE)</i>	3.7	87.8	0.8	0.2	-	n.d.
<i>Italy (I)</i>	0.09	90	0.05	1.0	-	n.d.
<i>Netherlands (NL)</i>	26	36	0.19	4.6	-	n.d.
<i>New Zealand (NZ)</i>	38.5	13.8	-	0.4	-	13.4
<i>Norway (N)</i>	89	0.83	-	0.5	-	n.d.
<i>Portugal (P)</i>	0.5	93	0.02	0.3	0.2	1.3
<i>Spain (SP)</i>	0.1	97.3	0.03	0.7	-	0.4
<i>Sweden (SW)</i>	91.7	1.7	0.19	1.2	1.17	0.03
<i>Switzerland (CH)</i>	40.1	46.3	0.26	3.0	1.04	0.42
<i>USA</i>	52.6**	26	2.6	1.8	1.5	n.d.

*) Data for Muslims in Europe are estimates for the late 1990s by Maréchal and Dassetto (2003). In general, they exceed those from other sourcebooks such as Fischer's Weltalmanach (e.g. here the percentages for Muslims in Belgium are 2.5%, in France 5.1%, in the UK 1.4%, in the Netherlands 3%, in Switzerland 2.2%). In a few countries, Maréchal and Dassetto's estimates are below those in other sources (Germany 3.7%, Italy 1.24%, Spain 0.75%).

***) This figure includes 23% evangelical Christians as measured by survey data (Wald 2003: 161).

****) These figures are for 2000 in Noll (2002).

Note: Countries in which Islam constitutes the third largest religious community are shaded grey, countries in which Islam constitutes the second largest religious community are shaded grey and in bold.

Sources: Maréchal/Dassetto (2003: tables 1 and 2); Noll (2002: 282f.); Fischer Weltalmanach (1999), various governmental sources, statistical yearbooks etc. (1990s).

The data in Table 1 show that in 14 of 19 Western democracies Islam is the third or even second largest religious community. The five countries where Islam is second are, except for Denmark, all Catholic and located in the South and West of Europe. Somewhat mirroring this pattern, it is in particular the group of Protestant immigrant countries Australia, Canada and the United States, plus Finland, in which the Orthodox church takes third or second place. Some argue that within Western democracies religious traditions, in particular Protestantism

or Catholicism, assume a particular role in shaping politics and policies, such as social policies or policies of immigration and integration, that there are so-called “families of nations” shaped, in part, by particular Christian legacies.¹⁹

All these developments push in the same direction: the established institutional and political arrangements to regulate the relationship between religion and politics in the framework of liberal democracies, long seen to have been solved once and for all, are challenged fundamentally and require new justifications. Even without 9/11 the multicultural facts of modern Western society raise new (and very old) questions about the political regulation of religion. Accordingly, we see some major shifts in the debate in two groups of Western democracies, the ones with a more or less established church structure, and those with a more or less clear separation between church and state.²⁰

In the first group (Great Britain, the Federal Republic of Germany as well as the Scandinavian countries) we witness increasingly conflictual processes of realigning religion in the public sphere, for example with regard to the role of religious education (an increasingly controversial topic in Germany), the presence of headscarves and Christian symbols in public, the fight for religious freedom for non-Christian churches (e.g. the debate in Great Britain regarding the recognition of Muslim communities and the conflicted position of the established Church of England, or the steps towards disestablishment of the state church in Sweden in 2000.²¹ But also in the “separationist group” (the US and France, but also Turkey), the established role of religion is experiencing increasing pressures from actors who interpret the neutrality and indifference of the state in religious matters as an adoption of particular political positions at the expense of religion. Secularism is seen not as a guarantee for state neutrality and a balance between all religious forces, but as a political program equivalent to a secularist state religion.²²

Moreover, these developments in various parts of the world are accelerated by and interwoven with economic and cultural globalization processes.²³ The weakening of state

institutions and national identities by these processes, which are even more dramatically highlighted by internal conflicts in the developing world, result in an ideological vacuum. This provides an opportunity for religious traditions, or their “re-inventions”, to gel into cores of cultural identities, projects of transnational unities and of loyalties. It is this scenario where Huntington’s argument of a “clash of civilization” unfolds its most persuasive power.²⁴

It is against this backdrop, that specific effects of 9/11 on current politics of immigration and integration in Western democracies need to be analyzed. But such an analysis can only begin if the developments and patterns which precede September 2001 are well understood. The following provides a general overview of the various approaches towards multiculturalism in the Western world and their relationship to particular religious legacies.

Conceptualizing the politics of multiculturalism: Towards a comparative-analytical framework

In order to situate comparative immigration and integration policy research into the larger field, it is worth remembering that Gabriel Almond and G. Bingham Powell distinguish four kinds of public policies, i.e. (a) policies of extraction, (b) policies of distribution, (c) policies of regulation and (d) symbolic policies.²⁵ The former two largely involve money in terms of taxation and spending. It is the third type, “the exercise of control by a political system over the behavior of individuals and groups in the society”,²⁶ along with the fourth, which is of special interest here. To a large extent, immigration and integration policies belong to this type, as does the politics of civil liberties including human security. Many of the domains that Almond and Powell attribute to the type of regulatory policies such as family relations, personal conduct, protection of the person and religious activities²⁷ belonged historically, at least in Europe, to the domain of the church instead of the state. This mirrors

the fact that historically, citizenship was based on membership in particular religious communities.²⁸

An obvious problem for a cross-country comparative study of integration policies lies in the absence of any systematic and comparable data. Some might argue that on a global scale, differences in integration policies are fading, at least among Western democracies, due to processes of globalization and the emergence of transnational actors and approaches, particularly in the context of European integration and harmonization.²⁹ This would render such a comparative analysis obsolete. But I argue that despite some processes of convergence due to globalization and European integration and to like reactions of Western nations to new waves of immigration, nation states still remain the principal actors in establishing boundaries of territory and citizenship, and control access and manage ethnic relations internally.³⁰ For the analysis at hand, the data collection in a five-country study by Koopmans et al.³¹ is very useful because it includes a variety of measures and indicators for the comparative analysis of the politics of citizenship and ethnic relations. Koopmans et al. analyze France, Germany, the Netherlands, Switzerland, and the United Kingdom; for the remaining fourteen countries of interest in this study, data had to be collected case by case.

In order to manage the complexities of the issues at hand, several assumptions and qualifications are applied in this paper. First, the analysis follows the fundamental distinction made, among others, by Hammar who (in one of the first comparative studies of immigration policies) differentiates between the politics of immigration control and immigrant policy. The first refers to “the rules and procedures governing the selection and admission of foreign citizens”³² and has been the subject of an earlier comparative analysis.³³ The second involves “the conditions provided to resident immigrants”.³⁴ It includes aspects of integration and the management of cultural pluralism and shall be at the core of our analysis here. Another limitation concerns the concentration on policy output as opposed to policy outcomes.³⁵ While the former refers to official governmental policies and legislation, the latter includes the

implementation of the policies and its societal consequences, for example immigration rates or (xenophobic) reactions to certain laws or regulations. The relationship between outputs and outcomes is at the heart of many studies of immigration and one of the core meanings of the question whether politics matters. But here, it is of secondary importance, as is the political discourse on immigration and integration, which more often than not differs from official policies.

The concept of integration policies I employ borrows heavily from the work of other experts in the field.³⁶ In particular, the conceptual framework developed by Ruud Koopmans and Paul Statham seems fruitful for such a comparison.³⁷ In this, they distinguish two dimensions of integration, one based on individual rights, such as access to citizenship and benefits, voting rights, another based on cultural group rights such as the recognition of religious communities, education, and political representation.³⁸ Following this distinction, the comparison in this paper addresses measures of cultural integration in order to determine the policy approaches prevalent in each of the 19 countries in the wake of the acceleration of migration flows after 1989 and to discuss changes and the role of religious legacies and other (political) factors for them before and after 9/11.³⁹

For a measure of cultural integration policies, the logic of Koopmans et al. (2005)⁴⁰ is applied by considering cultural and religious rights outside of and within public institutions. The selection of criteria for group rights is guided by the reasoning that in many countries Muslims constitute the largest non-Christian religious minority (see above table 1) and that they are therefore not only more visible as a distinct cultural group but that their distinctiveness as “cultural others” provides a particular challenge to Western societies’ integration policies. Hence there is a particular focus on Islamic practices in assessing cultural group rights although in theory they would apply to other groups as well. These rights belong to two of the five dimensions analyzed by Koopmans et al.: religious rights outside of public institutions (ritual slaughter, Islamic calls to prayer, and provisions for Muslim burials) and

cultural rights in public institutions (state recognition and funding of Islamic schools: The provision of Islamic religious classes in state schools, the right of female teachers to wear the Islamic headscarf, the provision of programs in immigrant languages in public broadcasting, Islamic religious programs in public broadcasting; for details see appendix). The other three dimensions (political representation rights, affirmative action and cultural requirements for naturalization) are not considered here because they touch upon other policy concerns such as political integration and formal citizenship requirements. Table 2 shows these values for the five countries in Koopmans et al. and adds the other countries with the help of data on these indicators in the comparative literature and in primary sources. Because the primary focus of the paper is the overall cross-national patterns of policy approaches post 1989 and in order to simplify the analyses that follow, the scores for the two time points of 1990 and 2002, where available, are averaged (for details see appendix).

Table 2: A Scale of Cultural Integration – Cultural Group Rights in Western Democracies (1990s)

<i>Low (-1 – -0.34)</i>	<i>Medium (-0.33 – +0.33)</i>		<i>High (+0.34 – +1)</i>
CH	A	FIN	AUS
F	B	I	CND
IRE	D	N	NL
P	DK	SP	NZ
	GB	USA	SW

Sources: see appendix.

The distribution shown in Table 2 summarizes a wide range of cultural integration policies with two distinct poles. On one end are countries with a traditionally assimilationist and (with the exception of Switzerland) unitary approach to cultural difference, on the other end the “usual suspects” of multicultural democracies appear, i.e. the classical “settler countries” along with the Netherlands and Sweden. Interestingly, the United States – as well as Great Britain – do not score as high as the other older immigration countries but are at the high end of the middle group.⁴¹ Moreover, cultural integration policies do not match political integration policies, as measured, for example, by voting rights for non-citizens.⁴² There is very little overlap: only one country, Switzerland, is ranked low in both dimensions, and only

two, New Zealand and Sweden rank high in both. All other countries exhibit a mix of policies.⁴³

A closer look at cultural group rights at separate data points in 1990 and 2002 reveals a general shift away from policies of “cultural monism” towards “cultural pluralism” in most countries but no signs of convergence.⁴⁴ The biggest shifts occurred in Portugal, Switzerland, Germany and Denmark (starting at a lower level of – 1.00, – 0.90, – 0.47 and 0.00, respectively, in 1990) and in Sweden and the Netherlands (at a higher level of 0.33 and 0.63, respectively). In contrast to this, Great Britain and France experienced little, and Belgium and Italy no change in this period, whereas in Australia a reverse shift away from cultural pluralism could be observed (for details on these shifts, see below).

Table 3: A Typology of Immigration and Cultural Integration Policies (1990s)

		Cultural Integration (Religious and Cultural Group Rights)		
		<i>Low</i>	<i>Medium</i>	<i>High</i>
Immigration Policies	<i>Restrictive</i>	Switzerland	Austria Denmark Germany Norway	
	<i>Moderate</i>	France Ireland Portugal	Belgium Great Britain Finland Italy Spain	
	<i>Open</i>		USA	Australia Canada New Zealand Netherlands Sweden

Sources: see appendix and Minkenberg (2004)

It could be argued that integration policies are a function of a country’s immigration policy. After all, if a country pursues an open immigration policy it could be expected to make an effort to accommodate the various new migrants groups in politics and culture. But this holds true only with a few qualifications. Table 3 demonstrates that there is a moderate relationship between a country’s immigration policy and its cultural integration policy. While there is only one country with a “consistently” restrictive position on these two scales, i.e. Switzerland, the

group of high level of multicultural policies is also the group with a rather open immigration policy. It should not come as a surprise that those countries which experienced a long history of immigration and cultural diversity should match their immigration and integration policies (Australia, Canada, New Zealand and to some degree the United States). But in the European context, Sweden and the Netherlands clearly stand out.⁴⁵ A particular discrepancy is found in the two Central European countries Germany and Austria where the growing acceptance of multicultural policies does not reflect an opening of immigration policies. Rather, it appears forced upon the political system by growing pressures of cultural diversity from within rather than stemming from a political strategy to open up to the outside.⁴⁶ This policy pattern dissolves, however, when cultural integration is replaced by political integration.⁴⁷ There is no clear relationship between these two policies, with only Switzerland consistently restrictive in both regards whereas New Zealand and Sweden are consistently open.⁴⁸

The role of religious legacies: Confessional patterns, secularization and church-state relations

As shown earlier in Minkenberg (2004), standard explanatory models of comparative policy research have not yielded clear results with regard to immigration policies, although some patterns could be identified. In⁴⁹ the following, the religious dimension will be introduced and it will be discussed in particular whether F. Castles' model of "family of nations" is appropriate in analyzing variations in immigration policy.⁵⁰ Unlike in Castles' studies, however, religion will not be reduced to the confessional heritage or role of Catholic parties. Instead, following earlier analyses, the religious factor is decomposed into a historic-cultural dimension, i.e. the role of confessional patterns, and a socio-cultural dimension of religiosity, as measured in church-going rates, further institutional dimension of patterns of church-state relations.⁵¹ Moreover, a more political dimension is introduced by looking at religious parties and movements separately and at type of democracy.

The first step involves the cultural legacy of religion. In order to measure this legacy, two dimensions are considered: the confessional composition of a country which, if at all, is the standard variable of religion's input in comparative public policy research, and the level of religiosity as a measure of a country's "embeddedness" in religious practice.⁵² In terms of the secularization argument, the first might be seen as an indicator of a country's cultural differentiation, or cultural pluralism, whereas the second points to the country's path of secularization as disenchantment. Most texts that emphasize the role of confessions in a nation's history classify countries as Catholic, Protestant, or confessionally mixed, and most of them, as well as some of the public policy literature (see above), assert a long-lasting influence of these cultural patterns on current policy and politics.⁵³ Following David Martin, three categories will be used for the countries under consideration: (1) cultures with a Protestant dominance, resulting either from a lack of Catholics (the Scandinavian countries) or because Catholic minorities arrived after the pattern had been set (England, the United States); (2) cultures with a historical Protestant majority and substantial Catholic minorities (the Netherlands, Germany, Switzerland) where a cultural rather than a mere political bipolarity has emerged along with subcultural segregation; (3) cultures with a Catholic dominance and democratic or democratizing regimes (France, Italy, Belgium, Austria, Ireland) that are characterized by large political and social fissures, organic opposition, and secularist dogmas.⁵⁴

The second component of the cultural legacy is the actual degree of individual attachment to established religion. This is important because high levels of religiosity assure churches high legitimacy as political actors. Moreover, religiosity may be a better predictor for public policy than confessional composition alone if the question whether a country is Catholic or Protestant is considered less important than whether Catholics or Protestants actually attend church or believe in the teachings of the church. In this analysis, religiosity is measured by frequency of churchgoing rather than by religious beliefs because it ties

religiosity to existing institutions rather than more abstract religious concepts and values. Data on churchgoing in the 19 countries analyzed here are taken from the 1980s and 1990s waves of the World Values Survey.⁵⁵ The data for the 1980s and 1990s are then averaged and the countries are grouped according to the frequency of church-going ranging from low (less than 20% who go at least once a month), to medium (20 – 40%), to high (above 40%).⁵⁶

The relationship between the religious legacies of the 19 countries and their integration policies is presented in Table 4. The overall picture suggests a denominational effect on integration policies. Predominantly Protestant countries exhibit moderate-to-high levels of the recognition of cultural group rights whereas Catholic countries fall in the range of low-to-moderate levels. In this regard, it is noteworthy that the shifts towards cultural pluralism from 1990 to 2002 occurred mostly in Protestant countries – regardless of their “starting point” – whereas Catholic countries remained more static in this period (see appendix).

The notion of clustering a unique Southern or Mediterranean group of countries with regard to their policies⁵⁷ is not supported by the distribution in Table 6. In part, this misconception results from mixing up immigration rates and immigration policies.⁵⁸ While Mediterranean countries share the common fate of being latecomers as receiving countries, their approach to integration is also shared by other, non-Mediterranean countries as well (Belgium, Austria). My analysis suggests that what this group has in common is their religiosity, not their geography. This is also true with regard to the growing proportion of Muslims in these countries. All four countries, all Catholic, where Islam is the second religion (see Table 1), employ a low-to- moderate integration policy. Secularization measured in church-going rates underscores this trend. With the exception of Canada, all countries with high church attendance, show low-to-moderate recognition of group rights. On the other hand, again with the notable exception of France, countries with low church-going rates are more ready for such an integration policy.

Table 4: Religious Legacies: Confessions, Religiosity, State-Church Relations and Cultural Integration Policies

	Recognition of Group Rights		
	<i>Low</i>	<i>Moderate</i>	<i>High</i>
<i>Predominantly Protestant</i>		Great Britain <i>Denmark</i> <i>Finland</i> <i>Norway</i> USA	<u>Australia</u> <u>New Zealand</u> <i>Sweden</i>
<i>Mixed Protestant</i>	Switzerland	Germany	<u>Netherlands</u> Canada
<i>Catholic</i>	<u>France</u> Ireland Portugal	Austria Belgium Italy Spain	

Note: Countries in **bold** are those with **high religiosity**; countries in *italics* with *low religiosity*. Countries that are underlined fall into the category of strict church-state separation.

Finally, one must go beyond confessions and church-going rates when looking for a common religious denominator for the group with open immigration policies. As I have demonstrated in prior analyses, the regime of church-state relations can also partially explain variations in particular public policies.⁵⁹

This institutional dimension of religious legacies is measured by the degree of deregulation of churches in financial, political and legal respects. This procedure applies a six-point scale developed by Chaves and Cann (1992)⁶⁰ and adds two more criteria related to public support for religious education.⁶¹ Chaves and Cann point out that regardless of the official relationship between church and state, by definition Catholic societies are much less pluralistic in religious terms than Protestant societies and that different dynamics are at work.⁶² But as the data in Table 1 demonstrated, this historical disequilibrium is already in the process of revision. For the purpose of the analysis here, the church-state scale is summarized into a three-fold typology: countries with full establishment (such as the Scandinavian

countries), countries with partial establishment (such as Germany but also Italy and Great Britain), and countries with a clear separation of church and state (such as the US and France.

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The distributions summarized in Table 4 show that in contrast to the relevance of church-state relations for immigration policies⁶⁴ and contrary to the argument in Fetzer and Soper (2005)⁶⁵ there is hardly any overall effect of this particular institutional arrangement on the degree of cultural integration policies. Rather, there seems to be a polarization, with only the U.S. taking a middle position. *Per se*, a separationist regime does not lead to a low recognition of cultural group rights. On the basis of the data in this table, however, one can detect such an effect in combination with Catholicism. Among Protestant countries, there appears to be an effect in the opposite direction, with Sweden as a prominent outlier. Based on Table 4, I offer the general argument that religious and cultural groups (in particular Muslims) enjoy greater rights in those Protestant countries where there is a clear separation of church and state. Protestant countries where church-state relations are less distinct are less accepting of such cultural group differences. That is, Fetzer and Soper's conclusion about the non-accommodating effects of separationist church-state regimes hold only for France, and possibly Ireland, but cannot be generalized. Moreover, as has been shown elsewhere,⁶⁶ one has to distinguish the type of Muslim group organizations when analyzing the effects of state-church relations: in Europe: Until 1989, European states have dealt with groups which they considered representatives of an "official Islam" but beginning in the 1990s, the focus has shifted to "political Islam" (Laurence, in this volume).

Political parties, regime patterns and integration policies

The last step in the analysis of the variation in integration policies concerns the role of religiously oriented parties correlating to the type of democracy. Analogous to the studies of strong left-wing parties and generous welfare states, one might expect a relationship between

the presence of these parties and a restrictive output in integration policies. Moreover, while the class cleavage has undergone a steady decline in significance, the religious cleavage in terms of the relationship between religiosity (as measured by church attendance; see above) and left-right voting behavior has stayed rather stable. In the U.S., there was even a slight but steady increase of religious voting attributable to the growing mobilization efforts of the New Christian Right.⁶⁷

In order to derive a measure that captures a broad Christian partisan impact instead of a merely Catholic partisan impact, the countries are classified according to the role of religion in the identity and program of particular parties and their relationship to religious groups; the salience of the religious cleavage in voting behavior; and the length of these parties' participation in national governments.⁶⁸ The resulting 6-point-scale is summarized in three categories, ranging from a low to medium to high religious impact.

Table 5 depicts an interesting role that these parties play. It confirms what has been shown with regard to other social policies. A strong Christian Democracy corresponds not just with a moderate abortion ruling and family policies⁶⁹ but also with moderate integration policies. It thus reflects a particular policy profile of Christian Democracy in association with a larger and distinct vision of society.⁷⁰ This effect, while disappearing with regard to the relative openness of immigration policies, i.e. the question of how to control access to the country,⁷¹ is clearly reinforced with regard to the accommodation of non-Christian minorities, with only the Netherlands straying from the “centrist” Christian-Democratic group.

Table 5: Party Effects: Religious Partisan Impact, and Religiosity and Cultural Integration

	Recognition of Group Rights		
	<i>Low</i>	<i>Moderate</i>	<i>High</i>
<i>Low religious partisan impact</i>	<i>France</i>		Canada Australia New Zealand

Table 5: Party Effects: Religious Partisan Impact, and Religiosity and Cultural Integration

<i>Medium religious partisan impact</i>	Ireland Portugal Switzerland	Spain United States Great Britain	 <i>Sweden</i>
<i>High religious partisan impact</i>		<u>Italy</u> <u>Austria</u> <u>Germany</u> <u>Belgium</u> <i>Denmark</i> <i>Finland</i> <i>Norway</i>	<u>The Netherlands</u>

Note: Countries in **bold** are those with a **high level of religiosity**; countries in *italics* are those with a *low religiosity*. Countries that are underlined are those with strong Christian Democratic elements in the party system.

Overall, however, a comparison of Tables 4 and 5 suggests that religious partisan effects are less significant than those of religious legacies.

The final issue I address is the role of the political system as a whole. One of the most influential lines of argument explaining divergence in policy output focuses on type of democracy. A prominent model is Arend Lijphart’s distinction between majoritarian and consensual democracies, distinguished by the degree to which political power is centralized and uninhibited by checks and balances.⁷² In majoritarian democracies, the parliamentary majority and the executive which emerges from it, encounter few constraints on their exercise of power. In consensus democracies, on the other hand, the power of the executive is mediated by a variety of other institutions such as an independent parliament, coalition building among parties, federalism, and independent judiciary. Lijphart summarizes these factors along two dimensions. The first is the party-executive dimension which concerns mostly the relationship between political parties, the executive, and parliament. The second is the federalism-unitarism dimension which is rather independent from the former and constituted by factors such as a strong or weak judiciary, bicameralism vs. one parliamentary chamber, and a federalist rather than a unitary state. Lijphart’s classification of countries

diverges somewhat from the one applied here, however, because he decides to drop the federalism dimension and uses only the party-executive dimension to group the countries. However, I in effect, take his classification more seriously than he does. I classify only those countries as consensus democracies, which have positive values in both dimensions, and only those countries as majoritarian, which have negative values in both dimensions. All other countries are classified as mixed forms here.

Table 6: Cultural Integration, Type of Democracy, and Religiosity

	Recognition of Group Rights		
	<i>Low</i>	<i>Moderate</i>	<i>High</i>
<i>Majoritarian Democracies</i>	France Ireland	Great Britain	New Zealand
<i>Mixed Types</i>	Portugal	<i>Denmark</i> <i>Finland</i> <i>Norway</i> Italy Spain United States	<i>Sweden</i> Australia Canada
<i>Consensus Democracies</i>	Switzerland	<u>Austria</u> <u>Germany</u> <u>Belgium</u>	<u>The Netherlands</u>

Note: Countries in **bold** are those with a **high level of religiosity**; countries in *italics* are those with a *low levels*. Countries that are underlined are those with strong Christian Democratic elements in the party system

Lijphart argues that the character of democracies matter significantly for policy output and that consensus democracies are largely more inclusive and more adequately represent minority interests than majoritarian democracies. Does this translate into a more inclusive integration policy? The summary in Table 6 casts some doubt on this proposition. It seems that there is no relationship at all between type of democracy and the level of acceptance of cultural group rights. While Lijphart demonstrated some relationship between consensus democracy and the responsiveness to minorities' and women's concerns, this does not extend

into the realm of multicultural politics. Here the combination of party politics and confessional legacies, i.e. a “Catholic cultural effect” in the sense of F. Castles seems the most important factor.

Trends after 9/11: Convergence or divergence in light of cultural legacies

In the 1980s, Tomas Hammar observed that the politics of multiculturalism seemed to diverge more among the 19 democracies than did the immigration policies.⁷³ The current post-9/11 debates about headscarves, the securitization of immigration and immigrant policies and other examples indicate some convergence in Europe. Some authors argue that even prior to 9/11, there has been a trend of convergence in European countries with regard to control of immigration and conceptions of citizenship.⁷⁴ However, assessments regarding convergence depend on the measurement and interpretation of magnitudes and directions. Evaluating their results for the five West European countries in their study based on the three data points of 1980, 1990 and 2002, Koopmans et al. claimed that there was “convergence in the sense that all five countries have – to smaller or greater extents – moved in the same direction. All countries – with the exception of the United Kingdom, which was already close to the civic pole – have shifted toward a more civic-territorial conception of citizenship, although the ranges have been quite marginal in the case of Switzerland. Similarly, all countries have moved away from the assimilationist pole toward a stronger recognition of cultural rights and differences. Again, the strength of this trend varies greatly among the countries; it is weak in France, and even more so in Switzerland”.⁷⁵ This finding is even less uniform in the expanded sample of this paper: some countries like Belgium and Italy have not experienced any significant shifts while Australia has reversed some of its multicultural approaches.⁷⁶

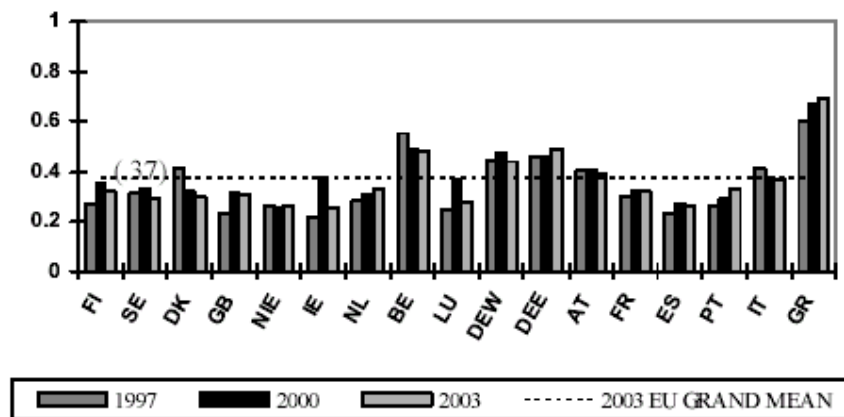
However, viewed in terms of the range of variation between countries, there is no real apparent convergence. Instead, some signs of divergence can be observed with the Netherlands, Britain, Sweden and even Denmark (until recently) following the path of

multiculturalism and Belgium, France and Switzerland making only very modest progress. A particular shift occurred in Portugal. Despite the provisions of religious freedom and state neutrality enshrined in the 1976 constitution, non-Catholic minorities hardly had any group rights until the very end of the 20th century. This changed only and rather abruptly with the passing of the new law on religious freedom which took five years of preparation and was passed in the summer of 2001.⁷⁷ Hence, by the beginning of the new millennium the differences between cultural monist and cultural pluralist approaches to integration of immigrants were more pronounced than at the end of the Cold War.⁷⁸ So, did any of this change after 9/11 and if so, to what extent are these changes shaped by a country's religious legacies?

Koopmans et al. (2005) themselves claim that there has been a reversal in the trend towards differential citizenship in the wake of 9/11.⁷⁹ Their data however, which covers only the period up to 2002 does not provide empirical evidence for such a general claim. In fact, where such reversals can be substantiated, as in the case of Australia, they were initiated prior to 9/11 and can be explained by the rise of a religiously oriented conservative government. Notably, Australia's integration policies are still more pluralist than the average.⁸⁰ The slow implementation of the new Portuguese law on religious freedom after 2001 can be attributed in part to the effects of 9/11 but it was nonetheless fully completed by 2003 – despite 9/11 and a modest increase in the Portuguese resistance to multiculturalism (see Figure 1 below). Furthermore in France, the modesty of changes and the slowdown of reforms after 2002 may have more to do with the hegemonic political tradition of Republicanism and the interplay between the *Front National* and the dominant political forces than with the effects of 9/11.⁸¹ The paper in this volume by Martin Schain underscores that point.⁸² His findings suggest that there is less change in Europe than generally assumed: that convergence between the United States and Europe occurred mostly in the area of security measures such as surveillance and related actions directed against immigrant populations.

Moreover, there are discrepancies between Western public opinion and government policies. On the one hand, survey data demonstrate a weakening public support for policies based on cultural pluralism. In an analysis of public support for Islam in schools in three West European countries, Fetzer and Soper, for example show that after 9/11 there was a decline in all three cases for state funding of Islamic schools (Britain), for providing Islamic instruction in public schools (Germany) or for allowing the hijab in public schools (France).⁸³ This shift, they argue however, is not mirrored at the level of elites –nor, one could postulate, in public policies: “the Islam-related attitudes of European elites ... are much more constrained by their country’s particular church-state arrangement than are the views of ordinary citizens.”⁸⁴ On the other hand, a survey analysis of the European Monitor Centre on Racism and Xenophobia shows that with the exception of Greece, resistance to multicultural society did not increase in EU member states between 2000 and 2003. Rather it decreased in many countries during that period.⁸⁵ The levels were particularly low in the Nordic countries where, apparently, the Protestant legacies described above constrain such reversals. A modestly increasing resistance to multicultural policies could be observed in the Mediterranean countries and in those with high levels of, and long association with, multiculturalism (GB, NL).

Figure 1: Resistance to Multicultural Society in the EU-15 (Longitudinal changes per Country)



Source: EUMC 2003, p. 42.

In a similar vein, the reactions to the London bomb attacks of July 2005 and their impact on Muslim communities in the EU triggered new or reinforced existing initiatives by the government to reach out to the Muslim community rather than in a reversal of such policies.⁸⁶ This was not a European specialty. In July 2005, several Mosques were attacked in New Zealand but the government expanded its outreach program. These outreach efforts clash however, with the growing securitization of immigration policies, and affect civil liberties for both citizens and migrants alike.⁸⁷

Conclusions

This paper has addressed the question of how the growing complexity and cultural diversity of Western countries in the face of new immigration waves affects the functioning of democracies, and in particular, the politics of multiculturalism. The paper showed a considerable diversity in such policies in the West, not just between the “settler countries” and the European countries but also within these categories. It also demonstrated that a modified “families of nations” concept⁸⁸ may be a better frame of analysis than standard models of explanation. This concept should adjust for the interplay of nation-building, religious traditions, and institutional management of cultural diversity. It also needs to pay attention to the role of parties, in particular the policy characteristics of Christian Democracy.⁸⁹

Moreover, the analysis suggests that the cultural integration of non-citizens does not neatly correspond with the openness of immigration policies. In a similar vein, the degree of social integration of “guest workers” in Germany clearly exceeds that of labour migrants in France.⁹⁰ The paper was a step towards more comparative research regarding group recognition and civil liberties of religious minorities, in particular the large and growing group of Muslims.⁹¹ It showed that cultural legacies such as Christian denominations, in combination with more political factors such as the role of religious parties play an important

role in shaping a country's readiness to accommodate non-Christian immigrant groups. The effects of 9/11 could so far only be demonstrated at the level of mass public rather than public policies.

Appendix. A Scale of Cultural Group Rights in 19 democracies (1990/2002)

Cultural group rights as defined by Koopmans et al. (2005):

Allowances for religious practices outside of public institutions

- ritual slaughtering according to Islamic rite,
- Islamic call to prayer,
- provision for Muslim burials)

Cultural rights and provisions in public institutions

- state recognition and funding of Islamic schools;
- Islamic religious classes in state schools;
- The right of female teachers to wear the Islamic headscarf;
- Programs in immigrant languages in public broadcasting;
- Islamic religious programs in public broadcasting

	Religious Rights		Cultural Rights		Average RR and CR		
	1990	2002	1990	2002	1990	2002	1990/2002
A	-0.66	0.33	0.50	1.00	-0.08	0.67	0.29
AUS	0.50	0.50	0.20	0.40	0.50	0.30	0.40
B	0.00	0.00	-0.20	-0.20	-0.10	-0.10	-0.10
CH	-1.00	-0.66	-0.80	-0.60	-0.90	-0.63	-0.76
CND	n.d.	1.00	n.d.	0.40	n.d.	0.70	0.77
D	-0.33	0.00	-0.60	0.00	-0.47	0.00	-0.24
DK	0.00	0.00	0.00	0.66	0.00	0.33	0.17
F	-0.33	0.00	-0.60	-0.60	-0.47	-0.30	-0.39
FIN	n.d.	0.33	n.d.	-0.20	n.d.	0.13	0.13
GB	0.33	0.33	0.00	0.20	0.17	0.27	0.22
I	0.00	0.00	-0.33	-0.33	-0.17	-0.17	-0.17
IRE	0.00	0.33	-1.00	-0.60	-0.50	-0.27	-0.39
N	n.d.	0.33	n.d.	-0.40	n.d.	-0.03	-0.03
NL	0.66	1.00	0.60	0.80	0.63	0.90	0.77
NZ	1.00	1.00	0.00	0.60	0.50	0.80	0.67
P	-1.00	0.66	-1.00	-0.20	-1.00	0.23	-0.39
SP	n.d.	0.33	n.d.	0.00	n.d.	0.17	0.17
SW	n.d.	0.66	0.33	0.50	0.33	0.58	0.45
USA	n.d.	1.00	n.d.	-0.40	n.d.	0.30	0.30

Sources: Anderson (2003), Ansari/Karim (2004); Buckley (1997); El Battiui/Nahavandi/Kanmaz (2004); Lopez Garcia/Planet Contreras (2002); Koopmans et al. (2005), Madeley/Enyedi (2003), Monsma/Soper (1997), Richardson (2004); Plesner (2001); <http://euro-islam.info.html>; own research and communication with country experts.

Summary Scores: A Scale of Cultural Integration – Religious and Cultural Group Rights in Western Democracies (average for period 1990-2002)

<i>-1.00 – -0.34</i>	<i>-0.33 – +0.33</i>	<i>+0.34 – +1.00</i>
CH	A	AUS
F	B	CND
IRE	D	NL
P	DK	NZ
	GB	SW
	FIN	
	I	
	N	
	SP	
	USA	

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