THE POLITICS OF RECOGNIZING RELIGIOUS DIVERSITY IN EUROPE.
SOCIAL REACTIONS TO THE INSTITUTIONALIZATION OF ISLAM IN THE NETHERLANDS, BELGIUM AND GREAT BRITAIN

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Introduction

Immigration from North Africa, Asia and elsewhere has meant a massive influx of Islam into Western Europe. Rough estimates suggest that today five to six million Muslims live in Europe.[1] At first Islam led a rather 'concealed' existence, but it has gradually developed into an important mobilizing power among immigrants in Europe. Muslims have pressed for the establishment of institutions to enable them to practise their religion. They have organized in many ways, and established institutions varying from mosques, halâl butchers, schools, broadcasting organizations, and political parties right through to cemeteries, and have worked for the appointment of Islamic spiritual advisers in hospitals, prisons, the armed forces and the like. Slowly but surely the outlines of Islamic 'communities', assuming that such things exist, have begun to emerge throughout Western Europe.

When the followers of a religion settle in a new society and try to build up their religious institutions there, they can do so within the confines of their own community, and in certain cases 'underground' if necessary. In that event, the institutions built up by the group have a limited range and validity, i.e. only within their own group or a part of it. These institutions are not officially recognized by the society; they are not taken in, accepted, and incorporated into the institutions of the society as a whole. This might be because the society has objections to certain institutions, but this is not necessarily the case. The point is that these forms of institutionalization operate in the private sector, and there is no direct incentive on the part of the followers of the religion or of the society to initiate arrangements in the public sector or undertake other kinds of action.

Adherents to a given religion can also choose or be obliged to strive for the recognition of their institutions within the society. This ambition can be inspired by the principle of equality, or by a desire to be treated the same ways as other religions which are indeed accepted by the society. It can also be based

on material considerations: recognition can mean the right to public funding. It is also possible that the established powers such as the government might require that they run their institutions in a particular way, in accordance with what is considered acceptable and desirable in the host country. If Muslims want to build a mosque, for instance, they are confronted with fire and safety regulations, traffic regulations and local development plans. If they want to bring in an *imam*, a spiritual leader from abroad, they come up against the laws governing residence and work permits. Whether or not they have taken the initiative, and whether they wish to or not, they have to interact with the society to achieve recognition for their institutions. A more *public institutionalization* may result, and its form can vary. The society may have certain guidelines for the recognition of Islamic institutions, and can in some cases even rule against them. The outcome of the process depends on the institutional context of the society in question: some institutions seem to fit in relatively easily, perhaps because other groups or religious communities have comparable ones, and others seem to be more difficult to place, possibly because they call for new rules or decisions.

One way the development of Islamic religious communities outside their core areas can be understood is by referring to Islam itself. Islam is then regarded as a normative system, a set of norms and values guiding everyday life. According to this approach, Muslims in the Islamic world or outside it constantly strive to live their lives in accordance with this normative system because that is the nature of Islam. Thus it is hardly surprising that adherents to this point of view are primarily concerned with the formal aspects of religion.

There are nevertheless a number of arguments refuting this point of view, which is deterministic and static. We prefer an approach that proceeds from the interaction between Islamic immigrants and the society around them (Rath, Groenendijk & Penninx 1992; see also Sunier 1996). Practising Muslims do not shape the development of Islamic religious communities in isolation. The society surrounding them also influences the process. The final form that Islam with all its variants assumes can be viewed as the result of consultations and conflicts among any number of parties involved. Many factors play a role in this interaction, including some that in themselves have little to do with Islam.

The scope given to Muslims to practise their own religion then becomes the product of political decisions in past or present concerning the recognition of religious institutions (in general). Various institutions play a role in these decisions. To start with there are laws and regulations. Claims for facilities or other Muslim initiatives are met within the legal framework of laws and regulations. However, these same laws and regulations influence in turn the formulation of these claims or the development of these initiatives by Muslims. In this process a central role is played by government, whose attitude and actions are bound by the existing legislation, and which is obliged in principle to honour initiatives

and claims from new groups to the extent that they comply with the law. But government actions are not purely legalistic, and the scope for negotiations in applying the various rules can vary. Moreover, the position of the government is by no means fixed, and its attitude can vary in the course of time, sometimes as a result of outside pressures or as a consequence of disputes within and between departments or between national and local authorities. Finally, any number of private individuals and organizations, such as political parties, trade unions, resident groups, businesses, experts, the media or organizations such as animal protection societies, might feel called upon to have a say or play a role in the emergence of Islamic institutions. Here it seems appropriate to distinguish between institutions based on religious or non-religious principles, for they are likely to have fundamentally different interests with respect to the formation of Islamic institutions. Together they influence the continuation or amendment of legislation, and the government actions.

To properly understand how the process of institutionalization develops, it is not enough to simply provide an essentially technical description of political decision-making. Insight is also needed into the prevailing ideological assumptions about the place of Muslims in society, and the relationships between these assumptions and the process of political decision-making, in particular the extent to which some people are primarily seen as Muslims, or the extent to which people are prepared to see Muslims as members of the 'imagined community' every nation forms, and the consequences to be drawn. The relation between political decision-making and these ideological assumptions can be explained as follows: the ideological assumptions legitimate a particular course of events, for instance in the sense that Muslims are rightly or wrongly allocated a facility or scope to set up an institution of their own, and these assumptions affect life in society and act as guidelines in social interaction. By means of this influence on political decision-making, these ideological assumptions influence how goods and services are distributed within the confines of the nation state. One of the reasons why is that these decisions can result in a policy or legal regime where the place of religious institutions is implicitly or explicitly regulated. In historical terms, this policy or regime is the product of a series of political decisions, and reflects the specific developments within a nation state. Indeed, a legal regime that has grown historically in this way can go in its own direction. It can influence particular ways of acting and thinking. In practice it structures new political and ideological processes, since the local and immigrant communities alike model their requests and desires on what is or is not feasible within the law. We do not claim that laws and regulations determine the course of political and ideological processes; on the contrary, legislation is never unequivocal and leaves scope for various interpretations. Moreover, if individuals or groups cannot identify with the legislation, or with some part of it, or with its application, they can turn to political mobilization to achieve fun-

damental changes in the law, or to guide its application in a specific direction.

In theory most European societies are secular nation states, though in some countries, such as Denmark or Great Britain, there is an established or national church. In the other countries, church and state are strictly separate, at least in theory, though in practice the dividing lines are sometimes blurred. Without exception we find social formations which are permeated in religious or ideological respects with Christian or Humanist elements. Whether it is a matter of legislation stipulating the Christian or Humanist ethic or of more public matters such as official holidays, in nation states these issues are at least informed in part by Christianity or by a specific denomination within it. Furthermore, in spite of the separation of church and state, the authorities in many of these nation states provide certain facilities for the established religious communities in the strictly religious field and in the public or semi-public fields of education, social services, and the like. The presence of people with a non-Christian faith puts this historically determined orientation to the test.

In practice the question of the recognition of Islam and its institutions is a recurrent one and the host societies' responses have rarely proved to be unambivalent. The establishment of places of worship is sometimes supported, and sometimes opposed by local residents or authorities. Muslim women at work or Muslim girls at school wearing headscarves has led to problems, with widely varying results in different countries. The introduction of Islamic primary schools has provoked public debate about their desirability, and the outcome of these debates has been very diverse. The application of Muslim dietary laws, particularly as regards ritual slaughter, has met the same fate.

Very little research has focused on precisely how a society reacts, what barriers it throws up or even removes as regards the rise of Islamic institutions, and the explanation of these reactions. Social scientists have devoted relatively little attention to the religious aspect of immigration and its social significance. They have seen immigrants primarily as 'foreign workers', 'migrant labour', 'blacks', or 'ethnic minorities', depending upon the specific approach in the country concerned. And what little research has been conducted is mainly focused on Muslims, the development of their identity, the formation of their organizations, and other matters relevant to the 'internal' culture or structure of their religious communities.

In this article we examine the extent to which there has been a build-up in Western Europe of Islamic institutions recognized by society, whether new or established ones, the spheres of life where they emerged, and how extensive and wide-ranging they are. We distinguish seven areas where the process of institutionalization can take place. In random order, they are the fields of religion, law (especially family law), education, the socio-economic and socio-cultural areas, health care and social services, and politics. We then list and analyse the established institutions and agents that have played a role in these process-

es, the political and ideological positions they have adopted in response to the wishes of Muslims, and how these positions have been maintained in relation to each other. We have expressly concentrated on how society has created opportunities or impeded the development of these institutions. This article is not so much about Muslims or about the mobilization of Islam, nor is it about any other localized process within Islamic communities. It is about the European societies themselves, their characteristics, and their potentials.

We have investigated the reactions to the institutionalization of Islam in the Netherlands, and compared them with the situation in Belgium and Great Britain.

Extent and scope of the institutions

The situation in the Netherlands is an interesting one, because it is a country that has known religious diversity for centuries. Before the Second World War and in the 1950s, the forces of 'pillarization' produced a society where religion and ideology were among the central social determinants, and where the people organized themselves accordingly (see e.g. Lijphart 1975; Van Schendelen 1984). The social groupings based on religion or a philosophy of life served as 'pillars' and constituted more or less closed communities, shaping every aspect of social life from the cradle to the grave. Each pillar had its own institutions, including hospitals, daily and weekly newspapers, broadcasting networks, schools, universities, housing associations, trade unions, small business associations, political parties, and even athletic clubs and choirs. There was virtually no interaction between the pillars except at the top, where inter-pillar accommodation was arranged and where the political leaders were in close consultation, settled imminent conflicts and protected their own interests. In the developing welfare state, pillarized organizations played an influential role in the formulation and implementation of government policy, especially in the allocation of social goods and services, which justified their existence. This state of affairs was embedded in social and political practice, and in legislation. Although the counter-forces of 'depillarization' were present during the development of this pillarized system, they only exerted a limited amount of influence. It was not until the 1960s, with the churches' loss of influence and the growth of secularization, that the pillarized organizations lost their dominant position and that their 'natural' involvement with policy receded. Legislation was amended accordingly on a number of points, and the 1983 revision of the constitution was a provisional milestone. The new constitution terminated a number of government commitments, particularly financial ones, to the churches, and the separation of church and state entered a new phase. Matters no longer mainly revolved around religious or ideological collectives, but focused instead on the individual.

Although the advancement of Islam and the decline of pillarization were more or less simultaneous, in a sense they pulled in opposite directions. To be sure, the Muslim timing was unfortunate. They settled in the Netherlands 'too late', at least too late to take advantage of the pillarized structure. But the fact remains that the pillarized system is far from completely dismantled, if in fact that can ever entirely be the case. Many of the social, political, and legal practices and structures are still wholly or partly intact. In this particular arena, to what extent have Muslims demanded and obtained opportunities to shape their identity and institutions according to their own agenda?

Today it is clear that Muslims have established a large number of institutions. Some of our findings are given here. So far Muslims have mainly been active in the area of religion. Almost immediately after their arrival in the Netherlands, they sought premises for collective prayer, and established places of worship. At first they were unofficial (in residential or business sites), but foundations or associations were gradually set up to provide 'real' mosques. By now there are almost 400 places of worship or mosques in the Netherlands, though many organizations are still facing accommodation problems.

There was very little political movement at first: contacts between Islamic organizations and the government were limited to practical problems, such as ritual slaughter, or establishing and financing places of worship. This began to change in the course of the 1980s. Contacts became less incidental and informal, particularly after Islamic organizations in some municipalities and at the national level were included in advisory bodies set up by the government to implement the minorities policy. In due course, individual Muslims also participated more intensively in regular organizations such as political parties, though it was not always immediately clear whether they were doing so as Muslims or in some other capacity. Separate Islamic parties or trade unions did not appear to be viable. In some places, and at the national level, federal leagues of Islamic associations and foundations were set up to represent their constituents in discussions with the government on specific policy matters.

Almost all the local Islamic organizations have been providing Koran classes for years, but there was no real breakthrough in the field of education until the 1980s. That is when the first Islamic broadcasting network was launched, when training courses were arranged for imams, and the first Islamic primary schools were opened. By the late 1990s, there were more than thirty Islamic schools (fully funded by the government and with a regular Dutch curriculum), an Islamic school board organization, and an Islamic pedagogic centre. Steps have been taken in various municipalities to provide Islamic religious instruction at state primary schools, although these efforts were only successful on a very limited scale. Nor has an imam training course, recognized by the Dutch education system, ever got off the ground, though there are some private courses (Landman 1997).

In the field of law, in the socio-economic and socio-cultural field, and in the field of social welfare, very little has happened. To a limited extent, there has been some recognition of Islamic law in international private law, particularly family law. The Dutch only recognize certain parts of Islamic family law in so far as they are part of the national law of the country of origin and do not conflict with Dutch law. There are also Islamic butchers, mosques run teahouses and shops, and there is an Islamic architectural office, all on a limited scale.

In summary, generally the formation of Islamic institutions has been *a rather selective process*. A great deal has happened, but at the same time a great deal has not. In view of the ideal-typical model of Dutch pillarization, Islamic daily and weekly papers might have been expected, and Islamic secondary and special schools, maternity clinics, hospitals, care homes, swimming clubs, trade unions, pressure groups, housing associations, political parties, emigration foundations and so on and so forth, but in practice none of them are in evidence. Contrary to what some spokesmen are keen to claim, in terms of institutional arrangements, there is no question of an Islamic pillar in the Netherlands, or at least one that is in any way comparable to the Roman Catholic or Protestant pillars in the past.

It will hardly come as a surprise that Islamic institutions have been the result of Muslim efforts. Yet they cannot take all the credit. The establishment of the co-ordinating organization SPIOR in Rotterdam, or the organization of Islamic schools boards, are partly the result of the involvement of third parties. The fact that Muslims have often taken the initiative should not lead to the assumption that, like architects, they have been able to design the Islamic institutional landscape entirely according to their own agenda. In any case, not all the efforts have produced the intended results. There is still no government-funded training course for imams in the Netherlands, and state primary schools only provide a few shreds of Islamic religious instruction. In addition, Dutch society has played a major role in the formation of these institutions, and has exercised a guiding influence.

Very few claims have been categorically rejected. Typical exceptions are polygamy and female circumcision, in so far as Muslims have advanced these claims at all (which is extremely rarely the case). However, it has only been in exceptional cases that the surrounding society chose to recognize Islamic institutions as a matter of course and unconditionally. Usually there were obstacles, and in most cases recognition has only been achieved after lengthy pleading. All these efforts mean that in the long run, Muslims have achieved most of what they set out to achieve.

In the discussions on Islamic institutions, repeated references have been made to the interference of foreign powers and international Islamic organizations. But in the diaspora round the North Sea, this intervention, for instance the complete or partial funding of places of worship, or the training and recruitment of

imams, has remained limited. Funding was occasionally provided by Saudi Arabia or Libya, and more often by Turkey through the Presidium for Religious Affairs (the *Diyanet*). The intervention was however not as frequent as has been assumed; more striking perhaps was the *fear* of interference. Dutch protagonists have opposed certain institutions on these grounds, such as the Member of Parliament who tried to prevent the introduction of Islamic schools. Driven by their fear of foreign involvement, others were all the more motivated to support local Muslim initiatives. By supporting organizations in the Netherlands or drawing up their own plans to introduce a Dutch course for imams, the Dutch might pre-empt the foreign powers or organizations. In fact policy-makers were sometimes strikingly inconsistent in this respect. Partly for fear of fundamentalist influences from abroad, the Rotterdam Council decided to subsidize Islamic organizations, whereas a few years earlier it had cordially invited fundamentalist Saudi Arabia to fund a mosque. Organizations linked to the Turkish *Diyanet* also meet with sympathy, since they might adhere to a more liberal type of Islam than other organizations.

The key to the process of recognition usually lies with the national and local government. However, this role is by no means played out unequivocally or consistently. At times the government can actively encourage the formation of Islamic institutions, while at others it can adopt a neutral, legalistic point of view, delay the opening of institutions, or make it impossible. Time and again the term 'government' has turned out to be misleading, since different departments adopt different attitudes. There are differences in what people find desirable: one department at the Ministry of Culture and Welfare was reasonably co-operative about subsidizing Islamic places of worship, while another adopted a very negative attitude towards an Islamic broadcasting network. In part this results from their having different interests, powers, and regular contacts, and in part because of disparities in the political or legal context. Often it is a question of differences between individuals; some officials interpret the rules by the letter, and others are more flexible. For a long time the Rotterdam Council adhered to a rather ambivalent policy on mosques, since the two departments involved (the Migrants Office and the Secretariat for Urban Redevelopment) could not see eye to eye. Flexibility in applying the rules varied for each department, individual and subject.

One category of government officials is very emphatically involved with Muslims, i.e. the ones whose departments are responsible for developing and implementing the minorities policy. The aim of this policy is to integrate the categories of immigrants referred to as 'ethnic minorities'. This classification is based on actual or supposed socio-economic or ethno-cultural features and not on religious ones. From the early 1980s, these officials have found a place in the minorities policy for most of the interests of Muslims. They have been supported in this by the official statements in the 1983 Minorities Memorandum

(*Minderhedennota*), since most Muslims are members of ethnic minorities. These same officials are far less enthusiastic when it comes to the formation of a single representative body for Muslims, or new regulations they feel affect the separation of church and state. Aside from exceptional cases such as Utrecht, where Islamic organizations were excluded in principle from the consultation arrangements for ethnic minorities, the minorities policy nevertheless appears to have served as a catalyst for the recognition of Islam. However, Islamic institutionalization is being steered in a specific direction to serve the purposes of the minorities policy.

Differences between municipalities are very obvious. In Rotterdam, Islamic organizations receive municipal subsidies for certain activities and are recognized as partners in the political debate. In addition, the Council has officially and 'with sound Rotterdam common sense' helped found Islamic primary schools and also provides accommodations and financial support for Islamic religious instruction at state primary schools. There was no question of any of this in Utrecht in the period covered by this research. There Islamic organizations are neither funded nor recognized as partners in the administrative process. A wide range of legal means were used — though ultimately in vain — to keep an Islamic school from opening, and the possibility of Muslims approaching the Municipal Council to facilitate Islamic religious instruction was subverted in advance. That these two local authorities should adopt such different attitudes is not in itself surprising. All they did was act within their powers. In Dutch constitutional law, certain powers are delegated to local authorities to enable them to control local circumstances. However, the decisions are sometimes difficult for the Muslims concerned to accept, especially since the reasoning behind them is not always clear or convincing. From their point of view, the demand for a unified regime is entirely justified. There are, however, indications — nothing spectacular, but discernible even so — that in the mid-1990s the Utrecht Council changed its negative attitude into a more accommodating one.

Officials and politicians alike want Muslims organized in the fashion that is viewed as acceptable and efficient in the Netherlands, i.e. with representative organizations or in co-ordinating bodies with approachable spokesmen, as if the Muslims in the Netherlands constitute a coherent community.[2] Administrators thus hope to avoid bickering, or having to deal with an amorphous mass with constantly changing leaders. At the same time they want to enhance the legitimacy of their own political actions. In the knowledge that Muslims have no proper representation, or can only achieve it with great difficulty, this principle is sometimes flexibly applied. That was the case with regulating ritual slaughter, training people who perform circumcisions, and providing access for imams to prisons. But at other times it was regarded as a non-negotiable condition, as in regulations on the access of imams to the armed forces and the allocation of

broadcasting time to the Islamic broadcasting network. In these cases the representativeness requirement served as an obstacle, as was sometimes the intention.

Reactions to the development of Islamic institutions might seem to be largely determined within a 'religious' political or administrative context, and to be directly concerned with religion, in this instance Islam. This is not, however, the case. Multifarious *general policy considerations*, which have nothing to do with the influx of Muslims, sometimes play a crucial role. In itself the revision of the Constitution in 1983, to quote a major example, had little to do with Islam or its followers, though its consequences for them were certainly important. The privileges that had been granted to churches up till then (including free postage and exemption from taxes) were abolished with the stroke of a pen. Paradoxically, the revision also created new opportunities for Muslims. The government had to revise the arrangements with the churches about religious services for the armed forces, or the ringing of church bells, and Muslims were recognized as participants in the discussion on these matters. In the end, this was to the advantage of Muslims in the sense that they were granted certain privileges without too many problems. Other general policy considerations involved the decentralization of welfare policy, urban renewal in innercity areas, economies of scale in education and—last but not least—the ethnic minorities policy. On the face of it, these policies were not directly concerned with Islam—in the minorities policy the target group is by no means identical to the category of Muslims, although there is some overlap—but they certainly helped create room for Islamic institutions. In the first years of the national minorities policy, as formulated in the 1983 Minorities Memorandum, the idea took root that Islamic organizations were essential debate partners for the government. This led to the recognition of these organizations and to a greater sensitivity to claims by Muslims. Similar processes can sometimes be observed at the local level, for instance in Rotterdam (cf. Feirabend & Rath 1996).

Political and ideological positions

We now know something of the reactions to the institutionalization of Islam. To understand the underlying reasons for these reactions, we should also examine the political interests, ideological assumptions and aims of the partners involved. It is common knowledge that individual Muslims (like anyone else who lives in the Netherlands, and the adherents of other religions or ideologies) can make official claims to all kinds of rights and provisions. However, opinions differ widely as to the practical applications of these provisions. In particular, the collective pronouncements of Islam produce any number of conflicting reactions.

According to the prevailing opinion encountered in our research, Muslims have an excessive tendency to cling together and resist becoming a part of modern Dutch society. They are neither willing nor able to integrate into it, and have an irrational preference for traditional, i.e. non-democratic forms of political leadership. They do not treat women as equals to men, adhere to old-fashioned views on bringing up children, and are extremely susceptible to influence by international powers, particularly arch-conservative ones. In the Netherlands, they undermine the separation of church and state. In these views, Islam is a conglomeration of pre-modern and culturally alien elements. Whether or not there is any truth to this is irrelevant. These are widespread notions about Islam and its believers that can condition actions. They are also related to Dutch society itself, and its non-Islamic residents. The features attributed to them are a mirror image, as it were, of the features felt to characterize Muslims.

Take the separation of church and state. In a country where Sunday is observed as a day of rest, where the speech from the throne has always ended with a prayer, where oaths can be sworn on the Bible in parliament and courts of law, and the words *God zij met ons* (God be with us) are inscribed on the rim of coins, the separation of church and state has oddly enough acquired the status of canon law. There is the idea that non-Muslims respect this separation without exception, and that Muslims take no notice of it, and feel that it is fundamentally incompatible with their religion.

There is the widespread view that every effort needs to be made to prevent people who fail to accept such a highly regarded norm as the separation of church and state from being able to collectively represent themselves. Although in our research we have certainly encountered individuals who hold other views about Muslims or Islamic immigrants, and even regard Islam as a vehicle for emancipation, most people feel Muslims should not be given too many opportunities to construct their own positions of power. They are willing to enable Muslims to take part in political activities individually (of course within the existing political structures), but are horrified at the thought of Muslims organizing their own separate political parties. This they consider undesirable and harmful to society as a whole. The fear of the formation of an isolated Islam is matched by the efforts to create an Islam oriented towards Dutch society, organized according to the conditions of the system.

From an ideological point of view, Islam has thus had to develop under rather unfavourable conditions in the Netherlands. The fact that it has nonetheless been possible for a range of Islamic institutions to emerge and gain recognition can consequently be viewed as one of Allah's 'miracles', though its explanation should be sought at a more secular level. The fact that current legislation and regulations, political conventions and ethics do not permit inequality is a major factor. (In the heyday of pillarization it would have been the equivalent of swearing in church, a major assault on the pacification, of the various religious

groups.) This is why claims for equal treatment in political practice have given rise to fewer objections than claims for special treatment.

Take the case of Islamic religious instruction at state primary schools. For years Protestant and Humanist organizations in Rotterdam had taken advantage of the right to offer religious instruction, and received subsidies from the municipality for doing so. The Rotterdam City Council would have found itself in a very awkward position if it denied that right and funding to Islamic organizations. In Utrecht there was no such arrangement, and new provisions would have to be created for Muslims. Although they had a legal right to these provisions, the political barriers to their achieving it were apparently far higher.

In practice equal treatment often implies absorption into an existing routine. It is partly for this reason that the circumcision of boys could be recognized relatively easily, since doctors and insurance companies regarded it as an everyday medical intervention. Moreover, it had been practised for centuries by another religious minority, the Jews. Various rights and facilities were granted to Muslims because the principle of equality did not allow them to be treated differently than the Jewish community.

The principle of equality, we emphasize once again, carries great weight in Dutch society. If churches are allowed to ring their bells once a week, Members of Parliament noted at the time, then Muslims should be allowed to sound their call to prayer over the rooftops. This is a legal right that fell from heaven, as it were, into the Muslims' lap. This was truly equal treatment.

Yet this principle is not totally unproblematic. There is no clear rule about which individuals or groups Muslims should be on an equal footing with. Should they be treated the same as *Christian or Jewish religious* groups, or as the other *immigrant ethnic minorities*? There is a real difference. Religious groups have the legal right to found their own schools, which are then eligible for government funding. Ethnic minorities or groups of non-Dutch nationals are not recognized as religious groups, and the schools intended for them are not eligible for the same kind of funding. The fact that almost all the pupils at an Islamic school belong to ethnic minorities is irrelevant here, since schools are always intended for all the pupils of a given religious group, regardless of their origins or nationality. The Municipality of Utrecht tried to stop an Islamic school from being founded by using this argument. It was said to be a school intended for non-Dutch nationals. This argument was not accepted, since in various legal appeals it was repeatedly judged to be inapplicable to Islamic schools. Since then, the municipality has actually recognized an Islamic school.

The situation can also be viewed from the opposite angle. As religious organizations, Islamic organizations are not eligible for certain provisions available by virtue of the minorities policy, although as ethnic minorities organizations they would indeed be qualified. By regarding them primarily as self-organized groups, the Rotterdam City Council provided itself with a means of supporting

Islamic organizations, financially or otherwise. Their opponents, often secular organizations and their agents, stressed the religious if not the fundamentalist nature of Islamic organizations in an effort to prevent the municipality from supporting Muslims.

Another problem in the application of the principle of equality is timing. Should the principle be applied at the moment, or over time? At the moment there is no national arrangement for funding mosques, which is only fair since there is no arrangement of this kind for other churches either. However, some of the actors in our research felt that this was not justified because Muslims— unlike Christians—had not been able to take advantage of provisions such as the Church Building Subsidy Act, which expired in 1975. For them, some kind of arrangement for making up the arrears would seem justified.

It is clear that this lack of clarity sometimes offered Muslims unexpected opportunities, but also implied a great deal of uncertainty and arbitrariness.

International comparison

We compared the situation in the Netherlands with the ones in Belgium and Great Britain. In the first instance all three countries appear to have witnessed a similar development. In all three, the presence of Islam and its adherents went almost unnoticed for a long time. This gradually changed, and in the late 1980s and early 1990s their position in the community became a subject of heated general debate. Yet on closer examination, there are important differences.

Unlike the Low Countries, *Great Britain* has an established church with a privileged status. Its position is reflected in the status of canon law, the appointment procedures for holders of high ecclesiastical office, the organization of the church courts, and the representation of the church in the Upper House of Parliament (Commissie-Hirsch Ballin 1988: 168). Moreover, the head of state is also the head of the church. Other religious communities have a different, usually less privileged status. For the older Christian denominations and the Jews, there are special Acts of Parliament, and the other religions are merely free to operate within the confines of the law. However, the existing general legislation does not always take foreign religions such as Islam into account. Most legal provisions proceed implicitly from the Christian faith or Christian ethics, and hence sometimes prevent the free practice of their religion by Muslims. Muslims have received little support from the government and in some cases—such as the funding of Islamic schools—there has been actual opposition. There are several dozen Islamic schools, but only since recently have any of them been fully financed by the government. In the past funding applications were categorically rejected and the authorities even went so far as to ignore a judge's ruling in favour of an Islamic school. Nor is there Islamic religious instruction, and the existing religious education provided by the

authorities has a strong Christian bias. At first Muslims mainly made their presence felt on the local political scene. Only in the last few years have they directed their efforts more towards the central government, though these efforts have thus far been in vain.

In *Belgium*, a religion is recognized by passing a law. As soon as it goes into effect, the followers of a recognized religion have certain provisions made available to them. However, the way the Belgian government has tried to steer the development of Islam has produced various serious problems. This is why the formal recognition in 1974 is in essence still meaningless. The major obstacle in Belgium has been the absence of a nationally recognized representative body. The Belgian government allotted this position in 1975 to the Islamic and Cultural Centre (ICC), but it had no legal standing and proved to have no legitimacy in the eyes of the Islamic community. Since then there has been an impasse. One state-funded Islamic school has opened its doors in Belgium. In addition, Islamic religious instruction has been introduced on a wide scale in state schools, probably because religious instruction is a key ideological element in the Belgian educational arrangements.

In comparison with Great Britain and Belgium, things have not gone so badly for Muslims in the Netherlands. They have acquired the greatest scope for building up their religious infrastructure. In Belgium, despite more than twenty years of legal recognition, this scope remains restricted. In Great Britain the central government has repeatedly proved to be uncompromising and dismissive. The attitude of the Dutch government fluctuates from active support to procrastination. Provisions that might further the integration of Islamic immigrants into Dutch society can anticipate support, since the success of the minorities policy has priority. Apart from that, it is clear how divided the authorities are in all three countries: there are enormous differences between central and local authorities and between and within departments.

The international comparison demonstrates that up to a point, the content and form of institutionalization exhibits a specific 'national' pattern. This specificity results from differences in legislation (which in turn influence the claims of Muslims) and differences in political and ideological practice.

Towards religious diversity in Europe

Although the development of Islamic institutions is relatively far advanced in the Netherlands in comparison with other countries, it is far from being a 'European Mecca' for Muslims. Indeed, we should not overlook the fact that in the Netherlands as well, the predominant features of the local reactions are fear and unfamiliarity. The fear that existing traditions, arrangements and power positions or newly acquired liberties will be jeopardized decelerates the recognition of Islamic institutions. It is particularly the nature of the institutionaliza-

tion and the positive recognition of religious pluriformity established in legislation and regulation that distinguish the Netherlands from the other two countries: in part with the help of the minorities policy, Dutch society is steering towards an Islam oriented towards Dutch society, regardless of whether this course is supported by the Muslims themselves (which does not necessarily mean Dutch society will determine the future of Islam).

What is the social significance of this finding? In recent years, there have been fierce debates about the place of Islam in society. But if we review the institutionalization process, in fact these debates have come too late in the day. The national public debates did not take place until many institutions had already been established and recognized. In many cases, they are only indirectly relevant to what is actually happening, dominated as they are by abstract and ideological views, and because they tend to overlook how little power society has to oppose the establishment of Islamic institutions, even if it wanted to. The fact is that Muslims are only exercising common and hence universally valid constitutional rights—including freedom of religion and the principle of equality—which are rightly held to be of the highest importance in the Netherlands. Anyone questioning these rights encroaches on the foundations of their own society, and we have found very few supporters of such an extreme position. In this sense society is getting the kind of Islam it deserves.

NOTES

1. The data are anything but reliable, because in most countries no central registration of the inhabitants according to religion is kept, so the figures are based instead on the numbers of immigrants from countries where Islam is the most important religion. This gives us about 200,000 Muslims in Belgium, 2.5 million in France, between 0.55 and 1.5 million in Great Britain (Nielsen 1987: 25-34; Peach 1990), 1.7 million in West Germany (Thomä-Venske 1988: 78), and almost 628,000 in the Netherlands (CBS 1996: 53).
2. Nothing could be further from the truth. The term Islamic '(religious) community' is strictly speaking also inaccurate, and is better replaced by the plural form, '(religious) communities'.

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