

# IMMIGRANT POLICY FOR A MULTICULTURAL SOCIETY

A COMPARATIVE STUDY OF INTEGRATION,  
LANGUAGE AND RELIGIOUS POLICY  
IN FIVE WESTERN EUROPEAN COUNTRIES

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EDITOR



**IMES**

## THE MIGRATION POLICY GROUP

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## INTRODUCTION

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*Hans Vermeulen*

### 1.1 Foreword

This study was commissioned by the Temporary Scientific Commission for Minorities Policy (TWCM) in the Netherlands. In response to the trend study entitled *Migration, Minorities and Policy in the Future* (Pennix et al. 1995, in Dutch), the TWCM decided on a series of preliminary studies in more specific areas of policy. One area that the commission felt needed more attention was culture. It decided to commission exploratory research on policies that affect the cultures of immigrants and their descendants in a number of European countries.

Further consultations in the commission led to more precise guidelines for the design of the study. In the first place it was to focus primarily on policy relating to religion and language, central domains of culture. For religion this meant investigating how governments respond to so-called new religions – that is, religions formerly not represented, or only very marginally, in the receiving society, but whose scale and significance has substantially increased in recent decades as a result of immigration. This mainly involves non-Christian religions, and Islam in particular. ‘Language’ referred to the immigrants’ ‘own’ languages, and especially to education in those languages – what we shall designate here as Immigrant Minority Language Instruction (IMLI, known in the Netherlands by the acronym OALT).

Second, in view of the available time and resources, the commission decided to confine the study to five western European countries – Belgium, Germany, France, Great Britain and the Netherlands. These nation states have had comparable post-war experiences with immigrants, and there is ample material on them. This choice of countries obviously has its drawbacks. For one thing the southern European countries are not represented, and they have increasingly become immigration countries in recent decades. Perhaps more important is that Sweden has remained out of the picture. More than any other European country its policies can be characterized as multicultural. To partially make good this weakness we have devoted attention to Sweden's policies on IMLI, an area that well reflects the specific character of Swedish immigrant policies.

Third, the commission felt that language and religion policy should be considered in their relation to general policy on immigrants, and in particular integration policy. Given the scale and complexity of the subject, it was decided that this part should concentrate on the labour market.

A fourth and final decision was to involve research institutes and researchers in the study whose experience and knowledge would enable them to complete the task in a relatively limited time with the aid of supplementary research. A collaborative framework was created between the Institute of Sociology of Law of the University of Nijmegen, the Research Group on Language and Minorities at Tilburg University, and the Institute for Migration and Ethnic Studies (IMES), University of Amsterdam. The Institute of Sociology of Law took responsibility for the research on integration policies in the five countries, the Research Group on Language and Minorities for IMLI policy, and the IMES for policy on ‘new’ religions.<sup>1</sup>

## 1.2 Objectives of policy

Before we formulate the research questions that have shaped this study on European immigrant policies, it seems worthwhile to consider several distinctions that can be made within such policy. We begin by differentiating policy objectives from the ideological conceptions associated with them. We base ourselves on the classification made by Stephen Castles and Mark Miller in their book *The Age of Migration* (1993).

Castles and Miller identify three models that reflect how states respond to ethnic-cultural diversity : the *exclusion model*, the *republican model* and the *multicultural model*. Germany, France and Sweden are the European countries seen to best represent the respective models.

In a later publication Castles no longer speaks of an exclusion model, but uses the more precise term *model of differential exclusion*. We prefer this term because the countries involved do not want to prevent immigration at any price, or simply throw out immigrants who have lived there indefinitely; they are just hesitant to accept their presence. The reason for admitting these immigrants was an economic one, and understandably their participation in the labour process remains an important goal. Characteristic features of this model are its restrictive naturalization requirements and an ideology that ‘we are not

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<sup>1</sup> Hans Vermeulen coordinated the project, assisted in several tasks by Boris Slijper. Kees Groenendijk and Rinus Penninx offered their suggestions and comments at all stages of the study. Heleen Ronden of the IMES took charge of the subediting.

an immigration country'. This is tied to a definition of the nation in terms of descent and 'blood' – that is, in terms of *jus sanguinis*.

The republican model starts from very different, in some respects even antithetical, premises. Not blood rights, but *jus soli*, soil rights, are the basis of membership in the nation. In principle, all people who are admitted to the territory of the nation and settle there permanently should belong to that nation. Foreigners can readily acquire the nationality of their country of residence, and thus they are fairly quick to gain legal rights equal to those of the indigenous population. This 'French model' is often juxtaposed to the 'German model' in a positive sense and presented as a *model of inclusion*. In later publications (1994, 1995) Castles refers to this model as an *assimilationist model*. That designation has a negative ring to it. It makes it plain that 'inclusion' is tied to the expectation – or even the condition – that immigrants should assimilate to the majority culture. It also involves strong notions of the superiority of that culture.

Castles and Miller called their third model the multicultural model, and Castles (1995) later speaks of the *pluralistic model*. Like the republican model, it is a model of inclusion or absorption, but it differs from it fundamentally with respect to cultural policy. It includes no demand or desire for immigrants to assimilate, but it is based on tolerance or even encouragement of cultural difference. This does, however, require of immigrants an 'acceptance of core political values' (Castles and Miller 1993 : 226). As far as the word *assimilation* applies here, it is to these core political values.

The three models thus clearly diverge on the issue of cultural policy – understood here in its broadest sense, and therefore including the important domains of language and religion. In the differential exclusion model, policymakers stand aloof from cultural policy, or they may even try to sustain the cultures of immigrant groups with an eye to their eventual remigration. The republican model is geared to cultural assimilation. The multicultural model is founded on tolerance and it may even give active support to the non-dominant cultures.

A second classification scheme based on policy objectives is also relevant here. It originates in political philosophy and involves a distinction between two types of liberalism. Following Walzer (1992), we shall just call them 'Liberalism 1' and 'Liberalism 2'. Liberalism 1 assumes individual rights and a neutral state which (in a certain sense) concerns itself exclusively with fair decision procedures. It has also been called procedural liberalism. Under Liberalism 2, the state commits itself, in Walzer's words, to support 'the survival and flourishing of a particular nation, culture, or religion, or of a

(limited) set of nations, cultures, and religions' (1992 : 99). This second form of liberalism corresponds to Taylor's (1992) 'politics of recognition'. We should remember here that these are political ideals. Many observers doubt, for example, whether neutrality is possible.

### 1.3 Types of policy

Policy can be differentiated not only by its objectives, but also by the areas it targets. Another important and frequently made distinction is that between *general* and *targeted policy*. We will have a brief look at both of these distinctions.

For our purposes here, a first key distinction is between policy aimed at the management and regulation of immigration itself and policy addressing the changes in society that result from immigration. Hammar (1985) distinguishes these two aspects with the terms *immigration policy* and *immigrant policy*. The term *integration policy* is sometimes used as a virtual synonym of the latter. We will therefore make a few brief remarks about the notion of integration.

Integration is a broad-ranging concept with several different dimensions. Here we shall only distinguish *structural integration* and *sociocultural integration*. Structural integration relates to the political-economic dimension. A good deal of consensus prevails about what it implies. It can be described as full participation in the institutions of society, and by this we understand equitable participation. For groups in an inferior position, then, structural integration means upward mobility or improvement of their present position. Less agreement exists about the meaning of sociocultural integration. This dimension generally involves a process by which a group or members of it develop social relations with the surrounding society and adapt themselves to some extent to the culture of that society, especially its public culture. The notion of sociocultural integration often assumes some degree of preservation of cultural distinctiveness and a mutual appreciation and respect for such differences.

One problem in equating immigrant policy with integration policy is that this could be taken to mean that any immigrant policy as it applies to sociocultural issues can, or should, exclusively serve the goal of integration. It might even suggest that policy towards non-indigenous languages and 'new' religions should be used to promote political and economic integration. To avoid giving that impression, we do not regard sociocultural immigrant policy

here as part of integration policy. We reserve the latter term for the political and economic sphere.

Hammar makes a further distinction between *direct* and *indirect immigrant policy*. By direct policy he understands ‘special measures to improve the situation of immigrants’ (1985 : 9), and he speaks of indirect migrant policy ‘when general public policy affects immigrants substantially’ (ibid). It is clear that Hammar's distinction is closely related to that between *general policy* and *specific policy*, except that his indirect policy includes only one part of general policy, namely the part that substantially affects immigrants. In situations where general policy turns out to have adverse consequences for specific groups in society, in this case immigrants, authorities can act in one of two basic ways. They can adjust the general measures in a way that eliminates the adverse consequences or reduces them in quantity or scale; it is here that Hammar's term indirect immigrant policy seems appropriate. Alternatively, they can respond with specifically targeted measures.

The term *specific policy* is often not clearly defined. Sometimes it is used in a very general sense to mean policy aiming at either specific *problems* or specific *groups*. In our line of thought, however, specific problems can be tackled through general policy. We will use the term *target group policy* exclusively for specific policy that targets *specific groups or categories of people*. Here we concur with Breebaart and associates (1996 : 174), who emphasize what they call ‘acceptance criteria for policy’. Target group policy is that which applies only to the segment of society that satisfies the acceptance criteria. Gender, age and ethnic origin are traits that can serve as acceptance criteria. General policy, then, is policy that applies to everyone – policy to which all citizens or residents have access.

To clarify the distinction we are making between general and target group policy, we shall contrast it with the way this distinction is drawn in a Council of Europe report (RvE 1991 : 27-30). The report does not define or describe the difference between the two forms of policy, but it does differentiate two types of *target group policy*. The purpose of the first type is to provide immigrants with instruments they need to achieve integration. The report mentions language courses, special reception classes and special agencies for social work. The second type is intended to improve access to institutions; examples are multicultural education and affirmative action. According to the definition we are using, only affirmative action would qualify as target group policy. Multicultural education targets not specific groups, but the population in general.

The extent to which target group policy is institutionalized can greatly vary. For example, temporary measures can be adopted in a particular city to help marginalized youth from a particular ethnic group. Or a longer-term national policy can be formulated for specified groups of immigrants, as with the Dutch minorities policy. The rights of minorities can even be laid down in law for an indefinite period, as is the case with the minority language rights of the Frisians in the Netherlands.<sup>2</sup>

When targeted measures are adopted for immigrants, the question arises as to how exactly the target group or category is to be defined. Will the measures apply to all persons from abroad, in other words to immigrant ethnic minorities in the broadest sense of the word? Or will they be aimed at a certain category of them? If so, on the basis of what criteria? A decision to target only some of the people from abroad can be justified on various grounds. One is a history of subordination through exploitation, discrimination and racism. A second ground is deprivation, particularly in a socioeconomic sense. This argument is often used in conjunction with the first. A third argument is that the government bears special responsibility for some specific group or category of people; it is often applied to immigrants from present or former colonies, such as the Moluccans in the Netherlands. It may also be used for immigrants who are seen as belonging to the ethnically defined nation, even though a common origin may lie far in the past and be almost mythical in nature. This is exemplified in the 'return' of the resettlers (*Aussiedler*) to Germany or the Pontians to Greece.

The distinction between general and target group policy should not be confused with the contrast drawn earlier between two kinds of liberalism. The former distinction mainly involves the implementation of policy (who is entitled to it), the latter applies to the policy objectives. Certainly they are not independent of each other. Neutral policy is always general policy: rules apply to everyone, regardless of what religious or ethnic community they belong to. General policy, however, is not necessarily neutral. If policy favours one language, one religion or (more generally) one view, or even imposes them on all the people, that policy is general but not neutral.

#### **1.4 Size and definition of groups**

To develop, implement and evaluate general or target group policy when they are aimed partly or wholly at ethnically defined categories in society, it is

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<sup>2</sup> In this connection we refer to the discussions of special rights and collective rights for ethnic groups (Galenkamp 1993; Kymlicka 1995).

essential to gather reliable information about the composition of that multi-ethnic society.<sup>3</sup> That is no simple task, because if dissimilar criteria are used, the available data cannot be compared. This is even more complicated if data on more than one country are to be used.

The only truly comparable data available are those based on the criterion of nationality.

**Table 1.1**

Groups with foreign nationalities in 1993, and number of naturalizations since 1980, in absolute terms and as percentages of the total population

	Belgium	Germany	France <sup>1</sup>	Britain <sup>2</sup>	Netherlands
Total population	10,068,319	80,974,632	56,651,955	57,222,000	15,239,182
<b>EEA and Switzerland</b>	<b>544,896</b>	<b>1,761,262</b>	<b>1,345,778</b>	<b>783,000</b>	<b>192,681</b>
Greeks	19,987	345,902	6,091	25,000	5,554
Italians	217,534	557,709	252,759	73,000	17,284
Spaniards	49,459	133,847	216,047	33,000	16,788
Portuguese	20,495	98,918	649,714	15,000	9,352
Others	237,421	624,886	221,167	637,000	143,703
<b>Other Europe</b>	<b>102,986</b>	<b>3,602,667</b>	<b>315,708</b>	<b>118,000</b>	<b>243,196</b>
Poland	4,812	285,553	47,127	21,000	5,362
Ex-Yugoslavs	7,468	1,018,056	52,453	16,000	18,809
Turks	88,269	1,854,945	197,712	31,000	212,450
Others	2,437	444,113	18,416	50,000	6,575
<b>Africa</b>	<b>190,153</b>	<b>283,901</b>	<b>1,633,142</b>	<b>204,000</b>	<b>203,255</b>
Algerians	10,443	14,373	614,207	5,000	824
Moroccans	144,993	80,278	572,652	7,000	165,138
Tunisian	6,195	28,075	206,336	=	2,506
Others	28,522	161,175	239,947	192,000	34,787
<b>Americans</b>	<b>20,229</b>	<b>168,758</b>	<b>72,758</b>	<b>280,000</b>	<b>49,644</b>
North Americans	13,530	113,952	31,044	157,000	15,858
Central & South Americans	3,358	48,056	25,962	7,000	31,291
Caribbeans	236	6,686	15,752	75,000	1,428
Others	3,105	64	=	41,000	1,067
<b>Asians</b>	<b>25,277</b>	<b>594,665</b>	<b>226,956</b>	<b>545,000</b>	<b>61,384</b>
Bangladeshis	=	6,589	=	73,000	574
Indians	3,226	35,517	4,579	152,000	3,425
Pakistanis	2,069	32,197	9,796	98,000	3,995
Others	19,982	520,362	212,581	222,000	53,390
<b>Australians and Oceanians</b>	<b>635</b>	<b>8,421</b>	<b>2,260</b>	<b>76,000</b>	<b>3,000</b>
<b>All others</b>	<b>25,089</b>	<b>76,118</b>	<b>=</b>	<b>14,000</b>	<b>7,248</b>
<b>Cumulative total</b>	<b>909,265</b>	<b>6,495,792</b>	<b>3,596,602</b>	<b>2,020,000</b>	<b>757,408</b>
Naturalized since 1980 <sup>3</sup>	220,358	274,869	408,541 <sup>4</sup>	844,974	314,912
<b>Total</b>	<b>1,129,623</b>	<b>6,770,661</b>	<b>4,005,143</b>	<b>2,864,974</b>	<b>1,072,320</b>
% of total population	11.2 %	8.7 %	7.1 %	5.0 %	7.0 %

Source : EUROSTAT 1995 : 44-51, 16.

<sup>1</sup> 1990 figures.

<sup>2</sup> Labour Market Survey, rounded to thousands.

<sup>3</sup> Excluding 'automatic' naturalizations by birth or decree.

<sup>4</sup> Since 1986.

<sup>3</sup> The principal publications used for this section are De Beer 1995, Bijlsma & Koopmans 1994, Broeder & Extra 1995, and Verweij & Dagevos 1995.

Table 1.1 summarizes these data for Belgium, Germany, France, Great Britain and the Netherlands. They are derived from a publication of EUROSTAT (1995), the statistical agency of the European Union.<sup>4</sup> EUROSTAT obtained the data from the statistical offices of the five countries listed.

Nationality data are sometimes used to get an indication of the size of ethnic minority groups. They are unsuitable for that purpose, however, since people who have taken on the citizenship of their new country do not appear in the statistics. A somewhat better estimate of the total size of the non-indigenous population can be obtained by including naturalized citizens in the figures. According to this method (see Table 1), an estimated 11 % of the Belgian population are of foreign origin, as are 9 % of the German population, 7 % of the French and Dutch populations, and 5 % of the British population. These figures, too, leave a large number of people out of the picture who have either directly (themselves) or indirectly (through their parents) come from abroad. A case in point are immigrants from former colonies. Had they been included, then especially Britain would have had a higher percentage of ethnic minority residents. Other criteria that can be used besides nationality are country of birth (often in combination with parents' country of birth), ethnic identity<sup>5</sup> or the so-called home language criterion.

The trouble with using nationality, birthplace, ethnic origin or language spoken at home as indicators of ethnic categories is that this implicitly assumes such criteria all refer to the same clear-cut entities. That is by no means the case. It would be equally justifiable, or perhaps even more so, to regard each one of these indicators as a criterion to define a *different* group or category. It is more effective to use different criteria to pursue different policy objectives.

Our chapter on religion is a good example of what we mean. Although religion often serves as an ethnic criterion both for its adherents and for outsiders, it is still more correct to treat it as an independent criterion. Unfortunately, no data is normally available for this criterion, so that nationality or country of birth have to be used to estimate the number of Muslims. This is basically how the figures in Table 1.2 have been arrived at, except that one adjustment has been made. For the number of persons of a given nationality, say Turkish, data from their original country have been used to estimate what percentage belong to a religion other than the predominant

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<sup>4</sup> EUROSTAT hopes to publish data soon on country of birth.

<sup>5</sup> Here ethnic identity means what ethnic group (or groups) one considers oneself as belonging to.

one. The number of Turkish Muslims per country was then estimated by deducting this percentage from the total number. This method does not allow for secularization or non-believers, however.

**Table 1.2**

Estimated Muslim population in absolute terms and as percentages of the total population

	Belgium	Germany	France	Britain	Netherlands
Number	244,000	2,012,200	2,619,000	1,000,000	441,900
% of total population	2.47 %	2.54 %	4.93 %	1.79 %	3.19 %

*Source* : Peach & Glebe 1995 : 28.

## 1.5 Research questions

The comparative study of immigration policy and immigrant policy in the different European nations has been a topic of increasing interest in recent years. Much attention has been focused on the differing assumptions underlying policy, which have in turn been linked to factors such as conceptions of citizenship and national identity. We shall return to this point in our conclusions, but we want to emphasize here that our study focuses primarily on the policies themselves. Only in the second instance will we consider the relevance of differences in political ideology.

On the basis of the analysis above, we have arrived at three groups of questions. The first group concerns the broad characteristics of policy, among them the distinction between general and target group policy. The second relates to the implementation and the instruments of policy, and the third group is about the policy differences between the countries in question.

How do the authorities respond to the presence of immigrants ? Do they do so primarily by developing general or target group immigrant policies ? Does policy differentiate in terms of the immigrants' ethnic origin ? How do the authorities justify their policies ?

How is immigrant policy implemented and organized, and what are the principal instruments used ? Which instruments directly or indirectly target ethnic categories, and which are formulated in general terms, that is, ethnically neutral terms ?

How important are the differences between the countries studied ? Can differences on the above issues be explained by their differing political ideologies ? Are immigrant policies in the EU countries converging ?

The first two questions are addressed in Chapters 2, 3 and 4, which respectively treat integration policy, IMLI policy and policy on ‘new’ religions. We consider the third question in the final, analytic chapter. We also return there to the distinction between general and target group policy and we ask how helpful the three policy models discussed above can be in analysing the differences found between countries.

## **1.6 Structure of this report**

Our report is made up of three subsidiary studies. Chapter 2 analyses the policies on integration found in the five countries, with special attention to their impact on employment. Chapter 3 examines policies as they affect immigrant minority languages, and Chapter 4 examines those pertaining to immigrant religions. The chapter on languages also includes Sweden. All three of these component studies are based on data already available as well as on supplementary literature research. Other information has been obtained from experts and relevant institutions in the five countries in order to supplement and verify data from other sources. We account for this in more detail at the end of each research chapter, where we also list the important literature by country. We have chosen this method for the three descriptive chapters in order not to overload the text with references. In introductory and concluding chapters, however, we have inserted the references in the text.

## CHAPTER II

### INTEGRATION

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*Arriën Kruyt and Jan Niessen*

#### **2.1 Introduction**

This chapter summarizes the basic assumptions, the implementation, the organizational structure and the instruments of immigrant policy in Belgium, Germany, France, Great Britain and the Netherlands. Because the integration of immigrants into the labour market is an essential component of immigrant policy, it will receive particular attention.

For each country we provide, as far as possible, a chronological overview in order to detect changes in the principles or the implementation of policy. The overview begins after recruitment of foreign workers was ended in 1973-74. It was only then that most countries – Britain being the exception – began formulating an immigrant policy. In each national overview we first examine what these initially hesitant policies consisted of. Second, we describe the national institutions that implement or support policy. Third, we consider whether they were policies specifically targeting immigrants or generalized policies against deprivation, and whether they made distinctions of ethnic origin. Fourth, we examine the conception of integration underlying the policies. Fifth, we gauge the extent of agreement at the national political level on the basic principles of policy. And finally, we summarize the measures taken in each country to promote the integration of immigrants into the labour market.

#### **2.2 Belgium**

From the 1920s onwards there was labour migration to Belgium, chiefly from Eastern European countries and Italy. After an interruption in the years surrounding World War II, recruitment of foreign workers was resumed from the mid-1950s to the mid-1960s, this time in countries such as Italy, Spain, Greece, Turkey and Morocco. Emphasis was on family migration, because the Belgian authorities expected fewer adaptation problems if foreign workers could lead a normal family life. There were also demographic reasons for this policy. Briefly, Belgium did not assume, as many other countries did, that the workers were arriving for a temporary stay, and it therefore called itself a ‘receiving country’. After the immigration curbs in 1974, which were

prompted by high unemployment, admission policies gradually became more restrictive.

As a result of the 1987 administrative reforms, a number of national government powers relating to immigrant policy were transferred to the three Regions (Flanders, Wallonia, Brussels) or to the three cultural Communities (Flemish-, French-, and German-speaking). Responsibility for employment was assigned to the Regions, and educational and cultural policy to the Communities. The Regions and the Flemish and French Communities now formulate their own immigrant or integration policies. In Wallonia these are oriented to the assimilation policies of France, whilst those in Flanders look more to the British and Dutch integration policies.

### ***Restrictive admission policies and integration***

In its 1981 coalition agreement, the Martens-Gol government asserted that Belgium 'is and must remain a receiving country'. The government resolved to promote the integration of foreigners by means such as naturalization or other ways of granting nationality and by combating every form of discrimination and racism. In its employment policies the government proposed measures to curb immigration and encourage remigration of long-term unemployed, non-EC immigrants.

In October 1983 the government announced its *Bill Addressing Certain Aspects of the Condition of Aliens and Establishing the Belgian Nationality Code*, later known as the Gol Act. It was to effectively implement the 1974 immigration curbs while promoting the integration of legal immigrants. Community and political organizations criticized the Gol Act because it restricted the rights of foreign nationals to family reunification, social security, and settlement in certain municipalities. Critics further argued that neither the firmer anti-discrimination provisions nor the liberalized naturalization rules contained in the Act (which took effect in 1984) went far enough.

The Gol Act used restrictions on the settlement of foreigners in certain towns and urban districts as a key instrument to stimulate integration. Spatial concentration of large numbers of immigrants was believed to lead to their marginalization as well as to hostile reactions from original residents. Such residency bans were indeed in force from 1984 to 1994 in ten municipalities, most of them in the Brussels agglomeration. Those affected by such measures were mainly Turkish and non-European migrants. The Royal Commission on Migration Policy successfully pressed for the repeal of the measures, having demonstrated that they had missed their mark in practice.

Restrictive admission of foreigners, tighter residency requirements, liberalized naturalization procedures, and more stringent anti-discrimination laws were the major elements of the integration policies pursued by the Belgian federal government in the first half of the 1980s. The terms *integratie/intégration* and *inpassing/insertion* were used rather interchangeably in official documents. When defined more specifically, they mainly meant assimilation. The assumption was that the post-war immigrants would assimilate just as the pre-war ones had done. Activities to promote social integration were undertaken almost exclusively by private organizations, with or without government support.

### ***National institutions***

In the course of the 1980s it became evident that more was needed to integrate the immigrants than the instruments applied thus far. The situation of the youth in particular was deteriorating both in education and in the labour market. Furthermore, support was growing for right-wing extremist movements that opposed immigrants and their integration.

In the 1988 coalition agreement, an immigrant policy was proposed which prioritized employment, housing and education. The federal government thought it wise to take the initiative for a genuine immigrant policy, and it felt the appointment of a special commissioner would be an appropriate instrument. An Interministerial Commission on Migrant Policy, made up of representatives of ministers from all administrative levels who held responsibility for the various aspects of policy, was set up to streamline immigrant policy. Interministerial Conferences for Migrant Policy were also convened at regular intervals.

In 1989 the Royal Commission on Migrant Policy (KCM/CRPI) was established by royal decree for a period of four years. It was charged with carrying out research and proposing policy measures in relation to migrant problems, those in labour, housing and integrative education. The Commission began work by holding intensive consultations with political parties, organizations, and embassies of the immigrants' countries of origin. The term 'migrant' was not further specified, but in practice it meant foreign workers and their families.

In the aftermath of the ethnic riots of 1991, the federal government initiated the Incentive Fund for Migrant Policy. It provides once-only or limited-term financial support to employment or training projects, street work, sport and youth work. Three quarters of the available funds are to be spent in

the five biggest cities (Brussels, Antwerp, Ghent, Liege and Charleroi). Applications for projects can be made by either private organizations or various levels of government. Most projects hitherto have been for migrants from outside the European Union (EU).

In 1993, the Centre for Equal Opportunity and against Racism was established by law; though it officially comes under the Prime Minister, it is autonomous. Its task is to promote equal opportunities and combat all forms of discrimination, exclusion, restriction or preferential treatment on grounds of race, skin colour, descent, origin, or nationality. As a national institution, the Centre makes policy proposals, exposes discrimination and supports victims of it. In other words, it concentrates more on subordination than on deprivation. It also administers the Incentive Fund.

### ***Policies on deprivation and target groups***

The national integration policy is at once a general policy against deprivation and a policy specifically targeting immigrants. The Migrant Policy Commission concluded that immigrant policy consisted of different parts, falling variously under aliens policy (policy regulating the legal position of foreign nationals), ethnic policy (aimed specifically at immigrants) and minority policy (aimed at deprived groups in general).

Having taken stock of the problems involved, the commission differentiated problems not directly related to immigrant status from those that arose from that status. Examples of the former were a total or partial failure to apply legislation to a given group (in this case immigrants), and the weak socioeconomic situation that certain groups of immigrants found themselves in. In such respects immigrants were in the same predicament as other people. Examples of immigration-related problems were subordination and discrimination based on nationality, cultural differences or ethnic background. In its four-year period of existence the commission formulated a host of policy proposals, many of them on the basis of this inventory of problems. It took great pains to fit immigrant policy into mainstream policy against deprivation, and simultaneously to demonstrate the need for targeted integration policies. It called for special attention to the emancipation of female immigrants. Since 1993 the Centre for Equal Opportunity has largely continued this course.

In addition to such considerations, international obligations also influence the targeting of certain groups of immigrants. Obligations such as those under the Treaty of Rome have increasingly been introduced into Belgian legislation and regulations. One result of this is the legal distinction

between immigrants from EU member states and ‘third-country nationals’. The former are by far in the majority in Belgium. A further refinement of legislation and practice was later made within the non-EU group, in compliance with the Treaty of Maastricht and with European Court of Justice decisions. The latter required the application of Association and Cooperation Agreements between EU countries and other countries such as Morocco and Turkey. Differences in national origin mainly have consequences for immigrants' residence status and their access to the labour market, social security and political rights.

No distinction is made in federal and regional policy with regard to the ethnic origin of migrants. It is increasingly assumed that immigrant policy no longer applies to migrants from EU countries. Policy does give special attention to the position of immigrant young people and women. In addition, geographical criteria are applied to help target policy, for example cities or ‘priority action zones’ (see below).

### ***Integration concept***

The Migrant Policy Commission also worked out a definition of the term ‘integration’ (or ‘*inpassing/insertion*’), which it contrasted with ‘assimilation’ and ‘segregation’. The proposals for immigrant policy which the commission would be formulating were to be

- 1) ...based on the notion of *integration*, containing the criteria of
  - a. assimilation when necessary for ‘public order’;
  - b. continual stimulation of the fullest possible integration according to the basic guiding social principles which underpin the culture of the host country and which involve modernity, emancipation and full pluralism, as commonly understood in a modern Western state; and
  - c. at other levels, unambiguous respect for cultural diversity-as-mutual-enrichment;
- 2) ...coupled to stimulation of structural involvement of minorities in the activities and objectives of the public authorities (KCM/CRPI 1989 : 38-39).

The commission gave no further specification of the term ‘minorities’ and spoke only of groups with different national origins. The terms multiculturalism and pluriculturalism are used sparsely in official government documents and reports by the commission and the Centre for Equal Opportunity. They mainly describe a situation – there are groups in society

with different cultures – rather than expressing an ideal. The commission opposed the idea that immigrants with a culture related to the Belgian one were easier to integrate than others. That would effectively reduce the integration problem to groups from North Africa. Pointing to the ‘intercommunity’ problems between Flemings and Walloons, the commission argued that every group makes its own demands and has its own possibilities when it comes to societal integration.

### *National consensus*

The integration concept formulated by the Royal Commission on Migrant Policy has been reiterated by successive governments at the federal and regional levels, as well as by Parliament and by many organizations in society. The principles of federal policy are couched in rather vague and meagre terms. The integration debate is characterized by a practical attitude little tinged by ideology.

In Flanders the regional parliament adopted its first *Policy Memorandum on Migrants* in 1989. The memorandum *A Coordinated Migrant Policy* followed in 1992, and the *Policy Letter on Migrant Policy* a year later. All these documents share the principles formulated by the Royal Commission. The aim of Flemish immigrant policy is to relieve deprivation; it is explicitly described as an equal opportunity policy. It is to focus on creating basic preconditions to enable immigrants to fully participate in Flemish society on a basis of equality and respect for the distinctiveness of others. The policy implies group-specific measures in the major sectors of Flemish public policy – labour, housing and education. Such measures are to tie in as well as possible with general policy in those sectors; they are to be seen as an intensification of general policy. Later memoranda have put more emphasis on general policy against deprivation or welfare policy, while still acknowledging the need for the targeting of certain groups, such as immigrants.

The Walloon government drafted a decree in 1994 which was intended to create a statutory framework for integration policy. The policy principles are derived from those of the Royal Commission. It is principally a general policy to prevent social exclusion, but a new feature is that it focuses some attention on problems facing immigrants. Emphasis is on combating illiteracy (especially among women), on the teaching of French as a second language, and on education in the democratic process. A crucial role is assigned to local authorities, to four regional centres for immigrant integration, and to the Incentive Fund.

Flanders has an immigrant policy within the context of a general policy on deprivation. Under the influence of right-wing extremism, emphasis in political debates tends to be on general policy. Wallonia conducts a general policy against social exclusion, and only recently have appeals been made for more specific attention to immigrants.

### ***Integration and the labour market***

Housing, education and employment form the core of Belgian integration policy. In addition to general employment policies, many specific measures have been adopted or proposed at both the federal and the Flemish regional level which are aimed at enhancing the integration of immigrants in the labour market. In principle these make no distinctions of national origin. Wallonia has a general employment policy.

To improve access to the labour market, the federal authorities have adopted a number of key measures, many of which were proposed by the Royal Commission or the Centre for Equal Opportunity. In 1995 a royal decree exempted foreign nationals with permanent residence permits from applying for a labour card. In 1994 the federal government granted EU nationals access to public service posts on the same conditions as Belgians, with the exception of jobs relating to public order and the protection of state interests. The Flemish government has dropped the nationality requirement entirely. This measure is of symbolic value, since the Belgian constitution bars so-called third-country nationals from employment in civil service posts. It can be seen as a signal that the Flemish authorities want to go further than the federal ones.

The so-called priority action zones (abbreviated to ZAP from the French *zones d'action prioritaire*) are designated yearly by the Interministerial Conference, in consultation with the Regions, the Communities, and the Centre for Equal Opportunity (and until 1993 with the Royal Commission). The designation criteria are : a sizable concentration of foreigners in a given area or town; the presence of groups of foreign youth or youth of non-Belgian, non-EU descent; and the presence of youth facing problems such as unemployment, drug use and early school-leaving. Projects in such zones can receive funding from the Incentive Fund. Among these projects are those that promote the social and vocational mobilization of young people of foreign descent aged 16 to 25. In 1991 and 1992 the Fund put up a total of 480 million Belgian francs, 300 million in 1993, 310 million in 1994, 320 million in 1995 and 313 million in 1996.

In 1992 the federal and regional authorities concluded a cooperative agreement on a guidance scheme for unemployed people aimed at stimulating their integration or reintegration into the labour market. A youth jobs scheme was initiated a year later which gave employers considerable exemptions from employers' contributions. Neither measure targeted immigrants specifically. No figures on immigrants are available yet for the guidance scheme, but over 50,000 young people took part in the jobs scheme in its first year. Of them 91 % were of Belgian nationality, 4 % were Italian, and under 3 % were of Turkish, Moroccan, Tunisian or Algerian nationality.

Under a 1993 decree, unemployed people are to receive equal treatment. State employment offices are prohibited from distinguishing job seekers in terms of gender, age, race, colour, nationality, religion, convictions or social origin. The offices have developed their own anti-discrimination policy, and they organize training sessions for employment agencies, which are required to observe this code in practice. This project was started when it came to light that many agencies practised discrimination. Local-level initiatives to recruit more Belgians of foreign descent for the police have not yet shown results. According to the Equal Opportunity Centre this is partly due to factors within the police force, such as negative attitudes on the part of police officers, and partly due to adverse experiences immigrant young people have had with the police. The Centre has taken a number of steps to correct this situation, among them proposals for more affirmative action (not positive discrimination).

The Royal Commission tried in vain to convince the public authorities to adopt affirmative action personnel policies. The Equal Opportunity Centre then decided to implement six affirmative action projects in the private sector, in cooperation with the King Baudouin Foundation. The purpose of this initiative was to persuade employers to introduce equal opportunity policies for immigrants. The projects were carried out half-heartedly, and thus failed to achieve the desired results. As a consequence, the Equal Opportunity Centre has now urged the adoption of an official affirmative action policy similar to those in force in the Netherlands, Canada and Britain. The Flemish regional authorities have pressed for legislation modelled on the Canadian Employment Equity Act. They have already decided to stimulate target group policies for those at risk in the labour market (women, disabled people and immigrants). They have reached agreement with employers' and labour organizations to devote more attention to these groups. A Guidance Structure for Migrant Employment has been set up as an annexe to the Flemish Centre for the Integration of Migrants (VCIM).

## 2.3 Germany

Germany does not regard itself as an immigration country. Nonetheless, no other Western European nation has experienced a greater flow of immigration. The number of persons who have settled in Germany since the Second World War is put at between 20 and 25 million. In 1991, 8.6 % of the population were foreign nationals, of whom 60 % had been there over ten years.

### *Admission and integration policies*

Since the Second World War, the following major groups have emigrated to West Germany. First of all the resettlers (*Aussiedler*), people of German descent whose forebears had emigrated many generations ago into lands that were later in the Soviet Union, Poland, Czechoslovakia or Romania. An estimated 1.6 million of them left for Germany between 1980 and 1991, and since then 200,000 per year have been admitted. They can claim German nationality on the basis of legislation dating from 1913; they may keep their Eastern European nationality. The government has always assumed they would settle in Germany permanently. Since 1993 their immigration has been subject to an annual quota.

Second, between 1945 and the building of the Berlin Wall in 1961, an estimated 3 million Germans from the Soviet occupation zone, later East Germany, came to live in West Germany. From the opening of the Wall in 1989 until 1992, about 1 million Germans moved from East to West. Around 450,000 Eastern Germans now still commute to work in Western areas.

Third, vast numbers of asylum seekers are in Germany. In the post-war period they were mainly Eastern European; later they came from countries all over the world. A peak of 440,000 was reached in 1992. Following a tightening of laws and admission policies, their numbers dropped to 130,000 per year in 1994 and 1995.

Fourth, there are contract workers from Eastern Europe, who are hired to work in Germany for a limited period and are supposed to return home when their contract expires. In 1992 some 50,000 three-month permits were issued, in addition to 13,000 permits for cross-border commuters.

Fifth, there is the group initially referred to as guest workers, with their families. Guest work began around 1955. Until the recruitment ban prompted by the 1973 oil crisis, firms enjoyed considerable freedom to hire guest workers. It was always assumed the workers would return to their countries of origin when their contracts expired. The guest workers themselves also

assumed their stay would be temporary. Although sharp fluctuations in immigration and remigration did occur,<sup>6</sup> a growing number of foreign workers ended up settling permanently, and family reunification got underway. Recruitment no longer took place after 1973, but the numbers of foreigners rose steadily due to family reunification and procreation. Discussions on integration began, initiated by advocates of their cause who published the *Düsseldorf Programme on Alien Rights Reform* in 1976. Three years later the first Aliens Commissioner, Heinz Kühn, presented a series of detailed policy proposals to the federal government entitled *State of Affairs and Further Development of the Integration of Foreign Workers and Their Families in the Federal Republic of Germany*.<sup>7</sup> Kühn rejected biculturalism as unrealistic, but he also opposed compulsory germanization.

The government was still shying away from proposals that suggested that the foreigners might stay permanently. The political debate at the time still concerned itself with remigration and the desirability of a rotating labour scheme after the Swiss model. Even foreigners who had lived and worked in Germany for many years received no permanent residence permits, let alone the opportunity to become naturalized. Moreover, from the early 1980s the debate came to be increasingly dominated by the growing numbers of asylum seekers and the fear of 'being overrun'. After 1980 a range of measures were introduced to restrict family reunification and curb the number of asylum seekers. A Remigration Stimulation Act took effect in 1983, an attempt to encourage foreigners to return home voluntarily. This law and the debates that accompanied it were by no means conducive to the promotion of integration.

German policy at the time was a sort of two-track policy. The temporary nature of guest work and the possibility of remigration were stressed, with the simultaneous acknowledgement that large numbers of foreigners would remain and would need to integrate. Few facilities for the latter were created, however. Basically, foreigners were given the choice either to go home or to assimilate individually. Politicians feared the emergence of minorities, and they rejected the whole concept of ethnic minorities. Only when it became patently evident in the mid-1980s that remigration measures were having little effect did the discussion about labour rotation and remigration die out. From then on the debate was about what measures might further integration. In

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<sup>6</sup> Werner (1994) reports that 14 million foreign workers came to Germany in the period 1955-73, of whom 11 million returned home.

<sup>7</sup> *Stand und Weiterentwicklung der Integration der ausländischen Arbeitnehmer und ihrer Familien in der Bundesrepublik Deutschland*. Entzinger (1994) has characterized the recommendations as assimilationist.

1989, the Christian-Liberal coalition parties CDU, CSU and FDP reached agreement on the memorandum *Outlines for Aliens Legislation*. These resulted in 1991 in a new Aliens Act which made it easier for long-time resident aliens to gain permanent residence status, and for young people of foreign descent to be naturalized. To date, however, the German government still views naturalization not as an instrument to promote integration, but as the end point of a successful integration process. For this reason foreigners normally cannot be naturalized until after fifteen years' residence, and they must relinquish their former nationality. The Greens, the Social Democrats (SPD), the Liberals (FDP) and some Christian Democrat politicians argue in favour of naturalization as an integration instrument – as applied in some other countries – and for allowing prospective Germans to retain their original nationality.

### ***National institutions***

The office of the Federal Government Commissioner for the Interests of Aliens has been operative at the federal level since 1978 (until 1991 it was called 'for the Integration of Foreign Workers and Their Dependants'). The second commissioner resigned her post after ten years in frustration at the federal government's lack of interest in her work. The present commissioner, in office since 1992, combines her job with that of parliamentarian in the hope of wielding more influence. She appears to have been only moderately successful.

More power is exercised by the Ministry of the Interior, the real place where policy is coordinated. This is done in frequent consultation with ministries of the regional states (*Länder*). Those states as well as large cities also have aliens commissioners to represent the interests of foreigners. What influence they have depends on their personality and the willingness of other administrators to listen to their ideas. Some cities also have Foreigners' Auxiliary Councils, chosen by resident aliens to advise the local authority.

### ***Policies on deprivation and target groups***

For the German resettlers there has always been a group-specific policy to help them integrate into West German society. Though they do have German ancestors and can claim German nationality immediately upon arrival, many such resettlers speak little or no German. Special laws and regulations entitle them to eight months of German language training. On arrival they are entitled to a lump-sum grant and a loan for home furnishings. Employment offices are to help them in finding jobs, and there are other measures to assist

self-employed people. Educational grants are available to young people. There are group-specific tax arrangements and social security entitlements. Resettlers are assigned on arrival to one of the states, where they are entitled to housing. Such facilities, together with the admission quotas applied to this specific group, make this a form of target group integration policy that is unique in Western Europe.

For the category of guest workers and their families, policy was markedly different, especially in its early stages. These immigrants were presumed to return to their countries of origin in due course. In many German cities an official dispersal policy was in force. When the percentage of foreigners in a given district was considered too high, no more were allowed to settle there. The justification for such measures was that they would further integration and keep neighbourhoods from becoming dominated by foreigners. Berlin maintained such a policy into the 1990s.

In social welfare work there is a targeted policy for foreigners. It is carried out by three social work organizations, each of which takes responsibility for a specific nationality: the trade union-linked Arbeiterwohlfahrt works with Turkish people, the Protestant Diakonisches Werk with Greeks, and the Roman Catholic Caritas with Italians. As of 1991, about 1,100 employees were working with foreigners. Increasingly they are from the clients' original countries but have been trained in Germany.

In 1974 the German Language Association for Foreign Workers was founded at the initiative of the Labour Ministry. It funds language courses for immigrants from the former recruitment countries. Some 90,000 foreigners, two thirds of them Turkish, took courses in 1991.

### ***Integration concept***

Integration policy for resettlers and that for foreign nationals differ radically. The former have always been regarded as Germans who are back home after generations of absence. For other categories of foreigners, thoughts about integration were rather late to materialize. Longer than other European nations, Germany persisted in the belief that their stay was temporary and that they would at some point return en masse to their countries of origin.

German thinking on integration is deeply influenced by notions of German nationality and of who is part of the German people. Germany is one of the European countries that firmly clings to the principle of *jus sanguinis*. You are German if you are descended from a German ancestor. This results in the curious state of affairs that someone who speak no German, but can prove

one of their ancestors emigrated to Russia at the time of Catherine the Great, is regarded as a German. A child born and bred in Germany but whose parents come from Turkey is not considered German. In debates on the subject in recent years, such children have been referred to as ‘natives without German passports’ (*Inländer ohne deutschen Paß*). The emphasis on the notion of ‘a people’ relates to the historical fact of Germany's constantly shifting borders.

Until recently, requirements for naturalization in Germany were more exacting than anywhere else in Western Europe. There were rigorous demands as to proficiency in German, income, housing and good social behaviour. Some observers quipped that to qualify for naturalization in Germany one had to own a German shepherd and belong to a *Stammtisch*. The *official* German concept of integration amounts to assimilation. The Ministry of the Interior defines integration as a process of adaptation to the German situation. Foreigners can participate in German society when they have grown accustomed to its norms, values and way of life. Fundamental conditions are respect for German culture and the basic principles of the German constitution (separation of church and state, equality of women, religious tolerance); the acquisition of basic knowledge of the German language; renunciation of extreme religious notions and practices; and integration into the educational system (also for women and young people).

Since 1991 the discussions and measures have concentrated on ways to enable children to obtain German citizenship more easily. Proposals to grant citizenship to second-generation immigrants on the basis of the *jus soli* principle are now under serious consideration. Naturalization requirements for them have already been eased. Remarkably, the federal states differ widely in their naturalization practices. The naturalization rate in Bavaria, governed by the CSU, lies far below the national average; that in Berlin and in SPD states is substantially higher. Bavaria adheres to a strict notion of assimilation, while immigrants in Northern Germany can become Germans while retaining an ethnic identity of their own.

### ***National consensus***

At present there is no longer a national consensus on immigration and integration. The current CDU/CSU/FDP government still sticks to the old notion that Germany is not an immigration country. However, there are strong misgivings about this notion both within the governing parties and in the opposition, consisting of SPD and the Greens. These critics point out that Germany has been an immigration country since the Second World War and

for demographic reasons will also need immigration in the future. They are pressing for an explicit immigration law which can regulate immigration and preclude people who want to come to Germany for economic reasons from taking recourse to asylum laws.

Views about integration and integration policy are diverse. This is evidenced in the debate on whether naturalized immigrants may also keep their original nationality. The opposition and one current of thought in the CDU no longer oppose this. According to insiders, the CSU has so far managed to prevail on the CDU to withhold its support. In states governed by the SPD and in Berlin, the terms of the law are already being interpreted in ways that enable young people to be naturalized while retaining their original nationality.

Some participants in the debate have argued for a minorities policy after the Dutch model. Others reject this, pointing to the tensions between Kurds and Turks fought out on German territory. The present ethnic tensions in the former Yugoslavia have furnished opponents of an ethnic minorities policy with ample arguments. These are selective arguments, given that the German government has traditionally recognized the Danish minority in the northern state of Schleswig-Holstein, and now does the same with the Sorbs in Saxony, who were protected by the East German state. They have the right to their own language and culture. The resettlers, too, have their publicly subsidized organizations to keep alive the cultures of their homelands. The question thus arises why Danes and Sorbs can be recognized as minorities, but not the two million resident Turks. The answer lies in part in the history of Germany, where the former groups have long enjoyed recognition. In part it also lies in the experiential world of many Germans, who do not regard them as foreigners, but do (still) regard Turks as such, even after they have acquired German citizenship. It is hence unlikely that a minorities policy comparable to that in the Netherlands will be implemented in Germany.

The notion of a multicultural society has been introduced into the debate by church activists. Daniel Cohn-Bendit, former Frankfurt alderman, has also attracted strong attention with his book entitled *Heimat Babylon*. But the German government is obviously not game.

Although the basic assumptions and concepts differ, in *practice* a consensus does seem to be growing that it would be wise to take measures help the youth of foreign descent to integrate into German society.

### ***Integration and the labour market***

Much work has been made of measures to improve the vocational qualifications of foreign nationals. Policy on unemployment is based largely on such measures, because job chances for the unskilled are minimal. Germany has an extensive apprenticeship system. As in other countries, a substantial percentage of the employers give preferential treatment to German young people in allocating apprenticeships. Foreign young people thus enter the labour market with a handicap.

Officially the entire package of provisions available to Germans is also accessible for resident aliens. Participation is arranged through the employment office, which bears the costs of the training as well as the training allowance for the duration of the apprenticeship. Employers who hire a trainee following the apprenticeship receive compensatory payments, since a newly qualified employee is not fully versatile. In 1991 about 600,000 people started an in-service or retraining programme; about 5 % of them were foreign nationals.

The Measures for Social and Vocational Integration of Foreign Youth (MSBE) have been in effect since 1978. Originally they targeted EEC nationals and foreigners from countries where guest workers had been recruited, but since 1987 they have also been applied to German young people that have a weak labour market position. The purpose is to promote integration of young people in the labour market, and especially to increase their chances for admission to regular vocational education or the apprenticeship system. These arrangements subsidize language courses tailored to vocational practice, vocational qualifying courses, and social work guidance for the young people involved. The MSBE programme is funded by the federal Ministry of Labour; it is implemented at the local level in cooperation with schools and other institutions.

The Ministry of Labour has introduced other schemes in addition to the MSBE. Their purpose is to help unskilled young people obtain vocational qualifications. For this group, too, a wide array of general and intensive language courses, literacy courses, and courses for women are available. For hard-to-place young people there are opportunities for traineeships outside firms, intended to make placement possible within one year.

Notwithstanding all such measures, a proportionally greater number of foreign young people fail to find an apprenticeship, and unemployment among this group is also higher. One special problem is that German citizenship is required for apprenticeships or jobs in government service. The term

government service is very broad; it includes, for example, public transport companies and kindergartens.

It must be noted that foreigners' labour market position is no longer so one-sided as when the guest workers first arrived in Germany, when they worked exclusively in unskilled jobs. Increasing numbers of foreigners can now be found in skilled occupations. Interestingly, the rate of trade union membership among foreigners (34 %) is higher than that of German workers. The trade union federation DGB, and the metal workers' union IG Metall in particular, have been very active in the past fifteen years in promoting the interests of foreigners. Foreigners can now vote for and be elected to company councils, which wield a good deal of influence in Germany. In principle they also enjoy full rights to social welfare benefits.

Although foreigners in Germany, as everywhere, experience discrimination in job applications, promotions and dismissals,<sup>8</sup> no specific antidiscrimination legislation exists. A debate is underway, but it is unlikely to lead to legislation in the near future.

## **2.4 France**

For about a hundred years, France recruited workers and soldiers in neighbouring countries and in its African and Asian colonies. Immigrants were encouraged to assume French nationality, get an education, serve in the military, and become part of societal institutions like trade unions, churches and political parties. In particular instances policy was directed at housing, education, employment and legal status, but such measures never acquired an important place in the whole of government policy, and they were seldom cohesive.

### ***Strengthening of legal status and integration***

After the 1974 immigration curbs, emphasis shifted to restrictive admission, curtailing illegal immigration, and encouraging the remigration of unemployed immigrants. In this period the government presumed that most of the post-war labour immigration would be temporary in nature.

After Mitterand came to power in 1981, major policy changes were effected. The government abandoned the idea of the temporary stay, and considered it crucial that immigrants should incorporate themselves (*s'insérer*)

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<sup>8</sup> See ILO 1995.

into society. The Minister of Social Affairs set out five policy areas : residence rights, employment and vocational training, housing, cultural integration, and participation in social and political life.

In the first half of the 1980s, a number of key measures were promulgated to strengthen the legal position of immigrants. The automatically renewable ten-year residence permit (the 'ten-year card') was introduced. It entitled all legal immigrants to permanent residence and provided them more protection against expulsion. The card put an end to the previous system with separate residence and work permits. Card holders were given free access to the labour market.

Alongside its general policies for problem groups in the educational system, the social affairs ministry supported a range of out-of-school activities to address problems faced by young immigrants. In four years' time it also shut down the bulk of the temporary lodgings and spent over 6 billion francs on housing construction.

The government also spent millions in support of sociocultural activities organized by hundreds of immigrant associations, which were mostly cultural in nature. The minister insisted on strict observance of the separation of church and state. Immigrants acquired the right to set up their own organizations, and the full right to serve as union representatives and officials. The requirement to speak French in company council meetings was scrapped. Voting rights for representative bodies outside firms were still reserved for persons holding French nationality. The term *insérer* is not really defined in policy documents. It appears to replace and slightly broaden the notion of assimilation, since 'incorporation' leaves some room for the various immigrant groups to preserve a distinctive character. Later in academic and political circles '*insertion*' came to be used polemically vis à vis '*intégration*'.

### ***National institutions***

The government also reformed several bodies which implement or support various facets of immigrant policy. It democratized the executive structure of the Social Welfare Fund for Immigrant Workers (FAS). The FAS provides financial support to government programmes in education, culture, and labour market integration, and to private organizations for social and cultural projects. Its annual budget is around 1.5 billion francs. In the years between 1981 and 1994, it spent from 31 % to 45 % of its budget on housing, 18 % to 24 % on language acquisition and vocational training, 19 % to 39 %

on social education and cultural activities, and 1 % to 7 % on labour market reentry.

In 1984 the National Council on Immigrant Populations (CNPI) was created to supersede the National Commission on Foreign Workers. The CNPI is an advisory body to all ministries charged with immigrant affairs. In most cases that is the Ministry of Social Affairs (which has undergone frequent name changes). Within this ministry, the Population and Migration Division (DPM) holds chief responsibility for immigrant policy. The CNPI formulates recommendations, either on request or on its own initiative, pertaining to housing and working conditions, education, training, and cultural and social matters relating to immigrants. Organized labour and industry, immigrants, ministries, and official institutions such as the FAS and the Office of International Migration (OMI) are represented in the CNPI. The OMI is the body that previously organized the recruitment of foreign labour; after the immigration curbs it was assigned numerous other tasks, such as remigration and French expatriates.

In 1990, the premier instituted the High Council on Integration for a three-year period, and it was extended for three more years in 1993. It is composed of ten highly placed, independent individuals, and it advises the premier on immigrant integration. In six years' time it produced thoroughgoing reports and made many policy recommendations. It has played a key opinion-making role in societal and political debates.

The National Advisory Commission on Human Rights, founded in 1947, has been publishing an annual report since 1989 on the enforcement of anti-discrimination legislation and on developments in society relating to racism, discrimination and anti-semitism. It falls under the premier and is composed of representatives of nine ministries, the two chambers of Parliament, the Council of State and the judiciary, as well as representatives of organizations, trade unions, churches, the legal profession and the academic world.

### ***General and target group policy***

Nationality legislation forms the core of integration policy. The prevailing philosophy is that immigrants need to take on French nationality in order to integrate. Naturalization is a means to integration and not the crowning touch as in Germany. In taking on French nationality, immigrants have the same rights and obligations as all other citizens, and they may take part in political and societal institutions. Government policies in areas such as education, culture, housing and the labour market thus apply to them in

principle. Persons originating from French Overseas Departments (DOM) and Territories (TOM) hold French nationality. Those from former French colonies occupy a special position among the immigrants for varying lengths of time (for example with regard to naturalization, family reunification and employment). EU nationals have been given the same rights as French people in numerous areas.

All citizens have the right to education, and the educational system is geared to removing social and cultural differences. As former minister Simone Veil was fond of saying, the school is the French melting pot. Special programmes are developed for children who cannot keep up, hence also for immigrant children. In the early 1980s the chosen method was to set up institutions to deal with certain generally defined problems. One result of this was the so-called priority education zones. Thirty per cent of the children in such a zone had to be of foreign origin. Additional teachers and funding were allotted for 'educational action projects', and special agencies were set up to tackle the educational problems of immigrant children. Other programmes concentrated on French language acquisition, organizing remedial courses and extracurricular educational activities, or setting up libraries and documentation centres. The FAS contributed to the funding of such programmes.

A similar procedure was followed in other areas, such as employment (see below) and urban development. Many of the initiatives in the latter area arose after outbreaks of violence by immigrant youth in suburban housing estates. The disintegration of urban neighbourhoods is a recurrent topic in political discourse. Evidently this is the issue French politicians are using to prove that minorities policies as applied in the United States, Britain and the Netherlands do not work. All problems are defined in general terms – social exclusion, public safety, unemployment, deterioration of social cohesion – or in veiled language, such as 'loss of urban diversity'. The message is that there are no immigrant ghettos. General measures are taken, for instance, to revitalize urban economies, ensure safe streets, improve education and fight unemployment. The *seventy* measures announced are being paid for from general public revenues. The FAS is involved only in the partial funding of school projects.

In practice, the general policies have left room for specific measures to help immigrants. When these were taken, no distinctions of ethnic origin were made. Such opportunities appear to be diminishing in recent years. The latest urban revitalization plan (1996), for instance, makes no mention of the word 'immigrant'. The preference for general policies above target group immigrant policies derives not only from the French notion of integration (see below).

Another key factor is the belief – or fear – in successive governments and in organizations in society that policies which specifically target immigrants will fan the aversion to immigrants among French people. That would play into the hands of right-wing extremists.

### ***Integration concept***

French immigration policy is generally characterized as assimilationist. It is based on the republican thinking that goes back to the French Revolution. This sees the state as constituted by the will and consent of free citizens. Thus, it is not constituted by people who can claim the same ethnic ancestry, nor by people who claim to be part of some ethnic group or minority. The rights of individual citizens are laid down in the French Declaration of the Rights of Man. They apply to every citizen, and every citizen can exercise them. Viewed in this way, citizenship and nationality are one and the same, and are inseparably entwined.

No one in France can invoke the status of belonging to a minority, immigrants included. The Republic is one and indivisible, and that is why the constitution prohibits the recognition of minorities. This is also why France lodged a reservation to Article 27 of the International Covenant on Civil and Political Rights, which protects the rights of minorities to practise their own culture and religion and use their own language. In the French view this is tantamount to *recognizing* minorities. Individual citizens, and not minorities, hold the rights laid down in the Article. In terms of policy, the formation of ‘minorities’ is seen as the failure of integration. Individuals fail to be absorbed into society on account of certain characteristics such as national origin or skin colour, or they make such entry impossible by permanently clinging to those characteristics. This leads to segregation and social disintegration.

The terms used to describe immigrant policy are less clear-cut. French society and culture put assimilation first, and immigrants are expected to conform. Though the word *assimilation* is decreasingly heard, for many it is still the goal of integration. The term *insertion* reflects the conditions under which society receives the immigrants, leaving them a certain amount of room for distinctiveness and traditions. This word was used in the early 1980s, when policy implied the acknowledgement that immigrants were there to stay. Their rights as immigrants needed to be recognized and defended. More recently the concept of *intégration* is used. In the first place integration carries a general meaning – the social context. Beyond that, it refers to the gradual process of full participation by immigrants in society. In that society some measure of

social, cultural and moral diversity exists, but it is held together (integrated) by the principle of equality.

### ***National consensus***

The republican conception of the state and the corresponding conception of integration are shared by virtually all political parties and by most organizations and immigrants in society. However, there are republican standpoints and there are ultrarepublican standpoints. The modest differences between the two positions involve the amount of cultural diversity they are willing to acknowledge and appreciate. For the ‘conservatives’, French culture is the expression of universal values, and French citizens participate in and develop that culture. If French people hold other cultural values alongside the universal ones, that is their own personal affair and not that of the French state. The ‘liberals’ share this universalistic conception of the state, but from a more society-oriented viewpoint they have a certain appreciation of different cultures and subcultures coexisting in one country.

This national consensus as well as the ideological shades of meaning clearly manifested themselves in the hearings held by the Nationality Commission, instituted in 1987 by the Jacques Chirac, then premier. The commission went on to draw up proposals to make it easier to obtain French nationality – the essential step to integration. These were expressly intended to reconfirm republican values.

### ***Integration and the labour market***

Integration in the labour market has an essential place in immigrant policy. Special instruments are developed within general policy on employment which target immigrants (foreign workers and their families). Almost without exception, however, they make no official distinction on the basis of ethnic or national origin, but only on age and gender. Immigrant integration is to be promoted through general policy and the institutions of ordinary law (*de droit commun*). Organizations such as the FAS are to guide this process with measures to ensure that immigrants benefit from general policy and gain access to general institutions.

Any target group measures usually concentrate on literacy, French language acquisition, and general education preparatory to vocational training. In the implementation of the latter, distinctions are made on the basis of region

of origin (Maghreb or West Africa). These activities are financed in part by the FAS (240 francs in 1994).

A series of general measures were implemented in the early 1980s to stimulate the integration of young people into the labour market. These made vocational education more accessible to people aged 16 to 26, improved training courses and organized traineeships. The generalized approach was expressly chosen to avoid isolating immigrant young people, but their participation remained low. Traineeship contracts averaging two years were negotiated with employers, who were exempted from social security charges. In 1991, 4.5 % of the 130,000 contracts were for immigrant youth. In the same year, public and private sector employers signed 400,000 similar contracts with poorly skilled workers, committing themselves to provide training; 20,000 were with immigrant young people. In other general measures, too, immigrants remained underrepresented, even though their labour market situation is worse and their vocational qualifications lower than those of French people. Some improvement in their involvement in traineeships was noted in 1994, when they held over 18 % of the 38,000 contracts. However, in those types of contracts with the best employment prospects, they again were underrepresented. In 1993-94 an experimental project was set up for unskilled young people of foreign origin living in older districts. They received guidance from 'sponsors' (*parrains*) while looking for work and for some time after finding it. A total of 990 young people took part, and the project cost approximately one million francs. The experiment was expanded in 1994-95 into a programme in ten regions with about 70 projects. They were extended and expanded in 1995, and four new regions were added. At present there are 140 projects involving 6000 youngsters and 1400 sponsors.

Urban policy is a high-priority issue in politics. Its aim is to bring about greater equality between citizens in their access to the labour and housing markets and public services. It tries to repair disintegrating social ties and resist the fragmentation of cities into isolated neighbourhoods. Supplementary measures can be taken to ensure that immigrants gain their rightful place in policy. When general 'city challenge' contracts (*contrats de ville*) are concluded between national and local authorities, the FAS can provide funding for immigrant projects. It also has the power to nullify geographical boundaries in original contracts where these exclude immigrants from participation. It negotiated such supplementary contracts in 160 of the 210 city contracts in 1994. In areas where no city contract is in effect, local authorities can sign a different type of contract, a *contrat d'agglomération*, aimed at the local integration of immigrants. The Ministry of Social Affairs makes funding

available for projects that improve immigrants' access to general programmes. It concluded 53 such contracts in 1994. At the beginning of 1996 the government breathed new life into urban policy with a series of general policy proposals to combat unemployment, social breakdown and exclusion, and juvenile delinquency. One proposal was to investigate whether affirmative action could benefit persons from bad neighbourhoods (*quartiers difficiles*) within general projects that help integrate the youth and the unemployed into the labour market.

## **2.5 Great Britain**

British notions about immigration and integration cannot be viewed in isolation from the history of the British Commonwealth. This commonwealth of nations was conceived as the successor to the British Empire. It was headed by the British Crown, and all subjects of Commonwealth nations were to have free entry to Great Britain. Under the British Nationality Act of 1948, all subjects of Commonwealth countries would become British subjects as soon as they stepped ashore in Britain. This fact has governed British immigration policy.

### ***Admission policy and integration***

Post-war immigration consisted of European refugees, many of them Poles, and of Commonwealth subjects. The latter group was by far in the majority. As time passed, the admission of this category of persons was progressively restricted by changes to the nationality legislation.

As in other European countries, immigration was stimulated in the 1950s and 1960s by firms that needed cheap labour. In contrast to other countries in Western Europe, the authorities and immigrants in Britain acted far less on the assumption that the immigrants would return to their countries of origin as soon as their employers no longer needed them. Forced repatriation was out of the question, since they held British passports. Even so, Britain never saw itself as an immigration country. Since the Second World War *emigration* has in fact been greater than immigration. It was mainly in the direction of Commonwealth countries and the United States.

That immigration would be a source of problems became clear when rioting broke out in 1958 in Nottingham and in Notting Hill Gate, a London neighbourhood populated by black immigrants. Rising unemployment and the pressure of public opinion forced the government in the early 1960s to take steps to control immigration, which was still entirely free to all

Commonwealth subjects. The 1962 Commonwealth Immigrants Act was a compromise which tried to link immigration to the needs of labour market by setting a quota for labour permits. The law was justified with references to race relations, problems with integration, growing unemployment and the risk of overpopulation. Following the decolonization of East Africa and subsequent actions by the new African leaders, Asians holding British passports felt compelled to migrate to Britain. When 4,000 Asians arrived within two months in 1967, a campaign to curb immigration was unleashed, led by the Conservative politician Enoch Powell. The Labour government gave in to the pressure in 1968 and enacted the second Commonwealth Immigrants Act. It introduced the distinction between British passport holders with a parent or grandparent born in Britain and other Commonwealth subjects without such ancestry. Only the former category retained the right to enter Britain and take up residence. The effect of this measure was that non-white residents of African, Asian and Caribbean countries were denied entry to Britain, while white people from Australia and Canada, most of whom satisfied the requirement, encountered few problems.

Also in the 1960s, the first statutory measures against racial discrimination were introduced (in 1965 and 1968). Coming as it did in the wake of measures to curb non-white immigration, which were regarded as racist, this legislation was viewed by representatives of the non-white community as a sort of payoff – especially when the anti-discrimination measures proved to have little effect in the beginning.

Conservative governments continued this trend throughout the 1970s and 1980s. Immigration of non-white Commonwealth subjects became virtually impossible, and the last of the provisions favouring other Commonwealth subjects were removed in 1983.

### *National institutions*

Immigrant policy is carried out by the Home Office. This means that policies on admission, residence, nationality and anti-discrimination are all concentrated in one ministry.

A key institution that falls under the Home Office – but which, as a statutory institution, is independent of it – is the Commission for Racial Equality (CRE). It is empowered to investigate racial discrimination, provides legal aid to victims of it, distributes subsidies to local organizations, and advises the government. It has set up a network of Racial Equality Councils (RECs).

### ***Policies on deprivation and target groups***

Because immigrants are legally British nationals it has always gone without saying that they were to be treated equally. In the 1950s immigration seemed to be proceeding with few problems. There was work for everyone, the immigrants came from countries whose cultures were dominated by British colonial administrations, and the special ties with the Commonwealth were expressed in the free movement of persons between member countries.

In the 1960s the picture began to change as a consequence of rising unemployment, problems in the educational system, racial tensions and the forming of immigrant neighbourhoods. In response to this, the government decided to curb immigration – defending this as a measure to improve race relations – and drew up legislation to prevent unequal treatment on grounds of race. Initially this ideology of equality also made it harder to take measures to improve the social position of ethnic minorities, since this would be at odds with the principle that all Britons were equal before the law regardless of skin colour. However, in the late 1960s the Labour government did introduce several measures that specifically targeted minorities. In 1967 it began developing an Urban Programme, the purpose of which was to tackle problems in urban neighbourhoods with high minority concentrations. The policy was emphatically intended for the neighbourhoods as a whole and not just for the minorities living there. Labour did hope that deprived minorities would benefit from it, but presented it in more universal terms for fear of losing votes to the anti-immigrant National Front, which appeared to be gaining strength in the late 1960s. These Urban Programmes, later called Inner City Policies, were gradually halted after 1979, when the Conservatives came to power.

Another example of an immigrant-specific measure drawn up by Labour was Section 11 of the Local Government Act 1966. It permitted local authorities to claim additional wage costs arising from the presence of substantial numbers of Commonwealth immigrants whose language and customs differed from those of the local community. Section 11 was an open-ended arrangement, and in theory it could be used for all sorts of purposes. Local authorities were required to consult with local minorities before applying for such funds. The clause touched off severe criticism and heated debates. Conservatives accused some Labour councils of misusing the open-ended arrangements. The measure was also criticized because it specially targeted ethnic minorities. These critics argued that the problems of ethnic minorities are basically no different from those of unemployed, badly housed whites. Such problems should therefore not be solved with special programmes, but with generalized schemes which ethnic minorities could

make more use of given their disadvantage in the housing and labour markets. A second current in the debate emphasized the differences between ethnic minorities and the white majority, and stressed the importance of groups maintaining their customs. A third current argued that the damage done by racism created specific needs that could be addressed by Section 11.

The clause was originally intended for the reception of immigrants into British society, and some critics alleged it had been intended to assimilate them. In the 1980s, when more ethnic minority town council members had been elected who needed to show their supporters they were acting on their behalf, Section 11 budgets came to be used increasingly for minority organizations, and the spending was justified locally by pointing to the need for a pluralistic community. Various analyses have shown that the bulk of the funds were used to pay teaching staff, and evaluations have also revealed that they were used to compensate for general cuts to education and other budgets. The Home Office issued circulars which gradually restricted the use of Section 11.

Since the Conservatives have been in power, there is no longer much evidence of general policies against deprivation. Disparities between rich and poor and between growth and non-growth areas are accepted as normal by the government. Some Labour-dominated local authorities attempted to introduce policies to relieve deprivation, but the government put a stop to them. In some sense the existing anti-discrimination legislation may be regarded as target group policy. At first it only applied to ethnic minorities with British citizenship, but since 1976 discrimination on grounds of nationality has also been prohibited.

Because Great Britain was confronted much earlier than other European countries with race riots and racial discrimination, it also attempted much earlier to fight discrimination by means of legislation. The first Race Relations Act dates from 1965 and was not very effective. The Race Relations Board, charged with enforcement, had few powers, and the law applied only to public venues such as swimming pools and hotels. It also prohibited incitement to racial hatred. The law that succeeded it in 1968 was enacted after heavy pressure by minority organizations and the left-wing of the governing Labour party. This law also banned discrimination in housing and employment and in the provision of goods and services. The debate at the time was influenced by the course of events in the United States, where the civil rights movement had won passage of far more drastic measures requiring large firms and public authorities to observe quotas in their staffing policies. British legislation never went that far, but criticism of the effectiveness of the Race Relations Board did lead to further tightening in the 1970s.

The Race Relations Act 1976 created a new body, the Commission for Racial Equality (CRE), with more powers than its predecessor. It had the right to conduct formal investigations. The Act prohibited indirect discrimination on grounds of nationality, and it made affirmative action possible. Individuals were entitled to take legal action with the aid of the CRE. The CRE also continued the task of its predecessor to advise the government on all matters of race relations, and the task of distributing subsidies to local organizations. The latter activity has made it very vulnerable to criticism from minority organizations. Its advisory role was also a thankless task, since Conservative governments were not inclined to cooperate by making legislative improvements that the CRE considered necessary.

The Race Relations Act 1976 and the CRE's activities have resulted in a whole body of legal knowledge on the subject of discrimination. Victims of discrimination in dismissal from jobs, refusal of promotion, or failure to hire have brought successful actions. Courts have awarded relatively high damages. The Act has also been effective in a preventative sense. Firms adopted anti-discriminatory behavioural codes to secure the certificate of Equal Opportunity Employer. The CRE has played an active part in drawing up such codes, a sort of semi-statutory arrangements confirmed by Parliament. One result is that personnel officials have become well aware of the many forms of direct and indirect discrimination that can occur at the workplace.

The Race Relations Act and the CRE have not succeeded in averting race riots in Britain. Disorders in Brixton led to an inquiry led by Lord Scarman. His report<sup>9</sup> has been of great influence on the British race relations debate. It has stimulated police and local authorities to take more affirmative action within their own organizations. The persistent economic malaise and the resulting unemployment and urban decay served to marginalize large groups of ethnic minority young people in the course of the 1980s.

The de facto segregation on the housing market has given rise to 'black' neighbourhoods with their own subcultures. Because the government exercises little control over the housing market, and because policy is based on a presumed therapeutic effect of the market, no effectual policy exists to discourage discrimination. Churches, volunteer organizations and some local authorities are attempting to stop the decay in selected neighbourhoods by setting up so-called Inner Cities Projects.

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<sup>9</sup> HMSO 1981.

### *Integration concept*

Initially the discussion about immigration and integration was closely linked to that about decolonization, the special relationship with Commonwealth countries, and the rights that people from present or former Commonwealth countries had or should have in Britain. In contrast to countries on the Continent, there has been little discussion about whether immigrants should be treated equally.<sup>10</sup> After all, the immigrants were British, and those who did not have British nationality could obtain it fairly easily in a simple naturalization procedure. A political consensus has existed since the early 1960s that a restrictive admission policy is a precondition for integration. In the political debate, the terms *integration*, *absorption* and *assimilation* seem to alternate. Since the late 1960s the notion of *race relations* has become dominant, though it is used in many different ways. 'Good race relations' means that people peacefully live together on the basis of tolerance, diversity and pluralism. Consensus on this point exists between the Conservatives and Labour, in line with their shared beliefs about religious freedom and with the British colonial experience and practice.

The notion of *ethnic minorities* has entered the political debate through scholarly research, and it has gradually replaced the term *immigrants*. This is logical in the light of the restrictive admission policies which have practically brought immigration to a standstill.

In scholarly circles and ethnic minority communities, vehement debates raged in the 1970s and 1980s about the concepts of *race* and *class* and the interrelationship between them. The debates led the radical black intelligentsia to seek contact with Labour and the trade union movement and to form black caucuses within them. The term *black* in these circles is not defined anthropologically, but has a political meaning. It is tied to oppression. In this perception the liberation of blackness can only be achieved through black organizations. The origin of racism among whites is said to lie in the colonial past. The official race relations policy is rejected as not going far enough. The left wing of the Labour Party has endorsed these theories in part, and in some local councils it has tried to put them into practice, particularly in education. Because of the backlash this has provoked and because of the weakened influence of the left wing within Labour, these radical ideas have little chance of acceptance in wider circles in the 1990s.

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<sup>10</sup> Weil and Crowley (1994) and Entzinger (1994) maintain that there has been little theorizing in Britain about integration.

The Conservatives acknowledge the existence of racism. They view it as an individual issue, not an institutional one. According to this viewpoint, individuals who have been affected by racism should claim their rights through the Race Relations Act. Basically, the Conservatives apply an individual assimilation model. They are confirmed in their standpoint by successful entrepreneurs of Asian origin who have joined the Conservative Party. Seen from this angle, the Race Relations Act needs no improvement.

All things considered, British integration policy is predominantly pragmatic, and is more the product of incidents and ad-hoc measures than of any all-embracing conception of integration.

### ***Integration and the labour market***

Much has been done to combat discrimination in the British labour market. Notions such as *indirect discrimination* began developing much earlier in Britain and in other European countries. It is partly due to American influence that ideas such as *affirmative action* have gained acceptance in the debate. Legislation is in place that explicitly allows it. The national government has never imposed an affirmative action plan on itself, however.

Such plans have been implemented at the local level, mainly in councils where Labour was in power. One of the best known examples is that of the Greater London Council, an authority later abolished by the Thatcher government, partly because of the Labour influence there. One result of the 1981 Scarman recommendations on the causes of the Brixton race riots was that police forces have made serious efforts to recruit ethnic minorities.

Organizations of British employers have generally adopted a more charitable attitude towards affirmative action than most of their Continental counterparts. Some large firms have explicit affirmative action policies. Registration of ethnicity has never been the subject of heated debates as it has in a country like the Netherlands. The need for registration in the interest of affirmative action is widely acknowledged.

The notion of *contract compliance* has also been applied on a modest scale at the local level. It means that firms can be awarded public contracts only if they show they are Equal Opportunity Employers. The Thatcher government opposed this practice and attempted to end it by amending the Local Government Act. This did not succeed, however, because the Confederation of British Industries (CBI), the umbrella organization of employers, announced it had no objection to it as long as it was limited to racial equality. Some councils had also applied such measures for entirely

different purposes, such as boycotting firms who did business with South Africa.

Despite all these measures, unemployment among ethnic minorities in Britain is significantly higher than among whites. The virtually permanent economic malaise forms a poor basis for a successful campaign against minority unemployment. After every race riot of any size, there are appeals in the media for more effective employment policies in minority neighbourhoods. In practice, however, both the Labour and Conservative parties shrink back from any measures that might spark resentment among white voters.

## **2.6 The Netherlands**

In the 1970s it began to dawn that the immigration from the Mediterranean area was to have permanent consequences for Dutch society. This was evident in the reactions inside and outside Parliament to the *Memorandum on Foreign Workers*, published by government in 1970. The sharp rise in immigration from Surinam before decolonization in 1975 further increased the need for a well-coordinated policy on immigrants. Train hijackings by Moluccan youths in the mid-1970s left deep impressions at home and abroad. Public opinion and the responsible politicians realized that after a generation little had come of the integration of Moluccan young people, the large majority of whom had been born and bred in the Netherlands.

### ***Restricted admission and minorities policy***

The report entitled *Ethnic Minorities* by the Advisory Council on Government Policy (WRR) in 1979 and the *Government Reply Memorandum* in 1980 mark the turning point in policy. Although the Dutch government continues to deny right up to the present day that the Netherlands is an immigration country, it has assumed since 1980 that the vast majority of the immigrants were there to stay. This led it to conclude that a minorities policy was needed, whose goal would be integration with preservation of cultural identity. It later moderated these ambitions in its 1983 *Minorities Memorandum*, after the policy had already been adopted by many local authorities. At that time, the policy targeted legally resident members of minority groups. These included Moluccans, people of Surinamese and Dutch Antillean origin, foreign workers and their family members from the recruitment countries, Romany, refugees, and caravan dwellers.

Minorities policy concentrated on alleviating deficiencies in education, housing, employment, well-being and health. It was to equalize the legal position of ethnic minorities wherever possible, combat discrimination, and encourage emancipation and participation in society. The criticism by minority organizations can be summarized in the phrase 'many words, few deeds'. Nevertheless, minorities policy and the accompanying notion of equal treatment have since helped to improve the legal position, political participation and housing of minorities, and to strengthen anti-discrimination efforts. In education and employment, however, the results have been unsatisfying. When unemployment among minorities began to rise much faster than that of the ethnic Dutch population, policy attention shifted to the labour market. A report entitled *A Fair Chance*, prepared by the Minorities Research Advisory Committee (ACOM) in 1986, argued for affirmative action programmes modelled on those in the United States. Such programmes are now in place for employment in the national government, some local authorities and a few police forces. Trade and industry have managed to avoid any kind of obligation.

In 1987 the government commissioned new recommendations from the WRR, and they were made two years later in a report entitled *Alloctonenbeleid* (Ethnic Minority Policy). By the term *alloctonen* (literally 'non-indigenous people') the WRR understood various categories of people of non-Dutch origin: aliens, former aliens who had been naturalized, ethnic Dutch people from present or former overseas territories, and descendants of all these groups down to the third generation if they regard themselves as non-indigenous. A *minority* was a non-indigenous group in an inferior position. The report urged priority attention to employment, children's and adult education, and further improvement of legal status. The term *alloctonen* has been subject to criticism and has never gained acceptance from provincial and local authorities. In the 1994 policy paper *Contours Memorandum*, the national authorities finally rejected the word as an official term.

In the early 1990s the terms *inburgering* (adaptation, integration) and *nieuwkomers* appeared on the scene. In its *memorandum Outlines for the Newcomers' Integration Bill* (1996), the government wrote that integration requires that newcomers rapidly learn to independently find their own place in society. Newcomers are people who intend to settle in the Netherlands for an extended period, but EU nationals are excepted from the newcomers policy. Integration is to be achieved by means of an 'integration programme', consisting of courses in Dutch and social and vocational orientation, career planning, social guidance, and assignment to a follow-up course or

organization that can further help the newcomer enter the labour market. The scheme is to be implemented by local authorities.

### ***National institutions***

In the past fifteen years, policy has been coordinated by the Minorities Policy Coordination Department of the Ministry of Home Affairs. In most of the larger local authorities, a member of the municipal executive is charged with local policy on minorities, and is generally supported in this by a coordinating public official. Minorities have a statutory right to participate in public decision-making through advisory bodies reporting to the Minister of Home Affairs. Many local authorities also have public participation procedures.

The promotion of minority interests is in the hands of various national welfare organizations for minorities, which are funded by the Ministry of Health, Welfare and Sport (VWS). Most such organizations combined forces in 1996 in an association known as Forum. Many other organizations founded by minority people are active at national or local levels, and the two Dutch trade union federations actively promote the interests of minorities.

The National Anti-Racism Bureau (LBR) was established in 1985 on the initiative of civil rights lawyers and minority organizations. An Equal Treatment Commission was set up in 1994; members of minority groups can lodge complaints there about discriminatory treatment.

### ***Policies on deprivation and target groups***

The target groups were first defined in 1980 in the government's memorandum of reply to the WRR report, and once again in the 1983 *Minorities Memorandum*. Lengthy discussions were held about whether the right target groups were being chosen, and specifically on whether the Chinese, Pakistanis and Palestinians should not also be designated as target groups. The government declined to do so for both financial and substantive reasons. Later on, the question arose as to whether the Italians, Greeks, Spaniards and Portuguese – all now European Community nationals – should still be targeted by minorities policy. Besides the more fundamental issue of whether EU nationals should be eligible for minorities policies, it was also doubtful whether these particular groups suffered enough deprivation to warrant special attention. The government now plans to exclude EU nationals from its new integration policy for newcomers.

Minorities policy is in large part a policy against deprivation. The authorities have attempted, using target group measures with special budgets, to relieve the inferior position of minorities in the labour market, education, housing and health. The 1983 *Minorities Memorandum* observed that members of minorities with disadvantages in these areas tend to concentrate in neighbourhoods also populated by ethnic Dutch people with similar problems. It designated such neighbourhoods as 'problem cumulation areas', and it announced that policy would target these areas and that the ethnic Dutch people there would also benefit. The policy was no great success. Too many government departments and local authorities were involved, and their diverging interests made it hard to arrive at a coordinated approach. The policy was followed by the Social Regeneration Policy and later by the Cities Policy.

Similar efforts were undertaken in education under the Educational Priority Policy, which allocates extra funding to educational and welfare institutions in designated areas to remedy deficiencies there. Schools with a high percentage of minority children can hire additional teaching staff on the basis of a point system, and ethnic Dutch children at the same schools also benefit. The results have been disappointing so far and it is uncertain whether minorities have profited from the additional funding.

The national authorities have been gradually withdrawing from the public housing sector since 1980, and it is now mainly up to local authorities to prevent deprivation in housing. Countless local authorities and housing associations have applied some sort of dispersal policy, although formally that was not permitted. The WRR reported that in 1989 there was no longer much evidence that minorities suffered deprivation in housing. Since then, however, the LBR and other organizations have shown that Turkish and Moroccan people in particular have to wait longer for the allocation of rental flats than comparable Dutch groups. Minorities have definitely benefited from the many urban renewal projects completed in the past twenty years, mostly in districts with high ethnic minority populations.

A further aim of minorities policy has been to enhance minority participation in society. Compared to other countries, political participation has been a reasonable success since resident aliens gained the right to vote and stand for office in local councils in 1986. This has stimulated both foreign nationals and minority people with Dutch nationality to become actively involved in political parties. Minorities policy is also intended to ensure equal treatment. At the request of the Dutch Centre for Immigrants in the early 1980s, Parliament ordered a review of all statutory provisions that stood in the way of equal treatment for minorities. The resulting research report

*Minderheid - Minder Recht ?* (Minority - Minor Rights ?)<sup>11</sup>, which appeared in 1983, failed to induce immediate government action.

In 1984 a Working Party on Legal Aid in Alien Affairs proposed special legislation on the equal treatment of immigrants, analogous to that applying to women. After lengthy deliberations, an Equal Treatment Act was finally adopted in 1994. It prohibits unequal treatment on grounds of gender, sexual orientation, race and nationality. A similar combined approach to different kinds of discrimination has also been chosen for the Penal Code, in preference to one specifically targeting racial discrimination.

### ***Integration concept***

The conception of integration in the Netherlands has never been very clear. In its first draft of the *Minorities Memorandum* in 1981, the government formulated the goal of integration with preservation of cultural identity. It later modified this goal, but political parties and local authorities have appropriated it more or less indiscriminately. It has never been clear just what was meant by 'cultural identity'. There has been a good deal of debate about the wisdom of having minorities form their own 'pillars', a reference to the traditional denominational divisions in Dutch society. Proponents have pointed to the historical success of the pillarized system in the emancipation of Catholics, evangelical Protestants and workers. Opponents have warned of the danger of isolation and segregation of minorities if they should shut themselves up in their own organizations. The debate has also been carried on at the local level around the issue of subsidies to minority organizations. Many local authorities believed it would further the integration of minorities if they were obliged to turn to general agencies when they needed care and assistance. Moluccans, in particular, have vehemently – and successfully in many cases – opposed this, arguing that only Moluccan institutions can genuinely understand the needs of Moluccan people.

In the 1980s, the terms *pluriform* or *multicultural society* gained currency. The term *intercultural education* is even laid down in the law. Since the early 1990s many agencies have appeared on the market offering courses in intercultural management for businesses and public authorities.

In response to the 1989 WRR report, policy emphasis has now shifted to employment and education, and to the need for proficiency in Dutch. This has

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<sup>11</sup> See Beune & Hessels 1983.

ultimately resulted in the Integration Policy for Newcomers, which requires foreigners to learn Dutch.

### ***Integration and the labour market***

Unemployment in minority groups has been mounting steadily since the late 1970s. Turks and Moroccans in particular had originally been recruited to do unskilled work in the manufacturing industry. That sector suffered heavy setbacks as international competition and automation eliminated many unskilled jobs. Unemployment also increased among the ethnic Dutch in the early 1980s, but among minorities it climbed to three times that of the Dutch. The overall unemployment rate later decreased, but not among the minorities. There are many explanations for this. Employers' organizations point to their poor knowledge of the Dutch language and lack of vocational know-how and skills. Other observers blame discrimination in the hiring and sacking of personnel. A third explanation is that immigration has remained high, despite the tighter restrictions on the admission of family members since the early 1990s.

The 1986 ACOM report *A Fair Chance* sparked a debate on affirmative action as a remedy for the high minority unemployment. As a result of strong resistance from employers' organizations, no statutory requirement for firms to practice affirmative action has ever been adopted. Other obstacles have been the resistance by both employers and employees to ethnicity registration, and the vagueness of the term *minority*. The national government apparatus did commit itself in its scheme Ethnic Minorities Working for the Government (EMO) to have at least 5 % minority employees in its work force by 1995, but not all departments fulfilled their quotas. Many local authorities and police forces have also introduced affirmative action plans, and some have fulfilled them. Beyond the need to reduce minority unemployment, the government has argued that the police and civil service should reflect the ethnic make-up of society. Many semi-governmental institutions have job schemes for minorities. In those covered by the Ministry of Health, Welfare and Sport, some 47 schemes were operative in 1994.<sup>12</sup>

The most successful example was the 1000 Jobs Scheme for Moluccans. Under a comprehensive agreement between the government and representatives of the Moluccan community, the authorities promised to help 1000 Moluccan people find jobs. That commitment was finally fulfilled, if

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<sup>12</sup> See Smeets et al. 1996.

only after a tremendous effort and much external pressure from Moluccan organizations, Parliament and the General Audit Office. By 1992 more than 1200 unemployed Moluccans had found jobs through the scheme.

In the Joint Industrial Labour Council (Stichting voor de Arbeid), employers committed themselves in 1990 to fill 60,000 jobs with members of ethnic minorities. Although the employers' organizations had not the means to make their affiliated firms cooperate, the target figure was nearly attained. Partly as a result of the 1989 WRR report, the government finally proposed the Fair Employment of Ethnic Minorities Bill (WBEAA), which took force in 1994. This law requires firms with more than 35 employees to report to their Chamber of Commerce how many ethnic minority employees they have and what plans they have to increase the percentage. This information is supposed to enable minority organizations and district employment offices to consult with firms to get them to hire more minority people. Fifty management consultants for minorities (BAMers) have been working in conjunction with the employment offices since 1992; their task is to persuade firms of the need to hire minorities.

In addition to these target group measures, the authorities have introduced a large number of generalized measures which are also presumed to benefit ethnic minorities. They are intended to improve education and training or to help the long-term unemployed. The ranks of the unskilled and the unemployed contain disproportionate numbers of ethnic minority people. One such general service is provided by the Vocational Guidance and Training Centres, where it is estimated that half of the course participants are from minorities. Another is the Adult Elementary Vocational Education programme, with about one quarter ethnic minority participants. Unfortunately, not just the participation rate, but also the dropout rate is high among minorities in these types of courses. One further arrangement provides businesses with subsidies and reductions in employers' contributions if they hire long-term unemployed persons. In 1990, 12 % of those hired on the basis of this measure were said to have been from minorities. It is also anticipated that the bulk of the 40,000 reduced-cost jobs now being created by Minister of Social Affairs Melkert, as well as the job opportunities provided by the Guaranteed Youth Employment Scheme (JWG), will benefit minorities, although these are general rather than targeted schemes. There are high expectations with regard to the Integration Policy for Newcomers, whose obligatory vocational training and language courses are designed to better prepare recent immigrants for the demands of the Dutch labour market.

Minorities policy and the equal treatment strategy have not been able to prevent the marginalization of ethnic minorities in Dutch society. Unemployment and crime rates among such groups are an alarming sign of this. The policies have also provoked considerable backlash among ethnic Dutch people who believe that minorities are being given preferential treatment. A further complicating factor for an effective minorities policy in the labour market is the continuing influx of newcomers from abroad.

## 2.7 Conclusions

All five countries we have examined pursue immigrant policies. More than just regulating the residence status of immigrants, the policies try to bring about their integration into society. Policy is aimed predominantly at education, employment and housing.

In the years after the cessation of foreign recruitment in 1973-1974 – often misleadingly called an immigration ban – there was little sign of a policy on immigrants. In France and Germany, and to a lesser extent in Belgium and the Netherlands, emphasis was on the remigration of foreign workers. A period followed in which, to varying degrees, the permanent stay of the immigrants became an explicit assumption underlying policy. This led to a stepwise introduction of measures to strengthen their legal status, a process that went more swiftly in Belgium, France and the Netherlands than in Germany. Britain began to curb immigration earlier than other countries by making changes to its nationality laws. The legal status of immigrants depends on the different types of citizenship applying to people from former colonies. Nationality legislation has been modified at regular intervals.

There is no essential divergence in the goals of policies pursued in the five countries studied. None of the nations regards itself as an immigration country (and all see a halt to immigration as a necessary condition for an effective integration policy). All of them strive to absorb the immigrants now present on a basis of respect for the democratic values and norms in the receiving society. All of them try to do this with some degree of respect for the distinctive cultural character of each immigrant group.

The *terms* in which policy objectives are cast differ from country to country. This is related to the contrasting political and social traditions in the countries in question. Terminological changes have also occurred over the years, but *integration* is the term most commonly used. For a long time it

applied chiefly to the immigrants, but it has gradually taken on the more general meaning of social integration and cohesion.

In all countries, general policies are in place in diverse areas relating to integration. In some cases there are also target group policies for general categories such as women or youth. The general policies are supported by group-specific policies aimed at immigrants, or immigrant women or youth, and these targeted policies are justified on the grounds that immigrants have specific problems or that general policies fail to reach them. Anti-discrimination laws can be seen as a special form of target group immigrant policy. Such legislation is in place in Great Britain and the Netherlands, and in a different form and to a lesser degree in France and Belgium. It applies not only to immigrants, but to all citizens who suffer discrimination because of their ethnic origin or the colour of their skin.

The distinctions made between the various groups of immigrants are more of a legal than a sociological nature. The distinction most commonly made is that between EU nationals, citizens of former colonies, and 'third-country nationals'. EU nationals enjoy rights that third-country nationals do not have, such as free movement across borders and equal treatment under the law. The approximately 5 million migrant EU nationals are officially included in the immigrant policies of all the countries we studied. All countries have, to varying extents, target group policies for the integration of immigrants into the labour market. Their purpose is to strengthen general employment policies and make them accessible to immigrants. Special programmes have been set up to address specific problems of immigrants.

Integration in the labour market forms an essential element of the total integration policy, and its significance is growing. This is because, first, the marginalization of immigrants is closely related to their socioeconomic position; and second, the prevention of social exclusion for either the indigenous or the immigrant population has been given high social and political priority. Much effort is put into vocational training courses and how to make them accessible to immigrants, including women and young people. The barriers created by discrimination and racism are increasingly acknowledged, and Britain leads the way in combating these forces with statutory measures and behavioural codes. Forms of affirmative action are being applied in Britain and the Netherlands, and similar policies are also being considered in the Flemish region of Belgium.

There are differences in the extent of government involvement in immigrant policies. National authorities initiate and coordinate policies, set up official bodies to support their implementation, and assist organizations in

society that campaign for immigrant interests. All the countries studied, with the exception of Great Britain under the Conservatives, are social democracies in which public authorities play an active role in economic and social life. This is why their governments are rather extensively involved in integration policy, while in Britain such involvement is relatively marginal. But the one country is more state-centred than the other. In France, the state and the institutions founded by it play a greater role than in Belgium, Germany or the Netherlands, where political and community organizations promote integration by means of targeted activities financially supported by the state. National authorities are not empowered to act in many matters relating to integration, and that area is widening as a result of administrative decentralization, particularly in France and the Netherlands. In the federal nations Belgium and Germany, the Regions and Communities or the *Länder* hold extensive powers in this area. That explains the sometimes wide variations in policy, both in theory and in practice.

In addition to the variations in how closely public authorities are involved in integration policy, there are also differences in the *content* of policy. These can be summarized in a few concepts. In France and Great Britain, *nationality legislation* and *citizenship* occupy a prominent place. Whereas in France the state is expected to guarantee *equal rights* for all citizens, in Britain it is to ensure that they have *equal chances*. In the welfare states Belgium, the Netherlands and Germany, emphasis is on the *incorporation* of immigrants into that welfare state, although in Germany this is mostly limited to *equal social rights*. Belgium has also relaxed its nationality legislation, and the Netherlands has facilitated immigrant political participation at the local level.

Britain, the Netherlands and Flanders speak of *ethnic* or *cultural minorities*, while France, Germany and Wallonia carefully avoid that term. This can be traced to differences in the political philosophies and ideologies prevailing there, which have consequences for policy (*ethnic monitoring*, *affirmative action*, etc). There also seems to be a connection between the use of the term *minorities* and whether or not the society is called *multicultural*.

In academic circles, the differences are often articulated in terms of integration models (*group vs individual approach*; *accommodationist vs laissez-faire approach*). International policymakers tend to make much of such national differences. In practice they are smaller. It therefore seems better to describe them as different *relationships* between general policy, intended to relieve deprivation or promote integration, and targeted policies for specific groups. Another factor is the *wording* of policy.

### ***The relationship between general and target group policy***

Whatever its philosophy or ideology, each country had its own policy against deprivation and its own integration policy. Each government tries to find a practical balance, which can vary between different areas of policy.

France and Wallonia give preference to general policy supplemented by target group measures in narrowly defined subsectors of policy. The Netherlands, Flanders and Germany take a more targeted approach within a general policy, with the aim of integrating immigrants into the arrangements of the welfare state. In Britain one can observe a comparative lack of government intervention alongside an emphasis on group identity. It would be interesting to investigate whether the emphasis on minority identity helps to compensate for a inadequately functioning welfare state.

### ***The wording of policy***

In some cases general policy measures are propagated, but in their implementation it is almost statistically certain they will reach immigrants. The finest example is the French urban policy aimed at the youth as a general category, but which more specifically targets young people in 'difficult neighbourhoods' – where immigrants live. The differences between countries derive not only from philosophy or ideology, but also from developments in society which policy tries to respond to. Policymakers are constantly seeking a balance. Because developments in the five countries do not run parallel, different balances are being found. This reinforces the impression many people have that the philosophical or ideological differences between the countries are great.

If anything, the countries appear to be converging. Belgium, Germany and the Netherlands are putting more emphasis on general policy, and France does so even more than previously. This is partly because special attention to immigrants provokes backlash (the preferential treatment issue) and plays into the hands of right-wing extremists. The increasing unemployment and impoverishment in many cities have given integration a more general social meaning. On the other hand, Wallonia has created some room for target group policies, and in France 'positive discrimination' is being cautiously introduced, provided it is confined to the youth in 'bad neighbourhoods'.

Policymakers have been forced to recognize that more is needed than just general policy supplemented by sporadic target group measures. Such shifts in accent can be explained by the shared perception that the actual integration of immigrants has lagged far behind the goals and ideals of policy. That is why politicians and policymakers are in search of new approaches.

## **Important literature by country**

### *Belgium*

Blommaert & Verschueren 1994; Centrum voor Gelijkheid van Kansen en voor Racismebestrijding 1994 and 1995; Cuipers 1993; Jansen 1996; Kamer van Volksvertegenwoordigers 1984; KCM 1989 and 1993; Kruyt & Niessen 1996; Martiniello 1995; Villan 1996; Vlaamse Gemeenschap 1993 and 1995.

### *Germany*

Albrecht 1976; Bämmel & Sen 1986; Barwig 1991 and 1994; Beauftragte der Bundesregierung für die Belange der Ausländer 1993a, 1993b, 1994 and 1995; Beauftragte der Bundesregierung für die Integration der ausländischen Arbeitnehmer und ihrer Familienangehörigen 1988; Körner & Mehrländer 1986; Mehrländer 1995; Rittstieg 1995; Rittstieg & Rowe 1992; Schultze 1994a and 1994b; Schwerdtfeger 1980; Sieveking 1987, 1988, 1989a, 1989b, 1990, 1991, 1992, 1993 and 1994; Thränhardt 1994a and 1994b; Werner & Seifert 1994; Wolf 1991.

### *Great Britain*

Costa-Lascoux & Weil 1992; CRE 1983, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992a, 1992b, 1993 and 1994; Dummet & Nicol 1990; Entzinger 1994; Immigration and Nationality Department 1993; Johnson et al. 1989; Robson 1986; Runnymede Trust 1979; Thränhardt 1992; Weil & Crowley 1994.

### *France*

Bayade et al. 1995; Charmes 1992; Commission de la Nationalité 1988; Costa-Lascoux 1989; Haut Conseil à l'Intégration 1993; Lebon 1994; Ministère des Affaires Sociales et de la Solidarité Nationale 1986; Ministère de l'Aménagement du Territoire 1996; Voisard & DuCastelle 1990; Weil 1991; Werner 1994.

### *Netherlands*

ACOM 1986; Buijs & Rath 1986; Heijs 1995; Ministerie van Binnenlandse Zaken 1981 and 1983; WRR 1989. Much use was made of the LBR-Bulletin (Landelijk Bureau Racismebestrijding), vols. 1985-1992, and of parliamentary documents relating to the *Ontwerp-Minderhedennota* (1981) and the *Minderhedennota* (1983).



#### 3.1 Introduction

In this chapter we will examine the policies of a number of European countries regarding immigrant minority language instruction in primary and secondary education. The cross-national terminology for this type of instruction is subject to both variation and change, as reflected in designations like *home language instruction*, *instruction in the native language and culture*, *instruction in immigrant languages* or *instruction in ethnic minority languages*. We will use the acronym IMLI (Immigrant Minority Language Instruction) when referring to this type of instruction in the countries under consideration. The decision to use the designation IMLI is motivated by a broad definition of potential target groups. Through intergenerational processes of language shift, the status of an immigrant minority language as the ‘native’ or home language can change. Moreover, in secondary education, both minority and majority pupils are often de jure (although seldom de facto) admitted to IMLI (in the Netherlands, e.g., Turkish is a secondary school subject called ‘Turkish’ rather than ‘native language instruction’; see also the concept of *Enseignement des Langues et Cultures d'Origine* vs *Enseignement des Langues Vivantes* in the section on France).

The extent to which IMLI is a topic in government policy with European dimensions can be gathered from estimates of the number of foreign resident groups in the countries of the European Union (see the introductory chapter of this publication). These estimates are based on the conservative nationality criterion. The largest groups, each with more than two million speakers, are the Turkish and Maghreb communities (members of the Maghreb community originate from Morocco, Algeria, or Tunisia). Within the EU, most Turks live in Germany, and most Moroccans in France. For both communities, the Netherlands is the EU country where the second largest groups have settled. As a result of processes of migration and the forming of ethnic minorities,

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<sup>13</sup> We want to thank Carine Denissen and Marianne Sanders for their support in the editing of this text.

immigrant languages like Turkish and Arabic have acquired greater significance in the European context, when measured by the sizes of the respective groups, than have indigenous or regional minority languages like Basque, Welsh, or Frisian.

For various reasons, the development of a government policy regarding IMLI was, and continues to be, a complex and challenging task. In view of the multicultural composition of many schools, this task involves the organization of multilingual rather than bilingual instruction. Experiences with, and the results of research into, an exclusively bilingual context are therefore only transferable to a limited degree. In addition, there are big differences as to the nature and extent of bilingualism of immigrant minority pupils, both within and across different language groups. Moreover, from an intergenerational perspective, these differences tend to increase and shift in the direction of the dominant language of the country of residence. Furthermore, given the very divergent target groups, it is no easy task to fit IMLI into the rest of the curriculum. In a number of countries, the current policy is two-pronged in the sense that, for some groups, IMLI is an addition to the curriculum, while for others IMLI replaces a part of the curriculum. Finally, there is the question of feasibility in the case of a relatively modest demand for instruction and of relatively small or widely scattered groups.

The cross-national comparison between countries in this chapter is based on secondary analyses of the available literature and on oral or written information supplied by key informants. For each country, there will be a context-bound introduction, followed by a discussion of three key dimensions of IMLI, namely, arguments and objectives, target groups and enrolment, and implementation and organization. Finally, in contrast to the other chapters in this publication, Sweden is included in the comparison of countries. From a historical and cross-national viewpoint, Sweden has been quite active in the field of IMLI on the basis of a relatively strongly decentralized government policy, culminating in the Home Language Reform which was passed by the Swedish Parliament in 1976.

### **3.2 Belgium**

Belgium is to a high degree a bilingual country with historically determined and comprehensive legislation on the status and use of Dutch and French. Since 1987, Belgium has been a federal state in which the responsibility and authority with respect to migration and education policy

have been shifted to the Flemish and Walloon regional governments. In this section, the emphasis will be on IMLI in Flanders and on the status of IMLI beside that of instruction in Dutch.

### ***Arguments and objectives***

A major educational goal with regard to children of immigrant minority groups in Flanders is to redress their disadvantaged position, and, in this framework, there is a strong emphasis on learning Dutch. From this perspective, IMLI plays only a peripheral role. The available facilities are deployed for instruction in Dutch, intercultural education, the prevention and solution of developmental or learning problems, and school community work.<sup>14</sup>

IMLI has been officially available since 1981. The original aim of this type of instruction was to prepare the children of parents from specific labour force recruitment countries for remigration. While this goal has now been almost completely abandoned, it has not been replaced by a clear new aim. As a consequence, IMLI is currently characterized by a striking lack of direction and it is often tolerated in the belief that it has few drawbacks. In fact, IMLI only has aims that can be called dependent, i.e., directed at school achievement in other subjects. No attainment targets have been formulated with respect to proficiency in the immigrant minority languages in question.

### ***Target groups and enrolment***

The target groups of IMLI are not identified in terms of linguistic background, but in terms of country of birth, nationality, and the educational level of the parents. Immigrant minority policy is conceived of as a fight against inequality. A target pupil who is given educational priority from this perspective is a pupil whose maternal grandmother was not born in Belgium and who is not a Belgian or Dutch national by birth, *and* whose mother did not attend school beyond the end of the school year in which she turned 18.

It is generally pupils from Turkey, Morocco, Italy, Spain, and Greece who qualify for IMLI. In addition, Hebrew is taught to Jewish pupils at two Antwerp schools. Table 3.1 presents an overview of IMLI participation by primary schools and primary school pupils in the school year 1995/1996.

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<sup>14</sup> See the circular *Omzendbrief* 1996.

**Table 3.1**

Participation in IMLI of primary schools and primary school children in 1995/1996

Languages	Number of schools	Number of pupils
Turkish	43	2,436
Arabic	18	957
Italian	15	520
Hebrew	2	228
Spanish	1	57
Greek	4	31
Aramaic	1	8
Total	84	4,237

*Source* : Department of Education.

At a rough estimate, this number is no more than 20 % of the immigrant minority school population in Flanders. Neither in primary nor in secondary education is participation in IMLI open to indigenous Flemish pupils.

### ***Implemenation and organization***

The language legislation in Flanders stipulates emphatically that Dutch is the language of instruction in education. Therefore, IMLI can be offered only as an elective programme with experimental status that can be chosen in addition to compulsory education. A choice has to be made by the school management, teachers, and parents between a so-called 'supportive' or 'bicultural' model. The supportive model stresses the dependent role of IMLI for learning other subjects; in this model, IMLI can be given up to a maximum of 20 % of the available instruction time of 27 hours per week (i.e., 5.5 hours per week). The bicultural model is directed at the acquisition and maintenance of active bilingualism in Dutch and the immigrant language in question; in this model, a maximum of 50 % of instruction time is available for IMLI.

In fact the bicultural model is applied only in Brussels, which has an autonomous status with respect to Flanders and Wallonia. On the basis of the Brussels Foyer Project, bicultural educational experiments were carried out at some ten primary schools. The aim was for immigrant minority pupils to

achieve trilingualism from kindergarten age onwards, the three languages being Dutch, French, and a particular immigrant minority language.<sup>15</sup>

At Flemish schools, the recruitment of IMLI teachers is subject to the following conditions : the school must be funded or subsidized by the Flemish government; the parents of the pupils in question must be informed in writing about the possibility to participate in IMLI; at least two thirds of the parents must give their written consent and at least 20 pupils must be willing to participate in IMLI at one school. The criteria apply to both primary and secondary education. These high thresholds partly account for the relatively limited participation in IMLI. In practice, usually less than half of the allowed 5.5 hours per week are devoted to IMLI at Flemish primary schools. In secondary education, there is a maximum of 2 hours per week. IMLI for kindergarten pupils is permitted by law, but is seldom given in Flanders.

In secondary education, IMLI takes place either within or outside regular school hours. In the first case, it is either coupled to the contents of such subjects as geography or social education, or taught as an autonomous subject. It is almost exclusively for Moroccan pupils that IMLI is designed as an autonomous subject. In addition, IMLI is frequently offered outside regular school hours in secondary education, without government intervention, for Italian, Turkish, and Moroccan pupils.

Schools are free to take progress in IMLI into consideration when evaluating school achievement. Only rarely do schools make use of this opportunity and give pupils an official mark for IMLI. In general, report marks for 'language' refer to progress in Dutch.

IMLI in both primary and secondary education is generally funded by the embassies of the respective countries of origin. Only the above-mentioned Brussels Foyer Project has partially been paid for from the budget of the Flemish government, enabling it to recruit and professionalize a number of teachers of its own. In principle, schools can have the embassies reimburse them for the use of classrooms for IMLI. The embassies are also responsible for the selection and recruitment of IMLI teachers in the countries of origin. In actual fact, the teachers have very divergent – and often limited – professional qualifications. There are no standard procedures for the in-service training of IMLI teachers, and the quality of this training is often low. For teachers of Italian, there are relatively favourable support facilities from Italy. Finally, the

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<sup>15</sup> An evaluation of the Foyer Project, from various points of view, is presented in Byram & Leman (1990).

teaching materials for IMLI are often antiquated and frequently come from the countries of origin.

So far, the Flemish government's policy with regard to IMLI has been directed at removing organizational obstacles for embassies. In 1994, the ministry made the Flemish Educational Council (VLOR) responsible for IMLI policy development. The creation of a basic curriculum and the setting of educational goals for Italian and Turkish were to give new impetus to both the theory and practice of IMLI.<sup>16</sup> This task parallels action research being conducted by the universities of Ghent and Louvain, the aim of which is to describe a number of optimization models at the school level. The basic curriculum referred to is still under consideration in the VLOR.

### 3.3 Germany

Germany is a federal republic consisting of 16 autonomous states or *Länder*, each of which has its own responsibility and its own ministry of education. In the present federal republic, two minority groups have special language rights : the Danish-speaking inhabitants of Schleswig-Holstein and the Sorbs in Saxony. The specific status of these language groups will not be discussed. In the former East German state it was not until German unification that the themes of immigrant minority policy and IMLI were given a place on the social and political agenda. 'Being different didn't exist' was Krüger-Portratz's (1991) conclusion with respect to the status of immigrants and minorities there.

#### *Arguments and objectives*

It is at the periodical Education and Arts Ministers' Conference (*Kultusministerkonferenz - KMK*) that, among other things, the IMLI policies in the 16 *Länder* are attuned to one another. The most important recommendations of the KMK relating to IMLI can be summarized as follows. In 1964, the decision was made to adopt a two-pronged educational policy with respect to immigrant minority children. The dual aim of such education was : (1) integration into the German educational system and, consequently, assistance in learning German, and (2) reintegration into the educational system of the country of origin and therefore supplementary instruction in the mother tongue (*muttersprachlicher Ergänzungsunterricht*). The second aim was abandoned in 1971 as a result of demographic developments. The first aim has been in the

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<sup>16</sup> See Snytsers 1994.

foreground ever since. For learning German as a second language, so-called preparatory classes are recommended, in which children are placed for a maximum period of one or two years prior to receiving regular instruction. For IMLI, there are two models. According to one, the German government (i.e., the Land) is responsible for the recruitment of teachers, the development of teaching materials, and the organization of IMLI. According to the other model, the responsibility lies with the country of origin. In 1976, the KMK returned in its recommendations to the dual aims of 1964. It was now argued, with respect to IMLI, that the maintenance of the pupils' own identity was an important task of the school. The overriding argument for IMLI, however, remained the possibility of re-integration into the education system of the country of origin. What is finally worth mentioning here is the adaptation of 1979, which made it possible for pupils in secondary education to choose their mother tongue as a school subject instead of a first or second foreign language.

In view of the responsibility of the *Länder*, the recommendations of the KMK have no statutory force, although they are often at the root of legal measures. Thürmann (1994) and Luchtenberg (1995) point out that the rationale for IMLI in Germany in the 1990s are, or will be, subject to radical change, the focus being less on a policy aimed at a return to the country of origin, and more on the importance of multilingualism as a key qualification in a European context.

### ***Target groups and enrolment***

The starting point for determining the number of 'alien pupils' is the parents' nationality. In 1994, there were 1,122,010 immigrant minority pupils in German education (*allgemeinbildende und berufliche Schulen*), which is more than 9 % of the total number of pupils. The two largest groups are formed by Turkish children (N=472,226) and by children from the former Yugoslavia (N=190,650).

In the first instance, IMLI in most Länder was limited to children belonging to families from the former recruitment countries for foreign workers (the so-called *Entsendestaaten*), as mentioned in the 1977 EU directive. These are the EU countries Italy, Greece, Spain, and Portugal as well as Turkey and the former Yugoslavia. In addition, some Länder offer IMLI to children from Morocco and Tunisia.

In a number of *Länder*, the legislation has recently been modified to enable other immigrant minority children to qualify for IMLI. An example is Lower Saxony where, since 1993, IMLI has been made possible for children

from immigrant families from non-recruitment countries. In practice, this means that Persian, Vietnamese, Kurdish, and Polish have become available in Lower Saxony as languages of instruction.

Specific to Germany is the policy with respect to the so-called resettlers (*Aussiedler*), i.e., people from Poland, the former Soviet Union, Romania, and the former Yugoslavia who can prove that, via their (often remote) ancestors, they are of German descent. Whereas it is difficult for traditional 'guest workers' and new immigrant groups such as asylum seekers or refugees to acquire German nationality, this is very easy for returned resettlers. Children from resettlers' families are often given instruction in their non-German native language.

In spite of the limited school status and the extra time load, there is a keen interest in IMLI on the part of most immigrant minority groups. Roughly speaking, 60-80 % of the pupils in primary and secondary education qualifying for IMLI actually participate in it. Table 3.2 gives an overview of participation in IMLI in the school year 1995/1996 in North Rhine-Westphalia for the largest immigrant minority groups.

**Table 3.2** Participation in IMLI in 1995/1996 in North Rhine-Westphalia

Country of origin	N total	N IMLI	%
Turkey	138,239	90,386	65
former Yugoslavia	26,668	7,961	30
Italy	18,798	8,840	47
Bosnia-Herzegovina	13,114	unknown	unknown
Morocco	11,915	5,117	43
Greece	10,300	5,780	56
Croatia	4,418	2,800	63
Portugal	4,008	3,111	78
Spain	3,711	3,296	89

*Source* : LSW 1996.

These data show that there are remarkable differences in participation in IMLI between different immigrant minority groups in North Rhine-Westphalia. Participation in IMLI is highest (89 %) for the country of origin Spain and lowest (30 %) for the former Yugoslavia (Croatia and Bosnia are listed separately).

### ***Implementation and organization***

In the former West German *Länder*, two models for IMLI obtain. In the first model, IMLI falls for its content, organization, and funding under the responsibility of the consulate of the country of origin. This is the model opted for by Baden-Württemberg, Berlin, Bremen, Hamburg, Saarland, and Schleswig-Holstein. In the second model, the responsibility for IMLI resides with the educational department (*Schulverwaltung*) of the Land. This model is operative in the states of Bavaria, Lower Saxony, North Rhine-Westphalia, and Rhineland-Palatinate. Although the Hesse has also adopted this model, it occupies a special place in that IMLI has been compulsory since 1983.

In the *Länder* of the former East Germany (Brandenburg, Mecklenburg-Western Pomerania, Saxony, Saxony-Anhalt, and Thuringia), no IMLI measures have been taken comparable to those taken in the other *Länder*, an important reason being the relatively small number of immigrant minority pupils. Only in Saxony have consulates been allowed, since 1992, to offer IMLI.

IMLI according to the consulate model is becoming less popular, as it is increasingly difficult to integrate it into the regular programme. The fact that consulate-supervised IMLI is less easy to influence is also considered a serious drawback. In such specific situations as those in which Serb and Croat pupils find themselves, control over the actual implementation of IMLI and the teachers' backgrounds is felt to be desirable. The countries of origin are also decreasingly inclined to make arrangements for IMLI. Consulates of EU countries such as Portugal and Spain, on the other hand, are increasingly active in promoting knowledge of their countries' language and culture among EU citizens in Germany.

In the various *Länder*, education is provided for a large number of immigrant minority languages. For example, the Education and Arts Ministry of North Rhine-Westphalia offers structural IMLI facilities for the following languages : Albanian, Arabic (for pupils from Morocco and Tunisia), Greek, Farsi (Iran), Croatian, Serbian, Italian, Polish, Portuguese, Russian, Spanish, and Turkish.

De jure, it is usually the standard language of the country of origin which is chosen as the target language of IMLI; de facto, non-standard languages are also offered in a number of *Länder*. The need for IMLI is assessed by the school management in consultations with the parents. Subsequently, the total need per school district is determined. The minimum number of pupils required per language varies from state to state. In the states with consulate-supervised IMLI, there is usually no explicit mention of a

minimum number of pupils. If a minimum number is specified, it varies from 8 to 15 pupils per class.

In the secondary schools of some states, it is possible to take an immigrant minority language as an optional subject instead of the first or second (obligatory) European foreign language. Sometimes no lessons are given, the only option being to take an exam. Again there are substantial differences between the states : sometimes IMLI is offered only in a certain type of school (grammar school, vocational education); sometimes it is only available for pupils who have not attended German schools from their sixth year; sometimes it is only given in specific languages. In terms of availability and participation, the most progress has been made with Turkish as an optional subject in secondary education.

From the perspective of increasing European cooperation, the importance of being able to learn a foreign language at an early age has been discussed in various states. In North Rhine-Westphalia, for example, the concept of teaching 'neighbourhood' languages (*Begegnungssprachen*) is being discussed. These are not just Dutch and French in the areas bordering on the Netherlands and Belgium, but also languages like Turkish, Italian, or Portuguese at schools with high concentrations of pupils speaking these languages as their mother tongues. In Rhineland-Palatinate and Baden-Wuerttemberg, *Länder* bordering on France, there are also primary schools where pupils can receive bilingual instruction in German and French at an early age.

Finally, some states have so-called European schools which specifically aim at a European dimension in their teaching. Berlin is the only state where this European conception is also adhered to in primary education; in the other states, it is only operative in secondary education. In these European schools, language instruction is an important component. However, immigrant minority languages are only marginally covered by this European dimension. For example, the European schools in Berlin do devote attention to English, French, and Russian, but not to Turkish, in spite of the substantial Turkish-speaking community in Berlin.

In general, a maximum of five hours per week can be devoted to IMLI. In some states, an extra two hours of IMLI can be offered, but only if religion (particularly Islam or Greek Orthodoxy) is part of this instruction. In practice, the number of hours is probably lower, an estimated two and a half hours per week. In primary education, IMLI lessons are usually given during the school day; often some of the lessons (two hours) are taught parallel to religious instruction for the other pupils. Participation in IMLI is voluntary. Only in Hesse is it obligatory, although it is quite easy for parents to obtain an exemption.

The progress in language proficiency made by pupils who participate in IMLI in primary education is expressed in a separate report mark. In Hesse, where participation is obligatory, the IMLI mark has the same status as the marks for other subjects, and also carries weight in the end-of-year report. In the other *Länder*, the status of this report mark is limited and not comparable to the status of the marks for other school subjects, although in at least some of them its status may be upgraded in the future.

The financing and appointment of IMLI teachers varies per *Land*. In the consulate model, IMLI is largely funded by the countries of origin. Financial support by the *Land* itself is usually restricted to the rental of classrooms. The teachers, too, are under the supervision of the country of origin. They come to Germany in rotation, being appointed for a maximum of five years. When IMLI is offered under the responsibility of the *Land*, IMLI teachers are appointed by its Education and Arts Ministry and enjoy the same status and rights as other teachers. In fact, IMLI funds are not earmarked as such and can also be employed for instruction in German as a second language to immigrant minority pupils.

Obviously, consulate-funded IMLI is cheaper for the *Land*. In 1990 in Hamburg, for instance, nearly 30,000 pupils (11 %) had a non-German passport. Per year, Hamburg spends about DM 600,000 on IMLI. This amount would be at least ten times higher if IMLI did not fall under the responsibility of the consulates in Hamburg.

As a result of the complex IMLI conditions, there are only a few German states with clear directives for the curriculum. In states where the consulate model is operative, the content and aims of IMLI are mostly determined by the countries of origin, where the teaching materials are usually developed. Since 1989, recommendations for IMLI method and instruction have been drawn up at the instigation of the *KMK*. Some of the states themselves also play an active role in the development of educational plans and teaching materials. In this respect, especially Hesse and North Rhine-Westphalia deserve mention.

In the long run, IMLI policy in most *Länder* will undergo drastic change. There is a clear convergence in top-down and bottom-up processes in both policy and implementation of instruction in the mother tongue. On the one hand, various documents and studies regularly draw attention to the link between knowledge of languages and a strong position in a united Europe. On the other hand, there is a serious mismatch between the directives in the various member states and IMLI practice. An important factor of change is the dynamism in the composition of immigrant minority groups, especially the

strong increase in the number of people from Eastern Europe. It is as yet unclear what changes the future will bring in the status and implementation of IMLI in Germany, but one can observe a tendency towards increasing decentralization. For the time being, IMLI in Germany remains 'supplementary instruction' with the unequal status of an extra facility apart from the regular education programme.

### 3.4 France

French primary and secondary education consists of 2 years of nursery school (ages 4-5), 5 years of primary education (ages 6-10), 4 years of *collège* (ages 11-14), and 4 years of *lycée* (ages 15-18). In primary education, IMLI is called ELCO (*Enseignement des Langues et Cultures d'Origine*); in secondary education, it is called ELV (*Enseignement des Langues Vivantes*). French IMLI policy is very reserved, which has historical origins. The motto of the French Revolution, 'one state, one nation, one language', has not only devalued the status of regional minority languages and upgraded French as the language of national unity in the 19th and 20th century, but it has also led to far-reaching centralism: educational policy in France is arranged from Paris. In this centralized policy, the use of patois has historically been taboo. In primary education, German in Alsace, in particular, has maintained a relatively high status: in 1982, 75 % of the pupils were enrolled in German as an optional subject for approximately 2 hours a week. Languages like Basque, Breton, Catalan, Corsican, and Occitan are only very rarely taught in primary schools. In secondary education, regional minority languages have occasionally been given an optional status as second or third modern languages, but enrolment is low (Breton 3 % in 1982-1987, Occitan 8 % in 1985-1986). Both in primary and secondary education, minority languages are also languishing, owing to a lack of continuity, teaching materials, and competent teachers.

Regional minority languages are strongly marginalized by standard French in education; immigrant minority languages even more so. Both in primary and secondary education, immigrant minority pupils are strongly encouraged to learn French as a second language. Since the beginning of the eighties, IMLI has often been organized on the initiative and with the financial support of the consulates of the most important countries of origin, particularly Algeria, Tunisia, Morocco, Italy, Spain, Portugal, Turkey, and the former Yugoslavia.<sup>17</sup>

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<sup>17</sup> For studies on immigrants and their children in France, we refer to Tribalat (1995) and MARS (1996); for an overview of French ELCO, see Cassius (1994).

### *Arguments and objectives*

IMLI was initially established with a view to the remigration of migrant families to their countries of origin. This argument has been largely invalidated in the course of time. Other arguments have taken its place, which vary depending on who is being asked to argue the point. For the *consulates* of the Arabic countries of origin that fund this type of education (especially Morocco), IMLI is an alternative to the 'religious' courses that are propagated by various Islamic organizations. Through IMLI, children acquire a minimum knowledge of the Arabic language and culture of their country of origin and can thus maintain ties with this country. A less overt argument is that these ties will then be subject to control by the consulates. Arabic *parents* often appear to have cultural and/or religious motives : children should learn Arabic to improve their knowledge of Arabic culture and/or the Koran. Finally, the *Ministry of Education* predominantly conceives of IMLI as conducive to integration and a successful school career, believing that immigrant minority pupils will be more successful if they are better acquainted with their community language and culture.

Owing to the this divergence in arguments of various actors, reforms of cooperative agreements between France and the most important countries of origin are an uphill struggle. As a consequence, the objectives of IMLI in primary education remain very vague. Mixed groups of experts from France and the countries of origin are making an effort to establish language- and culture-specific attainment targets. In secondary education, children are not instructed in their 'own' language, but they are incorporated into modern foreign language classes with attainment targets for proficiency. Depending on the composition of their classes, teachers are expected to make allowance for differences in mother-tongue backgrounds.

### ***Target groups and enrolment***

The participants in primary school IMLI are mainly children of parents from countries that fund this type of education through their consulates, even though IMLI is open to other children if the teacher involved and the school's headmaster give their consent. A survey of the languages that were available and chosen in the 1989/1990 school year is presented in Table 3.3.

**Table 3.3**

Languages available and chosen in primary education 1989/1990

Language	N pupils	N schools	N teachers
Algerian Arabic	20,525	845	288
Moroccan Arabic	25,397	874	208
Tunisian Arabic	7,642	429	170
Portuguese	25,441	1,457	333
Turkish	16,398	721	193
Italian	12,572	337	74
Spanish	2,741	166	86
Yugoslavian languages	1,431	70	77
Total	112,147	4,899	1,429

*Source* : French Education Ministry.

In the school year 1990/1991, approximately 30 % of the Portuguese, Turkish, Italian, Spanish, and former-Yugoslavian pupils enrolled in IMLI; less than 20 % of the Arabic pupils did so. In secondary education, each pupil can opt for any foreign language as an optional subject. Table 3.4 presents figures for language enrolment in the school year 1991/1992.

**Table 3.4**

Language enrolment in secondary education in 1991/1992

Language	Number of pupils
English	5,150,702
Spanish	1,444,906
German	1,387,411
Italian	177,337
Russian	29,388
Portuguese	14,388
Standard Arabic	13,226
Hebrew	4,545
Chinese	2,732
Japanese	1,403
Dutch	570
Polish	297
Other languages	4,121
Regional languages	22,129
Correspondence courses	5,232

*Source* : French Education Ministry

Some remarkable ethno-cultural dividing lines are apparent in the choice of languages. Spanish is often chosen by French pupils, Portuguese much less, and Arabic hardly ever. Most pupils who enrol in Arabic as an optional subject are of Arabic origin. Standard Arabic is being taught in both primary and secondary education. Because this is a foreign language for most Arabophone pupils too, their motivation is rather low.

Two alternative routes are open to anyone in France wishing to take exams in non-Western European languages that are not on the secondary education curriculum: enrolling in long-distance education at the National Centre for Distance Education (CNED) or sitting for the annual state exams without taking any courses to prepare for them. The state exams for non-Western European languages are developed, organized, and assessed by the National Institute for Oriental Languages and Civilizations (INALCO) in Paris. In 1995, INALCO administered written exams for a great number of non-Western European languages, including Albanian, Amharic, Arabic

dialect, Bambara, Berber, Bulgarian, Cambodian, Korean, Hausa, Hindi, Hungarian, Indonesian, Laotian, Lingala, Macedonian, Malegash, Persian, Peulh, Romanian, Serbian, Croatian, Slovak, Slovene, Swahili, Tamil, and Czech. In addition, Armenian, Finnish, Norwegian, Swedish, Turkish, and Vietnamese will also shortly acquire the status of 'examination languages'. In 1995, a total of 11,878 people registered for state exams. The greatest number registered for Arabic dialect (7,555 entries), followed by Berber (1,532), Turkish (600), Serbian (340), and Vietnamese (242).<sup>18</sup>

### ***Implematation and organization***

IMLI is offered in primary education if the consulate concerned wishes it and the Ministry of Education approves it. Often it is the parents who want IMLI and turn to the consulate. There are no fixed guidelines for minimum enrolment : this is a matter of negotiations between the consulate, the Ministry, and the school management. Parents have no role in teaching activities. The teachers are seconded to schools and paid by the consulates. In secondary education, a minimum of 5-8 participants is required for lessons to take place, depending on the type of secondary school. However, decisions to offer lessons are in fact not taken on the basis of numerical criteria alone, but are largely in the hands of school managements and boards, who have autonomous powers. School managements are often against it, either on budgetary grounds (it is easier and cheaper to offer just one or two foreign languages in school), or for more covert reasons (if Arabic is on the curriculum, this tends to attract immigrant minority rather than indigenous majority pupils to the school). The IMLI teachers are employed by the Ministry of Education and must, therefore, be French nationals. These are mostly teachers from Arab countries.

With financial assistance from the consulates, one and a half to three hours of IMLI per week can be taught in primary schools, either instead of other subjects, or outside regular school hours (in the afternoon or evening). Both variants are common. In the latter case, lessons usually take place in school classrooms anyway. In either case, IMLI will be given during the entire primary school period or during the last four years. With the financial support

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<sup>18</sup> The written state exam for Arabic has two optional graphic variants (Arabic or Roman script) and two regional variants (Maghreb or Oriental Arabic). To avoid artificial languages, Maghreb languages have been further subdivided into Moroccan Arabic, Algerian Arabic, and Tunisian Arabic; Oriental Arabic has been subdivided into Egyptian, Syrian, Lebanese, and Palestinian Arabic.

of the Ministry of Education, three to four hours of IMLI per week are provided in secondary education, integrated into the general curriculum. For pupils from different educational tiers in the school, teaching sometimes takes place outside regular school hours (in the afternoon or evening).

In primary education, attainment targets for evaluating immigrant minority language proficiency are lacking. An attempt is being made to integrate IMLI into the general curriculum and to evaluate it in terms of overall school achievement; sometimes a separate report mark is given. In secondary education, IMLI proficiency is tested like any other subject. If candidates pass a state exam, the result may count as an additional credit on school reports.

Primary school teachers are recruited through the consulates of the various countries of origin. The French government is not involved in their previous training or subsequent schooling, though IMLI teachers are eligible for participation in training programmes for other teachers. Some teachers participate, on an experimental basis, in in-service training programmes that are organized by the Education Inspectorate. Secondary school teachers are recruited through public selection procedures, and they may participate in the regular training programmes.

The consulates are responsible for curriculum development in primary education, which is being done by mixed expert groups. The French government is responsible for curriculum development in secondary education, which chiefly concerns the Arabic and Portuguese languages.

### **3.5 Great Britain**

In this section, some attention will be devoted to the ways in which pupils from immigrant minority groups are being identified and to the role of language in this process. Educational policies on Welsh and Gaelic in Wales and Scotland will be left out of consideration.

The central government in London allocates funds to the local authorities of major districts and regions. In principle, these local authorities are granted a great deal of liberty and flexibility in how they spend these funds. In education, however, their freedom is limited to a considerable extent by the straightjacket of the National Curriculum. All children between five and sixteen go through this compulsory curriculum, which consists of eleven subjects and is divided into four phases relating to the children's ages. The National Curriculum fully engages a pupil's school week. In phase 3, from age

eleven, a modern foreign language is offered. All official languages of the European Union are considered modern foreign languages. The National Curriculum was introduced in 1988; it was evaluated in 1994 and will not be changed again until the year 2000.

Educational facilities to promote racial equality in education are funded mainly by special grants. A ministerial guideline known as Section II of the 1966 Local Government Act plays a key role here. This guideline allows an earmarked budget to be allocated to local authorities, who are to take special measures in consequence of the presence of persons belonging to immigrant minority groups whose language or customs differ from those of the rest of the community.

### ***Arguments and objectives***

Since the publication of the influential report entitled *Education for All* (DES 1985), the official government policy has been defined as follows :

- to raise the performance level of all pupils and to remove the obstacles to higher achievement which are common to all;
- to give immigrant minority pupils the same opportunity as all others to profit from what the schools can offer them by meeting their particular educational needs, for example, by promoting good practice in the teaching of English;
- to preserve and transmit the national values in a way which accepts Britain's ethnic diversity and promotes tolerance and racial harmony.

Any attention paid to languages spoken by immigrant minority groups in addition to, or instead of, English virtually exclusively serves a dependent educational objective : it serves to develop proficiency in English as a second language in order to enable immigrant minority children to participate in the National Curriculum successfully. Though the British government has stated that the ethnic and cultural diversity of British society should be evident in the school curriculum, in practice this boils down to intercultural projects, additional provisions in primary education for bilingual assistant teachers helping out in the classroom, and additional provisions in secondary education after the national languages of the European Union have been served first. In short, English education is predominantly education in English and the immigrant minority groups themselves are responsible for IMLI.

### ***Target groups and enrolment***

In the language policy and education programmes for immigrant minority children, attention is mainly devoted to English as a second language and to intercultural education. Hence, the importance of specifying target groups for IMLI and data on IMLI enrolment has become marginal. Nevertheless, the definition and identification of immigrant minority groups has played an important role in minority policy and IMLI policy. The developments of the last thirty years show remarkable differences in the extent to which the careers of pupils from immigrant minority groups can be traced.

The education system in Great Britain is largely decentralized. At the national level, the Department of Education and Employment (DFEE) has collected information about the number of pupils from immigrant minority groups since 1966. At first, the native country of the pupils and their parents was used as a combined identification criterion. However, the usefulness and the validity of this statistical information met with such scepticism that the government decided to discontinue collecting these data in 1973. As a result, only minimum information about the number of pupils and the composition of immigrant minority pupils was available for a long time.

In 1985, the influential Swann report *Education for All* pointed out the difficulty of drawing up a budget for provisions in the absence of nationally recognized educational statistics. In the period 1990-1995, all schools in England were expected to carry out an annual ethnic monitoring survey and to send off a survey of their total pupil population to the central Department of Education and Employment. Questions in the survey concerned ethnic origin, mother tongue, and religious affiliation. However, it was unclear how the ethnic origin of pupils should be interpreted. In the explanatory section for the schools, ethnic origin was considered to be a more or less objective feature of a pupil, although subjective self-classification by the pupil was also taken into consideration. In the official registration of pupils' native languages in the school year 1994/1995, the following languages were distinguished: Bengali, Cantonese, Greek, Gujerati, Hindi, Italian, Punjabi, Portuguese, Spanish, Turkish, and Urdu. If more than 20 pupils in a school were categorized as *Other*, their mother tongues were also to be mentioned explicitly. The identification of pupils on the basis of the language they use also raised some questions. The questionnaire obtained information about the pupil's *mother tongue*, whereas the schools had actually been instructed to collect data about *the language or languages spoken in the home*. Moreover, no information was obtained about the intensity with which the specific language was used nor about the persons it was spoken with.

The school obtained data on pupils' ethnicity by interviewing the parents on a voluntary basis. If the parents did not want to provide such information, the school was not entitled to make assumptions about ethnicity. The ethnicity data for those specific pupils would then be lacking and they were listed as *unclassified*. How information was collected depended on the local situation. The most important options were : a mailed questionnaire for the parents, an interview of the parents by the headmaster, and a group interview between the headmaster and several parents, in which each parent was asked to fill in a questionnaire.

Because after a period of five years a great number of pupils were categorized as *unclassified* by the schools, the system of an annual Ethnic Monitoring Survey of education was thoroughly revised. In addition, the ethnicity data could not be linked to other educational indicators such as the level of achievement in the National Curriculum and the achievement of individual schools. As of the school year 1995/1996, the separate Ethnic Monitoring Survey as described above was abandoned. Since then, information about the educational needs and school achievement of immigrant minority pupils has been obtained by a combination of three sources of information : the annual school census, the four-yearly evaluation by the education inspectorate (OFSTED), and periodical ad hoc surveys.

The school census form, which is used to map the entire school population – the 18th of January of each year being the reference date – is very extensive. The information that is specifically obtained about immigrant minority pupils is, however, minimal; in the 1996 school census, such information concerned the following : the total number of pupils that belong to an immigrant minority group; the identification (not the numbers) of the four largest immigrant minority groups; the total number of pupils for whom English is a second language.

In contrast to the Ethnic Monitoring Survey, no information is requested about the pupils' mother tongue, and the pupils' knowledge of English as a second language has clearly gained prominence. The categorization into immigrant groups was carried over from the 1991 census. The schools are advised to collect the ethnicity data on the school census form chiefly from the parents. The Ministry of Education (DFEE) is aware that the data they obtain provide only a rough picture of the multicultural composition and the language needs of a school. Therefore, additional information is collected by the education inspectorate (OFSTED) at least once every four years. This involves information about : the number of pupils in each major immigrant group; the number of pupils for whom English is not their first language; the four most

important languages other than English spoken by pupils in the school; the number of pupils eligible for so-called Section II support and the corresponding number of Section II teachers.

The education inspectorate, therefore, does obtain some information about languages, but this is information about their use in the school, not in the home.

Schools must adhere to the guidelines of the National Curriculum. In practice, this means that the curriculum offers hardly time for IMLI. In primary education, an immigrant minority language may be offered for auxiliary purposes only; IMLI cannot be taught as an autonomous subject. In secondary education, the most important immigrant minority languages can be offered as subjects in the National Curriculum. Parents are to indicate their need for IMLI to be taught as a subject. Subsequently, at least two conditions have to be met : priority has to be given to national languages of the EU and sufficient funds have to be made available in order to be able, at the very least, to appoint an examination committee. IMLI is occasionally organized by immigrant groups themselves in, e.g., community centres. In this case, government funds are only available for accommodation.

### ***Implematation and organization***

Proficiency in English is considered the key to access to, and success in, the National Curriculum. Within this narrow framework, local (education) authorities are responsible for the education of immigrant minority pupils. Many reports mention the government's intention to further decentralize educational policy, which means that the schools' budgets are directly transferred to the schools themselves, bypassing the local education authorities. However, the schools themselves, the local education authorities, and immigrant minority groups are not very receptive to such far-reaching decentralization efforts.

To meet the specific needs of pupils from immigrant minority groups, bilingual assistants are appointed. These assistants are not considered educational staff, and they are generally funded by specially earmarked Section II budgets. There are also foreign-language assistants in secondary education in addition to qualified teachers to teach or assist pupils who have opted for a second language on the curriculum, such as French or German.

For a long time, the Section II target groups had been limited to immigrant minorities from the New Commonwealth countries like India and Pakistan. As of the school year 1995/1996, however, all immigrant minorities

in Britain are in principle eligible for Section II support. These Section II funds reach the local authorities in one of two ways : firstly, as an earmarked part of the total budget for a number of socioeconomic indicators (including funds for the fire brigade or the police). In addition to the number of pupils in a certain district, the so-called AEN factor (Additional Educational Needs) is also used to determine what educational facilities will be needed. This AEN factor consists of the number of : children of single parents; children of income support claimants; residents under 16 born outside the Irish republic, the USA, or the old Commonwealth.

Secondly, Section II funds reach immigrant minority groups as earmarked funds through the Local Education Authorities (LEAs). These LEAs, which are a kind of major regional school counselling services, apply directly to the central government (Home Office) for such funds.

Finally, LEAs can also apply directly to the central government for Grants for Educational Support and Training (GEST). These grants must be spent in accordance with the terms of the National Curriculum. Since the school year 1995/1996, GEST has been aimed at developing teaching skills for dealing with linguistic diversity in the classroom and at promoting pupils' mastery of English, thus securing full access to the National Curriculum.

### **3.6 The Netherlands**

In the Netherlands, regional language varieties have traditionally been current in addition to the Dutch language. Frisian, however, is the only regional language variety with a legally protected status extending to primary and secondary education. The introduction of Frisian in primary education was historically motivated with the argument of combating deficits in school achievement.<sup>19</sup> However, Frisian-speaking children are no longer less successful than Dutch-speaking children in Friesland. The motivation for instruction in Frisian has shifted to cultural-political arguments in the course of time. In primary education, Frisian is currently a compulsory subject for all pupils in Friesland (generally one hour a week); in secondary education, it is an optional subject.<sup>20</sup>

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<sup>19</sup> See De Jong & Riemersma 1994.

<sup>20</sup> For a comparison of the status of instruction in Frisian with that of IMLI in the Netherlands, see Extra (1989); for a comparison of the status and use of various immigrant minority languages in the Netherlands with one another, see Broeder & Extra (1995), Broeder et al. (1993), and Extra & Verhoeven (1993).

The introduction of IMLI in the Netherlands has a remarkable history. In 1974, IMLI (then known as OETC in Dutch, and today as OALT) was introduced for large groups of pupils in primary schools without any preparation, counselling, curriculum, or supervision, and even without any legal basis. IMLI was originally introduced in primary schools with a view to the remigration of migrant families. At the end of the seventies, however, the remigration argument faded into the background. The IMLI developments can only be understood against the backdrop of the developments in minority policy in the Netherlands after 1980. This policy has focused very strongly on socioeconomic deficits; this perspective has also dominated educational policy for immigrant minority pupils. Schools with many pupils from disadvantaged families were granted additional funds to combat deficits. Because immigrant minority children come from socioeconomically disadvantaged families more often than indigenous majority children, this deficit perspective was even reinforced.

In its report *Ceders in de tuin* (Cedars in the Garden 1992), the Committee for Immigrant Minority Pupils in Education opted for a perspective in which immigrant minority languages are not primarily considered as sources of problems and deficiencies, but as sources of potential knowledge and skills. This latter starting point requires a multicultural perspective rather than a deficit perspective. The perspective that is actually chosen has different consequences for one's choice of objectives, target groups, target languages, and evaluation of IMLI.

### ***Arguments and objectives***

After the remigration perspective had faded into the background, the objectives of IMLI were increasingly formulated in terms of dependence: IMLI was to contribute to bridging the gap between the home and school environment and to promoting school success in Dutch and other subjects. The number of those who have advocated intrinsic objectives, i.e., promoting first-language acquisition, is remarkably small. In 1996 the National Institute for Curriculum Development (SLO) has elaborated core objectives for eight curricular areas in primary education, including three languages, viz., Dutch, Frisian, and English. The core objectives of these languages concern oral and written skills and language awareness. Despite references to the development of the Netherlands into a multicultural society, core objectives for immigrant minority languages are lacking.<sup>21</sup>

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<sup>21</sup> Objectives in terms of mastery of Turkish and Arabic in primary and secondary education have been proposed by Diephuis et al. (1992a and 1992b).

It is a remarkable fact that such intrinsic objectives have been accepted much sooner and on a much wider scale in secondary education.<sup>22</sup> *In Cedars in the Garden* too, intrinsic rather than dependent objectives are primarily advocated, both in primary and in secondary education.

### ***Target groups and enrolment***

Which primary school immigrant minority pupils are eligible for IMLI has been specified in school circular letters (but not in legislation); these are : pupils of Moluccan origin; pupils who have at least one parent who originates from the former Mediterranean recruitment countries; pupils who have at least one parent who has been admitted as a refugee; pupils from one of the EU member states.

Funding for the target groups is now actually subject to three kinds of restrictions : the target groups are exhaustively described in terms of a historically determined and limited list of countries of origin; provisions are meant to be temporary for first- and second-generation children; and disadvantaged socioeconomic status is an important criterion for IMLI eligibility. Chinese children, for instance, have never been eligible for IMLI because it has never been demonstrated that they are liable to disadvantages similar to those of other immigrant minority groups. On similar grounds, pupils from EU countries are in fact not eligible for IMLI funding either. The *Cedars in the Garden* report proposes dropping the generation criterion and the socioeconomic criterion and replacing them with the home language criterion : IMLI should be made available to those immigrant minority children who are addressed in an immigrant minority language at home in addition to, or instead of, Dutch by at least one of the parents, and it should be supplied by municipalities and schools if there is a certain demand and if qualified teachers are available.

In its response to *Cedars in the Garden*, the previous cabinet, through its Minister of Education, endorsed the starting points for IMLI laid down in this report, but proposed limiting the introduction of new target groups to Chinese, Antillean, and Surinamese pupils on organizational and financial grounds.<sup>23</sup> Though this meant a partial acknowledgement of multicultural motives, the

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<sup>22</sup> See the detailed attainment targets for Turkish and Arabic in lower vocational education and junior secondary education, as formulated by the National Examination Committee in *Uitleg* 1990.

<sup>23</sup> See Ritzen 1993.

government opted once again for an extensive enumeration of target groups rather than for principled criteria.

The choice of target languages has caused problems where the home language deviates considerably from the standard language of the country of origin. This is particularly so for Moroccan children who often speak a Berber language at home. Many Moroccan parents, however, appear to prefer instruction in Arabic for their children, on cultural and religious grounds. If the home language diverges widely from the standard language, parents and pupils are granted a right of choice in *Cedars in the Garden* (under certain restrictive conditions), on the basis of the principle of cultural self-orientation. In primary education, such a choice of the home language instead of the standard language of the country of origin is already available to Moluccan children (Moluccan-Malay) and to Syrian-Orthodox children from Turkey (Aramaic).

Table 3.5 presents an overview of the IMLI enrolment figures of various groups of immigrant minority children. First of all, it shows that enrolment of immigrant minority pupils in IMLI is subject to both temporal and intergroup fluctuations. Enrolment of Turkish and Moroccan pupils remains relatively high, which points to a widely felt need. Such differentiation in time and groups will be strongly determined by a combination of factors, such as the degree of institutional support from headmasters and school governing bodies, the parents' and pupils' attitude towards IMLI, and the geographical distribution of immigrant minority groups (which will determine whether or not the numerical criterion of eight pupils per language group per school can be met). No comparative studies on the actual causes of this differentiated picture have been undertaken so far.

**Table 3.5**

Enrolment of immigrant minority pupils in IMLI in 1990 and 1993

Country of origin	1990			1993		
	N total	N IMLI	%	N total	N IMLI	%
Morocco	38,867	27,506	71	41,373	28,205	68
Turkey	38,294	31,328	82	42,619	33,002	77
Moluccan	4,755	1,726	36	3,970	1,559	39
former Yugoslavia	2,989	807	27	4,474	1,129	25
Spain	2,721	914	34	2,244	706	32
Italy	2,529	262	10	2,170	271	13
Cape Verde Islands	2,462	1,031	42	2,189	417	19
Portugal	1,506	508	34	1,890	1,095	58
Greece	815	318	39	855	261	31
Tunisia	671	69	10	969	298	31
	95,609	64,469	67	102,753	66,943	65

*Source* : Ministry of Education, Culture, and Science.

In secondary education, the situation is as follows. Pupils with a non-Dutch cultural background may be taught the languages of their countries of origin as optional subjects on the basis of the VWO-HAVO-MAVO-VBO (Organization of Teaching) Decree. The intention is to make instruction in immigrant minority languages available to all pupils, independent of their home language background. Table 3.6 represents the spread of pupils over the languages that were chosen in four consecutive school years. In 1995, 153 pupils took the nationwide written Turkish exam, and 53 pupils took the nationwide written Arabic exam.

**Table 3.6**

Spread of pupils in secondary education over languages chosen in the period 1991-1995

Languages chosen	91/92	92/93	93/94	94/95
Albanian	-	-	-	30
Arabic	3,966	3,354	3,321	3,667
Aramaic	20	16		9
Persian	15	15	27	29
Italian	5	6	-	-
Serbo-Croatian	45	142	253	313
Moluccan/Malay	153	38	36	44
Portuguese	308	213	368	152
Spanish	47	53	70	19
Turkish	3,370	3,235	3,282	3,922
Vietnamese	5	11	5	19
Total	7,934	7,083	7,362	8,204

*Source* : Ministry of Education, Culture, and Science.

### ***Implematation and organization***

The current status of IMLI is laid down in Article 10 of the Primary Education Act (WBO), which stipulates that a school with pupils of a non-Dutch cultural background *may* include IMLI in its curriculum if these pupils' parents desire it. Whether IMLI will actually be offered is determined by the interplay of forces of school managements, teachers, parents, and pupils. Article 10 of the WBO also stipulates that a maximum of 2.5 hours of IMLI per week may be provided within regular school hours and 2.5 hours outside school hours. These stipulations are given different interpretations in practice.

The Staff Establishment Decree WBO 1992 stipulates that the government will support IMLI for the earlier mentioned target groups by providing additional staff if there is a minimum of eight pupils per language group per school. Clusters of schools can also jointly draft an education plan, on the basis of which more pupils can be reached with the same budget.

In secondary education, immigrant minority languages are available as optional subjects in conformity with Article 12 of the Secondary Education Act (WVO), either in addition to, or instead of, other optional subjects. To

provide this kind of education, there is a provision for additional staff if there is a minimum of four pupils that enrol in a certain language for two hours a week. Schools can jointly arrange this type of instruction for each other's pupils, which means that tasks can be divided on the basis of mutual agreements. The school offering a certain language receives compensation for all pupils enrolled for such instruction.

Evaluative studies of IMLI in primary education indicate that there is a remarkable preference for examining the effects of IMLI on second-language acquisition and/or school achievement rather than on first-language acquisition: first-language achievement is rarely considered school success. In *Cedars in the Garden*, progress due to IMLI is emphatically considered as educational achievement that needs to be assessed. Empirical studies of the effect of IMLI on first-language proficiency are few and far between. Some researchers found that instruction in Turkish had positive effects on the Turkish proficiency of Turkish primary-school pupils, whereas similar effects of instruction in Arabic are much less evident for Moroccan pupils.<sup>24</sup> At the request of the National Institute for Educational Measurement (CITO), tests have meanwhile been developed that permit assessment of language proficiency in Arabic and Turkish at the end of the primary school period.<sup>25</sup> Bilingual tests have also been developed for CITO that allow the nature and degree of bilingualism to be determined at the beginning of the primary school period for Turkish, Moroccan, and Antillean pupils in Turkish and Dutch, Arabic and Dutch, and Papiamento and Dutch, respectively.<sup>26</sup>

Finally, the requirements that IMLI teachers in primary schools have to meet have been specified in the Qualifications Decree WBO. These requirements are strongly biased towards proficiency in Dutch (as a second language) and much less towards the didactic knowledge and skills needed for providing IMLI to young children. IMLI teachers are predominantly trained by means of refresher courses. Many IMLI teachers work as subject teachers in part-time positions along with group teachers in full-time positions; they often have to live up to many different expectations at the same time, which, besides teaching, may extend to the development of (additional) teaching materials and intermediary contacts with parents and other schools.

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<sup>24</sup> See Aarts 1994 and Aarts et al. 1993; see Driessen 1990 for similar results.

<sup>25</sup> See Aarts & De Ruiter 1995.

<sup>26</sup> See Verhoeven et al. 1995.

In the last few years, new curricula and teaching materials have been developed for specific languages : for Moluccan-Malay; for Arabic; and for Chinese.<sup>27</sup>

The importance of local support is increasingly being emphasized in the national government's education policy. Hence, a new balance in the responsibilities of government, municipalities, and schools is being pursued. This pursuit is the central theme of the memorandum *Local Education Policy* by State Secretary Netelenbos. This memorandum proposes decentralizing the responsibilities and means for accommodation, counselling, prioritization, Dutch as a second language, and IMLI to the local councils of municipalities. With regard to IMLI, this memorandum signals a change of thought :

‘The Netherlands has developed into a multicultural society. From this perspective, IMLI should be characterized as an element of cultural policy to a much greater extent than is the case at present. Because the multicultural society manifests itself differently at the local level, it seems natural to create scope for greater variety at the local level’

(Netelenbos 1995a : 27).

This view was further elaborated in the memorandum *Education in Immigrant Minority Languages (Onderwijs in allochtone levende talen, OALT)* by State Secretary Netelenbos, which focuses on primary education. Important elements of this memorandum are the recognition of the widely felt need for IMLI; the recognition of the personal and social importance of knowledge of immigrant minority languages; the recognition of government responsibility for the provision and the quality of IMLI; and the recognition of the importance of the home language criterion rather than the socioeconomic status criterion or the generation criterion for eligibility for IMLI. All these elements have been adopted from the above-mentioned report *Cedars in the Garden*. A new element is the emphasis on local language policy, which is a consequence of the new view of the roles and responsibilities of government, local councils, and schools.

In the State Secretary's conception, the *government* remains responsible for : a national policy framework (which is not further elaborated); earmarked funding of IMLI (to prevent improper use of allocated funds); national quality

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<sup>27</sup> See respectively SLO 1990 and Steunpunt Edukatie Molukkers 1990; SAC 1995; ABC 1995. For a well-documented overview of teaching materials, see Van Dijk & Lodeweges 1992.

control of IMLI (by the government inspectorate). The *local councils* are held responsible for : information about IMLI and IMLI needs assessment; selective allocation of IMLI funds to schools on the basis of proposals for IMLI submitted by schools; inter-school cooperation on IMLI for minor language groups; the involvement of immigrant minority groups as actors rather than as target groups only in establishing local IMLI policy. Finally, the *schools* remain responsible for : the implementation and quality of IMLI; the recruitment and employment of IMLI teachers.

Despite the positive attitude towards IMLI, the design and elaboration of some policy proposals remain unclear. First of all, this concerns the contents of the national policy framework. Here, the State Secretary distances herself considerably :

‘To be clear : a number of things that are now stipulated at the national level, such as minimum number of pupils, maximum number of hours a week, and identification of target groups and language groups, will cease to be laid down at the national level. It is conceivable that local councils, possibly under the supervision of the Union of Dutch Municipalities, will agree to draw up exemplary regulations to promote a proper balance between comparable opportunities and required variation in municipalities’

(Netelenbos 1995b : 17).

The distant and non-committal tone here may lead to inequalities in claims on IMLI and to a decrease instead of an increase in the legitimacy of IMLI. Furthermore, means for suiting practical actions to principled words are limited : though earmarking of IMLI funds is actually pursued, so are fixed budgets and liberty of spending. An auxiliary and an intrinsic function of IMLI are also distinguished, which in at least two policy proposals may lead to a negative representation of the intrinsic function : the auxiliary function of IMLI alone can be realized within regular school hours (the intrinsic function is to be realized outside school hours), and only this auxiliary function is embedded in quality and training requirements for teachers. Recent developments in Sweden (see below) also show that a decentralized government policy need not necessarily benefit the position of IMLI.

### 3.7 Sweden

Information about IMLI in Sweden is relevant for a number of reasons. Sweden has always made facilities for IMLI available in the context of a relatively strongly decentralized government policy. A historic landmark in government policy on IMLI is the Home Language Reform (*Hemspråksreform*) of 1976, which was approved by the Swedish parliament. Unlike in other continental European countries, no sizable labour migration from Mediterranean recruitment countries took place in Sweden in the sixties and seventies. As the concept of 'remigrating migrant-labour families' was lacking, the principled debate about IMLI and the implementation of the programmes has always been clearer and more straightforward in Sweden.<sup>28</sup> In addition, as a consequence of political and economic changes, the responsibility for, and the implementation of, IMLI was increasingly decentralized in the 1980s. This far-reaching decentralization process has fragmented this type of education to a far lesser extent than in Great Britain. However, the Swedish IMLI experiences of the last ten years indicate that IMLI has been confined to the barest essentials.

#### *Arguments and objectives*

Immigration policy in Sweden has three central objectives, which were accepted by the Swedish parliament in 1975 and reconfirmed in 1986 :

- 1) equality (*jämlikhetsmål*) : the same standard of living for immigrants and for the rest of the Swedish population;
- 2) freedom of choice (*valfrihetsmål*) : immigrants should have the opportunity to determine for themselves to what extent they wish to maintain or develop their original cultural and linguistic identity, and to what extent they wish to be absorbed into Swedish society;
- 3) cooperation (*samverkansmål*) : mutual understanding, tolerance, and solidarity between immigrants and the Swedish population are aims of decision-making on immigrant issues.

These objectives of the Swedish immigrant policy led to the Home Language Reform, which legalized the immigrant minority pupils' *obligation* to participate in instruction in Swedish as a second language and their *right* to instruction in a language other than Swedish that is spoken at home.

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<sup>28</sup> For a comparative history of the Swedish and the continental European immigrant policies, see Hammar 1981.

In organizing and improving education for immigrant minority pupils, it is still language education that is the main object. The most important objective is the acquisition of active oral and written bilingual skills and the development of a strongly bicultural identity. In stressing cultural arguments and bilingual objectives, Sweden distinguishes itself from most other continental European countries.

### ***Target groups and enrolment***

The target groups of IMLI are not defined in terms of (low) socioeconomic status, but in terms of home language background. The following groups are included: pupils who have one or two parents or guardians speaking a home language other than Swedish and who use this home language with their parents or guardians every day; pupils who speak Swedish as their home language, but who come from foreign schools; immigrant pupils who speak predominantly Swedish at home and require instruction in the language of the country of origin; pupils belonging to national minority groups (chiefly Lapps and Finns); pupils of Romany origin; adopted children with a mother tongue other than Swedish.

The Swedish education system consists of nine years of comprehensive education (*grundskola*) for 7- to 16-year-olds, and an optional two to four years of upper secondary education (*gymnasieskola*). In October 1990, 12 % (103,390) of the pupils in comprehensive schools and 7 % (20,290) of the pupils in upper secondary schools spoke a language other than Swedish at home. All in all, more than 130 different languages were spoken, Finnish, Spanish, and Arabic being the front-runners. 19 % of the pupils with a home language other than Swedish spoke no or hardly any Swedish; 65 % (66,900) of the pupils in comprehensive education with a home language other than Swedish were enrolled in IMLI, as were 50 % of these pupils in upper secondary school. For roughly 40 out of the 130 home languages, no IMLI of any kind was available, mainly due to the lack of qualified teachers or because the minimum number of pupils for a particular language was not being met in a municipality.

In Sweden, boards of primary schools are legally required to carry out the following activities every year: make an inventory of home languages other than Swedish spoken by any of the pupils in the school; provide information for parents of non-Swedish-speaking pupils – both in Swedish and in the most important local immigrant minority languages – about the importance and the possibility of IMLI; assess these parents' needs of IMLI for

their children; provide IMLI for a minimum of 5 pupils per language group per municipality (which requires schools to cooperate if demand falls below this minimum). This last numerical criterion is more generous than that of any other country in this study and it is often flexible. Table 3.7 presents an overview of possible eligibility for, and relative enrolment in, IMLI and Swedish as a second language in primary education in the autumn of 1994 for language groups with more than 500 pupils entitled to it.

**Table 3.7**

Eligibility for and enrolment in IMLI and Swedish as a second language in primary education in 1994

Language	Eligibility	Enrolment in IMLI	%	Enrolment in L2 Swedish	%
Albanian	2,838	1,255	44	2,123	75
Arabic	11,688	7,625	65	8,341	71
Assyrian	2,609	1,389	53	1,905	73
Bosnian/Croatian/Serbian	11,488	5,387	47	8,423	73
Cantonese	889	606	68	559	63
Chinese	876	454	52	512	58
Danish	1,023	151	15	231	23
German	1,430	582	41	211	15
English	4,537	2,454	54	1,340	30
Finnish	18,877	9,906	52	7,667	41
French	1,012	539	53	374	37
Greek	2,145	1,371	64	923	43
Hungarian	1,497	598	40	491	33
Italian	809	398	49	152	19
Kurdish	2,745	1,592	58	2,054	75
Macedonian	665	271	41	283	43
Norwegian	630	41	7	107	17
Persian	8,330	5,994	72	4,988	60
Polish	5,141	2,728	53	1,775	35
Portuguese	813	395	49	370	46
Romanian	816	266	33	388	48
Russian	857	400	47	510	60
Somali	2,059	1,348	65	1,803	88
Sorani	617	511	83	513	83
Spanish	9,631	6,075	63	5,058	53
Syrian	918	607	66	651	71
Thai	836	290	35	522	62
Tigrinya	1,516	1,024	68	1,054	70
Turkish	4,846	2,967	61	3,566	74
Vietnamese	918	494	54	746	81

Source : Swedish Bureau of Statistics 1995.

The relative enrolment in IMLI and Swedish as a second language shows a great many mutual differences. Table 3.8 contains the total data on primary and secondary education in 1994.

**Table 3.8**

Eligibility for and enrolment in IMLI in primary and secondary education, autumn 1994

	Grundskola	Gymnasieskola
Total number of pupils	916,661	309,952
Possible eligibility for IMLI	111,720	19,583
Actual enrolment in IMLI	61,306 (= 55 %)	7,160 (= 37 %)

*Source* : Swedish Bureau of Statistics 1995.

In view of the fact that IMLI is not compulsory and often extra-curricular, these enrolment figures are relatively high. Nevertheless, in the mid-1980s they were considerably higher (70 % and 50 % for primary and secondary education, respectively).

### ***Implementation and organization***

A child can enrol in IMLI for one language only, even if several languages are spoken at home in addition to or instead of Swedish. IMLI is not open to children that do not use the immigrant minority language in everyday life; however, some say that this should be changed. In the Swedish education system, there is still a clear-cut distinction between IMLI for children who speak a language other than Swedish at home and traditional language education. This is clearly exemplified by the fact that IMLI teachers of German are employed at other institutes and receive other kinds of training than teachers of German as a foreign language.

In contrast to most continental European countries, the parents' mother tongue is the language that is offered in education de jure. However, the national standard language is also offered de facto. In many – though not all – immigrant minority groups, the parents have a preference for instruction in the home language. The parents' wishes carry much weight. Sweden offers separate IMLI for Serbs, Croats, and Bosnians; children from Kurdish families

receive instruction in Kurdish if the parents so desire. In determining the criteria for eligibility for IMLI, the rules are bent more for some groups than for others. Indigenous minority groups, like the Sami and the Tornedal Finns, or children from Romany families, can also enrol in IMLI if their home language is not Swedish. Moreover, IMLI will often be made available to these groups if there are less than five potential participants in a municipality.

Every year, information is obtained about all individual pupils in the school for the so-called home language statistics (*hemspråkstatistik*). The headmaster or teacher will collect the following data on each individual pupil, with the aid of the parents if necessary : (1) the language used at home in addition to or instead of Swedish (only one language per pupil may be entered); (2) the need for, and enrolment in, IMLI; (3) the need for, and enrolment in, instruction in Swedish as a second language; and (4) a rough indication of proficiency in L2 Swedish compared to the proficiency of L1 Swedish speaking pupils in the class (no proficiency/ great difference/ clear difference/ small difference/ no difference).

The headmaster of a school must report the required number of teaching hours in Swedish as a second language to the municipal education department. In addition, the following information must be specified for each home language : (1) the required number of teaching hours per week; (2) the required number of home language classes; and (3) the estimated number of pupils in home language classes (a home language class is a class in which all pupils have a common home language other than Swedish).

The education inspectorate monitors the schools' and councils' compliance with legal obligations to provide IMLI where necessary. This is not to say, however, that the implementation of these rules and regulations always proceeds smoothly. Among the difficulties are the increasing decentralization of educational policy, negatively determined attitudes towards IMLI, the lack of qualified or available IMLI teachers, and the virtual absence of attainment targets and evaluations of IMLI.

In the majority of cases, IMLI instruction is scheduled in the afternoon outside regular school hours and generally takes two hours a week. Pupils may enrol in IMLI for a maximum of 7 out of the 9 compulsory years in their school career. Another kind of IMLI is organized in bilingual schools. In this case, pupils are in group 1-6 of comprehensive schools. The Finnish-speaking pupils may continue in groups 7-9. In bilingual schools, the home language largely functions as the instructional language. A minimum requirement is that half – or more in the upper forms – of the instruction is provided in Swedish. At the beginning of the eighties, around 15 % of the pupils who spoke a

language other than Swedish at home attended bilingual schools, but this is currently only 5 %. This decrease was predominantly caused by declining numbers of Finnish-speaking pupils in schools and the reduction in earmarked budgets for bilingual education.

In 1994, legal arrangements were made to allow for other ways of organizing IMLI. First of all, IMLI can be provided in comprehensive school for 1 hour a week, starting from group 3 (to a maximum of 470 hours for the entire period of comprehensive education). In group 7 (age 13), Swedish pupils can opt for an immigrant minority language instead of a second foreign language (usually German or French). They will then receive three hours of IMLI a week (to a maximum of 320 hours for the remaining comprehensive school period). A condition for such classes to take place is once again that there should be a minimum of five pupils in a municipality who wish to enrol and that there are IMLI provisions in secondary education. Little is known about enrolment in this new type of IMLI, but seeing that it has only recently been introduced, enrolment is still likely to be limited.

In Sweden (and Norway), pupils in primary schools do not get a mark for 'language' but for Swedish (and Norwegian); in addition, their progress in immigrant minority language proficiency is assessed. Swedish children from group 8 onwards get marks for their school achievements. Immigrant minority pupils who are still enrolled in IMLI at this stage are usually given a separate report mark for immigrant minority language proficiency. The status of this last assessment in determining a pupil's overall school achievement varies widely in different educational forms. In upper secondary school, pupils can opt for an immigrant minority language as their second (or third or fourth) foreign language.

The home language statistics that are annually collected are the most important basic data for local decision-making processes on educational policy in Sweden; they have immediate consequences for the organization and funding of IMLI. The central government supplies the local governments with funds. The role of the central government is limited to carrying out evaluative studies of school achievement, in particular cost-benefit analyses. Initially, IMLI funds were earmarked per pupil through the home language statistics. Lately, however, local authorities have gained more and more freedom to spend. At present, IMLI funds are no longer earmarked within the decentralized educational budgets. Abandoning the system of earmarked funds has actually led to cuts in IMLI that exceeded those in other school subjects in Sweden. IMLI was therefore more badly hit than the educational provisions for Swedish as a second language.

### 3.8 Conclusions

In all the countries involved in this study, there is an increase in immigrant minority pupils who speak a language at home other than the dominant school language in primary and secondary education. Education predominantly responds to this mismatch between home and school languages by paying more attention to the learning and teaching of the national standard language as a second language. A great deal of energy and money is being spent on developing curricula, attainment targets, teaching materials, and tests for second-language education. Instruction in immigrant minority languages of immigrant minority pupils stands out in stark contrast to this, as it is much more susceptible to an ideological debate about its legitimacy. While there is considerable consensus about the necessity of investing in second-language education for immigrant minority pupils, such consensus is entirely absent for IMLI. Immigrant minority languages are commonly considered sources of problems and deficiencies, and they are rarely seen as sources of knowledge and enrichment. Policy makers, headmasters, and teachers of ‘regular’ subjects often have a reserved or a negative attitude towards IMLI. On the other hand, parents of immigrant minority pupils, IMLI teachers, and immigrant minority organizations often make a case for having immigrant minority languages in the school curriculum. These differences in top-down and bottom-up orientation emerge in all the countries included in this study.

From a historical point of view, most of the countries in this study show a similar chronological development in their argumentation for IMLI. IMLI was generally introduced into primary education with a view to family remigration. In the seventies, this argumentation was virtually abandoned. Demographic developments showed no substantial sign of families remigrating to their former recruitment countries; instead, a process of generation forming and minority forming got underway. This development caused IMLI to be aimed at combating disadvantages. Defining immigrant minority groups as disadvantaged groups meant that IMLI had to bridge the gap between the home and school environment and to encourage school achievement in ‘regular’ subjects. Such an approach tended to undervalue ethno-cultural dimensions. In response to this, a number of countries emphasized the intrinsic importance of knowledge of immigrant minority languages and cultures from a cultural, legal, and economic perspective :

- in cultural respects, IMLI can contribute to maintaining and advancing a pluralist society;
- in legal respects, IMLI can meet the internationally recognized right to language development and language maintenance, given the fact

that many immigrant minority groups in society consider their own language of key value to their cultural identity;

- in economic respects, finally, immigrant minority languages and cultures may be an important pool of knowledge in a society that is increasingly internationally orientated.

The historical development of arguments for IMLI in terms of remigration, combating deficiencies, and cultural policy is particularly evident in the Netherlands, Germany, and Belgium. In France and Great Britain, cultural policy is tied in with the national languages French and English to such an extent that IMLI is only tolerated in its margins. In contrast to each of these five countries, cultural-political motives have taken pride of place right from the start in Sweden. It should, however, be stressed that cultural-political arguments for IMLI have not led to an educational policy in which the status of immigrant minority languages has substantially been revalued in any of the countries in this study.

The target groups of IMLI are considered deficit groups in virtually all the countries in this study; only Sweden has an explicit home language criterion rather than an socioeconomic or a generation criterion for admission to IMLI. Actual enrolment in IMLI varies widely not only between countries (cf. enrolment percentages in the Netherlands versus Flanders), but also between groups (cf. enrolment percentages of Moroccan and Turkish pupils versus those of Southern European pupils). Variation in enrolment is strongly determined by a combination of factors, such as the attitudes of immigrant minority parents and pupils, and indigenous majority headmasters and teachers, and the geographical distribution of immigrant minority groups (which will decide whether or not numerical criteria can be met). Comparative studies on the actual causes of this differentiated picture are not available.

There are also remarkable differences in status between IMLI in primary and secondary education in the countries of this study. A comparison of target groups, arguments, objectives, evaluation, enrolment restrictions, curricular status, funding, and teaching materials shows that IMLI in secondary education has gained a higher status than IMLI in primary education. In primary education, IMLI is generally not part of the 'regular' or 'national' curriculum, and consequently it tends to become a negotiable entity in a complex and often opaque interplay of forces by several actors, in contrast with other curricular subjects. These differences are outlined in Table 3.9.

**Table 3.9**  
Status differences between IMLI in primary and secondary education

Immigrant minority language instruction	Primary education	Secondary education
Target groups	<ul style="list-style-type: none"> <li>• <i>de jure</i> : mostly immigrant minority pupils from specific source countries</li> <li>• <i>de facto</i> : mostly subset of these pupils</li> </ul>	<ul style="list-style-type: none"> <li>• <i>de jure</i> : mostly all pupils</li> <li>• <i>de facto</i> : mostly subset of immigrant minority pupils</li> </ul>
Arguments	<p>mostly in terms of a struggle against deficits :</p> <ul style="list-style-type: none"> <li>• bridging the home/school gap</li> <li>• promoting school success in other ('regular') subjects</li> </ul> <p>rarely cultural policy :</p> <ul style="list-style-type: none"> <li>• promoting cultural pluralism</li> <li>• promoting knowledge of languages in a multicultural and international society</li> </ul>	<p>mostly cultural policy :</p> <ul style="list-style-type: none"> <li>• promoting cultural pluralism</li> <li>• promoting knowledge of languages</li> </ul>
Goals	rarely specified goals to be reached with IMLI	commonly specification of oral and written skills to be reached with IMLI
Evaluation	rarely judgement/report figure for IMLI : 'language' in school report = national standard language	examination and report figure for IMLI : national standard language is explicitly and separately denominated in school report
Minimal enrolment	relatively high number of pupils : specified per class, school or municipality	relatively low number of pupils : specified per class, school or municipality
Timetable status	not perceived as 'regular' education : instead of other subjects or at extra-curricular hours	regular optional subject in regular free timetable space
Funding	<ul style="list-style-type: none"> <li>• by national, regional or local authorities</li> <li>• by consulates/embassies of source countries</li> </ul>	by national, regional or local authorities
Teaching materials	rarely originating from country of settlement, often from abroad/source country	commonly originating from country of settlement

The higher status of IMLI in secondary education is largely due to the fact that instruction in one or more languages other than the national standard language is a traditional and regular component of the (optional) curriculum. *Within* secondary education, however, IMLI must compete with languages that, in their turn, have a higher status or a longer tradition. The hierarchy of languages in secondary education is schematically represented in Table 3.10 in descending order of status (1-5) :

**Table 3.10**

Hierarchy of languages in secondary education, in descending order of status (1-5)

	1	2	3	4	5
English	+		+		
German		+	+		
French		+	+		
Portuguese			+	+	
Spanish			+	+	
Italian			+	+	
Greek			+	+	
Dutch			+		
Danish			+		
Swedish			+		
Finnish			+	+	
Arabic				+	
Turkish				+	
.....					
Berber					+
Kurdish					+
.....					
1 : often compulsory subject 2 : often optional subject as 'second foreign language' 3 : national languages of EU countries, often supported by positive action 4 : immigrant minority languages, often offered to immigrant minority pupils only 5 : rarely offered non-codified immigrant minority languages					

With regard to category 5, it should be noted that some countries provide instruction and/or exams in non-standard language varieties : in France, for instance, one can sit state examinations for several varieties of

Arabic and Berber. Dutch primary education provides instruction in Moluccan-Malay (instead of Indonesian), and Sweden offers Kurdish (instead of Turkish).

Another remarkable fact is that funding of IMLI in primary education in some countries (particularly France, Flanders, and some German Länder) takes place through the consulates or embassies of the countries of origin concerned. In these cases, the national government virtually abstains from interference in the organization of and educational means for IMLI, and in the requirements for, and the selection and employment of teachers. A paradoxical consequence of this is that the earmarking of IMLI budgets by the above-mentioned consulates or embassies is often safeguarded. National, regional, or local governments often fail to earmark budgets, so that funds meant for IMLI are not infrequently appropriated for other educational purposes.

It is recommended that IMLI developments in different European immigration countries continue to be monitored and that the available literature be further analysed from a cross-national perspective. In the Netherlands, this would particularly concern the functioning of IMLI in a government policy in which responsibilities and resources are being devolved onto the local level. In France, government policy is centrally controlled. Germany has chiefly devolved responsibilities onto the Länder with all their differences. Sweden grants far-reaching autonomy to local councils in dealing with tasks and resources. In England, finally, there is a mixed system of shared national and local responsibilities (cf. the ministerial guidelines for special target groups versus the guidelines of the local educational authorities).

In general, cross-comparisons of experiences with IMLI in the various EU member states are rare. With a view to the demographic development of these states into multicultural societies, and the similarities in IMLI issues, more cross-national consultation about this field of government policy would be desirable. Language policy still takes place within the national perspectives of the EU member states. Proposals for a common EU language policy are laboriously achieved and non-committal in character.<sup>29</sup> The most important declarations, recommendations, or directives on language policy – concepts which each carry a different charge in EU jargon – concern the recognition of the status of: national EU languages; indigenous or regional minority languages; immigrant or ‘non-territorial’ minority languages (in the order mentioned).

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<sup>29</sup> See Coulmas 1991.

The Treaty of Rome (1958) confers equal status on all national languages of the EU member states as working languages (with the exception of Irish and Letzeburgesch). On numerous occasions, the EU ministers of education have declared that the EU citizens' knowledge of languages should be promoted.<sup>30</sup> Each EU member state should promote pupils' proficiency in at least two 'foreign' languages, and at least one of these languages should be the national standard language of one of the EU states. Promoting knowledge of indigenous or immigrant minority languages has been left out of consideration in these ministerial pronouncements. The protection and promotion of regional minority languages and cultures in the EU was recommended in the European Charter of regional languages and cultures. This Charter has led to the establishment of the European Bureau of Lesser-used Languages and the European MERCATOR network in order to stimulate research into, and instruction in, regional minority languages. It is remarkable that the teaching of indigenous or regional minority languages is generally advocated for reasons of cultural diversity as a matter of course, whereas this is rarely a major argument in favour of teaching immigrant minority languages.

In various EU countries, the old guideline of the Council of European Communities on education for immigrant children has helped to legitimize IMLI and has resulted in some legislation.<sup>31</sup> The application of this guideline in establishing target groups for IMLI has nowhere been as restrictive as in Germany. In Sweden, this guideline has never had any effect, as Sweden has only recently joined the EU. Meanwhile, the guideline needs to be updated, extended to pupils from non-EU countries, and given greater binding force for the EU member states. The increasing internationalization of pupil populations in European schools requires a language policy for *all* pupils, in which the traditional dichotomy between foreign language instruction for indigenous majority pupils and home language instruction for immigrant minority pupils is transcended.

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<sup>30</sup> See Baetens Beardsmore 1993.

<sup>31</sup> See *Directive 77/486*, dated 25 July 1977; see also Fase 1987.

## **Important literature by country**

### *Belgium*

The section on IMLI in Belgium/Flanders is mainly based on information from the Department of Education and the Flemish Educational Council (VLOR). Special thanks are due to Dr. Fernand Snytsers (Brussels) and Suzanne Unck (Tilburg).

### *Germany*

Artz & Cremer 1994; BAGIV 1985; Böcker & Thürmann 1991; Damanakis 1983; Gogolin 1993; KMK 1979, 1986, 1989 and 1995; Kranemann & Hillebrand 1993; LSW 1996; Luchtenberg 1995; Röhr-Sendlmeier 1986; Thürmann 1994. There have also been interviews with the Sekretariat der Kultusministerkonferenz (Bonn), with the Landesinstitut für Schule und Weiterbildung (Soest, North Rhine-Westphalia), and with the Regionale Arbeitsstelle zur Förderung ausländischer Kinder und Jugendlicher (RAA-Köln). Special thanks are due to Rob Aspenslagh (Clingendael Institute, The Hague), Arnold Hock (Cologne), Dr. Sigrid Luchtenberg (Dortmund University), Dr. Eike Thürmann (Soest) and Hella Rottenberg (*de Volkskrant*, Amsterdam).

### *France*

Ager 1993; Caldwell 1994; Cassius 1994; Cichon 1991. Much use was also made of information of the Ministère de l'Education Nationale, the Inspection Generale de l'Education Nationale, the Institut National des Langues et Civilisations Orientales (INALCO) and the Centre National d'Enseignement à Distance (CNED). Special thanks are due to Prof. Dominique Caubet (INALCO, Paris), Dr. Michel Neyreneuf (Paris) and Dr. J.J. de Ruiter (Tilburg).

### *Great Britain*

Bangs 1994; DES 1985 (*The Swann Report*); DES Working Group 1986; DFEE 1995a, 1995b and 1995c; Mackinnon et al. 1995; OFSTED 1994; Reid & Reich 1992. There have also been interviews with Local Education Authorities for London and Berkshire, with the Department for Education and Employment (London) and with the Commission for Racial Equality. Special thanks are due to Prof. Glenn Adelman (Reading), Halima Field (London), Frances Migniuolo (London) and Ken Ponder (London).

### *Netherlands*

Broeder & Extra 1995; Demirba 1990; Lucassen & Köbben 1992; Committee for Immigrant Minority Pupils in Education 1992; Netelenbos 1995a and 1995b. Much use was also made of information of the Ministry of Education, Culture and Science and the Inspectorate of Education. Special thanks are due to M. Nijdam (Ministry of Education, Culture and Science) and Dr. S. Özgüzel (Inspectorate of Education).

### *Sweden*

Boyd 1993; Broeder et al. 1993; Extra et al. 1992; Hyltenstam & Arnberg 1988; Hyltenstam & Tuomela 1996; Löfgren 1991; LPO 1994; Reih 1994; SÖ 1991; Swedish Bureau of Statistics 1995; Tingbjörn 1996. Special thanks are due to Dr. Sally Boyd (Göteborg), Prof. Kenneth Hyltenstam (Stockholm), and Peter Hedberg (Örebro).

### RELIGION

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*Thijl Sunier and Astrid Meyer*

#### 4.1 Introduction

Millions of immigrants have settled in Europe in recent decades. Growing numbers of them are from religious backgrounds that Western Europeans were hitherto unfamiliar with. We will not be dealing here with the many variants of Christianity from outside Western European traditions. We focus solely on the Islamic and Hindu religions. The Muslims are by far the largest of the two groups, and they are represented in all five of the countries we are studying. Hindus are found in significant numbers only in Great Britain and the Netherlands, and this is one reason why we devote less attention to Hindus. It is difficult to judge how many Muslims and Hindus live in Western Europe, but it is easier to say how many people are from *countries* with Muslim or Hindu traditions. This method yields a figure of nearly 6.5 million people of Muslim origin and about 460,000 of Hindu origin.<sup>32</sup> Tentatively this means that just under half of the immigrants in the five countries have Muslim or Hindu religious ties.

After the immigrants arrived in Europe, they proceeded to build religious institutions and facilities. Governments have felt compelled to respond to such developments. This chapter examines how each country responded to the arrival of these 'new' religions. Our description is confined to three topics. We first look at how governments came to acknowledge Hindus and Muslims as negotiating partners, how they created forms of public participation and advice in religious affairs. Our second focus is on policies that affect the establishment and funding of places of worship, and the third concerns policy on Islamic and Hindu presence within the education system. Two institutions are of interest here : religious education in state-run schools and the founding of schools on a Hindu or Islamic basis.

Our choice of topics does not mean that nothing is happening in other areas. Both Muslims and Hindus have asked for room to publicly express their faith in numerous other ways, such as the ritual slaughter of animals, recognition of religious holidays, and spiritual care in hospitals, the armed

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<sup>32</sup> The latter figure consists of 387,000 Hindus in Britain and 74,200 in the Netherlands.

forces and prisons. A number of such institutions have indeed been realized, but we do not go into them here. Literature study revealed to us that most of the initiatives, most of the debate, and most policy differences in the five countries are related to our three topics.

Before going deeper into these topics, we first describe briefly for each country the relationship between religion and state that prevails there, and the possibilities Muslims and Hindus have to exercise formal influence over politics, such as electoral rights. These two issues together form the context for the institutionalization of 'new' religions. Where policy exists on these issues, it is general policy.

## **4.2 Belgium**

The relationship between state and religion in Belgium diverges somewhat from that in the other four countries. In addition to the freedom of religion and separation of church and state laid down in the constitution, Belgium also has a system of formal recognition of religions. Recognition opens the door to a wide range of mainly financial advantages, such as payment of the salaries and pensions of religious officials, grants for the purchase, renovation and upkeep of religious venues, tax concessions, and exemption from postage. State-run schools are also required to provide religious instruction by representatives of the recognized faiths. The idea behind this extensive government involvement is that religions serve a social and moral need, and thereby promote the general well-being. Once a religion is legally recognized, a commission is instituted by law or royal decree to manage its material resources and to serve as a liaison body with the authorities. Local religious communities can then apply for recognition by decree.

Six religions are now officially recognized in Belgium: Roman Catholic, Protestant, Anglican, Jewish, Islam and Orthodox. Islam gained recognition in 1974 and the Orthodox religion in 1985. Formally recognizing a religion can have far-reaching consequences for the state treasury. In 1989 Catholics and Protestants received 2.4 billion and 70 million francs respectively for salaries and pensions of religious officials. As we shall see, such consequences have yet to be felt for Islam, notwithstanding its recognized status.

Most Muslims cannot vote, because they do not have Belgian nationality. Belgian candidates with Islamic backgrounds were chosen for the

first time in the municipal elections of October 1994, and a year later four such naturalized Belgians were installed in the Brussels regional council. It is not yet known what standpoints they adopt on religious issues.

### ***Recognition of Muslims as negotiating partners***

Some Belgian cities also have advisory councils for municipal policy, such as Antwerp's Council of Migrants. Members serve in an individual capacity and on the basis of their ethnic rather than their religious background. No officially recognized structures exist through which Islamic organizations can make known their views.

Beginning as far back as the 1960s, Muslims have made considerable efforts to gain recognition for their faith. One first step was the recognition of the Islamic and Cultural Centre (ICC) as an independent legal entity in 1968. A year later it was granted the use of the Oriental Pavilion in the Park of the Cinquantaire in Brussels, a complex that was to serve as a place of worship, a cultural centre and a coordination centre for mosques. The ICC was not initiated by local Islamic communities, however, but by the diplomatic representatives of predominantly Islamic countries, who also held seats in its governing body. The ICC has monopolized contacts with public authorities since the early 1960s. The justice minister consulted the imam who headed it about state recognition of Islam. The ICC is still the self-appointed representative of all Muslims in Belgium. It maintains close ties with Saudi Arabia, and for some Muslim groups in Belgium that is an unacceptable state of affairs.

Formally, the statutory recognition of Islam in 1974 gave it equal status to the Roman Catholic, Protestant, Jewish and Anglican faiths, but in practice there is no question of a truly equal status. This is basically because Islam has no government-recognized representative body, a so-called Executive. For a long time the ICC functioned as such, albeit without any legal basis. This de facto recognition of the ICC evoked protests from the predominantly Turkish and Moroccan local Muslim communities. The Belgian government itself was also divided on the position of the ICC. While the education ministry recognized it as the competent authority for Islamic religious instruction, the justice ministry refused to allot funds for ICC salaries and other facilities.

Muslims made several attempts in the 1980s to put together a representative body, but official government recognition and its attendant facilities were not forthcoming. In 1989 the process gained momentum when the Royal Commission on Migrant Policy (KCM/CRPI, see Chapter 2) began

actively intervening in the organizational structure of Islam. Although the Commission was not officially authorized in matters of religion, it believed such intervention was appropriate.

‘The fact that Islam is predominantly practised by foreigners can obviously give rise to frictions in the interaction between Belgians and migrants, as well as in the integration of their religious practices into Belgian society’

(KCM/CRPI 1989 : 390).

It presented proposals in November of the same year for a High Council of Muslims in Belgium, analogous to the ones existing for other faiths. The cabinet responded by appointing a Provisional Council of Experts whose task was to work out proposals for an organizational structure of Islam in Belgium. This ended the ICC's authorization. A year later the ICC organized, through the mosques, elections for all Muslims eighteen and older. The result was a General Council for Muslims in Belgium, which in turn chose a High Council for Muslims in Belgium. The elections were boycotted, however, by a number of Islamic organizations, and by the Turkish embassy. The Belgian government refused to recognize the High Council, because it considered the ICC's actions too hasty. However, the government-instituted Provisional Council of Experts had to be dissolved in 1992 due to poor functioning, and subsequent developments led to the provisional recognition two years later of an Executive nominated by the ICC's High Council. It still has limited powers, though, and the status of Islam in Belgium thus remains unequal to that of other faiths.

### *Places of worship*

There is no targeted policy in Belgium specifically for Islamic religious venues. As a recognized faith, Islam is eligible for partial grants for buying, building or renovating mosques. In practice, however, Islamic congregations have not received financial support from the government. This derives from the problems surrounding the establishment and recognition of a representative body. One exception is the ICC building and the affiliated Grand Mosque, allocated to the ICC for 99 years by royal decree. Most of the 210 or so other mosques in Belgium are funded by collections amongst the faithful. They are officially registered as non-profit organizations.

Local authorities supervise the establishment of religious venues. They can influence the location of such venues by means of building permits and safety regulations. Other considerations can also play a part, as in 1988 when the Moroccan community in Antwerp applied for a renovation permit for a building it wanted to use as a cultural centre. Because it also planned to designate part of the building as a place of worship, the application was rejected. The mayor claimed that the eighteen mosques in Antwerp were already more than enough.

Curiously, the anti-immigrant Flemish Block put forward a mosque plan for Antwerp in 1990, which it claimed was suitable for application in all cities with comparable problems. The Block had won a substantial share of the votes in the 1988 municipal elections and had since gained considerable influence over local policymaking. It seized upon every relocation of a mosque to challenge the mosque's permit. In its own plan, all mosques would be replaced by one central, temporary one and placed under the supervision of the local authority. The actual aim was to set apart and isolate the various Muslim congregations. Other Belgian municipalities such as Schaerbeek and Beringen have stipulated that mosques may be used solely as places of worship, and not as cultural or fellowship centres. Political struggles surrounding the founding of mosques have been known to drag on for years in some Belgian municipalities. One Pakistani organization in Brussels has been negotiating with the local authority for two years now on its plans to start a mosque.

## ***Education***

### *Islamic religious instruction*

Great importance is attached to religious education in Belgian state schools. Instruction is fully funded by the state, and state schools are required to organize it if a parent so requests – provided the religion in question is state-recognized. Religious education falls under the authority of governing body of each religion, and it nominates religion teachers to the Ministry of Education.

The recognition of Islam in 1974 thus opened the door to Islamic religious instruction. In July 1975, the education ministers issued a circular to the heads of schools, requesting them to make available a course in Islamic religion and morality in the 1975-76 school year, should parents request it. This was the beginning of an experimental period; statutory arrangements to allow Islamic religious instruction were not finalized until 1978. The number of Belgian primary schools teaching about Islam grew from 93 in 1977 to 730 in 1987, despite a host of practical problems due to the lack of a recognized

representative body. In 1986 two Brussels municipalities used that fact as grounds to withdraw their cooperation in Islamic instruction. When twenty Muslim parents challenged this in a lawsuit, the district court ruled that the constitutional requirement to teach religion equally applies to Islam.

At the request of the Provisional Council of Experts, the Belgian cabinet recognized a Technical Committee in 1990 charged with appointing or reappointing teachers for Islamic instruction to begin in the school year 1990-91. This decision terminated the ICC's authority to appoint teachers, and it was tantamount to government intervention in the organizational structure of Islam, since legally only the governing body of a religion is authorized to nominate teachers. In the event, successive commissions failed to function adequately, and since 1994 the commission's role has been taken over by the Executive of Muslims in Belgium, the provisional liaison body between Belgian Muslims and the national authorities. However, since the Executive's powers are limited to nominating teachers, numerous other matters such as teacher training, syllabus planning, residence permits, employment contracts, and inspection remain badly regulated or not at all.

### *Islamic schools*

Belgium has both state-run and privately run ('free') schools. To be eligible for state funding, schools must meet a range of criteria, including an explicit curriculum, a minimum number of pupils, and willingness to allow state inspection. The founders are responsible for finding a suitable building, and this proves to be one of the main stumbling blocks. The first – and so far the only – school based on Islamic principles is the Al Ghazali School in Brussels, established in 1989 on the initiative of the ICC. The appearance of this school touched off heated debates, mainly in the media. Some people urged modification of existing legislation, and the constitution if need be, to call a halt to the founding of Islamic schools. However, Education Minister Grafé insisted from the outset that educational freedom also applies to Muslims: 'Anyone may start a school and get it funded as long as they comply with the legal criteria' (*De Morgen*, 2-9-89). Recognition and funding was indeed forthcoming after a series of visits from the education inspectorate. The ICC had initially planned to start a Dutch language Islamic school in Antwerp, but practical problems (mainly of a financial nature), as well as fear of 'hostile reactions', led it to abandon its plans.

### 4.3 Germany

The relationship between the state and religion in Germany is a matter not only for the federal government. The *Länder*, too, have statutory provisions on the exercise of religion and other ideological convictions. They even enjoy a great deal of autonomy in this area, and can determine much of their own policy. At the federal level, there are two key constitutional principles that govern the relations between the state and religions : neutrality and parity. The former entails that the state must take a neutral stance towards all faiths and not intervene in debates on theological doctrines. It is not to express any opinion on religious ideas and principles as long as they remain within the law. The second principle requires that all religions be treated equally. In practice this not only means that no privileges are granted to specific religious communities, but equally that no action is undertaken to *ensure* equitable treatment of religions. Nevertheless, separation of church and state in Germany is not as strict as in countries like France and the Netherlands. Beyond traditional government obligations to pay officials of recognized faiths, subsidize upkeep and restoration of church buildings, and provide tax facilities, an institution known as the church tax plays a critical role in the church-state relationship. The state collects taxes in the name of each recognized religious community, then channels them back to those communities. All registered members of a community are taxed. The right to levy church taxes is limited to communities recognized as public law corporate bodies (*Körperschaften des Öffentlichen Rechts KÖR*). In principle other religions can acquire public law status as well, but at present it is confined to the Roman Catholic, Protestant and Greek Orthodox churches and the Jewish community. Should Islam attain recognition in the future as a public law body, only Muslims would be taxed on its behalf. It would not mean that non-Muslims would pay taxes for Islam, as some opponents have been known to claim.

Legislative authority for church taxation is in the hands of the *Länder*. The role of the state in collecting these taxes is laid down in the German constitution. The purpose of the tax is to defray the costs of churches. The right to levy church taxes is formally distinct from any actual state funding of religions. The state is only involved here as a mediator in the collecting of taxes.

A number of Islamic organizations have made applications for public law status in the past. The first application, lodged with the state of North-Rhine Westphalia, prompted the *Länder* to hold an informal meeting to coordinate future decisions regarding such applications. Not one Islamic

organization has yet succeeded in obtaining public law status. German law states that recognition can be granted only to an institution or organization that is representative of the community it claims to speak for. It must also be of a permanent nature and must endorse the principles of the German constitution. These conditions have proved to be obstacles to the recognition of Islam.

Although Islam is regarded as a 'religious community' (*Religionsgemeinschaft*) – a recognizable group of people who feel bound to one or more gods and express this through rites – to acquire recognized corporate status it also has to qualify as a 'religious society' (*Religionsgesellschaft*). The latter term refers to the external, organizational features of a religious community. It is a representative, permanent body concerned with the public exercise of the religion. As a result of Islam's rather decentralized structure in Germany (and elsewhere in Europe), it is difficult for it to satisfy the requirement of representing an entire religious community. Islam is organized in a large number of independent associations and foundations that are not accountable to one another. In view of the relatively recent origins of German Islamic organizations, the requirement of permanence forms another stumbling block, which is further compounded by the government's persistent denial that Germany is an immigration country. Some opponents even argue that Islam is irreconcilable with the German constitution. They accuse it of fostering inequality between men and women and potential loyalty to authorities other than the constitution. In view of such objections, it is unlikely that Islam will obtain public law status at any time in the near future. It must be added that negative public perceptions of Islam play a major part in this.

In comparison with the other four countries we are examining, it is not easy for foreigners to acquire German citizenship (see Chapter 2). Naturalization is comparatively rare, with just 0.7 % of the total number of foreign nationals being naturalized in 1993.<sup>33</sup> Discussion about municipal voting rights has also virtually died out since 1990. Muslims thus have few opportunities to exert influence on formal political decision-making.

### ***Recognition of Muslims as negotiating partners***

Churches and trade unions play major advocacy roles, but unlike countries like the Netherlands, Germany has no extensive network of social and welfare institutions that can promote the interests of immigrants at the federal level. Some cities with large immigrant populations have Foreigners'

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<sup>33</sup> See Thränhardt 1995 : 96; see also Chapter 1, Table 1.1.

Auxiliary Councils, advisory bodies elected by immigrants. Because Islamic organizations have large, active constituencies, they have been successful here and there in getting representatives elected to these local councils.

Germany also has several interethnic umbrella organizations of Islamic groups – the Islam Council of the Federal Republic of Germany and the Central Council of Muslims in Germany, both based in Cologne, and the Islamic Council in Frankfurt. Though government authorities do maintain contacts with these organizations, they have no official status that could help them exert real influence on policy.

### *Places of worship*

Like Belgium, Germany provides no public financial support to Islamic communities, since they are not recognized as public law bodies. On the whole there is also no active policy on religious venues. The needs and desires of Muslims are generally not taken into account in urban planning, though the extent of this varies between cities. Local authorities do tend to speak of Muslims as fellow citizens, and they observe an unwritten rule that places of worship should have half a square metre of space for each community member. Many local authorities, however, are apprehensive about negotiating with certain Muslim groups because of perceived fundamentalist influences.

The large Muslim community of Duisburg, for instance – 10 % of the population – faces a serious shortage of mosques. Until a few years ago this need was ignored in urban planning, while the needs of Christians were taken into account. Even already existing mosques were omitted from planning schemes. After a local estate agent intervened, the authorities began tolerating existing mosques, but no active policy has been adopted to alleviate the shortage. Cities like Frankfurt have expressed fears that mosques will harm the character of the old town centres.

Stuttgart is an exception. The city council there is formulating a policy on mosques and are encouraging the establishment of an advisory council of Islamic groups to serve as a liaison body with the local authority. Rotterdam, a city that already has a platform of Islamic organizations, has been taken as a model.

## ***Education***

### *Islamic religious instruction*

Religious instruction falls under the jurisdiction of the *Länder*. In the 1970s instruction on Islam was introduced sporadically in several *Länder* under programmes for immigrant minority language instruction. It soon gained momentum as part of an effort to counterbalance the spread of Koran schools set up by groups like the Süleymanlis<sup>34</sup> (who had been cast in a bad light at the time). In North-Rhine Westphalia a syllabus for teaching Islam was drawn up in collaboration with the religious affairs directorate of the Turkish government, the Diyanet. Since no set amount of time is prescribed, however, the extent of the instruction depends on the language teacher. It can range from a few minutes to a large part of the lessons.

In more general terms the introduction of religious teaching depends on the public law status of the religion in question. To be entitled to teach, a religious community is required to have a recognized representative body that can serve as a liaison with the authorities. It must be able to guarantee that the syllabus, the instruction and the professional qualifications of the teachers are in keeping with the basic principles of the religion being taught. The organization must have the status of public law body or registered society (*eingetragener Verein* or *e.V.*, a society or foundation under private law). As we have seen, Islam has no public law corporate status.

There are only two *Länder*, Bremen and Berlin, that have placed teaching in the hands of religions or ideological communities themselves. The authorities there just provide the necessary facilities. In Berlin an alliance of Islamic organizations, the Berlin Islamic Federation, applied for registered society status, but it was turned down on the grounds that there was insufficient agreement among Berlin Muslims. To make Islamic teaching possible after all, the Berlin Senate concluded an agreement with the Turkish Consulate by which Turkish children receive two hours a week of Islamic cultural and ethical instruction on a volunteer basis, in addition to their Turkish language classes.

In Bavaria, Islamic religious instruction is classified as a 'standard subject' on the curricula of state schools.

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<sup>34</sup> For a description of this organization see Landman 1992; Sunier 1996 : 52, 57, 62-67.

### *Islamic schools*

Each German *Land* sets its own requirements which religiously based schools must satisfy to be entitled to recognition and state funding. The application must normally be submitted by a recognized representative body. Because Islam has no such body, North-Rhine Westphalia has ruled out the establishment of Islamic schools, whereas Berlin has scrapped the requirement.

A further requirement is that newly established schools have to survive on their own revenues for the first six years. If the school has proved itself viable by then, it can receive state recognition and funding. The first Islamic school in Germany was founded in Berlin in 1989. It has recently gained recognition and is now being funded by the Berlin authorities.

## **4.4 France**

The French constitution is based on strictly secular principles which prescribe an absolute separation of church and state. Article 2 stipulates that the Republic may not recognize nor fund any religion. This rules out any general financial assistance by the state. For historical reasons, the situation in Alsace and Lorraine is different. The Catholic, Protestant and Jewish communities benefit there from arrangements dating from the 19th century by which the state pays for the salaries of recognized religious officials and for the upkeep and restoration of religious venues. Recent moves have been made to obtain similar funding for Islam. In the rest of the country, the church-state separation is less strictly observed than the constitution would lead one to believe. We shall return to this point later.

Almost half of the Muslim immigrants to France now have French nationality and are therefore eligible to vote and stand for office.

### ***Recognition of Muslims as negotiating partners***

Notwithstanding the large numbers of Muslims on French soil, it was not until 1990 that the government felt compelled to address certain matters. In response to the Rushdie affair and an uproar about headscarves in schools, the Minister of the Interior appointed a Study Council on Islam in France (CORIF) to advise the government on Islamic issues. It was composed of fifteen members, including the foremost leaders of Islamic organizations and Muslims

from academic circles. By creating the CORIF, the government hoped to short-circuit the pretensions of the rector of the Grand Mosque of Paris, who was claiming to represent all Muslims to the French authorities. The CORIF was meant to be a representative negotiating partner, the mouthpiece of Islam, analogous to the Representative Council of French Jewish Institutions (CRIF). A number of practical matters were dealt with at the CORIF's instigation, such as the allocation of cemetery sections for Muslims and the serving of halal meat in the armed forces.

From 1993 on, however, the CORIF was increasingly sidelined in favour of the Grand Mosque. The rector of the mosque initiated the National Representative Committee of Muslims in France, which included all the major Islamic organizations in the country. When this led to controversy between the Grand Mosque and rival umbrella organizations like the National Federation of French Muslims (FNMF), it was superseded two months later by the Consultative Council of French Muslims, which gained the support of the interior minister. The differences of opinion between the various groups – none of which were elected bodies – were part of a struggle for power and authority. Interior Minister Pasqua officially recognized the Council as a government liaison body in early 1995. On this occasion it was renamed the Representative Council of French Muslims (CRMF). This sealed the fate of the CORIF.

At the local level, developments in Marseille are worth noting. On the initiative of the mayor, a religious council known as the Marseille Espérance came into being in 1990 which included Muslim, Catholic, Protestant, Jewish, Greek Orthodox and Buddhist representatives. It mediates between the local authority and the community in matters of religion. It has been able to avert demolition of a Romany place of worship, and it has mediated in the founding of a mosque.

### *Places of worship*

Despite the strict separation of church and state in France, some possibilities for state aid do exist. Since 1961, departments or municipalities may stand guarantor for loans to cultural or religious organizations for the construction of meeting places. Municipalities are also permitted to lease out land for a symbolic charge. This is usually done in the context of urban or community development projects. In 1976, the Secretary of State for Foreign Workers emphasized in a circular that such facilities also applied to Muslims. The aim was to help them preserve their identity. Here and there Muslims have

taken up such opportunities, but in practice the founding of a mosque is no routine matter and has triggered heated reactions on many occasions. Some distressing examples were Charvieu-Chavagneux, where in the summer of 1989 the mayor ordered the bulldozing of a mosque that had been built without a permit, and Libercourt, where the expansion of an existing mosque was subjected to a public referendum in 1991. Numerous other local authorities have either blocked or indefinitely delayed the establishment of mosques. In Lyon, Muslims had to negotiate for nearly ten years about the location of a mosque. When agreement was near, the local authority decided to change the zoning plan, causing a further delay.

In the light of developments in the Muslim world, and Algeria in particular, the attitude of some municipal authorities appears strongly governed in recent years by the question of whether mosque associations it is dealing with have ties to radical Algerian groups such as the FIS or GIA. As a tactic to counter 'fundamentalism', some local authorities that formerly opposed the founding of mosques have now started cooperating. The idea is that this may discourage influence from abroad and promote integration. The Paris suburb of Créteil recently even put up a subsidy for a mosque.<sup>35</sup>

## ***Education***

### *Islamic religious instruction*

Religious education cannot be offered as a standard subject in state school curricula. Whatever the religion, it can only be organized after school and at parents' expense. Schools are supposed to give assistance on request, but that is limited to providing space. In practice, as far as we can ascertain, no Islamic religious education is available anywhere in France outside school hours. Islam does receive attention in some schools as part of minority language teaching or intercultural courses.

### *Islamic schools*

As in Belgium and Germany, religiously based schools in France can receive public funding. In practice it is mostly Catholic schools that receive partial funding, along with a small number of Jewish ones. Privately run schools make up 15 % of all schools in France.

We have not encountered a single Islamic school in our study that is recognized and subsidized by the government. Both the rector of the Grand

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<sup>35</sup> *Le Monde*, 21-2-96.

Mosque and the head of the Union of French Islamic Organizations have been campaigning for years for the establishment of Islamic schools. A number of formidable obstacles still exist, mainly of a financial nature. School fees for privately funded Islamic schools would come to 25,000 francs per pupil per year, and starting a school has considerable financial consequences even when it is entitled to subsidies. Like Germany, France requires a probationary period for new schools to prove they are viable. During this period of five years (or less in areas of rapid urbanization), schools are expected to pay their own way. Beyond this condition, schools must satisfy many other requirements to be eligible for state funding, such as qualified personnel, state inspection and a curriculum that conforms to national standards.

#### **4.5 Great Britain**

We confine ourselves in this section to England, since the situations in Scotland and Wales differ in a number of significant ways. In any event, most Hindus and Muslims live in England. England has no constitution nor any other general statute regulating the relationship between the state and religion. There is no formal recognition of religions as in Germany and Belgium, nor is the state founded on secular principles as in France and the Netherlands. England has a state church, the Church of England, headed by the monarch. The dominant position of the Church of England shows up most clearly in its presence in the House of Lords and in the great influence it has on religious affairs in general. Though it is the state church, it is not funded by the state. Its privileged status derives from its historically acquired social and political position. This in itself does not give it financial advantages. Although the status of other religious communities is less privileged, many of the arrangements that apply to the Church of England are also open to other faiths. That is the case, for example, with the spiritual services in the armed forces, prisons and hospitals. One of the few laws pertaining specifically to the Christian religion is the one prohibiting blasphemy, which protects Christianity only.

The vast majority of Muslim immigrants are British nationals and are thus eligible to vote and stand as candidates in both municipal and national elections. In some local councils the numbers of Muslims have been slowly increasing since the 1980s, but this is not yet the case at the national level. Both the Conservatives and the Liberal Democrats fielded several Muslim candidates in the 1992 general elections, but in places where they stood no

chance of election. That year also saw the inauguration of the Islamic Party of Britain. The party aroused little enthusiasm and drew no more than a handful of votes.

### ***Recognition of Muslims and Hindus as negotiating partners***

At the municipal level there are various ways to exercise influence over policy. Residents can join advisory bodies such as the Community Relations Councils (CRCs) in an individual capacity. Another option is the Inner Cities Religious Council (ICRC) set up by the government in 1992 to advise it on problems in older city districts. It is composed of representatives of Christian, Hindu, Jewish, Muslim and Sikh communities and meets three times a year. Strictly speaking it does not deal with matters of religion. Rather, by involving and consulting leaders of various faiths, the government hopes it will help improve contacts between state authorities and the general public as a way of tackling social problems. Local umbrella organizations of Muslims and Hindus have also been formed in some cities to serve as a mouthpiece and advocate vis à vis the authorities. The Bradford Council for Mosques (BCM) is one such initiative, and it was warmly welcomed by the local council, which had just been drawing attention to the poor political representation of ethnic minorities. The Bradford authority provided an initial grant to the BCM, which promotes Muslims' interests in many areas, especially education. Many local initiatives have succeeded because local council members either belonged to the CRC or BCM or worked closely with Muslims active in them.

Prompted by the Rushdie affair, Islamic leaders met in July 1989 with Home Secretary Hurd and his Secretary of State Patten. The main issues raised by the Muslims were the extending of blasphemy legislation to cover Islam, the needs of Muslim children in state-run schools, and government funding for Islamic schools. Patten replied in an open letter a month later that extension of the blasphemy law was not feasible. It had been seriously considered, but had been rejected by the Church of England. As we shall see later, the government had little to offer, either, in the sphere of education.

### ***Places of worship***

No subsidy arrangements for religious venues exist at the national level in England, but the opportunity does exist, under the Places of Worship Registration Act dating from the 19th century, for Islamic mosques and Hindu mandirs to register as charities, qualifying them for tax reductions. Registration is not obligatory, but many religious organizations register for

financial reasons. The use of a building as a place of worship must be approved under the Town and Country Planning Act. The procedure is in the hands of the Local Authority Planning Committees, and, just as in the other four countries, permission depends on municipal zoning regulations, considerations of public order, and general policy on integration and ethnic relations. Since altering a zoning plan is time-consuming, many organizations try to get round it by choosing a venue that has previously also served as a place of worship, in which case no permission is needed. Another source of funding for Islamic organizations has been national or municipal level grants for building maintenance or language teaching.

Local authorities respond in divergent and ad hoc ways to applications by Muslim and Hindu organizations to set up places of worship. In many cases permission is granted only temporarily or on grounds of special circumstances. Local councils with small Hindu and Muslim populations are especially unlikely to have developed specific policies on the matter. Some authorities have formulated policy in great detail. Birmingham was one of the first to initiate target group policies on the founding of mosques, and these have been copied by towns like Leicester, Stoke-on-Trent and Sheffield. The Birmingham policy was initially rather restrictive. Permission was temporary, use of the venue was limited to set times, it had to be in a detached building, no alterations were allowed, and sufficient parking space was to be available. This led to many applications being rejected, and some applicants lodged appeals with the secretary of state. When he decided in their favour, Birmingham relaxed its restrictions. The new policy includes incentives for building new mosques to serve larger areas and more flexible requirements for converting older buildings into places of worship.

## ***Education***

### *Islamic and Hindu religious instruction*

In contrast with Belgium, the English authorities are not required to provide for non-Christian religious instruction in schools. In state schools there is but one required subject on religion : general Christianity. It consists of common prayer and religious instruction based on a so-called agreed syllabus, which is drawn up by an Agreed Syllabus Conference appointed by Local Education Authorities (LEAs). This committee is made up of representatives from various sectors, including teachers' unions, various religious groups in the region, the Church of England and the LEA. The LEA has the decisive voice and bears responsibility for the content of the

instruction. There is no room for Islamic or Hindu instruction in the ordinary school day. School governing bodies are authorized, but not required, to provide facilities for such classes after school. Parents do have the right to withdraw their children from religion classes.

In the late 1960s, some local authorities made changes to the content of religious instruction. Purely Christian teaching made way for a multireligious approach, and in some places Muslims and Hindus were given a voice in the agreed syllabus. The Education Reform Act of 1988 put an end to this process, stipulating that religious education should be 'mainly Christian' in nature. All LEAs were ordered to revise their agreed syllabi. In July 1992 the government issued proposals for new education legislation. Local authorities that had not yet adapted their syllabi to the 1988 law were admonished to do so. The Christian emphasis in the legislation was reiterated.

### *Islamic and Hindu schools*

In addition to ordinary state-run schools (county schools), England also has religiously based schools that receive state funding. The latter category can be subdivided into 'controlled', 'special agreement', and 'voluntary aided' (VA) schools, depending on the measure of autonomy their governing bodies have and the amount of public funding they receive. Most are Christian schools and a few are Jewish. Since the 1970s Muslims have made a number of attempts to secure VA status for Islamic schools; we know of no such initiatives by Hindus. Applications for state funding of Islamic schools have met uncompromising resistance from the education ministry and have repeatedly been rejected.

A much publicized case was the application by the Islamia Schools Trust (IST) in the London borough of Brent. An initial application was honoured by the Brent local authority in 1986 after extensive deliberations, and was sent on to the education ministry. The Secretary of State then turned it down on the grounds that the school was too small to be viable. Subsequent plans to expand the school were delayed at first by the Brent Planning Sub-Committee, but a building permit was finally issued in 1988 and a new application was made to the ministry. This was once again rejected in 1990, this time on the grounds that Brent had empty places in existing schools which needed to be filled first. The IST took the matter to court. The High Court ruled in 1992 that the Secretary of State's decision was characterized by 'manifest unfairness' and that the application was to be reconsidered. It was nevertheless rejected again a year later on similar grounds. Had the initiative

succeeded, it would have set a precedent for new applications. The rejection thus seems to be prompted more by a fear of the spread of Islamic education than with empty desks in neighbouring schools. Numerous other applications were also rejected during the ten-year period in which the IST was struggling to achieve VA status.

For the time being, then, obtaining state funding for an Islamic school in England appears impossible in practice, in spite of the opportunities provided by the law. Those opportunities were even formally expanded in 1988, when the so-called grant-maintained (GM) status was created in addition to those already available. Both state-run and privately run schools can apply for GM status. If it is approved, the schools then operate independently of the LEA and are funded directly by the ministry. A number of private Islamic schools are now investigating this possibility.

#### **4.6 Netherlands**

The relationship between religion and the Dutch state is governed by three major principles : freedom of religion, equality of all religious groups, and separation of church and state. The first two principles are explicitly guaranteed by the constitution, and the third derives from them. In practice, church-state separation is not absolute. Although most historical ties between church and state have been broken, some relations, mainly financial, continue to exist. Moreover, regulations dating back to the 'pillarized' (*verzuild*) denominational system still enable religiously oriented institutions such as schools and broadcasting corporations to obtain public funding. The emphasis placed on the principle of equality in the 1983 constitutional revisions has strengthened the negotiating position of Muslims and Hindus in the Netherlands. The authorities can hardly deny facilities to Muslims and Hindus that they provide to other religious communities. At the same time, however, the disentangling of church-state relations has made government support to all religious groups, including Muslims and Hindus, a difficult matter. The relationship between religion and the state was the theme of a high-level conference in 1983 attended by the Prime Minister, the Minister of Home Affairs, the Minister of Welfare, Public Health and Culture, and representatives from Christian denominations, the Humanist Society, and Islamic and Hindu organizations. Although no concrete agreement was reached, it was a significant occasion. It was the first time that Islamic and

Hindu organizations had ever been invited to discuss matters still unsettled after the severing of the 'silver braids' that bound religion and the state.

The Netherlands is the only one of the five countries studied here that allows foreign nationals to vote and stand for election at the municipal level. The number of residents with a Muslim or Hindu background that hold Dutch passports, and thus have national electoral rights, is small compared to England and France, but it is growing rapidly. More and more immigrants have been opting for naturalization since dual nationality was made possible in 1991. At present almost 30 % of Turkish and Moroccan residents have dual nationality. Unlike in England, where Muslims and Hindus wield considerable political influence, especially at the municipal level, these immigrants have not formed much of a power base in the Netherlands, even with their local rights of suffrage. Several attempts at setting up Islamic parties have failed due to lack of interest.

### ***Recognition of Muslims and Hindus as negotiating partners***

Although the authorities would certainly like to have a central liaison body for Muslims, none has yet been recognized as such. The Minister of Home Affairs invited a large number of individual Islamic organizations for consultations in the aftermath of the Rushdie affair. Around the same time, a group of Muslims set up the National Islamic Committee (ILC), backed by a broad array of Islamic organizations. It issued a statement dissociating itself from Khomeiny's fatwa. The home ministry held two more meetings with the ILC and nothing else happened. Later the ILC participants more or less split into two new councils, the Islamic Council of the Netherlands (IRN) and the Netherlands Muslim Council (NMR). No formal consultations occur between them and the government. Since 1996, Hindus do have an umbrella organization that is meant to serve as a liaison body with the authorities.

Advisory councils for *immigrant* policy do exist at the national level. They are organized along ethnic lines and have representatives in the National Advisory and Consultative Body on Minorities (LAO). The same types of institutions can be found in other countries, though mostly at local levels. What makes the Dutch arrangement noteworthy in international terms is that the seats on these advisory councils are not filled in a personal capacity, but by delegates from affiliated organizations. Partly as a result of efforts by the home affairs ministry, Islamic organizations are well represented, and thus have formal influence on policymaking. The ministry has also made unsuccessful

attempts to get the Alliance of Moroccans and Tunisians (SMT) to admit the Union of Moroccan Muslim Organizations (UMMON) to its ranks.

At the local level, a few formalized advisory procedures have been instituted specifically for Muslims. One such subsidized advisory body in Rotterdam, the Rijnmond Platform of Islamic Organizations (SPIOR), represents the great majority of local Islamic groups. Unlike the German Foreigners' Auxiliary Councils, it is not an elected body. It might rather be called a service bureau and a joint liaison body for the local authority. The Hague has a similar platform, but it still lacks the coordination of the Rotterdam one.

In Utrecht, in 1972 the first Dutch city to set up an advisory body for immigrants, specifically Islamic organizations were long kept out of the political arena. The official reason was that only subsidized organizations could be represented, and since Islamic groups were receiving no state subsidies they were not entitled to representation. The local authority did have cause to consult them on occasion, however. In 1989, they were invited to formulate regulations for the call to public prayers. On this occasion the Islamic groups expressed their desire to meet with the authorities more regularly. This resulted in the short-lived Platform of Islamic Organizations. In its first and only meeting with the Utrecht authority, the latter announced it would not be subsidizing the platform, which then proved not to be viable. Some movement towards change does seem evident since 1994, when a new municipal executive was installed. In a new plan for an Advisory Group on Ethnic Minorities, room has been reserved in principle for representatives of Islamic organizations.

### *Places of worship*

Compared to the other countries studied, the Netherlands made considerable efforts before 1983 to help realize places of worship for Muslims and Hindus. Muslims, especially those of Turkish and Moroccan origin, were able to profit from several national subsidy arrangements. A total of 101 mosques availed themselves of these opportunities, receiving amounts ranging from 3,000 to 57,000 guilders. The new mosque at Almelo, for example, came into being as the result of a partial grant under the Church Construction (Subsidies) Act (1962-1982). This law had originally been intended to clear up some of the confusion whereby some municipal authorities were subsidizing the building of churches and others were not. It initially was to target Christian

places of worship, but an amendment proposed by the Social Democrats extended the benefits to non-Christian faiths.

While this act was essentially still a general policy measure aimed at equal treatment for all religions, the General Grants to Places of Worship Scheme (1976-1981) and its successor the Temporary Scheme for Grants to Muslim Places of Worship (1981-1983) were clearly motivated by policies targeting Mediterranean immigrants. Surinamese Muslims were expressly excluded. At the same time, it was stipulated that only those mosques were eligible that were open to all Muslims – a rather unrealistic demand given the ethnic and ideological divisions among the various Islamic organizations.

The so-called Waardenburg Working Party advised the government in 1983 to extend subsidy arrangements to all groups being targeted by immigrant policy, taking into account the existing ideological and ethnic diversity. The government *Minorities Memorandum* of the same year repeated these recommendations. Nevertheless, a majority in Parliament consisting of Liberals and Social Democrats believed such funding to be in conflict with the separation of church and state (the Wiebenga-Dales motion, 1984), and blocked a new scheme for the funding of religious venues. Later recommendations by the Hirsch Ballin Committee (1988), which urged limited opportunities for funding, were again ignored, this time by Minister of Home Affairs Dales. The argument now was that there was no longer an urgent need for places of worship. National-level funding of religious venues has thus been halted altogether since 1983.

Efforts by municipal authorities have generally been more vigorous than those of the national government. This is due not only to their responsibilities for spatial planning, building regulations and public order, but also to their duty to implement and subsidize the so-called primary welfare work for immigrants, a task assigned them in 1985. They now have the policy instruments to exert some influence on the establishment of religious venues. Rotterdam was the first Dutch council to develop a genuine mosque policy, which also applies, *mutatis mutandis*, to Hindus. It aims for a limited number of large mosques, if possible outside immediate residential areas, and a disentanglement of religious and sociocultural functions. Factors that prompted this policy were the large-scale urban renewal projects and the complex social problems in the districts of minority concentration. Although the local authority has no power to keep people from opening places of worship, it does try to influence their location through zoning regulations. It has also provided financial backing to the above-mentioned SPIOR, to which most local mosque associations belong.

In most other local authorities, policy is much less coordinated, and many decisions are taken ad hoc. A case in point were the problems with the establishment of a Turkish mosque in the Amsterdam urban district De Baarsjes. A Muslim association had bought a former garage to convert into a large Islamic centre, but the district executive refused a renovation permit on the grounds that part of the land was zoned for housing.

Local authorities have also encouraged the construction of new mosques by altering zoning plans and providing grants. Zaandam and Eindhoven are amongst the places where large new mosques have been built following close cooperation between local authorities and Islamic groups.

## ***Education***

### *Islamic and Hindu religious instruction*

Parents of pupils attending state-run schools have the official right to demand religious instruction for their children. At present many Christian clergy as well as humanists teach religion and humanism several hours a week in state schools. The national authorities have reminded schools on several occasions that the right to religious instruction equally applies to 'religions of ethnic minority groups'. If parents request it, the local authority is required to arrange it as a standard part of the curriculum. It is not responsible, however, for the content of the instruction, nor for the choice of methods, teachers and materials. Those responsibilities rest with the organizations that provide the instruction. Nor are local authorities required to subsidize religious education. Should they decide to do so, they are allowed to make additional demands. One such demand made by some authorities is that the classes be taught in Dutch, and that is the reason why Islamic instruction has not got off the ground in Amsterdam, Deventer and Leyden, and why instruction given in Turkish was discontinued in Ede in 1994. In Utrecht the authorities tried to block Islamic instruction by a different route. In 1990 the education alderman turned down a request by a Protestant organization that wanted to give an impulse to religious education in state schools. The district managers of the local education department had advised against acceptance, because 'the chances are great that Muslim parents will then claim their right to religious instruction'.<sup>36</sup> Arguments against this referred to educational approach, the relationship between men and women, and educational deficiencies that 'foreign pupils' were already seen to have.

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<sup>36</sup> Letter of 11-7-1990 from the district managers' Central Education Committee representative to education alderman Van Lidth de Jeude, City of Utrecht.

Utrecht is no exception. Many other municipal authorities attach little importance to religious education in general and to Islamic instruction in particular. The latter is partly to blame on the poor reputation that Koran instruction in mosques acquired in the late 1970s. In the 1993/94 school year, there were only four municipalities in the whole country that were providing for Islamic religious instruction in state-run schools. One of them was Rotterdam, which also subsidizes it.

### *Islamic and Hindu schools*

Privately run schools in the Netherlands are entitled to the same financial treatment as state-run schools. This means that religiously based schools are fully funded by the state. At present there are 29 Islamic and 3 Hindu primary schools. Approximately 4 % of children from Muslim backgrounds attend Islamic schools – 4,360 pupils in 1993/94.

When Islamic or Hindu schools are set up it usually touches off debate. While proponents point to freedom of education and the equality principle, many objections are brought forward: fear of ‘segregation’ and ‘ghetto formation’, adverse effects on ‘integration’, and infiltration by ‘fundamentalist’ or ‘non-democratic’ groups. In 1989 the secretary of state for education Ginjaar-Maas responded to this debate with a special policy memorandum on Islamic and Hindu schools. She wrote that although the ‘potential segregational aspects’ caused her ‘some concern’, such schools were within the law and there seemed no reason to revise existing regulations.<sup>37</sup>

To be eligible for funding, schools must satisfy a whole series of conditions pertaining to curriculum, teacher qualifications, viability and pupil enrolment. Another key consideration in assessing applications is whether the school has a distinct religious or ideological character. The education ministry has recognized twelve such character categories, among them Islam and Hinduism. No differences are recognized within categories.

Assessment of applications for Islamic and Hindu schools often presents problems. The establishment of a second Hindu school in The Hague was initially refused because the ministry ruled there was not enough difference between it and the existing school. The new school appealed to the Council of State. It ruled in favour of the ministry, but indicated that recognition of the new Hindu tendency was conceivable in the future. Recognition was indeed

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<sup>37</sup> *Stichting van Basisscholen op Hindoeïstische of Islamitische Grondslag*, Lower House of Parliament, 1988/89 Session, 21110, no 1.

forthcoming, and the ministry went on to approve the school's application in late 1994.

The Education Council recently proposed that the concept of school character be completely disregarded in assessing future applications for new schools. This was seen to do more justice to the increasing ideological variation in the Netherlands.<sup>38</sup>

## 4.7 Conclusions

The relationship between state and religion in the five countries we are studying may be summarized in three fundamental principles: freedom of religion, equal treatment of religious groups, and separation of church and state. The first principle seems generally assured in all five countries. However, marked differences between countries have come to light as regards equal treatment. The practice of formal recognition of religions in Belgium and the public law registration of them in Germany imply *de facto* inequality for faiths that do not enjoy such a status. In a sense the greatest religious inequality exists in England, as a consequence of the historically privileged and dominant position of the Church of England. France and the Netherlands are the countries where equality is best guaranteed, although the equality principle has different implications in each of them. In France it means the state has no ties with any faith. In the Netherlands it was interpreted until 1983 to mean equal *fundamental conditions* for every faith. Since the constitutional revisions in that year, the interpretation has been more like that in France. There is one major difference. The pillarized Dutch traditions add a very specific dimension to the equality principle – one with consequential policy implications, such as full financial equivalence between privately run and state-run schools.

In matters pertaining to the separation of church and state, France and the Netherlands have been basically similar since 1983. The state has no

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<sup>38</sup> The advice of the Education Council was to leave the ideological character of a school entirely to its governing body. The twelve character categories now recognized are Free School, Hindu, Islamic, Jewish, Moravian, General Private, Protestant, Reformed, Reformed (Liberated), Roman Catholic, State, and Other Private. The last category is intended for non-recognized religious and ideological tendencies. One requirement for schools desiring public funding is that they should belong to a recognized category. In effect this means that the state assesses the ideological or religious principles of the school. The Education Council's proposal is basically to do away with this list and merely apply the categories State and Private.

official financial or other involvement with religions. Although in Germany and Belgium the separation principle applies too, the official recognition granted to certain religious groups implies some measure of material and immaterial state involvement with religions. In England, the existence of a privileged state church – and in particular the influence the Church of England has in the House of Lords – amounts to a real entanglement of church and state.

### ***Political participation***

Political participation implies here that religious people or religious communities can exert influence on policy as it relates to religion. In France and England, large percentages of Muslims and Hindus are citizens and can therefore vote and stand for election. In Belgium and Germany few immigrants with Muslim backgrounds have such rights, while in the Netherlands their numbers are increasing rapidly through naturalization. Hindus in the Netherlands are predominantly of Dutch nationality. The Netherlands has also extended municipal electoral rights to permanent residents who are foreign nationals. Experience in England shows that electoral rights can make a big difference at local levels. Cooperation between Muslim local councillors and the Bradford Council for Mosques, for example, has given Muslims considerable influence in local politics.

A different pattern can be seen in public participation and advisory processes. All five countries have participatory bodies at municipal or national levels. These were created in the context of policies targeting immigrants, but in Germany, England and the Netherlands it is the Muslims among them that have gained the most influence. In the Netherlands, Islamic organizations are explicitly represented in the national advisory and consultative structure. We should hasten to add that the councils in question admit only people to whom immigrant policy applies, thus excluding Muslims from countries like Pakistan and Palestine. Some local authorities in England and the Netherlands also have advisory councils. In all five countries we encounter Islamic (and in some cases Hindu) umbrella organizations, which may or may not be representatively chosen. Though these have no official status, they do take part in discussions. The difference between them and the advisory councils is that the umbrella organizations are based solely on the criterion of religious background. This enables Pakistani groups to be represented in Rotterdam's SPIOR.

### *Places of worship*

The creation of places to worship has been the first, and is still the foremost, form of institutionalization of Hinduism and Islam in the five countries. From a very early stage, people of both faiths have worked hard to realize places of worship, often aided by churches or other institutions and by advocates. Success in establishing such venues also depends on how organizational structures develop. Most places of worship are part of such structures and belong to specific religious currents.

Belgium has 210 mosques, France has 625 and Germany 900. England has 500 mosques and 303 mandirs; the Netherlands has about 380 mosques and (according to a tentative estimate based on data from three cities) 35 mandirs. The average number of Muslims per mosque is 1,400 in Germany and the Netherlands, 1,770 in Belgium, 1,900 in England, and 3,000 in France. The striking disparity between France and other countries, though partly attributable to the degree of organization among Muslims and possibly to the percentages of practising Muslims, certainly also reflects the differential opportunities Muslims have in the countries for establishing religious venues.

The founding of mosques and mandirs comes under the jurisdiction of municipal authorities in all five countries, and these differ widely in their responses to such initiatives. Although they cannot prevent the establishment of places of worship on principle, they can use other arguments to refuse or delay applications. Usually these pertain to demographic conditions or interethnic relationships in the area. The opening of mosques or mandirs has often been known to spark tensions in the neighbourhood, leading to accusations that they cause nuisance, attract other such establishments and start new ethnic infrastructures. Other factors that impinge on religious venues are building and safety regulations and zoning schemes. As the statistics suggest, these have been used in France in particular to hinder the establishment of mosques.

General principles governing church-state relations have been shown to have little influence on the realization of Muslim and Hindu places of worship. Such ideals are largely subordinated to local housing and urban planning regulations. Ideological perceptions of the Islam religion and its adherents are implicit undertones. In the few instances where target group policies on mosques are in place, as in Rotterdam, their chief purpose is to improve the position of immigrants.

## *Education*

The divergences between the five countries showed up most clearly in the density of educational institutions. The Dutch lead the way in the recognition, establishment and funding of Islamic and Hindu schools. Some 29 Islamic and 3 Hindu primary schools were set up in the Netherlands within a relatively short period of time. For the rest only Belgium and Germany have one Islamic school each that is recognized and funded by the authorities. The situation is different, however, when it comes to the provision of Islamic religious instruction in state schools. Only a few local authorities in the Netherlands provide for it, while in Belgium it is available on a large scale. In Germany it is often given in the context of immigrant minority language instruction. In France and England it is non-existent in state-run schools.

By contrast with policy on places of worship, the disparities in the sphere of education do derive in part from general principles governing the relationship between state and religion. Differences in legislation and other regulations are also a factor. In the Netherlands, privately run education is equated with that provided by the state, so that Islamic and Hindu schools are fully funded in the same way that state ones are. In France and Germany, privately run schools are required to survive on their own for several years before receiving state aid, and in Belgium the founders have to arrange the accommodation themselves. The absence of government-funded Islamic and Hindu schools in England is due not so much to existing regulations, but to the uncooperative attitude of government.

## *Comparison*

We have observed wide differences between countries in how they develop and justify policy on 'new' religions. France leans the strongest towards formulating policy in general terms, without reference to specific categories or groups. In the Netherlands there are also clear tendencies in that direction, especially since the constitutional revisions of 1983.<sup>39</sup> The principle of recognition as applied in Germany and Belgium effectively means that only specified religions have access to the available facilities. In England, historical phenomena such as anti-blasphemy legislation and standard religious instruction – though formulated in general terms and hence theoretically applicable to all religions – effectively benefit Christianity only.

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<sup>39</sup> The recent recommendations of the Education Council on the ideological character of schools amount to both a generalization of policy and a specification of the principle that the state is not to intervene in religious or ideological matters.

At the same time we have seen that all countries have some target group policies from which Muslims and Hindus can benefit. They are policies aimed officially at immigrants to alleviate the disadvantaged position of some groups. Most policy and political decision-making that applies to Hinduism and Islam is motivated by the social situation of their adherents. In other words, the decisive factor is not the relationship of the state to religion, but the assumptions and priorities of immigrant policy. This is most evident in the Netherlands. Another factor that determines the opportunities of Muslims (and to a lesser degree Hindus) to exercise their faith is the way these ‘new’ religions are ideologically perceived in European societies.

Two principal conclusions can be drawn from our investigations. First, in all five countries Islamic and Hindu institutions are unequal to those of the established religions – Christianity and Judaism. The inequality stems from official regulations, policy implementation, and historical privilege. Second, the five countries differ considerably in the opportunities they give Muslims and Hindus to establish their institutions. The Netherlands offers the most favourable conditions in this respect, mainly as a result of the pragmatic approach taken there. Opportunities do not vary widely between the other four countries.

It is difficult to say whether policy in the five countries is converging. Such convergence certainly seems a long way off from the point of view of the complex relationship each state has to religion – which is bound up with historical privilege, constitutional provisions, and the specific character and foundations of the nation state. Beyond that, however, closer coordination of immigrant policy and clearer perceptions of Islam could well help to narrow the policy gaps between countries.

## **Important literature by country**

### *Belgium*

Bastenier 1988; Blaise & Coorebyter 1990; Broeck 1992; Commissie-Hirsch Ballin 1988; Dasetto 1990 and 1991; Dasetto & Bastenier 1985; Foblets 1991; Janssen 1993; KCM 1989 and 1993; Leman 1992; Leman & Renaerts 1996; Leman et al. 1992a and 1992b; Nielsen 1992; Oers 1992; Rath et al. 1996; Roovers & Esch 1987; Tamarant 1989; Tamarant & Omar 1990.

### *Germany*

Abdullah 1979 and 1981; Commissie-Hirsch Ballin 1988; Doomernik 1991, 1995a and 1995b; Dresler 1992; Karagül 1994; Muller 1988; Nielsen 1992; Roovers & Van Esch 1987; Stempel 1986 and 1988; Wagtendonk 1991; Zentrum für Türkeistudien 1995.

### *France*

Cesari 1995; Commissie-Hirsch Ballin 1988; Gurrey 1994; Kepel 1987; Leveau 1991; Nielsen 1992; Rachedi 1994; Roy 1994; Shadid & Koningsveld 1995; Wagtendonk 1991; Weill 1996.

### *England*

Commissie-Hirsch Ballin 1988; Cumper 1990; Dwyer & Meyer 1995 and 1996; Husbands 1994; Joly 1988; Kaye 1993; Le Lohé 1993; Lewis 1994; Modood 1993; Nielsen 1986, 1988, 1989, 1991 and 1992; Rath et al. 1996; Roovers & Esch 1987; Scantlebury 1995; Vertovec 1996; Wagtendonk 1991.

### *Netherlands*

Bloemberg & Nijhuis 1993; Commissie-Hirsch Ballin 1988; Doomernik 1991; Feirabend & Rath 1996; Hampsink 1992; Karagül 1994; Landman 1992; Ministerie van Binnenlandse Zaken 1983; Nielsen 1992; Onderwijsraad 1996; Rath & Meyer 1994; Rath et al. 1996; Roosblad 1992; Roovers & Van Esch 1987; Schwencke 1994; Shadid & Koningsveld 1989 and 1992; Sunier 1995 and 1996; Werkgroep-Waardenburg 1983; WRR 1989.



### CONCLUSIONS

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*Hans Vermeulen*

#### 5.1 Introduction

All six countries in this study – Belgium, Germany, France, Great Britain, the Netherlands and Sweden – have experienced large-scale immigration since the Second World War. It came to an apparent halt in the mid-1970s, when recruitment of Mediterranean workers was ended following the 1973 oil crisis. Scarcer employment opportunities and tighter immigration and residence rules made it harder to enter a country without the right papers. Immigration from former colonies was also curbed, a process initiated earlier by Great Britain.

Remigration was a common theme in policy debates at the time, except in Britain, where the vast majority of immigrants already held citizenship. There were proposals not just to assist those who wanted to leave, but to actively encourage them to do so. Such programmes had little effect. The only immigrants to go in sizable numbers were those from southern Europe, such as Spanish workers in the Netherlands or Greeks in Germany – and that was due as much to the improving economies of their countries of origin as to their bleak employment situation in northern Europe. Although immigrants from outside Europe also considered returning, few of them saw the chance to do so when their job prospects diminished. Immigration still continued through family reunification and family formation. Around 1980 it began to dawn on most national governments that immigrants were there to stay, with or without work.

That realization caused governments to step up efforts towards integration, which also meant ongoing restrictions on new immigration. The term *assimilation* was generally rejected. Although, as we have seen above, *integration* remained a vague notion subject to various interpretations in different countries, in all cases it included some measure of cultural diversity and mutual respect. Many countries took steps to facilitate naturalization, to strengthen the rights of resident aliens and to pass anti-discrimination legislation.

All countries experienced a sharp rise in unemployment in the 1980s, and immigrants were especially hard hit. This caused policy attention to shift by the end of the decade to 'harder' sectors – labour market and education. There was also an observable shift towards general policy measures, away from measures that targeted immigrants specifically. In part this was due to emerging right-wing extremism. Authorities feared accusations of preferential treatment for ethnic minorities.

Even when family reunification became a less prominent factor in the 1990s, that did not spell the end of immigration. A new influx of asylum seekers followed. For Germany, which absorbed many of them, 1992 was a peak year, after which all countries took measures to stem the flow. Although many people have realized that immigration is an enduring phenomenon, none of the countries studied has yet seen fit to call itself an immigration country.

Having highlighted these general resemblances between the countries, we shall now go on to examine their differences and similarities in more detail. We will begin with a second look at the Castles and Miller (1993) typology outlined in Chapter 1.

## 5.2 Models

Many publications in recent years have compared the immigration policies – and to a lesser extent the *immigrant* policies – of different European countries. Many such writings concentrate on policy objectives, notions about nationality, or perceptions of the nation. They usually result in a typology of policy models. As we have noted in Chapter 1, Castles and Miller's typology distinguishes three models : the model of differential exclusion, the republican or assimilationist model, and the multicultural or pluralistic model. In the group of countries we are studying, Germany is the clearest example of the first model, although it is important to note that the German resettlers – the so-called *Aussiedler* – are not defined as immigrants but as compatriots. They are not excluded in any way, they are welcomed. France best represents the second model, and Sweden the third model. The authors note, however, that the newer immigration nations outside Europe, such as Canada, Australia and (to some degree) the United States, better typify the multicultural model. It will be good to take a deeper look at these and other classifications to see how they are related.

Many publications have devoted attention to the two conceptions of nation that are central to the differential exclusion and assimilationist

models.<sup>40</sup> The first concept, which follows the *jus sanguinis* principle, is often described as the ethnic conception of the nation, while the second, based on *jus soli*, has been called the territorial, contractual or political concept of the nation. They have also been juxtaposed as *Kulturnation* and *Staatsnation*, and it is claimed that they have radically different consequences for immigrant policy – a view that has received a great deal of attention and support in recent years. One well-known expression of it was Brubaker's *Citizenship and Nationhood in France and Germany* (1992). It argued that every nation state has its own ideas about the essence of the nation, and that such deeply rooted ways of thinking govern policy and legislation on immigrants and their opportunities to take on the nationality of their new country. The German, ethnic concept of the nation is seen to have resulted for the most part in the exclusion of immigrants, and the French concept in their inclusion. This resembles the Castles viewpoint set out earlier.

One can nevertheless detect similarities between the two contrasted models.<sup>41</sup> The French model contains elements of exclusion. Both the German and the French models exclude non-naturalized immigrants from the electoral process. The French as well as the German authorities tried to stimulate remigration in the late 1970s, and some observers even allege that Germany's remigration policies were modelled on the French ones. Both countries effectively gave immigrants the choice between going home or integrating, as Faist (1994) has expressed it for the German case. Both countries long thought in terms of cultural homogeneity within their respective nation states, and they still seem to have trouble moderating this view. Bearing these similarities in mind now, we might articulate the distinction as follows. Whilst Germany excludes immigrants<sup>42</sup> unless they are *willing* to assimilate culturally, France absorbs immigrants unless they *fail* to assimilate (or unless assimilation seems unlikely). The difference is that the German authorities see naturalization as the crowning touch of assimilation and the French see it as the starting point. The French view expresses great confidence in the assimilating strength of French culture, which makes sense if we recall the dominant position French language and culture enjoyed in Europe from the 17th to the 19th centuries.

Castles neglects to go into such points of agreement between the German model of differential exclusion and the French republican model,

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<sup>40</sup> See also Chapter 1.

<sup>41</sup> In Chapter 1 we saw that if we start from a distinction between two types of liberalism, the French model can be contrasted to Castles and Miller's two other models.

<sup>42</sup> Remember that resettlers are not regarded as immigrants.

although he does point out that they have comparable *impacts* : Both foster socioeconomic exclusion and racism, and the German model furthermore results in political marginalization. In Castles's view, the multicultural model offers the best perspectives for rapid and conflict-free absorption of immigrants in receiving societies. What does this multicultural model stand for, and what should we understand by multiculturalism and multicultural policy ?

### 5.3 The concept of multiculturalism

The idea of multiculturalism was first launched in Canada, where Trudeau used it as a central concept in his 1971 government programme. It was in response to the Quebec question. The term soon made its entry into the Australian and United States discussions, and Sweden officially introduced it in 1975. Facets of a multiculturalist viewpoint, including the term *multicultural society*, received rather extensive attention in Dutch policy documents from 1980 onwards. The term multiculturalism also came into more common usage in all those other European countries that had experienced immigration in the post-war period, and where it had become obvious that the immigrants were not just passing through. Like other terms, multiculturalism is not used everywhere in the same contexts or by the same people. In Germany, for example, it is encountered most in church circles and on the left side of the political spectrum.

Sometimes multiculturalism is used descriptively to mean the presence of cultural diversity within one state, although in this case one sooner speaks of a 'multicultural society'.<sup>43</sup> Usually that refers only to cultural diversity of the ethnic type.<sup>44</sup> Taken in this way, multiculturalism applies to virtually all countries (Cohen 1993). In most cases, however, the term is conceived in a normative sense, and as such it expresses a vision with an ideological tint, which urges at least the recognition and tolerance of cultural differences, and sometimes even the active stimulation of cultural diversity. Turner (1993) has created a useful distinction between *critical multiculturalism* and *difference*

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<sup>43</sup> If an abstract noun is preferred, one might choose the term *multiculturality* (Robertson 1992) above multiculturalism, reserving the latter for normative notions on how to shape a multicultural society, on how government and society should deal with multiculturality. This is the way we are using it here.

<sup>44</sup> We use the notion of *ethnicity* here in a broad sense to include groups that came into existence by immigration as well as 'indigenous peoples' and native ethnic-regional minorities. Multiculturality of the ethnic type may also be called 'polyethnicity'.

*multiculturalism*. The first refers to the use of cultural diversity as a basis to criticize existing cultural notions of majority and minorities, with the aim of building a more open, democratic culture. The second term is reserved for the use of multiculturalism by cultural nationalists and ‘fetishists of difference’, who enlist culture to legitimize ‘political and intellectual separatism’.

The notion of multiculturalism is used primarily in relation to cultural diversity arising from recent immigration. Sometimes it also includes groups who came from elsewhere in times long past, such as US blacks, or ethnic-regional minorities or so-called indigenous peoples. Even the cultures of other ‘minority groups’ or ‘subaltern groups’, such as women, gays or people with disabilities, may be included; this happens especially in the United States.

Is the idea of multiculturalism as new as the word implies? Is it not the same thing as pluralism, and wasn't pluralism characteristic of preindustrial empires like those of the Habsburgs and the Ottomans, as well as colonial societies? Multiculturalism differs from the ideologies of those societies in its implicit resistance to socioeconomic inequity between ethnic-cultural groups. For this reason some observers have distinguished between pluralism and multiculturalism (Rex 1991) or between the imperial model of ethnic relations (see the next section) and the multicultural model.

## 5.4 The multicultural model

Castles argues that the multicultural model offers the best guide to a political solution to problems inherent in the relationship between immigration, citizenship and democracy. In his view the multicultural model embraces the following principles.

1. A first priority is to make immigrants into citizens, by enabling them to acquire the nationality of their new country without too many delays or snags. In Australia, immigrants can be naturalized as early as two years after arrival.
2. The formal granting of citizenship does not yet mean *substantive* citizenship, that is, actual equality. It is partly a task of government to put an end to inequality between ethnic-cultural groups and to stamp out forces like racism that cause or perpetuate it.
3. Immigrants cannot become equal citizens unless state and society are prepared to accept that both individuals and groups have the right to cultural difference. Differential treatment and collective cultural rights for

groups with distinctive traits and needs are therefore core elements of multiculturalism. The present conjunction of substantive inequality and cultural difference calls for democratic participation by ethnic minorities.

4. The prevailing rules in a society have been laid down by the dominant group; they may well date from before the arrival of the immigrants. They are not neutral or above culture, they are culture-specific. Adaptation of such rules to accommodate newcomers is therefore required.

These four points make it plain that the multicultural model involves more than just culture. Its essence, one might even argue, lies in its simultaneous concern for political integration (1), social and economic emancipation (2) and recognition of other cultures as equal in principle (3 and 4). These are what distinguishes multiculturalism from the imperial model – where the preservation of cultural difference went hand in hand with social *inequality* and *differential* civil rights. This is the reason why anti-discrimination legislation and positive action tend to be regarded as aspects of multiculturalism.<sup>45</sup> It is an important reason to label British policy as multiculturalist (Mitchell & Russell 1996).

The third point above is undoubtedly the one that most clearly sets the multicultural model apart from Castles's other two models. The debate in political philosophy on multiculturalism also centres around the issue of group rights and special rights (Galenkamp 1993; Kymlicka 1995). It can also be inferred from the third point that multicultural policy is closely related to policies targeting specific groups. However, the two types of policy do not coincide completely. In the event of frictions between dominant culture and minority culture, two solutions are theoretically possible: adaptation of dominant culture to the new range of cultural variation in society (4th point) – the same thing that is often necessary after ‘internal’ cultural change – or the granting of special rights (3rd point). A combination of the two is also conceivable.

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<sup>45</sup> In this view the essence of multicultural policy is that it combines measures against socioeconomic inequity on ethnic lines with the acceptance of the principle of differential treatment of people with different characteristics, needs and desires (Castles 1995 : 17). However, positive action is not included in all notions of multicultural policy, nor is it necessarily a multiculturalist principle.

## 5.5 The models and the five cases

In discussing Castles and Miller's typology of policy models, we have cited three case examples as representative of those models – those of Germany, France and Sweden. How do our other three cases, Belgium, Great Britain and the Netherlands, relate to the typology? Moreover, are other typologies to be found in the literature?

The three types distinguished by Castles can be encountered in the works of other authors as well, and not just those who base themselves on Castles. Rex (1991) uses the same classification, and cites the same three countries as the most representative cases. A very different scheme is presented in one Council of Europe report.<sup>46</sup> It singles out France, Germany and Switzerland as the countries that think the most in terms of citizenship, with the Netherlands and Sweden (and to some extent Norway and Denmark) as countries that embrace 'cultural pluralism'. Great Britain is viewed as a case apart, characterized by policy based on 'racial distinctions' and 'race relations' (RvE 1991 : 24, 32). To some degree such variations in classification result from attention to different aspects of policy, but differing interpretations of the cases also play a part. We can see this in how Rex and Castles assign countries to the three types they both recognize.

While Castles puts the Netherlands and Great Britain in the same category as France and thereby labels them assimilationist, Rex assigns them both to the multicultural model along with Sweden. Castles does acknowledge that they exhibit some traits of the multicultural model (the Netherlands a bit more than Britain). When the Netherlands is put in the same category as Sweden, that is partly because they both show 'corporatist' traits (Soysal 1994). In the case of the Netherlands this mainly refers to its traditional religious organizational divisions, its target group policies and its consultative bodies. Britain tends to be labelled multiculturalist on different grounds, which vary from author to author. Rex emphasizes the existence of a multicultural discourse and an acceptance of cultural diversity in private life. Weil and Crowley (1994 : 123) observe that compared to France there is a remarkable tolerance in Britain for controversial minority demands in areas such as same-race adoption, separate schools, special family law, and black political caucuses. Mitchell and Russell (1996) believe that of the major immigration countries Britain comes closest to the multicultural model. In addition to points mentioned above, they especially highlight its anti-discrimination laws. They consider this legislation to be one of the firmest expressions of

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<sup>46</sup> For still other schemes, see also Smith & Blanc 1992 and Soysal 1994.

multiculturalism in Europe because of its acknowledgement of cultural and ethnic differences. Belgium is hardly ever mentioned in typologies of immigrant policy. Without giving reasons, Castles assigns it to the German model of differential exclusion.

After this brief look at how and why the various authors classify the countries in our study, we shall now summarize each country's policies on integration, language and religion. We will then reexamine their place in the typologies in the light of the above policy analyses.

### ***Belgium***

In the early 1980s the Belgian authorities explicitly acknowledged that the labour migrants would be settling in Belgium for good, and from that point on policy was developed to promote the integration of the immigrants and their children. In the first half of the decade it consisted of liberalized naturalization legislation and anti-discrimination measures. Since the late 1980s attention has shifted to socioeconomic deprivation among immigrants. A more cohesive immigrant policy has been developed whose chief aim is to improve immigrants' position in society, alongside naturalization and anti-discrimination measures. The priorities in fighting deprivation lie in the labour market, education and housing. Policy against deprivation is expressly formulated as one that strives to create equitable chances. Measures targeting immigrants are defended on the grounds that their disadvantage is to blame on specific, immigration-related causes.

In both the Flemish and Walloon regions, preference is given to general policy in the context of which immigrants are one of the specific target groups. This is why no legal framework for positive action on behalf of immigrants in the labour market has come about, although Flanders is considering one. In a sociocultural sense, integration means a general respect for cultural diversity and encouraging immigrants to accept the fundamental principles of Belgian society. On immigrant religions – primarily Islam – no coherent policy exists. The official recognition accorded to Islam, the widespread provision of Islamic instruction in state schools, and the unequivocal acknowledgement of the right to found Islamic schools are all indications of a commitment to equality. There are other signs, however, that the authorities want to influence Islam rather than supporting it, as illustrated by the lack of progress towards a representative body for Islam, the interventions of the Royal Commission on Migrant Policy into religious instruction, and the restrictive measures on places of worship. In Flanders, immigrant minority language instruction

(IMLI) is seen primarily as an aid to learning Dutch and as a measure against deprivation.

Belgian policy thus aims predominantly at the structural integration of immigrants in a political and a socioeconomic sense. In the cultural sphere policy is motivated by a 'neutral pluralism', under which immigrants' cultural identity – in particular their languages and religions – is simply recognized on principles of legal equality rather than supported and encouraged. Belgian policy is difficult to classify in the typology. In its emphasis on general policy, it perhaps most resembles France, and on the issue of recognition of Islam it is like Germany. One unique aspect has been the smooth integration of Islamic instruction into state schools, based on an existing educational tradition.

### *Germany*

It was not until the late 1980s that the German authorities acknowledged that labour migration had taken on a permanent character. The first step towards an integration policy was taken in 1991 with a relative easing of the tough naturalization regulations. Even so, requirements for becoming a German citizen still remain strict in comparison with the other countries studied. The legal status of most immigrants and their children born in Germany is effectively that of aliens. This results in inequality before the law, especially with respect to political rights.

German integration policy aims first and foremost at improving immigrants' position in education and the labour market. Immigrants are entitled to all provisions of general social policy. Some *Länder* also have target group policies to address educational deficiencies among immigrants. Because German *Länder* are autonomous to a large extent, there are wide variations in approach. This makes German policy difficult to categorize in general terms. At the national level, the distinctive cultural character of immigrant groups is largely ignored. This is not just because Germany clung to the idea of repatriation for so long, but also because a considerable amount of cultural adaptation is expected of those immigrants who decide to settle permanently in Germany.

The notion of a society with many cultures as a positive reality has been slow to meet with a response from German authorities. Islam has not yet gained official recognition, even though there are legal provisions that allow it. Little consultation takes place between Muslim organizations and the authorities, and the opportunities for Muslims in education are limited. More progress is apparent in IMLI. Though it still has a minor status and

subordinated educational objectives – its utility is measured primarily by whether it can correct educational deficiencies – this seems set to change in the near future.

German policy is focused heavily and one-sidedly on the socioeconomic integration of immigrants. They are to a large extent barred from political citizenship, and no explicit attention is devoted to their cultures. As the distinction between *Ausländer* and *Aussiedler* (foreigners and resettlers) plainly shows, the granting of full citizenship rights is firmly tied to a presumed German ancestry. For large numbers of *Aussiedler* – and in contrast to the *Ausländer* – Germany has pursued a rather successful integration policy in the past few decades.

The most characteristic feature of German policy is the fact that it defines the national community in ethnic terms, in terms of ancestry. Resettlers are not regarded as immigrants, but as Germans returning to the fatherland. Foreigners are still regarded as ‘alien elements’. But even despite all this, foreigners have been absorbed or integrated into the German welfare state to a considerable extent. More reluctance is evident in policy on language and religion, notwithstanding variations between *Länder*. Castles's characterization of Germany with the term *partial exclusion* seems justified, although it must be noted that the idea of Germany and France as opposite poles in immigrant policy is not borne out in their policies on language and religion.

### ***France***

In the early 1980s the French government gave up the idea of remigration as a serious possibility, and set course towards the integration of immigrants. The authorities introduced a large number of measures during that decade, but a clear framework was lacking. In 1993 the High Council on Integration formulated a more comprehensive view based on the goal of integration. The central pillar of French integration policy has traditionally been nationality legislation. Naturalization is encouraged, and it is subject to relatively few conditions. A second element is improving the legal position of immigrants and combating discrimination. A third is an active policy on deprivation, aimed at integration in employment, education and housing. It is worded in decidedly general terms. Policies targeting minorities are considered contrary to the principle of equality and are thought to foster segregation. In practice, however, immigrants *are* a specific target group of policy, particularly in job counselling and programmes to tackle language and educational deficiencies. Cultural policy on immigrants is governed by two

related principles, the notions of equality and political citizenship. In combination these principles imply that culture is a private matter and that groups of immigrants can claim no special cultural rights. Formal recognition of Islam with any accompanying benefits and rights is therefore not possible in France. The authorities also remain aloof from the building of mosques, and their main apparent involvement with Islam is to stimulate development of a 'French Islam'. They have been equally reluctant to encourage IMLI in primary education, although there has been some recognition of it in secondary schools. This policy, too, primarily serves integrationist aims.

French policy thus aims at absorbing immigrants as completely as possible into society – politically, socioeconomically and culturally. A high degree of adaptation to French culture is expected. Although the terms *insertion* and *intégration* may be intended to offer some space for immigrants' own cultures and identities, that space is small. It mainly consists of a measure of tolerance. One could hardly speak of recognition, let alone support. French policy remains strongly republican, and – despite official rejection of the term – it has clear assimilationist tendencies. Policy is particularly unresponsive when it comes to language and religion, and France has conspicuously low proportions of mosques and of children receiving IMLI. It is hard to say whether this is a consequence of policy, but that can certainly not be ruled out.

### ***Great Britain***

The British government was relatively early in responding to the presence of immigrants. They were mostly Commonwealth people, and as such they were British subjects. Since the mid-1960s a series of Race Relations Acts have been adopted, which are still constituent elements in British immigrant policy. The general goal of this policy is to create equal chances through tough anti-discrimination legislation. Indirect, structural discrimination (unintended discriminatory effects of prevailing rules or behaviour patterns) is also prohibited, and positive action is legally provided for. Interestingly, a good number of companies have introduced their own positive action policies on a voluntary basis. More important in practice are the behavioural codes designed to discourage discrimination in the labour market. One key measure that specifically targeted immigrants was Section 11 of the Local Government Act, which entitled local authorities to extra funding for posts relating to immigrants.

Labour governments in the 1970s attempted to improve the socioeconomic situation of immigrants, mainly through general policies. Since

the 1980s, however, general and target group policies against deprivation are virtually non-existent in Britain. Although authorities do talk positively of a multicultural society, neither the language policies nor those on religion can be called multicultural. The status of Islam and Hinduism is not equal to that of the Anglican church. Non-Christian religious instruction is not allowed in schools, and the founding of Islamic and Hindu schools is impeded in spite of the legal opportunities that exist. There is little room for IMLI in British education. It is only considered useful to improve instruction in English as a second language.

Policy in Great Britain may be characterized as the creation of equal political, legal, social and economic chances, in the absence of equal religious rights or active IMLI policy. While in some ways it may be justifiable to categorize the country in the multicultural model, this is certainly not the case when it comes to language, and even less so for religion. In these two areas the cultural policy of the British government exhibits clear assimilationist traits.

### *Netherlands*

The realization that labour migrants would not be returning home began to dawn in the Netherlands in the late 1970s. The 1979 report entitled *Ethnic Minorities* by the Advisory Council on Government Policy (WRR), which was followed by the 1983 *Minorities Memorandum*, signalled the start of immigrant policy. The aim was to bring about the integration of immigrants by alleviating deprivation, strengthening their legal status, fighting discrimination and stimulating political participation. Ample attention was also devoted to the shaping of a multicultural society. The 1983 government memorandum foresaw a key role for minority organizations themselves. In addition, religious facilities were considered essential to the functioning of minorities in Dutch society, and there were moves to alter statutory regulations. When minority unemployment soared in the second half of the 1980s, emphasis shifted to education and the labour market. New WRR recommendations were solicited, and in its 1989 report *Ethnic Minorities Policy* the council confirmed the importance of these two policy areas. Policy has since been directed more exclusively at these two areas, and there is increasing emphasis on general policies against deprivation. Nevertheless, policy still features many measures that target immigrants specifically, such as positive action policies pursued by some local authorities, the Fair Employment of Ethnic Minorities Act (WBEAA), and the newcomers' policy. Typical for the Netherlands are the

advisory and consultative bodies whose members serve on behalf of ethnic or religious organizations.

The cultural status of immigrants has consistently occupied an independent place in Dutch policy, albeit a minor one. In the early 1980s this was phrased as ‘integration with preservation of cultural identity’, and the notion of the multicultural society also came into common use. Such principles suggest an attitude that goes beyond mere tolerance of immigrant cultures. They reflect an aim of actively using policy to support and facilitate those cultures. Policy on religion and IMLI is more equivocal, however. In 1976 the authorities began stimulating Islam by subsidizing mosques, but they later halted the funding. And although the country has a relatively high number of state-subsidized Islamic and Hindu schools, instruction in these faiths within standard curricula runs into problems. IMLI policy reflects a growing awareness of the intrinsic aims of this type of language instruction, but in practice this often loses out to integrationist policies – which it is presumed to be incompatible with.

We thus see that structural integration of immigrants is a central objective in the Netherlands too. With respect to the immigrants' cultural status, authorities are rather ambivalent. They use the term multiculturalism in a positive normative sense, but their policies on language and religion are imbued with integrationist aims. Significant in this context is the recent introduction of the concept of citizenship, which emphasizes the importance of a common, shared culture.<sup>47</sup>

Dutch immigrant policy is noteworthy in many ways. The Netherlands was comparatively early in formulating a comprehensive policy, one which distinguished itself by targeting a number of groups that were defined on distinct ethnic criteria. The Netherlands has also created a unique system of consultative bodies composed of representatives of different ethnic and/or religious organizations. Apart from the Swedish case, which we were able to treat only partially, the Netherlands is without a doubt the most multiculturalist of the countries examined here. It combines this with distinct corporatist features. This form of multiculturalism is visible more than anywhere in religion, where it continues the ‘pillarized’ denominational traditions. IMLI policy does not diverge much from that in other countries. It lacks pluralism, although there is now a tendency to place more weight on the intrinsic value of IMLI.

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<sup>47</sup> In Dutch minorities policy, ‘citizenship’ also has strong individualist connotations.

This review makes clear that creating a typology is no simple task. One reason for this is that a given country's policies in the different areas pertaining to immigrants are by no means as cohesive as such a typology implies. It is definitely not the case that if we know a country's policy in area A, we can infer what policy it is pursuing in area B. One drawback of typologies à la Castles is that they presume far too much cohesion and uniformity within policy. Moreover, with their emphasis on different types of national traditions such schemes place too much and too exclusive emphasis on continuity. This can also be seen when the authors set out in search of the *causes* of differences.

## 5.6 In search of the roots of differences

Castles believes he sees clear similarities between the nation states that fall within each of his three models. He argues that the model of differential exclusion is characteristic of young states such as Germany that have been through the process of nation formation comparatively recently. A variant of this type is to be found in countries like Belgium and Switzerland that consist of a founding group of more than one nation. These three countries are also the traditional 'guest worker' countries. The assimilationist model is seen to be characteristic of former colonial powers still under the influence of a colonial racism, such as France, Britain and the Netherlands. Castles's multicultural model is typified by traditional immigration countries such as Canada, Australia and, to a lesser degree, the United States. Sweden is an exceptional case in his conception. He suggests that the Swedes modelled their immigrant policy on earlier policies used to integrate workers into society – a social-democratic politics featuring heavy state intervention.

One might wonder whether Castles has based his typology not on the policy differences themselves, but on national traits that he sees as the *sources* of policy differences. It is curious, for example, that he links the assimilationist model to colonialism, while others have posited a link between that same colonialism and multiculturalism or pluralism: 'The former colonial powers had already faced problems of multiculturalism earlier in their histories' (RvE 1991 : 15). According to the latter view, such historical factors can explain, at least in part, the multiculturalist tendencies in countries such as the Netherlands and Britain.

Brubaker is even more inclined to ground differences between nation states in a cultural-historical essence. He believes every state has its own

deeply rooted national consciousness, and that policy differences between German and French nationality legislation are traceable to different national consciousnesses. Lucassen (1993) correctly observes that Brubaker uses retrospective reasoning in his quest for an explanation, and that he is blind to moments in the past when developments could have just as easily taken a different course. Others have pointed out that French policy since the French Revolution has not always been based on the principle of *jus soli*. At some times, other principles, among them *jus sanguinis*, have weighed heavily. Following the German occupation of Alsace-Lorraine, for instance, France stressed the principle of free will – not the same as *jus soli*. Germany justified itself by pointing to the Germanic language and culture of the region. France could stake its claim only by arguing that the residents nevertheless *felt* French and wanted to be part of the French state.

The Swedish case well illustrates the dangers of culturalist explanations<sup>48</sup> that overemphasize historical continuity. Up to the beginning of the 1960s, Sweden had pursued a policy of assimilation towards ethnic minorities, which included the Sami (Lapps) and the Fins in the north of the country. A ban on speaking Finnish in public was not lifted until 1958. Runblom (1996) asks how a society that was so strongly assimilationist could suddenly make an about-face and start calling itself pluralist. He suggests several factors, the most important of which was the large-scale post-war immigration of Fins into Sweden. The Finnish government, in the interest of its own economy, wanted to prepare these Fins for a return to Finland and therefore pressed for rights for Finnish migrants to keep up their language. The Finnish immigrant community also made such a demand. This quickly led the Swedes to adopt a new policy line emphasizing the cultural rights of minorities.

As the Swedish example makes clear, the three models can only partially be considered to represent three distinctive types of national tradition. They might just as well be viewed as phases in a historical process. Assimilation as a policy towards ethnic minorities was typical of a period of state development when emphasis was on nation-building – a politics of cultural homogenization. Socioeconomic inequality along ethnic lines – also referred to as ethnic stratification or cultural division of labour – was considered much less of a problem at the time. From 1860 to 1960, for example, Sweden and the rest of Scandinavia pursued assimilationist policies. Assimilationism also

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<sup>48</sup> By culturalist explanations we mean those that emphasize continuity and unchangeability in culture. For a more extensive discussion see Vermeulen 1992.

characterized the policies of traditional immigration countries like Australia, Canada and the United States until the 1960s. In all these countries, criticism of assimilationism began to grow in the late 1960s. In the United States it came from Blacks and Jews, who, each for their own reasons, had little confidence in the promises of the assimilationist ideology. Anticolonial movements reinforced the criticism. It was the beginning of what Young (1993) would later call 'the rising tide of cultural pluralism'. The word *assimilation* came to be avoided almost everywhere, especially as a policy term. *Integration* gradually became the catchword.

Numerous definitions have been given for integration as a political aim of immigrant policy, and practically all of them stress that integration is not to be confused with assimilation. Many definitions further caution that assimilation is not a precondition for integration. The term integration puts heavy emphasis on eliminating deprivation and inequality, and it also expresses some measure of respect for cultural difference. When the British Home Secretary Jenkins introduced the word as a policy term in 1966, he defined it 'not [as] a flattening process of assimilation, but as equal opportunity accompanied by cultural diversity in an atmosphere of mutual tolerance'.<sup>49</sup> We can thus regard the term integration as an expression of acceptance of a certain amount of cultural diversity, a certain amount of multiculturalism. In all the countries we have studied we have found aspects of policy that can be interpreted more or less as multiculturalist in this sense (RvE 1991 : 32). If assimilation is typical of the heyday of the nation state – a period that lasted until the 1960s – then since that time a conception of the state has developed that is less concerned with the achievement of cultural uniformity. Some degree of cultural agreement is generally considered necessary, but it is assumed that one can create and sustain a political entity in combination with cultural diversity.

Multiculturalism experienced its prime in the 1980s. Criticism has mounted sharply in recent years, partially due to social trends such as rising unemployment, the scaling down of the welfare state, and the influence of right-wing extremism on politics. Moves to scale back multicultural policies are sometimes defended by saying that measures targeting minorities play into

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<sup>49</sup> His statement is quoted by Cashmore (1994 : 148), who himself posits a close connection between integration and pluralism. He gives the following definition of integration : '... a condition in which different ethnic groups are able to maintain group boundaries and uniqueness, while participating equally in the essential processes of production, distribution and government.' Rex (1991) sees the 'Jenkins formula' as an initial articulation of the concept of a multicultural society.

the hands of extremists – giving people the idea that minorities are receiving preferential treatment. The same trend is evident in the Dutch ethnic minorities policies introduced in 1992, in which multiculturalist principles have been toned down. The new policies are viewed by some as a return to a moderate assimilationism.<sup>50</sup>

It would be mistaken to view the criticism of multiculturalism purely as conservatism or a bow to right-wing extremism. It is confined neither to conservatives nor to members of the majority culture.<sup>51</sup> In the United States, books such as Schlesinger's *The Disuniting of America* (1991), and more recently Lind's *The New American Nation* (1995) and Hollinger's *Postethnic America* (1995), have attracted notice. In Canada, multiculturalism has been attacked by the Caribbean Asian writer Neil Bissoondath (1994) in a book graphically entitled *Selling Illusions*. One of the objections raised to multiculturalism is that it views cultural differences as too absolute and too static, and that this encourages reification of culture and a cult of difference. Multiculturalism is seen to give rise to competition for status and power and even to conflict between ethnic groups. Because it usually allocates rights to some groups and not to others, it can also trigger 'us-too reactions'. The Swedish social scientists Ålund and Schierup (1991) have argued that a tolerant, culturally relativist multiculturalism can stray unnoticed into a 'new racism'. Even in the face of such criticism, few experts are to be found who would urge a return to old-style assimilation politics. McClellan and Richmond (1994), for instance, conclude their critical analysis of Canadian multiculturalism by affirming that a radically redefined multiculturalism could still be our best guide in the new world order.

## **5.7 Policy on language and religion**

Immigration has confronted governments of modern democratic states with many similar dilemmas. These lie not only in the labour market, but also in the issue of how to respond to 'new' religions and to the needs, wishes and demands of ethnic minority populations for education in their 'own' languages. Perhaps it would be more correct to say that the modern democratic

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<sup>50</sup> Along with an increase in critical analyses of multiculturalism in academic circles there has also been a renewed focus and reappraisal of the notion of assimilation. See for example Glazer 1993; Kazal 1995.

<sup>51</sup> See for example Ålund & Schierup 1991; Collinson 1993; McClellan & Richmond 1994; Verdery 1994.

legal order constrains the ways the authorities can respond. This is well illustrated by IMLI policy. In none of the countries is policy repressive in the sense that education or publishing in minority languages is prohibited. It is important to underline this, because such prohibitions are easy to find in recent European history. We have seen how the Swedes forbade their Finnish minority to speak its mother tongue in public, and ten years ago a similar ban was in force for the Turkish minority in Bulgaria. On the other hand, it is rare for education to be offered completely and exclusively in minority languages as was done in the Habsburg and Ottoman Empires. Everywhere, IMLI has acquired a place in schools – and everywhere, especially in primary schools, that place is in the margins of mainstream education.

With regard to religion, too, governments can only operate within certain bounds, one of which is defined by the basic principle and right of religious freedom. Governmental authorities may go to great lengths to deter people from establishing mosques, but no government can prohibit it. Integration of Islamic and Hindu institutions in the existing order and adaptations to these ‘new’ religions have to be achieved in practice, and we have seen such processes in action in all the countries studied. The presence of Muslim and Hindu communities has created a need for consultation between their representatives and the authorities at both local and national levels. The strength of barriers and resistance to the formalization of such consultations varies widely, as does the extent of institutionalization already achieved.

### ***General and target group policies***

France is the most striking country in this respect.<sup>52</sup> The authorities there try to avoid target group policies as much as they can. If they have to use them, they try not to institutionalize them. Nonetheless, forms of target group policy do exist in France, especially in areas such as second-language acquisition and preparation for vocational training. Target group policies play a more important role in other countries, although we have seen a shift in emphasis to general policies in recent years.

The impact of target group policies can be assessed in programmes such as those for ethnic minorities in second-language acquisition, training and job counselling. Positive action policies have been in place in some sectors in Britain and the Netherlands, and they are being seriously considered in the Flemish part of Belgium. More explicit forms of target group policy are those

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<sup>52</sup> See also Breebaart et al. 1996 : 174.

designed for ‘resettlers’ in Germany and the Dutch minorities policy aimed at several closely defined groups.

If we consider the two types of liberalism referred to in Chapter 1 and the distinction between general and target group policy, there is one key difference between language and religion. In her criticism of Taylor's appeal for a ‘politics of recognition’ (Walzer's second variant of liberalism), Gutmann (1995) has argued that it is inappropriate to suggest that we have to choose between the two forms of liberalism or policy. One type of liberalism may be more suitable for some policy areas, and the other type for other areas. Gutmann illustrates this briefly for education and religion, and the distinction is even clearer if we compare language and religion.

The rise of nation states was accompanied by the rise of standardized national languages. In most cases one language or dialect was recognized as the national language. There was no question of neutrality in the sense of recognizing as equal all language variants existing within state borders. Such an arrangement is hardly even conceivable. ‘New’ languages are always at a disadvantage vis à vis the established national one. Only if actively supported by the authorities do they have a place in education or public life, and even then it is but a marginal one. This implies target group policies.

Religion is different. The norm of religious freedom prescribes as an ideal that all persons must have the freedom to exercise their faith and live according to its principles. We have seen that in practice this does not rule out privileges for one particular religion – although that is rather at odds with the ideal of equality. When ‘new’ religions appear, liberal ideals require us to investigate whether existing legislation and policy put these religions at an intended or unintended disadvantage, and whether they are offered the same opportunities as religions already present. If policy and legislation are found to be insufficiently neutral, they should be changed. Target group policy is generally not needed, or at most as a temporary measure to correct the disadvantage.

Policy on minority languages and ‘new’ religions is not only part of cultural policy but of immigrant policy as well. That means that target group policy is often based on criteria other than those intrinsic to language and religion. Immigrant policy usually targets only selected groups of immigrants. If we derive criteria for language instruction from immigrant policy, they are likely to concentrate on the role IMLI can play in integration. As for religion, the issue of deprivation is most explicit at the local level, where immigrant policy especially influences policy on places of worship.

In discussing the multicultural model, we observed that it is closely tied to the debate about group rights, and we drew a link between multicultural policy and target group policies. But we also warned that the two kinds of policy cannot be equated. That multicultural policy is not necessarily target group policy can be seen in Swedish IMLI policy and in the Dutch policies on religious schools. Though these could be called textbook examples of multicultural policy in Europe, both of them tend towards general policy. They do not confine themselves to selected minority languages or religions, but apply as much as possible to *all* minority languages and religions in society. And this is because they are increasingly based on intrinsic arguments rather than on considerations of disadvantage.

### ***Convergence and parallel development***

We have already noted some similarities between countries, and we have pointed out that what differences do occur are confined to a rather narrow band of variation. But similarities do not yet mean convergence. To find out whether countries are converging we have to show that the similarities are *increasing*. We should not forget that many of the countries in question have faced comparable problems in the past, and that many of the solutions they chose at that time were also similar to those of their neighbours. Well-known examples are the curbs on immigrant labour after the 1973 oil crisis, the attempts to encourage remigration, and the increased emphasis on integration as authorities acknowledged that immigrants would be staying.

The notion of convergence – different lines approaching one point, diminishing differences – must be distinguished from the notion of *parallel development*. We speak of parallel development when countries pass through the same general stages of development. In parallel development, many similarities can be seen in the past, but not the same ones as today. Often it is not easy to distinguish convergence from parallel developments.

As we have argued above, in a number of areas there appears to be parallel development. Since the 1960s, countries have been putting less emphasis on cultural homogeneity, partly due to their increasingly heterogeneous populations. This trend has manifested itself in immigrant policy as a shift from assimilation to integration – to a policy of more tolerance and respect for cultural differences. In some ways the trend in a more multiculturalist direction was a sequel to that. Since the early 1990s, more critical attitudes have arisen towards multiculturalist ideas, especially when they express themselves in the form of target group policies.

In IMLI, too, we saw that policy and the justifications for it showed a parallel development. Initially, justification was found in the idea of remigration. Later IMLI was defended by pointing to its presumed beneficial effects in correcting educational deficiencies. More recently, linguistic and cultural arguments – Broeder and Extra also speak of intrinsic arguments – are receiving more attention, though they have not yet found much expression in policy.

Some convergence has also occurred along with such parallel trends, though it is not equally strong in all policy areas. *Immigration* policy, for instance, shows clearer signs of convergence than *immigrant* policy. There is strong pressure from other countries and European institutions to harmonize measures on new immigration. Some observers (e.g. Mitchell & Russell 1995) have even spoken of a European migration regime. The wide disparities between French and German immigration legislation have narrowed. In recent years there have been increasing appeals in Germany to enable children of immigrants to gain citizenship more easily. The *jus sanguinis* element is thus being relaxed and the *jus soli* principle is being considered, while in France the opposite is happening.

Even in immigrant policy there has been some convergence. The impact of European regulations is great. In all member states, EU rules will apply to large groups of ‘third-country nationals’, and Turkish workers and their families have been shielded from deportation under the association agreement with Turkey. However, in the specific areas of language and religion there is only limited evidence of convergence. The need to converge and the pressure of European institutions is not as strong here. Furthermore, language and religion are more tightly bound up with notions of national identity. As Broeder and Extra point out, European treaties and guidelines apply mainly to regional minority languages, and they have had little noticeable effect on policy pertaining to immigrant minority languages. At most they have created a token amount of attention for the issue. As for religion, some degree of convergence can be seen in the recognition of Muslims as negotiating partners and in institutionalized aspects of ‘new’ religions. There are still wide disparities with regard to religious instruction in state schools and opportunities for religiously based schools, and there is no evidence these will narrow in the foreseeable future. The situation is different again when it comes to local policies on places of worship. What meets the eye are the considerable variations between cities in each country as a result of decentralization, while variation between countries seems smaller. In effect this observation moderates the significance of national differences. Reduced influence of the

central authorities in a country may contribute in this way to the process of convergence, as local authorities become less inclined to toe the national line. Ideological differences are still a factor,<sup>53</sup> but they are determined more by local than by national agendas.

We also see convergence when people increasingly employ similar vocabularies, containing words such as ‘integration’ and ‘multicultural’. This is encouraged by international consultations and can be observed in international reports (e.g. RvE 1991). One might wonder, however, whether such convergence in the use of terms is not deceptive. Using the same words does not necessarily mean people agree in their ideas. It could even serve to create an *illusion* of agreement.

Convergence clearly does exist at the level of practical and local politics, where finding solutions to specific problems is the thing that matters. In such situations, ideological differences tend to play a less prominent role. Those ideological positions that serve the national self-image and that are laid down in statutes and regulations are slower to change. This is the case with French republicanism. The tenet that France is a republic ‘*une et indivisible*’ is found, for example, at the centre of a major policy document (Haut Conseil 1991 : 52). Yet many defenders of republicanism today are arguing for a new, non-assimilationist version that would allow for the coexistence of different groups and cultures. Thus, ideological differences do not always remain unchanged. We have also seen that the *jus soli* principle has lost ground in France in recent years.

Sometimes statutes and regulations that are less closely bound up with ideological positions – or whose ideological charge has weakened over time – are still in force and can partially explain differences between countries. A case in point is the Dutch legislation dating from the height of the pillarized era, which goes a long way towards explaining the comparatively large number of Islamic and Hindu schools in that country.

In all probability, differences in immigrant policy will continue to narrow in the future. This will be an effect not only of ongoing European integration and the attendant pressure to harmonize, but also of more general processes such as expanding communication.

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<sup>53</sup> Recall the radically different ways the Utrecht and Rotterdam councils have responded to the institutionalization of Islam (Rath et al. 1996).

## 5.8 Concluding remarks

A growing number of studies in recent years have compared the policies that national authorities pursue towards their resident immigrant populations. Such studies may be attributed in part to an increasing desire among governments to compare and coordinate national policies with those of other countries, especially within the EU. Perhaps this trend is a sign that differences in policy are narrowing and will continue to do so in the future. However, many such studies still focus heavily on the differences. They often go on to relate these to differing notions of citizenship and nationhood which they claim have characterized the respective nation states for a large part of their histories. Such an approach reinforces the belief that national differences stem from deeply rooted cultural and ideological notions that will be slow and difficult to change.

The present study, which is based partly on the literature in question, has also found marked differences between immigrant policies as they relate to integration, 'new' religions and immigrant languages. But in closing we would like to make a few qualifying remarks on such differences.

- Differences are not equally great in all policy areas. For instance, they seem to be greater with respect to religion than to language.
- Various policy areas tend to have their own logic and their own particular histories and institutional arrangements in each country. This means that within one and the same country, the policies in one area might be described as multicultural, while those in other areas would qualify as assimilationist. British policy, for example, has been called multicultural, partly on the grounds of its anti-discrimination measures. However, in two of our primary areas of interest, 'new' religions and immigrant languages, it would sooner qualify as assimilationist.
- Culturalist explanations – those putting heavy emphasis on historical continuity in cultures and political ideologies – tend to underestimate the importance of changing conditions and the influence they may have on policy and dominant ideology. Our example of the transition from assimilationism to multiculturalism in Swedish policy has shown how crucial such conditions can be.
- Broad parallels in trends can be observed in various countries. Since the 1960s all have abandoned assimilation as a policy objective and have made integration the term of preference. In the process,

emphasis has also shifted to respect for immigrants' cultural distinctiveness. Multicultural ideas have also gained currency, but they have been subject to growing criticism in recent years.

- There is clear evidence of convergence in policy on new immigration, due to a general desire to arrive at a common strategy in the European context. European institutions are playing a central role in this process. Convergence in policy on the immigrants already present is harder to detect. European pressure is weaker here, and especially the policies on language and religion are closely bound up with issues of national identity. Nonetheless we believe that some signs of convergence in immigrant policy are evident and that the integration policies in particular will continue to converge in the future.

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## **GLOSSARY OF ORIGINAL NON-ENGLISH INSTITUTIONAL TERMS TRANSLATED IN THE TEXT**

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### **A**

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Adult Elementary Vocational Education (Netherlands)  
*Primaire Beroepsgerichte Volwasseneneducatie*

Advisory Council on Government Policy (Netherlands)  
*Wetenschappelijke Raad voor het Regeringsbeleid (WRR)*

Advisory Group on Ethnic Minorities (Netherlands)  
*Adviesgroep Etnische Groepen*

alderman (Netherlands)  
*wethouder*

Aliens Commissioner (Germany)  
*Ausländerbeauftragte*

Alliance of Moroccans and Tunisians (Netherlands)  
*Samenwerkingsverband Marokkanen en Tunesiërs (SMT)*

### **B**

---

Berlin Islamic Federation (Germany)  
*Islamische Föderation Berlin*

### **C**

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Cedars in the Garden (Netherlands)  
*Ceders in de tuin*

Central Council of Muslims in Germany  
*Zentralrat der Muslime in Deutschland*

Centre for Equal Opportunity and against Racism (Belgium)  
*Centrum voor Gelijkheid van Kansen en voor Racismebestrijding*  
*Centre pour l'Égalité des Chances et la Lutte contre le Racisme*

Church Construction (Subsidies) Act (Netherlands)  
*Wet Premie Kerkenbouw*

Cities Policy (Netherlands)  
*grote-stedenbeleid*

Commission on Foreign Workers (France)  
*Commission nationale de la Main d'Oeuvre étrangère*

Committee for Immigrant Minority Pupils in Education (Netherlands)

*Commissie Allochtone Leerlingen*

comprehensive education/school (Sweden)

*grundskola*

Consultative Council of French Muslims (France)

*Conseil consultatif des musulmans de France*

Contours Memorandum (Netherlands)

*Contourennota*

A Coordinated Migrant Policy (Flanders)

*Een Gecoördineerd Migrantenbeleid*

Council of Migrants (Antwerp)

*Migrantenraad*

Council of State (France)

*Conseil d'Etat*

Council of State (Netherlands)

*Raad van State*

## D

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Department of Education (Flanders)

*Departement van Onderwijs*

Düsseldorf Programme on Alien Rights Reform (Germany)

*Düsseldorfer Programm zum Reform des Ausländerrecht*

Dutch Centre for Immigrants (Netherlands)

*Nederlands Centrum Buitenlanders (NCB)*

## E

---

Education and Arts Ministers' Conference (Germany)

*Kultusministerkonferenz (KMK)*

Education Council (Netherlands)

*Onderwijsraad*

Education in Immigrant Minority Languages (1995 memorandum, Netherlands)

*Onderwijs in allochtone levende talen*

Educational Department (Germany)

*Schulverwaltung*

Educational Priority Policy (Flanders and Netherlands)

*Onderwijsvoorrangsbeleid*

Equal Treatment Act (Netherlands)

*Algemene Wet Gelijke Behandeling*

Equal Treatment Commission (Netherlands)  
*Commissie Gelijke Behandeling*

Ethnic Minorities (1979 report, Netherlands)  
*Etnische minderheden*

Ethnic Minorities Working for the Government (Netherlands)  
*Etnische Minderheden bij de Overheid (EMO)*

Ethnic Minority Policy (1989 report, Netherlands)  
*Allochtonenbeleid*

European school (Germany)  
*Europaschule*

Executive (Belgium)  
*Executieve*  
*Exécutif*

Executive of Muslims in Belgium  
*Executieve van Moslims in België*  
*Exécutif des Musulmans de Belgique*

## F

---

A Fair Chance (Netherlands)  
*Een eerlijke kans*

Fair Employment of Ethnic Minorities Bill (Netherlands)  
*Wet Bevordering Evenredige Arbeidskansen Allochtonen (WBEAA)*

Federal Government Commissioner for the Integration of Foreign Workers and Their Dependants (Germany)  
*Beauftragte der Bundesregierung für die Integration der ausländischen Arbeitnehmer und ihrer Familieangehörigen*

Federal Government Commissioner for the Interests of Aliens (Germany)  
*Beauftragte der Bundesregierung für die Belange der Ausländer*

Flemish Centre for the Integration of Migrants (Flanders)  
*Vlaams Centrum voor de Integratie van Migranten (VCIM)*

Flemish Educational Council  
*Vlaamse Onderwijsraad (VLOR)*

Foreigners' Auxiliary Council (Germany)  
*Ausländerbeirat*

French Overseas Departments  
*Départements d'outre-mer (DOM)*

French Overseas Territories  
*Territoires d'outre-mer (TOM)*

## G

---

General Audit Office (Netherlands)

*Algemene Rekenkamer*

General Council for Muslims in Belgium

*Algemene Raad voor Moslims in België*

*Conseil général des Musulmans de Belgique*

General Grants to Places of Worship Scheme (Netherlands)

*Globale Regeling inzake Subsidiëring Gebedsruimten*

German Language Association for Foreign Workers (Germany)

*Sprachverband Deutsch für ausländische Arbeitnehmer*

Government Reply Memorandum (Netherlands)

*Regeringsreactie*

Guaranteed Youth Employment Scheme (Netherlands)

*Jeugdwerkgarantieplan (JWG)*

Guidance Structure for Migrant Employment (Flanders)

*Begeleidingscel Werkgelegenheid Migranten*

## H

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High Council for Muslims in Belgium

*Hoge Raad voor Moslims in België (HRMB)*

*Conseil Supérieur des Musulmans de Belgique (CSMB)*

High Council on Integration (France)

*Haut Conseil à l'Intégration*

Home Language Reform (Sweden)

*Hemspråksreform*

home language statistics (Sweden)

*hemspråkstatistik*

## I

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Immigrant Minority Language Instruction (IMLI)

*Onderwijs in Allochtone Levende Talen (OALT)* (Netherlands)

*Onderwijs in Eigen Taal en Cultuur (OETC)* (Flanders and formerly Netherlands)

Incentive Fund for Migrant Policy (Belgium)

*Impulsfonds voor het Migrantenbeleid*

*Fonds d'Impulsion à la Politique des Immigrés*

Institute for Migration and Ethnic Studies, University of Amsterdam

*Instituut voor Migratie- en Etnische Studies (IMES), Universiteit van Amsterdam*

Institute of Sociology of Law, University of Nijmegen  
*Instituut voor Rechtssociologie, Katholieke Universiteit Nijmegen*

Integration Policy for Newcomers (Netherlands)  
*Inburgeringsbeleid voor Nieuwkomers*

Interministerial Commission on Migrant Policy (Belgium)  
*Interministeriële Conferentie voor het Migrentenbeleid*  
*Conférence interministérielle à la Politique des Immigrés*

Islam Council of the Federal Republic of Germany  
*Islamrat der Bundesrepublik Deutschland*

Islamic and Cultural Centre (ICC) (Belgium)  
*Islamitisch en Cultureel Centrum van België*  
*Centre Culturel et Islamique de Belgique*

Islamic Council (Germany)  
*Islamisches Konzil*

Islamic Council of the Netherlands  
*Islamitische Raad Nederland (IRN)*

## J

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Joint Industrial Labour Council (Netherlands)  
*Stichting van de Arbeid*

## K

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King Baudouin Foundation (Belgium)  
*Koning Boudewijnstichting*  
*Fondation Roi Baudouin*

## L

---

Local Education Policy (1995 memorandum, Netherlands)  
*Lokaal Onderwijsbeleid*

## M

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management consultants for minorities (Netherlands)  
*Bedrijfs Adviseurs Minderheden (BAMers)*

Measures for Social and Vocational Integration of Foreign Youth (Germany)  
*Massnahmen zur sozialen und beruflichen Eingliederung ausländischer*  
*Jugendlicher (MSBE)*

Memorandum on Foreign Workers (Netherlands)  
*Nota buitenlandse werknemers*

Ministry of Education (France)  
*Ministère de l'Education Nationale*

Ministry of Education and Arts (German Länder)  
*Kultusministerium*

Ministry of Education, Culture, and Science (Netherlands)  
*Ministerie van Onderwijs, Cultuur en Wetenschappen*

Ministry of Health, Welfare and Sport (Netherlands)  
*Ministerie van Volksgezondheid, Welzijn en Sport (VWS)*

Ministry of Home Affairs (Netherlands)  
*Ministerie van Binnenlandse Zaken*

Ministry of Labour (Germany)  
*Arbeitsministerium*

Ministry of Social Affairs (Netherlands)  
*Ministerie van Sociale Zaken*

Ministry of Welfare, Public Health and Culture (formerly Netherlands)  
*Ministerie van Welzijn, Volksgezondheid en Cultuur*

Minorities Memorandum (Netherlands)  
*Minderhedennota*

Minorities Policy Coordination Department (Netherlands)  
*Directie Coördinatie Minderhedenbeleid*

Minorities Research Advisory Committee (Netherlands)  
*Adviescommissie Onderzoek Minderheden (ACOM)*

municipal executive (Netherlands)  
*College van Burgemeester en Wethouders (B&W)*

## N

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National Advisory Commission on Human Rights (France)  
*Commission nationale consultative des Droits de l'Homme*

National Advisory and Consultative Body on Minorities (Netherlands)  
*Landelijke Advies- en Overlegstructuur (LAO)*

National Anti-Racism Bureau (Netherlands)  
*Landelijk Bureau ter bestrijding van Rassendiscriminatie (LBR)*

National Centre for Distance Education (France)  
*Centre National d'Enseignement à Distance (CNED)*

National Council on Immigrant Populations (France)  
*Conseil national des Populations immigrées (CNPI)*

National Examination Committee (Netherlands)  
*Landelijke Examencommissie*

National Federation of French Muslims (France)  
*Fédération nationale des musulmans de France (FNMF)*

National Institute for Curriculum Development (Netherlands)  
*Instituut voor Leerplanontwikkeling (SLO)*  
*Stichting voor de Leerplanontwikkeling (formerly)*

National Institute for Educational Measurement (Netherlands)  
*Centraal Instituut voor Toetsontwikkeling (CITO)*

National Institute for Oriental Languages and Civilizations (France)  
*Institut National des Langues et Civilisations Orientales (INALCO)*

National Islamic Committee (Netherlands)  
*Islamitisch Landelijk Comité (ILC)*

National Representative Committee of Muslims in France  
*Coordination nationale des musulmans en France*

Nationality Commission (France)  
*Commission de la Nationalité*

neighbourhood language (Germany)  
*Begegnungssprache*

Netherlands Muslim Council  
*Nederlandse Moslim Raad (NMR)*

## O

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Office of International Migration (France)  
*Office des Migrations Internationales (OMI)*

Outlines for Aliens Legislation (Germany)  
*Eckwerte zur Ausländergesetzgebung*

Outlines for the Newcomers' Integration Bill (Netherlands)  
*Hoofdpijnennotitie Wet Inburgering Nieuwkomers*

## P

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pillarization (Netherlands)  
*verzuiling*

Platform of Islamic Organizations (Netherlands)  
*Platform Islamitische Organisaties*

Policy Letter on Migrant Policy (Flanders)  
*Beleidsbrief Migrantenbeleid*

Policy Memorandum on Migrants (Flanders)  
*Beleidsnota Migranten*

Population and Migration Division (France)  
*Direction de la Population et des Migrations (DPM)*

primary school (Netherlands)  
*basisschool*

Primary Education Act (Netherlands)  
*Wet op het Basisonderwijs (WBO)*

priority action zone (ZAP) (Belgium, France)  
*prioritaire actiezone*  
*zone d'action prioritaire*

privately run schools (Netherlands)  
*bijzonder onderwijs*  
*bijzondere scholen*

Provisional Council of Experts (Belgium)  
*Voorlopige Raad der Wijzen*  
*Conseil provisoire des Sages*

public law corporate body (Germany)  
*Körperschaft des Öffentlichen Rechts (KÖR)*

## Q

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Qualifications Decree WBO (Netherlands)  
*Bevoegdhedenbesluit WBO*

## R

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Regional Council (Belgium)  
*Regionale Raad*  
*Conseil Régional*

registered society (Germany)  
*eingetragener Verein (e.V.)*

religious community (Germany)  
*Religionsgemeinschaft*

religious society (Germany)  
*Religionsgesellschaft*

Remigration Stimulation Act (Germany)  
*Rückkehrförderungsgesetz*

Representative Council of French Jewish Institutions (France)  
*Conseil Représentatif des Institutions Juives de France (CRIF)*

Representative Council of French Muslims (France)  
*Conseil représentatif des musulmans de France (CRMF)*

Research Centre Religion and Society, University of Amsterdam  
*Onderzoeksgroep Godsdienst en Maatschappij, Universiteit van Amsterdam*

Research Group on Language and Minorities, Tilburg University  
*Werkverband Taal en Minderheden, Katholieke Universiteit Brabant*

resettlers (Germany)  
*Aussiedler*

Rijnmond Platform of Islamic Organizations (Netherlands)  
*Stichting Platform Islamitische Organisaties Rijnmond (SPIOR)*

Royal Commission on Migrant Policy (Belgium)  
*Koninklijk Commissariaat voor het Migrantenbeleid (KCM)*  
*Commissariat Royal à la Politique des Immigrés (CRPI)*

## S

---

Secondary Education Act (Netherlands)  
*Wet op het Voortgezet Onderwijs (WVO)*

Social Regeneration Policy (Netherlands)  
*sociale vernieuwing*

Social Welfare Fund for Immigrant Workers (France)  
*Fonds d'Action sociale pour les Travailleurs Immigrés (FAS)*

Staff Establishment Decree WBO (Netherlands)  
*Formatiebesluit WBO*

state secretary (Netherlands)  
*staatssecretaris*

State of Affairs and Further Development of the Integration of Foreign Workers  
and Their Families in the Federal Republic of Germany  
*Stand und Weiterentwicklung der Integration der ausländischen Arbeitnehmer  
und ihrer Familien in der Bundesrepublik Deutschland*

Study Council on Islam in France  
*Conseil de Réflexion sur l'Islam en France (CORIF)*

supplementary instruction (Germany)  
*Ergänzungsunterricht*

supplementary instruction in the mother tongue (Germany)  
*muttersprachlicher Ergänzungsunterricht*

## T

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Technical Committee (Belgium)  
*Technisch Comité*  
*Comité technique*

Temporary Scheme for Grants to Muslim Places of Worship (Netherlands)  
*Tijdelijke Regeling Subsidiëring Gebedsruimten voor Moslims*

Temporary Scientific Commission for Minorities Policy Netherlands  
*Tijdelijke Wetenschappelijke Commissie Minderhedenbeleid (TWCM)*

1000 Jobs Scheme for Moluccans (Netherlands)  
*1.000-banenplan Molukkers*

## U

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Union of Dutch Municipalities (Netherlands)  
*Vereniging van Nederlandse Gemeenten*

Union of French Islamic Organizations (France)  
*Union des Organisations Islamiques de France*

Union of Moroccan Muslim Organizations (Netherlands)  
*Unie van Marokkaanse Moslim Organisaties (UMMON)*

upper secondary education/school (Sweden)  
*gymnasieskola*

urban district (Netherlands)  
*stadsdeel*

## V

---

Vocational Guidance and Training Centre (Netherlands)  
*Centrum voor Beroepsoriëntatie en Beroepsoefening*

VWO-HAVO-MAVO-VBO (Organization of Teaching) Decree (Netherlands)  
*Inrichtingsbesluit vwo-havo-mavo-vbo*

## W

---

Waardenburg Working Party (Netherlands)  
*Werkgroep-Waardenburg*

Working Party on Legal Aid in Alien Affairs (Netherlands)  
*Werkgroep Rechtsbijstand in Vreemdelingenzaken*

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