

DISSERTATION

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The European Union's Role in the Cultural Integration of European Muslims and Combating Islamophobia

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List of Abbreviations

AIG	Armed Islamic Group
CEPS	Centre for European Policy Studies
CFR	Charter of Fundamental Rights of the European Union
CJEU	Court of Justice of the European Union
CoE	Council of Europe
EC	European Community
ECHR	European Convention on Human Rights
ECJ	European Court of Justice
ECSC	European Coal and Steel Community
ECtHR	European Court of Human Rights
EU	European Union
FRA	European Union Agency for Fundamental Rights
IOM	International Organisation for Migration
NGO	Non-Governmental Organisation
TEU	Treaty on European Union
TFEU	Treaty on the Functioning of the European Union
UDHR	Universal Declaration of Human Rights
UN	United Nations
UNESCO	United Nations Educational, Scientific and Cultural Organisation

Abstract

The European agenda on multiculturalism has undermined Muslim communities through cultural repulsion. Muslims have been labelled as primitive and dangerous people. They experience discrimination at university, workplace or in the public sphere on a daily basis. Hence, the problem of Muslim cultural integration and the manifestation of Islamophobia in Europe pose a threatening challenge to European stability. The stigmatisation of Muslims and their exclusion undermine the image of the EU as the protagonist of liberal values and mar its motto of 'unity in diversity'. So, it is prudent to assume that a great power such as the EU should step forward to tackle Islamophobia and support a multicultural way of living by promoting Muslim cultural integration into European societies. Keeping this in view, the proposed research aimed to analyse the EU's legal framework and the mechanism of its 'soft policy' towards the cultural integration of European Muslims and combating Islamophobia from an anthropological perspective.

By means of qualitative research methods, the descriptive analysis of the EU policy and its anthropological impact on the Muslim cultural integration and combating Islamophobia led to the following results: The EU's policy in this field is more likely to be assessed as insufficient and ineffective. Nevertheless, it tends to support the cultural hybridisation of European Muslims. Such a policy choice results in moderate Islamophobia and protecting Muslims only against certain forms of discrimination.

Keywords: Assimilation; European Union; Hybridisation; Interculturalism; Islamophobia; Multiculturalism.

Chapter I. Introduction

Despite the long presence of Muslims in Europe,¹ in scholarly approximations, the European agenda on multiculturalism has undermined their existence through cultural repulsion. Muslims have been labelled as primitive and dangerous ‘other’ who are foreigners and lack European values (Eid, 2014). The majority of non-Muslim citizens in the European Union (EU) have unfavourable opinions of Muslims (Pew Research Centre, 2019). That the European cultural heritage is in peril by the ‘invasion’ of numerous Muslim refugees and immigrants is a popular public idea in the Member States (Hafez, 2015). Hostility against Muslims and Islam turned into a political platform (Pickel & Öztürk, 2018). Far-right parties gained great popularity in different European countries, e.g. Front National in France, the Vlaams Belang in Belgium, the Party of Freedom in the Netherlands, Danish People's Party, the Sweden Democrats, True Finn Party, Alternative for Germany. They consider themselves protectors of the European liberal-Christian traditions and call upon Muslims to assimilate or leave (Müller, 2016). Such antagonism reflects anti-Islam bigotry and, in some extreme cases, results in the physical destruction of individuals. In 2018–2020, the attacks on Muslims in Florence, Paris, Krakow or Hanau proved that cultural differences could mean death for the victims. In most cases, people with Islamic identities are dissociated from other communities in European societies because their 'Muslimness'² has been constructed as a problem.

Interestingly, Europe is not culturally homogenous. Different patterns of cultural othering exist amongst its countries and regions. For illustration, self-acclaimed liberal-secular societies of Western Europe consider Eastern European societies less democratic and illiberal, which coined the ‘otherness of Eastern Europe’ (Hudabiunigg, 2004, p.369). Furthermore, Islamophobia has different aspects in the Eastern and Western flanks of Europe. Nevertheless, the boundaries amongst European societies have been diminished in terms of modern forms and manifestations of Islamophobia. Many hate Islam and fear Muslims on both sides of the former Iron Curtain (Hafez, 2018; Kalmar, 2018). So, Islamophobia became a dangerous phenomenon in entire Europe. Muslims experience discrimination at university, workplace or

¹ Europe is a broad concept, and its borders vary according to the cultural, geographical and political contexts. In the current research, it encompasses the territory within the European Union.

² Muslimness is a contested concept, which embodies the prejudice that all Muslims share the same Islamic values and a way of life.

in the public sphere on a daily basis (Bayrakli & Hafez, 2019). They are urged to align themselves with the European lifestyle and values at the expense of their cultural traditions.

The question of Muslim cultural and social integration and the manifestation of Islamophobia in Europe pose ‘a challenge to us all’ (Runnymede Trust, 2017, p.1). From the perspective of morality, not a single person may enjoy peace and freedom when their fellow men suffer from rejection and humiliation (Heinrichs, 2012). In the social and political context, prospects of a bright European future appear dim if Muslim cultural diversity is not embraced. However, when Muslims are not safe in Europe, initially, the internal security and stability of the EU come under threat. Stigmatization of Muslims and their exclusion undermine the image of the EU as a protagonist of liberal values and mar its motto of ‘unity in diversity’ (Von Burg, 2010). The anti-Muslim and anti-Islam hysteria in Europe has created a political vacuum that is meant to be filled by a supra-national actor in the region because European countries fail to ‘address the number of delicate issues raised by the Muslim presence in Europe’ (Dassetto, 2007, p. 4). So, it is prudent to assume that a great power such as the EU should step forward to tackle Islamophobia and support a multicultural way of living by embracing Muslim cultural differences into European societies.

In this context, a modern scholarly approximation of Muslim question³ is closely related to the debates on the cultural differences between European societies and the Muslim communities in Europe, as well as Islamophobia (Bleich, 2012; Sayyid, 2014; Stolz, 2005). However, the role of the EU in this regard remains questionable. Non-governmental organisations (NGOs) and other Muslim civil society actors urge the EU to take appropriate steps to support Muslims, tackle anti-Muslim discrimination and hatred (European Network Against Racism, 2018; 2019). However, it is not their competence to engage with the study of the EU's approach towards controversies in European societies about Muslims and Islam. Predominantly, this is a task of scholars. However, the scholarly reference to the Muslim question in the EU policy context is limited with overall assessments or brief policy analysis (Bunzl, 2005; Khan, 2020; Weller, 2006; Xenidis, 2018). Keeping this in view, the proposed research aims to carry out an analytical study of the EU's legal framework and the mechanism of its ‘soft policy’⁴ towards the cultural integration of European Muslims⁵ and combating Islamophobia. The study revolves

³ Sometimes described as ‘Muslim problem’ which implies to the social, political and cultural controversies about Muslims and Islam.

⁴ The ‘soft policy’ implies the policy measures that are not related to the adoption of the law. See p. 139 of the dissertation.

⁵ This is a contested term, which requires conceptualization. See p.10 of the dissertation.

around the following questions: (1) *How does the EU promote cultural integration of European Muslims* (2) *How does the EU address Islamophobia?*

The research questions indicate that this is descriptive research. However, it examines the EU's relevant policies in the analytical discourse trespassing cultural anthropology. The dissertation does not involve anthropological methods, but it suggests that what the EU does or does not to integrate European Muslims and combat Islamophobia influences the social and cultural organisation of Muslim life in the European societies. This becomes lucid through the range of hypotheses.

1.1. Introduction to the hypotheses

A hypothetical approximation of the EU's role in the cultural integration of European Muslims and combating Islamophobia may embrace a large spectrum of variations. Assumably, the EU does not have a credible policy to combat Islamophobia and support Muslim cultural inclusion, or the EU effectively combats Islamophobia and ensures that the Muslim minority's culture is included in the European cultural diversity. However, the research anticipates that the approach of the EU towards Muslim cultural integration and Islamophobia pursues the pattern of a particular policy model. It is not necessarily an official policy, but specific actions or inactions of the EU, considering certain laws and 'soft policy' mechanisms, may have political outcomes regarding European Muslims. Accordingly, to narrow down the scope of analysis, the research draws up three hypotheses based on the three main perspectives on cultural integration of immigrants into the host society: assimilation, hybridisation and multiculturalism.⁶

Briefly and very schematically speaking, assimilation implies the process of newcomers sharing the host society's culture, which consists of the gradual disappearance of their original culture and behavioural patterns. On the contrary, the core of multiculturalism is that everyone, despite their cultural differences, has equal benefits or responsibilities in society and, at the same time, they retain the right to stay loyal to their traditional cultural values (Algan et al., 2012). There is also the third perspective of cultural integration, which refers to the partial disappearance of the immigrants' original culture. They adopt some aspects of the dominant

⁶ This type of classification does not exist in cultural anthropology, but it reflects the modern political discourse on immigrants' integration at the EU and national levels.

culture to access the public good of the host society but continue with certain practices of the original culture (Stockhammer, 2012). Often this model has been called hybridisation as it reflects a fusion of different cultural elements into a single cultural identity. However, which form the cultural integration process may take could be manipulated by specific policies (Penninx & Mascarenas, 2016).

Considering the nexus between Muslim cultural integration and Islamophobia, it can be said that the analysis of how the EU addresses Islamophobia also depends on its preference for a particular cultural integration model.

Logically speaking, if the assimilation of European Muslims results in the disappearance of their traditional cultural identity, nothing would be left to trigger European Islamophobia. Therefore, the extermination of Muslim cultural differences is a strategy to combat Islamophobia in the model of assimilation at the expense of eliminating grounds for the manifestation of Islamophobia in the host European societies. This is a quasi-prevention mechanism as host societies remain Islamophobic, but the cases in which Islamophobia manifests decrease because the subject of discrimination and hatred is absent. Contrary to this, the combat against Islamophobia in the multicultural perspective requires complete protection of Muslim cultural freedom and raising awareness about Islam in the host societies, which is more likely to result finally in the elimination of Islamophobic feelings and their manifestation.

Lastly, tackling Islamophobia from the perspective of cultural hybridisation would mean partial elimination of Muslim cultural differences and partial protection of their cultural liberty. It would constitute a fusion of both, which transforms traditional Muslims into secular ones.⁷ In the end, the hybridisation of Muslims could moderate Islamophobia (the public sentiments and the actual manifestation of it). However, it is less likely to eradicate Islamophobic attitudes in the host society entirely. The table below elucidates such categorization:

Table 1. Categorization of the policy outputs

Policy choice of the EU	Policy output (I)	Policy output (II)
Assimilation	Muslim cultural identity vanishes	The cases of Islamophobia manifestation decrease
Hybridisation	Muslims become secular	Moderated Islamophobia
Multiculturalism	Muslims preserve their cultural identity	The Islamophobic attitudes in the host society vanish

⁷ The term secular Muslim is debatable, but in the current research, it describes the limitation of Islam to the religious belief of worshipping Allah, which precludes its impact on the social life of Muslims.

Thus, if the EU addresses the cultural integration of European Muslims following any of the three models described above, it would invariably contain a reference to combating Islamophobia. The last is, however, the complex concept. The research differentiates between the sentiments of Islamophobia, often described as anti-Muslim and anti-Islam sentiments, and its actual manifestation in a speech or behaviour. This aspect has, therefore, led to developing the following hypotheses:

H₁: The EU's approach to the cultural integration of European Muslims and combating Islamophobia may embody the perspective of assimilation.

H₂: The EU's approach to the cultural integration of European Muslims and combating Islamophobia may embody the perspective of hybridisation.

H₃: The EU's approach to the cultural integration of European Muslims and combating Islamophobia may embody the perspective of multiculturalism.

Interestingly, all three models have a commonality in trying to ensure the combat against Islamophobia. However, only multiculturalism constitutes a positive and democratic way to eradicate this challenge as it provides absolute protection for cultural rights and religious freedom of Muslim immigrants and minorities and raises the awareness of the host society about Muslim culture. Thus, the research critically evaluates the EU's policy approach towards European Muslims and Islamophobia from the perspective of multiculturalism as a preferable and fair way of living with culturally different groups.

It is a stark reality that Europe already has its Muslim population, and the demographic pattern is not reversible. Going beyond discriminatory claims about assimilation and 'Europe without Muslims', a rational and civilized way of protecting European Muslims is to combat anti-Muslim hatred and support their cultural freedom. Multiculturalism is not an option, but the mandatory way of 'living together as free, equal but also irreducibly diverse' individuals (Müller, 2017, p. 3). In line with it, the research anticipates that an analysis of the EU's role in the cultural integration of European Muslims and combating Islamophobia will prove the third hypothesis, assuming that the EU's cultural policy towards Muslims complies with the multicultural model of integration and combating Islamophobia. Such an expectation is also based on the EU's value system, which consists of respect for human dignity and human rights,

freedom, democracy, equality and the rule of law (Charter of Fundamental Rights of the European Union, 2016).

1.2. Research goals and values

It should be the goal of any academic research to produce new knowledge of great topical value. Modern scholarly works concerning the EU's policy to fight Islamophobia and support the cultural integration of European Muslims often lack comprehensive analysis. Therefore, current research engages with the critical study of this topic. The primary goal is to bring light to the EU's relevant policy actions or inactions and analyse in which model of Muslim cultural integration the EU's policy fits more. The research does not anticipate to establish that the EU's policy towards Muslims is assimilation, hybridisation or multiculturalism, but it aims to analyse which models of Muslim cultural integration the EU favours.

The next step is a critical study of a particular policy in terms of combating Islamophobia. However, this type of research cannot avoid interpretive evaluation about the effectiveness of those policy measures and how they may affect the living of ordinary Muslims in European societies. The analytical character of the research also provides for the reasonability to draw necessary recommendations.

In addition, the study of the EU's policy approach towards European Muslims and Islamophobia seeks to elucidate that the process of cultural integration and the state of Islamophobia both are not naturally operated phenomena. Their operation is controllable by those actors (in this case, the EU and its Member States) who have the political power to produce the desired outcome. Thus, the research findings will depict a political framing of the combat against Islamophobia and a projected scenario of Muslim cultural integration in the EU.

Initiating a new angle on Islamophobia and cultural integration studies about the EU's policy constitutes the primary value of this research. It suggests that the Muslim question in Europe has various contexts and advances the study of this subject from different perspectives. Such an approach counts not only for modern Muslim studies but also for European studies in which, so far, the EU's policy of Muslim cultural integration and combating Islamophobia has been underestimated. This dissertation builds a ground to reconsider the new direction in the EU policy discourse; it raises awareness about Islamophobia and advances the liberal-democratic

principle of European multiculturalism. Nevertheless, despite ambitious objectives, the research does have its limitations.

1.3. Research boundaries

The study of the EU's role in the cultural integration of European Muslims and combating Islamophobia addresses a wide range of topics in this context, such as theories of Islamophobia and cultural integration, legal and 'soft policy' aspects of the EU's approach towards European Muslims. Nevertheless, the research has its boundaries. It examines these questions within the EU, which comprises the territories of the Member States and not the geographical or cultural borders of continental Europe. Furthermore, it remains focused on the EU's policy approach and does not intervene with studying the Member States' national policies on Muslim cultural integration and combating Islamophobia. The research may cite particular examples of certain Member States, but internal policies of the European countries are kept outside the scope of the dissertation.

It is a common opinion that the EU Member States within the limits of their national policies have difficulties upholding Muslim cultural freedoms and ensure effective combat against Islamophobia. The acknowledgement is based on the 2017 Muslims-selected findings of the 'Second European Union Minorities and Discrimination Survey' carried out by the Fundamental Rights Agency (FRA). The survey pointed out that the Member States failed to address anti-Muslim discrimination and hatred on their territories (European Union Agency for Fundamental Rights, 2017). Though the aspects of insufficient national policies also require further study, the current research is structured solely around the EU's policy context in nexus with Islamophobia and Muslim cultural integration.

1.4. The structure of the dissertation

This is an interdisciplinary study of the EU's approach to the cultural integration of European Muslims and combating Islamophobia, drawing on cultural anthropology, law, and politics. The

aspect of interdisciplinarity transforms it into a complex study and endangers the comprehensiveness of the research. To avoid the risk of performing a perfunctory analysis, the study focuses on each domain separately. At first, the research explains its methodology and introduces the main variables together with their correlation. Afterwards, it suggests a literature review of existing scholarly works on Islamophobia and Muslim cultural integration. This helps to comprehend the forms and the origins of European Islamophobia as well as its cultural aspects. It identifies the gap in the modern literature regarding the comprehensive study of the EU towards the Muslim question in Europe. Considering that three different models of cultural integration constitute the backbone of the research, the study also offers an in-depth discussion on the theories of multiculturalism, assimilation and hybridisation. In broader terms, this part of the dissertation represents the first stage of the research, which deals with understanding the phenomena in question. Otherwise, it would be impossible to analyze EU's law and policy regarding the cultural integration of European Muslims and combating Islamophobia. If there were a lack of understanding of what constituted Islamophobia and which characteristics distinguish one integration model from another, the researcher would find it difficult to succeed in the analysis.

After the theoretical framework, the research moves to the second stage and studies the EU's policy approach towards European Muslims and the challenge of Islamophobia. It focuses on the EU's relevant legal framework and the 'soft policy' measures separately to comprehensively analyze each domain. Eventually, this leads to the research findings and necessary recommendations in conclusion.

Additionally, the volume of dissertation chapters is not even as some specific questions require more extensive discussions than others for the in-depth analysis.

Chapter II. Research methodology

The methodology is a set of systematic techniques which guides the process of research. It explains the research variables, initiates a method of studying their correlation and clarifies conceptual ambiguity (Howell, 2013). In the proposed dissertation, the methodology introduces the main variables of the EU policy, Islamophobia and Muslim cultural integration, their conceptualisation and the measurement for correlation. It explains the nexus between Islamophobia and the cultural integration of European Muslims, how the EU's policy operates, and the peculiarities of the EU's legal and 'soft policy' competencies.

The methodology also elucidates the conceptual ambiguity regarding specific terms. It suggests an explanation about what under the concept of European Muslims is meant, what an understanding of culture and cultural values is to the purpose of this research, how different cultures may coexist and what constitutes the antagonism between Muslim and European values, whether arguably such things exist.

Apart from the conceptual issues, this chapter describes the methods of data collection and techniques of analysis. It indicates how selected research methods guarantee research reliability and validity.

These research techniques and conceptualisation patterns play a decisive role in gathering sufficient information for the EU policy description and in performing critical analysis while studying the EU's policy approach towards the cultural integration of European Muslims and combating Islamophobia.

2.1. Conceptualisation of the main terms

Terms such as European Muslims, Islamophobia, cultural integration and EU's cultural integration policy often appear in modern political or scholarly discourses, but the merits of these concepts are not always clear. In order to avoid any ambiguity in the research process, the dissertation suggests conceptualisations of the terms in question.

To begin with, it is the term European Muslim which requires greater clarity for one to understand the question of their cultural integration. Historically, the presence of Muslims in Europe implies their military invasions. For the first time, Islam entered Southern Europe due

to Umayyad invasions of the Iberian Peninsula in 711. The expansion of 'Moors' (Muslim Arabs and Berbers from North Africa) between the 8th and 10th centuries formed Muslim-ruling regions in modern Spain, Portugal, Sicily, and Malta. By the end of the 15th century, the Muslim conquest ended in the Mediterranean region with the fall of the last Muslim Emirate in Granada in 1492. The Muslim communities in these territories were either converted to Christianity or expelled (Sanders, 1965). Therefore, historical Muslim societies in Southern Europe do not exist, and the present time Muslim populations in those countries are the result of recent migrations.

Contrary to this, there are Muslim societies in South-eastern Europe due to Ottoman Muslim expansions into the Balkan region. These invasions occurred almost simultaneously with that of the Iberian Peninsula. In the 19th and 20th centuries, when Muslims were expelled from the majority of Eastern and Central Europe and when the Balkan states gained independence, the Muslim Bosnians, Albanians and Kosovars remained in their homelands, so arguably, they became the only 'historically settled' Muslim population of Europe (Khader, 2015). However, Bosnia, Albania and Kosovo are not yet members of the EU. This dissertation refers to the issue of Muslims who reside in the EU territory. In this sense, the spread of Islam in Central-Eastern Europe, especially the part under the EU, is related to the Tatars (different Mongol-Turkic ethnic groups) who migrated to Eastern Europe in the pre-Ottoman and post-Ottoman periods and remained there since (Lederer, 2007). Muslim Chechens joined them after the Russian aggression in Chechnya in the 1990s, seeking asylum mainly in Eastern Europe. However, they are migrating to the Member States in the western EU too.

Although cultural integration and combating Islamophobia are also issues facing Muslim Tatars and Chechens living in Central-Eastern Europe, the Muslim question in the EU is mainly understood to mean controversies about Muslim immigrants in Western Europe. This is because Western scholars give more weightage to Western Europe when referring to Europe as the continent, thus neglecting the problems of the Muslim population of Eastern Europe, both in its northern and southern tiers. Islamophobia in Eastern Europe is considered as Islamophobia without Muslims despite the presence of Tatar or Chechen Muslims there, and it emphasises the downward trend of the latest influx of Muslim immigrants and refugees into Eastern European countries (Kalmar, 2018; Pickel & Öztürk, 2018). Nevertheless, this dissertation avoids unnecessary narrowing down of the concept. It considers Eastern European Tatars and Chechens as European Muslims because modern Islamophobia, a problem of Muslim cultural

integration and the EU policy response, implies to every ordinary Muslim living in the EU territory.

However, a key role in the terming of European Muslims was played by those Muslim immigrants and their descendants who came to Europe from former colonies of European countries. After the end of the Second World War, the process of reconstruction started in Europe, and these countries began to tackle their labour shortage by sourcing labourers from their former colonies. However, not all Muslim immigrants came from ex-colonies. For example, Turkish and Kurdish labour immigrants arrived in Germany as Turkey was its ally in the First World War (Heckmann, 2015). In the 1950s, when immigrants from Muslim countries arrived in Europe to feed labour-hungry industries, the European host societies and even the newcomers themselves believed they would return home after a few years. Despite it, they stayed back, and their descendants now represent the bulk of the Muslim minorities in the EU. According to the International Organisation for Migration (IOM), minorities constitute a group of numerically weak people who possess cultural characteristics different from the rest of the population (IOM, 2011). Despite the migration background, they are third-country nationals who, in most cases, already hold the citizenship of the EU.

Apart from this, migration from Muslim countries to the EU increased in recent years. The 2015 refugee crisis was triggered by an influx of Muslims in large numbers, who fled death and devastating social conditions in their countries and sought asylum in the EU. This category of Muslim immigrants and refugees is different from the earlier wave of Muslim immigrants as they do not hold the citizenship of the EU. However, Muslim newcomers fuelled the new trend of anti-immigrant Islamophobia. Also, they stand in the centre of the cultural integration process. So, to the purpose of current research, despite the different background, years of residence and legal status, the term European Muslim is being stretched to these immigrants.

Some may argue that such a conceptual stretching makes it more complex to comprehend the Muslim question in Europe. In response to this, it may be said that Muslims' cultural freedom and discrimination in European societies are not measured by their legal status or years of residence. They all are addressed as immigrants and stigmatised because of their loyalty to Muslim culture and religion. The study of the Muslim question in Europe refers to their labelling as Europe's dangerous and primitive 'other', who are unwelcome and hated because of their cultural differences. As Werner Schiffauer argues, when a 'moral panic' outbreak in civil society, such as public hysteria about Muslims, people declare everyone considered Muslim to be the public enemy (Schiffauer, 2007, p.111). Individuals who have anti-Muslim

prejudices and hatred do not think about their nationality, social or legal status. For them, what matters is that Muslims have a different traditional way of life, which is unwelcome in European societies.

Thus, in this dissertation, European Muslims describes different categories of Muslims residing in the EU territory. They are immigrants and refugees who came to Europe at different times and with different statuses. Some were borne in Europe. Many of them hold the citizenship of the EU, but many do not. It is not the intention of such terming to uphold the prejudice that Muslims are culturally homogenous but to denote that every Muslim living in the European societies faces the same problem of cultural othering. However, broadening the term to include all Muslim individuals within the EU irrespective of their different ethnic, national, social and historical origins raises uncertainties about the concept of culture. Therefore, it requires methodological clarification as to how culture and cultural integration should be understood in the context of this dissertation.

2.1.1. Understanding ‘culture’ and ‘cultural integration’

In ancient times people migrated from one place to another and faced the problems of something that is called today cultural integration (Tartaron, 2014). Over time, anthropologists and sociologists started to develop theories around it. However, there has been no common understanding of what culture is and how cultural integration works (Lebron, 2013). These concepts pose as highly debated questions; therefore, in the context of current research, the consideration is solely about scientific assumptions on the topic relevant to the dissertation goals. Thus, considering that most people think about ‘the others’ in terms of ‘them’ sharing different cultures from ‘us’, the issue can be boiled down to the following questions: Shall we discuss culture rather as a normative or socio-psychological phenomenon? If the first, is the integration of ‘alien’ people into ‘different cultures’ possible? Do communities, convinced of being radically different, live together in a neighbourhood or a single state? Can the ethno-religiously defined minorities, especially immigrants, be integrated into the host and mainstream society without giving up their cultural traditions? Can people self-perceiving or being perceived as ‘culturally different’ cohabit and create a common hybrid culture?

To address the first question, a variety of theories attempt to define the concept of culture. According to Matthew Johnson, who sought to define culture and its activities, culture is a

contested concept. It may find different conceptualisations depending on the perspective it takes to comprehend the term. It can be understood as the inward operation of pursuing individual perfection or a symbolic system of values and intellectual conscience of society (Johnson, 2013). The author borrowed the definition of culture from the conceptualisation suggested by Edward Tylor to elucidate the complex description of this phenomenon. Tylor argued that it was a 'complex whole which includes knowledge, belief, art, morals, law, customs, and any other capabilities and habits acquired by a man as a member of society' (Tylor, 1871, p.1). Following this, culture may have a broad definition, which could be applied to all individual and group behaviour patterns. Significantly, cultures vary around common history, values, norms, codes of conduct and even conscience. As Clifford Geertz assumes, the main peculiarity of culture is that the beliefs, morals, customs, and habits of individuals or a group of people belonging to one culture distinguishes them from others (Geertz, 1973). To the purpose of the dissertation, culture is understood as a value system of beliefs, customs and traditions that define the way of life within a particular cultural group. Since European Muslims distinguish between one and another according to their ethnic and national cultural traditions, the culture of European Muslims, referred to as Muslim culture, stresses specific traditions and customs derived from the religion of Islam (Moaddel, 2002; Sinaga, 2016). As Islam is not considered a part of European cultural heritage and is related to the immigrant cultural groups, the Muslim question in Europe reveals the same peculiarities which in generic terms are characteristic of different cultural groups starting to live together within a single nation-state.

However, it is more sophisticated to understand the European culture, or it is instead a civilisation. This has always been a matter of conceptual confusion. As Adam Kuper described, they preferred the term civilisation in France, whereas in Germany, the term culture was acceptable (Kupper, 1999). Boundaries between culture and civilisation have been diminished in British scholarship. Edward Taylor used both terms interchangeably (Taylor, 1958). On the other hand, Samuel Huntington preferred to talk about civilisation in the European context and defined that 'civilisation is a cultural entity' (Huntington, 1993, p.23). Nevertheless, other authors questioned whether there is such thing as European culture or European civilisation and argued that 'there is no culture that is both general throughout Europe and unique to Europe' (Fernandez-Armesto, 2002, p.3). As a direct response to the statement of Filipe Fernandez-Armesto could be considered Huntington's point of view regarding European civilisation. He stated:

‘Villages, regions, ethnic groups, nationalities, religious groups, all have distinct cultures at different levels of cultural heterogeneity. The culture of a village in southern Italy may be different from that of a village in northern Italy, but both will share a common Italian culture that distinguishes them from German villages. European Communities, in turn, will share cultural features that distinguish them from Arab and Chinese communities’ (Huntington, 1993, p.23).

Despite scholarly confusions and descensions, this dissertation – following particular scholarly nomenclature – prefers to refer to it as European culture, which for many people comprises the values common to all European communities. Though it is also contested what European values are, considering the European dichotomy of East and West, it unifies historical Christian heritage and modern western European values of secular liberalism (Sutherland, 2010). However, the critical question is not what European cultural values are but that Islam is not considered a part of the imagined European cultural heritage. This leads to othering and stigmatising Muslim immigrants and coins the ‘problem’ of their ‘Muslimness’. Eventually, it raises the dilemma of Muslim cultural integration.

What cultural integration is and what it does are also cause of conceptual confusion. Some scholars approximate it as a state of social organisation where people from different backgrounds feel welcome in the cultural atmosphere they live in and develop a belief of receiving equal treatment despite cultural differences (Talmage & Knopf, 2017). Following this, integration appears as a constant phenomenon, a form of living together within a system-like 'whole', which consists of different cultural groups and has defined borders around its environment (Veenman, 2003). In the words of Adrian Favell, cultural integration is an ‘ideal end-goal for society as a whole’ (Favell, 2005, p.1). However, an approach to cultural integration as something constant does not comply with the methodology of this dissertation. A constant phenomenon cannot establish a correlation with other factors such as the EU's policy.

Another peculiarity around cultural integration implies a rejection of its understanding as cultural fusion. It has been acknowledged that when people from different cultural groups come to live together, they mutually accept certain cultural traditions. This may happen in the form of music, food, attitudes, religion and many other cultural characteristics (Hallowell, 1955; Anderson, 1960). It does not imply a synthesis of two or more cultures, which leads to the emergence of another culture. According to Margaret Archer, cultural integration myth is that two or more cultural systems may unify into one culture. Different cultures cannot merge

(Archer, 1985). Although it does not mean fusion or merger of cultures, an individual may share the elements of two or more cultures, which may give birth to a novel cultural identity. Such a phenomenon is known as cultural hybridisation (Bhabha, 1994). In line with this, David Sam and John Berry prefer to use the term acculturation, which describes a change in behaviour, beliefs, customs and traditions when an intercultural contact between the representatives of different cultural groups takes place (Sam & Berry, 2010). The problem with the concept of acculturation is that it points out how different cultural groups come together and accept certain cultural aspects and customs. This means cultural assimilation. So, as suggested by Homi Bhabha or Sam and Berry, conceptualisations do not define cultural integration as such but its particular models of hybridisation and assimilation. In this sense, it is significant to lay boundaries between the concept of cultural integration and its particular models.

Despite various theories and models of migrant integration, overall, it is an approach that defines integration as a 'process of becoming an accepted part of society' (Penninx & Mascarenas, 2016, p. 11). However, acceptance is not an easy proposition. According to Jacqueline Chan and David Hamilton, acceptance is 'the presence of an egalitarian atmosphere within an organisation, created by egalitarian beliefs and interactions among group members, perpetuated by group norms and practices, and felt by both majority and minority group members' (Chan & Hamilton, 2015, p.2). Thus, immigrant acceptance is a conditional phenomenon that rests upon the egalitarian atmosphere and interaction between the newcomer and the host society. However, achieving egalitarianism in the interaction becomes complicated when cultural perceptions and practices of immigrants and the host society are different. This time, the indicator of successful integration is whether immigrants will acquire an equal place in society despite the cultural differences (Penninx & Mascarenas, 2016). Another significant aspect of integration is the nature of the perspective that this process may take. If the determinant is an immigrant's aspiration to acquire a recognised place in the host society, then the process centres on the newcomer's ability to develop a sense of belonging to the host society despite existing cultural differences. On the contrary, the determinant of cultural integration may happen to be the readiness of the host society to embrace different cultures and enter into an egalitarian interaction with the newcomer. This study type has been broadly applied in the field of sociology. According to the Chicago School of urban sociology, cultural integration of newcomers into the host society could be approached from the perspective that focuses solely on the immigrants in terms of changes in their ideas and behaviours; or primarily the receiving society and its reactions to newcomers may come under consideration (Penninx & Mascarenas, 2016).

Nevertheless, the conceptual definition of cultural integration shared in this dissertation differs from the one defined in the theories. It applies to individuals, the process of their cultural othering and their belonging to particular societies. The concept of culture cannot exist without people. It is based on the reference to socialisation, which describes a process when an individual acquires the necessary behaviour and knowledge to assume a role in society (Maanen & Schein, 1979). According to this assumption, the cultural dimension of socialisation implies an acceptance and social inclusion of individuals irrespective of the different cultural groups. So, in the case of European Muslims, the term cultural integration could be understood as a process of acceptance and belonging, in which Muslims individually or in the group gradually acquire the feeling of becoming members of the host European societies. In this sense, the conditions of acceptance and belonging to European societies could be different. Muslims may assume their role in society following their entire or partial acculturation or become accepted members of the host society retaining all of their cultural differences. The form that the process takes defines the model of assimilation, hybridisation or multiculturalism. However, any pattern of Muslim cultural integration has a nexus with Islamophobia.

2.1.2. Conceptual definition of Islamophobia and its nexus with Muslim cultural integration

What constitutes Islamophobia is also a topic for many academic debates. This dissertation suggests a literature review on the origins and working definition of Islamophobia in a separate chapter. The methodology aims to briefly discuss the conceptualisation attempts made to understand this phenomenon and what its practical definition should be for the current research purposes.

In the realm of multiple theories, there is no universal or commonly acceptable definition of Islamophobia. As Salman Sayyid states, any attempts to define Islamophobia are only a reflection of how the term can be used (Sayyid, 2014). Nevertheless, scholars continue to strive to reach a common understanding of this phenomenon. The British think tank, Runnymede Trust, has provided a crucial definition of Islamophobia. Although Islamophobia as a term was not uncommon in the political debates in the 1990s, in an article: 'Islamophobia a challenge for us all' (Runnymede Trust, 1997), the Runnymede Trust offered a practical definition of the concept:

‘The term Islamophobia refers to unfounded hostility towards Islam. It refers also to the practical consequences of such hostility in unfair discrimination against Muslim individuals and communities, and to the exclusion of Muslims from mainstream political and social affairs’ (Runnymede Trust, 1997, p. 3).

The Runnymede commission admitted that the definition was not ideal, but it pandered to covering up of demonisation and stigmatisation of Muslims in the name of criticism of Islam (Runnymede Trust, 1997). Indeed, this represents a general definition of Islamophobia which is challenging to apply in practice. According to the Runnymede Trust, what factors constitute unfounded hostility and discrimination have not been defined, and it remains a matter of interpretation. However, if until this point the postulates such as ‘fear of Islam’, ‘anti-Muslim hatred’ and ‘primitive others’ were considered alone under the term of Islamophobia, the Runnymede definition brought into the conceptualisation the component of discrimination. At the same time, it establishes a nexus between Islamophobia and integration, in which exclusion of Muslims from political or social affairs, as opposed to integration, constitutes Islamophobia.

In the aftermath of Runnymede Trust, scholars argued whether Islamophobia was about Islam or Muslims or both. José Pedro Zúquete called it a 'blanket judgement of Islam as enemy' (Zúquete, 2008, p.323). In the opinion of Peter Gottschalk and Gabriel Greenberg, Islamophobia is 'social anxiety toward Islam and Muslim cultures' (Gottschalk & Greenberg, 2008, p.5). Jörg Stolz defined it as a prejudicial and stereotypical rejection of Islam and Muslims (Stolz, 2005). According to Erik Bleich, Islamophobia is 'indiscriminate negative attitudes or emotions directed at Islam or Muslims' (Bleich, 2012, p.181).

However, twenty years later, the Runnymede Trust published another article about Islamophobia under the title: ‘Islamophobia still a challenge to us all’. It emphasised that anti-Muslim sentiments in Europe did not perish, but they became more noticeable in various forms of expression. Therefore, the old definition suggested by 1997 Runnymede commission did not lose its relevance in the 21st century; and, additionally, the latest conceptualisation of the term Islamophobia extended to the forms and ways of anti-Muslim discrimination:

‘Islamophobia is any distinction, exclusion or restriction towards, or preference against, Muslims (or those perceived to be Muslims) that has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise, on an equal footing, of human rights and fundamental freedoms in the political, economic, social, cultural or any other field of public life’ (Runnymede Trust, 2017, p.7).

In this definition, the Runnymede Trust explicitly addressed Islamophobia as a violation of human rights against Muslims and added a cultural dimension to the fields of public life in which Muslims should stand on an equal footing with others. However, a particularity of the first and the second definitions of Islamophobia suggested by Runnymede Trust is that they have been built on the United Nation's (UN) general definition of racism and contains a reference to anti-Muslim racism (UN, 1963). The inclusion of racial elements in the definition of Islamophobia has triggered criticisms as religion does not constitute a racial phenomenon. Racism is the ideology about racial categories of people believed to be inferior to others. They are marked with specific physical differences linked to their cultural and social features. Hence, stretching this concept is irrelevant in terms of religious differences (Golash-Boza, 2015; Morning, 2011; Richardson, 2012). The opponents of connecting Islamophobia with racism are scholars who believe that Islamophobia is about Islam and discrimination of Muslims is a practical consequence (Abbas, 2004; Gilks, 2019). Talal Asad stated that the stereotypes about Muslims had a prejudicial fundament of Islam being a quasi-civilisation or quasi-culture that ran counter to a civilised way of life (Asad, 2003). According to Mehdi Semati, Islamophobia is more about Islam than Muslims. It is 'a single, unified and negative conception of an essentialised Islam, which is deemed incompatible with Euro-Americanness (Semati, 2010, p.1). In response to this, two decades earlier, scholars suggested that since the second half of the twentieth century, biological traits do not stand in the centre of racial discourse, and it is about cultural differences (Blaut, 1992; Jones, 1999).

In line with it, a group of authors, who do not subscribe to the definition suggested by the Runnymede Trust, argue that Islamophobia goes beyond racism. However, it contains the elements of anti-Muslim racism as it implies cultural prejudices and discrimination against individuals based on their religious beliefs. Scholars refer to the racialisation of Muslims as prejudices against their cultural inferiority based on their Muslimness (Meer & Madood, 2010; Sayyid & Vakil, 2010). According to Chris Allen, Islamophobia is 'similar in theory, function and purpose to racism' (Allen, 2010, p.194). However, prejudices about Muslims refer to their cultural 'primitiveness' and dangerousness, which emerged in modern Europe as a result of Islamist terrorism and triggered fear-based Islamophobia (Abbas, 2004; Gilks, 2019; Halliday, 2010). Anna Sophie Lauwers has offered another characteristic distinguishing between Islamophobia and racism, and it refers to the rejection of Islam, which is innate in Islamophobia and less typical for the ideology of racism (Lauwers, 2019). This is why Sayyid argues that 'Islamophobia is a concept that emerges precisely to do the work that categories like racism

were not doing. It names something that needs to be named' (Sayyid, 2014, p. 11). This 'something' is anti-Islam bigotry which is different from racism but constitutes Islamophobia.

Nevertheless, the conceptualisation of Islamophobia in this dissertation is based on both anti-Muslim racism and anti-Islam bigotry. It defines Islamophobia as fear and unfounded hostility against Muslims and Islam. Though this is an imprecise and a short definition, it facilitates the understanding of the concept. In practical terms, Islamophobia consists of any form of expression that incites anti-Muslim hatred, discriminates against them, and denounces Islam. It has roots in fear and misperceptions about Islam and Muslims as the cultural and religious 'primitive other', which brings to the fore the question of Muslim cultural integration in European societies.

Such a portrayal of Muslims is the cornerstone of European Islamophobia and a barrier to their cultural integration. Europeans have misconceptions about the Muslim religious identity and cultural traditions. They perceive that Muslim values conflict with those of Europeans. Islam is not only different but also inferior to and hostile towards the European cultural heritage. So, the Muslim question in Europe is a matter of different cultural values. However, who could blame Muslims for having their own cultural identity? It is a matter of freedom and human rights for one to believe in a particular system of cultural values. What causes the trouble of Islamophobia and cultural integration is a lack of tolerance. As Werner Schiffauer argues, a degree of toleration on the part of the host society defines how the 'significant other' - people whose values are perceived as anti-ethical to European ones, integrate into the dominant culture (Schiffauer, 2013, p.114). In a similar vein, Gabriele Marranci describes it as European fear of multiculturalism. People in Europe perceive Islam as a resistant force. They fear that Muslim cultural expressions can impact European cultural heritage. Thus, Islamophobia and the problem of Muslim cultural integration stem from the fear of a possible effect of real multicultural contacts between Muslim and European values (Marranci, 2006).

In short, Islamophobia and the problem of Muslim cultural integration lurk behind the particular image of 'self' and 'other'. In this constellation, Europeans gratify themselves with a self-image of better and more civilised people and consider Muslims dangerous and uncultured. Although Islamophobia and cultural integration are two different concepts, cultural antagonism triggers anti-Muslim sentiments and undermines the acceptance of Muslims in European societies. Therefore, both problems could be comprehended at best within the same context of different cultural values. This leads to the question of what Muslim and European cultural values are.

2.1.3. The matter of Muslim and European cultural values

A broad definition of culture is that it constitutes a system of values that define the life of people individually and in groups. Cultural values are a set of beliefs and ideas that people follow as they consider correct and essential. According to Robin Williams, cultural values represent shared abstract ideas about what is morally right, good and desirable in society (Williams, 1970). In a similar approach, Shalom Schwarz defines values as 'conceptions of the desirable that guide the way of social actors' (Schwarz, 2007, p. 4). On the other hand, Michael Frese argues that values are abstract perceptions of what is morally good or bad, forming cultural norms of behaviour (Frese, 2015). In sum, cultural values are a complex concept. What people in different cultures do or how they think has its values. A significant aspect of the theory of cultural values refers to the different perceptions about what is good and what is right. For example, Muslims believe that it is morally right for women to cover their bodies, but in Europe, female emancipation is of the most significant value. Different cultural values do not mean that one is better than the other. It is all about individual beliefs shared by many. Neither value should become the grounds for discrimination, dehumanisation and repulsion. Nevertheless, the Muslim question in Europe, which implies Islamophobia and cultural integration, comes down to the different cultural values.

A reference to Muslim cultural values should consider that these values vary according to Sunni and Shia sects, Arabs and other Muslim nationalities. However, the essential Muslim values are conceptions inspired by Islam (Faruqi, 2007). Islamic teaching defines what is morally good and right (Halstead, 2010). According to Adibah Rahim, Muslim values are the words of Allah, retained in the holy books, which teach people how to approach God, fellow humans, and their environment (Rahim, 2013). So, the most significant Muslim value is religion. This is an incentive for the proposed research to comprehend Muslim cultural values and their cultural freedom from the perspective of religious beliefs.

There are uncertainties about the definition of religion, what it constitutes and how to study it. In anthropological studies, religion is given a cultural guise. Clifford Geertz has defined it as 'a system of symbols which acts to establish powerful, pervasive, and long-lasting moods and motivations in men by formulating conceptions of a general order of existence and clothing these conceptions with such an aura of factuality that the moods and motivations seem uniquely realistic' (Geertz, 1966, p.16). This means religion is an individual and a collective value, a category of self-identification that shapes the way of living and eminently constitutes the individual's cultural identity. It becomes collective through a shared sense of belonging.

According to sociologist Emile Durkheim, 'a religion is a unified system of beliefs and practices relative to sacred things, that is to say, things set apart and forbidden beliefs and practices which unite into one single moral community called a church, all those who adhere to them' (Durkheim, 1995, p.47). Religion does not exist apart from the culture being a complex system of values. Religious beliefs, practices and morals constitute the components of culture, and in Islam, these values have been at the root of people's morals, customs and traditions. Even Samuel Huntington stresses in his discussion on conflicting civilisations, the influence of religion over cultural developments, and religion's role in cultural conflicts. He states: 'The philosophical assumptions, underlying values, social relations, customs, and overall outlooks on life differ significantly among civilisations. The revitalisation of religion throughout much of the world is reinforcing these cultural differences' (Huntington, 1993, p.27). So, the religion of individuals is a source of defining what values they stand for. The religion of community outlines the cultural form of group living, to which the individuals develop a shared sense of belonging.

Nonetheless, Islam dictates the life of Muslims and their cultural values. It teaches what is good and right and shapes Muslim cultural behaviour. However, religion does not have a similar role in understanding common European cultural values, though Christian roots are not deniable of the European cultural heritage. James Blaut suggests that until the 19th century, Europeans considered their culture to be based on Christian traditions (Blaut, 1992). Also, Huntington mentions the role of Christian heritage in European civilisation (Huntington, 1993). However, the fact that the EU has omitted a reference to Christianity from the preamble to its Constitutional Treaty indicates the secularisation of the European values (Barbulescu & Andreescu, 2009). According to Max Haller, modern European values are irreversible axiological values accepted by enlightened people worldwide (Haller, 2003). Furthermore, as François Foret and Oriane Caligaro argue, European values do not exist separately from Western institutions that protect fundamental human rights and freedoms. Therefore, European values are the values of the EU enshrined in its treaties and asserted by European institutions (Foret & Caligaro, 2018). As enshrined in the Consolidated Version of the Treaty on European Union (TEU), this implies respect for human dignity, freedom, equality, democracy, the rule of law and human rights (TEU, art.2). These values ensure European societies that inclusion, tolerance, justice, solidarity and non-discrimination prevail. Eventually, it indicates that Christianity defines the European value system, but those fundamental human rights that also guarantee equal treatment and freedom of expression for religious minorities.

Incidentally, there is a constellation of Muslim and European values. On the one hand, the Islamic religion defines Muslim values; moreover, it is the most significant value. Therefore, the freedom of Islamic religion and its manifestation equal the cultural freedom of Muslims and allow them to pursue their cultural values. On the other hand, European values rest upon the Western principle of individual liberty of thought, conscience and religion. So, if respect for European values is nothing but compliance with the universal rights and freedoms enshrined in the human rights conventions, it is unclear how such a European value system may coin the problem of Muslimness, whereas European Muslims are committed to those fundamental values. They do not undermine the human rights and freedoms of others. Scholars of modern Islamic studies argue that European Islam undergoes modernisation, which brings it in harmony with the European value system. Modern Islam reconciles Islamic faith with democracy, civil rights and equality. Thus, the cultural identity of European Muslims retains respect for universal human rights and complies with the requirements of European liberal democracy (Göle, 2012; Meer, 2008; Peucker & Akbarzadeh, 2014).

Although modern Islam fits into the European agenda of liberal democracy and the right of European Muslims to practise their culture does not undermine the fundamental European values, there is antagonism on Muslim inclusion in European societies. However, this confrontation is a matter of Muslim and European cultural values and fear of otherness. Otherness is the accompanying component of individual or group identification. In the words of Gert Baumann: 'every us exclude them' (Bauman, 2004, p.18). He states that every grammar of identity is binary or ternary in which the process of 'selfing' and 'othering' occurs. Antagonism between different cultural groups illustrates binary grammar— 'me' and 'not me' — 'we' and 'they'. 'Not me' or 'they' imply the alterity of others. In this case, 'they' are Muslims, a people of different cultural values that make 'them' different from 'us'. Baumann calls it a reverse-mirror image as 'they' are what 'we' are not (Baumann, 2004). Following this, in the perceptions of Non-Muslim Europeans, Muslims are not only different from them, but they also represent the wrong side of the dichotomy because being European is good. An illustration of this is the portrayal of Muslims as dangerous and uncivilised people.

So, it does not matter what cultural values Muslims share and how they fit into the European liberal democracy, but what is essential is that these values point out the different cultural identities they have. Since European societies dislike cultural otherness and question Muslim cultural existence in Europe, the sentiment brews cultural confrontation. However, as perceived by the West, the Muslim question in Europe would not grow to a considerable scale if European

values consisted of just universal human rights and freedoms or principles of democracy. Western societies redefined the European value system, and the West became utterly secular, so secularism came to rule the Europeanness. In that case, different cultural values specifically turn into a clash between European secularism and Muslim religiosity.

2.1.4. European secularism versus Muslim religious symbolism

The scholarly reference that Western institutions propagate European values narrows down the debate on cultural differences to the confrontation between Muslim religiosity and Western secularism. Understandably, secularism also undermines at some point the Christian values of the European countries.

Muslims are religious people whose life in all its aspects contains religious symbolism. Religious symbols are not only the expression of belonging to a particular religious faith; they are also components of a cultural system with which individuals identify themselves and reveal a way of life. British cultural anthropologist, Victor Turner, defined a symbol as ‘a thing regarded by general consent as naturally typifying or representing or recalling something by possession of analogous qualities or by association in fact or thought’ (Turner, 1975, p. 151). Hence, wearing religious symbols demonstrates one’s individuality or loyalty towards specific ideas, values and principles, and perception of life. Symbolism is the fundament of cultural identity. In his definition of culture, Geertz describes symbolism as ‘historically transmitted patterns of meaning embodied in symbols, a system of inherited conceptions expressed in symbolic forms by means of which men communicate, perpetuate, and develop their knowledge about and their attitudes towards life’ (Geertz, 1973, p.89). This means Muslim religious symbols are cultural patterns that stand for abstract concepts and ideas based on which Muslims organise their lives. The part of religious and cultural symbolism is clothing, which explains people’s cultural identity. It may express cultural values. According to Fatjti Tajuddin, ‘so close is human culture with symbols, that humans can also be called symbolic beings’ (Tajuddin, 2018, p.21). So, Muslims are symbolic beings whose way of life is part of their religion. As long as they do not undermine the human rights of others, it is their fundamental freedom to pursue their traditional way of living with God and religion. This also constitutes a fundamental value of the western liberal democracy. As a prominent representative of European classical liberalism, John Stuart Mill described: ‘The only freedom which deserves the name is that of

pursuing our own good in our own way, so long as we do not attempt to deprive others of theirs, or impede their efforts to obtain it' (Mill, 1859, p.16). Thus, Muslim religious symbolism, which does not deprive others of the freedom of pursuing their own good, does not confront European cultural values, but it is instead a problem of national cultural norms of secularism upheld by the law of the EU Member States.

The conception of good and correct results in the formation of cultural norms which individuals obey. Whereas Muslim cultural values normalised religious symbolism, European cultures banished religiosity from the ordinary life of individuals. Modern European culture, which stemmed from Christianity, increasingly centred on the principle of secularism. The term secularism was introduced in 1846 by British agitator George Holyoake to limit the influence of the Church on all aspects of human life (Rectenwald, 2016, p.72). However, this is a very moderate understanding of the term, which over the years has not referred only to the separation of the Church from the State; in modern Europe, it has omitted religion from public life as well (Philips, 2011). Secularism was introduced in European societies to guarantee equality, non-discrimination, and the rule of law, which equally protected believers, non-believers and individuals despite their different religious identities. However, modern secular societies in some EU countries such as France, Belgium, and the Netherlands have introduced a severe form of secularism that bans any expression of religiosity in public life. For example, there is a ban on displaying religious symbols at educational institutions and the workplace. On this ground, some scholars assume that European secularism has become a mechanism for assimilation of European Muslims and undermining multiculturalism (Freedman, 2004; Jansen, 2013). There are attempts to frame Islam as an enemy of secularism as it opposes gender equality, abortion, same-sex marriage. However, this type of antagonism exists in traditional Christian societies, such as the public opinion in Eastern European countries, and it is not just a 'Muslim problem'. A genuine aim of modern secularism is not to uphold the principles of western liberal democracy but to banish religious symbolism and religiosity from European public life, which above all, targets Muslims and their cultural expressions.

Hence, the 'Muslim problem' in Europe does not consist only of a clash of Muslim and European values, indicating European intolerance for Muslim cultural differences. However, it is specifically antagonism between Muslim religious symbolism and European secularism that condemns traditional religious communities. A study of the EU's cultural integration policy towards European Muslims cannot overlook these factors.

In sum, in the realm of multiple conceptualisation attempts, this dissertation suggested a simple conceptual framework, which is not exhaustive but explains the meaning of the terms as a result of deductive theoretical analysis. The table below illustrates key findings:

Table 2. Conceptual framework

Culture	Cultural Integration	Islamophobia
A value system of beliefs, customs and traditions that define the way of human life	A process of cultural acceptance and belonging, in which immigrants gradually acquire the feeling of becoming members of the host society	Fear and hostility towards Muslims and Islam expressed in disparaging Islam, discrimination of Muslims and inciting hatred against them
Cultural Values	European/EU Values	Muslim Values
perceptions about what is good and what is right	Universal principles of human rights, democracy and secularism	The religious teaching of Islam about life ⁸

Thus, the conceptualisation of the critical terms deployed in the dissertation constitutes a part of the methodology to elucidate their meaning first and then build a contextual framework for the research. It has also explained how this dissertation seeks to approach the Muslim question in Europe, which is a significant part of the EU's relevant policy assessments. Terming European Muslims as Muslim immigrants who reside in the EU unifies those with and without EU citizenship. Their cultural integration is a process of acceptance and belonging to the host European societies despite their different cultural identity. It does not refer to the cultural fusion of Islam and Europeanism, but a way of living together as equal and culturally diverse individuals. However, the question of Muslim cultural integration is not one of the different cultural values; it brings in its wake a clash between Western European secularism and Muslim religious symbolism. So, the critical reasons for Muslim cultural rejection are secularism and a lack of toleration for Muslimness. Eventually, both factors expressed in prejudices and sentiments against Muslims lead to European Islamophobia, which constitutes hostility against Muslims and Islam. It has also resulted in anti-Muslim discrimination and repulsion for their culture. In this sense, the study of the EU's role in European Muslims' cultural integration and

⁸ Perhaps this is a broad definition, but it emphasises that Muslim perceptions about the organisation of human life derive from the obedience of God.

combating Islamophobia is a complex topic. So, to avoid ambiguity, the methodology also explains the research variables and the methods of researching their correlation.

2.2. Research variables and their measurement

An explanation of Islamophobia and cultural integration and a reference to the EU policy reveals the characteristics of dependent and independent variables in this research. However, unlike the process of conceptualisation, which is a matter of abstract formulations, defining the research variables and the correlation is a strictly determined operation. First of all, anything that is not constant and can vary according to different values is counted as a variable. Second, each variable has two or more values or characteristics that determine its interaction with other variables and this process is called correlation (Harmon & Morgan, 1999). For example, the temperature is variable because it has two values of hot and cold. Therefore, in the context of how the EU addresses the 'Muslim problem' and Islamophobia in Europe, the variables are Muslim cultural integration, Islamophobia and EU's policy. Generally, there are several ways to measure the correlation. For the objectives of the proposed research, the nominal measurement can be applied. The nominal measurement refers to the classification of variables according to their nominal characteristics. For example, the temperature is also measured by degrees on a numeric scale, but its categorisation according to hot or cold is a method of nominal measurement (Hagan, 2014). According to the nominal measurement, the variability of integration is defined by its types. Since cultural integration is a conditional process of acceptance and belonging to the host society on the issue of cultural differences, it may take the form of assimilation, hybridisation or multiculturalism. Following this, the three models of cultural integration constitute the values and the measure of this variable.

Additionally, the dissertation contains the variable of Islamophobia conceptualised as fear or hostility towards Muslims and Islam, which may manifest in discrimination and cultural repulsion for Muslims. Though Islamophobia contains different forms of hostility, its values are expressed in degrees as a research variable, so it is an ordinal variable (Argyrous, 1997). Accordingly, it may increase, decrease or vanish. The values of cultural integration and Islamophobia point out that they constitute the dependent variables in this research. In the cause-effect relationship, a dependent variable implies the presumed effect of the phenomenon (Polit et al., 2001). So, which model the cultural integration of European Muslims assumes and

how the Islamophobic situation in Europe changes depends on the relevant EU policy. Therefore, the EU policy constitutes an independent variable in the research.

The EU's policy of Muslim cultural integration and combating Islamophobia could be understood as a system of particular actions aimed at a specific outcome (Wies, 1994).⁹ In its correlation with the cultural integration variable, the outcome could be the Muslim cultural integration model of either assimilation, hybridisation, or multiculturalism. So, the value and nominal measurement of the EU's cultural integration policy could be defined by the types of policy that support one of the three integration models, as mentioned earlier (Lareau, 2012). Although the range of policy types is broad in terms of cultural integration, an indicator, in this case, is the cultural freedom of European Muslims. Thus, the variation in the EU's policy approach towards this question implies a strategy of guaranteeing Muslim cultural freedom either wholly or partly or not at all.

A policy correlation in terms of Islamophobia is more complex. As explained in the introductory part on hypothetical variations, any cultural integration policy type from the three models has a concomitant effect on the combat against Islamophobia. This derives from the nexus between Muslim cultural integration and Islamophobia. Following this, as illustrated in the table of categorisation of the policy output in the first chapter, which way of combating Islamophobia the EU's policy follows depends on the type of its policy for cultural integration. Eventually, the value of the EU's policy in the correlation with Islamophobia is the same as its policy choice to support the particular model of Muslim cultural integration.

Interestingly, the correlation results are not always positive, and in terms of EU policy choice of assimilation, it vanishes Muslim cultural differences or assimilates them but does not change the ordinal value of Islamophobia. Simply, it cannot affect the fear or hostility of Europeans towards Muslims. However, it can decrease the cases of Islamophobia in numbers, as assimilation policy ensures that there are no grounds such as Muslim cultural differences, over which others could manifest their Islamophobia. However, one should bear in mind that Islamophobia as negative sentiments against Muslims and Islam and the manifestation of Islamophobia are two different variables in this context. Therefore, the table of correlations could take the following face:

⁹ In this case, it may refer to adopting laws, launching educational programs to increase awareness about Islam, expressing solidarity to Muslim communities.

Table 3. Correlation of the variables

EU Policy	Cultural Integration (Model)	Islamophobia (Sentiments)	Manifestation of Islamophobia
Assimilation	Assimilation	<i>No effect</i>	Decrease
Hybridisation	Hybridisation	Decrease	Decrease
Multiculturalism	Multiculturalism	Decrease	Decrease

With this in mind, if the research findings identify that the EU tends towards one of these policy models, the effect of such a policy on Muslim cultural integration and combating Islamophobia could be established consequently. However, the EU's policy variable contains several attributes, so it requires a proper operationalisation.

2.2.1. Operationalisation of the EU policy

In the research methodology, defining the attributes or components of the variable in question is fundamental. This process is known as operationalisation, which guides the data collection (Hagan, 2014). In terms of the EU's policy, its attributes are two types of policy instruments: First, legal policy, also known as a domain of 'hard laws'; and second, 'soft policy', often referred to as a domain of 'soft laws'. In broader terms, legal policy refers to the laws and legal norms binding on policy subjects. The 'soft policy' comprises non-binding policy measures that merely recommend steps or provide guidelines (Wallace & Wallace, 2000). Differences between these two policies imply the competence and a scale of EU policy actions.

The matter of EU competencies is a complex topic. In some policy areas, EU policymaking depends on the division of competences between the EU and its Member States. As enshrined in the Treaty on the Functioning of the European Union (TFEU), there are specific policy fields where the EU enjoys exclusive right of law-making, but in other policy areas, it may only support the Member States (TFEU, art. 3–6). However, the EU's involvement in the cultural integration of European Muslims and tackling Islamophobia overlaps various policy areas, including human rights, immigrant integration, culture, education and religion. This aspect provides for various legal or 'soft policy' instruments that the EU may apply to address these problems. For example, the definition of the EU's legal competence under articles 3, 4 and 5 of

the TFEU indicates that immigrant integration, education, culture and religion are outside the scope of the EU's legal policymaking and in these areas, it may only supplement the action of its Member States through recommendations and guidelines (TFEU, art.3–5).

Nevertheless, the same Treaty entitles the EU to adopt laws on equality and non-discrimination to uphold fundamental human rights in the community law. In a reflection of the spirit, cultural and religious concerns have received great importance over the last decade in the legal context of the EU. Certain aspects of religious and cultural diversity have been framed in the past by the EU's law. For example, the EU adopted two directives related to discrimination: First was the Employment Equality Directive, which combats discrimination on any grounds against employment (Council Directive 2000/78/EC); and second, the Racial Equality Directive, which banned direct or indirect discrimination on racial and ethnic grounds while accessing public good and social services (Council Directive 2000/43/EC). Though the Employment Directive does not explicitly address Islamophobia, it prohibits discrimination at employment based on religion; hence Muslims can evoke it. For instance, in 2017, the Court of Justice of the EU gave a ruling of reinstatement in two cases, *Achbita v. G4S* and *Bouagnaoui v. Micropole SA*, which were brought by female employees from Belgium and France who were dismissed from the job because they wore headscarves (Case C-188/15; Case C-157/15).

On the contrary, the Racial Equality Directive does not list religion amongst the grounds of discrimination, so Muslims cannot evoke it to find the remedy. However, a significant point here is that the Council could broaden the law on the prohibition of discrimination and include religion as recommended years later by the European Commission (European Commission, 2008). This indicates that a problem is not a matter of EU competencies but a lack of political will.

Having said that, although it is not in the legal nature of the EU to adopt laws on culture and religion, the legislations mentioned above prove that its legal framework concomitantly addresses or could address the issues of cultural freedom of European Muslims and Islamophobia, thereby producing an effect on the ordinary life of Muslims in the EU. On the other hand, if the EU chose to do nothing about certain aspects of Islamophobia, this also leads to particular results, so the policy of 'doing nothing' is a policy too (McConnell & Hart, 2019, p. 645). Nevertheless, the EU's policy on Muslim cultural integration and combating Islamophobia comprises a legal framework on human rights protection, which covers the cultural and religious rights of the European Muslims, and a mechanism of 'soft policy'

instruments to coordinate the actions of the Member States in the areas of culture, education and immigrant integration.

The EU’s ‘soft policy’ on the cultural integration of European Muslims and combating Islamophobia provides common, non-binding basic principles developed to eliminate Islamophobia and to facilitate the cultural integration of Muslim newcomers as well as Muslim third-country nationals with a migration background who may or may not be EU citizens (Peters, 2011). In this sense, the research is interested in the EU's strategy for cultural integration and its policy initiatives on the intercultural dialogue between Muslim immigrants and the representatives of host European societies over their cultural differences. It also focuses on educational programs for raising awareness about immigrant cultures and the threat of Islamophobia.

Appropriately, the dissertation undertakes a study of the EU's legal policy towards cultural integration of European Muslims and combating Islamophobia under the following components: freedom of religion, non-discrimination on religious grounds, prohibition of hate speech and hate crimes against Muslims. As it appears, in the study of the EU legal framework on Islamophobia and Muslim cultural integration, the research shifted its entire focus on the legal aspects of religious freedom. It has grounds in the assumption that the religion of Islam defines common Muslim cultural identity. It directs their way of living and conceptions of what is ultimately good, proper, or desirable in human life (Graeber, 2001, p.1). Thus, freedom of religion and elimination of discrimination based on religion entail equal opportunity for all to follow their cultural traditions, and by this means, it becomes crucial in fostering cultural integration of Muslim immigrants (American Anthropological Association, 1999). With this in mind, the table below illustrates the operationalisation of the EU policy variable:

Table 4. Operationalisation of the EU policy

Legal Policy				‘Soft Policy’	
EU Human Rights Law				Cultural Integration Strategy	
<i>Anti-discrimination</i>	<i>Freedom of religion</i>	<i>Ban of hate speech</i>	<i>Ban of hate crime</i>	<i>Multicultural education</i>	<i>Intercultural dialogue</i>

In sum, the operationalisation of EU policy as a research variable overlaps the discourse on several attributes which fit in different ranges and categories. On the one hand, it refers to the legal aspects of Muslim religious rights and liberties, non-discrimination, and combating anti-Muslim hate speech, as well as hate crimes. On the other hand, the operationalisation of the EU's policy towards the Muslim cultural integration and Islamophobia has a 'soft' dimension and implies elaborating on cultural integration strategies, raising awareness about Muslim culture through educational programmes, and facilitating intercultural dialogue to negotiate on the cultural differences between Muslim immigrants and members of European societies. Considering this, naming the attributes of the EU policy stipulates the selection of proper data collection and analysis methods.

2.2.2. Data collection and analysis

Data collection and analysis is a process of gathering information on the variables of research interest and examining it in the light of the research question to establish the correct pattern of correlation amongst several hypothetical variations (Lewis-Beck, 2004). This dissertation addresses the question of the EU's role in the cultural integration of European Muslims and combating Islamophobia. Thus, the scope of data collection comprises the official statements, policy papers, and legal documents of the EU and its institutions related to these topics. The sources of the data are EU official journals, the Eur-Lex page that offers access to EU laws and EU case laws, the EU official web page, and the web page of the European Commission.

Considering the aspects of operationalisation, which defines the particular attributes of the variables, there are only certain types of documents that are the units of analysis for research purposes. In the domain of the EU's legal policy, data collection takes place around the human rights laws of the EU related to religious liberty, prohibition of discrimination, as well as hate speech and hate crimes based on religion. In this sense, the research focuses on the EU's relevant treaty provisions, directives and case laws of the Court of Justice of the European Union (CJEU) as they constitute the EU's legal policy on the cultural integration of European Muslims and combating Islamophobia. The EU has developed its legal framework for human rights protection and prohibiting discrimination over the last two decades. It comprises previously mentioned two directives prohibiting discrimination on various grounds, amongst which only the Employment Directive provides a legal basis for the protection of Muslims against

discrimination on religious grounds (Council Directive 2000/78/EC; Council Directive 2000/43/EC). In addition, the rulings of the ECJ in the cases of Ms Achbita and Ms Bougnaoui following Council directive 2000/78/EC to prohibit discrimination on the religious basis at employment belongs to the EU's legal framework on protecting Muslim cultural freedom (Case C-188/15; Case C-157/15). The rulings of the CJEU have proved to be a benchmark in this regard. Furthermore, in 2000, the EU adopted the Charter of Fundamental Rights of the European Union (CFR), which has the same legal standing as founding treaties of the EU. The Charter guarantees the protection of religious liberties and prohibits any types of discrimination, including on religious grounds (CFR, 2000). Apart from this, the EU adopted in 2008 the Council's Framework Decision 2008/913/JHA on combating certain forms and expressions of racism and xenophobia through criminal law (Council Framework Decision 2008/913/JHA, art.13). This document, along with the Victims' Rights Directive (Directive 2012/29/EU) and the relevant case law, is a basis for prohibiting anti-Muslim hate speech and hate crimes at the community level. Thus, these legal documents are the subject of analysis to conclude the EU's legal policy approach towards cultural integration of European Muslims and Islamophobia.

The data collection also includes in its scope of search the EU's 'soft policy' domain, which comprises a wide range of documents related to Muslim cultural integration and Islamophobia. Nevertheless, the research focuses on the art of policy formulation, which contains more detailed information about the EU's strategy on the cultural integration of third-country nationals and its educational initiatives and the reference to intercultural dialogue. Such a range of documents comprises the European Commission's communication, which is issued regularly, to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the common agenda for a framework for the integration of third-country nationals in the European Union. In addition, the research studies other non-binding policy documents related to intercultural education and dialogue issued by the European Commission, European Parliament and the Council. This facilitates an understanding of how the EU uses its 'soft policy' instruments to address the inclusion of culturally different groups and combating Islamophobia.

However, data collection cannot lead to research findings without the accompanying process of data analysis. In order to analyse gathered documentary evidence for qualitative research, there are many ways of interpreting the documents and ascribing meaning to the texts. For understanding the EU's legal and 'soft policy' documents, the research utilises the technique of content analysis, which refers to studying the text's latent content by reading it entirely and

making an overall assessment of it (Babbie, 2010; Bowen, 2009). However, in the documents and official statements of the EU, the subject of interest is the content and the language, a choice of terms, and the type of formulations according to the context. Hence, the research also deploys the method of discourse analysis. It examines the language and the meanings created in the particular context (Johnstone, 2008; Tannen et al., 2015). Applying such qualitative methods may raise the question of reliability. The results acquired from the content analysis cannot be double-checked unless one reads all of the documentary evidence (Hammersley, 2007). On the contrary, an analysis of the EU's official documents and statements is the only appropriate and valid method to research the EU policy and its implications for the cultural integration of European Muslims and combating Islamophobia in Europe. The analysis makes it possible for the researcher to pay attention to the EU's political language and its wording and interpret it in the context of Muslim cultural freedom and Islamophobia.

To sum up this paragraph and the entire chapter of methodology, it explains the main concepts related to culture, cultural integration, Muslim and European values, religion, and secularism. It also elucidates the technical aspects of the research, defines the dependent and independent variables, their attributes and correlation patterns. Lastly, this chapter introduces the method of data collection and analysis, which is a way of reaching the research findings regarding the EU's role in the cultural integration of European Muslims and combating Islamophobia.

However, despite this comprehensive approach, methodological references cannot fully elucidate all significant aspects of the research scope, such as how Islamophobia manifests itself in different forms or what scholarly findings are regarding integration models and policies. There is a realm of theories on Islamophobia and cultural integration, which offers a deep understanding of both phenomena. Thus, the following chapters of the dissertation are dedicated to the critical overview of academic knowledge generated over the decades in the domains of Islamophobia and cultural integration. It counts as a strategic approach to studying the relevant EU policy, which cannot be analysed in-depth unless there is a complete understanding of what Islamophobia and cultural integration constitute.

Chapter III. Scholarly debates on European Islamophobia and Muslim cultural integration: A literature review

This chapter explores different dimensions in the scholarly debates on Islamophobia, focuses on the crisis of multiculturalism in Europe and examines scholarly references to the EU in this context. It discusses theoretical approximations of Muslim question in multicultural Europe and Islamophobia to that extend to elucidate key scholarly assumptions on the origins, manifestations, and definition of Islamophobia and the cultural integration of Muslims. Though there is no universal understanding of the grounds for 'cultural othering' of European Muslims or what Islamophobia is and how it emerged, the aim is to find intersections of different theoretical assumptions. At the same time, discussions and analyses in all directions, presented in this chapter, indicate the stand of academic scholarship on the topic of Islamophobia and cultural integration of European Muslims with slight reference to the EU. A gap in existing literature explains the relevance and significance of the current research.

Broadly speaking, literature on the topic of Islamophobia and about the question of European Muslims, who belong to the immigrant groups and are religious minorities in Europe, contains academic knowledge generated over the last decades in five primary domains:

- Origins of European Islamophobia¹⁰
- Modern trends in the Islamophobia discourse
- A working definition of Islamophobia
- Muslims as cultural 'other' and a crisis of multiculturalism policies
- Muslim question in the context of the EU policy

3.1. Origins of European Islamophobia

Islamophobia and Europe's struggle for the cultural integration of Muslim immigrants have been a topic of academic discussions over the last few decades. The primary question in this regard refers to an understanding of Islamophobia, which some scholars discussed in the following chapters, preferred to approach from the historical and political perspective toward

¹⁰ It is a misconception to consider that Islamophobia has the same origins in all parts of Europe. However, the literature on this topic comes from western scholars who generalise the origins of western European Islamophobia all over Europe.

factors and events that gave birth to the so-called phenomenon. However, the quest for the origins of Islamophobia turned out to be far more sophisticated than its definition.

An initial confusion in the study of the origins of Islamophobia refers to the dissension of two views: Islamophobia as a historical phenomenon and Islamophobia as a political concept.¹¹ On the one hand, a group of scholars focused on the study of Islamophobia starting from the period when it first appeared in political debates. On the other hand, some scholars prefer to comprehend the origins of Islamophobia not just as a political concept but primarily as a historical phenomenon.

Another peculiarity lies in the lack of consensus amongst scholars within each group. It means that scholarly assumptions about the political debates on Islamophobia and its historic origin are dissimilar. Nevertheless, they all stipulate a common understanding of how complex and multiform Islamophobia is.

3.1.1. Beginning of political debates about Islamophobia

Discussions about the origins of Islamophobia as a political concept refer to the first time the issue has appeared in political debates in Europe. According to the Middle East Studies Association of North America (MESA) and some prominent scholars, such as Matti Bunzl and Brian Klug, the origin of Islamophobia as a concept dates back to the 1990s. This was when political activists drew attention to the prejudices and actions against Islam and Muslims in western European societies (Bunzl, 2007; Klug, 2012; MESA, 2012). Furthermore, the subject of conceptual origins of Islamophobia has been thoroughly discussed in their writings. In his book *Anti-Semitism and Islamophobia: Hatreds old and new in Europe*, Bunzl argues that the political concept of Islamophobia was invented at the end of the 20th century to describe the phenomenon of anti-Muslim sentiments that had already been soaring in Europe as a result of global Muslim terrorist attacks. It acquired a political dimension when anti-Muslim hostility threatened the new, supranational and united Europe (Bunzl, 2007).

Contrary to Bunzl, his contemporary Klug states that the emergence of Islamophobia as a concept in political debates in the late 20th century was not an invention of some interested

¹¹ Some policy actors do not accept Islamophobia as a political concept, and sometimes it is named as anti-Muslim hatred, anti-Muslim racism or anti-Muslim discrimination.

groups. The term was used in a political context without any pre-determination in response to the increased anti-Muslim hatred after a series of Islamist terrorist attacks in Europe, which began in the 1990s (e.g. the 1995 France bombings, when Armed Islamic Group [AIG] through its activities portrayed Muslims as the enemies of Europe). Klug adds that the terrorist attacks in the USA on 11th September 2001, which strengthened anti-Muslim sentiments in Europe, gave a strong impetus to the ultimate inculcation of the concept of Islamophobia in the minds of people. The scale of the 09/11 attacks had a negative impact globally on attitudes towards Islam and Muslims. Islam became the religion of terrorists, which posed a significant threat to global peace and stability. So, recurring instances of hatred against this religion and its followers naturally led to the coinage of the term (Klug, 2012, pp.665-66). Though Bunzl and Klug do not share the same idea about the invention of Islamophobia as a political term, they agree on the social and political context that led to this concept's appearance in political debates.

Similarly, the idea about the date and the context of Islamophobia emerging as a political term is shared by Erick Bleich, a representative of the MESA. However, he introduces some specifications in the discussion. Bleich named the 1997 publication of a report titled 'Islamophobia a challenge for us all' by the British research organisation Runnymede Trust as an initial source. He also writes that Islamophobia started to evolve in the 1990s as a political concept and continues to evolve that it addresses history, presence, dimensions, intensity, causes and consequences of anti-Muslim sentiments in the global context. The evolution of Islamophobia did not start with the Muslim terrorist attacks in the last decades, but the concept has been nestling in the generally misleading ideas and stereotypes about the Muslim world, which are rooted deep in history (Bleich, 2012). In this sense, Bleich does not disagree with the date or political reasons linked to the appearance of the phenomenon in political debates. However, he emphasises the historical misperceptions about Muslims and Islam, which existed in Europe long before the beginning of Islamist terrorist killings.

This emphasis of Bleich's brings the discussion to the point where the historical origins of Islamophobia and its first appearance as a term in political debates emerge as two different questions. However, it would be a misinterpretation to claim that either Bunzl or Klug neglected the role of historical factors in the evolution of anti-Muslim sentiments. Klug emphasises that Islamophobia as a factor in the discrimination against Muslims and the prejudices against their cultural values had impacted Muslim communities and their life in western societies much earlier than the political term appeared in the media discourse (Klug, 2012). However, Sayyid argues that the phenomenon and the coinage of Islamophobia are related to the colonial past.

According to him, the 'enduring appearance' of the term Islamophobia occurred in 1997 in the Runnymede report, but it developed in France in the colonial context around the 1920s (Sayyid, 2014, p.13).

The political debates about Islamophobia may have started in the 1990s with the Muslim terrorist attacks, but the birth of this coinage and the cause of anti-Muslim attitudes lurk in far corners of history. It is significant to draw a line between the political concept of Islamophobia and its historical implications. Although it has been acknowledged that the impact of Islamist terrorism triggered anti-Muslim sentiments globally, the hatred towards Muslims and prejudices against their 'cultural inferiority' existed much earlier than the genesis of Islamist terrorist movements. It is crucial to comprehend Islamophobia as a continuing and dynamic phenomenon which continued throughout the history of Muslim-Christian religious wars and the cultural hegemony of the West.

3.1.2. Historical origins of European Islamophobia

There are boundaries between the historical phenomenon of Islamophobia and the term which appeared in political discourse at the end of the 20th century. The political debates started later owing to the security problem caused by the Islamist terrorist attacks and from it rose hostilities against Muslims, but everything this concept describes has been characteristic of European societies throughout history. An illustration of this idea can be found in the writings of historians such as Thomas Asbridge, James Arthur Brundage and Norman Housley, who described how humiliating was the portrayal of Muslims by European Christians in medieval times (Asbridge, 2012; Brundage, 2003; Housley, 2006). It may count as the earliest origin of Islamophobia. It refers to the series of religious wars initiated by the Latin Church in the 11th century, which were called Crusades. The term describes especially Eastern Mediterranean campaigns against Muslims, which were launched between 1096 and 1271 to conquer the Holy Land from Islamic rule. Some historians also trace the Crusades back to Ottoman conquests and the battles of Eastern and Central European states for the expulsion of Muslims from their territories. Those engagements are known in history as the Ottoman–Habsburg wars when crusading against Muslims were at times supported by the Holy Roman Empire, the Kingdom of Hungary, the Polish–Lithuanian Commonwealth, and Habsburg Spain (Pál & Géza, 2000).

Those Muslim-Christian wars at different times and led by different European countries greatly influenced the spread of anti-Muslim and anti-Islam hostilities amongst European Christians.

However, the history of Islamophobia continued in the colonial period, when prejudices against 'uncivilised', 'uncultured' groups of people living around Europe and the invented image of Orient soared to a level that affected even postcolonial literature. This has been depicted in Edward Said's book about orientalism, in which he described the life of a Palestinian Arab in Western society and presented examples of hostility he had experienced in everyday life (Said, 1977). On the other hand, Franz Fanon and Gayatri Chakravarty Spivak are postcolonial scholars who address the European discriminative attitudes towards culturally different people and their demonisation (Fanon, 1961; Fanon, 1967; Spivak, 1994).

It is not controversial that the political term 'Islamophobia' is young compared to the historical anti-Muslim and anti-Islam sentiments in Europe, which have contributed to the concept of Islamophobia. In the study of its historical origins, scholars found parallels with the Muslim-Christian wars and European colonialism.

3.1.2.1. Islamophobia in medieval Europe

Despite some scholarly attempts to call Islamophobia a modern European phenomenon, its origins go back to medieval times when Muslim conquerors threatened Christian Europe. For further illustration, this paragraph cites some examples of the already mentioned 11th-century crusades. It was a period of great hostility between the Muslim and Christian worlds, which was termed Holy Wars. They started with the first crusade called in 1095 by the Catholic Pope Urban II to free the Holy Land of Jerusalem (Phillips, 2010, p. 22). Christian Pope convinced his soldiers that Jerusalem, a symbol of Christendom, was in peril by 'a race utterly alienated from God' – Muslims, who were capable of great brutality. Therefore, 'all who die by the way, whether by land or by sea, or in battle against the pagans, shall have immediate remission of sins' (Asbridge, 2012, p.33). The letter of Pope Urban II is full of attempts to dehumanise the enemy. He refers to the inhuman treatment of Christian warriors in the captivity of Muslims in the following manner:

‘The cruelty of these impious men goes even to the length that, thinking the wretches have eaten gold or silver, they either put scammony in their drink force them to vomit

or void their vitals, [...] they stretch asunder the coverings of all the intestines after ripping open their stomachs with a blade and reveal with horrible mutilation whatever nature keeps secret' (Asbridge, 2012, p.37).

Influenced by the myth of Muslim savages invented by the Church, crusaders considered themselves the chosen people who had the sacred mission to rescue the 'Kingdom of God' from heretic Muslims. They usually referred to Muslims as 'dogs' or 'Saracens' which meant people from the East (Brundage, 2003). This testifies that many Europeans already had perceptions of dangerous Muslims as the cultural 'other' in medieval times. Furthermore, some scholars argue that before racism was coined based on biological traits, religious differences have been at the centre of racial attitudes (Blaut, 1999; Kaplan, 2018). Not all scholars share the idea about racialising Muslims, but those who do so could consider it prudent that Christian Pope racialised Muslims when he referred to them in his letter as a 'race alienated from God' (Asbridge, 2012, p.33). In this respect, Geraldine Heng argues that the term race obtained in the past historiography describes a group of culturally inferior people, which points out that medieval time racism was a matter of cultural classification (Heng, 2018, p. 11).

Furthermore, Ann Laura Stoler suggests that the era of scientific racism, which focuses on the biological aspects of the concept, should not influence the exclusion of medieval ages from the history of race because how Europeans treated Muslims in the middle ages was both cultural and religious racism (Stoler, 1997, p. 189). Also, according to Hussain Othman, Muslims were portrayed as savages because their cultural and religious identity led to the demonisation of the 'race' and bigotry against Islam (Othman, 2014, p. 97). Muslims were perceived in the West as pagans, and therefore, the religion of Islam was viewed as paganism in Europe. This leads to a general assessment of the attitudes of medieval Europe towards Muslims and Islam as Islamophobia. However, some may argue that the Holy Wars began because of territorial disputes and were well-founded, rational hostility against Muslims. Nevertheless, an analysis of the crusading chronicles points out that the Holy Wars went beyond the ordinary military conflicts between Muslims and European Christians. The Christian Pope ascribed to Muslims such brutalities as could not be committed by a human being. In fact, the revival is never a rightful chronicler of doings of the enemy. Parties engaged in war always spread stories about the cruelties of the other side, seeking to portray the war as one between good and evil. Nevertheless, European religious and cultural racism against Muslims, bigotry against Islam stood on prejudicial grounds. In other words, Muslims were hated not only because they had

conquered Jerusalem but because of the widespread prejudice that they were dangerous, uncultured savages and pagans.

Thus, while studying the origins of Islamophobia in Europe, one should not overlook the medieval confrontation between two religious worlds, Muslims and Christian Europe, which led to misperceptions of the Occident about the inhumanity, cultural backwardness and religious heresy of 'oriental people'. The historiography of the Holy Wars testifies to the earliest origins of anti-Muslim hatred and anti-Islam bigotry, which should be considered in the analysis of contemporary Islamophobia.

However, the literature review on Muslim-Christian wars in the context of Islamophobia indicates that western scholarship equates Europe with western Europe and overlooks the role of Ottoman conquests of eastern and central Europe in the formation of anti-Muslim sentiments there. It would be rational to grant scholarly attention to the Muslim-Christian wars in Eastern and Central Europe while talking about the historical origins of European Islamophobia. This is a suggestion based on the perspective that if modern Islamophobia, according to some scholars, lurks so deep in the history of the Holy Wars, then the Ottoman conquest could also become a historical factor. Nevertheless, the domination of western scholarship in Islamophobia studies treated Islamophobia as a western phenomenon. Interestingly, colonialism played a significant role in this respect. It illustrated that Islamophobia was coded into the western European cultural consciousness.

3.1.2.2. Colonial origins of Islamophobia

After the Holy Wars, colonialism constituted a historical period that incited antagonism between Muslims and European Christians. The Islamic part of the world was subjugated through colonisation. According to Karen Armstrong, the European invasion of the Islamic world was not uniform, but it was thorough and effective. They vanquished the entire Orient and Muslims of Africa. It began with the defeat of the Moghuls in the second half of the 19th century when British rule was established in India through military conquests. Colonisation continued to swallow one Islamic country after another. Between 1830 and 1915, Algeria, Aden, Tunisia, Egypt, Sudan, Libya and Morocco were in the hands of either France or Britain. By an agreement, the territories of the Ottoman Empire, except modern Turkey, were divided amongst European colonisers (Armstrong, 2000, p. 27).

Interestingly, colonialism was almost concomitant to the decline of the Ottoman empire up to its final collapse through the Balkan wars, after which Ottomans lost a bulk of European territories (Fanani, 2013). However, the scholars of colonial studies discussed below take a narrow historic angle over territorial redistributions in this part of the world. They focus on colonialism, which arguably did not consist in European military invasions of the Islamic world only; it also brought to light the racial attitudes of Europeans towards Muslims, who appalled the former as culturally backward, corrupt and religiously fanatic people. Again, these events had a tremendous influence on soaring anti-Muslim and anti-Islam prejudices that defined a new Islamophobic reality in the Occident.

Thus, some scholars, such as Salman Sayyid and Nasar Meer, start their discussions on the origins of Islamophobia right from the colonial era. This approach may rest upon the assumption that colonialism is a later phenomenon on the timeline, compared to the Holy Wars and stands closer to modern times. At the same time, it emphasised the superiority of Europe and its cultural heritage, which laid the foundation for European Islamophobia. In fact, medieval crusaders and later on colonialists both demonised Muslims and incited hatred against them at different times. Nevertheless, a direct link between the Islamophobia of modern times and the historical hostilities towards Muslims has been sought by prominent scholars in the colonial context. This was elucidated in the writings of Sayyid, who discussed the racial phenomenon of Islamophobia in the nexus with colonialism. He explained that European colonialism peripheralised the Orient and portrayed Muslims as uncivilised people (Sayyid, 2013; 2018). Sayyid argued that in the West, they always had prejudicial ideas about Muslim cultural backwardness, and colonialism was an expression of such a pre-conceived idea about inferior Muslim culture, which constituted Islamophobia. Furthermore, in the article *Islamophobia and the Europeanness of the other Europe*, Sayyid emphasised that colonialism reflected superior European self-image, which was a fundament of the European cultural identity (Sayyid, 2018).

A slightly different approach to studying the causes of Islamophobia from the perspective of colonialism is found in the works of Nasar Meer. In his article, the British scholar discusses *Islamophobia and postcolonialism: continuity, orientalism and Muslim consciousnesses*, how anti-Muslim sentiments continued from European colonialism through the postcolonial period and to the present. He argued that the colonial attitudes found their reflection in orientalism by dehumanising Muslims in the West. Only after that, in the postcolonial era, did the prejudices about primitive Muslim culture provide the foundation for Islamophobia (Meer, 2014). Whereas Sayyid considered Islamophobia a coinage of European colonialism, Meer discussed

Islamophobia as a postcolonial phenomenon with colonial-era discrimination and hatred against Muslims providing impetus to it. Despite dissension, Sayyid and Meer both are right in their argumentations. Islamophobia was an expression of colonialism, but it also subsisted in the postcolonial era. This has been well-depicted in the postcolonial literature of Edward Said, Franz Fanon and Gayatri Chakravorty Spivak.

Said's *Orientalism* is an essential study on Islamophobia. In his book, he stated that Europe had an invented image of the part of the Orient where cultural values had been inspired by Islam (Said, 1977). Said says the constellation of Orient and Occident portrays the division between 'them' and 'us' in which the Occident is the economically, technologically, politically and culturally dominant 'Us' (Said, 1977, p. 7). The vision of the Orient as inferior was built up throughout the colonial period. So, it is a rational acknowledgement that the political domination of Western countries gained through creating colonies in the oriental world encouraged the West to see itself as culturally dominant. This fostered negative attitude towards Muslims and Islam in postcolonial Europe. Said's theory of postcolonialism traces the colonial heritage which was responsible for creating the false image of 'primitive other'. Though Edward Said provided the cornerstone of the critical postcolonial theory, he was not the only scholar who unmasked western orientalism. After decolonisation, scholars from former colonies were able to publish their critical writings on the image of non-Europeans fabricated by the West.

A prominent postcolonial theorist, Fanon, made a significant contribution to postcolonial scholarship by analysing the psychology of the coloniser and the colonised people in his books *The Wretched of the Earth* and *Black Skin, White Masks* (Fanon, 1961; 1967). According to Fanon's theory, the interaction between the coloniser and the colonised was a form of relationship in which the coloniser developed a self-identity as a superior colonial master, and the colonised people became the inferior, primitive 'other' (Fanon, 1961: pp. 15-17). Furthermore, in his later work *Black Skin, White Masks*, Fanon depicted the psychological conditions of the natives who were colonised and who, in principle, accept this kind of hierarchical image imposed by the colonisers. In the decolonised world, people from former colonies still were under pressure to adopt western values. Furthermore, they strove to fit the mask of the white man to deal with their insecurity (Fanon, 1961).

Social and cultural patterns of colonialism, as depicted by Fanon, have implications for modern Islamophobia. Similarly to Said, Fanon described a phenomenon of 'selfing' and 'othering', which laid the foundation for the cultural racism of western white people against others. He emphasised that it did not matter who stood on the other side of the polarisation—a

Muslim Arab or an African man—they were doomed to wear a label of uncivilised people because Muslims and Africans had never been equals of their colonial master. This pattern of subordination did not collapse with the institutional death of colonialism. Muslim immigrant suburbs near Paris, Muslim ghettos in Denmark are modern reincarnations of colonialism. The colonial masters have transformed into modern white European men and women who never see an equal cultural being in Muslims. Eventually, such perceptions of and stereotypes about Muslims lead to hostility and discrimination, which merit Islamophobia.

Another prominent figure amongst postcolonial scholars who criticises Eurocentrism is Spivak. She is a Bengali theorist from India and the author of the essay *Can the Subaltern Speak?* (Spivak, 1994). By the word 'subaltern', she meant people of inferior rank, who were deprived of any rights during the colonial era and fought throughout the colonial times to free themselves from western oppression. By this writing, Spivak gave voices to women, people from the Orient, and tribal people, who could speak, but their words were never heard. Spivak unmasked foreign dominant groups—the elite—who were convinced about their cultural superiority and robbed colonised people of their rights. They created a false image of the natives of the colonies as uncultured, without any pre-colonial history (Spivak, 1994). In her essay, Spivak described the invented image of 'subalterns', or as Said names them, the 'Other', which imperial powers have gradually constructed. The 'civilised' Europe turned its colonised subjects into underprivileged people whose cheap labour enriched the West. In return, Muslims and other subalterns received humiliation and were demonised.

In sum, postcolonial scholarship illustrated the life of formerly colonised people and their fight for equality. They were not colonised anymore, and in the postcolonial era, they became natives of the modern-day Third World. They are not accountable anymore to their colonial master but are viewed by the West as inferiors—the 'primitive other'—with no cultural values. Postcolonial writers analysed the colonial attitudes based on their own experiences and perspectives. Said was a Palestinian who encountered discriminative attitudes of the Western society and wrote the critique of colonial and anti-Muslim attitudes from the perspective of the Orient. Fanon and Spivak illustrated colonial and postcolonial experiences using the examples of black people, tribal people and women of postcolonial countries. In the end, the postcolonial theory could be generalised to each individual from the modern Third World. The 'subaltern' becomes every one who is non-European and strives to be seen as equal to a European through adaptation to European lifestyle and customs. Postcolonial theory is the most crucial part of modern racial studies.

Thus, a study of the historical origins of European Islamophobia extends to the medieval confrontations between two religious worlds—Muslims and Christian Europe—and colonial misperceptions of the Occident about the inhumanity, cultural backwardness and religious heresy of oriental people. These factors helped shape cultural or religious prejudices against Islam, thereby fanning cultural racism and extreme fear and hatred of Muslims. However, European Islamophobia would probably remain in the past or would not surface and wax in the present times if certain events of the last decades did not renew the old hatred against Muslims. However, a range of recent factors such as Islamist terrorism, migration, Islamophobic literature, and mainstream media kept fuelling the flames of modern Islamophobia in Europe.

3.2. Modern trends in the Islamophobia discourse

Islamophobia is a complex topic, and so are discourses about Islamophobia. If Holy Wars and colonialism are the two main factors connected to the historical origins of Islamophobia, many others influence its continuity into modern times. First in the line comes 'Islamist terrorism'. The beginning of political debates over Islamophobia in the 1990s resulted from soaring fear and hatred of Muslims or Islam, which represented a counter-reaction to killings by Muslim terrorists. Following this, some scholars addressed Islamophobia from the perspective of security narrative and terror-based Islamophobia. For example, Tahir Abbas drew a line between old and modern-time Islamophobia. In his discussion, the theory of orientalism is about the 'old' racism, and modern Islamophobia is part of 'new racist discourse', which found its nexus with Islamist terrorism and explicitly with the 9/11 events (Abbas, 2004, p. 30). Abbas describes the modern Islamophobia discourse as a post-9/11 phenomenon, where populist politicians have used people's fear of Islamist terrorists to demonise Muslims by focusing on the 'war on terror' instead of drawing boundaries between ordinary Muslims and fundamental Islamists (Abbas, 2004, p. 30). It is a significant point in his assumption that Islamophobia is not a direct product of Islamist terrorism, but populist politicians and interested groups subscribing to right-wing nationalism played a key role in ensuring such a scenario. They used terrorist threats as a lever of manipulation and convinced people of Islam's danger (Abbas, 2004, p.30).

Similarly, Fred Halliday and Mark Gilks describe modern anti-Muslim and anti-Islam hysteria in their writings in the light of security, fear of Islam and the emergence of social

prejudices against Muslims (Halliday, 2010; Gilks, 2019). In his article *Islamophobia Reconsidered*, Halliday argues that news about Islamist terrorism has triggered a tendency towards political alarmism. This is concerned with the view that there are no different kinds of Muslims but that all Muslims are terrorists. It is Islam that poses a danger as a religion of terrorism, so everyone who follows the teachings of Islam is a threat to public security (Halliday, 2010: pp.897-99). This view has been shared by his contemporary Gilks, who studied the stigmatisation of Muslims in parallel with the security narratives about Islamist terrorism. He examined socio-political discourse before and after a series of terrorist attacks, referring to 9/11 events in the USA and killings in Madrid and London in 2004–2005. Gilks concluded that attitudes in Europe towards Muslims were less hostile until those events occurred and that Islamist terrorism fuelled fear and hatred against Muslims in the West (Gilks, 2019).

What Abbas, Halliday and Gilks discussed of Islamist terrorism resembles the descriptions by medieval scholars of western attitudes towards Muslims in the age of crusades, implying their portrayal as dangerous, uncivilised people capable of great brutality. The main difference between the old-time fear or hatred of Muslims in the age of crusades and the recent hysteria about Islamist terrorism is that instead of Muslim worriers, a group of Islamist terrorists became the ugly face of the whole Muslim world. Otherwise, the old and new narratives about Muslim 'savages' remain strikingly similar. Furthermore, though scholars of security studies (Pratt, 2010; Rohr, 2017; Sundberg, 2020) acknowledged that religious terrorism was not only a Muslim phenomenon and that it constituted an expression of religious fundamentalism, which could be related to any other religious identity as well, thanks to populist politicians and other interest groups, terrorism is predominantly associated with Islam, which fuels modern Islamophobia. This factor is responsible for depicting modern Islamophobia as a phenomenon related directly to Islamist terrorism and minifying its historical origins of the phobia. However, it is not the only impetus that helps the coining of Islamophobia in contemporary European discourse. An influx of Muslim immigrants and refugees and anti-Muslim and anti-Islam narratives in media and literature play a significant role in this process. Therefore, it is rational that those topics come under the focus of modern Islamophobia scholarship.

3.2.1. Anti-migrant Islamophobia and a crisis of liberalism

Migration is an old phenomenon, which is not always considered a positive one. After the series of radical Islamists' terrorist attacks in Europe, Muslim immigrants were labelled as potential terrorists whom Europeans should fear because they came to take over 'us', dismantle European culture and well-being. However, before the terrorist threat, Europeans were never excited about the idea of culturally different Muslim immigrants living amongst them and threatening European cultural homogeneity. Therefore, different aspects of how migration trends impacted anti-immigrant Islamophobia in Europe have been depicted in scholarly writings.

According to Stephen Zune, before the 2015 refugee crisis, the inflows of immigrants from Muslim countries¹² to Europe were a common phenomenon, but 2015 became a turning point of anti-migrant and anti-refugee Islamophobia. Far-right parties participating in parliamentary elections in different European countries started basing their political campaigns on the demonisation of Muslim immigrants and refugees (Zune, 2017: pp. 3-4). Though Zune is right about the role of far-right parties in the facilitation of anti-migrant Islamophobia, it is not entirely true that the rise of anti-Muslim and anti-immigrant sentiments is related to the 2015 refugee crisis. In fact, anti-immigrant sentiments in Europe have a long history.

In the 1950s, when immigrants from Muslim countries arrived in Europe to feed labour-hungry industries, there were no concerns about the challenge of cultural integration. The host societies and newcomers believed they would return to their homelands after a few years. However, over time Muslims formed a large group of religious and cultural minorities in Europe and the dominant majority began to fear a change in their cultural homogeneity (Heckmann, 2015, pp. 7-9). Thus, the slogan 'foreigners out' has not been forged due to the recent migration and refugee crisis. It is a replenishment of old hostility against immigrants. For example, at the beginning of the 20th century, Simmel wrote about strangers who were welcome in a host society but were not accepted as members. They were wanderers who came from a different culture, for example, foreign traders, and would return to their countries. Later, when migration patterns changed and strangers became people 'who come today and stay tomorrow', the host societies developed hostility (Simmel, 1908, p.1). Likewise, after a while, Muslims were no more welcome in Europe since they constituted a group of foreign people who came and decided to stay. Viewed separately, migrations naturally create a feeling of

¹² Countries where the majority of population is Muslim.

hostility in host societies, but in this case, the immigrants were Muslims with different cultural values, and all these factors together fuelled anti-immigrant Islamophobia in Europe.

It is noteworthy that similar to the Islamist terrorist attacks, migration has been an essential tool of manipulation in the hands of populist politicians to fan Islamophobic feelings of the Europeans. In 1995, Verena Stolcke wrote about anti-immigration and anti-Muslim policies in Europe, which were rationalised because the Muslim foreigners lacked 'our moral and cultural values' (Stolcke, 1995, p. 2). The false image of 'self' and 'other' encouraged by populist politics in Europe has always negatively influenced Muslim immigrants' cultural integration into host European societies. Stolcke argued that in the 1990s, it became a tradition of political parties in the nation-states to base their campaigns on the uniqueness of European culture, calling on Muslim immigrants to leave Europe. The slogan 'foreigners out' attracted ordinary citizens because people tend to live in homogeneous societies (Stolcke, 1995, p. 4).

A few years later, Cora Alexa Døving strengthened the assumptions of Stolcke by describing this anti-immigrant and anti-Muslim hysteria in Europe as an expression of the fear of a hostile takeover—'the weak immigrant became the strong Muslim' (Døving, 2010, p.60). According to Døving, Muslims collectively became a threat as they were people with different cultural traditions, in the perceptions of Europeans, who had a different morality and created in Europe an alternative social system (Døving, 2010, p. 63). In this sense, anti-immigration and anti-Islam sentiments are expressions of the fear of a hostile takeover which constitutes a political narrative in Europe. The 2015 refugee crisis further strengthened this tendency and kept anti-immigrant Islamophobia in scholarly discourse alive.

Though European anti-immigrant Islamophobia has existed since the late 20th century, the 2015 refugee crisis started a new phase of modern Islamophobia discourse. There was a marked increase in anti-immigrant Islamophobia in Eastern Europe, which Michał Buchowski called the 'new tide' of Islamophobia (Buchowski, 2017). East European societies, which harboured less hostility towards Tatars or Chechen immigrants after the 2015 refugee crisis, displayed open racism and xenophobia against Muslims thanks to a significant role played in it by media and populist politicians (Buchowski, 2020, pp. 73-74). However, such a show of antagonism in Eastern European societies emerged from nationalism and Christian traditions as they do not share the principles of liberal-secularism. In the case of western Europe, the 2015 crisis indicated increased hate expressions against Islam and Muslims and a crisis of liberalism.

The European project of liberalism is to 'overcome differences between "them and "us" [...] and bring people and nations together' (Genova & Tazzioli, 2012, p. 35). However, according

to Abdelkader Engy, Europe entered a phase of great hypocrisy after the refugee crisis. In the name of liberalism, which should embrace multiculturalism and tolerance of cultural differences, European politics was directed towards the marginalisation of Muslim people living in Europe for allegedly disrespecting 'true' European values (Engy, 2017, p. 30). Furthermore, Jan-Warner Müller summarised the 2015 anti-Muslim and anti-immigrant hysteria in European liberal societies as liberal populism. In his book: *What is Populism*, Müller discussed the examples of left-wing and right-wing liberal parties such as SYRIZA in Greece, People's Party for Freedom and Democracy in the Netherlands, Sweden Democrats, which consider themselves loyal to European liberal values and have declared Islam a threat to 'Europeanness' (Müller, 2017, pp. 29-35). Though both authors agree on the previously discussed scholarly assumptions of Stolcke and Døving, they emphasise liberalism as a determinant of Europeanness. If earlier Muslims were portrayed as a threat to European Christian values, modern-day immigrants became enemies of European liberalism. The 2015 anti-immigrant and anti-Muslim hysteria proved that Europe betrayed its fundamental values and forgot that tolerating cultural differences was the cornerstone of liberal democracy.

The question that merits further discussion is why European liberalism based on pluralistic humanism lacks humanism in the case of Muslim immigrants who form a significant minority in Europe. In response to this, Farid Hafez pointed out the problem of European openness and true liberal values being in crisis. In fact, right-wing politicians, hiding behind the mask of liberalism, use Islamophobic rhetoric to denounce Muslim immigrants and accuse them of trying to take over or take down the West (Hafez, 2015). Compared to Hafez's assumption, Benjamin Opratko is more audacious while talking about liberal Islamophobia and pointing the finger at western liberals who play a crucial role in demonising Muslim immigrants. He argues that liberal politicians have forgotten what true liberalism is about. Instead of promoting cultural diversity and tolerance, they manipulate the terms—democracy, human rights or equality—on which they build their anti-Muslim rhetoric. They claim that Muslim culture is not familiar with these values and, therefore, Muslim immigrants, who carried their traditional values with them while migrating to Europe and stayed loyal to their culture, is a danger to the European 'us'. It is the modern liberals who blame Muslim cultural identities for undermining European cultural traditions and threatening the well-being of European societies (Opratko, 2019, p. 160-65). With this, anti-immigrant Islamophobia became a narrative of illiberal Muslim culture and a crisis of European liberalism.

In sum, the standard narrative of anti-immigrant Islamophobia is relatively old. In the 1990s, the immigration of culturally different Muslim groups was perceived as a danger to European cultural homogeneity. Later on, Islam became a threat to European liberalism. At the same time, the 2015 refugee crisis became a turning point in Islamophobia scholarship, when pundits started to discuss Islamophobia in the context of the crisis of liberalism. However, political populism is not the only ramification of the scholarly discussions about anti-immigrant Islamophobia. This discourse also covers the topic of Islamophobia in the European media and literature.

3.2.2. Islamophobia in the media and literature

In 2009, the interview of Thilo Sarrazin was published in the *Lettre International*, talking with racist enthusiasm about Turks and Arabs who lived in Berlin. He stated:

‘A large number of Turks and Arabs in this city, whose numbers have risen due to wrong politics, have no productive function besides food and vegetable trade and they won’t develop any other perspective other than this’ (Sarrazin, 2009, p. 198).

A primitive portrayal of Turks and Arabs by Sarrazin meant an indirect attack on Islam and Muslims, which he later openly depicted in his book *Hostile Takeover: How Islam Impedes Progress and Threatens Society* (Sarrazin, 2018). Likewise, some philosophers and writers, namely Michel Onfray, Douglas Murray, and Oriana Fallaci, advance the argument in their writings that Europe is in danger because of Islam and Muslims (Fallaci, 2002; Onfray, 2007; Murray, 2017). An illustration of literal conspiracy theories about Muslims, who allegedly carry out a holy war against Europe, is Fallaci's book *The Rage and the Pride*, where she called upon people in Europe to recognise Muslim hostility against western values:

'I say: Wake up, people, wake up! You don't understand, or don't want to understand, that what's under way here is a reverse crusade. [...] A war that they call Jihad. A Holy War. A war that doesn't want the conquest of our territories, perhaps, but certainly wants to conquer our souls. They will feel authorised to kill you and your children because you drink wine or beer, because you don't wear a long beard or a chador, because you go to the theatre and cinemas, because you listen to music and sing songs' (Fallaci, 2002, p. 47).

Though Fallaci and like-minded authors consider themselves critics of Islam and not Islamophobes, anti-Muslim prejudices and dehumanisation of Muslims constitute the main narrative in their books, have a significant impact on the / public. Experts on Islamophobia acknowledged the role of Islamophobic literature in forming public opinion against Muslims and Islam. According to John Esposito and Ibrahim Kalin, the literary works, which comprise anti-Muslim thinking, negatively influence society's popular consciousness and psyche. People begin to hate Muslims without personal reasons (Esposito & Kalin, 2011). Similarly, Peter Morrey asserts that literature does not simply reflect the world, but it plays a significant role in creating it; therefore, the literal personification of Muslims as dangerous, uncivilised people contributes to the emergence of social and cultural prejudices against them (Morrey, 2018). In this sense, anti-Muslim and anti-Islam literature represents Islamophobia, leading to greater evil—public hatred against Muslims. It has helped in the revitalisation of postcolonial orientalism and vindication of colonial racism in the 21st century. However, Islamophobic literature is not the only influencer of anti-Muslim sentiments. Whether a reader should read books of Sarrazin or Murray and accept their arguments about the Muslim danger constitutes an individual will, but what truly fuels the massive anti-Muslim hysteria in modern-day Europe is - contemporary media. In 2002, David Miller was writing about the unlimited power of media to influence public opinion:

‘What they exercise is the power to represent the world in certain definite ways. And because there are many different and conflicting ways in which the meaning about the world can be constructed, it matters profoundly what and who gets represented, who and what regularly and routinely gets left out; and how things, people, events, relationships are represented. What we know of society depends on how things are represented to us and that knowledge in turn informs what we do and what policies we are prepared to accept’ (Miller, 2002, p. 46).

Miller's description of powerful media is in line with how some TV channels and journals portrayed Muslims in Europe. They constructed the image of Muslims in such a way that it fuelled the phenomenon of Islamophobia. Contemporary scholars addressed this problem and assumed that Islamophobic media became a threat to the stability of multicultural Europe. According to Mohammed Umer, news headlines and newspapers link Muslims and Islam with violence, uncivilised activities, and extremism almost every day. Following this, in recent times, the term Islamophobia acquired a tremendous socio-political significance in Europe. By inciting Islamophobia and perpetuating stereotypes about Muslims, the media turned into a

propaganda machine spreading anti-Muslim hatred (Umer, 2018, p.2). However, mainstream media became hostile against Muslims after the Islamist terrorist attacks. In this regard, Chris Allen argued that the virulent portrayal of Muslims in media after the Islamist terrorist attacks of 2001 provided an impetus to Islamophobia. There was 'accessible and indiscriminate disseminator' of anti-Muslim sentiments through media coverage, in which Muslims were deemed as a danger to the West (Allen, 2001, p.2). Years later, in 2015, regular media coverage shocked people by showing them columns of Muslim immigrants coming into Europe. The sight was disturbing, and even those who had never met a single Muslim before in their remote villages began to hate and fear Muslims. Eventually, the stereotypes created through the media at the time of Muslim terrorism and later on, during the migration crisis affected the course of academic debates on Islamophobia. According to Amir Saeed, misrepresentation of Muslims in the media portrayed them as 'alien other'. They have not been treated as people subscribing to a different religion; Europe has a fundamental human right to have a religion other than the one that the majority belongs to. Muslims were culturally racialised following the media portrayal of Islam as a cultural perversion. As a result, modern scholars had to reopen postcolonial discussions about orientalism and the cultural 'other' to address the recent developments. The modern discourse of Islamophobia exceeded the debates on religious discrimination and acquired the context of cultural racism (Saeed, 2007). Furthermore, Halim Rane and his co-authors argued that how the media depicted Muslims and Islam revitalised Samuel Huntington's 20th-century theory about the clash of civilisations (Rane et al., 2014). Huntington characterised Islam as another civilisation different from western civilisation and stated that they conflicted with each other. Since cultural differences are not easily resolved, and people tend to be divided into 'us' and 'them', a confrontation between Muslims and the people of Europe is irreversible (Huntington, 1993, p. 60). Rane and his co-authors state that the media discuss the Muslim issue in Europe in the context of conflicting civilisations, amongst which the West is the more developed one, and Muslims are representatives of cultural values that endanger the heritage of European civilisation (Rane et al., 2014). The previous factors of Islamophobia have parallels in the narratives of media propaganda. Both argue on similar lines. The media nurture the prejudicial view that Muslims strive to defeat the West and destroy western civilisation.

Finally, the study of Islamophobia from its origins to its continuity in modern times overlaps various topics such as the Holy Wars, colonialism, Islamist terrorism and migration. In the last decade, the course of debates on Islamophobia has slightly changed as scholars started to focus on the intervening factors, such as the role of the media and literature in the formation of public

opinion against Muslims. The anti-Muslim media and literature fed the flames of Islamophobia in Europe. They propagated the idea that Muslims were the dangerous, primitive 'other' coming to conquer Europe. Eventually, these factors and the historical aspects of Islamophobia illustrate a very complex phenomenon. It is pretty challenging to define all forms and manifestations of Islamophobia in ordinary life and to distinguish between what constitutes anti-Muslim racism, anti-Islam bigotry and what does not. So, this introduces the next topic for the discussion: a working definition of Islamophobia.

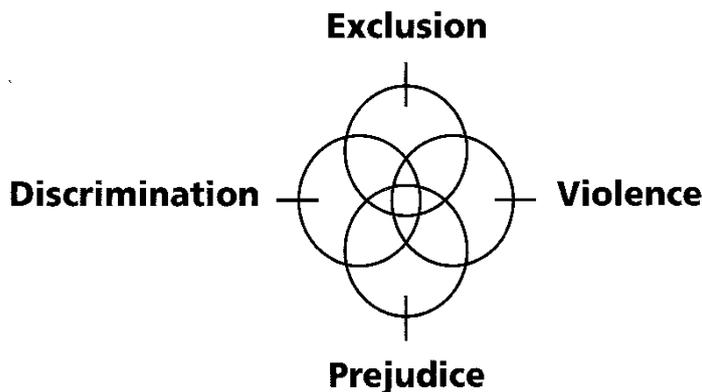
3.3. A working definition of Islamophobia

Scholarly debates on the origins of Islamophobia and attempted conceptualisation have their intellectual values, but responding to this challenge in the manner of policy requires a working definition of Islamophobia. According to Bleich: 'Developing Islamophobia as a concrete and usable social scientific concept is not only the basis for meaningful comparative and causal analysis in academia, it is also the foundation for more informed public debates and for more effective policy decisions' (Bleich 2012, 185). To borrow the words of Allen: 'In order to begin to address the problem of Islamophobia, there must be clarity and consensus about what Islamophobia actually is' (Allen 2020, 2). Adopting a working definition of Islamophobia goes beyond conceptualisation and names its particular forms of manifestation.

This dissertation shared multiple conceptualisations of Islamophobia suggested by different scholars and chose to deploy a generic definition of Islamophobia as hostility and fear against Muslims and Islam, which leads to numerous forms of Islamophobic manifestations. Nevertheless, this is a broad and imprecise definition. In practical terms, it is complicated to name what constitutes Islamophobia and what does not.

In 2014, Sayyid wrote an article, *A Measure of Islamophobia*, where he advanced the need to bring various expressions of anti-Muslim and anti-Islam hostility to light. He stated that 'the repertoire of Islamophobia' is more specific than hostility and hatred (Sayyid, 2014, p.15). Sayyid named five categories of activities described as Islamophobia, such as physical violence towards Muslims or individuals perceived as Muslims, their discrimination, as well as intimidation by demonstrations or campaigns warning about the danger of Islam; attacks on the property linked to Muslims, disparaging Muslims or Islam (Sayyid, 2014, pp.15-16)

However, much earlier, in 1997, the Runnymede Trust named four main aspects of Islamophobia: First, exclusion of Muslims from politics, government, employment, management and other responsibilities; second, discrimination of Muslims in employment, health and education services; third, prejudice about Muslims and Islam in media and everyday conversation; fourth, violence against Muslims in forms of physical abuse, verbal abuse and vandalising property (Runnymede Trust, 1997, p. 11). The Runnymede commission suggested the following visual summary of those components:



Note: Runnymede Trust, 1997, p. 12

The repertoire of Islamophobia is unexhaustive, but adopting a working definition is a way to achieve its practical understanding instead of vague conceptualisation. However, the central dilemma about the working definition of Islamophobia raises around the aspects of racism and anti-Islam bigotry. There is a tendency to approach Islamophobia as racism, which does not list the bigotry of Islam amongst the forms of its manifestation. Some call it a criticism of Islam and a free speech; others consider that hateful denouncement and disparagement of Islam is bigotry and cannot receive the name of criticism (Byrd, 2017, p.47; Larsson & Sanders, 2015, p.14).

In modern Europe, there are many incidents of abusing Muslim religious feelings in speech or by caricature, and this type of action enjoy protection under the freedom of speech (Madood, et al, 2006). It caused outrage amongst Muslim communities when film director Theo van Gogh referred to Muslims as 'goat fuckers', but others considered this free speech (Van der Veer, 2006, p. 111). In 2015, for example, Europe was shaken by the terrorist killings of Charlie Hebdo journalists. The satirical journal famous for its caricatures of politicians and religious leaders published content that negatively portrayed Muhamad and the Quran. The *Je suis Charlie* (I am Charlie) movement did not consider such publications as Islamophobic and marched to protect the right of free speech. However, Muslim communities and critics of the

Je suis Charlie movement considered this type of portrayal of Muhamad and the Quran abusive and Islamophobic (Mondon & Winter, 2017; Trench, 2016). Following this, some may call specific actions abusive to Muslim religious feelings or limiting their cultural freedom, but others do not. In 1988, for example, Salman Rushdie published his book, *Satanic Verses*, in Great Britain and received many positive reviews, but some Muslims accused the author of mocking Islam and their faith (Trousdale, 2017, p.340). In line with this, dissensions also exist around the topic of banning religious symbols. While it is a constitutional tradition of secularism to enforce such a ban, some may consider it an illustration of institutional Islamophobia and bigotry of Islam (Lyon & Spini, 2004, pp. 339-40).

it is complicated to define Islamophobia in a way that is acceptable for all interested parties. There is no universal method to establish boundaries between what constitutes Islamophobia and what does not; or how to tackle disparaging Islam and Muslims without censorship of free speech (Imhoff & Recker, 2012, pp. 817-19). In response, Heyder and Eisentraut suggest differentiation between anti-Islam bigotry, anti-Muslim racism and criticism of Islam based on prejudice (Heyder & Eisentraut, 2016, p. 180). In this sense, one could argue over a particular obsolete tradition of Islam, and it would constitute religious criticism, but if the narrative contains prejudice about Muslims and Islam, then it is Islamophobia. Miriam Elman describes it as conceptual stretching when Islamophobia or anti-Islam prejudices are applied to cases for which they are not appropriate (Elman, 2019). She argues that anti-Islam criticism in Western societies should not be misidentified as hostility against Islam because it is a secular criticism of particular religious practices. Similarly, Roland Imhoff and Julia Recker hold that secular criticism of Muslim religious practices should not be prevented because its proponents emphasise the factual reality that extreme devotion to the religion does not allow individuals to accept secularist values (Imhoff & Recker, 2012). The issue of drawing a boundary between Islamophobia and what goes beyond it was suggested by Abdoolkarim Vakil in his article: *Is the Islam in Islamophobia the same as the Islam in anti-Islam; or, when is it Islamophobia time?* (Vakil, 2010). Vakil argues that the final assessment of anti-Islam bigotry and the criticism of Islam should be based on the language and semantics of how Islam and Muslims are portrayed. If Islam is denounced as a religion of evil and people who belong to this religion are stigmatised as inferiors or primitives, then such assumptions are not relevant for rational criticism and they constitute Islamophobia (Vakil, 2010, pp.24-25).

Despite the scholarly suggestions mentioned above, the authors of working definition of Islamophobia chose the racial approach and built the definition entirely around Muslims,

neglecting the aspect of anti-Islam bigotry. For illustration, Imran Awan and Irene Zempi suggested following definition:

‘A fear, prejudice and hatred of Muslims or non-Muslim individuals that leads to provocation, hostility and intolerance by means of threatening, harassment, abuse, incitement and intimidation of Muslims and non-Muslims, both in the online and offline world. Motivated by institutional, ideological, political and religious hostility that transcends into structural and cultural racism which targets the symbols and markers of a being a Muslim’ (Awan & Zempi, 2020, p.2)

Interestingly, in 2016 the Muslim NGOs came up with the working definition of Islamophobia, which also supports the understanding of Islamophobia as racism. They stated:

‘We understand Islamophobia as a specific form of racism, that refers to acts of violence and discrimination, as well as racist speech, fuelled by historical abuses and negative stereotyping, and leading to exclusion and dehumanising of Muslims, and all those perceived as such’.¹³

A tendency to define Islamophobia as racism seems acceptable for certain Muslim civil society actors, but it cannot become a shared idea amongst scholars, who insist that Islamophobia goes beyond racism. Above mentioned formulations do not acknowledge the aspect of anti-Islam bigotry. It lacks an emphasis that Muslims experience hatred in everyday life because they belong to Islam. A decisive factor in understanding Islamophobia is hostility against Islam, and if this component is not named, then the term Islamophobia becomes invalid. It could be replaced by the term anti-Muslim racism. Arguably, the working definition of Islamophobia should stand close to its conceptual understanding, which considers the aspect of anti-Islam bigotry.

3.3.1. A few words about understanding Islamophobia as anti-Muslim racism and anti-Islam bigotry

The conceptualisation of the term Islamophobia indicates that anti-Muslim racism and anti-Islam bigotry are the two main interconnected categories of Islamophobia. At the centre of the

¹³ The document has been obtained in personal communication through Email with Bashy Quraishi, the director of European Muslim Initiative for Social Cohesion (EMISCO), on 2nd August 2021.

racism theory is race or a notion regarding it, which has nothing to do with a biological race in humans but refers to a socially constructed belief about distinct groups of people based on their physical and cultural traits (Morning, 2011, p. 37). The contemporary racism or new racism, as Abbas called it, does not emphasise biologically ascribed distinctions and is constructed around cultural and social markers, such as language, religion, immigrant status (Abbas, 2004, p.30). According to Blaut, over time, various arguments have developed in racist theories. Until the mid-nineteenth century, the dominant racist theory was a biblical one based on religion. Later, from 1850 to 1950, a biological argument was advanced based on natural science. Now, the modern racist theory refers mainly to historical aspects built on the idea of culture. He stated that 'today's racism is cultural racism' (Blaut, 1992, p. 290). From this perspective, the hostility against Muslims, their discrimination and negative prejudices about them constitutes a racial form of Islamophobia. As mentioned earlier, the dehumanisation of Muslims by the Pope in the 11th century could be considered as a manifestation of religious racism, though, obviously, such a term did not exist in medieval times. Later, colonial attitudes towards Muslims were a form of cultural racism. Moreover, in present times, Muslims are also victims of humiliation, which constitutes a combination of cultural and religious racism against them. However, according to Ana Sophie Lauwers, anti-Muslim racism is more complicated phenomenon than the mere mocking of individuals. The negative characteristics of Islam are ingrained in Muslims, and, hence, they cannot change (Lauwers, 2019). Sayyid has described this as the racialisation of religion to discriminate against Muslims (Sayyid, 2014). In this sense, the conspiracy theories about bad Muslims coming to Europe to endanger European well-being and cultural advancement contain a racial narrative suggesting Muslims are culturally backward and dangerous. Arguably, the writings of self-proclaimed critics of Islam such as Sarrazin, Fallaci, Onfray and Murray are committed to racialising Muslims. However, their writings do contain anti-Islam bigotry. Based on the theory suggested by Heyder and Eisentraut, prejudices or stereotypes about Muslims and their cultural or religious backwardness constitutes the bigotry of Islam primarily, and it cannot be justified as criticism or freedom of speech (Heyder & Eisentraut, 2016). The bottom line of such an assessment is that the narrative which incites hatred and hostility against Muslims also denounces the religion of Islam. Therefore, Islamophobia goes beyond racism and constitutes anti-Islam bigotry, which plays a significant role in understanding the so-called phenomenon.

At the centre of the anti-Islam bigotry is antagonism against the Islamist identity markers and the prejudice that Islam is a source of evil. Talal Asad has argued that to see Islam as a quasi-civilisation or quasi-culture that can never be embraced by Europe, as it allegedly runs

counter to a civilised way of life, constitutes bigotry. He referred to this factor to explain the secular antagonism against Islam in Europe, where Muslims are forced to remove their religious identity markers and show devotion to European secularism (Asad, 2003, p. 16). Hence, any attack on Muslims is an attack on Islam. Anti-Muslim racism does not exist apart from the anti-Islam bigotry.

It is significant to acknowledge that the biased motivation to discriminate or exclude Muslims in European societies is the antagonism against the culture and religion of Islam. Some may wonder why not all Muslims are the victims of abuse. Anatolian dentists or respectful doctors from Palestine often deny ever being the victims of Islamophobia in Europe, while other Muslims are called offensive names or Muslim women are attacked on the ground of wearing a headscarf. It would be misleading to assume that some Muslims are tolerated in Europe and some are not. In fact, not all Muslims wear identity markers that manifest their belonging to Islam. A crucial point in this approach is that Muslims are safe if their 'Muslimness' is not detected. An example of this is a story about a Muslim patient undergoing treatment at a hospital in Italy, as told by Gabriele Marranci in his article *Multiculturalism, Islam and the clash of civilisations theory: rethinking Islamophobia* (Marranci, 2004). When a Muslim man was hospitalised, patients started to warn each other about a 'dangerous' Muslim among them. Ironically, they could not identify this person, so even the Muslim patient was told to be careful and not talk to that Muslim man. He was an accepted member of the patients' group at the hospital as long as no one had a clue of his identity. The story has the following ending: Once he revealed his name, all patients stopped interacting with him (Marranci, 2004, p. 110). This shows that if Muslims pretend to be like others and disguise their true identity, they do not necessarily face a threat of Islamophobia.

Thus, from the perspective of human rights violations against Muslims, such as their discrimination and exclusion, Islamophobia constitutes racism. However, those acts of hostility are unlikely to occur, if not the inherent fear and bigotry against Islam. Therefore, omitting the latter suggests an incomplete definition of Islamophobia. It also sophisticates the understanding of Muslims' cultural othering.

3.4. Muslims as the cultural ‘other’ and a crisis of multiculturalism policies

An analysis of scholarly works regarding the various discourses on Islamophobia debates led to various theories about its origins, modern trends, and definitions. A common scholarly approach to these topics does not exist. However, considering the historical past and modern Islamophobic realities in Europe, it could be pointed out by way of deduction in the literature review that there is a certain degree of consensus in the Islamophobia studies regarding the portrayal of Muslims as the cultural ‘other’ of Europe that poses a challenge to European multiculturalism.

According to Ralph Grillo, the term cultural 'other' implies being culturally different and a 'primitive' group of people in the perception of the cultural majority, with the label being applied as a result of categorisation in a multicultural society (Grillo, 2003). This explains the modern cultural discourse in Europe, which has never been homogenous, but representatives of the dominant European culture refuse to accept that, in Europe, there should exist different cultural identities other than the imagined European one. Hence, cultural minorities have been victimised and stigmatised as the cultural 'other'. At different times, the label of cultural 'other' of Europe, indicating a distinct and inferior cultural identity, has been carried by Jews, Roma minorities, and now by Muslims (Schiffauer, 2013). The cultural otherness of Muslims creates a problem concerning their Muslimness and constitutes the cornerstone of European Islamophobia. It becomes a ground for their repulsion and denouncement by the dominant cultural group. Labelling Muslims as the cultural 'other' frames them as the inner enemies of Europe who are to blame for all social, economic, and even demographic perplexities. This leads to prejudice about the 'secret Islamization' of Europe, indicating a symbolic threat of Islam and Muslims (Uenal, 2016). Following this, the cultural 'othering' of Muslims contains three main prejudicial components: cultural alterity, cultural backwardness, and Muslim takeover. Raphael Israeli has dramatically described all these components to illustrate that Muslims are the cultural and primitive other of Europe, standing on the wrong side of the dichotomy:

'Two worlds apart, separated by an unbridgeable cultural gap: one modern, open, tolerant, advanced, meaning well, law abiding, democratic, orderly, eager to live and to let live, oriented to progress and the future, accepting and self-confident to the point of running the risk of self-destruction by generously allowing into itself Muslim elements bent on altering, terrorising and destroying it; the other narrow-minded, bigoted, jealous, backward, lawless, bent on restoring past glory, intolerant of other and other ideas, tyrannical in rule, unable to accept and include, suspicious and fearing plots, taking

shadows of things as the things themselves, vengeful and vindictive, prone to humiliation and shunning exposure to shame, and ready to waive its own life and to take down with it its western enemy' (Israeli, 2008, p. 224).

However, such a portrayal of Muslims and their labelling does not pin the fact that the problem lies in cultural differences of Muslims but points to the disposition of the dominant cultural group, which cannot tolerate and embrace different cultural identities. The perception of otherness is a complex phenomenon that has been studied in different contexts. For Instance, Susan Andersen and her fellow researchers studied the activation of such perceptions in the individual towards another person or a group of people using experimental methods. The research revealed that in everyday life, individuals live with the social perceptions that another person, who is not a member of their family, community or nation, is being categorised as the 'other' at different times and in various contexts (Andersen et al. 1995). This means, an individual having the same nationality as others, is considered an insider at the country level, but, at the community level, he/she becomes an outsider due to belonging to another city or village. If the measure is family, representing a small group of people, then everyone else who is not a family member automatically becomes the 'other'. The indicator of otherness is not always whether the individual or a group share the same values as another person or group. Within a family or a village, people may possess different values, but they are identified as members of the same group because of the perception that this is where they belong to. In the discourse on cultural otherness, the dominant argument is that different cultural values that become a problem when culturally different groups come to live together. In fact, the problem is a perception that those cultural identities do not belong together in the same special group.

Attitudes towards cultural alterity, which form the sociological and anthropological phenomenon of 'stranger', are as old as humanity itself. As described by George Simmel, a stranger is a potential cultural 'other', whose position is determined by the fact that he or she does not belong to the group and can import qualities that are not traditional for the group members (Simmel, 1908, p. 2). For instance, merchants who came to Europe for trade were strangers, as they did not own land there. However, when a stranger becomes a cultural 'other', it constitutes a rather different form of interaction. The individual or a group of individuals is not a stranger anymore, but their cultural values are different, which could be acknowledged by the host society when strangers settle down and start to pursue their traditional way of living. The host society becomes hostile towards them because strangers do not commit themselves to the familiar traditions and customs of the dominant culture. So, the stranger becomes a cultural

'other' and the 'inner enemy', who could be blamed for every failure the dominant cultural group experiences for different reasons (Simmel, 1908, p. 2). An example of Simmel's theory finds its illustration in the history of Muslim immigrants in Europe. When Muslims came as labour migrants to Europe and were planning to return to their countries of origin after a while, there was no widespread hostility towards them. When they settled down in Europe and did not aim to return, the attitudes in the hosting societies changed against them. They were strangers at first, but gradually Muslims started forming a cultural minority in Europe, and so they became the cultural 'others', the inner enemies, who threatened European culture with their own 'primitive' traditions. Just as Jews in Germany were blamed for everything before and during the Second World War, now Muslims have become modern-time enemies of Europe. For instance, Stolcke referred to the propensity of people in Europe to blame Muslim immigrants for all socio-economic problems such as unemployment, housing shortage, just because they are people of different moral and cultural values (Stolcke, 1995, p. 2). So, the problem of cultural otherness is not about different cultural values but a perception that if they are different, then they must be bad. As discussed earlier in the chapter on methodology, addressing the matter of Muslim and European cultural values, the cause of stigmatisation and negative labelling of Muslims is the European 'reverse mirror image' in the words of Gerd Baumann, which places Muslims not only on the other side of the dichotomy but also diabolises them (Bauman, 2004, p.18). From this perspective, it appears that the 'Muslim problem' in Europe is a challenge to multiculturalism. Some scholars even call it a fear of multiculturalism.

Marranci termed the European aspiration to have a mono-cultural Europe as a phobia of multiculturalism and attributed this fear to the European prejudice that embracing Islam could change the unique European cultural heritage (Marranci, 2004, p. 109). What Marranci described as fear of multiculturalism poses a challenge to living together with culturally diverse but equal people. It is embodied in the prejudicial fear of Islamization and a self-claimed European cultural superiority. According to Terrence Turner, multiculturalism seeks to accommodate different cultural identities within the same political and social system on an equal footing (Turner, 1993, p. 420). However, the fundamental problem is that Europeanness does not envisage other cultures and, especially the Muslim one, as equal. As Adam Kuper termed it, European societies consider their culture 'elite' or 'high' (Kuper, 1999, p.127). It seems impossible for Muslims to receive recognition in European societies as representatives of a peer culture because European culture is superior from the European point of view. In the theory of James M. Blaut, the European view of the world has always been as follows: The 'great Europe' is a permanent centre, a core of the world associated with advancement, innovation, and

progress. Apart from Europe and the West, there is a periphery of uncultured, undeveloped groups of people, including Muslims, on whom Europeans spread their cultural traits and innovations. Otherwise, non-Europeans do not possess the same qualities of mind and spirit that are only peculiar to Europeanness (Blaut, 1992, p. 290). Following this, the rejection of Muslims and Islam is, in a sense, also the crisis of multiculturalism policy. The fundamental principle of cultural equality becomes incompatible with the European cultural hegemony and undermines a multicultural way of Muslim cultural integration unless European policymakers were to find a way to make it happen.

Thus, in the context of European cultural hegemony, the space for a fully-fledged multiculturalism policy is limited. In the absence of cultural equality, European Muslims remain a group of cultural 'other'. So, they are doomed to suffer social exclusion and stigmatisation, as they remain loyal to their Muslim customs and traditions. With this in mind, labelling Muslims the cultural 'others', undermining multiculturalism principle, and the dilemma of Muslim cultural integration are interconnected with the European cultural consciousness. Changing the Islamophobic reality of Europe and embracing multiculturalism depends on altering the pattern of 'selfing' and 'othering'. Moreover, the question is whether a historic self-image is alterable or how the label of the cultural 'other' could be removed.

3.4.1. Shifting the label of cultural 'other'

If the European pattern of 'selfing' and 'othering' is the source of the 'Muslim problem' in Europe, there are limited options of evoking a change. Either Europeans should start 'selfing' themselves as equal to any other cultural group and embrace cultural differences, or Muslims should Europeanise, acculturate, and assimilate (Relevy, 2015). With this logic, as a third option, the European societies could also acknowledge the cultural superiority of others. However, such an alteration of European cultural consciousness seems very unlikely. The theories worked out in cultural memory studies indicate that societies or nations may forget certain customs and traditions, but they transmit from generation to generation the cultural remembrance that defines their exclusiveness (Rigney, 2018). The previously discussed theories of colonialism, cultural racism, and European self-reliance being at the cultural centre of the world point out that, in the self-conception, the European cultural history is too old and too great to recognise any other culture as its peer (Ferguson, 2011; Goldstone, 2008).

Furthermore, Sayyid has argued that the European identity and the idea of Europeanness formed within the postcolonial context along with Orientalism, and, though the eastern and central European visions of European cultural identity are different from the western point of view, the idea of a European identity for the whole of Europe rests upon the belief that Europeans are higher in the hierarchy than Muslims (Sayyid, 2018, p. 421). So, European nations, united by the idea of European cultural greatness, are reluctant to embrace another cultural identity that they envisage as inferior. Then it becomes a challenge for Muslim immigrants to make themselves acceptable in European societies as equal individuals by becoming like Europeans.

Whether the cultural 'other' can ever free themselves from this label or Muslims can Europeanise themselves has been explained in the theories of identity formation and identity policies. Though, the concept of identity is very complex, Zagorka Golubović explained it simply and suggested that identity refers to the individual or group belonging expressed as a self-image or common image. The common image integrates people in self or group existence and differentiates them from others (Golubović, 2011, p. 26). Following this, alteration of cultural belonging depends on whether cultural identity can be constructed.

An illustration of constructed identities is Erik Erikson's approach, which states that children are not born with identities, but develop them with time to acquire different social roles (Erikson, 1968). On the contrary, Anthony Giddens writes about traditional identities, such as a national or an ethnic belonging, transmitted by birth (Giddens, 1991). Perhaps, an individual is born as Turk or Arab by ethnicity, but considering Erikson's theory, people are not born as Muslims or Europeans. Over time individuals acquire the knowledge of cultural values, traditions, and customs, which they start to follow and which influence their thinking and behaviour. This is how people start identifying themselves as part of a particular culture. At this point, cultural identities, as long as they refer to the self-image, could be constructed. However, belonging to a particular group is a two-part process, which means that an individual identifies him/herself with the group of people, but the group accepts the individual as one of them (Melluci, 1995, pp. 43-45). It is crucial in constructing a shared cultural identity that the cultural group recognises the sameness and accepts the individual. Accordingly, one may consider him/herself a European, but other Europeans should also recognise the person as one; otherwise, the identity construction is not complete. For example, Muslims residing in Europe may consider themselves Europeans, but the problem is that most people in Europe do not accept their Europeanness.

So, an individual cultural identity could be constructed, but the process is slightly difficult in the collective dimension because the individual self-image does not guarantee that the other members of the cultural group would recognise it. In other words, one can construct a self-image, but when it comes to the collective identity, the primordiality prevails. Benedict Anderson and Stuart Hall wrote that collective identities are shaped by shared histories, shared languages, and shared religious traditions. These constitute the cultural identity of a particular group. It is one shared culture, 'a sort of collective "one true self" hiding inside the many other', which hold in common a shared history and ancestry (Anderson, 1983; Hall, 1994). Hence, Muslims may learn the language and values of the host European society, but the absence of the same religious identity and a shared history and ancestry with Europeans dooms them to remain the cultural 'other'. Even secular Muslims, who do not follow Muslim religious practice, are unlikely to be considered peer Europeans because their 'primordial' cultural history is perceived as different.

Another problem in removing the cultural otherness of Muslims is the peculiarity of imposed identity. The dilemma concerning the Muslim question implies their cultural differences and the reverse-mirror image of the Orient in the eyes of the Occident. For instance, some scholars such as Claire Adida, David Laitin and Marie-Anne Valfort explained that the perceptions about Muslimness are so negative that no one expects Muslims to become 'secular' or as 'civilised' Europeans. The people of Europe are convinced that primitiveness is encoded in Muslims, which cannot be changed (Adida, Laitin & Valfort, 2016, p. 9). Likewise, Justine Vaise also referred to the myth that being Muslim constitutes a fixed, permanent identity, which is sufficient to fully characterise a person as uncivilised and a threat to western civilisation (Vaise, 2008, p. 1). In this sense, the European perception of the Muslim cultural otherness expressed in Orientalism and racialisation rests upon the assumption that the Muslim cultural identity is not alterable. However, those assumptions have very little to share with the anthropological debates regarding identity construction. In fact, this is a question of identity policy. Imposed Muslim identities mean that their key identity markers are stereotypes, which describes how the Occident sees the Orient, overlooking their actual cultural practices. So, removing the label of cultural 'other' does not depend on Muslims but on the host European societies that imposed it. Then, it may be pertinent to ask, why do they insist on the assimilation of Muslims in European societies?

An answer can be found in Werner Schiffauer's article, who built his discussion about accepting otherness on the logic of tolerance (Schiffauer, 2013). Tolerance forms the centre of

humanistic pluralism, but Schiffauer argued that toleration had boundaries, too. Differences exist, but not all of them make a difference, and they become routine. What is normal falls within the domain of acceptance (e.g., in modern Europe it is freedom of religion). Unlike this, some differences should be tolerated but are not (e.g., wearing religious symbols). Some fall within a third category, which means they should not, cannot, and are not tolerated (e.g. arranged marriages). If we place Muslim cultural and religious features on the European spectrum of toleration, the presence of Islam in Europe becomes non-tolerable (Schiffauer, 2013, pp. 110-111). From this perspective, if Muslims reconstruct their cultural alterity so that they stop practising certain religious or cultural traditions, they will become tolerable. However, the condition of toleration, which urges Muslims to sacrifice their Muslimness, is very undemocratic and pointless, too, since toleration does not change the dichotomy of cultural otherness.

In the value-oriented polarisation, Muslims do not have a chance to pass as Europeans by their own endeavours and avoid marginalisation. The reason is not a fixed cultural identity but a lack of will among Europeans to remove the stereotypes they have stuck on Muslims. Simply, even if Muslims give up their traditional beliefs and customs and put up with the European values, they will remain the cultural 'other' for Europeans because they were born Muslims and their forefathers were Muslims.

Thus, if Muslims cannot free themselves from the label of cultural 'other' on their own and the cultural pride of Europeans does not allow minority culture to be considered as equal, then where does hope lie? What could become the backbone of protecting multiculturalism and cultural equality in Europe? These are questions that bring up the factor of proper political approach and the role of the EU. As Lindo explained, a perception of cultural integration as a self-evident two-party process may lead to the problem, but when a policy comes into interplay, it changes the path of integration and may lead to the desirable outcome (Lindo, 2005, p. 7).

In research on otherness by Andersen and her colleagues, there is a dimension in which the 'other' is not the 'other' anymore (Adersen et al., 1995). For example, a neighbour is 'other', because of non-family membership, but even the neighbour becomes an insider in terms of neighbourhood. So, a way to remove the label of cultural other from Muslims and embrace them depends on the common bond between the two cultural groups at supra-cultural and supra-religious levels, which implies the multicultural principle of equal citizenship of the EU (Raja, 2012). However, establishing such a bond is impossible in a natural state of cultural integration in a two-part process in which the host society is unwilling to embrace immigrant culture and

immigrants deny assimilation. Therefore, this dissertation envisages cultural integration as a process consisting of multiple parties, including governments and supranational organisations, like the EU. They have the power to influence the process of 'selfing' and 'othering' and advance the principle of equal citizenship, which stands above cultural differences and stereotypes about otherness. Whether the EU addresses the 'Muslim problem' from this perspective is the subject of this study. It is, therefore, a reasonable objective of this dissertation to examine the EU's policy approach towards the cultural integration of European Muslims and combating Islamophobia.

In sum, the primordial character of European identity implies a prejudice that one should be born European. From this perspective, it is believed that Muslim-born individuals are so culturally inferior that it is impossible for them ever to become true Europeans. Of course, this is an identity imposed on Muslims. The idea of cultural otherness rests on how the dominant cultural group perceives them and not on the self-identification of individual Muslims. In the antagonism between Europeanness and Muslimness, Muslims will always have the label of the cultural other. So, influencing the perceptions of cultural otherness in Europe and letting European multiculturalism consider Muslim culture becomes a challenge concerning a uniform cultural integration policy at the EU level. However, posing the Muslim question in the policy context of the EU is an emerging ramification in modern scholarship, and it lacks analytical comprehension.

3.5. Scholarly reference to the Muslim question in the context of the EU policy

In recent years scholars and civil organisations have demonstrated increased interest to demand more support from the EU towards Muslim communities. A platform of anti-racist, human rights and faith-based NGOs, which united in combatting anti-Muslim discrimination and hatred, appealed to the EU to get serious about including Muslims in the European societies and tackling Islamophobia. In their opinion, to fight against unfair discrimination of Muslims, hatred and Islamophobic rhetoric requires strong political will and effectively coordinated actions, which is not yet evident at the EU institutional level (European Network Against Racism, 2018). In the recommendations to the EU, the civil organisations stated that the EU should recognise Islamophobia as a category of racism and support Member States to adopt a national action plan against it (European Network Against Racism, 2019). However, addressing

Islamophobia as a racial category is a contested question. Mentioned in the previous discussion about the working definition of Islamophobia, there is a group of scholars who argue that the manifestation of Islamophobia bears resemblance with racism, but disparaging Islam and religious bigotry goes beyond it (Allen, 2010; Bleich, 2012; Lauwers, 2019; Sayyid, 2014). In this sense, not naming Islamophobia or recognising it as a category of racism are both problematic. On the other hand, it is critical to argue that what the EU does or does not is insufficient, whereas there is a lack of scholarly consensus about the concept of Islamophobia. Nevertheless, the theoretical knowledge generated over the decades facilitates recognising Islamophobia as a valid category and recorded cases of Islamophobic incidents lay grounds to raise the alarm over this challenging threat.

It is interesting to note that before civil organisations started to call upon the EU for more significant commitment against Islamophobia, some scholars have raised this question years earlier. In 2004 Allen published the article *Justifying Islamophobia*, where he made a slight reference to the approach of the EU towards post 9/11 Islamophobia (Allen, 2004). He argued that before the Islamist terrorism of 9/11, the United Nations (UN) declared Islamophobia officially as a discriminatory phenomenon being equally dangerous as anti-Semitism. However, the EU disregarded this recognition and started to focus on this challenge as anti-Muslim hatred and discrimination increased after Islamist terrorism, which coined Islamophobia as a rational or justifiable reaction of European societies to the Islamist killings. Allen considered such a contextualisation of Islamophobia by the EU as making this phenomenon acceptable (Allen, 2004, p. 1). Unlike Allen, other scholars did not accuse the EU of normalising Islamophobia, but they emphasised the negligent approach of the EU towards this challenging threat. Matti Bunzl made thoughts about the new Europe in the times of anti-Semitism and Islamophobia and criticised the EU for the nominal commitment towards protecting the Muslim communities (Bunzl, 2005). He argued that the EU is worried more about the migration flows from the Islamic world than about the most violent manifestation of Islamophobia in European societies. Bunzl also referred to Turkey's membership in the EU and called it 'the most crucial aspect of Islamophobia' as radicalisation against Muslims in Europe started over this topic (Bunzl, 2005, p. 505).

Consequently, he advised the EU to acknowledge the Muslim presence in European societies and to make concerns about the future of Europe (Bunzl, 2005, p. 505). Similarly, Paul Weller denoted that the EU does not take this challenge seriously despite religious discrimination against Muslims and the dangerous reality of Islamophobia. It lacks a legal mechanism to

protect Muslims against 'such a scale of danger' in democratic European societies (Weller, 2006, p.322). He argued that a single piece of law prohibiting religious discrimination at the Community level is the Employment Equality Directive adopted by the EU. However, it has a limited scope and does not suggest the remedy of religious discrimination against Muslims in the other field of social life. On the other hand, Islamophobia manifests in different ways and does not contain solely religious discrimination. Hence, in the opinion of Weller, it is recommendable to the EU to take a complex approach towards Islamophobia and reflect all specificity of it in the legal policy context (Weller, 2006, p 295).

Having said that, though at the beginning of the 2000s, Islamophobia was still an emerging concept in the political discourse and often implying imprecisely to the diverse phenomena of xenophobia, racism or post-9/11 attitudes towards Muslims (Cesari, 2011; Klug, 2012), scholars had a critical approach towards the lack of EU's commitment to combat Islamophobia. It has to be noted that the EU is an entity of a complex institutional body with complicated law-making procedures, which hampers a swift policy response to the problem (Wallace, 2021). Nevertheless, over two decades, the EU had enough time and opportunity to coin the concept of Islamophobia and to address this challenge in its policymaking. Some years have passed since Allen, Bunzl, or Weller expressed the critique of the EU over its reluctance to take the threat of Islamophobia seriously, but instead of moderating the criticism, it became sharper over time. In the modern scholarly discourse, there are diverse topics about the EU and its policy impact on Muslim communities that are critically approximated.

A significant question in the context of the EU policy is a constellation of secularism, multiculturalism and Islam. According to Tariq Modood and Riva Kastoryano, the inclusion of Muslims in European societies stands in the centre of European multiculturalism debates (Modood & Kastoryano, 2007). While eastern Europe is rather nationalist, the central and western parts of Europe are more secular, which is equally incontinent for accommodating Muslim cultural identities. Incidentally, in the opinion of Modood and Kastoryano, in the EU, all countries share certain features of secularism, which becomes a mechanism to oppress the cultural freedom of Muslims, but at the same time undermine the principle of multiculturalism. Therefore, the scholarly suggestion is for the EU to make commitments so that the Member States rethink the concept of secularism in favour of multicultural citizenship and recognise Muslim cultural identities (Modood & Kastoryano, 2007, p. 13). However, other scholars are more sceptic towards the role of the EU in accommodating Islam. For illustration, BarrieWharton argued that the establishment of the European Union and its striving for

European integration undermined Muslim cultural inclusion. The secular values of the EU, which embodies Judo-Christian heritage, facilitates the expulsion of Islamic 'other' and strengthens the prejudices about the Muslim archetype (Wharton, 2008). In line with it, Saira Khan called the reluctance of the EU to take swift actions against anti-Muslim discrimination and hatred an institutional aversion. She emphasised that the EU has been founded on promoting peace and human rights, but it fails to follow this intention by institutionalising secular values and, therefore, disregarding Muslim religious freedom (Khan, 2020). Furthermore, according to Raphaële Xenidis, the EU ignores specific configurations of manifesting Islamophobia on behalf of secularism. She referred to the legal dealings of the Court of Justice of the EU on anti-Muslim discrimination and argued that how Court addressed the claims of discrimination on the religious basis is not in compliance with the combat against Islamophobia (Xenidis, 2018).

Though the clash between secularism and Muslim religious traditions is an advanced topic in the scholarly discussions (Barbulescu & Andreescu, 2009; Freedman, 2004; Jansen, 2013), an allegation to the EU that it deploys secularism as a mechanism to limit Muslim religious freedom should rest upon the plausible argumentation. In the discussions suggested by Wharton, Khan and Xenidis, it has been taken for granted that the EU intentionally turns away from the question of anti-Muslim discrimination in the way that it institutionalises secularism (Khan, 2020; Wharton, 2008; Xenidis, 2018). In fact, this is a contested question. To argue that the EU disregards the problem of anti-Muslim discrimination and is instead committed to the principle of secularism requires a comprehensive study of the EU policy framework. Furthermore, a need for a higher academic argumentation standard does not exclude the rightfulness of the assumption that how the EU addresses the question of Muslim cultural identities in secular European societies harms ordinary people's lives. Nevertheless, the critical point of the scholarly endeavour to study the Muslim question in the EU policy context is convincing while arguing that what the EU does or not does has a deliberation to achieve specific policy outcomes. Therefore, it became a trend in modern scholarship to take a descriptive approach towards the EU policy regarding Muslims or to warn the EU about the increasing challenge of Islamophobia.

An intense topic is the integration policy of the EU, which affects European multiculturalism and coins the problem of Muslimness. Gustav Blomberg raised the question of whether EU policy on integration serves the purpose of multiculturalism or has an intention of assimilation. He analysed the Commission's Action Plan on the integration and assumed that it supports the

assimilative practice, which does not favour the traditional Muslim ways of life. He concluded that recent political developments in the EU promote the European way of life and not a multicultural Europe 'United in Diversity' (Blomberg, 2020, p. 92). This problem has been advanced much earlier by Thomas Hylland Eriksen, who argued that the EU urges immigrants to comply with the European values, which define European societies. The burden of integration lay on the people with migration backgrounds to fit in the host society's political system, education system, and labour market, but they cannot succeed unless they adopt the European way of life. Hence, Muslims or other immigrant groups with different cultural identities and traditions do not have a choice but to assimilate (Eriksen, 2006).

Similarly, Gertjan Dijkink wrote that multiculturalism failed in the EU, and like any other immigrants, Muslims also are required to conform to the values of the European societies, which brings their traditional identity into question. The EU and state institutions coerce immigrants and minorities to the belief system of western liberal culture, which means for Muslims to redefine their identity (Dijkink, 2006). On the contrary, modern scholars argue that it is not multiculturalism but the policy of multiculturalism that failed in the EU and failed because multiculturalism was not even attempted (Angeliki & Arvanitis, 2019, p. 15). According to Leo Lucassen, multiculturalism in the sense of cultural diversity cannot fail in the European migration regime. However, the policy of the EU and its Member States are oriented at overcoming cultural differences of various groups, including Muslims, to unify them in a common culture defined by European values, which indicates a political crisis of multiculturalism (Lucassen, 2019).

Scholarly descriptions of the EU policy towards immigrants pointed out the inclination towards cultural homogeneity in which Muslims have to re-identify themselves as Europeans. However, there are specific problems of argumentation in this respect. Does compliance with the European values of democracy and human rights endanger the Muslim cultural identities and the principle of multiculturalism? In the opinion of many, those rights that define Europeanness are at the same time the guarantee of protecting Muslim cultural and religious freedom (Göle, 2012; Meer, 2008; Peucker & Akbarzadeh, 2014). Hence, committing to the European values of universal human rights cannot become the ground of assimilation. Following this, a group of scholars initiated instead of a dichotomic context of multiculturalism and assimilation to advance interculturalism in the approximation of the EU integration policy.

According to Jordi-Jesús Muñoz, it is a fact that the EU is a culturally diverse space, so multiculturalism is a given reality, where people with different traditions, languages, religions

or ethnicities coexist together. However, managing multiculturalism is a different question. In his opinion, the EU chose an intercultural model of policy to address existing cultural diversity. This is a space of respect to different cultural identities but grants significance to the intercultural dialogue. Muñoz argued that such interculturalism rests upon a management model of equality, where political organisation and a legal structure is designed to ensure intercultural interaction and inclusion of culturally different groups like Muslims. Unlike the multicultural model of integration, which supports the idea of peaceful coexistence but not an interaction, according to Muñoz, the EU, with its intercultural model, has a purpose of passing the simple coexistence of different cultures and of enriching them through intercultural dialogue (Muñoz, 2017). In this context, there is a scholarly tendency to approve the intercultural policy choice of the EU. Some authors consider it meaningful that the EU governance of diversity transformed from assimilation to integration and from multiculturalism to interculturalism. The goal of the EU since 2000 is to facilitate a constructive dialogue between culturally different groups and ensure respectful cultural encounters. In scholarly opinion, the EU policy of interculturalism promotes understanding of differences and copes with a challenge of cultural diversification through intercultural dialogue. The ultimate goal of the EU policy is to strengthen social and cultural cohesion in an inclusive society, where no one becomes the victim of segregation and repulsion (Lähdesmäki et al., 2020, p. 19). Also, the Centre for European Policy Studies (CEPS) shared that the overall trend of the EU policymaking in the field of integration is oriented at interculturalism and aimed at a sound social model. The policy experts approximated it as an urgent step of compromise to promote intercultural dialogue and a reasonable solution for Muslims to feel a belonging to European societies and retain their cultural identities (Carrera et al., 2011, p. 8). In expert opinion, the EU policy choice of interculturalism is based on the mutual respect between immigrants and the host society. It ensures the non-discrimination of individuals based on their religion or ethnicity but also promotes inter-group relations and cultural exchange, so the cultural encounter does not become a ground of exclusion (Carrera et al., 2011, p. 8).

An argument that interculturalism is an optimal model for cultural integration and inclusion of European Muslims is widely accepted in cultural studies. This is a result of theoretical rethinking of multiculturalism to avoid passive multicultural coexistence and to establish a common link between culturally diverse groups that defines their common identity (Barrero, 2017; Booth, 2003; Bouchard, 2011). However, advancing this question in the EU context and approximating its policy as oriented to interculturalism is debatable. Initially, it requires deep analyses of the EU policy instruments and the strategy to describe its policy measures as

interculturalism-oriented, but also there is a need for greater clearance about the concept of interculturalism itself. For example, it is ambiguous what constitutes a common cultural link between different groups and how it is possible to establish it without having Muslims sacrifice their traditional identities. The question is, for whom is interculturalism an optimal model of integration? A group of scholars consider that interculturalism serves for European societies to ensure homogeneity despite European migration regime and whether it means for Muslims to rethink their cultural identities are beyond consideration of interculturalists (Banting & Will, 2010; Meer & Modood, 2011; Shorten, 2010). So, a favourable opinion neither over EU interculturalist policy nor regarding the interculturalism model constitutes ultimate truth. This topic becomes more contested in the aspect of common European identity formation.

Almost two decades ago, Talal Asad asked whether Europe could represent Islam. In response, he argued that in the multicultural European societies where the highest value is human freedom and human rights, if this aspect becomes an indicator of Europeanness, Europe can accommodate each individual's cultural and religious differences. Nevertheless, Asad emphasised that it is a fact that Europe, as conceived of by Europeans, cannot fully include a Muslim presence. He explained this by the narrative of European identity, which rests upon the western civilisation, where everything that Islam stands for is being demonised (Asad, 2002, p. 209). From this perspective, if the previous accusation against the EU over secularism is the merit of western civilisation, then neither in the past nor in the future can Muslims be considered as Europeans as long as Islam defines their identity. In line with this, Wojciech Brzozowski discussed the approach of the EU towards Islam and the compatibility of Islam with the European identity (Brzozowski, 2018). He overviewed the attitudes against Islamic traditional symbols and practices in the European societies and analysed what kind of practice the EU supports in this respect. Brzozowski concluded that the hostile attitudes towards Islam had been institutionalised in many European countries expressed in the ban of religious symbols or certain religious practices. However, the EU did not consider it a problem as its policy supports the national laws and norms of the Member States. On this ground, the author assumed that the EU policy of building common European identity does not consider Islam, which means Muslims adapt their religiosity to the concept of Europeanness (Brzozowski, 2018, p. 1).

Furthermore, Ayaan Hirsi Ali argued that identity formation is usually based on disseminating shared history and shared destiny. In the EU political discussions, the common history and the destiny of European societies are defined by the preservation of European cultural heritage, which amongst many components contain respect to European liberal

democracy. In his opinion, liberal societies do not consider religion as a part of cultural identity but a spiritual practice that does not impact the individual's value system. In other words, it is a human right to believe in God and worship, but the values system that defines a lifestyle is founded on the liberal ideology (Ali, 2005, pp. 51-52). From this perspective, Muslims do not share a common history with the people of Europe, but they are also deprived of the possibility to share the same destiny with them, as Islam is not simply a religion, but it defines the Muslim lifestyle. This is an incentive for the author to believe that European identity does not envisage the place of Islam in European societies. However, since Muslims are a significant part of European societies and cannot be excluded from the process of common European identity building, he describes it as a deficit of common European identity (Ali, 2005).

Though scholars approached in their discussions the topic of Muslims and the EU from different perspectives, to unify their theoretical conclusions about multiculturalism, interculturalism, European identity, Islam and the European Union leads to the following findings: The EU and its institutions promote the secular tradition of the western civilisation, which also received the name of liberal-democracy. The problematic aspect of EU's vision of European identity building is that amongst universal principles of human rights and freedoms the key European value is secularism and secularism always prevails. The previous discussion of EU court decisions regarding Muslim religious symbols suggested by Xenidis elucidated that secularism is more valuable than the human right to the freedom of manifestation of religion (Xenidis, 2018, p. 41). So, in multicultural Europe, where the secular way of life defines Europeanness, all cultural groups, whose identities are defined by religious traditions, have to accept the principle of secularism to meet the requirements of being European. For them, this means sacrificing certain customs and traditions that are not compatible with the secular lifestyle. This results in homogenous societies, which is opposite to multiculturalism, and many describe it as assimilation. However, western scholars prefer the concept of interculturalism. Suppose the intercultural management of cultural differences has a basis of a common cultural link that facilitates shared identity building, and such a link is Europeanness based on secularism. In that case, interculturalism is just another name for the integration process, which does not embrace Islam and urges Muslims to secularise. Such a scholarly finding is still debatable and requires a deeper understanding of the EU policy and different integration theories, but it is also apparent that European societies are not in the position to embrace Islam. In this respect, scholars emphasised that European right-wing populism against Muslims and Islam is a challenging threat to the EU, which it has to respond swiftly.

In 2016 the book *What is populism?* of Jan-Werner Müller was published. He described the Islamophobic rhetoric of right-wing parties in European countries. Incidentally, Müller indicated that liberal parties, such as The People's Party for Freedom and Democracy (VVD) in Netherlands or Liberal Alliance in Denmark, also support the 'deislamisation' of Europe (Müller, 2016, p. 37). This is a dangerous tendency in the EU context because if European societies speak one voice against Islam, then the EU has to take serious actions to transform them from Islamophobic to inclusive societies. However, some scholars argue that the EU chose the strategy of attributing the rise of Islamophobia in Europe to the radical right, which is a gesture of clearing away the guilty feeling and pointing the finger at some extremist groups (Kedikli & Akça, 2018; Serra & Jordan, 2019). In fact, the authors emphasised, it is a dominant position of the non-Muslim EU citizens and has been embraced in the 'mainstream' culture to declare Islam as a threat to the European civilisation. Attitudes against Muslims and Islam are openly hostile and discriminatory everywhere in Europe. So, they called upon the EU to start a fight against Islamophobia with the acknowledgement that it is not only a radical right to blame for but also this phenomenon is being lived up in the most liberal European societies (Kedikli & Akça, 2018; Serra & Jordan, 2019). In the opinion of Lacin Idil Oztig and his co-authors, the Islamophobic rhetoric in Europe ranges from the radical right and extreme social conservatism to the soft expression of liberal populism and human rights activism. Hence the EU now more than ever needs a complex approach to the multitudinous coining of the 'Muslim problem' and the strong vision for culturally diverse and inclusive Europe (Oztig et al., 2020).

Some scholars are more critical towards the EU and lack a conviction that the political course that the EU maintains towards European Muslims, their cultural integration, and the common European identity building is not a recommendable method to combat Islamophobia. Others approximate this question with a mild criticism considering the complexity of Islamophobia and advise the EU to rethink its policy. However, in most cases, those scholarly discussions are based on the perfunctory analysis of the EU policy and missing the main point to comprehend how the concept of Islamophobia has been coined in the EU policy discourse. Any scholarly attempt to approximate the policy of the EU towards Muslims lacks plausibility if it does not address a question of recognising Islamophobia as a valid category. According to Erick Bleich: 'Developing Islamophobia as a concrete and usable social scientific concept is not only the basis for meaningful comparative and causal analysis in academia, it is also the foundation for more informed public debates and for more effective policy decisions' (Bleich, 2012, p. 185). Following this, how the EU conceptualises Islamophobia is of crucial importance. Nevertheless, not many scholars have come to that point yet.

A pioneer who began to research the conceptualisation of Islamophobia by the EU was Chris Allen (Allen, 2010). He started the analysis with the European Monitoring Centre for Racism and Xenophobia (EUMC) publications, where this agency did not even attempt to define the term Islamophobia. On the contrary, EUMC preferred to refer to Islamophobia in its reports as internationally agreed standards on racism. On this basis, Allen argued that in the working reports of the EU agency, it is difficult to establish whether the concept of Islamophobia is deployed as an equivalent to racism or it has another meaning. According to Allen, in each of the EUMC's publications, Islamophobia is undefined term, which cannot be fully understood, but only presumed. However, the author explained such vagueness around the concept by the fact that Islamophobia was a neologism and relatively a new phenomenon (Allen, 2010, p.87). In the twenty-first century's first decade, the scholarly and political discourse around Islamophobia was a debate of conceptual definition. In line with it, Bleich also brought the example of some scholars who deployed the term of Islamophobia without conceptualisation (Bleich, 2012). Despite such a conceptual practice, Allen advanced the criticism of the EU that in absence of conceptual understanding and a working definition of this term, the EU policy cannot fully overlap all aspects of Islamophobia combat (Allen, 2010, p. 89). In 2017 he returned to this question again and concluded that the EU and its human rights agency address the problem of Islamophobia as human rights violation, which is a result of fear and prejudice against Muslims and Islam (Allen, 2017). Such a broad and imprecise understanding of Islamophobia still could not facilitate practical policy actions of the EU. However, parallel to the criticism of the EU regarding the conceptual negligence over Islamophobia, it is noteworthy that the scholars remain passive to comprehend the conceptualisation of Islamophobia at the EU institutional level. On the one hand, the scholarly reference to the question of Muslims and Islamophobia in the EU policy context is quite critical, but on the other hand, there is a lack of academic interest to analyse the EU policy formulations and the discourse of its political language about Islamophobia to establish the understanding of how the EU coined this concept. It seems that scholars have overlooked the central question in the EU policy context, which could lead to significant findings of the EU and its policy approach towards Muslims and Islam.

To sum up, the analysis of the EU policy approach towards Muslims and combating Islamophobia is an emerging ramification in the scholarly debates. Up to the modern time, with some exceptions, the EU policy is not a key question in the Islamophobia discourse. The literature on this topic is limited with an overall, incomprehensive or a short reference to the EU's role in Muslim cultural integration and combatting Islamophobia. Therefore, a gap in the existing literature and the increasing Islamophobic reality in the EU requires scholars not to

limit themselves with an overall call upon the EU to act but to comprehend the EU policy, identify its flaws and suggest recommendations. The EU policy towards Islamophobia should not be a subject of secondary academic discussions, but it should be a central question. With this in mind, the current research of the EU's policy impact on the integration of European Muslims and combatting Islamophobia contributes to the new scholarly ramification in the Islamophobia studies and the studies of the European Union.

3.6. Concluding remarks about the debates on Islamophobia, Muslim cultural integration and the scholarly reference to the EU

Islamophobia and Muslim cultural integration are broadly debated topics with several dimensions. This chapter addressed the five main aspects of the scholarly discourse related to the historical origins of Islamophobia, its modern trends and a working definition, the cultural othering of Muslims, the crisis of multiculturalism, and general scholarly references to the Muslim question in the EU policy context.

Despite the scholarly dissensions and attempts to characterise Islamophobia as a modern European phenomenon, arguably, prejudicial and discriminatory attitudes towards Muslims are rooted in the history of antagonism between Muslims and European Christians, which continued through the era of colonialism. In the eyes of the Occident, the Orient always had a negative image of an 'uncivilised civilisation' created by inferior to the Westerners people. Therefore, the second half of the twentieth century up to modern times is when the humiliation and hatred that Muslim communities experience came to be referred to as Islamophobia. A peculiarity of this phenomenon in modern times is a changing reality in which Muslims are no longer people living beyond the borders of Europe but are already living in Europe and constitute a cultural and religious minority. So, the scope of Islamophobia has changed. A range of new factors such as migration, terrorism, media, and anti-Muslim literature has influenced the European hostility against Muslims and Islam. Gradually, Muslimness has been characterised in Europe as a problem, becoming a bottom-line of Islamophobia. This led to their stigmatisation. Muslims became the cultural 'other' of Europe. They have been branded with the label of cultural alterity that cannot be removed by cultural assimilation, which could help Muslims make their existence in Europe tolerable. As a result, the 'Muslim problem' in Europe pointed to a fear of multiculturalism and a crisis of multiculturalism policies. The fundamental

reason for rejection is a European self-image of cultural superiority, which does not consider any other cultural identity equal, a kind of European state of mind that is unlikely to be altered. It, thus, becomes a matter of policy to deal with the problem of Islamophobia and Muslim cultural integration. However, scholarly debates have not covered this domain thoroughly. Hence filling the gap in the existing literature is one of the reasons for writing this dissertation. Discussions about the complex phenomenon of Islamophobia, the coining of the Muslimness as a problem, and the European fear of multiculturalism indicate a need for the EU's involvement so that policymaking may succeed there, where the unmanaged process of cultural integration is doomed to fail. With this in mind, the next chapter explains the possible ways and theories of cultural integration to embrace European Muslims into European societies and how a particular policy model could influence the process.

Chapter IV. Integration theories and policy models: A theoretical framework

Scholarly debates have revealed that Islamophobia and the coining of Muslimness as a problem is, in particular, the main impediment to the cultural integration of European Muslims in European societies (Freedman, 2004; Jansen, 2013; Meer & Madood, 2010). However, an effective integration policy may eradicate the cultural antagonism in the way that it deals with 'diversity, recognition of immigrant minorities, and their incorporation in society' (Green et al., 2015, p, 675).

As suggested in the introductory chapter, this dissertation envisages multiculturalism and its principle of equal citizenship as the possible and fair way of altering the prejudicial attitudes towards Muslim cultural otherness and eliminating the manifestation of Islamophobia in Europe. Hence, this chapter overviews fundamental theories about cultural integration and the relevant policy models to explain why multiculturalism is the optimal model of integration that becomes a measure of the EU's policy approach towards Islamophobia and the integration problems of European Muslims. Though there are multiple integration theories and policy types, the research focused on the following models:

- Assimilation
- Multiculturalism
- Cultural hybridisation/Interculturalism

Understanding the postulates of each integration model and how they accommodate the fight against Islamophobia depends on the policy elements and characteristics. Theoretical overview elucidates how the similarities are coined and what distinguishes those models from each other.

4.1. Assimilation

At the centre of assimilation is the popular idea that immigrants who carry a different cultural identity sooner or later conform to the cultural values of the host society. This is either the result of living together for a long time or the impact of a relevant policy that obliges immigrants to acculturate (Schneider & Crul, 2010, p. 1143). In both cases, if the cultural behaviour of an individual or a group of individuals is significantly changed to fit into the heterogeneous cultural atmosphere of the host society, it conforms to a particular model of cultural integration

known as assimilation. It takes the form of cultural homogenisation, in which immigrants accept the beliefs, practices, and rituals of the dominant culture and stop practising their own traditions and customs (Schneider & Crul, 2010, p. 1144). However, theory-building about assimilation is more complex and contains various scholarly assumptions in the disciplines of anthropology and sociology.

From the sociological perspective, assimilation is a process of acculturation (a change in cultural behaviour), resulting in the significant obliteration of cultural differences. This process begins when different cultural groups meet in the same socio-economic space and socialise, which implies learning social norms of behaviour acceptable in the particular society (Hirsch, 1942, pp.35-36). According to Yann Algan and his co-authors, socialisation is an initial phase of assimilation, in which migrants already have the same access to socio-economic opportunities as natives, before they gradually change cultural behaviour under the influence of the host societies' culture (Algan et al., 2013, p. 11). Socio-economic integration facilitates cultural integration, as it creates a space for cultural transitions. Otherwise, immigrants and the host society cannot come to share a common culture through a natural process of interaction and participation based on the principle of equality (Algan et al., 2013, p. 11). This assumption is similar to the classic assimilation theory originating at the Chicago School of Sociology. Prominent representatives of this school were Robert Park, Ernest Burgess, and Fayette Mckenzie, who said that the social convergence of immigrants in the host society facilitates the adoption of the native culture (Mckenzie, 1914; Park & Burgess, 1924).

In line with sociologists, who take a socio-economic perspective in theorising assimilation, anthropologists also consider socialisation a crucial factor for acculturation. Diverse cultural groups are expected to fully adapt to the dominant culture through the irreversible process of social, economic, and cultural integration. According to Raymond Teske and Bardin Nelson an anthropological analysis of cultural assimilation is not possible without sociological factors of integration (Teske & Nelson, 1974, p.351). However, an anthropological perspective of assimilation is more comprehensive in the theory-building process as its main focus is on a gradual process of cultural change. For example, Irving Hallowell described assimilation as a dynamic process of gradually disappearing newcomers' original cultural identity and behaviour favouring the host societies' culture. Its dynamic character provides that the process moves from socialisation (learning social norms of the host society) irreversibly to acculturation and continues towards complete assimilation (Hallowell, 1940, p.690). Therefore, a range of terms, such as acculturation, socialisation, or assimilation, are not interchangeable. In fact, they

describe the different phases of integration. Silke Hans assumed that a variety of concepts implying the integration process understood as synonyms with assimilation is rather a product of populist political debates, but in cultural studies, they represent different phenomena (Hans, 2010, p. 4).

However, besides political discourses, the interchangeable use of assimilation and acculturation may be found in old scholarly works, making the conceptual differentiation more complex. This approach is inherent, for example, in the book by Milton Gordon (1964), who provided a typology of integration and captured this process in different models. In Gordon's view, the initial phase, when immigrants begin their customisation to their host society, implies cultural assimilation, which he also names acculturation, meaning the significant change in the cultural behaviour of immigrants. He considers cultural assimilation/acculturation to be a necessary step towards integration. However, Gordon emphasises that a precondition is that different cultural groups should not remain in spatial isolation and lack contact. Their cultural assimilation/acculturation ultimately depends on the degree to which these groups are in contact with the dominant population through different platforms of cultural dialogue. Change of immigrants' cultural behaviour through the people-to-people contact inevitably leads to the next stage of socio-economic integration, which means that immigrant groups acquire an equal place in the social and economic life of the host society at the expense of losing their traditional distinctive characteristics (Gordon, 1964, p. 19). Such an assumption contradicts the previously discussed theory of Hallowell (1940) and the representatives of the Chicago School of Sociology (Mckenzie, 1914; Park & Burgess, 1924), who considered socialisation or social convergence of immigrants in the host society as the first stage towards acculturation. Gordon's theory about assimilation has also been rejected in the next generation of socio-anthropological scholarship.

A group of scholars do not share the same idea of understanding cultural assimilation as Gordon's. For example, Richard Alba and Victor Nee argued that socialisation and acculturation imply adaptation to a social and cultural reality, which does not necessarily mean assimilation. Moreover, socialisation and acculturation suggest respect for the social and cultural atmosphere into which the immigrants move and adopt the social and cultural norms of the host society to the extent that immigrants become an integral part of the society. These processes take the name of assimilation when it leads to an absolute change in the cultural behaviour of the immigrants in favour of the host society's culture (Alba & Nee, 1999). This shows that cultural assimilation cannot be seen as an interchangeable form of acculturation, as

Gordon theorised, because only such acculturation that reaches a maximum degree and in which migrants entirely change their traditional cultural behaviour amounts to cultural assimilation. So, the main objection to Gordon's assumption is that cultural assimilation is not the initial phase of the process but the end phase.

On the contrary, Joan Grusec and Paul Hasting explained how socialisation differs from the process of acculturation. He emphasised that socialisation is the initial phase in the process of integration that starts between culturally different groups immediately when they come into contact but may not result in assimilation. He defined socialisation as acquiring a place in society through social contact and by respecting its norms. One may stand on an equal social footing with others without changing his/her traditional culture (Grusec & Hasting, 2008, p. 3). For example, there are groups of immigrants, e.g. Russians, Indians, Chinese, who remain culturally different but manage to integrate into the social organisation of western European societies. Thus, it opposes the classification of cultural integration suggested by Gordon. He considered that immigrants' socialisation means acquiring an equal place in the social life of the host society, which is a consecutive process of cultural assimilation when immigrants change their cultural behaviour significantly. However, Grusec described socialisation as a process that takes place at the beginning of integration to the extent that immigrants get to know the basic norms of the host society, find employment, or start education. This does not necessarily lead to a significant change in their cultural traditions or customs.

Gordon's approach to deploying the terms acculturation and assimilation as synonyms to describe the same process of cultural transition appears further incompatible after the theory-building suggested by John Berry (2005). Berry argues that acculturation is a process of cultural exchange that starts between culturally different groups in the phase of socialisation, implying the social contact between them. He denies that acculturation is an irreversible process leading to assimilation. Similar to the theory of Hallowell (1940), Berry considers acculturation as a dynamic process that may take a positive or a negative turn, depending on the possibility of conflict and negotiation. On the one hand, if a culturally different group of immigrants starts adopting the dominant culture of the host society in the process of negotiating cultural differences, it would lead to assimilation. On the other hand, at the time of negotiating cultural differences, if immigrants decide to stay loyal to their traditional culture and the host society does not embrace them, it may trigger a conflict. In the end, a conflict may result in segregation (isolation of immigrants from natives) and not in cultural assimilation (Berry, 2005, p. 697).

The abovementioned theories, therefore, seem to compete with each other in the theorisation of cultural assimilation. Nevertheless, disregarding the classification theory suggested by Gordon, other scholarly assumptions describe assimilation as a dynamic process, which starts with socialisation, and after a significant degree of acculturation, may reach the maximum level of cultural homogeneity —assimilation. However, the distinctiveness of Gordon's theory from other scholarly assumptions depends on the peculiarity of whether assimilation is a process or an outcome. If assimilation is considered as a gradual cultural change that ends up with immigrants' traditional culture going into oblivion, then it is a process. Gordon's theory is not entirely different from this perspective, as it sees assimilation as a gradual, long-term acculturation process, whereas Berry, Hallowell, Alba and Nee imply it as an outcome. In Gordon's assumption that assimilation leads to socio-economic integration, the focus is on fostering the acceptance of immigrants in the social and political life of the host society, as they are culturally alike. This line of thinking is not distinctive from the previously mentioned Chicago School of Urban Sociology. According to the study of Astrid Hamberger, in the early twentieth century, representatives of this school frequently popularised the term 'integration' in connection with 'assimilation'. These two concepts have been developed together and applied interchangeably in the USA and Western Europe to refer to the process of social and cultural change as a result of the interaction of immigrants with the representatives of host societies (Hamberger, 2009, p. 2). Eventually, these concepts have been separated in modern scholarly studies, and assimilation has become a particular model of integration.

Interestingly, schematically listing assimilation amongst the models of cultural integration does not mean that it is a desirable one. In the case of Muslims, the rational indication of assimilation theories is that such a model does not imply any respect for universal European values, but Muslims are expected to give up their cultural and religious identity to fit into European societies. Hence, this violates their fundamental human rights and freedoms. Moreover, recalling the earlier scholarly discussion on cultural otherness, which pointed out that the problem lies with the European prejudice about Muslims being uncultured and dangerous, then assimilation constitutes execution of such a prejudicial narrative as it enforces the change in Muslim cultural behaviour, so they become alike to the members of the host European society (Adida, Laitin & Valfort, 2016; Marranci, 2004; Vaise, 2008).

In sum, different study perspectives of assimilation also lead to theoretical differences. Scholars deployed a bulk of terms such as socialisation, acculturation and assimilation, which in some discussions are synonymous or describe different phases in the long process of cultural

change, where assimilation is the final point - the outcome. So, assimilation could name a dynamic process of a significant change in immigrants' cultural behaviour and also an outcome of this process. Nevertheless, a common understanding of assimilation is that immigrants stop practising their traditional culture and adopt a new one. Therefore, in the policy discourse, this does not constitute a solution for the integration of Muslim immigrants in European societies. It is not democratic and in compliance with human rights to force immigrant groups to abandon their traditional culture and adopt the host society's culture. In this context, multiculturalism is more likely to offer a solution that envisages Muslim culture as a peer to the European one and does not urge Muslims to abandon their traditional way of cultural existence. Whether immigrants stick to their own customs or adopt the cultural values of the host society is a crucial point for differentiating assimilation from another model of integration such as multiculturalism.

4.2. Multiculturalism

The newcomers do not necessarily have to sacrifice their own cultural identity and practices in order to feel welcomed by the majority. There is another approach to cultural integration, which suggests a model of multiculturalism. From the multicultural perspective, it is not only a group of newcomers who have obligations and responsibilities, but the host society, too, should adapt to the new cultural reality, in which they do not enjoy homogeneity, but other cultural groups also live among them (Green, 2015, p. 675). In this context, cultural integration takes the form of a bilateral agreement between immigrants and the host society that they respect each other's cultural differences and agree on the way of living together as equal but culturally different groups (Hellyer, 2009, p. 6). In this sense, a tolerant attitude and openness of the dominant majority towards culturally different newcomers is the cornerstone of multiculturalism. Hence, in the case of Muslim immigrants, the main characteristic of a multicultural pattern is that the host European societies may welcome Muslims despite their cultural differences and let them enjoy cultural freedom. In this model of living together as culturally different groups, Muslim immigrants' membership in the host society does not come at the expense of cultural sacrifices. They keep practising their individual faith and customs freely (Talmage & Knopf, 2017). However, similar to the theories of assimilation, theory-building about multiculturalism is also a complex process. The concept has been defined, contested, redefined, and rejected several

times, so the nature of multiculturalism remains debatable. Nevertheless, supporters of multiculturalism explain what this type of integration is all about and how it really works.

Scholars mainly differentiate between multiculturalism as a social fact and a category of cultural integration. The social fact about multiculturalism implies an approach that, despite various theories and conceptualisation methods, or even rejection of multiculturalism as an integration model, the world lives in a descriptive multicultural reality, which points out that humanity is divided into various cultural groups. All groups are different because of their traditions, customs and values. Jonathan Seglow stated: 'Multiculturalism can be acknowledged, championed, challenged or rejected, but it cannot be ignored because it describes a central feature of the world in which we live' (Seglow, 2018, p. 156). He argued that different theories or rethinking of the concept could not change multicultural reality. Hence, a right and honest approach towards cultural integrity would be accepting this reality and acknowledge that multiculturalism is not a 'decorative but a permanent feature of our public social world' (Seglow, 2018, p.157). Likewise, Stephen Spencer has argued that there is a lived reality of different cultural identities beyond the myth and rhetoric about multiculturalism. In his article, Spencer quoted the words of Les Back, who suggested that multiculturalism describes 'the diversity of traces that we all carry, whether we know it or not, whether our skins are pale or whether they are black or brown' (Spencer, 2009, p. 164).

Besides multicultural reality, there is a category of integration model, which considers multiculturalism as a structural pattern of living together by culturally different groups within a single social organisation so that those groups are not forced to change their cultural behaviour at the request of the majority. However, it became the most debatable integration model in Europe in the context of migration, raising the question of cultural acceptance of non-European immigrants in the host European societies. According to Thomas Eriksen, the multicultural model of integration describes the coexistence of different cultures in a common spatial area as a single society (Eriksen, 2015, p.13). Despite the current debates about multiculturalism, which comprises a variety of conceptualisation attempts and rethinking of its theories, Erikson applied the definition of multiculturalism that had been developed in the field of cultural anthropology earlier in the twentieth century. This approach suggests that different cultures are to be seen as equal (Erikson, 2015). The principle of equality is the cornerstone in the conceptualisation of multiculturalism. Nadia Moawad and Sherine Shoura consider that it is a new model for the cultural establishment in societies that became multicultural through immigration. It encourages that type of integration in which immigrant groups can retain their traditional culture, practice

it freely, and still have an equal footing with the dominant cultural group of the host society (Moawad & Shoura, 2017, p.802).

Though cultural freedom and equality are the main principles of liberal democracy, some scholars and policymakers in western societies have tried to reject them as a less preferable model of integration. Will Kymlicka claimed that multiculturalism should be rethought and re-designed to meet the current challenges of migration and integration. He stated:

‘Liberal multiculturalism, I would argue, was theorised for situations in which immigrants were seen as legally authorised, permanently settled, and presumptively loyal. In an age of securitisation and super-diversity, these assumptions are put into question. Early theories of multiculturalism now seem at best incomplete, and at worst out-dated, resting on assumptions and preconditions that may no longer apply’ (Kymlicka, 2015, p. 244).

It appears that Kymlicka and fellow critics of multiculturalism apply a slightly different and negative meaning to this term. For example, Conrad William Watson says that the central ambiguity about the concept of multiculturalism is a misleading interpretation of how different cultures may interact if they do not modify their traditions and cultural values. He has argued that the term multiculturalism is sometimes understood as the coexistence of closed, self-sufficient cultures, in which people from one cultural group do not interact with others (Watson, 2000, p. 37). In response to this, Giuliana Prato unmasked the theoretical weakness of anthropological studies that fail to defend the idea of multiculturalism and to establish that cultural differences do not set cultures apart. In line with a critique of the essentialisation of the concept of culture argued by Lila Abu-Lughod (Abu-Lughod, 1991); Prato pointed out that an anthropological approach of cultural relativeness encouraged some scholars to see culture as a 'thing' shared by a particular group of people and the uniqueness of each culture to be considered as a difference, which eventually set different cultural groups apart (Prato, 2009, p. 10-14).

Whether it is the weakness of anthropology that multiculturalism gradually led to a negative interpretation is debatable, but, at some point, even those scholars who defend the idea of multiculturalism refer to the possibility of the emergence of separate cultural groups. For example, John Berry says that while the presence of cultural diversity within a single society is what multiculturalism refers to, there is also another core element of equitable participation incorporated in this concept. If policymakers and governments fail to ensure equal participation of all cultural groups in society's social, political, and economic life, then multiculturalism may

become the reason for stigmatisation and segregation (Berry, 1979; 2013). However, what Berry or previous scholars try to acknowledge concerning the problem of multiculturalism, in fact, is the issue of multiculturalism as a policy. If cultural diversity becomes the ground of conflict and separation, this does not mean that multiculturalism as a model of integration is weak, but rather the integration policy is not effective enough to meet the goals of multiculturalism. Theoretically, multiculturalism cannot have negative connotations, such as separation or segregation, because its fundamental idea is to negotiate cultural diversity so that all cultural groups in society enjoy cultural freedom and expression when they are also entitled to equal social, political and economic rights. As Berry and Colleen Ward emphasised:

‘diversity without equal participation will lead to separation or segregation; equal participation without diversity will result in assimilation or the pursuit of the melting pot; in the absence of diversity and equity, marginalisation and exclusion will likely occur; but when both diversity and equity are present, integration and multiculturalism are found’ (Berry & Ward, 2016, p. 441).

In this sense, multiculturalism is the preferable model and conception in a multicultural reality that guarantees equal participation of culturally different groups in all social spheres. Furthermore, the interculturalist criticism of multiculturalism, claiming the absence of inter-group interaction, is not rightful. In fact, the idea of multiculturalism is based on the idea of equal citizenship, which means that different cultural groups respect the cultural differences of each other and they are united in the political, economic, and social organisation within a single society, whose rules and legal norms are familiar to them all.

4.2.1 The principle of equal citizenship

The term ‘multiculturalism’ appeared in the 1960s in countries with cultural diversity like Canada, Australia, the USA, and to some extent, Britain. The focus was mainly on the inclusion of indigenous people and the postcolonial immigrants in the case of Britain to avoid secessionism and marginalisation. So, the governments came to the idea of forging multicultural citizenship, which means granting equal social, political, economic, and cultural rights and opportunities to all cultural groups (Meer & Modood, 2011). Hence, in multicultural societies, what eliminates the risk of conflict and brings culturally diverse groups together is the idea of equal citizenship. For example, Tariq Modood described multiculturalism as a civic idea and

argued that granting all cultural groups the same rights and responsibilities without any discrimination was a cornerstone of peaceful coexistence, in which everyone enjoyed social and cultural respect (Modood, 2007, p. 6). In this sense, multicultural groups continue their interaction in everyday life, creating a link fostered by the principle of equal citizenship.

This principle works in the same way for Muslim immigrants as well. For example, when Tilo Sarrazin blamed Turks and Arabs for living in closed communities in Germany and bringing no benefit to the German society, except only selling vegetables and fruit in the streets (Sarrazin, 2009, p. 198), he probably did not realise that his argument was a perfect example of multicultural citizenship. Indeed, Turks and Arabs are famous for their selling skills, but how does it prove they fail to integrate? If they build small businesses in Germany and pay taxes as any ordinary law-abiding citizen, they are already integrated into German society's social and economic life. Furthermore, their children go to the same schools as other Germans, and they get the same social welfare and share responsibilities. The only difference is their cultural identity, which is a matter of human rights and the core principle of democracy in western societies. This is how true multiculturalism works. According to Ivan Kalmar, multiculturalism is not to play up cultural differences but to respond to them by civic unity so that different cultural groups are equally included in the society they live in (Kalmar, 2018, p.15).

Having said that, multiculturalism is not an ideology of cultural isolation but about civic integration so that different cultural groups are free to enjoy cultural freedom and at the same time be committed to the social and legal order they live in. This is why Barry described multiculturalism as a demographic pattern in Europe, an ideology and project accepting diversity and group rights (Barry, 2001, p. 3). However, the next question is: how would multicultural citizenship work for immigrants who do not hold citizenship in European countries?

Whereas citizenship is a legal status that grants individuals a range of political rights, such as the right to participate in elections, other rights and responsibilities could equally be shared with the immigrants. Michal Bodeman and Gökçe Yurdakul assume that in a multicultural society, where a group of immigrants lacks the same political and legal rights as ordinary citizens, the options are to force them into exclusion or to grant them equal opportunities and socio-cultural rights so that they can easily integrate with the society and are entitled to the status of legal citizenship (Bodeman and Yurdakul, 2006, p. 13-14). Similarly, earlier in 2000, Thomas Faist argued that in times of transnationalism and migration, civic unity, in which immigrants and natives equally share group rights and obligations, created bonds between

multicultural groups of the society (Faist, 2000). In this sense, the principle of equal citizenship does not imply the legal status of citizenship but grants immigrant groups the same rights and obligations as if they were holding citizenship. A multicultural approach to the integration process entitles immigrants with equal opportunities, rights, and obligations and grants them the possibility to apply for legal citizenship.

Thus, multiculturalism and the idea of multicultural citizenship are designed to encourage immigrant integration into a society's economic, social, and political life despite their cultural differences. It aims to form a civic bond among culturally different groups, so the society they constitute may function as an integral whole. Though some scholars are concerned that there are not enough intercultural relations that bring different cultures close to each other in the model of multiculturalism, the core idea of multiculturalism is that integration should create a civic bond and not a cultural bond. Formation of the cultural bond comes at the expense of cultural approximation, which limits minority groups' cultural rights and does not seem democratic. Democratic societies should build their unity on the sense of civic and not cultural belonging. Therefore, European Muslims should not have to reject their Muslimness to become equal members of European societies. If they are committed to the general principles of human rights, democracy, and the rule of law, which are the central European values, then cultural patterns should not be grounds for their exclusion.

However, the criticism of multiculturalism and attempts to rethink it come from interculturalists, people who do not entirely reject multiculturalism but support an idea of cultural cohesion.

4.2.2 Multiculturalism or interculturalism?

Critics of multiculturalism are interculturalists who, besides civic bonds, envisage immigrant integration as a cultural interaction and approximation process. According to Gérard Bouchard, interculturalism is a 'new formula of coexistence', which has been designed to promote a dialogue among different cultural groups on the basis of reciprocity. Eventually, it should lead to a cohesive society where there are no separate cultural groups, which runs counter to the main attribute of multiculturalism (Bouchard, 2011, p. 435). Similarly, Richard Zapata-Barrero considers that interculturalism does not have an alternative, as it fosters intercultural communication and relations between people with different cultural backgrounds, thus erasing

cultural boundaries and eliminating the process of ‘selfing’ and ‘othering’ (Barrero, 2017, p.1). In addition, Tony Booth gave interculturalism a more comprehensive definition:

‘[It] is concerned with the task of developing cohesive civil societies by turning notions of singular identities into those of multiple ones, and by developing a shared and common value system and public culture. [...] In building from a deep sharing of differences of culture and experience it encourages the formation of interdependencies which structure personal identities that go beyond nations or simplified ethnicities’ (Booth, 2003, p. 432).

Having said that, it is unclear why interculturalism is a more preferred model when a cohesive civic society is at the core of multiculturalism as well. Like Nasar Meer and Tariq Madood emphasised, qualities such as encouraging inter-group communication, recognising diverse cultural identities, promoting unity and liberal cultural practices prescribed for interculturalism also represent the significant features of multiculturalism (Meer & Madood, 2011, p. 175). Multiculturalism or interculturalism—such a framing of the question is not correct, argued Charles Taylor, since both paradigms share the same positive qualities of common liberal values and toleration, which are decisive factors to enable culturally different groups to live together peacefully within a single society (Taylor, 2012, p. 413). It would be rational to focus on the distinguishing principles in the context of comparative analysis.

Often, intercultural critics of multiculturalism refer to the unbridled practice of – in Westerners’ eyes – illiberal cultural traditions such as circumcision/clitoridectomy or arranged marriage. Geoffrey Brahm Levey pointed out that it is difficult to get support for the paradigm of multiculturalism in the case of those cultural groups, which stand for illiberal cultural practices and violate certain norms of human rights (Levey, 2012, p. 2017). In response, its defenders say that multiculturalism does not imply unlimited freedom to practise certain cultural traditions that are against human rights. Though it is debatable what is illiberal and what is not, there is a range of activities that is not acceptable in the western world, such as underage marriages or mutilation of female genitals. The multicultural principle of equal citizenship undermines such not legally accepted activities. Moreover, the idea of multiculturalism seems more liberal than its interculturalist revision. Barry says, ‘If we take a very broad definition of multiculturalism so that it simply corresponds to the demand that cultural diversity be accommodated, there is no necessary conflict between it and liberalism’ (Barry, 2001, p. 205).

What challenges liberalism is instead the idea of cultural approximation developed by interculturalists. Interculturalism does not support the coexistence of different cultures next to each other without participative interaction. Its objective is to give impetus to the mutual process of cultural transition in which culturally different group of immigrants exchange their cultural differences in favour of the dominant culture of the host society. For example, Booth chose his words more carefully by referring to the supra-national public culture, which he described as a civic bond built upon the shared cultural differences. However, interculturalism goes beyond the civic bond and means cultural approximation, which negatively influences minority cultures. Intercultural dialogue implies a process of negotiating cultural differences based on reciprocity, in which the host society transmits its culture to the immigrants. For example, Europeanness is already acknowledged as a supra-national public culture that should be shared by all residing in Europe. So, Muslims are expected to share the already existing supra-national European culture. Hence, interculturalism appears to be nothing less than a denouncement of Muslimness and an effort to push European cultural values forward.

In sum, though there are more critics of multiculturalism than supporters amongst western thinkers, this does not change it that allegations about multiculturalism could be exaggerated. The idea of equal citizenship means that everyone is equal before the law. So, anything illiberal and against human rights is prohibited in democratic societies to which all cultural groups are committed. The values that define good and equal citizenship unify all despite their cultural belonging. Furthermore, the interculturalist view of cultural approximation with the aim of creating a common public culture eventually leads to the acculturation of Muslims into the dominant European culture. Though some scholars prefer the term interculturalism in the West, this approach is instead an indicator of immigrant hybridisation.

4.3. Hybridisation

A model of cultural integration, which implies a partial change of immigrant cultural behaviour and leads to the formation of a novel culture, refers to cultural hybridisation. In Western scholarship, it is more common to term the same model of cultural integration interculturalism to give it a positive branding, but this dissertation prefers to apply the term hybridisation because of its merit. In this process, immigrants acquire the dominant cultural values, but do not necessarily stop practising their own customs (Kuran & Sandholm, 2007, p.201).

Originally, the word ‘hybridisation’ emerged from biological and botanical studies, meaning half breeding—the process of producing offspring by mating two parents from different varieties and species (Abbott et al., 2012). However, it has a slightly different definition in the cultural domain, resembling semi-assimilation, with the difference that the outcome of the integration is a new cultural variation.

Theory-building regarding the cultural hybridity is a relatively new process. The term hybridisation was completely unknown in the study of human culture and linguistics until the early twentieth century. Cuban anthropologist Fernando Ortiz described the hybrid nature of Afro-Cuban culture and called it transculturation as ‘the extremely complex transmutations of culture that have taken place’ in Cuba (Chomsky et al., 2019, p.25). Later, in the analysis of cultural hybridity, Robert Young, addressed transcultural relations amongst people of different races and cultural origins, which led to the formation of a novel culture. As a result, the term hybridity has been applied as a metaphor of composition comprising different cultural elements (Young, 1995). Overall, in postcolonial studies, hybridisation or hybridity has been attributed to people who had to live between two or more cultures, and their cultural identities have been impacted as a result of cultural plurality. Homi Bhabha was among the pioneering scholars who established a theoretical nexus between the concept of hybridisation and immigrant societies. He stated that immigration is connected to a transfer from one cultural environment to another. So, immigrants who bring their traditional culture into a culturally different host society are forced to navigate between different cultures. In order to adapt to a new society but, at the same time, retain the main elements of their traditional culture, primordial immigrant identity embraces the norms and values of a new culture. This way, a hybrid cultural identity of immigrants is being formed (Bhabha, 1994, pp. 13-15).

In postcolonial studies, the academic discussions on cultural hybridisation overlapped with solely scientific assessments and did not acquire any negative connotations. However, over time, parallel to increased migration processes, in which immigrant generations were raised in a dual cultural environment—the traditional culture in the family and the majority culture of the public—cultural hybridity acquired a negative meaning (Deer & Burrige, 2005). It often suggests impurity and otherness or an imitation of the majority culture. Drawing parallels to the earlier discussion about Muslims being labelled as the cultural ‘other’ of Europe, cultural hybridity does not constitute a means to ensure the embracing of Muslims in European societies as equal cultural beings. Hybridisation may push Muslims to imitate the cultural traditions and norms of the host societies, but, on the other hand, they are not accepted as being a peer to other

Europeans because of their Muslimness and non-European origins (Stolcke, 1995; Vaise, 2008).

The ‘hybrid Muslim’ is a modern Muslim with European values and a secular individual who has no commitment to the traditional ways of practising Islam. Yet, the problem is that any connection to traditional Muslimness may remain a reason for stigmatisation. According to Rahat Raja, in case of European Muslims, the pressure is on the imposition of cultural homogeneity (Raja, 2012, p. 110). He emphasised that the idea of European public culture is equal opportunities, non-discrimination, respect for the principles of freedom, equality, and other fundamental rights, which also contain the right of minorities to preserve their culture and religion. With this in mind, European Islam reveals the flexibility to transform and become compatible with European values. Nevertheless, Muslims are unlikely to be considered equal to Europeans. They may change their cultural identity to the extent that it does not conflict with European secularism, but their Muslimness will remain incompatible with the European project (Raja, 2012). Raja’s assumptions are in line with the discussion about changing Muslim identities in Europe suggested by Aziz Al-azmeh and Efi Fokas, who assessed that a hostile atmosphere against European Muslims is an evident sign of Europeans not accepting cultural differences. European societies do not consider European Muslims worthy of the name - ‘European’. Muslims may change their cultural identity, but they will continue to live with stigmas. A Muslim-born may hybridise into the European culture but will still not be equally embraced into the European society because being Muslim-born cannot be changed (Al-azmeh & Fokas, 2007, p. 4). Therefore, what these scholars argued pointed to a weakness of hybridisation as an integration model. Muslims may change their cultural behaviour to a certain extent and pretend to be Europeans, but a hybrid Muslim remains a cultural ‘other’. In fact, what Raja or Al-azmeh and Fokas discussed had very little to do with the traditional process of hybridisation, which Young and Bhabha addressed in their works. In the traditional understanding of the hybridisation process, it is advantageous for a migrant to navigate and find a balance between two and more cultures. However, a problem arises when the immigrants’ cultural hybridity is not sufficient for their cultural acceptance in European societies.

Thus, a classical theory of hybridisation contains the idea that a migrant may mix the elements of primordial cultural traditions and the norms of the host cultural group within a new identity formation process, which leads, in common sense, to a novel culture, such as European Islam—a modern face of traditional Islam that shares the central European values. However, when other groups envisage Europeanness as being impossible next to Muslimness and even a

hybrid Muslim remains a 'significant other', then hybridisation cannot achieve the desired outcome of cultural integration.

In sum, different theories of integration explain the ways of living together by immigrants and members of the host societies. However, not all types of integration are desirable for immigrant groups, as they do not accommodate their cultural differences. For example, assimilation changes the traditional cultural behaviour and hybridisation grants partial cultural freedom to the immigrants. Therefore, the most liberal way of living together appears to be multiculturalism, in which everyone enjoys the right to practise their traditional culture. At the same time, all groups are unified within a civic bond of equal citizenship. Nevertheless, some criticise multiculturalism and initiate an intercultural model of integration, which is another name of hybridisation, as it aims at cultural approximation, to form a shared public culture. However, in reality, public culture is always the majority culture. So, interculturalism ends up with the cultural hybridity of immigrants. Hence, multiculturalism remains, in culturally diverse societies, the only fair way of living together.

However, cultural integration is not a solely natural process, and there is a factor of policy that can modify it to ensure a desirable outcome. Policy also plays a significant role in analysing why multiculturalism is the optimal integration model for European Muslims as assimilation and hybridisation often violate the fundamental principle of human liberty.

4.4. Cultural integration policies

The choice of a particular cultural integration model is a matter of policy. Broadly, the policy concept refers to the scope of action or inaction that has a particular outcome (Torjman, 2005). Considering the variety of integration theories, hypothetically, there may be as many policy types as there are integration models (Algan et al., 2013). As a result, the implementation of assimilation, hybridisation or multiculturalism as a living model among Muslim immigrants and the host European societies depends on the relevant policy. However, to define what kind of actions or inactions build up the particular model of cultural integration is sophisticated for several reasons: first, a particular action within the scope of a policy could be attributed to two or more models of integration; second, the claimed policy goals may not coincide with the actual outcome of policy actions; third, the policy may have a general character without a

strategy—a plan of action to achieve the determined goal. Nevertheless, a comprehensive analysis of each policy measure and its character always points out the policy trend. In policy studies based on policy trends, it is possible to anticipate a possible outcome that may eventually support the particular model of cultural integration (Penninx & Mascarenas, 2016, p. 19-20).

Another significant aspect in the analysis of cultural integration policies is the types of policy instruments. Generally, it refers to the tools that governments or other political actors use to influence the policy outcome (Howlett, 2009; Salamon, 2011). Having said that, one must consider a variety of tools that may impact the cultural behaviour of immigrants, their freedom to practise traditional culture, and their ability to live together within the European societies. It could be mainly divided between legal and educational policy instruments (Yudof & Levin, 2011). Using education for the purpose of integration is common. According to Philip Lampe, the education system is a tool in the hand of policymakers to transmit national culture and values to newcomers and their generations with the help of teachers (Lampe, 1976, p. 228). In this sense, the determination of the particular integration policy rests upon the types of laws and awareness-raising teaching for the targeted groups. With the help of cultural integration theories, it is possible to identify how legal and educational instruments could be used to facilitate a particular model of cultural integration: assimilation, hybridisation or multiculturalism concerning European Muslims.

4.4.1 Policies of assimilation and hybridisation

It would be misleading to argue that there is a classification scheme on how to distinguish one integration policy model from another. In this particular case, guessing tools and attributes of the immigrant integration policies rest upon the previously discussed theories of cultural integration. For instance, the theory-building around assimilation and hybridisation is quite similar. The crucial difference between those models lies in the degree and the character of changing a group's cultural behaviour (Bell, 2014). Followingly, it is not very easy to draw boundaries between the instruments of assimilationist policies and the policy tools aimed at the hybridisation of immigrants. The cornerstone of cultural assimilation is that one culturally different group adopts the culture of another and stops practising its own (Adida, Laitin & Valfort, 2016; Marranci, 2004; Vaise, 2008). Logically, a policy that aims to facilitate such a process contains legal and educational instruments to erode the traditional culture of people

who are the subject of assimilation. On the contrary, the backbone of the hybridisation policy is to change the cultural behaviour of the targeted group to the extent that they play an equal role in the mainstream social, political, and cultural life of the society (Bhabha, 1994; Kuran & Sandholm, 2007; Young, 1995). Interestingly, theory-building about assimilation and hybridisation has nexus of colonialism and postcolonialism because examples relevant for both policy types could be detected in the colonial and postcolonial governance models.

Historical examples of assimilationist policies from the colonial and postcolonial past are being retained in different continents. At different times, the cultural assimilation of natives and aborigines in Africa, Australia, and America throws light on its main characteristic. For example, a model of assimilation of Native Americans in the United States contained a plan that could obliterate the traditional aboriginal culture (Waters, 1990). Similarly, French and British colonial policy in Africa had a strategy to acculturate African people with French and British mainstream culture and social norms (Bensaid & Landjial, 2012). For this purpose, French was spoken in the French part of Africa, and in British colonies, British English became the official language. Parallel to this, native Africans were forced to stop practising their 'uncivilised' traditional cultural rituals and share the cultural values of the coloniser (Lewis, 1962). Allegedly, a justification for limiting the cultural freedom of natives was to teach them civilised norms and bring them up to the European social and cultural level. Whether this was the actual reason for restricting their cultural freedom or a way to retain control over the conquered territories is a matter of another discussion. In the current discussion, a significant aspect of colonisation is that it aimed to change the cultural behaviour of the colonised people.

This process had a slightly different character in the postcolonial period. For example, the Australian Aboriginal Welfare Policy of assimilation in the 1960s provided aboriginal people with the same opportunities that the other Australians enjoyed. In order to help aborigines achieve equality with the rest of the community, the government started their training in all aspects to prepare them for living in an institutional environment (Lapham, 2002; Trees, 1993). However, the postcolonial cultural integration processes are, in fact, an example of cultural hybridity. Its primary goal was not to erase traditional aboriginal cultural traces but to include different cultural groups in society's mainstream social, political, and cultural life. In this sense, the Australian aborigines were taught public culture to foster their active participation in every aspect of the society and did not deprive them of the right to retain their traditional cultural elements (Paradies, 2006).

Though assimilation and hybridisation policies contain different strategies and their goals are not the same, the scope of action resembles each other in terms of an educative instrument. In the French and British colonies, natives were taught about French and British values and the official languages of colonisers (Bensaid & Landjial, 2012). In the postcolonial period, the example of Australia makes it evident that hybridisation was aimed at the formation of a novel culture among aborigine groups by teaching them new public norms and values of the mainstream society (Lapham, 2002; Trees, 1993). Eventually, it does not matter whether the outcome was total or semi-assimilation of targeted groups; in both cases, integration policies used the instrument of education to teach them popular culture. A difference is that assimilation of colonised people aimed at a total prohibition of native culture, whereas the hybridisation policy forbade only those elements of aboriginal culture that were incompatible with the new public culture. However, the aspect of cultural change leads to the main point of differences concerning the use of a legal instrument.

Legal instrument constitutes a legal tool, such as laws, which introduce certain restrictions impacting the cultural rights of the targeted groups (Yudof & Levin, 2011). In the case of African colonies, people were obliged by law to speak the colonisers' language and stop practising their traditional cultural and religious rituals (Bensaid & Landjial, 2012; Waters, 1990). On the contrary, in postcolonial Australia, the law did not explicitly ban people from following their traditions and spiritual values but introduced a new standard of human rights and obligations common for everyone. Such laws protect the cultural rights of indigenous people but prevent them from carrying out any traditional rituals that contradict the public standard of human rights (Lapham, 2002; Trees, 1993). Thus, in the case of assimilation, the law is a tool of depriving people of their traditional culture, whereas, in the hybridisation process, it provides the same legal rights and obligations to everyone.

Given that, colonial and postcolonial models of assimilation and hybridisation may become the yardstick in analysing current European integration policies towards Muslim immigrants. Significantly, the legal and educational instruments in facilitating a total or partial acculturation of culturally different groups for integration with the dominant culture remains. Certain policy practices underwent modification. For instance, declaring the language of the coloniser as the official language and banning native languages; adopting legislation that forbade natives from practising their culture and pursuing spiritual activities; prohibiting those indigenous cultural practices that are in contradiction with public norms; introducing an education system that promotes only the dominant culture and its values. However, modification of assimilative

policy instruments does not mean that they went absent. As Andrew Armitage said, historical assimilation tools remained the same and only took on a modern face (Armitage, 1995, p.4).

Interestingly, colonial and postcolonial models of assimilation and hybridisation cannot be directly applied as a precise measure of modern integration policies towards Muslim immigrants for the following reasons: Unlike the colonial or postcolonial periods, the current cultural integration process takes place on the territory of Europe. Muslim immigrants have not been conquered, but they voluntarily came to live in the European societies. Hence, according to Berry, a factor of migration is a modifier that raises the responsibility of immigrants individually and in groups to adapt to their new cultural, economic, and social reality (Berry, 1997, p. 6). In this sense, specific attributes of colonial and postcolonial policies are not relevant anymore. For example, the law about the official language, which always was the coloniser's language, constituted the initial step towards assimilation or semi-assimilation of natives. In terms of immigrants, the language of the host society is already the official language. If immigrants fail to learn it, then they would lack the possibility of socialisation. As Christina Boswell pointed out, the cultural dimension of integration is measured by all aspects of cultural life, among which knowledge of the language spoken in the host society and complying with its basic norms are common for all models of cultural integration, irrespective of the extent to which immigrants are expected to acculturate (Boswell, 2003, p. 437). Similarly, Rinus Penninx considered acquiring the host society's language to be the central aspect of integration and not necessarily an indicator of assimilation or hybridisation (Penninx, 2005, p. 139).

Another historical illustration of assimilation or hybridisation policy instruments could be nineteenth-century America. It elucidates the role of education in changing the cultural behaviour of immigrants. When thousands of Europeans were emigrating to America, prominent Americans feared that the immigrants, who did not speak their language and carried with them different cultures, would outnumber them and jeopardise American social welfare. Hence, for the protection of homogeneity and to avoid cultural conflict, educators came to the idea of shaping immigrant generations to the American education model (Tyack, 1967). In 1836, at the annual meeting of professional teachers in Cincinnati, reformer and Biblical scholar Calvin Stowe expressed his opinion that the American education system should change cultural diversity and melt European immigrants into the Anglo-American culture. He stated: '[...]it is altogether essential to our national strength and peace, if not even to our national existence, that the foreigners who settle on our soil, should cease to be Europeans and become Americans' (Stowe, 1836, p. 149).

The nineteenth-century attitudes of Americans towards immigrants elucidate the peculiarity of assimilation and hybridisation. However, Americans aimed at complete assimilation, but the same instruments could also be used for hybridisation, with a slight difference in the degree and a dynamic of cultural change. If European immigrants remained partly loyal to their traditional values, hybridisation could also become the outcome of the abovementioned policy strategy.

However, the nineteenth-century American approach towards immigrant integration could be a good measure for current European integration policies. Though they may not share all aspects of historical colonisation, legislative and educational instruments remain the backbone of European policy planning.

4.4.1.1. Modern policy measures of assimilation and hybridisation and a nexus of Islamophobia

At the examples of colonial and postcolonial policies, particular measures could also attribute to the integration policies of assimilation and hybridisation in terms of modern Muslim immigrants. A significant aspect of both models is a set of legal tools to deprive culturally different groups of the right to fully or partially practice their traditional culture. Another instrument refers to the use of education to assimilate or hybridise Muslims.

However, if in the times of colonisation, the law directly forbade natives from following their cultural or spiritual rituals, using a legal instrument in the same obvious way is not compatible with modern democratic principles (Kuru, 2008, p. 2). For example, if European societies adopt a bill of religious and cultural rights that bans other cultures or religions except for European and Christian ones, it would discriminate against cultural and religious minorities. With this in mind, in present European societies, it is unlikely that an integration policy may contain the claimed plan of limiting the cultural freedom of others, but it does not mean an absence of such legal tools. In the name of European values and secularism, certain legal norms could be adopted, which do not explicitly forbid cultural groups to practise their traditional culture or religion but may produce a similar outcome in the end (Kuru, 2008, p. 2).

Furthermore, in the context of education policies, some scholars assumed that European education systems in most countries are based on the assimilative or hybridisation approach to teaching their national traditions to immigrants apart from the European values. Farzana Shain

argues that education in Europe has a historical connection with state attempts to manage cultural diversity by eradicating cultural differences. Public schools are a field of diminishing minority cultures. Immigrants learn to accept majority culture and norms (Shain, 2013, pp. 65-66). Maja Schachner and her co-authors described in the research of European school systems that the adjustment of immigrant youth to the host society follows acculturation which has a central feature of developing new cultural identities. This helps immigrant youth orientate between traditional culture and the host society's culture (Schachner et al., 2017). Drawing parallels to the colonial and postcolonial practices, the fundamental similarities come to light. The colonial schools were set up to instil colonisers' traditional values and cultural practices in the indigenous people. This practice was established in America much earlier to integrate European immigrants. Later, in the postcolonial era, the main goal of education was to form a common public culture, which resulted in native and aboriginal traditions going into partial oblivion (Mart, 2011). When immigrants from postcolonial or non-European countries come to Europe, they and their children are educated according to the same principle that stipulates the knowledge and appreciation of dominant culture. In many European countries, the school system focus on giving all resources to the type of school education in which immigrant pupils cannot practise their own cultural traditions. However, they learn to become fully proficient in the host society's language and acquire new cultural norms (The information network on education in Europe, 2004).

Legal and educational instruments based on assimilation or hybridisation approaches are familiar in France. In French schools, Muslims are required to learn about French values and also practise them. They are also deprived of the right to wear Muslim symbols as identity markers. Therefore, some scholars argue that French laws put immigrants in a situation in which they have no choice but to sacrifice their cultural and religious traditions or become marginalised (Bienkowski, 2010; McGoldrck, 2005).

These aspects revive the memories of colonialism because colonisers started banishing the traditional cultural identity of subjected people and replacing it with Western ones. This process began with the claimed emancipation of Muslim women. For instance, in his essay about Algeria, Franz Fanon described the French policy of unveiling Muslim women and stated that it was not about the emancipation of women. The headscarf was an Algerian cultural identity marker, which French coloniser strived to banish. He stated: 'The way people clothe themselves, together with the traditions of dress and finery that custom implies, constitutes the most distinctive form of a society's uniqueness, that is to say the one that is most immediately

perceptible' (Fanon, 1965, p.43). So, banning religious symbols was a cornerstone of the French colonial policy of assimilation, and similarly, in modern France, it represents a mechanism of forcing Muslims to acculturate.

Sarah Bienkowski concluded that French policymakers took assimilation too far. While some countries embrace the qualities that immigrants bring with them, in France, immigrants are required to replace their individualistic self-identity with the dominant French culture and erase visible markers of their traditional beliefs (Bienkowski, 2010). Dominic McGoldrick even considered French assimilationist laws and policy, aiming to ban religion from the public sphere, incompatible with human rights. The implications of traditional French values, which are based on secularism, do not justify for anyone to limit the cultural freedom of others. McGoldrick specified that a ban of religious symbols in the name of secularism strip Muslims of their traditional religious and cultural customs (McGoldrick, 2005). Contrary to this, some may argue that a ban on religious symbols does not discriminate against Muslims or neither does it forbid them to practise their religion and culture. However, is it so? Indeed, Muslims, as well as any individual in France, enjoy the freedom of religion. There are thousands of mosques in France where Muslim men and women can pray. Nevertheless, the practice of traditional culture comprises a lot more than praying in mosques. Wearing religious symbols such as a veil and niqab in public and Muslim prayer on the street are Muslim cultural traditions that are forbidden under French law. This means there are legal instruments aimed at assimilation or hybridisation that indirectly impact the cultural freedom of Muslim immigrants depending on the degree and dynamics of the applied legal measures.

Another example of modern assimilationist or hybridisation policy is the Danish approach towards an immigrant culture. According to Christine Jensen, Danish integration policy formally prioritises a pluralistic integration of culturally different immigrant groups. It is based on the principle of equal citizenship and aims to ensure that, despite cultural differences, immigrants are able to participate in social, cultural, political, and economic life on an equal footing with the natives (Jansen, 2014). In fact, respect for Danish traditional culture and values is seen as a significant part of immigrants' successful integration, which goes beyond liberal norms and immigrant groups are forced to discard their cultural identity. Per Mouritsen and Tore Vincents Olsen emphasised that, in the case of Muslim immigrants, their cultural and religious traditions were perceived as fundamentally different from Danish liberal values and undermined social cohesion. Hence, the Danish strategy is to Europeanise Muslims so that such diversity does not constitute cultural and social problems (Mouritsen, 2006; Mouritsen and

Olsen, 2013). Concerning the earlier discussion on the demonisation of Islam and its portrayal as a threat to European democracies, the Danish approach is the best illustration of it. The Danish integration policy is neither liberal nor tolerant towards Muslim culture. An argument for it is the so-called Danish 'Ghetto Law'. In 2018 the Danish Government adopted the plan 'Denmark without any parallel societies—No ghettos in 2030'. They defined a ghetto as a place where more than half of the population is non-EU immigrants who have been unemployed or convicted for the last two years. A plan to reduce ghettos comprises the proposal of mandatory 25-hour a week training for immigrant children in the Danish language, Danish traditions, norms, and values (Justesen, 2018, p. 1). Some scholars have criticised it. Rosa Mathiasen and Sara Olson separately carried out comprehensive studies on this topic and concluded that this type of Danish law is discriminatory and assimilationist. It leads to indirect discrimination insofar as non-European immigrants, who are mostly Muslims, have been portrayed as ghetto people refusing to integrate, as they do not share Danish values and cultural traditions. So, they pose a problem for the welfare state. It is discriminatory when the knowledge of traditional Danish culture is set as a precondition for social acceptance (Mathiasen, 2018; Olson, 2019).

As described in the introductory part, the policies of assimilation and hybridisation have nexus with Islamophobia. Interestingly, French and Danish examples also illustrate how the state policy may institutionalise Islamophobia. Scholars gave this phenomenon various names. Sayyid called it racialised governmentality, and Marcel Maussen addressed it simply as a mode of governance that unifies the ways and patterns of regulating and steering Islam in Europe by state institutions (Sayyid, 2014; Maussen, 2007). Maussen described the European form of governance as a complex set of legal rules or law-like regulations that hinder Muslim religious and cultural practices (Maussen, 2007, p. 46-48). Sayyid is rather critical in his theory about institutional Islamophobia. He explained racialised governmentality as a 'series of interventions and classifications that affect the well-being of populations designated as Muslim' (Sayyid, 2014, p.19). However, it is sophisticated to detect Islamophobia at the institutional level. According to Sayyid, such forms of governance do not directly mention Muslimness as a problem, but its policy outcome may produce such a result (Sayyid, 2014, p. 20). An illustration of such a national policy is the headscarf ban in France, which adheres to the principle of secularism and, therefore, has a legitimate justification. The key argument is that the law on neutrality is common to all citizens; hence, it cannot be considered as discrimination against Muslims or an act of Islamophobia. Furthermore, the positive effect of such a ban appears to have been scientifically proved. According to research by Éric Maurine and Nicolás Navarrete, the number of Muslim females graduating from school and their participation in the French

labour sector increased since the veil ban came into force (Maurine & Navarrete, 2019, p. 1). As a result, many believe that such laws are designed to emancipate Muslim women and not to discriminate against them. Nevertheless, Muslim communities and their supporters consider that these are arguments that antagonists of Islam want to place on the surface of debates, but, in essence, such a law is an attempt of framing Muslimness as a problem in Europe. They argue that female Muslims are free to choose whether to follow their religious tradition. Depriving them of this right amounts to racial discrimination against them and the bigotry of Islam (Gereluk, 2005; Senyonjo, 2007). According to Elizabeth Patino, people in Europe do not even try to understand why Muslim women wear the headscarf. Instead, they prefer the prejudice that they are forced to do so. Nobody wants to accept the explanation that it is their free will to manifest their religion this way (Patino, 2015). Despite dissensions on this subject, framing Muslimness as a problem is a critical component for detecting Islamophobia in the affairs of the state. In the example of France, the way of governance dictates that Muslims should either fit into the secular European society by changing their traditional way of life or they have to leave their schools, universities and employment places. In the legal and political contexts, many would argue about the irrelevance of Islamophobia in this regard, but in anthropological assessments, such a law is Islamophobic because it tags the traditional ways of Muslimness as a problem.

However, the state policy can institutionalise Islamophobia, but the reluctance of the government to address Islamophobia can also give the green light to everyday violence against Muslims. Furthermore, the state leaders may include Islamophobic rhetoric in their official statements. For instance, in the Eastern European societies, at the level of individual attitudes, media or politics, they incite open hatred against Muslims and Islam (Kalmar, 2018). This eventually leads to abusing Muslims and attacking their property. A peculiarity is that eastern European societies, which have always been nationalistic and sceptical towards the idea of a one-culture Europe, also started branding Islam or Muslims as a threat to Europe. Populist leaders of Eastern European countries – following their western peers – claim that Islam is a threat to European values. For example, Hungarian prime minister Victor Orbán described Hungary as the last ‘bastion against the Islamization of Europe’ and Miloš Zeman, president of the Czech Republic, named Islam as a religion of death, which, in the opinion of Gert Pickel and Cemal Öztürk, is a strategy of Eastern European leaders to portray themselves as protectors of European and Christian traditions (Pickel and Öztürk, 2018, p. 162). In this sense, western and many members of eastern European societies, despite their different historical trajectory visions of European values and the type of social organisation, are united in their antagonism

towards Islam and Muslims. Though there are many differences in western and eastern European manifestation of Islamophobia, in generic terms, it refers to branding Islam and one's Muslimness to be a problem for society there, or as Selman Sayyid formulated, 'problematization of Muslim identity', (Sayyid, 2014, p.15). In this context, it is significant that those processes are facilitated through state policy.

To sum up, despite dissension on this issue, it may be concluded that assimilation and hybridisation policies follow the same strategy, with differences in the dynamics and the degree of facilitated immigrant acculturation. Considering previously discussed colonial and postcolonial policies towards culturally different groups, the examples of Danish and French laws bear a resemblance to them and illustrate that such policy actions may support assimilation and hybridisation of Muslims. They contain specific laws and a type of educational teaching that push immigrants to acquire the norms and values of the dominant cultural group. However, at this point, it is difficult to envisage to what extent such a policy may cause their acculturation and help to draw the boundaries between the two models of assimilation and hybridisation. In this sense, theoretically, the two integration models are different, but when it comes to the policy, they contain the same legal and educational instruments. Eventually, both assimilation and hybridisation policy models could lead to a legal limitation of Muslim cultural freedom. From this perspective, those policy models are also optimal to institutionalise Islamophobia. In the western European countries, it occurs under the mask of state-secularism, but on the eastern flank of the EU, the government often stands behind the Islamophobic rhetoric. As mentioned in the introductory part of the dissertation, the policies oriented at assimilation and hybridisation have different approaches towards Islamophobia, but none aim ultimately at its elimination. Those policies fail to embrace Islam in European societies.

However, the 'ugly face' of assimilation and hybridisation policies and the aspects of institutionalising Islamophobia provide the preference for multiculturalism policy.

4.4.2. Policy of multiculturalism

The policy of multiculturalism is nothing else but a way of implementing the relevant theoretical paradigms in practice. Its purpose is to ensure the cultural freedom of each individual, irrespective of the cultural group to which the person may belong. At the same time,

it promotes equal citizenship, according to which everyone has a sense of belonging to the same civil society (Barry, 2001; Madood, 2007; Meer & Madood, 2011). With this in mind, the policy of multiculturalism comprises those legal tools and educational methods that promote cultural diversity, protect minority cultures, and suggest an effective response to Islamophobia.

The first criterion in the discussion is the aspect of legal policy. In terms of multiculturalism, legal norms exist to protect different groups' cultural rights and freedoms and ensure their compliance with society's common norms and values. For example, Canada applies multiculturalism as a policy since 1971, which consists of the human rights laws and other legal norms that promote equality of all cultural groups and combat discrimination based on cultural differences (Wayland, 1997). However, it is worthy to note that modern policymaking in Canada is in the phase of rethinking multiculturalism concerning Muslims (Leung, 2011). In line with this, it is not easy to find an example of a modern multiculturalism policy where Muslims enjoy the complete protection of cultural rights. Leading discussion regarding Muslim immigrants in terms of multiculturalism implies the legal policy that protects Muslim religious and cultural rights. This means they are free to practice their religious rituals and traditions, including wearing their religious symbols to the extent that the human rights of all individuals and the norms of democratic society remain intact. Therefore, Muslims in the multicultural integration model are protected by law to not become victims of discrimination despite their cultural or religious differences (Seglow, 2018; Spencer, 2009). They receive legal protection to stand on an equal footing with the other members of society. However, safeguarding Muslim cultural freedom does not mean that they are pushed to create parallel societies or live in ghettos like it happened in Denmark. In the Canadian model of integration, or at least what was until recent years, it is guaranteed by law that Muslims have a possibility of social interaction based on equitable opportunities of education, employment, housing (Banting & Will, 2010).

The second aspect of discussion refers to multicultural education. Multicultural education aims at raising cultural awareness about the different traditions and customs of immigrant groups. It popularises the idea that being different does not mean being bad or inferior but having equal rights and importance as any other individual (Agada, 1998, p.78). According to Andrew Shorten, this type of education in a culturally diverse society contains the strategy to transmit the values and norms of a multicultural society. It is based on good citizenship, respect for cultural differences, tolerance, human rights, and freedom. Its specific aim in a multicultural society is to facilitate the recognition of minority cultures and understand how multiculturalism is constructed (Shorten, 2010, pp. 57-59). In addition, multicultural education is an instrument

of public policy, which aims to provide opportunities to minority cultural groups to maintain their customs and traditions while, at the same time, facilitate the construction of a civic society in which diverse cultural groups are included and to which they feel an allegiance (Banks, 2001).

Additionally, from this perspective, it is unlikely that racial governmentality exists where multiculturalism is a state policy. Within the scope of multiculturalism policy, there is limited space for those legal norms that could institutionalise Islamophobia (Jansen, 2013; Marranci, 2004; Sayyid, 2014). It is a reasonable indication that a cultural integration model with a preference for equal citizenship and embracing cultural diversities constitutes an optimal way to combat Islamophobia.

Promoting multiculturalism as a desirable way of cultural integration is not a shared idea amongst scholars. Many dislike it in the name of interculturalism. However, establishing unity in the form of a civic bond among culturally different groups and not problematising cultural differences seems primarily suitable to the existing cultural reality in Europe. Despite many attempts of rejection and rethinking, multiculturalism remains a way of promoting cultural integration based on equality.

4.5. Concluding remarks on the models of cultural integration

An overview of the cultural integration theories and the relevant policy scope established a framework of the possible strategic approach towards Muslim cultural integration and combating Islamophobia in the EU. In this sense, the cultural integration of Muslim immigrants may take the form of assimilation, hybridisation/interculturalism or multiculturalism. However, each model contains specific methods and policy instruments, except multiculturalism, that may not always lead to a desirable outcome for Muslims.

Based on the theoretical approaches, the relevant policy action or inaction in terms of cultural integration of European Muslims could be placed somewhere between multiculturalism and total assimilation, in which multiculturalism is a model that guarantees the highest degree of cultural freedom to Muslims. In contrast, total assimilation means zero cultural freedom for them. Hybridisation or interculturalism, as western scholars call it, stands in between multiculturalism and assimilation. Its policy facilitates the cultural approximation of immigrant

groups to the host society but, at the same time, guarantees a certain level of Muslim cultural and religious freedom. In practical terms, the implementation of the model of assimilation and hybridisation rests upon the legal and educational instruments oriented towards the prevalence of norms, cultural traditions, and values of the host societies. They create a pattern of social and legal organisation, in which immigrant groups can benefit from society's social and economic good if they confirm the values of the majority culture. With this in mind, this dissertation takes the perspective that the desired form of cultural integration is multiculturalism, which is based on equal citizenship despite cultural differences and follows the principles of fundamental human rights and freedom. In other words, Muslims should not be obliged in the European societies to modify their Muslimness so they can enjoy the benefits of equal citizenship.

Reviewing cultural integration theories and certain policy practices facilitated establishing a measure and a scope of EU's policy actions and inactions towards cultural integration of European Muslims and combating Islamophobia. Nevertheless, it is not the aim of the research, and neither does it anticipate to prove that the EU's relevant policy represents the model of assimilation, hybridisation or multiculturalism. The following chapters examine particular aspects of the EU's legal and 'soft policy', which may fit in the characteristics of three cultural integration models.

Chapter V. Cultural freedom of Muslim immigrants in the legal context of the EU and its implication in combating Islamophobia

The EU underlines that the Member States have an obligation to protect everyone from discrimination, violence and any other violation of human rights. This principle also applies to persons belonging to minorities. It is the duty of the state to ensure that the legislative system provides sufficient guarantees to protect the freedom of thought, conscience, religion or belief of every individual without distinctions (Council of the European Union, 2009, p.1). However, the objective of studying Muslim cultural freedom in the EU legal context is not whether the EU calls upon the Member States to protect human rights but to indicate how the EU community law ensures that individual Muslim rights are protected.

A study of the EU's legal policy approach towards the cultural integration of European Muslims has a human rights dimension. However, the human rights domain neither falls within the exclusive legal competence of the EU nor does it represent a standard-setter in the aspect (Búrca, 2011; Tawhida & Butler, 2006). So, some may say it has no relevance to studying the Muslim cultural rights and freedoms in the context of the EU Law. However, the research carried out in this field proved differently. The legal framework of the EU regarding the cultural rights of Muslim immigrants and minorities is the same provisional articulation of human rights about the freedom of religion and non-discrimination that Member States are obliged to follow, as it is an integral part of the EU community law. Furthermore, the religious freedom of Muslims and their right to non-discrimination is linked with combating Islamophobia. No policy may succeed in tackling different forms of Islamophobia and promoting multiculturalism if it does not guarantee cultural freedom and equal treatment of Muslims residing in the EU (EEAS, 2020, p. 7). This chapter examines the EU's legal policy towards the cultural rights and freedoms of Muslim immigrants in the following aspects: Freedom of religion, ban of discrimination based on religion, prohibition of hate speech, and hate crimes against Muslims.

The analysis aims at pointing out whether the EU's relevant legal policy tends to promote a particular model of Muslim immigrants' cultural integration, such as assimilation, hybridisation, and multiculturalism. Consecutively, it will establish to what extent the EU copes with the challenge of Islamophobia based on its legal framework.

However, in the process of data collection, it became evident that the EU lacks legal regulations in this regard. The source of the EU law is Treaties and five main types of legal acts: directives, regulations, decisions, recommendations and opinions (EUR-Lex, 2020).

Examination of the EU legal acts adopted on the topic of religious liberty, non-discrimination, prohibition of hate speech and hate crime revealed that the EU legal framework is limited to the Charter of Fundamental Rights of the EU (CFR), Council Framework Decision 2008/913/JHA on combating certain forms and expressions of racism and xenophobia by means of criminal law, Council Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation; and four judgements of the CJEU on the ban of religious symbols. Hence, analysing the cultural freedom of European Muslims in the EU legal framework seems problematic based on the scantiness of legal acts, but this should not become an impediment for the research. The methodological part of the research explained that the choice of the EU about 'doing nothing' to cope with particular challenges is also the policy (McConnell & Hart, 2019, p. 645). From this perspective, if the EU revealed a reluctance to address Muslim cultural rights and their non-discrimination in its legal acts becomes the subject of analysis and interpretation, which leads to the particular findings. Therefore, this chapter examines what the EU did and what it could do better to guarantee the cultural freedom of the European Muslims and combating Islamophobia within the EU legal framework.

5.1. EU's legal framework on freedom of religion and non-discrimination

Freedom of religion and prohibition of discrimination are coded in all major human rights treaties. In particular, the 1948 Universal Declaration of Human Rights (UDHR) adopted by the United Nations (UN) listed the right of religion and its manifestation as a fundamental human right. It also guaranteed the equality of all human beings before the law and protection of their rights without any discrimination (UDHR, art. 7; 18). Later, the right to freedom of thought, conscience, and religion has been stressed by the Council of Europe (CoE) in the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR). Enjoyment of religious liberty and any other right listed on the convention is secured without discrimination on any ground, including sex, race, colour, language or religion (ECHR, art. 9; 14). Dissimilar to this, the development of the EU-based human rights approach towards religious freedom and non-discrimination has a very specific character and a long history of establishing legal competencies.

At present, the EU, which can influence national policy-making in almost every significant aspect, is an outcome of several treaties signed at different times by the Member States. The

history goes back to 1950 when French Foreign Minister Robert Schuman proposed integrating the coal and steel industries of Western Europe. This led to the European Coal and Steel Community (ECSC) in 1951 by the Treaty of Paris (Treaty establishing the European Coal and Steel Community, 1951), which serves as a predecessor of today's European Union (EU). The same Treaty also established the European Court of Justice (ECJ) as part of the ECSC to ensure that the Member States complied with the community's laws. Decades later, ECJ played a significant role in the process that entitled the EU to have a human rights profile. Until the Treaty of Maastricht, known as the Treaty on European Union (TEU) (1993), the European Community (EC), later the European Union (EU), did not obtain the provisional reference to the fundamental human rights. Nevertheless, the community case law (the law as established by the outcome of former court cases) granted fundamental human rights, which had been previously obtained in the international human rights treaties, the status of unwritten 'general principles of community law' (Douglas-Scott, 2011, p.672). In its judgement regarding the preliminary ruling about the protection of human rights in the community legal system, the ECJ has stated:

'[...] respect for fundamental rights forms an integral part of the general principles of law protected by the Court of Justice. The protection of such rights, whilst inspired by the constitutional traditions common to the Member States, must be ensured within the framework of the structure and objectives of the Community' (Case 11-70, p.1134).

According to the ECJ, the source of human rights protection has been embodied in the general principles of community law, representing the common constitutional traditions of the Member States. Years later, this principle was codified in the 1993 Maastricht treaty, which provided that:

'The Union shall respect fundamental rights, as guaranteed by the European Convention for the Protection of Human Rights and Fundamental Freedoms signed in Rome on 4 November 1950 and as they result from the constitutional traditions common to the Member States, as general principles of Community law' (TEU, art. F2).

It was of great significance that in 2007 the Treaty of Lisbon, known as Treaty on the Functioning of the European Union (TFEU), referred to the duty of the EU to accede to the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR) adopted by the distinct human rights organisation—Council of Europe (TFEU, art.6). Though the discussions about the EU's accession to the ECHR were launched in 1970, the EU acted reluctantly about it. In 1996, the ECJ ruled that the accession agreement did not provide for

sufficient protection of the EU's specific legal arrangements, and this would cause 'a substantial change in the present community system for the protection of human rights in that it would entail the entry of the Community into a distinct international institutional system' (Opinion 2/94, p.1789). In the aftermath of such a ruling by the ECJ, in 1999, the EU started to elaborate its own bill of fundamental rights upon the mandate of the Council of Europe. In 2009, with the entry into force of the Lisbon Treaty, the Charter of Fundamental Rights (CFR) adopted by the EU became the source of its primary law and binding upon all EU Member States (TFEU, art. 6(1)).

In view of this, critics of the EU's human rights competencies are not entirely correct in their argumentation. It appears, the EU incorporated human rights protection into the community law. Its reluctance has been conditioned by an eagerness to avoid an obligation of liability under another regional organisation, and so it created its own Charter of Fundamental Rights (CFR). Though the adoption of the CFR did not transfer the EU to the human rights protection organisation, it ensured that the respect for religious liberty and prohibition of discrimination are part of human rights and dignity, which fall within the responsibility of the EU. Article 10 of CFR provides:

'Everyone has the right to freedom of thought, conscience and religion. This right includes freedom to change religion or belief and freedom, either alone or in community with others and in public or in private, to manifest religion or belief, in worship, teaching, practice and observance' (CFR, art. 10).

The right to religious liberty also raises the issue of non-discrimination on the ground of religion. In this regard, Article 21 of the CFR contains the provisional prohibition of discrimination on any grounds (CFR, art. 21). In line with this, Article 22 also stressed the obligation of the EU to respect cultural, linguistic, and religious diversity (CFR, art. 22). However, before the CFR became an integral part of the EU's primary law, the EU had already started to develop a domain of non-discrimination under the community law. In 2000, it adopted two directives: first, against discrimination on the grounds of race and ethnic origins (Council Directive 2000/43/EC); second, prohibiting discrimination at work on the grounds of religion or belief, disability, age or sexual orientation (Council Directive 2000/78/EC). However, it is of great significance that the racial equality directive (Council Directive 2000/43/EC) does not contain religious grounds; hence Muslims cannot evoke it to find the remedy for the religious discrimination. It follows from this that, despite critical views about the EU legal competence in terms of human rights protection, there is a legal basis for the EU to exercise its power in this

domain, but the question is whether the EU is willing to enhance the legal protection over religious discrimination.

A short overview of the legal history indicated that the EU gradually obtained the legal competence to incorporate the human rights standard regarding non-discrimination and freedom of religion in the community law. Hence, it can be assumed that the EU has a basic legal mechanism of action in terms of European Muslims' cultural freedom and combating Islamophobia. However, the legal framework to protect Muslim religious freedom and prohibit their discrimination is not exhaustive. Also, adoption of the law does not automatically mean that it is effectively applied. What comes into question is the matter of enforcing those written legal principles in the way to produce a desirable outcome in the best interest of Muslims.

5.1.1. A matter of applicability

The general principles of religious liberty and prohibition of discrimination on the religious ground protect all Muslims who hold the citizenship of the EU, but it is also equally applicable to Muslim migrants, who are third-country nationals and do not hold EU citizenship. Broadly, freedom of religion and non-discrimination is a fundamental right, which applies equally to every human being, regardless of their nationality, place of residence, gender, national or ethnic origin, colour, religion, language, or any other status. This principle is also incorporated in the CFR provision about non-discrimination, according to which no discrimination can take place on the basis of the status of an individual (CFR, art.21). It derives from the common principle of its universality and indivisibility and the equality of treatment, which third-country nationals enjoy compared to EU citizens under the EU Law (Council Directive 2003/109/EC; Directive 2011/98/EU). In the 2013 EU Guidelines on the promotion and protection of freedom of religion or belief, it is written:

‘Freedom of thought, conscience, religion or belief applies to all persons equally. It is a universal human right that needs to be protected everywhere and for everyone, regardless of who they are, where they live, and what they believe or do not believe in’ (Council of the European Union, 2013, p.1).

Furthermore, in 2004 was adopted a directive to regulate the terms of residence of third-country nationals, who are students and are deprived of a certain range of rights in comparison

to long-term resident third-country nationals (at least five years) and EU citizens. The 2004 directive contains a provisional emphasis on the fundamental rights and observances of the principles recognised by the CFR (Council Directive 2004/114/EC). In this sense, fundamental rights are a morally and legally justified natural claim, and no individual can be deprived of them in any legal system without injustice (Myers, 2017, p.11).

However, the applicability of the human rights laws could be limited by another law or provisional derogation, which eventually determines the extent to which one could enjoy the right to the freedom of religion and non-discrimination. Though there is no hierarchy in human rights, a legal derogation may limit the application of specific human rights in practice and in the broader sense of human life. This also happens in the EU legal context, but the nature of EU law is peculiar.

Initially, the human rights protection system in the EU has a different legal nature compared to the scope of the Council of Europe (CoE). Unlike the European Convention on Human Rights (ECHR), which is directly applicable to individuals, the CFR does not provide the same protections for EU citizens and third-country nationals residing on EU territory. On the ground of ECHR, individuals are entitled to address the European Court of Human Rights (ECtHR) when their fundamental rights are violated, but an individual cannot address the Court of Justice of the European Union (CJEU) directly and evoke the rights under the CFR (FRA, 2018, p. 31). Article 51 of the CFR provides that the underlying rights and principles of the Charter are applicable initially to EU institutions, and they apply to the Member States following the principle of subsidiarity when they implement the EU Law (CFR, art. 51). The principle of subsidiarity means, in the field, which does not fall within the exclusive competence of the EU, the EU cannot take actions unless they are more effective than the action taken at the national or local level (TEU, art.5). So, the applicability of the Charter at the national level should not limit the principle of subsidiarity and may confer the situations only within the EU's legal scope. This also means that the primary sources of individual human rights protection remain the national constitutions. Nevertheless, the Charter contains fundamental human rights, which can be relied upon directly by individuals in the sense of a 'horizontal direct effect' (Ceil, 2015, p.1). This is a legal doctrine developed by court in the 1994 case of Paola Faccini Dori v Recreb Srl., entitling individuals to make claims against other private individuals before the national court on the basis of the EU treaty provisions containing the individual rights (Case C-91/92). Furthermore,, in terms of EU directives that prohibit discrimination, individuals can rely on the legal doctrine of 'vertical direct effect', which means an individual can invoke the EU law in a

legal dispute against a Member State (Johansson & Lindström, 2017, p. 2). In the 1974 case of *Yvonne van Duyn v Home Office*, it concerned the obligation of a Member State to ensure its legislation is compatible with the EU law (Case 41-74).

Having said that, such peculiarities in the EU legal framework of human rights protection definitely raises the issue of its effectiveness. The truth is, the EU possesses basic legal competence that entitles it to take actions in the field of human rights that would transform it from a passive actor to a change-maker to set human rights standards for the Member States. However, the same laws oblige the EU to leave those responsibilities primarily to the Member States. In the general assessments, the EU cannot fully ensure the standard of human rights protection when it relies on the conscientiousness of Member States and leaves little space for the individuals to invoke their human rights directly at ECJ based on the community law.

Furthermore, in addition to the EU legal derogations mentioned above, the applicability of the EU legal competence regarding fundamental rights is limited by the law incorporated in Article 52 of the CFR (CFR, art. 52 (1)). Though all human rights are absolute and there is no hierarchy of rights, it constitutes an established practice to put a limit to the level of protection guaranteed by a certain provision. For instance, the prohibition of torture is of absolute nature, and it cannot be limited even by the law. However, in some legal systems like those of the United States of America, where death penalties are allowed in particular states, even the absolute right to life does not enjoy unlimited protection. Hence, there is a range of human rights, which contain inherent limitations (UNODC, 2018). The freedom of manifestation of religion is the subject of limitation as well. For instance, in the European Convention on Human Rights (ECHR), Article 9(2) provides:

‘Freedom to manifest one’s religion or beliefs shall be subject only to such limitations as are prescribed by law and are necessary in a democratic society in the interests of public safety, for the protection of public order, health or morals, or for the protection of the rights and freedoms of others’ (ECHR, art. 9(2)).

In contrast, the EU did not mention such derogation in the CFR. The CFR’s Article 10, which guarantees the freedom of religious manifestation, does not have anything about limitations regarding this safeguard (CFR, art.10). However, since the EU Charter has been adopted on the basis of the European Convention of Human Rights, it can be assumed that even the freedom of religion guaranteed under Article 10 of CFR offers absolute protection of this right, and it could be curtailed in the necessity to protect 'public order and safety, health and moral, or the freedom of others as it is indicated in the ECHR (ECHR, art. 9(2)). In addition, it constitutes a

general principle of the EU law guaranteed by Article 51(1) of the CFR that exercising fundamental rights and freedoms in the EU legal context is subject to limitation so that the national interests of the Member States can prevail (CFR, art 51(1)). Such an interpretation is also based on the EU guidelines on the promotion and protection of freedom of religion or belief adopted by the Council of the European Union, which stated following:

‘[...] freedom to manifest religion or belief e.g. in worship, observance, practice and teaching, potentially encompasses a broad range of acts, whose close and direct link with a religion or belief must be looked at on a case-by case basis’ (Council of the European Union, 2013, p. 2).

In this sense, freedom of religion and to manifest the religion is a universal human right, but the question is whether all kinds of rituals could be considered an act of religious manifestation. This is a significant aspect to consider in the discussion because such a principle may become a reason for prohibiting certain religious customs.

Thus, the EU has the fundamental legal competence to act in the field of human rights, but, at the same time, it is not in the position to fully exercise such a power. On the one hand, religious liberty and prohibition of discrimination constitute fundamental human rights for which the EU takes pride and responsibility. They are among the EU's core values and guide its actions at all levels. Human rights protection has been embedded in the general principles of community law and strengthened by the adoption of CFR. On the other hand, these legal principles have limited applicability in the case of individuals. Hence, the main source of human rights protection in the EU remains the constitutional traditions of the Member States. In addition, the community law can be evoked by individuals only in national courts, but the national law may limit the enjoyment of those rights if it is in the interest of public safety or confronts the matter of morality. It is also possible that the state does not acknowledge the nexus of certain traditions or customs to the manifestation of the religion. So, such derogations by law may lead to specific consequences in the hands of national lawmakers (e.g. state ban on religious symbols in Belgium, France), which has negative implications for the cultural freedom of Muslim immigrants and the combating of Islamophobia.

5.1.2. Implications of the EU's human rights derogations for Muslims

The concept of freedom differs among individuals and scholars. The most liberated definition of liberty is probably John Stuart Mill's description of it as unlimited individual freedom as long as it does not endanger the freedom of others (Mill, 1859, p.16). However, the previous discussion on the human rights' non-absolute nature indicated that the normative law shrank the idea of human rights and freedoms to the extent that their invincible value became deprivable. The consequences followed from the human rights derogations by law, which is justified under the EU legal system, is the central issue in studying the EU's legal policy approach towards cultural integration of Muslim immigrants and their right to enjoy cultural freedom.

A connotation of Muslim cultural freedom is their religious liberty, expressed in the manifestation of their religious rituals, traditions, and customs (Faruqi, 2007; Rahim, 2013). Muslim immigrants, in many cases, do not hold EU citizenship and are entitled to the status of third-country nationals. However, despite their duration of stay or the purpose of residence, they possess the right to enjoy the freedom of religion and protection from discrimination based on religion under the community law guaranteed by the CFR (art. 10). Nevertheless, protection of cultural freedom finds different ways of materialization in the life of Muslim immigrants. The study of the EU's human rights derogations and the limit of religious manifestation by law, in particular, revealed the overall implications of Muslim immigrants' cultural freedom.

The analysis of the EU legal framework to protect Muslim cultural freedom contains twofold findings. First, there is a lack of laws that protects Muslims against religious discrimination; and second, the existing laws are not applied to Muslims in their absolute character. Omitting religious ground from the legal framework of non-discrimination (Council Directive 2000/43/EC) identifies that the EU did not see a necessity of such a ban in other areas of social life except employment. It does not matter how the protagonist of the EU may attempt to justify this decision; it is the fact that the EU did not acknowledge the need to stress the prohibition of discrimination on the ground of religion. For illustration, 2000-2008 was a period when the EU denoted equality on the grounds of race, ethnicity or gender (Council Directive 2000/43/EC; Council Directive 2004/113/EC; Directive 2006/54/EC), but it left the aspect of religion beyond consideration, which has a particularly negative impact on Muslim communities in the EU to find a remedy against religious discrimination based on the EU law in other fields than employment. This also has an implication of combating Islamophobia as discrimination based on Islam is its constituent element (Runnymede Trust, 1997, p. 11). However, another

problematic issue for Muslims in the EU is that the community law, which they may evoke to find the remedy against discrimination or limiting religious liberty, is a subject of legal derogation.

Whereas religious liberty becomes a subject of normative modification, it affects the traditional way of life of immigrants like the Muslims, whose behaviour and daily existence is conducted by their religious beliefs, expressed in extensive religious symbolism (Barbulescu & Andreescu, 2009; Freedman, 2004; Jansen, 2013). The legal derogation of the EU automatically allowed the Member States to modify their human rights policies following their national norms. This may constitute a deadlock in the discussion for the legal experts, who are limiting themselves to the legal interpretation. However, in the anthropological discourse, even a legal derogation may evoke an interpretive analysis. In this sense, a legal condition in which the EU put a limit to its competence of human rights protection and complied with the national interests of the Member States — produces an effect on the cultural freedom of Muslims. The analysis of the EU legal framework provided a reasonable ground to believe that the EU's policy of protecting Muslim cultural rights follows the established standard of general human rights protection, which guarantees individual religious liberty and prohibition of discrimination based on religion. However, it appears that the EU's system of human rights protection has been designed to foster the cultural values of European societies. An elucidation of this is the preamble of the CFR. It states: 'The peoples of Europe, in creating an ever closer union among them, are resolved to share a peaceful future based on common values' (CFR, pmb.). Some in the field of legal expertise may find no implications here, but from the anthropological perspective, there is more to say.

The cornerstone of this research is that Muslim immigrants who are residing in the EU but whose culture is different from the European one should enjoy equal rights and freedom of cultural expression. In this respect, the legal system of the EU is not designed to protect the cultural differences of Muslims but to guarantee that nothing endangers European values and cultural traditions. What matters is not the provisional formulations of the EU human rights laws but what results they deliver in terms of Muslim cultural freedom. The legal consequences of the EU's approach towards religious liberty are not favourable to Muslims. The effectiveness of the entire EU legal framework has been questioned by a single derogation, which ensures that Member States constitutional traditions prevail (CFR, art.51). Since the constitutional traditions of the Member States line up with the European and national cultural traditions, it can be assumed that Muslim cultural liberties will be curtailed whenever they confront the

established European cultural practice. For instance, the ban on religious symbols in public schools is provided in the French legislation pursuant to the constitutional principle of secularism (Law n° 2004-228, art.1). This also indicates that certain religious customs of Muslims are not being acknowledged in European societies as freedom of religious manifestation. Considering the EU's human rights derogation, it is not always legally possible to establish a violation of the religious rights of Muslims. However, in anthropological discourses, it is evident that such bans have a reverse effect on Muslim individuals' religious and cultural liberties.

Some sceptics probably would argue that a ban of religious symbols does not limit individual religious liberties and the constitutions of the Member States guarantee everyone's freedom of religion and manifestation. However, is it so from the anthropological perspective? The significance of religious symbolism may have been underestimated in the legal domain, but it stands at the centre of anthropology while studying the cultures.

Considering the anthropological significance of religious and cultural symbols, prohibition on wearing them, and ban of certain clothing, e.g. headscarf, limit individuals from expressing their cultural and religious identity (Geertz, 1973; Tajuddin, 2018; Turner, 1975). If anthropologists agree that our culture and religion define who we are and what we stand for, then prohibiting individuals from expressing their culture or religion through symbolism pretty much amounts to depriving one of the right to express his/her identity. By way of deduction, it is evident that any law which stipulates such an outcome cannot be oriented towards multiculturalism and tends to be assimilative. As discussed previously, the basic idea of multiculturalism is individuality upheld in different cultural traditions and values (Green, 2015; Hellyer, 2009; Talmage & Knopf, 2017). So, any legal organisation, which forces individuals to put aside their symbols and look-alike, is incompatible with the model of multiculturalism. Recalling the discussion in the previous chapter about assimilation as an integration model and its implication for Islamophobia, it appears that if the EU's legal framework cannot provide for multiculturalism, then neither can it combat Islamophobia by way of protecting Muslim cultural values.

In sum, the EU's legal effect on the cultural freedom of Muslims is a top-down process, which does not seem designed for completely embracing multiculturalism. This aspect also complicates the combat against Islamophobia. The EU's legal effect on Muslim cultural rights is structured as following: On the upper level is the EU's legal framework and its derogations on human rights, which constitute a particular approach towards religious liberty. This allows

the Member States, on the second level, to enjoy the independence to modify the principle of freedom of religion and manifestation or to adopt the national laws that have an eventual effect on the cultural life of Muslim immigrants. An output of this top-down process is that, on the lowest level, it provides a fundamental human rights protection of Muslims and creates a space for the Member States to limit Muslim cultural and religious freedoms if their manifestation opposes the norms of the majority. Some scholars argue that if Muslims are not entitled by law to express their cultural and religious identity in certain situations where secularism prevails, they are subjected to discriminatory treatment (Modood & Kastoryano, 2007; Weller, 2006; Xenidis, 2018). However, the discussion about religious discrimination of Muslims is imperfect without the analysis of the EU case law on this subject.

5.1.3. EU case law regarding discrimination on a religious basis

The antagonists of the idea that Muslims in Europe suffer discrimination based on their religion or different cultural traditions may bring up the argument of protective laws. Allegedly, the law guarantees each individual's freedom of religion and non-discrimination despite their race, religion, nationality, ethnicity, or affiliation. Indeed, it is articulated in human rights conventions and constitutional laws that discrimination based on religion is prohibited. However, whether an individual can successfully seek the remedy for any human rights violation depends on the legal interpretation suggested by the court. Previous discussions on the EU legal derogations partly provided the argument for the infirmity of written human rights laws. The missing part of deliberation could be the matter of legal interpretation. Though the source of protection is the law, what produces the actual output is legal interpretation to establish violation (Dworkin, 1982; Endicott, 2011). This eventually affects the scale of liberty on which individuals may enjoy their rights. Referring to the freedom of religion in the EU's legal framework, the Court of Justice of the EU (CJEU) has the power to establish whether discrimination on a religious basis took place in accordance with the law. Case law, therefore, on the discrimination of Muslims is a consistent part of the EU legal policy approach towards the cultural freedom of Muslim immigrants. The analysis of the respective case laws could produce a result that enables one to draw parallels with the particular cultural integration model.

Having said that, the research discusses all four cases where the ECJ ruled on the prohibition of discrimination on the grounds of religion or belief. In the year 2017, the Grand Chamber of the Court of Justice of the EU ruled on discrimination on a religious basis regarding Muslim

women (Case C-157/15, *Samira Achbita v. G4S Secure Solutions NV*; Case C-188/15, *Asma Bougnaoui and Association de défense des droits de l'homme (ADDH) vs. Micropole SA.*). In both cases, the national courts referred to the Court of Justice with the request of preliminary ruling to rule whether discrimination took place following the Council Directive 2000/78/EC. As mentioned previously, the directive was adopted in 2000 by the EU to prohibit discrimination on any ground, including religion, at employment. It is known by the name of the Employment Equality Directive, which guarantees the principle of equal treatment (Council Directive 2000/78/EC, 2000).

On 14 March 2017, the Court of Justice in Grand Chamber submitted its judgment regarding the dismissal of Ms. Achbita (case C-157/15, *Samira Achbita vs. G4S Secure Solutions NV*). She is a Muslim female who took up an occupation as a receptionist in the private sector. The cause of dismissal was her refusal to stop wearing the Islamic headscarf, whereas it was the internal rule of the company to remain neutral to visible political, religious, and philosophical symbols. The Court of Justice discussed the case and found that there was no direct discrimination on the grounds of religion under Directive 2000/78. The court's decision was based on the circumstance that the company had a policy of neutrality for each employee; it did not solely consider Ms. Achbita.

In its second case (Case C-188/15 *Asma Bougnaoui and Association de défense des droits de l'homme (ADDH) vs. Micropole SA.*), the Grand Chamber found existing evidence supportive of a discrimination on a religious basis. In this case, Ms. Bougnaoui is a Muslim woman who worked at a private undertaking and was also fired for refusing to stop wearing the Islamic headscarf. The company did not have a neutrality policy regarding visible symbols, but wearing a veil upset a number of other employees. Hence, Ms. Bougnaoui was requested to come at work every day without a headscarf. But since Ms. Bougnaoui was disadvantaged in comparison with other employees and the principle of equal treatment had been violated, the Court concluded that her discrimination on the religious basis had indeed taken place.

Hence, in the first case, the internal rule of the company prohibiting any visible sign of political, philosophical, or religious beliefs became a sufficient ground to limit one's religious liberty and adjudicate that discrimination did not take place. In the second case, the non-existence of such an internal rule played a decisive role in protecting the freedom of religion. A simple circumstance granted a Muslim woman the freedom to manifest her belief. However, employers may adopt the internal rule on the neutrality of symbols, which obliges the employees to obey or leave their employment place. For illustration, on July 5th, 2021, the ECJ

ruled about the joint cases of *IX v. WABE eV* (C-804/18); and *MH Müller Handels GmbH v. MJ* (C-341/19). In the first case, WABE runs many child daycare centres in Germany, who in 2018, adopted the ‘instructions on observing the requirement of neutrality’ in its establishments (C-804/18, par. 25). As a result, the Muslim woman IX was fired because she denied taking off her headscarf. In the second case, in 2002, MJ was employed in a store of MH as a sales assistant. In 2016, the company adopted the internal directive prohibiting conspicuous, large-sized political, philosophical or religious signs in the workplace (Case C-341/19, par, 35). MJ was fired because she did not take off her headscarf. In both cases, the court did not find religious discrimination. It stated:

‘[...] an internal rule of an undertaking, prohibiting workers from wearing any visible sign of political, philosophical or religious beliefs in the workplace, does not constitute, with regard to workers who observe certain clothing rules based on religious precepts, direct discrimination on the grounds of religion or belief, for the purpose of that directive, provided that that rule is applied in a general and undifferentiated way’ (C-804/18, par.55; Case C-341/19, par. 90).

Followingly, in the legal context, there is not much space left for criticism. The court established that ‘a genuine need’ to ‘present a neutral image towards customers or to prevent social disputes’ prevails, recognised in article 16 of the CFR about the freedom to conduct a business following EU law and national laws and practices (CFR, art.16). However, the legal analysis may end here, but the anthropological debate continues. What is considered a stalemate in the legal discourse is the matter for further contemplation in anthropology.

The anthropological conception of legal judgment in all four cases focuses on the stance towards religious liberty. In ‘The Anthropology of Freedom’, written by Luca Parisoli, each person is metaphysically free to believe in and manifest the belief. This makes religious liberty a universal right, ‘but if the existence of a universal right is possible in virtue of a normative official document that speaks about it, a universal right is at the same level as every ordinary law’ (Parisoli, 1999, p. 355). The value of Muslim religious liberty has been declined in the normative virtue of legal interpretation. The court decisions revealed that freedom of religion, which includes the freedom of manifestation in public or private, can be curtailed based on simple circumstances. If any company or institution in Europe adopts an internal rule banning political, religious, or philosophic symbols among all employees, this is a legal justification to frame the value of religious liberty and finds no grounds for discrimination. At this point, this opposes the universal understanding of liberty and declines the right to non-discrimination and

changes the lives of individual Muslims in Europe. The headscarf, explained earlier, is a symbol of Muslim identity (Raja, 2012; Seglow, 2018; Spencer, 2009). It manifests the point that the person who wears the headscarf belongs to a different culture and religion than most Europeans—urging Muslims based on the secular norm of neutrality to stop wearing the Muslim symbol limits their natural right to manifest their belief and forces them to look similar to others. So, in its indirect effect, the court decisions also favoured assimilationism when it comes to Muslims' conflicting cultural and religious differences. According to Peter Cumper and Tom Lewis, the rulings of courts on the prohibition of religious symbols make it evident that 'the West is guilty of applying 'double standards' where Islam is concerned' because it claims freedom of religion but disenchant Muslims with secular liberal values (Cumper & Lewis, 2009, p. 22). Gareth Davies noted:

'It seems that Europeans, to a very large extent, are not prepared to afford [Islam or its stricter adherents] the same respect that they would to milder or more familiar beliefs. They remind them too forcefully, perhaps, of views that this continent has itself barely left behind' (Davies, 2005, p. 512)

The cases of Ms Achbita, Ms Bougnaoui, IX and MJ, elucidate the life of ordinary Muslims in the Western societies, who encounter discrimination on a daily basis, but whether they succeed in finding a remedy before the court is circumstantial. Indeed, sometimes they are forced to change their way of life and traditional values to fit into European societies. On the one hand, it is undeniable that the EU law guarantees the protection of the fundamental religious liberty of Muslims. Still, on the other hand, the EU court standardised that whenever Muslim religious customs contradict Western societies' secular values, the latter prevails. This perspective may provide for the interpretation that the legal practice of the EU contains the incentives for the hybridisation of Muslims. It could also support the assumption that Muslim cultural differences are problematised, which does not seem to counter Islamophobic prejudices. Nevertheless, this research would be unreliable to limit the discussion about Muslim religious rights by prohibiting religious symbols. Therefore, to establish the whole image of the EU's relevant legal policy, the research also focuses on the aspects of banning anti-Muslim hate speech and hate crimes.

5.2. The EU legal framework to combat hate speech and hate crimes against Muslims

Hatred is a complex phenomenon with moral, psychological, and legal aspects. According to the psychology scholar Ervin Staub, it constitutes a sturdy and obstructive feeling against the other person or subject (Staub, 2005, p. 51). In the work of Robert Sternberg, hatred is related to disgust, anger, and hostility, which contains a claimed or unclaimed will of eliminating the other (Sternberg, 2003). Hatred as individual emotion is already dangerous, but when it is shared by many and directed against other groups, this idea should be considered a threat to public order and security. It often finds expression in the form of racism and xenophobia. Islamophobia belongs to these categories as it consists of the component of hatred against Muslims. This type of emotional attitude has developed among many people of Europe over time; they had historically demonised Muslims, but, now, their immigration into European societies has become to them less than desirable. Muslims have become victims of stigmatisation since, in the perceptions of many Europeans, they are culturally perverse people (Bayrakli & Hafez, 2019; Eid, 2014; Hafez, 2015). Muslims are hated in Europe, which transforms large segments of European societies into haters. However bad this may sound, tragic are the consequences of anti-Muslim hatred.

Hatred—as an emotional stand—may find its expression as hate crimes and hate speech. A hate crime occurs when a prejudice-motivated perpetrator exercise violence against a victim on the grounds of belonging to a certain social group, religion, ethnicity, or race (Hall, 2013, p. 8). Hence, a law on hate crime intends to combat violence motivated by social, religious, ethnic, or racial belonging. A significant feature of such a hate crime law is that it enhances the punishment for violence as prejudice-motivated (Perry, 2001, p. 12). Unlike hate crimes, hate speech in the legal context is a category of speech that constitutes the criminal as it contains expressions aimed at persecuting another individual on the grounds of racial, religious, ethnic, or other belonging (Waltman & Haas, 2011, p. 4). It dehumanises and defames other individuals or a group of individuals, but what criminalises hate speech is the incitement of discrimination, hostility, and violence (Brown, 2017, p. 419).

Having said that, the expression of hate in the forms of violence or speech has been criminalised in international law and national legal systems. The basis of making manifestations of hate punishable is the principle of equality and non-discrimination between members of society. Equality is a fundamental human right, evident in all human rights documents and protected by law. For instance, the UN Declaration on Human Rights refers to the ‘recognition of the inherent dignity and of the equal and inalienable rights of all members of the human

family' (UDHR, pmb.). This principle is also inherent in European human rights laws and the constitutional documents of every state. In accordance with Article 14 of the European Convention on Human Rights (ECHR) and Article 21 of the Charter of Fundamental Rights of the European Union (CFR), which prohibit discrimination on any grounds, the Member States are obliged to include hate speech and hate crime in their criminal law provisions. This is in line with the principle of complementarity annexed to the 2005 Warsaw Declaration, which commits the Member States to greater integrity and reciprocity of legal texts between the European Union and the Council of Europe (Council of Europe, 2005). Furthermore, EU legislation should provide guidance to the Member States to uphold the standards of combating hate speech and hate crimes set by the ECtHR. With this purpose, in 2008, the EU adopted the Council's Framework Decision 2008/913/JHA on combating certain forms and expressions of racism and xenophobia by means of criminal law. It ensures that 'racist and xenophobic offences are sanctioned in all Member States by at least a minimum level of effective, proportionate and dissuasive criminal penalties' (Council Framework Decision 2008/913/JHA, Art.13).

Though the EU's decision on racism and xenophobia declares all forms of violence and hatred motivated by religion punishable—and, so, it implies anti-Muslim hatred, certain legal complications prevent the implementation of the protection of Muslim immigrants against hate speech and hate crimes. In a broader context, written laws are the basic step to combat hate speech and hate crimes inspired by racism and xenophobia. However, in the report of the European Commission has been stated that protection of the victims of hatred requires greater commitment from the EU and its Member States, such as monitoring and recording of hate speech and hate crimes, an exhaustive investigation of the cases, and all other actions related to law enforcement (European Commission, 2014, pp. 9-10). It has to be underlined that legal infirmity to tackle hate speech and hate crimes impacts human lives. In terms of hate manifestation against people with Muslim origins in Europe, it is individuals who suffer and the well-being of the state and European stability that come under threat. Concerning the significance and complexity of the topic, the research addresses both phenomena of hate manifestation separately to comprehend the obstacles in combating anti-Muslim hatred and their anthropological impacts on the cultural lives of Muslim immigrants.

5.2.1. Legal context of hate crime in the EU and its impact on Muslims

Hate crimes against Muslims do not occur in a vacuum. It is enclosed in the social, political, cultural, and economic aspects of the society that bears the image of Muslims as the ‘primitive others’ of Europe. In fact, this is an aggregation and coherent expression of hate, which starts with prejudices about Muslims and finds its culmination in bias-motivated violence. According to Donald Green and his co-authors, hate crime is a synthesis of different elements related to circumstances of a criminal act, form of conduct, the source of motivation, psychological traits of the perpetrator, and sociocultural construction of targets (Green et al., 2001, 675). With this in mind, when Islamophobic hate crimes occur, the source of motivation of the perpetrator is not only the hatred against Muslims but the conviction that victims are morally and culturally corrupted by reason of their religion or culture so that they are not entitled to the same human rights of equality and non-discrimination as others. This is a decisive aspect of the hate crime, which is coded in the psyches of many. Hence, its psychological trace is not easy to erase, but the law can provide a remedy for it.

As complex general typology of hate crime may be, the counter-actions should be as comprehensive to guarantee the protection of targeted communities and enable them to live together in a culturally diverse society peacefully. A comprehensive policy of combating hate crimes against Muslims means exhausting all possibilities to ensure that people with Muslim origins are safe in the sociocultural field they live in (European Commission, 2018, p.3). From the perspective of the EU, it is predominantly the Member States that are accountable for the legal protection of each individual, including Muslims, against hate crimes. Nevertheless, the EU’s legal policy strategies can impact the dynamic of tackling hate crimes and urge European countries to prioritise it on the national agenda. This is not just a reasonable way, but also a direct obligation of the EU. In broad terms, Articles 1, 10, 21, and 47 of the Charter of Fundamental Rights (CFR) constitute a wide range of individual rights implying respect of human dignity, freedom of religion, prohibition of discrimination (CFR, Art. 1; 10; 21; 47). They contain the principle to seek legal remedy against the violation of these fundamental rights. Provided in Article 67 of the Treaty on the Functioning of the European Union (TFEU), it is in the shared competence of the European Union to ‘constitute an area of freedom, security and justice with respect for fundamental rights’ and to ‘ensure a high level of security through measures to prevent and combat crime, racism and xenophobia’ (TFEU, Art. 67). Also, under Article 6 of the Treaty on European Union (TEU), which provided that the fundamental human rights are the general principles of the community law, the EU should strive to achieve

harmonisation of the national laws of the Member States as regards the human rights, including the measures of combating the hate crime (TEU, Art. 6).

Having said that, as part of its shared competencies in the area of freedom, security, and justice, the EU can make a significant impact on the Member States' anti-hate crime policy, but an analysis of the EU's relevant legal policy revealed that it fails to do so. The key legal issue is that the EU's legal approach constitutes an incomprehensive formulation of duties upon the Member States to tackle hate crimes in their criminal codes. Enclosed in the legal policy framework related to non-discrimination, racism, and xenophobia, the Council Framework Decision (2008/913/JHA) alongside the Victims' Rights Directive (Directive 2012/29/EU) are two legally binding documents upon Member States adopted by the EU. They aim to ensure high-level protection of individuals against hate crimes motivated by racism or other grounds through the measures of a common criminal law approach. The Victims' Rights Directive has established the minimum standards on the rights of individuals to receive support and protection as victims of crime. The Framework Decision obliges the Member States to take actions against it. However, the existing legal documents are not comprehensive and do not cover all aspects of combating hate crimes.

In terms of the Victims' Rights Directive, the EU obliges the Member States to provide the remedy to any individual who claims to be a victim of human rights violation, including hate crimes (Directive 2012/29/EU). The problem is that calling on the Member States to act based on this directive does not automatically guarantee that their legal actions will produce the desired outcome. This aspect also constitutes an initial inconsistency in the legal text of the Council Framework Decision. The Council of the European Union recognised that violent forms of hate expression constitute a threat against targeted individuals and violate the founding principles of the EU, which are liberty, democracy, respect for human rights and fundamental freedoms, and the rule of law (2008/913/JHA, par.1). Hence, intending to combat hate crimes, the EU found it indispensable to develop a common criminal law approach in all Member States that ensures effective and proportionate remedies against racism and xenophobia throughout the EU. However, this initiative does not oblige the Member States to harmonise their national legislation and approximate the EU law. Provision 6 of the Framework Decision provides that 'since the Member States' cultural and legal traditions are, to some extent, different, particularly in this field, full harmonisation of criminal laws is currently not possible' (Council Framework Decision 2008/913/JHA, pr. 6). Harmonisation is a process in the EU by which Member States change their national laws to produce uniformity according to the community law.

Harmonisation of criminal law reduces legal differences between the Member States and achieves the common policy objective of ensuring high-level internal security (Schroeder, 2020, par. I). Therefore, any legal policy initiated by the EU that lacks harmonisation of Member States' national laws cannot be effective and uniform in the European context.

The Treaty of Lisbon has introduced legal approximation in criminal matters; Article 83(2) explicitly confers a shared competence of the EU to harmonise Member States' legislation implying criminal offences and sanctions (TFEU, Art. 83(2)). However, the EU and its Member States are reluctant to comply with it. There are some uncertainties like the constitutional conditions of the Member States, which creates the dilemma of whether this treaty provision exhaustively applies to the EU's power to adopt its community policy on criminal laws (Öberg, 2018). With this in mind, it appears inconsistent with the claimed objective of combating hate crime, when the EU neither initiates the legal approximation in this field nor sets the common basic principles for the Member States on how to respond to any criminal offences motivated by religious, sexual, racist, or xenophobic grounds. The content analysis of the Council Framework Decision revealed that the Council calls upon the Member States to take 'necessary' measures in order to make public violence or hatred based on race, colour, religion, national, or ethnic origin punishable (Art. 1(a)). This means it is up to each Member State to select its measures to punish hate crimes. The EU, in fact, only criminalised the hate crime but did not provide a common standard for the Member States on how to apply it. So, whether Muslims can find a remedy if they become victims of hate crimes is a matter of national criminal laws.

However, this problem is not solely of the EU's legal framework in question. Article 8 of the 2008 framework decision refers to the recognition of hate crimes. It states that the investigation or prosecution of hate crimes should take place based on the circumstances of the crime and should not depend solely on the victim's accusations. This formulation may lead to a twofold interpretation: First, the police will decide whether to start the investigation based on a hate crime or not. In this case, police forces should have enough qualifications to acknowledge the circumstances related to the biased motivation; and second, it raises a problem concerning the reporting of hate crimes. Unless the victim is confident and believes in the criminal justice system's response—that it will be sensitive towards victims' complaints—he/she is unlikely to report such incidents to the police. Therefore, the effectiveness of combating hate crimes by the criminal justice system depends on two factors: the encouragement of victims to report incidents and the qualification of police forces to recognise the possible hate crime and gather proof. Since neither the Council's framework decision nor any other piece of EU law addresses

these issues, it can be concluded that the EU's legal policy approach in combating hate crimes lacks common standards and is rather insufficient. Arguments that strengthen this assumption are provided by the Fundamental Rights Agency (FRA) and the European Commission, discussed below, which found problems regarding the EU approach and the national legal policies in response to hate crimes.

In 2018, the European Union Agency for Fundamental Rights (FRA) drafted a report that analysed the responsibilities of the EU and the Member States towards combating hate crimes (FRA, 2018). The report revealed that making hate crimes punishable is not enough to claim combat against it. The FRA suggested that an initial step to tackle the violent expression of hate is to unmask it. In particular, the EU should adopt legislation collecting and publishing data on hate crimes, which has binding legal effects upon the Member States. Such legal actions foster the acknowledgement of victims of hate crimes, recognise the racist or xenophobic motivations for criminal offences, and sufficiently address the violation of victims' rights (FRA, 2018). Furthermore, the report of the European Commission indicated that the EU lacks relevant legal policy and a common standard to facilitate the combat against hate crime. According to the report, each Member State has different methods or strategies of recording and responding to hate crimes. There are no minimum common standards to define the grounds on which the hate-based offences should be found to be discriminatory (European Commission, 2014). From this follows, the EU has to work further in this direction to refine its legal policy approach in combating hate crimes and adopt a common policy instead of relying on the goodwill of the Member States to cooperate.

Furthermore, the involvement of the European Commission and FRA in improving the policy of combating hate crimes provides for the certain commitment of the EU in this respect. For example, the European Commission monitors the implementation process of the Framework Decision and ensures that Member States address the racist and xenophobic motivation of hate crimes in their criminal codes. In its 2014 report on the implementation of the Council Framework Decision 2008/913/JHA on combating certain forms and expressions of racism and xenophobia by means of criminal law, the Commission addressed the gaps the Member States had in the implementation process and offered some recommendations (European Commission, 2014). Furthermore, the EU High-Level Group on combating racism, xenophobia, and other forms of intolerance—which constitutes a platform for the European Commission, the Fundamental Rights Agency (FRA), and the Member States—fosters the exchange of best practices between national authorities and sets guidelines on combating hate

crimes (European Commission, 2019). Yet, these measures belong to the EU's 'soft policy' actions; they cannot close the existing gaps in its legal policy. To combat the threat of hate crimes requires further commitments from the EU. Till this time, the EU's legal framework only suggests that each EU Member State should individually improve its criminal code to combat all forms of hate crimes. At the same time, the EU has no leverage to influence the Member States to commit them to the EU's guidelines as they are legally non-binding measures. Therefore, the failure of the EU to have in place an effective legal framework that guarantees the protection of all individuals against hate crimes, based on any grounds, creates a certain impact on the lives of Muslim immigrants in the EU.

Recalling the discussion findings on the EU's legal framework on the freedom of religion and non-discrimination in terms of Muslim immigrants, its legal approach towards anti-Muslim hate crimes produces the same outcome. Officially, Muslims enjoy the right to seek remedy against hate crimes on the basis of their religion, but whether they will, in fact, be entitled to it is not guaranteed under EU law. The analysis conceded the following focal points: First, Muslims may rely on the 2008 Council Framework Decision and 2012 Victims' Rights Directive, as they declare any forms of hate crime punishable under the community law, but they did not contain the action plan of the implementation. Second, since there is no clear guidance as to what the grounds are to establish a biased motivation for hate crimes against Muslims within the legal context of the EU, it rests upon the Member States to decide on the method and conditions of criminalisation.

Having said that, an actual problem is not that the EU does not have a law that protects Muslims against hate crime, but whether that law will be implemented occasionally to defend them. For instance, in 2018, in Warsaw, Turkish men were abused on a bus based on their religious identity. Though they reported the hate crime immediately, police did not start an investigation based on the 2008 Council Framework Decision prohibiting religious discrimination. They found there was no sufficient ground to assume that this incident had a motive of religious hatred (Cuper, 2019, par. 2). Hence, if there is no clear guidance on hate crimes adopted by the EU that legally obliges the Member States and its institutions to comply with its laws, then there is no guarantee that Muslims will find a remedy for the hate crimes against them. This eventually constitutes a vicious circle, in which a lack of protection against hate crimes at the national level conditions the need for actions at the EU level, but the EU cannot make a change since the Member States do not make the necessary legal commitments. Such a circulation of legal power between the EU and its Member States may be a reasonable

excuse in the field of legal analysis, but from the anthropological perspective, it produces a reverse effect on European Muslims living in European societies. It not only discourages them from seeking remedy for hate crimes but also causes their marginalisation.

Similar to the EU's legal policy insufficiency in combating anti-Muslim hate crimes, which indicates the flaws in the relevant EU legal framework, the same problems exist in the EU context regarding hate speech against Muslims.

5.2.2. Combating anti-Muslim hate speech in the EU legal system

Anti-discrimination laws that prohibit any form of manifestation of hatred based on race, ethnicity, religion, sex, etc. are indeed an essential means to protect human dignity and promote equality in modern Europe, which is guided by the principles of liberal democracy (Weinstein, 2017, p. 715). In line with this, the legal standard of combating all forms of expression of hate and, in particular, on the ground of religion is essential for Muslim immigrants who struggle to integrate into the European societies as they encounter anti-Muslim hatred in their everyday lives. Frequently, they experience verbal abuse, hostility, and dehumanisation, which constitutes hate speech against Muslims (Bayrakli & Hafez, 2019). In this respect, a general legal framework of the EU and its Member States on combating discrimination provides legal protection for the victims of hate speech. EU legal provisions discussed earlier regarding hate crimes also provide the legal basis to seek remedies against hate speech. For instance, the Council Framework Decision 2008/913/JHA declares all forms of hate expression motivated by racism and xenophobia punishable and lists religion among the grounds of hatred. This also indicates that the flaws of the Council Framework decision discussed in reference to hate crimes, implying the non-uniformity of law and its enforcement, remain a problem of combating hate speech in practical terms. However, tackling anti-Muslim hate speech has further problematic aspects, which have not been addressed in the discourse of hate crimes. This questions whether the EU law prohibiting hate speech guarantees that every individual who resides in the territory of the EU and claims to be a victim of such a violation will find a remedy.

The primary problem arises with respect to the practical definition of what constitutes hate speech. The EU defined hate speech as public incitement to violence or hatred directed against a group of persons or its particular members (Council Framework Decision 2008/913/JHA, Art.

1). Such a conceptualisation is not exhaustive and leaves much space for interpretation. Recalling the discussion in the second chapter about differences between Islamophobia and anti-Islam criticism, it has to be assumed that what the Muslim communities believe to constitute a hate speech may do not receive the same legal interpretation within the EU legal system. In Article 7 of the Framework Decision, the EU emphasised that the prohibition of hate speech should not have any effect on the other fundamental rights and legal principles, such as freedom of expression and association (Council Framework Decision 2008/913/JHA, art.7). Furthermore, Article 11 in the Charter of Fundamental Rights (CFR), which corresponds to Article 10 in the European Convention on Human Rights (ECHR), guarantees the right of freedom of expression. It states:

‘Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers’ (CFR, Art. 11).

Following this, the prohibition of hate speech does not protect Muslims from all forms of expression that may abuse their religious feelings in the name of free speech. Furthermore, the effectiveness of combat against hate speech relies on the acknowledged boundaries between hate speech and freedom of expression.

It is not arguable that free speech is a key European value and a fundamental human right, but, according to some scholars, such as Jeremy Waldon, Jeffrey Howard and Sandra Coliver, it should not have priority over the value of toleration and the rights of human dignity and security. Freedom of expression cannot justify hate speech that promises discrimination and exclusion to others. According to Waldron, what makes hate speech a crime is not its cause of harm but that it constitutes harm. Hate speech degrades individuals and spreads prejudice based on race, ethnicity, nationality, or religion (Waldron, 2012, p. 5). In the opinion of Howard, if the moral right to freedom of expression exists, there is also a moral duty not to incite hatred, not to harass, offend or defame (Howard, 2019, p. 93). Coliver emphasised that the balance between free speech and prohibition of hate speech should remain. She questioned: ‘If the weights on the balance favour free speech, is the metaphor of balance appropriate?’ (Coliver, 1992, p.1). In response, Coliver argued that freedom of speech does not mean freedom of spreading false information and prejudice (Coliver, 1992, p.1). From this perspective, the EU legal standard should guarantee that free speech does not mean prejudicial denouncement of Islam or Muslims; and no hate speech should affect the everyday life of Muslims. Though EU law prohibits hate speech and declares it punishable, the fate of victims who intend to receive

protection from hate speech should not depend on the shifting boundaries of where the limit of free speech is and where the crime of hate speech starts. Furthermore, from the perspective of the scholarly discussions, which concern anti-Islam bigotry, it seems inconsistent to punish hate expression towards individual Muslims and, on the contrary, declare the mocking of the Prophet Muhammed or the Holy Koran as freedom of expression (Byrd, 2017; Sayyid, 2014; Vakil, 2010). In the end, whether hate speech targets Muslims or, in general - Islam, it has the same impact of spreading prejudices, abusing Muslim dignity and threatening public security. For illustration, the events of Paris in 2015 surrounding the caricature of Prophet Mohammed proved how much damage it may cause when individuals are entitled to denounce and humiliate Muslim religious beliefs under the guise of free speech. Thus, the problem of remaining balance when free speech clashes with hate speech and the non-punishable character of mocking Islam are debatable. However, an overview of the court decisions in the EU Member States since 2012, which are recorded in the database on anti-Muslim hatred, established by the EU Fundamental Rights Agency, indicated that in most cases, any expression of verbal abuse against Muslims on a religious basis had received the qualification of hate speech at the EU and the national courts (FRA, 2016).

It would be a misconception to claim that every form of expression may qualify as illegal hate speech, but neither do all kinds of expressions enjoy the absolute right of free speech in any legal system. In fact, if the right to free speech may limit the prohibition of hate speech, then, in the reverse correlation, a ban on hate speech also puts the limits to free speech. An elucidation of it is the non-absolute character of the free speech inherited in the European Convention. It provided that freedom of expression—since it contains duties and responsibilities—may become the subject of restrictions to prevent crime or protect the morals, reputation, and rights of others (ECFR, Art. 10). With this in mind, unlawful hate speech, which presents a risk or imminent danger to public safety or violates other human rights, should be restricted and punished. Hence, if a certain pattern of speech promotes violence or dehumanises other persons and constitutes unlawful hate speech, it cannot enjoy the moniker of ‘freedom of expression’. This legal principle has been developed through the case-law of the European Court of Human Rights (ECtHR) in its several rulings, such as *Vejdeland and others vs. Sweden* (2012) and *Fáber vs. Hungary* (2012), which draw boundaries between free speech and illegal hate speech. This has a particular significance for the EU since it is responsible for upholding human rights standards established by the ECtHR in its Member States. Therefore, the EU cannot oversee the rulings of the ECtHR on hate speech and freedom of expression. However, it is the legal nature of the EU to establish its own standard of free speech based on the case-

law of ECJ. The European Court of Justice (ECJ) limited free speech to that extent to combat the proliferation of hatred, discrimination and dishonouring of individual dignity. Its 2019 decision in the case of *Eva Glawischnig-Piesczek vs. Facebook Ireland Limited* established that hate speech is punishable not only if it encourages something unlawful but also if it contains the abuse of human dignity. As an answer to the preliminary ruling from the *Oberster Gerichtshof* (Supreme Court) of Austria, which referred to deletion of abusive comments on the social media site Facebook, the Court established that Facebook could be forced to delete posts or comments if the content was defamatory or illegal (Case C-18/18). Though some may argue that this decision endangered the right to freedom of expression, it clearly contained the approach that the EU does not welcome any elements of hate speech and encourages Member States to combat it. Earlier, in 2016, the Commission agreed with Facebook, Microsoft, Twitter, and YouTube on a 'Code of conduct on countering illegal hate speech online', which means that when IT companies receive requests that published content is illegal, they are committed to review the request in less than 24 hours and remove the content, if necessary (European Commission, 2018). This rule is applicable in the broad context to any form of hate speech against any individual, which means hate speech against Muslims is also covered under the law.

Having said that, at a certain degree, the EU law creates a protective environment for Muslims in which they can manifest their cultural and religious identity. If they become victims of hate speech, the legal standard in the EU and its Member States provides that the perpetrator will be prosecuted and will receive reasonable punishment. For example, on September 12, 2015, during a football match, a Polish man used a loudspeaker to publicly insult Muslims. He also called upon other football fans to sing a song about Muslims, using words commonly considered abusive (FRA, 2016). The Court of Poznan, in the first instance, established incitement of violence or hatred. The accused was sentenced to seven months of imprisonment and 20 hours of community work every month during this period (FRA, 2016). Hence, in terms of hate speech, the EU law and relevant national laws find practical applicability to Muslims, which positively affects their cultural life in European societies. However, it is significant to note that if combating illegal hate speech is effective at the EU community level, this is because of the national laws. After the analysis of the FRA database on the court cases of hate speech, the research revealed that national courts, in most cases, do not rely on the EU directive but the national law in the process of adjudication (FRA, 2016).

To sum up, the EU in the Framework Decision 2008/913/JHA on combating certain forms and expressions of racism and xenophobia by means of criminal law declared hate speech

punishable. It appears that the Member States met their legal commitment and—in many cases—Muslims can find a remedy against hate speech. At this point, the relevant legal framework of the EU, in cooperation with the national laws, acts as a mechanism of combating Islamophobia and complies with the principle of multiculturalism. Nevertheless, this particular finding cannot outbalance the previous results of the legal analysis. Whether the EU's approach towards Muslim immigrants' cultural integration and combating Islamophobia follows the model of multiculturalism remains questionable in the general assessments.

5.3. Final assessments of the EU legal policy approach to combat Islamophobia and promote Muslim immigrants' cultural integration

This chapter's primary goal was to analyse the effectiveness of the EU's legal framework on human rights protection and describe the kind of reference it takes to the Muslim cultural freedom and combating Islamophobia in the wider, one may say, anthropological context. The subject of analysis was the EU law on freedom of religion and non-discrimination and the ban on hate speech and hate crimes, as they can have a tremendous effect on individual human life. These constitute the legal policy measures that shape the cultural life of Muslim immigrants in European societies. Therefore, the extent to which the EU legal framework upholds the freedom of Muslim religious liberty, protects them against discrimination based on their religious identity, and prohibits anti-Muslim hate speech and hate crimes, facilitated an understanding of the EU's approach towards the cultural integration of Muslim immigrants and in combating Islamophobia. It provided incentives to single out the model of cultural integration that the EU's legal policy favours.

In line with this, the analysis revealed that in the legal context of the EU, Muslim immigrants and minorities enjoy the same cultural rights and freedoms as all other individuals. Freedom of religion and non-discrimination is guaranteed under the Charter on Fundamental Rights of the European Union (CFR, art.10). Furthermore, in 2000, the EU adopted two directives in the field of non-discrimination, which affect the lives of European Muslims. Council Directive 2000/78/EC bans discrimination at work on the grounds of religion or belief, disability, age, or sexual orientation (Council Directive 2000/78/EC, art. 1). However, Council Directive 2000/43/EC implementing the principle of equal treatment between persons irrespective of racial or ethnic origin bans discrimination on the grounds of race and ethnic origins only and

indicates that Muslims cannot find a remedy for religious discrimination in other areas of a social life than employment-based on community law (Council Directive 2000/43/EC, art.1).

Moreover, in the field of hate speech and hate crimes, the EU law comprises Council Framework Decision 2008/913/JHA, which declared all forms of hate expression motivated by racism and xenophobia punishable (Council Framework Decision 2008/913/JHA, art.1). In addition, the Victims' Rights Directive 2012/29/EU established a minimum standard on the rights of individuals to receive support and protection as victims of crime (Directive 2012/29/EU, art.1). These laws may not explicitly refer to Muslims, but they protect all individuals' cultural rights, so they include Muslim immigrants as well. In this sense, the EU's legal framework provided a basis for multiculturalism, in which Muslims can practise their religion and culture. Furthermore, the law prohibiting discrimination on religious grounds and banning hate speech and hate crimes against Muslims supports the campaign against Islamophobia. Nevertheless, whether the EU's legal framework indeed delivers such results for Muslim immigrants in practical terms depends on the applicability of those laws. In this respect, the analyses led to different findings.

In the component of freedom of religion and non-discrimination, the EU's legal framework does not function to ensure the full cultural freedom of Muslims residing in the EU. A range of EU legal derogations and the case law prevents unlimited enjoyment of Muslim religious liberty. The cases of Ms. Achbita, Ms. Bougnaoui, IX and MJ illustrated that the EU aims to uphold certain legal standards that protect European values and national norms of the Member States (Case C-157/15; Case C-188/15; Case C-804/18; Case C-341/19). If an expression of Muslim religious and cultural identity does not confront those values, then the law guarantees freedom of religion and non-discrimination to Muslim immigrants, but the national constitutional values prevail in conflicting situations. As a result, Muslims enjoy religious freedom to different extents in the different EU Member States. for example, in France, Muslims are not free to wear religious symbols at school, at the university, or workplaces, concerning secularism. A Muslim woman who refuses to obey the principle of secularism because it prevents her from following Muslim religious traditions has to quit and isolate herself. To put a legal analysis aside and observe this case from the anthropological perspective, it produces an assimilationist pattern of cultural integration. The role of the EU in this process is to guarantee the cultural freedom of Muslims to the extent that it fits in the cultural traditions of the Member States. In this sense, such a legal policy approach does not fully favour multiculturalism, but neither is entirely assimilative because Muslim immigrants do enjoy a

certain degree of cultural freedom under the existing legal framework. Recalling the theories of cultural integration, the model between assimilation and multiculturalism constitutes hybridisation (Algan et al., 2012; Stockhammer, 2012). Therefore, Muslim immigrants who under the EU law can enjoy their religious liberty to a certain degree, which complies with the cultural traditions that the Member States uphold in their national constitutions, undergo the process of hybridisation. It does not confront the Islamophobic violations of Muslim cultural rights but does tolerate certain forms of institutional Islamophobia when it comes to the prohibition of Muslim religious symbols under the constitutional laws of the Member States. Furthermore, the component of hate speech and hate crimes against Muslims strengthen the incentives for such an assessment.

The EU provided the legal framework to protect Muslims against hate speech and hate crimes (Council Framework Decision 2008/913/JHA). In terms of prohibiting hate crimes, delivering an effective remedy for Muslim immigrants is questionable as the Member States are reluctant to implement the law fully (European Commission, 2018). This indirectly produces a negative impact on the core principle of multiculturalism, which is to guarantee the protection of culturally different groups. In contrast to this, the EU legal framework and the commitments of the Member States also ensure that in practical terms, the remedy can be found against anti-Muslim hate speech. Conflicting results in the legal analysis of banning hate speech and hate crimes facilitates the thinking that despite a problem of practical implementations, the EU's legal approach is to protect Muslims and any other individual against incitement and manifestation of hatred. This also constitutes a legal mechanism for combating Islamophobia. Arguably, such an approach of the EU in general terms indicates that it predominantly strives to protect its institutional values and the image, which follows the values of the western European societies; the question of Muslim cultural freedom then arises (Khan, 2020; Xenidis, 2018). In other words, the legal framework of the EU is not designed to embrace Islam and Muslim culture in European multiculturalism but grant them that degree of protection of their cultural traditions so that the western European and universal principles of fundamental human rights protections are upheld. Beyond this, it becomes evident that Muslims are obliged within the EU legal system to modify their religiosity and cultural customs to the Western constitutional traditions of secularism.

Hence, on the one hand, the EU offers a basis to combat Islamophobia in the legal context, but this legal mechanism is not as effective as it should be. Perhaps, this sounds like a subjective assessment, but the gap in the EU law indicates that there is more space for the EU to apply the

legal instruments against all forms of Islamophobia and ensure their applicability in practical terms, which it fails to do. On the other hand, the study of the legal framework of the EU—which implies the cultural rights of Muslims residing on its territory—indicates a legal standard that, at the fundamental level, prohibits hate speech and hate crime and guarantees religious liberty and non-discrimination of European Muslims, as long as they comply with the western principle of secularism. Any individual expression of Muslimness that confront the idea of secularism remains limited under the community law on the grounds of derogation to respect the constitutional tradition of the Member States, which, in fact, is designed to protect the western European tradition of constitutional secularism. Therefore, recalling the discussion about the conflict of Muslim religiosity and western secularism introduced in previous chapters (Freedman, 2004; Jansen, 2013; Rectenwald, 2016), this could be interpreted as an attempt at secularising European Muslims.

So, as a primary assessment, the legal policy of the EU can be considered an attempt at Muslim cultural hybridisation. As described in the chapter of methodology, this thought has been framed through the analytical study of the EU treaty provisions and legal documents being the main sources of the EU law, addressing the religious liberty of Muslims, their non-discrimination, combating anti-Muslim hate speech and hate crime. The documents were obtained from the EU official journals, the Eur-Lex page that offers access to EU laws and EU case laws, the EU official web page, and the web page of the European Commission.

However, the analysis of the EU's role in the cultural integration of European Muslims and combating Islamophobia should not be limited to legal aspects because, as discussed in the following chapter, the EU may also influence the Muslim cultural integration and combating Islamophobia through the 'soft policy' (Peters, 2011; Wallace & Wallace, 2000). Following the research methodology, a comprehensive study of the EU's approach towards Islamophobia and European Muslims rest upon its legal and 'soft policy' analysis.

Chapter VI. ‘Soft policy’ of the European Union towards cultural integration of European Muslims and in combating Islamophobia

The term ‘soft policy’ of the EU in this dissertation refers to the verity of the EU measures apart from the ‘hard laws’, which produce direct or indirect effects on combating Islamophobia and facilitating the cultural integration of European Muslims. Primarily, it comprises ‘soft laws’—the non-binding policy measures, defined by the Treaty on the Functioning of the EU as EU guidelines, opinions, recommendations, and declarations (TFEU, Art. 288). However, the EU possesses another mode of governance, which is more intergovernmental, informal, and lacks the hierarchy of policy instruments to launch different programmes or platforms oriented at sharing the best practices on combating Islamophobia among the Member States, empowering the victims of anti-Muslim discrimination, and raising awareness about Islamophobia and cultural diversity with the help of the civil sector and main stakeholders (Peters, 2011, p.19). This mode of policymaking is described as relatively new in the scholarly approximations, but after the Maastricht treaty entered into force, the soft regulatory mechanism has been significantly developed at the EU level, which produces policy impact as it encourages the Member States to voluntarily carry out certain measures which they would be less willing to do if legally obligated (Christiansen & Piattoni, 2003, p. 4). Though EU soft policy initiatives do not create a legal obligation on the part of the Member States, they have to respect and consider it in the process of national policymaking. In this sense, the EU’s ‘soft policy’ component has a crucial role in studying the EU’s policy approach towards the cultural integration of European Muslims and in combating Islamophobia. Unlike the EU’s hard law-making competence, its soft policy powers are not restrained; whether or how it is applied in terms of combating Islamophobia as well as supporting Muslim cultural integration opens the door for assessments of the EU policy. With this in mind, the research involved a process of data collection in the field of EU ‘soft policy’ based on the sources of Eur-Lex, EU official journals, the EU official webpage, and the webpage of the European Commission, which led to contested findings in terms of Islamophobia and Muslim cultural integration.

6.1. ‘Soft policy’ of the European Union towards combating Islamophobia

As mentioned several times, Islamophobia constitutes a critical question at the EU institutional level. Since 2001, though the European Monitoring Centre on Racism and Xenophobia

(EUMC), from 2017 known as the European Union Fundamental Rights Agency (FRA), has studied and periodically published reports on Islamophobia in the EU Member States, in which it has urged the EU to take effective measures for combating Islamophobia (EUMC, 2001; 2006), till the present, the EU and its main institutions remain reluctant to address this challenge in a proper manner as the relevant policy actions are not evident at the EU institutional level. The problem of Islamophobia is on the policy agenda of the EU, but it appears that the EU does not have any 'soft policy' mechanism at the community level to tackle it or encourage the reluctant Member States into addressing this challenge. Apart from the general legal framework on fundamental human rights and prohibiting discrimination, the research revealed that no piece of EU 'soft law' has referred to this topic and recommended a potential measure in response to this increasing challenge. A sole reference to anti-Muslim hatred has been made by the European Parliament in its resolution about fundamental rights and the rights of minorities and called upon member states to strengthen the legal basis of combating hate speech, hate crimes, and discrimination against Muslims (European Parliamentary Research Service, 2018). The fact that EU did not develop a 'soft law' instrument in this respect indicates policy inaction, according to the theory of Allan McConnell and Paul Hart, who defined it as 'an instance and/or pattern of non-intervention by individual policymakers, public organisations, governments or policy networks in relation to an issue within and potentially within their jurisdiction and where other plausible potential policy interventions did not take place' (McConnell & Hart, 2019, p. 649). Furthermore, following this theory, 'doing nothing' is also a policy; therefore, the reluctance of the EU to adopt a 'soft law' in terms of Islamophobia leads in the current research to three possible findings: First, the EU does not acknowledge the threat of Islamophobia and does not plan to formulate relevant policy measures. Second, the EU acknowledges the threat of Islamophobia but does intend to adopt policy measures against it. Third, the EU acknowledged the threat of Islamophobia and is in the process of drafting policy measures to combat it. The last one seems a rather plausible assessment of the EU's 'soft policy' in terms of combating Islamophobia, considering the related policy steps taken by the European Commission. For example, in 2015, the European Commission appointed a coordinator to combating anti-Muslim hatred, who has a responsibility to bring together actors of civil society and main stakeholders with the purpose of tackling anti-Muslim discrimination and hatred (European Commission, 2019). In addition, the European Commission launched a platform to share the best practices of combating anti-Muslim hatred among the Member States. It hosts annual conferences and working groups to develop a set of guidelines to cope with this challenge (European Commission, 2019). However, whereas the Fundamental Rights Agency

raised the alarm in the EU about the threat of Islamophobia in 2001, the fact that the Commission launched working groups on this topic only a decade later points out the belated response to it. Furthermore, the process of drafting a 'soft policy' against Islamophobia has a peculiarity insofar as it cannot produce the policy effect in this respect. Eventually, the belated reaction of the EU resulted in the outcome that its institutions involved in policymaking, viz. the European Commission, the European Parliament, and the Council of the European Union, did not address the merit of Islamophobia conceptualised by prominent scholars. The term 'Islamophobia' has not even been established in the official EU documents. An overview of the wider range of EU policy papers revealed that the concept of Islamophobia is being replaced by the terms 'anti-Muslim hatred' or 'anti-Muslim discrimination'. According to this method of content analysis, which pays significant attention to the political language of the text within the official documents, the absence of the term 'Islamophobia' in the wording of the EU indicates that it either denies this term or has not conceptualised it yet (Grimmer & Stewart, 2013). The possible antagonism towards the term 'Islamophobia' may become a cornerstone of relevant EU 'soft policy' assessments as there are also certain scholarly dissensions with this respect. There are some authors who do not favour the term Islamophobia and prefer to call it 'anti-Muslimism' or, simply, racism against Muslims (Halliday, 2010; Joppke, 2009; Kenan, 2005). Fred Halliday claims that Islamophobia is about Muslims and their negative stereotyping, so 'anti-Muslimism' would be a more appropriate concept to describe the negative attitudes towards Muslims as they are the subject of hatred and not Islam (Halliday, 2010, p. 892). Christian Joppke questions the term Islamophobia and argues that it is a mechanism for Muslim minorities to 'quest for respect and recognition' in western societies (Joppke, 2009, p.453). According to Maleiha Malik there is no such thing as Islamophobia, and only anti-Muslim sentiments exist (Malik, 2009, p. 208). In contrast, a group of scholars insists that Islamophobia, like anti-Semitism, deserves its name because this phenomenon goes beyond hatred or racism against Muslims and implies the various forms of bigotry against Islam (Meer & Madood, 2010; Sayyid, 2014). Since scholarly debates about Islamophobia are divided between protagonists and antagonists of the term 'Islamophobia', the EU must reveal its stand in this respect to start working on defining the merits of Islamophobia.

However, it is more plausible to assume that the EU has not adopted a practical definition of this concept, and, hence, it is an official term that has not been established in the EU policy documents. This assumption rests on the factual circumstance that the European Commission initiated, first in 2019, to bring together experts, international organisations, and national authorities to adopt a working definition of Islamophobia and find effective ways of combating

it (European Commission, 2019). Following this, the draft report of the seminar on a working definition of anti-Muslim hatred/Islamophobia stated that Islamophobia refers to human rights violations, the racialisation of Muslims, perceived identity of ‘Muslimness’, creation of the Muslims as ‘the other’ (FRA, 2020, p.4). Interestingly, this document is not available any more on the official page of the FRA. Although the commitment of the working group gave hope that in the nearest future, the EU could adopt a working definition of Islamophobia and evolve a policy to tackle it in its entire scope, till this time, it remains a critical matter as to how reluctant the EU is to carry out a prompt and effective response to this challenge.

Nevertheless, it would be false to argue that the EU is entirely negligent to the issue of anti-Muslim hatred. Within the framework of combating racism, the European Commission initiated an action plan, which contains measures against Islamophobia. It stated:

‘There are different forms of racism, such as anti-black racism, antigypsyism, anti-semitism and anti-Asian racism, that link to religion or belief in cases such as anti-Muslim hatred. All share the reality that the value of a person is undermined by stereotypes based on prejudice (European Commission, 2020, p.2).

Such a reference indicated that until the EU adopts a working definition of Islamophobia and supposedly address it separately in its policy papers, this problem remains on the EU agenda within the framework of anti-racism policy. In this sense, the anti-racism action plan encourages the Member States to strengthen the legislation and its enforcement against anti-Muslim racism and ensure the combat against racism on the local level by awareness-raising programs and tackling disinformation in media. The role of the EU, with this respect, is to offer its financial and informational support to the Member States (European Commission, 2020, p.13). Though the measures against racism imply combat of Islamophobia as well, the problematic aspect of this approach is that Islamophobia goes beyond racism and as scholarly assumptions suggest, broadening the policy scope complicates effective response to all forms of Islamophobia (Cheng, 2015; Lauwers, 2019; Sayyid, 2014). In addition, even within the context of anti-racism policy, the responsibility of actual policymaking rests upon the Member States, which on the one hand ensures a possibility of tailor-made policy response at the national level, but on the other hand, undermines the role of the EU and a possibility of the common European response to this problem.

Hence, the assessment is that the EU’s policy to combat Islamophobia lacks the component of ‘soft law’ and is limited to the indirect reference to its legal remedy contained in the general legal framework of the EU, implying the combat of racism and xenophobia. However, such a

legal framework makes certain forms of Islamophobia punishable but does not constitute prevention of anti-Muslim hatred. By the suggestion of the European Commission, raising awareness about Islamophobia, increasing official recognition of this phenomenon, and empowering victims of Islamophobia remains the responsibility of the Member States. The anti-racism action plan suggested by the EU has a symbolic character and thereby does not produce a significant impact on the elimination of Islamophobia. At the same time, a reference to the anti-Muslim racism in the action plan is an incentive to describe the role of the EU towards combating Islamophobia as it is in the ongoing process of soft policymaking. Nevertheless, combining the legal and ‘soft policy’ aspects of the EU approach towards coining the concept of Islamophobia leads to the critical assumption that the EU is not a successful player in combating Islamophobia because it narrows down the conceptual merit of this phenomenon.

6.1.1. Conceptual negligence over Islamophobia at the EU institutional level

Over the last decades, scholars of Islamophobia raised the alarm about the need to give a conceptual definition and a proper name to the multitudinous acts of hostility against Muslims and Islam. Selman Sayyid and Erick Bleich addressed the significance of naming Islamophobia to enable the analysis of violence and discrimination directed at Muslims (Bleich, 2012; Sayyid, 2014). In this context, it is interesting to note that the term ‘Islamophobia’ is mostly absent in the European Union (EU) policy documents related to the topic and that there is vagueness around its conceptualisation.

Though some may argue that semantics and conceptualisation are not as important as actual policy actions against Islamophobia, the latter are unlikely to make an efficient policy step towards combating this challenge without proper terming and a working definition (Allen, 2017, p. 2). In this sense, if naming Islamophobia is significant, not naming Islamophobia should also receive a name. Interestingly, mentioned in the literature review, the question regarding the concept of Islamophobia at the EU institutional level was already addressed in 2010 by Chris Allen in his book ‘Islamophobia’ (Allen, 2010). Later in 2017, he again denoted the problem of coining the concept of Islamophobia in the EU policy discourse (Allen, 2017). The current research indicated that the vagueness towards the concept still exists at the EU level. As a result of analysis of the EU legal and non-legal policy documents, this dissertation reached to the assumption of conceptual negligence over Islamophobia at the EU institutional

level. However, conceptual negligence is not an easy concept. Negligence is defined as ‘not giving enough care or attention’ (Cambridge Dictionary, 2016). Nevertheless, conceptual negligence over Islamophobia at the EU institutional level has more complex merit than a lack of attention. It implies disregarding the valid category of Islamophobia, disfiguring its conceptual understanding and not naming what has to be named. For the elucidation, the dissertation lists seven grounds that support such an assessment:

The first factor that facilitates this assumption refers to disregarding the 2001 and 2006 reports on Islamophobia by the EU policymaking Institutions, as discussed earlier. The European Union Agency of Fundamental Rights (FRA), formerly known as the European Union Monitoring Centre on Racism and Xenophobia (EUMC), described in its reports increased Islamophobic reality in the EU member states (EUMC, 2001; 2006). Amongst other responsibilities, it is the task of the FRA to provide evidence-based advice on fundamental rights and suggest a mechanism for reflecting it in the EU policy (Council Regulation (EC) No 168/2007). Therefore, EUMC recommended that immediate action should be taken at the EU level against Islamophobia in its two reports. However, the EU disregarded the two appeals for immediate action, as no policy formulations at the EU institutional level were evident on this subject. The reports of EUMC about Islamophobia have a twofold significance for elucidating the negligent attitude of the EU towards this category. Besides awakening the attention of the EU to a new challenging threat, it gave this phenomenon the name of Islamophobia. So, two decades ago, the EU had received information from its agency about the phenomenon and the term that merited it, not to mention the scholarly commitments to recognise Islamophobia as a valid category. Nevertheless, the concept has not yet been coined in the EU policy and in the political language. Thus, it is rational to describe as conceptual negligence the choice of the EU to do nothing about it. However, in recent years the EU had greater awareness about the challenge of Islamophobia, but it was yet to describe the phenomenon using the right term. The negligence on the part of the EU to do so brings up the second ground.

Another argument for thinking of conceptual negligence refers to deploying several alternative terms to name Islamophobia. Scholars emphasise that the political discourse about Islamophobia has become more imprecise in modern times as it is conceptually equated with populism, right-wing extremism and racism (Kolankiewicz, 2019; Meret & Gregersen, 2019; Mulhall & Kan-Ruf, 2021). How the EU addresses the concept of Islamophobia bears a resemblance to this trend. In 2015, the European Commission created the position of ‘Coordinator on combating anti-Muslim hatred’, and one year later European Commission

launched ‘High Level Group on combating Racism, Xenophobia and other forms of Intolerance’ which overlapped the category of human rights violations against Muslims on the basis of religion (European Commission, 2019). By means of discourse analysis, it appears that the category of Islamophobia does not exist. The human rights violations against Muslims are categorised under ‘Racism, Xenophobia and other forms of Intolerance’, or it is dubbed anti-Muslim hatred. On this basis, it is plausible to argue that EU is aware of Islamophobia, but it is not determined to use this term and to avoid conceptual ambiguity. However, equating the terms such as anti-Muslim racism, anti-Muslim discrimination, or anti-Muslim hatred with Islamophobia shrinks the conceptual understanding of the phenomenon.

Narrowing down the concept of Islamophobia represents the third ground for thinking of conceptual negligence. Though the policy approach of the EU towards Islamophobia is at some point vague, it is evident that the policy formulation in this regard does not go beyond discrimination and hatred. For illustration, as discussed in the previous chapter on the EU legal framework, in 2000, the Council adopted the Racial Equality Directive, which banned direct or indirect discrimination on the racial and ethnic basis in accessing public good and social services but did not include the ground of religion (Council Directive 2000/43/EC). In the same year, another Directive was adopted prohibiting discrimination in employment and occupation, which contained the aspect of religious discrimination (Council Directive 2000/78/EC, 2000). This indicated that the EU addressed discrimination of Muslims on a religious basis in the area of employment, but Muslims could not find a remedy against discrimination in other aspects of social life. Some years later, the EU adopted the Framework Decision 2008/913/JHA on combating certain forms and expressions of racism and xenophobia by means of criminal law (Council Framework Decision 2008/913/JHA). This piece of law declares all forms of hate expression motivated by racism and xenophobia punishable and lists religion among the grounds of hatred. Following this, anti-Muslim hate speech and hate crimes are punishable, but as a category of racism or xenophobia. Thus, the EU omitted religion from the racial equality directive but listed religious hate speech and hate crimes amongst the forms of racism and xenophobia. Such a policy formulation indicated that there are certain forms of Islamophobia that remain beyond the EU's consideration.

The categorisation of Islamophobia by Runnymede Trust has been slightly reconsidered by Sayyid, who has named five categories of activities described as Islamophobia, such as physical violence towards Muslims or individuals perceived as Muslims, their intimidation and discrimination, attacks on the property linked to Muslims and disparaging Muslims or Islam

(Sayyid, 2014, pp.15-16). However, in the words of Sayyid, 'the repertoire of Islamophobia' is broader than discrimination and hatred (Sayyid, 2014, p.15). As discussed in the literature review, in 1997, the Runnymede Trust named four main aspects of Islamophobia: First, exclusion of Muslims from politics and government, employment, management and responsibility; second, discrimination of Muslims in employment, health and education services; third, prejudice about Muslims and Islam in media and everyday conversation; fourth, violence against Muslims in forms of physical abuse, verbal abuse and vandalising property (Runnymede Trust, 1997, p.11). While many scholars subscribe to this categorisation, they specify that it is not only Muslims but individuals perceived as Muslims who become the victims of Islamophobia (Allen, 2010; Bleich, 2011; Halliday, 2010). Contrary to this, the EU law only provides for the protection of Muslims against hate speech and hate crimes and prohibits their discrimination in the field of employment. Leaving other forms of Islamophobia beyond its conceptual understanding, such as the exclusion of Muslims from politics, their discrimination in healthcare and education or disparaging Islam, points to the EU's lack of commitment to the concept of Islamophobia. This also indicates that the EU does not place hostility against Islam in the centre of its understanding of Islamophobia, which provides additional ground for reasoning.

The remaining silence on anti-Islam bigotry is the fourth and most significant aspect. The merit of Islamophobia is debatable, but by incorporating different scholarly assumptions it leads to two main controversial postulates: Islamophobia is about Islam and Muslims (Allen, 2010; Assad, 2003; Sayyid, 2014; Lauwers, 2019), or it only implies Muslims (Halliday, 2010; Runnymede Trust, 2017). However, suppose there is no such thing as phobia against Islam and Muslims are the target of hatred and racial hostilities. In that case, there are certain acts of Islamophobia, such as coining Islam as a religion of evil, mocking prophet Mohamed or diabolising the Koran, which remain unnamed and unrecorded. However, as discussed earlier, it is debatable what differentiates anti-Islam bigotry from the criticism of Islam. Some scholars argued that secular criticism of Muslim religious practices should not be discouraged under the name of Islamophobia (Elman, 2019; Imhoff & Recker, 2012). On the contrary, others suggested that the final assessment of anti-Islam bigotry and anti-Islam criticism should be based on the prejudicial portrayal of Muslims and Islam (Heyder & Eisentraut, 2016; Vakil, 2010). Thus, despite its contested character, there are boundaries beyond which negative assumptions about Islam is anti-Islam bigotry and not a rational criticism. In line with this, it appears that the EU does not consider disparaging Islam in the understanding of Islamophobia, and the aspect of anti-Islam bigotry is out of the EU policy scope. For example, though a range

of activities was promoted on the theme of 'Islam, Christianity and Europe' by the European Union during 2008 as the 'European Year of Intercultural Dialogue', the problem of anti-Islam bigotry was not included there (European Commission, 2006; 2010). The EU also remained silent on the anti-Islam demonstrations in Germany, France, Sweden, and Norway over the last few years. In addition, advancing the term anti-Muslim hatred at the EU institutional level proves that hostility against Islam does not concern the EU. Furthermore, the 2019–2020 motions for a resolution of the European Parliament address the topic of radical Islam and political Islam, but not a single initiative exists regarding the status of Islam in the EU (Garraud, 2019; Kofod, 2020). Thus, it becomes evident that the EU has narrowed down its understanding of Islamophobia to discrimination and violence against Muslims, which indicates conceptual negligence.

The fifth ground carries on the reluctance of the EU to show sufficient solidarity with Muslims and Islam. Although in recent years, the EU started to address the problems of Islamophobia in its policy framework, its support for Muslim communities is disproportionate to the increasing incidents of Islamophobia. The statistics proved that Muslims experience discrimination everywhere (Bayrakli & Hafez, 2019). As mentioned in the introductory chapter, far-right parties, which have gained great popularity in the EU Member States, (e.g. Front National in France, the Vlaams Belang in Belgium, the Party of Freedom in the Netherlands, Danish People's Party, the Sweden Democrats, True Finn Party, Alternative for Germany) are ganging up against European Muslims. Their request is: Assimilate or leave! Such antagonism reflects anti-Islam bigotry and even results in the killing of individuals. In response to this, not a single official statement at the EU institutional level is existent, which expresses solidarity with Muslims and Islam. In the political language of the EU, formulations such as Islam is part of Europe or Muslims are Europeans do not exist. The guidelines of the European Commission against racism and xenophobia indicated that the discourse of the EU policy frames Muslims and Islam as a problem in Europe, which has to be resolved in the best interests of European societies (European Commission, 2020). The combat against anti-Muslim hatred is motivated by the goal of the EU to uphold the standard of human rights protection and not by any deliberations to embrace Muslims and Islam. This and other factors mentioned above point out that the EU underestimates the problem and the complexity of Islamophobia, which eventually provides a ground for thinking of conceptual negligence.

The sixth factor also supports this point, that is, ambiguity over a working definition of Islamophobia. While scholars consider it of great significance to define and name Islamophobia

(Allen, 2017; Bleich, 2012; Sayyid, 2014), there is a lack of conviction that a working definition of Islamophobia is needed at the EU institutional level. As stated on the official page of the European Commission, in 2019, the Coordinator invited experts to ‘explore the need for and possibility to develop a working definition of anti-Muslim hatred/Islamophobia’ (European Commission, 2019). Such an approach towards a working definition hints at conceptual negligence. Thus, on the one hand, hostility against Muslims has been declared at the EU institutional level as a racial and discriminatory phenomenon. On the other hand, there is a lack of consideration that such a conceptualisation is problematic or misses significant points. Furthermore, the previously mentioned draft report of the seminar on a working definition of ‘anti-Muslim hatred/Islamophobia’ defined this phenomenon as racial discrimination (FRA, 2020). So, in the event of adopting a working definition, a change in the conceptual understanding should not be anticipated. Additionally, the formulation: ‘anti-Muslim hatred/Islamophobia’ points out that two terms with different conceptual meanings are treated as interchangeable. In this sense, conceptual negligence over Islamophobia at the EU institutional level becomes evident.

Last but not least, a range of aspects lead to the evaluation that the EU chose the politics of ‘doing nothing’ to cope with the challenge of Islamophobia (McConnell & Hart, 2014). Based on the previously discussed theory of public policy, as suggested by McConnell and Hart, inaction is also a policy response. In line with it, acts motivated by Islamophobia have become a daily practice for the last few decades, but the legal framework of the EU does not seek to acknowledge its presence. In 2008, for instance, the European Commission presented a proposal for a Council directive on implementing the principle of equal treatment outside the labour market irrespective of religious belief, which aimed at extending protections against discrimination and could become a source of protection for Muslims against discrimination in politics, healthcare or education (European Commission, 2008). However, the Council is yet to issue such a directive. Furthermore, a legislative train may be a complex matter at the EU institutional level, but neither non-binding policy documents such as the resolution of the European Parliament nor a Council Declaration addressed the topic of Islamophobia. These institutions showed great efforts to condemn challenging threats of anti-Semitism and homophobia and declare a climate emergency, but none of them has uttered a word against Islamophobia (Council of the European Union, 2020; European Parliament, 2006; 2019). This provides the seventh ground to think of conceptual negligence over Islamophobia as the EU chose to do nothing about it.

In sum, it is perceptible that the EU's approach towards the term and the phenomenon of Islamophobia, which has been expressed in insufficient policy measures and the narrow scope of conceptual understanding, is to be defined as conceptual negligence. If the EU does not establish the merit of Islamophobia, then it is unlike that the EU becomes an effective policymaker to cope with this challenge and embrace Muslims in the European multicultural societies. However, this dissertation does not curtail policy assessments with the conceptual vagueness over Islamophobia at the EU institutional level and with the absence of explicit EU policy measures to combat Islamophobia. It overlaps the study of those policy documents that address the topic of Muslim cultural integration. Recalling the nexus between Islamophobia and the cultural integration of European Muslims, the 'soft policy' measures of rising cultural awareness about Muslims, inclusive education, and the strategy of multicultural integration of Muslim immigrants or minorities can indirectly produce an effect on eliminating Islamophobia. Hence, these are the questions that have to be taken into consideration while addressing the EU's role in this respect.

6.2. EU's 'soft policy' framework regarding the cultural integration of European Muslims

The study of the EU's 'soft policy' framework regarding the cultural integration of European Muslims overlaps with the policy measures initiated by the EU institutions in the field of migration and integration (European Commission, 2021). The EU's participation in migrant integration began with the entry into force of the Treaty of Amsterdam (1999) and the decision of the special European Council in Tampere in 1999 (Commission of European Communities, 2003). The conclusions of the special European Council of Tampere identified the involvement of the EU in the areas of freedom, security, and justice as a top priority. With this, the EU started to set the policy priorities and common basic principles in the field of migration and integration (Commission of European Communities, 2002). Essentially, the guidelines have been adopted to address migration management, but successful integration of legally residing immigrants and their descendants in the EU became a critical aspect of managing migration. Member States faced the challenge to develop societies where newcomers feel welcome. Shortly after, following the signature of the Treaty of Lisbon in 2007, the EU gained the mandate to 'establish measures to provide incentives and support for the action of Member States with a view to promoting the integration of third-country nationals residing legally in their territories' (TFEU, Art. 79, Par. 4).

Currently, a large number of Muslim immigrants in Europe do not hold the citizenship of the EU, and so, they are affected by the EU's 'soft policy' towards the integration of third-country nationals. Such a policy includes actions aimed at increasing the participation of migrants in the host society. These include, for instance, support for language learning, introduction to the country's culture and history, access to employment, education, and vocational training. A key priority is to fight against discrimination and oppression of newcomers in the host society (European Commission, 2011, p.18). The backbone of the EU's migrant integration policy is the idea that if immigrants—despite their ethnic or religious belonging—are to be allowed to participate fully in the social life within the host society, they must have the rights to enjoy equal treatment and protection from discrimination. The grounds for protecting immigrants are the EU's law prohibiting discrimination in employment, education, social security, healthcare, access to goods and services, and housing (Council of the European Union, 2004, p.20). However, considering that immigrant integration is a domain which legally does not fall within the EU's main competencies, a set of political initiatives by the EU in the field offers a simple guide against which the Member States can judge and assess their own efforts (Wolleggem & Georges, 2019, p.8). Nevertheless, these common basic principles assist individual Member States to develop and implement a successful integration policy, which may otherwise become a failure and have an adverse effect on their stability or breed tensions within the society. After all, it is in the common interest of the Member States to pursue effective integration strategies to facilitate the social inclusion of third-country nationals in civil societies (Council of the European Union, 2004), p.15. Moreover, the EU considers its obligation to become more efficient in developing the common integration policy that ensures the possibilities of immigrants to become part of European societies. As stated by the Commission of the European Communities: '[...] creating a spirit of integration is a matter for EU society as a whole' (Commission of the European Communities, 2003, p. 24). However, till the present time, the EU used to approach the question of immigrant integration as a problem of newcomers to find their place in the host society, but now it has acknowledged that integration is a problem of those third-country nationals as well who hold the citizenship of the EU and have migration backgrounds. In this respect, the European Commission has placed emphasis on the following:

'The challenge of integration and inclusion is particularly relevant for migrants, not only newcomers but sometimes also for third-country nationals who might have naturalised and are EU citizens. This is why the scope of this action plan covers both migrants and EU citizens with a migrant background' (European Commission, 2020, p. 1).

Having said that, the analysis of the EU's action plans and integration strategy in terms of third-country nationals is relevant for European Muslims in general. These policy measures refer to educational initiatives and the need for intercultural dialogue, which plays a crucial role in understanding the EU's policy approach towards culturally different immigrant groups. A cornerstone of this study perspective is that the EU's policy of negotiating cultural differences applies to all, including those Muslims who represent second and even third-generation immigrants. Therefore, the EU's policy initiatives in the cultural domain, which aims to create a common general strategy of the cultural integration of immigrants, will have a broad impact on Muslim cultural identities. Furthermore, the analysis of these measures could reveal whether the EU's integration policy is oriented towards multiculturalism, hybridisation, or assimilation in terms of European Muslims. Yet, the final assessments depend on the relevant policy analysis.

Traditionally, in political studies, documents are considered the source of analysis, as they reveal the actions and interests of political actors (Karppinen & Moe, 2012, p.73). The EU's policy approach towards immigrants' cultural integration could be articulated through the text of the official documents of the EU. The research indicated that documents containing the policy formulation regarding the cultural integration of European Muslims are the Communications of the European Commission, which have been approved at the EU level. With this in mind, the study focused on the Communications of European Commission to the European Parliament, the Council, the European Economic and Social Committee, and the Committee of the Regions on the common agenda for an integration framework for the integration of third-country nationals in the European Union as well as the action plan on integration and inclusion. This is documentary evidence that is periodically issued by the European Commission to evaluate or initiate the integration policies and to identify problems in this area (Steiner & woods, 2009, p.305). In the period 2000–2020, the European Commission issued several Communications addressing the action plans for the integration of immigrants. The latent content of each official document has been studied by applying the method of content analysis. This technique initially revealed the EU's general vision of how to develop the sense of belonging of Muslim immigrants to the host community and the tools for facilitating it.

6.2.1. The EU's vision of the cultural integration of Muslim immigrants

A political vision of immigrant cultural integration in the host society implies policymakers' perceptions regarding the distribution of obligations and responsibilities between newcomers and the natives (Reitz, 2002, p. 1006). This defines whether the policy measures are designed to determine the opportunities for immigrants to participate in the host society as well as to guarantee the same rights and responsibilities that the natives enjoy (Givens, 2007, p.68). Following this, the cultural integration policy may contain initiatives and policy instruments favouring a certain integration approach. As Han Entzinger stated, the policy perspective in support of immigrants' cultural integration coincides with one of the following, discussed in previous chapters, models: multiculturalism, hybridisation, or assimilation. The policy shift, according to these models, depends on the policy terms. However, the policy terms follow the integration perspectives: It may oblige newcomers to adapt to their new social and cultural life, or the responsibilities could be shifted entirely to the host society to welcome the immigrants and grant them equal treatment. There is also a third way: to distribute the obligations linked to their new social modality between newcomers and the host society (Entzinger, 2000, pp. 97-98). In this sense, the EU's vision of Muslim immigrants' cultural integration could coincide with one of the integration perspectives and facilitate a certain model of integration.

Having said that, the research revealed that the EU had envisaged integration in its earliest stage of policy planning as a process in which both parties are equally responsible for developing the sense of immigrants belonging to the host society and the acceptance of immigrants by the host society. In the 2000 Communication issued by the European Commission, which was at that time referred to as the Commission of the European Communities, it has been stated: 'Integration is a two-way process involving adaptation on the part of both the immigrant and of the host society' (Commission of the European Community, 2000, p. 19). Two years later, this definition has been rephrased as follows:

'[...] integration should be understood as a two-way process based on mutual rights and corresponding obligations of legally resident third country nationals and the host society which provides for full participation of the immigrant' (Commission of the European Communities, 2003, p. 17).

In the amended definition of integration, the European Commission emphasised that immigrants and the members of the host society have certain rights, which cannot be ignored in democratic societies. This is a human rights-based definition of integration, which, in general terms, refers equally to the roles of both the parties: the immigrants and the host society.

However, certain peculiarities are connected to such a conceptualisation that has been indicated in the analysis process.

Initially, a problem is the dynamic character of policy formulation, in which the terming of 'integration' is not constant. A study of the documentary evidence revealed that the European Commission issued several Communications on the integration of immigrant groups in the EU and redefined the term 'integration' every time. This increases the possibility that the Commission may offer a different formulation of the concept in the next Communication and change the policy trajectory. However, such shifts in policy planning are normal when the integration dynamic is not a static phenomenon. Besides, the European Commission strives to achieve the conceptualisation of integration with a full response to the existing challenges. With this in mind, the research studies the actual EU policy vision and does not anticipate any future changes in the terming of integration. Also, it is crucial for the analysis that the main content remained unchangeable despite different formulations of integration as a concept in the Commission's Communications. The EU considers integration to be a dynamic and continuous process of mutual accommodation. It involves social and cultural adaptation by immigrants, who have rights and responsibilities in relation to their receiving community but also obliges the host society to create opportunities for the immigrants' full social, cultural, and political participation (Commission of the European Communities, 2005, p.3). In its latest Communication, referring to the action plan on integration and inclusion, the Commission stated:

'Integration and inclusion can and should be a win-win process, benefiting the entire society. But if integration and inclusion are to be successful, it must also be a two-way process whereby migrants and EU citizens with migrant background are offered help to integrate and they in turn make an active effort to become integrated' (European Commission, 2020, p. 2).

Having said that, the EU facilitates the third perspective of integration, which calls upon the immigrant groups as well as the host society to contribute to this process. At one point, such a statement may seem to be a clear message about the EU's multicultural strategy of managing cultural differences, but it is, in fact, a broad and vague approach towards it. The initial ambiguity refers to the term 'integration' defined by the Commission. The question is how mutual accommodation regarding the different cultures takes place between immigrants and the members of the host European society. Considering the Commission's emphasis in 2000 and 2005 Communications on the immigrants' responsibility to 'adapt', which has been removed

from the 2016 and 2020 Communications, its cultural dimension implies an anthropological term of acculturation (Sam & Berry, 2010). Then it is vague as to how and to what extent immigrants could preserve their cultural rights in the process of adaptation. As described in the previous chapters, acculturation is a ‘phenomenon of the value, attitudinal, and behavioral changes of individuals who come into continuous contact with another culture’ (Cheung-Blunden & Juana, 2008, p. 21). In broader terms, cultural adaptation or acculturation is a strong incentive towards assimilation and hybridisation (Lamphere, 2007, p. 1135). This happens when immigrants ‘fully’ change their values and living to become equal members of the host society. On the contrary, there are scholars who consider acculturation at some point as being a natural process, which does not fit within the particular model of cultural integration (Erten et al., 2018; Schwartz et al., 2010). The migration of people between different cultures has mostly been accompanied by a readiness to engage in intercultural exchange, which does not result in assimilation but rather leads to the evolution of multicultural societies (Erten et al., 2018, p.2). However, in the 2000 Communication, the Commission applied the term adaptation as an obligation of immigrants and as the responsibility of the host society (Commission of the European Communities, 2000, p.6). This indicated that there is also another multicultural understanding of adaptation, which does not refer to acculturation or the change of cultural behaviour of the immigrants, but implies the host society to adapt the new cultural group coexisting within the same social and political organisation (Hellyer, 2009). From this, it follows that the EU’s policy emphasising the cultural adaptation as a strategy of integration may refer to immigrants’ acculturation, which is a characteristic of assimilation and hybridisation, or may indicate the recognition of immigrant culture as grounds for living in a multicultural society. However, as a result of conceptual analysis of the EU’s reference to adaptation by both parties, it appears to contain rather the meaning of acculturation of immigrants, which assumes intercultural exchanges to result in value change of immigrants, and cannot become the ground for multiculturalism (Dietz, 2015). The incentive of such a finding is the EU’s emphasis on the role of the host society to help immigrants to integrate and transmit to them the values of the European societies (European Commission, 2020, p. 5). Furthermore, in its 2005 Communication, the European Commission made the following statement: ‘The practice of diverse cultures and religions is guaranteed under the Charter of Fundamental Rights and must be safeguarded unless practices conflict with other inviolable European rights or with national law’ (Commission of the European Communities, 2005, p. 9). This is an important note in the policy planning, which raises further questions, especially in terms of Muslim immigrants. Such a derogation reveals some inconsistencies with

egalitarianism in the integration process. Initially, it builds up the assumption on the role of the host society to transmit European values and national norms to the newcomers, so that the members of the host society do not adapt to all cultural differences of the immigrants but only those customs and traditions that comply with the norms of the European societies. For instance, Muslim immigrants may keep their religious identity because the freedom of religion is a key European value, but people in Europe will not put up with the Muslim tradition of praying in the street. At this point, the EU's strategy resembles the previously discussed spectrum of toleration theorised by Schiffauer, who argued that certain traditions of the immigrant groups lay beyond European toleration (Schiffauer, 2013).

Though in its 2005 Communication, the Commission explicitly stated that the EU's goal of 'strengthening the ability of the host society to adjust to diversity by targeting integration actions at the host population', this, in fact, does not imply the obligation of the host society to accept the conflicting cultural differences of immigrants (Commission of the European Communities, 2005, p. 5). It appears that the host society has an obligation to help the immigrants in learning the values of the host culture. A ground for such an interpretation becomes the reference of the Commission to the prevalence of European values and national norms (Commission of the European Communities, 2005, p.5). This aspect has been rephrased in the 2020 action plan on integration as follows:

'[...] gaining an understanding of the laws, culture and values of the receiving society as early as possible [...] is crucial for migrants to fully participate in the receiving society' (European Commission, 2020, p.9).

It is believed in socio-legal studies that the law is socially constructed. According to the legal and political scholar Mather, 'law is not autonomous, standing outside of the social world, but is deeply embedded within society' (Mather, 2011, p. 289). While interpreting this theory in terms of the European reality, it implies that the Member States' national laws were constructed to reflect the values of the European societies in the normative framework. Hence, the reference of the Commission to the values of the host society and the emphasis on the limit of the cultural or religious practices of immigrants when they come into conflict with the European or national laws underlines the prevalence of the cultural traditions of the host European societies. In terms of European Muslims, this means that with the help of the host society, they have to learn European culture and exchange their conflicting cultural differences with European and national values.

Therefore, on the one hand, the EU—according to the Communication of the European Commission—understands immigrant integration as a two-part process, in which it emphasises the acculturation of immigrants, so their values comply with the dominant cultural traditions and norms of the European societies. On the other hand, the sole role of the host society is to help immigrants undergo a certain change of values. Such an approach seems rather assimilative or oriented towards hybridisation. Nevertheless, understanding the particular model of cultural integration in which such a strategy may result in European Muslims brings up the question to what degree Muslims should acculturate so that they become acceptable to European societies.

6.2.2. Acculturation of European Muslims

Understanding the acculturation of European Muslims addressed by the EU in its 'soft policy' planning depends on the conceptualisation suggested by the EU as regards what European culture and European values are or how Muslim cultural behaviour may change. As discussed in the chapter of methodology, in classical anthropological studies, culture is considered a complex phenomenon. There are varieties of cultural elements one could discuss under this concept. It may describe all aspects of human behaviour, a symbolic organisation of a particular social group characterised by certain values, customs, beliefs, language, aesthetic tastes, and technical knowledge, but can also be limited to the arts (Burnett, 1920, p. 9). Likewise, the EU's applied definition of culture comprises an aesthetic and an anthropological approach. The anthropological definition of culture which the EU applied has been evolved by the academic Raymond Williams. The culture is 'which indicates a particular way of life, whether of a people, a period, a group, or humanity in general' (EU, 2017, p. 11). From this definition is derived the point that cultural adaptation referred to in the Communication text broadly means a change of lifestyle. This is a process when the system of values comprising customs, beliefs, and traditions may come under threat. In terms of acculturation of Muslim immigrants, it could be reinterpreted as a sacrifice of Muslim customs, beliefs, and traditions in order to acquire a place in European society. Such a conceptualisation indeed has a resemblance to the integration model of assimilation. However, the final assessment of whether the EU integration policy strategy aims at the assimilation of Muslim immigrants depends on the degree and the type of value change. Therefore, the research focuses on the EU's approach towards the value system.

The 2016 Communication of the European Commission explicitly referred to the immigrants' obligation to respect and understand the fundamental values the European Union is built on. This includes democracy, the rule of law, and respect for fundamental rights (European Commission, 2016, p.5). However, the indicated reference to the fundamental European values is something that every EU policy researcher could anticipate. The EU is a protagonist of the European value system and expects EU citizens or third-country nationals residing on EU territory to understand and respect the fundamental values. The promotion of the European value system is part of the migrant integration policy and is the backbone of European integration. In 2017, the EU celebrated the 60th anniversary of the Rome Treaties, wherein the EU leaders set out a joint vision to strengthen the European integration following the motto 'unity in diversity'(European Commission, 2017, p.2). This entailed a common identity building based on the common cultural heritage and fundamental European values. The decision has been made that whereas The challenge of populism tests European values and democracies, European leaders must respond by strengthening the European identity. As agreed in the Communication on strengthening European identity through education and culture, a roadmap for a more united, stronger, and more democratic union should follow the preservation of European cultural heritage, cultural diversity, and respect for the fundamental European values (European Commission, 2017). This argument facilitates the interpretation of cultural adaptation as a change in Muslim immigrants' cultural values to the extent that they acquire a European identity. However, it is not clear whether European identity construction amongst Muslim immigrants can truly be interpreted as an implication of their cultural assimilation.

In this respect, there are some emerging contradictions. Solely, the argument that the EU aims at promoting fundamental European values and the construction of common European identity on this basis is not sufficient to claim that the EU's integration strategy follows the plan of the assimilation of immigrants. This aspect is also contested in the academic discourse, as some authors defined integration to refer to the 'inclusion [of immigrants] in already existing social systems' (Esser, 2004, p. 46). Since social inclusion does not exist apart from the cultural aspects, immigrants should also undergo a cultural change to become accepted in the 'core institutions, relations and statuses of the receiving society' (Heckmann, 2006, p. 18). From this point of view, the EU's political goal of the cultural adaptation of immigrants does not go any further than complying with the general principles of democratic societies. Considering that immigrants' inclusion should take place in an egalitarian social atmosphere, respect for fundamental human rights and freedoms is the backbone of egalitarianism, which facilitates peaceful living together in a culturally diverse society. All scholars may agree that the EU is

faced with the phenomenon of increasing cultural and religious diversity as a result of immigration. It is difficult to manage intercultural challenges, whereas immigrants bring with them distinct cultural traditions that are not the characteristic of the European one. The way to maintain stability is a policy strategy that follows the management of intercultural challenges corresponding to the basic human rights requirements. This is why the immigrants and the host society have to agree on respect for the fundamental values of the community they live in. According to Firth, in any form of social organisation, there are general principles and laws that all members agree on. It ensures that the social organisation functions as a coherent system (Firth, 1955). Hence, in the 2005 Communication of the European Commission, there was an emphasis made on the arrangements to solve the cultural or religious conflict in a way that reflects respect for the EU's fundamental values (European Commission, 2005). One should remember that the EU's fundamental values are nothing else apart from universal human rights and freedoms. This statement is proven by the provision in the Treaty of Lisbon, which listed clearly what the European values imply:

‘The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail’ (Art. 1a).

Therefore, if, according to the EU integration strategy, the Muslim immigrants have been aligned with obligations and responsibilities towards the host European societies to adapt to that extent that they gain an understanding of the fundamental European values, this means respect for those general principles which at the same time guarantee their cultural and religious freedom. To put it simply, one adapts to and obeys the same laws of organisational society, which guarantees one's protection within this organisation. Cultural diversity is a fact in the EU that the community respects, but there are fundamental principles and values linked with life under such a social and cultural establishment that everyone—the newcomer and the native—must obey. Following this, if the EU's reference to the immigrant cultural adaptation implies the degree of acculturation that does not exceed the general respect for fundamental EU values, this policy aspect cannot count as an incentive of assimilation.

Respect for European values, in fact, becomes the basis of equal citizenship and is a cornerstone of multiculturalism. This question was addressed during the Tampere European Council held in 1999, which explicitly requested that EU had to launch ‘a more vigorous

integration policy' that 'should aim at granting legally resident third country nationals rights and obligations comparable to those of EU citizens' (Tampere European Council, 1999, par. 3). On this ground, the European Commission drafted a policy framework fostering the integration of immigrants in the EU and, at the same time, put forward the initiative for a legal framework on the status of third-country nationals, which grants equal treatment and rights to the immigrants residing legally on the territory of the EU. In the 2000 Communication, the Commission made a reference to the Charter of Fundamental Rights and introduced a concept of 'civic citizenship', which means guaranteeing certain core rights and freedoms to immigrants so that they gradually acquire the treatment in the same way as nationals of their host state (Commission of the European Communities, 2000, p. 19). In addition, in the 2003 Communication, the Commission emphasised that immigrants' formal rights and freedoms are to be protected, and they should possess the possibility to participate in the economic, social, cultural and civil life, 'without having to relinquish their own identity' (Commission of the European Communities, 2003, p. 18). An emphasis on preserving the identity which the immigrant carries while immigrating to the EU could be extended to its cultural dimension. Though this could become the subject of various interpretations, one way of understanding such wording is that the European Commission explicitly referred to a holistic approach in the European integration policy to guarantee the protection of fundamental rights of third-country nationals, which enables them to maintain their different cultural identities. Furthermore, in its 2016 Communication, the Commission referred to the effectiveness of integration, which enables all—the immigrants and the host community—to live in diverse European societies. Emphasis has been placed on the EU's fundamental values, including democracy, the rule of law, and respect for human rights and fundamental freedoms. These are all enshrined in the Charter of Fundamental Rights of the European Union and have crucial importance for the integration process, as they guarantee the freedom of religion and the rights to equality and non-discrimination. The Commission emphasised how important it is for migrants to understand and subscribe to these fundamental values of the EU as this is a way to protect their own rights and foster their inclusion in the host society (European Commission, 2016, p.2). Hence, acculturation of Muslims with the meaning of sharing European values, which first of all guarantees the protection of their cultural and religious identity, cannot be understood as cultural assimilation. However, such a discussion is not exhaustive; there is space for deeper analysis.

An argument for the assumption that Muslim acculturation takes on a different scale than simply respecting European values is based on an emphasis by the European Commission on conflicting cultural traditions. It stated:

‘[...] difficulties can arise where religious or cultural beliefs or practices conflict with European fundamental values or with national law. In such cases each Member State must look for solutions which will necessarily reflect the national situation and the need to respect European fundamental values and national laws’ (European Commission, 2005, p. 19).

The introduction of the principle that amongst European values, the national norms also define when and to what extent immigrants can enjoy their cultural freedom changes the discourse of the discussion. If a precondition of immigrant acceptance was respect for European values, which are—as Max Haller subjectively stated—irreversible axiological values, accepted by any enlightened person throughout the world (Haller, 2003, p. 227), then it would exclude the possibility that integration of Muslims into the European societies may come down to cultural antagonism. In fact, there are two possible scenarios in which a cultural antagonism may happen between Muslim immigrants and the host European societies. First, if the behaviour of the immigrant indeed undermines fundamental human rights, and second, if the host society perceives that certain cultural traditions of immigrants are threatening fundamental human rights. However, there is a great deal of interpretation in understanding what is against human rights in the Muslim cultural traditions or behaviour. In this respect, one could think of some examples that have triggered public discussions in some European countries, such as animal slaughter, circumcision, or even traditional religious closing. It is debatable whether these traditions clash with fundamental European values, but some of them conflict with national laws, such as the French law on religious neutrality. In such cases, the reference of the European Commission that amongst European values, the national laws of the Member State prevail, raises the possibility of cultural antagonism. Furthermore, in 2020 Commission stated that immigrants should learn and respect the laws and values of the host European societies, which implies universal European values and the traditional norms of the Member States (European Commission, 2020, p. 9). Such an emphasis on the laws and values of the host European societies, which contains a reference to limiting religious freedom when it conflicts with the national law, does lead to certain sacrifices from the side of Muslim immigrants, which requests a greater degree of acculturation than to comply with the fundamental European values.

In the end, this becomes not antagonism between European and Muslim values, but rather the clash of European state secularism with Muslim religious practices.

Another argument supporting the framing of the EU cultural integration policy as oriented at a non-multicultural model is the emphasis on the significance of European identity, European culture and the European cultural heritage in the 2020 action plan for integration (European Commission, 2020, p.1). As defined by the EU, 'Europe's cultural heritage constitutes a shared source of remembrance, understanding, identity, dialogue, cohesion and creativity for Europe' (Decision (EU) 2017/864, par. 1). European Commission denoted in the report and the Communication about a new European agenda for the culture that cultural heritage makes a significant contribution to defining the identity of European citizens (European Commission, 2014, p. 1; 2018, p. 19). From this follows, European citizenship of Muslim immigrants and their belonging to the host society rest upon the respect and knowledge of tangible and intangible cultural goods common for European societies. This includes Christian traditions and western secularism, but not Islam or Muslim traditions. Hence, the EU favours the idea of 'melting pot', where equal opportunities to Muslims are granted in the condition if they share the European culture.

To sum up, the analysis of the EU's reference to the cultural integration, the role of the host society and adaptation of immigrants to the European values and national norms lead to the contested findings. On the one hand, it appears that the EU understands cultural integration as a two-part process, which involves the immigrant and the host society, and in which both parties have rights and responsibilities in the integration process. To make the integration functional, the EU expects the immigrant as well as the host society to adjust to the new cultural reality. This means that the immigrant learns and respects the EU's fundamental values and national law. On the other hand, the host society respects the right of the immigrant to enjoy cultural and religious freedom. Nevertheless, the host society does not have to put up with the conflicting cultural differences of the immigrants. It has a single function to teach its historical values to the newcomers, share the European cultural heritage with immigrants and help them to comply with the new value system. Eventually, it remains the immigrants' key responsibility to fit in the host society. If fitting in or gaining acceptance into European societies would have a precondition of compliance with the European values of universal human rights and freedoms, this type of adaptation could not relate to the acculturation as an incentive of assimilation because the same fundamental human rights guarantee the protection of one's cultural and religious freedom. However, with reference to the national laws and European cultural heritage,

the discussion came down to the shared knowledge of European Christian traditions and the principle of secularism, which does oppose Muslim religiosity, at least certain aspects of its public manifestations. As discussed in the chapter of integration theories, if Muslims by law and by the reference of the EU have to comply their religiosity with the norm of secularism and to share the European cultural heritage, then the European Muslim becomes a hybrid identity, which unifies the religion of Islam concerning the western European secular way of life and the heritage of Christian culture. Such an assessment of the EU's cultural integration strategy could be further validated through the analysis of the EU's 'soft policy' instruments of education and cultural dialogue.

6.3. The EU's 'soft policy' instruments of supporting Muslim cultural integration

The facilitation of cultural integration in culturally diverse societies follows the way of developing the cultural awareness of the people about the 'self' and the 'other'. This always becomes a central issue in the interaction with immigrants from other cultures. People with different cultural backgrounds see and evaluate the cultural behaviour of the self and the other in different ways. What is considered to be appropriate behaviour in one culture is frequently inappropriate in another one. In order to avoid stereotypes and misapprehensions about different cultural values—which often leads to racism and xenophobia—members of multicultural societies should become aware of those cultural differences and learn to respect them (Cardona et al., 2015, p. 1360). Hence, integration policies aimed at facilitating immigrants' cultural integration should direct their policy instruments to develop cultural awareness of the immigrants and the members of the host society as well. In terms of Muslim immigrants, this means that they understand and respect European values, but, at the same time, the host European societies become aware of Muslim culture and traditions. It is significant that developing cultural awareness is natural in the process of interaction between immigrants and host societies. Over time, different cultural groups living in the same social environment acquire knowledge of each other's cultural values (Erten et al., 2018, p.2). However, the integration policy may hasten this process and ensure the development of positive cultural awareness about different cultural groups. Broadly, there are two methods of relevant policy intervention: First, introducing educational programmes so that immigrants and the host society develop cultural

awareness by learning; and second, facilitating frequent interactions by arranging intercultural dialogue platforms (Banks, 2001; Shorten, 2010; Skrefsrude, 2016).

Having that said, the EU's strategy on immigrants' cultural integration could have been built up by those policy instruments, which have the goal of developing cultural awareness through educational programmes and activities of intercultural dialogue. Following this, the next step in the study of the European Commission's Communications on this topic is to focus on the initiatives related to educational programmes to raise immigrants' cultural awareness, as well as facilitating intercultural dialogue between Muslim immigrants and the members of the host European societies through different interactionist platforms. The articulation of each policy instrument and the perspective they take may become the incentive of a certain integration model. However, there are some peculiarities in understanding the EU's initiatives about educational programmes or intercultural dialogue. Initially, such policy instruments of the EU contain general recommendatory references to the obligation of the Member States to use education and intercultural dialogues for raising the cultural awareness of immigrants and the host society about cultural differences. The European Commission explained:

‘While national governments are primarily responsible for the overall design of integration and social policies such as education, employment, housing and healthcare, the EU plays a key role in supporting them and all other integration actors through funding, developing practical tools, coordinating actions and establishing relevant partnerships’ (European Commission, 2020, p. 7).

Following this, the qualitative data of the respective EU ‘soft policy’ initiatives lack elucidation and become the subject of interpretation. Furthermore, the policy instrument and its effective implementation have a substantial impact on the policy output: no policy can be successful unless there is a parity between the policy goals and their implementation (Peters, 2005, p.19). In this respect, the EU, too, is missing the leverage of fulfilling those initiatives. Nevertheless, its recommendations on the role of educational programmes in raising cultural awareness in culturally diverse societies and regarding the need for intercultural dialogue between immigrants and the members of the host society represent sufficient basis for the anthropological analysis in terms of the cultural integration of European Muslims.

6.3.1. The role of education in raising cultural awareness

Developing the cultural awareness of immigrants and the host society implies understanding of and respect for their cultural differences—especially differences in their attitudes and values (Cardona et al., 2015, p. 1360). A policy instrument of raising cultural awareness refers to a particular form of education. In the scholarly assumptions, education-oriented at raising cultural awareness in the multicultural society—in its broadest definition—refers to transmitting those values and norms which affect peoples’ commitments, beliefs and actions to live in peace despite cultural differences (Crittenden & Levine, 2018). The goal of education defines its forms, but which educational model is the most desirable becomes a matter of discussion. Contemporary debates are about multicultural and intercultural models of education. It takes a form of multicultural education, a method of teaching about good citizenship, based on respect for cultural differences, tolerance, human rights and freedoms. It has the particular aim in a multicultural society to facilitate the recognition of minority cultures and the understanding of how multiculturalism is constructed (Shorten, 2010, p.58). In addition, multicultural education is an instrument of public policy, which aims at providing opportunities for minority cultural groups to maintain their customs and traditions, while at the same time facilitating the construction of a civic society in which diverse cultural groups are included and to which they feel allegiance (Banks, 2001, p.6). A slightly different type of civic education implies intercultural education. Though there are some scholars who use multicultural and intercultural education interchangeably, the difference is in the goal of such education (Nieto, 2006; Hill, 2007). Explained by UNESCO:

‘Multicultural education uses learning about other cultures in order to produce acceptance, or at least tolerance, of these cultures. Intercultural education aims to go beyond passive coexistence, to achieve a developing and sustainable way of living together in multicultural societies through the creation of understanding of, respect for and dialogue between the different cultural groups’ (UNESCO, 2006, 18).

However, debates about multicultural and intercultural education resemble the previous discussion about the cultural integration models of multiculturalism and interculturalism.¹⁴ Intercultural education is an instrument of interculturalism, which takes the direction of negotiating the cultural differences, and goes beyond passive coexistence and seeks to establish the link between different cultural groups so that they find a way of living together in a

¹⁴ See Chapter 3

culturally diverse society (Holm & Zilliacus, 2009, pp.11-12). However, there are general characteristics similar to both models of education. Initially, it refers to promoting equality and teaching how to function as socially active individuals despite different cultural identity (Sciame-Giesecke et al., 2009, p. 156).

This dissertation addresses the question from the perspective of what becomes a common link or a fundament of living together between the members of host European societies and Muslim immigrants from the intercultural perspective. A significant aspect of understanding the concept of intercultural education is that it teaches representatives of minority cultures how to function in the majority culture (Sani, 2015, p. 1149). Though this is considered as an advantage of intercultural education, in the dichotomy of immigrants and the host society, it implies the immigrants' need to commit to the values and norms of the host society. Otherwise, they cannot acquire their role in society. So, while multicultural education emphasises teaching about cultural differences, equality and good citizenship, intercultural education goes beyond it and implies a transmission of the values of the host society to the immigrants. Therefore, in order to understand the type of cultural integration that the EU's educational initiatives eventually intend to facilitate, the research focuses on what the EU's reference to education means in terms of raising immigrants' cultural awareness, the perspective which it takes, and the extent to which it implicates the host society.

The research identified that in the early stage of drafting the integration programme of third-country nationals, the EU's main focus has remained on the forms of education and training that increase immigrants' employment possibilities. The European Commission gave little consideration to raising the cultural awareness of immigrants and the host society. However, it did not take long for the EU to understand that it is not only the language skills and professional knowledge that educational programmes may offer to immigrants to facilitate their integration in the labour market and foster broader social cohesion. The cultural integration of immigrants is also crucial; the educational programmes oriented at raising their cultural awareness may play a significant role.

‘[...] education contributes [...] to learning essential social and civic values such as citizenship, equality, tolerance and respect, and is particularly important at a time when all Member States are challenged by the question of how to deal with increasing social and cultural diversity’ (European Parliament and the Council, 2006, p. 10).

Having said that, the EU's reference to civic education considers promoting the idea of equal citizenship or good citizenship, through which immigrants may develop their belonging to the

host society, and the community embraces them. This means that both parties have to learn and respect fundamental human rights, norms, and values of equality and tolerance. In its 2003 communication, the Commission placed a general emphasis on the importance of education and addressed the issues related to encouraging pluralism and diversity at school and the significance of close cooperation between the school and immigrant communities (Commission of the European Communities, 2003, p.33). Later, in the 2005 Communication, the Commission offered some educational measures all Member States may follow to facilitate the cultural integration of immigrants. On the one hand, reference has been made to introduce programmes for newcomers, in which immigrants learn about the language, history, institutions, norms, and cultural life of the host society and fundamental European values. Such introduction programmes may take the form of part-time or evening courses, fast-track modules, and even distance learning, but it is essential that every immigrant should have access to these introductory educational programs. On the other hand, the Commission emphasised the urgency of reflecting cultural diversity in the school curriculum so that representatives of diverse cultural groups learn and understand the cultural differences between each other (Commission of the European Communities, 2005). It stated: '[...] education about immigrants and immigrant cultures [...] enhance the interactions between immigrants and Member State citizens' (Commission of the European Community, 2005, p. 9). After two years, the Commission emphasised that raising awareness about immigrants' culture should not weaken knowledge about the culture of the host society.

'Deepening knowledge about one's own culture and about the cultures of others may support migrant pupils' self-confidence while providing value for all pupils. Such intercultural education in no way needs to weaken the primary focus on the identity, values and symbols of the host country. It involves above all building mutual respect, developing an understanding of the negative effects of prejudices and stereotypes and cultivating the ability to take different viewpoints while increasing knowledge of and seeking respect for the core values and fundamental rights of the host society' (Commission of the European Communities, 2008, p. 11).

Such a reference of the European Commission to intercultural education may become the subject of confusion. This could mean that the EU favours intercultural education, or it addresses interculturalism and multiculturalism interchangeably as a matter of conceptual confusion. Such an assumption rests upon the fact that the definition of multiculturalism suggested by the EU has a resemblance with the concept of interculturalism. It stated:

‘[Multiculturalism is] a policy that endorses the principle of cultural diversity and supports the right of different cultural and ethnic groups to retain distinctive cultural identities ensuring their equitable access to society, encompassing constitutional principles and commonly shared values prevailing in the society’ (European Commission, 2021).

Besides, the EU took a very general but multicultural stand to address the role of education in the process of cultural integration. European Commission initiated that immigrants and the representatives of the host society should both learn about their own cultures and also understand and respect the cultural traditions of each other. This position has been maintained in its 2020 action plan of integration, where the main focus has been maintained on schools, which are places where the actual process of integration occurs. The Commission emphasised that school programmes should be designed so that they serve the inclusiveness of culturally and linguistically diverse children (European Commission, 2020, p. 8).

Furthermore, to achieve this, the Commission referred to the necessary skills and resources of teachers to teach in multicultural classrooms and fight segregation (European Commission, 2020, p.8). In addition, 2020 EU action plan against racism defined the role of education in tackling stereotypes and prejudices against minority cultures (European Commission, 2020, p.11). From this perspective, the EU’s initiative fits the multicultural model of integration. However, this is a superficial assessment of the EU’s educational policy approach. A cornerstone of intercultural education is that it shares all aspects of multiculturalism but goes beyond it by aiming at the formation of a common link, shared value system between culturally diverse groups, which in practical terms implies the transmission of certain elements from majority culture to the minority culture. In response to it, in the action plan suggested by the European Commission on immigrant integration, it was stated:

‘Gaining an understanding of the laws, culture and values of the receiving society is crucial for third-country nationals to understand the responsibilities linked with their new life in the receiving society and actively participate in it’ (European Commission, 2016, p. 8).

A similar emphasis has been placed in the 2020 action plan within the Communication of the European Commission, which stated that for full participation in the receiving society, the immigrants should learn its laws, cultures, and values (European Commission, 2020, p.9). Though the European Commission is very careful in its formulations, such a reference does not mean that immigrants should only gain the knowledge of the host culture but identifies that they

should also bring their cultural traditions in compliance with it so that cultural differences do not prevent them from taking an active part in the social and cultural life of the host society.

Overall, the representatives of the host society learn about immigrant cultures to avoid racial attitudes towards immigrants, but they do not instil these traditions in their practice. On the contrary: the immigrants learn the host culture to adopt certain values that help them gain the feeling of belonging to the host society (European Commission, 2020). In this context, it is more elucidative to bring in the example of Muslim pupils. According to the EU's policy plans regarding education, the representatives of host European societies may learn about Islam and Muslim traditions, which will help them acknowledge that there are culturally and religiously different groups living amongst them. However, Muslims learn about the European way of life and the principle of secularism; they learn it to instil it in their ordinary life. Eventually, such a form of education is rather oriented towards their hybridisation.

To sum up, education is dealt in the EU in accordance with the principle of subsidiarity, which means that the competencies for education are recognised to lie with the Member States, and the EU can recommend a way of policy improvements, but even in such a conditional situation, the EU did not come to the strategic planning to reach the national, regional, or local level for its multicultural educational initiatives, which could significantly facilitate the cultural inclusion of Muslim immigrants. Hence, the analysis of the EU's educational initiatives in terms of immigrants' cultural integration and drawing parallels with Muslim immigrants lead to the following postulates: First, developing cultural awareness in the culturally diverse society through educational programmes is not an effectively planned 'soft policy' instrument of the EU, but the references made on this topic could facilitate analysis in favour of certain directions in developing cultural awareness. Second, the EU referred to the acquisition of knowledge about the host societies' values as well as the immigrants' culture, which is a shared aspect for both multi- and intercultural education. A decisive factor became the intention of the education to link immigrants with the host society through core European and national values, which creates the incentive of intercultural education primarily. Hence, for Muslim immigrants, such a model of education eventually means their cultural hybridisation, as they are educated about the cultural differences in general and learn to negotiate these differences with the host European societies in favour of European and national values.

Likewise, this aspect becomes a decisive factor in assessing the EU's 'soft policy' perspective of intercultural dialogue between immigrants and the host society.

6.3.2. Facilitating intercultural dialogue between Muslim immigrants and the host society

Intercultural dialogue is a powerful instrument to raise cultural awareness and facilitate the inclusion of immigrants in host societies. Traditionally, it implies ‘a constructive and positive interaction between persons or groups which are culturally different from each other’ (Skrefsrude, 2016, p. 12). Such an interaction consists of an exchange of ideas, knowledge, cultural views, and experiences between immigrants and the representatives of the host society. The value of intercultural dialogues is the aim to develop a deeper understanding of diverse cultural groups and their customs and traditions. This is a platform wherein people with different cultural values have the possibility to negotiate those cultural differences and find a way of developing an inclusive society. The intercultural dialogue between the immigrants and the members of the host society fosters tolerance, non-discrimination, and equality in a multicultural society (Skrefsrude, 2016, p.5).

However, intercultural dialogue may not always serve the purpose of multiculturalism. John Igbino calls it the intercultural dialogue between equals when different but equally recognised cultural groups are involved in the dialogue and share cultural characteristics. The aim is to emphasise the value of multiculturalism (Igbino, 2011). This may happen between the representatives of European national cultures which do not come into conflict with each other and stand on an equal footing, e.g. intercultural dialogue between the Germans and the Belgians or the French. The intercultural dialogue between ‘unequals’, or—as Igbino describes it—a colonial dialogue, takes place between Europeans and the people of former colonies, in which representatives of the dominant European cultural group dismiss the viewpoints of other cultural groups and underline the values of the European one. This type of cultural dialogue always has assimilative characteristics unless it equally emphasises the significance of the cultural values of the other party (Igbino, 2011, p.58).

Fitting Muslim immigrants in the above discussion resembles an intercultural dialogue between ‘unequals’. Such an assessment rests upon the European self-image of cultural supremacy and western postcolonial attitudes towards the ‘Orient’. Considering the identity theories discussed in the previous chapter about ‘selfing’ and ‘othering’, in which Muslims are stereotyped as the cultural ‘other’, being inferior with their cultural traditions to the European cultural values, this puts Muslim immigrants on an unequal footing with representatives of the host European societies. Furthermore, the cultural dialogue between Muslim immigrants and the members of the host European societies takes place on European grounds, so that European cultural groups are in domination. Apart from the problem of inequality, a significant factor

that may hamper the intercultural dialogue refers to cultural conservatism. This concept merits the tendency of maintaining the immigrant's cultural identity by denying them entry into the cultural dialogue with the host society.

On the contrary, the host society may aspire to preserve cultural homogeneity by closing up against the newcomer (Erten et al., 2018, p.3). This becomes a ground for segregation and exclusion. However, scholarly and political views in this respect are divided in the case of Muslim immigrants residing in Europe. Populist politicians insist that Muslims do not enter into intercultural dialogue in Europe and close up against European societies (Schmuck, et al., 2017). Nevertheless, a group of scholars does not describe Muslims as tending to cultural conservatism. In this context, references have been made to European Muslims, who respect and are loyal to the principles of democracy. Furthermore, they assume that a problem lies with the host society. European stereotypes and misperceptions about Muslims become obstacles to intercultural dialogue, and European societies tended to close up against Muslims based on their cultural differences (Meer, 2008; Karic, 2015; Hashas, 2019).

With this in mind, a general reference to facilitate the integration of immigrants into the host European societies through intercultural dialogue does not itself represent the strong incentive of inclusion. A 'soft policy' instrument of intercultural dialogue requires effective planning to reach the national and local levels and arrange the platform where Muslim immigrants and the representatives of the host society will meet and exchange knowledge of their cultures on an equal footing. Therefore, the research focuses on the policy planning of the EU and also how such a policy of intercultural dialogue affects the integration of European Muslims.

Having said that, the research selected the documents of the EU related to the topic of intercultural dialogue published in the EUR-Lex database—the official database of all its legal texts, as well as the relevant information published on the official page of the EU and the official page of the European Commission. It mainly contained the reports and communications of the European Commission in the field of immigrant integration, culture, and education.

The analysis revealed that the EU had incorporated intercultural dialogue into its diverse policy areas, including immigrant integration, with the purpose of developing intercultural skills, mutual respect, and recognition between culturally different people in the multicultural environment. The EU first advanced this topic in terms of third-country nationals in the 2005 Communication of the European Commission, where the reference was made to the need for intercultural dialogues to facilitate frequent interactions between immigrants and the representatives of the host society as a means of fostering integration. It had a form of overall

recommendation towards the Member States in the context of avoiding the radicalisation of young immigrants while developing ‘a new sense of identity’ (Commission of the European Communities, 2005, p. 9). In this sense, the Commission assumed that new identity construction amongst young Muslims residing in Europe is irreversible, and to eliminate the possibility that strong religious beliefs could foster radicalisation in this process, it is significant that they enter into the intercultural dialogue with the members of the host European societies. It later became clear that intercultural dialogue is not only necessary to prevent the radicalisation of young immigrants but preclude xenophobic attitudes against immigrants and teach newcomers about European values.

In 2016, the European Commission initiated an intercultural dialogue where, among immigrants, the church and different faith communities would participate and negotiate clashing cultural or religious traditions in alliance with the European values. The Commission emphasised that ‘the promotion of intercultural dialogue, including interreligious dialogue between faith communities, of respect for human rights, and of European values is essential’ (European Commission, 2016, p. 5). A similar emphasis has been placed on the importance of intercultural dialogue again in the 2020 EU action plan of immigrant integration (European Commission, 2020 p.2). This indicates that intercultural dialogue has been a priority of the EU, but a reference made in a generic manner cannot count as a policy measure. With this in mind, the research shifted the focus to the actual policy of the EU to bring culturally different groups into the dialogue. This indicated that in 2007–2013, the EU launched numerous cultural programmes to promote European cultural heritage and European cultural diversity (European Commission, 2007). 2008 was the European year of intercultural dialogue, which predominantly served to strengthen the cultural bond between the people of Europe, but also between the members of the host society and non-European immigrant groups. It implemented a variety of projects related to sport and cultural events to bring immigrants and the representatives of the host society together (European Commission, 2010). It was followed by Creative Europe 2014–2020, which embodied intercultural dialogue through culture and art amongst people of Europe and brought people outside Europe close to the European creative sector (European Parliament and the Council, 2013). The fundamental goal of carrying out such cultural activities was averted in 2006 by the decision of the EU with reference to deal with the diversity of the European cultures by means of facilitating intercultural dialogue.

‘At the heart of the European project, it is important to provide the means for intercultural dialogue and dialogue between citizens to strengthen respect for cultural

diversity and deal with the complex reality in our societies and the coexistence of different cultural identities and beliefs. Furthermore, it is important to highlight the contribution of different cultures to the Member States' heritage and way of life and to recognise that culture and intercultural dialogue are essential for learning to live together in harmony' (European Commission, 2006, p. 44).

In fact, those programmes had a specific goal to circulate cultural and creative works through transnational mobility within and beyond the EU. Facilitating intercultural dialogue was only an added value. It is significant that such cultural activities contained a vision of intercultural dialogues more as an aesthetic thing; in terms of immigrant groups, it served the sole purpose that they gain the knowledge of European art and cultural heritage. However, neither the European year of intercultural dialogue nor Creative Europe embodied the idea of intercultural dialogue between immigrants and the representatives of the host European societies with the aim to raise cultural awareness about their different values, traditions, and customs. In line with this, the evaluation report of the European Commission emphasised that those cultural programmes lacked relevance to the immigrants and refugees and their problem of cultural inclusion (European Commission, 2018, p.5).

The European Union took an interest in connecting cultural policies and diversity policies in respect of the immigrants and refugees with the purpose of intercultural dialogue in response to the 'refugee crisis' in 2015. In this sense, the EU invited experts and stakeholders from the culture sector to plan cultural programmes and activities that would promote intercultural dialogue between different cultural groups by means of culture and art (EU, 2017). However, the planning of cultural programmes, which could facilitate intercultural dialogue, undermined its understanding as the core concept used to deal with differences in beliefs, values, and traditions between immigrants and the representatives of the host society. Gaining knowledge of the aesthetic aspects of European culture is an important dimension of immigrant inclusion, but it does not represent a direct response to the cultural integration problem of newcomers or third-country nationals with migration backgrounds. This indicated that the EU acknowledges the significance of intercultural dialogue for immigrants to be included in the host European societies but leaves the responsibility of actual policy planning to the Member States. It is understandable that the subsidiary character of the EU's competence in this respect does not support its involvement in policymaking at the national or local levels, but that the EU also failed to provide a set of guidelines or recommendations against which the Member States could judge and evolve their national action plans on intercultural dialogue. Furthermore, the EU

spent its funding and efforts to popularise the European cultural and artistic sector amongst immigrants, which not only undermined the understanding of intercultural dialogue as the exchange of opinions about values, traditions, and customs but also curtailed the possibility of immigrant groups to popularise the aesthetic side of their traditional cultures. Such peculiarities raised the question as to what the conceptual vision of the EU is towards intercultural dialogue.

6.3.2.1. The EU's vision of intercultural dialogue

A scholarly definition of intercultural dialogue emphasised that it should take place in an equal atmosphere, where immigrant groups gain knowledge about the cultural values of the host society, but can also raise awareness of the representatives of the host society about their beliefs, traditions, and customs. This is a significant aspect that policy actors should envisage in their policy agendas. In line with this, it appears that the EU does not define intercultural dialogue to be much different than suggested by the scholars. In cooperation with the Council of Europe, the EU came to the conceptual understanding of it as ‘an open and respectful exchange of views between individuals, groups with different ethnic, cultural, religious and linguistic backgrounds and heritage on the basis of mutual understanding and respect. It operates at all levels—within societies, between the societies of Europe and between Europe and the wider world’ (Council of Europe, 2008, p.10). This definition has been fully shared by the EU, but it placed further emphasis on building the value system through which the immigrant feels belonging to the host society. It stated: ‘Projects and practices inspired by intercultural dialogue have the potential to produce new and inclusive values’ (EU, 2017, p. 18). Furthermore, the European Commission stated a definition of intercultural dialogue on its official page, wherein the goal of the interaction is not only to understand the cultural differences of each other but to find a link between immigrants and the representatives of the host society, which facilitates a formation of a unified inclusive society. The European Commission formulated it as follows:

‘Intercultural dialogue is, essentially, the exchange of views and opinions between different cultures. Unlike multiculturalism, where the focus is on the preservation of separate cultures, intercultural dialogue seeks to establish linkages and common ground between different cultures, communities, and people, promoting understanding and interaction’ (European Commission, 2019).

Such a definition of intercultural dialogue predominantly serves for the purpose of multicultural integration, which does not only popularise the majority culture but also raises the cultural awareness about the members of the host society about immigrant culture. However, what brings a sense of inequality in the intercultural dialogue is the EU's aspiration to reconcile cultural differences by establishing the linkages between two cultures, which is a decisive factor in the analysis. Drawing parallels with Muslim immigrants, it leads to the following scenario: The group of Muslims, believed to be representatives of a culture fundamentally different from the European one, interacts with the members of the host European society through the platform of intercultural dialogue. They have to search for common grounds for establishing a link between different cultures. Considering that Oriental culture and European culture do not have common cultural heritage or family resemblance, only through common linkages these cultural groups may find that it is all about sharing European values and national norms.

In this sense, the conceptual analysis of intercultural dialogue versioned by the EU indicates the same formula of transmitting European values in terms of intercultural education. Hence, the members of European society acquire knowledge of immigrant cultures to eliminate the possibility of emerging racial and xenophobic attitudes but do not find the use of this knowledge for the purpose of sharing certain Muslim values to establish the cultural link with them. On the contrary—they teach Muslim immigrants the values of the majority culture, the European values, and the national norms—which ensures that a cultural bond is established between them. In practical terms, such an intercultural dialogue results in something else but not in the multicultural policy perspective of living together. This is why some scholars prefer to rename intercultural dialogue as trans-cultural dialogue, referring to cultural reconciliation by establishing a common cultural link between the immigrants and the representatives of the host society, which should rest upon the shared common values of majority culture (Dietz, 2015, p.1). Such trans-culturalism is predominantly aimed at the cultural hybridisation of immigrants and develops a new sense of identity among them.

In sum, the EU refers to the intercultural dialogue in a generic manner; it lacks actual policy recommendations that would reach the national and local levels to facilitate the cultural inclusion of Muslim immigrants. Furthermore, even if the EU had suggested better policy planning in accordance with its conceptual vision of the intercultural dialogue, it would have a character of trans-culturalism, according to which the Muslim immigrants should learn and comply with European universal values, as also the national norms of the Member States. So,

at this final point, the reference is made to the individual transformation, which, again, is a primary incentive of hybridisation.

6.4. Concluding remarks on the EU's 'soft policy' assessments

The European Union is a strictly institutionalised organisation with the supranational and intergovernmental capability of influencing policymaking in various areas. Apart from its exclusive legal competencies, where the EU can make 'hard laws' which the Member States are bound to, it possesses the non-binding policy instruments known as 'soft laws'. The 'soft laws' are recommendations or guidelines which contains the EU's vision regarding particular problems and suggests to the Member States how to deal with the challenges in more effective and efficient ways. Though scholars argue that such 'soft policy' instruments have symbolic character and cannot influence the policy outcome at the national level, they do give the EU access to the field of immigrant integration, intercultural dialogue, and education, which come within the responsibility of the Member States. Over the decades, the EU's 'soft policy' mechanism expanded to such a scale that now the EU can initiate multiple programmes and funding methods to cope more effectively with the challenges common to all Member States. This aspect became a ground of this dissertation in order to draw attention to the EU's 'soft policy' instruments regarding Islamophobia and the cultural integration of European Muslims. The findings of the analysis in this area lead to a twofold criticism the of EU's approach.

First, even in the non-binding 'soft law' formulations, the EU theoretically possess the capacity to assess any problem in its full scale and suggest to the Member States a uniform, detailed action plan on how to address the challenge. However, neither in the aspect of combating Islamophobia nor for facilitating the cultural integration of European Muslims, the EU has drafted recommendations or guidelines, in accordance with which the Member States can judge and decide on their own national action plans. The EU's reference in generic terms to the threat of Islamophobia or the problem of integration means an acknowledgement of the existing challenges at the community level but does not constitute a 'soft law'. The EU could be effective in this field by drafting actual recommendations on how to counter the anti-Muslim propaganda in media, empower Muslim immigrants, and plan programmes, which would raise positive awareness about Muslims. However, the 'soft laws' of the EU do not specifically target these problems.

For example, the EU appointed the coordinator for anti-Muslim hatred, who has the mission of raising recognition of how dangerous anti-Muslim hatred is, but even one dedicated person cannot deal with the numerous problems, especially when the mandate of such a coordinator is limited to reporting. Meanwhile, the Member States do not have a mechanism to record Islamophobia, and, at a local level, the police forces do not receive relevant training on how to deal with the cases of anti-Muslim hate speech and hate crimes. Yet, the best elucidation of EU's reluctance to apply its 'soft policy' instruments effectively is the absence of a working definition of Islamophobia till this time, whereas scholars, as well as EU agencies, have alerted the Union about the threat of Islamophobia over the past two decades. So, a counter-argument is that the European Union's 'soft laws' cannot be an effective policy response to the challenges of Islamophobia and migrant integration as they have symbolic character and do not mean much, because the EU has failed to develop an effective 'soft policy' mechanism even within the framework of its 'soft law' competences.

On the contrary, the EU may lack a strategy to combat Islamophobia but could initiate certain actions in the field of immigrant integration like educational programmes and intercultural dialogue platforms that would raise positive awareness about Muslims, prevent prejudices and racial or xenophobic attitudes towards them. Such policy instruments could indirectly eliminate or decrease Islamophobia in Europe. However, the research revealed that has the EU has not, in this respect, drafted actual recommendations. It has made a general reference to multicultural education and the need for intercultural dialogue, but it lies with the Member States as to what they do and how they address these questions. Hence, the criticism of the EU's 'soft policy' approach towards Islamophobia and Muslim integration builds upon its reluctance to suggest a uniform action plan to the Member States regarding the abovementioned topics, which would guide their national policies.

Second, the problem is not just the inaction or irrelevant action of the EU, but also the peculiar character of its policy initiatives, which express the vision of the EU towards Islamophobia and the cultural integration of European Muslims favouring the model of cultural hybridisation. The illustration of such an assessment is the EU's emphasis on immigrants' obligation to respect European values and national norms. Some may argue that there is nothing that is anti-multiculturalist in the EU's initiative that newcomers or EU citizens with migration backgrounds respect the national norms and European values of the societies they live in. Furthermore, respect for these norms and values builds the cornerstone of equal citizenship.

However, this appears to be a more complex question. As discussed in the methodology section, the national laws in Western Europe are designed to uphold secularism; hence, a Muslim who respects this kind of national norms and values modifies his/her religiosity and cultural identity to the European one. He/she becomes a hybrid Muslim.

Therefore, despite the symbolic character of the EU 'soft law', it still could hypothetically play a significant role to facilitate a particular model of Muslim cultural integration and strengthen the combat against Islamophobia. In fact, the EU does not use its 'soft policy' mechanism on a full scale and is reluctant to target the actual problems of anti-Muslim hatred and Muslim cultural inclusiveness. Though the EU lacks the relevant policymaking instruments, the merit of its reference to the educational programmes and intercultural dialogue in a generic manner indicates that it favours the cultural integration model of hybridisation in terms of European Muslims.

VII. Conclusion

The study of the policy of the EU towards Muslim cultural integration and combatting Islamophobia took an interdisciplinary perspective, combining political sciences with anthropology. The significance and the relevance of the research rest upon the following sequence of circumstances: A bulk of previous studies revealed increased Islamophobia and cultural repulsion of Muslim immigrants and minorities in European societies. While the number of Muslim populations in Europe is increasing, Europe has become more Islamophobic. The culturally diverse European community at large does not have a prospect of a future if tolerance, equality and multiculturalism fail to prevail. As the problem has been acknowledged and embracement of European Muslims does not have an alternative in the liberal democracy, it should be the concern of academic scholarship to examine the policy responses of the European governments to this challenge, identify policy weaknesses and offer advice. However, the previous studies also indicated that European countries and local governments are not efficient to ensure Muslim cultural integration and uproot Islamophobia in society. This raises the responsibility of supranational organisation such as the EU to take actions against it, support Member States in combatting Islamophobia and facilitate Muslim cultural inclusion in the European societies. Therefore, the study of the EU's relevant policy is significant.

However, there is a gap in the literature in respect to the role of the EU to cope with the problem of Islamophobia and Muslim cultural integration in Europe. Scholarly debates focus on the conceptual study of Islamophobia and cultural integration, discuss the coining of Muslimness as a problem in European societies and make a generic reference to the need for the EU's greater involvement in combating Islamophobia. Nevertheless, the comprehensive study of EU-level policy response to the threat is out of scope. Furthermore, legal and policy experts make a reference to the competencies of the EU and imply its lack of policymaking powers in this domain. With this in mind, the dissertation possesses a significant value as it initiated the EU policy study from the anthropological perspective, elucidated the inevitability of the EU's involvement and its competence to act if there is a will.

The main merit of the research lies in its approach and findings. It took the research perspective that if there is a problem, then there should be a solution. An overview of literature about Islamophobia and the theories of cultural integration showed the complexity of the phenomena and the variety of approaches the policymaker may take to address them. Nevertheless, the optimal solution is that Islamophobia should vanish from the everyday life of

European people so the Muslim cultural or religious freedom remains intact and the cultural mosaic of Europe in the twenty-first century should embrace Muslim cultural identities. Primarily, this implicates the responsibility of the EU to act in the spirit of multiculturalism. Hence, the research questioned how the EU addresses Muslim cultural integration in European societies and how it combats Islamophobia.

In response to this, any policy actor in the field of immigrant's cultural integration and combatting Islamophobia may carry out the policy measures which sufficiently or insufficiently address the problem. At the same time, schematically, those policy measures may fit within one of the three main cultural integration models: multiculturalism, hybridisation or assimilation. Though the range of hypothetical variations is broad, it was anticipated that the EU favours the multicultural model of cultural integration and combating Islamophobia. In the liberal-democratic societies, which is the main value of European societies, a multiculturalist model is a desirable form of coexistence in the culturally diverse Europe. It does not undermine minority cultures and could entitle European Muslims with all rights to maintain their traditional cultural identity.

Having said that, it has been initiated data collection in the area of EU legal and 'soft' policies related to Muslim cultural integration and combatting Islamophobia. Information has been obtained from the Eura-Lex, official page of the EU and the official page of the European Commission in three main domains: anti-discrimination and human rights laws, education and culture, integration of third-country nationals. After the review of obtained data, the method of content analysis has been applied to examine the entire text of relevant official documents and interpret their discourse for the purpose of the research.

According to the research objectives, which implicated the research questions about that how the EU addresses Muslim cultural integration and Islamophobia, it took a form of descriptivism. However, it also provided for the policy assessments in the anthropological perspectives. Eventually, it led to the following research findings:

First, despite the matter of competencies, in respect to the principle of subsidiarity, the EU has adopted laws that guarantee the protection of human rights within the community legal system. This implicates the Charter of Fundamental Rights and several directives, which guarantee the freedom of religion, equality and non-discrimination of individuals on any grounds, including Muslims and their cultural or religious rights. Thus, the EU has a legal policy framework that constitutes a fundament of EU policy measures to take actions against Islamophobia and protect the cultural freedom of Muslims in the European societies on its

territory. However, the existence of the EU's relevant legal framework does not automatically mean its efficiency. On the basis of the peculiar legal nature and shared responsibility with the Member States, the applicability of those EU laws to Muslim individuals are contested. The prevalence of the Member States constitutional traditions and national norms, which is recognised under the EU community law, provides for the limit of Muslim religious expressions such as religious symbols for the purpose of secularism. On the contrary, Muslims enjoy the same human rights protection as any other EU citizen implicating the prohibition of hate speech and hate crimes, non-discrimination and freedom of religion. Nevertheless, the research revealed that, as depicted in the reports of the European Commission, practical enforcement of those laws is also problematic since some Member States lack a systematic approach to these issues and law-enforcement bodies at the national and local level are not trained to respond those violations properly. In this respect, the criticism of the EU refers to its reluctance to ensure the uniformity of laws impacting the cultural and religious freedom of Muslims in Europe.

Second, laws exist so individuals can find the remedy for the violation of their rights, but the prevention of such violations is equally significant. The EU law on non-discrimination, ban of hate speech and hate crimes against Muslims make certain forms of Islamophobia punishable, but cultural integration of European Muslims takes more than this. The host society should learn about Muslim cultural traditions and respect them. With this in mind, the research focused on the 'soft policy' of the EU implicating raising cultural awareness of both parties of the integration process. It revealed that the EU supports intercultural education and intercultural dialogue between immigrants and the host European societies. However, it is a matter of consideration that the fundament of intercultural education, as well as intercultural dialogue, is that both parties should find a cultural bond that unifies them within a single society. The EU incited that such a cultural bond should be the respect to the European values and national norms. This means Muslims should modify their traditional identity to the European and national values of the host society. In line with this, the programs targeting intercultural dialogue and intercultural education are oriented at popularising the European cultural heritage and the culture of the Member States, whereas the cultural values of Muslims remain in the shutter. This impels it to claim that the policy approach of the EU towards cultural integration of Muslim immigrants is neither assimilative nor multiculturalist and it seems rather oriented at the hybridisation of the European Muslims. Following this, the combat against Islamophobia also has a specific pattern. Initially, the concept of Islamophobia is not coined in the EU policy discourse, and there are certain forms of Islamophobia such as anti-Islam bigotry or discrimination against Muslims in the name of secular laws, for which Muslims cannot find

remedy in the EU legal context. Though to a certain degree, the law and policy of the EU forbid discrimination and hate expressions against Muslims, they are obliged to hide their religious and cultural identities and act like other members of the European societies, so they do not become the victim of Islamophobia. However, considering the theories of Islamophobia and cultural integration, the finding that the EU's policy towards European Muslims is rather hybridisation oriented leads to further anthropological assessments.

It appears that the EU has a three-level approach towards the cultural integration of European Muslims. They should comply with the norms and values of the host society and find common cultural grounds to perform within the single society on the local level, which implicates the city or village. On the second level, Muslim immigrants should share national norms and values. Developing the sense of belonging to the common European community comes on the third level, and it considers respect to the European values. On each level, Muslims have to change their cultural behaviour if it contradicts the host societies' norms and values. Though this seems rational and rightful that immigrants have to comply with the established legal and social system in the country of their destination, what does not seem right is to coin different cultural or religious identity as a problem and put the burden on immigrants to undergo the process of cultural change. Such a policy is not aimed at comforting existing multicultural reality and depicting it in the legal system, but to change the cultural mosaic by forcing minority groups to modify their cultural behaviour to the majority cultural standards. And yet, none of this would matter if European and national values were some universal principles of human rights, but European countries become more and more secular. It is the principle of secularism that coins Muslimness as a problem, and the EU seems to favour it. On the contrary, the EU acknowledges that Muslim cultural integration is doomed to fail if the representatives of the host societies are Islamophobic. Hence, it addresses the responsibility of the host society to be tolerant. However, the toleration is being stretched over those manifestations of Muslimness, which is compatible with the universal European value and national norms, but beyond it, the members of the host society by means of intercultural education and intercultural dialogue are asked to transmit the values of the majority culture to Muslims, so conflicting cultural differences do not become the ground of Islamophobia. Hence, the EU has a twofold approach in combating Islamophobia as it partially favours the protection of Muslim cultural and religious manifestation, but at the same time considers that European toleration could be curtailed upon Muslim religious traditions, which are not acceptable for the European societies. The key problem of such an approach is that if Muslim individuals do not hybridise, they become victims of segregation.

Thus, the research findings denied the hypothesis of multiculturalism and indicated a hybridisation as a model of Muslim cultural integration and combating Islamophobia favoured by the EU. However, the research approximated the EU's role and strategy with this regard in critical terms, which raises a question, how the EU could become a better changemaker in this area considering its institutional bodies and powers. In response to this, the research suggested some recommendations.

7.1. Recommendations

The EU is *sui generis*. Its establishing treaty provisions are formulated in such a manner that the EU may always find a ground for intervention in any policy area despite the limited legal competencies if there is a will. Hence, it should be willing to prioritise the 'Muslim problem' in Europe and direct all policymaking powers to carry out effective combat against Islamophobia and to grant Muslims and Islam equal place in the European cultural mosaic. Accordingly, the EU could carry out the following steps:

First, the EU should make combating Islamophobia its main priority in the field of immigrants' integration. The theories of Islamophobia elucidated that it is a complex and dangerous phenomenon to be listed as a simple category of racism. The EU should address Islamophobia exclusively in its policy documents., Prioritising the combat against Islamophobia has to start with adopting its working definition in a reasonable time and listing its particular forms of manifestation. It is great hypocrisy to call on the Member States in a generic term to tackle Islamophobia when the EU itself did not come down to the working definition. Anti-Muslim discrimination, anti-Muslim hate speech, and hate crimes are certain forms of Islamophobia addressed separately in various EU documents, but for a complete image, all parts of the wooden puzzle should be put together. Moreover, it is not efficient to address anti-Gypsism, anti-Semitism and Islamophobia altogether within a single document. This indicates that the EU does not take into consideration modern anthropology. Despite some resemblance, Islamophobia is not the same as anti-Semitism or anti-Gypsism. So, the European Commission should cooperate closely with anthropologists in this field and adopt a separate policy on combating Islamophobia.

Second, the EU has a general policy approach towards the integration of third-country nationals, which unifies all kinds of groups with Muslim or non-Muslim origins. The policy of

'all size fits everyone' does not seem efficient. The cultural challenges of integration needs are not similar for all categories of immigrants. The EU should develop a tailor-made policy for the immigrants of Muslim and non-Muslim origins, as well as take into consideration the longevity of their residence on the territory of the EU. The newcomers and those individuals who are the second or third generation of immigrants and still fail to develop a belonging to the host society needs a different type of support. Therefore, it is recommendable that the EU develops a tailor-made policy approach to different categories of immigrants and sets guidelines to the Member States to consider this aspect in drafting their national immigrant integration policies.

Third, the policy of interculturalism of the EU rests upon the idea that national cultures of the EU Member States share a common cultural heritage that reveals a European resemblance, a common family link, which is a fundament of their belonging to the big European family. Such an approach indicates that a big minority of Muslims who live on the territory of the EU and do not share a common history or cultural heritage with European nations remain beyond considerations of being the members of the European family. Their path to belonging to the European family follows hybridisation to become like Frenchmen, Germans or Danes, and after that, they become an accepted member of the European family. In the worst case, Muslims will never succeed in becoming Europeans because they belong to Islam and non-European origins, which again leads to their segregation. With this in mind, the EU should reconsider its intercultural policy and draft the strategy of European cultural integration in the way that Muslim minorities do not become outsiders. This could become possible when the EU recognises that Islam is a part of modern European cultural mosaic and Muslims who respect universal values of human rights and democracy are as much Europeans as others. In other words, the European identity marker should become an individual commitment to human rights and freedoms, democracy and the rule of law, and not an aspect of interculturality.

Fourth, the EU's approach that the national law of secularism always prevails coins Muslim religiosity as a problem and puts European Muslims in a discriminative condition compared to others who are non-Muslims. A dangerous trend of secularisation in the social aspect refers to the ban of religious symbols that forces Muslims to disguise their religious identity at schools, at universities or at workplaces. This deepens the segregation and the cultural conflict. The EU should pay attention to the threat of uncontrolled secularism and its weaponisation to repulse Muslims. It should issue a recommendation to the Member States that the principle of secularism, which slowly overtakes all aspects of human life and banishes religiosity, should

not become a ground for antagonism. Muslim women and men should not become estranged in social life because of wearing a headscarf or other harmless religious symbols.

At last, the EU should mobilise all resources and political powers to promote multiculturalism and the acceptance of cultural differences. What Muslims believe in or how they dress up should not become a ground of hatred and discrimination. The EU should deepen the cooperation with interested groups and stakeholders at regional, national and local level to raise awareness about Muslim culture and religion, as well as combating misperceptions and stereotypes about them. The ‘soft policy’ of the EU should aim at comforting multiculturalism to decrease social tension and segregation of Muslims in European societies.

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