Comparing Britain and the Netherlands: The Burqa Ban as Consequence of a Shift from the Policy of Multiculturalism Towards a Policy of Assimilation

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Content

List of Abbreviations

Chapter Two: Dutch Political Parties

CDA:	Christen-Democratisch Appèl (Christian Democratic Appeal)
CU:	ChristenUnie (Christian Union)
D66:	Democraten 66 (Democrats 66)
FVD:	Forum voor Democratie (Forum for Democracy)
GroenLinks:	(GroenLinks)
LPF:	Lijst Pim Fortuyn (Pim Fortuyn List)
PVDA:	Partij van de Arbeid (Labour Party)
PVV:	Partij Voor de Vrijheid (Party for Freedom)
SGP:	Staatkundig Gereformeerde Partij (Reformed Political Party)
SP:	Socialistische Partij (Socialist Party)
VVD:	Volkspartij voor Vrijheid en Democratie (People's Party for Freedom and Democracy)

Chapter Three: British Political Parties

BNP:	British National Party
Conservatives:	Conservative and Unions party
EDL:	English Defence League
Labours:	Labour Party
UKIP:	UK Independence Party

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Abstract

This paper will focus on the concept of multiculturalism and its approach to Muslim minorities in several Western countries. Even though many more forms exist, a look will be given at two specific forms of multiculturalism, namely multiculturalism as adaptation and multiculturalism as assimilation. The purpose is to give insight into the connection between multiculturalism and terrorism and how this could have negative effects on minorities. In order to prove this, this paper will focus on a specific set of public debates, namely the debate whether to ban the burqa. Since both the Netherlands and Britain claim to be multicultural, and since the Netherlands eventually implemented this ban but Britain thus far did not, a look will be given why this is the case. Specifically, the main question throughout this paper will be: Why did the Netherlands choose to implement the burqa ban in 2018 while Britain so far did not even though both countries are multicultural? For both cases, the same four aspect were used in order to make a valid comparison. The theoretical debate will outline the word multiculturalism as used throughout this paper, the link between multiculturalism, assimilationism and terrorism and this will be complemented with the theory of Charles Taylor and his politics of recognition and Will Kymlicka and his minority rights. After this, the scholarly debate on the burqa ban will be outlined. Chapter two will be focusing on the Dutch case. As became apparent, 9/11 proved to be the turning point for the multicultural policy executed and the assassination of Pim Fortuyn and Theo van Gogh proved to be the start of the development of the debate. In the Netherlands, a shift occurred from a policy of multiculturalism as adaptation towards a policy of assimilation. In this context, the burqa ban was able to be implemented. Chapter three looked at the British case where something different could be seen. Here, 9/11 also proved to be a backlash in the idea of multiculturalism and the terrorist attack on 7 July 2005 proved to open up debates in Britain. However, these events were not critical in order to implement a ban. Even though the policy of multiculturalism did know some hard times, politicians never fully distanced themselves from this policy and never became assimilative. This difference with regard to the Netherlands is the reason why the burqa ban thus far is not implemented in Britain.

Introduction

Nowadays, most countries are culturally very diverse and only in a few exceptions one could speak of an ethnonational homogenous population or of a language shared by all citizens.[1] In order to describe and explain these different cultures within a given bounded territory poses is used which is better known as multiculturalism. The idea of multiculturalism is, amongst other things, that 'different cultures have something important to say to us and that there is a richness in cultural diversity that expands our range of human possibilities'[2]. Apart from the enrichment of these minority groups to the majority culture, however, this diversity also contains certain problems. As Kymlicka notes, '[m]inorities and majorities increasingly clash over such issues as language rights, regional autonomy, political representation, education curriculum, land claims, immigration and naturalization policy, even national symbols, such as the choice of national anthem or public holidays'[3]. All of these problems, and more, produce tensions and raise difficult questions about how to treat and approach minority groups in multicultural societies. This is, in part, due to the fact that a clear description how one would see a multicultural society is lacking and different countries have different ideas about how a multicultural society should look.[4] Even though many different approaches exist with regard to the concept of multiculturalism and how this should look, two different approaches deserve special attention due to their importance to this paper. These approaches could be seen as assimilation on the one hand, and adaptation on the other. The idea of assimilation was a guiding idea in 20th century America where minorities were expected to assimilate to the majority culture and to create a national and ethnic homogenous America.[5] This idea of assimilation is also described through the metaphor of the so-called "melting-pot" where different minority cultures mix into the dominant majority culture. However, as will be argued, most scholars would agree that this is not the best form of multiculturalism, even if it is a popular idea in the political discourse. The melting pot, it is argued, is likely to produce a situation in which

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1   W. Kymlicka, *Multicultural Citizenship: A Liberal Theory of Minority Rights* (New York 1995) 1.
2   G.W.G. Leane, 'Rights of Ethnic Minorities in Liberal Democracies: Has France Gone Too Far in Banning Muslim Women From Wearing the Burqa?', *Human Rights Quarterly* 33 (2011) 4, 1032-1061, 1048.
3   Kymlicka, *Multicultural Citizenship*, 1.
4   D. Hartmann and J. Gerteis, 'Dealing with Diversity: Mapping Multiculturalism in Sociological Terms', *Sociological Theory* 23 (2005) 2, 218-240, 219.
5   C. Hirschman, 'America's Melting Pot Reconsidered', *Annual Review of Sociology* 9 (1983) 397-423, 397.

minority groups feel dominated and suppressed. On the other hand, another idea of multiculturalism can be seen described through the metaphor, used by Will Kymlicka, of the "ethnic mosaic". He argues that "ethnic mosaic' carries the connotation of respect for the integrity of immigrant cultures'[6]. The idea is that cultural minorities should be able to maintain their own identities. There should be no assimilation of minority cultures in the dominant majority culture but they should adapt to a certain extent.

When one talks about multicultural forms of assimilation or adaptation of minority cultures, different groups could be considered. This paper will devote attention to the relation between religious minorities and multiculturalism. To be more precise, the main focus will be on how the idea of multiculturalism has been applied to Muslim minorities in several Western countries. According to Paul Statham, in the second half of the 20th century, different Western countries made different attempts in order to give Muslim minorities rights so that they could more easily adapt to the majority culture without losing all ground with their own culture.[7] This, in turn, should enhance the idea of multiculturalism. However, as Statham also notes, this idea changed rapidly, especially after 9/11 and other terrorist attacks. By then, '[i]nstead of celebrating diversity, assimilative cultural demands – language skills, knowledge of national culture, citizenship rituals – are the requirements for migrants in recent policy thinking'[8]. The focus is not so much on adaptation anymore. Rather, the focus is more on assimilation.

According to many observers, the terrorist attack of 9/11 seems to be a critical point in the idea of a multicultural policy. After this event, Muslim minorities increasingly became the target of criticism in society. This transition will be the focus of this research paper. In order to trace this devilment in the discourse around Muslim minorities in multicultural societies, this paper will focus on a specific set of public debates, namely the discussion around the idea of a ban that affects wearing the burqa and niqab in public. In Europe, multiple countries considered implementing a burqa ban. France can be seen as the forerunner in this regard. In France in 2010, after years of debate, this ban was approved. It is notable that France has taken a decidedly assimilationist approach to its Muslim population. Indeed, France is sometimes taken as one of the main examples of the assimilationist model. Nevertheless, this idea of banning the burqa

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6   Kymlicka, *Multicultural Citizenship*, 14.
7   P. Statham, et al., 'Resilient or Adaptable Islam? Multiculturalism, Religion and Migrants' Claims-Making for Group Demands in Britain, the Netherlands and France', *Ethnicities* 5 (2005) 4, 427-459, 428.
8   Statham, et al., 'Resilient or Adaptable Islam?', 428.

spread through different European countries afterward, even to those that had previously espoused a multiculturalist approach.[9]

One such country was the Netherlands. In 2000, the face veil was first being introduced in debates but no serious ban seemed to make its way in the Dutch society. However, since 2005 a shift occurred where the debate started to become serious. From 2005 onwards, more people would argue in favor of a burqa ban.[10] Quite recently, in 2018 in the Netherlands, the burqa ban was officially approved by the Dutch government.[11] Meanwhile in Britain – another country that takes a multiculturalist approach – similar debates took place. Indeed debates have existed on this topic since 2006 at least. But Britain has not implement this law.

How can we explain the different approaches to the Burqa ban in two countries that have apparently embraced the logic of multiculturalism? Does it have something to do with their different approaches to structure a multicultural society? This paper proposes to investigate this question. It presents a comparison of two cases of multicultural societies debating a proposed ban on the Burqa. It is hoped that comparing these two cases will present insights about the concept of multiculturalism in general.

Specifically, the main question throughout this paper will be: Why did the Netherlands choose to implement the burqa ban in 2018 while Britain so far did not even though both countries are multicultural? Since scholars have pointed out that the 9/11 terrorist attacks have had a significant impact on multiculturalism, this paper will go on to ask what role terrorist attacks have played in shaping the debates about the burqa and multiculturalism in the two countries being studied. As will be discussed, this question provides insight in what effect terrorism and Islamophobia could have on the policy of multiculturalism and how minority communities are being targeted as scapegoats as effect of terrorist attacks. This question, then, is important because it should provide more insight into the connection between multiculturalism and terrorism and how this could have negative effects on minorities. The paper argues that there is a significant link between the terrorist attacks and the rise of the debates on the burqa in both countries. On the surface, it seems that debates thus far are focused

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9   I.U.B. Syed, 'Forced Assimilation is an Unhealthy Policy Intervention: The Case of the Hijab Ban in France and Quebec, Canada', *The International Journal of Human Rights* 17 (2013) 3, 428-440, 430.

10 A. Moors, 'Face Veiling in the Netherlands: Public Debates and Women's Narratives', in: E. Brems (red), *The Experience of Face Veil Wearers in Europe and the Law* (Cambridge 2014) 19-41, 20-21.

11 P. van den Dool and M. Geels, 'Ook Eerste Kamer keurt boerka-en nikabverbod goed', NRC, 26-06-2018, https://www.nrc.nl/nieuws/2018/06/26/ook-eerste-kamer-keurt-boerkaverbod-goed-a1607978 (accessed on 08-02-2019).

on questions about whether the state could implement this ban based on the basis of gender and group equality and if it would have positive or negative implications.[12] In addition, these debates focus on security reasons, physical and mental health and the idea of social isolation. But what most of these arguments seem to neglect, and what will be put forward throughout this paper, is that these arguments all seem legitimate but are not the core of the debate. Instead, the core of the argument lies in the historical context in which these debates take place, a period marked by terrorism. Terrorist attacks have in turn changed the way in which the government thinks about the way multiculturalism fits within their country.

This paper will present a historical analysis of the debates surrounding the burqa ban and multiculturalism and the run up to this ban in two countries. It will reflect on how the problems of multiculturalism are discussed in the context of these debates. The time-span of this paper will be roughly from the 1990's until the passing of the burqa ban in the Netherlands in 2018. As will become apparent, in the '90's the term multiculturalism was widely accepted in both Britain and the Netherlands and therefore marks a good starting point. Throughout, several critical points will be highlighted. One could think of 9/11, the bombing of the metro station in London in 2005 and the assassination of both the Dutch Theo van Gogh and Pim Fortuyn.

The theoretical debate will start by outlining the use of the word multiculturalism in this paper. After this, a small contribution will be dedicated to the theory on the link between multiculturalism, terrorism and assimilation. This will be complemented by the theory of Charles Taylor and its politics of recognition and Will Kymlicka and its theory on minority rights. After this, the focus will be on the theory existing about the pros and cons of implementing the burqa ban. This, in turn, will be connected to the debate on multiculturalism.

After the theoretical debate, chapter two will be looking at the case of the Netherlands. The sub-question to be answered here is the following: How does implementing the burqa ban fit into the Dutch perception of having a multicultural society? A look will be given on how the Dutch politicians view the policy of multiculturalism and how this ban could be placed within this vision. In this chapter, a look will be given at four aspects. The first aspect will be an outline of the historical overview of the debates. There, not only the development of the idea of

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12 For examples see, amongst others: E. Howard, 'Banning Islamic Veils: Is Gender Equality a Valid Argument?', *International Journal of Discrimination and the Law* 12 (2012) 3, 147-165; E. Spohn, 'Sisters in Disagreement: The Dispute Among French Feminist About the "Burqa Ban" and the Causes of Their Disunity', *Journal of Human Rights* 12 (2013) 2, 145-164.

multiculturalism in the Netherlands will be discussed, it also gives a historical overview of the way the debate on the burqa ban developed. The second aspect will focus on the question when this debate takes place. Important to see is whether this debate evolved around a time of terrorist attacks. The third aspect will be sketching the arguments used throughout this debate and the parties that got involved. The final aspect will analyze the arguments made in section three and will look at what kind of arguments these are. Are they more multiculturalist or more assimilationist? Chapter three, that discusses the case of Britain, will look at the same aspects as used throughout chapter two in order to make a valid comparison between the two countries. In the Netherlands the ban was eventually implemented but in Britain, no agreement is reached between politicians even though debates existed since at least 2006. However, in 2010, immigration minister Damian Green opposed a ban because it would be 'rather un-British' to implement this[13] and in 2017, Theresa May declared that she opposed a burqa ban.[14] But why is this? The main question throughout this chapter will be: How does opposing a burqa ban fit into the British perception of having a multicultural society? Also here, a look will be given on how politicians view the policy of multiculturalism and how this ban could be placed within this vision. The first section, then, will outline the historical context of the debates on both multiculturalism and the burqa ban. The second section will look at the question when this debate on the burqa ban started to take place and if this was around the time of terrorist attacks. Section three will be giving an overview of the arguments made between different people and parties. Because they still did not decide whether the ban should be implemented, it is interesting to see what arguments are made and if these deviate to those arguments made in the debate in the Netherlands. The final section will analyze these arguments and will consider whether these arguments are more multiculturalist or assimilationist. For both the Netherlands and Britain, the arguments observed will mostly be from politicians as they prove to be important actors in the development of the debate and whether the burqa eventually gets banned. The final chapter, the conclusion, will give an answer to the main question and will outline whether both the Netherlands and Britain could still be perceived as multicultural or whether they should be perceived as something different.

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13 P. Hennessy, 'Burqa Ban Ruled Out By Immigration Minister', the Telegraph, 17-07-2010, https://www.telegraph.co.uk/news/politics/7896751/Burka-ban-ruled-out-by-immigration-minister.html (accessed on 08-02-2019).

14 N. Baker and S. Petkar, 'Lifting the Veil: What is the Burka Ban, What's the Law in the UK, is the Burqa a Religious Requirement and What did Boris Johnson Say?', the Sun, 23-10-2018, https://www.thesun.co.uk/news/2347847/burka-ban-law-uk-religious-boris-johnson/ (accessed on 08-02-2019).

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Finally, there will be a hypothesis central throughout this paper, namely:

Hypothesis 1: *Even though advocates of the ban argue that their main concern is with enhancing society, the hypothesis of this research is that the claims made by advocates of the ban reflect a rather anti-Muslim sentiment that developed in the aftermath of terrorist attacks and can thus be decisive in the shift towards a policy of assimilation and, further, in the implementation of the ban. However, the political landscape decides whether this actual shift and implementation will happen.*

As will be researched throughout this paper, a specific look will be on the impact of terrorists attacks and the policy of multiculturalism on the implementation of this ban.

Methods and Sources

One of the methods used in this research will be a comparative method. This will be done by analyzing and comparing the case of the Netherlands with the case of Great Britain. Even though a lot of debates exist around the concept of multiculturalism in several countries, in the end both the Netherlands and Great Britain claim to have some sort of multicultural society that through the years changed discourse.[15] But why, then, do they both act differently with regard to the burqa ban? This is an interesting issue because they both seem to have the same conditions but they both act differently. Furthermore, this comparison could best be seen as a Millian comparison. This is a type of small-N comparison where a small amount of cases are being investigated. Most importantly with regard to the Millian comparison is that 'it operationalizes variables and explores relationships'[16]. Within this type of comparison, three methods are prominent: Method of agreement, method of difference and method of concomitant variation. Especially this latter is important for this research which 'explores whether the dependent variable varies according to the level of one or more independent variables'[17]. This is exactly

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15 For the Netherlands, see for instance: F. Sleegers, 'In Debat over Nederland: Veranderingen in het Discours over de Multiculturele Samenleving en Nationale Identiteit', *Wetenschappelijke Raad voor het Regeringsbeleid* (Den Haag 2007) 1-95.; For Britain, see for instance: N. Meer and T. Modood, 'The Multicultural State We're In: Muslims, 'Multiculture' and the 'Civic Re-balancing' of British Multiculturalism', *Political Studies* 57 (2009) 473-497.

16 M. Lange, *Comparative-Historical Methods* (Londen 2013) 108.

17 Lange, *Comparative-Historical Methods*, 109.

what this research wants to see: What differences in the independent variables causes whether these countries are willing to implement the burqa ban? However, in addition, another method used in this research is the within-case method; more specific, a historical method. The way this research will be executed is what makes this method important to this research. Firstly, gathering data with regard to the burqa ban is prominent. After this, this data should be properly analyzed, interpreted and, finally, presented.[18] This will mostly be done by studying primary and secondary sources.

Finally, attention should be payed to the primary and secondary sources used throughout this paper. The secondary literature will mostly contain scholarly literature derived from articles and books. This, in turn, will be used in order to create the theoretical debate where the sub-questions can be embedded into. As primary sources, a lot of different sources will be used. These will include sources like opinion polls that should provide insight from the point of view of the citizens within society on how this burqa ban is perceived by them. But it also includes manifestos of political parties and statements made by politicians that will provide sufficient insights about how they perceive the multicultural society and the burqa. Finally, newspaper articles will be used in order to see who is represented by the media and what arguments against and in favor of the burqa ban exist. This diversity of primary sources should provide sufficient insight from different angles and perspectives with regard to the debate.

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18 Ibidem, 12.

Chapter 1: Theoretical Debate

In this chapter, two topics will be touched upon, namely the concept multiculturalism and the debate on the burqa ban. The first part will start with a quick outline of the concept multiculturalism used throughout this paper, followed by a small contribution on the theory of the link between multiculturalism, assimilationism and terrorism, and will afterward be complemented by two theories, namely: The theory of Charles Taylor and its politics of recognition and Will Kymlicka and its theory on minority rights. The second part, then, will focus on the pros and cons with regard to the burqa ban. A look will be given to what arguments are made throughout this debate and how this could be situated against the policy of multiculturalism.

1.1: Multiculturalism

Even though it goes beyond the aim of this paper to give a full overview of the idea of multiculturalism, it is important to define the word multiculturalism as being used throughout this research. As outlined in the introduction, a clear definition of what a multicultural society is and how it should look is lacking which makes it hard to give a clear description. Different countries have different ideas and opinions of how a multicultural society should look. As also drawn in the introduction, amongst other things, a distinction could be made between assimilation and adaptation or, as Kymlicka noted, the "melting-pot" and "ethnic mosaic". However, Douglas Hartmann and Joseph Gerteis oppose both these ideas as they are too one dimensional in their opinion. They argue that 'it becomes difficult (if not impossible) to appreciate the value, benefit, and even functional necessity of difference in modern societies. Social differences in this view may be tolerated, but they are always and inherently divisive and are therefore a threat to social unity'[19]. However, they think differences should be judged from case to case and even though not all diversity should be considered as good, in some cases diversity is good and in multiple cases it is most certainly not always necessarily bad.[20] On the other hand, though, they argue that proponents of multiculturalism and diversity remain too vague about what forms of differences they are defending and, 'more importantly, how order

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19 D. Hartmann and J. Gerteis, 'Dealing with Diversity: Mapping Multiculturalism in Sociological Terms', *Sociological Theory* 23 (2005) 2, 218-240, 220.

20 Hartmann and Gerteis, 'Dealing with Diversity', 220.

and stability can be maintained in the face of increasing diversity'[21]. This brings them to their main point that

> '[i]n short, a fuller conception of multiculturalism must begin by breaking down the false opposition between unity and difference, between solidarity and diversity, or, as it is most frequently formulated in social and political theory, between universalism and particularism. With this in mind, we believe multiculturalism is best understood as a critical-theoretical project, an exercise in cultivating new conceptions of solidarity in the context of dealing with the realities of pervasive and increasing diversity in contemporary societies. Multiculturalism is a response – or a set of responses – to diversity that seeks to articulate the social conditions under which difference can be incorporated and order achieved from diversity'[22].

This idea outlined by Hartmann and Gerteis comes close to what will be used throughout this paper on the topic of multiculturalism. Multiculturalism should not be seen as a fixed idea that should dominate the politics and societal field. Rather, it should be seen in light of the way that people are able to live together and are organized by the state. Multiculturalism should be seen as a term that tries to balance differences in society on the one hand, and order that is achieved from diversity on the other. Even though countries that claim not to uphold a multicultural society (anymore), they still face the challenge of diversity.

In order to build further on this concept, a small contribution must be made with regard to the link between multiculturalism, assimilationism and terrorism. Since this paper is focused on the tension between multiculturalism and assimilation and the role terrorism played between these two, this will be outlined here. After 9/11, a shift seems to have occurred from this idea of multiculturalism as balance of differences in society or as "ethnic-mosaic" towards a policy focused more on assimilation. As Turner argues, '[t]he immediate root of the withdrawal from multiculturalism is urban terrorism, the source of which are global rather than merely local'[23]. Turner looked at the idea outlined by Derrida who explained the idea of xenophobia and becoming the enemy. It comes down to the following: 'If we fail to treat strangers with hospitality, they become aliens. If they are aliens, then they are not regarded as rights-bearing individuals, and we have no responsibility towards them. If we have no responsibility towards them, they remain outsiders, and they become targets of xenophobia. If they are targets of

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21 Ibidem, 220.
22 Ibidem, 221-222.
23 B. S. Turner, 'Citizenship and the Crisis of Multiculturalism', *Citizenship Studies* 10 (2006) 5, 607-618, 617.

xenophobic fear, then they are enemies'[24]. As will become apparent, in the next two chapters, this is also what happened to immigrants and Muslims in Western societies who became alienated within society and felt they did not belong to it. As Turner also argues, '[i]n Europe generally, the Madrid and London bombings, the assassination of Theo van Gogh in Amsterdam, and the riots in Paris in November 2005 have all served to divide communities, enhance the sense of xenophobia and have reduced trust'[25]. This is also agreed upon by Francesco Ragazzi who argued that '[m]ulticulturalism, as an institutional programme of management of ethnic and religious diversity, has fallen out of favour among politicians across Europe in recent years (…) One of the main reasons behind this new stance lies in the alleged connection between multiculturalism and 'homegrown terrorism' – namely a terrorist threat coming from within European societies'[26]. But it is not only the case that a revision on multiculturalism is done because terrorist attacks occurred; it is also believed that the policy of multiculturalism initiates and enhances terrorism within society.[27] It is, thus, perceived as vice-verse. This is one of the reasons that the policy of multiculturalism can shift towards a policy of assimilationism. However, it depends on what country one looks and what other factors are present within this country whether they shift from a policy of multiculturalism towards a policy of assimilation.

In order to deal with multiculturalism as outlined above by Hartmann and Gerteis, and thus to deal with diversity within society, the theories of Kymlicka and Taylor could be helpful. These two theories could complement the policy of multiculturalism in order to partially handle the diversity and in order not to shift towards a policy of assimilation. Starting with Kymlicka, he identifies a negative trend since the end of the Cold war, namely that ethno-cultural conflicts are considered as the most common source of political violence since then. In his book *Multicultural Citizenship: A Liberal Theory of Minority Rights* he tries to outline a new approach in order to be able to investigate this.[28] The main aim of his book is to 'present a more general view of the landscape – to identify some key concepts and principles that need to be taken into account, and so clarify the basic building blocks for a liberal approach to minority

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24 Turner, 'Citizenship and the Crisis of Multiculturalism', 607-608.
25 Ibidem, 615.
26 F. Ragazzi, 'Suspect Community or Suspect Category? The Impact of Counter-Terrorism as 'Policed Multiculturalism', *Journal of Ethnic and Migration Studies* 42 (2016) 5, 724-741, 724.
27 S. Vertovec, 'Towards Post-Multiculturalism? Changing Communities, Conditions and Context of Diversity', *International Social Science Journal* (2010), 1-28, 2.
28 Kymlicka, *Multicultural Citizenship*, 1.

rights'[29]. He argues that, aside from the universal right applicable to every member of society, minorities should receive minority rights with regard to their own community in order to make adaptation more possible.[30]

Taylor's book 'focuses on the challenge of multiculturalism and the politics of recognition as it faces democratic societies today'[31]. He argues that the identity one forms of oneself or as group is not defined in isolation. Rather, the identity is formed in dialogue with others and how others see us and what they want to see in us. This, in turn, means that individuals and groups are dependent on the recognition of others.[32] Non-recognition of individuals and groups can lead to serious problems. Taylor argues that

> '[t]he thesis is that our identity is partly shaped by recognition or its absence, often by *mis*recognition of others, and so a person or group of people can suffer real damage, real distortion, if the people or society around them mirror back to them a confining or demeaning or contemptible picture of themselves. Nonrecognition or misrecognition can inflict harm, can be a form of oppression, imprisoning someone in a false, distorted, and reduced mode of being'[33].

These two theories outlined could be used in order to complement the idea of multiculturalism in order to enhance the position of minorities and, thus, the multicultural society. However, since terrorism meant a major backlash on the policy of multiculturalism, tension started to exist how to treat minorities within society. More often it is seen that immigrant and minorities are asked to assimilate within society, which means a loss of their own culture, norms and values.

1.2: Debate Burqa Ban

Before turning to the debate on the burqa ban, a small note should be made with regard to this notion "burqa ban". Until now, and in the remainder of this paper, the notion "burqa ban" is being coined. However, this notion is a media invention and the actual ban implemented in countries is the face veil ban. Even though the degree of implementation of the ban varies from

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29 Ibidem, 1-2.
30 Ibidem, 6.
31 C. Taylor, e.a., *Multiculturalism: Examining the Politics of Recognition* (New Jersey 1994) 23.
32 Taylor, e.a., *Multiculturalism*, 25-33.
33 Ibidem, 25.

country to country, and even though the majority of the countries did not implement this ban at all, the idea of this burqa ban is that face covering whatsoever is not allowed in public spaces. With face covering is meant people who wear the niqab and burqa in public spaces. Even though it is a face veiling ban, which also includes the prohibition of wearing a balaclava, and is thus 'not openly directed against Islamic practices of covering, the use of the term "burqa ban" in the media coverage around this event is, in substance, justified'.[34] In short, this face veil ban is mainly directed against women wearing a niqab or burqa. This is why the media notion of burqa ban is used throughout this paper.

This idea of whether to implement a burqa ban is provoking a lot of debate between proponents and opponents. For the base of the argument in favor, the article of Phyllis Chesler 'Ban the Burqa?: The Argument in Favor' will be used as she gives a global overview of the arguments used in favor of the ban. Throughout this chapter these arguments will be complemented by other authors. After every argument, counter arguments will be proposed.

One of the arguments in favor of a burqa ban, and one that has mostly been put forward, is that women should not wear the burqa of gender reasons. More specific, 'full-body and face-covering attire hides the wearer's gender'[35]. The idea is that some view wearing the burqa as a form of discrimination against women and argue that this ban should be implemented in order to create and achieve gender equality.[36] This argument of gender equality takes several forms:

> 'One sees the full veil as a separation between men and women. Another considers the veil to be an indication of an objectification of a woman. A third sees in them an attempt to socially exclude women, to make them disappear from the public space. A fourth way gender equality comes into play is through the assertion that face-veils are imposed on women by men or a paternalistic society. A fifth line of argument attacks the full veil because it refuses equal dignity to males and females'[37].

Thus, there are a lot of arguments made based on the idea of gender equality.

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34 U. Spohn, 'Sisters in Disagreement: The Dispute Among French Feminists About the "Burqa Ban" and the Causes of Their Disunity', *Journal of Human Rights* 12 (2013) 2, 145-164, 145.

35 P. Chesler, 'Ban the Burqa?: The Argument in Favor', *Middle East Quarterly* (2010) 33-45, 43.

36 J. Heider, 'Unveiling the Truth Behind the French Burqa Ban: The Unwarranted Restriction of the Right to Freedom of Religion and the European Court of Human Rights', *Indiana International & Comparative Law Review* 22 (2012) 1, 93-129, 93.

37 D. Barton, 'Is the French Burqa Ban Compatible with International Human Rights Law Standards?', *Essex Human Rights Review* 9 (2012) 1, 1-26, 15.

As noted in the previous section, even though this ban includes all face-covering clothing, this ban is specifically directed at the wearing of Muslim face-covering veils. As Erica Howard argued in her article, '[t]his is clear from the fact that, in the parliamentary and wider popular debates, one of the recurring arguments for imposing a legal ban is that this is necessary to promote equality between women and men and to fight the oppression of (Muslim) women who are made to wear religious head or face coverings by men'[38]. Even though Howard does not agree on the idea that banning the face-veil will generate equality, she sums up arguments that others used in order to defend the ban and noted that '[t]his argument that (Islamic) veils go against equality of the sexes and, thus, against one of the fundamental values of Western states, is probably the most widely used – not only by politicians, but also by the media and in general popular discussion – to defend bans on *hijabs, burqas* and/or *niqabs*'[39]. In 2005, the Dutch politician Geert Wilders argued that, amongst other things, the wearing of the burqa must be prohibited because the burqa is perceived as 'a symbol of women's oppression and hence inhumane'[40]. The former French president Nicolas Sarkozy argued in the same line as Wilders as he said that "'the burqa is not welcome on the Republic's territory. It does not fit the idea the Republic maintains about the dignity of the women"'[41]. This wearing of the face-veil is considered as a symbol of oppression because it is imposed on these women by family, friends, communities, men, religious leaders or the state and because the requirements of wearing a modest dress and of correct behavior is higher on women than men.[42] Furthermore, even though this argument is also made by anti-ban supporters, arguments made by pro-ban supporters have strong references to human rights norms: 'They argue in favor of the "burqa ban" by highlighting the principles of the dignity of the person and of gender equality as well as the right of every human being to self-determination and freedom from domination'[43]. As the UN Declaration of Human Rights of 1948 states, by law every human being is equal:

> 'Whereas recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world (…) Whereas the people of the United Nations have in the Charter reaffirmed their faith in

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38 E. Howard, 'Banning Islamic Veils: Is Gender Equality a Valid Argument?', *International Journal of Discrimination and the Law* 12 (2012) 3, 147-165, 148.
39 Howard, 'Banning Islamic Veils', 148.
40 A. Moors, 'The Dutch and the Face-Veil: The Politics of Discomfort', *Social Antrophology* 17 (2009) 4, 393-408, 398.
41 Spohn, 'Sisters in Disagreement', 146.
42 Howard, 'Banning Islamic Veils', 149.
43 Spohn, 'Sisters in Disagreement', 148.

fundamental human rights, in the dignity and worth of the human person and in the equal rights
of men and women'[44]

In sum, pro-ban supporters claim that wearing the burqa is contradicting with this human rights
declaration because they claim that the burqa is forced upon women to wear.

This argument is countered by people and organizations who use this same declaration
to support their argument. The article mostly used by anti-ban supporters is article 18 which
states that '[e]veryone has the right to freedom of thought, conscience and religion; this right
includes freedom to change his religion or belief, and freedom, either alone or in community
with others and in public or private, to manifest his religion or belief in teaching, practice,
worship and observance'[45]. In addition, Amnesty International is against the implementation of
such a ban and they believe 'that such general prohibitions on the wearing of full face veils
would violate the rights to freedom of expression and religion of those women who choose to
wear a full face veil as an expression of their religious, cultural, political or personal identity or
beliefs'[46]. Furthermore, they claim that '[u]nder international human rights law everyone has the
same rights to freedom of expression and freedom to manifest their religion or beliefs; these
freedoms extend to the way in which people choose to dress (…) it is also wrong for women to
be prohibited by law from wearing it [the headscarf or veil]'[47]. The final argument used for the
purpose of this paper is made by Fareen Parvez. She interviewed women who were wearing the
face-veil and wrote down the following:

'All of the women I met in the mosque community of Les Minguettes freely chose to wear the
djelbab or niqab, sometimes even against the wishes of their husbands and families. Thus, the
state's interest in prohibiting the burqa on the grounds of women's oppression is immediately
problematic. To an extent, their antipolitics rejects both state *and* family authority, reconfiguring

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44 United Nations, 'Universal Declaration of Human Rights', (2015)
    http://www.un.org/en/udhrbook/pdf/udhr_booklet_en_web.pdf (accessed on 24-02-2019), 1-63, 1-2.
45 United Nations, 'Universal Declaration of Human Rights', (2015)
    http://www.un.org/en/udhrbook/pdf/udhr_booklet_en_web.pdf (accessed on 24-02-2019), 1-63, 38.
46 Amnesty International, 'Public Statement: Bans on Full Face Veils Would Violate
    International Human Rights Law', (2010)
    https://www.amnesty.org/download/Documents/40000/pol300052010eng.pdf (accessed on 01-03-
    2019), 1-4, 1.
47 Amnesty International, 'Public Statement: Bans on Full Face Veils Would Violate
    International Human Rights Law', (2010)
    https://www.amnesty.org/download/Documents/40000/pol300052010eng.pdf (accessed on 01-03-
    2019), 1-4, 1.

their private spheres toward their own self-practices and recognizing the high stakes of ceding the personal domain to the political'[48].

What this example and these arguments show is that often during this debate, a lot is taken into account except for what these burqa wearing women themselves have to say. This example of Parvez obviously does not represent a whole community. It does show, however, that the opinion of these women should be taken into account more often.

But this is not the only argument in favor of the burqa ban. As Chesler argues, one of the other arguments why to ban the burqa is because of security reasons: 'From a security point of view, face and body covering can facilitate various acts of violence and lawlessness from petty crime and cheating to terrorism'[49]. This is also underlined by Moors who noticed that '[t]hose who argue for a prohibition on the public use of all kinds of face coverings rather than only the *burqa* have used the threat to security and public order as their central line of argumentation'[50]. Here, Moors argues that the ban is mainly targeted at Muslim women but the statement of "all kinds of face covering" used in the previous citation is used because referring to Islamic face-veils would be considered as discrimination on the basis of religion.[51] The wearing of the niqab and burqa are not only related to small crimes but also to acts of terrorism. As Moors noted about people wearing face-covering with regard to security is that '[t]hey are an objective threat because they make camera surveillance far less effective and hinder the detection and prosecution of those involved in criminal acts, as they make it impossible for others to recognise, identify or describe them'[52]. The problem with this argumentation, and what also seems to be the problem for Moors, is that people who are wearing face-covering, and specifically face-covering for religious reasons like the burqa or niqab, are automatically considered as potential criminals and should, thus, not be allowed to wear this in public. A way to see this, though, is to consider this measure as an expression of fear of terrorism. After the fall of the Berlin wall in 1989, the fear of communism was replaced by the fear of the Islam where 9/11 served as a starting point of the war against terrorism when, due to, amongst other

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48 Z.F. Parvez, 'Debating the Burqa in France: the Antipolitics of Islamic Revival', *Qual Sociol* 34 (2011), 287-312, 287-289.
49 Chesler, 'Ban the Burqa, 43.
50 A. Moors, 'The Dutch and the Face-Veil: The Politics of Discomfort', *Social Antrophology* 17 (2009) 4, 393-408, 404.
51 Moors, 'The Dutch and the Face-Veil; , 404.
52 Ibidem, 404.

things, terrorist attacks, a further polarization between Muslim and non-Muslim started to evolve.[53] This point will be returned to.

Other arguments made with regard to security has to do with several scenario's but also other theories put forward by Barton, which he also immediately counters, that are exacerbated and magnified by the media.[54] The first scenario is the fear of people that the person wearing the burqa has weapons underneath it. This scenario is directly countered by Barton by the same argument put forward before that it is discriminating to criminalize a person in advance even though there are no indications for acts of criminality whatsoever.[55] The second scenario has to do with the protection of others and especially children. This scenario has to do with being recognizable in public places for the safety of others.[56] This scenario, too, is countered by Barton by the idea that on base of this claim it is not logical to implement a general ban, as for instance is considered in France. There, it is said that '[t]here is not necessarily an obligation to be identifiable at all times in public'[57]. This seems like a fair point. Why implement a general ban when you only need to be identifiable in certain places. However this could be taken even a step further. Why implement a ban at all when most women are willing to identify themselves, and thus take of their face-veil, when asked.[58] Another fear is the danger of progressive radicalization 'to which the wearing of the face-veil could contribute'[59]. This is also seen in the Netherlands and other European countries where in the context of radicalization and threats of terrorist attacks, this was being connected to women wearing face-veils as they are seen as a threat to the security.[60] However, also this argument is directly countered by Barton himself where he questions whether a general ban on face-veiling would be a proportionate reaction to this fear of radicalization. One of the fears is that 'a ban on religious practice usually sparks new life into marginal movements'[61] which means that a ban on the wearing of a burqa or niqab

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53 Ibidem, 395, 399.
54 D. Barton, 'Is the French Burqa Ban Compatible with International Human Rights Law Standards?', *Essex Human Rights Review* 9 (2012) 1, 1-26, 12.
55 Barton, 'Is the French Burqa Ban Compatible with International Human Rights Law Standards?', 13.
56 Ibidem, 12-13.
57 Ibidem, 13.
58 D. Jongejan, 'Boerkaverbod: belangrijk of onnodig?', Algemeen Dagblad, 23-11-2016, https://www.ad.nl/nieuws/boerkaverbod-belangrijk-of-onnodig~ad58bc3f/ (accessed on 03-06-2019).
59 Barton, 'Is the French Burqa Ban Compatible with International Human Rights Law Standards?', 22.
60 Moors, 'The Dutch and the Face-Veil', 399, 404.
61 Barton, 'Is the French Burqa Ban Compatible with International Human Rights Law Standards?', 22.

could spark new life within these movements. The chance of progressive radicalization is higher when the ban is implemented than by non-implementation. As Moors argues for in the case of the Netherlands, since 9/11 face-covering is linked to the so-called radical, violent Islam. This link is exacerbated by the media where media reports show cases where male terror suspects are trying to escape by wearing the burqa or where women are hiding bombs under their burqa, which all contributes to the feelings of fear. This however, is 'in spite of the fact that wearing a *burqa* or face-veil in a country such as the Netherlands produces heightened visibility rather than invisibility'[62]. In other words, she argues that the idea of progressive radicalization is fed by the media which heightens this feeling of anxiety and fear while the actual threat is less than people think.

        Another argument that pro-ban supporters use is that there are also humanitarian, psychological and other physical and mental considerations. This means that the burqa has serious physical restraints on the women who wear it. A former French parliamentarian, André Gerin, called the burqa a "moving prison".[63] By wearing the burqa 'the wearer has no peripheral and only limited forward vision; hearing and speech are muffled; facial expression remain hidden; movement is severely constrained'[64]. Furthermore, it also has other consequences like the 'burqa wearer may feel that she cannot breathe, that she might slowly be suffocated. She may feel buried alive and may become anxious and or claustrophobic'[65]. Not only this, but also, as Chesler argues, this blocking of the five senses of the burqa wearer can lead to serious feelings of isolation that can be considered as forms of torture. Feelings like these can lead to all kinds of negative psychological feelings – like depression, low self-esteem, dependency, depression, anxieties and aggression – that could be directed against other women.[66] Finally, wearing the burqa or niqab also has negative impacts on the body and on its level of vitamins, where women could severely suffer from vitamin D deficiencies.[67] This is because their skin is not exposed to sunlight due to the garment. Other negative impacts on the body are heart

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62 Moors, 'The Dutch and the Face-Veil', 404.

63 P. Allen, 'Nicolas Sarkozy says the burqa is 'not welcome' in France', *The Telegraph* (2009) https://www.telegraph.co.uk/news/worldnews/europe/france/5603859/Nicolas-Sarkozy-says-the-burqa-is-not-welcome-in-France.html (accessed on 26-02-2019).

64 Chesler, 'Ban the Burqa?', 43.

65 Ibidem, 44.

66 Ibidem, 44.

67 F.Z. Ashni and P. Gerber, 'Burqa: Human Right or Human Wrong?', *Alternative Law Journal* 39 (2014) 4, 231-234, 232.

diseases, particular forms of cancer, chronic pains, eye damage, autoimmune diseases, and chronic fatigue.[68]

Even though it cannot be denied that some of these humanitarian, psychological and other physical and mental restrains and effects are serious and should not be neglected, it is argued that prohibiting women from wearing the burqa can have even more negative effects. Apart from the fact that women are not wearing the burqa or niqab all day everyday but only in public, the effect of not wearing this garment is even worse. When women are prohibited to wear this garment they are not able to go outside anymore which only can have more negative effects on the well-being of this women. These garments could be used for women to go to school or to get a job. By implementing bans on veiling they lose this opportunity: 'they [bans] might restrict their chances of being liberated or emancipated by further isolating these women and girls and by stopping them from taking any part in society at all'[69]. In other words, they will fall into social isolation.

A final argument pro-ban supporters make has to do with social isolation. It is claimed that the burqa is not only harmful to people wearing it but also to others; 'The sight of women in burqas can be demoralizing and frightening to Westerners of all faiths, including Muslims, not to mention secularists'[70]. In addition, Westerners and non-burqa wearers do not always know how to respond to women who are wearing burqa's and might feel awkward. Fareen Parvez notes that '[t]he pity and disdain many feel for these women is a nearly automatic reaction that occurs regardless of the individuals who actually wear the burqa and believe in its purpose'[71]. Apart from the fact that it sometimes makes people feel uncomfortable to see a women in a garment, communication also proves to be hard and especially with regard to education this seemed to be a point of dispute. Face-veiling should be banned, as the argument goes, because wearing face-veils could impede communication, detracts the pedagogical setting, and could cause troubles in the future with regard to internships and future employment.[72] In schools, emphasize is put on non-verbal communication and the idea is that people should see each other in order to read someone's expression. For instance, when girls wear burqa's it is hard for teachers to see whether these children understood the theory explained.

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68 Chesler, 'Ban the Burqa?', 44.
69 Howard, 'Banning Islamic Veils', 160.
70 Chesler, 'Ban the Burqa?', 44.
71 Parvez, 'Debating the Burqa in France', 287-288.
72 Moors, 'The Dutch and the Face-Veil', 396.

However, these arguments seemed to be made more on feelings of fear and insecurity than on pure rationality. This burqa ban, then, can be placed within this context of feelings of fear. It is up to the type of policy of multiculturalism that is executed whether this ban will be implemented. In the remainder of this paper, the multicultural policy executed in the case studies must determine whether this theory is legitimate and whether the burqa ban is a reaction on the type of multicultural policy executed in both countries. This feeling of fear is also fed by the media that, in turn, is also gratefully used by politicians in times of elections in order to gain votes, especially by politicians who are anti-immigration.[73] It is, then, the case for politicians in order to decide whether they give in to these feelings of fear and insecurity, and use this to their own advantage, or whether they fight against this.

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73 K. Ronde and R. Vliegenthart, 'Wilders gebaat bij media-aandacht voor integratie', Kennislink, 23-11-2007, https://www.nemokennislink.nl/publicaties/wilders-gebaat-bij-media-aandacht-voor-integratie/ (accessed on 03-06-2019).

Chapter 2: The Netherlands

In this chapter, a look will be given how it was possible for the Netherlands to come to the point of implementing the burqa ban. Important will be to see whether there is a link between the multicultural policy executed in the Netherlands and the debate on the burqa ban. The sub-question throughout this chapter will be as follows: How does implementing the burqa ban fit into the Dutch perception of having a multicultural society? In this chapter, four aspects will be researched. First, a historical overview of the debates will be given on the policy of multiculturalism executed and the burqa ban. After this, insights will be given on when this discussion took place. Was it around the time of terrorist attacks that this debate started to ignite? Thirdly, the arguments and parties involved throughout this debate will be outlined. Finally, these arguments will be linked to the theoretical debate and looks whether these arguments are multicultural or assimilationist.

2.1: Historical Overview: The Netherlands

The origins and first appearance of multiculturalism in the Netherlands can be traced back to the 17th century. This is because as early as the 17th century, the Netherlands is linked to its tradition of tolerance. There was a tolerant climate with regard to traders, and religious and political refugees were more than welcome. Also, the Netherlands has a rich history of emigration and accepting immigrants. In the 1970s labor recruitment was officially being accepted and supported by the Dutch government in order to fill the shortage of unskilled labor. These immigrants were coming from all over the world – Morocco, Turkey, Suriname, Sri Lanka, Iran, Iraq, Somalia, etc. – and until the day of today roughly 17 percent of the Dutch population has a background of foreign descent.[74] What should also be considered is the Dutch history of the 20th century. Since the Holocaust left its marks in the Netherlands, and the feeling of powerlessness was dominating throughout this period, the Dutch wanted to do something in return to help others, as also immigrant minorities. The immigrant minorities were seen in light of the Holocaust that deserved protection and help from the Dutch.[75] Sniderman and Hagendoorn argue that '[a] societal consensus, at the elite level, was formed in support of multiculturalism – and not just of a symbolic variety. In the Netherlands, as much as can be

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74 P.M. Sniderman and L. Hagendoorn, *When Ways of Life Collide: Multiculturalism and Its Discontent in the Netherlands* (New Jersey 2009) 12-13.

75 Sniderman and Hagendoorn, *When Ways of Life Collide*, 15.

done on behalf of multiculturalism has been done'[76]. All this, plus refugees fleeing their country on political or religious ground, caused the policy of multiculturalism to be adopted in the 1980s.[77] However, this program of multiculturalism really was able to take root in the 1990s. In the '90s, the idea of integration with the preservation of the Dutch cultural identity became the starting point of how to treat immigrants. This pattern could be placed against the background of depillarization. Especially in this context, and even though the rest of the Netherlands was depillarizing, the Muslim community was able to evolve as a new pillar.[78] As will be elaborated on, in the '90s the so-called purple government (social democratic and liberal conservatism) promoted the idea of multiculturalism. The government funded a Muslim schooling system where children were taught in the language of their country of origins and learned about their culture. In addition, '[t]he state also builds separate Muslim housing; provides mass media (including radio and television) dedicated to Muslim interests and concerns; import imams; supports separate social and welfare arrangements for immigrants minorities; and has established a separate consultation system with community "leaders"'[79].

According to Sniderman and Hagendoorn, then, the Netherlands 'has taken the most ambitious policy of multiculturalism. The premise of multiculturalism as a principle is respect for the pluralism of cultures'[80]. This is a very interesting statement, especially in light of the implementation of the burqa ban but also in light of a statement made in the previous chapter that by the fall of the Berlin wall and thus communism in 1989, the Islam replaced the fear of communism with the fear of the Islam. As argued by Irene Stengs, after 2000, multiculturalism quickly started a downward pattern. In the first decade of the 21st century, the question of who should and who should not be part of the Dutch society was asked more often than before with a more intense tone. The Dutch population is increasingly concerned with the question who they are and what it means to be Dutch.[81] On January 24, 2002, politician Jan-Peter Balkenende from the CDA, who would become prime minister of the Netherlands from 2002 until 2010, distanced himself and his party from the multicultural society.[82] A couple of incidents

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76 Ibidem, 15.
77 S.M. Breugelmans and F.J.R. van de Vijver, 'Antecedents and Components of Majority Attitudes toward Multiculturalism in the Netherlands', *Applied Psychology: An International Review* 53 (2004) 3, 400-422, 401.
78 I. Stengs, 'Inleiding: Nieuwe Nederlandsheid in feest en Ritueel', in: I. Stengs (red.), *Nieuw in Nederland: Feesten en rituelen in verandering* (Amsterdam 2012) 9-24, 12.
79 Sniderman and Hagendoorn, *When Ways of Life Collide*,18.
80 Ibidem, XI.
81 Stengs, 'Inleiding: Nieuwe Nederlandsheid in feest en Ritueel', 12.
82 A. van Kessel, 'Vier kabinetten-Balkenende in parlementair-historisch perspectief',

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negatively influenced this idea of having a multicultural society. Obviously, September 11, 2001 can be viewed as the starting point of a shift on the political landscape as the war on terror started to evolve.[83] Apart from a couple of other incidents, like the terrorist attack in London and Madrid, a couple of incidents also happened in the Netherlands that contributed to the development of the debate. On May 6, 2002, the right-wing populist politician Pim Fortuyn, who was rapidly gaining popularity with his manifesto for his party Lijst Pim Fortuyn, was assassinated by the left-wing environmental activist Volkert van der Graaf.[84] One of the aspects of his political philosophy involved a fear for the Islam – Islamophobia. He saw the Islam as a backward religion and culture and wanted to ban this religion in the Netherlands if he was to become prime minister. Van der Graaf saw it as his duty to assassinate Fortuyn for the sake of the Dutch society as he saw Fortuyn as a danger to the Dutch society.

Furthermore, another incident happened that can be linked to the first discussions with regard to the burqa ban. On the 2nd of November, 2004, the Dutch director, actor, writer, columnist, and host Theo van Gogh was assassinated by Mohammed Bouyeri.[85] Together with politician Ayaan Hirsi Ali, van Gogh produced a movie that is called *submission* where the two criticized the Islam.[86] To be more specific, they criticized the way in which a part of the Muslim community linked a specific way to interpret the Koran to female abuse. Van Gogh got shot multiple times and the suspect left two letters, pinned to his body with knifes – one of these letters was directed at Hirsi Ali and contained threats directed at her. Bouyeri, thus, clearly makes a statement that his actions are committed on religious grounds.[87] One of the reactions after this assassination was frustration and anger that was mostly directed against the Muslim immigrants and immigrants with a Moroccan background. Two Islamic primary schools were burned together with mosques.[88] A second reaction was that theories about the irreconcilable

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Christen Democratische Verkenningen (2010) 35-43, 36.

83   Moors, 'The Dutch and the Face-Veil', 397.

84   P.J. Margry, 'The Murder of Pim Fortuyn and Collective Emotions: Hype, Hysteria and Holiness in the Netherlands?', *Etnofoor: Antropologisch Tijdschrift* 16 (2003) 2, 106-131, 106.

85   R. Penninx, 'After the Fortuyn and van Gogh murders – is the Dutch integration model in disarray?', in: Institute for Public Policy Research (red.), *Going Places: Neighbourhood, Ethnicity and Social Mobility* (London 2006) 127-138, 134.

86   A, Moors, 'Gezichtssluiers: Draagsters en Debatten', *Rapport: Amsterdam School for Social Science Research* (31 januari 2009), 1-57, 10.

87   Moors, 'Gezichtssluiers: Draagsters en Debatten', 10.

88   A.C. Korteweg, 'De moord op Theo van Gogh: Gender, religie en de strijd over de integratie van migranten in Nederland', *Migrantenstudies* 21 (2005) 4, 205-223, 205.

relation between Islam and democracies tended to be confirmed.[89] In addition, another reaction was that the Netherlands wanted to protect itself against terror like these which led to the classification of all Muslims as potential offenders in some public debates.[90] So after this happened, tensions between Muslims and non-Muslims further grew. One could see this, for instance, in a reaction by vice-prime minister Zalm in the newspaper the Algemeen Dagblad on the assassination of van Gogh. He stated that the cabinet declares war on Muslim extremism and that extra money will be spend in order to destroy terror used by fundamentalists. Furthermore, a claim is made that Muslims with a double passport, and thus double nationality, will lose their right on the Dutch passport when serious crimes are committed.[91] Apart from the two incidents described, in 2005 another group of seven persons who were terror suspects were arrested in The Hague, which all led to the further polarization between Muslims and non-Muslims.[92]

It was in this climate of terrorist attacks that this debate was able to settle within the Netherlands. In 2000, the first case of banning face-veils in public was discussed. Discussion existed when a student tried to enroll in a training program for pharmacy assistant but was to be denied because she wore a face-veil that troubled communication. However, the Equal Treatment Commission dismissed this case based on the argument that in a multicultural society as the Netherlands, not all people show their feelings through facial expression. But between 2000 and 2005 a major shift occurred and a public debate on the wearing of the face-veil became a topic. In 2003, three Moroccan-Dutch students were denied in school because they wore this face-veil, which was against the policy of this school. This time, the Equal Treatment Commission acted very differently. They supported the actions of this school because it did not target a particular religion, the wearing of the burqa impedes communication, it is hard to identify these students and thus can pose a security threat, and because it hinders future enrollment for these girls.[93] Both parties on the left and the right as Muslim associations supported the right of this school to make this part of their policy.[94] As will be described in section four, Wilders founded his own political party in which he was able to take up his radical vision with regard to the Islam, Muslims and immigrants. In this context, Wilders submitted a

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89 Penninx, 'After the Fortuyn and van Gogh murders', 135.
90 Korteweg, 'De moord op Theo van Gogh', 205.
91 Algemeen Dagblad, 'Zalm: We zijn in oorlog; Regering: terrorisme met wortel en tak uitroeien', 6 november 2004.
92 Moors, 'Gezichtssluiers: Draagsters en Debatten', 11.
93 Moors, 'Face Veiling in the Netherlands', 21.
94 Ibidem, 20-21.

motion in 2005 to ban the burqa and in 2006 he explicitly blamed the multicultural policy in the Netherlands for the bad conditions with regard to integration and immigration.[95] Surprisingly, enough support existed and within a short period the burqa ban tremendously became topic of a public and political debate. Debates lasted until at least 2015 when on the 27th of November, the Dutch House of Representatives (Tweede Kamer der Staten-Generaal) submitted a bill that is better known as the law for partial prohibition on face-covering garments. With a couple of exceptions, article 1 describes the prohibition of wearing a face-covering garment that covers the face in its total or covers the face with the exception of the eyes in public transporting and in buildings of government institutions, educational institutions or health care institutions.[96] If one is not willing to live up to this law, one could expect a fine. This bill was adopted by the House of Representatives on November 29, 2016 and accepted in 2018. In the summer of 2019, this law will officially be of force.

2.2: Context Burqa Ban

In the Netherlands, a couple of trends were present between the 1990s and 2005, when Wilders first submitted his motion. In his doctoral thesis, Rens Vliegenthart set out a study that, amongst others things, researched and reconstructed the way in which immigration and migration was framed in the Dutch public debate. In his research he observes that '[o]pinion makers and politicians appear to agree that a dramatic change in the public debate has occurred, but no research has yet been undertaken to trace exactly when and how this change happened'[97]. A specific look will be given at how the political debate developed and how the media debate developed. He took five frames, of which the two most important for this research are the multiculturalism frame and the Islam-as-threat frame. This second frame means that people fear that the Islam is incompatible with and threatening to the values of Western civilization, that they are afraid of the 'Islamization' of the Dutch society, and fear that special right to Muslims

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95 M. Peltzer, 'Klare Wijn', Geert Wilders Weblog: Partij Voor de Vrijheid, 30-03-2006, https://www.geertwilders.nl/in-de-media-mainmenu-74/nieuws-mainmenu-114/175-ongecategoriseerd/410-klare-wijn (accessed on 07-06-2019).

96 Tweede Kamer der Staten-Generaal, 'Instelling van een gedeeltelijke verbod op het dragen van gezichtsbedekkende kleding in het onderwijs, het openbaar vervoer, overheidsgebouwen en de zorg (Wet gedeeltelijk verbod gezichtsbedekkende kleding)', (2015-2016) https://www.eerstekamer.nl/behandeling/20151127/voorstel_van_wet (accessed on 24-03-2019), 1-2, 1.

97 R. Vliegenthart, *Framing Immigration and Integration: Facts, Parliament, Media and Anti-Immigrant Party Support in the Netherlands* (Doctoral thesis) (Amsterdam 2007), 1-190, 32.

will only segregate society.[98] To summarize some of his findings, in the media, the terrorist attacks of 9/11 caused a great peak in newspaper reports where most focus was on the Islam as a threat to the Western world.[99] But this was also the case in the politics, and from 2002 onwards, most attention went to the frame of Islam as a threat to Dutch identity and values.[100] As he stated, '[i]n both domains, since 2001 there has been an emphasis on immigrant religious culture, equated with Islam that is perceived as a threat to Dutch culture and values and as a principle obstacle to the integration of Muslim migrants'[101]. Also the term multiculturalism was on its detour. Already in 1991, Frits Bolkestein, former politician of the VVD, claimed that Muslims and immigrants should integrate into the Dutch society, because Islam and Western norms and values are incompatible, and should adapt to our norms and values.[102] In 1991, this was quite a radical statement, and the idea of multiculturalism was gaining more strength. However, in 2005, this was a mainstream thought and the idea of multiculturalism was perceived as a failure.[103] Within the politics, throughout the 90s, the idea of multiculturalism gained more prominence:

> 'In the mid 1990s, there was significant political consensus about the policy goals of emancipation and multiculturalism. In 1996, the Minister responsible for Minority Policies, Dijkstal (VVD), even noted that presumably 'We all agree that minorities should be given the perspective of full participation in society and that pluriformity, mutual respect and maintenance of cultural identity, solidarity, tolerance and integration should be the core concepts of our policy'[104].

However, after the elections of 2002, with a new coalition cabinet, the multicultural frame dropped and more often the Islam as a threat frame was coined. This cabinet also talked more in term of assimilation than of integration.[105]

What caused this were a couple of events. As already mentioned, 9/11 marked as turning point in both the media discourse and the political discourse. However, this was only the

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98 Vliegenthart, *Framing Immigration and Integration*, 38.
99 Ibidem, 43.
100 Ibidem, 47.
101 Ibidem, 50.
102 D.J. Eppink, 'VVD leider vindt dat Moslims zich moeten aanpassen; Bolkestein: compromis met rechtsstaat is niet mogelijk', NRC Handelsblad (12-09-1991).
103 Vliegenthart, *Framing Immigration and Integration*, 31.
104 Ibidem, 41.
105 Ibidem, 40-41.

beginning. From this point on, the idea of multiculturalism in the Dutch society started to be on its detour and it made place for a society where Islam more often is perceived as threat. This was only fueled even more after both the assassination of Pim Forutyn and Theo van Gogh. These events proved to be important for the debate to start. Important in creating this image of the Islam as threat was the media, as they after 2001 more frequently started to report about the Islam as a threat. And this, in turn, gave populist politicians a bigger platform in order to create support with regard to their anti-immigrant policies.

2.3: The Dutch Debate

On October 19th, 2005, politician Geert Wilders coined a motion during a debate about the radicalization of Muslims that should prevent women from wearing the burqa in the Netherlands. While publicly advocating in favor of this, he made a direct link between the burqa and terrorism during his interview with the Dutch newspaper De Telegraaf. Here, Wilders expresses his enthusiasm and approval of measures taken in Belgium in order to deal with radical Muslims by banning the burqa. Further fueling his thoughts is that he thinks that the garment does not have any purpose other than spreading fear amongst the population. He is a huge advocate of banning the burqa which leads to him submitting a motion in the parliament to discuss this.[106]

Not only this, also the media as such is playing a huge part in demonizing the Islam and further polarizing Muslims and non-Muslims after these terrorist attacks until the day of today. Partly through the use of the term burqa, stories in the Dutch media get more prominence during debates. Most of these stories are considering male terror suspects who escape by wearing a burqa or suicide bombers that are hiding bombs underneath their burqa.[107] But partly also by giving politicians a platform to advocate in favor of a ban. For instance, this link between radicalism and the burqa is made by minister Vogelaar from the PVDA in the NRC Handelsblad in 2009. Even though only a marginal part of the population is wearing this garment, minister Vogelaar would not consider it as a marginal problem. She claims that the burqa is evoking a feeling of fear and that it is associated with radicalism, which needs serious consideration.[108]

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106 De Telegraaf, 'Burka: Vlaamse gemeente Maaseik succesvol in strijd tegen 'MOSLIM-MASKER', 10 september 2005.
107 Moors, 'Gezichtssluiers: Draagsters en Debatten', 22.
108 NRC Handelsblad, 'Boerka mag niet meer in het onderwijs; Boerkaverbod Kabinet baseert besluit op culturele motieven', 09-02-2008.

This statement is quite questionable in light of a statement made earlier by the minister. A little less than a year before, Vogelaar argued that the burqa should not be a problem in the Netherlands. According to her, this garment worn by Muslim women does not limit the integration.[109] The question is, what happened in this year that she changed mind? Here a shift in mindset occurred where recognition of these special rights to these groups, that were not considered as clashing with the need for integration in the majority culture, made place for the idea that these burqa's are a threat for public safety and should, thus, be abandoned.

Other politicians also argued in favor of a ban. In fact, most parties were willing to agree to implement this ban. A couple of main actors will be highlighted. Just like Wilders, Rita Verdonk, former member of the VVD and founder of the political party Trots Op Nederland, was an advocate of the burqa ban. In 2006, Verdonk argued that the burqa was a symbol of a dichotomy that does not fit the integration of Muslim women and the emancipation of women in general.[110] Also, on the official site of her party, security issues are addressed and it stated that a burqa ban is necessary in order to protect national safety.[111] In addition, former prime minister Jan-Peter Balkenende claimed he felt uncomfortable seeing a women in a burqa once[112] and Wouter Bos, former member of the PVDA, stated that the burqa was a mark of polarization. He thinks the burqa is undesirable and must be forbidden for the sake of public safety. Furthermore, it is important, in his opinion, that the wearing of the burqa will be prohibited in order to straighten the integration policy.[113] Even in 2017, the debate was still vivid. VVD politician Malik Azmani argued that the VVD advocates in favor of a full burqa ban because the wearing of the burqa prevents people to openly interact.[114]

In this debate amongst politicians, not a lot of people argued against this ban. In fact, already in 2008, the not right-wing parties wanted this debate to be over with. These parties lost

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109 Novum Nieuws, 'Nederlanders voor boerkaverbod', Nu.nl, 24-02-2007 https://www.nu.nl/algemeen/987628/nederlanders-voor-boerkaverbod.html (accessed on 31-03-2019).

110 De Volkskrant, 'Verdonk: dragen boerka zoveel mogelijk voorkomen', 20-10-2006, https://www.volkskrant.nl/nieuws-achtergrond/verdonk-dragen-boerka-zoveel-mogelijk-voorkomen~bc34c37f/ (accessed on 26-05-2019).

111 Trotsnl, 'Boerkaverbod', 23-05-2015, http://www.trotsnl.nl/Nieuws/31/Boerkaverbod (accessed on 26-05-2019).

112 C. van der Laan, 'Boerkaverbod is antwoord op gevoel van onbehagen', De Trouw, 11-02-2008, https://www.trouw.nl/home/boerkaverbod-is-antwoord-op-gevoel-van-onbehagen~a8c4400a/ (accessed on 26-05-2018).

113 M. Peeperkorn and M. Sommer, 'Hoofdpijn van de Partij', De Volkskrant, 01-03-2008, https://www.volkskrant.nl/nieuws-achtergrond/hoofdpijn-van-de-partij~bf9944fe/ (accessed on 26-05-2019).

114 Algemeen Dagblad, 'VVD wil een totaal boerkaverbod', 16-02-2017, https://www.ad.nl/nieuws/vvd-wil-een-totaal-boerkaverbod~a4f7eab0/ (accessed on 26-05-2019).

their interest and they wanted to settle the deal for once and for all. This meant that a partial burqa ban as suggested by the cabinet was fine.[115] Just a couple politicians actively argued against it. This is mostly from the Christian Party (CU), that wants to protect the religious rights of this group. On December 20, 2007, they actively claim not to be enthusiastic about the motion. In a statement on their site, they argue that the proposal consists multiple inconsistencies. Also, what is most interesting for this research, is that they question whether the wearing of the burqa poses a real and legitimate threat for security as is mostly argued by pro-ban supporters.[116] Also, Ed Anker, a former member of the Dutch House of Representatives for the Christian Party, claimed to be against the ban. He argues that, even though you might not agree with particular choices made by these women, politicians still have to show their respect for the choices these women themselves made.[117] This argument is also made by Alexander Pechtold, former member of the Democrats 66 Party (D66), who did not want to force women into not wearing the burqa. Instead he wants women to emancipate that they do not want to wear the burqa anymore.[118] However he does not think this should be forced upon them by law and even though he does not agree that women wear this, he is willing to protect the right of these women to do so.[119] By 2008, multiple politicians wanted the debate to end. Like Anker, Jeroen Dijsselbloem, former politician of the PVDA, argued that it is illusive for other politicians to think that with a burqa ban problems surrounding emancipation, suppression of women, and defective rules around immigration will be solved.[120] Some of these politicians, thus, wonder what the impact of the possible ban will be and whether this solves security issues.

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115 D. Stokmans, 'Honderd boerkadragers houden vijf ministers een middagje bezig', NRC.nl, 25-04-2008, https://www.nrc.nl/nieuws/2008/04/25/honderd-boerkadragers-houden-vijf-ministers-een-middagje-11527952-a1052088 (accessed on 26-05-2019).

116 ChristenUnie, 'Inbreng over een eventueel boerkaverbod', (20-12-2007), https://hardenberg.christenunie.nl/k/n6069/news/view/190637/144475/inbreng-over-een-eventueel-boerkaverbod.html (accessed on 26-05-2019).

117 D. Stokmans, 'Honderd boerkadragers houden vijf ministers een middagje bezig', NRC.nl, 25-04-2008, https://www.nrc.nl/nieuws/2008/04/25/honderd-boerkadragers-houden-vijf-ministers-een-middagje-11527952-a1052088 (accessed on 26-05-2019).

118 De Volkskrant, 'Pechtold en Van der Laan strijden om vrijheid van onderwijs', 06-06-2006, https://www.volkskrant.nl/nieuws-achtergrond/pechtold-en-van-der-laan-strijden-om-vrijheid-van-onderwijs~b90eb23c/ (accessed on 26-05-2019).

119 R. Brunsveld, 'Moslima's hebben recht om een boerka te dragen', De Trouw, 26-11-2011, https://www.trouw.nl/opinie/moslima-s-hebben-recht-om-een-boerka-te-dragen~ab969eca/ (accessed on 26-05-2019).

120 D. Stokmans, 'Honderd boerkadragers houden vijf ministers een middagje bezig', NRC.nl, 25-04-2008, https://www.nrc.nl/nieuws/2008/04/25/honderd-boerkadragers-houden-vijf-ministers-een-middagje-11527952-a1052088 (accessed on 26-05-2019).

2.4: Multicultural versus Assimilation

These arguments made, however, could be further analyzed. In what follows, these arguments will be investigated in order to see whether they are multiculturalist or assimilationist. In order to do so, the observation of Annelies Moors will be given as she investigated the situation surrounding the ban.

As Moors argues in her report that investigates questions surrounding the burqa – like who these women are that are wearing this burqa, their motives, their way of participation in society, etc. – is that there is an argument that cannot be suggested as rational and in legal sense does not hold any legitimacy, which is the fear for radical and fundamentalist Islam.[121] She argued that from 9/11 and the assassination of van Gogh onwards, Muslims started to practice a new form of Islam because Muslims felt like they did not belong to the society anymore. Many Muslims experienced that they were all treated the same and as if they were all criminals.[122] This fear for fundamentalism grew throughout the years but is not always supported, as, next to Moors opinion, multiple newspapers also highlight. For instance, in the newspaper De Trouw, it is argued that the motion submitted by Wilders is dangerous for society. Translated, the actual title of the article is that the burqa ban is a consequence of fear and distrust. The author also argues that the dangers are not as big as it seems and are not bigger than the fear itself. Furthermore, the coalition should not give in to this unsubstantiated feelings of fear.[123] In addition, the author argues that a burqa ban is offensive, discriminating, frightening, dangerous, and will stop integration because women are not able to leave their homes.[124] Finally, she wants the politicians to stop this way the society is heading to, which comes forth out of the fear of terrorism that, in turn, comes from the fear for everything that is unfamiliar.[125] Another example comes from an opinion piece in Het Parool, where the author argues against the ban. He argues that with this ban, we force these women to adapt to "our" –

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121 Moors, 'Gezichtssluiers: Draagsters en Debatten', 22.
122 Ibidem, 31-32.
123 S. Terlouw, 'Verbod op boerka komt voort uit angst en wantrouwen', de Trouw, 24-12-2005 https://www.trouw.nl/home/verbod-op-boerka-komt-voort-uit-angst-en-wantrouwen~a58a6f73/ (accessed on 31-03-2019).
124 S. Terlouw, 'Verbod op boerka komt voort uit angst en wantrouwen', de Trouw, 24-12-2005 https://www.trouw.nl/home/verbod-op-boerka-komt-voort-uit-angst-en-wantrouwen~a58a6f73/ (accessed on 31-03-2019).
125 S. Terlouw, 'Verbod op boerka komt voort uit angst en wantrouwen', de Trouw, 24-12-2005 https://www.trouw.nl/home/verbod-op-boerka-komt-voort-uit-angst-en-wantrouwen~a58a6f73/ (accessed on 31-03-2019).

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Dutch – norms and values in public and does not think that a ban like this solves the problem of radicalism and terrorism.[126]

Even though most arguments throughout this debate in the Netherlands are founded on the rhetoric of security issues and fear for terrorism, multiple anti-ban supporters do not consider this as an argument that should be decisive in order to implement this ban. However, this argument is rather based on the feelings of fear and still proved to be decisive in order to implement it. This could be seen in light of the shift from a more multicultural policy towards a more assimilative policy. Critical for this shift to occur was the political context. In the following, this political context will be outlined where a look will be given to the political landscape from the '90s until the implementation, on how politicians talk about multiculturalism and assimilation and how populist were able to gain enough support in order for this ban to be implemented.

After 9/11, people's attitude started to change which one could see in the way they voted throughout the years. If one looks at the way people voted from 1989 onwards, some interesting observations can be made. Before outlining these observations, a remark has to be made with regard to the political parties of focus. Even though most parties are not specifically right-winged or left-winged but are somewhere in the middle, a division will be made between parties that are considered as more right-wing and parties that are considered more as left-wing. The parties considered here on the left are the PVDA, D66, Groenlinks and the SP. The parties considered here on the right are the VVD, CDA, PVV, LPF, SGP and the FVD. These are the biggest parties throughout the years or, as in the case of the LPF and FVD, are the biggest upcoming parties that got seats throughout the years.

If one looks at the election result from September 6, 1989, the biggest party was the right-wing party CDA. During this election most seats went to the right-wing parties.[127] In both 1994 and 1998, however, the election results showed a win for the left-wing party PVDA and, furthermore, the left-wing gained most seats throughout these two elections.[128] During the elections of 2002, a great shift occurred and most seats went to right-wing parties, with the LPF

126 J. Jansen van Galen, 'Met het boerkaverbod komen we nergens', Het Parool, 21-07-2018 https://www.parool.nl/opinie/-met-het-boerkaverbod-komen-we-nergens~a4601828/ (accessed on 31-03-2019).

127 Kiesraad, 'Tweede Kamer 6 september 1989: Uitslag & Verdeling tussen partijen', https://www.verkiezingsuitslagen.nl/verkiezingen/detail/TK19890906 (accessed on 05-04-2019).

128 Kiesraad, 'Tweede Kamer 3 mei 1994: Uitslag & Verdeling tussen partijen', https://www.verkiezingsuitslagen.nl/verkiezingen/detail/TK19940503 (accessed on 05-04-2019).; Kiesraad, 'Tweede Kamer 6 mei 1998: Uitslag & Verdeling tussen partijen', https://www.verkiezingsuitslagen.nl/verkiezingen/detail/TK19980506 (accessed on 05-04-2019).

as most visible party who was as a newcomer and immediately obtained 26 seats.[129] The cabinet formed was the 'First Balkenende cabinet', named after the first minister Jan Peter Balkenende, but fell later that year after multiple scandals.[130] From the next elections in 2003 onwards, two things stand out. First of all, the major parties elected were right-wing parties and the right-wing obtained more seats than the left-wing. Secondly, throughout these elections, the number of parties grew where in 1989 only six parties were able to obtain seats while in 2017 thirteen parties were able to obtain seats.

A couple of things are noticeable. First of all, the great number of seats the LPF was able to obtain on May 15, 2002 after its establishment on February 14, 2002 stands out. As discussed, 9/11 marked a critical point in history as the war on terrorism started to evolve and Islamophobia became more prominent within society. This sentiment is seen in the election program of the LPF where they speak of immigration and integration. The party criticizes the purple government of the '90s that caused a dichotomy in society where a huge group of immigrants do not actively participate in society. Furthermore, they claim that the Netherlands is not a country of immigration and that the flux of newcomers that arrives illegal needs to stop.[131] They argue that some groups are social-culturally lacking on the Dutch culture because they do not have a European Jewish-Christian-Humanist background. This is why they are behind and thus are causing for a dangerous dichotomy in society. They particularly speak of Islamic traditions, and this dichotomy, even though not explicitly mentioned, is, then, mainly caused by the Islam.[132] Furthermore, immigration must be resisted as much as possible according to them in order to prevent illegal immigration and to grow as society.[133] So, after the '90s where adaptation was stimulated and political parties tried to balance between the Dutch culture and the culture of minorities – and in this case Muslims – this program of the LPF clearly shows a break with this mentality and wanted to follow the idea of assimilation and integration to Dutch values.

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129 Kiesraad, 'Tweede Kamer 15 mei 2002: Uitslag & Verdeling tussen partijen', https://www.verkiezingsuitslagen.nl/verkiezingen/detail/TK20020515 (accessed on 05-04-2019).

130 A. van Kessel, 'Vier kabinetten-Balkenende in parlementair-historisch perspectief', *Christen Democratische Verkenningen* (2010), 35-43, 37-38.

131 Lijst Pim Fortuyn, 'Zakelijk met een Hart', http://dnpprepo.ub.rug.nl/433/1/lpf02.pdf (accessed on 07-04-2019), 1-9, 1.

132 Lijst Pim Fortuyn, 'Zakelijk met een Hart', http://dnpprepo.ub.rug.nl/433/1/lpf02.pdf (accessed on 07-04-2019), 1-9, 5.

133 Lijst Pim Fortuyn, 'Zakelijk met een Hart', http://dnpprepo.ub.rug.nl/433/1/lpf02.pdf (accesed on 07-04-2019), 1-9, 5.

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However, the First Balkenende cabinet fell and the re-elections in 2003 showed a more moderate outcome with more seats still going to the right-wing parties. The two parties that got most seats between 2003 and 2017 were the CDA and the VVD. In 2003 and 2006, the CDA got elected as biggest party in the Netherlands. Even though they not mention it in their electoral program of 2002, in their program of 2006 they explicitly mention that around the core values of the Dutch society – like secularization, democracy, solidarity, justice, equivalence, and sustainability[134] – there is no space for a multicultural society if it is up to the CDA.[135] Two of the ten priorities in the election program of 2002-2006 are concerned with migration and asylum. Their vision is straightforward and they want two things: They want the asylum procedure to be executed by the UNHCR and they want the Netherlands not to serve as economic immigration country.[136] In addition, the CDA acknowledges both the enrichment as the problems immigrants bring to the Dutch society. They emphasize reciprocity where newcomers must adapt to the society and should speak the Dutch language. In turn, the society must give these newcomers space and the chance to integrate, even though this must be within Dutch norms and values.[137] In their election program of 2006 they acknowledge the fact that terrorism plays its part in immigration but also that terrorism influences the Dutch culture.[138] Furthermore, according to them, the Dutch society is a mosaic of people with different social, cultural, and religious backgrounds. They can only be brought together if they all share common values. They do seem to be more focused on assimilation where the Dutch society should welcome the immigrants but the immigrants should learn the language and know the Dutch legislation, culture and history. Religion is never an exception to this.[139] Finally, in 2012, they

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134 CDA Bureau, ' Verkiezingsprogram 2002-2006: Betrokken samenleving, betrouwbare overheid', https://www.parlement.com/9291000/d/vtk2002_vp_cda.pdf (accessed on 08-04-2019), 1-83, 55.

135 CDA, 'Vertrouwen in Nederland. Vertrouwen in elkaar: Verkiezingsprogramma 2006-2011, http://pubnpp.eldoc.ub.rug.nl/FILES/root/verkiezingsprogramma/TK/cda2006/vp06.pdf (accessed on 08-04-2019), 1-109, 12.

136 CDA Bureau, ' Verkiezingsprogram 2002-2006: Betrokken samenleving, betrouwbare overheid', https://www.parlement.com/9291000/d/vtk2002_vp_cda.pdf (accessed on 08-04-2019), 1-83, 11.

137 CDA Bureau, ' Verkiezingsprogram 2002-2006: Betrokken samenleving, betrouwbare overheid', https://www.parlement.com/9291000/d/vtk2002_vp_cda.pdf (accessed on 08-04-2019), 1-83, 68.

138 CDA, 'Vertrouwen in Nederland. Vertrouwen in elkaar: Verkiezingsprogramma 2006-2011, http://pubnpp.eldoc.ub.rug.nl/FILES/root/verkiezingsprogramma/TK/cda2006/vp06.pdf (accessed on 08-04-2019), 1-109, 9.

139 CDA, 'Vertrouwen in Nederland. Vertrouwen in elkaar: Verkiezingsprogramma 2006-2011, http://pubnpp.eldoc.ub.rug.nl/FILES/root/verkiezingsprogramma/TK/cda2006/vp06.pdf (accessed on 08-04-2019), 1-109, 25, 32-33.

put an article on their site where they argue in favor of a face-veil ban.[140] In sum, they speak more about assimilation than adaptation where the Dutch values are prominent and minorities are recognized within the boundaries of these values.

The same goes for the VVD, the biggest party in the Netherlands from 2010 onwards. With regard to religion, immigration and integration their manifesto more or less stays the same throughout the years. In order to integrate they demand that people learn the language, get a job, accept the core values of the Dutch society and that people integrate on own costs.[141] In 2010 they already implicitly mention critics on religious activities that do not immediately stands in line with the Dutch culture, which also means critics on face-veiling. They claim they do not accept pressure in religious circles were men and women are treated differently in public space, like public transporting and hospitals.[142] In both their manifesto of 2012 and 2017 they openly argue against wearing face-covering garments. In their program of 2012 they claim that they want people to be openly and recognizable and are thus advocates of a prohibition of wearing face-coverings.[143] In 2017 they even explicitly mention being against wearing a burqa. They argue that integration means that one adapts to society and its norms and values. According to them, it is important that everyone can meet openly in the Dutch society and that wearing a burqa or balaclava hinders this. People feel unsafe because they don't know who is underneath this garment. So that is why the VVD argues in favor of this ban.[144]

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140 CDA, 'Waarom is het CDA voor een verbod op gelaatsbedekkende kleding?', https://www.cda.nl/actueel/nieuws/waarom-is-het-cda-voor-een-verbod-op-gelaatsbedekkende-kleding/ (accessed on 08-04-2019).

141 VVD, 'Orde op zaken: Verkiezingsprogramma 2010-2014', https://www.parlement.com/9291000/d/2010_vvd_verkiezingsprogramma.pdf (accessed on 12-04-2019), 1-42, 34.; VVD, 'Niet doorschuiven maar aanpakken: Concept-verkiezingsprogramma VVD 2012-2017 Tweede Kamerverkiezingen 12 september 2012, https://www.parlement.com/9291000/d/vvd2012.pdf (accessed on 12-04-2019), 1-57, 46-47.; VVD, 'Zeker Nederland: VVD verkiezingsprogramma 2017-2021', https://vvd.nl/content/uploads/2016/11/vvd_verkiezingsprogramma_pages.pdf (accessed on 12-04-2019), 1-102, 20-21.

142 VVD, 'Orde op zaken: Verkiezingsprogramma 2010-2014', https://www.parlement.com/9291000/d/2010_vvd_verkiezingsprogramma.pdf (accessed on 12-04-2019), 1-42, 35.

143 VVD, 'Niet doorschuiven maar aanpakken: Concept-verkiezingsprogramma VVD 2012-2017 Tweede Kamerverkiezingen 12 september 2012, https://www.parlement.com/9291000/d/vvd2012.pdf (accessed on 12-04-2019), 1-57, 46.

144 VVD, 'Zeker Nederland: VVD verkiezingsprogramma 2017-2021', https://vvd.nl/content/uploads/2016/11/vvd_verkiezingsprogramma_pages.pdf (accessed on 12-04-2019), 1-102, 20.

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In addition to these two parties, there are two right-wing parties that gained more prominence after the terrorist attacks of the 21st century and that are focusing on preservation of the own culture while discriminating and scapegoating others. The first one is the PVV. They actively seek to de-Islamize the Netherlands as they perceive it as a threat and as an ideology that is the opposite of freedom.[145] In addition to this, they not only want to stop immigration from happening; they also explicitly want to stop immigration of people from Islamic countries.[146] Furthermore, they actively campaign in favor of a burqa ban and do not tolerate this in the Netherlands.[147] The second party is the FVD who also criticizes contemporary immigration. According to them, the coming of groups of (Islamic) immigrants puts pressure on the Dutch core values. They claim that Dutch values always comes first when religious rules clash with the Dutch law and, furthermore, support a ban on the wearing of the burqa and niqab.[148] In addition, this group believes that if non-Dutch groups are not able to assimilate into the Dutch society they should leave the country.[149] They do not speak of adaptation of minority groups but want full assimilation. What stands out is that the politics shattered throughout the years and that there are more right-wing parties that also include opposition to face-veiling in their campaign. This is also clear in the First Chamber elections in 2019 where right-wing parties gained territory, especially the FVD. As will be discussed in the following, populism plays a huge part as it gains support in the Netherlands which brings safety in times of fear.[150]

What is striking in all these right-wing manifesto's, is that none of them really support the idea of having a multicultural society. There seems to be this fixed vision of a society where both immigrants and migrants have to assimilate into and where they are forced to embrace Dutch norms and values, even though this means they need to distance themselves from their

145 PVV, '*Hún* Brussel, óns Nederland: Verkiezingsprogramma 2012-2017',
http://pubnpp.eldoc.ub.rug.nl/FILES/root/verkiezingsprogramma/TK/pvv2012/PVVTK2012.pdf
(accessed on 14-04-2019), 1-56, 26.
146 PVV, '*Hún* Brussel, óns Nederland: Verkiezingsprogramma 2012-2017',
http://pubnpp.eldoc.ub.rug.nl/FILES/root/verkiezingsprogramma/TK/pvv2012/PVVTK2012.pdf
(accessed on 14-04-2019), 1-56, 35.
147 PVV, '*Hún* Brussel, óns Nederland: Verkiezingsprogramma 2012-2017',
http://pubnpp.eldoc.ub.rug.nl/FILES/root/verkiezingsprogramma/TK/pvv2012/PVVTK2012.pdf
(accessed on 14-04-2019), 1-56, 26, 37.
148 Forum Voor Democratie, 'Standpunten: Wet Bescherming Nederlandse Waarden',
https://forumvoordemocratie.nl/standpunten/wet-bnw (accessed on 14-04-2019).
149 Forum Voor Democratie, 'Concept Verkiezingsprogramma 2017-2021',
https://forumvoordemocratie.nl/Verkiezingsprogramma%202017.pdf (accessed on 14-04-2019), 1-27,
18.
150 NOS, 'De nieuwe politieke kaart van Nederland: versnippering in beeld',
https://nos.nl/artikel/2277253-de-nieuwe-politieke-kaart-van-nederland-versnippering-in-beeld.html
(accessed on 14-04-2019).

own culture, norms and values. The government treats everyone equal with regard to Dutch norms, which partly is necessary in order so that minority groups will not feel left out or discriminated against as being treated differently, but forget that some groups also have other norms and values they embrace for whatever kind of reason, like some Muslim women wearing the burqa. In this case, Muslims and their norms and values are not fully recognized anymore by shifting towards a policy of assimilation and, specifically, by implementing this burqa ban. The outcome of this reasoning of implementing the ban on feelings of fear for the Islam and terrorism caused further polarization to happen.

Populist were very well capable to act on this feeling of fear that prevailed within society. One of these fears they respond to regards immigration. Since the second half of the 20th century immigration started to be seen as a problem. Not only is there the fear that immigrants would take the jobs of, in this case, the Dutch citizens. There is also the fear of the unknown culture that is coming to this society. Politicians more often intervene on this feeling of fear and make it part of their program in order to gain support, as is also clearly shown in the election programs of right-wing parties. Measures taken by these politicians, like the implementation of the burqa ban, can be perceived than as a way of political symbolism.

Without going into depth to much, a small contribution must be dedicated to the description and usage of the concept "political symbolism". In Rebecca E. Klatch's article, she makes a division between two types of symbolism: The symbolism of meanings, which normally has a positive connotation, and the symbolism of the masters tradition, which is more often seen as manipulative.[151] The strand that views 'political symbolism in terms of meanings stresses the vital role political symbols play in society either by creating social solidarity for the group or by providing orientation for the individual'[152]. Thus, symbols of solidarity must unify individuals and politics can use symbols in order to unify groups. The view of the individual is constructed by the symbolic ordering of the social and political world and provides a scope through which an individual sees the world and interprets reality.[153] But, [g]iven a plurality of social groups, symbols which unite one group inevitably separate or divide that group from others. Thus, integration or consensus for one group does not imply solidarity for the whole group'[154]. Political symbolism within the masters tradition can take two forms that are both

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151 R.E. Klatch, 'Of Meanings & Masters: Political Symbolism & Symbolic Action, *Polity* 21 (1988) 1, 137-154, 138.
152 Klatch, 'Of Meanings & Masters', 139.
153 Ibidem, 140.
154 Ibidem, 141.

considered as manipulative: The role of symbols as weapon of domination and as screens for psychic release. Symbolism as weapon can mean that groups or classes monopolize the use of symbols that legitimate the distribution of power: 'Symbols, then, do not play a beneficial role in creating social solidarity or providing orientation for the individual; rather, symbols are means of domination, furthering the divisions within society'[155]. Symbols as screens sees 'symbols as expression of the psychological workings in the mind'[156] and '[p]olitical symbols assuage anxiety not only through reassurance but also by providing an outlet in the form of scapegoat'[157].

In order to understand the burqa ban as political symbolism one must move beyond this division and bound these different forms of symbolism together. Symbols are used in order to unify one group, where this burqa ban is an example of. This ban is created in order to unify individuals that all feel uncomfortable by looking at and interfering with women who are wearing this face-veil. But this excludes Muslim women who do wear the face-veil or other (Muslim) citizens that do not on any ground accept a ban like this. But not only this, this ban is also used as furthering division within society between different groups and is exploited by politicians in order to respond to anxieties and scapegoat a part of the Muslim minority community.

As early as 2005, newspaper articles were discussing the idea of this ban as political symbolism. In an article in the Trouw it is argued that it is a shame that parties like the CDA and VVD admitted to the submission of the motion by Wilders and that it needed more deliberation before submitting this motion. The writer of the article claims this ban to be a political symbolism that, due to its direction at a specific group, comes close to risky mood making.[158] Also after her investigation, Moors was able to conclude that the prohibition of the face-veils is especially a form of political symbolism and detracts attention of the actual problems in the domain of education, violence in public transport and domestic violence.[159] In 2002, the anti-Muslim campaign of Fortuyn already brought him a lot of seats and votes. After the assassination of Fortuyn, and the re-elections of 2003, Wilders finally decided to create his own political party that from 2006 on was able to win a lot of votes. His scapegoating of the Islam created harmony between citizens of the Dutch society that were afraid of both terrorism,

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155 Ibidem, 143.
156 Ibidem, 143.
157 Ibidem, 144.
158 Trouw, 'Boerka-verbod komt in de buurt van riskante stemmingmakerij', 22-12-2005.
159 Moors, 'Gezichtssluiers: Draagsters en Debatten', 57.

that is often associated with Islam, and minority groups and immigrants who could possibly take their jobs. This is also done by the FVD and other right-wing groups who were in favor of the ban. It is a way to create support.

To conclude, after 9/11 the multicultural policy shifted towards a more assimilationist policy. As Fleur Sleegers argues in her article for the scientific council for the governmental policy (Wetenschappelijke Raad voor het Regeringsbeleid) is that even though politicians from 9/11 onwards openly rejected the assimilationist thought that tended to prevail in the politics, they acted differently. From left-wing to right-wing parties, a more assimilationist discourse tended to prevail in the politics where the emphasize was more on assimilation instead of adaptation of migrants in the Dutch society.[160] Han Entzinger also agrees on this. He argued that, among other things, international terrorism, Muslims fundamentalism and international immigration contributed to a feeling of fear, threat and insecurity within society, which is why a shift occurred in the Netherlands on the execution of the policy of multiculturalism.[161] In turn, '[t]hese feelings have been projected on the immigrants and their presumed unwillingness to become like 'us' (…) Initially the policy focus was on separateness; later it shifted to institutional integration and only very recently assimilation has become the norm'[162]. This could also be seen in the manifestos researched in this section and the shift that occurred from the '90s until 2017. Sleegers also argues that social-culturally integration seems to become the norm throughout the years where immigrants not only should respect the Dutch norms and values but of whom is expected, when needed, they put aside their own cultural and religious views and adopt the Dutch norms and values.[163] This is also seen in the manifestos where multiple parties – like the CDA, PVV, VVD, etc. – are raising these issue. This burqa ban could be seen as a reaction to this shift from support of the policy of multiculturalism towards a more assimilationist stance. Part of this is because the political landscape is moving more to the right. But also the territory gained by populist is part of the explanation. But most of this could be seen as a reaction to the fear that exist within society with regard to Islamization and terrorism.

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160 F. Sleegers, 'In Debat over Nederland: Veranderingen in het Discours over de Multiculturele Samenleving en Nationale Identiteit', *Wetenschappelijke Raad voor het Regeringsbeleid* (Den Haag 2007) 1-95, 54.
161 H. Entzinger, 'Changing the Rules While the Game is On; From Multiculturalism to Assimilation in the Netherlands', in: Y. M. Bodemann and G. Yurdakul (eds.), *Migration, Citizenship, Ethnos: Incorporation Regimes in Germany, Western Europe and North America* (New York 2006), 121-144, 135.
162 Entzinger, 'Changing the Rules While the Game is On', 135-136.
163 Sleegers, 'In Debat over Nederland', 54.

Chapter 3: Britain

As we have seen that in the Netherlands the burqa was implemented because of a shift in the multicultural policy, Britain has not yet implemented this ban. In this chapter, a look will be given to the question why Britain thus far has not implemented the ban. Also here, important will be to see if there is a link between the multicultural policy executed in Britain and the debate on the burqa ban. Specifically, the sub-question will be: How does opposing a burqa ban fit into the British perception of having a multicultural society? Just like in the case of the Netherlands, the same four aspects will be looked at in order to make a good comparison between both countries. First, a historical overview will be given of both the multicultural policy and the burqa ban debate. After this, research will create more depth into the question when this debate took place, where a specific point of focus will be the time when the terrorist attacks took place. The third section will outline the arguments given throughout this debate and the parties involved. The final section will look whether these arguments should be considered more as multicultural or assimilationist.

3.1: Historical Overview: Britain

Since the beginning of the 19th century, Muslims were present in Britain. This number grew because Muslim seamen and traders from the Middle East started to sail towards Britain and started to settle around major British ports. But also, Muslims from India came over to study or trade in Britain.[164] So Britain already started to be culturally diverse since the 19th century, especially with regard to the Muslim population. However this did not mean the beginning of the multicultural society. This idea started to develop in the 20th century. In Britain, just like in the Netherlands, multiculturalism came as a reaction to the ending war and decolonization that followed. The migration to Britain that started in the post-war years is also referred to as the New Commonwealth immigration that started to change the demographic landscape of this country.[165] However, instead of feeling some sort of responsibility towards the new migrants, Britain had a conservative attitude throughout the '60s and did not directly accept this new migration wave, mostly because they had no clue how to deal with this. A poll on the

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164 T. Abbas, 'After 9/11: British South Asian Muslims, Islamophobia, Multiculturalism, and the State, *American Journal of Islamic Social Sciences* 21 (20014) 3, 26-38, 26-27.

165 C. Julios, *Contemporary British Identity: English Language, Migrants and Public Discourse* (Hampshire 2008) 91.

immigration policy showed that most people wanted restrictions on this influx.[166] From the '60s onwards, Britain faced a rocky road to multiculturalism that lasted at least two decades before it started to settle down a little.[167] In 1962, the Conservative government decided to introduce controls on the New Commonwealth migration. This was a measure taken probably under a lot of pressure from a public mobilized campaign group that are by grassroots anti-immigrants.[168] The measure taken had a rather discriminative tone and immigrants were seen as a danger for the British empire and culture. This picture was both fueled by politicians as the media. After the elections of 1970 and the victory of the Conservative party, a dual approach with regard to immigrants was used: new immigrants wanting to enter Britain was restricted but immigrants already entered Britain should receive equal treatment.[169] Multiple acts were implemented from the 1960s onwards to deal with these immigrants, like the Commonwealth Immigrants Act of 1962, Race Relations Act of 1965, Commonwealth Immigrants Act of 1968, Race Relations Act of 1968, Immigrations Act of 1971, and the Race Relations Act of 1976. As Uberoi and Modood argue, 'Britain (…) abandoned policies of assimilation in the 1960s; formal and informal *policies* of multiculturalism then followed'[170]. The immigrants were considerably disadvantaged at first: 'A combination of socio-economic deprivation, unemployment, lack of English language skills, academic underachievement and widespread racism placed these newcomers at considerable disadvantage in comparison with their white British counterparts'[171]. However, since the 1960s, and even more from the 1970s onwards, 'governments in Britain have shaped policy and practice in relation to ethnic minority groups based on various strategies of anti-immigration and anti-discrimination legislation on the one hand, and with a programme of assimilation, integration and, most recently, multiculturalism on the other'[172]. An important concept introduced from the 70s onwards was "Britishness", the idea of binding British people together based on culture and identity, and making this more inclusive. As Uberoi and Modood argue, '[m]ulticulturalists first talked about this goal [of Brithisness] in 1974; and the 1985 Swann Report into the education of ethnic minority children also emphasised this goal, as did

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166   Julios, *Contemporary British Identity*, 91.
167 Ibidem, 91.
168 Ibidem, 92.
169 Ibidem, 93.
170 V. Uberoi and T. Modood, 'Has Multiculturalism in Britain Retreated?: If Properly Understood, Multiculturalism Continues to Flourish in Britain', *Soundings* 53 (2013) 129-142, 130.
171 Julios, *Contemporary British Identity*, 101.
172 T. Abbas, 'Muslim Minorities in Britain: Integration, Multiculturalism and Radicalism in the Post-7/7 Period', *Journal of Intercultural Studies* 28 (2007) 3, 287-300, 289.

other leading multiculturalists after the Rushdie Affair. Doing so has *seemingly* influenced liberal nationalists like David Miller, who by the 1990s came to advocate making Britishness more inclusive'[173]. Finally, a new flux of immigrants to Britain in the '90s from Africa, Eastern Europe and the Middle East were to be taken in and had to be included in this idea of inclusive Britshness.[174]

However, this idea of more inclusive Britishness declined from the start of the 21st century onwards and multiculturalism seemed to be on its detour. This is not only due to the social division that was already present in the '60s and that still is prominent in British society today.[175] Even though Islamophobia has always prevailed in Britain, '[s]ince 9/11, the situation has both deteriorated and intensified. Islamophobia has gained such a discursive prevalence that western European society is becoming even more uncritically receptive to an array of negative images and perceptions about Islam and Muslims'[176]. Important in fueling this idea of Islamophobia is the media.

As described, the British policy on multiculturalism did know some bumps on the road. Not only 9/11, also the terrorist attacks in the metro station in London on July 7, 2005, the assassination of the twenty-five year old military Lee Rigby on May 22, 2013 as revenge on military presence in Afghanistan, and a terrorist attack during the concert of pop artist Ariana Grande on May 22, 2017 in Manchester proved to be a backlash for the British multicultural policy. In 2011, the then Prime minister Tony Blair held a speech at the Munich Security Conference where he openly criticizes the multicultural policy Britain thus far executed. An important argument made by him is that young Muslims in Britain cannot identify with their parents' Muslim identity but also cannot identify to the British identity because Britain has allowed their collective identity to be weakened. He said that '[u]nder the doctrine of state multiculturalism, we have encouraged different cultures to live separate lives, apart from each other and apart from the mainstream. We've failed to provide a vision of society to which they feel they want to belong. We've even tolerated these segregated communities behaving in ways that run completely counter to our values'[177]. He also noted that when a white person holds

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173 Uberoi and Modood, 'Has Multiculturalism in Britain Retreated', 135.
174 Abbas, 'Muslim Minorities in Britain', 288.
175 Abbas, 'After 9/11', 27.
176 Ibidem, 29.
177 D. Cameron, 'Speech: PM's Speech at Munich Security Conference: Prime Minister David Cameron had Delivered a Speech Setting Out his View on Radicalisation and Islamic Extremism', 05-02-2011, https://www.gov.uk/government/speeches/pms-speech-at-munich-security-conference (accessed on 28-05-2019).

racist views he is corrected. But when non-white people hold equally racist or unacceptable views, we feel too anxious to stand up to this person. This division causes a feeling of non-equality, non-recognition and non-belonging, where, in this case, Muslims can feel rootless.[178] This statement made by Blair could be seen in light of what Charles Taylor also argued. The fact that this group of Muslims is not recognized and not included in society has led to radicalization of some of them in order to obtain this feeling they belong somewhere. However, unlike Kymlicka argued, according to Blair, the fact that this group received minority rights that kept them distanced from society is the reason they feel like they do not belong to this society.

Even though the multicultural policy in Britain knew rough times, they never fully distanced themselves from this. As will be touched upon in the final section, still in 2017 political parties acknowledge the fact that Britain still has one of the most successful multicultural societies. This could also be seen in the debate on the burqa ban where the topic of the policy of multiculturalism is extensively touched upon by politicians. As early as 2006 debates started to exist surrounding the wearing of (face-)veils in Great-Britain. The debate surrounding the veil was initiated by Jack Straw, the then Member of the Parliament of the constituency of Blackburn, when he wrote a column to the Lanchashire Evening Telegraph on October 4, 2006.[179] Straw was having a conversation with a women a year before who was fully veiled and this conversation kept him thinking. The main problem was that he felt uncomfortable to talk to someone in person of who he could not even see.[180] Straw thinks this conversation has more value when the lady would remove the covering from her face. Furthermore, he concerns 'that wearing the full face veil was bound to make better, positive relations between the two communities more difficult'[181] and claims that the wearing of the veil 'was such a visible statement of separation and of difference'[182] that he sees it as an issue. This

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178 D. Cameron, 'Speech: PM's Speech at Munich Security Conference: Prime Minister David Cameron had Delivered a Speech Setting Out his View on Radicalisation and Islamic Extremism', 05-02-2011, https://www.gov.uk/government/speeches/pms-speech-at-munich-security-conference (accessed on 28-05-2019).

179 D. McGhee, *End of Multiculturalism?: Terrorism, Integration and Human Rights* (Berkshire 2008), 96.

180 The column Jack Straw wrote was not findable on the Lanchaster Telegraph. However, The Guardian published the whole column on 6 October 2006: J. Straw, 'I felt uneasy talking to someone I couldn't see', *The Guardian* 06-10-2006, https://www.theguardian.com/commentisfree/2006/oct/06/politics.uk (accessed on 16-04-2019).

181 J. Straw, 'I felt uneasy talking to someone I couldn't see', *The Guardian* 06-10-2006, https://www.theguardian.com/commentisfree/2006/oct/06/politics.uk (accessed on 16-04-2019).

182 J. Straw, 'I felt uneasy talking to someone I couldn't see', *The Guardian* 06-10-2006,

column proved to be the beginning of the face-veil debate in Britain. However, he never submitted a motion within parliament like Wilders did in the Netherlands. His goal was to open up debate on this topic in order to make the wearing of the burqa, that he perceives as problematic, negotiable.

In the years that followed, as will be outlined throughout this chapter, this debate would remain until today where a lot of parties got involved and a lot of controversy with regard to this topic prevails. Right-wing parties – like the BNP, UKIP and EDL – made the policy of a general or partial ban on the burqa an official part of their manifestos from 2010 onwards and, thus, made it an official part of their campaign from this point onwards. Also, in 2010, Philip Hollobone submitted a bill to regulate the wearing of certain face coverings on certain occasions in public[183]. This bill was debated within parliament in 2012 and Hollobone has since then made it a topic of debate within parliament. At the same time, the debate opened up by Straw also opened up debate on the wearing of the burqa in schools and courts. What stands out is that from the opening of the debate until the day of today this debate has been met with a lot of aversion and no unification in order to come to a solution has been reached. Why is this? But just as interesting is the question why Straw came with this comment at this particular moment. What led him to do this? In order to understand why this is the case, a look should be given at the context of this debate.

3.2: Context Burqa Ban

In Britain, an analysis with regard to media reporting on the Muslim community is made by Paul Baker, Costas Gabrielatos and Tony McEnery in their book *'Discourse Analysis and Media Attitudes: The Representation of Islam in the British Press'*. This will be used in order to outline the context of the development of the debate on the burqa ban. Just like the doctoral thesis of Vliegenthart, they analyze certain topics with regard to the Islam that prevails in the media. Only, they do this with regard to Britain. Also, they used two different words of focus, namely the veil and radicalization, which are more specific than the frames used in Vliegenthart's

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https://www.theguardian.com/commentisfree/2006/oct/06/politics.uk (accessed on 16-04-2019).

183 P. Hollobone, 'Face Coverings (Regulation) Bill: A Bill to Regulate the Wearing of Certain Face Coverings; and for Connected Purpose', 30-06-2010, https://publications.parliament.uk/pa/cm201011/cmbills/020/2011020.pdf (accessed on 09-06-2019), 1-4.

research, and they only look at media reports instead of both media reports and political reports. However, this research could most definitely give an indication on media reporting and the turning point of the burqa ban debate in order to build on for the remainder of this chapter. One of the graphs in this book shows that Muslim women is more often referred to in the media than Muslim men, with a peak in 2006. This peak can most definitely be ascribed to Straw's comment on the wearing of the face-veil.[184] What was also interesting is that even though rates of the prevalence of Muslim men in media reports was higher in 2002 compared to Muslim women in the same year, its real peak was also in 2006, which has to do with the 7/7 bombing in 2005 and the fear of radicalization.[185] On July 7, 2005, a relatively large scale terrorist attack happened on British soil. During this terrorist attack, three explosions in the metro station of London and one explosion on a bus in London city happened that caused 52 people to lose their lives and approximately 700 people got injured. Also the four suicide bombers died during this event. Two weeks later, on July 21, 2005, another attempt was made by terrorists to attack public transporting. However, these failed and no people got killed or injured. One of the suspects, though, fled London in a burqa.[186]

For the purpose of this paper, the most important observation made by Baker, Gabrielatos and McEnery is the following:

> 'Notably, 2006 is when stories about Muslim women also peak, although they do not tend to be written about as potential terrorists. As noted, the key story here is about Muslim women veiling in public, and was triggered by Jack Straw's article. Straw's article does not refer to the 7/7 attacks of 2005, but it could be argued that the attacks, or the national mood towards Islam in the following months, could have contributed towards Straw's mindset, as well as towards the way that the media heavily debates his article. Veiling in itself could therefore be viewed as a more 'passive' form of radicalisation for Muslim women, whereas Muslim men are viewed as more 'active' threats – that is, as potential terrorists'[187].

This observation is key with regard to the historical context of the development of the burqa ban debate in Britain. Here, a direct relation is seen between the events that occurred in Britain

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184 P. Baker, C. Gabrielatos and T. McEnery, *Discourse Analysis and Media Attitudes: The Representation of Islam in the British Press* (New York 2013) 198-199.
185 Baker, Gabrielatos and McEnery, *Discourse Analysis and Media Attitudes*, 201.
186 BBC News, 'Jury Sees 21 July 'Burka Escape', 20-02-2007, http://news.bbc.co.uk/2/hi/uk_news/6378863.stm (accessed 22-04-2019).
187 Baker, Gabrielatos and McEnery, *Discourse Analysis and Media Attitudes*, 201.

with regard to terrorism and Straw's comment that was to ignite the debate. In their research, they noted that the reference to veiling is highest in 2006. The same goes for the reference to radicalization, which was highest after 2005.[188] Also, a direct link was made between radicalization and multiculturalism. Based on three examples of newspapers articles, this link was possible. These newspaper articles claim that multicultural policies encouraged Muslims to think they need special recognition that, in turn, leads to Islamic radicalization that effects the whole society, and that the failed strategy of multiculturalism of the government was partly to blame why the roots of radicalization were not tackled sooner.[189] In other words, because of a failed strategy of multiculturalism and because Muslims felt they needed special rights, radicalization was possible. Also here, terrorist attacks, specifically the one of 7/7, could be marked as starting point of the debate.

3.3: The British Debate

Questions surrounding Muslim loyalty already existed in 1989 after the Rushdie affair. However, they were ignited again after 9/11. New laws in 2001 and 2005 transformed Muslim communities in suspect communities. This suspicion is not only directed at potential Muslim radicals; this suspicion is directed against all members of the Muslim community in Britain.[190] This reaction could best be positioned against the background of 'the persistent influence of powerlessness, exclusion, trauma and humiliation'[191]. They feel like they have no idea how to handle the Muslim minority community and after 9/11 and especially 7/7 they should take control. Reactions of some politicians to ban the burqa should be seen in this light, as most argue that the wearing of the burqa and niqab constraints integration. After Straw's comment in 2006 on the face-veil and how it separates Muslims from British society, multiple politicians and other prominent people agreed. For instance, two weeks after Straw made his comment, then prime minister Tony Blair made a statement about the burqa. In the BBC News, it is stated that 'Tony Blair has said the wearing of full face veils by Muslim women is a "mark of separation" and made some "outside the community feel uncomfortable"'[192] and 'that a debate

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188 Ibidem, 203.
189 Ibidem, 228.
190 McGhee, *End of Multiculturalism*, 29-30.
191 Ibidem, 49.
192 BBC News, 'Blair's Concern over Face Veils', 17-10-2006
 http://news.bbc.co.uk/2/hi/uk_news/politics/6058672.stm (accessed on 24-04-2019).

was needed on how the Muslim community integrates with British society'[193]. Furthermore 'Mr Blair said there was a need for a wider debate about community integration while allowing people to develop their "distinctive identity"'[194]. Another example is from Gordon Brown, who was Chancellor of the Exchequer and member of the Labour Party. He was the first politician to back Jack Straw and said 'it would be better for Britain if fewer Muslim women wore veils'[195] and describes the veil 'as a symbol of separation'[196].

Even though some would argue that the ban must be implemented due to security reasons and terrorism, like Senior Church of England bishop Michael Nazir-Ali who made a direct link between the failed attempt for a terrorist attack on 21 June 2005 and the suspect to flee in a burqa and who also acknowledged the danger to national security if allowing the face veil[197], and even though it does play a part in the debate, most arguments are made based on the integration of Muslims. The integration of the minority Muslim community has been a problem for many years and Britain has no clue how to deal with it.

As will be discussed in the next section, no consensus existed with regard to the burqa ban within the two biggest parties in England, namely the Conservative and Unions party, also known as the Conservatives, and the Labour Party, also known as the Labours. Both parties did not advocate in favor of a burqa ban and it never became an official policy in their manifestos throughout the years. Even though the manifestos do not mention aspirations to ban face-veiling, multiple politicians within these two parties do have opinions in favor of a ban. Here, a couple of prominent examples will be given that were leading throughout the debate, even though many more examples could be given. As it started with Jack Straw, a lot of politicians got involved, like the already mentioned Gordon Brown and Tony Blair. But also Nigel Griffith, politician of the Labours and Member of the Parliament until 2010, criticized women wearing

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193 BBC News, 'Blair's Concern over Face Veils', 17-10-2006
       http://news.bbc.co.uk/2/hi/uk_news/politics/6058672.stm (accessed on 24-04-2019).
194 BBC News, 'Blair's Concern over Face Veils', 17-10-2006
       http://news.bbc.co.uk/2/hi/uk_news/politics/6058672.stm (accessed on 24-04-2019).
195 G. Wilson, 'Brown Breaks Ranks to Back Straw over Lifting Muslim Veils', The
       Telegraph, 11-10-2006, https://www.telegraph.co.uk/news/uknews/1531106/Brown-breaks-ranks-to-
       back-Straw-over-lifting-Muslim-veils.html (accessed on 24-04-2019).
196 G. Wilson, 'Brown Breaks Ranks to Back Straw over Lifting Muslim Veils', The
       Telegraph, 11-10-2006, https://www.telegraph.co.uk/news/uknews/1531106/Brown-breaks-ranks-to-
       back-Straw-over-lifting-Muslim-veils.html (accessed on 24-04-2019).
197 N. Baker and S. Petkar, 'Lifting the Veil: What is the Burka Ban, What's the Law in the
       UK, is the Burqa a Religious Requirement and What did Boris Johnson Say?', The Sun,
       13-10-2018, https://www.thesun.co.uk/news/2347847/burka-ban-law-uk-religious-boris-johnson/
       (accessed on 24-04-2019).

the veil. As he notes, '"We are the most ethnically integrated society in the world, we have welcomed immigrants and benefited from them. But we have to address the issue of what everyone feels comfortable with and what individuals feel comfortable with"'[198]. Griffith claims that veil-wearing women are selfish as they do not take into account other people who are uncomfortable seeing them or talking to them.[199] Bill Deedes, former politician of the Conservatives, wrote a column for the Telegraph where he notes that 'Ministers appear whimsically to be shifting from the multi-cultural society towards an integrated one. They are whistling in the dark if they think that will play well with the followers of the Islam in our midst'[200]. He says that Muslims are following a particular lifestyle, that of the Sharia law, that is incompatible with that of Britain. According to him, unless we get a better understanding of this and their religion, 'we shall find peaceful co-existence with the moderate majority (which is crucial) even harder to attain'[201]. As final example, in 2016, the then Conservative Prime Minister David Cameron backed public authorities 'that put in place "proper and sensible" rules to ban women from wearing face veils in comments which will reignite debates'[202]. Even though he does not agree on a total face-veil ban, he does agree on a ban in public buildings, like schools and government buildings, in order to stop gender segregation and to prevent radicalization.[203] As these examples show, even though there is no general ambition for these two parties to ban face-veiling, individual members of these parties do advocate in favor of a burqa and niqab ban.

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198 S. Walters and J. Oliver, 'It's Selfish to Wear the Veil, Says Straw Aide', *Mail Online* 07-10-2006, https://www.dailymail.co.uk/news/article-409183/Its-selfish-wear-veil-says-Straw-aide.html (accessed on 29-04-2019).

199 S. Walters and J. Oliver, 'It's Selfish to Wear the Veil, Says Straw Aide', *Mail Online* 07-10-2006, https://www.dailymail.co.uk/news/article-409183/Its-selfish-wear-veil-says-Straw-aide.html (accessed on 29-04-2019).

200 W.F. Deedes, 'Muslims Can Never Conform to Our Ways', *The Telegraph*, 20-10-2006, https://www.telegraph.co.uk/comment/personal-view/3633349/Muslims-can-never-conform-to-our-ways.html (accessed on 29-04-2019).

201 W.F. Deedes, 'Muslims Can Never Conform to Our Ways', *The Telegraph*, 20-10-2006, https://www.telegraph.co.uk/comment/personal-view/3633349/Muslims-can-never-conform-to-our-ways.html (accessed on 29-04-2019).

202 P. Dominiczak and S. Swinford, 'David Cameron Backs Bans on Muslim Face Veils as Tories Plan Crackdown on Gender Segregation', *The Telegraph*, 18-01-2016, https://www.telegraph.co.uk/news/religion/12106833/David-Cameron-I-will-back-schools-and-courts-which-ban-face-veils.html (accessed on 29-04-2019).

203 P. Dominiczak and S. Swinford, 'David Cameron Backs Bans on Muslim Face Veils as Tories Plan Crackdown on Gender Segregation', *The Telegraph*, 18-01-2016, https://www.telegraph.co.uk/news/religion/12106833/David-Cameron-I-will-back-schools-and-courts-which-ban-face-veils.html (accessed on 29-04-2019).

However, there are other, smaller parties in Britain that do seem to have an opinion with regard to the burqa ban. As also will be discussed in the next section, three of these parties 'have endeavoured to make political capital out of the burqa to win votes'[204]. These three parties are the UK Independence Party (UKIP), British National Party (BNP) and the English Defence League (EDL). Before explaining, a note should be made with regard to these parties. Even though these parties do advocate for a policy of banning the burqa, not every member within these parties equally agree with it. This will be explained further on. However, even though the BNP advocated for a veil ban in British schools, 'UKIP is the first British party to call for a total ban'[205]. Nigel Farage, Chief of the UKIP, says the burqa 'is a symbol of an increasingly divided Britain'[206] where the Sharia law becomes part of the British culture and of which he thinks that nobody wants to be forced to accept this culture as part of the British culture.[207] Already in 2010, the UKIP immediately took up their vision on a burqa policy in their manifesto. There they claim that they believe in civic nationalism where everyone who wishes to identify to Britain is welcome and part of the culture. Furthermore, 'UKIP opposes multiculturalism and political correctness, and promotes uniculturalism – aiming to create a single British culture embracing all races and religions'[208]. Even though a lot of their ideas related to this, most importantly, they claim that they want to '[t]ackle extremist Islam by banning the burqa or veiled niqab in public buildings and certain private buildings'[209]. Even though the UKIP dropped the policy afterward and did not take it into account in their manifesto of 2015[210], in 2017 it again became part of their manifesto. In this manifesto they note that 'UKIP will ban wearing of the niqab and the burqa in public spaces. Face coverings such as these are barriers to integration. We will not accept these de-humanising symbols of segregation and oppression, nor the security

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204 M. Hill QC, 'Legal and Social Issues Concerning the wearing of the Burqa and Other Head Coverings in the United Kingdom', in: A. Ferrari and S. Pastorelli (red.), *The Burqa Affair Across Europe: Between Public and Private Space* (New York, 2015), 77-100 89,.

205 BBC News, 'UKIP Chief Nigel Farage Calls For Burka Ban', 17-01-2010, http://news.bbc.co.uk/2/hi/8464124.stm (accessed on 26-04-2019).

206 BBC News, 'UKIP Chief Nigel Farage Calls For Burka Ban', 17-01-2010, http://news.bbc.co.uk/2/hi/8464124.stm (accessed on 26-04-2019).

207 BBC News, 'UKIP Chief Nigel Farage Calls For Burka Ban', 17-01-2010, http://news.bbc.co.uk/2/hi/8464124.stm (accessed on 26-04-2019).

208 UKIP, 'UKIP Manifesto', April 2010, https://general-election-2010.co.uk/2010-general-election-manifestos/UKIP-Party-Manifesto-2010.pdf (accessed on 26-04-2019), 1-16, 13.

209 UKIP, 'UKIP Manifesto', April 2010, https://general-election-2010.co.uk/2010-general-election-manifestos/UKIP-Party-Manifesto-2010.pdf (accessed on 26-04-2019), 1-16, 14.

210 BBC News, 'UKIP: Full Face Veils are 'Barriers to Integration', 24-04-2017, https://www.bbc.com/news/uk-politics-39693154 (accessed on 26-04-2019).

risks they pose'[211]. Paul Nuttall, leader of the UKIP in 2017, claims that he does not 'believe you can integrate fully and enjoy the fruits of British society if you can't see people's faces'[212] which is why he is in favor of the ban. Also, the BNP tends to be Islamophobic. When they talk about the Islam and immigration in their manifesto of 2016, this seems quite negative with regard to the immigrants and Islam. They want immigration to stop as much as possible, and most definitely those coming to London. In addition, with regard to the Islamization, they want the following: 'Defend our traditional Christian faith, ban Sharia law, ensure that existing community buildings such as pubs and churches are not turned into mosques, [and] ban the burqa'[213]. Furthermore, they also made a list with six reasons why Britain should ban the burqa.[214]

Even though multiple politicians within the Conservative Party and Labour Party argue in favor of a burqa ban, and even though the UKIP, BNP and EDL actively advocate in favor of a ban in their manifestos, a lot of politicians within all of these parties also disagree with this stance. Again, even though multiple examples could be given, the focus here will be on the prominent supporters against a ban and who are directly responding to claims made before by advocates in favor of a ban. One of the people to respond to Jack Straw's statements was Ken Livingstone, member of the Labour Party and former major of London. Livingstone argued that Muslims were being demonized and that the attacks made by Straw and others was 'an assault on freedom of religious and cultural expression'[215] that only leads to Islamophobia. Furthermore, as reaction on Straw, Livingstone said that '[o]ver recent weeks we have seen a demonisation of Muslims only comparable to demonisation of Jews from the end of the 19th century. As at the time, the attack on Muslims in reality threatens freedom for all of us, which took hundreds of years to win – freedom of conscience and freedom of cultural expression. Every person who values their right to follow the religion of their choice or none should stand

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211 UKIP, 'Britain Together: UKIP 2017 Manifesto', 2017, https://d3n8a8pro7vhmx.cloudfront.net/ukipdev/pages/3944/attachments/original/1495695469/UKIP_Manifesto_June2017opt.pdf?1495695469 (accessed on 26-04-2019), 1-64, 37.

212 BBC News, 'General Elections 2017: UKIP Manifesto to Pledge a Burka Ban', 23-04-2017, https://www.bbc.com/news/uk-39682939 (accessed on 26-04-2019).

213 BNP, 'Stop Immigration Now: Greater London Authority, British National Party Election Manifesto 2016', 2016, https://bnp.org.uk/wp-content/uploads/2016/09/bnp_london_manifesto_2016.pdf (accessed on 26-04-2019), 1-3, 3.

214 D. Furness, 'Six Reasons For a Burqa Ban in Britain', BNP, 04-07-2017, https://bnp.org.uk/burqa-ban/ (accessed on 28-05-2019).

215 H. Muir, 'Livingstone Decries Vilification of Islam', *The Guardian* 20-11-2006, https://www.theguardian.com/uk/2006/nov/20/london.religion (accessed on 29-04-2019).

with the Muslim communities today'[216]. Phil Woolas, former Member of the Parliament of the Labours, did not agree with Straw and Griffith because he thinks that "'[p]eople have a right to wear a veil if they are doing so freely'"[217] and '[h]e said Britain risked being painted abroad as 'Islamophobic'"[218]. In 2010, member of the Conservatives and then Minister of State for Immigration, Damian Green also responded to the claims made by advocates in favor of the ban. He said that banning wearing the face-veil 'would be "rather un-British" and run contrary to the convention of a "tolerant and mutually respectful society"'[219]. Here, Green makes claims with regard to the sense of Brithisness as important to not exclude Muslims from society. In 2017, Arron Banks, member of the UKIP, disagrees with his party and in particular with Paul Nuttall on implementing this ban. Banks argues that "'I'm not personally in favour of that [the ban]. I think people have a right to their religious beliefs. I think that there are certain circumstances where if it's a security issue – maybe the airports, or public transport – it's acceptable, but I'm not in favour of curtailing people's [freedoms]'"[220]. As reaction to Paul Nuttall, Theresa May, leader and Prime minister of the Conservatives, also joined the debate. She argues that Muslim women should be able to wear the veil without fear and believes that "'what a woman wears is a woman's choice'"[221]. In 2018, Boris Johnson, Member of the Parliament of the Conservatives, opposed to a ban. Even though Boris Johnson was heavily criticized by the tone of his column, he argued against a ban which he does not consider as the answer to the problem: 'I am against a total ban because it is inevitably construed – rightly or wrongly – as being intended to make some point about Islam. If you go for a total ban, you play into the hands of those who want to politicise and dramatise the so-called clash of civilisations; and you fan the flames of grievance. You risk turning people into martyrs, and you risk a general

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216 H. Muir, 'Livingstone Decries Vilification of Islam', *The Guardian* 20-11-2006, https://www.theguardian.com/uk/2006/nov/20/london.religion (accessed on 29-04-2019).

217 S. Walters and J. Oliver, 'It's Selfish to Wear the Veil, Says Straw Aide', *Mail Online* 07-10-2006, https://www.dailymail.co.uk/news/article-409183/Its-selfish-wear-veil-says-Straw-aide.html (accessed on 29-04-2019).

218 S. Walters and J. Oliver, 'It's Selfish to Wear the Veil, Says Straw Aide', *Mail Online* 07-10-2006, https://www.dailymail.co.uk/news/article-409183/Its-selfish-wear-veil-says-Straw-aide.html (accessed on 29-04-2019).

219 P. Hennessy, 'Burka Ban Ruled Out By Immigration Minister', *The Telegraph* 17-07-2010, https://www.telegraph.co.uk/news/politics/7896751/Burka-ban-ruled-out-by-immigration-minister.html (accessed on 29-04-2019).

220 BBC News, 'General Elections 2017: UKIP Manifesto to Pledge a Burka Ban', 23-04-2017, https://www.bbc.com/news/uk-39682939 (accessed on 29-04-2019).

221 J. Stone, 'Theresa May Backs Muslim Women's Right to Wear a Hijab', *Independent* 01-02-2017, https://www.independent.co.uk/news/uk/politics/theresa-may-muslim-hijab-ban-pmqs-a7557126.html (accessed on 29-04-2019).

crackdown on any public symbols of religious affiliation, and you may simply make the problem worse'[222].

As this all shows, there is a lot of division between parties and within parties on this topic. The two biggest parties do not advocate for a ban in their manifestos but only individual members take a stance with regard to this topic. Even between the three parties that do take up this topic in their manifesto – and who do argue in favor of a ban – cohesion does not exist. In Britain, then, more division in the political arena than in the Netherlands causes no unified solution to this topic.

3.4: Multicultural versus Assimilation

If one looks at the arguments made by both the politicians in favor of a ban as politicians against the ban, a couple things stand out. Starting with the manifestos of the right-wing parties, a shift can be detected between the earlier years, in the beginning of the 21st century, and more recent manifestos. Where in the beginning, mostly in 2007, these parties are very anti-multicultural where banning the burqa is perceived as a good measure against multiculturalism and immigration, this attitude shifted throughout the years. Recently they argue that the wearing of the burqa does not support and improves integration which is thus disadvantageous for society. So, a shift occurred from a more anti-multicultural stance towards a more moderate stance that acknowledges that integration is obstructed by the wearing of this garment. Another thing that stands out is that the arguments made by advocates of the ban of the two biggest parties are all based on the reasoning that the wearing of the burqa hinders integration of immigrants and Muslims within society. This could be seen as more multicultural arguments which is most clearly seen in the reasoning of Jack Straw who claimed that wearing the burqa was a statement of separation and difference and should, thus, not be allowed to wear. If one looks at the arguments made by these politicians against the ban, most come down to the following: the burqa should not be banned because it limits the freedom of these women, that a ban like this goes against the tolerant climate that characterizes the British society, that a potential ban would detract society, that it also stimulates Islamophobia to grow within society and that it enhances polarization within society which could lead to extremism amongst Muslims that feel that they

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222 B. Johnson, 'Denmark Has Got it Wrong. Yes, the Burka is Oppressive and Ridiculous –
    But That's Still no Reason to Ban it', *The Telegraph* 05-08-2018,
    https://www.telegraph.co.uk/news/2018/08/05/denmark-has-got-wrong-yes-burka-oppressive-ridiculous-still/ (accessed on 29-04-2019).

do not belong within this society. These argument are also seen within the manifestos of these parties. In what follows, a look will be given at the manifestos of the two biggest parties in Britain to see what stance is taken towards multiculturalism and integration. Furthermore, a look will be given to populism. Where in the Netherlands populism was able to gain territory because of the detraction of multiculturalism and anxiety within society towards Muslims and extremism, the question raises whether this is different in Britain.

Even though Britain has multiple parties represented in the government, there are two parties that have most seats and are the biggest parties: The Conservative Party and the Labour Party. The Conservatives are a center-right group while the Labours are a center-left group. In 1987 and 1992, the Conservatives became the biggest party in the parliament after the national elections. This changed in 1997 when the Labours became the biggest party and obtained most seats in parliament. They also became the biggest party in 2001 and 2005, where the elections were just a couple months before the terrorist attack, and were eventually replaced by the Conservatives from 2010 onwards.[223] If one looks at the manifestos of these two parties from 2005 onwards, nothing is said with regard to their ambitions to ban the face-veil. There seems to be very little support within the two biggest parties in Britain to take up a policy to ban face-veiling. They do touch upon issues like Islamophobia, multiculturalism and immigration, even though the first two issues is only discussed to a minor degree. For instance, in their manifesto of 2017, the Labours do advocate against practices of Islamophobia. As they note, '[t]he Labour Party is the party of equality and seeks to build a society and world free from all forms of racism, anti-Semitism and Islamophobia'[224]. The Conservatives acknowledge in their Manifesto of 2017 that by then Britain is still 'one of the world's most successful multi-racial, multi-cultural, multi-religious societies. We are proud of our diversity, and the cultural and economic enrichment it brings'[225]. As described, the first immigration-wave already started in the '60s that was already considered as problematic. This did not change throughout the years. Both parties' manifesto focused on immigration, especially after the new refugee influx of the '90s, and after

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223 L. Audickas and R. Cracknell, 'UK Elections Statistics: 1918-2018: 100 Years of Elections', *House of Commons Library*, 13-12-2018, 1-94, 13.

224 The Labour Party, 'For the Many Not the Few: The Labour Party Manifesto 2017', (London 2017), https://labour.org.uk/wp-content/uploads/2017/10/labour-manifesto-2017.pdf (accessed on 26-04-2019), 1-126, 108.

225 The Conservatives and Unionist Party, 'Forward, Together: Our Plan for a Stronger Britain and a Prosperous Future: The Conservative and Unionist Party Manifesto 2017', (London 2017), https://s3.eu-west-2.amazonaws.com/conservative-party-manifestos/Forward+Together+-+Our+Plan+for+a+Stronger+Britain+and+a+More+Prosperous....pdf (accessed on 26-04-2019), 1-86, 55.

the terrorist attacks of 9/11 and 7/7. The Conservatives 'believe that immigration should be controlled and reduced, because when immigration is too fast and too high, it is difficult to build a cohesive society'[226] and the Labours acknowledge that '[f]reedom of movement will end when we leave the European Union. Britain's immigration system will change, but Labour will not scapegoat migrants nor blame them for economic failures'[227]. Both parties agree to limited allowance of immigrants in order to make them fit within the British society. These are topics surrounding the burqa ban but not directly concerning the burqa ban.

However, with regard to the burqa ban, Josephine Heutlin wrote that 'Britain has not yet [in 2018] succumbed to the idea that anti-Islamic far-right attitudes should become mainstream'[228]. As discussed in the previous section, there were right-wing parties that did advocate in favor of a ban. However, they never gained enough support for their campaign and even within these parties, division exists whether this ban should be implemented. Also, as will become apparent, even though populist do exist to a certain degree in Britain, they cannot create enough support in order to gain political territory.

After the attack on 7/7, debates started to inflame and when Straw made his comments on the veil, polls were showing what the society thought about the wearing of the veil. Ipsos MORI, a company that does market research by doing surveys, launched a poll in 2006 that researched if there was support for Straw's comment on the face-veil. They interviewed 1023 British adults. Of them, 59 percent thinks that Straw was right to raise the issue of Muslim women wearing the face-veil while 31 percent disagreed. However, 77 percent agreed that Muslim women should have the right to wear the veil, almost nobody feels frightened or intimidated by women wearing the veil and 51 percent agrees that Straw's comment will damage race relations between communities.[229] What is striking, though, is that 61 percent thinks that women who wear the veil are segregating themselves and 58 percent agree that veils are a

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226 The Conservatives and Unionist Party, 'Forward, Together: Our Plan for a Stronger Britain and a Prosperous Future: The Conservative and Unionist Party Manifesto 2017', (London 2017), https://s3.eu-west-2.amazonaws.com/conservative-party-manifestos/Forward+Together+-+Our+Plan+for+a+Stronger+Britain+and+a+More+Prosperous....pdf (accessed on 26-04-2019), 1-86, 54.

227 The Labour Party, 'For the Many Not the Few: The Labour Party Manifesto 2017', (London 2017), https://labour.org.uk/wp-content/uploads/2017/10/labour-manifesto-2017.pdf (accessed on 26-04-2019), 1-126, 28.

228 J. Huetlin, 'The Politics of Pointless Burqa Bans: European Centrists are Increasingly Adopting Elements of Far-Right Platforms', *The New Republic* (24-08-2018), https://newrepublic.com/article/150846/politics-pointless-burqa-bans (accessed on 26-04-2019).

229 Ipsos MORI, 'Muslim Women Wearing Veils', 17-10-2006, https://www.ipsos.com/ipsos-mori/en-uk/muslim-women-wearing-veils (accessed on 03-05-2019).

visible statement of separation and difference.[230] Thus, there seems to be this tension between this mark of segregation and separation on the one hand, and the opinion that these women have the right to wear the veil on the other. Yougov is another market research company that also set out surveys in order to find out the attitude in society with regard to the face-veil and whether to ban it. They started research on this topic in 2010. In 2010, 67 percent agreed on the statement 'The Burkha should be banned in Britain', while 27 percent disagreed and 6 percent did not know, while in 2011, 66 percent agreed and 27 percent disagreed.[231] In 2013, the percentage of people who agreed to the statement dropped slightly to 61 percent while 32 percent disagreed.[232] In 2016, the percentage of people who agreed with this potential ban was 57 and 25 percent opposed[233] and in 2017, 48 percent agreed that a law against wearing a full body and face veil should be introduced while 42 percent agreed on the fact that people should be allowed to decide for themselves what to wear, including burqas.[234] As this shows, after Straw's statement in 2006, discussion started to develop and the majority of the questioned of the poll in 2006 agree with the opening of this debate. However, support in favor started to decline from 2006 onwards until at least 2017.

But why then do politicians still advocate in favor of a ban? And why then do parties like the UKIP and BNP still introduce the burqa ban in their manifesto in 2017? This probably has more to do with political symbolism and to create support that one otherwise would not have gained than with strengthening and securing society. Already in 2006, a member of the parliament from the Labours, who did not want his name exposed throughout his interview, stated as a reaction to Straw and Griffith that '[t]here are far more important problems in society than a small number of Muslims who wear veils. To call them selfish is totally wrong and will encourage Muslims to think they are being persecuted. This issue is more to do with jockeying for position in the Labour leadership than in improving community relations'[235]. Another

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230 Ipsos MORI, 'Muslim Women Wearing Veils', 17-10-2006, https://www.ipsos.com/ipsos-mori/en-uk/muslim-women-wearing-veils (accessed on 03-05-2019).

231 YouGov, 'Yougov Survey Result', April 2011, http://cdn.yougov.com/today_uk_import/yg-archives-pol-yougov-burqa-130411.pdf (accessed on 05-05-2019).

232 YouGov, 'Yougov Survey Result', September 2013, http://cdn.yougov.com/cumulus_uploads/document/7kfoc0tfiq/YG-Archive-Pol-Sun-results-170913-the-Burhka.pdf (accessed on 05-05-2019).

233 YouGov, 'Yougov Survey Result', August 2016, https://d25d2506sfb94s.cloudfront.net/cumulus_uploads/document/evirrw1hn5/InternalResults_160825_Burka_Burkinis.pdf (accessed on 05-05-2019).

234 Yougov, 'Yougov Survey Result, April 2017, https://d25d2506sfb94s.cloudfront.net/cumulus_uploads/document/8nchxu7nac/TimesResults_170426_VI_Trackers_W.pdf (accessed on 05-05-2019), 1-15, 13.

235 S. Walters and J. Oliver, 'It's Selfish to Wear the Veil, Says Straw Aide', *Mail Online* 07-

example is given with regard to statements made by Boris Johnson in 2017. Heutlin argues that '[t]here's no pending to ban face veils in the United Kingdom. But there is speculation that Johnson, who has his eyes on the conservative party leadership, decided to woo his party's base by dissing women who wear the veil in Trump-style plain-speak, while citing enough John Stuart Mill to give him some cover for the intolerant remarks'[236]. Furthermore, she argues that '[m]ainstream political parties introduced most existing bans after 9/11 amid rising Islamophobia. But the current rash of burqa-ban proposal have largely been championed by far-right parties (…) Now, more moderate parties are increasingly incorporating elements of far-right platforms into their own agendas'[237]. Even though these are just two examples, the idea is that the burqa ban is used by politicians in order to gain more support and not even only by far-right groups, but also more moderate parties.

But still, even though there is division between politicians in several parties, the burqa ban still lacks sufficient support in order to become implemented. How can this be explained? This probably has to do with the kind of multiculturalism Britain has. Because British background lies in an established state church where liberal tolerance is afforded to both religious as non-religious persons, Britain is relatively very tolerant. As Mark Hill notes, '[w]hen combined with the large scale-immigration from Commonwealth nations in the latter part of the twentieth century, one is left with a population which is ethnically, racially, religiously and socially diverse and, in large measure, assimilated'[238]. Because of this diversity, it is unthinkable that the wearing of the burqa would be criminalized.[239] Furthermore, most politicians who do not advocate in favor of a ban are well aware that the measure is related to Islamophobia, which is not beneficial for international relations. For instance, Phil Woolas said that in Britain, they risk being painted abroad as being Islamophobic and, in addition, said that '"people in my constituency say they have received calls from members of their family abroad saying, "Are you still safe in Britain?" They are being told by their news programmes that

10-2006, https://www.dailymail.co.uk/news/article-409183/Its-selfish-wear-veil-says-Straw-aide.html (accessed on 05-05-2019).

236 J. Huetlin, 'The Politics of Pointless Burqa Bans: European Centrists are Increasingly Adopting Elements of Far-Right Platforms', *The New Republic* (24-08-2018), https://newrepublic.com/article/150846/politics-pointless-burqa-bans (accessed on 05-05-2019).

237 J. Huetlin, 'The Politics of Pointless Burqa Bans: European Centrists are Increasingly Adopting Elements of Far-Right Platforms', *The New Republic* (24-08-2018), https://newrepublic.com/article/150846/politics-pointless-burqa-bans (accessed on 05-05-2019).

238 Hill QC, 'Legal and Social Issues Concerning the wearing of the Burqa and Other Head Coverings in the United Kingdom', 98.

239 Ibidem, 98.

Muslims are being forced to dress as non-Muslim"[240]. Because of this awareness, they call for a unification that cannot undermine the multicultural society. In other words, even though the multicultural policy knew some bumps on the road, and even though it still needs to be worked on, Britain could still be considered as a multicultural society which is why the burqa has not been banned yet. Immigration is perceived as a problem by the political parties, but is not seen as the core of British problems by the two biggest parties.

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[240] S. Walters and J. Oliver, 'It's Selfish to Wear the Veil, Says Straw Aide', *Mail Online* 07-10-2006, https://www.dailymail.co.uk/news/article-409183/Its-selfish-wear-veil-says-Straw-aide.html (accessed on 09-05-2019).

Chapter 4: Conclusion

In this paper, research has been done on the relation between the burqa debate on the one hand, and multiculturalism on the other. The main question to be answered is the following: Why did the Netherlands choose to implement the burqa ban in 2018 while Britain so far did not even though both countries are multicultural? By the use of both secondary and, mostly, primary sources an answer has been sought to this question.

Before delving into this, and thus the main part of this research, first an important chapter had to be outlined that provided as the body of this research, namely the theoretical debate. This chapter started by giving an outline of the word multiculturalism used throughout this paper, sketching the link between multiculturalism, assimilationism and terrorism, and complemented these two aspects with the theory of minority rights by Will Kymlicka and the theory on the politics of recognition by Charles Taylor. After this, both the pros and cons whether the burqa ban should be implemented were outlined. The first argument in favor of the burqa ban was made with regard to gender equality. This took several forms. However, the main argument was that women wearing this burqa were being oppressed and that it is up to western societies to intervene while it is contradicting with the human rights declaration. A counterargument is made on the same human rights declaration that claim that there should be freedom of religion and that the state cannot violate this right. It is also argued that the idea of oppression is exaggerated in western societies and research showed that multiple women were wearing this garment out of free will and sometimes even against the will of the family. The second argument made by pro-ban supporters is made on grounds of security issues. Broadly seen, the burqa is linked to radicalization and terrorism. The fear exists that burqa wearers have destructive weapons underneath their burqa and that the burqa contributes to the idea of radicalization. This argument is countered by people claiming that terrorist attacks rarely involve people wearing a burqa plus the fact that it is discriminating banning wearing the burqa out of fear; these women are criminalized without any reason. A third argument is made on grounds of humanitarian, psychological and other physical and mental considerations and wearing the burqa would have severe mental and physical disadvantages. However, this is countered by people claiming that these women only wear the burqa when they go out in public and if they are not allowed to wear it anymore, they will fall into social isolation. The final argument also considers social isolation and pro ban supporters claim that others within society do not like the sight of women wearing burqa's in public and it might make them feel uncomfortable. However, also this is countered because this is an argument made on feelings

of fear, which is not rational. This paper, then, wanted to provide insight on what effect terrorism and this feeling of fear could play on the execution of the policy of multiculturalism and how this possibly initiated a debate to ban the burqa.

After this, in chapter two a look has been given to the case of the Netherlands. The sub-question posed throughout this chapter was: How does implementing the burqa ban fit into the Dutch perception of having a multicultural society? In order to look at this question, this chapter was divided into four parts. First, a look was given at the historical overview of both the multicultural policy and the debate on the burqa ban. As the idea of multiculturalism knew a long history, in the '90s of the previous century it became an official policy within society. However, after 9/11, the policy of multiculturalism was on its detour and politicians more often considered it as something that did not fit within the Netherlands anymore. When one looks at the burqa ban, a link is tried to be sought between the deterioration of the policy of multiculturalism and the implementation. Where at the beginning of 2000 face-veiled women were still protected, this shifted in 2003 and in 2005 an official motion was submitted by Wilders. From this point onwards, it became subject of debate and in 2018, a partial burqa-ban was approved. Interesting to see is what role terrorism played in both the deterioration of the policy of multiculturalism and the implementation of the ban. This was outlined in the second section where a look was given at the context of this debate. When did the debate take place? As became apparent, as the terrorist attack of 9/11 proved to be a turning point in the policy of multiculturalism, the assassination of Fortuyn and van Gogh, of which the second could strongly be considered as terrorist attack, proved to be the point of which the debate gained enough support in order to become an official topic of debate within the Dutch politics. These events widened the gap between Muslims and non-Muslims and further polarization became a fact. The third section, then, went into depth into the arguments made in this debate. What were the arguments and what were the parties? Not a lot controversy existed within the political parties whether this ban should be implemented. The question was whether it should be a partial or general ban. Most of these arguments were made based on the idea that the security of the society is at stake and that the wearing of the burqa posed a threat to society. Only a few would argue against such a ban, mostly from the Christian Party, on grounds that such a ban is in conflict with the freedom of religion. Section four, then, looked at these arguments and wanted to see what kind of arguments these are. Are they more multicultural or assimilationist? One of the leading figures investigating the burqa case in the Netherlands, Annelies Moors, argued that most of this sentiments between politicians comes from a feeling of fear, which could not be seen as rational or legitimate in order to implement a ban. This feeling of fear was very well

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played on by populist politicians – like Fortuyn, Wilders and Baudet – and more right-wing political parties – like the VVD and CDA – who argued that immigration should be put a hold to and that immigrants should assimilate into the Dutch society, even if this means that they need to let go of their own culture, norms and values. In other words, the Netherlands shifted from a policy of multiculturalism that was focused on adaptation to a policy of assimilation where the burqa ban could be seen as a reaction to this shift.

However, chapter three, and thus the case of Britain, showed a different picture when compared to the case of the Netherlands. The sub-question in this chapter was as follows: How does opposing a burqa ban fit into the British perception of having a multicultural society? The same four aspects as in the previous chapter were used throughout this chapter in order to make a valid comparison. First a historical overview was presented of both the development of the policy of multiculturalism and the debate on the burqa ban. The idea of multiculturalism within Britain could be traced back to the 19th century where Muslims started to settle in Britain. In the second half of the 20th century, the New Commonwealth migration proved to be a problem for Britain. However, by implementing new laws that kept a control on the influx of migrants, the idea of Britishness and multiculturalism was able to flourish. In the '90s, this policy became prominent. But after 9/11, the policy of multiculturalism was questioned more often by politicians. Furthermore, in 2006, the debate on the burqa was initiated by Jack Straw. This proved to ignite a debate within society that lasted but did not lead to the implementation of this ban yet. The second section, then, looked at the context of the debate and the question when the debate took place. As outlined, the debate strongly seems a reaction to the terrorist attack in the London metro station on July 7, 2005. The debate opened up by Straw, then, could be perceived as a reaction to this attack where the relation between Muslims and non-Muslims was damaged and further polarization and Islamophobia could be seen as a reaction. The following section outlined the arguments made by politicians within this debate throughout the years. The two biggest parties did not take up the burqa ban as a point in their manifestos but the three more right-wing parties – BNP, UKIP and EDL – did make it an official part of their manifestos. However, within all of these parties, a lot of division existed between the politicians whether a ban should be implemented. Most arguments are not made on ground of security issues and terrorism, even though this should not be neglected, but are made on grounds of separation and division within society between different groups. But what is seen, is that there existed so much division within parties and between parties on this topic, that no decision has been made yet to ban the burqa. The final section looked at these arguments. Mainly, the focus in this section was if these arguments could be seen more as multicultural or assimilationist. The arguments

made by these politicians tend to be made more on the idea of multiculturalism. If one looks at the political parties and their program, a shattered political landscape prevails. It seems that in Britain, where this division within parties and between parties prevails throughout the debate, this division also marked the political landscape throughout these years. The biggest parties did not support this ban. This has to do with two things. The first thing is that in Britain, politicians are aware of the fact that Islamophobia prevails, where they try to resist this trend. The second aspect why no majority support was created within Britain to ban the wearing of the burqa has to do with the type of multiculturalism. This means that not enough support was created in favor of the ban within the politics and no ban thus far has been implemented. Even though the politics of multiculturalism have had to overcome some though times, they never fully distanced themselves from this policy. This is why the ban is not implemented.

In sum, in both countries it could be seen that the terrorist attacks ignited the debate within these countries. However, the political landscape proved to be very important in the way this discourse developed and what the outcome of this debate is. Both the way of how politicians view multiculturalism and how they act based on this proves to be crucial whether a shift towards a policy of assimilation occurs. And this potential shift, in turn, decides whether the ban will be implemented. However, this is a conclusion drawn on two cases. In order to see whether this is right more research could be done to multiple cases. For instance, in France the ban was also implemented after years of debate and even though a policy of multiculturalism was executed. But also in Denmark and Belgium a ban was implemented. Could one see the same here as in the Netherlands? Also, other countries, like Germany and Switzerland, debated whether a ban should be implemented but so far did not do this. How could this be explained? Could this be matched to the case of Britain? Another important factor is the history of Islamophobia within these countries. Does this also play a big part in the implementation of this ban? This could be investigated into more depth. Further research could also focus more on an aspect that has not been dealt with extensively throughout this paper, namely the role of media. Even though it is touched upon a couple times, the usage of media also proves to be important in order to polarize between different groups within society and more attention could be given to this aspect. But not only this, also the way politicians use the media in order to support their campaigns. Also, since this paper focused on the discourse between politicians and how newspapers drew their arguments, other discourses were neglected. Further research could also delve into the discourse between other aspects in daily life – like citizens, journalist, opinion pieces, etc.

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