Serdar Kaya*

State Policies toward Islam in Twenty Countries in Western Europe: The Accommodation of Islam Index

Abstract: This study creates an index that reveals the extent to which Western European countries accommodate Islamic traditions and practices. The index covers six realms in which Muslim communities seek accommodation: (1) education, (2) chaplaincy services, (3) mosques, (4) cemeteries, (5) Islamic attire, and (6) halal food. The study examines and quantifies the state policies in twenty Western European countries on both national and municipal levels with a particular focus on actual implementation. Results indicate that Western European countries vary widely in terms of their accommodation of Islam. There are also notable within-country differences, due in part to regional governments, as they also make and/or implement policy decisions. Both between- and within-country variations in the accommodation of Islam reveal a variety of nuances, and blur dual categories, such as ethnic-civic and assimilationist-integrationist.

Keywords: immigration, index, Islam, Muslims, multiculturalism, Western Europe

Introduction

A series of large immigration inflows rendered Western European societies multiethnic in the course of the twentieth century (Dancygier and Laitin 2014). Governments approached this development in different ways (Bleich 2003), and made different policies toward immigrants and immigration in their efforts to manage diversity (Parekh 2000; Banting and Kymlicka 2013). Earlier scholarship characterizes these policy responses to diversity in dual categories such as ethnic versus civic, and assimilationist versus integrationist (Brubaker 1992; Koopmans and Statham 2000). An emerging body of works quantifies state policies in order to introduce some nuance to these rigid categories. As Bjerre et al. (2015) indicate in their comprehensive review, this is a new field that

*Corresponding author: Serdar Kaya, Department of Political Science, Simon Fraser University, 8888 University Drive, Burnaby, British Columbia V5A1S6, Canada, E-mail: ska99@sfu.ca
emerged around the turn of the millennium, primarily among economists (Timmer and Williams 1998; Givens and Luedtke 2005; Pham and Van 2014), and then expanded into the realm of state-religion relations (Fox 2008; Grim and Finke 2011). More recently, migration scholars have gauged various dimensions of citizenship and diversity policies in order to offer more reliable measures (Gest et al. 2014; Helbling and Vink 2013; Koopmans et al. 2005).

This study contributes to that subliterature by creating an index that quantifies the state policies toward Muslim immigrants in particular, and not immigrants in general. The case of Muslims is analytically important in that it involves a relatively greater degree of (real or perceived) cultural distance (Sniderman and Hagendoorn 2007). In addition, the accommodation of Islam remains a salient case, as Muslims now constitute approximately 4.4 per cent of the Western European population (PRC 2011). Still, there are currently no comprehensive, country-level data that gauge the variation in the policies toward the accommodation of Islamic traditions and practices. This study fills that gap by examining the six major policy realms that have been central to the involved debates in Western Europe, especially since the 1980s: (1) the education of Muslim children in public schools, and the state funding for Islamic schools, (2) chaplaincy services offered by imams in state institutions, (3) restrictions on mosques, (4) Muslim cemeteries, (5) Islamic attire, especially the veil, and (6) the production and provision of halal food.

The following sections quantify the policies on each realm in twenty Western European countries, with a specific focus on implementation in an effort to gauge actual accommodation. The study calculates an overall index score for each country under review, and compares these scores to those of similar indices on cultural rights, secularism, and multiculturalism. The scores reflect the degree of accommodation as of 2015.

Method and Structure

The Accommodation of Islam (AOI) index has six components that correspond to the six aforementioned policy realms. These six realms are highly comprehensive, but they are by no means all-encompassing, as they do not cover less salient policy issues such as male circumcision, or time off for Muslim

---

1 These countries are: Austria, Belgium, Britain, Cyprus, Denmark, Finland, France, Germany, Greece, Iceland, Ireland, Italy, Luxembourg, Malta, the Netherlands, Norway, Portugal, Spain, Sweden, and Switzerland.
employees during religious holidays. Instead, the index focuses on the major realms in which Muslims have sought accommodation, and faced resistance for several decades.\footnote{There is a wide consensus in the literature on the salience of these six realms (Cesari 2005; Özyürek 2015; Tatari 2009).}

The coding is on a scale of 0.00–1.00, in increments of 0.25. Zero corresponds to ‘little or no accommodation,’ and 1.00 to ‘near or full accommodation.’ In the end, the six category scores average out to create an overall index score for each of the twenty countries under review. (See the Appendix for further details on coding.) In three categories, policy scores reflect the degree of equality between the majority religion and Islam: Education, Mosques, and Chaplaincy. For example, the scores for imams’ access to public institutions for chaplaincy services involve comparisons with the access allowed to priests. This coding choice was made in an effort to reveal the extent to which a state accommodates Islam relative to the majority religion. Put differently, the scores for these three realms do not measure multiculturalism, or the promotion of cultural diversity. Rather, they reflect the degree to which state policies approach Islam and the majority religion on equal terms. Accordingly, a score of 1.00 marks near or full equality in the corresponding policy area, while a score of 0.00 is an indication of little or no equality.

One advantage of this equality-based approach is that it accounts for contextual differences. For example, in some Western European countries, such as Finland, there are very few private schools (Pauha and Martikainen 2014). In contrast, ‘two-thirds of all primary schools’ in the Netherlands are not public institutions (Entzinger 2009). Given that contextual difference, it would be misleading to assess the equality in accommodation by looking only at the absolute degree of state funding for Islamic schools. Comparing Islam to the majority religion helps avoid that mistake.

Not all policy issues regarding Islam have a Christian equivalent, however. Some issues are uncustomary, if not controversial, in Western contexts, and often involve special arrangements. Halal food, the headscarf, and Islamic burial traditions do not have majority equivalents, and thus necessitate ad hoc arrangements.\footnote{Among the three, the headscarf is a somewhat gray area, as it exists in Jewish and Christian traditions as well. However, it is no longer widely practiced in Western contexts. In fact, the arguments for the restrictions and bans on the Islamic veil often involve women’s rights, and characterize it as antithetical to Western values.} Therefore, the policy scores in the remaining three categories reflect the absolute degree of accommodation, and do not involve any comparisons between Islam and the majority faith.
When assigning scores to individual countries and policy realms, the study consults a wide variety of scholarly sources to ensure accuracy. Case studies are of critical importance in that regard, especially considering their capability to identify the discrepancies between the policies on paper and the actual practices on the ground. Another issue is within-country variation. It is not rare for local authorities in Western Europe to resist accommodation, sometimes in complete disregard for the legislation on the national level. For example, even in Britain, where building a mosque is as easy as 'build[ing] any other kind of house of worship' (Fetzer and Soper 2005), local authorities sometimes discriminate against mosque projects (Gale 2005). Case studies that focus on the local level are especially helpful in identifying such arbitrary actions.

The Attribution of Index Values

Education

Two subcategories make up the Education category: the teaching of Islam in public schools, and state funding for schools owned by religious institutions. Central to both policy issues is equality, which state policies address in quite different ways. Britain has transformed the existing religion course into a multicultural one (Hussain 2014). Similarly, Sweden offers only a non-denominational course titled Religious Knowledge (Religionskunskap) (Berglund 2010). Finland requires public schools to offer a course on Islam if three or more students in a municipality ask for it. The Religious Freedoms Act of 2013 extended that policy by introducing a course for each religion that has a following in the country (Pauha and Martikainen 2014). Under that system, students cannot ask for an exemption, due to the presence of a non-denominational alternative. Luxembourg gives all students the option to choose either a Religion and Ethics course or an Ethics and Civics course. The contents of both courses are intercultural. Belgium allows the teaching of Islam, and pays the salaries of the Muslim teachers appointed by the Muslim Executive of Belgium (Fadil 2014). Finally, France does not offer any courses on any religion, and leaves all religious education to parochial institutions.

Although they are very different from one another, these four policy choices in six countries are highly egalitarian in their own ways. Therefore, they all score 1.00 in that subcategory. Varieties of these four policy options exist in most other Western European countries, but they score lower to the extent they are less inclusionary. The Netherlands tends to make religion courses largely
universal and ethics-based, but parents reserve the right to a denominational education for their children. If a sufficient number of parents choose to do so, an accredited teacher (often a clergy member) is appointed, and the municipality pays for the expenses. However, in practice, parents rarely exercise that right. Laws in Spain make it possible to offer courses on four religions: Catholicism, Islam, Judaism, and Protestantism. Among them, only the course on Catholicism is mandatory, and it is still unclear when exactly one of the other three should be offered. Austria is similar to Belgium on the teaching of Islam, but it scrutinizes the course content (Schmidinger and Çakır 2014). Countries with such mild shortcomings score 0.75 in that subcategory.

Four countries score 0.50. Public schools in Norway and Switzerland have traditionally been more denominational in their teaching of religion. Norway revised some of the contents of its Christianity course in 2008, after a decision by the European Court of Human Rights to that effect, but the coverage on Islam in public schools is still low (Leirvik 2014). Swiss cantons also seem to be in the process of making their religion courses less denominational, but not all cantons have made the transition yet (Tunger-Zanetti and Purdie 2014). Finally, Cyprus and Greece are unique cases in that they have autochthonous Muslim minorities. Accommodation in these two countries is largely limited to the regions where non-immigrant Muslims have a strong presence (Dayıoğlu and Hatay 2014; Tsitselikis and Sakellariou 2015).

Five countries score 0.25: Denmark, Germany, Ireland, Italy, and Portugal. The courses in Denmark, Ireland and Italy focus primarily on Christianity (Jacobsen 2014; Scharbrodt and Coglievina 2014; Colfer 2015). The courses in Germany now differentiate between non-denominational (Religionsunterricht) and normative (Religiose Unterweisung or Religionskunde) teachings of religion, but due to Islam’s lack of public-law-corporation (Körperschaft des öffentlichen Rechts) status, most German Lands do not offer a course in Islam. Moreover, in many cases, Muslim students take neither the non-denominational nor the normative course, and simply opt out. Portugal is somewhat different from these four countries in that it offers a course on Islam, provided that ten or more students ask for it. That is a much higher bar than the minimum requirement of three in Finland. As a result, the chances for the course to get offered are always low (Mapril and Tiesler 2014). Finally, Iceland and Malta score 0.00, as they offer a course on Christianity only, and Islam is not covered in the curricula (Larsson and Sigurdsson 2014; Zammit 2014).

4 In Italy, foreign schools in several cities offer courses on Islam.
5 For further details on the variation in the policies of German Lands, see Fetzer and Soper (2005).
The second category under Education involves the equal funding of the schools owned by churches and Islamic institutions. The highest ranking countries in that subcategory are Denmark and the Netherlands. Denmark has a tradition of privately-owned independent schools, whose expenses are partially paid by the state. It is not major churches or other religious organizations but small groups of citizens who establish these schools, and undertake their expenses. The independent school system does not discriminate across ethnic lines, and all citizen groups that choose to build an independent school benefit from state support equally. The case of the Netherlands is less idiosyncratic, as denominations establish their own private schools. Like the followers of other religions, Muslims too operate their schools in the Netherlands, and receive their fair share of state funding.

Denmark and the Netherlands are rare cases, however. Eight countries in Western Europe almost exclusively fund church schools, and thus score 0.00 in that subcategory: Cyprus, Finland, Iceland, Italy, Luxembourg, Malta, Spain, and Switzerland. Most of the remaining countries are closer to the exclusionist end of these two extremes. In Belgium, France, Germany, Greece, Ireland, Norway and Portugal, Islamic schools receive much less funding than church schools, and score 0.25. In other words, these countries do not reject funding for Islamic schools categorically. For example, France funds thousands of Catholic schools, but only one Islamic school: Lycée Averroes, a private institution founded in Lille in 2003. After repeated calls for funding by school administrators, the French government agreed to grant the school the status of ‘establishment under contract’ in 2008. The Ministry of Education pays the salaries of its teachers (Cesari 2016). There are only three countries that score 0.75 (Sweden), or 0.50 (Austria, Britain). In other words, all but five of all twenty countries under review are located in the lowest two ranks of this subcategory.

Chaplaincy

The Chaplaincy category focuses on the degree to which state policies allow the Muslim clergy access to hospitals, prisons, and the military in order to council Muslims. Another dimension of state policies in that realm is the compensation of the clergy members for their services. All scores reflect the privileges of Muslim clergy in comparison to their Christian counterparts. For example, a

---

6 In most cases, the schools owned by Islamic institutions do not devote more hours to religious education, but where legally possible, they do offer a course on Islam, rather than Christianity or one of its denominations.
state that pays neither Christian nor Muslim chaplains for their services does not necessarily score low in that category, but a state that employs only Christian chaplains does.

Two countries score 1.00: Britain and France. The rules that govern chaplaincy services are different in these two countries, but they both offer chaplains similar levels of access and support, regardless of their religious identity. Procedures and arrangements often vary in terms of access and payment, however. For example, in France, only the chaplains in the military have a legal status, whereas others who serve in hospitals and prisons do so as volunteers (Frégosi 2014), and in Britain, chaplains in the prison system are state employees, and they work exclusively in prisons (Hussain 2014).

Belgium, the Netherlands, and Portugal fall slightly short of that degree of accommodation, and score 0.75. In Belgium, approximately one-third of all inmates are Muslims, and Muslim chaplains are able to offer services to them. They have a similar level of access to hospitals as well (Fadil 2014). Their status in the military, however, is still in the planning stage, due at least in part to the fact that military chaplaincy is less institutionalized as a unit in the small Belgian military (Michalowski 2015). In the Netherlands and Portugal, the church has a more established status in state institutions. Although imams have near-full access, they receive relatively less support (Ajouaou and Bernts 2014; Mapril and Tiesler 2014).

Four countries score 0.50: Austria, Denmark, Greece, and Spain. In Austria, chaplains work in prisons and hospitals, but they do not have a formal status in the military (Michalowski 2015). Denmark and Greece allow imams for voluntary work only, and offer them little or no support. Spain has been paying imams for their chaplaincy services in prisons since 2007, and the system works well. However, imams work on a voluntary basis in hospitals, where Islamic organizations are not always able to offer free services. Preparing the deceased for burial is also a task often performed by imams, and the inadequacy of services sometimes leads to problems (Moreras 2014).

Ten countries score 0.25: Finland, Germany, Iceland, Ireland, Italy, Luxembourg, Malta, Norway, Sweden, and Switzerland. These countries either limit access to imams or have policies that result in rare visits. Policies in Italy and Germany are typical examples of the latter. In Italy, the law allows access to the clergy of all religions, but actual practices are quite different. Imams need authorization from the director of the facilities, as well as a certificate issued by an Islamic organization, but the former is not always granted.

---

7 In Denmark, there are no Muslim chaplains in the military, but prisons have had imams since 2002. Some hospitals also have imams (Jacobsen 2014).
(Coglievina 2014). In Germany, imams make special arrangements with individual institutions. Some hospitals respond positively to these requests. The Ministry of Defense, however, requires the presence of at least 1,500 registered Muslim soldiers for a Muslim chaplain to qualify for a visit. An additional condition is that another imam recognized by a concordat (Staatsvertrag) must accompany the chaplain. Muslims in Germany have not yet been able to meet these requirements (Rohe 2014).

Finally, Cyprus has no laws or regulations regarding chaplains, and allows their services on an ad hoc basis. It also differs from other Western European countries in that it does not allow Muslims to serve as soldiers in the military (Dayoğlu and Hatay 2014), which renders Muslim chaplaincy a non-issue, but indicates deeper problems regarding equality. It is the only country that scores 0.00 in that category.

**Mosques**

Three subcategories make up the Mosques category: permits, architecture, and the call-to-prayer. The first subcategory gauges how difficult it is to obtain a permit for a mosque, in comparison to obtaining one for a church. None of the twenty countries under review makes it extremely difficult to obtain a mosque permit; however, there are no countries in Western Europe that issue a permit for a mosque as easily as one for a church. The scores thus vary within the narrow range of 0.25–0.75. Countries with a score of 0.75 typically issue mosque permits relatively easily: Belgium, Britain, France, Germany, Iceland, the Netherlands, Norway, Portugal, and Spain.\(^8\) In countries with a score of 0.50, permits are more difficult to obtain in many municipalities: Austria, Denmark, Finland, Greece, Ireland, Italy, Luxembourg, Malta, Sweden, and Switzerland. Finally, Cyprus is the only country that scores 0.25 in that subcategory, as Muslims there face greater difficulties in obtaining a permit.

The architecture subcategory is slightly more dispersed, with two countries on the two ends of the spectrum. On the exclusionist end is Switzerland, where minarets have been banned since the referendum in 2009. On the accommodationist end is the Netherlands, where restrictions on Islamic architecture are minimal. The remaining countries fall within the narrow range of 0.25–0.75.

---

\(^8\) It must be noted that mosque permits were more difficult to obtain in most of these countries in the past. For example, at least sixty conflicts occurred over mosque projects between 1990 and 2008 in Spain. Due to the intensity of these conflicts, many municipalities in Catalonia decided not to issue any mosque permits between 2002 and 2004 (Moreras 2010).
Countries that do not have a ban on Islamic architecture, but impose restrictions in most cases score 0.25: Austria, Finland, Greece, and Luxembourg. Those which impose restrictions in many cases score 0.50: Cyprus, Denmark, France, Ireland, Italy, Malta, Portugal, Spain, and Sweden. Finally, countries where restrictions on architecture are less common score 0.75: Belgium, Britain, Germany, Iceland, and Norway.

The third and final subcategory is the call-to-prayer, or the *adhan*, which is the Muslim equivalent of church bells. There are some important differences, however. First, the *adhan* is recited five times a day, shortly before each of the five daily prayers – which is more frequent than the ringing of church bells. Secondly, the first *adhan* of the day is recited before sunrise, and the fifth and last one some time after sunset. These two recitals may cause a disturbance in residential areas, especially during the summer, when days are longer. Third, the *adhan* is not merely a sound but a recitation of words, including declarations of faith, which non-Muslims do not share, and thus may prefer not to hear. Therefore, this study does not differentiate between the *adhan* permits with and without restrictions. Permits with reasonable time, zone, and volume conditions still qualify for full points.

Policies regarding the call-to-prayer are highly skewed, as most countries in Western Europe rarely allow it outside of a mosque, and even then there are restrictions. There are six exceptions. The Netherlands and France are the only countries that score 1.00. The Netherlands allows mosques to use loudspeakers for the call-to-prayer, although many do not exercise that right (Landman 2010). France achieves equality by applying the same restrictions to both mosques and churches: more than 2,000 mosques in France remain silent, along with the country’s churches (Marongiu-Perria 2010). Then comes Norway, which scores 0.75. Mosques in Oslo, which is more than eight percent Muslim, are allowed to recite the call-to-prayer on Fridays (Vintervoll 2000). Greece scores 0.50, due to

---

9 In the case of Austria, the ban is partial. In two Austrian states (Carinthia and Vorarlberg), minarets have been banned since the spring of 2008, a year and a half before the referendum in Switzerland (Fürlinger 2010). Greece is a unique case in that it grants more rights to Muslims in the Western Thrace region, but the purpose-built mosque project in the capital city of Athens has yet to start (Skoulariki 2010). Finland is somewhat similar to Greece in that regard, as its two purpose-built mosques are owned by a small community of Tatar Muslims, whose ancestors arrived in Scandinavia in the late 1800s, before the immigration inflows into Europe (Pauha and Martikainen 2014).

10 On a side note, numbers indicate that the proportion of purpose-built mosques hardly exceeds five percent in countries where state policies restrict Islamic architecture (Allievi 2010; Scharbrodt et al. 2015).
its differential policies in Western Thrace and elsewhere. Finally, Britain and Germany score 0.25, as few municipalities in these countries allow recitals.

Cemeteries

The Cemeteries category gauges the extent to which local governments issue permits for Muslim cemeteries or sections, and facilitate the observance of Islamic burial rituals and traditions, such as the positioning of graves toward Mecca, or coffinless burials. Denominational cemeteries are customary in most Western European societies. For others, such as Belgium and France, however, the neutrality of cemeteries is of great importance, and thus the issue presents a greater policy challenge. The first openly-multidenominational cemetery in Brussels was not inaugurated until 2002, and the issue still remains unresolved in many municipalities in Belgium (Manço and Kanmaz 2005). France is an interesting case in that regard, as it makes an exception for Muslims, although denominational cemeteries have been illegal since 1881 (Frégosi 2014).

All countries in Western Europe have made some policy arrangements for cemeteries to accommodate the needs of Muslim communities. Therefore, no country scores 0.00 in that category. The variation lies in the extent to which cemeteries or sections are available for Muslims to observe Islamic rituals and traditions. With about 70 Islamic burial sites, laws that allow coffinless burials within 24 hours, and hospitals that are equipped to perform full-body ritual washing (ghusl) of the deceased, the Netherlands is the only country with full accommodation in this category (Koning 2014). Eight countries score 0.75: Britain, Denmark, France, Iceland, Ireland, Malta, Portugal, and Sweden. Countries in that group typically fall short of full accommodation due to minor shortcomings. For example, in Britain, some municipal governments allow same-day and coffinless burials, while others do not (Gilliat-Ray and Birt 2010). Similarly, in Denmark, the new Muslim cemetery outside of Copenhagen allows coffinless burials, but the older ones usually do not (Jacobsen 2014).

Nine countries score 0.50: Austria, Belgium, Germany, Greece, Italy, Luxembourg, Norway, Spain, and Switzerland. These countries usually accommodate some traditions, and leave out some others. For example, in almost all regions of Italy, it is possible to find a Muslim section within one of the cemeteries. However, these sections are bound by the rules of the cemetery in which they are located, and these rules usually do not allow the observance of certain Islamic traditions (Bombardieri 2010). Within-country variation also exists. For example, there is a trend toward more accommodation in Germany and Switzerland, but many of the Lands and cantons have not adapted their
policies yet (Kreutz and Sarhan 2010; Lathion 2010). Similarly, in Spain, there are twenty-nine burial spaces, but more are needed; and coffinless burials are possible only in Andalusia (Moreras 2014). In Norway, hospitals accommodate the ritual full-body ablation, and there are some burial sections, but the existing policies do not allow the full observation of traditions (Leirvik 2014). Finally, Greece has made arrangements for Muslim cemeteries in Western Thrace, Rodos, and Kos, where most non-immigrant Muslims live, but problems persist in the rest of the country (Tsitselikis and Sakellariou 2015).

Finally, two countries score 0.25: Cyprus and Finland. Cyprus is a unique case, due to the division of the island after the Turkish invasion in 1974. Most Islamic traditions can be observed in Cyprus, but only three of the 148 Muslim cemeteries are in good condition (Dayıoğlu and Hatay 2014). In Finland, policies vary across municipalities. The Tatar community has two cemeteries, but they are not open to other Muslims (Pauha and Martikainen 2014).

**Islamic Attire**

The Islamic Attire category focuses on the legal restrictions on Islamic attire, and especially the headscarf in public schools, government offices, and other public places. It also takes into consideration the extent to which individuals who choose to wear Islamic attire face discrimination due to insufficient legal protection.

Most policies toward Islamic attire in most Western European countries are situated at or slightly above the center-point value of 0.50. The only Western European country that comes close to accommodating the Islamic headscarf in most civil and bureaucratic realms is Britain. Political and legal procedures against discrimination on the basis of religion are also highly effective in Britain. It thus scores 1.00. The other end of the spectrum is vacant. No countries score 0.00. Restrictions on the headscarf in Western Europe have never been as widespread as they once were, for example, in Turkey and Tunisia, where the bans previously included universities and many other public institutions (Aktaş 2006). In addition, except for France, no countries in Western Europe impose a nationwide ban on headscarves in public schools. Most of the existing restrictions are imposed by municipal or institutional policies. Therefore, France is the only country that scores 0.25.

Of the remaining countries, twelve score 0.50: Belgium, Finland, Germany, Greece, Iceland, Ireland, Italy, Luxembourg, Malta, the Netherlands, Spain, and Switzerland. These countries typically do not have any laws that impose a general ban on Islamic attire. However, many local governments and/or schools
in these countries restrict the use of headscarves. It is also rare in this group of countries to allow schoolteachers, police officers, or others in public service to wear headscarves. Six countries score 0.75: Austria, Cyprus, Denmark, Norway, Portugal, and Sweden. Bans on the headscarf are less common in these countries for not only those who use public services but also those who provide them.

**Halal Food**

Two subcategories make up the Halal Food category: exemptions for ritual slaughter, and the provision of halal food. Most Western European countries require the pre-stunning of animals, but only five do not grant exemptions for ritual slaughter: Denmark, Iceland, Luxembourg, Norway, and Switzerland (Bergeaud-Blackler 2007; Withnall 2014).\(^{11}\) However, these laws are implemented differently in each place. For example, although Norway explicitly bans unstunned slaughter, Islamic associations, Norwegian authorities, and slaughterhouses worked together to develop regulations that would satisfy all parties involved, and eventually reached a consensus (Leirvik 2014).\(^{12}\) Consensus on this issue often involves ensuring that pre-stunning does not kill the animal, and that death occurs due to loss of blood. In other words, the question is not the pre-stunning itself but the voltage level the slaughterhouse employs. This is why, for example, the Halal Food Authority, which certifies halal meats in Britain, allows halal labels on some pre-stunned animals (Hussain 2014). In contrast to Norway, Germany does not ban ritual slaughter, but it does require a permit. Yet German authorities have so far rejected most permit applications (Rohde 2014). In sum, ritual slaughter is illegal yet still performed in Norway, while it is legal yet de facto largely prohibited in Germany. The coding of this subcategory is worded so as to account for these variations in implementation. More precisely, Germany is a case where ritual slaughter is ‘legal with very strict conditions’ (0.25), while in Norway ritual slaughter is ‘illegal with workable exceptions’ (0.75). Similarly, Switzerland allows few exceptions for ritual slaughter (0.25) (Tunger-Zanetti and Purdie 2014), and in Luxembourg ‘almost

---

11 Other countries either allow unstunned slaughter or grant exemptions for ritual slaughter. They do not impose any conditions besides the regular public health laws. They are thus coded 1.00.

12 Similar discussions occurred in Sweden, where unstunned slaughter has been illegal since 1937. However, the authorities have been less successful in convincing the Muslim minority (Larsson 2014).
no exceptions are made’ even during *Eid Al-Adha*, the annual sacrifice feast (0.00) (Besch 2014).

The second subcategory under halal food involves its provision in public institutions, eateries, and supermarkets. Although the debates on ritual slaughter sometimes involve a complete ban on the import of halal and kosher meat products, none of these proposals has become law. It is legal to import halal and kosher items into all Western European countries, including those which restrict their production. In fact, halal items are widely available in European supermarkets and restaurants, especially in Muslim neighbourhoods. Therefore, no country scores 0.00 in that subcategory.

The provision of halal meat in the military, hospitals, prisons, schools, and other public institutions, however, is a different issue. No country in Western Europe has made halal food options available in most of its public institutions. Therefore, no country scores 0.75 or 1.00. The majority of cases correspond to the 0.50 condition: many school cafeterias, hospitals, and other institutions have made halal options available, while many others have not. There is variation within and across institutions as well. In the Netherlands, for example, some prisons offer only halal food, rather than make it available as an option (van den Heuvel and Huisjes 2009). Some Belgian schools also decided to serve only halal food; however, the decision led to controversies (Fadil 2014). Public institutions in several other countries offer very limited halal options, and thus score 0.25.

**The Index**

Table 1 provides the aggregated scores for both the Halal Food and Education categories. Table 2 provides the overall index values, based on the above policy scores for the six categories. Scores indicate that no countries in Western Europe accommodate Islam on par with Christianity in all six realms. No European countries categorically exclude Islam either. The values range from 0.319 (Switzerland) to 0.840 (the Netherlands). The arithmetic mean of scores is 0.512, and the median 0.507 (Greece and Spain).

The arithmetic means of individual policy scores indicate that the Call-to-Prayer subcategory has the lowest average value (0.188). Then comes State Funding for Schools Owned by Islamic Institutions (0.275). The Ritual Slaughter subcategory has the highest average value (0.763). Figure 1 illustrates the average accommodation level for each indicator in the index. Figure 2 illustrates the overall country index scores in the form of bar plots. Each bar also indicates the contribution of each individual category score on the overall figure.
As expected, the six categories have some degree of association. A correlation matrix of the six categories returns fifteen values, which range between .02 and .63, the median being .27. In addition, the six categories have a Cronbach’s Alpha score of .73, indicating strong internal consistency (Cronbach 1951).

### Correlations

Indicators of Citizenship Rights for Immigrants (ICRI) is probably the only existing policy index similar in content to the AOI (Koopmans, Michalowski, and Waibel 2012). The ICRI measures the rights of immigrants in ten Western countries.
European countries with eight sets of indicators that correspond to eight dimensions of immigrant rights. One of these eight sets is composed of seven indicators that measure cultural and religious rights of Muslim immigrants: (1) ritual slaughter, (2) the call-to-prayer, (3) mosques with recognizable architecture, (4) Muslim cemeteries, (5) coffinless burials, (6) imams in the military, and (7) imams in prisons. The ICRI index codes each of these policies as −1, 0, or 1, from exclusionist to accommodationist, and for four time points: 1980, 1990, 2002, and 2008. To make the above indicators better correspond to AOI categories, this section combines indicators four and five to compute a composite.

Table 2: Accommodation of Islam (AOI) index (2015).

<table>
<thead>
<tr>
<th>Country</th>
<th>Education</th>
<th>Chaplaincy</th>
<th>Mosque</th>
<th>Cemetery</th>
<th>Attire</th>
<th>Halal</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>0.625</td>
<td>0.500</td>
<td>0.250</td>
<td>0.500</td>
<td>0.750</td>
<td>0.750</td>
<td>0.563</td>
</tr>
<tr>
<td>Belgium</td>
<td>0.625</td>
<td>0.750</td>
<td>0.500</td>
<td>0.500</td>
<td>0.500</td>
<td>0.750</td>
<td>0.563</td>
</tr>
<tr>
<td>Britain</td>
<td>0.750</td>
<td>1.000</td>
<td>0.583</td>
<td>0.750</td>
<td>1.000</td>
<td>0.750</td>
<td>0.806</td>
</tr>
<tr>
<td>Cyprus</td>
<td>0.250</td>
<td>0.000</td>
<td>0.250</td>
<td>0.250</td>
<td>0.750</td>
<td>0.625</td>
<td>0.354</td>
</tr>
<tr>
<td>Denmark</td>
<td>0.625</td>
<td>0.500</td>
<td>0.333</td>
<td>0.750</td>
<td>0.750</td>
<td>0.500</td>
<td>0.576</td>
</tr>
<tr>
<td>Finland</td>
<td>0.500</td>
<td>0.250</td>
<td>0.250</td>
<td>0.250</td>
<td>0.500</td>
<td>0.625</td>
<td>0.396</td>
</tr>
<tr>
<td>France</td>
<td>0.625</td>
<td>1.000</td>
<td>0.750</td>
<td>0.750</td>
<td>0.250</td>
<td>0.750</td>
<td>0.688</td>
</tr>
<tr>
<td>Germany</td>
<td>0.250</td>
<td>0.250</td>
<td>0.583</td>
<td>0.500</td>
<td>0.500</td>
<td>0.375</td>
<td>0.410</td>
</tr>
<tr>
<td>Greece</td>
<td>0.375</td>
<td>0.500</td>
<td>0.417</td>
<td>0.500</td>
<td>0.500</td>
<td>0.750</td>
<td>0.507</td>
</tr>
<tr>
<td>Iceland</td>
<td>0.000</td>
<td>0.250</td>
<td>0.500</td>
<td>0.750</td>
<td>0.500</td>
<td>0.250</td>
<td>0.375</td>
</tr>
<tr>
<td>Ireland</td>
<td>0.250</td>
<td>0.250</td>
<td>0.333</td>
<td>0.750</td>
<td>0.500</td>
<td>0.625</td>
<td>0.451</td>
</tr>
<tr>
<td>Italy</td>
<td>0.125</td>
<td>0.250</td>
<td>0.333</td>
<td>0.500</td>
<td>0.500</td>
<td>0.750</td>
<td>0.410</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>0.500</td>
<td>0.250</td>
<td>0.250</td>
<td>0.500</td>
<td>0.500</td>
<td>0.125</td>
<td>0.354</td>
</tr>
<tr>
<td>Malta</td>
<td>0.000</td>
<td>0.250</td>
<td>0.333</td>
<td>0.750</td>
<td>0.500</td>
<td>0.625</td>
<td>0.410</td>
</tr>
<tr>
<td>Netherlands</td>
<td>0.875</td>
<td>0.750</td>
<td>0.917</td>
<td>1.000</td>
<td>0.500</td>
<td>0.750</td>
<td>0.840</td>
</tr>
<tr>
<td>Norway</td>
<td>0.375</td>
<td>0.250</td>
<td>0.750</td>
<td>0.500</td>
<td>0.750</td>
<td>0.625</td>
<td>0.542</td>
</tr>
<tr>
<td>Portugal</td>
<td>0.250</td>
<td>0.750</td>
<td>0.417</td>
<td>0.750</td>
<td>0.750</td>
<td>0.750</td>
<td>0.611</td>
</tr>
<tr>
<td>Spain</td>
<td>0.375</td>
<td>0.500</td>
<td>0.417</td>
<td>0.500</td>
<td>0.500</td>
<td>0.750</td>
<td>0.507</td>
</tr>
<tr>
<td>Sweden</td>
<td>0.875</td>
<td>0.250</td>
<td>0.333</td>
<td>0.750</td>
<td>0.750</td>
<td>0.375</td>
<td>0.556</td>
</tr>
<tr>
<td>Switzerland</td>
<td>0.250</td>
<td>0.250</td>
<td>0.167</td>
<td>0.500</td>
<td>0.500</td>
<td>0.250</td>
<td>0.319</td>
</tr>
<tr>
<td>Averages</td>
<td>0.425</td>
<td>0.438</td>
<td>0.433</td>
<td>0.600</td>
<td>0.588</td>
<td>0.588</td>
<td>0.512</td>
</tr>
</tbody>
</table>

Scale: 1.00 (Near or full equality/accommodation), 0.75 (Substantial equality/accommodation), 0.50 (Mediocre equality/accommodation), 0.25 (Some equality/accommodation), 0.00 (Little or no equality/accommodation).

Note: The values in the “Score” column are the products of the values in the preceding columns.

European countries with eight sets of indicators that correspond to eight dimensions of immigrant rights. One of these eight sets is composed of seven indicators that measure cultural and religious rights of Muslim immigrants: (1) ritual slaughter, (2) the call-to-prayer, (3) mosques with recognizable architecture, (4) Muslim cemeteries, (5) coffinless burials, (6) imams in the military, and (7) imams in prisons. The ICRI index codes each of these policies as −1, 0, or 1, from exclusionist to accommodationist, and for four time points: 1980, 1990, 2002, and 2008. To make the above indicators better correspond to AOI categories, this section combines indicators four and five to compute a composite.

The ten Western European countries that the ICRI covers are Austria, Belgium, Britain, Denmark, France, Germany, the Netherlands, Norway, Sweden, and Switzerland.
measure for cemeteries, and indicators six and seven to compute one for chaplaincy. Then, it calculates the Pearson’s correlation values. Figures for 2008 are used in the analysis. Table 3 provides the results. Correlations between
Table 3: Pearson correlations.

<table>
<thead>
<tr>
<th>Correlates</th>
<th>Correlation</th>
<th>n</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adhan</td>
<td>0.55</td>
<td>10</td>
</tr>
<tr>
<td>Architecture</td>
<td>0.61*</td>
<td>10</td>
</tr>
<tr>
<td>Cemeteries</td>
<td>0.68**</td>
<td>10</td>
</tr>
<tr>
<td>Chaplaincy</td>
<td>0.81**</td>
<td>10</td>
</tr>
<tr>
<td>Ritual slaughter</td>
<td>0.49</td>
<td>10</td>
</tr>
<tr>
<td>ICRI</td>
<td>0.65**</td>
<td>10</td>
</tr>
<tr>
<td>MPI</td>
<td>0.13</td>
<td>16</td>
</tr>
<tr>
<td>GRI</td>
<td>0.17</td>
<td>20</td>
</tr>
<tr>
<td>GFI</td>
<td>−0.07</td>
<td>20</td>
</tr>
<tr>
<td>SRI</td>
<td>0.34</td>
<td>20</td>
</tr>
</tbody>
</table>

*p < 0.10.
**p < 0.05.
***p < 0.01.

Abbreviations: ICRI (Indicators of Citizenship Rights for Immigrants), MPI (Multiculturalism Policy Index), GRI (Government Regulation of Religion Index), GFI (Government Favoritism of Religion Index), SRI (Social Regulation of Religion Index).

Notes: ICRI codes the scores for each measure as −1, 0 or 1. ICRI has two indicators for the Chaplaincy and Cemeteries categories: chaplains in prisons, and chaplains in the military for the former, and the legality of Muslim cemeteries, and the allowance of coffinless burials for the latter. These two subcategory pairs are added together before running the correlation tests, increasing the range from (−1,1) to (−2,2). See the above footnote for a list of the ten countries included in the analysis.

Sources: Grim and Finke (2006), Koopmans, Michalowski, and Waibel (2012), and MPI (2010).

The resulting five pairs range from .30 and .81, indicating a satisfactory degree of overlap.\(^\text{14}\)

The table provides the correlation figures between the overall index values as well. The correlation between the AOI and ICRI is important for validity purposes, as both indices measure similar phenomena. Correlations with other indices help reveal the extent to which the accommodation of Islam is associated with other phenomena. As expected, the AOI and ICRI correlate highly

\(^\text{14}\) The correlations might be stronger, if the two indices were more similar in nature and scope. The ICRI refrains from conflating policy with implementation. The policy coverages of the two indices are not identical. Nor do they have the same coding scale. Finally, there is a seven-year difference between the time points they code.
The correlation between the AOI and the Multiculturalism Policy Index, however, is surprisingly low, albeit positive (.13), indicating that multiculturalism policies and the accommodation of Islam do not necessarily go hand in hand. The remaining figures are three different indices on state-religion relations from Grim and Finke (2006), as adjusted by the ARDA (Association of Religion Data Archives) project: (1) government regulation of religion, (2) government favoritism of religion, and (3) social regulation of religion. Among the three, only the social regulation of religion indicates some correlation (.34).

### Conclusion

This study examined twenty countries in Western Europe in an effort to build an index that gauges the variation in their accommodation of Islam. The objective was to offer a more nuanced measure of state accommodation than dual categories. The resulting index values revealed a variety of within- and between-country variations, which suggests that Western European countries are far from being ideal types.

It is difficult to characterize any of the overall policy approaches of the twenty countries as purely ethnic, civic, assimilationist or integrationist. For example, the results reveal that France, which is the epitome of the assimilationist model, ranks quite high in most categories. One way to reconcile this counterintuitive finding in the case of France is to differentiate between the models of immigrant integration and the accommodation of minority cultures. Despite the overlaps between the two, the former involves social cohesion, whereas the latter derives from the core democratic principle of equality. One may reasonably argue that it is difficult for an advanced democracy to systematically ignore the cultural needs of its minorities, even though their accommodation sometimes interferes with its assimilationist model of integration. However, it is beyond the scope of this study to test the validity of that argument.

This study did not make any causal or normative claims. It merely measured the policy responses to an issue that has been salient in immigrant-receiving countries, especially in the past three decades, and created an index out of them. The components of the index are not weighted to avoid imposing a theoretical conviction about the salience of particular realms of accommodation over others. Researchers who measure the accommodation of Islam in Western
Europe with the AOI index are to decide whether to weight the realms, and how, in line with the nature of their projects. They may also deem it more appropriate for the purposes of their studies to omit certain realms, as in some cases certain parts can matter more than the whole.

**Acknowledgments:** Previous versions of this article were presented at the annual meetings of the Western Political Science Association (WPSA), and the Midwest Political Science Association (MPSA) in 2015. The author would like to thank Justin Gest, Christopher Soper, and the anonymous reviewers for their critical comments and helpful suggestions on earlier drafts.

**Appendix. Coding information**

**Islamic attire**

1.00: There are no legal restrictions on Islamic attire, and public institutions accommodate Muslim individuals with religious attire; and anti-discrimination laws effectively protect Muslims against unfair practices.

0.75: There are no legal restrictions on Islamic attire, and few schools or government offices restrict its use; and anti-discrimination laws are not always effective to protect Muslims against unfair practices.

0.50: There are no specific legal restrictions on Islamic attire, but many schools and government offices restrict its use, while many others do not.

0.25: Legal restrictions on Islamic attire exist in most schools and government offices.

0.00: Legal restrictions on Islamic attire exist in most realms of social life.

**Cemeteries**

1.00: Almost all municipalities with Muslim presence have Muslim cemeteries or sections, and the laws allow the observance of all Islamic burial rituals and traditions.

0.75: Most municipalities with Muslim presence have Muslim cemeteries or sections, and the laws allow the observance of most Islamic burial rituals and traditions.
0.50: Many municipalities with Muslim presence have Muslim cemeteries or sections, while many others do not; and the laws regarding the observance of Islamic burial rituals and traditions vary accordingly.

0.25: Some municipalities with Muslim presence have Muslim cemeteries or sections, and the laws allow the observance of some Islamic burial rituals and traditions.

0.00: Muslim cemeteries or sections do not exist, and the laws do not allow the observance of Islamic burial rituals and traditions.

**Mosques**

**a. Permits**

1.00: Obtaining a permit for a mosque is rarely or never more difficult than obtaining one for a church.

0.75: Obtaining a mosque permit is in some cases more difficult than obtaining one for a church.

0.50: Obtaining a mosque permit is in many cases more difficult than obtaining one for a church.

0.25: Obtaining a mosque permit is in most cases more difficult than obtaining one for a church.

0.00: Obtaining a permit for a mosque is almost never possible.

**b. Architecture**

1.00: There are little or no restrictions on Islamic architecture.

0.75: Restrictions on Islamic architecture exist in some municipalities, but are not very common.

0.50: Restrictions on Islamic architecture exist in many municipalities.

0.25: Restrictions on Islamic architecture exist in most municipalities.

0.00: There is a ban on certain elements of Islamic architecture.
c. Call-to-Prayer

1.00: The call-to-prayer is permitted, albeit with reasonable zone, volume and time limitations, or the call-to-prayer is subject to similar sets of rules and regulations as church bells.

0.75: The call-to-prayer is permitted in most municipalities, albeit with reasonable zone, volume and time limitations, but they are not as widely accommodated in the country as church bells.

0.50: The call-to-prayer is permitted in many municipalities, albeit with reasonable zone, volume and time limitations, and prohibited in many others, and they are not as widely accommodated in the country as church bells.

0.25: The call-to-prayer is permitted in few municipalities, albeit with reasonable zone, volume and time limitations, and they are far from being widely accommodated in the country as church bells.

0.00: The call-to-prayer is never or almost never allowed, and no similar restrictions are imposed on church bells.

Education

a. Course on Islam in public schools

1.00: Public schools almost never leave Muslim students in a position to either take a course on Christianity or request exemption. They offer several denominational courses, a non-denominational course, or leave religious education to parochial institutions.

0.75: Most public schools that offer a denominational religion course on the majority religion offer a course on Islam as well, if they have Muslim students.

0.50: Many public schools that offer a denominational religion course on the majority religion offer a course on Islam as well, if they have Muslim students.

0.25: Few public schools that offer a denominational religion course on the majority religion offer a course on Islam as well, when they have Muslim students.

0.00: Public schools almost never offer a course on Islam, and the existing religion courses focus primarily on Christianity, leaving Muslim students in a position to either take a course on Christianity or request exemption.
b. State funding for schools owned by Islamic institutions

1.00: The state funds both Christian and Islamic schools to similar extents.

0.75: The state funds Islamic schools generously, but not as generously as it funds Christian schools.

0.50: The state funds Islamic schools, but poorly in comparison to Christian schools.

0.25: The state funds Islamic schools, but very poorly in comparison to Christian schools.

0.00: The state almost exclusively funds Christian schools.

Chaplaincy

1.00: All clergy members have equal access to public institutions, and enjoy about the same level of privileges and state support, regardless of their religious affiliation.

0.75: The members of the Muslim clergy are able to counsel the patients in hospitals, soldiers in the military, and/or inmates in prisons; and they enjoy most but not all of the privileges that their Christian counterparts have in regard to access to facilities or state support.

0.50: The members of the Muslim clergy are able to counsel the patients in hospitals, soldiers in the military, and/or inmates in prisons; but they enjoy some of the privileges that their Christian counterparts have in regard to access to facilities or state support.

0.25: The members of the Muslim clergy are able to counsel the patients in hospitals, soldiers in the military, and/or inmates in prisons; but they enjoy very little of the privileges that their Christian counterparts have in regard to access to facilities or state support.

0.00: Unlike their Christian counterparts, the members of the Muslim clergy are not able to counsel patients in hospitals, soldiers in the military, and/or inmates in prisons; and they enjoy almost none of the privileges that their Christian counterparts have in regard to access to facilities or state support.
Halal food

a. Ritual slaughter

1.00: Ritual slaughter is legal.

0.75: Ritual slaughter is either legal with some conditions, or illegal with workable exceptions.

0.50: Ritual slaughter is either legal with strict conditions, or illegal with few exceptions.

0.25: Ritual slaughter is either legal with very strict conditions, or illegal with very few exceptions.

0.00: Ritual slaughter is illegal, and almost no exceptions are made.

b. Provision

1.00: Halal food options are available in almost all school cafeterias, hospitals, prisons, and supermarkets/restaurants.

0.75: Halal food options are available in most school cafeterias, hospitals, prisons, and supermarkets/restaurants.

0.50: Halal food options are available in many school cafeterias, hospitals, prisons, and supermarkets/restaurants, and unavailable in many others.

0.25: Halal food options are available in few school cafeterias, hospitals, prisons, and supermarkets/restaurants.

0.00: Halal food options are almost never available in school cafeterias, hospitals, prisons, and supermarkets/restaurants.

References


