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**Comparison of approaches to the radical
Islam and the integration of Muslims in
selected EU member states**

Master thesis

Prague 2016

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Academic year: **2015/2016**

Bibliographic note

RAFFAJ, Ivan. Comparison of approaches to the radical Islam and the integration of Muslims in selected EU member states. Prague, 2016. 74 p. Master thesis (MA) Charles University, Faculty of Social Sciences, Institute of Political Studies. Department of International Relations. Thesis supervisor Mgr. Tomáš Kučera, Ph.D.

Abstract

The thesis offers a comparison of integration of Muslims and approaches toward radical Islam in three countries: Germany, France, and Sweden. These three countries used to represent three main integration types. The thesis argue that these three types do not longer exist and tries to verify convergence hypothesis. This is done by the analysis of particular selected aspects of integration of Muslims and counter-radicalization and counter-terrorism measures related to radical Islam in every examined country. The thesis further evaluates the effectiveness of integration and counter-radicalization approaches in selected countries and indicates which country appears to be the most effective based on selected criteria. Based on the analysis of individual countries, the thesis assumes which integration and counter-radicalization approaches or their combination toward Muslims might be the most effective.

Keywords

The integration of Muslims, counter-terrorism and counter-radicalization measures against radical Islam, the relation between the state and Islam, Germany, France, Sweden, comparison

Range of thesis: 149 457 characters

Bibliografický záznam

RAFFAJ, Ivan. Porovnanie prístupov k radikálnemu islamu a integrácii moslimov vo vybraných členských štátoch EÚ. Praha, 2016. 74 s. Diplomová práca (Mgr.) Univerzita Karlova, Fakulta sociálnych vied, Institut politologických študií. Katedra medzinárodných vzťahov. Vedúci diplomovej práce Mgr. Tomáš Kučera, Ph.D.

Abstrakt

Táto diplomová práca ponúka porovnanie integrácie moslimov a prístupov k radikálnemu islamu v troch krajinách: Nemecku, Francúzsku a Švédsku. Tieto tri krajiny v minulosti reprezentovali tri hlavné prístupy k integrácii. Diplomová práca tvrdí, že tieto tri typy integrácie už existujú a snaží sa overiť hypotézu konverencie. To uskutočňuje pomocou analýzy vybraných aspektov integrácie moslimov a proti radikalizačných a protiteroristických opatrení vzťahujúcich sa k radikálnemu islamu v každej skúmanej krajine. Práca ďalej hodnotí efektívnosť integrácie a boja proti radikalizačným prístupom vo vybraných krajinách a ukazuje opatrenia, ktorej krajiny sa zdajú byť najúčinnnejšie. Hodnotenie efektivity je prevedené na základe zvolených kritérií. Na základe analýzy jednotlivých krajín sa predpokladá, ktorý prístup alebo kombinácia prístupov by mohla byť najúčinnnejšia v boji proti radikalizácii moslimov a v efektívnom integrovaní do spoločnosti.

Kľúčové slová

Integrácia moslimov, protiteroristické a proti radikalizačné opatrenia voči radikálnemu islamu, vzťah medzi štátom a islamom, Nemecko, Francúzsko, Švédsko, porovnanie

Rozsah práce: 149 457 znakov

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4. I agree that this work might be published for research and study purposes

In Prague, May 13, 2016

Signature: Ivan Raffaj

Acknowledgments:

I would like to thank my supervisor Mgr. Tomáš Kučera, Ph.D. for his time, patience and useful insights and comments.

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Introduction

Muslims have become a permanent part of Western European societies and their integration is crucial for further successful coexistence of Muslim immigrants and natives. Hence, integration of Muslims and incorporation of Islam into the European societies has become one of the most important challenges related to integration and immigration in Europe. The European states have to face two main challenges connected with Islam: integration of Muslims into the majority society and countering the radical Islam and radicalization among the Muslims within European societies.

Despite of the particular common framework provided by various international and mainly the European organizations (especially the EU), the EU states assert different integration approaches and their counter-terrorism measures vary as well. The literature identifies three main integration types: multicultural, assimilative, and segregative which is not integration type in its nature. We have selected three EU countries which the best represent these types and analysed certain aspects of their integration policy, relations between state and Islam, and counter-radicalization and counter-terrorism measures. The first multicultural type is represented by Sweden. Multicultural type is characterized by its openness and promotion of individual and group rights to self-identification. The opposite of multiculturalism is assimilative integration type which is characterized by the promotion of the universalist values and do not admit individual rights to specific groups, including immigrants. Ideally, different cultures should be fully incorporated into the majority society and accept its values. France is the prominent example of this approach and it is used in this thesis. The last type is segregation which is not integration type in its true sense. The main aim of this type is not integration of immigrants but their exclusion. Immigrants are understood as foreign element and are supposed to reside in the country only for a limited period of time. This type is represented by Germany.

This thesis discusses individual cases in the framework of certain aspects of integration and counter-terrorism measures with an emphasis on integration of Muslims. These aspects are: legal framework (citizenship and residence permit), counter-terrorism and counter-radicalization measures, and relation between state and Islam. The analysis of the cases is performed with an emphasis on these aspects of integration and counter-radicalization. This assessment is accompanied with an assessment of factors which indicates the effectiveness of overall integration, namely number of terrorist attacks

inspired by radical Islam, number of foreign fighters, number of terrorist attacks against Muslims, and perception of Muslims (support of anti-Islam parties, polls) in examined countries.

The thesis will answer the following questions: Which country is the most effective and which is the least effective in integration of Muslims and countering radical Islam? Is there any difference in effectiveness at all? Have integration types changed? How can we define new integration types?

Two last questions are closely connected to a convergence hypothesis. The convergence hypothesis claims that integration types as we previously understood them do not longer exists. For example, segregation type has ceased to exist because all EU countries acknowledged that immigration is permanent and Muslims have become integral part of European societies. This master thesis tries to prove the convergence hypothesis. The first two questions are focused on the effectiveness of integration and counter-radicalization and indicate which country appears to be the most effective based on selected criteria. Therefore it indicates which integration type, assimilation or multiculturalism or their combination, might be the most effective toward integration of Muslims and countering radical Islam.

First chapter of this thesis sets a theoretical framework. The theoretical concepts and typology of integration which are used in following chapters are introduced. The chapter also identifies the main method of this thesis: comparison, introduces methodology, further clarifies a selection of cases, and highlights limitation of the thesis. Second chapter offers the analysis of individual cases: Germany, France, and Sweden. The analysis is based on selected criteria: legal framework (acquisition of citizenship and residence permit by foreigners), counter-terrorism and counter-radicalization measures, and relation between state and Islam. The chapter also includes assessment of factors which indicates the level of effectiveness of integration and counter-terrorism and counter-radicalization measures (number of terrorist attacks motivated by radical Islam, number of foreign fighters, support of anti-Islam parties and etc.). Third chapter offers a comprehensive comparison of all selected countries and conclude which country appears to be the best performing and which type of integration policies dominates in this country and all other countries as well. The chapter also provides a confirmation/ negation of the convergence hypothesis. It is assumed which type of integration policy is the most efficient (multiculturalism, assimilation or

combination of both approaches). This assumption is based on the examined countries in this thesis and their identified allegiance to individual approaches.

The master thesis is limited by the lack of data based on affiliation to religion in European countries. There are basically no data which would only involve certain religious groups, in our case Muslims. The population of Muslims in various European countries is also only an estimate. None of the examined countries collects data about unemployment rate divided by the affiliation to religion (which would be a very efficient way how to measure integration of Muslims). Only available statistics are based on the division foreign-born/native-born. However these cannot be used in our analysis.

The master thesis does not strive to clarify causal relations between governments' policies toward integration of Muslims and countering radical Islam. Its main aim is the analysis of three cases and their following comparison. The contribution of the thesis is in evaluation of effectiveness of these policies and identification of new typology of integration which would better describe current integration types represented by Germany, France, and Sweden.

1. Theoretical framework

First of all, we have to clarify the theoretical framework and theoretical concepts which are used in this master thesis. Incorporation of Muslims into the European countries is closely related to cultural integration into the European societies. If we want to understand the immigration and the following integration of Muslims, we have to study the concepts of culture and nation itself. We may not be the advocates of Samuel Huntington's thesis that *"the central and most dangerous of the emerging global politics would be conflict between groups from differing civilizations"*¹ (Huntington, 1996, p. 13) but we have to admit that the allegiance to the specific culture is an important factor which influences the functioning of the heterogeneous society formed by the different ethnicities or religions. The integration policies have to cope with tensions within the society that are caused by its heterogeneity. These integration policies should focus on the all aspects which are crucial for a full integration of immigrants into a hosting society. If we want to understand how states in Europe cope with these challenges, we need to clarify the concept of nation state that has been formed since 1648. Pavel Barša uses the term *"liberal nation state"* which combines *"principles of the territorial sovereignty and human rights."* (Barša, Baršová, 2005, p. 19) This understanding of the state in Europe² has a paradoxical nature. The concept has *"...begun with a universalist assumption of basic human rights which belong to every person and end up with a particular notion of unique nation."* (Barša, Baršová, 2005, p. 19) Nowadays, the concept of nation state (Barša calls it a *"liberal democratic nation state"*) refers to the state which is based on the certain values (e.g. democracy, pluralism, human rights, and so on) and it includes both, *"the individualistic universalism of liberalism and libertarianism and the collectivist particularism of the realism and communitarianism."* (Barša, Baršová, 2005, p. 25) The debate between the universalism and particularism is forming a debate about the migration itself. This concept of nation state is widely spread all over the Europe and the regions influenced by the European political thinking. However, we might argue that the different outcomes of the dispute between universalism and particularism caused slightly different understanding of nation state³ in various European countries.

¹Postulated in the summer of 1993 in Samuel Huntington's article The Clash of Civilizations the journal Foreign Affairs.

²This understanding of the state is mostly present in Western Europe and North America.

³ With respect to all its liberal, democratic, and national traditions.

1.1 Between assimilation and pluralism – integration types

The different understanding of nation state raises different approaches toward migration and integration of minorities into the hosting countries' societies. Based on this assumption we can identify two basic integration models. The first one is the assimilation model which does not admit any specific rights to ethnic or religious minorities. The main goal of this approach is to assimilate all the incoming immigrants and minorities within the society and create a homogenous society. It means that all immigrants are supposed to accept the culture, language, and history of the hosting nation state. There is no specific group identity, only the dominant one. All minor identities should have only private character and they should vanish in the public space. The second model has a pluralist nature. It tolerates public appearance of identities of minorities and immigrants. It also takes into the consideration specific needs of minorities and immigrants⁴. Nevertheless, it expects the integration into the hosting society and acceptance of majority's culture. (Barša, 1999, p. 10-11) We have to take into consideration that these two models are just two poles of the axis and integration policies of the states are usually a mixture of these two approaches but most of time one of them prevails and it is more dominant in forming of integration policy of the state. Barša also identifies the third model, the contemporary differentiated incorporation⁵ which was until very recently present in Germany. This model is not integrating in its nature but segregating which originates in belief that all immigrants are in Germany only temporary. (Barša, 1999, p. 11) We did not include this model into the previous typology because it is not integration model in its nature. However, it highlights the differences between native population and immigrants. Its primary goal is not the integration of upcoming immigrants into the hosting society but their segregation. This model understands immigrants as foreign and only temporary component in the society, not its permanent and indivisible part. Nonetheless, this has changed in recent years and integration policies have started to acknowledge that immigrants might become a permanent part of the society. This applies for German case as well. (Bruce, 2012, p. 23)

⁴ E.g. Specific education, group political rights, representation in the public space and so on.

⁵ It can be also called segregation model.

1.2 Multiculturalism in contrast with assimilation

The concept of multiculturalism is closely connected to integration and can be understood as an outcome of pluralist integration model, but at the same time it can be seen as a failure of the assimilation model. According to the previously mentioned debate between universalism and particularism, multiculturalism can be understood at the same as positive and negative aspect of integration and migration. The critics of multiculturalism argue that the “*multiculturalism itself is one of the reasons of dissolution of liberal democratic ideals*” (Barša, 1999, p. 15). On the other hand, the advocates of the multiculturalism argue that the “*multiculturalism is an answer to a real problem of coexisting in a culturally heterogonous environment.*” (Barša, 1999, p. 15) Hence, it is complicated to identify multiculturalism solely as an outcome of the particular integration policies or as a reason why specific policies have been applied. In the framework of this master thesis we discuss it from both perspectives.

Another interesting perspective of multiculturalism is its “*conservative understanding and agendas which might often directly lead to the assimilationism.*” (Bhabha, 1998, p. 44) As we mentioned previously, multiculturalism and assimilationism are usually viewed as two opposite approaches when it comes to integration of immigrants. This is the case when the common identity and certain extent of individualism is demanded, so all the minorities would be able to possess their individual rights and preserve their specifics. All these thoughts fall within the pluralist (democratic) integration theory (Bhabha, 1998, p. 44) and they are logically supposed to lead to multicultural society; but at the same time they create the framework enable a certain level of assimilation which is needed to sustain the multicultural society. This example shows us that the concepts of multiculturalism and assimilationism in the integration theories are not delimited so strictly and they might even merge together to some extent.

1.3 Concept of naturalization and typology of nations

The concept of naturalization is also crucial if we want to understand how immigrants are treated in the host counties. We may observe two tendencies which are independent from the previously mentioned models and are based on level of assimilation. To demonstrate this two tendencies (or models) we are using the typology of national identities provided by Barša and Baršová. They differentiate between four types of national identity which are based on two contradictions. The first one is controversy

between the nation of immigrants and the nation of natives. The second one lies between ethnic and civic nations. The ethnic nation is based on exclusivity of ethnicity and blood connection (e.g. Germany, or most of the new member of the EU⁶). On the other hand, the second one is formed by its citizen and does not take into the consideration their ethnicity, religion, and country of origin (e.g. France, countries with the Anglo-Saxon traditions). (Baršová, Barša, 2005, p. 31)

	Nation of immigrants	Nation of natives
Civic nation	USA ⁷ , Canada, Australia	France, Great Britain
Ethnic nation	Israel	Germany

Source: Baršová, Barša: Přistěhovalectví a liberální stát, 2005, p. 31

These four types are, of course, the ideal types which provide a framework to study the empirics. They also refer to how difficult is to become a permanent member of society with all rights and duties – in other words, how difficult is to become a citizen of a state. The nation state and its understanding is also related to immigration and integration type. Civic understanding of the nation caused that the UK (the same applies for France) allowed immigration from its former colonies because immigration was mostly demarcated by the political boundaries. On the other hand, Germany's policies were influenced by its cultural boundaries and different understanding of nation state. That is one of the reasons why Germany supported workers who were supposed to be in Germany only for a certain period of time. (Joppke, 1999, p. 261)

Previously mentioned typology provides us with a better understanding of specific historical development in various countries and highlights their cultural differences, understanding of their own identity and therefore helps us to comprehend the variations in their integration and immigration policies. However, the integration policies are converging and national specifics and variations are gradually disappearing. This process is usually called a convergence or a convergence hypothesis. It claims the similarities between countries which are accepting immigrants. These trends manifest themselves in terms of ...”

- (1) the policies that their government have adopted to control immigration, (2) policies designed to integrate immigrants into host*

⁶ The states which entered the EU after 2004.

⁷ Huntington identifies the USA as a nation of natives in his book “Who we are” (2004). He argues that the USA were formed by homogenous groups who settled in the contemporary USA in 17th and 18th century. Nowadays, the US nation is formed by descendants of these “immigrants”.

societies by providing them with social services as well political, economic, and social rights, and (3) attitudes toward immigrants and immigration policy preferences among general publics.”(Cornelis, Tsuda, 2004, p. 4)

This convergence process undermines the national specifics and somehow unifies the integration and immigration policies. It also diminishes an importance of historical development in different countries. Immigration and integration policies were formed by the national specifics until the end of the 20th century. Nonetheless, we are able to observe the convergence since 1990s. In that period, many countries in the Western Europe identified themselves as immigration countries and that was a significant shift from previously advocated positions.⁸ Barša identifies the reasons why the convergence took place. The main reason is that integration was newly understood as an agreement between an immigrant and a hosting country. The immigrant should accept the language, political institutions, and liberal democracy of hosting country. The country should also accept immigrant’s traditions, culture, and religion but only if the person accepts the liberal democratic principle and his own conviction is not against these principles. (Barša, Baršová, 2005, p. 164) If we simplify it, we may argue that convergence process (hypothesis) was an inevitable reaction to similar problems related to the immigration and integration of immigrants.

If we want to understand immigration and integration policies we have to take into the consideration that migration itself is a process which is difficult to control to the full extent by governments of receiving states. Some studies argue that nation states are able to considerably control the immigration into their countries⁹ but there are many authors who argue otherwise. Nonetheless, Cornelius and Tsuda argue that many countries experienced significant immigration control problems in recent years. The same applies to integration policies which are showing the growing gap between intended policy objectives and their real implementation in practise. (Cornelis, Tsuda, 2004, p. 5) Countries have to adjust their integration approach toward Muslims because they are not always able to set boundaries and define themselves freely as immigration country

⁸ This is evident in the most of the nation states but mostly in countries like Germany which formerly understood themselves as nation states based on their unique ethnicity.

⁹ See for example Freeman, 1994, 1995, 1998.

or country of natives. Therefore, the shift between the nation types (civic nation, ethnic nation) and integration types might be forced by external effects.

1.4 European influence

One might argue that the convergence hypothesis in the EU's context partially overlaps with the concept of "Europeanization" but it is only partially true. In this master thesis the process of Europeanization is understood as part of the convergence process, even though the Europeanization does not represent the convergence process as a whole. The Europeanization can be defined as a process in which the EU member states converge their policies in many areas. Radaelli defines Europeanization as a process involving construction, diffusion, and institutionalisation of formal and informal rules, procedures, policy paradigms, etc. However, he also includes shared beliefs and norms which have been firstly defined and consolidated on the EU level and then incorporated within the national and subnational discourse, political structures, institutions, and public choices. (Cini, 2007, p. 407) Nevertheless, as Barša points out, the Europeanization played only a limited role in the convergence of integration and immigration policies in the EU. For example, the UK is not fully involved in the Common European Asylum System (CEAS) and therefore the impact of the EU is limited and the UK policy in this matters cannot be considered fully influenced by the Europeanization. (Barša, Baršová, 2005, p. 164)

Probably the most important milestone in the history of EU, related to the issue of migration, is incorporation of Schengen acquis into the framework of the EU, and abolition of controls at common borders in the Treaty of Amsterdam.¹⁰The Treaty of Amsterdam also obliged the Council to adopt certain measures related to immigration, e.g. conditions of entry and residence, and standards on procedures for the issue by Member States of long term visas and residence permits, illegal immigration and illegal residence, measures defining the rights and conditions under which nationals of third countries who are legally resident in a Member State may reside in other Member States. (Treaty of Amsterdam, Article 73k, 1997, p. 29) The same might be said about the counter-terrorism measures at the EU (e.g. cooperation in Europol) or the CoE (Council of Europe Convention on the Prevention of Terrorism). The convergence has

¹⁰ Schengen acquis existed before its incorporation into the EU framework by the Treaty of Amsterdam.

also a global dimension, e.g. the UN level (Refugee convention) which significantly influenced migration.

1.5 Challenges related to Islam and radical Islam in the West

If we want to understand the integration of Muslim in Western societies, we have to take into consideration the perception of Muslims by these hosting societies. We might face two major challenges when we are talking about the problems related to Muslims within the Western societies. These challenges are: how to successfully integrate and incorporate Muslims into the Western society and how to cope with the radicalization of part of Muslims within the hosting country. Barša described these challenges in broader context. He points out the role of Islam as a religion and the role of Islamism as a political ideology. This difference inevitably leads to distinction between European approaches to Islamism and Islam which are understood as two different concepts. (Barša, Baršová, 2005, p. 182)

The first challenge, the successful integration of Muslims and their incorporation into a majority society, is a matter of the integration and immigration policies which are enforced by the governments of the hosting countries. These policies include all immigrants, not only Muslims¹¹. One of the reasons why Muslims are studied as a special group is their relation with the hosting societies. (Western) European Muslims have become very visible and also numerous part of the Western European societies. According to Pew Research Centre, there is more 44 millions of Muslims in Europe. Nevertheless, this estimation includes also Muslim population in Southeast Europe which is misleading because this population may be branded as the native one (these Muslims are not recent immigrants). The estimated number of Muslims in Western and Northern Europe is 15 million. (Pew Research Centre's Forum on Religion and Public Life, 2011) Other estimation reports about 16 – 17 million Muslims in Western and Northern Europe combined in 2010. (Laurence, 2012, p. 1) Despite these relatively high numbers, Muslims represent only around 7,5 % of population in France which is the biggest share of Muslims population among all Western European countries. Despite of this relatively low proportion, the European Muslims are visible in public. The European government allowed and encouraged an establishment of national forms of

¹¹ Nonetheless, special regimes might be applied for foreigners from the various countries. E.g. the nationals of EU member states falls under the different regime in all other EU member states.

Islam. In this spirit, various Islam Councils have been established in many Western European countries.

The second challenge is the radicalization of Muslims who reside in the European states and Islamism as a form of radical Islam. The topic has recently gained an importance because of foreign fighters, coming from the EU countries, are now fighting as jihadists in Iraq and Syria. This challenge is connected to both, successful integration into the society and counter-terrorist measures. However, the issue of radical Islam and Islamist terrorism has drawn attention after the 9/11 terror attacks following interventions of Western allies in Muslim world. In this context, many Western governments passed additional counter-terrorist laws and marked radical Islam and Islamist terrorist attacks as a major threats to their security. In some case, the arrival and settlement of Muslims created hostility and segregation of these Muslims and it represent a threat to national security. The threat to security is often poses by the second and third generations of Muslims immigrants who are caught between their two identities, Muslim and Western. (Leiken, 2012, p. 266) At this point the integration of these specific individuals failed and government have to cope with another challenge: radical Islam which demonstrates itself in form of terrorist attacks and newly in form of foreign fighters.

1.6 Methodology

The aim of this master thesis is to assess integration of Muslims and counter radicalization policies in three EU member states: Germany, Sweden, and France. The master thesis strives to offer a comparison of these policies and evaluates their effectiveness. It omits the integration strategies on the EU level because as we stated previously it is a common framework for all the EU member states. Despite of this fact we assess if the legislation (especially in case of residence permits) go beyond the common EU norms. We do not have to take into the consideration the exceptions which allow certain member states not to elaborate in integration and migration matters because all countries, studied in this master thesis, are part of all treaties and agreements on the EU level in this matter.¹² We also do not assess immigration policies, the thesis only offers an assessment of particular aspects which are part of the immigration policies (residence permits) but those aspects are also very closely connected to integration into the society.

¹²E.g. the UK or Denmark possess exception in areas of our interest but we do not study these countries.

The main research method used in this thesis is a comparison. The comparison is performed on three cases which represent basic integration types as they are defined in the first chapter. The thesis offers an analysis of three cases based on the selected factors which significantly influence integration and counter-radicalization of Muslims. The comparative method was performed as it is defined by Lipjart: the analysis of small number of cases which does not allow the use of conventional statistical analysis. (Collier, 1993, p. 106)

In the first part of this thesis, we analysed both governments' measures and evaluate how successful these measures are on various indicators which refers to the level of effectiveness of integration and counter-radicalization. The following governments' measures (inputs) were analysed:

1. Legal framework: assesses how foreign citizens may acquire the citizenship of hosting country and what are the requirements to obtain residence permit. Legal framework indicates how difficult is to become a member of a society who is enjoying all rights (citizenship). In addition, residence permit assesses how states are willing to grant a permanent residence. The evaluation of residence permit is added because it influences not only the immigration of new immigrants but it also shows how difficult is to obtain permanent residence. This indicates the willingness of state to permanently incorporate and integrate former immigrants into society.

2. Counter-terrorism legislation and measures: assesses the counter-terrorism measures in selected countries. It shows which policies were promoted. However, counter-terrorism includes all types of terrorism (separatist, Islamist, radical right, radical left, and others) and that is why we identified particular measures on which we can demonstrate Islamist related counter-terrorism. These measures include approaches toward travelling abroad to commit terrorist attacks or receive training with an intension to commit them in the future. ¹³

3. Relation between state and Islam: assesses relations between a state and Islam. How they were institutionalized and which approach has been used (assimilative or multicultural). It evaluates the legislation which has been passed to cope with the presence of Islam in the country. To illustrate this legislation we take a closer look at the laws concerning wearing of veil.

¹³The legislation related to these types of terrorist acts is not directly focused on Islamist terrorists but it is obvious that Islamist foreign fighters coming from Western European countries and fighting in Syria and Iraq were the main reason to adopt this type of laws.

Governments' measures are mostly normative but they certainly have an impact on effectiveness of integration and counter – radicalization which have a positive nature (however other factors influence the final outcomes – effectiveness, e.g. foreign policy of state – case of France)

The effectiveness of combating radical Islam and integration of Muslims into the society. This effectiveness is measured by the number of the Islamist terrorist attacks, number of foreign fighters (it measures a level of radicalization, the comprehensive data about number of potentially dangerous radical Muslims are not available) currently fighting in Syria and Iraq, perceptions of Muslims by native citizens (measured by survey researching how natives view Muslims, number of terror attacks against Muslims¹⁴ and number of votes for parties¹⁵ with anti-Islam rhetoric (the results of these parties were heavily influenced by current migration crisis).

After the evaluation of individual cases, the comparison will be performed. The thesis main objective is to assess the effectiveness of integration of Muslims and combating radical Islam. These are the main research questions: **1.** which country is the most effective and which is the least effective in integration of Muslims and countering radical Islam? **2.** Is there any difference in effectiveness at all?

Thesis also reviews the validity of convergence hypothesis. As Cornelius and Tsuda pointed out, there is growing convergence between immigration and integration policies all around the globe. The convergence is even stronger on a regional level, specifically on the EU level. (Cornelius, Tsuda, 2004, p. 16 – 17) This thesis suggests that convergence has become a reality in recent years in the EU countries. The thesis strives to confirm this hypothesis by the means of comparative analysis which should allow us to observe possible convergence in the integration and counter-terrorism policies. If the convergence hypothesis is proven to be correct, it means that current integration types are merging together. It does not have to inevitably mean non-existence of integration types but it might indicate that current typology needs to be re-evaluate.

The master thesis also has its limitations. The most significant problem is a collection of relevant data. Almost all statistics include comprehensive data about all immigrants. There are various reasons¹⁶ why religion is not included in statistics about

¹⁴ Of course, this indicator could also measure the effectiveness of counter-terrorism measures but it was used to illustrate the extent of the most severe violence (terrorist attacks) against Muslims.

¹⁵ Alternative für Deutschland, Front National, and Sverigedemokraterna (Swedish Democrats)

¹⁶ In general, it is not appropriate to collect data based on religion in the EU.

unemployment¹⁷, number of political representatives, and others. In addition, even existing data about Muslims are more or less based on estimations – Muslim population, foreign fighters and others. Therefore, the thesis is inevitable imperfect.

1.7 Selection of cases

Three studied cases were not selected randomly. Every selected state represent one type of integration. We mentioned three basic types of integration in Europe. However, these types are ideal types and they do not occur in practise in this ideal form. They might overlap and be located anywhere on the axis from ideal assimilative model to ideal multicultural type of integration. France represents the most assimilate country in the EU and hence it is the most similar to clear assimilative type. The multiculturalism as an opposite type is represented by Sweden. The third type which is not located in the axis pluralism (multiculturalism) – universalism (assimilation) is incorporation (segregation) which is represented by Germany. (See H. Entzinger, R. Biezeveld, *Benchmarking in Immigration Integration*, 2003 or A. Baršová, P. Barša, *Přistěhovalectví a liberální stát*, 2005) However, these traditional approaches do not longer exist in their previous forms. (See Carrera, *A Comparison of Integration Programmes in the EU: Trends and Weaknesses*, 2006)

¹⁷ Only statistics based on citizenship are available.

2. Analysis of individual cases

In this chapter we are assessing the integration of Muslims and approaches toward radical Islam in three countries: Germany, Sweden, and France from year 2002 until the spring 2016 (publication of this thesis). Studied period starts in 2002 because an understanding of radical Islam and perception of Islam and Muslims in general has changed as a result of the modified security environment after the terrorist attacks in 2001. The period of our interest also incorporates a migration crisis in Europe. The migration crisis is definitely forming an attitude toward Muslims and radical Islam but the main aim of this thesis is an assessment of integration of Muslims and approaches toward radical Islam.

2.1 Case: Germany

As we mentioned in the first chapter, Germany was often used as an example of segregation integration model. The total population of Muslims in Germany is roughly 4 119 000. It accounts represents 5% of entire German population. (Pew Research Centre's Forum on Religion and Public Life, 2011) The extensive migration of Muslim to Germany started in the mid-1960s. In this period, Federal Republic of Germany signed the agreements with numerous countries about the recruitment of so called "Gastarbeiters" (guest workers). These agreements were also signed with three countries where the majority of population adheres to Islam - Turkey, Morocco, and Tunisia, and one with a significant Muslim minority - former Yugoslavia. These foreign workers were originally supposed to reside and work in Germany only temporary. (Curlle, in Local integration policies for migrants in Europe, Borkert and col., 2007, p. 15) This myth of temporary migration was elaborated by Stephen Castles and it referred to the belief of part of the politicians, public officials, scholars, and general public that once Gastarbeiters would return to their country of origin as they were not permanent residents of Germany. (Castles, 1992, 549) The myth was present in German society until the late 1980s. Nevertheless, some German politician used the phrase "Germany is not a country of immigration" ("Deutschland ist kein Zuwanderungsland") during the 1990s as well. The myth was finally abandoned in 2000 with the reform of the citizenship law. This was a long lasting process in which the fact that the migration to Germany is permanent was accepted by the society and decision makers. (Bruce, 2012, p. 23)

According to previously mentioned, Germany was clearly an example of a contemporary differentiated incorporation type of integration. Nowadays, the situation in Germany has changed dramatically. Germany has clearly become a country of immigration (Zuwanderungsland). German portal called “Make it in Germany”¹⁸ is promoting Germany as the country of immigration and states that around 11 million people currently living in Germany were born in foreign countries. In conclusion, Germany experienced a shift from segregative model in which the immigration was only understood as temporary and integration was not needed.

2.1.1 Citizenship

As we mentioned, the most important changes in German citizenship law were introduced in 2000 because of the amendment of Nationality Act (Staatsangehörigkeitsgesetz, 2000). Before this Act entered into force, Germany practiced *ius sanguinis*.¹⁹ Other important changes related to immigration and integration of immigrants were made in 2005 and 2007. In 2005, the Immigration Act (Zuwanderungsgesetz, 2005) entered into force and its further provisions followed in 2007. Since 2000, children born to parents who are not German citizens can automatically acquire German citizenship if at least one parent is legal resident in Germany for at least eight years. Upon turning twenty-one, the person who acquired German citizenship this way is obliged to choose between his/her German nationality or the nationality of his/her parents. The second Act amending the Nationality Act entered into force in 2014. According to this amendment, citizens who possess only a nationality of another EU member state or Switzerland are not obliged to choose between two citizenships. Also person who has been habitually resident in Germany for at least eight years or attended school in Germany for at least six years, or completed their schooling or vocational training in Germany, are not required to decide for only one citizenship.

Non-Germans have the right to acquire German citizenship after the period of eight years of legal residence in Germany. Other conditions have to be met as well: adepts for naturalization have to prove their knowledge of German language, commitment to Grundgesetz (Constitution), have clean criminal record, and ability to support himself/herself financially. German authorities also expect the person who acquires the

¹⁸The webpage is officially supported by the federal government’s institutions.

¹⁹ The citizenship was given to anybody of German descent but not to foreigners born in Germany.

German citizenship to give up their former nationality. Nevertheless, there are exceptions to this rule: other EU member states' nationals and Swiss citizens, elderly persons, people who are politically persecuted or persons who cannot legally renounce their previous citizenship are not obliged to do so and are able keep a multiple citizenships. (Staatsangehörigkeitsgesetz, 2000; Zuwanderungsgesetz, 2005, www.auswaertiges-amt.de, 2015)

In general, this new citizenship law and different attitudes toward naturalization led to the shift in German understanding of citizenship and it might lead to more coherent and universalist integration which is not dominated by ethnicity. (Effectiveness of National Integration Strategies Towards Second Generation Migrant Youth in a Comparative European Perspective – EFFNATIS, 2001, p. 31) The process of acquiring citizenship has changed and it indicates that Germany cannot be anymore classified as country with segregative approach to integration and immigration. However, German citizenship acquisition remains rather restrictive. On the hand new legislation introduced *ius soli* principle. At the same time, children (born to foreigner in Germany) who acquired German citizenship, must declare between the age of 18 and 23 whether they want to retain the German nationality. (Hailbronner, 2012, p. 29)

2.1.2 Residence permit

There are four types of residence permit in Germany. Namely, the residence permit (temporary residence title), EU Blue Card²⁰ (temporary residence title), the settlement permit (permanent residence title), and the EU permit for permanent residence (permanent residence title).²¹ Nevertheless, these resident permits do not apply to the nationals of one of the Member States of the EU, the EEA or Switzerland. We are not going to discuss the EU permit for permanent residence and EU Blue Card because all of these are the same for all three countries which are included in this thesis and hence are irrelevant for the comparison. To acquire a permanent residence permit, person has to fulfil following criteria: 1. hold a (temporary) residence permit for five years, 2. his

²⁰ The EU Blue Card is applicable in 25 EU member states (exceptions: Denmark, UK, and Ireland). It provides a right to work and reside in the EU (25 states) for the national of third countries. It is applicable for highly qualified workers (e.g. university degree, an employment contract or a binding job offer with a high salary compared to the average in the EU country where the job is). (EU Migration Portal, 2015, http://ec.europa.eu/immigration/who-does-what/what-does-the-eu-do/coming-to-the-eu_en)

²¹ We are only taking into the consideration a long term stay, we do not focus on the stays shorter than 90 days which do not grant working or studying permits. Hence, the aim of the stay is not employment or self-employment in Germany or school and university education.

or her subsistence is secure, 3. paid compulsory or voluntary contributions into the statutory pension scheme for at least 60 month, 4. the granting of a permanent residence is not precluded by reasons of public safety and security, 5. person is permitted to be employed or is employed, 6. person possesses the other permits which might be required, 7. sufficient command of German language, 8. basic knowledge of society, legal system, and local habits in Germany, 9. possession of sufficient living space for himself/herself. (Aufenthaltsgesetz, last amended in 2013, section 9) The Residence Act (Aufenthaltsgesetz) also imposes reasons which might lead to granting a temporary residence title. It states educational purposes (it includes school education and various courses, e.g. language course), other educational purposes (e.g. trainings in companies), residence for the purpose of economic activity (employment in general, and employment of qualified workers), settlement permit for graduates of German universities and comparable educational institutions. There are also special sections about skilled and qualified workers and highly qualified foreigners to seek an employment in Germany which yet do not guarantee a permit to pursue an economic activity automatically. (Aufenthaltsgesetz, last amended in 2013)

2.1.3 Counter-terrorism measures and radical Islam

According to German Federal Ministry of Interior, the Islamism and terrorist acts related to Islamism represent the greatest threat to the security of the Federal Republic of Germany and it will remain one of the major threats in the foreseeable future. Islamism is understood as a threat especially after the 09/11 terrorist attack. Germany has responded to these challenges by legislative, organizational, and social policy measures. German counter-terrorism policy is defined by the Federal Government's comprehensive strategy to fight Islamist terrorism. (Federal Ministry of Interior Webpage, 2016)

Annual report on the protection of the Constitution (Grundgesetz) provides a basic data related to extremism, terrorism, and politically motivated crimes in general. There are also special section devoted to Islamism and the Islamist terrorism. According to 2014 Annual report on the protection of the Constitution²², Islamism and many Islamist organization are currently present in Europe and Germany itself and it acknowledges an

²² The report 2015 Annual report on the protection of the Constitution is not available yet.

importance of rise of IS (Islamic State)²³. The report also identifies the consequences of this rise of IS in power. The rise of IS caused a euphoria among the jihadists all around the world, including EU and Germany as well. It has resulted in a constantly increasing number of individuals travelling to conflict areas to support IS. (Annual report on the protection of the Constitution, 2014, p. 21)The International Centre for the Study of Radicalisation and Political Violence (ICSR) estimates that around 20 000 foreign fighters²⁴. Approximately 20% of foreign fighters originate in fourteen Western European countries. It is estimated that 500 – 600 foreign fighters are coming from Germany. It is also important to note number of foreign fighters per capita. In this case Germany scores 7,5 foreign fighters per million population.²⁵ (Neuman, 2015) It is also important to take into the consideration the percentage of foreign fighters from the Muslim population in Germany. In 2010, approximately 4 760 000 Muslims resided in Germany. (Pew Templeton Global Religious Futures Project, 2011) Hence, there are approximately 115,5 foreign fighters per one million Muslims in Germany. According to German Federal Ministry of Interior, the number of foreign fighters from Germany fighting in IS and other organizations abroad has risen up to 700 in June 2015. (Gesley, 2015, p. 1) Nonetheless, we will take into the consideration the estimates made by the ICSR because they have the comprehensive data for all countries included in this thesis. Before terror attacks on 9/11, counter-terrorism legislation was mostly restricted to criminal law. Since these events, counter-terrorism legislation has been presented in various legal branches. As a consequence, many provisions adopted in the context of counter-terrorism affect not solely terrorist suspects or convicts, but the population as a whole. Among others, this includes the legislation related to Federal Office of Criminal Investigations and three German secret service agencies (Federal Intelligence Service, Military Counterintelligence Service, and Federal Constitution Protection), ID and Passport regulations, Communication, Insurance Supervision, aviation, and Foreigner's law. (Oehmichen, 2010) One of the most important pieces of legislation is Terrorismusbekämpfungsgesetzes (Counter-terrorism Act) from 2002 (for the last time amended in 2007). It was passed as a reaction to the 9/11 attacks and it contains various

²³ Islamic State (IS) is also often being referred as Islamic State of Iraq and the Levant (ISIL), Islamic State of Iraq and Syria or Islamic State of Iraq and al-Sham (ISIS), Daish, and Daesh. Other names might occur as well in literature.

²⁴The foreign fighters are foreigner who joined the Sunni militant organization in conflict in Syria and Iraq.

²⁵ All figures are based on data from the second half of 2014. Figure from Western European countries nearly double since December 2013. (Neuman, 2015)

amendments to federal laws. Most importantly, the powers of the secret services have been expanded, the fundamental right to the post's and telecommunication's secrecy were further restricted (including all information on the use of telecommunication services and location of mobile phones). Moreover, identity documents with biometric features were introduced, changes in aviation law has been made (including information about the air transfer), and the rules of immigration law were passed. Nonetheless, all information is only available after the consent to use this information which has to be given by the G-10 Commission (it assesses the legitimacy of accessing of these information). (Terrorismusbekämpfungsgesetzes, 2002, Artikel 1)

Other counter-terrorist measures were introduced in 2014. It was meant as a reaction to previously mentioned rise of IS and to increasing number of foreign fighters from Germany. Specifically, German legislation allowed the authorities to revoke or refuse to issue a national identity card for IS supporters. It also banned IS itself, their activities, and all activities supporting IS in Germany. (Gesley, 2015, p. 1) Nonetheless, the ban of IS cannot be considered as a change in German counter-terrorism and radicalization policies. IS was simply a new phenomenon but measures which were taken had been known from the past and were used in case of different terrorist (not exclusively Islamist) organizations. However, there were changes which reshaped German anti-terrorist legislation. The German Criminal Code (passed in 1998) defined preparation of a serious violent offence endangering the state which included instructing another person or receiving terrorist training in order to execute these serious violent crimes (in our case, terrorist attacks motivated by Islamism). (German Criminal Code, 2010, Section 89a)

“The new legislation goes one step further and makes traveling outside Germany with the intent to receive terrorist training is a criminal offense punishable according to Section 89a German Criminal Code.” (Gesley, 2015, p. 1)

The above mentioned counter-terrorist legislation has been definitely influenced by the European law but not only by the law of EU but also by the Council of Europe (CoE) Convention²⁶. Nonetheless, as we demonstrated and as Anneke Petzsche argued,

²⁶ Council of Europe Convention on the Prevention of Terrorism or Council Framework Decision 2008/919/JHA.

Germany has a strict anti-terrorist legislation which has been toughen even more as a reaction to rise of Islamism in the Middle East, Europe, and Germany itself. German counter-terrorist goes beyond the common European framework and criminalizes acts which are not normally criminalized in Europe. (Petzsche, 2012, p. 9-10)

2.1.4 Islamist terrorist attacks and terrorist attacks against Islam

The Global Terrorism Index (GTI), annually published by the Institute for Economic and Peace, ranks 162 countries based on four indicators weighted over five years. GTI score for a given country is based on relative weight of following indicators: 1. total number of terrorist incidents, 2. total number of fatalities caused by terrorists, 3. total number of injuries caused by terrorists, 4. a measure of the total property damage from terrorist incidents in a given year. (Global Terrorism Index 2015, p. 95) The GTI ranked Germany as the 53rd country and it scored 3,442 points. This score has changed since 2014 by 1,676 point. (GTI, 2015) Data which are stated by GTI would be more useful if we assessed the overall counter-terrorism measures and legislation in Germany. Nonetheless, our aim is to assess German approach toward radical Islam. Data used in GTI were extracted from the Global Terrorism Database (GTD)²⁷. We have used the same database and extracted the terrorist attacks which were motivated by radical Islam in Germany. Since 2002, there have been four terrorist attacks executed by Islamist or motivated by radical Islam in Germany. Two people were killed and three people were injured during these attacks. This includes the uncovered plot to blow up two trains. The attacks were not carried out because bombs were noticed by rail workers. We included these attacks because they were already executed and thwarted only shortly before bombs exploded. Another attack, which we included, is open gun fire on the US Air Force Personnel by Kosovar gunman. Two people were killed and two people were injured. Nonetheless, it can be disputed that attack had an Islamic nature, it was reported that attacker shouted Islamic slogans before he opened fire. (Mailonline, 2011) Hence, we may identify it as Islamic terrorist attack. In 2012, the explosive device was placed at the main rail station in Bonn but bomb failed to detonate was defused later on. No individual, group or organization claimed responsibility but German authorities suspected that Muslim fundamentalists were involved. The latest attack took place in

²⁷ The GTD is the most comprehensive open source unclassified database which contains information on over 140 000 terrorist attacks since 1970.

Berlin in November 2015. The policewomen were injured by the attacker who proclaimed himself Islamist. (data extracted from GTD)

The terrorist attacks which were aimed against Muslims in Germany are also included in this section. There have been six terrorist attacks aimed against Muslims in Germany but there were no casualties or injured. In all case, mosques were set on fire and that caused only some property damage. No group claimed responsibility, with an exception of one attack. Two Yazidi Kurds confessed that they set fire to a mosque in Bad Salzflen. (data extracted from GTD) In 2014, two Turkish mosques were set on fire. In this case, the attack might not be primarily focused on Islam and Muslims in general, but specifically on Turks because of relations between Kurds and Turkey which were even worse due to contemporary situation in Syria and Iraq. However, this is only an assumption and it is likely that it might not be correct. Hence, we included these attacks as terrorist attacks against Muslim in Germany.

2.1.5 State – Islam relation

After Germany acknowledged that Muslims have become an integral part of the German society, it as an inevitable to institutionalize the relation between the state and Islam and change the Muslims' identity from German Muslims to Germans. The aim is not a creation of a new framework for Islam itself but its incorporation into the existing relations between the state and other religions. (Laurence, 2012, p. 11, 13) In contrast, previous German approach toward German state's relation with Muslim inhabitants was segregative. This segregative approach toward the immigrants (including Muslims) can be demonstrated by the fact that through 1990s Germany still allowed Turkey to manage the religious matters of Muslims in Germany. Turkish students²⁸ were provided Islam religious instruction within the framework of Turkish language courses provided by Turkish government. (Laurence, 2012, p. 40)

Many Islamic associations operate in German public space, some of them are directly associated with Turkey²⁹. Nonetheless, their influence is limited because of the nature of Muslim understanding of faith. The Islamic organizations are not part of Muslim religious culture; hence only 10 – 15% of Muslims living in Germany are organized in these structures. (Dehn, 2005, p. 47) There are two types of status which can be acknowledge to religious organizations, including Islamic ones. The first one is the

²⁸ Nearly a half of approximately 500 000 Turks of school age.

²⁹ E.g. Turkish Islamic Union for religious affairs.

status of corporation of law which is granted by individual federal states, so the list can vary from state to state. This status also grants the right to levy a church tax, power over the religious courses at public schools, open confessional schools and places to worship, right to free broadcasting on the public radio and television, and others. (Amiriaux, 2001, in Globalization, Migration, and Future of Europe, Bruce, 2012, p. 29) The second type is registered association status which is the legal form of almost all Muslim associations in Germany.

The most important milestone in the development of relation between German government and Muslims was reached in 2006. The German Islam Conference (Deutsche Islamkonferenz) was created. Its creation was proposed by the Minister of Interior and it meant to act like interlocutor for the state with respect to Islamic religion related questions. Islamkonferenz was created as a forum for discussion which supposed to bring together representatives of government and Muslims who were active in Islamic associations and organizations in Germany. The main outcome of Islamkonferenz was the creation of the Coordinating Council of Muslims in Germany (KRM) which united prominent Islamic associations³⁰. The problem of KRM was its inability to act and missing legal status. It has only become a coordinating institution of existing associations with dominant role of Turkish Islamic Union for Religion Affairs. In addition, Islamkonferenz was criticized in 2010 because it has lost part of its relevance due to the absence of two main Islamic associations in the conference. (Bruce, 2012, p. 28-30)

The mosques are the most visible evidence of presence of Islam in Germany. It also might indicate to which extent Muslims in Germany are able to publicly demonstrate their faith. The absolute number of mosques is the highest among all EU countries and it accounts for approximately 2600 mosques in total. (Allievi, 2009, p. 23) It means that Germany has approximately one mosque per 1584 Muslims. Germany is also the country with significant number of purpose-built mosques.³¹ The important role plays the presence of ethnic Turks and Turkish citizens which are supported by Turkish government in terms of financing the construction of mosques and training imams. (Allievi, 2009, p. 28 - 29)

Another visible manifestation of Islam in public space are burqas. The legislation which regulates wearing burqas is a good indicator how majority in Germany approaches the

³⁰ It did not include Alevis.

³¹ The buildings specially built to serve as mosques.

public demonstration of Islam. Germany did not impose a full ban on wearing veils. However, in 2003, constitutional court has decided that federal states can impose this ban on school teachers. The half of all federal states has already banned teachers to wear veils and headscarves (burqas) in schools. Nonetheless this ban was proclaimed as an unconstitutional in 2015. Employees in municipal administration in many federal states are also not allowed to wear veil during their service. (Ghosh, 11. 12. 2015) These approaches and legislation toward the burqas might indicate that Germany is struggling to define its position.

In conclusion, Germany has been trying to redefine its relation toward Islam in recent years. Islam is clearly visible in compliance with the laic nature of the state and German approach appears to be tolerant toward Muslims. On the other, the creation of some kind of “Muslim church” was not accomplished and there is a presence of foreign influence by the means of Islamic organizations (especially Turkish).

2.2 Case: France

France is a prominent example of assimilation integration type. French national identity is often portrayed as highly integrative. The idea of the “French” identity originates in French revolution in 1789 which set foundations of contemporary French self-understanding and identity. (Bertossi, Hajjat, 2013, p. 1)

France itself can be understood as the country of immigration since the French revolution in 1789.³² France experienced large scale immigration (significant part of immigrants originated in Muslim countries) more than 100 years earlier than other Western European countries. Nowadays, France has the biggest Muslim population in EU, roughly 4 704 000 Muslims live in France. (Pew Research Centre’s Forum on Religion and Public Life, 2011) Nevertheless, France has never understood itself as the nation of immigrants. Despite of the fact that immigrants have been present in France for a relatively long time, France has never acknowledged immigrants as a constitutive part of the French society. It includes Muslim immigrants coming especially from Maghreb countries, namely from Algeria which has been an integral part of France. This approach changed in 1997 when the Weil’s report was published and that led to a reassessment of citizenship law and laws related to residence permits of foreigners in France. (Barša, Baršová, 2005, p. 160) As result of this report, the laws were passed and

³²Or at least since the Napoleonic era.

changed the nature of French immigration and integration policy which became less restrictive, respectively assimilative. We will discuss this in next sections in detail. In conclusion, France has always asserted strong assimilative policies toward immigration what was strengthened by French secularity and republicanism. Therefore all immigrants were obliged to accept universalist values promoted by the French republic.

2.2.1 Citizenship

From the point of view of French jurisdiction, nationality and citizenship are two distinct notions. Nationality and the ways of its acquisition are defined by the Civil Code (Code Civil) and citizenship is defined by the Constitution of France. (European Union Democracy Observatory on Citizenship: Citizenship or nationality?, 2016)

Currently, we are able to list four main ways how can a foreigner acquire the French nationality - by naturalization, by birth (*ius solis*), by marriage, and by military service³³. Process of naturalization is in detail described in the Code Civil - applicant needs to be at least 18 years old, has been living in France continuously at least for five years. Furthermore, the applicant has to prove that he/she has been working in France for at least five years. For foreign applicants (i.e. not from EU, EEA, or Switzerland) there is a necessity to also have a residence permit. (Code Civil: Chapter 3, Section 1, Paragraph 5, Article 21-17, 1993) The duration of residence may be reduced to two years if the applicant has successfully completed two years of study in a French institution of higher education or has provided or may provide “significant services” to France. (Code Civil: Chapter 3, Section 1, Paragraph 5, Article 21-18, 2011)

In case of acquisition of the nationality by birth or by marriage, there have been introduced many changes during the years. The reform of citizenship law in 1998 has brought many significant changes in terms of acquisition of French nationality, as for example restoration of the principle that young foreigners born in France to foreign parents and resided in France for at least five years can demand French nationality at the age of sixteen, and acquires its full benefits when becoming eighteen years old. Furthermore, the period for the acquisition of nationality by marriage was reduced to one year. The law has also facilitated the acquisition of French nationality by recognized refugees. The law from 2003 has introduced new conditions for assessing

³³ The law from 29 December 1999 allows foreign legionnaires in French army, who were wounded in battle, to become "French by spilled blood" ("Français par le sang versé"). (Ministry of Interior : Historique du droit de la nationalité française, 2011)

the level of assimilation into the French society. One of them is knowledge of rights and duties conferred by French nationality. The acquisition of nationality by marriage has been more strictly regulated. One from the couple could acquire the nationality after 2 years of marriage, but only if the couple lived in France for at least 1 year; otherwise it is increased to 3 years. Sufficient knowledge of the French language has become another condition for acquiring the nationality. The law on immigration and integration from 2006 has extended the period of marriage life to 4 years if the couple lived in France for at least 3 years. In the interest of equal treatment, nationals of countries which were formerly under the French sovereignty or trusteeship are now subjects to the ordinary law of five years of residence in France. Finally, the welcoming ceremony into the French citizenship is extended to all new French citizens, regardless of the mode of acquisition of the French nationality. (Ministry of Interior: Historique du droit de la nationalité française, 2011)

However nationality is the necessary, yet not sufficient condition for acquiring French citizenship. There are also other criteria that the applicants need to meet. The law from 2011³⁴ focuses on the linguistic and cultural assimilation of foreigners applying for French citizenship: higher level of the French language is expected; they must have sufficient knowledge of history, culture and French society, and adhere to the core principles and values of the Republic. (Ministry of Interior: Historique du droit de la nationalité française, 2011) These principles and values, as well as symbols of the Republic, are listed in the Charter of the Rights and Responsibilities of a French Citizen. Applicant must sign the Charter which is given to him during the ceremony when acquiring the citizenship. (Gabizone, 16.11.2011)

There are also some specific cases when foreigners do not need to have French nationality to acquire French citizenship: refugees, those who have contributed “exceptional services” to the French state, non-French citizens from countries where French is one of the official languages, and have been enrolled in a Francophone teaching institution for at least 5 years. (Ministry of Interior: Historique du droit de la nationalité française, 2011) In conclusion, French citizenship’s acquisition is relatively liberal. Despite of this fact, French citizenship is also understood as civilization project – one must accept French national identity, secularity, and values. (Bertossi, Hajjat, 2013, p. 35)

³⁴Law n° 2011-672 from June 16th 2011 on immigration, integration and nationality (LOI n° 2011-672 du 16 juin 2011 relative à l'immigration, à l'intégration et à la nationalité)

2.2.2 Residence permit

“The residence permit is mandatory for all third country nationals (non-EEA/Swiss) over the age of 18 who want to stay in France for longer than 3 months. Minors (aged 16 or above) who wish to work in France are also required to have a residence permit.” (Your Europe: Registering your non-EU family members in another EU country – France, 2014)

EU Blue Card and EU permit for permanent residence are obviously valid and can be acquired on French territory. Moreover, France has four types of own residence permits - temporary residence card, card of the resident, “special skills and talents” residence card, and “retired” residence card. Temporary residence card is valid for one year and can be renewed. There are more kinds of the card which can be issued for various reasons, for example for visitors, students, professionals, and for private or family purposes. The individuals can also acquire card of the resident which is valid for ten years and also can be renewed. This card represents permanent residence permit and is issued to foreigners who have been residing legally in France for at least five years. There are two more special types of the permit - special skills and talents residence card which is valid for three years (can be renewed) and is issued to individuals who can significantly contribute to the development of France; and retired residence card which is issued for ten years (can be renewed) to individuals who lived in France for at least ten years with the card of the resident, have their habitual residence abroad, and receive a retirement pension from the French social security). (Service Public: Titres, documents de séjour et de circulation des étrangers non européens, 2016) In general, French policies of granting residence permits more or less comply with other EU states.

2.2.3 Counter-terrorism measures and radical Islam

As a target of international terrorism, France has introduced many laws and taken also practical measures with the aim of combat terrorism in all its forms. Legal framework was created in few stages, always after series of events on the international scene. The keystone of counter-terrorist laws is the Act No. 861020 of 1986 on action against

terrorism, which was a reaction to the situation in Middle East at that time, especially in Algeria. In contrast with other EU countries, France had earlier experienced an Islamic terrorism. (Shapiro, Suzan, 2013, p. 79) This law has been regularly updated. Events of 11th September 2001 were the impulse for reinforcement of antiterrorist laws. In short period of time, France adopted many of them, for example Act No. 20011062 of 15 November 2001 on everyday security, Act No. 2003239 of 18 March 2003 on internal security, Act No. 2004204 of 9 March 2004 bringing justice into line with new patterns of crime, Act No. 200664 of 23 January 2006 on action against terrorism, containing various provisions on security and border check. (Committee of Experts on Terrorism (CODEXTER) Profiles on Counter-Terrorist Capacity, 2013, p. 1)

As many European countries with sizable Muslim population, France has recently experienced problems with foreign fighters. ICSR estimates that there are approximately 1200 in the end of 2014. According to government's sources this number is even higher. The government's estimates refers to 1800 foreign fighters who were fighting in Iraq and Syria in September 2015. (Barrett et col., 2015,p. 12)

As in other cases, we will use the number issued by ICSR because they applied the same methodology to count foreign fighters in all countries. There roughly 18 foreign fighters per million population. (Neuman, 2015) It accounts for approximately 255 per million Muslim population foreign fighters fighting in Syria and Iraq.

As other countries which experienced the problems with its residents and citizens fighting in war on the side of radical Islamist. France has also passed a laws which were supposed the counter their travelling abroad and cope with returnees who might plan terrorist attacks in France itself in the future. The French government also acknowledged a severity of threat posed by returnees. French legislation also offers a wide definition of terrorism, so called association of "wrongdoers" offence which allows to cope with a broad range of suspects. The law also deals with foreign fighters via three objectives: prevent people from leaving French territory if there is a chance they will engage in terrorist activities, counter online propaganda, and criminalize preparation of terrorist crimes. (Country Reports on Terrorism 2014, 2015, p. 104) The legislation is built upon the counterterrorism act passed in 2012 that allows French authorities to prosecute those citizens who returned to France after committing terrorist attacks abroad or after being trained abroad with an intention to commit terrorist attacks in France.

The French universalism and tendency to assimilate all incoming immigrants and make them accept the French values is also evident in counter radicalization measures. This includes civic education in school and vocational training for adult immigrants who has never attended French school system. (Country Reports on Terrorism 2014, 2015, p. 106) In conclusion, France counter-terrorist measures more or less correspond with many other countries' measures and legislation and it cannot be considered as insufficient in EU context. However, France has experienced significant problems with radical Islam.

2.2.4 Islamist terrorist attacks and terrorist attacks against Islam

According to the GTI, France is ranked as 36th country with its score 4,553 points. This score has improved since 2014 by 0,331 point. (GTI, 2015) Of course, these numbers represent all kinds of terrorist attacks but we want to focus on the Islamist ones or motivated by radical Islam, that's why extracted data from GTD and other sources as well.

Since 2002, there have been eighteen terrorist attacks in France. Four of these attacks were not officially confirmed to be motivated by radical Islam, but French authorities suspected that Islamist motives had been involved. (Data extracted from GTD) Because GTD includes data only till the end of year 2014, we had to find another sources to illustrate this issue. According to available information gained by media research, there were eight attacks motivated by radical Islam from January 2015 until January 2016. So in one year, France has experienced as many Islam related attacks as in the period between the years 2002 - 2014. Six³⁵ of them were led by individuals, so called lone wolves, who acted alone, motivated by radical Islam thoughts. Two of them were unsuccessful (Willsher, 22.4.2015; France24, 8.1.2016). Two biggest and deadliest attacks both happened in Paris. Well-known from the media, is the attack on French satirical magazine Charlie Hebdo and a kosher supermarket that happened in January 2015. (Irish, Sage, 7.1.2015) The attack on Charlie Hebdo was mainly motivated by previously published caricature of Prophet Muhammed who is an untouchable figure in Islam faith; the attack on the kosher supermarket happened two days after the drama in Charlie Hebdo but these two cases were linked because the attackers knew each other.

³⁵April 2015, Paris, Villejuif: shooting (Willsher, 22.4.2015)

June 2015, Saint-Quentin-Fallavier: beheading (Walker, Malik, 26.6.2015)

August 2015, Train Amsterdam-Paris: Stabbing and shooting (BBC, 26.8.2015)

January 2016, Valence: ramming by car (Grange, 2.1.2016), Marseille: stabbing (Chrisafis, 13.1.2016)

In this case we may observe the different point of view of French secularity and its state-religion relation in general, including Islam. In November 2015, the attack with significant number of casualties happened in Paris. Cooperating groups of Islamic radicals attacked on many places all around Paris - bombing at the stadium Stade de France, gun shooting at six restaurants and bars in 10th and 13th districts, and another shooting in the Bataclan concert hall. There were 129 casualties and hundreds of injured. Islamic State claimed the responsibility for the attacks and French prosecutors said they were “*revenge for French military action in Syria and Iraq*“. (Melander, Penetier, 14.11.2015) Together, during all attacks in France since 2002, around 162 people were killed and more than 417 were injured. (Data extracted from GTD and previously mentioned newspapers’ articles)

On the other hand, GTD also provided the data about attacks against Muslims. Between years 2002 - 2014, there were only three attacks during which nobody was injured according to GTD. (Data extracted from GTD) unfortunately, we do not have any comprehensive data and that’s why this part of the work is inevitably imperfect for the period since 2015. We have not monitored all attacks in detail in the period since the beginning of 2015, but according to available media sources we can assume that their number is increasing. It was visible mainly after attacks on Charlie Hebdo. “*After those events, numerous mosques and prayer halls were attacked, daubed with graffiti or set on fire, and pigs’ heads were hurled into several.*” (Chazan, 30.12.2015) After the massacre in Paris in November 2015, police and soldiers have been guarding almost half of the mosques in France to prevent possible attacks. (Chazan, 30.12.2015) However, majority of these incidents cannot be classified as a terrorist attacks but they illustrate a changing attitudes toward Muslims.

In conclusion, France experience many Islamist terrorist attacks and tendency is rising. Recently, attacks had a huge scale and caused many casualties. France has long lasting experience with terrorism, including Islamic one. Good example is war between Algeria and France which damaged their relations and created a space of Islamism. Recent attack on Charlie Hebdo was also performed by Algerians and their act might have background in French – Algerian war and a situation created by this conflict. (Fisk, 9. 1. 2015) If we want to assess French counter-terrorism policies and effectiveness of integration we have to take into the consideration a fact that there are other factors which might influence the country’s performance. Despite of this other factors France

should counter these threats and therefore it could be performed better and be more effective.

2.2.5 State – Islam relation

France is a strongly secular state which promoted assimilation policies toward immigrants. France interprets secularism as a strong relegation of all public expressions of religion. All religions should be practised exclusively in private. (Ali, 2012, p. 1) The reassessment of French immigration after the Weil's report has changed not only the legislation but also approach of French government towards Muslims. In 1997, Jean-Pierre Chevènement³⁶ started the motion toward the creation of the French Council of the Muslim Faith (CFCM). The key point of CFCM was signing the text by the Muslim leaders. Muslim leaders were supposed to solemnly declare their attachment to the fundamental principles of the French republic. All Islamic associations which wanted to participate in CFCM were obliged to commit themselves to these principles. (Bruce, 2012, p. 26) The CFCM also articulated the need for Islam to incorporate itself into the existing framework in which the other religions were organized since 1905. It means that Islam should recognize the separation of state and church. (Billon, 2005, p. 26 – 27) The CFCM's foundational document basically required Muslim leaders to recognize and accept the state and its laws but at the same time French state did not legally recognize Islam.³⁷ These terms presented by the French government were accepted by many large Islamic associations, independent mosques³⁸, and six individuals. (Bruce, 2012, p. 26) The CFCM was able to introduce effective voting mechanism to elect its members and managed to settle relations between the most important Islamic associations³⁹. In addition, the election to CFCM also promoted ideas of democracy and free election between the Muslims, especially among those who do not hold French citizenship and are unable to participate in national elections. In addition, the integration of the second and the third generation was also encouraged by the structures for organization of Islam. In this context, the religion can be understood as tool of French authorities to integrate Muslims into the society. Nonetheless, CFCM also empowered the position of foreign countries in promoting Islamic values because it allowed an

³⁶ French minister of Interior at that time.

³⁷ The French republic does not recognize, employ, nor subsidize any religion. (Article II. Loi du 9 décembre 1905 République Française. (Bruce, 2012, p. 35)

³⁸ These are mosques which are not officially linked with any Islamic association

³⁹ Union of Islamic organizations in France, Great Mosque of Paris, and National Federation of French Muslims.

involvement of non-citizens who still have an allegiance to their home states which support them.⁴⁰ (Bruce, 2012, p. 27 - 28)

The strong evidence of Islam's presence in France are the mosques. France has the biggest Muslim population in the EU and the long lasting experience with Islam on its territory since the colonial era. This strong presence of Muslims in French society can be demonstrate by the total number of mosques. There are approximately 2100 mosques in France. (Allievi, 2009, p. 23) Nonetheless, this number seems to be lower if we calculate the number of Muslims per one mosque. It accounts 2240 Muslims per one mosque. Despite the republicanism and secularism which have led to assimilative integration policies, the state's approach toward mosques seems to be more pragmatic. The evidence of this approach is the construction of Great Paris Mosque in 1926 or the fact that the mosques were often part of the accommodation intended for Muslim immigrants. This pragmatic approach was applied because it was supposed to ensure a social peace at low cost. (Allievi, 2009, p. 26) However, the number of mosques and their visibility in context of other EU countries is quite moderate in France.

In contrast to pragmatic approach toward mosques, the French government applied more restrictive policies toward Islamic religious symbols⁴¹. As we mentioned before, France is a secular state and it does not tolerate the presence of religion and its symbols in public. Islamic symbols were also considered as an undesirable. In 2004, French law banned religious symbols in public schools and public institutions worn by public officials. This ban also included burqas. The law was criticized but French government argued that the law is only promoting secular nature of France and religious symbols do not belong to schools and public space. (Powell, 2013, p. 119) However, this is usual practise in other states as well. Nonetheless, French government goes beyond this legislation regulating religious symbols, including burqas. In 2011, a new law⁴² was passed and it forbids women to wear a veil or otherwise cover the face in public space. The breaking of this law is punishable by fine. These fines were imposed on women wearing face veil. (Powell, 2013, p. 119, 144) The decision to ban face veils was highly controversial and it breaches the European Convention on Human rights because it violate an internationally recognized human right to express their religion in public.

⁴⁰ This support is evident in case of and National Federation of French Muslims and Coordination Committee of Muslim Turks in France. On the other hand Algerians do not rely on this support.

⁴¹ The same applies to other religions.

⁴²Loi 2010-1192 du 11 octobre 2010 (Law 2010-1192 of October 11, 2010)

(Powell, 2013, p. 146) On the other hand we might argue that the ban was established to maintain public security and French secularity.

In conclusion, France applied restrictive and assimilative policies toward Islam with an exception of construction and operation of the mosques. These policies are mostly the legacy of French traditions, namely republicanism and secularism. In general, we might assess French policies toward Islam in France as strongly assimilative what is in compliance with France as the assimilative integration type.

2.3 Case: Sweden

Muslim population in Sweden represents approximately 4,9 % of the entire population. There are 451 000 Muslims currently living in Sweden. (Pew Research Centre's Forum on Religion and Public Life, 2011) Sweden is often referred as an example of multicultural integration model. Since the end of the Second World War, Sweden has experienced inflow of immigrants. The general policy was to create a multicultural society. Nonetheless, multiculturalism in Sweden cannot be understood as consolidating of ethnic differences. The multiculturalism in Sweden is understood as full integration into the society with all rights, religious freedoms, ethnic and cultural identification, support of religious, migrants, and minority organizations. Swedish specific is also an extensive welfare state which should support further integration. (Effectiveness of National Integration Strategies Towards Second Generation Migrant Youth in a Comparative European Perspective – EFFNATIS, 2001, p. 36-37) The welfare state did not inevitably led to the better integration and critics argue that the focus of the state (and welfare state) was only on the individuals, not groups. (Runblom, 1994, p. 635)

The pluralism approach, supplemented with welfare state principles, was main concept which formed Swedish integration policy. As we previously mentioned, multiculturalism in Sweden is understood as equality in all areas. The same rules are applied in case of Swedish welfare state which should be comprehensive⁴³. (Runblom, 1994, p. 634) The Swedish pluralist approach also led to increasing number of immigrants, including Muslims. The majority of Muslims in Sweden have emigrated from former Yugoslavia because of the Yugoslavian war in early 1990s. Bosnian Muslim represent the 2nd largest minority in Sweden⁴⁴. Another major influx of Muslim immigrants was recorded in 1970s and 1980s, mostly from Iran and Iraq. The same

⁴³ It should incorporate everybody, including immigrants.

⁴⁴ Finns are the largest minority in Sweden.

“open door”⁴⁵ policy was applied during the current influx of immigrants. Sweden’s “open door” policy was preserved until very recently. This policy has only started to being reassessed in 2015 as a reaction to migration crisis. However, proposed changes are only meant to be temporary. (Government Offices of Sweden’s Press release, 8. 4. 2016) Nonetheless, we are not assessing current migration crisis in the EU, these changes might influence Swedish immigration and integration policies and attitudes toward the Muslim immigrants and subsequently lead to change of Swedish multicultural model of integration to more restrictive, respectively assimilative one. However, Sweden’s multicultural approach has changed the country and it cannot be viewed as an ethnically homogenous country anymore because it shifted to one with a mixed ethnic background. (Runblom, 1994, p. 624)

2.3.1 Citizenship

The Swedish citizenship and its acquisition are defined in the Act on Swedish Citizenship which was adopted in 2001 (amended in 2005 and 2006). According to Act on Swedish citizenship, the foreigner⁴⁶ can acquire Swedish citizenship through the naturalization if he or she meets following conditions. The alien:

“1. has provided proof of his or her identity, 2. has reached the age of eighteen, 3. holds a permanent Swedish residence permit, 4. has been domiciled in Sweden a) for the previous two years in the case of Danish, Finnish, Icelandic or Norwegian citizens, b) for the previous four years in the case of a stateless person or a person who is considered to be a refugee under Chapter 4, Section 1 of the Aliens Act (2005:716)⁴⁷, c) for the previous five years for other aliens, and 5. has led and can be expected to lead a respectable life.” (Act on Swedish citizenship, 2006, Section 11)

The Act also allows possession of dual citizenship and does not longer promote the principle of the one citizenship. (Act on Swedish citizenship, 2006, Section 11)

⁴⁵ The policy of “open door” incorporate all immigrants, with emphasis on refugees.

⁴⁶ The term alien is used in the Swedish legislature.

⁴⁷ The chapter defines the refugees and their rights in Sweden.

Beside the special rules for EU, EEA, and Switzerland, Sweden also applies special rules for Iceland, Norway, Denmark, and Finland but the examination of this special relationship is not necessary for purposes of our comparison. Special rules also applies for acquisition of Swedish citizenship by adoption but these do not significantly affect immigration and integration of Muslims in Sweden.

In general, Swedish citizenships usually acquired via *ius sanguinis* but *ius solis* is also applied to avoid statelessness. However, Sweden has rapidly liberalized a process of acquisition of citizenship, e.g. knowledge of Swedish language is no longer required. The acquisition of Swedish citizenship is also understood as a natural outcome of integration process because new legislation strengthen the status of citizenship as a part of integration. (Bernitz, 2012, p. 19)

2.3.2 Residence permit

According to Aliens Act from 2005, Sweden provides two kinds of residence permit in general - temporary and permanent.⁴⁸

“A residence permit is a permit to stay in Sweden for a certain time (temporary residence permit) or for an unlimited time (permanent residence permit). A person who has a residence permit or has long-term resident status may enter Sweden”. (Aliens Act, 2005, Chapter 2, Section 4).

Temporary residence permit is granted as *“a residence permit that shall be for a limited time if, in view of the alien’s expected way of life, there is doubt as to whether a residence permit should be granted”* (Aliens Act, 2005, Chapter 5, Section 7) and it may be granted for work or business activities, studies, visit, etc.

Application for a residence permit has to be submitted and granted from outside of Sweden, i.e. before entering the country. (Aliens Act, 2005, Chapter 5, Section 18) State authority, the Swedish Migration Agency, may issue residence permits under various circumstances: 1. to persons who are entitled to a residence permit as being in need of protection (refugees and persons otherwise in need of protection - this is the exception when applicants can acquire permanent residency after they entered the country), 2.

⁴⁸ In addition, there are also EU residence permits.

residence permits on the grounds of ties to Sweden (spouse/fiancé or cohabitating partner of Swedish resident, foreign child who has a parent residing in Sweden, foreign child adopted by Swedish resident) - residence permits granted under this condition should be valid for at least one year, and after two years of having it alien can apply for a permanent resident permit, 3. residence permits on the basis of Sweden's international commitments, 4. residence permits on grounds of work or other means of support (permanent residence permit for foreigners who have lived and worked past five years in Sweden with residence permit), 5. residence permits on grounds of exceptionally distressing circumstances (applicant's health, his/her adaptation to Sweden and his/her situation in the country of origin). (Aliens Act, 2005, Chapter 5)

However, as we previously mentioned, this open immigration policy will temporary change for three years in the future. According to the press release, new legislative proposal contains few changes which will make the immigration policy stricter. (Government Offices of Sweden, Press release, 8.4.2016)

2.3.3 Counter-terrorism measures and radical Islam

The document which defines counter-terrorism measures in Sweden is Sweden's national counter-terrorism strategy issued in 2012. The document acknowledges that terrorism represents a serious threat but at the same time it states that terrorism including terrorism with Islamist background does not represent a vital threat to Swedish democratic system. The three basic measures how government should tackle terrorism are presented in the document - prevention, pursuing, and preparation. (Government Communication 2011/12:73, 2012, p. 5, 8) The Act on Criminal Responsibility for Terrorist Offences passed in 2003 lists action which might be considered as terrorist offences under the special circumstances. In 2010, the new Act on Criminal Responsibility for Public Provocation, Recruitment and Training concerning Terrorist Offences and other Particularly Serious Crime entered into the force. It mostly incorporates the provisions which result from the membership in the EU and CoE.⁴⁹ The criminal liability is imposed on those who publically provoke terrorism, recruit others or provide training to execute terrorist attacks. (Committee of experts on terrorism (CODEXTER): Profile on counter-terrorism capacity: Sweden, 2014, p. 2) Sweden also passed law which criminalizes travelling abroad for the purpose of

⁴⁹ Council of Europe Convention on the Prevention of Terrorism or Council Framework Decision 2008/919/JHA.

criminal committing terrorist attacks. (Ygeman, 2015, p. 18) As we can observe the majority of Swedish counter terrorism legislation is the outcome of fulfilment of international commitments of Sweden.⁵⁰ Swedish government does not go beyond these international commitments. It might be caused by the fact that Sweden did not experienced any Islamist terrorist attacks until 2005 (we are discussing the issue in more detail in next subchapter). However situation has changed in recent years. We can demonstrate that Sweden is potential target of terrorist attacks on the example of foreign fighters fighting in Syria and Iraq. Some of the foreign fighters might return and plan terrorist attack in Sweden which would pose a major security threat in the future. (Lister, 2015, p. 1-2) According to ICSR, there are 150-180 foreign fighters in Syria and Iraq which are coming from Sweden. (Neuman, 2015) It accounts for 19 per million population. If we take a look at the number of foreign fighters per million Muslim population, it will account for 399 foreign fighters. This number is based on PRC estimations of Muslim population in Sweden which was approximately 451 000 in 2010. (Pew Templeton Global Religious Futures Project, 2011) Nonetheless, other sources indicate that the number might be significantly higher. Lister mentioned that there might be approximately 300 foreign fighters from Sweden. The number is based on both government official figures and anonymous government sources. (Lister, 2015, p. 2) As a part counter-radicalization strategy in context of continuing threat of returned foreign fighters who might possibly execute terrorist attacks in Sweden, the Swedish Media Council conducted a study in which it suggested how the government should prevent the radicalization of Swedish citizens or residence with Muslim background which highlights the importance of prevention. It suggested equipping (especially young) people with tools necessary to challenge anti-democratic and radical ideas on internet. (United States Department of State, Country Reports on Terrorism 2014 - Sweden, 19 June 2015)

In conclusion, Sweden legislation and counter terrorism measures remain within the limits of international law and relevant international organizations. The Swedish counter-terrorism has developed only recently, especially counter-terrorism focused on terrorism caused by radical Islam because it is relatively new phenomenon. The Swedish Security Service also reassesses the impact of Islamist terrorism which is now

⁵⁰ The commitments mostly ensuing from membership in EU, UN, and CoE.

considered as the greatest terrorist threat in Sweden. (United States Department of State, Country Reports on Terrorism 2014 - Sweden, 19.6.2015)

2.3.4 Islamist terrorist attacks and terrorist attacks against Islam

The GTI ranked Sweden as 60th country and it scored 3,083 points in 2015. This score has risen by 1,37 points since 2014 which means that risk and severity of terrorist attacks has increased. (GTI, 2015) Same as in previous cases of Germany and France, these numbers only assess terrorism in general, not Islamist terrorism.

According to GTD, there have been just two terrorist attacks motivated by radical Islam since 2002. In 2005, the Iraqi polling station was attacked by three assailants using the Molotov cocktails. The Swedish group, which claimed to be a part of Al-Qaida, took responsibility for the attack. There were no casualties or injured. The second attack took place in Stockholm in 2010. The attacker carried three explosive devices but only one of them actually exploded. The attacker sent an audio file to Swedish news agency before the explosion. The Yemeni Islamist website also claimed that suicide bomber was “their brother and martyrdom”. Two people were injured and bomber himself died during the attack. (GTD) Nonetheless, there were only two Islamist attacks, the Stockholm bombing was the first bombing attack in Nordic countries. To addition, it was reveal the attacker travelled to Iraq to acquire a training and can be considered as a jihadist. (Ranstorp, 2011, p. 1)

Several cases of violence against Muslims have occurred; three mosques were set on fire during one week in December 2014. No group has claimed a responsibility for the attacks. There were no casualties but five people were wounded during the attack in Eskilstuna town. (GTD, 2016; Eddy, 2.1.2015)

As we demonstrated, Sweden is still not affected by Islamist terrorism in a large extent. However, the trend is rising in recent years. Most likely, Sweden will experience more Islamist terrorist attacks in the future due to relatively large number of foreign fighters’ returnees. This might lead to radicalization on the both sides and boost both, radical Islamists and worsen the perception of Islam in Sweden.

2.3.5 State – Islam relation

As we mentioned previously, Sweden is the example of multicultural integration type. At the same time, church and state have been separated since 2000. Swedish secularity

is more complex issue. It can be understood on different levels. Sweden is secular in terms of separation of the church and state; activities which were previously provided by the church are contemporary executed by state and secular bodies. The secularity can be also seen in low participation of the public in church activities. On the other hand secular state is not meant as a keeping the religions out of public space. Sweden consider itself as multicultural and multi-confessional society where state plays a neutral role but at the same time it supports various religious activities. (Jareborg, 2010, p. 8-9) For example, there was a governmental initiative to provide training for Imams but it was not passed due to concerns about the breaching the secular nature of state. Nonetheless, this initiative was also understood as an effort of government to control Imams' education and counter a radicalization of Muslims. (Larsson, 2014, p. 308)

The majority of Muslims residing in Sweden were asylum seekers and refugees at that time. It designated the relations not only between the state and Muslims but also between Muslims themselves. Muslim population in Sweden is very diverse, including Turks, Iranians, Iraqis, Bosnians, and other. Nowadays, Syrians are forming significant Muslim group in Sweden. Managing these relations or institutionalize them is rather difficult. (Nordstrom, 2010, p. 37)

In 1990, the relations between state and its Muslims inhabitants has been institutionalized for the first time, Islamic Cooperation Council (Islamiska Samarbetsradets - IS) was created. (Laurence, 2012, p. 13) Nowadays, there are three umbrella organizations which take patronage over local communities and organize approximately 75 % of Muslims in Sweden. Other organizations are also present in Sweden but they do not receive any governmental support. (Euro-Islam: News and Analysis on Islam in Europe and North America: Islam in Sweden, 2016)

The number of mosques in Sweden is relatively low. Despite country's multicultural integration approach, the total number of mosques is approximately 50. It means that there are more than 9000 Muslims per one mosque. This number might appear low but Allievi argues that it is caused by typical non-fervour for all confessions in Sweden. However, greater proportion of Swedish mosques are built in purpose which points out Swedish openness and its emphasis on multiculturalism. (Allievi, 2009, p. 34)

The religious symbols are not forbidden in public space. In this matter, Sweden promotes multicultural and tolerant approach which respects the rights of individuals to express their religion. In fact, there are no regulations or laws which adjust the wearing of the veils in Sweden in public space. However, Swedish National Agency for

Education has published a guideline according to which teachers are permitted to ban burqas or other types of veils which cover a whole face. This can be done if teacher thinks it might worsen interactions between students and the teacher. (The Local, 11.1.2012)

3. Comparison

In the previous chapter, we have analysed the three individual cases and we assessed how Germany, France, and Sweden cope with integration of Muslims, how they manage relations with Islam and how they counter radical Islam. In this section we are assessing which approach was the most effective and if strategies and policies toward Muslims and radical Islam subject to the convergence.⁵¹

3.1 Governments' measures

3.1.1 Citizenship

The citizenship represent government's input and indicates a willingness of government to incorporate immigrants, including Muslims into the society. All three studied countries have recently amended or changed their citizenship laws. In general, requirements to acquire citizenship in all three countries have been simplified. From all three countries Germany appears to maintain the most restrictive policies when it comes to acquiring the citizenship. Despite of the fact that Germany has changed its citizenship law and shifted from *ius sanguinis* to *ius soli*, country remains rather restrictive because person has to choose between German and citizenship of his/her parents when turning 21. France has similar provision upon turning 16 but person is allowed to have dual citizenship. On the other hand, Sweden mostly uses a principle *ius sanguinis* and *ius soli* is only applied to avoid statelessness. This might appear restrictive but the process of naturalization is more liberal in Sweden. In contrast with Germany and France, there are no language requirements to obtain citizenship in Sweden. In addition, both France and Germany require commitment to their values and principles. France goes even further and understands process of naturalization as an opportunity to assimilate future citizens into the French society. Germany is the most restrictive country in terms of acquisition of citizenship. Nevertheless, it do not asserts segregation approach as before. According to previously mentioned, Germany is located closer to assimilation model in the axis assimilation - multiculturalism. France still shows great tendencies to assimilation and it can be marked as strongly assimilative – it is not so difficult to acquire citizenship but a person has to fully assimilate into the dominant French society. Swedish model is clearly multicultural, despite of the dominance of *ius sanguinis* principle. This process of acquisition of citizenship does not directly cope with issue of Muslims and radical

⁵¹ See the methodology for more details about research design.

Islam but it is important because it illustrates integration types and set a framework for inclusion of all immigrants, not excluding Muslims.

3.1.2 Residence permit

The residence permit is an indicator which might be also used for assessment of immigration policies. However, in the framework of this thesis is used to evaluate country's willingness to grant permanent residence and therefore permanently incorporate immigrants into the society – integrate them. In general, residence permits are heavily influenced by the common EU norms. This significant convergence in the indicator of residence permits is mostly caused by inevitable coordination of immigration of the third nationals in the EU. This process of convergences is natural outcome of creating so called “Fortress Europe” which characterized by free movement of persons within the EU and at the same time by the reluctance to allow the third nationals to enter this area of free movement. The state itself is no longer able to control immigration and it has to necessarily engage in the international organizations. (Lang, 2008, p. 22) All examined countries⁵² pursue almost identical residence policies. However, Sweden goes beyond this common framework and enables refugees to obtain permanent residence permit without fulfilling requirements to obtain it.⁵³ This practise confirms Swedish open door policy and multicultural approach toward immigrants. We will not place France and Germany in the axis multiculturalism – assimilation because their policies are rather neutral and comply with the EU and international norms. On the other hand, Sweden exceeded this common framework without other specific assimilative and simplifies the acquisition of permanent residence permits. Therefore, we might conclude that Swedish approach shows signs of multiculturalism in the indicator “residence permit”.

3.1.3 Counter–terrorism legislation and measures

After the 9/11 terror attacks, many countries acknowledged a severity of terrorism and Islamist terrorism in particular, all three studied countries passed a counter-terrorism legislation. Another major changes were made in relation to rise of IS and phenomenon of foreign fighters. We may conclude that all observed countries were reacting to same

⁵² This applies for the majority of the EU member states.

⁵³ In the context of current migration crisis, the rule is revised by the Swedish government and it might return to a common practise in the EU – granting refugees temporary residence permits.

security situation in both cases. The Islamist terrorism and radical Islam have become a major threat to national security of Germany, France, Sweden, and many other Western countries. It is only logical that different countries passed a similar legislation to counter terrorism (predominantly Islamic but official documents and laws always refers to terrorism in general) as a reaction to identical types of threats. In addition, the common framework was provided by the membership in the international organizations.⁵⁴ Sweden has probably the least strict counter-terrorism legislation and does not take any special additional measure which yaws from the international and European counter-terrorism and counter-radicalization framework. Sweden also puts an emphasis on prevention and does not apply so severe restrictive measures. In contrast, Germany passed a legislation which allows using measures going beyond common framework and yaws from ordinary measure taken by other two countries. For example, travelling abroad with an intention to receive a terrorist training was criminalized. France stands somewhere between Germany and Sweden when it comes to a level of criminalization of certain acts which might lead to terrorism. However, French president Hollande proposed plans to strip of French citizenship from dual nationality citizens who are convinced of terrorism. Current law already allows to strip of French citizenship in case that person is convicted of terrorism and acquired citizenship through the naturalization. The new law would also apply to those citizens who had acquired citizenship through *ius solis* principle. (Chrisafis, 24. 12. 2015) French assimilative approach is also present in counter-radicalization measures. France itself identifies a need to promote its universal and secular values in order to prevent radicalization of immigrants⁵⁵, including Muslims.

The “Counter–terrorism legislation and measures” offers overview and assessment of norms and measure which are used by Germany, France, and Sweden. We cannot use integration typology to evaluate counter-terrorism and counter-radicalization measures, however countries may apply some features of integration types, especially France has taken measures which clearly originate in its assimilative approach. Since we do not work with a comprehensive data including high number of cases, evaluation is based on previous qualitative assessment of individual aspects. Germany, France, and Sweden are ordered based on extent and strictness of counter-terrorist and counter-radicalization

⁵⁴ E.g. Council of Europe Convention on the Prevention of Terrorism or Council Framework Decision 2008/919/JHA.

⁵⁵ This applies for all generations of immigrants.

measures. Based on these assumptions, countries are in following order: France and Germany share the first and second place and Sweden holds the third place.

3.1.4 Relation between state and Islam

All studied countries understand themselves as countries of immigration since Germany has changed its own self-understanding and identifies itself as immigration country. All three countries also incorporate Islam in the existing framework in which are organized other religions. Germany has created the organization Islamkonzerenz which lacked executive power and became only the forum for discussion between various Islamic organizations and the government. On the other hand, France has created functioning organization CFCM which established voting system and obliged the participating Islamic associations to accept French values and secularism. In this sense, state – Islam relations were mainly used by French government to incorporate Islam into the French secular state. We may evaluate them as highly assimilative with little respect to Islamic tradition. Swedish state is completely separated from the religion. Nevertheless it is not secular in the French sense. Sweden also financially supports different churches and religious associations, among them also Islamic ones. Sweden approach in this matter is multicultural with a notion of open, multi-religious, and multi-ethnic society. Nonetheless, Sweden also shows signs of assimilative tendencies, e.g. initiative to train Imams was proposed which can be officially explained as an effort to support Islam but it would likewise create an opportunity to control Imam and cast an influence of religious life of Muslims. This would be similar to French assimilative efforts. Germany has also incorporated Islam into the existing framework. However, the legal status of corporation of law which enables enjoying various benefits (including levy a church tax). Problem is that almost no Muslim organizations obtained this status and are somehow excluded from the common framework in which other religions operate. We can illustrate remnants of former segregative approach toward Muslim immigrants on this example.

Germany has the highest proportion of mosques per Muslim population. France has lower proportion but it does not significantly differ from German one⁵⁶. Sweden proportion is significantly lower but many mosques are built on purpose which indicates openness toward Islam. In this indicator, all countries appears to promote multicultural

⁵⁶ Germany: 1584 Muslims per mosque, France: 2240 Muslims per mosque, Sweden: 9000 Muslims per mosque.

approach toward Islam. In term of wearing burqas, France is strongly assimilative and banned burqas also in public space. Sweden has more or less benevolent approach toward wearing burqas and applies only minor restrictions in schools. Germany stands somewhere between French and Swedish approach which is neither assimilative nor multicultural.

3.2 The effectiveness of integration of Muslims and combating radical Islam

Effectiveness is measured by number of Islamist terrorist attacks, number of foreign fighters in Iraq and Syria, and perception of Muslims by natives (polls, terror attack against Muslims).⁵⁷

The first indicator is number of Islamist terrorist attacks. The indicator predominantly measures the effectiveness of counter-terrorism legislation and measures. The total number of terrorist attack is highest in France. This indicates that effectiveness of counter-terrorism measures is lower than in other two countries. However, the assessment of the whole counter-radicalization policy solely on crude numbers and without understanding a broader context. French intervention against IS (recent bombing campaigns in Iraq and Syria) is understood as a jihadists' justification of terror attacks in France itself. (Yeo, 2015, p. 2) If we look closely at rising number of terrorist attacks and rise of IS in Syria and Iraq, we can correlation between them. The IS also claimed responsibility for majority of recent attacks in France, including two with highest number of casualties: Charlie Hebdo attacks and attacks in Paris in November 2015. This might be the explanation why there were some many Islamist terrorist attacks in France recently but the fact is that French authorities were not able to stop them. France also struggles to integrate Muslims into the society and French Muslims are becoming more frustrated. (Yeo, 2015, p. 2) French assimilative approach may even deepen the radicalization and frustration of Muslims. For example, the unpopular ban of burqas is associated with many protests coming from Muslim community. Germany and Sweden only experienced a relatively small number of attacks. Germany was able to thwart one attack shortly before a bombs exploded. Sweden experienced only two attacks but this trend might change in future when many Swedish foreign fighter will return back to Sweden. From all three countries, despite of

⁵⁷ See methodology for more details.

factors which partly explains the situation in France, France counter-terrorism measures were the least effective.

The indicator “number of foreign fighters” refers to the extent of radicalization of Muslims in the country and inability of the state to integrate them. In addition, the number of foreign fighters are rising in every country but this increase is rather insignificant in Germany, France has experienced more significant growth (approximately 50%). Sweden has experienced the largest increase (roughly 100%) and it has also the biggest number of foreign fighters per million Muslims. We may assume that Sweden is the worst performing country in this indicator. On the other hand, Germany was the most effective in preventing its Muslim citizens and residents to join the terrorist organizations abroad. France stands somewhere between Germany and Sweden but we have to take into consideration that France has the highest absolute numbers of foreign fighters among all three countries.

The both indicators, number of terrorist attacks against Muslims and perception of Muslims in Germany and France, indicate how society perceives Muslim immigrants and how willing are individuals to commit terrorist acts against them. The one problem occurred during the assessment of this indicator. There was no research, poll or survey which would measure the perception of Muslims by Swedish. Last indicator is an evaluation of the support of political parties which has a strong anti-Muslim and anti-immigration rhetoric: Alternative für Deutschland, Front National Swedish Democrats. We will take into consideration, the results from the last two parliamentary election.

The performance of all studied counties is balanced and there are no significant differences. Germany experienced a higher number of anti-Muslim terrorist attacks but there suspicion that in some cases attacks were not motivated by anti-Islam attitudes but rather by Kurdish-Turkish relations.⁵⁸ The terrorist attacks against Muslims seems to be rather low. The perception of Muslims in Germany and France is quite similar, roughly 70 % of Germans and Frenchs (76 % of Frenchs and 69 % of Germans) view Muslims favourably and only 24% of French and Germans said that their attitude toward Muslims is unfavourable. (Stokes, 2.6 2015, Spring 2015 Global Attitudes Survey by Pew Research Centre). In addition, the supportive indicator number of vote for parties with anti-Islam rhetoric is used. Nevertheless, this indicator has only supportive character and it is not used in overall assessment because many limitation are connected

⁵⁸ See the subchapter Germany: Islamist terrorist attacks and terrorist attacks against Islam.

to it. Support of all three parties with anti-Islam rhetoric has risen rapidly since the beginning of migration crisis. This is caused by the current the massive numbers of Muslims immigrants coming to EU in recent years and not solely by the effectiveness of integration into the society. The biggest share of votes was gained by Swedish Democrats and the lowest by Front National. However before the migration crisis, the support of these parties was rather low. We might assume that it indicates attitudes toward current migration and not dissatisfaction with Muslims previously residing in country.

In conclusion, France appears to be the least effective in term of numbers of terrorist attacks. Swedish effectiveness is mediate with an exception of number of foreign fighters, in other words with an exception of preventing radicalization. On the other hand, Germany appears to be the most effective country in all indicators, except perception of Muslims by public. France performance in term of terrorist attacks is influenced by its foreign policy in Middle East and direct focus of terrorist on France and France is not always responsible for inability to counter terrorism⁵⁹

3.3 Overall assessment: convergence hypothesis and research questions

Convergence hypothesis has been confirmed but only partially. The typology which used three basic integration model is not applicable anymore. The segregative model (or contemporary differentiated incorporation as it is defined by Barša) do not longer exist in its pure form. Germany which was a main proponent of this approach, has reassessed its integration and immigration policies and currently accommodate some kind of hybrid type of integration policy.

All countries can be located on the axis assimilation and multiculturalism. Sweden still promotes multiculturalism but there are some tendencies toward assimilation (efforts to train Imams which would allow the state's control). However, Sweden clearly remains a multicultural country. France is located on the other side of axis and strongly promotes assimilation of Muslims into the French society and force them to accept the French universal values (e.g. secularity, republicanism). Germany has experienced convergence changed its integration type Now it represents hybrid type which incorporate both multiculturalism and assimilation.

⁵⁹ Terrorist attacks in November 2015 were executed by Islamist from Belgium

In addition, all countries have very similar residence permit and counter-terrorism policies (there are only few differences). The same could be said about Islam – state relation, all countries incorporated Islam into the existing framework under which other churches and religious organizations operate. But this means different approaches in all countries. French is more assimilative, German incorporates elements of all approaches (even remnants of former segregative approach – financing of Islamic organizations), and Sweden is influenced by its multicultural approach. Convergence has taken place from the two main reasons: membership in various international and regional organizations and commitment connected to this membership. The second reason is the similar reaction to similar threats and challenges in all studied countries. The new typology could be based on extent of multicultural and assimilative types in the country's policies towards integration of Muslims, Islam, and Islamist terrorism. Country could be evaluated on the basis of its preferences and policies. The pure type of multiculturalism stands on the one side of axis and pure assimilation stands on the other one. As we proved countries accommodate a both multicultural and assimilative measure, it only depends on the extent. Even France incorporated some measures which are distinctive for multiculturalism (e.g. construction of mosques).

Research questions: 1. Which country is the most effective and which is the least effective in integration of Muslims and countering radical Islam? 2. Is there any difference in effectiveness at all?

The thesis proved that there is a difference between Germany, France, and Sweden in effectiveness of integration of Muslims and approaches toward radical Islam. Nonetheless, the thesis is limited by the number of included governments' measures and inability to collect comprehensive data about Muslim's unemployment rate, number of Muslim politicians, and etc. because data are not collected on the basis of religion. Germany appears to be the most effective in terms of integration of Muslims and countering the radical Islam. Sweden and France performed similarly, both recorded some worse (number of terrorist attacks in case of France, number of foreign fighter in Sweden) and better results.

In comparison with other countries Germany might appear a less effective because comparison was only performed with relation to France and Sweden. The results of this thesis indicate that the best approach toward integration and radical Islam is combination of multicultural and assimilative measures. The application of these

approaches might vary from case to case and should be based on individual assessment of particular phenomenon.

Assessment of governments' measures on the axis multiculturalism – assimilation. In case of counter-terrorism, countries are ordered base on strictness and extent of counter-terrorism measures.

	Citizenship	Residence permit⁶⁰	Counter-terrorism legislation and measures⁶¹	Relation between state and Islam
Germany	Tendency to assimilation ⁶²	-	1-2	Multiculturalism with minor tendencies to assimilation and segregation
France	Assimilation	-	1-2	Assimilation with minor tendencies toward multiculturalism ⁶³
Sweden	Multiculturalism	Multiculturalism	3	Multiculturalism with minor assimilative tendencies

⁶⁰ French and German residence permit is not categorized because it more or less coincides with European and international framework.

⁶¹ Number indicates order of countries based on extent and strictness of counter-terrorist and counter-radicalization measures.

⁶² German approach is also more restrictive than French one but not so assimilative.

⁶³ Policy toward opening and building mosques.

The effectiveness of combating radical Islam and integration of Muslims into the society measured by following indicators

	Number of Islamist terrorist attacks	Number of terrorist attacks against Muslims⁶⁴	Number of foreign fighters⁶⁵	Positive perception of Muslims by natives in %⁶⁶
Germany	4 ⁶⁷	6	115,5	69
France	18	3	255	76
Sweden	2	3	399	No data ⁶⁸

⁶⁴ Period 2002 – 2014.

⁶⁵ Per million Muslims. Numbers are based on ICSR's estimates and Pew Research Centre's Forum on Religion and Public Life estimates of number of Muslims in Germany, France, and Sweden.

⁶⁶ Source: Spring 2015 Global Attitudes Survey.

⁶⁷ Including one failed attack in Bonn and one uncovered by rail workers.

⁶⁸ No comprehensive reliable data about perception of Muslims in Sweden.

Conclusion

The main aim of this master thesis was a comparison of approaches toward the radical Islam and integration of Muslims in Germany, France, and Sweden. As we highlighted in the first chapter, the countries have to cope with two types of challenges related to Muslims immigrants. The first challenge is the successful integration of Muslims and their incorporation into the majority society. Countries can use various measures to ensure successful integration of Muslim. This thesis has examined the following measures in every studied country: legislation framework which includes acquisition of citizenship and residence permit (especially permanent one), counter-terrorism and counter-radicalization measures with emphasis on Islamist terrorism and radicalization of Muslims, and relation between state and Islam.

The thesis has answered following questions: Which country is the most effective and which is the least effective in integration of Muslims and countering radical Islam? Is there any difference in effectiveness at all? Have integration types changed? How can we define new integration types?

The first two questions are related to effectiveness of integration and counter-radicalization. Based on the analysis of all three countries, the thesis claims there are differences in effectiveness of integration and counter-radicalization measures. The all three states performed differently. Germany appears to be the most effective country. The effectiveness was measured by the following criteria: number of Islamist terrorist attacks, number of foreign fighters coming from studied countries, perception of Muslims by majority population, and support of anti-Islam parties. Germany is ranked as the most effective because of its low proportion of foreign fighters among its Muslim population and small number of Islamist terrorist attacks. However the number of attacks was smaller in Sweden, some of the terrorist attacks were thwarted shortly before they were executed (e.g. explosives in the trains were discovered)⁶⁹ but these attacks were incorporated because they were thwarted only by accident. More or less Germany and Sweden performed similarly in term of Islamist attacks and their numbers are relatively low compared to France which experienced a lot more Islamist attacks (18 attacks during the monitored period⁷⁰). In term of counter-radicalization measures, Sweden's performance measured by number of foreign fighters per Muslim population

⁶⁹ See 2.1.4 Islamist terrorist attacks and terrorist attacks against Islam

⁷⁰ See 2.2.4 Islamist terrorist attacks and terrorist attacks against Islam.

was the worst (399 foreign fighters per million Muslims). Germany scored the lowest number of foreign fighters per million Muslims and French performance was mediocre. Relations between Muslims and majority society is reflected by the perception of Muslims by natives, support of parties with anti-Muslims rhetoric (Alternative für Deutschland, Front National Swedish Democrats), number of terrorist acts against Muslims. However, the poll about the perception of Muslims by natives were only available for Germany and France. Perception of Muslim in France and Germany do not differ significantly, nonetheless Frenchs have slightly more positive perception of Muslims according to Pew Research Centre's data. The support of anti-Islam parties is more or less same in all studied countries. However, the support of these parties was heavily influenced by the migration crisis and influx of Muslims to Europe. The Swedish Democrats gained the best results among all three parties but before the crisis their support was rather low. Hence we can assume that support of these parties reflects not only perception of Muslims but problems connected to the massive immigration of Muslims. The election results before the migration crisis indicate that all countries do not experienced significant anti-Muslims sentiments. In addition, Alternative für Deutschland was only founded in 2013.

Number of terrorist attacks against Muslims in all countries is rather similar. Both, France and Sweden have experienced three terrorist attacks against Muslims (in period 2002 – 2014). However, this has changed after the massive Islamist terrorist attacks in France (Charlie Hebdo, Paris attacks in November 2015) and France has experienced a wave of violence against Muslims. Unfortunately, there are not comprehensive data after 2014, yet. Germany has experienced 6 terrorist attacks against Muslims in period 2002 – 2014. However, many of these attacks were attacks on Turkish mosques and assailants were Kurds. We can assume there are not significant differences in perception of Muslims in all three countries. And all countries followed the same trend of worsening relations between natives and Muslims. This is even more evident in France in context of recent Islamist attacks with massive casualties.

In conclusion, Germany appears to be the most effective country. It performed better than Sweden and France in counter-radicalization (lowest number of foreign fighters per million Muslims), counter-terrorism (relatively low number of attacks), and it was average in incorporation of Muslims into the society (perception of Muslims and attacks against Muslims). Hence, we can claim that Germany's performance was the best among all three countries in general. Sweden and France performed similarly, both

recorded some worse (number of terrorist attacks in case of France, number of foreign fighter in Sweden) and better results.

The second two questions are closely related to convergence hypothesis. Questions are: Have integration types changed? How can we define new integration types?

The thesis confirmed the convergence hypothesis but only partially. The segregation type represented by Germany has ceased to exist and Germany has adopted both multicultural and assimilative elements in its integration policy. France has clearly remained an assimilative type and Sweden has sustained its multicultural approaches. Germany has adopted measures of both approaches and stands somewhere between the ideal multicultural and assimilative type.⁷¹ We can assume that there are two ideal integration types: assimilative and multicultural. In reality countries do not represent ideal types and can be defined as less or more multicultural, respectively less or more assimilative. For example, even France, as a strong representative of assimilative approach, accommodates some elements which are characteristic for multicultural approach (benevolent approach toward construction of mosques). The new integration types can be defined on an axis multiculturalism – assimilation according to the degree of accommodation of individual elements based on multiculturalism or assimilation.

Germany as a representative of hybrid integration type has achieved the best results in effectiveness of countering radical Islam and integration of Muslims based on our criteria. However, this thesis is limited by the number of examined aspects of integration and counter-terrorism. Further case studied might be needed to isolate other factors which influence the overall effectiveness and performance of countries (e.g. foreign policy in case of France – intervention against Islamists in Syria and Iraq and other countries).

The contribution of this master thesis is in the reclassification of integration types with an emphasis on Muslims immigrants and evaluation of effectiveness of approaches toward radical Islam and integration of Muslims in three selected counties which represent three different types of integration according to former typology (segregation, assimilation, and multiculturalism). At the same time, Germany, France, and Sweden represent three different types according to new typology introduced in this thesis (axis multiculturalism – assimilation).

⁷¹ See 3.3 Overall assessment: convergence hypothesis and research questions.

Summary

The master thesis offers the comparison of approaches toward radical Islam and integration of Muslims in Germany, France, and Sweden. These three countries represent three integration types: segregation (Germany), assimilation (France), and multiculturalism (Sweden). The master thesis suggests that these types do not longer exist and tries to prove convergence hypothesis and to measure an effectiveness of individual countries in countering radical Islam and incorporation of Muslims into the majority society.

The main goal of the thesis is the measurement of effectiveness of countering radical Islam and incorporation of Muslims. According to selected criteria, the thesis evaluates the effectiveness of all three countries and assumes that Germany is the most effective country. France's and Sweden's performance is similar, both countries have areas in which they perform better and worse. This finding answers our first two research questions: Which country is the most effective and which is the least effective in integration of Muslims and countering radical Islam? Is there any difference in effectiveness at all?

The next two questions are linked to the convergence hypothesis. Have integration types changed? How can we define new integration types? The convergence hypothesis was partially confirmed, all studied countries shows signs of convergence. However, France and Sweden have preserved their former approaches, they also incorporated certain common frameworks as a result of similar challenges and membership in international and regional organizations (especially EU). On the other hand, case of Germany confirms this hypothesis, Germany has become hybrid type of integration, and incorporating elements of multiculturalism and assimilation in order counter radical Islam and integrate Muslims. Hence, integration types have changed and this master thesis suggests new typology based on the level of multiculturalism and assimilation in their policies toward integration of Muslims (and other immigrants as well).

Acronyms

Common European Asylum System – CEAS

Coordinating Council of Muslims in Germany – KRM

Council of Europe – CoE

European Economic Area – EEA

European Union – EU

French Council of the Muslim Faith - CFCM

Global Terrorism Database – GTD

Global Terrorism Index – GTI

International Centre for the Study of Radicalisation and Political Violence – ICSR

Islamic State – IS

United Kingdom – UK

United Nations - UN

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Appendix

Appendix No. 1: Number of foreign fighters in Western European countries based on data from the end of 2014

Table 1: Western Europe

Country	Estimate	Per capita*
Austria	100-150	17
Belgium	440	40
Denmark	100-150	27
Finland	50-70	13
France	1,200	18
Germany	500-600	7.5
Ireland	30	7
Italy	80	1.5
Netherlands	200-250	14.5
Norway	60	12
Spain	50-100	2
Sweden	150-180	19
Switzerland	40	5
United Kingdom	500-600	9.5

Source: ISCR's estimates, Online: <http://icsr.info/2015/01/foreign-fighter-total-syriaraq-now-exceeds-20000-surpasses-afghanistan-conflict-1980s/> (Retrieved, April 2016)

Appendix No. 2: Number of Muslims in selected European countries

EUROPE

Number of Muslims in Selected Countries

Countries	ESTIMATED MUSLIM POPULATION	ESTIMATED PERCENTAGE OF POPULATION THAT IS MUSLIM	PROJECTED MUSLIM POPULATION	PROJECTED PERCENTAGE OF POPULATION THAT IS MUSLIM
	2010	2010	2030	2030
Austria	475,000	5.7%	799,000	9.3%
Belgium	638,000	6.0	1,149,000	10.2
Denmark	226,000	4.1	317,000	5.6
Finland	42,000	0.8	105,000	1.9
France	4,704,000	7.5	6,860,000	10.3
Germany	4,119,000	5.0	5,545,000	7.1
Greece	527,000	4.7	772,000	6.9
Ireland	43,000	0.9	125,000	2.2
Italy	1,583,000	2.6	3,199,000	5.4
Luxembourg	11,000	2.3	14,000	2.3
Netherlands	914,000	5.5	1,365,000	7.8
Norway	144,000	3.0	359,000	6.5
Portugal	65,000	0.6	65,000	0.6
Spain	1,021,000	2.3	1,859,000	3.7
Sweden	451,000	4.9	993,000	9.9
Switzerland	433,000	5.7	663,000	8.1
United Kingdom	2,869,000	4.6	5,567,000	8.2
Total for these countries	18,267,000	4.5	29,759,000	7.1

Population estimates are rounded to thousands. Percentages are calculated from unrounded numbers. Figures may not add exactly due to rounding. Table shows 17 of the 50 countries and territories in Europe.

Pew Research Center's Forum on Religion & Public Life • *The Future of the Global Muslim Population*, January 2011

Source: Pew Research Centre's Forum on Religion and Public Life: The Future of the Global Muslim Population, January 2011, Online: <http://www.pewforum.org/2011/01/27/future-of-the-global-muslim-population-regional-europe/> (Retrieved, April 2016)

Appendix No. 3: Number of mosques in selected European countries

The number of mosques in different European countries

Country	Population (million)	Immigrants (million)	Muslims (million)	% of pop. Muslim	Mosques	Purpose-built ⁹	Under construction
Spain	46	4.5	0.8–1 ¹⁹	2.2	454	14	none
Italy	59	3.4	1.3	1.9	661	3	5–6
Greece	11.2	1.15	0.2–0.3 ¹¹	0.4	< 400 ¹²	13	15 ¹⁴
Austria	8	0.7	0.4	4.8 ¹⁵	> 200 ¹⁶	4	2
Bosnia	3.8	1 ¹⁷	1.5	40	1,867 ¹⁸	1,472	
France	65	4.9 ¹⁹	5.5	8	2,100	< 200 ²⁰	60
Germany	82	7.2	3.2–3.4	3	2,600	66	200 ²¹
United Kingdom	61	4.8 ²²	2.4	4	850–1,500 ²³	9–20% ²⁴	
Netherlands	16.5	3.2	1	6	432	100	15
Belgium	10.6	1 ²⁵	0.4–0.5	3.5–4	330		
Sweden	9		0.35–0.4	3.8–4.4	> 50	6	1 ²⁶
Norway	4.5		0.12	2.5	120	3	
Finland	6		0.04	0.8	30–40 ²⁷	2	3 ²⁸
Denmark	5.5		0.2	3.5	115		

Source: Allievi, S. Conflict over Mosques in Europe: Policy issues and trends, p. 23.

Online: http://www.nef-europe.org/wp-content/uploads/2013/03/Conflicts-over-mosques_NEF-RelDem-RELIGION-MOSQUES-Final-1.pdf (Retrieved April 2016)

Thesis Project

Univerzita Karlova v Praze
Fakulta sociálních věd
Institut politologických studií

Master Thesis Project

Comparison of approaches to the radical Islam and the integration of Muslims in
selected EU member states



Master Thesis Project

Comparison of approaches to the radical Islam and the integration of Muslims in selected EU member states

Ivan Raffaj

1. Introduction

The proportion of the Muslims in Europe, especially in the countries of the former Western bloc, is rising. In some countries the percentage of the Muslims, as a share of the population, has reached more than 5%, in France the share of the Muslims is 7,5%. The EU is currently undergoing one of the major crises in its history and this crisis is directly caused by the massive migration, mostly from the Middle East. The contemporary crisis is dividing Europe and causing tensions within the EU, therefore the creation of the common migration policy or at least compliance on some basic procedures how to tackle the massive migration to the EU might be needed. The questions of successful integration and effective counter radicalisation and counter terrorism strategies are vital in the light of current development. The relevance of the topic can be demonstrated not only by the recent migration crisis in Europe but also by the riots which took place in isolated suburbs inhabited by immigrants in the European cities and as well by the terrorist attacks in the EU which have occurred in recent years.

2. Delimitation of the topic

This master thesis focuses on the integration of Muslims only in three EU member states (Sweden, Germany, and France) and omits the situation in the rest of the EU. The aim of the master thesis is not to offer the solution of the current migration crisis in Europe but only to measure the effectiveness of the integration and counter-radicalization in the selected countries. These three examples are supposed to represent the main integration types in the EU. We should take into consideration, as many authors argue, that the generalization and the creation of certain types of integration simplifies the complexity of the whole issue and omits the importance of national specifics. These types are sometimes considered as outdated because many countries passed the new immigration laws in past two decades.

2.1 Research aim and research questions

The aim of this master thesis is to point out how selected states cope with integration of Muslim and Muslim radicalization. The goal of the thesis is to compare individual strategies and to evaluate which ones of them seems to be more, or less effective in combating radicalisation and integrating Muslim communities in the major society.

Research questions: **1.** Is there any difference in the effectiveness of the integration and counter radicalisation in the selected countries? **2.** Which country is the most effective? **3.** What are the possible causes of effectiveness and ineffectiveness? (only preliminary question because it is highly interpretative and requires another in depth analysis – master thesis has only limited extent) **4.** Can we derive any types of integration based on these cases?

3. Methodology

The main method which will be used in this master thesis is comparative method. The thesis itself will be built upon the comparison of approaches toward Islam and integration of the Muslims in selected EU member states. Other methods will be used as supplementary to analyse the individual cases and to allow the comparison to be performed. Among others, analytical method and the case studies will be used, usage of these methods will allow us to study the individual cases and perform the comparison. The master thesis has no aspirations to engage in quantitative research but rather analyse qualitative aspects of selected cases, formulate similarities and differences, and draw a typology of various approaches towards the integration on the example of selected cases.

The preliminary independent variables are set as follows: **1.** The legal framework in selected countries – requirements to acquire the citizenship, work permit, and etc. **2.** The welfare state – variable will be examine if it has positive or negative effect on the integration (only after this examination, the variable can be used in this thesis), measured by the level of difficulty to benefit from the welfare system (the lowest criteria to benefit from the system). **3.** The selection process of the immigrants with regards to needs of hosting country's labour market (measured by conditions – selective or not selective - set by host country in order to ensured needed type of labour **4.** The counter-terrorist measures and related legislation (measured by the number of terrorist attacks and the number of successful attacks).

The dependant variable is called the effectiveness of integration which can be measured by the **unemployment rate of the immigrants**, the change of perception of the immigrants, and Muslims in general by native population with rising number of immigrants (measured by opinion pools), degree of isolation measured by the number of politicians (MEPs) from Muslim community, number of various organizations (formed by Muslim immigrants) taking part in public debates (to which extent are the immigrants part of the social, cultural, and political life of the hosting country), appearance of the isolated communities (isolated closed communities of mostly upcoming immigrants within the host country), willingness to join terrorist group measure by total numbers of foreign fighters (estimates by EUROPOL), and perception of the hosting country by immigrants measured by opinion pools.

More variables may occur during the thesis's research. The whole master thesis will be oriented on evaluation of the effectiveness of the integration of Muslim immigrants. The three cases will be examined closely based on previously mentioned independent variables and dependent variable – the effectiveness of the integration. The relationships between the variables will be scrutinized and evaluated if the independent variables have any meaningful impact on the effectiveness of the integration. To this point every case will be evaluated individually. After this analysis the individual case will be compared and their effectiveness in integration will be evaluated. Based on this finding we can distinguish between the most and least effective type of integration of Muslims and conclude which measures (independent variables) are the most effective approach toward integration.

3.1 Cases

The three cases were selected from all the EU member states. The countries which have only small Muslim communities were excluded. The selection of three following countries, namely Germany, France, and Sweden, is based on different type of integration and understanding of basic concepts such as nation state, citizenship and so on. Germany represents the notion of the nation state – exclusionist model. On the other hand, France promotes more universalistic approach which is based on the citizenship – assimilation type. Another approach is represented by Sweden. Swedish attitude is formed by welcoming immigrants and its extensive welfare – multicultural type. The selected cases are meant to represent the different types of integration (problems connected to this categorization are mentioned in part Delimitation of the topic) and

analysis and comparison of these cases should lead to generalization and application of acquired knowledge on all the countries within the type represented by the selected country. Therefore, we can evaluate the effectiveness of integration in various types, not only effectiveness in selected countries. Nevertheless, we must be aware of limitations of the generalization in this particular comparison and evaluation.

4. Preliminary structure of the thesis

1. Introduction – the characterization of the topic, the identification of the main points of our interest,

1.1 Theoretical framework and methodology – theoretical concepts, methodology (see methodology), identification of the variables, operationalization

2. Core

2.1 Analysis of individual cases – in depth analysis of the selected cases: Germany, France, and Sweden – work with primary sources (National Strategies)

2.2 Comparison – the comparison of the gathered information based on theoretical framework, and on the set of variables identified in the first chapter

3. Conclusion – confirmation or negation of the hypothesis (if applicable), answering of the research questions, qualitative evaluation of the results of the comparison

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