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## Integration models: multicultural and liberal approaches confronted

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Modele integracji: wielokulturowość a podejście liberalne

### ABSTRACT

European societies have been shaped by their Christian past, upsurge of international migration, democratic rule and liberal tradition rooted in religious tolerance. Boosting globalization processes impose new challenges on European societies, striving to protect their diversity. This struggle is especially clearly visible in case of minorities trying to resist melting into mainstream culture.

European countries' legal systems and cultural policies respond to these efforts in many ways. Respecting identity politics-driven group rights seems to be the most common approach, resulting in creation of a multicultural society. However, the outcome of respecting group rights may be remarkably contradictory to both individual rights growing out from liberal tradition, and to reinforced concept of integration of immigrants into host societies. The hereby paper discusses identity politics upturn in the context of both individual rights and integration of European societies.

**Key words:** integration, multiculturalism, liberalism, identity politics

### INTRODUCTION

Globalization processes have significantly changed socio-economic and cultural image of the world. Intensification of international migration has led to increasing ethnic and cultural diversification of societies in rich destination countries. Western European states host constantly increasing number of immigrants, and a substantial share of them originate in cultural environments that do not share common values with host societies. Diverse world and social life perception of people sharing the same territories leads to discordances that introduce social instability, shrinking sense of safety and provokes heated debates about future

shapes of changing societies. A need to work out a new model of integration of societies becomes more and more clear, both in countries that have already witnessed social anxieties and in countries, where future economic development is likely to trigger or strengthen immigration (Vertovec, Wessendorf 2005).

Multicultural concept of society, as a remedy to the said need, has been adopted by several Western European countries, with United Kingdom and the Netherlands being the most apparent examples. However, not very much attention is paid to fundamental differences between multiculturalism as ideology and centuries-long liberal tradition of European societies, that was based to a significant extent on tradition at least partly contradictory to values that form multicultural model of society. The main aim of the hereby paper is to confront multicultural and liberal approaches to society and point to inevitable consequences of adopting one of these models for integration of European societies.

### MODELS OF INTEGRATION REVISITED

Accomplishing social integration seems to be one of the most basic assumptions adopted by European states, quite often not even formulated *explicite*, but taken for granted. Then the debate moves to choice of model of integration that should be employed in particular circumstances to let achieve the goal that had been defined.

Monoculturalism as a model of full integration using the concept of adopting all rules of social coexistence of host society by immigrants, gained a lot of criticism to date. Although still practiced in France, by many was rejected as improper: "... assimilation ideology has been recognised as inconsistent with the principles forming the basis of a democratic state (...)" (Łodziński 2007, p. 9). Models of transmuting pot, melting pot and their derivatives are perceived in Europe as purely American, therefore not appropriate in European reality. Relatively young *Leitkultur* (reference culture) model that gained a lot of attention and discussion in Germany, where it was created (Tibi, 1998), already managed to unite opponents and gain negative reputation. Many suggested that the concept became a victim of political correctness of German political scene (Fukuyama 2006).

Therefore, the only concept that in most cases has had good press is multiculturalism, introduced, among others, in the United Kingdom and in the Netherlands. Already in 1991 the Council of Europe in one of its documents presented a vision of multicultural European society described with the use of such keywords as social integration, equality of citizens (equal chances for immigrants were emphasized), respect for cultural differences and prohibition of discrimination of immigrants in any form. Also numerous researchers in their works appreciated this model, e.g. having described Dutch society as multicultural without

being assimilative (Lijphart 2002) or creating ear-catching slogans like *many cultures, one state* (Bertossi 2007).

However, multiculturalism is not a univocally defined concept, but rather a collection of concepts derived from three main approaches. The first meaning of multiculturalism is a demographic and descriptive one, which is commonly understood as a description of ethnic, cultural, linguistic, and religious differentiation of societies. The second has clearly ideological and normative meaning, implying state ideology concerning maintenance of cultural diversity in a society. The last is a programme and political meaning, usually developed as a set of state policies heading towards creation of a unified institutional system respecting cultural differences and offering equal access for all members of society (Inglis 1996; Tiryakin 2003; Łodziński 2007).

#### MULTICULTURAL POLICIES: EXPECTATIONS AND RESULTS OF IMPLEMENTATION

Expectation towards successful implementation of multicultural concept are high. Kymlicka (1995) believes that it is a promising formula for social coexistence and enumerates its advantages. Among the most important there are capacity of avoiding social and ethnic conflicts, balancing social chances of host society and immigrants, and providing the latter with a chance to maintain their culture. In general, after an interesting and concise definition by Fukuyama (2006, p.14), multiculturalism may be outlined as "...a framework for coexistence of separate cultures rather than a transitional mechanism for integrating newcomers into the dominant culture". However, when it comes to defining operational shape of multiculturalism as a formula, not-yet-answered questions arise. It was interestingly commented by Jan Olbrycht, a member of European Parliament, who said that European multiculturalism is in the stage of "...concept creation while building process is already on" (Olbrycht, 2009).

Confrontation of high expectations towards multiculturalism with results of multicultural policies adopted in several European states disappoints. Impermeable city ghettos inhabited by immigrant communities, their high unemployment rates, low social position, permanent dependence on social services and disproportionately high criminality rates reveal that yet implemented programmes do not meet expectations. The Netherlands, where internal multiculturalism was successful in integration of people of various denominations (Catholics, Protestants, others) for centuries, in the last decades of the 20<sup>th</sup> century faced shift towards external multiculturalism, connected with high inflow of immigrants, and creation of pillarised society, which can hardly be explained as integration (Czubiński, 2009). Such situations prompt redefinition of multiculturalism as an idea, and trigger controversial, but reasonable comments like "multiculturalism is a complex of tensions" (Miczka, 2009).

Table 1. Examples of social cohesion manifestation in selected countries

| State                    | Examples of social cohesion manifestations   |
|--------------------------|--|
| The Netherlands          | <ul style="list-style-type: none"> <li>– each company hiring over 35 employees must report about its ethnic structure (since 1994)</li> <li>– job offers should be placed in minority-read press as well</li> <li>– equal treatment clause should supplement job offers</li> <li>– state help in language courses and vocational trainings for immigrants is guaranteed (since 1997)</li> </ul>  |
| United Kingdom           | <ul style="list-style-type: none"> <li>– an act enabling organisation of vocational training for underrepresented minorities (since 1974)</li> <li>– Northern Ireland: [1] each company hiring over 10 employees must report about its religious structure; [2] each company hiring over 250 employees must continuously monitor religious structure of its employees (since 1989)</li> <li>– accused immigrants from Muslim countries fall under codes of their country of origin (since 2006)</li> <li>– Pakistani parents are (<i>de facto</i>) allowed to send their children abroad during the school-year</li> </ul> |
| Poland                   | <ul style="list-style-type: none"> <li>– special electoral rights for minorities are granted</li> <li>– Tatar community may bury their dead without coffins</li> </ul>   |
| Germany                  | <ul style="list-style-type: none"> <li>– Muslim ritual cattle slaughter is allowed</li> <li>– Roma children are (<i>de facto</i>) excluded from school duty in several <i>Länder</i></li> </ul>  |
| Denmark                  | <ul style="list-style-type: none"> <li>– Kosher and Halal butchering is allowed</li> </ul>   |
| Canada                   | <ul style="list-style-type: none"> <li>– in Quebec, immigrants and Francophones are not allowed to send their children to English-speaking school</li> </ul>   |
| United States of America | <ul style="list-style-type: none"> <li>– “cultural defense” in criminal law (presentation of cultural evidence in criminal cases where both the defendant and his victim are from the same culture)</li> <li>– affirmative action (university admission bonus credits)</li> </ul>  |

Sources: Fair Employment Act, (available at Eurofund: <http://www.eurofound.europa.eu>); Fukuyama F., 2006, *Identity, immigration, and liberal democracy*. Journal of Democracy, April 2006, Vol. 17, No. 2, p. 5–20; Janicki W. 1999, *The distribution and significance of Tatar ethnic group in Poland, Region and Regionalism*, vol. 4, p.146–153; Lægaard S., 2009, *What does 'Respect for Difference' Mean?* Centre for the Study of Equality and Multiculturalism, University of Copenhagen; Nagle G., 2000, *Advanced Geography*, Oxford University Press; Song S. (2009), *The Tensions between Multiculturalism and Feminism: Another Look at the “Cultural Defense”*, Yale University (manuscript; available at [www.yale.edu](http://www.yale.edu)).

Situation in the Netherlands is to an extent similar to what has been observed in the United Kingdom. However, evolution of multicultural society and approaches to this issue has evolved over the last decades. This evolution has interestingly been commented by Vertovec (2005), who recognized four stages of its development. The first was called pre-multiculturalism, with much attention

paid to anti-discrimination of immigrants in the public sphere. It was followed by high-multiculturalism, understood as public recognition of immigrants and support for their organizations and activities. Then anti-multiculturalism occurred on the basis of growing conviction that cultural diversity of British society expanded too much. Post-multiculturalism, calling for alternatives for multiculturalism and for social cohesion is the latest stage (Vertovec 2005).

In almost any Western European country, and also overseas, there are plentiful examples of policies, legal regulations and social norms that promote social cohesion in various forms, although not always such label appears. Some examples of such situations have been collected in Table 1. In many cases they are directed to allow for cultural differences, usually rooted in religious differences. Quite often minority rights are protected, and immigrant communities are encouraged to participate in social, economic and political life of their host country to larger extent. However, some of the examples shown below may also prove, that vigorous promotion of either minority or immigrant community limits their participation in host society under the guise of protection of their customs and tradition; more or less formal acceptance of school duty violation in the UK or Germany may serve as an example. Also limitation of school choice to French-speaking schools, aimed at protection of French language in Quebec, prevents immigrants from entering the language mainstream in Canada.

There exist also cases when protection of diversity is *explicite* limited. In 1992 the Council of Europe excluded protection of immigrant languages from the European Charter for Regional and Minority Languages (1992). As language is one of the most significant elements of any culture, multicultural ideas are clearly contradicted with this decision of a body that usually supports multicultural ideas.

#### MULTICULTURALISM AND LIBERALISM: GROUP RIGHTS AND INDIVIDUAL RIGHTS CONFRONTED

In most cases minorities and immigrants appreciate adoption of rights that enable them to follow their habits and traditions, and demand for more, especially for formal group recognition. It is quite a natural consequence of adoption of multicultural policy, understood as respect for multiple groups co-forming the society. This follows *communautarisme* philosophy, holding that each person belongs to a group and is shaped by its culture, therefore a society is not a group of individuals, but a set of groups of individuals. Applied *communautarisme* allows each group (community) to use its own rules as long as they fall within the limits of public law. Existence of minority groups requires protection of their group rights with the use of anti-discrimination law, often commented as positive discrimina-

tion. However, preventing group discrimination usually creates multiple social categories, where members of mainstream group do not possess the same rights as minorities do. Hence, "...discrimination is a tool of fighting discrimination", as Szlachta has put it (2009). Therefore, multicultural policies emphasizing recognition of groups clearly go hand-in-hand with identity politics, aiming at protection of group rights, especially in case of groups assumably underprivileged of certain characteristics.

All in all, multiculturalism as a policy issuing rights to groups results in the fact that different people abide by different legal codes. Ebbe and Nielsen (2009) call it *multilegalism*, developed as no equality below the law. In this context, Fukuyama (2006, p. 15) argues, that everybody deserves being "...treated equally as individuals, not as members of cultural communities", while Laegaard (2009) poses an interesting question, whether existence of differences of legal treatment of different members of the same society means respect for difference or lack of respect for equality. Regardless of what is the answer to the latest question, a clear contradiction between group rights and equality of citizens arises.

Inequality of citizens below the law seems to be contradictory to one of the most basic provisions of European tradition. Contemporary Europe is a product of Christian past, democratic rule (equality and freedom of citizens), and of liberal tradition rooted in religious tolerance. Liberal concept of society as an alternative to the monarchical-clerical concept of the state (see e.g. Jeliński 2003) was founded on equality of citizens, equal worth and dignity of individuals, primacy for individual rights and personal liberty.

Confrontation of liberal tradition, where individuals and their rights are the most important reference, with multiculturalism holding that group rights and respect for difference are primary concepts, shows that it is impossible to respect both liberalism and multiculturalism at a time. Some researchers search for the Third Way, and it is usually found in so-called liberal culturalism. It aims at combining liberal principles of respect for individuals that are granted universal human rights (which is expected to allow equal participation) with specific rights created by the state for selected groups to allow promotion of their culture and identity and survival of minority cultures (Kymlicka 2001; Łodziński 2003). However, the most basic problems have not been solved yet. Isn't it that groups living alongside one another do not live together, but form pillarised society, that has not succeeded to date (e.g. the Dutch case)? How to protect group members against the group (e.g. how to ensure freedom of leaving the group)? How to ensure integration of society, when groups want to protect themselves against unification, create lobbies and fight for protection of their group rights? In many cases successful group protection leads to "overculturalization" of groups, and later on to exclusion, homogeneity and segregation (Kerckanen 2008).

Another important question is, whether feeling of inclusion and integration is the goal for members of immigrant or minority communities. Research done by Klvaňová (2009) provides interesting theoretical support for the answer, that this is not always the case. At the same time, integration of societies is widely declared as constituting one of the main goals of contemporary European states. Conducting integration against the will of those who oppose it will never be fully successful, but granting them with group rights on behalf of protection against unification means supporting their struggle against integration. On the contrary, if integration is the goal, these are individual rights that should be protected. With the lapse of time, individuals gradually lose symptoms of being strangers and groups they used to belong to lose their cultural distinctiveness.

## CONCLUSIONS

Liberal concept of society, founded on profound respect of individual rights and equality below the law inevitably results in gradual loss of cultural distinctiveness of minority groups. It leads to integration of society along its mainstream culture. On the contrary, multicultural concept of society, built around protection of group rights, leads to multilegalism. It facilitates maintaining cultural distinctiveness, but finally leads to creation of pillarised society, while integration fails to succeed. Searching for the *third way* seems to be creating delusions.

Consequently, before answering the question whether we want to follow liberal or multicultural model of society in European states, another question should be posed and answered: whether we want to accomplish well integrated, culturally relatively homogenous societies built upon centuries-old values, or whether we want to achieve poorly integrated, but culturally rich society built upon diverse values. Only after having answered to this question, discussion about adoption of liberal or multicultural model should follow.

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## STRESZCZENIE

Oblicze społeczeństwa współczesnej Europy i jej tożsamość zostały ukształtowane przez szereg czynników, wśród których można wyróżnić m.in. chrześcijańskie korzenie, gwałtowny wzrost intensywności migracji międzynarodowych, zasady demokracji oraz tradycję liberalną wyrastającą z tolerancji religijnej. Procesy globalizacji powodują, że Europa musi stawić czoła zupełnie nowym wyzwaniom, aby pozostać wierna swojej tożsamości. Dążenie to jest szczególnie wyraźnie widoczne w przypadku mniejszości, które z natury rzeczy usiłują zachować odrębność i powstrzymać proces wtapienia się w główny nurt kulturowy.

Systemy prawne poszczególnych państw Europy, a także główne założenia ich polityki dotyczącej zróżnicowania kulturowego w różny sposób ustosunkowują się do dążeń grup mniejszościowych. Poszanowanie dla praw mniejszości, wyrażane przyznawaniem specjalnych praw grupom mniejszościowym, jest najczęściej spotykanym rozwiązaniem, a jego efektem jest powstanie społeczeństwa wielokulturowego. Należy zauważyć, że końcowy rezultat prowadzenia takiej polityki może być sprzeczny z prawami jednostki, wyrastającymi z tradycji liberalnej, a także z jednym z głównych celów, jakim jest integracja imigrantów. Niniejszy artykuł zestawia prawa grup mniejszościowych z prawami jednostki i wskazuje na konsekwencje ochrony mniejszości dla procesu integracji społeczeństw współczesnej Europy.

**Słowa kluczowe:** integracja, wielokulturowość, liberalizm, prawa jednostki, prawa mniejszości