Framing Secular Women's Rights in Contemporary Britain and Beyond: Challenges and Implications

Martin Rosendal Ehlers

ABSTRACT

This thesis argues that a group of women from Muslim majority communities campaigning against Sharia law in Britain is challenging group rights multicultural discourse, and that this challenge is quite serious. The thesis' premise is based on decentering. Instead of looking at their campaign through the lens of multicultural theory, the campaigners are given the proverbial first and last word against their intellectual adversaries. This is done for the purpose of added value – there is limited literature in the field privileging this position. The theory used consists of frame analysis with added insights from critical theory and critical discourse analysis, as power and the concept of hegemony are central to the case. It is concluded that the way the women frame their campaign and their politics does indeed challenge group rights multicultural discourse.

Corresponding author: Martin Rosendal Ehlers (martinehl@outlook.com)
Department of English, Aarhus University

Table of Contents

Summary

This paper argues that the current secular women's rights campaign against sharia councils and religious group rights in Britain both challenges and is challenged by the multicultural discourse it engages with. The theory and methodology is primarily based on frame analysis, but also incorporates insights from critical theory and critical discourse analysis, which, while making many of the same observations as frame analysis, allows for a greater focus on exertions of power on the lexical level. While multiculturalism both as academic theory and policy has been under increasing strain in Britain in recent years, secular minority women's rights activists in Britain have been targeting defenses of cultural and religious rights, which they view as more condescending than helpful, since at least 1979.

More than merely attacking particular policies with which they disagree, the activists also argue that they have been betrayed by both the political and the academic left, which insists on seeing them as part of the Muslim community instead of as women from a marginalized ethnic group. They frame their fight in transnational and universal terms, rejecting that there is something particular about Muslim communities or people from them that should make them more or less compatible with secular human rights values. By extension, they argue that there is nothing wrong with demanding that Muslims in Britain adhere to secular human rights values, and that religious accommodation risks empowering patriarchal authority figures in minority communities. Instead, they believe that ethnic categories and gender should be the focus of rights policies. However, their rejection of the political accommodation of Islam resembles that of the far-right, and so they must walk a tightrope, simultaneously rejecting what they see as Islamic patriarchy and far-right racism.

In the academic realm, the multicultural discourse they oppose has developed a theoretical framework that challenges the claims of the activists. In this paper, this discourse is exemplified primarily by texts in the book *Is Multiculturalism Bad for Women?* and Tariq Modood's writings on secularism and religious accommodation of Muslim minorities. Many of the writers in the book frame universalist human rights, and particularly the idea that patriarchal cultures should be allowed to go extinct, as expressions of Western hegemony and colonialism. Modood is more nuanced in his critique, instead arguing that there is a radical secularism at work in Britain, and indeed that secularism is hegemonic in Britain, which unjustifiably curtails the accommodation of Islam in the legal sphere. In direct opposition to the activists, he argues that it is appropriate that "Muslim" takes the place of "South Asian" as the identity category to be the focus of rights policies.

The paper finds that the framing efforts of the activists provide a theoretical challenge to the multicultural discourse that they oppose, both through their case work with victims of British sharia councils, as well as through their framing of secular human rights as universally applicable. On the other hand, the paper does not claim to predict whether their framing will actually have a palpable political impact, as this is contingent on numerous factors that are not investigated in the present case.

Chapter 1: Introduction

In recent years, multiculturalism has become a hotly contested issue in the UK and the Western world in general. Rising awareness of minority populations living in isolation from wider society has become intertwined with increased fears of terrorism and immigration, and particular Muslim minority communities are being accused of not integrating well enough into the host society, and at worst of being hotbeds for violent extremism. While multiculturalism can mean many things, it is generally about recognizing the rights of different groups to have their differences recognized in different arenas, such as the legal sphere, so when certain differences become sources of fear, it naturally puts multicultural policies and discourses under stress.

At the same time, something curious is happening within the Muslim minority communities themselves. Increasingly, members of these communities are dissenting from common ideas of what it means to be a member of these communities, sometimes with forceful critiques of their communities. Even multiculturalism is not safe from this critique, however counterintuitive this may appear. After all, should people from marginalized minority communities not be the first to defend multiculturalism, to defend having their particular needs respected within the host society? But the most pressing needs may not be cultural at all, and sometimes certain cultural practices may even work against fulfilling these needs, such as in the case of gender equality.

Feminist critiques of multiculturalism emerging from minority societies are actually nothing new. The oldest group discussed in this paper is the Southall Black Sisters (SBS), and it was founded in 1979 to help women from Asian and African-Caribbean communities combat gender related violence. This has also involved criticism of culturally legitimized modes of behavior, and a focus on universal human rights. As religions are part of many cultures, and institutionalized religion can often be quite patriarchal, this has also included a critique of religion and a defense of secular spaces, where religion has no sway and no say.

A belief in the superiority and universal applicability of secular human rights values is at the heart of the minority women's rights critique of multiculturalism. It stands to reason that one of the sorest points for the people occupying this position is the concept of religious arbitration. After all, when the law becomes religious or takes religious sentiments into account, it means relatively less secular space. For activists from traditionally Muslim minority communities, such as the communities serviced by the SBS, this means a staunch resistance to any accommodation of sharia, the vaguely defined body of religious law used in in some versions of Islam.

On June 24 2016, then Home Secretary Theresa May launched an inquiry into sharia councils in the UK, which at the time of writing has resulted in SBS teaming up with two other organizations working with human rights issues within British majority Muslim communities to collect testimonials from Muslims who have had negative experiences with sharia councils. The first of these

organizations is Centre for Secular Space, an organization focused on creating spaces in majority Muslim communities where religion holds no sway. The other organization is One Law for All (OLA), which is dedicated to fighting sharia law, and any application of religious law for that matter. This group is led by Maryam Namazie, a British-Iranian member of the Worker-Communist Party of Iran who also heads the organization Council of Ex-Muslims Britain, which works to benefit and provide a safe space for former Muslims.

To raise further awareness of the negative sides of sharia councils, Namazie started a crowdfunding campaign to give British PMs copies of the book *Women and Shari'a Law* by the Muslim Swiss-Yemeni author Elham Manea. While primarily centered on British sharia councils, the book also contains an extensive and highly critical review of applied sharia from around the world, as well as an extended critique of what Manea calls an "essentialist" multicultural academic discourse, which focuses too much on cultural rights and not enough on individual rights. This joining of a critique of sharia with a critique of multiculturalism is shared by both Namazie and Patel, who, like Manea, believe that multiculturalism, both as policy and as academic discourse, has helped enable orthodox and patriarchal forces within Muslim majority communities.

I have chosen to center my research around Namazie, Patel, and Manea as they all present roughly the same criticism of multiculturalism, but do so from different positions. Patel is an activist who has long worked with minority women's rights on the street level, Namazie is an outspoken atheist and communist for whom a campaign against Islam in the public sphere can also be considered part of a broader political agenda, and Manea is an academic and an outsider, whose book engages directly with multicultural academic discourse, and whose work underscores the transnational aspect of the movement for universal secular human rights from members of majority Muslim communities. Taken together, their work gives a coherent, yet nuanced, perspective on this movement.

Namazie is also behind the internationally focused women's rights organization *Fitnah*, which between 2013 and 2014 published *Unveiled*, a magazine largely written by Namazie, along with the like-minded people she decided to interview, such as Patel. This magazine provides an insight into the ideology and the framing of the minority women's rights movement at work in Britain which is more directed toward consolidating the beliefs of people who are already supporters. Hence, it provides a more transparent look at the ideology behind the activists' framing than that targeted more toward the British public and politicians, as the activists have less need to accommodate how they communicate their views in the pages of *Unveiled*. Indeed, the interviews generally read like extended conversations on leftist ideology. *Unveiled* also adds to the understanding of the phenomena of women from Muslim majority countries expressing skepticism of multiculturalism transnationally.

So far, criticism of multiculturalism from Muslim majority communities has only been subject to limited academic attention, even as multiculturalism itself has been questioned on the very grounds that its adherents may not be paying enough attention to the rights of individuals (Susan Moller Okin

et al. 1999, Moira Dustin and Anne Phillips 2008). In this paper, I investigate how the minority women's rights activists frame their struggle in a way that both challenges and is challenged by academic multicultural discourse, and what the implications of this might be. I argue that parts of the academic vocabulary used when discussing the interaction between Western and non-Western cultures is stunted, and in need of revision, as it simply cannot accommodate the voices of these new actors without being conceptually stretched beyond the breaking point.

Multiculturalism is many things to many people, and can be understood as policy, as lived experience, or as a certain academic discourse. The activists and Manea focus their critique on what can be called cultural group rights multiculturalism. They engage in extended critiques both of concrete policy, but also of the theoretical underpinnings of cultural groups-rights multiculturalism, whether this be from academics or leftist political activists who support a greater role for Islam in the public space. Hence, I use the term "multicultural discourse" to refer to discourse which promotes a form of multiculturalism focused on supporting and enforcing the cultural rights of groups. The term should not be seen as referring to all multicultural discourse, merely that which is targeted by the activists and Manea, and hence used in this paper. I could also have employed terms used by the activists and Manea such as "cultural relativists" or "essentialists," yet these imply an inherent flaw in the arguments of the so labelled, and hence I chose the more neutral term "multicultural discourse."

For my theory, I draw upon both frame analysis and critical discourse analysis (CDA), along with the critical theory that informs the latter. Both theoretical strands essentially deal with how people talk about things, although they investigate different phenomena. CDA is generally used to discern how powerful actors naturalize their domination over marginalized actors, and analysis often focuses on the lexical level. Meanwhile, research in frame analysis has a long history of focusing on how social movement organizations, such as the SBS, present themselves and the issues they deal with. For example, how they interpret their grievances. Put in other terms, there is quite a lot of common ground ontologically, but less common ground epistemologically. In the present case they complement each other, as the frame analysis provides a framework for discussing how the activists enunciate their struggle, while CDA and critical theory provide the theoretical backing to discuss how the different actors define and exert power.

Despite focusing on Muslim majority communities, I do not engage in theology, and hence I make no distinction between religion and culture. There may be other cases where such a distinction is useful, but when it comes to social life, trying to discern what religion is, and hence where its influence begins and ends relative to the influence of culture, is a "jurisprudential red herring" (Celia G. Kenny 2014, 30). Neither do the activists and Manea appear to make this distinction, Patel arguing that, based on her work, there is "no neat distinction" (2008, 18). As one member of the British ex-religious youth organization Faith to Faithless explains, when her Muslim mother tells her not to talk

to boys, it could just be construed as Asian culture, but her mother also uses scripture to justify herself (Halima 2016).

The paper is divided into four sections. The first deals with the theory and methodology I apply. The second deals with the context of the framing efforts by the activists and Manea, and includes an overview of some of the research done on the British Muslim experience, as well as a short look at British sharia in practice. Having established this context, the third section reviews and analyzes the framing efforts by the activists and Manea, while the fourth reviews and analyzes examples of the type of multicultural discourse opposed by them. I have chosen to focus on two rather different examples here. The first is Okin et al.'s *Is Multiculturalism Bad for Women?* (1999) which begins with an essay by Okin critical of multiculturalism, followed by a number of, mostly critical, responses, and a final response by Okin. This provides a broad overview of the academic discourse that can be mobilized to defend group rights multiculturalism. Then, for a more contemporary and Britain-oriented example, I turn to the work of the esteemed British multicultural academic Tariq Modood. In both cases, a critical approach to the discourse provides a further understanding of the framing process of the activists and Manea, as it is not only their claims that are important to their framing, but also how it challenges their intellectual adversaries. Finally, I provide a short discussion of some of the main issues the activists and Manea raise in their framing. This section serves to investigate what resources the activists can draw on in their framing, both intellectually and empirically speaking. Simply put, I assume that it will help their framing efforts if academic elites agree with them, and if there are plainly presentable facts to back up their claims.

I now turn to the second chapter, where I present the theory and methodology I will be relying on.

Chapter 2: Theory and Method

2.1 Frame Analysis

The sociologist Erving Goffman's frame analysis has long been the basis of a strand of social science research that concerns itself with social movement organizations (SMOs) and how these seek to mobilize support by framing the problems they are dealing with in certain ways. In this paper, the theoretical basis in regards to framing will mainly be taken from the work of David A. Snow and Robert D. Benford, who were among the first to develop Goffman's concepts of frames as "schemata of interpretation" (Goffman 1986, 21) into a framework for dealing with social movement organizations. As defined by Snow et al., "By rendering events or occurrences meaningful, frames function to organize experience and guide action, whether individual or collective" (Snow et al. 1986, 464). Put colloquially, framing is fundamentally about getting people to see things your way and by doing so motivate them to act in your interest.

As many SMOs seek to change some part of society they feel is unjust, "grievance interpretation" is often the most important part of their framing. This takes place through the construction of an "injustice frame" which "defines the actions of an authority system as unjust and simultaneously legitimates noncompliance" (ibid. 467). To construct such a frame, SMOs can draw on the "core framing tasks," of which there are three. The first, diagnostic framing, concerns problem identification and attributions. In essence, assigning blame. The second, prognostic framing, proposes a solution and maybe even a plan of action, while the third, motivational framing, provides an impetus to action, which also involves the "construction of the appropriate vocabularies of motive" (Snow and Benford 2000, 615-17).

Of course, no SMO exists in a cultural or normative vacuum, and neither can their framing efforts. Hence, they must consider the master frames at play in a given context, which are defined as frames that are widely accepted, such as rights frames in most of the world (ibid. 616-19). To take an example from later in the paper, the activists are working within what we can consider a left-wing social justice master frame shared by parts of the left in Britain, in which the defense of marginalized groups is considered legitimate. However, they reject giving Islam any role in political or legal life in Britain, as they believe this is detrimental to women's rights, yet British Muslims are a marginalized group. As such, their framing efforts run counter to the master frame of those who should ostensibly be their closest allies, as it does not consider such an uncompromising rejection of the demands of a marginalized group legitimate.

Like any theory, frame analysis is not without its problems. Tautology is an issue, as the easiest way to do research is to look at successful framing efforts and then work backwards to discover why the SMO in question succeeded with its framing, and then finally posit a causal link between framing and successful mobilization (Benford 1997, 412). Benford also warns that framing researchers risk viewing SMOs in an anthropomorphic manner, as if they act as entities and not are not the result of the actions of people (ibid. 418). Benford notes that the tightrope of reification and reductionism can be "negotiated by focusing on human interaction, discourse, and the social construction of reality" (ibid. 420). And it is exactly its view of discourses as things which interact, interconnect, and struggle for meaning that enables critical discourse analysis, and the lessons of its failings, to add value to framing theory. Next, I provide a brief outline and discussion of the elements of CDA, and its parent theoretical branch of critical theory, which can add to our understanding of what goes on in a framing process. The intention is not to use the theory as a whole, but rather to implement some of the observations it makes that can add to our understanding of framing processes.

2.2 Critical Discourse Analysis and Critical Theory

The main thing lacking in frame analysis is a developed understanding of the role of power in discourse, and this is where critical theory and critical discourse analysis can provide some added

value. Within the framework of critical theory, there are many ways to understand and exert power, but for the purposes of this paper the important one is knowledge power, or "the relationship between the social consciousness of social actors and the reproduction of relations of power" (Mark Haugaard 2012, 42). Drawing on a multitude of theoreticians which have contributed to critical theory, Haugaard argues that this form of power "works by making certain acts of structuration appear reasonable because they are part of the perceived natural order of things" (ibid. 44). To take an example from critical discourse analysis, Fairclough argues that former Prime Minister Tony Blair manages to make globalization seem inevitable by presenting it as such in his speeches (2000, 27), a presupposition which removes a policy friendly of globalization from the realm of the political and presents it as part of the natural order of things. Informed by this concept of power, throughout this paper I will be looking for examples of terminology which asserts the relationship between actors and either includes them as legitimate voices or excludes them as non-legitimate.

To take an example I discuss in a later chapter, applying the term "colonialist" to someone who criticizes non-Western cultures is an act of structuration which places a person performing a certain action in a certain category, one which excludes the so labelled from being considered a legitimate contributor of meaning. We can consider the position from which this is done powerful if this act of structuration is considered part of the natural order of things, that is if it becomes the accepted view that the "colonialist" is not a legitimate contributor of meaning.

It is this awareness of vocabulary I borrow from CDA. Fairclough argues that the conceptual work of political language comes down to "working different vocabularies… together into new articulations, and thus producing new articulations of political themes i.e. new political discourses" (2000, 89). Note that this analysis of political language matches the observation made in frame analysis about the use of already existing stocks of meaning to produce new frames. Like frame analysis, CDA comes down to analyzing communication with the belief that there is some purpose behind it. This also means that my terminology would get too muddled were I to use both "discourse" and "frame" to refer to stocks of meaning that structure our way of looking at a subject in a certain way. Instead, I employ a more narrow definition of discourse as the putting together of a vocabulary, the totality of which constitutes a frame.

To take another example, the activists and Manea use a number of ways to describe their opposition. For Namazie, the elements of the political left which she believes pander to Islamists are "the Pro-Islamist Left" (Barnett and Namazie 2011), while for Patel, modern multiculturalism's focus on religious rights is "multi-faithism" (2008, 9-10). The construction of these categories I refer to as their discourse, while I refer to the overarching schemata of interpretation they produce as their framing and their frames.

There is one more concept from CDA that will be useful in the current context, which is that of hegemony. The archetypal power relationship investigated in CDA is that between a hegemonic

dominant discourse and discourses of resistance which struggle to define meaning against the dominant. The concept of hegemony is also referenced frequently in the multicultural literature, and to a lesser extent by the activists and Manea, so it is an understanding of power relations that will be useful to keep in mind going forward. To remain dominant, the hegemonic discourse, however unstable it may be, will seek to manufacture consent either through "concessions or ideological means" (Fairclough 1995, 76), and so it must be questioned and resisted.

This focus on domination and resistance in has led to a fair amount of critique of CDA. CDA research has been accused of relying on classically Marxist concepts, such as "false consciousness" and "resistance," which are both "tautological - neither can be proved or disproved as long as analysts assume that persons may not know or may falsify their intentions," and cut off from any way to empirically assess the actual intentions of actors, "the validity of the critique remains caught in the centrifugal force of the critic's perspective" (Sara Cobb 1994, 134). This issue of assessing intent is then further exacerbated by CDA researchers' tendency to view a given discourse as "anthropomorphic in its intent to dominate" (ibid. 135). In short, CDA, which does come out of the Marxist tradition (Fairclough 1995, 70), can be too ideologically frontloaded, while neglecting to properly consider the context of a given discourse (Chik Collins and Peter E. Jones 2006, 52). This critique is useful to keep in mind also because it can potentially be applied to other works which use the notion of hegemony and a domination/resistance framework.

A recent paper by Baumann casts some new light on this issue, and it does so specifically in the context of SBS's work in British South Asian communities. He does not work explicitly within a critical framework, yet his findings on discourse provide some added nuance to the current topic. Baumann's main thesis is that there are two equally effective discourses at work when it comes to ethnicity and culture in Britain, the dominant and the demotic (Baumann 2015, 209). Consequently, he starts from a different point than one would using a hegemony/resistance framework. According to Baumann, the dominant discourse is the one that is currently given the most credence in British society. This discourse conflates and ultimately equates ethnicity and culture, and "From the stylisation of 'ethnic' categories into 'communities', defined by a reified 'culture', protagonists of the dominant discourse" can then "portray minorities as forming ethnic-cum-cultural 'communities'." This, he argues, results in the simple equation "Culture = community = ethnic identity = nature = culture" (ibid. 213-14).

Baumann's charge involves conflating nature, understood as something at least quasi-biological, and culture. This is essentially the same charge Manea makes when she refers to the "essentialists," whose failings involve reifying Muslims and people from Muslim countries as some unified community (Manea 2016, 29).

The demotic discourse, on the other hand, is one which negotiates meaning without having to adhere to concrete notions of ethnicity and culture. It may be better dealt with in the plural, as demotic

discourses, but Baumann himself sees no importance in this distinction (Baumann 2015, 216). This is indeed a case where it is important to remember that we are merely naming observable social phenomena for the sake of being able to discuss them, and that we should be wary that we do not reify them. The point is that groups of people continuously renegotiate their identities, and that "An analysis of multi-ethnic alliances cannot usefully start from the assumptions of the dominant discourse" (ibid. 222). In other words, to understand what is going on when ethnically defined groups cooperate, we must try to understand the internal negotiations of meaning taking place within them and not treat them as homogenous actors.

The final concept from critical theory I include in the framework of this paper is that of ideology. I do not spend a great deal of time discussing ideology, but it comes up in regard to the activists and Manea as well as Modood, and so it makes sense to include a concise definition. I adapt the definition by Haugaard, who takes ideology "to mean a practical knowledge that legitimates certain forms of power relations and de-legitimates others," arguing that this being the case, "we can say that all actors are ideological" (2012, 44). The strength of this definition is that it is not normative, in that it does not consider ideologies good or bad, but merely facts of life. In the same vein, Van Dijk cautions that "it is a characteristic of ideological discourse to attribute ideologies only to our opponents and 'truth' to ourselves" (2006, 163). This definition is compatible with the Haugaard's definition of power since it is also based on structuration – the categorization of some things into legitimate categories and others into non-legitimate categories.

2.3 Summing Up and Choice of Literature

Frame analysis and CDA are related theories, in that they both deal with how actors negotiate meaning in the social world. The strength of framing theory comes from its well-developed framework for analyzing social movement organizations, but it lacks an attention to discourse and power, something which CDA can provide. They also share the danger of reification, and both in the sense that practitioners have a tendency to reify their central concepts, forgetting that they are really just ways of describing the actions of *people* and not things which act in and of themselves. Frame analysis also has a tendency to work backwards from successful framing attempts, which this paper avoids by looking at an attempt at framing the conversation on minority rights which so far has only had limited success.

When deciding which literature to focus on, I started with texts produced by the activists and Manea, and then found texts which resembled the multicultural discourse they oppose. This choice was informed by the goal of this paper to see how their framing challenges and is challenged by the discourse they oppose, and so I have consciously given the framing of the activists and Manea a privileged position. It is fundamentally an added-value oriented approach, as it has the added benefit of decentering the analyses away from established multicultural theory, to a perspective which has

been covered less in the academic literature. This also means that I will not provide an extended review of the current state of multicultural theory. It is, however, useful to have a baseline understanding of the state of multiculturalism, and so I begin the following chapter by briefly reviewing the development of multiculturalism in Britain, along with some developments in multicultural theory and criticism that is relevant to the present case.

Chapter 3: Background

3.1 Changing Views on Multiculturalism

Recent times have seen changes in the discussions in multicultural academia, reflecting the changes in multicultural policies over time. In the case of Britain, the 1970s were dominated by ethnic multiculturalism, focusing on culture and celebration of ethnic differences, while in the 80s this changed to equity multiculturalism, which focused on race relations and economic participation, and structural issues. The solution was employment equity and cultural accommodation. The 90s saw civic multiculturalism, focused on constructive engagement and a shared sense of belonging, while in the 2000s, there was more focus on accommodating religion along with an emphasis on rights and responsibilities, and intercultural dialogue (Martyn Barret 2013, 19). This last development is the same that Patel has dubbed "multi-faithism" (2008, 9-10). These two versions of looking at the development of cultural accommodation in Britain are essential to understanding the present case. One sees the current focus on accommodating people in terms of their faith as an evolution of multiculturalism that is more in line with the actual wishes of minority communities, which is the position of Modood, while the other sees it as an unfortunate deviation, as is the position of the activists and Manea.

Recent British administrations have also expressed frustrations with multiculturalism. In 2007, shortly before becoming Prime Minister, Gordon Brown wrote that "we are waking from a once-fashionable view of multiculturalism, which, by emphasising the separate and the exclusive, simply pushed communities apart" and emphasized his belief in reinvigorating a strong national identity, or "Britishness," in the population (2007). His successor David Cameron was even harsher in his judgement. In a speech held in Germany in 2011, he bluntly declared that the "doctrine of state multiculturalism" had failed, while also emphasizing the importance of a collective national identity (2011). Both of them made their declarations in the context of Islamic extremism, and so did current Prime Minister Theresa May when she held a speech in which she specifically mentioned sharia as an issue and warned that "We must not sleepwalk into separation, segregation and sectarianism" (2014).

In more academic circles, criticism of Multiculturalism in Britain is also far from new, partly because of a dilemma inherent to multiculturalism: being a liberal theory which promotes groups

rights, it can struggle with how to accommodate illiberal groups. In an analysis of the Rushdie case, in which there were calls for the banning of Rushdie's controversial novel *The Satanic Verses* from Muslims around the world, including some in Britain, O'Neill found that Kymlicka, Taylor, and Walzer, three strong voices in the field of multiculturalism, had all displayed poor "theoretical coherence" (1999, 223). All three are what O'Neill calls "strong" or "liberal" multiculturalists, meaning that they are willing to defend differential citizenship rights based on culture. In spite of this, they all ultimately came out in defense of Rushdie and against the banning of the book, although this position was not coherent with their own theories.

Banning the novel would have negated liberal autonomy, which was important to them all, a consideration which ultimately trumped other considerations of cultural recognition. O'Neill's conclusion is that "this type of liberalism is a perfectionist moral doctrine grounded on a commitment to maximizing a particular, culturally rooted, interpretation of the good life" which is hard to reconcile with practical politics (ibid. 249). Another criticism that has been levied at academic and popular discussions of multiculturalism is that they end up propagating an "essentialist" or "reductionist" view of culture, which ignores the "internal contestations" in cultures, while at the same time ordering them along a biaxial line going from "backwards to progressive" (Dustin and Phillips 2008, 408). According to this view, multiculturalism can end up being more patronizing than accepting.

One way forward that has been suggested is a shift from multiculturalism toward interculturalism, which is the position taken in a white paper published by the Council of Europe. It argues that "Whilst driven by benign intentions" multiculturalism is seen as having "fostered communal segregation and mutual incomprehension, as well as having contributed to the undermining of the rights of individuals," particularly women (cited in Kymlicka 2011, 212). The white paper considers interculturalism superior in that it "vindicates a common core which leaves no room for moral relativism" and acknowledges that all cultures are constantly in flux (ibid. 212). A later text released by the EU identify these non-negotiable values as "human rights, democracy, the rule of law, and the recognition that all human beings have equal dignity and are entitled to equal respect," and the way to engage with other cultures is considered to be through intercultural dialogue (Barret 2013, 26-27). As such, while acknowledging both the rights of individuals and the internal dynamics of cultures, it still focuses on cultures as the interacting units. Kymlicka argues that there is not really anything in interculturalism as a policy framework that is not already covered by multiculturalism and concludes that the differences are purely rhetorical (2011, 211). He concedes that it may be useful to adopt the term, but only because multiculturalism has been demonized so much in many countries that it has become a dirty word (ibid. 215).

Kymlicka also fears that criticizing multiculturalism risks legitimizing anti-diversity views (ibid. 214). This view is shared by Dustin and Phillips, who argue that the best way to avoid fueling bigotry while defending minority women's rights is to engage "with those organizations, mostly in

the voluntary sector, that can most legitimately claim to represent the experiences of minority women," such as SBS, who have helped the British state craft legislation targeting forced marriage (2008, 407-20).

To sum up, multiculturalism as politics is increasingly subjected to criticism in Britain and beyond, and other frameworks, such as interculturalism, have been nudging to take its place. The criticisms levied at multiculturalism include that it has ultimately led to more segregation and essentializing of cultures than inclusion, and that while its theoreticians provide admirable moral frameworks, these are too perfectionist for real world application. At the same time, a move away from multiculturalism risks empowering voices who are against diversity more broadly. The next section delves into the history of Muslims in Britain, along with the challenges they face in terms of defining themselves on their own terms. These challenges emerge from the political mainstream and the far-right, but also from within their own communities.

3.2 Islam in Britain

The debate about Islam and Muslims in Britain has long been one fraught with controversy, both in academia and society. This section will briefly outline the history and current status of Muslim immigration in Britain, before exploring some of the existing research on the public debate. Understanding the discourse about and history of Muslims in Britain is essential to understanding the social reality and cultural context within which the SMOs under investigation communicate and which existing stocks of meaning are available to them.

The history of immigration in Britain is also a history of empire. Britain has experienced significant immigration since the late 19th century, initially mostly from countries under imperial rule. Britain's empire and colonies may actually be part of the reason for the more developed multiculturalism in Britain, as colonial Britain practiced a relative tolerance towards its subjects (Panayi 2004, 468), although this tolerance should not be confused with actual respect (Said 1978). After the Second World War, many of the migrants to Britain came from the British Empire. Under the British Nationality Act of 1948, which had partly been enacted to attract workers to help rebuild the British economy, they now possessed British citizenship and the civil rights that came with it (Panayi 2004, 470-1). Of course, they still experienced racism from the majority white population of Britain.

The immigration from the colonies also meant an increased influx of Muslims to Britain, initially from the Indian subcontinent and Cyprus in the 1950s, from Africa in the 1960s, and from Iran and other areas producing refugees and asylum seekers in more recent times (Vellenga 2008, 453). According to the 2011 census covering England and Wales, Muslims were the second largest religious group of foreign-born residents, making up 1.4 million of the population, while 9 in 10 of residents identifying as Pakistani and Bangladeshi also identified as Muslim (Office of National

Statistics 2015). The total percentage of people identifying as Muslim in England and Wales was 4.8 percent, up from 3 percent in 2001, albeit any future growth of the Muslim population largely depends on future immigration and refugee policies.

Racism against non-white immigrants, who as a consequence of colonial history mainly hailed from Asia and Africa, prompted the Labour government of Harold Wilson to introduce the 1965 and 1968 Race Relations Acts, which sought to combat discrimination in such spaces as housing and employment, and established commissions to monitor discrimination. This tendency of institutionalizing opposition to racism continued throughout the decades since, and in 1999, when the Stephen Lawrence Inquiry revealed institutional racism in Britain and also introduced the term to the public discourse, police officers spoke out against a white backlash to the report and admitted the existence of racial discrimination (Panayi 2004, 472-3).

In a comparative study of British and Dutch public responses to Islamist extremist violence, Vellenga noted that while Dutch politicians reacted rather harshly with demands for more assimilation from Muslim communities, the speech held by then Prime Minister Tony Blair immediately following the 2005 London bombings drew a clear distinction between British Muslims proper and those who had perpetrated the violence, stating "it isn't an ideology, it isn't even a perverted fate, it is an indiscriminate attempt at mass murder" (Blair 2005 cited in Velenga 2008, 459). However, the public debate following the attacks also gave the far-right British National Party ample opportunity to intensify its activity, while opening the door for forward-looking Muslim groups to present their own visions for a multi-faith future. Still, there was mostly talk about, not from, Muslims as there simply was no Muslim "intellectual elite that could represent the Muslim community in the national public media" (ibid. 464). As such the public debate about just how the attacks should influence multiculturalism was dominated by Brits from the majority culture, not the people most affected by it.

While it might come as no surprise that marginalized minorities have less say in the public debate, it does have some serious implications. This is especially true when looking at the current debate over "Britishness," which has seen the national loyalty of British Muslims being called into question. Varun Uberoi et al. argue that journalists and politicians, through their control over the education sector, help shape how people view national identity (2011, 209). Based on interviews with politicians and analysis of newspaper coverage, they proceed to argue that politicians from both parties do not believe that all Muslims feel sufficiently British, while journalists as a whole propagate a concept of Britishness that excludes Muslims, including portraying the niqab as incompatible with British values (ibid. 214-220). These are both tendencies which can serve to make the popular and political climate unwelcoming for Muslims.

In a series of interviews with British Muslim elites, the interviewees also observed a change in the way Muslims are discussed in Britain, notably that the label "Asian" has lost content as a political

category and largely been replaced by "Muslim," which has also led to a racialization of Muslimness. This Muslimness is framed as in opposition to whiteness or Britishness (Waqar I. U. Ahmad and Venertia Evergeti 2010, 1697-8). A central point here is that we are still talking about the same individuals and the same communities now being primarily defined by their religion, not other possible identity signifiers. One of the anonymous politicians interviewed notes that he used to be identified as black, then Asian, then Muslim, then finally terrorist (ibid. 1703).

The interviewees also displayed a general dislike of politicians and the media presenting Muslims as some sort of homogenous community. They were, however, not the only ones who made this mistake, as one academic "feared that a homogenized, ahistorical and notionally global Islam may be emerging in pockets with dubious claims of authenticity, propagating an austere, restrictive, Wahabist theology" (ibid. 1702-6). Taken together, the interviews suggest that the identity of Muslims has developed over time, but also that the negotiation of what it means to be Muslim and the importance of that identity marker relative to others is continuously negotiated within Muslim communities. But despite this contested construction of Muslimness, individuals for whom "Muslim" may mean entirely different things find the notion of the "Muslim community" "uniformly imposed externally as a homogenous identity" (ibid. 1715).

However Muslims are portrayed, one thing that should be clear by now is that they are popularly considered as contrasting to a number of properties which they fail to possess. They are not British enough, they are not English enough, they are not white enough. In short, they are not normal. In interviews with 31 Muslim women living in London, several of the interviewees brought up issues of normalcy unprompted, but they also had different understandings of normalcy. They had to navigate at least two different conceptions of "normal," the one imposed on them by the majority society and the one imposed on them by their religion and culture. Clothing being so central to many Muslims' identity also played a role, as women who wear the hijab can make some people think that they are too Muslim, while making others feel that they are not Muslim enough, all depending on different versions of Islam (Louise Ryan 2011, 1049-57).

Particularly this last point is interesting. One women, a 40-year old community organizer from Afghanistan, decided not to wear the hijab because she associated it with the oppression carried out by the Taliban. This decision meant that she repeatedly had to defend her decision and assert her Muslimness to her fellow believers. Another interviewee, a Somali community activist, instead chose to wear both a hijab and "Western" clothes, such as pants and high heeled shoes, which also resulted in her status as a good Muslim being questioned (Ibid. 1055-6). Both women are essentially caught between different conceptions of normal, conceptions which also carry moral connotations. If they are "good" on one measure they fall short on the other. In some cases, Muslim and British, or at least broadly "Western," identities seem at least somewhat incompatible.

The struggle of these women to fit in provides a good example of why viewing minority issues in a binary dominator/dominated framework with the white majority culture as hegemonic may not be accurate in all cases. It is clear that among Muslims, there are many different ways of performing Muslimness and many ideas about how important doing so is. Exercises of power determining what is legitimate or not are exerted both on the communal and societal levels. That said, several of the interviewees feel targeted by the media, with three of them making deliberate attempts to show that not all Muslims are terrorists (ibid. 1050-52).

Regarding the labelling of Muslims as terrorists, a report from the Equality and Human Rights Commission suggests that the government's approach to counter-terrorism may be contributing to the disenfranchisement of British Muslims. The report finds that British Muslims and non-Muslims appear to experience the state's counter-terrorism efforts quite differently. While non-Muslims report not feeling much of an impact from counter-terrorism, "Counter-terrorism measures are contributing to a wider sense among Muslims that they are being treated as a 'suspect community' and targeted by authorities simply because of their religion" (Tufyal Choudhury and Helen Fenwick 2011, V-VI). This is a rather problematic development, and it is part of the reason why the British government's counter-terrorism strategy has been so controversial both in the media and in the literature.

Stefano Bonino argues that "The sanctioning of praise and glorification of terrorism under the Terrorism Act 2006 risks endangering individuals' freedom of speech and can easily fall into political manipulation" as what exactly constitutes "praise and glorification" is not clearly defined (2013, 386). Bonino also warns that when Muslim communities are talked about in terms of security, it ends up turning them into a suspect community, which means that simply being Muslim makes one a target of scrutiny (ibid. 390-2). Judging from the interviews discussed above, this is something many Muslims seem painfully aware of.

Before moving on to a short meta-discussion of the research outlined, and Bonino's paper in particular, it is worth expanding on this idea of Muslims in general being framed as a security threat. Stuart Croft suggests that the dominant power in a society can decide who should be protected and who should be controlled and/or feared (2012, 220). He never clearly defines what this dominant power is in the British context, but his focus on definitions of "Britishness" (ibid. 220) and communication by politicians and the media suggests that he is referring to the white, native born majority.

Croft's argument is that elites, and in particular those on the far-right, have stoked fears of an eventual Islamification of Britain, linking religious acts, such as wearing a scarf, with an identity incompatible with British values. This has the effect of "insecuritizing a whole identity," turning Britain's Muslim population into a group of scary "others" who not only fail to share legitimate values, but are directly opposed to them (2012, 230-32). The fear of Islamization is central to this

narrative. If Muslims are not only strange by way of their different values but actively seek to impose these values on the whole of Britain, they cease being merely curious. They become a threat.

This view of Muslims is also apparent in one of Britain's most prominent far-right movements, the *English Defense League* (EDL). Some adherents of EDL fear sharia law spreading throughout Britain and affecting them, while the movement as a whole espouses an "assertive cultural nationalism" that frames a civilized, white Western world as opposed to an intolerant and backwards Islam that makes little room for non-extremist Muslims (Andrew Brindle 2016, 453-456). As the section on One Law for All will show, it is exactly groups like this, which share their skepticism of sharia and Muslim political assertiveness but nest it in a xenophobic framework, the organization seeks to distinguish itself from.

Note, however, that it is not merely white elites who propagate the idea of British values being opposed to Muslim values. Croft also notes that Hizb-ut Tahrir at one point held a seminar discussing how a Muslim with British values and one with Islamic values would handle different situations, from buying a house to marriage (2013, 229). Indeed, if all believers of all variations of Islam could identify no difference between British and Islamic values there would be scant need for multiculturalism in this regard. Next, I will sum up the literature outlined above and provide a short critique.

There are certainly issues with how both the media, politicians, and certain political movements discuss British Muslims. British Muslims are presented as somehow in opposition to Britishness, to being part of the whole, a difference that is particularly felt by women, who often express their religion quite visibly through their clothing. But the notion that there are clear differences between Muslimness and Britishness does not only come from the white majority, but is also experienced on the community level by Muslim women, where it is propagated by other Muslims. Finally, that the externally imposed identity of Muslims has changed so much, from being identified ethnically to being identified by religion and in the worst cases as a security threat, not only shows how public perceptions of minorities can change. Even if defining Muslims mainly by their religion, their ethnicity, or some other particular identity maker can be appealing, the tensions outlined above could also function as a warning that researchers should not reify certain categories of people.

While it certainly important to deal with the adverse effects of the discourse of the powerful majority, if only for the simple reason that its members actually have the power to act on their prejudices on a larger scale, this can also lead to research based on a stark dominated/dominator binary, with the whole of the majority demographic being cast as the dominator. Bonino argues that the understanding that

> democratic states exert a strong social-controlling, unitary (this being
> sometimes too hastily labelled as "socially cohesive") and disciplinary action
> through the monopolistic mass production of meanings, processes of

subjectification and exclusive control over the limits of legitimate opinion fits extremely well within critical discourses aimed at understanding the social pervasiveness and political reconceptualisation of the post-9/11 nation state (2013, 387)

One would be hard pressed to argue against democratic states exerting some sort of social control through the cited means, but it would be facetious to claim that this cannot be said of most, if not all, states, and indeed any discourse community. The issue is that Bonino never qualifies this observation and merely lets it stand alone, suggesting democratic states, here meaning Britain, are somehow particularly malevolent. Clearly, the women navigating Muslimness and Britishness in London are exposed to many different influences, coming at them both from the majority population and their own communities.

Fittingly, the last section of this chapter outlines the actual practice of sharia councils in Britain, drawing mostly on research by Jessie Brechin (2013), but also including a paper by a member of one of the councils explaining his approach to divorce proceedings. This paper includes a second section on sharia councils which focuses on the research by the activists and Manea, including testimonials of people who have had negative experiences with the councils. However, that research is also part of the activists' and Manea's framing, and so that section appears toward the end of the following chapter instead of here.

3.3 Sharia in Britain

The first official sharia council in Britain, the Islamic Sharia Council (ISC) was established in 1982, and has since then offered mediation to British Muslims, although its primary function has been dealing with Islamic divorces (Islamic Sharia Council 2017). This does not mean that they necessarily deal with anything having to do with civil law at all. Although the Arbitration Act of 1996, which is mainly intended for financial transactions, limits the state's ability to interfere in arbitration decisions, it is possible to contract out of the ability to appeal the arbitration decision in domestic courts (Brechin 2013, 301-302). The other major sharia council in Britain, the Muslim Arbitration Tribunal (MAT), does practice legally binding arbitration, but still confined to the financial by the Arbitration Act. For example, it suggests that in the case of inheritance, the word of the council could be used in a civil court of law (Muslim Arbitration Tribunal 2015).

However little sharia councils may actually be able to legally enforce their advice and decisions, one must not forget that the people manning them hold significant sway in their communities, considering that they are able to initiate and end religious marriages. It can also be argued that the limited legal power bestowed to them vis a vis the civil courts does not mean that no legal pluralism is taking place. This is of course a definitional issue. According to Samia Bano, "legal pluralism

recognizes multiple forms of ordering and bodies of rules which may be central to the lives of individuals but which are not in themselves dependent upon the state or state law relations for recognition or legitimacy" (2009, 412). That is, while a sharia council's decision on what constitutes the best course of action in a given situation may not be legally binding in civil court, it can nevertheless be enforced by social pressure that goes beyond mere norms, since there is actually a body which purports to make decisions based on divine *law* involved. This, however, could only fall within the very softest definition of legal pluralism.

I will not engage in theological discussions about Islam and what would be an appropriate way to interpret and exercise sharia. Islam is a religion that has been interpreted and reinterpreted so many times that it would not be reasonable to claim that something "is Islam" sociologically speaking, and even then such a discussion would be beyond the theoretical scope of this paper. What is important is what is being legitimized by appeals to religion, so instead of looking broadly at what sharia law can potentially be, I instead use the procedure for divorce as defined by Suhaib Hasan in a paper he submitted to a conference on family law in Islamabad in 2014. Hasan is a scholar at the ISC in Layton, and so his definition of divorce procedures should be representative of those used by the council.

According to the process described by Hasan, the procedure for a religious divorce initiated by a woman is significantly more convoluted than one initiated by man. In the case of a male initiated divorce, the couple attends an interview to determine whether the man has already declared his intent to divorce by uttering "talaq" three times, which translates roughly to "I divorce you." There are a few other steps, but the process is largely unilateral. On the other hand, when a woman initiates a divorce, she must first submit an application containing valid reasons for the divorce, which the husband is invited to respond to, before entering into a mediation process where the council determines whether or not to grant her the divorce. Again, this is divided into a few more steps, but the main point is that the process is decidedly more convoluted and affords markedly less agency to the initiating party than is the case with a male initiated divorce (Hasan 2014).

There is one extra step to the proceedings that appear problematic in terms of gender equality. Hasan states that the civil courts will generally award custody to the mother after a divorce, but that even though the ISC is not permitted to deal with family issues, "it will ask the mother to sign a solemn declaration that she will allow the father to see his children under the terms of any court judgement" (Hasan 2014). This should be seen in the light of the fact that in the same paper, Hasan notes that in 2010, there were 116 applications for divorce made by men as opposed to 584 made by women, and the must numerous reason given in the applications was domestic violence, which totaled 199 of the cases (ibid.).

In her study of the application of sharia law in the UK, Brechin argues that there are both good and bad sides to the practice. On the one hand, sharia helps women because it makes decisions in their favor legitimate within an Islamic framework and the threat of going against them will anger

their god (2013, 299). As such, even if the procedure for a divorce is patriarchal, if the woman gets her way, there is the added benefit of her decision being legitimized by the religion of her community. On the other hand, to justify sharia councils within a liberal multicultural framework, the choice to use them must also be free. When a person lives in a community that enforces religious norms, the choice to use religious arbitration cannot be said to be free, particularly if that person works in the same community and could hence be out of a job if he/she is not considered faithful enough (ibid. 300). On the topic of free choice and coercion, she also remarks that

> It is not enough to rely on the assumption that no arbitration agreement or award that was so incompatible with generally accepted levels of gender equality and fairness would be enforced in the secular courts, because in many cases the factors that lead to the election of religious arbitration are precisely those that would stop litigants from appealing to the state system to enforce or quash a decision (ibid. 301).

In spite of this, Brechin concludes that any "coherent and convinced multicultural position has to embrace legal pluralism," but also that this would have to take place with greater regulation (2013, 313-40), which would be difficult under current conditions since neither the ISC or MAT publicize their records.

In short, the sharia councils' legal power is essentially limited to overseeing financial transactions, yet since they occupy a place of authority in their communities and their religious jurisdiction goes beyond their legal one, they still have the potential to wield considerable power, albeit on a local scale. In addition, going by the divorce proceedings detailed in Hasan's paper, they appear to have issues with gender equality. Indeed, this is one of the primary critiques leveled at them by the activists and Manea. In the following chapter, I review and discuss the framing work and research by the activists and Manea, both as it pertains to sharia councils, but also the much broader scope of their rejection of religion in the public sphere.

Chapter 4: The Activists and Manea

4.1 Namazie and One Law for All

One Law for All (OLA) was founded December 10 2008 on International Human Rights Day (Adam Barnett and Namazie 2011) and has been campaigning against religious arbitration in Britain since its establishment, with a particular focus on sharia law. The "About" section on OLA's website is straightforward with its criticism of sharia, with headlines reading "Sharia law is discriminatory," "Sharia law is unfair and unjust in civil matters," and "The voluntary nature of Sharia courts is a

sham" (One Law for All 2016). This suggests the first strand of OLA's framing, that sharia law and sharia courts propagate unequal treatment of women. On the one hand, they criticize sharia law in itself, claiming that "Under Sharia law a woman's testimony is worth half that of a man's; a woman's marriage contract is between her male guardian and her husband" (ibid.). In addition to the legal issues, they also claim that sharia councils are anything but voluntary, as "In reality, many of those dealt with by Sharia courts are from the most marginalised segments of society with little or no knowledge of their rights under British law" (ibid.). Note their use of the word "court" instead of "council," implying that sharia councils are capable of not merely mediating but of demanding certain things of their fellow Muslims. In other words, they frame sharia councils as being vehicles of coercion and social control against a vulnerable group.

This leads to the other part of their framing, which argues that "Sharia law doesn't promote minority rights and social cohesion" (One Law for All 2016). The organization outright dismisses the claim that "Sharia law is necessary to defend minority rights," arguing that it instead leads to the fragmentation of society and "segregation of immigrant communities," and "ensures that immigrants and new arrivals remain forever minorities and never equal citizens" (ibid.). The group rejects rights based on religious beliefs, stating that

> Rights, justice, inclusion, equality and respect are for people, not beliefs. In a civil society, people must have full citizenship rights and equality under the law. Clearly, Sharia law contravenes fundamental human rights. In order to safeguard the rights and freedoms of all those living in Britain, there must be one secular law for all and no Sharia (ibid.).

While it is not stated outright, the first sentence effectively argues for disregarding the group rights of religious belief in favor of individual rights, while the last cements the core of the organization's agenda, which champions the superiority of a universal, secular law for all individuals.

When the group aggressively frames minority rights as best fought for through the pursuit of individual rights, there is also an implicit criticism of multiculturalism. This is interesting coming from what is ostensibly a minority women's right group, but it is a view that is apparent throughout the group's communication. It also hints at the organization's transnational framing, also apparent earlier in the text when the group states that "Many of the laws that Sharia courts and religious tribunals aim to avoid have been fought for over centuries in order to improve the rights of those most in need of protection in society" (ibid.). While the organization was founded to combat sharia councils in Britain, it takes aim at orthodox Islamic influence in minority communities more broadly.

In her capacity as spokesperson for Council of Ex-Muslims Britain, Namazie has spoken in harsh terms about Islam at an atheist conference in 2011, where she called it "the religion of death" (Namazie 2011). It should be noted that she added that she believes that "In reality all religions are such, but most religions have been restrained by free thinking and freedom-loving humanity over hundreds of years. This one was never restrained, or controlled" (ibid.). Consistent with her work in OLA, she considers all religious intervention in people's lives bad, but Islam-inspired intervention the worst.

In an opinion piece in The Guardian, Namazie argues against people being called racists or Islamophobes for voicing "legitimate outrage against Islamism" (Namazie 2015). She puts this in a transnational perspective, mentioning Bangladeshi bloggers killed by Islamists and UK-based Bangladeshi bloggers having been placed on death lists. She makes a distinction between Islamism and Muslims, one being political religion and the other being personal, arguing that many Muslims are critical of Islamism, a difference the left does not see, as the only authentic Muslim to them is the Islamist. She, on the other hand, rejects what she considers a misguided "anti-colonialist" worldview which homogenizes Muslims and labels dissenters "native informants" or as "contributing to 'the demonisation of Muslims'" (ibid.).

Namazie instead views the conflict as global, between "theocrats and the religious right on the one hand, and secularists and those fighting for social justice on the other." Instead of helping in this fight, she argues, "postmodernist 'leftists'" practice "politics of betrayal" by denying universalism and "seeing rights, equality and secularism as "western." She suggest that Islamism "must be challenged by an enlightenment, not reformation," and that the left and its values must be reclaimed to fight for "social justice on multiple fronts – these include fighting against the religious right, racism and xenophobia, fascism of all stripes, the UK government's restrictions on civil liberties, as well as for free expression" (Namazie 2015). In other words, Namazie reframes the opposition to religious accommodation from an issue of minority rights into a broader political struggle which pits enlightenment values and secularism against a religious right.

These standpoints put Namazie and her organization in a conflicted political position. They consider themselves leftists, but their criticism of a, locally speaking, minority religion makes finding allies on the left difficult. Adding insult to injury, they find themselves criticizing many of the same things as the British far-right. In response to this precarious political situation, OLA has released both a report on what it calls the "pro-Islamist Left" and one on the far-right (Barnett and Namazie 2011, John Miller and Namazie 2013). The organization rejects the British far-right on the grounds that it, as opposed to them, is against Muslims and immigrants, while OLA is only opposed to politicized versions of Islam and actually consider Muslims at the forefront of battling Islamism (Miller and Namazie 2013, 64-65). In a press release on the same topic, Namazie rejects the far-right as

"xenophobic" and accuses them of "racist perspective that sees the teeming masses as the 'other' trying to change white, British, Christian culture" (Namazie 2014). She then writes that:

> people's "culture" is not based on their immigration or citizenship status. Not every white European represents enlightenment values – as the EDL [English Defense Front] clearly proves. Nor is every immigrant or minority a regressive theocrat. This is not about a clash of civilisations between a regressive "east" and a secularist "west" but a clash between theocrats and the religious-Right on the one hand and secularists and democrats, including Muslims and immigrants on the other (ibid.)

For Namazie, OLA, and, as I will demonstrate next, SBS, it is entirely mistaken to be centering the discussion on Britain. This is a transnational political issue, a clash of ideologies and of ways of viewing the world. Namazie's framing constitutes a radical decentering which fits poorly with both the far-left and the far-right in Britain. From OLA's minority secular women's right perspective, the EDL and Islamists, independent of nationality, belong to the same sphere, that of the far-right. The British and the Islamic far-right may have entirely different worldviews, but their categorizing of people into "cultures" and oppressing those who oppose them is considered the same. Next, I move on to the more locally oriented London-based SBS, which nevertheless also display a transnational awareness.

4.2 Patel and Southall Black Sisters

Pragna Patel has been published in academic journals discussing the history of Southall Black Sisters, the organization's mission statements, and the issues it has faced through the years. These articles provide good sources for discussing the framing work of SBS. According to Patel:

> Southall Black Sisters (S.B.S.) first set up in 1979, initially as a campaigning organisation comprising African-Caribbean and Asian women, in the midst of intense anti-racist activity. We consciously adopted a secular feminist identity, one based on a shared history of racism and religious patriarchal control. The absence of the recognition of gender power relations within the anti-racist movements and the absence of an acknowledgement of racism within white feminist movements had resulted in the invisibility of black and minority women (Patel 2008, 10).

The focus for SBS, in other words, is on gender and ethnicity, and this focus developed not only through experiences of violence and religious oppression, but because this intersection as a place for discrimination was overlooked by other groups. Along the way, SBS has been forced to reckon with growing fundamentalist Sikh, Muslim, and Hindu movements "in the U.K. and abroad," all the while resisting imposed "singular identities" applied to them by "the community, the antiracist movement and the state" (ibid. 10). While Patel does not completely reject multiculturalism, she does claim that, at worst, it can silence minority women, as they are identified primarily not through their gender, but through the religion of the community they are part of (ibid. 11). She lays part of the blame for this on modern multiculturalism, in which "differences are constructed in a stereotypical and essentialist manner, fixing and reifying boundaries of community affiliation," and part of it on what she calls the Blair government's move from multiculturalism to "multi-faithism," in which faith-based organizations were handed greater responsibility over community issues (ibid. 10-12).

Through the work SBS has done with victims of violence, Patel has found that "Dissent against religious conservatism is much harder in minority communities, because the most powerful community figures are usually religious conservatives" (Patel 2008, 18). Indeed, she cites one case where the group Muslim Parliament of Great Britain published a report on child abuse in Madrassas (Islamic religious schools), but the group was overlooked because they were not considered authentic enough (ibid. 18). The issue here is that authenticity essentially ends up being judged by how far the cultural or religious practice differs from mainstream majority culture, which by default will privilege more patriarchal and literal interpretations. Interestingly, Patel links this to colonial law, in which "the indigenous laws of the colonised country were codified with reference to religious texts but without reference to changing customs, practices and interpretations" (ibid. 12).

Patel is skeptical of what she views as the government's increased focus on "cohesion," which she considers just another word for assimilation, and she is also skeptical of the war on terror, which she views as having pushed the state toward this focus (Patel and Bard 2010, 310 and Patel 2011, 142). To her, the focus on increasing cohesion in faith communities is eroding secular spaces in which women and ethnic minorities can have their rights protected within the context of their gender or ethnicity. Instead, their plights are seen in the context of their faith community, an approach which assumes a cohesion and homogeneity within faith communities that the SBS has not observed in their work (Patel and Brand 2010, 310-1). Concerning the war on terror, she believes that the problem is not just that Muslims are being made a suspect community, but that the government's policies are too focused on promoting religious identity within public institutions to create preventative coherence (ibid. 310). In other words, Patel identifies oppression exercised not only by faith groups, but also by state policies which promote and legitimize them. Indeed, she is staunchly against cultural relativism, and considers the government's faith-based approach to multiculturalism racist, because it ignores

the struggles for universal human rights against religious laws abroad, instead homogenizing ethnicities under religious categories (ibid. 313).

Employing a concept from feminist theory, Patel instead argues for a greater focus on intersectionality, taking SBSs' own work focusing on "how racist nationality, immigration and asylum laws impact on black and minority women's experiences of domestic or gender-based violence and compound their vulnerability" as an example (Patel 2008, 22). To sum up, Patel's focus is on marginalized members of marginalized communities, and so her work inevitable involves negotiating the intersections of different sources of oppression. Fittingly, she also shares Namazie's rejection of using culture as the focus for rights on the grounds that this ultimately means empowering oppressive forces within marginalized communities.

Next, I review the vocabulary and framing in Fitnah, where Namazie, Patel, and other minority women's rights activists express their ideology in an explicitly transnational framework. While my focus remains on Namazie and Patel, I will also draw on the writings of other activists in the groups' material where it contributes to an understanding of the discourse of the secular women's rights activists' work in Britain.

4.3 Fitnah and Political Positioning

Fitnah is a London based but transnationally oriented secular women's rights organization with a particular focus on Iran, and is associated with the Iranian Worker-Communist Party. The organization's English website names Namazie as one of its leading figures, and she is the author of many of the articles on the site and editor of the organization's English language magazine *Unveiled*. *Unveiled* ran from 2013 to 2014 and contains articles posted on Fitnah's website, along with an editorial by Namazie in each issue, and can largely be considered a vehicle for her ideology as both a women's rights campaigner and a high-ranking member of the Worker-Communist Party of Iran.

The overall ideology presented in the columns of Fitnah largely resembles that of OLA and SBS, such as the universality of secularism and women's rights (Hajer Naili and Namazie 2013, 3) and the opposition to cultural relativism (Maryeme Hélie-Lucas and Namazie 2013, 4; Patel and Namazie 2014, 7). This should come as no surprise since Namazie is responsible for the majority of communication for both of them, but the issues also contain campaign issues specific to Iran, such as a campaign to allow female soccer fans onto stadiums (Namazie 2013, 11). On top of this, the middle of each issue is taken up by short reports on women's rights issues in a variety of countries, mostly in the Middle East. In the following, I draw mainly on the third issue of *Unveiled*, as this contains extensive text by both Patel and Sahgal, another prominent British activist and former Head of Gender at Amnesty International.

While the publications by OLA criticizing both the "pro-Islamist left" and the far-right make it clear that Namazie considers Islamism a far-right phenomenon, this ideological demarcation is much

more front and center in *Unveiled*, where the criticism is directed at the religious right in general, often within an explicitly Marxist framework. In Unveiled, Namazie identifies the foes as violent or oppressive religious organizations not just in Iran and not just in the Muslim world (Namazie et al. 2014, 19). Still**,** the focus of the criticism is overwhelmingly on Islamism, which Namazie claims "US-led militarism" has helped flourish (Hajer Naili and Namazie 2013, 3). In the second issue, the French-Algerian sociologist and activist Hélie-Lucas agrees with Namazie that the islamic veil is "the flag of the Muslim Far Right," and that leftists and feminists are mistakenly supporting "the oppressor" under the "politically correct pretext that US imperialism misused the defence of women's human rights to conceal its economic reasons for invading Afghanistan and that 'whites' are racists" (Hélie-Lucas and Namazie, 2013 2-4).

She explicitly places this argument within a Marxist framework, arguing that the choice to wear the veil or face the consequences is like the worker's freedom to work or die during industrialization (ibid. 4). Hélie-Lucas even goes so far as to compare the veil to the Nazi swastika, on the grounds that both may just be signs, and yet both carry particular political meanings (ibid. 7). Here, the public display of religious affiliation, regardless of context, is framed as a sign of oppression by default, not individual freedom to choose.

As in the case of OLA, the dangers inherent in their ideology and politics are not lost on the other writers in the magazine. Sahgal, who leads the British organization Center for Secular Space, also emphasizes the political aspects of their struggle, and the role of political positioning therein. Warning against working together with the EDL in their fight against Islamism, she writes that "Valuable work showing the damage done by Islamism – gender apartheid, sharia courts, etc. would be twisted into a fundamentally racist discourse" (Namazie et al. 2013, 7). The activists seem not only weary about their own political positioning, but they are also acutely aware of the importance of navigating the different discourses vying for legitimacy. The same awareness is on display when Patel argues that "the rise of religious identity" has become seen as "a counter hegemonic identity (ibid., 8). In other words, the behavioral codes which the activists see as hegemonic within their own communities are actually considered to be rejections of Western hegemony by a left which would otherwise be their political allies.

Sahgal puts the activists' issue with multicultural discourse in a historical perspective. Her perspective is that an entire generation of academics have become too caught up in "talking mumbo-jumbo," and that they are so caught up in postmodernist and post-colonial discourse that they cannot produce anything else (ibid. 2013, 7). She contrasts this to an older left that still remembers the virtues of universalism and "younger people who have come into politics through their challenge to religion on the one hand or fundamentalist organizations on the other" (ibid. 7).

Hélie-Lucas and Patel also warn against "Islamophobia" being invoked by Islamists when their political aims are questioned, seeing this as a way to shut down conversation about political Islam

(Hélie-Lucas and Namazie 2013, 6, Patel and Namazie 2013, 4). Patel further emphasizes the power of language, claiming that "This political use of religion has often involved the appropriation of progressive and secular language" (ibid. 2013, 2). Along with Hélie-Lucas, she also laments what they view as the Western-centrism of the left, and consider this to be behind the idea that secularist and human rights values are colonialist and imperialist constructs imposed on other groups (Hélie-Lucas and Namazie 2013, 7, Patel and Namazie 2013, 3-5). Like Patel, Namazie also frames colonialism as something more than a Western concept, referencing what she calls the Islamic "de-Africanising" in Niger and Mali, where she argues austere religious identity has usurped a secular, African identity (Namazie 2013, 18).

Taken together, the discourse and framing in *Unveiled* very much resembles that in OLA and SBS, down to the importance of political positioning. While neither OLA nor SBS hide the fact that they are left-wing organizations, this aspect is even clearer in *Fitnah's* communication, while the transnational focus of the magazine underscores their view that secularism and women's rights are not centered anywhere in particular. Meanwhile, there does seem to be some difference in the ways the activists articulate their view of their struggle as pertains to politics, depending on whether they are coming from a more transnational perspective like Namazie and Hélie-Lucas, or from a more domestic perspective like Patel and Sahgal. It is likely also a factor that *Unveiled* is much less outward-facing than the organizations' domestic British communication, and hence more focused on consolidating the ideology and framing efforts toward people who are already sympathetic.

While all of the activists mentioned here display a decidedly left-leaning political perspective, as would be expected in a magazine run by a member of a Communist party, Patel and Sahgal do not articulate their appeals in a way that explicitly draws on Marxist ideas for legitimacy. Meanwhile, the explicitly Marxist discourse and ideology of Namazie and Hélie-Lucas suggests that there is more than just the fight against specific politics at play here, but also a larger political agenda which is not immediately visible by simply looking at the communication by OLA. Such a clear political affiliation could prove delegitimizing on the British political arena, as the goals of the activists could be framed as a political power play. This is where Manea's support may prove valuable, as she is both Muslim and an academic, and not directly involved in a left-leaning political organization.

4.4 Manea's *Women and Shari'a Law*

This section outlines the arguments and the vocabulary of Manea's *Women and Shari'a Law*, including her conclusions. Manea's position relative to Namazie and Patel is that of an outsider, as she lives in Switzerland, and so Britain is not a place in which she usually operates, merely the subject of this particular study. She also doesn't engage in activism like Namazie and Patel. She is nonetheless in an interesting position vis a vis the two, as she uses both of them as sources in her study, and by way of Namazie having tried to get her book into the hands of British lawmakers. Fittingly, the

critique in her book goes beyond just the concept of religious arbitration, and ultimately resembles that of the activists.

Like Namazie and Patel, Manea's perspective is highly transnational, drawing on examples of institutionalized sharia from around the world. She explicitly does not engage in theology, but rather focuses on how religious laws have been used to justify various breaches of women's and human rights around the world. While most her focus is on various interpretations of sharia in the Arab world, she also targets Jewish personal law in Israel (2016, 78-80). Also, like Patel, she does not reject multiculturalism as a useful concept, noting that "It involves an acknowledgement of distinct cultural and group identities and the right to guard against cultural hegemony" (ibid. 11). However, she argues that the effectiveness of multiculturalism should not only be measured by how good it is at "combating racism but also inequality based on gender and class within minority communities" and she is afraid that it may reify "boundaries of community affiliation" (ibid. 11-12).

Manea believes that academic discourses sometimes fail to acknowledge their real-world effects, and so one of her main targets in *Women and Shari'a Law* is what she calls the "Essentialist Paradigm" both within academia and in popular discourse. Manea argues that its adherents "inadvertently articulates an ethnocentric obsession with their own 'self': the Western self. Ethnocentrism is a double-edged sword" (2016, 29). She critiques a range of authors, including such prominent figures as Charles Taylor and Modood, two significant voices on multiculturalism in Canada and Britain respectively. She provides four features of this paradigm, which I will outline in turn, as they really are central to her thesis. The first is the combination of multiculturalism with legal pluralism, by which she means institutionalizing cultural practices. This, she argues, ends up dividing people into boxes, treating them not in terms of their individuality but in terms of their group (ibid. 11-12).

The second feature, which extends from the first, is the focus on group rights, which Manea believes "justify the violation of human rights within minority groups as an expression of different cultural concepts of rights and justice." Here, much of Manea's ire is targeted toward Taylor, and through a reading of his literature, she hones in on those things which he considers to have value in terms of dealing with differences, namely authenticity and identity, both of which Taylor considers essential to a person's wellbeing, and by extension as things which should not be violated (ibid. 15-6).

The third feature is cultural relativism, in the analysis of which Manea continues her criticism of Taylor, this time of his claims that we should approach all cultures with the assumption of equal values, and that just as all people must have "equal civil rights, and equal voting rights, regardless of race or culture, so should all enjoy the presumption that their traditional culture has values" (Taylor cited in Manea 2016, 21-2). Manea responds that she agrees with the statement insofar as it accounts for individuals, but rejects it when applied to groups, as Taylor is doing. She cites an outlawed custom

in the Madagascan town of Mananjary, by which women must abandon newborn twins to die as they are believed to be cursed (ibid. 21-2), one of a myriad of examples, British and otherwise, she invokes while making her arguments.

The fourth feature is white man's burden, which is also quite possible the most controversial. Manea's argument is that some Western academics' sense of justice is too "intertwined with a strong sense of guilt and shame: the burden of Western hegemony and the colonial past" (2016, 29). Indeed, Taylor criticizes what he considers the arrogant imposition of values on some cultures by other cultures. He writes that "Western liberal societies are thought to be supremely guilty in this regard, partly because of their colonial past, and partly because of their marginalization of segments of their population that come from other cultures" and "Often, in fact, this presumption is correct" (cited in ibid. 29). She also criticizes Adamantia Pollis and Peter Schwab, authors of *Human Rights: Cultural and Ideological Perspectives* (1979), for their claims that human rights are not universal, and is in fact a Western concept which cannot be extended to non-Western or socialist nations (28, 2016).

Manea draws on other examples throughout her definition of the "Essentialist Paradigm," but the above captures the crux of her argument against the "Essentialists." Throughout her book, she articulates the issues of sharia law in Britain in many of the same terms as the activists, and she also draws on Namazie, Patel, Hélie-Lucas, and Sahgal to understand the issue. That is not to say that their ideology is the defining element in her conclusions, but that her work is certainly influenced by and reproduce the vocabulary and framing of the activists. Remarkably, she draws on Sahgal and Namazie, among others, when she argues that sharia councils should be seen as a security issue, as some of them have connections to extremist organizations (Manea 2016, 137, 174-5). She also articulates the struggle in terms of medieval values fixed against modern Enlightenment values, a view that is also present in *Unveiled* (Hélie-Lucas and Namazie 2013, 6).

As an extension of this, she considers sharia councils and the accommodation of religion in the legal sphere to not simply be the result of a wish for more inclusion, but as a manifestation of a particular political agenda that is tied directly to extremism, arguing that "there is no point in tackling the ideological jihadist message of political Islamism without confronting the religious message of societal Islamism" (Manea 2016, 144).

Manea's final conclusion is also one that falls comfortably within the universalist framework of the activists. As pertains to questions of culture and rights, she argues for a shift to a consequence-based approach that renders the discussion of whether human rights are universal or culturally determined null, as it will simply say that violating human rights is bad, and since violating human rights is bad, things that violate human rights are morally wrong (Manea 2016, 237). This approach to policy making completely rejects cultural relativism, as "bad" is only understood as bad according to secular human rights principles. Like Patel and Namazie, she also reframes colonialism, referencing colonial Britain's policy of treating Muslims in India as a separate electorate, resulting in

communal politics with one group not having to appeal to the other and the eventual fragmentation of society (2016, 164).

While this section has so far focused mostly on the discourse and framing by the activists and Manea in a broader sense, the next delves into their work in collecting and presenting information on the practice of sharia in Britain, including a campaign to collect testimonials from people who have had negative experiences with sharia councils.

4.5 Framing Sharia

OLA, SBS, and Center for Secular Space has collected a number of testimonials from people who have negative experiences with sharia in Britain as part of their submission to the Sharia Inquiry. They provide an interesting insight into how sharia councils and the interpretation of Islam they represent are viewed by some people in traditionally Muslim societies. At the same time, they can also be seen as an attempt at framing, as the activists are hoping to influence the perception of the legitimacy of sharia councils by providing cases which back up their claims. The testimonials are mainly from women who have negative experiences with British sharia councils, but they also contain criticism of what some of the testimonials describe as a new Islam that they do not recognize.

This is the case of a male immigrant from Pakistan, a father to a boy who decided to take a British convert as a second wife, making her wear the full veil and burka. The father cannot reconcile any of this with his own understanding of Islam, which he has from Pakistan, writing "Every member of my family is against any sharia court or council, Imam or cleric who preach this practice" (One Law for All 2016a). An important note here is that there is no way of knowing where this man's son got his religious marriage, but it is unlikely to have been in either the ISC or the MAT, as there is no evidence of either of them ever carrying out a polygamous marriage.

Another parent, an elderly Muslim woman and immigrant from Pakistan, writes that after her sons became increasingly religious, they took away her television and radio and made her daughters and daughters in law wear the hijab. She echoes the father's concern about a new Islam that she does not recognize from Pakistan. There are also testimonials from a mother and her daughter with Pakistani/Indian roots. The daughter wanted to leave an abusive husband, but ran into troubles when she attempted to leave him. In the interview, she was not allowed to represent herself or speak for herself, and the council ended up granting her ex-husband custody of the children, while denying the religious divorce. The daughter claims that the ex-husband later kidnapped and raped her.

Now, the actions of the husband may not be much of an indictment against the sharia council she was brought before in and by itself, but her mother explains how their initial reluctance to get a religious divorce got them ostracized and that five men from the community one day showed up at their door to convince them to go. In other words, the sharia council ended up functioning as an institutionalized form of social control within the community.

The examples given above lay out the most prevalent threads in the testimonials. Women are treated unfairly within the system, and the system represents a form of more austere Islam that is not only alien to the Muslims supplying the testimony, but which they see as something that has begun to affect their own lives. These sentiments are echoed by both the anonymous laymen and the few academics who have also given testimony, and what is interesting is not only their troubling allegations against sharia councils, which are frequently referred to as "courts," but that the criticism of the sharia councils are lodged within a much broader criticism of an emergent interpretation of Islam, the adherents of which have power over adherents of a different Islam.

This is an insight into the demotic discourse taking place within the, broadly speaking, Muslim community in Britain. Given that these testimonials have gone to an ongoing inquiry into the sharia councils, this is a conflict within a community (demotic discourse) often considered to have certain representatives and shared values (dominant discourse) that has the possibility of becoming more visible, questioning the assumptions of the dominant discourse. While it is not possible to say how much the testimonials will affect the wider public discourse, the fact that some of them are in video form is going to make them very hard to dismiss as fabricated slander.

It is not just sharia as an institution that is under attack. Manea's book provides an indictment of a person who serves at the ISC, Haitham al-Haddad. She argues that he is spreading a conservative, even extremist version of Islam under the guise of multiculturalism (2016, 154). Manea's example is taken from an interview dealing with Muslims in Britain. After al-Haddad says that multiculturalism means that Islam must officially be recognized as a religion in European countries and Muslim needs officially be taken care of, the interviewer asks him if that is not just getting Islam in the door disguised as multiculturalism. Al-Haddad answer is that he sees nothing wrong with that, and that he is tired of Muslims not admitting to wanting to see Islam spread over the whole world, "because justice will never be achieved unless the word of Allah is dominant" (cited in Manea 2016, 155-6).

In addition, Manea also covers a fatwa issued by al-Haddath, which states that the judgement of a civil court is not legitimate in regards to divorce, along with his view that Muslims ought to go against the laws of the land if the laws are un-Islamic (ibid. 97, 209). Adding this together with her broader attack on the spread of political Islam, it could seem as if Manea supports the view that the Islamization of British society as a whole is a threat. However, she also points out that even within British Muslim communities, Al-Haddad's views are extreme, as the Birmingham sharia council does in fact consider a civil divorce to also result in a religious divorce by default (ibid. 209).

Overall, then, like Namazie and Patel, Manea does not seem overly worried about the whole of British society being brought under the yoke of Islamism, instead focusing on the impact that it has on traditionally Muslim communities. Manea also demonstrates this in her warning that sharia councils stratify women into those who are equal before the law and those who are not – sharia, in other words, is viewed strictly as a threat to Muslim women (2016, 237). The distinction between this

framing of localized Islamization and national/global Islamization is important, because it renders a rejection of the Manea's discourse as xenophobic problematic because it does not locate the intersection of conflict as between the Muslim immigrants without and the white majority culture within, but rather the traditionally Muslim communities within and political Islam both within and without.

The thorough investigation that Manea makes into the sharia councils also constitutes an attempt at framing, as it seeks to define how to categorize and situate the phenomena of sharia councils. This is visible even at the lexical level, where she, like the activists and some of the testimonials, describes the sharia councils as "courts," instead of councils (2016, 174), which carries with it the presupposition that they have a certain legal power which the usual term "council" does not. This terminology is also invoked on the website of SBS (Southall Black Sisters 2016).

4.6 Summing Up the Vocabulary and Framing of the Activists and Manea

Perhaps the most important takeaway from the literature reviewed here is its rejection of a binary understanding of power relations, with either the West as a whole or a Western host nation viewed as the oppressor of non-Westerners. In the lived experience of the women themselves as well as in their research, the West or Western host-nations are not the primary antagonists, but rather actors within traditionally Muslim communities, be they Muslim countries or minorities within Western host nations. They also reject the view of colonialism in the multicultural discourse they oppose. Namazie believes it is hypocritical to only focus on Western colonialism, while Patel and Manea likens an accommodation of particular religious rights to British colonial law.

The overall perspective is not completely dismissive of multiculturalism, but rather of the way it is currently formulated and enacted. The activists and Manea appear to prefer a rollback to an earlier interpretation of multiculturalism that focuses on issues of ethnicity and race, instead of one that also seeks to accommodate religion, which they believe reifies cultural boundaries and ignores internal issues (Manea 2016, 239, Patel 2008, 9-10). Their skepticism, if not outright rejection, of religious accommodation is also apparent in their understanding of human rights as universally applicable *secular* human rights based on equality between genders and ethnicities with no place for religious authority (Manea 2016, 237, Namazie et al. 2013, 5).

Their case against sharia is also transnational in nature. Manea argues that authoritarian regimes such as those in Syria and Saudi Arabia exploit "legal pluralism to perpetuate the ethnic nature of their societies," calling this a "divide and rule strategy" designed to keep intact "their traditional base of power" (2016, 62). This view is also echoed in *Unveiled* in an interview with Kurdish-born Iraqi women's rights activist Houzan Mahmoud. She defines herself as "Kurdish, of course, Leftist and Internationalist," and argues that "People in Iraq are no longer citizens," as they are separated either by ethnicity or religion. When it comes to laying blame, she actually argues that "This liberal post-

93

modernist creation of so many values and identities has led humanity to a very tragic situation where we can no longer talk within the same religion" (Mahmoud and Namazie 2014, 8).

Politically, there is a clear left-wing agenda at play in the case of Patel, who criticizes both neo-liberalism and neo-conservatism, and Namazie, who is a card carrying communist, while Manea displays no obvious political leaning. The most interesting view that they all share as pertains to politics is a total rejection of political religion, which in the case of Namazie also constitutes her direct ideological opposition. This also manifests itself in an aversion to religious accommodation that covers faith schools (Patel 2010) and the veil. Manea, in fact, sees the decision to allow Sikh bus drivers to wear their turbans at work, and the subsequent decision to allow them to wear it instead of a helmet in 1973, as when things started to veer toward the "politics of difference," particularly since this eventually led to Sikhs being considered a distinct ethnic group with distinct rights under the Race Relations Act (Manea 2016, 44).

While they all share the same agenda on the topic of sharia and minority-within-minority rights, they are entwined in the issues themselves in different ways. Manea's position is that of an academic and a political commentator, and so she cannot really be said to represent any agenda outside of seeking to improve, by her own standards, the state of research and policy making. Patel is directly involved in helping abused women from minority communities, and her perspective reflects this – she seems mostly concerned with domestic British policy affecting the interaction between community and the state at the local level. Namazie's position is the most problematic, as her opposition to political Islam can be seen as part of the wider political struggles of her political party, and while she differentiates clearly between political Islam, or Islamism, and non-political Islam, she also displays an outspoken animosity toward Islam in general.

As I mentioned in the chapter on theory, I consider discourse, and hence vocabulary, to contribute to the creation of frames. A term like "gender apartheid" invokes the former regime of institutionalized racism in South Africa to frame sharia and the support of sharia as being much the same, albeit with gender taking the place of race. Using terms like "Pro-Islamist Left" and "Essentialists" to describe those who may have the best of intentions but end up playing into the hands of Islamists serve to frame ideological opponents as misguided and theoretically stunted. Patel also reframes modern multiculturalism when she labels it "multi-faithism," as it allows her to criticize policies giving religion more space in society as an unfortunate deviation from multiculturalism proper.

There are many other threads in the vocabulary and framing discussed here, but overall much of it could be said to draw from a social justice master frame, which should endear the activists and Manea to the political and academic left. However, there appears to be two particular cleavages between the activists and Manea and this master frame. One I will call the Universalism Frame, and one I will call the Islamization Frame. The Universalism Frame should be understood as a frame that

sees secular and women's rights, and any other legal or moral norm, as either universally good or universally bad. It refutes the ideas of cultural and moral relativism, in part because there is nothing for a good practice or a bad practice to be relative to; it is either good or bad. Hence, it also calls for a de-centering of the discourse on minority rights, based on the view that the fight for secularism and women's rights is being fought around the world entirely independent from some malevolent Western imperialist impulse. This is most visible in *Unveiled*, as well as Manea's extensive, and scathing, review of sharia around the world. In addition, in part using the vocabulary above, it frames the opponents of this universalism as either ill-informed or malignant.

The Islamization Frame frames the claims made by politically active Muslim organizations for group rights and political accommodation as not being merely part of an Islamic revival, but as the politically motivated spreading of a particularly austere and patriarchal manifestation of Islam. I refer to politically active Muslim organizations in general here, as the activists make no apparent distinction between Muslim groups with different beliefs or agendas. If a group of Muslims come together and make demands of political accommodation specifically having to do with religion, they are perceived to be Islamists. Recall that there is one important difference between the activists' framing of Islamization, and that of the far-right. In the activists and Manea's Islamization frame, Islamization is seen not as an existential threat to Britain, but merely as a threat to the wellbeing of disenfranchised groups in specific communities. Like the first frame, this frame is constructed both through the use of a particular vocabulary, such as calling sharia councils "courts," and through an extensive collection and publication of case work.

This concludes the chapter on the discourse and framing of Namazie, Patel, and Manea, as well as that of a few of the other activists writing in *Unveiled*. Keeping their framing in mind, we are now ready to move on to the next chapter, which critically examines two cases exemplifying the multicultural discourse opposed by the activists and Manea. The first, Okin et al.'s *Is Multiculturalism bad for Women?*, shows what can happen when multicultural intellectuals respond to views very similar to those discussed above. The second case concerns Modood's support of a greater role of religion in British public life, and both cases display the sort of vocabulary and arguments that can be mobilized by supporters of multiculturalism to oppose the framing of the activists and Manea.

Chapter 5: Multicultural discourse

5.1 Okin et al.'s *Is Multiculturalism Bad for Women?*

Okin et al.'s *Is Multiculturalism bad for Women?* shows that the issues dealt with in this paper have been debated for quite a while. The book also expands on and contrasts the activists and Manea's points by drawing on additional literature. Taken together, the responses to Okin's essay suggest a strain within multicultural discourse that draws heavily on the concepts of cultural group rights and

anti-colonialism. Okin et al's book is far from contemporary, yet its construction and its interacting writers provide a solid foundation for understanding some of the vocabulary that can be mobilized to defend multiculturalism.

What makes the book particularly interesting is not just the diversity of the reactions to Okin's essay. It is also the language many of the respondents use to critique Okin as they accuse her of a wide number of transgressions. The book is also interesting in that the debate that takes place in it is reflective of the issues faced by the activists and Manea. A woman asserts that there are some acts which cannot be excused by culture, and that cultures can even be judged normatively based on what they do, and the response, broadly speaking, is that it is not her place to make the claims that she makes. Keep in mind, however, that the critique of Manea at no point appears to be gendered, although it is remarkable that her only defenders among the respondents are also women.

I begin by giving a short resume of Okin's essay, before discussing the responses and what they suggest about the state of multicultural discourse at that point in time. The goal is not to thoroughly examine every response, but rather to find the common threads and instances of vocabulary which we can consider to fall within the multicultural discourse opposed by the activists and Manea.

Okin's essay asks the question: what should be done when the customs of minority cultures or religions conflict with the norms of gender equality of their host liberal countries, however little the liberal countries actually manage to live up to these norms themselves (1999, 9)? To provide an answer, she draws on a number of cases, one of which deals with the quiet legalization of polygamy in France in the 1980s, which did not see much political opposition until a group of journalists got around to interviewing the wives, and found that "the women affected by polygamy regarded it as an inescapable and barely tolerable institution in their African countries of origin, and an unbearable imposition in the French context" (ibid. 10). In other words, the voices of the women were not visible to the public until they were sought out, and it would likely have taken them longer to be heard without the intervention of the journalists. Hence, one of her conclusions is that policy makers should focus toward engaging with the women in minority cultural groups, and particularly young women, who have not yet been "co-opted into reinforcing gender inequality" (ibid. 24).

Okin, like the British activists of today, is mainly concerned with the "personal laws" in some cultures and religions, understood as rules that govern personal behavior and often have stricter rules for women than for men (ibid. 13). Part of her argument is that the difference between the public and the private – or domestic – spheres is less meaningful than one might think, as the more a culture demands of women in the domestic sphere, "the less opportunity they have of achieving equality with men in either sphere" (ibid. 13). Personal laws, as they determine what responsibilities a person has in the private sphere, inevitably impact that person's interaction with the public sphere. While there may indeed be some difference between the two spheres, they will impact each other, and hence no system of personal law that lays out unequal roles for the genders will have its effects confined to the

private sphere. This is also her critique of Kymlicka, as she argues that he fails to fully appreciate that much oppression is private (ibid. 22).

In his response, Kymlicka agrees that internal restrictions are not acceptable, but argues that external protections are important. These can take the form of such things as guaranteed political representation, compensation for historical injustice, or the regional devolution of power (1999, 31-2), but common to them all is that they are concessions made by the privileged majority toward a marginalized minority. In other words, groups should be granted protections against the economic and political power of the majority, but they should not be allowed to sustain illiberal internal practices. He further argues that just like feminists demand specific rights for women, such as gender-specific health programs, some cultures also need specific rights (ibid. 33-4). Kymlicka acknowledges that some multiculturalists have obscured "the older struggle for gender equality," but adds that some feminists have likewise "been blind to issues of cultural difference," and that it is important to fight both of these "liberal complacencies" (ibid. 34).

It is Okin's final conclusion that there is no intrinsic harm in a sexist culture going extinct (Okin 1999, 22) that motivates particularly spirited criticism in some of the responses. By the end of the responses, she has been accused of fueling xenophobia (Bonnie Honig 1999, 36), dismissed as speaking from a place of Western dominance and herself being patriarchal (Azizah Y. Al-Hibri 1999, 41, 45), compared to the man who introduced cocaine into Europe (in less than flattering terms) and effectively called an anti-Semite (Sander L. Gilman 1999, 53), accused of supporting Huntington's "Clash of Civilization" thesis and imposing hegemony (Abdullah An-Na'lm 1999, 59), accused of being colonialist (along with liberals in general) (Bhiku Parekh 1999, 69-70), labelled as patronizing and stereotyping (Homi K. Bhabha 1999, 82), and criticized for offending religious people (Martha C. Nussbaum 1999, 106). While some of these attributes are applied to her by more than one respondent, this constitutes a broad overview.

The major recurring theme is the inauthenticity of Okin's voice, as she is speaking from a dominant, Western perspective. Al-Hibri believes that Okin effectively argues for the imposition of Western values by force, whether this be against "immigrants or residents in their home country," and further accuses her of not having "learned the lessons of history, be it colonialism, imperialism, or even fascism" (1999, 41-45). Gilman's critique is in the same vein, although he even goes so far as to declare that, in regards to female genital mutilation (FGM), "Is it not clear that even sexual pleasure is as much a reflex of the mind as of the body" and that criticism of FGM is just a result of "Western, bourgeois notions of pleasure" and that "The question of pleasure should be left to the culture that defines it" (1999, 55-7). Parekh is also concerned with Okin's liberalism, as he perceives liberalists to be colonialist in their belief of their own superiority, and considers multiculturalism "a revolt against liberal hegemony and self-righteousness" (1999, 69-73), while Bhabha considers Okin's suggestion that the state should engage with younger minority to women, bypassing the

orthodox men likely to be in charge, as "divide and rule" (1999, 83). Overall, the vocabulary is strongly post-colonial, drawing equivalencies between Okin's views on culture and that of colonial Europe.

Among the respondents who see more eye to eye with Okin is Katha Pollitt, who bluntly states that "fundamentally, the ethical claims of feminism run counter to the cultural relativism of 'group rights' multiculturalism" since "multiculturalism demands respect for all cultural traditions, while feminism interrogates and challenges all cultural traditions" (1999, 27). While her characterization of multiculturalism may be a somewhat simplistic, considering Kymlicka's rejection of illiberal internal rights, it does allude to one of the major cleavages identified by the activists and Manea, which is that of group rights versus individual rights.

Pollitt also argues that cultural excuses only seem to work for people coming from the Third World, and accuses multiculturalism of "Third Worldism" and white liberal guilt, a view which resembles the activists and Manea's. Her criticism is that multiculturalism only seems to view some cultures as dynamic, while others are viewed as static, a standpoint that is ultimately less accepting than it is condescending (ibid. 28-29). This criticism is echoed by Yael-Tamir, who believes that "A great deal of paternalism is embedded in the assumption that while 'we' can survive change and innovation and endure the tensions created by modernity, 'they' cannot"(1999, 51).

Yael-Tamir argues that this issue of authenticity emerges because in multiculturalism rights are bestowed upon "the group," "internal schisms and disagreements are perceived as a threat to the ability of the group to protect its rights" (ibid. 47). An example of this would be the fear voiced by Babha above, that bypassing community leaders and instead engaging with young women would actually constitute strategy of divide and rule. Yael-Tamir addresses this when she notes that group rights are granted to preserve a group's culture, language, and tradition, which leads defenders of group rights to consider the most orthodox interpretation of a culture "authentic, unique, even natural" (ibid. 48). As a consequence of this, those who strive for social transformation and cultural reform "are perceived as agents of assimilation who betray the group and its tradition" who are "suspected of being motivated by narrow self-interest" (ibid. 48).

In Okin's response to the critique levelled at her, she writes that she does not view every bad act through the lens of culture or religion, but in fact acknowledges that socioeconomic inequality is also a major problem when it comes to securing women's rights (1999, 119). She also problematizes the idea of intercultural dialogue, not because she is opposed to it per se, but because she fears that if dialogue happens on the group level, it will be the orthodox leaders who get to speak for their whole community (ibid. 121). She also rejects a call to look at what the scriptures say, as to her it does not matter that the Qur'an may teach that all Muslims, despite their gender, are guaranteed freedom of conscience, if a country actually practices capital punishment in response to apostasy (ibid. 122). Recall that this is also the position taken by Manea. For both Okin and Manea, theological arguments

hold little value in sociological arguments, insofar as they only appeal to a something that can be interpreted (such as the Qur'an) and not the social fact of the interpretation itself (such as actions legitimized by reference to the Qur'an).

Okin rejects being a silencer of voices herself, instead accusing some pro-religious feminists, who enjoy freedom themselves while downplaying the patriarchy in their religions, of being the silencers (Okin 1999, 122-3). She finally reiterates that it is important to engage with the young women in groups, as they "tend to be the focus of intercultural disputes and to have most at stake in the outcomes," and are often at odds with each other (ibid. 126).

5.2 Summing Up and Analysis of Okin et. al

The issue with much of the criticism directed at Okin as colonialist oppressor is that it requires not only a rather selective reading of her essay, but in almost all instances, the critique assumes intentions that are not necessarily there. In addition, none of the texts clarify by which parameters one can be labelled a Western dominator and colonizer. The only parameter that is made somewhat explicit is the cultural: since Okin is from the West and hence part of the dominant culture, her claims carry in them all of the problematic history of Western civilization. It is, in other words, her being culturally located in the West that delegitimizes her claim-making in regard to non-Western cultures, understood as cultures originally from other parts of the world. This poses an interesting problem: under which conditions can a Western person write negatively about a non-Western cultural construct, such as a personal law or a custom, without being dominating, colonial, or any of the other labels which delegitimize that person's analysis? The critiques of Okin all fail to allude to an answer to this question. That is not to say that they do not also engage with her ideas, but it is always through the filter of her cultural heritage, which does seem to drive them to foregone conclusions.

The extensive use of concepts like "colonialism" and "imperialism" and their ties to Western hegemony constitutes a vocabulary which places certain perspectives in a larger framework, and most importantly a non-legitimate framework. It is also representative of an overall ontology which places the notion of universal human rights as an extension of Western hegemony, and assertions made from the hegemonic position as problematic. This understanding of the hegemonic position as non-legitimate is particularly interesting, in that if we extend our understanding of hegemony to allow for non-Western instances of hegemony located in non-Western localities and cultures, it follows that they would also have to be considered problematic. This is essentially what is happening in the discourse of the activists and Manea, when they focus on the power structures propagated by political manifestations of religion in the UK and elsewhere.

It is also through this vocabulary that criticism of non-Western cultures is attributed to causes and intentions that are not immediately apparent in the criticism itself. Okin and the authors supporting her do not suggest that what is Western is necessarily good, but rather that universal human

rights are. Yet, by interpreting Okin's position through the ontology and vocabulary outlined above, her belief in the superiority of universal human rights is interpreted as a belief in the superiority of the West, as according to the ontology, that is where the idea of universal human rights is located. Okin's cultural position is viewed through a particular frame that attributes colonialism and a Western desire to dominate as the real reasons behind the positions she takes.

An-Na'Im's accusing Okin of supporting Huntington's "Clash of Civilization" thesis is quite interesting as an example of this. Huntington's thesis suggests that human rights, democracy, liberalism, and political secularism are Western, and are opposed by an Islamic civilization which is incompatible with these values, to the extent that accepting them means implicitly converting to a Western civilization (Heiner Bielefeldt 2000, 91). This, however, appears to be quite the opposite to what Okin and her supporters in the book are suggesting, as they quite explicitly refute the exceptionality of Western culture by suggesting that people from other parts of the world are entirely capable of supporting secular notions of gender equality and other human rights values. On the contrary, the belief that Okin's suggestion of human rights as universal supports Western hegemony shares more of in terms of ontology with Huntington than Okin and her supporters do, in terms of considering secular human rights to belong to the West and their introduction to other cultures as Westernization.

Taken together, the perspectives outlined in the responses to Okin's essay display a strong focus on group rights. According to many of the respondents, protecting the rights of groups is just, even where the values enforced in minority-cultures may run counter to concepts of social justice within the host society. This is the first of the two frames prevalent in the multiculturalist literature reviewed here, which I call the Group Rights Frame. This is in opposition to the Universalism Frame of the secular minority women's rights activists, which Manea, Okin and few of the respondents in the book could also be said to be operating within.

The second frame is in part an extension of the first. I call this the Colonization Frame, which states that attempts by Western states to glorify or impose cultural values which work for them on non-Western cultures or minority cultures living in Western host countries is a continuation of the West's long history of colonialism and imperialism. In other words, it attributes a specific intentions to criticism of non-Western cultures. This frame stands in opposition to the secular women's rights activists' frame of Islamization, which sees the request for greater accommodation of Muslim personal law as a political and patriarchal project by an international Islamist right. Both boil down to opposition to the imposition of hegemony, albeit they locate it at different places.

As is the case of the secular minority women's rights frames, these frames are idealized, and are unlikely to correctly reflect the totality of the conceptual framework of any one multicultural writer. But, as I hope to have shown so far, they represent frames that are prevalent in the responses to Okin, and which the activists and Manea also identify as problematic within contemporary

multicultural thought. Neither should they be considered to represent the whole of the topics covered by multicultural academia, or even the literature reviewed here. They are merely meant to draw out and compare certain strands of interpretation that are relevant to the current case.

The second part of this section examines Modood's views on secularism and religious rights to understand how his understanding of religion's role in multiculturalism and society challenges, but is also very much challenged by, the framing of the activists and Manea. While the above outline and analysis of *Is Multiculturalism Bad for Women?* serves as a fine example of the multicultural discourse the activists and Manea oppose, Modood's writings provide a more recent example that focuses specifically on British Muslims.

5.3 Modood on Secularism and the Role of Religion

I now provide an extended critique of Modood's views on the role of religion in society and its detractors. The choice of Modood's work as the subject of this analysis is based on a few factors. Modood is one of the academics Manea charges with being an essentialist and a supporter of weak legal pluralism, in which religious authorities are granted limited control over their communities through, for example, religious councils (2016, 50). He has indeed advocated for more space for Islam, and religion in general, in public life, and, him being British, British public life in particular. In addition, it was possible to find a short series of exchanges based on a paper in which Gurnam Singh and Stephen Crowden criticize Modood, which means that it is possible first to provide an outline of his view of religion in society, and then see how he responds when it is prodded and questioned.

A 2009 text by Modood on the role of religion, and specifically Islam, in public life provides an interesting counterpoint to many of the standpoints of the activists and Manea, as he notes that Muslims in Europe contest "the primacy of racial identities, narrow definitions of racism and equality, and the secular bias of the discourse and policies of multiculturalism" (164). Modood argues that to accommodate Muslims, the British legal system must "embrace a moderate secularism" and resist what he calls a "radical secularism" which refuses any religious accommodation whatsoever (ibid. 164). This concept of "radical secularism" is central to his arguments for the accommodation of religion, and serves as an antagonist throughout the text. Recall that the early anti-racism and discrimination laws from the 1960s and onward dealt with ethnicity, not religions. According to Modood, this means that many Muslim activists feel misrepresented, as they would rather have their rights enforced as Muslims than as whatever ethnicity they may possess (ibid. 166-167).

He further argues that Muslims oppose multiculturalism "in its failure to distinguish Muslims from the rest of the 'black' population and its uncritical secular bias" (ibid. 173), a secular bias Modood ties to "the hegemonic power of secularism in British political culture" (ibid. 174). Instead, Modood suggests, to achieve religious equality, it is necessary to instead adopt a "moderate

secularism" which pragmatically allows for the accommodation of religion in the public sphere, including institutional adjustments for the purpose of religious equality (ibid. 180). Overall, Modood believes that the religious identity of Muslims can only be accommodated by allowing for greater religious influence in the public legal sphere. This puts him in direct opposition to the activists and Manea, albeit he also takes inspiration from feminism, arguing that the classic feminist slogan "the personal is the political" should also be applied in the case of religion (ibid. 8).

Modood advocates for multiculturalism as a "politics of difference" (ibid. 175) in which groups have their differences recognized in the public sphere. He recognizes that "it is clearly a collective project and concerns collectivities and not just individuals" (ibid. 175). However, it is also not blind to "colour/gender/sexual orientation, and so breaches the liberal public-private identity distinction" which Modood believes "prohibits the recognition of particular group identities" which otherwise results in citizens being treated "in a more or less privileged way or divided from each other" (ibid. 175). While Modood's understanding of multiculturalism is based on group rights, his perspective also does not recognize the separation of group rights from individual rights in the first place. It should also be noted that he believes that the accommodation of religion should happen dialogically, albeit he recognizes that there are "normative as well as practical limits," which include values like equality between the sexes, and other values "embedded in the political constitution, in specific laws and in the norms governing the civic relations in a society" (ibid. 180-181).

It is of course always impossible to give a fully nuanced summary of a text's arguments, presuppositions, and chain of reasoning without presenting it in full, but the above gives an overall outline of the positions adopted by Modood relevant to the current case. Next, I go through the reasoning he provides to reach his arguments and conclusions by analyzing the discourse of his text critically. This involves both going into greater detail concerning his chain of reasoning, and critically approaching his choice of language.

5.4 Analysis of Modood

While Modood at no point makes any charges of colonialism, he does employ the language of hegemony, albeit in reference to the phenomenon he identifies as "radical secularism." As such, he does not use the same vocabulary as the multiculturalists responding to Okin, but he still makes use of a delegitimizing label which allows him to largely limit his discussion to the conceptual level. He also proposes that not only is dealing with Muslims in terms of their ethnicity wrong, but that not considering their Muslimness as an ascriptive identity like gender or ethnicity is "sociologically naïve or a political con" (ibid. 176). By doing so, he defines the opposition to his arguments as either inept or malevolent, further questioning the rationality and hence legitimacy of the opposing viewpoint.

It should be noted that Modood is not the only one who has employed the term radical secularism, nor is he the first. A search for the term on Google Ngrams (Jean-Baptiste Michel et al.

2011) shows it being used as early as 1871, in a book discussing the role of religion and otherworldly phenomena in a time when scientific explanations were gaining ground on religious ones (Robert Dale Owen 1871, 215). A more recent invocation can be found in Herb London's *Americas Secular Challenge: The Rise of a New National Religion*, in which he argues that the rising influence of radical secularism in the West leaves it vulnerable to "the external threat of radical Islam" and "the internal threats of spiritual fecklessness and moral anemia" (2008, 1). He also argues that this radical secularism is "bolstered by the relativistic teachings of multiculturalism," and so positions himself quite opposite Modood (ibid. 1, 81). However, the fundamental view that there are arrogant secularists who fail to appreciate the positive contributions of religion in society is common to both Modood and London.

While Modood is certain that religion should be allowed more room in the public sphere, he admits that his approach involves a "suck it and see" approach to policy (ibid. 183), and so he does not engage with any specific cases with which to test the coherence of his theoretical framework. He does briefly engage with state policy, rejecting a corporatist model where the state essentially joins in creating a state Islam, but does not move beyond this (ibid. 182).

The premise of this rejection is interesting, however. He argues that it would be inappropriate for the state to impose "its own template, plans, modes of partnership and chosen imams leaders [sic] upon Muslims" (ibid. 182). Resembling the majority of responses in *Is Multiculturalism Bad for Women?* , the units of power here are the state which should not impose certain religious authorities and interpretations upon Muslims, and the Muslims in the position of the dominated. Modood does not appear to appreciate that this same argument can be made in terms of people, particularly women, from traditionally Muslim societies in Britain, who, as the testimonials referenced earlier show, do in fact have certain religious authorities and interpretations forced upon them, partly as a consequence of the government empowering faith leaders. The interaction which Modood opposes on the state/community level is at least partly responsible for a similar interaction taking place within the hierarchy of the community itself.

It should be mentioned that Modood has also displayed a more hardline position toward letting the state influence the role of religion in public life in another text. He recognizes the potential for coercion in places where sharia councils hold sway, but believes that rather than be made illegal, they should be brought within the law and be regulated and transparent. Otherwise, he fears that they will merely continue to function unregulated to the detriment "the vulnerable, especially women and children" (Modood 2008, 551). This suggests that despite his desire for more religious influence in the public sphere, Modood can hardly be accused of overt cultural relativism.

The central points to take forward into the following analysis of the debate between Singh and Cowden and Modood is that his arguments appear to depend on an understanding of power relations which sees Muslims opposed to a state which does not accommodate them enough. He attributes this

lack of accommodation to the hegemonic phenomenon of "radical secularism," and portrays the opposition to more religion in public life as ideologically motivated, which by his definition of ideology essentially means irrational.

5.5 Singh and Cowden's Critique of Modood

Singh and Cowden approach the issues facing multiculturalism largely on the same terms and with the same vocabulary as the activists and Manea. They argue against "the uncritical embrace by some progressives of ideas associated with postmodernist thinking" especially "anti-universalism and cultural relativism," which they believe have allowed fundamentalist religious forces to gain too much traction in British society, and argue for "a re-articulation of a new political discourse of egalitarianism which is unashamedly universalist and secular" (2011, 343).

They lament the growing focus on religion in multiculturalism, instead believing that it should "be understood through the lens of 'race' and nation" (ibid. 344). Their view of what multiculturalism should encompass is in other words narrower than Modood's. Their argument is that "the encouragement of a faith agenda has created a Trojan Horse in which religious fundamentalist groups have become increasingly influential in a range of public policy arenas" (ibid. 346), and "that religious fundamentalist movements need to be understood as *political movements* with very specific agendas," as opposed to just "benign community faith groups (ibid. 347)." These arguments, too, reflect the viewpoints of the activists and Manea, as the activists and Manea also support a focus on ethnicity over religion when it comes to helping the marginalized, and believe that multiculturalism has made it possible for fundamentalist religious leaders to gain power in minority communities.

They center their argument around a case where a young Muslim woman by the name of Shabina Begum had not been able to go to school for two years, due a conflict with the Denbigh High School in Luton's dress code, which prohibited her choice of garment. In accordance with her faith, she wore the jilbab, which is a long, black garment that only reveals the face and hands. This resulted in a lawsuit against the school, which concluded in Begum's favor, as the Court of Appeal assessed that the school had violated Begum's human rights (ibid. 348). Singh and Cowden do not actually take issue with this outcome, but they also reject seeing it as an outright victory for progressive values. They note that the school in question had a 75-80% Muslim intake, and that as part of the school's multi-faith policy, the girls at the school were allowed to wear both skirts, trousers, and the shalwar kameez (a non-religious garment which covers less than the jilbab), an accommodation to their uniform policy which had been made in corporation with pupils and parents, as well as "leading Muslim organisations" (ibid. 348). A representative of the school argued that the shalwar kameez had been chosen because "it was worn by different faith groups and it was hoped would *minimise difference* between them" (cited in ibid. 348, original emphasis). Begum, however, believed that the

shalwar kameez was against her religion and "normally worn by disbelieving women" (cited in ibid. 349).

Singh and Cowden have further reservations about the case as a victory for multiculturalism, and it is these that lead to their critique of Modood. They are not comfortable with the influence the fundamentalist organization Hizb-ut Tahir had in the case, noting both that Begum's brother was affiliated with them, and that they themselves acknowledged egging on the case, their women's representative saying "'We offered her [Begum] general support. She just needed encouragement" (cited in ibid. 351). In other words, Singh and Crowd problematize not so much the decision in and of itself, but the political agenda of which it became a part. This is also where their critique of Modood starts, with the charge that "What is (…) crucially absent in Modood's work is any sense of the different ideological thrust of these new faith based social movements," as opposed to earlier, secular movements calling for equality (ibid. 353).

They further charge that while it is clear that Modood does oppose "the extreme and reactionary elements within Islam" the same elements "are able to utilize the same arguments as he does against secular definitions of civil society" (ibid. 355). Here, they essentially mount the same charge against Modood that several of the multiculturalists responding to Okin did against her: that the discourse he gives credence to can be mobilized for less noble ends. While Modood's primary conceptual foe is radical secularism, theirs is cultural relativism, which they believe have led to "the postmodernist and postcolonial repudiation of Enlightenment traditions, of which secularism and universalism are amongst the most important" (ibid. 356).

In Modood's response to the Singh and Cowden, he rejects their claim that his approach erases secular spaces. He instead argues "that the primacy of religious identities is more authentic of some minorities, especially South Asians, than earlier impositions, such as 'black'" and "that this is the case is just a contingent fact about the minorities in question and how things have developed" (2013a, 122). In lieu of a theoretical framework which allows Modood to consider an individual to have multiple, conflicting identities which interact with one another within different power structures, Modood's view that groups can be identified by a singular identifier which can then claim rights relative to other identifiers means that he must remove one identifying characteristic from a group as a basis for policy (South Asian) to make room for another (Muslim).

Modood does not engage with the concrete cases in Singh and Cowden's paper, instead moving the discussion to the conceptual plane with a theoretical discussion of ideology and multiculturalism. On a slightly ironic note, he defines "ideology as social perspectives that oversimplify the world they are engaging with," (ibid. 123) before finally employing the concept of radical secularism to dismiss Singh and Cowden (ibid. 125-6). Note that this is also the rejection of his own view being somehow tied to ideology, which again supports the charge of him dismissing those who disagree with him as irrational, while defining himself as pragmatic. Recall the warning by van Dijk that we tend to view

ourselves as being beholden to the truth and others as ideological, or more simply, ourselves as arriving at our conclusions by rational means and others as arriving at theirs by irrational means.

In their response to Modood, Singh and Cowden argue that what "Modood fails to consider is the nature of the religious movements and organizations that claim to represent these concerns," again citing the involvement of Hizb-ut Tahir (2013, 129-130). They further argue that the contradiction in Modood's position is that it would support Begum's demand as religious accommodation, while ignoring that is based on a version of Islam that "is based on the specific rejection of the very kind of 'multiculturalism as dialogue' that Modood is arguing for" (ibid. 130).

Their argument is that while a multiculturalism based on religion is divisive, the secular identity "black" was able to unite oppressed people across cultural, ethnic, and geographical separations, and that this secular black identity came under attack in the Rushdie affair (ibid. 130). They specifically cite the counter-demonstrations against a protest calling for the banning of Rushdie's book by the minority women's rights organization Women Against Fundamentalism. They note that during this counter-demonstration, "these women were vilified as 'whores' by many of the demonstrators, and the implication of this abuse was that secular feminism, as well as other secularist and 'Western' ideologies, had 'corrupted' these women" (ibid. 131).

In light of this, they ask Modood what he sees as non-ideological religion, while noting that a 2008 London event set up to promote non-ideological manifestations of Islam supported by then Mayor Ken Livingstone actually featured people who had provided theological support for suicide bombers (ibid. 132). They believe that this reveals struggles concerning how to bring Islam into the public sphere, and their "concern is that [Modood] fails to recognize hegemonic struggles taking place in religion" (ibid. 133).

In his response to this, and the last response on this article, Modood insists that Singh and Cowden are radical secularists, based on their belief that the British government has been too uncritical about the growing influence of fundamentalism and their overall skepticism of religion in the public sphere (2013b, 135). He believes that their position "uniquely problematizes religion," and compares religion to homosexuality to make his point, arguing that a homosexual man could simply choose to "stay in the closet" and not "make his sexuality a basis of his politics, but that it is also his democratic right to be part of an "assertive gay pride movement" (ibid. 135).

Finally, Modood includes in his charge of radical secularism against Singh and Cowden that their critique of the fundamentalists calling for the banning of Rushdie's book means that they consider all people who attacked the novel fundamentalist and hence are simplifying religion in an ideological manner (ibid. 137). This requires a very particular reading of their response, and it is also inconsistent with his own view that it is radical secularists who divide religious people "in terms of ordinary believers and fundamentalists," particularly when he himself notes that all movements have their extremists (ibid. 137-8). He also never addresses the abuse perpetrated against Women Against

Fundamentalism. Instead, he dismisses their response as "a shallow, prejudicial, knee-jerk 'anti-fundamentalism'" (ibid. 138).

Arguably, protesting against a manifestation of religion which prompts people to call other people "whores" is a questionable definition of knee-jerk. This follows the pattern of Modood's chain of reasoning in the texts discussed here, which partly rests on delegitimization of other views through the application of a vocabulary (radical secularism, ideology) which rejects the rationality of his opposition while naturalizing his own positions. Thus he shares the tendency to rest more on delegitimizing concepts than concrete examples of lived experiences with some of the multiculturalists responding to Okin. Another aspect he shares is that he believes that religion may be the most authentic way to define some ethnic groups, as shown by his own example drawing on South Asians. Tied to this is his belief that the state should not impose secularism on religious people, although by contrast he does not engage with the issue of religious authority figures imposing a certain religion on the communities in which they have sway.

However, even though this means that Modood fails to engage with power relations beyond the state/group level, he does not do so through a post-colonial lens, so it would be remiss to simply consider his discourse a continuation of the strain in Okin's book. Still, as I have shown, his basic approach to arguments, his reliance on delegitimization and his failure to engage with power relations beyond the state/group level do largely resemble it.

As I noted at the outset of this section, its purpose was to provide a consciously critical reading of one of the most prominent figures who deals with multiculturalism as it pertains to British Muslims, and the role of religion in society in general. Modood is entirely correct in claiming that there is an ideological secularism at work in Britain. The section in this paper on the discourse of the activists proves as much. However, in the case of the delegitimizing labels, Singh and Cowden simply provide a much more empirically robust definition of their cultural relativism than Modood does of his radical secularism. In the case of ideology, it bears mentioning again that Modood is mistaken in dismissing other views as ideological while presenting his own views as non-ideological. This is not simply a semantic issue, as it implies fundamentally that he is rational and the others are not and hence makes presuppositions about the quality of either sides' arguments.

In the last chapter before the conclusion, I will discuss how some of the issues the activists and Manea engage with are challenged by the multicultural discourse they oppose. The first section concerns concepts such as "native informant" and "imperial feminist," vocabulary which frames dissidents from majority Muslim communities essentially as race-traitors. Following this, I will discuss the empirical backing for the idea of secular human rights as universal, using historical research and the example of a women's rights campaigner in Morocco, as well as the issues with trying to apply intersectionality in a dominant discourse which fundamentally operates with cultures

as discrete groups. Finally, I briefly discuss the inherently political nature of the activists and Manea's campaign before moving on to the conclusions.

Chapter 6: Discussion

6.1 Native Informants

In this section, I discuss the issue of the voice of the women's rights activists, both by drawing on the sources I have used so far, but also by introducing a few new ones along with examples of situations where the legitimacy of their voices have been questioned to assess how this may affect their framing efforts. I begin by providing an argument against Modood's claim that Women Against Fundamentalism (WAF) acted in a knee-jerk manner when going against what they perceived to be fundamentalist tendencies in their communities.

The agenda and grievance interpretation of WAF closely resembles that of SBS, as is evident by a shared report from the two organizations to the Commission on Integration and Cohesion arguing against faith schools (2007). In the report, they write that communities should not be considered "the natural building blocks of society," and argue against "a cultural relativist approach" to policy that ignores the marginalized groups in minority communities (2007, 4-25). The report also frames secularism as part of the solution to combat racism and fundamentalism, calling these "two of the most divisive trends in British Society," while rejecting the portrayal of human rights as "British or even Western," as "Otherwise, they become markers of exclusion rather than inclusion," generating the view that immigrants "with their negative and alien values" are "responsible for divisions and are harmful to the stability and 'cohesion' of the country" (ibid. 1-2).

They also provide numerous examples to back up their arguments, from a 2006 report about physical abuse in madrassas being largely ignored, to a Hindu religious school working with fundamentalist texts and Christian schools teaching creationism during science classes (ibid. 20-25). One can certainly disagree with the uncompromising nature of their views, such as the claim that separate prayer rooms are "over accommodation," but the point is that there is nothing shallow or knee-jerk about the organization. Like, and in accordance with, SBS, it uses empirical examples to take a number of ideologically coherent positions, which are, unsurprisingly, in line with the general ideology of the activists and Manea. In light of this, Modood's claims about the organization are doubtful, although his analysis of the secular movement as ideologically motivated is correct, if simplistic.

One of the issues that minority women's rights activists, secular or otherwise, face is that their voices are not considered authentic enough when it comes to matters of religion (Patel 2011, 150). British Muslim activist and human rights campaigner Sara Khan argues that there is a "hierarchy of oppression in the minds of some within academia, and among liberal and left-wing commentators, in

which women's rights (Muslim in particular), are placed on a lower rung to Islamophobia" (with McMahon 2016, 139). The criticism she levels at this group is the same that can be levelled at many of the respondents in Okin's book, and for her it comes from a personal place, as her and her organization *Inspire* has actually been working with the British government's anti-extremist Prevent program, and so she has experienced being called an Islamophobe, a sell-out, and a native informant herself (ibid. 21). Khan's frustration is with the concept of the "imperial feminist," which frames some feminists as enablers of empire, broadly understood as Western dominance. She specifically targets the academic Deepa Kumar for writing that "there are those who either consciously or inadvertently enable empire. … In short, the ideology of Imperial Feminism doesn't only emerge from elites and their institutions in the West but from people in and from the Global South as well" (cited in ibid. 136).

Khan proceeds to quote another academic, Meredith Tax, who has debated the concept of imperial feminism with Kumar. Tax argues that it has become "almost impossible now to stand alongside Muslim women without being accused of the sin of Orientalism," and her experience is that insofar as a woman does, "If she is white, she will be told that she is colonialist; if she is a woman of colour or feminist from the Global South, she will be considered to lack authenticity" (cited in ibid. 136). Note that Manea also draws on a similar quote from Tax when she discusses the same issue (2016, 32). Recall also that the claims that Okin's suggestion that young women in patriarchal cultures be engaged constitutes "divide and rule" and that she herself is colonialist closely resembles this discourse.

Framing the non-Western feminist as an imperial feminist who goes against her own culture and people serves to delegitimize non-Western feminist voices, at worst by labelling them native informants, betrayers of their own community. A research paper by Sunaina Maria provides a good example of this, as it draws on a breadth of literature which perpetuates the native informant trope. In this paper, she describes Muslims who question their culture as "native informants" who, as "good Muslims," need "bad Muslims" to stay in business. She hones in on the Muslim writer Irshad Manji, who has written a book about her own experiences with Islam which praises the West and argues for an Islamic reformation. Maria argues that Manji's presentation of herself as a "moderate" Muslim "is both profitable and strategic" and describes her writing as "hysterical ranting" and Arab "native informants" in the media in general as "shrill" (2009, 635-644). Drawing on Sherene Razack, she further argues that Manji is in fact Orientalist and deeply racist because of her "view from inside the harem" (cited in ibid. 644). She frames Muslim authors who supposedly produce this imperial feminism as self-centered proponents of neo-liberalism, as they are acting "in the spirit of entrepreneurial capitalism" (ibid. 648).

Overall, then, there are many things which can delegitimize a Muslim feminist, but they all depend on particular interpretations of what she (or he) is doing. What it comes down to are judgments

of legitimacy filtered through judgements of either intentionality or rationality. If the Muslim feminist publishes a book, her word is not legitimate because there is a profit motive, and, by virtue of being imperial feminists, even Muslim feminists can be considered Orientalists. Once again the issue seems to be that the issues voiced by the Muslim feminists, or feminists from traditionally Muslim communities, are considered not on their own terms but rather using a stock of preexisting vocabulary and symbols, essentially a frame which interprets them in a certain way. Maria argues that Manji's father, through her negative description of him, "symbolizes the oppressiveness of Islam as embodied by the figure of the patriarchal and violent Muslim male, who has the potential to darken into the sinister figure of the 'bad' Muslim terrorist," which skirts somewhat around the point that part of Manji's problem with him is that he beat her mother and chased Manji herself around with a knife once (Geraldine Bedell 2008). In other words, the focus on the concept obscures the empirical reality.

The issue is not only that the native informant is not considered to be an authentic member of her community and hence not capable of having a legitimate opinion about it, but also that this is reproduced outside of a merely academic context. Khan provides the example of a young Muslim activist who wanted to challenge the Islamist theology, and was subsequently subjected to British "Muslim slutshaming" on the internet, a mix of being labelled a slut and a fake Muslim (2016, 166). This can arguably be considered a somewhat harsher interpretation of simply dismissing someone as a native informant. The point is that the delegitimization that is taking place in academia can also take place in public life. To take a more widely known example, the current mayor of London Sadiq Khan has had to apologize for saying that "you can't just speak to the Uncle Toms," when interviewed by Iranian television in 2009 about his experiences as a Minister of Community Cohesion working with Muslim communities (Caroline Mortimer 2016). "Uncle Tom" is a label that refers to a black person who is subservient to whites (ibid.), essentially working on the same tropes as "native informant."

For one final example, I turn to the organization *Faith to Faithless*, a British organization which focuses on creating a safe space for atheists from traditionally religious, mainly Muslim, communities. In a speaking event at a university, a group of the organization's female members discussed whether leaving Islam was a feminist issue, a discussion which also involved personal narratives. One member from an Asian minority community said that the focus of her struggle had been "emancipation from control," which was most apparent in how she should dress. She says that wearing the hijab wasn't overtly forced, but her experience was still that, because religion was privileged in society, women with hijab were given a higher status, while not wearing it could result in being called a whore (Halima 2016). In her case, it was not the demands of modernity or the host nation which placed restrictions on her, but rather those from the minority community of which she was part.

Another speaker at the same event aired the same issues with control, but also with the issue of being stuck in her own culture. All the while she was having doubts about her religion, her attending

a Muslim high school and Muslim college meant that she did not really have any social points of reference outside of her Muslim community until university, where she found people who helped her question her religion (Sarah 2016). In other words, she views secular education as the source of her emancipation. This is also the case with Aliyah Saleem, one of the founders of the organization, whose views on religion resemble Namazie's. She is opposed to religion's desire to control the body of women, and explains that it was in college that feminism and Marxism gave her a language to express disapproval with Islam. She also mentions her experience of ex-Muslims being dehumanized and ignored, or called Uncle Toms or native informants (Saleem 2015).

To sum up, it is quite easy to document how dissenting British women from traditionally Muslim communities face a discourse which labels them as essentially illegitimate actors. As such, it appears that the activists and Manea have quite a lot of cases with which to support their framing work, outside of the ones they mention themselves. At the same time there is an expansive vocabulary with which to delegitimize their framing, which can be seen as constituting a broadly post-colonial master frame within academia dealing with multiculturalism, and whatever standards of female behavior members of their own communities have.

The issues with this development of a discourse which can delegitimize internal cultural criticism resembles a debate that is currently taking place in the adjacent field of psychology. Nick Haslam recently suggested that research in the field has become subject to "concept creep," "a process by which many of the definitions used in the field have expanded horizontally, to include qualitatively new phenomena," as well as vertically, to include quantitatively new behavior (2016, 1). Whether that is what has happened in the present case would require further research on the etymology of the relevant concepts, but already some commonalities are apparent. The concepts mainly fit within a left-wing agenda, and one possible explanation for the creep could be "the rising prominence of minority groups, such as transgendered people and Muslims," which results in "new forms of existing phenomenon" being "added by accretion" (ibid. 11). This is not necessarily a negative development. Rising awareness of the particular issues facing particular demographics should always be welcome, but consider that a term like "native informant" is now being used to delegitimize minorities critical of their own community, and the pitfalls of concept creep should worry multicultural theoreticians.

6.2 Universalism

One of the central claims of the minority women's rights activists and Manea is that secular values, and more broadly what constitutes good and bad morally speaking, are universal and universally applicable. In this section I analyze and challenge this idea, drawing on literature which deals both with multiculturalism and human rights, as well as the history of secularism in Muslim countries. The cases below do not all concern themselves with the clash of traditionally Muslim cultures and a Western host society, but they all share the theme of problematizing the application of universal

human rights in regards to non-Western cultures. As such, they serve to elaborate on the empirical backing of the activists and Manea's framing efforts.

The notion that dissident members of majority Muslim communities are not authentic voices necessarily rests on some notion of certain values being more authentic for some people than others. One of the issues with viewing human rights as a Western invention is that history is a lot more complicated than that. To take one case of Western religion, the Catholic Church only endorsed human rights and religious liberty during the Second Vatican Council in 1965. It also framed this in Christian terms, claiming that this had always been part of Christian tradition (Bielefeldt 2000, 96-98). In other words, the Catholic Church framed the cooptation of human rights in a manner that did not indict the integrity of the religion. Of course, to say that the West, through religion or otherwise, has achieved a total compliance with human rights would be wrong, particularly as relates to sexuality. Bielefeldt argues that "Human rights did not develop as a 'natural unfolding' of humanitarian ideas deeply rooted in the cultural and religious traditions of Europe," but that people in the West "had (and still have) to fight to have their rights respected" (ibid. 97).

Bielefeldt's argument stems from his tracing of the development of notions of universal human rights in Western and Islamic countries, alongside the development of the academic idea that these rights are uniquely Western. He, much like Manea, considers the idea "that the assumption that what is 'rooted' in the original sources of a particular culture can legitimately be claimed as an exclusive heritage of that culture" to be an "essentialist appropriation" that does not recognize history as contingent, and that nothing is ever "naturally unfolding" from something inherent in a "preexisting cultural potential" (ibid. 99). Indeed, Bielefeldt argues that propagating the idea that human rights are Western is what prompts the thinking "that by fighting for human rights 'Westeners' simply try to impose their own cultural values" (ibid. 102). Going by the multicultural texts discussed in this paper, the idea of human rights as something belonging to the West does indeed seem to be a feature in multicultural discourse, as does the subsequent tying of human rights to Western domination.

Coming from a similar historical perspective as Bielefeldt, Nader Hashemi argues that while secularism in Europe was largely bottom up, and "intimately connected with debates in civil society," colonialism meant that "secularism in the Muslim world was top-down." Hence, "for a generation of Muslims growing up in the post-colonial era, despotism, dictatorship, and human rights abuses came to be associated with secularism" (2010, 334). The skepticism of ideas which are mostly prevalent in the West, if not "of" the West per se, is not based on nothing. The criticism of colonialism and empire as explanatory factors behind attempts to spread or enforce universalist notions of human rights and secularism in this paper should not be seen as denial that these things are not real historical factors. In my critical analysis of the discourse of Modood, my primary concern was with his framing of those who did not agree with his vision of multiculturalism as irrational through labelling them "radical

secularists." Simply dismissing him and other multiculturalists on the grounds that they are essentialists would be making exactly the same mistake.

Even if we accept that secular human rights are not inherent to or owned by the West, the actual enforcement of human rights in traditionally Muslim communities by way of secularization may not be pragmatic. In the case of Morocco, it took 30 years of work from women and human rights NGOs to develop and have implemented a new family law that, ideally, guarantees equality before the law for women. Nouzha Guessous, who took part in this process, attributes its success in part to the recognition that the new family law had to be legitimized religiously, as it would otherwise simply have been too difficult to institute due to the importance of religion in Moroccan identity (2012, 529). Even so, her conclusions about the political use of Islam to limit women's rights mirror those of the activists and Manea.

She observes that following the Arab spring, a number of Middle Eastern countries saw the revolutionaries institute "a retrograde and patriarchal instrumentalization of Islam" which justified regressing women's rights "by recalling *the attachment of Muslim people to the 'sanctity' of their 'cultural specificities'*" (ibid. 531-32, original emphasis). In response, she argues that "all democrats have not only the duty to secure women's rights when they exist but also to promote justice and gender equality as universally defined" (ibid. 532). To Guessous, "Women's rights are one of the major ways to prevent and prohibit the use of Islam as a political instrument," as "they help encourage a separation between religion and the state laws and policies" (ibid. 533). Using religious arguments to amend the law, in other words, was pragmatic, and only acceptable insofar as the result was greater separation between religion and law. In addition, note that her rejection of political Islam is the same as Manea's, and, more interestingly, also constitutes a rejection of applying different standards to different people based on notions of their cultural specificities.

Using the multicultural vocabulary discussed so far, however, we could frame the success of the Moroccan campaign as the success of imperialism and colonialism. There were, after all, international organizations involved in restructuring the role of religion in the lives of Moroccans. Even if Guessous considered engaging with religious references essential to the process, this seems to have been merely a pragmatic decision. The ultimate goal was still increased secularism and a lesser role for religion, and so we could consider her a radical secularist. We could consider the women fighting against the political Islam in their society, in Morocco and elsewhere, as native informants, who were used by international organizations as part of a divide-and-rule strategy to diminish Islam. In other words, we could reinterpret the struggle by attributing a series of delegitimizing intentions to the actors involved, and consider them, knowingly or not, to be acting on behalf of Western hegemony.

To sum up, viewing secular human rights as something inherently Western is empirically dubious. It is certainly true that people from Western countries enjoy secular human rights to a greater

degree than people elsewhere, but even so it can also be argued that no Western country fully lives up to them. This can be interpreted in two entirely opposite ways depending on how one frames it. Coming from a universalist angle, the failure of Western countries to live up to secular human rights, coupled with a fight for the same in other parts of the world, attests to the universality of the principles. Western countries do not fully live up to them, and even to the extent that they do, the development toward that has been far from even. Coming from a more culturally relativist angle which considers secular human rights values inherently Western, however, one could view the West's failures to live up to these values as evidence that Western morality is hypocritical, and hence no better or worse than other systems of morality as a basis for rights. Again, the last position requires one to consider certain views *inherent* to certain demographics based on historical developments.

Indeed, it is the struggle against that last view that is the core of the activists and Manea's framing. The next section goes more in depth with this by discussing the role of intersectionality in their framing, including the role of hegemony in it.

6.3 The Difficulties of Intersectionality

While the activists and Manea are clearly against giving any special treatment for religions in the political realm, they do not seem opposed to policies targeting particular groups. Even though Patel is the only one of them to directly engage with intersectionality as a concept, their framing centers on the belief that women from traditionally Muslim minorities require, and deserve, special attention. Manea suggests that immigrants be referred to by nationality, not religion (2016, 239), while Patel and SBS define their work as helping Black Minority Ethnic (BME) women (Southall Black Sisters 2016) Their framing does not rest on rejecting the relevance of identities, but rather on how these interact, and hence their framing is highly intersectional, even if it only Patel who is explicit about it.

To take a case where the ethnic focus of SBS became problematic, in 2007 the Ealing Council attempted to cut funding for SBS, on the grounds that their focus on BME women "worked against the interest of equality, diversity, and cohesion, and because in accordance with the Race Relations Act 1976, their name and existence excluded white women and they were hence discriminatory and divisive" (Patel 2011, 143). The funding ultimately continued, but the situation does suggest that catering specifically to minorities in danger because of the intersection of gender, ethnicity, and religion is politically problematic.

Mieke Verloo distinguishes between structural and political intersectionality. Structural intersectionality "occurs when inequalities and their intersections are directly relevant to the experiences of people in society," while political intersectionality "indicates how inequalities and their intersections are relevant to political strategies and how strategies regarding one axis of inequality are seldom neutral toward other axes" (Verloo 2013, 900). The framing of the activists and Manea targets both sides. On the one hand, they call for greater focus on the lived experiences of

minority women at the intersection between ethnicity, religion, and gender. On the other, they also attack both political and academic discourses which prioritize religion oblivious of its impact on women. The multicultural discourse discussed in this paper does not oppose this explicitly, but its overall focus on culture as the site where minority rights must be fought nonetheless stands in opposition, as intersectionality requires considering how the different identities interact.

Modood's view that it is reasonable to let the political identity "Muslim" take the place of "South Asian" is also incompatible with intersectionality, as it considers identities to function in a discrete manner instead of intersecting. Indeed, intersectionality stands in opposition to Baumann's conception of the dominant discourse, which the particular texts by Modood discussed in this paper represents quite well. Because the dominant discourse equates culture, ethnicity, and nature, it is incapable of intersectionality, yet intersectionality as lived experience is undeniable in the lives of the British minority women in traditionally Muslim communities. In light of the more dismissive respondents of Okin, as well as Modood's theory, we can perhaps call for academic intersectionality. This, to paraphrase Verloo's description of its political counterpart, would highlight how an academic theory seeking to justify rights for a group of people on one axis, such as culture, risks ignoring its own impact on rights on another axis, such as gender equality, were it to be reflected in policy.

The findings in this paper call into question research which deals only with hegemony as Western. Of course, it is doubtful that any researcher would use so simple a definition. Nonetheless, there is a strain in multicultural research where this appears to be the assumption. The activists and Manea's transnational framing casts this implicit view of Western values as the only meaningfully hegemonic values into doubt. It should be quite clear from the uses of the term hegemony throughout this paper that the hegemonic position is always suspect. Because viewing something as hegemonic means viewing something as presupposed, whether this be the superiority of secularism or sharia, it also means viewing it as something that must be questioned. Hence, where one locates hegemony determines which dominant stock of meanings one targets for critique, and likewise which marginalized group one defends.

Indeed, in none of the sources used in this paper is hegemony invoked in a positive fashion. This means that where one identifies hegemony, one has also identified one's antagonist, whether this be secular hegemony in Modood's case, Western hegemony in the case of much of the critique of Okin, or Islamic hegemony in the case of Namazie. Where one locates hegemony also determines where one locates resistance, whether this be a marginalized religious minority or women members of particular religious communities. Locating hegemony is also a political act. Hence, when Namazie attributes hegemony to Islamism, she is also placing her own political project in a position of justified resistance. The last section before my conclusions shortly discusses the political aspects of the activists framing, and how these could prove problematic for them.

6.4 The Political Nature of the Framing Process

Ostensibly, the activist's issue with political positioning may at least partly come from their framing drawing on multiple master frames, but not actually fitting within any. Their criticism of political accommodation of Islamic values resembles that made by Western right-wing politicians, yet they reject any idea of the West as exceptional and their secular ideology is inherently incompatible with viewing Judeo-Christian values as a moral and political nexus. Their focus on defending marginalized individuals and feminism fits broadly with Western left-wing ideology, yet their rejection of political accommodation of another marginalized group delegitimizes them in the eyes of many left-wing political adherents and academics. The texts in Fitnah suggests that their transnational outlook is partly a manifestation of a Marxist internationalist master frame, although further research will have to investigate how central Marxist ideology is to the framing work of transnationally oriented secular women's rights groups from majority Muslim communities.

Namazie's OLA and the secular women's rights movement in general spends a great deal of effort differentiating themselves from the political projects of the far-right. At the same time, the fact that the minority women's rights opposition to sharia in Britain is spearheaded by an organization with ties to Iran's communist party means that the campaign can quite readily be cast as politically motivated, just as granting more space for religion in public can. Considering this, it will be interesting to see whether or not Namazie's political affiliation ends up problematizing the activists' framing efforts. Even if Patel has nothing to do with Iranian politics, she has still associated herself with the Iranian side of Namazie's politics through her contribution to *Unveiled*.

At the same time, the activists do not seem particularly coy about their political affiliation, with many of their writings essentially consisting of thoughts on leftist political theory and how best to reclaim it. Indeed, through their direct engagement with leftist discourse, they appear less interested in avoiding flying their political colors than they are redefining what is legitimately leftist.

In this paper, I have been consciously critical of the multicultural discourse opposed by the activists and Manea, both to understand how their efforts at framing the conversation on multiculturalism and sharia functions as a process, and to call for re-centering the conversation on multiculturalism more toward the internal dynamics of minority and marginalized cultural groups. It is, however, important to remember a warning given to CDA researchers by Fairclough, even if I have only borrowed parts of the theory. He warns that even as one performs a critical analysis of discourse, one must at the same time be careful not to simultaneously naturalize other discourses (1995, 83). This may be difficult to do in practice, as critically analyzing a given discourse, and in so doing questioning and deconstructing it, creates an asymmetry between that and other discourses which have not been questioned. However, as stated toward the end of the chapter on my theory and method, and as exemplified by Modood's description of WAF, there is currently an asymmetry in that the voices of women from traditionally Muslim communities speaking out against injustices

inside their own communities are not considered sufficiently legitimate within academia. Part of the function of this paper has been to draw attention to and mitigate this asymmetry.

One aspect of their framing which could prove problematic is the framing of the Islamic veil as the flag of the Islamic far right and comparable to a Nazi swastika that is supported by Namazie and Hélie-Lucas in *Unveiled*. Judging both from the interviews of Muslim women cited earlier in this paper as well as the personal experiences of the *Faith to Faithless* members, veiling certainly can be used as a form of control from religious authorities. However, in making this claim, they seem to make the same conceptual leap as those denouncing minority women fighting for human rights as "imperial feminists," in that they attribute a political agenda to people simply because they perform an act which *could* be representative of a political agenda. This aspect of their framing could prove untenable, even as they and groups like *Faith to Faithless* can show examples of veiling as vehicles of social control. American Muslim journalist Noor Tagouri was recently featured in an interview in Playboy discussing her choice to wear the hijab to manifest her individuality (Anna Del Gaizo 2016), while the clothing brand H&M recently featured their first hijab wearing British Muslim model in a diversity themed campaign (Monica Sarkar 2016). This means that the claim that veiling is necessarily a sign of oppressive Islamism can be challenged by readily available developments in the way modern popular culture approaches the phenomenon.

Namazie's status as a member of both the Muslim Council of ex-Muslims Britain and the Worker-Communist Party of Iran provide ready evidence that the campaign against Islamic authority in Britain is in part influenced by a general antipathy toward Islam, even from within Muslim majority communities. This is not meant to be a moral judgment of her intentions – indeed, whether the antipathy toward religion and the political agenda came before or after the belief that orthodox authority figures have too much sway is inconsequential. It could, however, be mobilized against the framing efforts of the activists and Manea, as it supports Modood's claim that the campaign against Islam in the public sphere is ideologically motivated and radical in nature.

Chapter 7: Conclusions

For all of the political baggage of Namazie, she, Patel, Manea, and others like them may ultimately provide a challenge to multicultural discourse, both in academia and broader society. They frame the campaign against sharia councils, and religion in the public sphere more broadly, as an issue of resistance from below, and not as the Western state arrogantly dismissing the sincerely held beliefs of religious communities.

The question of who gets to define what constitutes legitimate exercises of power is central to the present case. As is the question of who gets to define what constitutes a legitimate voice, and the two are interconnected. The secular women's rights activists wish to frame secular voices from

minority communities as no less legitimate than religious voices from those same communities. To do so they seek to frame themselves not as embracers of colonialism and Western hegemony, but as actually being the ones *struggling against* hegemony. At the same time, there exists an entrenched discourse working against them, in the form of a vocabulary which can delegitimize such framing, marking supporters of it with labels such as "colonialists," "Islamophobes," and "imperialists." Against this stands their own discourse of "cultural relativism," "essentialism," and "gender apartheid," as well as their case work.

Compounding this is the overlap between the goals of radical right-wing groups and the proponents of universal secular human rights. Even though this overlap begins and ends with governmentally sanctioned public manifestations of Islam, such as sharia and religious schools, they risk being dismissed as merely native informants or Uncle Toms, working with the enemy against the best interests of their own. This will likely not be helped by their stark rejection of religious clothing, which points toward an anti-religious ideology which is concerned with rooting out even symbolic religious representation in the public sphere.

Still, their focus on documenting transgressions within minority communities and direct engagement with both academic multicultural discourse and left-wing discourse could help them carve out an independent identity. If they succeed, applying the same delegitimizing terms to them that might be applied to actual xenophobes will become too strenuous to work, although arguably terms like "native informant" and "imperial feminist" seem quite ready to take their place. Multiculturalism is already embattled both politically and academically, and the West is currently seeing a political turn toward nationalism. In these times, it could prove destabilizing for multicultural discourse, and the political left, to reject the secular minority women's rights perspective. This is where further research into issue-ownership could prove illuminating, to investigate whether it will actually be possible to wrest ownership of the issue of orthodox patriarchy in minority communities away from the far-right.

As this paper has engaged with an ongoing case to avoid the tautology that framing research based on successful framing efforts can suffer from, it is not possible to make any clear conclusions as to whether or not the framing efforts of the activists and Manea are going to succeed. Their success may depend on whether they define their goals not in negative terms, as *against* religion, but rather in positive terms, as *for* secular human rights. Their framing appears to rest primarily on the latter, and hence follows Okin's view that culture should always give way to human rights. They draw a clear line between political and non-political religion, albeit Namazie has expressed views about Islam and religion in general which do more than hint at a generalized animosity. Given that there does indeed appear to be a dominant discourse which has difficulty separating culture and ethnicity, this may make it harder yet for campaigners like the activists and Manea, as their skepticism of religious accommodation can be construed as a form of racism.

Finally, it must be stressed that the purpose of this paper has not been to delegitimize multicultural discourse as a whole, but rather to investigate a critique of a particular branch of it from an interesting angle. It has not been my goal to cover multicultural academia in any broad sense, but rather that which has drawn the ire of a particular social movement. Even if multiculturalism is going out of vogue as an academic theory and as a basis for policy, the theoretical wealth produced by years of multicultural research should not be dismissed out of hand, nor should its contributions to our understanding of the importance of minority rights. While increasing awareness of the internal frictions in minority communities may cast some multicultural prescriptions into question, this is only part of a healthy academic development, where theories are modified as new findings present themselves.

Insofar as multiculturalism as an academic discourse is intended for guiding how to implement policy in the real world, it must contend with the available facts about the people to which these policies apply. By collecting testimonies about negative experiences with sharia and religious authority in Muslim communities in Britain, OLA increases the available facts, as does Patel by sharing what she has learned working in SBS, and so does Manea by using her documentation of actual implementation of sharia law as basis for her critique. The young people in *Faith to Faithless* do so as well, when they come forward and describe their own painful experiences with religious authority within their own communities. Any academic discourse which fails to appreciate this increasing stock of available facts documenting oppression within minority communities, while simultaneously theorizing about how best to create policies benefiting the people within these minorities, risks losing credibility in the long run.

References

Ahmad, Waqar I. U. & Venetia Evergeti. "The Making and Representation of Muslim Identity in Britain: Conversations with British Muslim 'Elites'." *Ethnic and Racial Studies* 33(10): 1697-1717. doi:10.1080/01419871003768055.

Al-Hibri, Azizah Y. 1999. "Is Western Patriarchal Feminism Good for Third World/Minority Women?." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 41-46. New Jersey: Princeton University Press.

An-Na'Im, Abdullah. 1999. "Promises We Should All Keep in Common Cause." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 59-64. New Jersey: Princeton University Press.

Bano, Samia. 2009. "Multicultural Interlegality?: Negotiating Family Law in the Context of Muslim Legal Pluralism in the UK." In *Law and Anthropology*, edited by Michael D. A. Freeman and David Napier, 408-429. New York: Oxford University Press.

Barnett, Adam and Maryam Namazie. 2011. "Enemies not Allies: The Far-Right." London: One Law for All.

Barrett, Martyn. 2013. "Introduction – Interculturalism and Multiculturalism: Concepts and Controversies." In *Interculturalism and Multiculturalism: Similarities and Differences*, edited by Martyn Barrett, 15-43. Council of Europe: Council of Europe Publishing.

Baumann, Gerd. 2015. "Dominant and Demotic Discourses of Culture: Their Relevance to Multi-Ethnic Alliances." In *Debating Cultural Hybridity: Multicultural Identities and the Politics of Anti-Racism,* edited by Pnina Werbner and Tariq Modood, 209-225. London: Zed Books.

Bedell, Geraldine. 2008. "'I Cringed When They Compared Me to Martin Luther." *The Guardian*. Accessed March 8, 2017. URL: https://www.theguardian.com/books/2008/aug/03/women.

Benford, Robert D. and David A. Snow. 2000. "Framing Processes and Social Movements: An Overview and Assessment." *Annual Review of Sociology* 26: 611-639. http://www.jstor.org/stable/223459.

Benford, Robert D. 1997. "An Insider's Critique of the Social Movement Framing Perspective." *Sociological Inquiry* 67(4): 409-430. doi:10.1111/j.1475-682X.1997.tb00445.x.

Bhabha, Homi K. 1999. "Liberalism's Sacred Cow." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 79-84. New Jersey: Princeton University Press.

Bielefeldt, Heiner. 2000. "'Western Versus 'Islamic' Human Rights Conceptions." *Political Theory* 28(1): 90-121. doi:10.1177/0090591700028001005.

Bonino, Stefano. 2013. "*Prevent*-ing Muslimness in Britain: The Normalisation of Exceptional Measures to Combat Terrorism." *Journal of Muslim Minority Affairs* 33(3): 385-400. doi:10.1080/13602004.2013.853977.

Brechin, Jessie. 2013. "A Study of the Use of Sharia Law in Religious Arbitration in the United Kingdom and the Concerns That This Raises for Human Rights." *Ecclesiastical Law Society* 15: 293-315. doi:10.1017/S0956618X13000434.

Brindle, Andrew. 2016. "Cancer Has Nothing on Islam: A Study of Discourses by Group Elite and Supporters of the English Defence League." *Critical Discourse Studies* 13(4): 444-459. doi:10.1080/17405904.2016.1169196.

Brown, Gordon. 2007. "We need a United Kingdom." *The Telegraph.* Accessed March 9, 2017. URL: http://www.telegraph.co.uk/news/uknews/1539367/We-need-a-United-Kingdom.html.

Cameron, David. 2011. "Full Transcript | David Cameron | Speech on Radicalisation and Islamic Extremism | Munich | 5 February 2011." *New Statesman.* Accessed March 9, 2017.URL: http://www.newstatesman.com/blogs/the-staggers/2011/02/terrorism-islam-ideology.

Collins, Chik and Peter E. Jones. 2006. "Analysis of Discourse as 'a Form of History Writing': A Critique of Critical Discourse Analysis and an Illustration of a Cultural–Historical Alternative." *Atlantic Journal of Communication* 14(1-2): 51-69. doi:10.1080/15456870.2006.9644769.

Choudhury, Tufyal and Helen Fenwick. 2011. "The Impact of Counter-terrorism Measures on Muslim Communities." *Equality and Human Rights Commission*. London: Duham University. http://dro.dur.ac.uk/10715/1/10715.pdf.

Cobb, Sara. 1994. "A Critique of Critical Discourse Analysis: Deconstructing and Reconstructing the Role of Intention." *Communication Theory* 4(2): 132-152. doi:10.1111/j.1468-2885.1994.tb00087.x.

Croft, Stuart. 2012. "Constructing Ontological Insecurity: The Insecuritization of Britain's Muslims." *Contemporary Security Policy* 33(2): 219-135. doi:10.1080/13523260.2012.693776.

Crowdfunder. 2016. "'Women and Sharia Law' to Every MP." Accessed January 19. http://www.crowdfunder.co.uk/sharia-law-and-womens-rights-book-to-every-mp.

Dustin, Moira and Anne Phillips. 2008. "Whose Agenda Is It?: Abuses of Women and Abuses of 'Culture' in Britain." *Ethnicities* 8(3): 405-424. doi:10.1177/1468796808092451.

Fairclough, Norman. 1995. *Critical Discourse Analysis: The Critical Study of Language.* England: Pearson Education Limited.

Fairclough, Norman. 2000. *New Labour, New Language?.* London: Routledge.

Gaizo, Anna del. 2016. "Media Wunderkind Tagouri Makes a Forceful Case for Modesty." *Playboy.* Accessed March 9, 2017. http://www.playboy.com/articles/renegades-noor-tagouri.

Gilman, Sander L. 1999. "'Barbaric' Rituals?." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 53-58. New Jersey: Princeton University Press.

Goffman, Erving. 1986. *Frame Analysis: An Essay on the Organization of Experience.* Boston: Northeastern University Press.

Guessous, Nouzha. 2012. "Women's rights in Muslim Societies: Lessons from the Moroccan Experience." *Philosophy and Social Criticism* 38(4): 525-533. doi:10.1177/0191453712448000.

Halima. "Body Policing & Emancipation from Control[HD] | Halima [Ex Muslim]." *YouTube* video, 14:49. *Faith to Faithless*. Posted June 29, 2016. Accessed March 9, 2017. https://www.youtube.com/watch?v=i6iqU9tCnCA.

Hasan, Suhaib. 2014. "A Paper Submitted to the International Family Law Conference on 14 May 2014 at the University of Islamabad." *Sheikh Suhaib Hasan Blog,* Accessed May 20, 2017. http://sheikhsuhaibhasan.blogspot.dk/2014/05/muslim-family-law-in-britain.html.

Hashemi, Nader. 2010. "The Multiple Histories of Secularism: Muslim Societies in Comparison." *Philosophy and Social Criticism* 36(3-4): 325-338. doi:10.1177/0191453709358842.

Haslam, Nick. 2016. "Concept Creep: Psychology's Expanding Concepts of Harm and Pathology." *Psychological Inquiry* 27(1): 1-17. doi:10.1080/1047840X.2016.1082418.

Haugaard, Mark. 2012. "Rethinking the Four Dimensions of Power: Domination and Empowerment." *Journal of Political Power* 5(1): 33-54. doi:10.1080/2158379X.2012.660810.

Hélie-Lucas, Marieme and Maryam Namazie. 2013. "The Veil is Nothing but the Flag of the Muslim Far-Right." *Unveiled* 1(2): 2-8. http://fitnah.org/fitnah_publication_english/unveiled_2.pdf.

Hélie-Lucas, Maryeme and Maryam Namazie. 2014: "Against Gender Apartheid: Mixing is the Future of Humanity." *Unveiled* 2(1): 2-6. http://fitnah.org/fitnah_publication_english/unveiled_4.pdf.

Honig, Bonnie. 1999. "'My Culture Made Me Do It'." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 35-40. New Jersey: Princeton University Press.

Islamic Sharia Council. 2017. "About Us." Accessed January 29. http://www.islamic-sharia.org/aboutus/.

Kenny, Celia G. 2014. "Law and the Art of Defining Religion." *Ecclesiastical Law Society* 16: 18-31. doi:10.1017/S0956618X13000793.

Khan, Sara and Tony McMahon. 2016. *The Battle for British Islam: Reclaiming Muslim Identity from Extremism*. London: Saqi Books.

Kymlicka, Will. 1999. "Liberal Complacencies." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 31-34. New Jersey: Princeton University Press.

Kymlicka, Will. 2012. "Comment on Meer and Modood." *Journal of Intercultural Studies* 33(2): 211-216. doi:10.1080/07256868.2012.649528.

London, Herbert. 2008. *America's Secular Challenge: The Rise of a New National Religion.* United States: Encounter Books.

Mahmoud, Houzan and Maryam Namazie. 2014. "'ISIS' is No One's Representative." *Unveiled* 2(6-7): 6-9. http://fitnah.org/fitnah_publication_english/unveiled_2_6-7.pdf.

Manea, Elham. 2016. *Women and Shari'a Law*. New York: I.B Tauris & Co. Ltd.

Maria, Sunaina. 2009. "'Good' and 'Bad' Muslim Citizens: Feminists, Terrorists, and U.S. Orientalism." *Feminist Studies* 35(3): 631-656. http://www.jstor.org/stable/40608397.

May, Theresa. "Speech to Conservative Party Conference 2014." *Conservative Party*. Accessed March 9, 2017. http://press.conservatives.com/post/98799073410/theresa-may-speech-to-conservative-party.

Michel, Jean-Baptiste, Yuan Kui Shen, Aviva Presser Aiden, Adrian Veres, Matthew K. Gray, William Brockman, The Google Books Team, Joseph P. Pickett, Dale Hoiberg, Dan Clancy, Peter Norvig, Jon Orwant, Steven Pinker, Martin A. Nowak, and Erez Lieberman Aiden. 2011. "Quantitative Analysis of Culture Using Millions of Digitized Books." *Science* 331(6014): 176-182. doi:10.1126/science.1199644.

Miller, John and Maryam Namazie. 2013. "Siding with the Oppressor: The Pro-Islamist Left." London: One Law for All.

Modood, Tariq. 2008. "Multiculturalism and Groups." *Social & Legal Studies* 17: 549-553. doi:10.1177/0964663908097086.

Modood, Tariq. 2009. "Muslims, Religious Equality and Secularism." In *Secularism, Religion, and Multicultural Citizenship*, edited by G. B. Levey and T. Modood, 164-186. Cambridge: Cambridge University Press.

Modood, Tariq. 2013a. "Multiculturalism and Religion: A Three Part Debate. Part One: Accommodating Religions: Multiculturalism's New Fault Line." *Critical Social Policy* 34(1): 121-127. doi:10.1177/0261018313501826.

Modood, Tariq. 2013b. "Part Three: The Fault Lines of Multiculturalism: A Rejoinder." *Critical Social Policy* 34(1): 135-139. doi:10.1177/0261018313501828.

Mortimer, Caroline. 2016. "Sadiq Khan under Fire After Footage Emerges of Him Using Derogatory Term to Describe Fellow Muslims." *The Independent.* Accessed March 8, 2017. URL: http://www.independent.co.uk/news/uk/politics/sadiq-khan-under-fire-after-footage-emerges-of-him-using-derogatory-term-to-describe-fellow-muslims-a7012286.html.

Muslim Arbitration Tribunal. 2015. "Inheritance Disputes and Islamic Wills." Accessed January 29. http://www.matribunal.com/inheritance-disputes.php.

Naili, Hajer and Maryam Namazie. 2013. "The Rise of Fitnah." *Unveiled* 1(1): 3-4. URL: http://fitnah.org/fitnah_publication_english/unveiled1.pdf.

Namazie, Maryam, Pragna Patel and Gita Sahgal. 2013. "We Should Not Abandon Secularism." *Unveiled* 1(3): 1-9. URL: http://fitnah.org/fitnah_publication_english/unveiled_3.pdf.

Namazie, Maryam, Pragna Patel, Chris Moos, Gita Sahgal. "Sharia Law is Incompatible with Human Rights." *Unveiled* 3 (8-9). URL: http://fitnah.org/fitnah_publication_english/unveiled_3_8-9.pdf.

Namazie, Maryam. 2011. "Maryam Namazie at Athiest Alliance International Conference, Dublin." Accessed January 29. https://www.youtube.com/watch?v=Ui3sAKzpjQU.

Namazie, Maryam. 2013. *Unveiled* 1(3) URL: http://fitnah.org/fitnah_publication_english/unveiled_3.pdf.

Namazie, Maryam. 2015. "Why I Speak Out Against Islamism." The Guardian. Accessed January 29. https://www.theguardian.com/commentisfree/2015/oct/13/islamism.

Nussbaum, Martha C. 1999. "A Plea for Difficulty." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 105-114. New Jersey: Princeton University Press.

O'Neill, Daniel I. 1999. "Multicultural Liberals and the Rushdie Affair: A Critique of Kymlicka, Taylor, and Walzer." *The Review of Politics* 61(2): 219-250. http://www.jstor.org/stable/1408356.

Okin, Susan Moller with respondents. 1999. *Is Multiculturalism Bad for Women?.* Edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum. New Jersey: Princeton University Press.

Okin, Susan Moller. 1999. "Is Multiculturalism Bad for Women?." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 9-24. New Jersey: Princeton University Press.

Okin, Susan Moller. 1999. "Reply." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 117-131. New Jersey: Princeton University Press.

One Law for All. 2016. "About." *One Law for All.* Accessed January 29. http://onelawforall.org.uk/about/.

One Law for All. 2016a. "Personal Testimonies by Women on Inequities of Sharia Courts." Accessed March 7. http://onelawforall.org.uk/sharia-testimonials/.

Owen, Robert Dale. 1872. *The Debatable Land Between this World and the Next*. London: Trubner & Co.

Panayi, Panikos. 2004. "The Evolution of Multiculturalism in Britain and Germany: An Historical Survey." *Journal of Multilingual and Multicultural Development,* 25(5-6): 466-480. doi: 10.1080/01434630408668919.

Parekh, Bhukhu. 1999. "A Varied Moral World." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 69-75. New Jersey: Princeton University Press.

Patel, Pragna and Julia Bard. 2010. "From Multiculturalism to Multifaithism? A Panel Debate." *Studies in Ethnicity and Nationalism* 10(2): 310-314. doi: 10.1111/j.1754-9469.2010.01084_2.x.

Patel, Pragna and Maryam Namazie. 2014. "'Equality Before the Law' is not Just an Empty Phrase." *Unveiled* 2(4). http://fitnah.org/fitnah_publication_english/unveiled_2_4.pdf.

Patel, Pragna. 2008. "Faith in the State? Asian Women's Struggles for Human Rights in the U.K." *Feminist Legal Studies* 16(1): 9-36. doi:10.1007/s10691-007-9076-8.

Patel, Pragna. 2011. "Women Migrants and Faith Organizations: Changing Regimes of Gender, Religion and Race in London." *Feminist Review* 97: 142-150. doi:10.1057/fr.2010.39.

Pollitt, Katha. 1999. "Whose Culture?." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 27-30. New Jersey: Princeton University Press.

Ryan, Louise. 2011. "Muslim Women Negotiating Collective Stigmatization: 'We're Just Normal People'." *Sociology* 45(6): 1045-1060. doi: 10.1177/003803851141617.

Saleem. "Islam & Apostasy - Aliyah Saleem Faith to Faithless @ Skeptics in the Pub Newcastle." *Youtube,* 42:25. *Faith to Faithless.* Posted December 11, 2015. Accessed March 9, 2017. https://www.youtube.com/watch?v=Q5c7SkYw0F8.

Sarah. "Running Away from Home & Hijab[HD] | Sarah [Ex Muslim]." *YouTube* Video, 12:04. *Faith to Faithless*. Posted June 29, 2016. Accessed March 9, 2017. URL: https://www.youtube.com/watch?v=i6iqU9tCnCA.

Sarkar, Monica. 2016. "H&M's Latest Look: Hijab-wearing Muslim Model Stirs Debate." *CNN*. Accessed March 20, 2017. URL: http://edition.cnn.com/2015/09/29/europe/hm-hijab-model/.

Singh, Gurnam and Stephen Cowden. 2011. "Multiculturalism's new fault lines: Religious fundamentalism and public policy." *Critical Social Policy* 31(3): 343-364. doi:10.1177/0261018311398782.

Singh, Gurnam and Stephen Cowden. 2013. "Part Two: Response to Tariq Modood – Accommodating Religions: Who's Accommodating Whom?" *Critical Social Policy* 34(1): 128-134. doi:10.1177/0261018313501827.

Snow, David A., E. Burke Rockford, Jr., Steven K. Worden and Robert D. Benford. 1986. "Frame Alignment Processes, Micromobilization, and Movement Participation." *American Sociological Review* 51(4): 464-481. http://www.jstor.org/stable/2095581.

Southall Black Sisters. "Boycott of the Sharia Law Inquiry." *Southall Black Sisters*. Accessed March 9, 2017. http://www.southallblacksisters.org.uk/news/boycott-sharia-law-inquiry.

Southall Black Sisters. 2016. "SBS Demands Equal Access to Justice." Accessed March 7. http://www.southallblacksisters.org.uk/news/sbs-demands-equal-access-justice.

Tamir, Yael. 1999. "Siding with the Underdogs." In *Is Multiculturalism Bad for Women?*, edited by Joshua Cohen, Matthew Howard, and Martha C. Nussbaum, 47-52. New Jersey: Princeton University Press.

Uberoi, Varun, Nasar Meer, Tariq Modood and Claire Dwyer. 2011. "'Our Own People': Ethnic Majority Orientations to Nation and Country." In *Global Migration, Ethnicity and Britishness* edited by Tariq Modood and John Salt, 205-224. New York: Palgrave Macmillan.

Van Dijk, Teun A. 2006. "Ideology and discourse analysis." *Journal of Political Ideologies* 11(2): 115-140. doi: 10.1080/13569310600687908.

Vellenga, Sipco. 2008. "The Dutch and British Public Debate on Islam: Responses to the Killing of Theo van Gogh and the London Bombings Compared." *Islam and Christian-Muslim Relations* 19(4): 449-471. doi:10.1080/09596410802337636.

Verloo, Mieke. 2013. "Intersectional and Cross-Movement Politics and Policies: Reflections on Current Practices and Debates." *Signs* 38(4): 893-915. doi:10.1086/669572.

Women Against Fundamentalism and Southall Black Sisters. 2007. "Submission by Women Against Fundamentalisms and Southall Black Sisters and Southall Black Sisters." Accessed March 8, 2017. http://womenagainstfundamentalism.org/?page_id=12.

Yilmaz, Ferruh. 2015. "From Immigrant *Worker* to *Muslim* Immigrant: Challenges for Feminism." *European Journal of Women's Studies* 22(1): 37-52. doi:10.1177/1350506814532803.