Framing Anti-Terrorism Policies: Debates in the United Kingdom and the Netherlands

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Abstract

Advanced industrialized nations are struggling to respond to the challenge of a terrorist threat perceived to be posed primarily by Islamist extremists. In several countries recent terrorist attacks have increased the urgency of an official response. Although potential components of anti-terrorism policy are similar from one country to the next, the overall nature of the response varies considerably. This paper argues that cross-national variation derives from differences in the framing of the terrorist threat in domestic political debates. These differences, in turn, are shaped by long-standing discourses on the integration of immigrant groups into society. A comparative study of Dutch and British anti-terrorism debates illustrates the argument. In the Netherlands, terrorism has been perceived simultaneously as a symptom and an indictment of a failed integration policy. In the United Kingdom, in contrast, it is seen more as an expression of individual extremism that could occur anywhere. This divergence explains why a less severe terrorist attack in the Netherlands has nevertheless resulted in a more aggressive official response, as well as in more soul searching about broader Dutch integration policies.

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"As we legislate to address it, we must do so on the basis, first of clarifying the values and society that we are seeking to defend, and secondly, of identifying the threat with which we have to deal."

Home Secretary Richard Clarke[1]

On November 9, 2005, Tony Blair suffered his first defeat as prime minister in the House of Commons, in a debate on anti-terrorism policy. A comfortable majority of 31 MPs rejected his government's proposal to allow the policy to hold terrorist suspects for 90 days without charge. Nine months earlier a similar debate took place in the Netherlands, but with a noticeably different tone and outcome. The Dutch government received broad support from most political parties for its proposals, including extending the length of time suspects can be held without being brought up on charges. The contrast between the push for restraint in the United Kingdom and the enthusiasm for potentially far-reaching measures in the Netherlands is all the more striking because the latter has long been considered one of the most tolerant and liberal countries in the world.

The anti-terrorism policy debate in each country was colored by recent terrorist attacks: the murder of Theo van Gogh in November 2004, and the attacks on the London public transportation system in July 2005. By almost any measure the attacks in the United Kingdom were more severe — and more typically 'terrorist' in nature — yet the reaction of the British leadership was more measured both in rhetoric and in policy than was the case in the Netherlands. What, then, explains this double puzzle? Why did a single political murder in a country known for its tolerance result in a far more intense reaction than did two successive coordinated terrorist attacks in a country rather more used to being "tough" on terrorism?

Several plausible answers suggest themselves. The parliamentary system in the Netherlands makes it easier for extreme opinions to be heard (and perhaps acted upon) in the legislature. However, the Dutch government received support for its proposals from representatives across the political spectrum, including all the major political parties. Prior experiences with terrorism may have taught the British that suspending civil liberties is rarely very helpful. Yet the comparative paucity of references to IRA terrorism in the recent British debates suggests that these lessons were not foremost in the minds of those opposing Tony Blair. Indeed, in both countries it was generally taken for granted that the current terrorist threat is intrinsically different from earlier threats, largely due to its close perceived association with Islamist extremism, both international and home-grown.[2]

In contrast to these explanations, the present paper argues that a key factor explaining the difference between the United Kingdom and the Netherlands is how political leaders view the relationship between the terrorist threat and policies aiming at the integration of immigrant (usually Muslim) groups into society. The evidence presented here shows that the Dutch and British reactions to their respective terrorist episodes — both in rhetoric and in policy — follow logically from the way these episodes are interpreted within the broader framework of long-standing discourses on the integration of immigrant groups into society. In the Netherlands, muslim extremism is seen as fatally undermining crucial assumptions informing Dutch integration policy. In Britain, in contrast, the same extremism is seen more as an outcome of wider, contemporary, international processes not directly implicating British integration policies.

In making this argument, the paper proceeds as follows. A first section provides contextual and background information. I briefly describe the history of integration policy in each country, and review the recent terrorist attacks and the overall shape of each government's anti-terrorism proposals in response to these attacks. A second section introduces the legislative debates on these bills and discusses the method used to analyze these debates. The third part of the paper, finally, presents a systematic analysis

of the contents of these debates and discusses the implications. This section also provides an brief overview of broader societal debates on the same issues.

Integration policy and terrorism in the Netherlands and the United Kingdom

Integration policy

Integration policy in the Netherlands is inextricably linked to the country's historical legacy of consociationalism (cf. Lijphart, 1968). The Dutch tradition of pillarization encouraged different groups, identified primarily on religious grounds, to live in communities that were socially non-overlapping. As Lijphart pointed out, "Rival subcultures may coexist peacefully if there is little contact between them and consequently few occasions for conflict" (1975:101). However, Lijphart also noted that several other conditions were necessary for such a system to work well. First, "distinct lines of cleavages" are expected to "promote the internal political cohesion within each subculture and consequently the latitude that the leaders have to strike bargains with the leaders of rival subcultures" (1975:101). Second, there needs to be "some degree of national solidarity," at the very least at the elite level (1975:100). In the traditional Dutch system, distinct lines of cleavage did in fact coexist with these other two conditions, and the system worked quite nicely. However, as Lijphart himself conceded as early as 1975, upon examining the Irish case, such coexistence was hardly automatic and thus ought not simply to be assumed.[3] It took several decades, however, for this message to reach the Dutch governing elites.

Although the rigid societal separation associated with consociationalism was already obsolescent at the time Lijphart published his seminal work on pillarization in the Netherlands (1968), the institutional structures associated with it have continued to exist, albeit at times in attenuated forms. To give but two important examples, both broadcasting organizations and secondary schooling have continued to be focused, at least nominally, on specific historical pillars. When the Dutch government officially recognized that many so-called 'guest-workers' could be expected to remain in the Netherlands indefinitely, therefore, it seemed logical to draw upon historical experience as well as institutional realities and incorporate these individuals into a new pillar, even in an increasingly unpillarized society.

In a government white paper on the incorporation of minorities into Dutch society, the government accordingly argued that "minorities should have the same chances to decide on the shape and substance of the ways in which they express and experience their identities as other existing identity groups in Dutch society" (Staten-Generaal, 1983, p. 107). Former prime minister Ruud Lubbers has noted that, "our theory was that people in a multicultural society needed space to preserve their own culture and their own language," calling this "our typical Dutch twist" on maintaining social peace.[4]

One of the more visible results of the Dutch pillar-based integration policy has been the formation of publicly-funded Islamic schools, of which there are close to 50 today, most of them concentrated in the larger cities.[5] Along similar lines, students have a right to receive Islamic religious instruction in the public schools. In the area of radio and television, likewise, the national public broadcasting organization is mandated to encompass all pillars, and is required by law to devote at least one fifth of its broadcasting time to programs aimed at minority publics, often in their own languages (Mira Media, 2004).

The policy of relegating immigrants to their own social pillar has greatly influenced their interactions with the national institutions of government as well. As part of the pillarized model, the Dutch government has long actively funded various religiously-inspired NGOs. As immigrants began to organize their own groups, the government began funding their NGOs as well. Similarly, immigrant groups have been inserted into various corporatist structures, with seats on national advisory bodies and the like. Often, in line with Lijphart's assumption that leaders can deliver their publics, immigrant organizations are placed partially in charge of implementing official minority policies (Duyvené de Wit & Koopmans, 2005, p. 58). The state has classified minorities largely along ethnic/national and religious lines, and groups have to be organized along the same lines in order to be eligible for state funding. This creates considerable incentives for groups to avoid branching out across sub-pillars within the immigrant community.

British integration policy differs quite strikingly from that applied in the Netherlands. It focuses much less on particular ethnic or religious identities, and much more on racial identities. Special race relations policies, introduced in the mid-1960s, were inspired to a considerable extent by events and policies observed in the United States. As a result, the framing of the integration problem borrowed concepts that were salient in the U.S. debate, most notably the category of 'blacks'. In the case of Britain, this category was joined fairly soon by the category of 'Asians'. British integration policy has aimed to facilitate integration by eliminating, as much as possible, racial discrimination in all its forms. With this goal in mind, the government passed a succession of racial equality laws and created a number of advisory bodies to help promote the successful implementation of these laws (Bleich, 2003). The central concern of these laws and bodies has been to prevent discrimination in the labour market.

The greater emphasis in Britain on broad racial categories and on anti-discrimination policy also means that in education and the media, pro-active government policies are less visible. Although there are about 100 Islamic schools in the United Kingdom, they are almost all privately funded. Similarly, public schools offer some religious education in the public schools, but nowhere near as much as in the Netherlands. Moreover, decisions about religious education are taken on a case-by-case basis by local education

authorities, whereas in the Netherlands it is a national right to receive such instruction. Nor are there special BBC television programs specifically targeted at religious or ethnic groups, although some such programs can be found on the radio.

Finally, both the Netherlands and the United Kingdom have created powerful advisory bodies to advise and oversee integration policy. Even here, the underlying differences in the nature of integration policy between the countries emerge quite clearly. Whereas in the Netherlands, members of these bodies formally represent specific minority 'sub-pillars' (or at least are intended to do so), in Britain they are appointed by the authorities on their personal merits and qualifications.

The differences between British and Dutch integration policy may seem minor, especially when compared against countries with a much less pluralist and civic notion of integration, such as Germany. Nevertheless, recent research shows that they have a measurable impact on the way immigrant minority groups make political claims within each country. Duyvené de Wit and Koopmans examined political arguments regarding migration and ethnic relations in major newspapers in both the Netherlands and the United Kingdom, as well as in Germany (2005).[6] First, and somewhat to their surprise, the authors found that minorities in the Netherlands are only half as prominent in public debates on these topics as is the case in the United Kingdom (2005, p. 64).[7]

A more telling finding of the study regarded the way in which those making particular claims identify themselves: by their status as minorities, immigrants, etc.; by their racial identity, by their religious identity, or by their national or ethnic identity. In the United Kingdom, claimants identify themselves along racial lines almost half the time (46.1%), whereas in the Netherlands they almost never do so (1.4%). Conversely, in the Netherlands ethnic or national identities are much more salient (53.2% compared to 27.5%). Interestingly, in both countries the frequency of self-identification as Muslim is almost identical: 15.5% in the Netherlands, 15.0% in the United Kingdom (2005, pp. 65-66).

Overall, the authors note that "migrants in the United Kingdom appear to be more integrated into political culture than are their counterparts in the Netherlands." They ascribe this difference in part to the impact of education and the media in the Netherlands, which make it easier for people to stay within their own narrow pillar, and in part to the nature of integration legislation, which in Britain creates incentives for cross-group organization on "the literally superficial basis of 'race'" rather than on narrower national, ethnic, or cultural issues (2005, p. 70). As they conclude, "institutions that are crucial for the transmission of identities, such as the education system and the public broadcasting media are structured in the Netherlands along the lines of cultural political or religious difference, whereas in Britain there is a stronger emphasis on a common public space." In turn, this "has led to a form of ethnic minority representation that is strongly elite-based and focused on cultural identity rather than on combating the harsh socio-economic reality that many Dutch migrants still face" (2005, p. 70).

In sum, integration policy has a measurable impact on the organization of minority groups and on the nature of their participation in national politics. Moreover, I shall show below that it has equally salient implications for the way the polity as a whole reacts to transgressions perceived to be associated with these minority groups. Before we turn to these the reactions, however, it is worth reviewing briefly past and recent experiences with terrorism in each country.

Terrorism

Although the United Kingdom experienced problems with terrorism during the early years of Irish independence, most of this violence ended by the early 1940s. Britain's more recent experiences with terrorism — and with anti-terrorism legislation — date to the early 1970s. On January 30, 1972, British soldiers killed a group of civil rights protesters in Ireland, bringing about the start of "The Troubles." In 1973, London suffered from a concerted IRA bombing campaign, with a total of 36 bombs over the course of the year. Subsequent major incidents took place in 1974 (Guildford and Birmingham), 1982 (Hyde Park and Regents Park, London), 1983 (Harrods' department store, London), 1984 (Conservative Party conference), 1989 (Royal Marines School of Music, Deal), 1992 (two truck bombs, London), and 1996 (truck bombs on London and Manchester). With the exception of the last attack, each of these resulted in one or more deaths.[8]

An admittedly "draconian" Prevention of Terrorism Act was introduced four days after the 1974 Birmingham bombings.[9] The police and the judiciary made full use of their new powers. Indeed, they repeatedly exceeded even these powers, and committed gross miscarriages of justice in convicting the "Birmingham six" and "Guildford four," among others.[10] These unjust convictions were overturned by the late 1980s or early 1990s, and official government apologies (and financial settlements) followed some years later. With the exception of a rocket fired at MI6 headquarters in 2000, Great Britain enjoyed a respite from terrorist attacks for almost a decade after the summer of 1996.

On July 7th, 2005, four coordinated suicide attacks hit London's public transportation system. Three underground trains and a bus were hit; fifty-six people were killed, including the four bombers, and hundreds more were injured. Two weeks later, London was hit by a second set of attacks. However, the bombs in these attacks failed to explode, and all suspects were caught by the authorities. Although Al Qaeda claimed responsibility for the first set of attacks, it is generally assumed that the bombers acted independently and alone.[11]

On July 11th, Tony Blair officially addressed the House of Commons on the topic of the attacks. Most of his statement as well as the debate that followed were focused on the attacks themselves, not on any legislative response they might inspire. On July 20th, however, in the context of a more complete statement on the attacks and the ongoing police investigation, Home Secretary

Charles Clarke also informed the House of Commons that the Government would shortly be putting forward new anti-terrorism legislation. Although he took pains to "stress that these proposals were drawn up before 7 July,"[12] his announcement, and the brief debate that followed, were almost entirely informed by the attacks two weeks prior.

The Dutch have less experience with terrorism on their own soil than do the British. The most visible instances of terrorism prior to the turn of the century were train hijackings in the mid-1970s perpetrated by Moluccan extremists. One such hijacking ended with 3 deaths in 1975. A more extensive operation took place two years later and convulsed the nation. On May 23rd, 1977, two days before a national election, nine young extremists from the Moluccan islands hijacked a train bound from Assen to Groningen, keeping 45 passengers as hostages. At the same time, four of their colleagues occupied an elementary school in Bovensmilde, with 105 children and five teachers.

Despite the ongoing crisis, the government decided to allow the elections to go forward, even though many people feared the hostage crisis would translate into massive support for the extreme right Nationale Volksunie (National People's Union). However, the Dutch public overwhelmingly voted for mainstream parties. Every single one of the four major parties gained seats, while almost all the smaller parties lost. The Nationale Volksunie failed to receive enough votes to capture even a single seat.

The terrorists had initially threatened to blow up the elementary school and all the hostages if their demands were not met by 2 pm on election day, Wednesday. The deadline passed without incident, however, and subsequently the terrorists began to moderate their demands. Eventually the government stormed both the train and the school on June 11th, after nearly three weeks. The action at the train resulted in the deaths of two hostages and six hijackers. Those at the school surrendered peacefully, and all received lengthy prison terms.

No other serious political violence took place in the Netherlands for more than two decades. Nevertheless, Germany's experiences with the Rote Armee Faktion (the Baader-Meinhof Group) were widely reported in the Dutch media, as were the responses of the German authorities. Heinrich Böll's novel *The Lost Honour of Katharina Blum*, as well as the movie based on the book, each of which highlighted the overreaction of the German authorities to the terrorist threat, were critical and financial successes in the Netherlands.

The next instance of political violence in the Netherlands was the murder of the popular and populist right-wing politician Pim Fortuyn in 2002. Significantly, although Fortuyn was killed by an environmental extremist, he had risen to prominence primarily thanks to his arguments about the need for a thorough revision of Dutch integration and asylum policies. Two years later, on November 2nd, 2004, the Dutch movie director and columnist Theo van Gogh, a distant relative of the painter Vincent van Gogh, was murdered while biking through Amsterdam. His attacker, Mohammed Bouyeri, fired seven bullets at him, and made sure

Van Gogh was dead by stabbing him several times in addition with a large knife. Bouyeri also attached an open threat to Dutch parliamentarian Ayaan Hirsi Ali to Van Gogh's body with the same knife.

Hirsi Ali was forced to go into hiding, and did not reappear in the Dutch parliament until January 18th, 2005, more than two months later. A first debate on the murder took place in the Dutch Second Chamber of the States General on November 11th, 2004. In addition, Dutch anti-terrorism legislation was almost immediately tightened. However, as in the British case, the government also announced a more thorough overhaul of anti-terrorism legislation.[13]

Overall, the United Kingdom has a longer and wider-ranging experience with terrorist attacks than does the Netherlands. On the other hand, some of the formative experiences regarding terrorism —and the dangers of over-reacting in response — date to the same period of the late 1970s and early 1980s. Moreover, in both countries there had been a lengthy period of comparative quiet leading up to the incidents of political violence and terrorism in 2004 and 2005.[14] One very striking feature of current debates about terrorism in both countries is the comparative absence of references to any of the earlier experiences described here. The British debate analyzed below featured very few references to IRA terrorism. Similarly, the Dutch debate included no references at all to the terrorist attacks in the 1970s and, even more striking, just a single reference to the murder of Pim Fortuyn — a murder which had happened just two years earlier, but which seems to have been perceived as intrinsically different and not really as a terrorist act with wider implications for Dutch society.

Debating anti-terrorism, extremism, and integration

In the United Kingdom as well as in the Netherlands, a process of reviewing anti-terrorism legislation had been under way for some years. This process had been inspired by the events of September 11th, 2001, and received a further impulse by the bombings in Madrid on March 11th, 2004, exactly two and a half years later. In both countries, however, the task of drawing up and presenting new legislation was given added urgency by the terrorist attacks described above.

The Dutch government presented its promised preliminary outline of its proposed anti-terrorism policy on January 24th, 2005,[15] and the Second Chamber of the Dutch Parliament debated the proposals on February 9th, 2005. It was a lengthy debate, occupying more than 12 hours, and featuring contributions of speakers from every political party represented in the Parliament as well as three government ministers. The fourteen participants in the debate together made 176 contributions covering almost 90 pages in the written record.

The British debate took place 9 months later. The second reading of the Government's Draft Terrorism Bill was held on October 26th. A committee stage followed, followed by a

Category	Argument	Description
Identity	Nationals	Citizens of own country
	Foreigners	Foreigners (visitors or temporary residents)
	Muslims	
	Extremists	Extremists and radicals
	Freedom fighters	Terrorism is in the eye of the beholder
	International network	Part of broader international terrorist network
	New threat	Not comparable to earlier types of terrorism
Cause	Failed integration	Failed integration of immigrant groups
	Incitement	Exposure to radical teachings
	Media (internet)	Exposure to extremist media / websites
	Clash of civilizations	Inherent incompatability between cultures
	Foreign policy	Resentment of (Western) foreign policy
Goals	Democracy	Undermine democracy & rule of law
	Society	Undermine society & stability
	Values	Undermine fundamental values of society
	Anti-Western	Opposed to West in general
	Anti-modernity	Opposed to modernity in general
	Fear / insecurity	Spread fear, foster insecurity
	Political change	Specific political goals
Targets	Elites	Authorities, public leaders
	Civilians	Indiscriminate, any (innocent) civilians
	Property	Sabotage, material damage
	Worldwide	Also concerned with terrorism outside borders

Table 1. Arguments coded regarding the nature of the terrorist threat (23 total).

plenary debate on the amendments that had been proposed at the committee stage on November 9th. It was at this time that the Blair government suffered its first parliamentary defeat, losing a vote on the most controversial component of its anti-terrorism proposal: the extension of the maximum period for preliminary detention from 14 to 90 days. Moreover, it was forced to reconsider the introduction of a legal prohibition on the glorification of terrorism. The third and final reading of the bill followed the next day, on November 10th. Over the course of the three days of debate, 125 different speakers participated, making a total of 350 contributions covering approximately 275 columns in the official record. The debate would have run even longer had the government not restricted quite severely the amount of time allotted for the debate of amendments on November 9th.

These debates provide unparalleled insights into the way the political elites in the two countries think and argue about the issue of terrorism today. As the primary legislative institution in each country, the House of Commons and the Second Chamber are of crucial importance in evaluating, critiquing and approving policy initiatives. Moreover, as democratically elected bodies, they offer as accurate and representative a cross-section of political opinion at the elite level as one can hope to get. Studying their debates, therefore, can both provide us with a sense of how the elite in each country views and approaches the issue of terrorism, and help us

understand the striking differences in anti-terrorism legislation observed between the United Kingdom and the Netherlands.

Analyzing the debates

Two important issues need to be resolved in order to be able to analyze the debates in a systematic way, and thus to make it possible to draw substantive conclusions. First, we must decide how to evaluate the statements of different speakers; second, we need to arrive at a satisfactory way to aggregate the content information across different speakers.

Discussions in the literature on the framing of terrorism (e.g. Norris, Kern, & Just, 2003) as well as ongoing debates in the media suggest a focus on two separate aspects of the debate: the analysis of the problem and the nature of the solution. The first of these speaks to the way political leaders perceive the problem of terrorism: who are the terrorists, what causes them to become terrorists, what are their goals, and what are their targets? Several different answers are possible to each of these questions, and it should be obvious that different answers are likely to be associated with different proposed solutions.

The second category focuses on these proposed solutions. Here we can divide the question into six different components: How

Category	Argument	Description
Society	Outlaw discrim. Inform public	Outlaw discriminatory acts / policies Better information to public (about risks, policies, etc.)
Commmunity	Integration Outreach Prevent radicalization Work within system Differentiate Isolate extremists	Better integration into mainstream society Deliberate outreach & contacts with groups Work to prevent radicalization Promote political action within the system Differentiate between extremists & others Isolate extremists (prevent infection of others)
Networks	Ban organizations Control media Finance	Outlaw extremists, pro-terrorist organizations Ban or shut down extremist website / papers Disrupt financial flows to terrorist groups
Individuals	Remove citizenship Deportation Deny access Preliminary detention Internment Pre-emptive action Control movement Limit civil rights Limit speech Forbid teaching	Strip dual citizens of citizenship (then deport) Deport from the country Prevent extremists from entering country Jail while investigating suspicions Jail to prevent terrorist actions Jail because expect terrorist actions Limit movement, intrusive monitoring Limit rights (speech, movement, voting, etc.) Limit speech (glorification, incitement) Don't allow extremists to preach or teach
Authorities	Coordination (int'l) Extra-territoriality Coordination (dom.) Police powers More resources More personnel Intelligence Personal protection	Coordination with agencies in other countries Apply anti-terror laws extra-territorially Better coordination among domestic agencies More powers for police forces More resources for authorities to combat terror More personnel for anti-terror activities Active intelligence gathering Specific protection of leaders, politicians, etc.
Risks	Parliamentary control International law Counterproductive Abuse Alienation No value Wrong people Wrong governments	Institutionalize parliamentary oversight Run afoul of international legal agreements Counterproductive results (in general) Measures open to abuse by authorities Policy results in alienation of target groups Policy not likely to help address terrorism Policy targets wrong (innocent) people Policies can be exploited by unfriendly govts.

Table 2. Arguments coded regarding possible policy initiatives (37 total).

should we address society as a whole; how should we interact with the social groups from which terrorists emerge; how should we deal with (suspected) terrorist networks; how should we deal with (suspected) individual terrorists; what should be done about the resources and capabilities available to authorities in their efforts; and what are the risks to watch out for in deciding on policy?

We thus have ten separate component categories to watch for in the debate, with a number of possible different arguments or claims in each category. For our purposes, it will be of interest both to analyze the relative weights of these component categories within the overall debate, and to look more closely at patterns within each of the separate categories.

Tables 1 and 2 summarize the different arguments coded in the debates. These lists of arguments were generated by considering issues highlighted in the current academic and journalistic literature on anti-terrorism. In addition, a few specific codes were generated inductively, since speakers in the debate at times made particular distinctions that were not anticipated ahead of time. The most important example, quite salient in the British debate, was a distinction between preliminary detention pending further fact-

finding about possible crimes committed, on the one hand, and preventive detention in order to make sure terrorist acts do not get committed, on the other hand.

Conversely, several arguments which the literature suggested might be important did not arise at all in these debates. For example, no speakers specifically described terrorists as 'immigrants', nor did anyone argue that the teaching in Islamic schools (*madrassas*), or even the nature of Islam itself, were causes of terrorism. As for the policy solutions listed in table 2, no speaker argued for a stop to any further immigration as a policy instrument to prevent terrorism, even though this argument is often heard in the popular media.

It should also be clear from the different arguments listed in table 1 that different arguments can often be mutually compatible. For example, a putative terrorist may simultaneously be a citizen of the country, a member of an immigrant group, a Muslim and an extremist. It will be interesting to note, therefore, which of those characteristics of such a person policy-makers choose to highlight in their arguments.

A total of 60 different arguments were coded overall, although some arguments only arose in one of the two countries. In order to minimize interpretation on the part of the coder, the coding consisted of simply tallying each time a speaker made a particular argument explicitly. If a speaker put forward one argument, then proceeded to make another, only to return once again to the first argument, this argument was tallied twice. This approach resulted in a total tally of 415 arguments in the British case, and 553 in the Netherlands. Not every contribution by a speaker featured any of the arguments in tables 1 or 2: especially later in the debates, speakers sometimes turned to rather technical issues with no direct bearing on any of the arguments of interest to us here. On the other hand, however, a few of the longer speeches featured several dozen tallied arguments.

Content analysis of political debates inevitably requires some judgment calls during the coding process. In order to minimize the impact of such decisions, each debate was coded twice, making it easier to note the most ambiguous claims (which, fortunately, were few in number). Moreover, if claims appeared to be mostly implicit, they were simply not coded. This was the case most significantly for the assumption, clearly shared by many speakers, that the terrorists under discussion were Muslim. In view of these coding decisions, differences in the relative salience of particular claims from one legislator to the next should not be taken to imply that if one were to ask these legislators specific questions they would also give different answers. Instead, these differences reflect the degree to which a speaker felt it important to lay out a particular claim explicitly in the context of discussing the government's anti-terrorism proposals.

Finally, in order to make broader comparative claims about the contents of the debates it is necessary to aggregate the results of the content analysis of individual speeches. The most straightforward approach is simply to add the tallies for all speakers. However, this risks giving excessive weight to particular speakers who put forward many different claims in a short speech, while underweighting those who make a long speech with just a single dominant argument. Probably the best way to address this problem is to weight each speaker's claims by the length of his or her contribution. Short interjections will thus get a much lower weight than longer ones, while within a speech, arguments made repeatedly will weigh more than arguments just mentioned once in passing.

Debate analysis: Framing the terrorist threat and the appropriate responses

Table 3 shows the relative salience of the 10 different categories of argument described above. Several important findings immediately emerge, even at this level of generality. First, British parliamentarians are comparatively much more interested in questions about the nature of the terrorist threat, and, more specifically, about the targets of terrorists. This is in contrast to the Dutch situation, where the issue of different kinds of targets rarely comes up explicitly. The contrast is all the more striking in light of the fact that the precipitating case in the Netherlands — the murder of Theo van Gogh — was very specific in terms of target. For Dutch parliamentarians, however, the focus is on terrorism as a threat to any and all, and there is comparatively little interest

	United Kingdom	Netherlands
Nature of threat (total)	*0.239*	*0.141*
Identity	0.109	0.082
Cause	0.012	0.008
Goals	0.045	0.045
Targets	0.073	0.006
Nature of solution (total)	*0.515*	*0.785*
Polity	0.000	0.031
Groups	0.124	0.168
Networks	0.007	0.098
Individuals	0.268	0.247
Authorities	0.117	0.242
Risks & appropriateness	*0.246*	*0.073*

Table 3. Relative salience of main categories (totals sum to 1).

	United Kingdom		Netherlands
Nationals	0.099	(0.176)	0.072
Foreigners	0.018	(0.032)	0.072
Muslims	0.186	(0.330)	0.433
Extremists	0.247	(0.438)	0.303
Freedom fighters	0.438		0.029
Margins of society	0.013	(0.023)	0
International network	0		0.091

Table 4. Arguments about the identity of terrorists (totals sum to 1). In parenthesis for the UK, values recalculated to exclude the 'freedom fighter' argument.

in analyzing whether particular targets are more vulnerable than others.

Whereas the British members of parliament are comparatively more interested in the nature of the terrorist threat, their Dutch colleagues focus more on different types of possible solutions. The share of total statements tallied in the debates accounted for by arguments about aspects of the solution was almost 80% in the Dutch case, compared to just over 50% in the British case. Of particular interest here is the fact that the Dutch parliamentarians talk much more about addressing networks of terrorists and extending the powers of the authorities, while arguments in Britain more often focused on dealing with particular individuals. As the last row in table 3 shows, moreover, the British were much more concerned with the appropriateness and relevance of particular measures, a consideration which played only a minor role in the Dutch debate.

The picture that begins to emerge from table 3 is one of two societies confronting the new terrorist threat in rather different ways. The British focus on particular targets, try to understand the nature of the threat, worry about the appropriateness of the anti-terrorism measures, and focus on dealing with the terrorists as individuals. The Dutch, in contrast, are rather less interested in particular targets or the nature of the threat more generally; these appear to be taken for granted. Instead, they focus on dealing with terrorists as part of a larger group and look for solutions more

towards granting the authorities greater powers. The next few tables illustrate these differences in greater detail.

Table 4 breaks down the different categories of identities ascribed to terrorist actors by the parliamentarians in their respective debates. The most striking item here is the frequency with which British parliamentarians consider the issue of terrorism in a global context and make arguments about the relativism of the notion of terrorism: "one man's terrorist is another man's freedom fighter". In the British debate, more than 40% of all references to the identities of terrorists fell into this category, where in the Netherlands the comparable figure was just 3%. The figures in parentheses in table 4 give the results for the British case if we exclude this category, thus focusing primarily on the descriptions of terrorists that might operate on the home soil of each country.

Here, too, some important findings emerge. The Dutch are considerably more likely to emphasize the perceived importance of the Muslim identities of current terrorists. The British, in contrast, rather more often refer to them simply as extremists. The British are also more likely to concede that these terrorists may well be home-grown, even though recent terrorist activities in *both* countries have been characterized by the involvement of nationals. As Conservative MP Ellwood, argued, "I do not understand why we are not addressing the fundamental issue of why British citizens decide to kill other British citizens" (26 Oct. 2005, col. 404). Finally, in line with the pattern already discussed above, the Dutch more often emphasize the involvement of terrorists at home with international networks such as Al Qaeda.

With table 5 our focus shifts to the proposed solutions. The table gives the relative salience of different solutions within the broader category of initiatives that address the groups from which terrorists are perceived to derive. Here we see that the British are rather more likely to privilege outreach to these groups, whereas the Dutch are comparatively more concerned with improving the integration of these groups into the overall society. The British, unlike the Dutch, are actually comparatively satisfied with their own integration policy. As Home Secretary Charles Clarke argued in his statement opening the debate on Oct. 26th, "[ours] has been a stunningly successful model of integration, despite regular challenges" (col. 323). When the focus shifts to differentiating between potential terrorists and immigrant groups, the British show themselves to be much more interested in differentiating clearly between the two categories, so as to underscore that the terrorists do not represent immigrants overall. The Dutch, on the other hand, prefer to look to measures that would isolate extremists from their social groups, making it harder for them to disseminate their

	United Kingdom	Netherlands
Integration	0.197	0.268
Outreach	0.571	0.343
Prevent radicalization	0	0.110
Work within system	0.099	0.083
Differentiate	0.091	0.014
Isolate extremists	0.042	0.183

Table 5. Arguments about treatment of immigrant groups (totals sum to 1).

	United Kingdom	Netherlands
Deportation	0.027	0.078
Denationalize	0	0.057
Deny access	0.179	0.020
Detention	0.029	0.052
Internment	0.111	0.175
Pre-emption	0.010	0.265
Constrain actions	0	0.034
Limit rights	0.137	0.088
Limit speech	0.508	0.177
Limit teaching	0	0.052

Table 6. Arguments about treatment of individuals suspected of terrorism or terrorist sympathies (totals sum to 1).

ideas throughout these groups, which by implication are feared to be relatively susceptible to these ideas.

Table 6 turns from the treatment of social groups to the way individual suspects are to be handled. Here, too, the patterns line up with the broader picture. The Dutch are rather more interested in withdrawing the citizenship of terrorist suspects, if possible, and deporting them. This highlights once again the degree to which terrorists are seen to be somehow alien to Dutch society, even if in legal terms they belong to it as citizens.

The Dutch are also much more willing to deal with suspects in punitive fashions, as seen from the frequency with which detention, internment, and pre-emption through detention are mentioned as possible solutions. The latter category, which calls for placing in custody those who are suspected to be harboring terrorist intentions — without concrete knowledge of particular plans — especially underscores the differences between the two countries. It accounted for over a quarter of all Dutch arguments about solutions dealing with individual terrorist suspects, compared to just 1% of such arguments in the British debate. Those Dutch parliamentarians who advocated a solution along these lines did not seem particularly bothered by its potential

	United Kingdom	Netherlands
International coordination	0.247	0.074
Extraterritoriality	0.004	0.032
Domestic coordination	0.060	0.398
Police powers	0.091	0.079
Official resources	0.073	0.063
More personnel	0.069	0.084
Information-gathering	0.456	0.070
Protect individuals	0	0.199

Table 7. Arguments about activities of authorities in anti-terrorism struggle (totals sum to 1).

implications. As representative Eerdmans (Lijst Pim Fortuyn) claimed, "If we put everyone into prison, as the LPF is proposing, we will eliminate a lot of problems" (9 Feb. 2005, p. 48-3056). A little while later, he argued that "innocent citizens will hardly notice anything of the anti-terrorism initiatives" (ibid., p. 48-3059).

The final table looks at the distribution of arguments within the category of activities and powers of the official authorities. As table 3 showed, this category is about twice as salient overall in the Netherlands as it is in Britain. Patterns within the category provide interesting insights as well. Most striking is the contrast between the focus on more extensive and more accurate intelligence gathering in Britain, on the one hand (46% of the arguments in this category, compared to just 7% in the Netherlands), and the emphasis on tighter coordination between different domestic law enforcement groups in the Netherlands, on the other hand (40%, compared to 6% in Britain). A major issue here for Dutch parliamentarians is how to make sure suspects cannot skirt around different anti-terrorism provisions in Dutch law. Green Left representative Halsema expressed this concern by noting that "International Islamist terrorism largely ignores our national laws" (9 Feb. 2005, p. 48-3067).[16]

Discussion

Overall, the picture that emerges from an analysis of the two debates on anti-terrorism legislation is one of very different attitudes towards the threat as well as to different possible solutions. The British political elite tends to view terrorism as the behaviour of extremists. In theory, extremists can emerge at any time and in any group. The fact that the current threat seems to emanate large from Muslim circles, therefore, cannot and should not be used to conclude that these circles are particularly predisposed to terrorism or are any less British than other groups in British society. To deal with the terrorist threat, it is crucial to do one's homework and investigate any potential suspects very thoroughly before taking any further steps. Moreover, suspects should be dealt with as individuals, and it is important to figure out which particular targets they, as individuals, might be interested in striking. Finally, overreaction by authorities, as well as indiscriminate actions that also ensnare innocent people, are to be avoided if at all possible.

In contrast, the Dutch political elite sees the current terrorist threat as being linked to specific groups in Dutch society. Since support of terrorism at home is fundamentally incompatible with the norms of Dutch society, these groups are therefore

less Dutch, and in some intrinsic sense alien. This is evidenced also by the fact that they have connections to similar groups abroad. To deal with the terrorist threat, therefore, it is important to eliminate this alien element from Dutch society. This can be done by expelling particular individuals, if possible; by placing them in detention, if not; and by making sure that they interact as little as possible with those factions of their communities that are not yet 'infected'. Even those who are sympathetic to terrorist acts but have not committed any crimes themselves are 'alien' in the sense the terrorists are; as a result, we need not worry that much about ensnaring (and hence alienating) innocent people, regrettable though this may be.

Of course these characterizations are somewhat overdrawn. Moreover, it is hardly the case that everyone in the Netherlands or the United Kingdom thinks exactly alike about the issue of (anti-)terrorism. It is not too difficult to find British MPs who express many of the sentiments just ascribed to the Dutch elite, and *vice versa.* Similarly, many of the more extreme proposals put forward by Dutch parliamentarians have also been discussed in the British national media, even if not necessarily within the House of Commons. However, the aggregate patterns are quite different, as we have seen. Moreover, these differences do not arise simply from differences at the extremes of the political spectrum; instead, they are found from left to right in each parliament.

As I argued earlier, the national patterns cannot be explained by earlier experiences with terrorism, nor by differences in terms of the nature of the current terrorist threat. Instead, they derive from differences in the way the terrorist threat is linked to larger national debates on the integration of minorities. There has been simmering discontent with the effects of Dutch integration policy for some years, and the current terrorist threat is framed against the backdrop of this discontent. More fundamentally, Dutch integration policy has been based on a number of crucial assumptions, and the murder of Van Gogh showed these assumptions to be wrong.

Lijphart's model of consociationalism assumed that the leaders of different social groups were legitimate, had authority over their groups, and thus could keep them under control. In addition, it was assumed that these leaders as well as their followers subscribed to a number of fundamental norms constituting the Dutch polity, not least of which was its fundamental legitimacy as a polity. The former assumption has become increasingly invalid over time for all social groups in the Netherlands and abroad. The latter assumption almost certainly was invalid for immigrant groups from the very beginning, but Dutch integration policy simply proceeded as though it were valid, ignoring the possible consequences of being wrong.

Some of these consequences are now playing out quite visibly in the Dutch political discourse. For those who have been dissatisfied with Dutch integration policy for some time, the murder of Van Gogh offered tangible evidence of its failure. For those who continue to believe in the value of Dutch integration policy, the murder of Van Gogh can only mean that this policy has been applied to some groups that are fundamentally alien and

thus do not belong in the Netherlands. Both sides thus frame anti-terrorism within the broader context of integration policy.

The United Kingdom offers a striking contrast. Here, too, there is some dissatisfaction with integration policy. However, British integration policy never made as many assumptions about immigrants as did Dutch policy, nor did it place as many demands on how immigrants were expected to behave and feel. The fact that some members of immigrant groups turn into extremists thus neither indicates that the overall policy is flawed, nor does it give opponents of the policy much fuel for their arguments.

Broader national discourses

Although the focus here has been on the political elite as represented in the respective parliaments of the two nations, it is worth noting that similar differences also characterize the broader political debate in each country. A major participant in the broader Dutch debate on integration policy has been Paul Scheffer, who published an essay entitled "The Multicultural Drama" in *NRC Handelsblad,* the leading Dutch newspaper, on 29 January 2000. He argued that Dutch policy revealed "a limitless confidence in elites," and he challenged the assumption of many that "the rules and norms of consociational democracy can also moderate newer distinctions."

His essay evoked a lot of heated debate and he responded two months later, arguing that "If the Netherlands claims to be an 'immigrant nation', then it must do what every immigrant nation does, namely emphasizing instruction in language, history and the rule of law. During the era of Dutch pillarization, these were the sources of shared national identity that prevented cultural differences from degenerating into conflict." (*NRC Handelsblad*, 25 March 2000). In the aftermath of Van Gogh's murder, the debate has shifted to the issue of anti-terrorism policy, but almost always within the broader frame of integration policy.[17]

The comparatively stronger reaction of the Dutch elite and authorities has been noted internationally as well. Moreover, international commentators have often framed Dutch anti-terrorism policy in terms of the failure of Dutch integration policies, just as the Dutch themselves do. For example, an article in the *Washington Times* on March 15, 2006, noted that "the members of the Hofstad [terrorist] group are living examples of the failed integration of large segments of the local Muslim population." (Lorenzo Vidino. "Dutch get tougher on terror"). Similarly, the Canadian *National Post* argued on 26 January, 2006, that with its turn to the right, "Increasingly, … Holland is in some ways an inversion of its former self." The article concluded by noting that "Van Gogh's murder is often referred to as the Sept. 11 of the Netherlands, but, in some ways, its effects on Dutch society have been far more profound" (Abigail R. Esman, "Holland, inverted").

Others take a more measured view. In a long article in the *New Yorker*, Ian Buruma noted that "The general trend was rightward, and toward an atmosphere of perhaps exaggerated anxiety."

Buruma also argued that "The integration of Muslims has not been a greater failure than anywhere else. But the country may have been less prepared for the holy war" (Buruma, 2005). In a more recent *New Yorker* article, Jane Kramer pointed out that:

> It could be said that each European country misreads its immigrants in its own way and that way becomes a kind of self-portrait. France assumed that it could turn millions of poor North African workers into French republicans by conferring citizenship on their children at birth. Germany practiced *jus sanguinis*, and never even opened the possibility of citizenship to its two million Turks until the late nineties. But it's safe to say that no country was as smug as Holland in its particular misreadings… (Kramer, 2006)

Kramer points to the flawed assumptions of Dutch integration policy as particularly problematic, in ways that echo Paul Scheffer: "It wasn't so much that they didn't adapt to Dutch culture and Dutch law; they kept to themselves, they spoke in their own language, and, apart from their jobs, they hardly knew there was such a thing as Dutch culture or Dutch law." Kramer also criticizes the overreaction of Dutch officials: "The Minister for Immigration and Integration is a former prison warden named Rita Verdonk, whose solution to any problem involving immigrants is to throw them out" (Kramer, 2006).

In contrast, the discussion about British anti-terrorism policy has been much more focused on the policy initiatives themselves. Blair's defeat in the House of Commons was widely reported, but rarely with any reference to integration policy. Indeed, when a broader frame is invoked, the reference is more commonly to international relations and foreign policy than to domestic policies. For example, Peter Oborne published a long essay in the *Independent* on 15 February 2006 entitled, "The Politics of Fear (or How Tony Blair Misled Us over the War on Terror)," which linked anti-terror policy to the war in Iraq.

Conclusion

Many people, both within the Netherlands and internationally, have noted the comparatively severe policies implemented by the Dutch authorities in the struggle against terrorism; policies which seem at odds with the long-standing reputation of the Netherlands as a tolerant and easy-going country. I have argued that this unexpected behaviour by Dutch officials can be explained by the way the terrorist threat is viewed through the prism of Dutch integration policy. The contrast with the United Kingdom is quite striking. Here, observers both at home and abroad have commented with admiration on the restrained British response to the terrorist attacks of the summer of 2005. This, too, was unexpected, given official responses to IRA terrorism in earlier periods. Here, too, I have argued it matters greatly how the terrorist threat is framed. In the United Kingdom, terrorist acts are largely seen as the acts

of extremist individuals, not of individuals as representatives of suspect groups.

The debates analyzed in this paper illustrate and underscore this difference between the two countries. The arguments put forward by representatives in the respective parliaments of the two nations reflect the different frames through which the issue of terrorism is perceived. In the Netherlands the emphasis is on Muslims, on people who are fundamentally 'alien', and as a result, on firm (some would say excessive) policy initiatives. In Britain, in contrast, the emphasis is on extremist individuals, who may or may not be British, but who are above all individuals. As a result, the most important policy initiative is to be more pro-active and thorough in intelligence gathering so as to identify these individuals and put together legal cases against them.

The policy initiatives introduced by the two governments, as well as the reactions to these initiatives among the broader political elite in each country, each show that the differences identified here go beyond rhetoric and discourse. How political leaders think about and talk about the issue of terrorism has important implications for the nature of the solutions they are likely to put forward. Moreover, it has implications for the way government proposals will be received by the legislature. As we saw in the Netherlands, almost all political parties were broadly receptive to the initiatives proposed by the Dutch government. In contrast, the House of Commons was far more skeptical towards the British government's proposals.

In sum, this paper has shown that political elites in the two countries talk about (and think about) terrorism differently. These differences cannot be traced to earlier experiences with terrorism in either country or to the nature of the current threat. Moreover, how elites talk and think about terrorism has important implications for the shape of anti-terrorism legislation in a country. Finally, the differences we have observed can be explained by the broader backdrop against which the terrorist threat is framed and, more specifically, by the perceived connection (or lack thereof) between the new terrorist threat and long-standing policies aimed at integrating immigrant groups. ■

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Endnotes

1   House of Commons debate on the Terrorism Bill, 26 Oct. 2005, col. 323.

2   Throughout the paper, the term 'Islamist' will be used to refer to the particularly rigid, fundamentalist interpretations of Islam associated with extremist activities among their supporters.

3   Lustick (1997) offers a powerful critique of this concession and others like it made by Lijphart as new evidence seems to challenge his consociational research program. As a research program, Lustick argues, Lijphart's theory is, in Lakatosian terms, degenerate. As the Dutch experience described here shows, its value in terms of policy prescription can called into doubt too.

4   Quotations from (Kramer, 2006).

5   Ton Huitink: "Behoefte aan Islamitische Scholen Groot," ANP wire article, 20 March 2006.

6   The newspapers studied were the *NRC Handelsblad* in the Netherlands and *The Guardian* in the United Kingdom.

7   In light of the pillarized approach to such relations in the Netherlands, this finding is not that surprising, however — the traditional Dutch model is one where involvement in national issues is not deemed to be particularly important or necessary, as long as the rights of one's pillar seem to be assured.

8   Donald MacLeod, "London: Past Terror Attacks", *The Guardian*, 7 July 2005.

9   The characterization is by the Home Secretary, presenting the policy in the House of Commons, 25 November 1974.

10 Donald MacLeod, "London: Past Terror Attacks", *The Guardian*, 7 July 2005.

11 "Leak reveals official story of London bombings." *The Guardian*, 9 April 2006.

12 House of Commons *Hansard*, 20 July 2005, col. 1254.

13 Some people have argued that Van Gogh's murder was a politically motivated assassination, not an act of terrorism. Neither Bouyeri nor his colleagues in the so-called Hofstad Group appear to have had plans to attack random civilians — they were quite narrowly focused on particular targets such as Van Gogh and Hirsi Ali. However, the Dutch public and the authorities clearly and explicitly have reacted to the murder as an act of terrorism. Moreover, even average Dutch citizens felt threatened and unsafe in the aftermath of Van Gogh's death ("Nederland zonder van Gogh", *HP/De Tijd* 2 November, 2005). In other words, while the act may not have been terrorist by strict definitions of the term, its impact was similar to that of a successful act of terrorism.

14 The murder of Pim Fortuyn broke this period of quiet in the Netherlands, but had much less impact on Dutch society overall than did Van Gogh's murder.

15 Tweede Kamer 2004-2005, doc. 29754, nr. 5.

16 Notice also the emphasis here on terrorists as 1) Muslim, and 2) part of an international network.

17 See e.g. (Hajer & Marcussen, 2004), which explicitly discusses reactions to Van Gogh's murder in terms of frames.

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