

Concept Paper

Secularism and the Governance of Religious Diversity

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This paper seeks to develop an analytical reflection on the normative basis for state-religion relations and the governance of religious diversity. It is also a sociological reflection on viable forms of religious diversity governance.

The aim of this Concept Paper – one of three in a series - is to provide a conceptual cornerstone for the research being conducted in GREASE, an EU-funded project investigating religious diversity, state-religion relations and religiously inspired radicalisation on four continents.

<https://www.grease.eui.eu>



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The EU-Funded GREASE project looks to Asia for insights on governing religious diversity and preventing radicalisation.

Involving researchers from Europe, North Africa, the Middle East, Asia and Oceania, GREASE is investigating how religious diversity is governed in over 20 countries. Our work focuses on comparing norms, laws and practices that may (or may not) prove useful in preventing religious radicalisation. Our research also sheds light on how different societies cope with the challenge of integrating religious minorities and migrants. The aim is to deepen our understanding of how religious diversity can be governed successfully, with an emphasis on countering radicalisation trends.

While exploring religious governance models in other parts of the world, GREASE also attempts to unravel the European paradox of religious radicalisation despite growing secularisation. We consider the claim that migrant integration in Europe has failed because second generation youth have become marginalised and radicalised, with some turning to jihadist terrorism networks. The researchers aim to deliver innovative academic thinking on secularisation and radicalisation while offering insights for governance of religious diversity.

The project is being coordinated by Professor Anna Triandafyllidou from The European University Institute (EUI) in Italy. Other consortium members include Professor Tariq Modood from The University of Bristol (UK); Dr. H. A. Hellyer from the Royal United Services Institute (RUSI) (UK); Dr. Mila Mancheva from The Centre for the Study of Democracy (Bulgaria); Dr. Egdunas Raciunas from Vytautas Magnus University (Lithuania); Mr. Terry Martin from the research communications agency SPIA (Germany); Professor Mehdi Lahlou from Mohammed V University of Rabat (Morocco); Professor Haldun Gulalp of The Turkish Economic and Social Studies Foundation (Turkey); Professor Pradana Boy of Universitas Muhammadiyah Malang (Indonesia); Professor Zawawi Ibrahim of The Strategic Information and Research Development Centre (Malaysia); Professor Gurpreet Mahajan of Jawaharlal Nehru University (India); and Professor Michele Grossman of Deakin University (Melbourne, Australia). GREASE is scheduled for completion in 2022.

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GREASE - Radicalisation, Secularism and the Governance of Religion: Bringing together European and Asian Perspectives

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Secularism as the Governance of Religion

This paper seeks to develop an analytical reflection on the normative basis for state-religion relations and the governance of religious diversity and a sociological reflection on viable forms of religious diversity governance. To this end it develops a discussion of thinking around models and varieties of secularism (the governance of religion) and religion-politics relations, and then considers a series of concepts relating to religious diversity.

The paper thus presents the conceptual framework for one of the central aspects of the GREASE project, namely the relationship between secularism and the diversity of religious governance. The project is a European engagement with certain other parts of the world. Thus we offer a characterisation of a mainstream Western European mode of political secularism, so that we may then ask how well it can be adapted to meet the governance of the new post-immigration multi-faith diversity of Western and other parts of Europe, and to what extent it illuminates and/or can be adapted to meet the circumstances of some other parts of the world. Equally importantly, what can be learnt from other parts of the world that can be helpful for the governance of religious diversity in Europe?

We address these questions by explaining what we mean by political secularism and then go on to briefly offer a history of the emergence, development and diffusion of political secularism as well as resistance to it and consequent adaptations. It sets out characteristics of trends of secularism and a typology of varieties of secularism that can be discerned. We then present the dominant contemporary version of the governance of religion in N.W. Europe. Turning to diversity, it explores six pro-diversity concepts; it suggests that while each is important, three are insufficient. It, however, goes on to identify three that can offer an understanding of the governance of religious diversity and so on which the GREASE project can be built on. This leads to the question of how concepts can be applied in different regions of the world by briefly outlining a method of iterative contextualism or cross-contextualism.

‘Crisis of secularism’?

There may be various reasons to rethink political secularism but the most significant today, certainly in Western Europe, is the multicultural challenge. It is clear West European states are now highly exercised by the challenges posed by post-immigration ethno-religious diversity and that, despite a long history of Muslim presence on the continent, it is the new Muslim settlements of the last fifty years or so that are at the

centre of it.¹ For some the pivotal date is 9/11, but 1988-89 better marks its origins as that was the period of *The Satanic Verses Affair* in the UK and *l'affaire foulard* in France (Modood 2012). Moreover, emerging out of processes precipitated by the collapse of Communism in Europe in 1989, coupled with, and fuelled by, recent socio-economic crises in Europe “fears and suspicion towards minority claims are coupled with a renewed emphasis on the nation state as the most important geopolitical and socio-economic unit” (Triandafyllidou, 2017: 28). This brings nation and religion into a “dangerous liaison”, where “nation provides for solidity and safety in a globalised world while religion provides for a convenient Significant Other at the national and global levels against whom to ascertain cultural and political superiority” (ibid: 29).

Moreover, it is during this period that political theorists from outside the west begin to make prominent contributions to political thinking and theorising on debates about secularism, many bringing an alternative perspective to western debates and issues. These contributions themselves were provoked by both issues arising in the west as well as in the country or region of the writer. This can be seen in the work of Talal Asad, whose genealogical interest was as much in the colonial secularism of Egypt as with how countries like Britain and France were managing their new Muslim populations (Asad 1993 and 2003). Rajeev Bhargava (1998) was one of the first to spark the normative debate, bringing a perspective derived from India. His intervention was provoked both by considerations and debates in India, notably the Shah Bano case in 1985 and the demolition of Babri Masjid in Ayodha in 1992 (marked in India as major blows to its state secularism), as well as addressing the perceived ‘crisis’ of secularism in the west that Bhargava highlighted and that underpins his contributions to the Anglophone debates.

In Europe, especially Western Europe, secular politics and decline in belief in and scope of religion, shows no sign of reversing the long term fading away of Christianity. Many Europeans are happy to think of their countries and their continent as post-Christian. The re-thinking of secularism in Europe is largely due to the fact of religious diversity in a context of pro-diversity sensibilities and ethics rather than a reversal of previous declines. Groups and controversies defined in terms of race or foreignness came to be redefined as well as self-define in terms of religion and how the accommodation of Muslims came to be the dominant issue in relation to multiculturalism has now been well established (Modood, 2005 and 2007/2013). Such dynamics have been captured by what Levey refers to as three intersecting ‘fault-lines’; these being, religion-politics, religion-multiculturalism, and Islam-Muslims/multiculturalism² (2009: 2), which have emerged subsequent to each other but continue to dynamically intersect rather than represent sequential replacement. It is important to note here though variation within Europe, where countries in Eastern and Southern Europe report higher degrees of religiosity and higher levels of importance for religion as a core part of national identity

¹ As Akbar Ahmed nicely put it, these settlements mark a Europe-Islam ‘encounter of the third kind’, the previous two being the centuries when Muslims ruled over parts of Europe -Spain and the Balkans – and when Europeans ruled over nearly all the Muslim world (Ahmed 1989).

² It should be noted that in this section ‘multiculturalism’ is meant in its descriptive sense, denoting ethnic and religious diversity, rather than its substantive theoretical sense, on which see p.16 below

than do Western European countries (Pew, 2018), while also exhibiting early stages of the secularisation that characterises Western Europe. At the same time there has emerged a backlash against multiculturalism, which sometimes harks back to a **Christian European identity** and sometimes asserts a **secular Europeanism**.

What is Political Secularism?

As a starting point, we can distinguish between three analytically distinct levels of what might be meant when talking about the secular: metaphysics, sociology, and politics. The first, metaphysics, relates to beliefs about what ultimately exists, e.g., theism or atheism. The second, sociological level, relates to ways of living, social organisation, personal and family activities and religious practices. The third, politics, relates to political arrangements and the place of religion as part of these arrangements. It is with this level that this paper is directly concerned. Notably, you can be a secularist in any one of these without being so with regard to the other two. For example, a theist can be a political secularist; or, an atheist or an agnostic may like attending religious services for cultural reasons. Even in the communist Republic of China, for example, “religious activity seems to be embedded in a fully secular life” (van der Veer, 2012: 725).

With this focus and toward the aims stated above, we adopt a minimalist definition of political secularism. This minimalist definition offers two distinct advantages. Others tend to start with freedom of religion or toleration. but they then cannot explain in what ways plainly secularist regimes like the former USSR and China are secularist states. Moreover, too thick a definition of secularism with, for instance, a focus on a strict church-state separation may fail to see states with state-religion connexions of various extents and types as ‘properly’ secular. This is significant not least because “no country worldwide can be classified as adopting the pure, theorized ‘separation’ model” (Perez and Fox, 2018: 2). Indeed, nearly a third of all western democracies have an official religion and more than half of all 47 democracies in the Polity data-set officially or unofficially give preference to one religion. Most of the others give preference to more than one religion (Perez and Fox, 2018). It is better, then, to start with what all secularisms have in common and then build up a normative account of, for example, liberal secularism, democratic secularism, moderate secularism, or multiculturalist secularism etc. It is clear that all of these are based on principles and values that can be made compatible with a version of secularism but that each goes beyond bare secularism. This way also allows us to see that there is a variety of political secularisms – both normatively and across the world - and the ways in which they differ.

The minimalist definition of political secularism offered is:

“The core idea of political secularism is the idea of *political autonomy*, namely that politics or the state has a *raison d’être* of its own and should not be subordinated to religious authority, religious purposes or religious reasons” (Modood, 2017: 354).

This core idea of political secularism though is a one-way type of autonomy. Secularism can additionally be supportive of autonomy of organised religion and freedom of religion too, as in the USA, but it does not have to be. Where there is a two-way autonomy, it does not mean strict separation of the type characterising the USA. It is consistent with some government control of religion, some interference in religion, some support for religion, and some cooperation with (selected) religious organisations and religious purposes. Nevertheless, state control and support of religion must not compromise the autonomy of politics and statecraft: it must be largely justifiable in political terms, not just religious reasons, and it must not restrict (but may support) political authority and state action (Modood 2012).

Mutual autonomy – but not strict separation – has historically emerged as the liberal democratic version and the one that is most widespread today. For such secularists, religious freedom is one of the most essential and cherished political values. In that sense, secularism is a secondary concept, dependent on the concept of religion. However, once there is a concept of secularism – with advocates, promoters, supportive monarch, armed militants, and so on – then it has a dialectical relationship with religion. Secularism is not merely defined as ‘the other’ of religion. It also redefines religion, intellectually and politically, to suit secularist values and purposes (Asad 2003). In this way, in secularist countries what we regard as religion today (an ‘inner life’, a ‘belief’, a private matter) is a much more socially restricted set of activities, relationships, and forms of authority than was the case before secularism’s rise to power, or than what prevails in non-secularist countries today. Once an outgrowth of religious arrangements (‘secular’ orders of monks were those unconfined to monasteries), secularism has come to define or redefine religion and its proper place in many countries in the world.

New thinking about political secularism has suggested that secularism is, in its essentials, really about ‘managing diversity’ (Taylor 2009; also Taylor 2014). This has a contemporary pertinence; indeed, it emphasises what is central yet under-appreciated today, but it cannot be right as a definition of political secularism. If there was no religious diversity in a country or in the world, if only one religion was present, there would still be a question about the relationship between religion and politics and ‘political autonomy’ would still be a suitable answer.

Moreover, secularism is not an answer to questions about *any* kind of diversity (such as linguistic diversity). It arises specifically in relation to religion, to the power and authority of religion, and the challenge it may pose to political rule or, say, equality amongst citizens (Bilgrami 2014). We should not attribute liberals’ concern to not treat religion as special (Eisgruber and Sager 2009) to secularism. For secularists religion *is* special; their concern to delimit the sphere of religion is not extended to economics, science, the arts and so on but is singularly targeted on religion. The special delimiting of religion is also evident in liberals’ calls for religious identity to be depoliticized in a way that would not be asked of ethno-cultural identities when it comes to the advocacy of respect for ‘difference’ (e.g. Kymlicka, 1995).

Talal Asad – who can perhaps claim to be the founder of an influential approach to the study of secularism in the Western academy – has argued that the very concept of religion as a bounded, legally tolerated and regulated activity is an invention of Western elites, first imposed on Western societies and then imposed on the rest of the world (Asad, 1993, 2003). Indeed, there does seem to be a point here. While philosophers, scientists and artists define what is and is not philosophy, science and art respectively (even where that is internally contested within these activities and changes over time). Yet, at least in the modern West, the state and political movements are involved in defining and regulating what is and is not religion. If relations between the state and the economy is a defining question of later modernity in the West, its predecessor question – the question of early modernity – is that of the relation between the state and organised religion. It is a question which by the third quarter of the twentieth century seemed more or less settled in the West but which has re-emerged towards the end of the twentieth century.

Historical trends

A. From the West

Historically, at least in the West, religion and politics, church and state have enjoyed various linkages and the emergence of democratic Europe was gradual and evolutionary (shorn of the teleological connotation sometimes associated with this term). These linkages began to be reduced in the nineteenth and twentieth centuries and we might see four related developments (Casanova, 1994). The long-term origins of this movement can be traced back to the Reformation (see also, for example, Gregory, 2012). Initially, the linkages between religion and politics became more intense as religion became the basis for rebellion, civil war and international conflict for more than a century. The Treaty of Westphalia (1648), building on the Treaty of Augsburg (1555), is marked as the moment when it was recognised that peace in Western Europe was only possible if each country was allowed to have an official state religion while at the same time desisting from persecuting dissenters and minorities. The formation of nation-states and normalising of state religions was in some ways the opposite of secularism, but it established that states had a right to regulate religion within their borders and led to a process of religious and cultural homogenisation, the norms of which prevail in the public domain today (Mahajan, 2017: 79). From the Westphalian settlement of *cuius regio, eius religio* a trajectory that would pass through ideas of religious tolerance, to state neutrality and privatised religion was set in motion. The third and fourth developments related here are the growth of modern capitalism (and the ‘spirit’ of capitalism), and the early modern scientific revolution. Together, these developments resulted in the gradual and increasing circumscription of religion from areas of politics and social life. Secularism proper – or at least a more developed version – emerges with the American revolution (1776) which led to the disestablishment of a state religion *in the name of religious freedom*; and the French revolution (1789), with its ideal of *freedom from* religion, at least in the public sphere. Nevertheless, most of Western Europe followed a gentler path, neither the strict state-religion separation of the US, nor the denuding of the public sphere in the manner of French *laïcité*.

Laïcité, however, became part of socialism, especially revolutionary Marxism-Leninism, which legitimised the suppression of religion, as well as of the Turkish state founded in 1923. The latter's approach to modernisation involved control and utilising of Islam rather than a communist eradication of religion. In Western Europe, state-religion connexions persisted but they were gradually lessened as on the one hand churches had less influence on political affairs and, on the other hand, disabilities against Christians of the non-dominant denomination and against Jews were relaxed and finally abolished.

B. Alternative trends

European powers took these secularist ideas and practices with them as they instituted global empires. In some cases, such as East Asia, the categories of religion and secularity began entering non-western contexts in the mid-sixteenth century, even if their definitions remained comparatively unformed from what they would later become, and these early modern colonial encounters would play an important role in these categories entering non-western discourses more prominently from the end of the 18th century and the period of western colonial hegemony (Casanova, 2018). India's development of secularism owes something to the British colonial administration's entrenching of religious differences based on textual sources, rather than the diverse and overlapping patterns of practices (Mahajan, 2013: 71-72). Subsequent anti-colonial movements included the radically secularist, as in the case of Mao in Communist China, but also resistance to secularism. Gandhi, for instance, infused Indian nationalism, especially at the level of the masses, with an ethical or spiritual Hinduism or religious pluralism, becoming the first nationalist to **mobilise masses through a religion**. Mohammed Ali Jinnah, not a strictly practising Muslim, responded with a **religious nationalism** specifically designed for Indian Muslims, which led to the creation of Pakistan in 1947, the first **modern state based on a religious identity**. Yet, at independence Indian debates over the relation of religion and the state in India reflected a range of views that in some ways drew on a framework of a liberal democratic imaginary but which, importantly, mediated these through alternative frameworks of understanding and meaning drawing on India's history, its present and distinctive challenges in managing multi-dimensional diversity, and an imagined for future (Mahajan, 2013). This would produce a distinctive model of secularism and contributions to political theory on secularism. There are, then, important contextual differences between non-western and western models that bear directly on the debates and forms of secularism in different regions and countries. In the West, following the Treaty of Westphalia, polities had been (made) religiously homogenous to a significant extent. By contrast, India, for example, was characterised by a deep religious diversity and difference such that at the time of Independence the issue of community-specific rights for religious groups could not be ignored in the writing of the constitution (Bhargava, 2009).

A year after Pakistan, a second religious-identity state, Israel, was founded, and notably by secular Jews, albeit with numerous concessions to leaders of Orthodox Judaism. In these states, a religious identity has been used as a form of collective identification around which to organise for purposes of statecraft or political mobilisation and,

moreover, may be mobilised as such by those for whom it operates in a secular rather than religious way. That is, the weight of religious identity may fall as much, if not more than or even totally, on ethnic and cultural aspects as distinct from any particularly religious meaning. It is worth noting here also, that this is the case for both a religion (here Islam) conceived as **universal** as well as one (Judaism) conceived in more bounded and **national** terms.

This counter-secularist trend of the oppressed could be said to reach its apogee in the Iranian revolution of 1979. Led by a cleric, the Ayatollah Khomeini, it was the complete repudiation of the Westphalian idea that the state should assert its authority by choosing and regulating an official religion. Khomeini instituted the doctrine of the *vilayat-i-faqih*, that the supreme religious authority (himself) should be the supreme state authority, with a veto over the decisions of parliament and government. This form of theocratic control of a modern state apparatus (Juergensmeyer, 1996) was a religious revolution based on Shi'a Islam which was the mirror-opposite of the Western progressivism, which assumed that modernity meant the fading away of religion from human affairs and emancipation meant the overthrow of religious authority. While sharing some of the goal of justice and democracy of secular progressivism and revolutionary movements, the Iranian revolution ended up with a state ruled by a theocratic elite from the majority religion – what may be called **theocratic majoritarianism** – even though many of the features it took owed to contextual features such as antagonisms with the US and the war with Iraq.

From there on it has seemed to some Western observers, that there has been a 'return of God' or a 'worldwide rise of religious nationalism' (Juergensmeyer, 1996). Further examples of this have been movements since the 1990s that have sought to bring in 'Islamism through the ballot box', although usually thwarted by the military supported or acquiesced in by the West, as in Algeria and Egypt. A **religion-identity based majoritarian nationalism** (Hindutva) has become a powerful force in India, and accompanied by violence against minorities, especially Muslims, challenges India's constitutional secularism (van der Veer 2012). While these counter-trends are mostly from outside the West and often are anti-imperialist or anti-Western hegemony, there have also been counter-secular trends and movements within the West. Two notable examples are the Religious Right in the United States from the 1970s, and the significant role played by the Catholic Church in Poland, not least its role in bringing about the end of communism.

Such models are of course subject to change and contestation from within. Over time Jinnah's identity-nationalism has had to compete with an Islamism for whom identity is not enough and seeks institutionalisation of aspects of shari'a. This swing to a more ideological form of religious nationalism has, for example, led to the exclusion of the Ahmadiyya community and to a persecution of the Shia and Christians that the State is unable to stamp out (S Saeed, 2007). Israel, as a "Jewish democracy" (Cohen-Almagor, 2017) is an example of a state that may have a form of religious nationalism, in which Orthodox Judaism exerts considerable power and influence, producing complex and blurred boundaries between the religious and secular, and the erosion of basic rights for

non-Orthodox Jews and non-Jews (Cohen-Almagor, 2017; Ben-Porat, 2017). Another example is Ataturk's Turkey, which sought to **control and utilise religion**; through, for example, the Diyanet (Directorate of Religious Affairs) the state defined what constituted Turkish Islam and wrote Friday sermons to be delivered by the imams. Turkish secularism has been variously described by commentators as 'militant', 'authoritarian', 'oppressive', 'pathological', and 'assertive', although history is more ambivalent about this (Gülalp, 2017; Sevinc et al. 2017). At times, such as in the first decade of the millennium, it has been some Islamists, such as the AKP, who have been able to frame their political project in liberal terms of human rights and freedoms, although again swings are evident between a more open, and as in recent years, authoritarian and assertive tendencies, all these trends operating within the same institutional framework (Gülalp, 2017).

In looking at the relation between religion and politics outside the West we, then, need to distinguish between: i) **diversity-friendly critiques and adaptations of secularisms**, on the one hand, and ii) **anti-secularism** on the other hand; and between iii) **identity-based religious majoritarianism nationalism** and iv) a **theocratic majoritarianism**. This is in addition to the earlier distinction made between v) **authoritarian secularism** as the political control of religion and vi) **'mutual autonomy'**, which includes vii) Western European **moderate secularism** from viii) **other versions of liberal democratic secularisms**, such as the US and French, all of which are being challenged by the issue of the governance of a new, post-immigration religious diversity. This is not meant to be a comprehensive typology covering all countries and nor is it to imply that a country must fit only one category. It is to introduce some key distinctions, some of which are often overlooked, we believe are useful in understanding the complex landscape of state-religion connexions (SRCs).

Moderate Secularism

We now turn to a detailed characterisation of contemporary Western European governance of religion, which unfortunately has been badly served by political theorists (Modood, 2010). For many intellectuals, especially political theorists, secularism or Western secularism has been understood in terms of the religious-liberty secularism of the USA and/or the equality of citizenship secularism or *laïcité* of France. As a matter of fact, neither of these models approximates particularly closely to church-state relations amongst West European countries beyond France, where a variety of patterns of legal-constitutional and non-legal constitutional regulation and relations can be found. In Germany, the Catholic and Protestant Churches are constitutionally recognised corporations, for whom the state does not only collect voluntary taxes but the church welfare organisations, taken together, are the largest recipients of funding to non-state welfare providers (Lewicki, 2014). Denmark has a system of classes of recognition, producing a tiered set of rights and privileges in relation to the state (Laegaard, 2012). In Belgium, a number of religions have constitutional entitlements and a national Council of Religions enjoys the support of the monarch. Norway, Denmark and England each have an 'established' Church (even if only 'weakly' established), Sweden had one till 2001 and Finland has two. In Italy, Ireland and Poland the Catholic church is

powerful and influential, albeit distinct from state structures (for alternative typologies, see Koenig, 2009, Madeley, 2009, Stepan 2011 and Ferrari, 2012). Yet despite these connexions between state and religion, it would be difficult to dispute that these states are not amongst the leading secular states in the world – more precisely, one could only dispute that if one had some narrow, abstract model of secularism that one insisted on applying to the varieties of empirical cases. So, we need a conception of secularism that fits this European, in particular N.W. European reality, with a partial exception of France.

We term this West European governance of religion, ‘moderate secularism’ and characterise it in terms of five features, which in combination lead to its distinctiveness, including from US and French models (Modood 2017). Some scholars further differentiate what we unite, but our level of analysis at this stage works is to identify what they have in common.³ It is important to stress that these features describe the normative character of aspects of the most liberal democratic states of contemporary Europe, that is, these are not features of an archaic or illiberal privileging of religion:

1. Mutual autonomy, not mutual exclusion or one-sided control. This is not distinctive to ‘moderate secularism’, as it is central to US liberal secularism too, and to some extent France as well, which leans more towards one-sided control than the US or other Western European countries.

2. Religion is a public good, not just a private good. Organised religion can play a significant role in relation to ethical voice (Habermas 2006) general social well-being, cultural heritage, national ceremonies, and national identity. This can take various forms, such as: having input into a legislative forum, such as the House of Lords in the UK, or on moral and welfare issues; being social partners with the state in the delivery of education, health, and caring services; or more intangibly, in building social capital and the production of attitudes that create, for example, family stability, a compassionate civil society or economic hope. Of course, the public good that religion contributes is contextual; religion can, in other contexts, be socially divisive and can lead to civil and international wars. Hence religion can also be a public harm. The point is that religion’s contributions are not confined to private lives; they are socially and politically significant in many different ways, and need to be addressed by the state.

3. The national Church or churches (organisers of this public good) belongs to the people and the country, not just to its religious members and clergy. All citizens, regardless of membership, can feel that the national church should meet certain national standards not expected of religious organisations in general. For example, when the Church of England’s ruling body, the Synod, failed in 2012 to achieve the two-thirds majority necessary to permit female Bishops, many secular commentators felt that the Church of England had let the country down, while the absence of female Catholic

³ Stepan (2011), for example, distinguishes between two models within what we call moderate secularism, namely ‘The “Established Religion” Model’ and ‘The “Positive Accommodation” Model’. We do not quarrel with this helpful distinction (equally helpful are the other models that Stepan identifies). Moderate secularism encompasses the two and so characterises what they have in common.

priests or female imams is not part of a national conversation. The loud criticism by those who are not active Anglicans did play a part in the Church's reversal of its decision in 2014. The Lutheran Church in Denmark, as another example, is almost universally thought by Danes to be an element, perhaps a central element of Danish national identity, even though only a minority say they believe in its doctrines and even fewer worship in the Church (Jenkins 2011). In these and other 'moderate secular' countries, even atheists feel that they have a right to use the national Church for weddings and funerals. Relatedly, the Anglican Church's sense that it has a duty to serve the country has meant that it has in recent years often spoken up on behalf of ethnic and religious minorities. The latter have come to appreciate that its presence signifies that religious identities – including those of minorities – may be a feature of national belonging (Modood 1997).

4. It is legitimate for the state to be involved in eliciting the public good that comes from organised religion, and not just to protect the public good from dangers posed by organised religion. If recognised as public goods, then, depending on the circumstances, it may be decided that they are best achieved through some state-religion connexions (SRCs) rather than strict separation. This is a contingent matter, but the experience of Western Europe is that some connexions are better than none. Of course, as has been said, religion can also be a 'public harm', since it may serve as a basis for prejudice, discrimination, intolerance, sectarianism, social conflict, violence, and so on, so the state has a responsibility to prevent harm as well as enhance the good (Modood 2010). As with public goods, so with public harms, the interest of the state will not be primarily theological, or taking preferential sides for or against one religion regardless of consequences; the state will be motivated by fostering and maintaining tangible and intangible public – or 'secular' – goods. The key consideration for the state will not be secular 'purity'. Instead, the state shall ensure that the means and ends are consistent with, and effectively serve, secular rationales, without constraint by a fetish for 'separation' (Bhargava 2009 partly builds this fetish for separation into his definition of political secularism). In recent years, concerns about Islamist terrorism and 'radicalisation' have led states to extol and condemn certain kinds of Islam, to co-opt certain Muslim groups into governance, and to engage in matters of imam training and the schooling of Muslim children (in relation to England, see O'Toole et al. 2013). Moreover, if religious organisations are supported with public funds, or tasked by the state to carry out some educational or welfare duties, then the state will want to ensure that they do not compromise key policy goals. That is why religious organizations are increasingly subject to certain legal requirements such as equal access or non-discrimination – at least in some European states, such as Britain, more so than others such as Germany (Lewicki 2014) - and when religious organisations are publicly funded to deliver social services, citizens have options to receive the same services by non-religious organisations.

5. Moderate secularism can take different forms in different times and places, and not all forms of religious establishment should be ruled out without attending to specific cases. State-religion connexions take different forms in different West European countries depending on their histories, traditions, political cultures, and

religious composition, which all may change over time. One of the forms it may take is 'establishment'. Formal establishment is only found in a minority of countries, yet nevertheless it is one of the forms that moderate secularism takes. Even when it does so, this complex of norms and practices may be called 'moderate secularism' rather than 'moderate establishment' (as Dworkin 2006 labels Britain; see also 'modest establishment' of Laborde 2013) because it is secularism not establishment that is in charge: the place for religion and establishment is dependent on secularist institutions and decision-makers referring to secularist values and principles. It is clear that this is what exists in practice. Both in relation to the church-state relations narrowly conceived, or in terms of an expansive sociological analysis, governing power lies with secularist institutions, networks, and individuals employing secular identities, interests, and goals. Moderate secularism is not something to contrast with religion; religion is already a component of it; it is the governance of a particular way of relating religion with state power and politics. So, moderate secularism is not an abstract political theory model but is a conceptualisation of a historically evolved set of arrangements and practices, formal and informal.

It should be clear, then, moderate secularism does not promote the idea of political authority/autonomy in an anti-religious way, rather it allows organised religion and religious motives to play their part in contributing to the public good (Modood, 2010). This may be taken to be a form of privileging religion and of course it is. What must be borne in mind is that few if any states uniquely privilege religion. Whether our criteria is the expenditure of tax revenues, management by the government or symbolic status as 'national' or teaching in state schools, most states privilege various sectors of the economy, science and universities, museums, areas of natural beauty, the arts and sport and so on – all matters strictly outside the sphere of political authority (see Modood, 2016). So apart from extreme libertarians and anarchists, most people rightly have no problem with the idea of state privileging various social activities and judge each case on its merits – what has been called '**multiplex privileging**' (ibid). The term multiplex conjoins multiple and complex in order to get at the complex ways in which "the state typically engages in not merely multiple cases of privileging, but moreover [that] the privileging is not all of one basic kind" Modood, 2016: 192).

Challenges and (Re)orientations

Having presented an account of secularism as the governance of religion, culminating in a characterisation of the main West European model as moderate secularism, and pointing out its virtues, in the manner of a Weberian ideal type, we now turn to the question of how it might normatively relate to religious diversity. Before we directly engage with this, we will place our approach on a larger map of how scholars and publics have been thinking about secularism in the recent period. In the current changing social and political context three (re)orientations with regard to secularism can be discerned.

1 New Hardliners

Some (re)assert a hard/radical/muscular secularism. This has been prominent, for example, among US constitutionalists, New *laïcité*, and New Atheist movements. In Europe, these new hardliners have frequently been occupied with a refusal of the accommodation of Muslims and Islam, which “bec[a]me the necessary European Other” both internally and externally (Trinadafyllidou, 2017: 29; see also Hellyer 2009), reinforcing a rejection of multiculturalism.

2 New Accommodationists

Liberal theorists have at least in part accepted the charge of secularist domination and that such domination is not merely a political ambition but built into the very concepts of liberalism. John Rawls, the leading liberal philosopher of the last half century had in his early work expounded a purely rational conception of justice but towards the end of his life felt it necessary to revisit the concept of public reason to show that it was not ideologically secularist and accommodated religious voices in the public square (Rawls, 1997). Jurgen Habermas has engaged in similar revisionary accommodation and has described the current epoch as ‘post-secular’ (Habermas, 2006). By ‘post’ he does not mean it as in ‘post-feminism’ or ‘post-racial’, something that we have gone beyond and left behind. Rather, his ‘post’ is ambiguously suggestive of a new, reflexive phase of the secular (here the ‘post’ is as in ‘postmodern’ and as in ‘post-colonial’), which emphatically means we have not gone beyond the epoch marked by the suffix. Charles Taylor disavows the vocabulary of ‘post-secular’, preferring to describe the relevant period of revision as one of rethinking secularism as he is clear that ours is ‘a secular age’ (Taylor, 2007).

3. Multiple Secularisms

A more historical/national identity sensitive interpretation of ‘multiple secularisms’, especially regarding accommodation of new diversity has also emerged. Scholars today are increasingly locating themselves within not just a perspective that demands we rethink political secularism in the light of diversity within and across societies, but that we acknowledge that secularism is highly contextual. As has begun to be evident from the historical sketch above, secularism takes a different shape depending on the state traditions and political culture of a society as well as of which religion or religions it is contoured around – secular and religion being correlative, mutually informing concepts and mutually shaping each other in varied permutations. It is in part for this reason that path-dependent formations of state-religion relations and governance of religious diversity based on historical contingency and contextualism are an emphasised feature of the literature (Bader, 2013; Stepan, 2011; Enyedi, 2003).

This means that we are talking of ‘multiple secularisms’ both by widening our scope outside the West, but also within the West (Taylor 1998, Casanova 2009, Calhoun et al 2011, Stepan 2010). Taking this point further, we recognise that multiple secularisms are an aspect of the wider theoretical and sociological understanding that the very phenomenon of modernity has to be understood in terms of ‘multiple modernities’ (Eisenstadt 2000). This approach rejects the association of modernisation with

Westernisation, that to become modern all societies have to follow the path of the West and become like the West. Eisenstadt recognises that Western modes of modernity continue to 'enjoy historical precedence' and serve as 'a basic reference point for others', but the last half century has made plain that "Western patterns of modernity are not the only 'authentic' modernities" available for concrete societal expression (ibid). Rather, different parts of the world are modernising in their own ways and this refers not least to developments concerning religion, secularity, diversity and governance. This raises no small challenge when it comes to abstractly determining what some contexts and models may learn or adopt from other such models (Parekh, 2017), a point we will pick up later.

The approach of this paper and of GREASE falls clearly into this third category. We shall therefore take the argument forward in two ways. Firstly, we will explore suggestions that have been made by some theorists on how secularism should govern religious diversity. We shall in this regard consider six pro-diversity normative concepts. These deal with the diversity internal to a polity. Our project however is a mapping and exploration of the diversity that exists across countries, indeed eight different regions of the world. So, secondly and briefly, we will present our method for conceptually and normatively engaging with this global diversity of multiple secularisms.

Six Pro-Diversity Concepts

We now consider six pro-diversity normative concepts. We shall argue that the first three are too limited, whilst the other three are resources for thinking – sociologically and normatively – about the governance of religious diversity in Europe and the other regions included in this project (for a fuller discussion of the first four concepts, see Modood 2019). They offer a basis for dialogical or cross-contextual learning about the possibilities of the governance of religious diversity today, positively and negatively.⁴

1. Freedom of conscience and 'open secularism'

'Open secularism' (Bouchard and Taylor 2008; Maclure & Taylor, 2011) posits a model which seeks the state's neutrality in relation to religious diversity whilst recognising the significance of the spiritual dimension so central and important for many religious adherents. To recognise the spiritual dimension central to many people's lives, at the centre of this model is the protection of individuals' freedom of conscience. Four principles of secularism are balanced: 1) the moral equality of persons; 2) freedom of conscience and religion; 3) the separation of Church and State; and 4) state neutrality in respect of religious and deep-seated secular convictions. (Bouchard and Taylor, 2008: 21). The balance distinguishes between 1) and 2), which form the "essential outcomes of secularism" (ibid) and the institutional structures, 3) and 4), for achieving 1) and 2).

⁴ We must make it clear that our discussion of the various authors below is not a discussion of their mode of secularism as a whole; our interest is in picking out one concept that we think is central to that position and fruitful to discuss, given the objectives and space limitations of this paper.

This downgrading of the separation of church and state to an inessential requirement of secular principles is a movement towards the historic secularism of Western Europe, but it falls short of moderate secularism. For Taylor and McLure, SRCs are judged primarily in terms of a moral individualism, whereas in moderate secularism, they may serve the public good in material or symbolic terms, eg., contributing to a sense of national identity.

Moreover, the admirable appreciation of the profound moral character of religious individuals it is not extended to groups that sustain this moral character, thus falling short of the type of positive recognition advocated by multicultural secularism, as will be seen shortly.⁵ Furthermore, it is not clear that the desire to maintain state neutrality in relation to religious conscience can be achieved. Claims of conscience – eg., that one’s religion requires time off from work - requires the courts to adjudicate on the sincerity of a religious conviction of an individual and thus unavoidably rule on what counts as sincerity of belief based on some interpretive standards.

For these reasons we conclude that here equality is principally conceived to mean equality of individuals in order to ensure and protect the liberty of sovereign individuals within a state struggling to be neutral and so this is too limited a conception of diversity. Moral equality of persons and freedom of conscience are important constraints on the governance of religious diversity but they do not themselves constitute a model for the latter.

2. Non-Othering: Jansen

Yolande Jansen explicitly defends a multiculturalist secularism (Jansen 2014). With a focus on French *laïcité*, she shows how even in a context of republican universalism, the process of incorporating Jews led French society and the French state to demand that the Jews surrender their communal lives, an extraordinary pressure not experienced by most other French people in the nineteenth or early twentieth century – but faced by Muslims today. On her interpretation, Jansen’s solution is a multiculturalism opposing the ascriptive and stereotypical images that French society creates for groups such as Jews and Muslims, while demanding of individual Jews and Muslims that they publicly distance themselves from these imagined undesirable groups by distancing themselves from their communities. Opposition to such demands upon minorities about how they should live is the multiculturalist opposition to what Jansen calls ‘secularisation’. We endorse Jansen’s conclusion that such ‘secularisation’ is a form of coercive assimilation incompatible with multiculturalism, but this does not in itself make it compatible with multiculturalism. Anti-ascriptive and anti-assimilation are not sufficient for multiculturalism. Merely opposing othering is not institutional accommodation, yet the latter is crucial to multiculturalism – in just the same way that accommodation is a defining feature of moderate secularism.

⁵ And therefore falling short of the kind of recognition that Taylor has made famous and which he thinks is necessary to understand why many Quebecers feel they are not respected within Canadian federalism (Taylor 1994).

3. Non-Alienation and Establishment

Bhargava's interpretation of a multiculturalist sensibility has judged that moderate secularism is 'irretrievably flawed' – while it has accommodated Christians, it will not be able to accommodate Muslims (2015). For Bhargava, moderate secularism is part of the problem, not the solution, since it cannot be reformed. He claims that the Christian bias inherent to any established religion, something akin to the Anglican Church's establishment in Britain, indicates that even a reformed version will alienate British Muslims.⁶ Cecile Laborde makes a similar argument. She argues 'all citizens should be able to not to feel alienated by their political institutions in light of their deepest beliefs, and that institutions should consequently be framed with that aim in mind' (Laborde 2013: 84).

A fundamental problem with Bhargava's and Laborde's arguments here is that they do not supply any empirical evidence. If we look at the relevant data from the well-documented case of Britain, we see that the evidence does not support their argument. For example, the evidence is of a strong sense of British identification and national pride amongst Muslims in Britain. An analysis of two Citizenship Surveys has concluded, 'We find no evidence that Muslims or people of Pakistani heritage were in general less attached to Britain than were other religions or ethnic groups' (Heath and Roberts 2008).⁷ This has in fact been the finding of many surveys, with one concluding that 'overall British Muslims are more likely to be both patriotic and optimistic about Britain than are the white British community' (Wind-Cowie and Gregory 2011). In late February, 2015 95% of Muslims in a BBC survey said they felt loyal to Britain (BBC, 2015).

British Muslims do include many vociferous political groups, and they have mounted many arguments, not to mention campaigns, in relation to socio-economic deprivation, religious discrimination, incitement to religious hatred, various foreign policies, anti-terrorist policies, and so on (Modood 2010). So it is the case that Muslims in Britain do seem to feel excluded and alienated by certain aspects of British society, and indeed European society – and this is a critically important datum for multiculturalism to engage with. Yet there is no record of any criticism by a Muslim group against the Anglican Church's establishment. On the other hand, many Muslims complain that Britain is too unreligious and anti-religious, too hedonistic, too consumerist, too materialist, and so on. Muslims protest far more vigorously about secularist bans on modest female clothing, such as the headscarf (banned in French state schools since 2004) and the face veil (banned in public places in France and elsewhere in Europe), than they do about 'establishment' or Christian privileges.

⁶ Unlike, Bhargava argues, India. The subsequent and sustained success of the BJP's Hindutva politics suggests that a question mark hangs over Indian secularism no less than over any other. India has its own scale of communal domination and violence, especially against Muslims and lower castes/harijans (untouchables) which go far beyond anything encountered in the Islamophobic west.

Muslims and other religious minorities appreciate that establishment is a recognition by the state of the public and national significance of religion. That recognition holds out the prospect of extending state-religion connexions. Disestablishment, by contrast, would foreclose that prospect without conferring any benefits to religious minorities. This appreciation of establishment by religious minorities is partly the result of the fact that the Church of England takes its mission to serve the country quite seriously, including the goal of incorporating new minority faith communities into its vision for the country and for the Church's own sense of its responsibilities (Modood 1997). When Prime Minister David Cameron, during the 2011 Christmas season, said that it should be asserted that Britain is 'a Christian country' (BBC, 2011) – the first time a British Prime Minister had spoken like that in a long time – it was welcomed by Ibrahim Mogra, then the Chairman of the Mosque Committee of the MCB, and later the Assistant Secretary General (ibid.).

These matters do not argue for the mistaken view that Islamophobia is not an issue in Britain, or that Muslims do not feel alienated in Britain, but only point to the way that these concerns make very little reference to Christianity, let alone the Anglican establishment. Religious minorities such as Muslims are more likely to be alienated by the kind of secular state that Laborde argues for, one which she thinks is unavoidably more suited to non-religious citizens than religious citizens (Laborde 2008: 88), and equally alienated – indeed aggrieved - by the kind of secular state that actively seeks to reform aspects of Islam as Bhargava advocates (Bhargava 2014). Bhargava thinks that moderate secularism, which is supposedly unreformable, should be replaced by the diversity-friendly secularism that developed in India. Given that he does not discuss how the Indian state has failed to eradicate the high levels of religious violence in India, and failed to protect Muslims from massacres and systematic discrimination, this recommendation must be treated with caution (Sutton 2014; Black et al 2014:2).

In her important new book, Laborde attempts to circumvent the need for empirical evidence by contending that "what matters is not what governments intend to communicate, nor how citizens subjectively perceive it but, rather, whether governmental messages express objectively appropriate attitudes toward people" (2017: 135). She now states clearly that '[w]hat matters is not the subjective feeling of alienation but, rather, whether the social meaning of particular displays can be objectively construed as disparaging [of civic/insider status]. Objective social meaning is context-dependent but not individual-dependent; it turns on how a reasonable (and reasonably well-informed) member of a community would understand the actions of public officials who undertake to display material that has religious content' (ibid, p. 85).

Yet, what if there is not a consensus on the social meaning of establishment amongst, say, British citizens? The reference to the reasonable person being reasonably informed suggests that (s)he needs to take into account some empirical data, and presumably it would be reasonable that this should include the view of Muslims (and others). We know that at any one time there can be disagreement on for example what counts as sexual and racial harassment, and women and minorities sometimes have to educate others. Giving voice to minorities and encouraging the majority to be genuinely

dialogically open is certainly the multiculturalist position here (Parekh 2000; Modood 2017b). Returning to the Muslim case, many people think that the niqab (the face veil) and/or the hijab (the headscarf) is oppressive of women and so state action to ban them in public places is liberating and is not alienating. But this would not be a reasonable view if it did not seek evidence from Muslim women. Indeed, given that they are the object of the analysis and that state action is being called for on their behalf, it would be reasonable to give special weight to the perspective of Muslim women, rather than to the reasonable person. So, similarly in case of the Anglican establishment and British Muslims. Yet this presumes that the negative status of minority religious identity is sustained by symbolic establishment and not, for example, by racialization, cultural 'othering', or muscular forms of liberal secularism that would squeeze religion from the public sphere. Disestablishment without some institutionalised religious pluralism would mean the general public devaluing of religion and could make groups like British Muslims more alienated than the status quo. So, we should not assume that state recognition of one or some religions is the only potential source of alienation on this matter; strict state-religion separation can also make alienated or aggrieved those for whom their religious identity is especially important to them and subjectively and objectively diminish their civic standing. Which is a further reason why minority perspectives cannot be assumed to be understood by simply engaging in a 'reasonable person' exercise and without allowing the minority to speak for themselves.

Importantly, the position of the established Church remains significant as it means there is a space for religion in public life, and thus a possible resource against alienation on religious grounds (Modood, 1997; Rothschild, 1997; Singh, 1997). Indeed, the established Church has proved a valuable inter-faith ally for minority faiths in gaining a foothold in the public sphere, providing institutional access to make claims for recognition and for cooperation between the state and religious groups. That calls for disestablishment come overwhelmingly from secularists rather than from minority faith groups is telling. In fact, rather than the extant institutional arrangements that have emerged historically being an insuperable barrier to inclusion and accommodation of minority faiths, the historical precedent of the state eventually accommodating religious minorities has proved an advantage and reference point for Muslims seeking such recognition.

In relation to diversity, then, we should not assume without empirical inquiry that establishment or existing SRCs are a barrier to multi-faith equality and should be dismantled. It may be the case that what is best is not dismantling but the inclusion of minorities into existing and new SRCs. This is a very important argument that is ignored in political theory and so we have gone into the British case in some length to show how out of touch the political theorists in question are with empirical realities. As it happens, it turns out 'there is no *cross-country* empirical data demonstrating that religious minorities in states, democratic or otherwise, that support the majority religion (via various policies) grow resentful of the state or its organs' (Perez, Fox and McClure 2017: 441).

From the three pro-diversity concepts we have discussed so far, we come away with two conclusions. Firstly, that these three concepts are largely about righting a negative aspect of diversity (not interfering with conscience, overcoming ‘othering’ and alienation) and so provide an insufficient normativity for the governance of religious diversity. Secondly, however, each has some value that should be features of a normative account. We now turn to the three concepts that we believe rectify that insufficiency and so are fruitful for this project.

4. Multiculturalising Moderate Secularism

In a number of countries since the 1960s, a new way of thinking and organising minority-majority relations has emerged. Initially associated with the new social movements and identity politics of gender, race, and sexuality, in Western Europe it is identified with the institutional accommodation of post-immigration ethno-religious minorities, which we shall call ‘multiculturalism’ (Modood 2007). It marks a new conception of equality. Multiculturalism is not just anti-discrimination, the sameness of treatment, and the toleration of ‘difference’, but also a respect for difference. This respect is not simply about equal rights despite differences, but about equality as the accommodation of difference in the public space, which can be shared rather than dominated by the majority. Instead of creating a sharp distinction between the public sphere of rights and civic relations and a private sphere (of male-female relations, sexual orientation, or religious belief), the public sphere reflects various norms and the interests of all.

This genuine equality requires dropping the pretence of ‘difference blindness’, and allows marginalised minorities to also be visible and explicitly accommodated in the public sphere.⁷ This equality will sometimes require enforcing uniformity of treatment and eliminating discrimination against (for example) religious affiliation, and it may also require the recognition of distinctive disadvantages (such as measures to increase the number of women in a legislature) or special needs (such as the provision of halal meat in state schools). Finally, multiculturalism as a mode of post-immigration integration involves not just the reversal of marginalisation but also a remaking of national citizenship, so that all can enjoy a sense of belonging. In the case of France, there could be a way of being French that Jews and Muslims, as well as Catholics and secularists, can possess (Modood 2007).

This multiculturalist challenge⁸, at one time seen to go with the flow of liberalism – of human rights, racial equality, decomposition of collectivities such as the nation – is properly understood as requiring not just the reform and extension of liberal democratic institutions but a re-thinking of liberalism. In this it contrasts with liberal

⁷ Will Kymlicka rightly argues that the ‘state unavoidably promotes certain cultural identities, and thereby disadvantages others’ (Kymlicka 1995: 108), but he excludes religion and ethnoreligious groups from ‘cultural identities’ (see also, Werbner, 2012 and Wieviorka, 2012).

⁸ As distinct from the ‘multicultural’ challenge outlined above; that is, one stemming from the mere fact of diversity.

approaches in so far as it is not aiming to derive or justify a position from liberalism, although is contextually consistent with liberal-democratic-constitutionalism (Modood, 2016). This egalitarian difference-sensitive accommodation of religious identities within moderate secularism is what is meant by multiculturalising moderate secularism (or multiculturalised secularism, for short).

A multiculturalist recognition of ethnoreligious identities does not however consist of endorsing the truth of any religion(s) (Modood 2007/2013). It is identity recognition as a form of equal citizenship and inclusion but without any strong evaluation or endorsement of any identities or ways of life. In so far as there is an endorsement, it is an endorsement of co-membership, including the identities of the groups endorsed as belonging, not endorsement of beliefs or practices. For example, a President attending an iftar, the eating of a meal to break the daily fast in Ramadan, is not endorsing Islam in preference to non-Islam or raising those who fast above those who do not. She is endorsing that Islam is part of the country, not asking anyone to follow it or uncritically endorsing any and every belief or practice that someone says is Islamic. It is in this sense that multiculturalism does not simply seek freedom of conscience, non-othering, non-discrimination or a religion-neutral state: equal citizenship requires positive inclusivity through identity recognition and institutional accommodation, so that all can have a sense of belonging to the national citizenship without having to privatise ethnic or religious group identities important to them.

5. 'Respect all, Positive Cooperation, Principled Distance' Model

Our fifth and sixth pro-diversity concepts both stem from considering cases of the governance of religion from outside the West. Significantly, these models and their religious diversity have emerged out of quite different historical processes and patterns from those of Western Europe and the diversity in question is historic and not formed by recent immigration. In these countries, negotiating a model to respond to the circumstances and challenges of newly independent and religiously heterogeneous states meant quite different "innovative formulas of accommodation" (Stepan, 2011: 140) and a variety of politics-religion relations necessarily emerged.

Stepan (2011), designating models from concrete contextual cases, presents a model, which like moderately secular countries is based on 'mutual autonomy' (see p. 3 above), yet contrasts with them in important ways in that it represents a more pronounced form of religion and religious diversity occupying a more emphasised position in the public sphere. He outlines this model with reference to Indonesia, Senegal and India and outlines three features that distinguish it.

The first is *respect for minority and majority religions in the public sphere*. In Indonesia, for example, based on the doctrine of *Pancasila* the state recognises the five largest organised religions in addition to the majority religion, Islam, and positively supports and protects them and requires all citizens to identify with one of them. It, moreover, mandates more holidays for minority religions combined than for the Muslim majority

(also, on India, Mahajan 2017: 82). In Senegal, likewise, Catholic religious holidays make up a disproportionate share of the state's compulsory holidays and both Muslim and Catholic faith leaders attend state events (Stepan 2011). This form of respect contrasts with the patterns of majority privilege in this regard found in moderately secular Europe. The second feature, *positive cooperation*, denotes not just positive accommodation, but forms of policy cooperation (ibid: 131). This promotes the multivocality of religions, which in turn provides scope for religious reasons and religious arguments in public debates on the basis that where, for example, human or citizens' rights violations are supported by religious arguments from some, these can be responded to and countered effectively by religious reasons and religiously based arguments. Religions *and religious reasons* are therefore valued as a public good, as a source of that good, and as dialogical partners and shapers in policy. We are not, therefore, just talking about the governance *of* religion *by* a secular politics, or of struggles between secular and religious reasons. The third feature is that of *principled distance*, which Stepan borrows from Bhargava, and which posits both support for all religions alongside legitimate state interference to contend with both interreligious and intrareligious domination. While state action must be based on secular principles, it can offer more support to disadvantaged religions; but also legitimately interfere more with one religion than another if that religion is violating citizens' rights (Bhargava 2009).

6. Respect for Deep Diversity

Our final pro-diversity model is that described by Gurpreet Mahajan, with reference to the case of India, who also identifies an historical process with "a long history of living with religious differences and the absence of a homogeneous public sphere", which has resulted in far more familiarity with visible differences and cultural differences, both of which have been *actively* present in the public domain for centuries. This familiarity in turn has resulted in the development of a religious literacy and competence, for example in decoding symbols, so that differences do not appear immediately strange or threatening (Mahajan, 2017: 80).

Mahajan argues that a moderate form of secularism is certainly preferable to the US or French models, at least as an 'enabling condition' (Mahajan, 2017: 85), and in several ways appears close to multiculturalised secularism. Yet for Mahajan, multiculturalised secularism is not enough for accommodating and valuing religious and cultural diversity if it does not embrace the idea that the state assist (often by making necessary arrangements) for the collective observance of religious practices for all communities, including the majority. In addition to the features above of the Indian context, Mahajan highlights that it is also characterised by "a weak and incomplete *process of secularisation*" and religion enjoys a unique personal and social significance, and *the right to religious practice as well as worship* has been preserved in Article 25 of the Indian Constitution (ibid: 83/86; 2013; 2015). This has resulted in differentiated legal and policy outcomes for different religious groups and their individual members (2013: 84) and, rather than individual freedom liberating the individual *from* the group, "individuals enjoyed the liberty to live in accordance with the customs and practices of their community. In fact, the state was expected to ensure that facilities necessary for

the exercise of this liberty were provided” (Mahajan, 2007: 331). Significantly, while the state does hold competence in the area of religion, through the ‘essential practice’ test (2013: 92), and basic liberties are protected, Mahajan notes how the Supreme Court, on balance, has tended towards religious rather than individual liberty (2013; 2015). There is then a respect for deep diversity that “has structured [India’s] polity and nurtured its multicultural democracy” (2007: 330-331).

Subsequently, Mahajan argues that “while [western secular states] help to secure freedom of belief and conscience for all, their attitude towards *religious practices* is, at best, ambiguous ... they consider them to be like any other lifestyle preference or set of freely chosen beliefs, ignoring that religious observances are closely tied to a person’s sense of dignity and respect, a constitutive element of their very self, and hence [experienced as] something more than [merely] an infringement of one’s basic freedom [of ‘choice’]” (Mahajan, 2017: 76-77, emphasis added). Religion then is ‘more than identity’, its constitutional place in the public domain a very part of the “fabric of India” (2013: 83-86). This then, represents a different social ethic with regards to religion and its valuation than in Western Europe; a valuation of religion which may exceed the value placed upon political autonomy in the sentiments that govern society. It may be that this social ethic, together with the historic experience of deep diversity is what differentiates this sixth pro-diversity concept from a European-derived multiculturalised secularism.

Iterative Contextualism

All six of the above pro-diversity concepts are criteria for identifying and evaluating the governance of religious diversity and can be used for this purpose in the eight regions of GREASE investigation. Even those – such as the first three – which we argued are too limited, are still important. Other things being equal, their absence is likely to limit egalitarian democracy or multiculturalism. This is particularly the case if we consider the issue of non-alienation (the third concept above) not just in terms of avoidance of religious bias but also the grievances that radical secularism can generate amongst those whose religious identity is of particular significance to themselves. We therefore must ask ourselves whether the concepts we are identifying as resources for GREASE will ‘travel’, and if so, how? The last thing we want to do is to impose a single normative conception upon all the cases we study, not least given the emphasis on context in the three pro-diversity conceptualisations we have argued for positively (6.4, 6.5, 6.6). Yet, this clearly is a normative project and so there must be normative evaluation and normative learning. We propose, therefore, a method of cross-contextual inquiry that has been outlined in a recent paper under the name of ‘iterative contextualism’ (Modood and Thompson 2018). It is an approach that is not tied to a single national context or political tradition or culture but it gives significant weight to these contexts and cultures in its theorising in at least three important ways. Firstly, it insists that political ideas and ‘isms’, including the principles of academic political theory, get their meaning from the contexts they have been extrapolated out of or engaged with. The concept of liberty has a similar but different meaning in the USA, France and Britain. A theorist whose thinking was formed in one of these contexts would reflect that context. When they applied their concept to one of the other countries they would have an imperfect understanding of

that context or they could productively revise their concept of liberty. Doing the latter is clearly the way forward but it means that the context has changed the concept. Indeed, every engagement with a context, every time the concept of liberty is taken on an outing, it will have to undergo some change to reflect the cross-contextual variety. Thus even abstract principles such as liberty are reflective of the contexts that have been engaged with. So the search for generality is hollow unless it is about accommodating the richness of contextual differences rather than abstracting them out.

Second, theorists should take contexts seriously as the network of norms, practices and institutions that constitute a context are ones which people have come to identify with – they are not just bits of organisational machinery but are a socio-cultural ecology in which people have made and across generations developed identity investments. While this does not mean that contexts cannot be criticised, the fact of those identity investments implies a duty of care on the part of critics. Whilst there will always be a limit to how far this can be practiced, the point applies to majority and minority practices alike. The last point to mention from this article is how to understand the possibility of reform and deliberate change. Oakeshott argues that political traditions are ‘neither fixed nor finished’, have ‘no changeless centre’ and no part of them is ‘immune from change’ (Oakeshott 1962: 128). Sometimes misunderstood as a change-averse traditionalist, Oakeshott’s point is the opposite: no practice is static and there is no fixed, singular direction of change or progress. Rather, he argues, every political context, gives some indication or ‘intimation’ of what changes are possible, appropriate, necessary and so on. These are matters of judgement not of rational deductive solutions but again they point to the importance of understanding the specificity of a context: reformation means a deeper understanding of the specific case and of what is problematic within it (Modood and Thompson 2018).

The theorist on this account passes through four methodological and iterative phases, which together build towards the formulation of principles: generating principles, refining principles, revising principles, and applying principles. As in the original paper, to illustrate the method we can use the example of hate speech and equality, beginning with the question of whether legislation on hate speech should be extended to include hatred on the grounds of religious belief as well as racial hatred in the context of England Wales. In the first phase, *generating principles* (ibid: 346), the theorist will begin with the legislation concerned with hate speech and other cognate legislation in order to determine the norm or norms most relevant. In this case the norm of equality is seen as the best guide and, assessing the question of the extension of hate speech legislation, determines that on grounds of equality it should be extended to include religious hate speech in the context of England and Wales. In the second phase, *refining principles* (ibid: 347), the theorist begins by applying the principle of equality to an alternative context. Applying this to examine hate speech in France, the theorist will notice that an important aspect of the legislation in the French context is that of reputational damage (from Articles 32 and 33 of the Law of the Freedom of the Press of 1881). Consideration of this leads the theorist to conclude that hate speech legislation should be extended to protect groups defined by their sexual orientation also. This can then be applied to the original context of England and Wales. This process so far can be

repeated by looking at other contexts, following which the theorist may add further refinements and details.

This circular process, a variation of Carens's (2004) *reflective disequilibrium*, may lead not just to the refinement of a principle through additions of nuance and detail but may also lead to a *revising* of the principle. The theorist in our example will determine that the European Convention of Human Rights and the case law of the European Court of Human Rights is relevant as a regional legal regime. Here she will consider how the Court considers a balance between the right to freedom of expression and whether a case of hate speech constitutes an abuse of that right because it negates other of the Convention's fundamental values. Here, she may find that the values of tolerance, social peace and non-discrimination override freedom of speech in certain cases. In this case, a further objective of hate speech legislation is to protect these fundamental values. Revising the concept in this way may mean she also decides to drop the earlier adjustment of group defamation and thus the scope of the principle is further revised. The revised principle may then be used to make revised judgements of the plural contexts being considered.

In the fourth phase the theorist *applies* (ibid: 349) the principle in a way that gains some critical distance from a particular context in order to critically assess the contextual norms under consideration. This is made possible as through the process of generating, refining and revising the principle means that the general principle no longer simply matches any one of the contexts under consideration, it will be at variance with all of them in some way and as a result provides a critical standard of judgement for each. In applying the principle, however, the contextualist theorist is subject to three types of constraint such that the people in any one context are not obliged to bring norms in that context in line with the general principle. *Practical constraints* (ibid: 351) mean that the feasibility of different courses of action that may derive from theorising must be taken into account in a context-sensitive way; *behavioural constraints* (ibid) require that how we can reasonably expect people to behave and change the way they behave must be considered; and *normative constraints* (ibid: 352) require that the ideals and values operative in a context and valued by the people who live there are also considered. Such limits are significant in that ignoring them will affect the feasibility of implementing changes to existing normative practices, values and behaviours, and therefore the efficacy and relevance of norm generation.

This, then, provides us with a method which recognises that we have to begin with some concepts and normative principles, such as moderate secularism and the pro-diversity six concepts above and yet is context-sensitive, It provides a method of applying concepts to different contexts whilst expecting that the concepts will inevitably have to be refined and revised in the process of application. Yet, finally, that it is possible to both recognise that each governance of

Conclusion

In sum, we have argued that it is necessary to begin with a minimal definition of political secularism, namely, political autonomy vis-à-vis religion. This has distinct advantages for GREASE. It is able to encompass within its scope states which are rightly thought of as secular, but which would fall outside too thick a definition based on a lack of separation, as well as those states which are extremely restrictive of religion and religious freedoms. With this width of contextual appreciation of secularism and the governance of religious diversity in mind, we engage with the empirical variety of the eight regions of the study with the distinctions that were arrived at in the first half of the paper. These are i) **diversity-friendly critiques and adaptations of secularisms**, on the one hand, and ii) **anti-secularism** on the other hand; and between iii) **identity-based religious majoritarianism nationalism** and iv) a **theocratic majoritarianism**.

We went on to identify moderate secularism as our Western European point of departure as we cast a wide geographical net in order to inquire into the governance of religious diversity. We do so by noting that normatively we are seeking to go beyond **freedom of conscience**, **non-othering** and a focus on state-religion connexions or severances as the source of **minority alienation**. Positively, we shall use the **multiculturalising of moderate secularism**, the '**respect all, positive co-operation and the principled distance model**' and **respect for deep diversity** as our normative guides. With these bases in mind, a methodological process of **iterative contextualism** has been proposed, designed to allow sociological cross-contextually-sensitivity so that we can analytically identify normative concepts and resources for a project of dialogical or cross-contextual learning about the possibilities of the governance of religious diversity today, positively and negatively.

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