

## Comparative Report

# State-Religion Relations in Different World Regions

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This is one of two comparative reports addressing key themes of the EU-funded research project GREASE. The other comparative report concerns violent religious radicalisation dynamics in different world regions. Both reports are available on the GREASE website alongside many related publications and resources.

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# Comparative report on state-religion relations in different world regions<sup>1</sup>

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<sup>1</sup> This report is based on regional reports by Thomas Sealy and Tariq Modood (Western Europe + Australia and South and South-East Asia), Tina Magazzini and Anna Triandafyllidou (Southern and Southern-Eastern Europe), Georges Fahmi (MENA) and Egdunas Račius (Central Eastern Europe and Russia). These in turn are based on national papers where additional contributors to those already named are Mila Mancheva, Liliya Yakova, Leda Kuneva, Rosalina Todorova, Gergana Tzvetkova, Eda Gemi, Mehdi Lahlou, Mounir Zouiten, Hisham Hellyer, Haldun Gulalp, Gurpreet Mahajan, Pradana Boy Zulian, Yüksel Taşkın, Imran Rasid, Zawawi Ibrahim, Daniel Vekony, Marat Ilyasov, Michele Grossman, Vivian Gerrand and Vanessa Barolsky.

## 1. Introduction<sup>2</sup>

Debates and controversies over the governance of religious diversity are important features of the social and political landscape in all five regions and the country cases within them discussed here, and all have historical as well as contemporary forms of these debates that have had a significant impact on not just the structures and forms of governance but also on the very identity of each state as it has grappled and continues to grapple with religious diversity and the issues it raises.

This report presents the comparative analysis and findings of different modes of state-religion connections, looking at the norms, institutional arrangements, policies and practices of different countries in our five regions. Our comparative analysis develops in two directions. We analyse them comparatively with a view to identifying common and diverging patterns within and between different regions (within Europe but also between specific parts of Europe and the other regions studied). Central to state-religion relations is the idea of political secularism and so we offer a minimal definition of political secularism from which we can compare countries and regions (section 6).

We also seek to identify the factors that can explain the evolution in the different countries and current challenges posed to or by how religious diversity is governed. We are then not simply interested in a static ‘model’ view of state-religion relations, but in developing a comparative framework that allows us to analyse changes and developments in ways that might lean towards measures and arrangements that are diversity enhancing or equalising upwards, on the one hand, or towards diversity restricting or equalising downwards measures, on the other. Our approach is therefore contextual and takes into account both the sense of varying from place to place as well as varying in forms of moral reasoning (Bhargava, 2009; Modood, 2010).

This report is structured as follows: The first section provides a brief outline of how secularism arose before the second section outlines the key contemporary challenges posed to or by secularism and the governance of religious diversity. The third section then introduces the comparative framework of the GREASE project. Subsequently, this is then applied to first and intra-regional comparison before turning to an inter-regional comparison that addresses how the core ideas and concepts of political secularism (based on our minimalist definition) and freedom of religion ‘travel’ between the different regions.

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<sup>2</sup> Regional references should be read as shorthand in the context of the focus country cases for the project. Thus, Western Europe refers to the UK, Germany, France and Belgium, with the addition of Australia; Southern Europe to Italy and Spain; Southeastern Europe to Albania, Bosnia and Herzegovina, Bulgaria and Greece; Central Eastern Europe to Lithuania, Hungary and Slovakia, including Russia; South and South-East Asia to India, Malaysia and Indonesia; and MENA to Turkey, Lebanon, Egypt, Tunisia and Morocco.

## 2. Establishing religion and paths to secularism

Secularism is a contested concept. While for some it is the best, or only, way of guaranteeing important freedoms and equalities in diverse societies, for others it is an alien concept, a (Western) imposition that has limited purchase in non-Western contexts. Secularism can be ‘top down’ and statist or bottom up and emerge from social currents below, and both of these directions might push or pull at each other. Secularism, contrary to (Western) popular opinion, can even be advocated by religions themselves. It can evolve gradually or be imposed forcibly and quickly. Perhaps understandably, the latter, if history is our guide and as we will see below and again in the following section, proves to be less stable. Secularism is also contested in a further way; what it means and what it looks like in terms of state-religion relations is also at issue. One thing that can be said though is that at the heart of debates and controversies around all of these paths and debates is the issue of how religious diversity is governed. In section 6 we provide a definition of minimalist political secularism as part of our country and regional comparative analysis. This section provides brief overviews of each region and how secularism came to salience as a form of governance, whether it has endured and where it has receded.

**2.1** For modern **Western European** states, we can trace secularism’s genesis back to processes set in motion by the period of the Protestant Reformation through to the mid-17<sup>th</sup> century. Following the Thirty Years’ War (1618-1648), the Peace of Westphalia established the principle of *cuius regio, eius religio*, dividing Western Europe (WE) into nation-states that were Catholic or Protestant (of different characters), notwithstanding some switching and sharing. Despite the supposed toleration of minorities also secured as part of the treaty, this led to a process of religious and cultural homogenisation, the norms of which prevail in the public domain today. While each country has its own specific path and key events, the separation of political and religious authorities and opening up of religious diversity was, for the most part, gradual over the subsequent two centuries as religious tolerance gradually increased (in relation to dissenting minority Christian groups and later Jews) and the idea of privatised religion also gained ground in the 19<sup>th</sup> century. Into the 20<sup>th</sup> century, while a long process of political and to an extent social secularisation continued, for most of the region, state-religion connexions persisted even as they were gradually lessened and churches had less influence on political affairs. Religions, however, continue to play significant public roles in partnership with the state, especially in welfare and education. Greater religious diversity has also continued to be recognised in these relations, albeit not without controversies. France is an exception with its ideal of freedom *from* religion and a public sphere denuded of religion going back to the French Revolution, but even here state-religion connections have persisted, albeit in a much more restricted form. Nevertheless, an important characteristic is that these processes and paths to political secularism were, notwithstanding swings and intense controversy, gradual as the position of dominant churches eroded in relation to the state, the result of competing interests and perspectives within the countries, and even within the dominant churches.

Australia is something of a geographical outlier in this grouping but bears important cultural and conceptual similarities. Occupied initially as a penal colony by the British it then became

a colonial settler society. A long shadow hangs over its historical development as a Christian-majority nation, of systematic dispossession, displacement, and denial of the continent's indigenous Aboriginal and Torres Strait Islander peoples. As a result of being a British colony, the early Australian settlement period was dominated by Anglicanism through the Church of England, and Catholicism was associated with the colony's Irish Catholic convicts. As with WE, the growth of modern capitalism and the early modern scientific revolution resulted in the gradual and increasing circumscription of religion from areas of politics and social life.

**2.2.1 Southern Europe** is similarly marked by one religion coming to dominance to the exclusion of others before a separation of religious and political authorities, even as one religion maintains a privileged position today. In Spain and Italy, Catholicism had long been the dominant religion. Following Italian unification, Catholicism was recognised as the state's official religion but there was also official separation between church and state. Under Mussolini's Fascist dictatorship, many of the prerogatives of the Catholic church were restored and the Vatican City State was created. In the aftermath of the Second World War, freedom of religion and the separation of state and church were incorporated as fundamental values, and the Catholic church was removed as the state church, although it retains a strongly privileged position. In Spain, a short-lived secular constitution (1931-1939) came to an end under Franco's dictatorship (1939-1975), which re-established Catholicism as the state religion (Urrutia Asua, 2016). It was not until Franco's death in 1975, the transition to democracy and a new constitution (1978) that a gradual separation between the Catholic Church and the Spanish State was agreed upon, with Catholicism still holding a privileged position. It was only in the early 1990s that both the Italian and Spanish states reached formal agreements with representatives of minority religions. Greece's emergence as a modern nation-state, as Southeastern European states discussed below, is marked by the Ottoman empire. Gaining independence in 1821, the Orthodox Church became the dominant religion and religious homogeneity left little room for ethnic or religious minorities, particularly Muslims (Baltsiotis 2011: 18). As with Italy and Spain, a far-right dictatorship entrenched this connection and the view of Greece as a Christian Orthodox nation and the homogeneity of the Greek 'ethnos' has remained (Skoulariki 2010: 302).

**2.2.2 Southeastern Europe** nation state formation is marked by the Ottoman empire and its gradual dismemberment, states gaining independence beginning in the 19<sup>th</sup> century through to the early 20<sup>th</sup> century. This was followed by periods of religious homogeneity in the case of Bulgaria and Orthodox Christianity, political secularism in Albania, and a unique multi-religious polity in Bosnia and Herzegovina (BiH). The grip of the state over religion intensified during the Communist period in the second half of the 20<sup>th</sup> century, when religious institutions came to be viewed as ideological enemies under regimes of forced atheistic secularism. In the early 1990s the fall of Communism precipitated radical transformations and although trajectories followed by the former communist countries largely differed, each share features of a close connection between national and religious identity, and a dominant religion. Nevertheless, faced with ethno-religious divisions, they each established formal separation of state and religion whilst maintaining close ties with multiple religions being recognised.

**2.3 In Central Eastern Europe** new sovereign nation states emerged in the region in the 20<sup>th</sup> century. The region had previously been ruled by empires that privileged Catholic or Orthodox churches, alongside a historic tradition of dealing with different minority religious communities. Though the region of Central Eastern Europe (CEE) had not experienced the secularizing wave seen in Western Europe, in the interwar period, secularist ideas finally found their ways into the region's societies. Following the October Revolution in 1917, Russia, now under Bolshevik rule, opted for the extreme form of state secularism and turned to suppression of all religious communities and their organizations (Furman, 1989) (and Lithuania also came under Soviet control in 1940). The brief interwar period was followed by the communist era in the entire region, which was marked by the communist regimes' atheistic stance and the extreme form of state secularism, which had debilitating and detrimental consequences to all religious groups in the region. All religious communities in the then Socialist-Communist bloc were closely controlled by the government and only the major Christian denominations managed to continue religious life. Christian Churches adapted to the political reality and sometimes (particularly Orthodox Churches) even went into tactical collaboration with the communist regimes. In some of the countries of the region, however, the Catholic Church participated in peaceful resistance, for which they often paid with their freedom. Probably the best-known example of this is Poland but it was also the case in Lithuania, Slovakia and Hungary. Nonetheless, several decades of state secularism resulted in dramatic decline in religiosity among local populations and by the end of the communist era, the bulk of the local population had become effectively post-religious (agnostic, if not atheist). Since the collapse of the communist regimes in 1989/90, the national constitutions declared the states to be neutral towards religious organizations and opened the door to greater religious freedom along the lines of Western modes, and in some cases to a religious revival among the population. However, at the same time, the Roman Catholic Church and national Orthodox Churches have regained a privileged status and close identification with the nation-state.

**2.4 In the MENA region** Egypt, Turkey and Tunisia witnessed a process of modernization starting from the 19<sup>th</sup> century, reducing the influence of religious actors in the educational and judicial spheres and introducing parallel 'civil' systems. As countries in the region gradually gained independence from colonial and imperial rule in the 20<sup>th</sup> century the formation of modern nation states had a deep impact on the role of religious actors and their religious claims, and the role of religion in both state and society was regulated by the new modern elite. This resulted in variation within the region reflecting different power dynamics between political and religious authorities and their claims for legitimacy. Nevertheless, by the beginning of 1970s, state policies to control the religious sphere faced resistance in the form of an immense religious revival with the aim of Islamizing both the state and society, breaking the monopoly of the religious establishment over Islam as well as state control over the religious sphere (Zaman, 2002). In the period that followed, the democratic openings that appeared allowed Islamist movements, such as the Muslim Brotherhood, which had previously been excluded from the mainstream of politics, to transition from extra-political challengers to political parties part and parcel of mainstream politics. In the 2000s, with the Arab Spring, debates between secularists and Islamists over the relationship between religion and state, law and politics again resurfaced. In Egypt, Morocco and Tunisia, Islam retains dominance and is closely entwined

with the offices and workings of the state and national identity. Even in Turkey, where the Constitution explicitly describes Turkey as secular, the reality is that Sunni Islam is practically the official religion of the state, controlled by a department of the state and Turkish national identity is closely tied to Islam. Lebanon stands out as an exception in the region, given its demography as well as its historical path. An improvised form of the Ottoman *millet* system was established following the civil war (1975-1990). There is limited recognition of a secular state authority that guarantees religious and non-religious freedoms and the Lebanese political regime represents a form of power-sharing among confessional groups, an arrangement which has endured despite originally conceived as a temporary arrangement.

**2.5 South and South-East Asia's** paths to secularism are marked by European colonial rule but the region is also characterised by an historic and deep religious diversity with indigenous religions as well as Hinduism, Buddhism and Islam all having been present in the region for centuries; there is not a dominant religious tradition that covers the region in the same way that Christianity is associated with Europe or Islam with the MENA region. The impact of European colonial rule changed the power balances of the existing religions as well as structural features of the governance and place of religion in public and political life, where religious bases of law and politics gave ground to 'secular' forms of colonial governance. Upon independence in the 20<sup>th</sup> century, all three countries faced questions over political secularism as part of new constitutional settlements and as a way of managing the religious diversity of the countries. Moreover, each constitution was influenced by secular ideas and modes of governance, whether a result of pre-existing colonial forms of governance or as anti-imperial reference point as with Turkish *laïcité* (Six, 2021). The frameworks that were devised did not adhere to the available paradigm of liberal secularism and each came to their own settlements distinct from each other but also distinct from European liberal secularism, with more pronounced connections and roles between state and religion. India accepted the 'no-establishment' principle and gave equal rights (including religious liberty) to all citizens but also established a system of legal pluralism for personal laws for different religious communities. In Malaysia, Islam was made the 'religion of the federation' but although the word 'secular' is not mentioned in the Malaysian Constitution, it was affirmed by the parties involved in its drafting that the newly founded sovereign state should embrace secularism as the governing principle by assuming the separation between religion and the state. The constitutional monarch continued to be the head of Islam in his own state as are the traditional rulers of each separate federal state. Following prolonged debate between pluralists and some Muslim leaders the final version of Indonesian state philosophy expressed an inclusive formulation that granted the same positions and status to all religions under the national Constitution. Indonesia did not adopt an official religion, state power is not held by religious leaders, and laws do not find their source in religious scripture, although some laws may be inspired by the scripture of many religions allowed in Indonesia. Yet, the state philosophy of *Pancasila* includes the phrase 'unity of God', signifying the primacy of professing a religion and also guarantees that the government will protect citizens' religious preferences provided they are in compliance with the state's principles.

**2.6** In sum, we can point to three pasts that the various countries in the regions here are coming from, where formation into modern nation-states is at the heart of otherwise quite different paths to (and even out of) secularism.

1) One path comes out of a Christian majority past, which has resulted in separation between church and state (of different characters). Here Christianity, in a dominant form, formed both the main religious tradition followed by the population, notwithstanding religious minorities and diversity, and was also closely entwined with government and state apparatus. This is particularly reflected in Western and Southern Europe.

2) A second is from a colonial past on top of a Hindu or Muslim majority past, again diversity notwithstanding, which came to be marked by the imposition of Western European colonial rule and subsequent independence, where religion has assumed a central role in society and politics. This is particularly reflected in South and South East Asia and the MENA region. (Western European countries of course have colonial pasts, but as colonisers rather than colonised, this is rather different.)

3) A third path comes through a communist past on top of a Christian/Muslim/multi-confessional Austro-Hungarian/Ottoman/Russian imperial past, where secularism was initially forced and staunchly atheistic before its fall led to new negotiations over the place of religion in public and political life. This is particularly reflected in Central and Eastern Europe.

These pasts all mark the present forms of secularism and freedom of religion and their challenges in important ways as they combine with more recent trends.

### **3. Contemporary challenges**

The different paths sketched in the previous section have all set the contexts for diverse contemporary challenges to the governance of religious diversity across the regions. This section now outlines the main contemporary challenges to and for the governance of religious diversity in each region.

**3.1** In **Western Europe**, secular arrangements of politics and society seemed settled and assured as the second half of the 20<sup>th</sup> century moved on. Yet, since the late 1980s, debates about the proper place and role of religion have resurfaced and have come to be marked by two characteristics: fears of threat to the liberal secular order and security concerns associated with radicalisation. So-called New Religious Movements (NRMs) were extremely controversial (going back to the 60s), perhaps especially in France and Germany, where they have been seen as a political threat and actively suppressed (Beckford, 2004; Duvert, 2004; Luca, 2004; Seiwert, 2004). There have also been high-profile legal cases involving Christians, particularly related to sexuality, and Christian symbols in public buildings. The issue of public religion in Western Europe has, nevertheless, largely been a result of extra-Christian religious diversity that developed in the region following the end of the Second World War and related to migrants from former colonies along with Turkey. The newly established religious minorities in Western Europe and Australia have sparked fresh debates and controversies about the public and political place of religion, state-religion connections, and state responses to public religion.



Accommodations and exemptions have been claimed and made for certain aspects of dress, funeral practices, religious buildings, ritual slaughter and educational provision, for instance. There have also been informal workarounds where formal modes of accommodation have proven difficult. Yet these have been controversial and subject to political variation and change. Existing state-religion connections have at times proven unwieldy when applied to non-Christian religious traditions, particularly with regard to issues of hierarchical institutionalisation and representation. This, moreover, has especially been the case for the region's Muslims and Islam. Western European countries have struggled to institutionalise Islam in particular through national representative bodies seen as legitimate by both the state and the communities they are supposed to represent. Questions over the ability of Islam to be accommodated in Western European countries have been a particular issue for the far-right, which has often come to define itself in opposition to Islam and Muslims, but some liberals and those on the left, far more comfortable with anti-racism than religion, have also expressed scepticism about certain practices and values seen to be out of step with Western liberal society, especially around issues of gender equality and sexuality. While at times these debates have had an effect wider than Muslims, the issues that have provoked them and the main focus of them has more often than not been related to Muslims and Islam, something that has been intensified in a context now heavily marked by security apparatus and fears over radicalisation, which have also put Muslims under the microscope and had a significant impact on measures of governance that have placed Muslims under extra scrutiny and conditions for recognition. The current situation in the region then reflects a certain agonism over the place of public religion and its relation to liberal secular order in general, and the more visible and audible the claims, the more this is the case. This is intensified with regard to minority religions that do not so easily fade into the background as 'part of the scene', and Muslims in particular have stretched the existing arrangements and forced, in some instances, renewed thinking and attention to how accommodation and inclusion might be achieved, or in other instances, a contraction in pro-diversity arrangements and policies.

**3.2** In all six **Southern European** countries considered here, disentangling national identity from religion remains a work in progress despite moves to open up to diversity in recent decades and contemporary challenges revolve around the inclusion of long-standing religious minorities as well as more recent diversity. BiH is probably the most acute case as ethnic and religious identities are fused; the divisions created during the war remain and the religious institutions revived after the fall of communism continue to be involved, often controversially, in political and public life. In Albania, the loose control on religious institutions from the state enabled Muslim countries in the Middle East to establish a presence in Albania through Islamic organizations, which have since become associated with terrorist cells in the country. The state maintains a tight collaboration with major religious denominations and the Albanian Muslim Community (AMC) plays an important role in supporting state supervision. Differential treatment by the state towards religious communities remains a significant challenge. In Bulgaria, although denominations have equal rights and equal standing, the constitution declares the majority Orthodox denomination 'traditional', which puts it in a favourable position with regard to the other denominations, who must register to be allowed to operate. In recent years, we can find similarities between Bulgaria and Greece in the way in which religion

has remained an important marker of identity and state-religion relations have been fraught with tensions over further separating church and state and accommodating native religious minorities as well as recent migrant populations; while the legal protections might be comprehensive, their practical application is still not always effective.

While long-standing minority populations have been one source of challenge when it comes to contemporary religious diversity governance and the relationship between religious and national identity in the region, challenges have surfaced in relation to more recent migrant populations. For Spain and Italy, controversy arose as formal agreements were reached with representatives of minority religions from the early 1990s. The number of religious minorities recognized by the Italian State continued to widen in the 2000s but left out religions perceived to be at odds with Italian law, namely Islam (which represents the largest religious minority in the country) and Sikhism. A further dimension, one which Italy in particular shares with Greece and some Southeastern states has been the rise of far-right political groups on anti-diversity and anti-immigrant platforms, exacerbated by the economic crisis in 2010. Spain here diverges from the other two southern countries: a similar economic crisis and immigration concerns have not led to such a rise of far right-wing forces or of anti-immigrant rhetoric. The contemporary Spanish legal system provides a relatively strong guarantee of freedom of religion; however, the main limitations and unsatisfied demands of religious minorities have to do with the discrepancy between legal and practical dimensions (Ruiz Vieytez, 2012).

**3.3 Throughout Central Eastern Europe**, the first decade after the collapse of communist rule witnessed very liberal regimes of governance of religion, something that led to a proliferation of groups claiming to be and registered as faith communities. Yet, there are questions of equality between groups, the so-called ‘traditional’ religious communities and their representative organizations would be treated preferentially by the state (in the form of financial assistance and wide-ranging social rights). At the juncture of the millennia, countries of CCE and Russia hosted a great variety of religious groups who managed to institutionalize themselves in otherwise highly secularized societies. As elsewhere on the continent, in some countries in the region there was concern about the appearance and establishment of (‘dangerous’) religious cults and sects. Furthermore, alarmed by what seemed an uncontrolled mushrooming of organizations claiming religious status, the governments in the region gradually introduced tougher regulations on registration and operation of religious organizations and increasingly reoriented their religious policies to ensure the state’s control over religion. Lately, some of the countries in the region appear to be turning away from the liberal secularism cherished in the immediate aftermath of the fall of the Iron Curtain - ties with dominant churches are tightening and minority religions are facing greater barriers to inclusion. These kinds of measures have, as elsewhere on the continent, been related to anti-diversity and anti-immigrant platforms and the rise of the far right in politics in response to the so-called 2015-2016 refugee crisis – which has been another point that has turned on Muslims and Islam. In Russia, unlike elsewhere in the region, the extension of state control was very much tied to its objectives to prevent religious radicalization of its Muslim citizens, something it had increasingly been confronted with since the end of the 20<sup>th</sup> century, and the government has to keep in mind the quite significant number of its Muslim population which it should not

antagonize. One can observe, however, a clear turn in the political elite of CCE and Russia toward populist religious nationalism, when not only fringe marginal political parties but also mainstream parties have started resorting to a rhetoric full of religious symbolism and the sense of a clash of civilizations understood almost exclusively in religious terms. As a corollary to this, political rhetoric of the region's top politicians increasingly contains if not manifest then certainly latent anti-Muslim sentiment, something that became a new norm in the mid 2010s. Across the region, SRCs appear to be increasing toward Christian faith communities and decreasing toward non-Christian and NRM type faith communities.

**3.4** The Arab Spring in some **MENA** countries has given way to challenges about the idea of religion's separation from politics and the reflection of the dominant religion in areas such as law has raised issues of minority religions and the religious identities of the states. These concerns have been exacerbated by violent radicalisation which has become a significant challenge across the region. In Egypt, debates over the religious or secular character of the state have been fraught. Terrorist violence against minorities as well as sectarian violence continue to pose a challenge for the state, which has cracked down on civil society organizations and brought about a general securitization when it comes to religious diversity that is heavily restrictive of criticism of the government. In Tunisia, secular and religious actors have made compromises but gaps have emerged and challenges around the level of control the state has/should exert over the religious sphere have resulted in radicalisation and violence finding a home. In Morocco, the youth protests that took place in Morocco in 2011 over the King's power in both religious and political spheres led the King to take several reformist steps to prevent the Arab Spring from reaching his kingdom. Radical Islamist currents emanating from socio-economic and political developments, including those related to external wars involving Muslims, have seen attacks in Morocco as well as in Europe by Moroccans and remain the key concern in the governance of the religious sphere. Turkey as elsewhere in the region has also been challenged by debates between secularists and political Islamists, its institutional structure inherited from the Ottoman Empire allowing Islamist political forces and movements to gain considerable advantage (Gülalp, 2021). In Lebanon there is an ongoing and intense political and intellectual debate on whether the confessional system is a working solution or source of enduring political, cultural, and economic problems (Taşkın, 2020: 207). Since October 17, 2019 Lebanon has been witnessing unprecedented popular protests calling for the abolishment of the sectarian power-sharing regime, protests which bring together people from different sects, regional backgrounds, ages, and social classes. This has raised fears for a falling Christian population that if it is replaced by a system other than secular, they would face severe disadvantages in relation to a growing Muslim majority (Taşkın, 2021). A further dimension to this has been the vast number of Sunni Muslim refugees that have arrived in Lebanon as a result of the war in Syria.

In sum, political figures in the MENA region have understood secularism not as separation between religion and the state, but rather as placing religion under the strict control of state institutions. The project was originally framed as not an attempt to suppress Islam, but to rather build what they considered an enlightened version of Islam. In the four cases, the political authority has tried to ensure its full control over the official religious institutions. However, the

religious revival that started in the 1970s broke state control over the religious sphere and the ruling elite had to renegotiate its rules to give access to religious actors in both political and civil spheres of society. These political parties have ended up being in power, totally, or partially, in the four countries.

**3.5 In South and South-East Asia**, despite pluralistic settlements in recognition of deep diversity, since independence, these settlements, which aimed to secure rights for the multiple religious groups in each territory, have been tested and trends in all three countries show a rise in forms of more exclusive majoritarian nationalisms that are tied to the dominant religious group, with serious implications for minority faiths as well as of ideas of freedom of religion and the place and role of religion in society and politics. In India, in the 1980s and 90s there was considerable criticism of the state's intervention in the affairs of the majority while similar interventions did not take place in the life of minority communities. Whereas several minorities have and have had pressing concerns, notably Sikhs during the 1980s, issues around India's Muslim population have come to dominate the challenges of religious diversity. In the 1990s voter support for the (now ruling) Bhartiya Janata party (BJP) rose and has since been consolidated. Since the 1990s we see greater assertion from the majority community and a push for greater space for the Hindu culture, which is also identified as the Indian culture, in the public domain. The BJP has usurped aspects of the liberal agenda to demand the formulation of a Uniform Civil Code and eliminate community-based personal laws. The majoritarian discourse by the ruling BJP and its supporters has resulted in latent and actual violence against Muslims, sometimes on a very large scale and often involving the police, who believe they are being encouraged by some politicians and given cover by their superior officers and even parts of the judiciary. This then represents a major political and state challenge to deep diversity. This has been intensified by subsequent wars with Pakistan, political turmoil in Kashmir valley, and recurrent terror attacks, making national security concerns paramount. In some ways this is perhaps the latest manifestation of recurrent problems of inter-group conflict and competition in the country, but a key difference is that the current government is in this instance on the side of the oppressors rather than trying to mediate tensions. Since the formation of Indonesia as an independent country, toleration has been a major issue. While during the New Order period (1966-1998) there was a marked tendency to limit the participation and expressions of Islam in the public sphere, since the last quarter of the New Order regime, strong manifestations of religious revivalism have been evident and Islamic groups gained momentum to express bolder Islamic symbols and concepts in politics and pressed the government to Islamize the country, marking a new development in terms of intra-religious as well as interreligious relationships. The most striking development has been the emergence of politically radical and fundamentalist Islamic movements. The majoritarian turn has created issues of discriminatory treatment of minority groups in Indonesia, including non-mainstream Muslim groups, such as for the Ahmadiyah, who have faced violence and legal restrictions in some regions. This is putting what has been referred to as Indonesia's 'covenantal pluralism' under strain (Hefner, 2020). In Malaysia also, prominent political parties have increasingly competed in an 'Islamisation race' – ratcheting up religiosity and piety as pillars of their politics – alongside a growing trend of 'sharia-isation' in order to maintain political legitimacy and vie for Malay electoral support, raising serious questions about religious freedom for both Muslims (if not

part of the mainstream) and non-Muslims alike. Much state-sponsored Islamisation has been conducted in an increasingly intolerant, authoritarian, and chauvinist manner to the extent that it directly challenges the existing constitutional rights and freedoms (that is, freedom of religion, expression, and association) that are granted to citizens.

**3.6** The challenges across the regions are diverse and contextually dependent on domestic and wider events steeped in historical relations. Behind these are considerable differences nevertheless, there are a number of shared themes. Old and new populations continue to be an issue of discrepancy, leading to debates and controversies about privilege, equality and inclusions. For younger nation-states, moreover, fault lines between the older religions themselves are pronounced. Here in particular, issues of nation, state and identity loom large and give way to difficulties in inclusion, even when there is the will to do so, and sharp exclusions through forms of majoritarianism (and majoritarian backlash) and even violence when there is not; and these exclusionary forces might be state-backed and/or from sub-state groups. Radicalisation and securitization are also widespread issues, albeit in forms quite divergent. In this final point there is an overlap with 5.2, where radicalisation as it is associated with religion is the focus. This is also an important feature in what follows in subsequent sections of the present paper, although the analytical of this report and the 5.2 report are different.

## 4. Developing a conceptual framework

If the above presents an initial overview, in developing a framework to comparatively analyse the aspects and trends we have begun to discuss above, we identify six ‘modes’ of the governance of religious diversity (see also WP1.1 concept paper for scholarly literature overview and background). While these modes identify and delineate distinct general approaches to the governance of religious diversity, approximating ideal types these modes are insufficient for comparatively analysing the overlaps and distinctions between and within regions as well as capturing trends, developments and changes or gaps and shifts between formal arrangements and practices. As such, each mode is broken down into constituent norms that distinguish them. In this way, while a dominant mode could be identified for different cases, it also allows us the flexibility to capture the dynamic character of how religious diversity is governed and how responses to present challenges are being shaped. The six modes and their associated disaggregated norms are presented in Table 1 below.

**Table 1. Modes and Norms for the Governance of Religious Diversity**

1. Majoritarian Nationalism	<ul style="list-style-type: none"> <li>• Strong state identification with one religion; but not usually theocratic</li> <li>• May or may not include toleration for other religions</li> <li>• May or may not include personal laws</li> <li>• In radical cases the state takes over or controls the institutions and followers of one or more religions (e.g. Diyanet)</li> <li>• The state may come to be controlled by religious parties (e.g. AKP, Muslim Brotherhood)</li> </ul>
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2. Secularist Statism	<ul style="list-style-type: none"> <li>• State control of religion</li> <li>• The state excludes religion from the political and the civic, confining religious freedom largely to the private sphere</li> <li>• May include some support of some religions, but religion mainly seen as belonging to the private sphere</li> </ul>
3. Freedom of Religion	<ul style="list-style-type: none"> <li>• Moral individualism – freedom of conscience</li> <li>• Religions may enjoy equal or unequal status but all are officially and socially tolerated</li> </ul>
4. Liberal Neutralism	<ul style="list-style-type: none"> <li>• Anti-assimilation and equal civic standing</li> <li>• Active ‘de-othering’ but no ‘recognition’</li> </ul>
5. Moderate Secularism	<ul style="list-style-type: none"> <li>• Moral individualism – freedom of conscience</li> <li>• Religions may enjoy equal or unequal status but all are officially and socially tolerated</li> <li>• Religion seen as a public good in need of support (funding state schools)</li> <li>• Religion might also be seen as in need of regulation (to match some prevailing values eg, issues of women bishops/single sex marriage) eg social attitudes that undermine tolerance and respect for religion and religious diversity (in interfaith and with sec.)</li> <li>• Mutual autonomy but restricted neutrality, including ‘weak’ establishment and unequal recognition</li> <li>• Generally accessible/dialogical reasons</li> </ul>
6. Pluralistic (‘unity in diversity’) Nationalism (can become a form of communalism where the national citizenship framework is weak or allows one community to dominate the others)	<ul style="list-style-type: none"> <li>• Multiculturalising moderate secularism</li> <li>• Difference-sensitive identity recognition</li> <li>• Institutional accommodation of religious diversity</li> <li>• ‘Respect all, Positive Cooperation, Principled Distance’</li> <li>• Active and present in public and political life</li> <li>• Policy cooperation - religious reasons in political sphere</li> <li>• accommodative of differentiated legal status, religious personal laws</li> <li>• primacy of group autonomy and social support for deep diversity</li> </ul>

### Notes on modes

We can make a few important observations about liberty and equality from these modes that will bear on the procedure for WP5 (below).

- Modes 1 and 2 can be characterised as anti-diversity approaches (or at least not pro- in any public sense)
- It is worth noting that our mode of secularist statism might only capture one country (from the case studies here), France (see below), but more countries would have been characterised by it until the past few decades, particularly several in Central and Eastern Europe, and we cannot discount the possibility of its future (re)occurrence and so our

framework must be able to capture this particular form. Also, norms within this mode can be seen as QONs in relation to some other countries.

- Modes 3 and 4 are not anti- or pro- diversity and might take emphasis either way, often depending on how they are modified by 1, 2 or 5. They emphasise moral individualism.
- Modes 5 and 6 are can be characterised as pro-diversity approaches, although exactly how this diversity looks and how it might also be limited is modified by present or absent features from the other models. Both give some emphasis to group liberty and differentiated group equality, with neutrality much weaker, although 6 goes considerably further and may include moral groupism.
- Modes 3, 4 and 5 all give primacy to individual liberty and equality, although 4 goes furthest in extending this to groups.
- Modes 3, 4 and 5 are all founded on political liberalism and a conception of public neutrality (even if restricted in some way). (5 was originally contextually elaborated in reference to N.W. Europe, especially the UK but has been found to apply to a number of countries and in a number of way goes beyond liberalism.)
- While mode 6 is framed in positive terms when it comes to diversity, there can be a dark side to deep diversity, as noted in section 3.5, where inter-group competition and conflict can be a recurrent feature of plural relations.

In applying these norms to an analysis of the governance of religious diversity we start with the method of ‘iterative contextualism’ (Modood and Thompson, 2018), namely by beginning with a concept or characterization that captures one country and seeing to what extent the concept has to be broadened and complexified or synthesized with another concept in order to capture another country and then another country and so on till we have a limited number of interlinked concepts that account for most country cases.

In this vein we make a further important distinction. Firstly, we designate the constituent norms of each mode as *operative norms*. Following what Parekh calls ‘operative public values’, this means that they are the norms that provide the “context and point of orientation” (2006: 267) for discussions and debate over public religion. Our further distinction here, however, is to identify and distinguish between what we call *dominant operative norms* (DONs) and *qualifying operative norms* (QONs) in each given context. DONs are those norms which we can see as operating at a more basic and underpinning level, they provide the ‘centre of gravity’ for the discussions and debates in a particular context. Often these are found in basic constitutional articles, but this is not necessarily or rigidly definitional of DONs. QONs are equally important and serve to limit, adjust, or modify how DONs function and are implemented in a way that is significant for a state’s approach to diversity. Making this distinction provides two distinct analytical advantages. Firstly, it allows us to identify and specify intra-regional similarity and difference when countries may reflect the same general mode. For example, while WE states share a basic conception of freedom of religion, there are important differences that cannot be explained without seeing how other norms interact with FoR (explained in more detail below). In this way, it allows us to assess how the norms travel in a way which is contextually sensitive, and is, therefore, a particularly apt analytical strategy

for the method of ‘iterative contextualism’. Second, it allows us to see how different countries, despite being predominantly captured by one of our six modes, also includes norms from other modes that have a significant bearing on the governance of religious diversity in that country. This provides an analytical strategy to identify, for example, how a country that reflects a mode of ‘moderate secularism’ might also have important operative norms from other modes, and which might be diversity enhancing norms (such as institutional accommodation) or diversity restricting norms (such as state control of religion). This, furthermore, allows us to look at how shifts and changes take place in one of these two directions as one or more norms become more pronounced and salient in contrast to others, again in ways that may not affect the overall mode that a country could be seen to reflect.

It is important to note that in adopting this analytical approach we are not saying that there is a causal connection between our modes and the shifts and changes that we observe. We are not suggesting, for example, that pluralistic nationalism necessarily leads to majoritarian nationalism. Our concepts are then non-causal but provide us with tools to describe and explain and alert us to patterns and shifts. Things can move in different directions, and we are able to capture this through tracing convergences and divergences. The ‘moving parts’ of our framework also lends itself to thick description of cases whilst avoiding the trap of path dependency.

The rest of this report applies this table of modes and norms to our five regions and their country case studies. The first presents an intra-regional comparative analysis that focuses on the modes and norms that characterise and operate in and between countries within each region. The subsequent section (section 6), then expands this by bringing in an inter-regional comparative analysis that discusses in particular how the key terms of political secularism and freedom of religion<sup>3</sup> travel between our regions.

## 5. Convergence and divergence: Intra-regional<sup>4</sup>

This section sets out intra-regional comparative analyses for each of our five regions, applying the modes and norms from Table 1 and distinguishing between *dominant operative norms* (DONs) and *qualifying operative norms* (QONs). It does this at two levels. It first suggests the contrasting DONs/QONs between countries within a region, before also suggesting DONs/QONs at a regional level. This distinction between levels allows us to begin to suggest how certain fundamental ideas and norms, such as freedom of religion, ‘travel’ based on how they interact with other norms.

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<sup>3</sup> Note that here this refers not to the mode of Freedom of Religion (3 from Table 1) but the legal norm that includes freedom of conscience and freedom of worship/practice.

<sup>4</sup> The regional sub-sections here are edited down versions of the Regional papers produced by their respective authors, see *fn1* above.



## 5.1 Western Europe and Australia

The Western European and Australian (WEA) dominant norm (DON) rests on a foundation of **freedom of religion based in freedom of conscience and moral individualism** (3).<sup>5</sup> These underlying principles are found and guaranteed in constitutional articles and equalities legislation in all the countries considered here. From this common basis, however, we find quite different forms and measures of governance and state-religion connections (SRCs), and which bear on how freedom of religion itself is conceptualised.

When it comes to strong state-religion connections (SRCs), the UK is the only case with a formally established church<sup>6</sup>, and despite certain retained privileges, such as reserved seats for bishops in the upper chamber of parliament, The Church of England is best conceived as **weakly established** (5). Constitutional connections are guaranteed in both Belgium and Germany. In all three countries mutual autonomy characterises church-state relations very much along the lines of **moderate secularism** (5); **state control** (2) of religion is limited and provisions such as ‘religious clauses’ allow, for example, exemption from some anti-discrimination measures in certain and restricted instances.

The norms in these states then go beyond a privatised view of religion in society as merely a matter of individual conscience. **Religion is seen as a public good and supported** (5) and freedom of worship and practice is also guaranteed by legislation and foundational constitutional articles. SRCs and religion as a public good are perhaps most evident in the role religions play in education and welfare services and provision. For example, as a result of church taxes collected by the government on the churches’ behalf, the public money that the German state distributes to semi-public organisations to provide welfare on its behalf, the churches, taken together, are the largest recipients of public money and providers of welfare services. And in the UK, faith-based organisations have played an increasing role in welfare provision to such an extent that without faith-groups’ work in welfare “the architecture of state welfare would collapse” (Dinham 2015: 109). Religions also play a central role in education, where they operate in the public school system with government funding as well as run private schools. Again, these roles are found in legislation and might take the form of involvement in setting or providing the curriculum for religious education, worship, or running what are loosely referred to as faith schools. Pastoral work in public services such as chaplains in the army, prisons and hospitals is also recognised and supported in all these countries. Dominant churches also play **a prominent role in the public life of the nation** (5). The established Church of England and the Catholic Church in Belgium are often still relied upon at times of national celebration or crisis.

As well as the historically dominant churches and religious traditions, when it comes to newer religious minorities more specifically, routes to formal recognition have also been available

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<sup>5</sup> Speaking normatively rather than in terms of historical origins.

<sup>6</sup> Denmark is another case in North-Western Europe with an established church and other Nordic countries also maintain close ‘national church’ ties, although these fall outside our country case studies.

under their general terms. Furthermore, other institutional and informal channels, which facilitate close ties and consultation between religious organisations and the government, have also been utilised and each country is further characterised by a certain **ad hoc pragmatism** which facilitates positive accommodation. Through these kinds of norms and connections between state and religion, we can see some features of **pluralistic nationalism** (6); namely, **difference sensitive recognition**, **institutional accommodation**, and areas of **policy cooperation**. Yet, **moderate secularism** (4) differs from this model in the depth and extent of these features (see also section 6).

In practice, however, newer religious minorities have often struggled to fully enjoy statuses of recognition, and where they do, they might be incomplete; in part a result of conditions for formal recognition, such as numbers and permanence, as well as perceptions of ‘otherness’ and security fears. This has particularly affected Muslim minorities - only two Muslim organisations having been granted public corporation status in Germany, and in Belgium, despite Islam being recognised in 1974 the benefits of this status were not accrued until the early 2000s. Anti-diversity moves have also taken place in ad hoc ways with bans on certain signs and symbols having often appeared in this way and even varied between regions within states. Thus, while some of the norms of **pluralistic nationalism** might appear evident, they are politically contingent and subject to change and movement within certain secular understandings and parameters. This stands out particularly in relation to the cases of NRMs and Muslims and Islam, and helps understand some changes that have occurred in the last couple of decades. In a social and political context marked by fears of religious radicalization and terrorism, there have been **government interventions** that have made the recognition of Islam more difficult or that have sought to institutionalise it in a particular way with greater scrutiny of Muslim organisations than other religions in general. States have also sought to play a role in establishing national forms of Islam alongside curtailing influence of majority Muslim countries (through mosques and Muslim organisations, for instance), moves that have been controversial; for example, in a recent move the Belgian government has terminated Saudi Arabia’s lease on the Grand Mosque of Brussels over concerns it is promoting radicalism. A further area of governance that is centrally significant here then is the *securitization* of religion, or Islam more specifically<sup>7</sup>, which has seen the governance of Muslim organisations become enmeshed with security and counter-terrorism strategies.

France forms somewhat of an exception from the moderate secularism of the rest of Western Europe and more closely reflects a model of **secularist statism** (2). France emphasises social cohesion founded in a publicly assimilationist civic nationhood, where recognising group difference is seen as antithetical to citizenship and as promoting *communautarisme*. The emphasis here tips towards freedom *from* rather than *of* religion, with the state’s role one of protecting citizens in this regard. This is based on a form of republican egalitarian individualism which the granting of group rights is seen to undermine, and religious difference is therefore **restricted to the private sphere** (2).

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<sup>7</sup> A securitized approach has also characterised the way NRMs have been targeted at certain times, especially during the 1980s-1990s.

This does not preclude some connections and support and there is a degree to which religion's role as a **public good supported through institutional connections with the state** is part of the French approach through representative bodies, regional exceptions (such as Alsace-Moselle), and some state funded private (principally Catholic) faith schools. Nevertheless, these connections involve higher levels of state interference and control and public religion is restricted and more tightly **regulated by the state**. Thus, the character of these connections is qualitatively different. Religion in public is further restricted through bans on conspicuous signs and symbols in public schools and on face-coverings in public places and spaces, both of which were provoked by the desire to regulate Muslim dress but had a general effect. France shares the nationalising and securitization features with other countries in the region but in recent moves has taken this further, shutting down a number of Muslim organisations and forcing others to sign a charter on republican values. In contrast to earlier measures which, although provoked by the desire to regulate Muslims, applied in general and also affected people of other faiths, these more recent measures specifically and explicitly target Muslims.

France's status as an exception from the Western European norm of moderate secularism highlights both the **common basis in freedom of religion and moral individualism** (3) but also how this can be understood differently and how other features of the governance of religious diversity serve to qualify that understanding and what it can mean in political and policy terms for the relationship between state and religion. It also highlights the limits of these forms of recognition and how, as well as a public good, religion, or certain forms of religion, are also seen and treated as a **public danger** and restrictions, conditions and extra regulations are placed upon religious organisations. While this is a feature of France's approach in a more general sense, and thereby constitutes its DONs, the kinds of norms and policies that this emphasis gives rise to can also be seen reflected as QONs in aspects of the governance approach in countries more characterised by moderate secularism.

Australia, while a geographical anomaly in this grouping, reflects in its approach to governing religious diversity an historically dominant Anglo-Christian public sphere arising from its past as a British colony and offers a comparison which helps anchor some of the points above further. The way in which the Australian Constitution treats religious freedom has for many decades operated on the principle that religious beliefs and practices are **voluntary and private matters**, which is another way of reflecting the fundamental norms of **freedom of religion grounded in moral individualism**. Yet, the Australian state also has long-standing connections with religion(s), pre-dating state multiculturalism which became official policy in the 1970s, such that "Australia does not have divorce from religion so much as polygamy" (Levey, 2017: 244), and is thus qualified by some features of moderate secularism in ways stronger than found in France, but weaker than elsewhere in WE. SRCs are a current topic of debate in Australia as a result of the 2018 Religious Freedoms Review. In its response to the Review the Australian government has stated that 'freedom of religion is not subordinate or secondary to the other rights which it will necessarily be balanced with' and while accepting the need to strengthen legislation against religious discrimination, the ability of religions to discriminate in ways similar to the 'religious clauses' found in UK equalities legislation is far

more contentious. Although connections and provisions are not part of the constitution, which strives for ‘neutrality’, registered religious institutions may be eligible for a range of tax benefits and concessions. In its federated system, the Commonwealth’s stance on non-interference in religious freedom has left States and Territories free to legislate on various religious matters and the status of religions is unevenly distributed as a result.

In sum, Western Europe’s regional foundations can properly be said to be **freedom of conscience based in moral individualism and toleration**, forming its DONs. However, the region is also characterised by QONs of **state-religion institutional connections**. Whether or not, however, this results in **recognition of religion as a public good** or as a **public danger** remain politically contingent and often applied in unsystematic ways. On account of this, religion can be positively encouraged and may lead to further pro-diversity qualifying norms and policies such as **difference sensitive recognition** and **institutional accommodations**. Yet, religion and its connections to state and recognition might also be an aspect of its management by the state. This can be seen in France’s general approach with its secularist statist rendering of *laïcité*, where state control and privatisation are significant DONs. It is also particularly evident in relation to Muslims throughout the region through aspects such as security measures, restrictions on public visibility, or institutional conditions, although these are better seen as QONs from DONs of moderate secularism. A question that therefore lingers over the issue of the governance of religious diversity in the region, and relevant for Australia also, is whether and when, and in relation to whom, it will come to also reflect aspects of **pluralistic nationalism** or instead might lean more heavily on **liberal neutralism** or even **secularist statism**. While the first of these is unlikely in its fullest sense given the region’s DON, and the last seems more unlikely outside of France, the second also presents significant implications for the region’s religious minorities.

## 5.2 Southern and South-Eastern Europe

Overall, as with WEA above, the Southern and South-Eastern European (SEE) models of governance of religion analysed here are all rooted in the concept of **freedom of religion based in freedom of conscience and moral individualism**, constitutionally guaranteed in each country, and characterized by the toleration of different religions (3).

In some cases this can be seen to largely translate into modes of **moderate secularism**, in which religion is seen as in need of some form of support and regulation (4) but also guarantees **mutual autonomy**. In Spain, for example, according to the Religious Liberty Law, the only restrictions that the state can impose with regard to the right to religious freedom have to do with public security and with the principle of doing no harm to others. Strong ties are nevertheless maintained between states and dominant churches. In Spain, despite the **mutual autonomy** between the institutions and religious groups, neutrality is limited in so far as public authorities are mandated to cooperate with the Catholic Church, which is therefore given a

higher level of recognition than other religions. The same can be said of Italy, where the 1948 Constitution also lays out an explicit legal agreement between the Italian State and the Holy See. While the Constitution speaks of **mutual neutrality**, it is one in which the majority religion (Catholicism) benefits from unequal support afforded by the state.

Greece offers a case that is close to Italy and Spain in many regards but includes a stronger focus on **majoritarian religious nationalism** (1). Its constitution recognizes Orthodoxy as the 'prevailing religion'. Legal acts and policies on religious matters take into consideration the political interest of the Greek Church (Tsitselikis, 2012: 9) and give it the right to have a say on the activities of all 'known religions'<sup>8</sup> (Hatziprokopiou and Evergeti, 2014), as well as other state affairs, such as the curriculum and textbooks for the class of religious education and morning prayer in Greek schools. It is not a coincidence that the Pew Research Center (2018) recently found that three-quarters of Greeks consider being Orthodox Christian important to being truly Greek, while nearly nine-in-ten say Greek culture is superior to others (2018: 6). Western Thrace may seem to stand out against this, where Muslim religious institutions are more fully recognised. This is, however, territorially confined and these arrangements for the 'old Islam' in the country do not extend to 'new Islam' of more recent immigrant populations in other parts of the country, or even to Thracian Muslims who move out of Thrace.

Turning to South-Eastern Europe, Albania and Bulgaria were careful in not privileging the dominant religion and in instituting **separation of church and state** characterized as a **two-way autonomy**, although the dominant religions continue to be privileged. Nevertheless, this includes the presence of **some government control** of religion, as well as of **some support for religion** and cooperation with some religious organisations for the fulfilment of common goals. In Albania, all religious communities (once officially registered as such) are regarded by the state as juridical persons. Within the region, BiH presents a peculiar case. On the one hand, its legal framework of freedom of religion and state-religion relations, as well as its favouring one religion over the others, coincide with those of Italy and Spain. They are, however, the product of very different polities and recent histories. The post-war society of BiH has had to reconceptualize the relationship between the state and its different religious communities. Since each territorial entity is responsible for its own relationship with the religious communities and organisations it hosts, such relationships have often proven highly favourable to the dominating religious group in each territory. This has created situations in which some minority religious groups in certain entities have not been accommodated or respected in ways equal to the respective majority religious group and these persisting divisions and tensions fail to lead to a viable state-religion model that would allow for more national unity.

In sum, if we look at Southern and South-Eastern Europe as a whole, what emerges is a region that shares, despite its numerous internal diversities ranging from historical trajectories to legal

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<sup>8</sup> The term 'known religion' appears in Article 13, paragraph 2 of the Greek constitution. According to the Council of State and the Supreme Court, it denotes any religion that is public, with no secret rituals or dogmas, which do not constitute an unlawful union, or a fictitious association or organization with illegal aims, and its purpose must not negatively affect public order or morals.

systems, a strong primary legislation rooted in the DON of **freedom of religion**. This means that all countries examined include moral individualism, freedom of conscience and toleration for all religions in their constitutions and/ or primary legislation. They all, furthermore, bear some features of **moderate secularism**, offering some kind of support and regulation towards religious institutions on behalf of the state. Nevertheless, how these regional points of similarity look and contrast within the region is shaped the variance and emphasis of other norms that operate in each country.

That being said, when it comes to strong state-religion connections, religion has played a fundamental role in defining the ‘imagined ethnos’ and national ideology thus leading to the emergence of significant QONs that shape the socio-political reality on the ground. This means that in many instances, the national and religious identities are intertwined and constructed in opposition to religious ‘Others’. To differing degrees, forms of **majoritarian nationalism** qualify FoR in the region, most strongly in Greece but also present in the cases of Italy, Spain (which have weaker ties with a single religion) and Bosnia and Herzegovina (where the territorial governance is organized in such a way that each region may favour the local religious majority, therefore showing strong plural ties to different denominations). This also arises in the case of Italy, Spain and Greece as a reaction to an increased immigrant presence and a shifting composition of the population in favour of plurality. A further qualifier is a degree of **secularist statism** found in Albania and Bulgaria, a legacy of the process of forced secularisation under communism, but this itself is combined with and qualified by respect for mutual autonomy and religious freedom driven at least in part by the wish to integrate into the European Union.

### 5.3 Central Eastern Europe and Russia

Though the countries of the region of Central Eastern Europe and Russia share much common history and recent experiences, the models of SRCs found in them somewhat differ.

Lithuania continues to be underpinned by **freedom of religion and moral individualism** (3). The Constitution declares that there is no state religion in Lithuania, theoretically ensuring formal equality vis-à-vis the state and between religions and practically all religions are **officially and socially tolerated**. Nevertheless, it also distinguishes between nine faith communities as ‘traditional’ as well as officially ‘recognised’ religions, and those that are just communities and associations, and conditions such as numbers, permanence and social acceptance are required to be met to become ‘recognised’. Moreover, ‘recognition’ may be withdrawn if they act in ways contrary to the values of the state and the stipulation of ‘having the backing of society’ is too fluid and may be manipulated by interested parties, foremost politicians, who make decisions on who from among religious communities is to be promoted to a higher rank. This also means that religions in Lithuania legally enjoy unequal status and receive **different levels of state support as well as public roles** in areas such as education

depending on which tier they come under. The ‘traditional’ religious communities, for instance, receive state funding – even though no law requires the government to financially support any religious community – and, moreover, face low levels of state control in that they may use the received funds at their own discretion and are not required to report back to the state on how the funds were spent. This distinction and inclusion of nine denominations reveals **certain features of pluralistic nationalism** (difference-sensitive identity recognition and institutional accommodation of religious diversity) but also compromises the principle of the state’s secular neutrality. Moreover, in practice the Roman Catholic Church gets preferential treatment from the state and public institutions as a result of its numerical dominance.

Slovakia came to clearly represent the model of **majoritarian nationalism** grounded in a freedom of religion for only registered (state-recognized) faith communities, with some features of **secularist statism and is restrictive of SRCs**. On the one hand, as may be expected of an EU member state, the constitution unequivocally guarantees religious freedom and establishes mutual autonomy between the state and religious collectivities and their organizations. The regime of governance of religion in Slovakia operates on a one-tier principle – all registered religious organizations are treated as equal before the law. The Roman Catholic Church, however, has a privileged status, as Slovakia has signed a Concordat with the Holy See. Moreover, in 2016, in the wake of the so-called ‘European refugee crisis’, the Law on Religious Freedom and the Legal Status of Churches and Religious Organizations was amended, tilting Slovakia’s model toward clearly **majoritarian nationalism** in two ways. First, the State identifies with and extends support to practically one religion – Christianity - and includes toleration for only those faith communities that are registered. Second, the minimum number of members for the registration of a religious organization rose from 20,000 to 50,000, effectively killing off the chances of any new faith communities institutionalizing their religion in the country. Religious organisations not meeting the new criteria have to register as NGOs and not as religious organizations, losing rights to build and own places of worship and other property, establish institutions of religious education, provide pastoral care, lobby for diet, religious feasts and clothing related rights and so on.

Russia and Hungary likewise share a general freedom of religion for registered (state-recognized) faith communities, and which includes many elements of secularist statism with official tolerance towards other religions and majoritarian nationalism that demonstrates favouritism towards Orthodox Christianity. In both cases a limited number of religions are officially recognised and the state plays an active role vis-à-vis the regulation and the utilization of certain religious denominations and features many elements of **majoritarian nationalism and secularist statism**. The current character of SRCs in Hungary was established after the coming to power of the current FIDESZ party dominated government in 2010, which has brought back some aspects of religion and religious organizations from the private to the public sphere. The new Basic Law still defines the Hungarian state as separated from religious communities and freedom of religion is guaranteed but allows the government to cooperate with religious organizations for certain public interests or goals. In practice, this means that the state and the government may decide to sign a so-called cooperation agreement with certain religious organizations who then take over certain responsibilities from the state in return for

financial assistance (education, social care, etc.). The Basic Law also identifies the state as having a clear Christian heritage, the result being that the government signed cooperation agreements with the major Christian churches, as well as a number of Jewish groups. The character of these agreements, however, is of a political tool to exert influence over religious organizations. Moreover, a tiered system gives clear preference and advantage to ‘old’ over ‘young’ religious communities, and has also allowed the government to marginalise others. Methodists have struggled to operate their schools and social institutions since the government rescinded funding after one group was critical of some of its policies and no Muslim groups have been offered cooperation agreements. Preserving Hungary’s Christian identity has also been used by the government to shape public discourse on international migration, which has been linked to Muslims and Islam and put into a security framework. Even though the government emphasises that Muslims in Hungary are free to practice their religion and enjoy the protection of the law and the state, the government is also clear about not wanting any more Muslims to settle down in the country in big numbers (Portfolio.hu, 2015).

In Russia, officially, no religious group is allowed to participate in the state’s political life, create or finance a political party, although there are close ties between the state and dominant Russian Orthodox Church and the religious authorities of the institutionalized religions often make public statements in support of state politics. Religious groups not considered ‘traditional’ cannot be registered as organizations or be politically active (or potentially active) and non-registered groups experience regular pressure and persecution; the Jehovah’s Witnesses, for instance, have been banned since 2017 – a move welcomed by the ROC. Due to the rise of political Islam, some Muslim groups (such as Salafist) became a subject of more active persecution than others. It is also noteworthy that the implementation of the principle of secularism differs in different units (republics, territories, regions, cities of federal importance, autonomous regions, autonomous districts) of Russia. In some federal units, religion plays a more prominent role than in others and even has been partly incorporated into the state and law. The stated secular character of the country might also gradually change. The referendum held in March 2020 approved the inclusion of the word “God” into the new version of the Constitution.

Based on the above, although there is a common formal foundation of freedom of religion, in many countries the state identifies with one denomination and only the institutionalized forms of religion (registered religious organizations) are allowed to operate publicly. This is one of the most striking commonalities in regards to SRCs among the countries of the CCE and Russia. Consequently, individual freedom and institutional accommodation is offered only for believers of registered religions qualified by severe diversity restricting toleration and there has been a rise of religious nationalism of identarian nature throughout much of the region. At the same time, the spiritual administrations of the favoured ‘traditional’ religious communities may opt for public support of the government policies (in fact, this is already observable in some of the Višegrad countries) and also seek to promote their own ‘de-secularization’ agenda. Whereas religion can often be seen as a public good and supported, this is restricted and politicised, and religion will just as easily be seen as a danger and restricted and controlled.



Lithuania stands out here, where moral individualism and freedom of conscience remain paramount and practically all are religions officially and socially tolerated.

## 5.4 MENA

Overall, the region represents **majoritarian nationalism** (1), whereby Turkey, Egypt, Tunisia, and Morocco **identify with one religion**, Sunni Islam, which is an integral part of their national identity. This usually includes **toleration for other religions**, particularly Christianity and Judaism, mainly because these two religious traditions are recognized by Islam. The legal frame of the four countries insists on the freedom of conscience, reflecting an aspect of freedom of religion; however, there is also a meta-legal privileging of Islam (through declarations that Islamic sharia is the source of legislation) and in practice **religions don't enjoy equal status, and are not all officially and socially tolerated**

Egypt, Tunisia and Morocco all identify with Islam, which forms a point of **majoritarian and identitarian nationalism** in each country and is also the basis of legal codes. Christian and Jewish minorities are recognized as 'people of the book', and can refer to their own legal-codes in some instances, but non-Abrahamic faiths and non-believers are largely unacknowledged. Moreover, Christians and Jews are also disadvantaged in relation to the Muslim majority when it comes to state support and restrictions on their activities.

The Tunisian state seeks to ensure its full **control over the religious sphere** as 'the guardian of religion' (article 6 of the constitution). After the more secularist statist Ben Ali regime was toppled in 2011, the security apparatus lost control over the religious sphere, and ethnic and religious minorities have benefited from the new political environment to express themselves and defend their interests – although Baha'i have not been granted any legal recognition. However, as state institutions have started to regain their strength and legitimacy, since 2013 successive ministers of religious endowments have been working to extend the ministry's control over all mosques and imams and close all illegal mosques. In Egypt too, the Arab Spring weakened state control over the religious sphere. Between 2011 and 2013 the Egyptian state was effectively controlling and supervising fewer than half of Egypt's mosques (Gomma, 2013). The new political regime, like its predecessors, consequently sought to acquire an absolute monopoly over the religious sphere, bringing all mosques in Egypt under its control and prohibiting people that did not have official authorization from delivering sermons. Al-Azhar has managed to retain independence, however; its Council of Senior Scholars is to be consulted in matters relating to Islamic Sharia, the state ensures sufficient funding for Al-Azhar to achieve its objectives and al-Azhar's Grand Sheikh is independent and cannot be dismissed. In Morocco, the King forms the only political institution that is constitutionally allowed to combine both political and religious powers. The Ministry of Endowments and Islamic Affairs (MEIA) is one of the key institutional instruments that falls under this authority of the king. It monitors the content of sermons in mosques, Islamic religious education, and the dissemination of Islamic religious material by broadcast media. Construction of new mosques, including those constructed using private funds, require authorization from the MEIA. Moroccan law

penalizes the use of enticements to convert a Muslim to another religion and prohibits criticism of Islam. All publicly funded educational institutions must teach Sunni Islam in accordance with the teachings and traditions of the Maliki-Ashari school of Islamic jurisprudence. Foreign-run and privately funded schools have the choice of including or omitting religious instruction within the school's curriculum, and private Jewish schools may teach Judaism.

Turkey has often been thought to represent an exception, the constitution describes Turkey as "secular" (laik, after the French *laïcité*), yet we can observe a shift from a form of secularist statism to a more recent form of majoritarian nationalism, as political power shifted from secularists to Islamists. Sunni Islam is practically the official religion of the state, and Turkish national identity is closely tied to Islam (Gülalp, 2021: 193). As a legacy of the Ottoman *millet* system, religion retained its centrality in Turkish national identity (Cagaptay, 2006). Kurds, for example, as non-Turkish-speaking Muslims, were considered capable of assimilation into the Turkish nation, but non-Muslims were always assumed to be inassimilable and fundamentally alien. Non-Muslim citizens of Turkey are not considered Turkish; they remain 'step-citizens' of the Republic, with significantly curtailed citizenship rights (Ekmekcioglu, 2014). Hence, The Turkish nation is primarily imagined as a Sunni Muslim entity (Gülalp, 2021). The republican institution of the Directorate of Religious Affairs (DRA) has been often accused by other religious groups, such as the Alevis (the largest sectarian Muslim minority in Turkey), of only representing the Sunni version of Islam, while as a republican institution it should serve all religious communities (Çarkoğlu and Bilgili, 2011). The DRA was designed as an administrative tool to 'regulate' Islam within Turkish society and thus to control its institutions and its followers (Gözaydin 2008: 216). Under the rule of the AK party, the DRA role shifted from ensuring state control over religion, including limiting the extent of its presence in society, to the **state's religious control over society** (Gulalp, 2021), operating through a wide range of responsibilities in the realm of social and cultural life such as keeping values and morals alive, educational infrastructure, the economy, gender relations, and so on (Cengiz, 2014; Kandiyoti & Emanet, 2017; Karapehlivan, 2019; Adak, 2015; Akan, 2017; Mutluer, 2018; Gulalp, 2021). While there is a great variety of non-Muslim beliefs currently practiced in Turkey, only three have official recognition, as inherited from the Ottoman period, and confirmed by the Lausanne Treaty of 1923 – Armenians, Jews and the Greek Orthodox. These three have the right to run their own schools and houses of worship but whether recognized or not, none of these non-Muslim communities has legal personality, and so their property and other affairs are managed through foundations or civic associations.

The case of Lebanon follows a different pattern from the rest of the region and represents a federation of religious communities with their own religious and political authority. In contrast, to the above cases, Lebanon reflects aspects of **pluralistic nationalism** (6) but without the unifying national citizenship that this mode assumes. It is a case of frozen identities defined at the point of foundation of the state of Lebanon, which nobody has dared touch. It includes **difference-sensitive identity recognition**, as citizens are indeed classified according to their (officially recognised) religious identities as well as, **institutional accommodation of religious diversity**, as the confessional system is precisely based on the granting of political rights to the institutional structures of (officially recognised) religious communities. The

Lebanese regime is **accommodative of differentiated legal status** of the different religious communities and guarantees religious **groups' autonomy**. These groups are also often **active and present in public and political life**. The three main centres of powers: the presidency (led by a Christian Maronite), the parliament (led by a Shia Muslim) and the government (led by a Sunni Muslim) are likely to cooperate to reach political compromises to avoid the experience of the civil war. The Lebanese regime has managed to survive primarily because of its elites' willingness to remain and work within the framework of confessionalism and consociational democracy (Taşkın, 2021: 208). However, while these characteristics are often framed as 'positive' features of a regime of governing religious diversity, in Lebanon this system has led to continuous tension, political turmoil, including a prolonged civil war, and a persistent demand for a secular regime that transcends the current system of recognising religious diversity. The Lebanese model, in so far as it does not offer a strong sense of citizenship over its forms of communalism, contests the common wisdom that state's official recognition of the religious identity of citizens and their treatment according to those identities will necessarily lead to a more liberal, peaceful, diversity-enhancing and democratic governance of society.

The broad cultural and religious diversity in the region has been tackled through suppression of religious and ethnic sub-identities in favor of one national identity (Turkey, Tunisia, Morocco, and to a less degree Egypt), and with majoritarian nationalism therefore characterizing the regions DONs. There are QONs that reflect features of legal and institutional pluralism, but these remain heavily controlled and marginal. This **majoritarian nationalism** is not merely identarian or a privileging of Islam but involves extensive control of the religion and its followers. The exception is Lebanon, which has institutionalized (limited) diversity. Both paths have failed to guarantee pluralism. Suppression has only led to further fragmentation of societies, while institutionalization of the various religious and ethnic communities, has led to the creation of new religious and ethnic centers of power that do not necessarily represent the interests of their communities.

## 5.5 South and South-East Asia

Overall, the region reflects a mode of **pluralistic 'unity in diversity' nationalism** (6). All three countries profess some degree or kind of secularism and freedom of religion, albeit in different ways and this is further qualified, however, by increasing **majoritarian nationalism** (1) that is limiting of diversity, albeit that this is emerging in different ways.

Freedom of religion in India includes freedom of religious practice in a more expansive sense than found in liberal democracies. As a form of **difference-sensitive identity recognition** (6) this means that all communities, minorities and the majority, have the right to observe their religious practices including social cultural practices emanating from or linked to religion in the private and the public domain. Although in India the state and religion are not closely intertwined, one finds **religion present and active in the public and political domain** (6) and vice versa, the state foraying in the domain of what would be considered matters of religion. For example, the constitution allows government/state to regulate secular affairs - financial

matters, matters related to property, management of trusts etc. - of religious institutions. On the other side, religious groups mobilize, lobby and are actively present in the public domain. In this way India steered away from the accepted liberal secular framework and permitted greater mingling of state and religion. The framework devised included a **legal pluralism accommodative of differentiated legal status**; for matters relating to family (marriage, divorce, inheritance) all persons were to be governed by the personal laws of their community. This was a complex system of religious governance that after formally giving equal rights to all persons saw individuals as belonging to different communities – giving **considerable legal space to group autonomy** (6). On this basis successive governments have, by and large, been reluctant to intervene in religious practices even when these clash with principles of gender equality or personal autonomy. In some ways this requires the courts to assert a certain competence in religious affairs. When conflicts emerge between practices and rights, the Supreme Court applies what it calls the ‘essential practice’ test and in this way, it plays a role in determining matters of religious belief and practice in law. Religion is thus both **supported but also regulated** (4).

The state often acts to ensure that communities can perform their religious practices without external hindrances and is often administratively involved in this. No formal role is accorded to religious communities in public policy and decision-making bodies, and no separate or special representation is given on grounds of religious identity, although a deliberate effort was made to have members from all communities in the highest decision-making bodies (the central cabinet) and other prestigious public positions. **Formal accommodations are made in the public sphere**. For instance, in India, major religious festivals or events from all religions were included in the list of public holidays, and national symbols were chosen that were acceptable to most communities or perceived as being inclusive (Parekh, 2015). In terms of **institutional accommodations**, community institutions also have considerable autonomy to regulate their religious affairs, and some are formally recognized regarding their respective communities. They can establish educational institutions to impart the ‘education of their choice’ and were given the right to conserve their distinct language, culture, and script. The formal framework for the governance of religious diversity was in practice accompanied by a slew of informal measures and **informal gestures of accommodation have played a critical role** in nurturing a sense of being counted and treated as equal. Claims relating to religious practices and observances are taken seriously and, in normal circumstances, an effort is made to accommodate them. However, religion also remains a volatile subject. India put in place a constitutional framework to accommodate diversity that remains more or less in place, but has become overshadowed by a militant and violent Hindu nationalism with riots and lynchings of Muslims, creating a severe strain on the deep diversity at the political, judicial and police levels and putting the everyday, informal modes of accommodation that are under stress.

In Malaysia and Indonesia, there are **formal institutional accommodations** for religious diversity. This can clearly be seen in education, where religious institutions are allowed to set up their own educational centres as long as it is kept within their own religious community. Also, religious minorities that are recognised by the state are allowed public funding for their own initiatives. In Indonesia recognition of diversity includes recognising religious

observances of different faiths. The Indonesian government respects the holy days of Muslims, Christians, Hindus, Buddhists, and followers of Confucianism as national holidays for all Indonesian citizens. In terms of religion and politics in Indonesia, when it comes to **religious minority group participation in political life**, national legislation, with some caveats, grants all religious minority groups rights to participation. Religious groups also play **a significant role as pressure groups in politics and policy development**. Although legislation is formally the duty of parliament, in most cases, it would not run smoothly and would not be gazetted without any agreement from pressure groups, be it formal or cultural. There are thus formal channels, but in practice these are not always realisable for minority groups.

Religious identity is an important marker that defines the individual citizens vis-à-vis the state in Malaysia and Indonesia. Both mandate national identity cards, for example, designed to specify the religious affiliation of the card holder and in this way, ethnic and religious identities tend to be conflated and fixed in the realms of politics, cultural expression and everyday social norms. This bureaucratic practice can blur diversity, as in Indonesia for instance, by classifying indigenous believers under a single grouping. Also, atheism is not recognised in either country – in Malaysia, for example, it was also argued by some high officials that atheism is anti-patriotic since the first out of five principles of Rukun Negara (National Philosophy) declares that every citizen is expected to believe in God.

In Indonesia and Malaysia there are also strong shifts towards majoritarian nationalism and freedom of religion is subject to important constraints that privilege Islam. In Malaysia in recent decades, a growing trend of theocratic nationalism has found greater political purchase, according official or preferential status to the dominant form of Sunni Islam, while the Shafi'i school of thought assumes the legal basis for Islamic jurisprudence. A series of constitutional amendments has given sharia courts increased autonomy to adjudicate disputes arising under Islamic law and the 'sharia-isation' in the discourse and practice of the country's legal corpus is a significant aspect of this. Many positions of high political office are in practice reserved for Muslim candidates. Despite guaranteeing freedom of religion, in practice, freedom of religion is subject to several important constraints. For instance, the right to propagate any religious doctrine or belief among Muslims is restricted, to build places of worship one needs to get permission from the local administration and this can prove difficult, and Muslim groups are privileged in access to state funding. State run inter-faith dialogue channels are considered by many scholars and observers to operate around the premise that Islam is much superior to other religions in the country. This also negatively affects Muslims that are deemed heretical and a deviation from orthodox Sunni theology and jurisprudence; Shia' are deemed illegal and subject to action by religious authorities. In theory, any political parties (including the religious-based political parties) are free to have their organization registered and run their activities. In practice, however, non-Islamic groups are often restricted from organizing any activities that may be justified as a threat to the superiority of Islam in the country. In Indonesia, because Muslims form the major religious group, the regulation, control and facilities given by the state to Islam is considerably greater compared to other religions. At a practical level, the Islamist and politically oriented Muslim groups are increasingly showing more assertiveness to demolish secular barriers and seek for the integration of politics and religion in wider

contexts of Indonesian society, in part a response to what many believe have been strict regulations towards Islam by previous governments.

In so far as South and South East Asia (on the basis of the three cases considered here) can, on the whole, be considered an example of a region that reflects **pluralistic nationalism**, we can identify two important starting points for all these three countries which bears on how freedom of religion is conceived. One is recognition of the presence of many different religions. The other is that the state operates with the notion of an embedded individual (not an abstract individual), with individuals being seen as members of a religious and ethnic community, and thereby **based in primacy of group autonomy, moral groupism and toleration**. These, therefore, form the region's DONs.

However, the region is also characterised by QONs of **state-religion institutional connections and religions' active presence in public and political life**. On account of this, religious diversity can be positively encouraged and may lead to further pro-diversity QONs and policies through **difference sensitive recognition and institutional accommodations**. Yet these remain politically contingent and often applied in unsystematic ways. Religion and its connections to state and recognition might also be an aspect of its management by the state and a vehicle for majoritarian nationalism that introduces strong currents of **diversity limiting ethno-religious nationalism**. This might operate through the legal system and political processes, including policy making and be argued to have constitutional grounding. An exception here, however, is India's more settled secular arrangement combined with legal pluralism, although this can serve to limit the freedom of religion groups within communities, such as women or 'minorities within minorities'. The question of majoritarianism and its relation to severely limiting religious diversity and freedom of religion therefore is the dominant current trends and hangs over the issue of the governance of religious diversity in the region.

## 5.6 Summary

In summary, we can make the following observations based on our intra-regional comparisons, and which are represented in Table 2 below, and which capture and allow us to characterise a layered analysis of the regional, intra-regional and current trends.

**Europe as a whole** reflects a DON of freedom of religion based in moral individualism and a general toleration of religions, although their statuses vary. Beyond this, there are significant differences between and within each region. Inter-regional differences will be discussed further in section 6 below, but we can note here a key balance in emphasis between those cases where features consistent with moderate secularism and equalising upwards prevail, and those where secularist statism or majoritarian nationalism are particularly pronounced, and are becoming more so. Intra-regionally, we can say that for **WE** norms of moderate secularism form the main DONs, qualified by some features of pluralistic nationalism and, particularly when it comes to Muslims and Islam, increased state interference. France is the exception here, where secularist

statism forms the DONs, qualified by some instances of positive SRCs. Australia, as our geographical outlier, is more firmly anchored in Freedom of Religion as its DONs, qualified by some SRCs, especially at regional levels. **SEE** is a mixed bag, FoR forms the DON for the region but features of alternatively, majoritarian nationalism, secularist statism, or moderate secularism qualify it in various ways. **CEE** is similar in this regard, with Lithuania also qualified by principles of moderate secularism. **MENA** represents DONs principally drawn from a majoritarian nationalism, which goes beyond the identarian and the privileging of Islam and involves extensive state control of religious institutions and believers. There is some qualified recognition and SRCs for a limited number of minorities reflecting aspects of pluralistic nationalism, although this is subject to heavy pressures in practice. Lebanon is the notable exception here which is grounded in pluralistic nationalism but one which operates in ways that also reflect sub-state majoritarian nationalism. **SSEA** represents DONs drawn from pluralistic nationalism, but these are increasingly qualified by aspects of majoritarian nationalism, manifested in either legal changes or militant, intolerant nationalism or both.

**Table 2. Comparison of Modes and Norms by Region**

Majoritarian Nationalism	Secularist Statism	Freedom of Religion	Moderate Secularism	Liberal Neutralism	Pluralistic Nationalism
<b>European regions</b>					
		<b>BELGIUM</b>	<b>Belgium</b> ↑		
	<b>France</b> ↑	<b>FRANCE</b>			
		<b>GERMANY</b>	<b>Germany</b> ↑		
		<b>UK</b>	<b>Uk</b> ↑		<b>(UK)</b>
<b>Greece</b> ↑		<b>GREECE</b>			<b>(Greece)</b>
<b>(Italy)</b>		<b>ITALY</b> ↑	<b>(Italy)</b>		
<b>(Spain)</b>		<b>SPAIN</b> ↑	<b>(Spain)</b>		
<b>Hungary</b> ↑		<b>HUNGARY</b>			
		<b>LITHUANIA</b>	<b>(Lithuania)</b> ↑	<b>(Lithuania)</b>	
<b>Slovakia</b> ↑		<b>SLOVAKIA</b>		<b>(Slovakia)</b>	
	<b>Albania</b> ↑	<b>ALBANIA</b>	<b>(Albania)</b>		
<b>BiH</b> ↑		<b>BOSNIA</b>	<b>(BiH)</b>		
	<b>Bulgaria</b> ↑	<b>BULGARIA</b>	<b>(Bulgaria)</b>		

Non-European regions					
Russia ↑	Russia	RUSSIA			
		AUSTRALIA↑	(Australia)		
(Lebanon) ↑					Lebanon
TURKEY ↑					
EGYPT ↑					(Egypt)
MOROCCO ↑					
TUNISIA ↑					
(India) ↑		(India)			INDIA
(Indonesia) ↑					INDONESIA
(Malaysia) ↑					MALAYSIA

\* UPPER CASE text denotes regional DONs. Lower case text denotes country specific DONs (unless already covered by the regional DON). QONs are shown in brackets (again, where not already covered).

\*\* arrows indicate the direction of travel, i.e. which mode is most pronounced in the current challenges regarding religious diversity in each case, and so which are headed towards neutrality, moderate secularism, or greater restrictions, for instance.

## 6. Convergence and divergence: Inter-regional

Whereas the previous section focussed on intra-regional points of similarity and difference between country cases, this section turns to address inter-regional points of convergence and divergence. The purpose of the discussion of this section, however, is not simply to put into prose what is presented in tabulated form above (Table 2), but to present a comparative conceptual analysis of key terms and how they travel between our regions.

**6.1** There are a few conceptual commonalities across the different regions considered here and on which this section further elaborates:

- 1) They have all grappled with secularism and many, although not all, have professed and continue to profess some form of secularism.
- 2) The notion of freedom of religion<sup>9</sup> is professed in all cases but comes to look quite different in different contexts; the freedom of religion of a secularist statist country is quite different from that of one characterised by moderate secularism or pluralistic nationalism, for instance. A significant aspect of this relates to the dimensions of freedom of conscience and freedom of

<sup>9</sup> NB, this is not referring to the mode of Freedom of Religion, number 3 from Table 1, but to the notion of freedom of religion and its two dimensions, inner and outer, of freedom of conscience and freedom of worship/practice.



worship or practice. A further dimension to this is an often-marked difference between freedom of religion *de jure* and *de facto*, where the gap between formal measures, such as constitutional provisions, on the one hand, and practice, on the other, often, although not always, reflects diversity restricting approaches.

3) The relationship between national identity and religion is something present across the cases, although in markedly different ways, and in many it is intensifying.

We can begin with secularism and by returning to our minimalist definition of political secularism from WP1.1:

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.

If this is our core and minimalist definition of secularism, we also need to recognise that all states have some form of connection with religion, a strict separation is not evident anywhere (Perez and Fox, 2018: 2). We can therefore add to this minimalist definition:

Secularism can additionally be supportive of autonomy of organised religion and freedom of religion too. For empirical as well as theoretical reasons this two-way autonomy does not mean strict separation and 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 providing it does 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).

So here we have a minimalist definition of political secularism and what we might call a minimalist+ definition which preserves the minimalist insistence on political autonomy but includes state-religion connections (SRCs) and mutual autonomy in its scope. This, moreover, helps us avoid what Maclure and Taylor (2011) have referred to as a ‘fetishism of the means’ of secularism, where means to achieve political secularism, such as church-state separation, become ends in themselves. We can then shift from foregrounding the idea of separation and its extent to foregrounding connections. If we accept that connections are a feature of all secular societies, what becomes important, and what our disaggregated norms allow us to explore and assess, is the character and extent of these connections.

From these introductory observations, we can begin to outline different dimensions and characteristics of political secularism and SRCs, and can begin to characterise our modes of governance of religious diversity against them in a way that allows us to assess the how the core notions of political secularism and freedom of religion travel between our cases. Table 3 below presents the dimensions outlined above against our minimalist definition of political secularism and our modes of governance from Table 1. We can make an initial observation.

All modes are compatible with minimalist political secularism except majoritarian nationalism, which presents a different understanding of the basis of how identity is conceived and subsequently how the state relates to citizens and citizens to the state. Pluralistic nationalism sits on the border on both these counts, suggesting that how and which features of other modes have a qualifying role is significant in this regard.

The inter-regional discussion that follows draws upon these dimensions to highlight points of convergence and divergence between our five regions and assess how the core ideas of political secularism and freedom of religion travel between them. Although this section as a whole presents an inter-regional comparison, intra-regional differences are also drawn out as part of keeping in view a multi-level perspective.

**Table 3. Characteristics of modes according to different dimensions of minimal definition of political secularism**

<b>Minimalist definition of political secularism</b>	Modes → Dimensions ↓	<b>Maj Nat</b>	<b>Sec Stat</b>	<b>FoR/Lib Neut</b>	<b>Mod Sec</b>	<b>Plu Nat</b>
Civic	<b>Identity</b>	Ethnic/ethn o-religious	Civic – ‘neutral’	Civic – ‘neutral’	Civic – ‘weak multi’	Civic – ‘strong multi’
Not necessary but compatible	<b>Mutual autonomy</b>	Low	Low	Medium	Medium	High
High	<b>Freedom of religion (conscience)</b>	Low	High	High	High	Medium
Low (but higher is compatible)	<b>Freedom of religion (practice)</b>	Low	Low	Medium	Medium	High

Individual	<b>States relation to citizens</b>	ethno- religious	Individu al	Individua l	Individua l (+ ethnic/eth no- religious)	Ethnic/eth no- religious (+ individual )
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**6.2** For the purposes of our comparative analysis, we can start in Western Europe. All the country cases in this region fit the minimum definition of political secularism set out above, and the UK, Belgium and Germany also fit our minimalist+ definition, while the balance in France tips towards a more one-way autonomy (hence ‘radical secularism’ (Modood, 2010) and Australia might be seen as in-between. These countries also all have relatively weak ties between nation and religion, in so far as the influence of religion in political life has declined significantly as religious diversity has grown. While they undoubtedly identify with a Christian past in ways significant for religious diversity, this is not identarian in a strong sense in that it is not an exclusive identity where religion and ethnicity are tied together and might also recognise minority identities in important ways.

They also all have important connections between state and religion, even in France there is no actual ‘absolute separation’. The key difference here is in the balance between religion treated as a public good or danger and between state control of or autonomy for religions. Whereas one has a general respect of religion, the other is limited to tolerance. In terms of SRCs, the former comes, albeit in often limited ways, to reflect the diversity of the polity in key public ways, such as in education or welfare, while the latter limits the multi- of these identities, preferring a uniform conception of identity and leaning towards assimilation. One of the pivot points on this balance is between ‘regulation’ and ‘control’, where France falls into the latter. We might also say that France is distinct in having stronger ties between nation and secularism, where public identity and how the state relates to citizens is more strongly secularist in identity terms.

A further point of difference relates to freedom of religion. In both cases freedom of religion is based in moral individualism and freedom of conscience, but in the case of moderate secularism this is the basis for public religion and for France it is confined more to the private sphere as it is qualified by secularist statism. When it comes to freedom of religion in terms of practice and politics, again there are intra-regional contrasts. While all states guarantee freedom of conscience as an absolute right, freedom to practice is a qualified right, and qualified in different ways. We can note the general absence of religious language and reasoning in political debate; even, for example, arguments for ‘religious clauses’, advocated for and gained as part of the Equality Act 2010 by a range of faith groups in the UK, adopted a rights rather than religious discourse (Hunt, 2012). Nevertheless, the character of SRCs differ, where moderate secularism includes the recognition of religion as a public good but is privatised to a greater degree in France; debates around public funding for a Grand Mosque in Marseille have revolved around it acting as a cultural rather than religious centre offering classes open to all.

An interesting point here also turns on differential treatment when it comes to restrictions, regulation or control. In all four cases Muslims and Islam have been the recent focus of such measures but a notable difference is that whereas in the UK, Belgium and Germany they have not affected governance of religious diversity measures as such, in France, owing something to its stronger brand of secularism and despite being targeted at Muslims, they have applied more generally and affected people of other faiths – following the ban on ostentatious religious symbols in public schools, for instance, pupils who were Christian and Sikh were also expelled (and thus referring to the bans as ‘headscarf bans’, while accurate in terms of their intended target, misses this wider effect for the governance of religious diversity). We should note that Germany is something of a mixed picture and that some regions also brought in general bans on headscarves for teachers in public schools (Joppke, 2007). This has changed recently in France, where the new charter of republican values that has been introduced has specifically targeted Muslim organisations and mosques and Muslim organisations have been forcibly closed by the state, measures which are not applied to other religions and which represent a shift in the severity of control the state is seeking to assert. Evident across the region in responses to recent challenges focussed on the region’s Muslim population and Islam are increased regulatory measures of Islam alongside efforts at institutionalising Islam in ways seen to be more at home with a, for instance, German or British Islam. France excepted, this balance falls short of majoritarian nationalism or secularist statism.

Starting with WEA already gives us differing perspectives on secularism, split by the balance of ‘autonomies’ and thereby levels of control/regulation, and freedom of religion, by public presence facilitating aspects of freedom to practice. There is also a distinction with regard to identity and its relation to state, albeit this is in France’s strong insistence on a secularist identity tied to the idea of nation and state more tightly individualised.

**6.3** Turning to Southern Europe, again the country cases fit our minimal definition of political secularism. Here, however, the ties between nation and religion are stronger, state regulation higher and the types of recognition associated with moderate secularism lower.

Freedom of religion is, similarly to WEA, based in moral individualism and freedom of conscience, but with more prominent features of majoritarian nationalism in some cases or secular statism in other cases, which weaken the mutual autonomy of state-religion relations and accommodative character of SRCs. This is one of the key contrasting points in relation to WE, and which gives a different character to political secularism found in some parts of the region. To differing degrees, features of majoritarian nationalism qualify the DONS of FoR in the region and curtail the public character of religious diversity. This is perhaps weakest in Spain, Italy and Albania and strongest in Greece and Bulgaria. In those countries where it is weakest, FoR and SRCs are mediated by features of moderate secularism, and thereby of public religious diversity. BiH, as something of an outlier in its more multi-confessional arrangement, nevertheless, is perhaps also characterised as akin to a form of sub-state majoritarian nationalism, where these features operate within differently dominated confessional regions rather than in one overarching state-wide way. This serves to distinguish the colour of

secularism here from that of WE (France apart). A further similarity between WE and much of SEE, especially perhaps Spain, Italy, Greece and Bulgaria, is the trend of increased scrutiny and regulation of countries' Muslim populations or exclusion of them from standard SRC routes in the contexts of fears over radicalisation and an increased immigrant presence.

**6.4** Taking this to Central Eastern Europe and Russia, we again find the common factor of freedom of religion grounded in moral individualism and freedom of conscience, and again the countries here fit the minimalist definition of political secularism. Considering the cases in this region, however, begins to draw out more clearly two main points of contrast with other European regions. The first pertains to identity, and the second to the mode of majoritarian nationalism, and this latter will also be extended in the following section on the MENA region.

The practice of freedom of religion, and particularly its public character, distinguishes how secularism operates in the region. We can begin with the exception, Lithuania, which bears more resemblance to Australia, strongly grounded in Freedom of Religion with features of the moderate secularism of WE. Elsewhere, however, majoritarian nationalism, with a close identification between state and dominant church is an increasingly strong feature of SRCs that qualifies FoR.

One aspect of this that stands out in the region are pronounced tiered systems, where 'traditional' religions are privileged above those which are 'registered' or just 'associations'. This tiered system of recognition is not novel to CEE and is found throughout the regions here and is consistent with moderate secularism (see also for example Laegaard, 2012 on Denmark); we might say that tiered systems within a supposed neutralism are the status quo of SRCs. Nevertheless, their character is marked by differences along the lines of the dimensions of political secularism. The type of privileging that is marked by majoritarian nationalism found in, for example, Slovakia and to an extent Hungary and Russia, is producing close ties between the state and Christianity, and is of a type that works in practice to deprivilege minorities. This is also a relationship where the state exerts strong influence over the dominant church, restricting two-way autonomy. An important point of identification is that we are not merely talking about instrumentalization, which would suggest the *use* of religion by political elites but without a strong and genuine identification. A more straightforward utilisation would be more compatible with secularist statism – the relationship between the Nazi party and German Evangelical Church under the Third Reich or the Turkish state's relationship with Islam prior to the AKP, for instance – but what we are witnessing here is more consistent with the type of identification that is a feature of majoritarian nationalism.

A result of these features is that for other religious groups, there are at times severe restrictions placed on non-recognised religions or denominations who, especially if critical of the government, face high levels of interference and control; one thinks of the Jehovah's Witnesses banned as an extremist group in Russia or the Methodists in Hungary noted above. In contrast to the role majority churches can sometimes play in Western Europe, the role of the majority Orthodox Church can be a barrier rather than support or ally to minority faiths (Sarkissian, 2010). This particularly affects 'new' religions, that is those of more recent populations, but by

no means exclusively, and is reminiscent of how NRMs were targeted in some states in WE in the 1990s. The two-way close identification of state with church and church with state underpins trends of majoritarian nationalism and these shifts or intensifications have tilted further since the refugee crisis.

**6.5** In thinking about the picture of secularism in Europe, focussed on the character of SRCs and those norms which are prominent, we can begin to see certain patterns. All countries meet the minimal definition of political secularism and across Europe there is a common grounding in freedom of religion based in moral individualism and freedom of conscience. This is in common, however, only in so far as it is limited to the private sphere. Key differences come in relation to how this freedom operates in practice and in public, as well as the current direction of travel of SRCs and religious diversity governance, and comes down to the character of connections between state and religion and of professed mutual autonomy. That is, the key differences arise when looking at our minimalist+ definition of political secularism. While in some parts of Europe the influence of the church and church-state bond has receded gradually as religious diversity, including importantly non-belief, have risen, and relations and connections have increasingly come to reflect mutual autonomy and to greater or lesser extents moderate secularism, in other areas of the continent, connections have intensified in identarian ways, where FoR is qualified by features of majoritarian nationalism. As younger nation-states have sought to consolidate following imperial and communist rule, the positions of dominant churches have entrenched, creating problems for minorities, particularly in the context of the refugee crisis a number of these countries have found themselves at the centre of. We can thus note a couple of broad generalities. In countries more characterised by moderate secularism, the relation of religion to national identity is more civic in character and thereby more likely to recognise minorities in ways that enable public roles. In countries more characterised by majoritarian nationalism the relation of religion to national identity is coloured by an imagined ethnos to a greater extent and thereby more likely restrict the public presence of minorities. Notably, however, this is not simply about ethnic identification as Christian denominations that are not part of the dominant church, and especially those critical of the government or that openly proselytise, face the same restrictions. Those country cases that are more characterised by secularist statist similarly restrict public roles but have a more civic national identity.

Turning away from Europe, we can begin to see how these modes and norms compare with other regions.

**6.6** Turning first to the MENA region, it is less certain if the minimal definition of secularism can be applied. Identarian majoritarian nationalism grounded in one religion is more pronounced. In contrast to the observations made above, here majoritarian nationalism has a stronger character by virtue of forming the DONs, which is then qualified in some cases by some limited features of other modes such as FoR or moderate secularism. That is that features of majoritarian nationalism are the qualified rather than the qualifiers. As such national identity is closely entwined with religious identity such that the state, in different ways and through different instruments, actually controls and constitutes itself as the head of Islam and Islam is protected and supported in ways not available to minorities. There are exceptions where this is

mediated by toleration for a couple of historical minorities, but this is often restrictive for these in terms of participation outside of their communities and discrimination against minorities remains widespread and has intensified since the Arab Spring. Moreover, these minorities might be effectively forced to downplay their religious identity in the service of national unity (as has been argued about Egypt and the Coptic minority, Yefet, 2019; Ibrahim, 2015) rather than their religious identity being included in the national identity. These trends are also apparent in Turkey, which although previously perhaps more consistent with secularist statism has, under Erdoğan, increasingly come to represent majoritarian nationalism. Freedom of religion (as conscience) is stated in constitutional documents, in practice however this is not especially operational in the region. Indeed, according to Pew research the region has the highest government restrictions on religion globally and has also seen the greatest rise in these restrictions in the last decade<sup>10</sup>. Lebanon is an exception in formally recognising a multi-confessional polity. This, however, entrenches sectarian lines between groups and sectarian identities. In this it shares features with BiH of sub-state majoritarianism, and perhaps making for an interesting comparison between the two in its own right, as well as provides a point of contrast with SSEA (below).

Recent challenges have directly addressed the state of secularism across the region, where secularists and Islamists have clashed over the role of the state and its relation to religion, and a rise in extremism has entrenched a relationship between the governance of religion and security. While the region is not without a discourse of freedom of religion, this is divorced from practice at legislative, institutional and practical levels. Freedom of religion is more closely tied to citizenship status through ethno-religious identification such that we are not just talking about state-religion connections (SRCs) but the identity dimensions of political secularism here is key here.

**6.7** Finally, we turn to South and South East Asia. On the whole, being characterised by pluralistic nationalism, we can say that the minimalist+ definition applies. Yet, these understandings of a secular state are markedly different from that in European polities. In Indonesia the term ‘secular’ comes with its specific meaning. An important feature of religious life in Indonesia shaping this uniqueness is the claim that Indonesia is neither a state of religion nor a secular state, thus fundamentally adopting a consensus between the two, with the unity of God one of the five principles of *Pancasila*. Similarly, the formulation of Malaysia’s mode of governance in managing religious diversity is predicated upon the spirit and principles of the ‘national philosophy’, the Rukun Negara, which was formulated in 1970 to serve as the foundation of harmony and unity among the various ethnic and religious groups. The Rukun Negara calls for all citizens to be sensitive to and respectful of the concerns of other religious communities, to embrace ‘a liberal approach towards her rich and varied cultural traditions’, but also asserts ‘belief in God’ as a core principle. Despite the contrastingly more secular settlement, India steered away from the accepted liberal secular framework and permitted

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<sup>10</sup> See: <https://www.pewresearch.org/fact-tank/2018/06/21/key-findings-on-the-global-rise-in-religious-restrictions/>

greater mingling of state and religion premised on the belief that living with diversity required something more than granting the same basic rights to all citizens.

When it comes to freedom of religion, there is a striking contrast between how freedom of worship and practice are conceived and operate between Europe and South and South East Asia. While freedom of worship and practice are often guaranteed in European states, this is a qualified right, in contrast to the absolute right of freedom of conscience. In more secularist countries religion is regarded primarily today as an 'inner life', a 'belief', a private matter and 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. This looks very different in SSEA, where the character of support and recognition is a more embedded feature of governance and religion's place in the public and political spheres. The foundations of freedom of religion can properly be said to be based in the primacy of group autonomy and moral groupism.

In SSEA this difference gives religion a distinct public presence, such as recognition of multiple religious holidays and direct government assistance for public worship, forms of legal pluralism that recognise personal laws of religious communities, and is a characteristic of the historic 'deep diversity' of the region. It also means that the government is more involved in religion and autonomy becomes a blurrier concept. The legal pluralism in India, for example, has meant the Supreme Court applying an 'essential practice' test, with which it interprets religion to determine if the said practice is an essential part of that religion when resolving issues. It also means that the balance of rights is adjudged differently, where group rights can trump individual rights, and this can serve to limit the freedom of religion of groups within communities, such as women or 'minorities within minorities'.

Yet, these settlements and the forms of pluralism and two-way autonomy are being put under strain with regard to current trends. Identities and how these relate to the state are tied and fixed to ethno-religious categories and citizens are religiously differentiated. This becomes extremely problematic when other norms, which strongly reflect aspects of majoritarian nationalism, become increasingly operative and the state comes to closely align with one ethno-religious identity and a sense of 'unity in diversity' becomes eroded, affecting the status and practice of citizenship of minorities. Here the relevance of the distinction between recent trends in this direction, where in India this has occurred at the political, security (including policing) and civil society levels (including the mass media) but has not yet the legal form increasingly evident in Indonesia and Malaysia mainly in the formal sphere, is significant. What will be significant for the governance of religious diversity and for religious minorities in the region is if the current pluralistic nationalism DON-majoritarian nationalism QON balance tips and reverses.

While on the one hand then, pluralistic nationalism can be seen to represent formal mechanisms for the recognition of religious diversity, the ethno-religionisation of identities creates its own forms of restriction as ethno-religious identities become fixed by the state and limited in number. This also has an impact on freedom of conscience, where, grounded in a moral



groupism where one's citizenship and relation to the state is foremost as a member of a group, one's individual beliefs can be misrecognised by one's religious identity being fixed to ethnicity and ethnic community, and where some religions, and non-belief, are not formally recognised and conversion is proscribed. This type of recognition has also not meant that the privilege of the majority against minorities has been curtailed. Rather than some religious minorities in some European states being alienated and marginalised from the state on secular bases, minorities instead face marginalisation from a majority ethno-religious group that is increasingly assertive in the political sphere.

**6.8** Political secularism is then compatible with five of our range of modes for the governance of religious diversity. It is compatible with a weak identification of a state with a particular religion and even a stronger secularist statist mode of public identity. It is not compatible with a strong majoritarian identification with a particular ethno-religious group, however. From the dimensions of political secularism table above, we can point to features for why this is so. Majoritarian nationalism is strongly associated with national identity along ethnic or ethno-religious lines. This in turn has significant affects for freedom of religion (principally practice but conscience to a degree also) and affects how the state does or does not relate to citizens and vice-versa. This contrasts with modes marked by civic forms of identity. Here, nevertheless, we can point to two trends. The first is the stronger, assimilationist neutrality of secularist statism, which can have an equally restrictive pressure on public religion and religious diversity, albeit one that stresses a denuded public sphere and secularist public identity for citizens that affects all religions rather than majoritarian nationalism's promotion of one religion to the exclusion of others. The second is a contrast with, for instance, moderate secularism, where a weak identification with a religious tradition does not necessarily result in exclusionary nationalist identities and state-citizen relations. Often what is important here is balance and emphasis between DONs and QONs.

## 7. Conclusion

The discussions above have suggested the usefulness of disaggregating each mode into its constituent norms as a way of conceptualising state-religion relations and approaches to the governance of religious diversity. In so doing we are able to provide an analytically nuanced reading that points to similarities as well allows us to account for important differences and developing trends.

Freedom of religion is a common phenomenon but we can observe two directions of travel. Parts of Europe are largely moving in the direction of 'levelling up' or at least reducing the gap between the historic religion(s) and the minorities, whereas in other areas this is less secure. In MENA the majority religion is being pushed upwards by the new religio-political actors, and this is also occurring to a lesser extent in Malaysia and in Indonesia; and in India a different kind of majoritarianism has been on the rise. What they have in common is that Muslim actors are key claims-makers and active elements in both, as a majority or as a minority, in

government or outside it, with the exception of India. It is thus Muslim actors who might be the, or one of the, key targets of more restrictive measures (as in parts of Europe and India) or those imposing more restrictive measures (as in MENA, Indonesia and Malaysia).

What the more restrictive pathways alert us to, of whatever stripe and character, is that pro-diversity arrangements are always projects, subject to political contingency and restrictive forces that can tip the balance of norms. One can create formal space for accommodation of diversity, whether of a moderate secularism or pluralistic nationalism for instance, but after that, trust between communities and a common sense of citizenship has to be nurtured assiduously by the government and civil society.

The experiences here show, moreover, that neither the realization of freedom of religion nor accommodation of diversity is by itself enough. Both these ends need to be pursued side-by-side. Instead of seeing them as alternatives from which we must choose, they must be seen as parallel concerns that should co-exist. When diversity is accommodated, the state and community need to ensure that basic right of equality is protected for the vulnerable groups in a community and inter-community conflict is swiftly curbed and dealt with. When basic rights are protected for all individuals, one needs also to ensure that the dominant majority culture does not disadvantage or shrink opportunities for minorities.

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## About the GREASE project

GREASE is an acronym for “Radicalisation, Secularism and the Governance of Religion: Bringing together European and Asian Perspectives” which is the official name of the EU-funded research project that produced this publication.

Involving researchers from Europe, North Africa, the Middle East, Asia and Oceania, GREASE has been investigating how religious diversity is governed in over two dozen 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.

Project Coordinator: Professor Anna Triandafyllidou

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