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Diversities and dynamics in the governance of religion: inter-regional comparative themes

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Diversities and dynamics in the governance of religion: inter-regional comparative themes

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ABSTRACT

Debates and controversies over the governance of religious diversity are important features of the social and political landscape in all five regions covered in this collection. 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 final contribution presents an inter-regional comparative analysis and findings of different modes of state-religion connections between our different regions, following on from the discussions in the individual contributions of the collection focused on intra-regional analyses. Moreover, central to state-religion relations is the idea of political secularism and so we offer a definition of political secularism from which we can compare countries and regions. We assess the idea of political secularism against our typology of modes of governance of religious diversity and explore convergences and divergences between our regions along three conceptual lines: the idea of secularism, the idea of freedom of religion, and the relationship between national identity and religion.

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Introduction

Debates and controversies over the governance of religious diversity are important features of the social and political landscape in countries across the world. To elucidate some of the key challenges and responses, and what these debates look like, the contributions to this collection have focused on selected country cases in five regions: Western Europe and Australia, South and Southeastern Europe, Central Eastern Europe and Russia, MENA, and South and Southeast Asia. They have shown how all these country cases 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. Each of the contributions has sought to identify what might be said at a regional level as well as intra-regionally, and what is shared along with important differences, when it comes to the governance of religious diversity.

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In this final contribution, we take some stock of this and summarise some key features. We also, however, go further and develop an inter-regional comparison based on the separate intra-regional analyses of the contributions. As such, we also address how the core ideas and concepts of political secularism and freedom of religion ‘travel’ between the different regions, not least as the issues of contextualism and travelability have been at the heart of scholarly debates and innovations in studies of secularism and state-religion relations (for example, Bhargava 1998, 2009; Modood 2012, 2019; Burchardt 2020).

This concluding contribution begins with comparative summaries of the separate contributions of this collection. We first outline different paths to secularism between our different regions, based on differing historical trajectories, and which bear on contemporary forms of governance of religious diversity, before outlining contemporary challenges that have emerged from and across our separate regional contributions. The second part of the contribution then turns to our inter-regional comparison and discussion of political secularism and freedoms of religion.

Establishing religion and paths to secularism

Secularism is a contested concept, as we have seen throughout the contributions to this collection. While for some it is the best, or only, way of guaranteeing important freedoms and equalities in diverse societies (especially pronounced in liberal secular societies), for others it is an alien concept, perhaps even a (western) imposition that has limited purchase in non-western contexts. Secularism can be ‘top down’ and statist, or it can 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. What secularism means and what it looks like in terms of state-religion relations is also at issue. 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.

We can point to three ‘pasts’ from which these various countries in the regions have developed, and through which we can trace three broad and distinct paths in relation to secularism. Their formation from these three points of origin into modern nation-states is at the heart of otherwise quite different paths to (or even out of) secularism.

One is a Christian-majority past, which has resulted in separation between church and state (of different characters). Here, a dominant form of Christianity was the main religious tradition followed by the population, notwithstanding religious minorities and diversity, and also closely entwined with government and state apparatus. This is particularly reflected in countries in Western and Southern Europe. The path of secularisation and tolerance of religious diversity in these countries has, on the whole, been a gradual affair, albeit one which has accelerated since the latter half of the twentieth century.

A second is from a colonial past on top of a Hindu- or Muslim-majority past, again diversity notwithstanding. This 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 Southeast Asia and in the MENA region. (Western European countries of course have colonial pasts, but as colonisers rather than colonised, this is rather different.) On the path we can trace here, aspects of secularism were codified by colonial powers, before constitutional

settlements following independence in the latter half of the twentieth century saw debates and struggles over secularism play out between those seeking control over the religious sphere for a particular religion and those seeking pluralistic settlements.

A third is a communist past layered on top of a Christian/Muslim/multi-confessional imperial (Austro-Hungarian/Ottoman/Russian) past. The path of secularism in countries coming out of this past saw a staunchly atheistic secularism initially forced, before the fall of communism 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. The different paths sketched here have all set the contexts for diverse contemporary challenges to the governance of religious diversity across the regions. Nevertheless, whilst taking account of the importance of historical context, we have been guided by Modood and Thompson's (2018) 'iterative contextualism' to avoid an overly deterministic path dependency, and to assess how ideas of secularism and freedom of religion 'travel'. The following section outlines the main contemporary challenges to and for the governance of religious diversity in each region.

Contemporary challenges

Western Europe and Australia

In Western Europe and Australia we focused on the cases of Belgium, France, Germany, and the UK, along with Australia (which shares many key characteristics as a result of its history as a British penal colony). 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 (violent) radicalisation. There have been high-profile legal cases involving Christians, particularly around sexuality and Christian symbols in public buildings. Yet, the issue of public religion in Western Europe has largely been a result of extra-Christian religious diversity that developed in the region following the end of the Second World War. Accommodations and exemptions have been claimed, at times made, at times refused or revoked for certain aspects of dress, funeral practices, religious buildings, ritual slaughter, and educational provision, for instance. 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. Nevertheless, 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 liberal society, especially around issues of gender equality and sexuality. This has produced, 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.

The issue of freedom of religion has thus become a significant debate. Freedom of religion as (privatised) freedom of conscience remains assured, but beyond this there are important distinctions, the clearest being between on the one hand, a more multiculturalist and moderate secularism for most of the region, and on the other

hand, the assimilationist secularist statism of France. Across both of these, pressures towards reassertions of 'neutrality' and liberal secularism have increased, yet to different extents, with different intensities, and with different legal and policy outcomes.

Southern and Southeastern Europe

Here we focused on the country cases of Italy, Spain, Greece, Bosnia and Herzegovina (BiH), Albania, and Bulgaria. A key issue in these countries is the relation between national identity and religion, which can provide a barrier to inclusion of diversity. Overall, in this region moderate secularism is clearly evident. Yet, in contrast to some of our Western European cases, this is balanced much more strongly by forms of majoritarian nationalism and sometimes by liberal neutralism, an implication of which is that there is less institutional accommodation of diversity.

Despite moves to open up to diversity in recent decades, contemporary challenges revolve around the inclusion of long-standing religious minorities. BiH is probably the most acute case as ethnic and religious identities are fused; the divisions created during the war (1992–1995) 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 state maintains a tight collaboration with major religious denominations and the Albanian Muslim Community (*Komuniteti Mysliman i Shqipërisë*) 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 of the Republic of Bulgaria 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, more recent migrant populations have also given rise to debates and challenges. 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 recognised by the Italian State continued to widen in the 2000s but left out religions perceived to be at odds with Italian law, namely Islam 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 and so-called 'refugee crisis' (2014–2016). Spain here might be seen to diverge from the other two southern countries, although in the face of a similar economic crisis and immigration concerns we should be cautious of underestimating the risk of a rise of far-right forces or of anti-immigrant rhetoric.

Central Eastern Europe and Russia

Throughout Central Eastern Europe, the first decade after the collapse of communist rule witnessed very liberal regimes of governance of religion and the securing of religious freedoms, and led to a large number of groups seeking recognition as faith communities. Yet, there are questions of equality between groups. Alarmed by these large numbers, the governments in the region gradually introduced tougher regulations on the registration and operation of religious organisations, and increasingly reoriented policies to ensure the state's control over religion.

Looking at the cases of Lithuania, Slovakia, Hungary, and Russia, we can see how 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 in the face of more assertive majoritarian nationalisms. 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 2014–2016 refugee crisis. There has been a clear turn in the political elite towards populist nationalism emphasising Christian heritage. This is not restricted to fringe political parties, but also mainstream parties have started resorting to a rhetoric full of religious symbolism and the sense of a clash of civilisations understood almost exclusively in religious terms. As a corollary to this, the 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. Whereas this trend and challenge can be seen in Russia, Hungary, and Slovakia, Lithuania represents a more moderate case, where characteristics of liberal neutralism are more pronounced than in the other country cases in this region.

MENA

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, and debates between secularists and political Islamists have often been fraught. These concerns have been exacerbated by violent radicalisation, which has become a significant challenge across the region. By focusing on the country cases of Egypt, Tunisia, Morocco, and Turkey we see how some 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 modernisation projects in the region prior to the 1970s were originally framed as an attempt to build what leaders considered an enlightened version of Islam. 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. Religious political parties have ended up being in power, totally or partially, in the four countries. Prevailing in the region are forms of majoritarian nationalism where Islam is the dominant religion, and where minorities, including Muslim minorities not fitting with state norms, are highly circumscribed even allowing for features such as personal law.

The case of Lebanon, however, differs from our other country cases in the region. Here 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 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.

South and Southeast Asia

In South and Southeast Asia we focused on the country cases of India, Indonesia, and Malaysia. Despite settlements in recognition of deep diversity and the need to promote a sense of national unity as pluralistic, since these countries gained independence these settlements have been tested. Trends in all three countries show a rise in more exclusive majoritarian nationalisms that are tied to the dominant religious group, with serious implications for minority faiths as well as for ideas of freedom of religion and the place and role of religion in society and politics. This trend represents a major political and state challenge to deep diversity and ideas of secularism.

In Malaysia and Indonesia, the most striking development has been the emergence of politically radical and fundamentalist Islamic movements, giving way to a majoritarian turn that has created issues of discriminatory treatment of minority groups including non-mainstream Muslim groups (Chin 2022; Tanasaldy 2022). In this sense we can see trends of what has been called ‘Islamisation’ and ‘Sharia-isation’ of the state and legal apparatuses, trends which seek to strengthen the idea that the state is Islamic and that forms of governance should reflect this. In India, majoritarian pressures come from the Hindu majority, facilitated and encouraged by the ruling Bharatiya Janata Party (BJP). These pressures have particularly targeted India’s Muslim population, who are subject to increasingly restrictive and aggressive measures. The exemptions and accommodations secured following independence, which aimed to provide institutional freedoms and the right of India’s different religious communities to live according to systems of personal law, are especially under pressure.

Regional summary

Taking the contributions together, the challenges across the regions are diverse and contextually dependent on domestic and wider events steeped in historical relations. Yet despite these considerable differences, there are a number of shared themes. Old and new populations continue to pose challenges, leading to debates and controversies about privilege, equality, and inclusions. Issues of nation, state, and identity loom large and give rise to difficulties in inclusion, even when concerted efforts are made towards this challenge. When they are not, there are sharp exclusions through forms of majoritarianism (and majoritarian backlash) and even violence; and these exclusionary forces might be state-backed and/or from sub-state groups. Moreover, we do see that overall, and notwithstanding exceptions, our regional configurations do make sense. There is enough commonality within each, which also distinguishes each region from others, that it is meaningful to talk about these regions as regions. We can and should point to exceptions (Lebanon, Lithuania, France, BiH, for example), but these do not serve to disturb this claim. This will be further elaborated below.

Table 1 presents a visual summary of the findings in the contributions. It returns to the table of modes set out in the first contribution to this collection, mapping our regions and

Table 1. Comparison of modes and norms by region.

Majoritarian Nationalism	Secularist Statism	Liberal Neutralism	Moderate Secularism	Pluralistic Nationalism
Western Europe and Australia				
	France ↑		Belgium ↑	
			Germany ↑	
			UK ↑	(UK)
			Australia ↑	
Southern and Southeastern Europe				
Greece ↑		(Greece)	(Greece)	
(Italy)		Italy	Italy ↑	
(Spain)		Spain	Spain ↑	
(BiH) ↑		BiH	BiH	
Bulgaria ↑		(Bulgaria)	Bulgaria	
Central Eastern Europe and Russia				
Hungary ↑				
(Lithuania)		Lithuania ↑		(Lithuania)
Slovakia ↑	(Slovakia)			
Russia ↑	Russia			
	(Albania) ↑	Albania	Albania	
MENA				
(Lebanon) ↑				Lebanon
Turkey ↑				
Egypt ↑				(Egypt)
Morocco ↑				
Tunisia ↑				
South and Southeast Asia				
(India) ↑				India
(Indonesia) ↑				Indonesia
(Malaysia) ↑				Malaysia

countries against this framework and also indicating movement in modes and norms of governance. The *dominant operative norms* are shown for each country, with significant *qualifying operative norms* shown in brackets (where not already covered). The 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.

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 non-causal but provide us with tools to describe and explain, and to account for patterns and shifts. Things can move in different directions, and we are able to capture this through tracing convergences and divergences. The ‘moving parts’ aspect of our framework also lends itself to thick description of cases whilst avoiding the trap of path dependency, and is an important aspect of a more dynamic ‘iterative contextualism’.

Convergence and divergence: inter-regional

Having briefly summarised the main findings from the contributions, we now address inter-regional points of convergence and divergence. The discussion here will draw out in

more detail some of what can be seen in [Table 1](#) and present a comparative conceptual analysis of key terms and how they travel between our regions.

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

- (1) Countries in all five regions have 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 is professed in all cases but comes to look quite different in different contexts and under different modes. A significant aspect of this relates to the dimensions of freedom of conscience and freedom of 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, and practice can reflect 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 in diversity-restricting ways. Indeed, one of the analytical strengths of our approach is that it brings out, as in [Table 1](#), how important nationalism is in some states; in MENA this particularly means majoritarian nationalism, and with South and Southeast Asia it currently means a movement in that direction from an older pluralistic nationalism sustained by an historic deep diversity. This is a feature of contemporary dynamics missing from political theory discussions of secularism.

In the first contribution in this collection we drew attention to, first, a minimalist definition of political secularism, where the core idea of political secularism is that 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. This minimalist definition represents a one-way type of autonomy, and so we then added that we also need to recognise that secularism can additionally be supportive of autonomy of organised religion and freedom of religion, which 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 (Modood 2012).

So here we have a minimalist definition of political secularism, premised on one-way autonomy, 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 means', where measures to achieve political secularism, such as church-state separation, become ends in themselves. This allows us to shift from foregrounding the idea of separation and its extent to instead foregrounding connections and their character. 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. Thus, rather than focusing on whether connections are 'properly' secular, we can explore how they affect the governance of religious diversity and the inclusion or accommodation of religion in the public and political spheres.

However, here we want to take this thinking about political secularism further for the purposes of our comparative approach. The different modes of governance of religious diversity we identify relate the different expressions that political secularism takes in different contexts. From the above, therefore, we can begin to indicate what we refer to as *dimensions of secularism*: namely, freedom of religion (as conscience and worship), national identity in relation to religion, how a state relates to its citizens (individuals or groups), and autonomy (one or two way). We can begin now to outline these dimensions and characteristics of political secularism and SRCs in more detail, and to characterise our modes of governance of religious diversity against them in a way that allows us to assess how the core notions of political secularism and freedom of religion travel, compare, and contrast between our cases. Table 2 presents the dimensions outlined above against our modes of governance from Table 1.

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 contrast between them. It also recaps some of the principal intra-regional dynamics as it relates its discussion to Table 2. It is worth highlighting at this stage that this is a necessarily limited number of regions and country cases within them. The comparative discussion and analysis we present here could be usefully expanded to include further cases, and indeed we would welcome its wider application, and the comparative implications of doing so. This, however, would not serve to bring the approach itself into question. As it stands, we argue that our approach is useful in providing observations and insights into the cases we discuss. This general point of analytic utility and understanding, we suggest, could only expand and develop as did the number of cases considered by working with it.

Inter-regional comparative discussion

For the purposes of our comparative analysis, we can start in Western Europe and Australia. All our country cases in this region fit the minimalist definition of political secularism. The UK, Belgium, Germany, and Australia also fit our minimalist+ definition, while the balance in France tips towards a more one-way autonomy. 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

Table 2. Dimensions of political secularism and modes of governance.

Modes → Dimensions ↓	Majoritarian Nationalism	Secularist Statism	Liberal Neutrality	Moderate Secularism	Pluralistic Nationalism
National Identity	ethno-religious	secular- national	'neutral'	'neutral' or 'weak multi'	ethno-religious or 'strong multi'
Mutual autonomy	Low	Low	Medium	Medium	High
Freedom of religion (conscience)	Low	High	High	High	Medium
Freedom of religion (practice)	Low	Low	Medium	Medium	High
State's relation to citizens	ethno-religious	Individual	Individual	Individual (+ ethnic/ ethno-religious)	Ethnic/ethno-religious (+ individual)

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. We might say, nevertheless, 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. This is not just a feature of the French state but regarded as central to the country, France; for some it is what it means to live in France and to be French.

They also all have important connections between state and religion, even in France there is no 'absolute separation'. The key difference here is in the quality of these connections; the balance between religion treated as a public good or danger and between state control of or autonomy for religions. 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 leans towards a uniform conception of identity and assimilation.

A further point of difference relates to freedom of religion, where this is based in moral individualism and freedom of conscience, but where in the case of moderate secularism this is the basis for public religion and for France it is individualised and confined to the private sphere to a greater degree. As a result, while all states guarantee freedom of conscience as an absolute right, freedom to practise is a qualified right, and qualified in different ways.

Starting with Western Europe and Australia already gives us differing perspectives on secularism, split by the balance of 'autonomies' and thereby levels of control/regulation, and also by the form that freedom to practise takes and thus the extent of the public presence of religion, while freedom of conscience is significant in all the states. 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.

Turning to Southeastern Europe, again the country cases fit our minimalist definition of political secularism. Here, however, the ties between nation and religion are stronger, state regulation is higher, and the types of recognition associated with moderate secularism are lower. Where moderate secularism does form the DONs, these are qualified by QONs that distinguish the governance of religious diversity. Freedom of religion is 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, the mutual autonomy of state-religion relations and accommodative character of SRCs is weaker. To differing degrees, features of majoritarian nationalism qualify and curtail the public character of religious diversity. This is perhaps weaker in Spain and Italy, and Albania has a comparatively stronger presence of secularist statism and the links between nation and religion are weaker. In all three cases, SRCs are mediated by features of moderate secularism, and thereby of public religious diversity. In Bulgaria and Greece majoritarian nationalism forms significant dominant norms, with the Orthodox churches and national identity more closely linked. BiH, as something of an outlier in its more multi-confessional arrangement is, nevertheless, perhaps also characterised as akin to a form of sub-state majoritarian nationalism, where these features operate within differently dominant confessional regions rather than in one overarching state-wide way. A further feature in the region, 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.

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 majoritarian nationalism.

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 is more strongly grounded in liberal neutralism with features of moderate secularism. Elsewhere, however, majoritarian nationalism, with a close identification between state and dominant church, is an increasingly strong feature of SRCs. One aspect of this that stands out in the region is 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 the region and is consistent with moderate secularism (see also for example Lægaard 2012; on Denmark; Thompson and Modood 2022 on Finland and Alsace-Lorraine); we might in fact say that tiered systems within a supposed neutralism are the status quo of SRCs across Europe. Nevertheless, the types of privileging prominent in, for example, Slovakia, Hungary, and Russia are marked by majoritarian nationalism in producing close ties between the state and the dominant form of Christianity. This type of privileging, moreover, works in practice to deprivilege minorities, older and newer, including Christian minority denominations. 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 the *use* of religion by political elites without identification. A more straightforward utilisation would be more compatible with secularist statism 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 there are, at times, severe restrictions placed on non-recognised religions or denominations which – especially if critical of the government – face high levels of interference and control; we might think of Jehovah's Witnesses banned as an extremist group in Russia or the Methodists in Hungary. 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 but by no means exclusively affects 'new' religions, that is those of more recent populations, and is reminiscent of how NRMs were targeted in some states in Western Europe in the 1980s and 1990s (see Richardson 2004). A further comparative point we might make here, although this time looking towards Southeast Asia (see below), is that following regime change an initial period of more openness to diversity came in before a more majoritarian turn, even if in postcommunist countries it was short lived.

In thinking about the picture of secularism in Europe, we can begin to see certain patterns. All countries meet the minimalist 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. 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, in other areas of the continent, connections have intensified in identitarian ways. As some 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. In countries 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 – also face the same restrictions. Those country cases that are more characterised by secularist statism, such as France and to perhaps a lesser degree Albania and Slovakia, similarly restrict public roles and have a national identity strongly tied to a secularist ideal where ethnic or religious identities take a back seat, at least in a public sense.

Moving beyond Europe, we can begin to see how these modes and norms compare with other regions. Looking first to the MENA region, it is less certain if the minimal definition of secularism can be applied. 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.

Identitarian majoritarian nationalism grounded in one religion is pronounced. In contrast to the observations made above, here majoritarian nationalism forms the dominant operative norms, which are then qualified in some cases by some limited features of other modes; that is, features of majoritarian nationalism are the qualified rather than the qualifiers. National identity is closely entwined with religious identity such that the state, in different ways and through different instruments, 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 minorities in terms of participation outside of their communities and discrimination remains widespread. 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, yet in practice this is restricted. 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.¹ In Tunisia Islam is the religion of the state with some recognition for Christian and Jewish minorities, and the state, as the 'guardian of religion', exerts high levels of control. Lebanon is an exception in formally recognising a multi-confessional polity, and in this reflects aspects of the pluralistic nationalism found in Southeast Asia. This, however, entrenches sectarian lines between groups and sectarian identities. In this it shares features with BiH of sub-state majoritarianism, and would perhaps make for an interesting comparison between the two in its own right.

Finally, we turn to South and Southeast 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, with religion featuring much more prominently and in much more entangled ways with politics, legal codes, and statecraft. These are also expressed through the national philosophies of Indonesia and Malaysia, with the unity of God one of the five principles of *Pancasila* in Indonesia, and the *Rukun Negara*, which calls for all citizens to be sensitive to and respectful of the concerns of other religious communities in Malaysia.

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 Southeast Asia. While freedom of worship and practice (in public) 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 ascension. This looks very different in South and Southeast Asia, 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, and what Hefner has referred to as 'institutional religious freedom' (Hefner 2021).

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 of tension between individual and group rights. 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' (Eisenberg and Spinner-Halev 2005).

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. In these cases, as with our Central Eastern Europe cases, an initial period of greater openness and accommodation following independence has been eroded by majoritarian pushes.

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. When one's citizenship or political status relies on group membership, the resulting moral groupism can lead to individual beliefs being misrecognised or to some belief perspectives or life decisions (such as religious conversion) being formally proscribed. This type of recognition has also not curtailed the privilege of the majority against minorities. 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.

Concluding remarks

Political secularism as we have presented it is then compatible with a weak identification of a state with a particular religion and even a stronger secularist statist mode of public identity. It is less compatible with a strong majoritarian identification with a particular ethno-religious group, however; where this is strongly associated with national identity along ethnic or ethno-religious lines to the exclusion of minorities. This in turn significantly impacts on 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 contrast is with, for instance, moderate secularism, where a weak identification with a religious tradition does not necessarily result in exclusionary nationalist identities (except for peripheral far-right currents) and state-citizen relations.

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 as allowing us to account for important differences and developing trends, and what is often significant is the balance, interaction, and direction of travel between dominant norms (DONs) and qualifying norms (QONs).

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, albeit unevenly between and within country cases. 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 (Dhanda 2022; Sikka 2022).

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 realisation 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 coexist. When diversity is accommodated, the state and community need to ensure that the 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. For these reasons, we have developed analytical frameworks able to account for such dynamics, and have argued that this is of great significance for understanding the governance of religious diversity and for addressing the challenges that it gives rise to.

Note

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

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