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Freedom of Religion and the Accommodation of Religious Diversity: Multiculturalising Secularism

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Abstract: The classical liberal concern for freedom of religion today intersects with concerns of equality and respect for minorities, of what might be loosely termed ‘multiculturalism’. When these minorities were primarily understood in terms of ethno-racial identities, multiculturalism and freedom of religion were seen at that time as quite separate policy and legal fields. As ethno-religious identities have become central to multiculturalism (and to rejections of multiculturalism), specifically in Western Europe in relation to its growing Muslim settlements, not only have the two fields intersected, new approaches to religion and equality have emerged. We consider the relationship between freedom of religion and ethno-religious equality, or alternatively, religion as faith or conscience and religion as group identity. We argue that the normative challenges raised by multicultural equality and integration cannot be met by individualist understandings of religion and freedom, by the idea of state neutrality, nor by laicist understandings of citizenship and equality. Hence, a re-thinking of the place of religion in public life and of religion as a public good and a re-configuring of political secularism in the context of religious diversity is necessary. We explore a number of pro-diversity approaches that suggest what a respectful and inclusive egalitarian governance of religious diversity might look like, and consider what might be usefully learnt from other countries, as Europe struggles with a deeper diversity than it has known for a long time. The moderate secularism that has historically evolved in Western Europe is potentially accommodative of religious diversity, just as it came to be of Christian churches, but it has to be ‘multiculturalised’.

Keywords: multiculturalism; secularism; religious diversity; accommodation; ethno-religious minorities; Western Europe



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1. Introduction

From the latter part of the 20th century the relation between freedom of religion and the accommodation of religious diversity has appeared at the forefront of political and scholarly debates in Western Europe, a result of the development of an extra-Christian religious diversity that the region had not known since the Reconquista stemming from post WWII migration flows. A significant proportion of these populations were Muslim, albeit from diverse places, and it was with a focus on Islam and Muslims that debates and controversies centred on religious diversity came to rest. Importantly, it was claims making by religious minorities on secular states, emanating from a new context of de facto multiculturalism, that reawakened serious consideration of the balance between freedom of religion and religious accommodations. In this vein, 1989, with the Rushdie Affair in the UK and *l'affaire du foulard* in France was a significant year for issues of religious diversity being brought to the foreground (Modood 2019). Claims for accommodations on grounds of religion have been made on a variety of issues across Western European countries, including those concerning religious signs and symbols (such as crucifixes and headscarves), buildings (notably mosques and minarets), noise (the *adhan*, for example), religious holidays (which Christians enjoy by historical inheritance), religious education (in the form of faith schools), funeral rites, and religious law.

This forces new thinking, not only about questions of social integration but also about the role of religion in relation to national narratives as well as the state and citizenship. Accordingly, the fundamental issue of political secularism that many thought had long been settled has re-emerged with new vitality and controversy, especially as it articulates with questions of tolerance, recognition, governance and national identity. Debates about the proper place of religion in secular societies and the mode of liberal secularism have ensued. The responses can be grouped into three broad trends. The first is a staunch restatement of liberal secularism. The second is an accommodationist rethinking of liberalism within its own terms. The third group represents challenges to liberal secularism.

The first of these is exemplified by its French Republican variant with an assertive brand of *laïcité*. It represents a strong disavowal of the necessity of accommodations for religious diversity in the public sphere, and carries an emphasis on a conception of freedom from religion. Freedom of religion, in this approach, is relegated to the private sphere and individual conscience, with outward manifestations of religious belief, in clothing for example, highly regulated (Tourkochoriti 2012).

By contrast, the second two groups can be thought of as approaches that are pro-diversity. It is these that this article will concentrate on. The first section below will discuss liberal accommodationist approaches and argue that conceptions of equality and diversity found here are ultimately too restricted. The second section will then go on to consider approaches that challenge the bases of liberalism, primarily emanating from outside of Europe. A final section will then consider a particular mode, that of *multiculturalised secularism* as an appropriate normative response in Europe.

2. Liberal Accommodationist Secularism

A number of liberal theorists came to review their arguments and the charge that secularist domination was an inherent feature of liberalism, the best known being the revisionary accommodations undertaken by Rawls and Habermas. In this section, however, the work of two important thinkers who have offered more recent conceptualisations of a pro-religious diversity liberalism are considered: the ‘open secularism’ of Charles Taylor (with collaborators) and the ‘minimal secularism’ of Cécile Laborde. Both share individualist understandings and conceptualisations of secularism along with the principles of state-religion separation and state neutrality as bases for ensuring the freedom of religion, and which, this article will argue, subsequently place certain limitations on the accommodation of religious diversity and inclusion of ethno-religious groups.

2.1. Open Secularism

Charles Taylor’s seminal essay *The Politics of Recognition* (Taylor 1994) is something of a foundational text for modes of multiculturalism that are critical of some of liberalism’s bases. Yet, in more recent writings, and particularly under the concept of ‘open secularism’, Taylor’s thought appears to have shifted with regard to the kind of recognition he previously advocated. ‘Open secularism’, also rendered as a ‘liberal pluralist secularism’ (Bouchard and Taylor 2008; Maclure and Taylor 2011), maintains the idea of the state’s neutrality in relation to religious diversity.

Four principles of secularism are balanced: (1) the moral equality of persons; (2) freedom of conscience and religion; (3) the separation of Church and State; and (4) state neutrality in respect of religious and deep-seated secular convictions. The balance distinguishes between (1) and (2), which form the “essential outcomes of secularism” or the *ends* of secularism, and (3) and (4), which are the *means* of secularism, the institutional structures for achieving (1) and (2) (Bouchard and Taylor 2008; Maclure and Taylor 2011). Although, therefore, neutrality is not posited as an essential outcome for secularism, it is posited as a structural necessity for achieving the essential outcome of moral individualism. This neutrality differs from a more assertive republican secularism, as found in assertive French *laïcité*, for instance, through its focus on a state’s or state employees’ *acts* (in the performance of their duties) rather than on the physical appearance of its employees or

users. In the republican conception, it is argued, the means and ends are too often confused and conflated in a ‘fetishism of means’ such that too much importance is attached to the means (Maclure and Taylor 2011).

Here, then, open secularism, through its important distinction between ends and means, is presented as a mode of secularism that is more relaxed about state neutrality and separation. Yet, despite, or perhaps because of, this shift, inconsistencies creep in on how important neutrality and separation are. We read also, for example, that open secularism “recognizes that the state *needs* to be neutral” and “must not favour any religion or any comprehensive secular view” (Maclure and Taylor 2011, p. 58), strongly affirming the necessity of state neutrality and separation. It seems then that despite a more historically contextualised and sensitive critique of the principles of neutrality and separation, they remain ambivalent yard sticks for assessing the proper role of the state in relation to religion.

In relation to the first two features, this mode rests on the moral equality of persons and freedom of conscience, the approach is rather too subjectivised and individualized. Whilst recognising the significance of the individual spiritual dimension so central and important for many religious adherents, this admirable appreciation of the profound moral character of religious individuals is not extended to groups which sustain this moral character. This appears to be a result of the concern to preserve the non-competence of the state and circumvent majority opinion within a religious group. Yet, it is not clear that the desire to maintain state neutrality in relation to religious conscience can be achieved. Claims of conscience—for instance, that one’s religion requires time off from work—requires the courts to adjudicate on the sincerity of a religious conviction of an individual and thus unavoidably rule on what counts as sincerity of belief based on some interpretive standards. This is not to suggest that the moral equality of persons and freedom of conscience are not and should not be important constraints on the governance of religious diversity, but to note that this rendering of freedom of religion sees a non-individualistic approach as constraining rather than constituting religious freedoms. It is here where the emphasis falls more squarely on the liberty of sovereign individuals within a state struggling to be neutral, weighting greater caution over protection *from* rather than *of* groups.

In a further point of ambiguity Bouchard and Taylor tell us that “open secularism resembles what Milot calls the secularism of recognition. According to Milot, secularism of recognition ‘is undoubtedly, among the different ways of instituting secularism, the most socially, ethically and politically demanding’” (Bouchard and Taylor 2008, p. 141). Yet, while open secularism may be more demanding than a republican secularism, it is in fact less demanding than a politics of recognition. The principle of separation and neutrality of state actors of open secularism falls short of this kind of recognition in which the state is not identity-blind but seeks to affirm group identities, especially where those identities have been distorted, marginalised or subordinated (Taylor 1994). State-religion connexions in open secularism, however, are judged primarily in terms of a moral individualism ignoring their role in ‘misrecognition’ and, more positively, in developing the public good in material or symbolic terms, for example, through contributing to a sense of national identity.

2.2. Minimal Secularism and Restricted Neutrality

The conceptualisation of ‘open secularism’ can be contrasted with another liberal view, that of Laborde’s ‘minimal secularism’. A full, technical account of Laborde’s theory is beyond the scope of this section, which will limit the discussion to the emergent features of state neutrality and recognition.

For Laborde, the state is not neutral on the good, it is not ‘strictly antiperfectionist’, and it is the state’s place to “define what constitutes *harmful* behaviour”, regulate spiritual activities, and define semiotic meanings of religious symbols (Laborde 2017, p. 166). This marks a shift from her earlier presentation of a critical republicanism in which she endorsed the separationism of *laïcité*. In this earlier mode, provisos notwithstanding, Laborde supported the removal of difference from the public sphere as the best way to promote respect and tolerance on the basis that “a radical strategy of *de-ethnicization*” of the

public sphere as well as of Muslim identity is the only way of fairly integrating minorities as equal citizens, formed out of the concern to guard against an entrenchment of groups as unconducive to “trans-group solidarity” (Laborde 2008, pp. 230, 238, 234).

Laborde’s position has shifted, or at least become more hedged, in recent work. While she sees full establishment, for example, as in breach of liberal principles, she now sees (or at least explains) that modest establishment, providing *adequate* protection of religious freedoms and some public funding and state aid to religious groups is compatible with liberalism (Laborde 2013, 2017). It is thus that she develops a *minimal* secularism and a *restricted* neutrality based on three normative principles of minimal secularism: (1) generally accessible reasons at the level of the state, (2) that the state does not symbolically endorse a social identity that is a marker of vulnerability and domination, and (3) that practices that relate to comprehensive ethics may not be forced on individuals (Laborde 2017, pp. 120, 137, 144). Laborde articulates two ideal types of liberal state, (progressive) *Secularia*, which resembles France, and (conservative) *Divinitia*, which resembles the UK. Yet, while she permits that *Divinitia* is consistent with liberalism, her preference is for *Secularia* (Laborde 2017, p. 192, chp. 5 and 6). She maintains that symbolic establishment “risks alienating members of minorities in ways that infringe on their equal civic status” such that “non-adherents are rejected outside the imagined community” (Laborde 2017, pp. 125–37). For Laborde, the issue “turns on how a reasonable (and reasonably well-informed) member of a community would understand the actions of public officials who undertake to display material that has religious content” (Laborde 2017, p. 85).

This invocation of the ‘reasonable person’ to guard against minority alienation from the state is an important aspect to Laborde’s position and appeals to a form of neutrality stem in large measure from this. She further argues, for instance, “all citizens should be able to not to feel alienated by their political institutions in light of their deepest beliefs, and that institutions should consequently be framed with that aim in mind” (Laborde 2013, p. 84). The reference to the reasonable person being reasonably informed in determining the issue of alienation, however, suggests that some empirical data needs to be taken into account, and presumably it would be reasonable that this should include the view of Muslims (and others). For instance, many people think that the *niqab* and/or the *hijab* is oppressive of women and so state action to ban them in public places is liberating and not alienating, and this is the position the French state has taken. However, this would not be a reasonable view if it did not seek evidence from Muslim women. Indeed, given that they are the object of the analysis and that state action is being called for on their behalf, it would be reasonable to give special weight to the perspective of Muslim women, rather than to the reasonable person. This is a reason why minority perspectives cannot be assumed to be understood by simply engaging in a ‘reasonable person’ exercise and without allowing the minority to speak for themselves. The risk is that a position and policies which overly emphasise freedom of religion understood primarily as individual conscience based on an abstracted ‘reasonable person’ can come to privilege the majority over and against a minority, without the minority position having been sufficiently considered in the decision-making. It seems reasonable to expect that this is likely more alienating than the need for neutrality it is aimed at achieving (Modood 2019, pp. 12–13; Modood and Thompson 2021).

Furthermore, put to the empirical test this alienation argument is found to be questionable. If we look at the relevant data from the well documented case of Britain, for example, the evidence is of a strong sense of British identification and national pride amongst Muslims in Britain. An analysis of two Citizenship Surveys has concluded, “We find no evidence that Muslims or people of Pakistani heritage were in general less attached to Britain than were other religions or ethnic groups” (Heath and Roberts 2008). This has in fact been the finding of many surveys, with one concluding that “overall British Muslims are more likely to be both patriotic and optimistic about Britain than are the white British community” (Wind-Cowie and Gregory 2011; BBC 2015).

Moreover, that, for example, Muslims in the UK feel alienated because of the position of the Church of England is also contradicted. There is no record of any criticism by a

Muslim group against the Anglican Church's establishment. On the other hand, many Muslims complain that Britain is too unreligious and anti-religious, too hedonistic, too consumerist, too materialist, and so on. Muslims protest far more vigorously about secularist bans on modest female clothing, such as the headscarf and the face veil, than they do about 'establishment' or Christian privileges. British Muslims do include many vociferous political groups, and they have mounted many arguments, not to mention campaigns, in relation to socio-economic deprivation, religious discrimination, incitement to religious hatred, various foreign policies, antiterrorist policies, and so on (Modood 2010). So, there is an extent to which Muslims in Britain do seem to feel excluded and alienated by certain aspects of British society, and indeed European society. Yet, Muslims along with other religious minorities appreciate that establishment is a recognition by the state of the public and national significance of religion and thus a possible resource against alienation on religious grounds (Modood 1997; Rothschild 1997; Singh 1997). That recognition, furthermore, holds out the prospect of extending state-religion connections to minorities. Indeed, the established Church has proved a valuable inter-faith ally for minority faiths in gaining a foothold in the public sphere, providing institutional access to make claims for recognition and for cooperation between the state and religious groups (Fetzer and Soper 2005). Disestablishment in the name of neutrality, by contrast, would foreclose that prospect without conferring any benefits to religious minorities. That calls for disestablishment come overwhelmingly from secularists rather than from minority faith groups is telling in this regard.

Laborde attempts to circumvent the empirical test by contending that "what matters is not what governments intend to communicate, nor how citizens subjectively perceive it but, rather, whether governmental messages express objectively appropriate attitudes toward people" (Laborde 2017, p. 135). Thus, "the wrong of official endorsement of the majority religion is that it makes their minority status relevant—negatively—to their civic status" (Laborde 2017, p. 137). Yet, this presumes that the negative status of minority religious identity is sustained by symbolic establishment and not, for example, by racialization, cultural 'othering', or muscular forms of liberal secularism, which are far more likely to be highlighted as alienating by religious minorities themselves (Modood and Thompson 2021).¹ Religious minorities such as Muslims are more likely to be alienated by the kind of secular state that Laborde argues for, one which she thinks is unavoidably more suited to non-religious citizens than religious citizens (Laborde 2008, p. 88).

In relation to diversity and freedom of religion, then, we should not assume without empirical inquiry that establishment or existing state-religion connexions are a barrier to multi-faith equality and should be dismantled. It may be the case that what is best is not dismantling but the inclusion of minorities into existing and new arrangements. This is a very important argument that bears on political theory and its relationship with empirical realities (Modood and Thompson 2021). In fact, it turns out "there is no cross-country empirical data demonstrating that religious minorities in states, democratic or otherwise, that support the majority religion (via various policies) grow resentful of the state or its organs" (Perez et al. 2017, p. 441).

A problem with appeals to neutrality, is that the "state unavoidably promotes certain cultural identities, and thereby disadvantages others" (Kymlicka 1995, p. 108). In this Kymlicka is surely right, although he excludes religion and ethnoreligious groups from 'cultural identities'. The separation of religion and state is not a neutral view about religion; it is a very definite view. Or, to put it another way, if non-separation of religion and the state is reflective of an ethical-cultural perspective—what following Rawls is referred to as 'a conception of the good'—then so is its negation, the separation of religion and politics. To privilege one or more religions relative to other religions or relative to the state support for other features of cultural life—ethnic identities, language, the arts, science, sport and so on—is dependent on a valuation of religion and these other activities; as is the denial of state support relative to these other dimensions of society. In neither case, is the state being neutral about religion relative to the rest. There may be good arguments for separation,

but they describe few contemporary states and to pursue separation is not an ethically neutral position.

These formulations, based on individualist understandings of religion and freedom and state neutrality, prove inadequate to the task of meeting the challenge and demands of ethno-religious equality and provide an insufficient normativity for the governance of religious diversity. The following section turns to consider approaches which do not only reflect western practice and thereby include societies where there has been a deeper and historic religious diversity, and which offer alternative normative thinking.

3. Positive Accommodation, Principled Distance, and Deep Diversity

The approaches brought together here come from theorists considering contexts not limited to the West and share a pro-diversity approach that is critical of the bases of liberal secularism and discourses of neutrality. In contrast to freedom of religion based on freedom of conscience, these modes all advocate freedom of religion through accommodations in institutional, organisational, legal and political structures. The work of Alfred Stepan, Rajeev Bhargava and Gurpreet Mahajan are considered and taken in turn. In the countries discussed by these theorists, responding to the circumstances and challenges of newly independent and religiously heterogeneous states meant quite different “innovative formulas of accommodation” (Stepan 2011, p. 140) and a variety of politics-religion relations necessarily emerged.

3.1. Positive Accommodation

Stepan is best known as characterising the place of religion in the public sphere in liberal democracies in terms of ‘twin tolerations’ (Stepan 2000), he later examined and advocated state-religion arrangements in polities that went beyond liberal modes. He outlines a ‘respect all, positive cooperation, principled distance’ mode with reference to Indonesia, Senegal and India and identifies three features that distinguish it. One feature is respect for minority and majority religions in the public sphere. In Indonesia, for example, based on the doctrine of *Pancasila*, the state recognises the five largest organised religions in addition to the majority religion, Islam, and positively supports and protects them. Stepan points out how to fulfil this recognition the state in fact mandates more holidays for minority religions combined than for the Muslim majority. In Muslim-majority Senegal, likewise, Catholic religious holidays make up a disproportionate share of the state’s compulsory holidays and both Muslim and Catholic faith leaders attend state events (Stepan 2011). These patterns contrast with those of majority privilege in this regard found in Europe. It must be noted, nevertheless, that *Pancasila* has not been without contestation and politicisation and requires being (continuously) made (Hoon 2017). For example, it is objected that it requires all citizens to identify with one of the recognised religions and therefore in its own way limits religious freedom; there is no non-religion option and switching is made extremely difficult. Moreover, one is obliged by the state to have an ‘official’ religious identity and this regulates legal relationships with religious others in society. There is no option of a civil marriage, a Muslim must marry according Muslim law, for instance, again limiting freedom of religion in so far as religious identity is not a *voluntary* identity.

A second feature are forms of policy cooperation (Stepan 2011, p. 131). This promotes the multivocality of religions, which in turn provides scope for religious reasons and religious arguments in public debates on the basis that where, for example, human or citizens’ rights violations are supported by religious arguments from some, these can be responded to and countered effectively by religious reasons and religiously based arguments. Religions and religious reasons are therefore valued as a public good, as a source of that good, and as dialogical partners and shapers in policy.

The third feature is that of principled distance, which Stepan borrows from Bhargava, and is comprised of three characteristics: (1) a disconnection between state and religion at the levels of ends and institutions but not at the levels of law and policy; (2) a differentiated

citizenship; and (3) state interference in religion (where it may actively support or be hostile to different aspects of religion). While state action must be based on secular principles, it can offer more support to disadvantaged religions but also legitimately interfere more with one religion than another if that religion is violating citizens' rights (Bhargava 2009). The main point of contention to point out here is in relation to (1). Bhargava has quite a rigid position on state-religion separation at the levels of ends and institutions in contrast to a more flexible approach to the level of laws/policies. Yet, as the example of establishment discussed above as well as arrangements found in other European countries, such as the corporatism in Germany, suggests, there are substantial state-religion connexions and we should allow for more flexibility at these levels also. This, moreover, is not least as Bhargava insists on a 'contextual secularism', considered in more detail in the following section.

It will also be useful to highlight a principle feature of 'moderate secularism' here. The term is used for an over-arching concept that includes weak establishment in England, a national church in Denmark and state-supported Christian corporatism in Germany (Modood 2019). The point is that the underlying definition of political secularism as "the relative autonomy of politics so that political authority, public reasoning and citizenship does not depend upon shared religious conviction and motivation" (Modood [2007] 2013) "and should not be subordinated to religious authority, religious purposes or religious reasons" (Modood 2017) provides ample scope for state interference in socio-religious practice where this does not contravene basic individual liberties. It therefore has allowed Western European states to appreciate that organised religion can contribute to the public good in relation to say, national identity, schools and collective welfare and have embraced them where such ends are perceived to be furthered.

3.2. Contextual Secularism

Rajeev Bhargava has addressed secularism from the context of India, first in relation to perceived crises symbolised in the Shah Bano case in the mid 1980s and the destruction of the Babri Masjid at Ayodhya in the early 1990s, and then in relation to what he called a crisis of secularism prompted by the challenges brought about by the recent diversification of religious minorities in Western polities. The West, Bhargava contends, "must examine the Indian conception [of secularism] in the hope of learning from it" (Bhargava 2013, p. 82) and, he maintains, needs to shift to a mode based on principled distance. Bhargava contends that the particular trajectory of European moderate secularism not only has maintained a majoritarian (Christian) bias, which is undeniably true but also that as a result, it is "irretrievably flawed". This is specifically based on his assessment that accommodations and institutional adjustments in relation to new religious minorities in Western Europe, especially Muslims is too difficult, and has resulted in the 'alienation' and 'ghettoization' of Muslims (Bhargava 2015). One of the problems for Bhargava is that "European secularism is not secular enough" (Bhargava 2016, p. 178); it is by becoming 'more secular' that European countries can both better appreciate deep religious diversity as well as manage, through negative intervention, socio-religious practices, thereby giving it a more insistent reformist emphasis. For Bhargava it is on these grounds that the Indian mode and a conception of secularism based on principled distance offers an alternative from which the West should learn. One objection to Bhargava's rendering of principled distance, that it is too rigid with regard to state-religion connexions, has already been made. In what follows, the issue of contextuality will be discussed.

In contrast to both those who would seek an alternative to secularism (Madan 1998) as well as those who would universalise a particular mode and understanding of secularism, Bhargava seeks a form of *contextual secularism*, contextual both in the sense of varying from place to place as well as in forms of moral reasoning (Bhargava 2009, p. 106). This point of contextualism is well enough made. Yet, the claim that European countries characterised by moderate secularism need to shift toward a mode based on principled distance borrowed from the Indian context must therefore be an empirically grounded and substantiated claim.

The types of accommodations Bhargava holds are beyond Western European states, such as for religious dress, faith schools, mosque building and so on, are in fact evident, even if inconsistent, as part of evolving compromises and pragmatic accommodations. Moreover, as discussed above in relation to Laborde, the existing state-religion connexions are a help rather than hindrance for minority inclusion. It should be emphasised that the contention with Bhargava's position is not that the issues of support, accommodation and societal intolerance are not important and significant challenges or that they have as yet been adequately met in several areas. There is no sense in which these changes have come about without debate and controversy or in which the increase in religious pluralism has not been a major challenge for western polities; they have been fought for and in large part by minority groups themselves. Nevertheless, that the types of accommodations that Bhargava seems to suggest moderate secularism is unable to bring about are evident empirically undermines the claim that European moderate secularism is 'irretrievably flawed'.

The result is that Bhargava's own insistence on contextual secularism ultimately undermines his insistence on the inadequacy of moderate secularism in a European context and that the 'crisis' that Bhargava insists Europe is facing, and why it must learn from the Indian mode, is overstated. Furthermore, the subsequent and sustained success of the BJP's Hindutva politics and the Indian government's recent citizenship law deliberately discriminating against a particular religious group (Muslims) suggests that a question mark hangs over Indian secularism no less than over any other. Given that he does not discuss how the Indian state has failed to eradicate the high levels of religious violence in India, and failed to protect Muslims from massacres and systematic discrimination, suggestions of one-way learning must be treated with caution (Sutton 2014; Black et al. 2014). This is not just to do with the very recent Hindutva-inspired government discrimination or pogroms against Muslims; some commentators have been talking about a crisis of secularism in India for more than a decade now (Needham and Rajan 2007).

There is then still the charge of 'not being secular enough' in relation to the state's negative interference in socio-religious practices and the protection of those more vulnerable minorities within minorities. Indeed this is, albeit in a different idiom, echoed by an alternative thinker from the perspective of India, Gurpreet Mahajan (discussed further below), who has women particularly in mind.

Ultimately then Bhargava's critique of European arrangements of moderate secularism misfires. Bhargava does not follow his own contextual secularism. If he did, he would have to look at the national/regional empirical evidence and would find moderate secularism exists as a mainstream western conception and practice, and is adapting itself to religious diversity, albeit in varying degrees, and claims about a crisis of secularism and moderate secularism as 'irretrievably flawed' are greatly exaggerated. The best way to proceed is to not give up on contextual secularism in the way that Bhargava does.

3.3. *Deep Diversity*

A further pro-diversity mode also coming out of the Indian context is that described by Gurpreet Mahajan, who identifies an historical process with "a long history of living with religious differences and the absence of a homogeneous public sphere", which has resulted in a deep diversity and far more familiarity with visible and cultural differences (Mahajan 2017, p. 80).² This familiarity in turn has resulted in the development of a religious literacy and competence such that differences do not appear immediately strange or threatening.

Mahajan has been critical of both liberal multicultural positions, such as that of Kymlicka, as well as of moderate forms of secularism. One of the key issues for Mahajan is that of dominant hierarchies within minority groups, which has already been mentioned above. A further relates to the majority culture privileged over and against minorities, and thus is a concern shared with Bhargava. For Mahajan, the conflation of the state with the majority can have an alienation effect on minorities, a situation she notes in relation to

Muslims in Europe (Mahajan 2007). Mahajan links this to the individualist understanding that underpins liberal approaches, which she argues under-appreciate the role of *practice*, which “they consider to be like any other lifestyle preference or set of freely chosen beliefs, ignoring that religious observances are closely tied to a person’s sense of dignity and respect, a constitutive element of their very self, and hence [experienced as] something more than [merely] an infringement of one’s basic freedom [of ‘choice’]” (Mahajan 2015, pp. 76–77).

She points out how an important constitutional freedom with a different emphasis from that in the West arose in India, where Article 25 of the Indian Constitution gave all persons “the right to ‘profess, practise and propagate’ their religion” (Mahajan 2015, p. 43). That practice as well as worship became protected to a much stronger degree than in Western Europe resulted in differentiated legal and policy outcomes for different religious groups and their individual members (Mahajan 2013, p. 84). In fact, the freedom and rights of the individual that this protects is one that is not as separate and distinguishable from the collective rights as it is under liberalism; rather than individual freedom liberating the individual from the group, “individuals enjoyed the liberty to live in accordance with the customs and practices of their community. In fact, the state was expected to ensure that facilities necessary for the exercise of this liberty were provided” (Mahajan 2007, p. 331). Mahajan notes how the Supreme Court, on balance, has tended towards religious rather than individual liberty (Mahajan 2013).

This engendered a quite different role for the state from that under liberalism as it came to adjudicate based on state competence in matters of religion, and more specifically came to apply an ‘essential practice test’ in its deliberations, balancing individual and collective rights (Mahajan 2013, p. 92). Notably, the essential practice test is applied within the horizon of meaning of the religion against which is being adjudicated. In relation to majority privilege Mahajan points out that the state is neither an extension of the majority community nor collapsible into it. It is the lack of majority privilege in state-religion relations that enables such an arrangement, and such an arrangement to function to the satisfaction of the various religious communities (and which presumably is under severe threat, if it has not already expired, in India today).

This approach to deep religious diversity quite starkly contrasts to the liberal approaches outlined above. Moreover, although more sympathetic to some European moderate secularisms, Mahajan argues that moderate secularism may serve as an ‘enabling condition’ that can coexist with a commitment to diversity, yet remains insufficient for accommodating and valuing religious diversity as a result of its lack of capacity for recognising non-liberal religious demands and practices (Mahajan 2017). It is, she argues, a non-liberal form of tolerance that “has structured [India’s] polity and nurtured its multicultural democracy” (Mahajan 2007, pp. 330–31). Indeed, Mahajan in fact eschews the idiom of ‘secularism’, seeing it as unhelpful (Mahajan 2017).³

4. Multiculturalised Secularism

This section responds to the points highlighted in the previous sections through an argument for a multiculturalised secularism (MCSC). This is a thicker conceptualisation than ‘open’ or liberal secularism and also than the extant moderate secularism found within Western Europe. It shares some features and concerns with the deep diversity positions in the previous section but while that is largely contextually grounded in the Indian experience, this one seeks to develop the possibilities in some European contexts.

Freedom of religion for multiculturalised secularism is not just anti-discrimination, the sameness of treatment, and the toleration of ‘difference’, but also a respect for difference aimed at fuller civic and institutional accommodation. This is based in a socio-political conception of identity, captured in the concept *ethno-religious*, rather than restricted to individual conscience or belief. This does not displace or replace the foundational legal position and protection of freedom of conscience or belief and it is entirely consistent with freedom of religion understood on these terms. Rather, the concept ‘ethno-religious’

seeks to add to this individualised conception in order to capture a two-way dynamic. On the one hand, a particular group in society might come to be racialised as ‘other’ and as homogenous, as might be the case for minorities from the perspective of a majority. On the other hand, is how a group (such as Muslims or Jews) might relate to each other as a community in a political sense, to combat Islamophobia or for forms of education to keep alive certain cultural or religious aspects, for instance. Notably, who counts as Muslim or Jewish in this ethno-religious sense is not limited to people who hold a particular belief or practice a faith and will include those for whom ‘Jew’ or ‘Muslim’ is an ethnic or cultural marker even in the absence of any religious meaning attached to it.

In terms of equality, it is not simply about equal rights despite differences, but about equality as the accommodation of difference in the public space, which can be shared with rather than dominated by the majority, based on the premise that the public sphere reflects various norms and the interests of all. This genuine equality requires dropping the pretence of ‘difference blindness’ fundamental to liberal secularism, and allows marginalised minorities to also be visible and explicitly accommodated in the public sphere. It also not only allows for but supports establishment or other corporatist state-religion connexions in so far as these aid this accommodation. Indeed, the established Church of England not only performs functions in the public good but has also been important in the accommodation of minority faiths in Britain in relation to the state. This is also relevant to Mahajan’s further point about accommodating non-liberal practices as these connexions may be in themselves non-liberal, as are recognition of faith schools and what have been called minority legal orders (Malik 2012) such as Jewish Batei Din and sharia councils, which are consistent with multiculturalised secularism.

Nevertheless, although ‘thicker’ than liberal secularism in this regard, MCSC is ‘thinner’ in contrast to the deep diversity approaches of Indonesia, Senegal and India as it is described by Mahajan. Religious identity under MCSC is not a fixed identity ascribed by the state which differentiates between religious groups on its basis of citizenship, as is the case in Indonesia, for instance. This, nevertheless, represents not so much a normative-theoretical difference as much as it reflects that we are talking about different societies. One of the arguments from the Indian perspectives discussed is a strong defence of a contextual secularism, an argument upheld by MCSC. Religion is much more central to the constitution of society, and especially the public sphere, in, for example, contemporary India than in contemporary Britain. As a contextual theory, MCSC assumes the contextual backdrop of liberal democratic constitutionalism whilst, as argued above, ‘thickening’ it. Another way of saying this is that, borrowing from Charles Taylor (Taylor 2007), it is additive rather than subtractive in its approach—it seeks to ‘equalise upward’ in its accommodation and inclusion of ethno-religious minorities rather than ‘equalise down’ through reducing the position of religion in general and the Church of England in particular (Modood 2019).

Multiculturalised secularism then is characterised by its recognition that religion has a public good dimension in civil society and this may be supported by the state if it is judged to assist in bringing out the good. It does not promote the idea of political authority or autonomy in an anti-religious way, rather it allows organised religion and religious motives to play their part in contributing to the public good (Modood 2010). This is a recognition of both how religious identities can form the basis of discrimination where they become negatively ascribed identities as well as how religious identities are closely tied to a person’s sense of dignity, respect and self-identity (Sikka 2021). The form of equality advocated by MCSC will sometimes require enforcing uniformity of treatment and eliminating discrimination against (for example) religious affiliation, and it may also require the recognition of distinctive disadvantages (such as measures to increase the number of women in a legislature) or special needs (such as the provision of halal meat in state schools). Primarily then, this is a matter of institutional and policy measures that directly address these issues rather than of constitutional reform. It is, in this way, a ‘thickening’ of the extant modes of moderate secularism found in Western Europe.

As part of institutional connections with the state, in a number of countries in Europe contracts have been established between the state and faith organisations in which the latter commits to respecting certain values and the laws of the country. While such arrangements are not necessarily or automatically anathema to the kind of equalising upwards being advocated here, the way in which these are sometimes done is. A stark example here is France's recent demands on Muslim organisations to sign a specific charter on republican values, where the emphasis is on state interference and control rather than a mutual dialogue and where these conditions are imposed on out of security concerns when there is no evidenced reason to assume that such measures are necessary, proportionate or effective.

If state neutrality about culture is impossible and 'privileging' certain activities and language(s), historical narratives and perspectives on religion are inevitable, it does not mean that the state has to endorse everything it supports or funds. A multiculturalist recognition of ethno-religious identities does not consist of such endorsement (Modood [2007] 2013). As such it also does not presume a particular set of beliefs or practices, or how these might variously be adapted, interpreted or understood by different groups, are constitutive of a particular religion or group in any given context. It does not fix any identity category and recognises that claims made on the basis of a, for example, Muslim identity vary between those for whom it is important. It is identity recognition as a form of equal citizenship and inclusion but without any strong evaluation or endorsement of any identities or ways of life. In so far as there is an endorsement, it is an endorsement of co-membership, including the identities of the groups endorsed as belonging, not endorsement of beliefs or practices. For example, the Prime Minister attending an iftar, the eating of a meal to break the daily fast in Ramadan, is not endorsing Islam in preference to non-Islam or raising those who fast above those who do not. She is endorsing that Islam is part of Britain (or France, as the case may be), not asking anyone to follow it or uncritically endorsing any and every belief or practice that someone says is Islamic. The impossibility of the neutrality argument, then, comes from multiculturalism and is related to the argument that civic recognition must go beyond non-discrimination or difference-blindness; equal citizenship requires positive inclusivity through identity recognition and accommodation.

It should then be clear that the kind of recognition that is being advocated for—and this applies to the case of a single or multi-faith state-religion connexions—does not require citizens to believe (or not), to practice (or not) in a religion but regards religious identities, no less than other identities, as sources of public value and inclusivity. Moreover, rather than require citizens to treat such identities as nothing to do with their citizenship, it works to bring such identities into a differentialist or multiculturalized citizenship, so that they can see their religious identity, just as their gender or ethnicity, in the shared citizenship. Rather than expunging group identities from citizenship, citizenship accommodates those identities, treating them as if they belong to that citizenship and makes their bearers feel a sense of belonging to that citizenship and through that citizenship. It makes a common home for what otherwise can be dynamos of antagonism and centripetal disintegration.

Finally, multiculturalised secularism as a mode of post-immigration integration is also 'thicker' in a further way: thinking about national culture. It involves not just the reversal of marginalisation but also a remaking of national citizenship, so that all can enjoy a sense of belonging such that there could be a way of being French/British/German, etc., that Jews and Muslims, as well as Catholics and secularists, can possess (Modood [2007] 2013).

The general liberal and civic nationalist approach is to say that diversity requires a 'thinning' of the national culture so that minorities may feel included and do not feel that a thick majoritarian culture is imposed on them. This is also the approach of liberal multicultural nationalists. Will Kymlicka argues that "liberal states exhibit a much thinner conception of national identity. In order to make it possible for people from different ethnocultural backgrounds to become full and equal members of the nation In so far as liberal nation-building involves diffusing a common national culture throughout the territory of the state, it is a very thin form of culture . . ." (Kymlicka 2001, pp. 55–56). Yet, a multiculturalised secularism is not a thinning of moderate secularism, it is a pluralistic

thickening. MCSC is, therefore, a thick-pluralistic type of moderate secularism. This type of multiculturalism adds to the national culture by not disestablishing the national church but bringing other faiths into relationship with it; by not taking religion out of schools but ensuring that commonality and diversity are both accommodated; by not emphasising a particular national religious identity that sees minority faiths as ‘other’ but developing an inclusive multicultural and multi-faith national identity. In general, a multicultural society requires more state action to not just respect the diversity but to bring it together in a common sense of national belonging and that in many instances means adding to a sense of national culture not hollowing it out. The bringing of minority faith communities into playing a role in aspects of the national or public culture alongside Christians and humanists requires us to think differently about the country and so may require an appropriate public narrative about the kind of country we now are; or what we might call a form of multicultural nationalism.⁴ This is a crucial site of how social cohesion can be developed as a site of civic inclusion rather than ethnic restriction. MCSC, tied to a form of multicultural nationalism, seeks, in a context of globalisation and large-scale immigration, to reemphasise the positive role of the nation-state in minority incorporation as well as constructing a sense of national identity and narrative that is inclusive of minorities, who are positively valued as equal citizens.

5. Concluding Remarks

There may be various reasons to rethink political secularism but the most significant today, certainly in Western Europe, is the multiculturalist challenge. It is clear West European states are now highly exercised by the challenges posed by post-immigration ethno-religious diversity and that the new Muslim settlements of the last fifty years or so are at the centre of it. This contribution to the climate of re-thinking freedom of religion and the accommodation of religious diversity has been to argue that what is sometimes talked about as the ‘post-secular’ or a ‘crisis of secularism’ is, in Western Europe, quite crucially to do with the reality of *multiculturalism*. This refers to not just the fact of new ethno-religious diversity but the presence of a multiculturalist approach to this diversity: the idea that equality must be extended from uniformity of treatment to include respect for difference; recognition of public/private interdependence rather than dichotomized as in classical liberalism; the public recognition and institutional accommodation of minorities; the reversal of marginalisation and a remaking of national citizenship so that all can have a sense of belonging to it. This multiculturalist challenge, at one time seen to go with the flow of liberalism—of human rights, racial equality, decomposition of collectivities such as the nation—is properly understood as requiring not just the reform and extension of liberal democratic institutions but a re-thinking of liberalism.

In order to undertake this re-thinking, this article has argued that we need a conception of equal citizenship that brings together the equality of same treatment with the equality of respect for difference, in short, a multiculturalism. This egalitarian difference-sensitive accommodation of religious identities within historical moderate secularism is what is meant by multiculturalising moderate secularism (or multiculturalised secularism, for short). The context we have in mind is Western Europe but the approach can be exercised in other contexts too.

In this it contrasts with, on the one hand, liberal approaches in so far as it is not aiming to derive or justify a position from liberalism, although is contextually consistent with liberal-democratic-constitutionalism (Modood 2016; Modood Forthcoming), and on the other hand, with approaches from outside of Europe for, while it reflects some of the concerns of these with regard to the place and role of public religion, it insists on a mode that is contextually sensitive and contextually developed (Modood and Thompson 2018). This principle is in fact in line with the positions of the authors discussed but cautions us against a simplistic importation of similar norms to different contexts.

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Notes

- ¹ See, for example, [Muslim Council of Britain \(MCB\)](#).
- ² Presumably today she would discern the same in Modi’s India.
- ³ In a European context see [Bader \(2007\)](#).
- ⁴ For more on this see [Modood \(2017\)](#).

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