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Moderate Secularism in Practice: A Comparison of European and Muslim Countries

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Abstract

Multiculturalism has increasingly been identified with ethno-religious identities in recent years. Multiple authors paraphrase the interaction of multiculturalism and secularism as "moderate secularism," which emphasizes equal status of the majority and minority religions. In the academic realm, the discussion on moderate secularism has foremost been limited to Western countries, irrespective that this debate is particularly relevant in non-Western secular countries. This study widens the scope and compares to what degree Western and non-Western Muslim states allow religious minority groups to co-exist with the majority religions. Three European and three non-Western countries are included in the study based on a review of national policies and practices around secularism, analyzed through Modood's framework of moderate secularism. This study finds that the position of minority religions is generally weakened in all the countries, with strong political tensions between different religious groups. While the European countries continue to assess the position of minority religion from a secular perspective, strengthening Christian identity, non-Western countries with strong Islamic constituencies gain more influence in political processes. This study also concludes that Modood's model of moderate secularism is flawed, as it does not take into account political realities and public attitudes.

Keywords: *moderate secularism, multiculturalism, immigration*

I. INTRODUCTION

The heavily increased movement of people across national borders has changed the demographic landscape of many nations across continents. Western "wealthier" countries are struggling to integrate immigrants from various ethnic groups into otherwise homogeneous ethnic and religious cultures. Spurred by the internationalization of liberal human rights, ethnic minorities in many developing countries progressively draw attention to their marginalized position. Ethnic minorities in both of these settings first

and foremost demand structural integration and social rights equal to the entitlements of the majority population. However, ethnic minorities also demand a recognition not only of their rights to practice their cultures, but also of the intrinsic values of those cultures. This movement is referred to as multiculturalism.[1] Advocates of multiculturalism emphasize its democratic values signaling social justice, empowerment, and contribution to equality. It is commonly framed within a human rights discourse as an exalted utility for the prosperity and social harmony of societies.[2]

Since the turn of the millennium, Western societies have questioned multiculturalism as a functional political ideology, as multiculturalism has transformed from being initially understood in terms of ethno-racial identities to being foremost identified with a "way of life".[3] An ascendant view is that certain ethnic communities maintain values at odds with those of Western societies.[4] Hitherto, multiculturalism appears to be retreating in popularity[5], a development not least underlined by the words of the former German Chandler, Angela Merkel in 2015: "multiculturalism leads to parallel societies and therefore remains a 'life lie', or a sham".[6]

Particularly in Western countries, commentators have drawn back from uniformly supporting multiculturalism due to growing resentment among the majority populations against the increased presence of immigrants and their deviation from the "national culture." Initially, the reservations about multiculturalism rested mainly on a conflict between the entitlement of special rights to minorities and the sustainability of a liberal society and the welfare states.[7] Barry[8] argues that multicultural policies do not promote equality, but divert efforts away from universalistic goals. But, where multiculturalism in

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1 Stephen May,"Multiculturalism" in David Theo Gadberg and John Solomos, eds, *Companion to Racial and Ethnic Studies,* Oxford: Blackwell, 2002.

2 Caleb Rosado, *"Toward a Definition of Multiculturalism",* 1996, *Change in Human Systems,* Rosado Consulting, www.rosado.net. Sune Lægaard, "Moderate Secularism and Multicultural Equality" 2008, 28:3, *Politics,* 160-168. Malory Nye, "The Challenges of Multiculturalism", 2007, 8:2, *Culture and Religion,* 109-123.

3 Tariq Modood, Thomas Sealy, "Freedom of Religion and the Accommodation of Religious Diversity: Multiculturalising Secularism", 2021, 12: 10, *Religions*, 1-14. Thomas Roland Johansson, "In defence of multiculturalism-theoretical challenges, 2022, 34:1*, International Review of Sociology,* 75-89.

4 Ralph Grillo, "An excess of alterity? Debating difference in multicultural society", 2007, 30:6*, Ethnic and Racial Studies*, 979-998.

5 Rosa Maria Martinez de Codes, "Moderate Secularism in Europe in the face of Integration Challenges: The debate about legal Pluralism and Multiculturalism", 2020, 28:3, *European Review*, 459-464. Keith Banting and Will Kymlicka, "Canadian Multiculturalism: Global Anxieties and Local Debates", 2010, 35:4, 1193-1222. Will Kymlicka, "Canadian multiculturalism in historical and Comparative Perspective: Is Canada Unique?", 13:1, 2003, *Constitutional Forum*, 1-8.

6 Johansson, *supra note* 3.

7 Keith Banting, Will Kymlicka, "Do Multiculturalist Policies erode the Welfare State", in eds. Banting,K.; Kymlicka,W.,*Multiculturalism and the Welfare State: Recognition and Redistribution in Advanced Democracies,* Oxford, Oxford University Press, 2003.

8 Brian Barry, *Culture and Equality: An Egalitarian Critique of Multiculturalism,* MA: Harvard University Press, 2001.

the past was concretized as a debate about structural integration and the preservation of welfare states, the conversation has radically changed to focus on cultural integration, especially surrounding Muslims and parallel societies that threaten cohesion.[9] Irene Bloemraad et al. point out that many studies in European countries on immigration increasingly focus on the problematic integration of Muslim communities.[10] In Europe, the debate on multiculturalism therefore relates overwhelmingly to the degree of successful Muslim integration.[11]

1. Secularism

A pivotal point in the multiculturalism discussion focuses on the increased importance of religion, as Western countries have difficulties coming to terms with religiously heterogeneous societies where religion is an essential part of social life and general culture.[12] This challenge is accentuated by two opposite sociocultural developments. On the one hand, we observe a growing secularization and individualization of lifestyles, of which both developments are closely related to the progression of human rights and identity politics. Robert Carle writes that multiculturalism in terms of individual lifestyles and "secular rejection of traditional moral customs mutually reinforce each other in Holland. In the academy, the alliance between secularists and multiculturalists fit well into the postmodern notion of the inexorable decline of dogmatic religion and cultural restraints".[13] On the other hand, societies display a growing ethnic, cultural, and religious diversity[14] that challenges traditional religious homogeneity.[15] Martinez argues that multiculturalism immensely challenges institutionalized secularism in Europe, as it confronts Western conventional notions of secularism. These are understood as the privatization of religion (separation between state and religion), individual freedom,

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9 David Goodhart, *The British Dream Successes and Failures of Post-war Immigration,* London, Atlantic Books, 2013. Grillo, *supra note* 4.

10 Irene Bloomraad, Anna Korteweg, Gokce Yurdakul, "Citizenship and Immigration: Multiculturalism, Assimilation, and Challenges to the Nation-State ", 2008:169, *Annual Review of Sociology*, 34, 153-179.

11 Anna Triandafyllidou," Addressing Cultural, Ethnic & religious Diversity Challenges in Europe: A comparative overview of 15 European countries", 2011, 2:1, *Accept Pluralism,* European University Institute.

12 Kirstine Sinclair, "What does it mean to be Danish? The Integration of Muslims in Denmark. A Historical Perspective", 2022, 23:4, *International Migration and Integration*, 2149-2165.

13 Robert Carle, "Demise of Dutch Multiculturalism", 2006: 68, 43, Society, 68-74.

14 Martinez, *supra note 5*:462.

15 Joergen Baek Simonsen, "Fra homogenitet til pluralism. Religionsfrihed og Islam I Danmark" (From homogeneity to pluralism. Freedom of religions and Islam in Denmark), in eds. Lisbeth Chrisstoffersen; Joergen Baek Simonsen *Visioner for religionsfrihed, demokrati og etnisk ligestilling (Visions on freedom of religion, democracy and equality),* Copenhagen, Naevnet for Etnisk Ligestilling, 1999.

equality (including sexual equality[16]), and democracy[17], with a need to balance human rights and the protection of freedom based on personal religious faith. The relationship between multiculturalism and secularism becomes contentious with the possible accommodation of political claims of religious minorities that may transgress the limit to which a state can accommodate religious groups and their practices.[18]

Already in 2007, Maloty Nye[19] pointed out that the debate on multiculturalism is fraudulent, as societies already are irreversibly multicultural and characterized by religious pluralism. Embracing this reality, Tariq Modood[20] argues that multiculturalism must come to terms with dealing with secularism. Charles Taylor follows suit by stating that multiculturalism and secularism are converging.[21] Taylor[22] writes, "The main point of a secularist regime is to manage the religious and metaphysical-philosophical diversity of views fairly and democratically". Taylor stresses that religion itself is not the central object of secularism, but rather its intrinsic values including individual freedom, equal citizenship, and democratic legitimacy.[23] Those aims should guide how we manage the separation of state and church and the neutrality of public institutions.[24] Today, secularism is hardly delineated along the lines of radical, dogmatic separation of state and religious institutions. Secularism is conventionally paraphrased as *moderate secularism,* a means to conceptualize the interactions of secularism and multiculturalism.[25]

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16 Haldun Gulalp, "Debating secularism: a liberal cosmopolitan perspective", 2023, 8, *Frontiers in Sociology*, National Library of Medicine.

17 Elisa Banfi, Matteo Gianni, Marco Giugni, "Religious minorities and secularism: an alternative view of the impact of religion and the political values of Muslims in Europe", 2015, 42:2, *Journal of Ethnic and Migration Studies*, 292-308.

18 Tariq Modood, *Multiculturalism*, UK, Polity, 2007.

19 Nye, *supra note* 2.

20 Tariq Modood, Riva Kastoryana, "Secularism and the Accommodation of Muslim identities" in eds. Gino G. Raymond, Tariq Modood, *The Construction of Minority Identities in France and Britain*, London, Palgrave Macmillan, 2007.

21 Charles Taylor, "Secularism and Multiculturalism" in ed. John R. Boatright, *Values and Ethics for the 21st Century,* BBVA, 2011:59.

22 Charles Taylor, "How to Define Secularism." In edt. Charles Taylor et Alfred Stepan, *Boundaries of Toleration,* . New York: Columbia University Press, 2014.

23 Kymlicka, Will, "The Governance of Religious Diversity: The Old and the New," in eds. Bramadat, Paul; Matthias Koenig, *International Migration and the Governance of Religious Diversity,* Metropolis, 2009.

24 Banting, *supra note* 7.

25 Rajeev Bhargava. "How Secular Is European Secularism?", 2014, 16:3, *European Societies*, 329–36. Sune Laegaard, "Moderate secularism and Multicultural Equality", 2008, 28:3, *Politics,* 160-168. Taylor, *supra note* 23. Kymlica, *supra note* 24,

II. AIM OF STUDY

This article sets out to further examine the complex relationship between multiculturalism and secularism and how these constructs realize equality between minority and majority religions.

However, the discussion of the relationship between secularism and multiculturalism in international academic journals is overwhelmingly Western-centric, mainly concerning the inclusion of Muslims into "secular" Christian countries. With the words of Charles Taylor in mind - that secularism is a Christian conceptualization of the relationship between religion, state, and the individual[26] - it follows that it may be an ineffectual academic endeavor to compare secularism in so-called Christian and Muslim countries, as secularism may not be similarly defined in the different religious regimes. The trajectory of the development of multiculturalism and the political position of religion is distinctively different in non-European countries with a colonial history. Though the majority of countries with a Muslim majority do not adhere to a secular regime, several large Muslim countries either fully or to some degree identify themselves as secular states. Therefore, this study is based on a review of the relationship between multiculturalism and secularism in three European and three non-European Muslim-majority countries. Whereas the debate in Europe focuses on the inclusion of Muslims into secular Christian countries, it would equally be relevant to examine the position of minority religions, in particular, Christianity, in secular Muslim-majority countries and how this may influence the relationship between multiculturalism and secularism.

III. METHODOLOGY

The UK, France, and Denmark have been selected for the Western European case studies, as they display different combinations of the relationship between multiculturalism and secularism. The UK is commonly perceived as practicing the most extensively multicultural policies in Europe while sustaining a state church. France practices an assimilatory model of integration into a common French culture that restricts religion to the private sphere and formally relies on a complete separation of church and state. In-between these opposites, Denmark leans towards an assimilatory approach to integration, and the country upholds a state church which is an integral element of the national culture. Though freedom of religion is a fundamental principle in the Constitutions of the three countries, the extension of freedom is applied differently according to the institutional environment.

Indonesia, Turkey, and Nigeria were similarly chosen to provide a spectrum of multicultural and secular policy approaches. Indonesia includes freedom of religious practice among the recognized six religions in their constitution, upholding theistic

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[26] Charles Taylor, "What is Secularism" in eds. Geoffry Brahm Levey and Tariq Modood, *Secularism, Religion and Multicultural Citizenship,* Cambridge, Cambridge University Press, 2009:xix.

secularism as a founding tenet yet forcing citizens to legally align themselves with an approved theistic religion. Turkey upholds a strict constitutional secularism, however, the sociopolitical reality is quite influenced by religious values. Nigeria is likewise secular as per its constitution, but religion has had a strong mediating role in political power, as well as contributed to a bloody history within the state. All three countries have strong Islamic influence within state and local administrations, however, Indonesia and Turkey's Muslim-majority populations contrast with Nigeria's lack of a religious majority in the contexts of their secular approaches. The positive accommodation for and political promotion of religion within each country is quite varied, and multiculturalism is supported to varying degrees. We will refer to the two groups respectively as *European* and *Muslim* countries. We have created a table to assist in our analysis of the countries of interest.

1. Analytical Framework

Applying the notion of "moderate secularism" allows us to deviate from a dogmatic understanding of secularism and perform a more flexible comparative analysis. In the debate about multiculturalism and secularism, Modood's moderate secularism is touted as a way forward to reconcile the accommodation of minority religions in states with one dominant religion. The model mainly addresses the inclusion of Muslims as equal members of a non-majority Muslim society, and Modood does not claim that his model of moderate secularism is valid outside of a Western Christian majority context, yet we find that it may be suitable for analyzing non-Christian religious regimes due to its minimalist conceptualization of secularism. This permits a broad analytical approach that should enable us to include and compare findings of very different characters.

Modood distinguishes between radical and moderate secularism, and shows how European nations historically have never practiced radical secularism - a complete separation between state and religion. Western Europe is dominated by a pragmatic rather than ideological secularism allowing for symbolic, institutional, and fiscal linkages between the state and aspects of Christianity. Modood applies the term "moderate secularism" to these regimes.[27] For ethno-religious groups to attain their status of equality within the democratic state, they must receive appropriate recognition by pluralizing existing state-religion connections.[28] Modood claims that these institutional compromises should be extended to accommodate Muslims in order for the "pluralistic institutional integration" to be "the appropriate response to the new Muslim challenges"[29], as contemporary Muslim claims for accommodation in Western Europe are not counter

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27 Tariq Modood, "Moderate secularism, religion as identity and respect for religion." 2010:4, 81:1, *The Political Quarterly*, 4-14.

28 Tariq Modood, "Multicultural Citizenship and New Migrations", in ed. A. Triandafyllidou, *Multicultural Governance in a Mobile World*, Edinburgh University Press, 2017.

29 Modood, *supra note* 18.

to the practice of moderate secularism.[30] Modood sees moderate secularism as an "implication of multicultural equality" for both groups and individuals.[31]

Moderate secularism asserts that religious identity is equivalent to other attributes of cultural authenticity, such as gender, sexual orientation, or race. Individuals are not isolated entities, but members of communities through which they establish their social and political identities.[32] This supports the liberal view of humans as free-choice agents that are entitled to identical, individual protection rather than a communitarian approach of safeguarding the interests of the group in order to protect the individual.[33]

2. Moderate Secularism

Arguably the most important assumption off of which Modood bases moderate secularism is the idea that inclusion is fostered through multiculturalism, rather than secularism. Modood promotes the idea of a pluralistic "thickening" of national culture rather than a subtractive approach to secularism.[34] This is a somewhat radical idea to other secularism scholars, and denotes a shift in thinking from multiculturalism as the catalyst for inclusion to (moderate) secularism as a facilitator of inclusion and positive accommodation. However, Mahmood[35] emphasizes that secularism is not a static category with a uniform genealogy, meaning that the discussion of secularism must be performed with respect for the individual state's formation.[36] Particularly in the case of France, as well as Denmark, laicite - radical secularism - is not about the promotion of tolerance.[37] It is about controlling "certain religious expressions and subjectivities in the French public sphere".[38] In the words of Wieviorka[39], secularism simply does not rest on a policy of recognition of religious identities.

Moderate secularism, though touted by Modood as a solution to issues of religious tension throughout Western Europe, does not stand without its opponents; as Bhargava[40]

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30 Tariq Modood, "Moderate Secularism and Multiculturalism," 2009:71, 29:1, *Politics,* 71-76.

31 Modood, *supra note* 18:78.

32 Gulalp, *supra note* 16. Johansson, *supra note* 3.

33 Bloemraad et al, *supra note* 10.

34 Modood et al, *supra note* 3.

35 Saba Mahmood, "Secularism, hermeneutics, and empire: The politics of Islamic reformation", 2006:323, 18:2, *Public Culture,* 323-347.

36 Eva Haque, "Homegrown, Muslim and other: tolerance, Secularism and the limits of multiculturalism", 2010, 16:1, *Social Identities: Journal for the Study of Race, Nation and Culture*, 79-101.

37 Talal Asad, "Reflections on Laicite & The Public Sphere", 2005, 5:3, *Items and Issues*, Social Science Research Council.

38 Hague, *supra note* 36: 83.

39 Michel Wieviorka, "Multiculturalism: A concept to be redefined and certainly not replaced by the extremely vague term of intercultulralism", 2012, 33:2, *Journal of Intercultural Studies,* 225-231.

40 Rajeev Rajeev. "Beyond moderate secularism" in eds. Losonzi, P; Van Herck, W., *Secularism, Religion, and Politics* India and Europe, pp. 57-64. Routledge India, 2014.

states, "Moderate secularism, for me, is irretrievably flawed. The multiculturalization of this secularism is neither easy nor sufficient...Quite plainly, current European institutions are deeply biased. They have accommodated Christians but will not be able to accommodate Muslims." Modood[41] however asserts that minority religious institutions should receive the same governmental financial support as is given to majority religious institutions, such as churches. This ensures unbiased positive accommodation for all religious traditions, and reinforces the "public good" nature of religion and religious institutions.

Although Modood is at the forefront of the discussion around moderate secularism, he does not hold a monopoly on the term. Moderate secularism is the focus of a range of authors, notably including Laegaard[42] and Taylor.[43] Interestingly, Modood observed "that all actually existing secularisms are moderate"[44], yet provides us with a five-point structure for the features of moderate secularism. This framework is specific, yet authors have been applying his term "moderate secularism" to a range of secular political systems far outside the bounds of his aforementioned definition. Laegaard[45] brings a normative critique to the term, asserting that there is disagreement about the type of "equality" for which moderate secularism is striving to uphold.

Of the main criticisms of moderate secularism, the most significant arguably relates to Modood's conception of whether Muslims should be considered a social group, and the implications of this as a functional policy. To use Laegaard's[46] words, "his characterisation of multicultural equality is inadequate in several respects that leave the meaning, justification and implications of moderate secularism unclear". Modood's focus on group, or collective, rights and the transformation of Islamic communities into social groups with state-recognized rights to promote "multicultural equality" bring forth issues of individual expression and liberal values.

To analyze these concepts, we are utilizing Modood's framework for moderate secularism, which includes the following five points.[47]

1. Mutual autonomy, not mutual exclusion or one-sided control;
2. Religion is a public not just a private good;

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41 Tariq Modood. "Multiculturalism and moderate secularism.", 2015, *Robert Schuman Centre for Advanced Studies Research Paper No. RSCAS* 47

42 laegaard, *supra note* 2.

43 Charles Taylor, "How to Define Secularism," in *Boundaries of Toleration*, Religion, Culture, and Public Life: New York: Columbia University Press, 2014, 59–78.

44 Sune Lægaard. "Moderate Secularism, Difference Sensitivity and Contextualism: A Rejoinder to Modood." 2009, 29:1, *Politics*, 77–81.

45 *ibid.*

46 Lægaard, *supra note* 2.

47 Modood, *supra note* 41.

3. The national Church or churches (ie. the organizer of this public good) belongs to the people/country, not just to its members and clergy;
4. It is legitimate for the state to be involved in bringing out the public good element of organised religion (and not just protecting the public good from the dangers that organised religion can pose); and,
5. Moderate secularism can take different forms in different times and places and not all forms of establishment should be ruled out without attending to specific cases.

The final point is of note in this paper, as it allows for a broad "loophole" for analysis. Especially as our analysis encompasses a mix of Western and non-Western contexts, we appreciate Modood's idea of a flexible definition within a range of cultural contexts.

IV. FINDINGS

The main variables in the analysis of secularism in the six countries make up *Table 1.* The table operates as an overview of the analysis.

Table 1. Overview of the variables in the analysis of secularism in the six countries included in the study held up against the five-point framework of moderate secularism by Tariq Modood.

Country	Demographics (approx.)	Secularism Legislation	Education Policy	Financial support	Religion and Politics	Controversies	Moderately Secular?
Indonesia	88% Muslim 10% Christian/Catholic 2% Other	Pancasila	Right to education in one's personal faith by a teacher of that faith (Education Law No. 20 of 2003)	Incredibly strong political-economic ties between Jokowi and Nahdlatul Ulama Islamic organization	Tight societal relationship between religious and political values	Lack of recognition of atheism Separation instead of multicultural policy	Positive accommodation of religion by government Religion is a public good No national religious institution Mutual autonomy, however less support for minority religions
Turkey	99% Muslim 1% Other	Laicism	Compulsory "religious knowledge and ethical" education	Strong social service grants to faith-based organizations ("Indirect Political Patronage" (Köse))	Socially, a Muslim country; even if government is politically secular	Lack of recognition of minority religions	Religion not supported as a public good Strict separation of government and religion No mutual autonomy No national religious institution
Nigeria	50% Muslim 48% Christian 2% Other	Secular constitution, influenced by British colonialism	Religious education of a different faith cannot be forced upon students	State subsidies for ethno-religious groups	Regional clashes of politics and religion; religious groups jockeying for political power	Violent history of religious clashes; impacts of colonialism	Religion is considered a public detriment "Forced" mutual autonomy National mosque and church
United Kingdom	46% christian 10% Muslims 25 No religion 82 % describe themselves as ethnic white, about 10% as British Asian and the remaining as Black british, Caribbean or African	Anglican state church Formal recognition of other faith communities No specific discriminatory measures towards the construction of places of worship of minority religions	State funded non-religious and faith-schools	Anglican Church some financial support, no support to other faith communities	Religion and politics divided No political parties associated with a specific faith No national party with a direct anti-muslim agenda	Increasing public aversion towards Muslims and their granting of special rights and Muslim faith schools	Financial support and official recognition of Muslims as a social group Religion seen as public good (Cultural rituals within faith communities and faith-based charity organizations) Faith-based educational institutions
France	59% Catholics 24% no religious affiliation 9% Muslims 88% French by birth. Immigrants and descendants, 12 %, mainly from North Africa	Strict division between state and religion No sign of religion in the public sphere Restriction of building sites of minority religions	Religion banned from state schools Subsidization of Christian and Jewish schools	No financial support directly to religious communities State pay salaries for Catholic chaplains in public institutions	Religion and politics strictly divided No national political parties with religious affiliation National parties with anti-muslim agenda	Muslim population detached from mainstream society, big socio-economic differences between Muslims and general population Strong anti-muslim sentiment Anti muslim political movement	French state financial support of religious schools No recognition of Muslims as a social group with special rights Religious charity organizations
Denmark	Ethnic Danes make up 84% of the population Remaining population is about 10% are immigrants or descendants from non-Western countries About 72% are members of the national church, 5 % are Muslims	State church inscribed in the Constitution No formal recognition of minority rel. Communities	No confessional teaching at state schools Government financial support (80% of costs) religious free schools	State church 100% financed by the state No financial support to religious communities	Separation between politics and religion No religious political parties No national party with a direct anti-muslim agenda	Financial support of Muslim schools accused of not following national curriculum and proliferating anti-liberal teaching Muslim children are exempt from social school activities	State church central to cultural life No recognition of Muslims as a social group No financial support of religious minority groups Financial support of faith schools

1. Western Countries

Non-Western Muslim immigrants and their descendants make up an increasing part of the population in France, the UK, and Denmark, as is shown in Table 1. The integration of immigrants and particularly Muslims in these countries was originally directed by distinctively different policies reflecting contrasting political ideologies and perceptions of the practice of secularism. Historically, the UK has viewed immigration as a positive addition to British life[48], and the national culture celebrates distinctive identities of different cultural, ethnic, and religious groups.[49] Legislation protects those groups by granting them special treatment and legal protection and allowing them as minority groups to self-determine aspects such as dress codes and permission of the construction of places of religion.[50] Group rights are recognized as complementary to individual rights.[51]

In opposition to British culture, France is an exponent of Republicanism. French citizenship is based on civic rather than ethnic or religious properties with aims to formulate a common French identity[52] that emphasizes the notion of the individual over the group. Equality between citizens is created by highlighting differences and reducing affiliations with cultural and religious groups to the private sphere.[53] The relationship between state and individual must exclude any intermediary and immigrants must assimilate into one common national culture.[54]

Although it endorsed multicultural policies at the initial arrival of non-Western immigrants, Denmark has increasingly relied on an assimilative approach to immigration, and especially Muslim immigration.[55] The generous Danish welfare state is perceived to be the fundamental constituent of the tight-knit social integration of Danes as "one people", and Danish identity is closely linked to a symbiosis of the welfare state and the

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48 Triandafyllidou, *supra note* 11.

49 Ziv Orenstein, Itzchak Weismann, "Neither Muslim nor Other: British Secular Muslims", 2016, 27:4, *Islam and Christian-Muslims Relations,* 379-395.

50 Christian Joppke, "Multiculturalism and immigration: A comparison of the United States, Germany and the Great Britain", 1996, 25, *Theory and Society*, 449-500. Pragna Patel, "Cohesion, Multi-faithism and the Erosion of Secular Spaces in the UK: Implications for the Human Rights of Minority Women", 2011: 35, 42:1, *IDS Bulletin,* 26-40.

51 Pragna, Patel, "Cohesion, Multi-faithism and the Erosion of Secular Spaces in the UK: Implications for the Human Rights of Minority Women, 2011, 42:1, *IDS Bulletin*, 26-40.

52 JinLing Zhang, "Intrinsic conflicts within ethnic and religious issues in France", 2023, 7:15, *International Journal of Anthropology and Ethnology*, 1-20.

53 Triandafyllidou, *supra note* 11.

54 Aprillia Firmonasari; Wening Udasmoro; Yohanes Tri Mastoyo, "Understanding Secularism and National Identity in French Political Discourses", 2020:138, 32:2, *Humaniora,*135-150.

55 Triandafyllidou, *supra note* 12. Mikkel Rytter; Marianne Holm Pedersen, "A decade of Suspicion: Islam and Muslims in Denmark after 9/11", 2014, 37:13, Ethnic and Racial Studies, 2303-2321.

national Lutheran church.[56] Christianity has been secularized as a "common culture" embracing democracy, solidarity, egalitarianism, and the duty to work. The debate on immigrants mainly concentrates on their willingness to adopt these secular values.[57]

The state's approach to multiculturalism is reflected in its legislative protection of minority religions. The constitutions of the UK and Denmark ascribe the countries to be founded on Christian values with state churches: the Anglican Church of England and the Evangelical Lutheran Church of Denmark, respectively. The former is partly funded[58] the latter fully funded by the state.[59] In line with its multicultural policies, the UK provides state funding of Muslim organizations, accepts the construction of purpose-built mosques, and institutionalizes Islam through the recognition of socio-religious institutions parallel with Christian institutions of the host country.[60] In Denmark, there is no official recognition of Islam as an integrated religion and therefore no institutionalized cooperation between Muslim communities and the state.[61] Similar to most other European countries such as France, Denmark puts up discriminatory restrictions on constructing places of worship, including mosques.[62] A central institution in France is *laicite,* the French model of republican secularism. Laicite upholds a strong division between state and church and a policy of no funding of religious activities. It strongly emphasizes that religion belongs to the private sphere.[63] The state must have a morale independent of all religions and employ the supreme morale.[64] The law prohibits public displays of religious symbols, which applies to the actions of the public as individuals in the public sphere.[65] Most noticeable is France's ban on women wearing a headscarf or any clothing covering the face.

When analyzing secularism in the European countries within Modood's framework, it is appropriate to differentiate between the separation of church and state and the public culture of secularism. Examining the former, Modood describes France to be "actively"

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56 Mikkel Rytter, "Writing against Integration: Danish Imaginaries of culture race and belonging", 2018, 84:4, *Ethos,* 678-697. Anne Lundahl Mauritsen et al, "Cultural religion: patterns of contemporary majority religion in Denmark", 2023, 38:2, *Journal of Contemporary Religion,* 261-281. Laura Gilliam, "Being Muslim "without a fuss": relaxed religiosity and conditional inclusion in Danish schools and society", 2021, 45:6, *Ethnic and Racial Studies,* 1096-1114.

57 Per Mouritsen, "The Particular Universalism of a Nordic Civic nation: Common Values, State Religion and Islam in Danish Political Culture" in eds. Tariq Modood; Anna Triandafyllido; Richard Zapata-barrero, *Multiculturalism, Muslims and Citizenship*, London, Routledge, 2006:81. Gilliam, *supra note* 56.

58 Frank Cranmer, Paying the Piper? *Public funding of Religions in Europe*, UK, Routledge, 2015.

59 Tim Jensen; Karna kjeldsen, "Non-confessional RE in Denmark and Rights to Exemption: A Study of Religions cum Human Rights Perspective", 2022, 13:11, *Religions,* 1-16.

60 Patel, *supra note* 51.

61 Kasper Ly Netterstroem, "Denial and Pragmatism: Islam and the Danish State", 2021, 14, *Journal of Religion in Europe*, 133-161.

62 *Ibid.* Jonathan Fox, *The Unfree Exercise of Religion*, Cambridge, Cambridge University Press, 2016l

63 Asad, *supra note* 37.

64 Taylor, *supra note* 226.

65 Firmonasari et al, *supra note* 54.

secular with a radical separation between church and state.[66] The essence of Modood's moderate secularism is the existence of a state religion that leaves room for equal recognition and opportunities for minority religions to subsist. However, the practice of laicite fails to fit into Modood's model and does not encompass the relationship between the majority and minority religions, as the state does not in any way regulate religious matters. Contrary to France, the position of the Danish church is inseparable from the state, as the church is a fundamental bearer of the secular values of the state.[67] The state-church relationship is a very strong "establishment," leaving no official recognition or direct financial support for minority religions and as such undermining the premise of mutual autonomy in line with Modood's moderate secularism. The UK differs from France and Denmark, upholding a state church that may recognize institutional representation of Islamic organizations and the provision of funding for Islamic places of worship.[68]

Averting from the direct relationship between church and state, elements of moderate secularism as defined by Modood are identified in all three countries. The perception of religion as a public good manifests in the integration of faith groups into social services in all the countries.[69] Equally, religious educational institutions are also incorporated in the school systems. But, where Muslim state schools have been included in the British schooling system, religious schools are left to the private realm in France and Denmark. In Denmark, Muslim tuition-free schools receive state funding in line with other secular and non-secular tuition-free schools.[70] The French state also offers financial support to religious tuition-free schools, but only Christian and Jewish schools qualify for economic support.[71]

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66 Laegaard, *supra note* 2.

67 Lisbeth Chrisstoffersen, "Religion, Ret og Samfund" (Religion, Legal Rights and Society) in ed. Lisbeth Chrisstoffersen, *Samfundsvidenskabelige Syn paa det Religioese* (The Perception of the Social Sciences' View of Religious Matters), Copenhagen, Jurist –og Oekonomiforbundets Forlag, 2001.

68 Amika Wardana, "Institutionalising diasporic Islam: Multiculturalism, secularism and the integration of Muslim immigrants in Britain", 2013, 3:1, *Indonesian Journal of islam and Muslim Societies,* 31-72.

69 Joern Henrik Petersen, Klaus Petersen, Soeren kolstrup, "Autonomy, Cooperation or Colonization? Christian Philanthropy and state Welfare in Denmark", 2014, 56:1, *Journal of State and Church,* 81-104. Martha Middlemiss Le Mon, "The "In-between"Church: Church and welfare in Darlington" in eds. Anders Backstrom; Grace Davie; Ninna Edgardh; Per Pettersson, *Welfare and Religion in 21st Century Europe: Volume 1*: *Configuring the Connections*, Routledge, UK. Corinne Valasik, "Church-state relations in France in the field of welfare: a hidden complementarity" in edt Corinne Valasik, "Church-state relations in France in the field of welfare: a hidden complementarity" in edt. Anders Backstrom; Grace Davie; Ninna Edgardh; Per Pettersson, *Welfare and Religion in 21st Century Europe: Volume 1*: *Configuring the Connections*, Routledge, UK., *Welfare and Religion in 21st Century Europe: Volume 1*: *Configuring the Connections*, Routledge, UK.

70 Per Mouritsen; Nanna Vestergaard Ahrensberg; Kristian Kriegbaum Jensen, "Medborgerlig Integration paa Muslimske friskoler" (Integration into the civil Society at Muslim free Schools), 2022, 95:1, *Oekonomi & Politik,*8-24.

71 Asad, *supra note* 37

However, in Denmark and the UK, Muslim schools have been criticized for not following national curriculum and teaching liberal secular values, which has instigated political debates about their legitimacy in the educational system.[72] The critique surrounds to what extent a society must accommodate the practice of ethnic-religious cultures and grant special rights to a religious group. France maintains its position to not recognize Muslims as a specific social group, as this contravenes the republican principles. Equally, Denmark confutes the important premise of Modood's school of thinking that Muslims should be juxtaposed with other minority social groups. Commentators point out that Modood's communitarian view, emphasizing the need for a group orientation to rights, can overlook structural explanations for pronounced poverty within many Muslim communities in the three countries[73], instead attributing this to differences along ethno-religious lines.[74] Secondly, Brubaker's deliberation over essentialism of religion[75] and the resulting infringement of individual rights finds support among secular British Muslims, who argue that policies have falsely homogenized an otherwise very diverse group that is pressurized to conform to a group identity out of choice.[76]

A substantial and growing section of the public in all three countries has turned their backs to multiculturalism along religious lines. Both the political left and right in France support laicite, as it is regarded as a barrier against Muslim influence and a protection against the *perceived* discrimination of women and strong patriarchal structure in Muslim culture.[77] In the words of French President Macron, "Muslims must be French"[78]; They must adhere to Christian-formulated secularism. Though a strong aversion towards Muslim women wearing the veil in public has almost fully subsided, surveys show that many Danes still perceive Muslims as an imposition to Danish society.[79] A growing aversion towards Muslims is also observed in the UK. Triandafyllydou[80] points out that multicultural policies in the UK have created animosity towards Muslims among a significant section of the British public, while Poole[81] quotes *The Times,* stating that the

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72 Mouritsen, *supra note* 70.

73 Jane freedman, "Secularism as a Barrier to Integration? The French Dilemma", 2004, 42:3, *International Migration,* 5-27. Anthony Heath; Li Yaojun; Tom Woerner-Powell, "Trapped in Poverty?: A study of Transient and Persisting Factors for Muslim Disadvantages in the UK", 2015, 11:2, *Comparative Islamic Studies*, 205-233.

74 Hague, *supra note* 36.

75 Rogers Brubaker, "Categories of analysis and categories of practice: a note on the study of Muslims in European countries of immigration", 36:1, *Ethnic and Racial Studies*, 1-8.

76 Orenstein, *supra note* 59.

77 Asad, *supra note* 37.

78 Firmonasari et al, *supra note* 54.

79 Martin Lindhardt, "In Denmark we eat pork and shake hands! Islam and the anti-islamic emblems of cultural difference in Danish neo-nationalism", 2021, 25:4, *European journal of Cultural Studies*, 1139-1155.

80 Triandafyllidou, *supra note* 11.

81 Elizabeth Poole, "The case of Geert Wilders: Multiculturalism, Islam, and identity in the UK", 2012:184, 5:2, *Journal of Religion in Europe,* 162-191.

UK is fragmented due to failed multicultural policies, along with granting Muslims preferential treatment and cultivating anti-liberal ideas. Responding to the sentiment of the majority religion is high on the political agenda, and these public debates draw up confrontational lines between Muslims and non-Muslims. Though politics and religion traditionally have been clearly separated in the three countries, mainstream political parties increasingly hold a skeptical position towards the adaptation of Muslim culture, and promote more coercive policies.[82] Paradoxically, the separation of politics and religion is gradually undermined by an acrimonious debate over how to preserve a secular culture in politics.

The complications of the inclusion of Islam into Western countries is also a reflection of the oppositely directed trend of diminishing local attachment to established Europeans religions; immigrant populations have a much stronger affiliation with institutionalized religion.[83] We can observe two opposite developments: increased secularization concurrent with de-secularization in these societies.[84]

These conflicting developments are not addressed in Modood's analysis of the practice of secularism. Instead, Modood's moderate secularism is premised on the "irreversible" fact that societies are de facto multicultural and that secularism and multiculturalism are converging - religion in liberal societies is epitomized by growing religious diversity and simultaneously a decline of dogmatic religion and cultural restraints.[85] However, the public's lack of identification with institutions of primarily Christian affiliation (and also Islam) cannot automatically be understood as less religious. Today, the common marker of identity of Danes is "cultural Christian". It is an emphasis on "secular Christianity", that inherently distances itself from the influence of institutionalized, more rigid, practice of faith. Modood's moderate secularism is primarily concerned with the relationship between the formal institutions of the majority and minority religions and politically- made constructions to safeguard this relationship. In the process the model fails to encompass the importance of the attitude of the public and the practice of their faith.

2. Muslim Countries

Among the three non-Western countries we are including in this analysis, the clearest difference, other than geographic location, is the religious demographics. Indonesia has a clear Muslim majority (88%), however still has a sizable non-Muslim population;

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82 Banting, Kymlicka, *supra note* 5.

83 Geoffrey Brahm levey, "Secularism and Religion in a Multicultural age" in eds. Geoffrey Brahm levey et Tariq Modood, *Secularism, Religion and Multicultural Citizenship,* Cambridge, Cambridge University Press, 2009.

84 Khalil Abdurrashid, "Islam and the Secular Age: Between Certainty and Uncertainty", 2017, https://yaqeeninstitute.org/read/paper/islam-and-the-secular-age-between-certainty-and-uncertainty?

85 Carle, *supra note* 13:68.

Turkey has an incredibly small non-Muslim population (1%); and Nigeria does not have an overall clear religious majority, however a strong Muslim citizenry (50%).[86]

All of these countries take unique approaches to secular policy; to start, Indonesia has implemented the ideology of *Pancasila*, ingraining religious practice into their secular constitution without a singular state religion.[87] *Pancasila*, Indonesia's declaration of its philosophical founding principles, notably includes "*Ketuhanan yang Maha Esa*" (Belief in the one and only God) as the first *sila* (principle) on its list; religion is an integral part of Indonesia's ethical foundations (causing issues for atheists and unrecognized religions). We see strong historic conflicts between the main dominant (Islam) and minority (Christianity, minority Muslim) religious groups in Indonesia, and the influence of orthodox Islam in state discourse.[88]

Turkey's multicultural approach is traditionally secular - within the reforms of the early 1900s, the government integrated laicism. Interestingly, laicism was initially instituted as a means for citizens to challenge the Islamic clergy's growing political power.[89] An adherement to strict secularism within this functionally Muslim country has caused challenges for Turkey's ethnic, linguistic, and religious minorities, including Jews, Kurds, Assyrians, and Armenians, among others.[90]

Finally, Nigeria provides yet another perspective on secularism, strongly incorporating the role of colonialism within the construction of Nigeria's secularism; secularism was originally instituted by the British through their government's separation of religion and state.[91]

The historic construction of all three countries' secular policies has been heavily influenced by colonialism and/or general Western pressures. Though Turkey was not considered a colony, the tensions with European culture and inclusion meant that there were external pressures attempting to dictate the state's approach. For Nigeria and Indonesia, colonialism has impacted the structure of the relationship between religion and state. For example, there is a strong historic pattern of state oppression towards minority religious rights in Indonesia accentuated by biased regulations; a "hands-off"

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86 See *Table 1.*

87 Pew Research Center. "Muslim Population of Indonesia," November 4, 2010. https://www.pewresearch.org/religion/2010/11/04/muslim-population-of-indonesia/.

88 Greg Barton. "Indonesia: Legitimacy, Secular Democracy, and Islam.", 2010, 38:3, *Politics & Policy,* 471- 496. Al Khanif. "The Challenge to Implement Religious Freedom for Minority in Indonesia As a Multicultural State", 2010, 1:1, *Journal of Indonesia Focus,* 16-23.

89 Ayhan Kaya, Max-Valentin Robert, and Ayşe Tecmen, "Populism in Turkey and France: Nativism, Multiculturalism and Euroskepticism", 2020,21:3, *Turkish Studies*, 361-391.

90 Kenan Çayır, "Citizenship, Nationality and Minorities in Turkey's Textbooks: From Politics of Non-Recognition to 'Difference Multiculturalism", 2015, 51:4, *Comparative Education,* 519–36.

91 Mukhtar Umar Bunza, "Islamism Vs Secularism: A Religious- Political Struggle in Modern Nigeria", 2002,1:2. Journal for the Study of Religions and Ideologies, 49-65.

approach to religious governance utilized within the country led to intolerance.[92] In Nigeria, British law was instituted and militarily enforced, and this in itself was seen as a religious mandate; as Bunza states, "the English law is basically Christian," meaning that proponents of the previously-instituted Shari'a law were incensed and felt their religious rights restricted.[93] Nigeria's historical relationship with religion is complex and bloody.[94] As compared to the other countries included in this study, scholars' approaches to multiculturalist solutions in Nigeria are more hesitant, seemingly due to the strong and violent religious tensions that lie between Islam and Christianity. This was clearly exacerbated through colonial violence and the formidable power held by the Christian British colonists.

In the present day, all three countries exhibit strong political and financial ties between religious groups and the state.[95] The most apparent of these is in Turkey, where the AKP governing party is essentially considered a religious party. Turkey also provides state funding to religious organizations, which Köse demonstrates is a means to spread political patronage implementation.[96] Though they staunchly do not have a state religion, Indonesia's government similarly holds strong religious ties to Islamic groups, and Islam is pivotal to political discourse and campaigning.[97] In Nigeria, politics and religion clash more strongly on the regional level, with religious majorities fighting for state power to implement religious practices and values in the regions in which they have control, effectively neglecting religious minority communities.[98] Ethno-religious groups in Nigeria do receive state subsidies, which Ifeka describes as "leaders and ethno religious

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92 Al Khanif. "The Paradox of Religious (in)Tolerance in Indonesia." The Jakarta Post, October 16, 2015. https://www.thejakartapost.com/news/2015/10/16/the-paradox-religious-intolerance-indonesia.html.

93 Bunza, *supra note* 91.

94 Ilemobola Olanewaju, Ronald Loromeke, and Raquel Asuelime. "Multiculturalism, Value Differences and Cross-Cultural Conflict in Nigeria: Surgery on a Centenarian", 2017:58, 6:1, *Journal of African Union Studies*, 39-62.

95 Miracle Ajah, "Religious Education and Nation-Building in Nigeria.", 2015, 1:2, *Stellenbosch Theological Journal*, 263–82; Zana Çitak, Aykan Erdemir, and Tuğba Tanyeri-Erdemir, "Differential, Disguised and Deterritorialized: State Funding of Religion in Turkey." in edt. *Public Funding of Religions in Europe*. Routledge, 2015; Jakhongir Shaturaev. "Financing and Management of Islamic (Madrasah) Education in Indonesia." 2021, 42:1, *Zeszyty Naukowe Politechniki Częstochowskiej Zarządzanie,* 57–65.

96 Sakine Arslan Köse. "Faith-Based Organizations in Turkey as Indirect Political Patronage Tools." 2019, 5:1, *Palgrave Communications,* 1–12.

97 Alexander R Arifianto. "From Ideological to Political Sectarianism: Nahdlatul Ulama, Muhammadiyah, and the State in Indonesia." 2021, 49:2, *Religion, State and Society*, 126–41; Barton, *supra note* 88; Zaenal Muttaqin, "Challenging Secularism: Considering Islam and State in Indonesia." 2010, 6:2, *TSAQAFAH*, 360-377.

98 AlubaBari Desmond Nbete. "From Multiculturalism to Humanistic Secularism: Harnessing Nigeria's Cultural Diversity." 2020:168, 9:1, *AFRREV IJAH: An International Journal of Arts and Humanities,* 155-170.

followings commoditysing political relationships through money."[99] Religion/state relationships are financially mediated, in addition to the moral motivations for religious group political involvement seen in all three countries.

Even for countries that preach strict secularism, such as Turkey and Nigeria, education has become a battlefield for religious moral instilment and educational freedom. In Nigeria, the government took over religious schools in the 1970s, converting them into a public venture.[100] In line with secular policies, Nigeria's constitution states that religious education outside of one's own faith cannot be forced upon those attending educational institutions; however, strictly segregated Christian or Muslim religious education tracks have remained a strong facet of primary and secondary school curricula.[101] Jawoniyi further describes how some publicly-funded schools have failed to comply with this constitutional mandate, only offering one track of religious education (Christian or Muslim) and hindering students' right to religious freedom. Indonesia faces similar tensions, albeit Education Law No. 20 of 2003 states that no matter the religious denomination of a school, students have a right to education in their personal faith "from a teacher of that faith".[102] This is a controversial clause, as some believe it infringes on a community's right to hold a school of a certain religion.[103] Religious institutions of all kinds in Indonesia, outside of Hindu schools, utilize a confessional approach to emphasize religious truth claims; this is regulated and driven by the Ministry of Religious Affairs.[104]

Turkey's circumstances as an overwhelmingly Muslim country led to unique tensions in the educational realm, as the 20th-century development of laicism meant the closing of schools where religious and secular subjects were taught together.[105] We see that the policy and reality of religious education differ; though there is compulsory secular "religious knowledge and ethical" education, it is arguably not very secular. The course is supposed to teach about "ethical behavior," however because of the overwhelming influence of Islam in Turkish society, this becomes an Islamic ethics course.[106]

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99 Caroline Ifeka. "Ethnic 'Nationalities', God & the State: Whither the Federal Republic of Nigeria?" 2000:452, 27:85, *Review of African Political Economy*, 450-459.

100 Ajah, *supra note* 95.

101 Oduntan Jawoniyi. "Rethinking the Religious Education Curricula in Nigerian Schools." 2009, 22:2, *Journal for the Study of Religion,* 63–86.

102 Achmad Asrori. "Contemporary Religious Education Model on The Challenge of Indonesian Multiculturalism." 2016:261, 10:2, *Journal of Indonesian Islam*, 261-284.

103 Mohamad Yusuf and Carl Sterkens. "Analyzing the State's Laws on Religious Education in Post-New Order Indonesia." 2015:105, 53:1, *Al-Jami'ah: Journal of Islamic Studies*, 105-130.

104 Mohamad Yusuf. *Religious Education in Indonesia: An Empirical Study of Religious Education Models in Islamic, Christian and Hindu Affiliated Schools.* Interreligious Studies, Volume 10. Zürich: Lit, 2016.

105 Çayır, *supra note* 90.

106 Muhammet Fatih Genç. "Values Education or Religious Education? An Alternative View of Religious Education in the Secular Age, the Case of Turkey." 2018:1, 8:220, *Education Sciences*, 1-16.

As can be inferred from this discussion about education, the political and social realities of secularism diverge drastically. This is exhibited in all three countries; while the state might legally support secularism, religious influences, biases, and norms abound in the social realm. Viktorahadi and Ziaulhaq denote Indonesia's approach as "non-confrontational governance of religious diversity," suggesting that there is a hesitance to state regulation of religion. This highlights the distinction between positive state involvement ("positive accommodation"[107]) and the slippery slope into negative state hegemonic control.[108] Additionally, Indonesia has experienced much violence between Muslim and Christian communities, involving ethnicity as well as religion. In the 18th century, Dutch colonists implemented separation of "migrant" Chinese and "native" Indonesians, with more economic opportunities given to the Chinese (majority Christian) residents.[109] This bred much resentment among ethnic groups, with the ethnic "otherness" reinforced through religious belief. This is similar to Orhan's opinions on the negatives of religious involvement in Turkey, with Islam being construed as an irrefutable characteristic of national identity.[110] Essentially, Turkey's political commitment to secularism serves to *keep* religious minorities from gaining support and recognition, while reinforcing Muslim ideals with no means for recourse for those with diverse ethno-cultural practices.[111] Tar and Shettima agree on this point in the context of Nigeria, stating that the state should be protected from religion's negative effects.[112] While Indonesia's incorporation of religion is viewed as a positive, this is not the case with the other two countries.

To bring our discussion back to moderate secularism, we can see that some of the most significant conflicts in these countries regard the issue of individual vs. collective rights. Asrori concludes that policies will always reinforce power imbalances, however, Modood would most likely add to this assertion that unequal policy is not always a negative if it provides *equitable* provisions and rights to support minority religious groups.[113] Though Indonesia especially meets some of Modood's moderate stipulations, such as religion as a public good and the state bringing out the public good elements of religion, Modood's overall "Western European" construction of moderate secularism seems incompatible within these non-Western contexts. There is no "national church,"

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107 Tariq Modood and Thomas Sealy. "Secularism and the Governance of Religious Diversity." *GREASE*, 2019.

108 R. Viktorahadi and Mochamad Ziaulhaq. "The Evolution of the Concept of Secularism Towards Its Encounter with Multiculturalism." 2021, 1, *Jurnal Iman Dan Spiritualitas*, 536–41.

109 Saptono Putro, Ananto Aji, Edi Kurniawan, and Fitri Amalia Shintasiwi. "From Assimilation to Pluralism and Multiculturalism Policy: State Policy Towards Ethnic Chinese in Indonesia," 2019.

110 Özgüç Orhan. "The Paradox of Turkish Secularism." 2013:43, 4:1, *Turkish Journal of Politics,* 29-49.

111 Raymond C. Taras. *Challenging Multiculturalism: European Models of Diversity*. Edinburgh, Edinburgh University Press, 2012:301.

112 Usman Tar and Abba Gana Shettima. *Endangered Democracy? The Struggle over Secularism and Its Implications for Politics and Democracy in Nigeria*. Discussion Paper / Nordiska Afrikainstitutet 49. Uppsala: Nordiska Afrikainstitutet, 2010: 18.

113 Asrori, *supra note* 102.

or even national mosque, in Indonesia or Turkey that can "[belong] to the people/country"; it would also be difficult to argue that state and religious entities in all three countries have "mutual autonomy," as these institutions are quite entangled in both legal and social capacities.[114] Nigeria's approach to positive public accommodation of religion is extremely hesitant, and underscores a circumstance in which it might not be viable or safe to attempt to promote religion as a public good. However, Nigeria does house a National Mosque and National Christian Center run by the state.[115]

Surprisingly similar to Indonesia, Turkey's strict secularism is moving away from a distinct political separation of religion and state in all political, legal, and social affairs and incorporating Modood's politics of recognition. Sevinc et al. argue that Turkey is striving in the present day to be both secular and at the same time tolerant of Islam and other faiths; this strongly embodies the values of moderate secularism.[116]

To summarize, there are many clear differences in the secularisms implemented by Indonesia, Nigeria, and Turkey, with some shared commonalities: notably, that it is almost impossible to separate religion from the structure of political governance. None of these countries perfectly align with Modood's features of moderate secularism, however secularism in all three countries is moderated and impacted by religion, no matter the degree to which the state intentionally tries to separate them. This provides opportunities for state-led positive accommodation of religion, but can also lead to imbalances of power and disregard of minority rights if state intervention is not intentional and equitable.

V. DISCUSSION

Christianity in the West has been subordinate to economic and political development throughout the 20th century. However, Christianity still underpins the European societies in our study, as it is a strong cultural backdrop of European nations.[117] There seems to be much truth in the critique by scholars that secularism is developed to organize religious diversity into a single-religion, Christian domain.[118] This construction of

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114 Chang-Yau Hoon. "Putting Religion into Multiculturalism: Conceptualising Religious Multiculturalism in Indonesia." 2017, 41:3, *Asian Studies Review*, 476–93; Tariq Modood and Thomas Sealy, *supra note* 3; Murat Somer, "Moderate Islam and Secularist Opposition in Turkey: Implications for the World, Muslims and Secular Democracy." 2007, 28:7, *Third World Quarterly*, 1271–89.

115 Olumuyiwa Olusesan Familusi. "Between Theory and Practice: An Appraisal of the Place of Religion in the Constitution of the Federal Republic of Nigeria." 2019, 29, *Ibadan Journal of Humanistic Studies*, 29, 147-164.

116 Kenan Sevinc , Ralph W. Hood, and Thomas Coleman. *Secularism in Turkey*. Edited by Phil Zuckerman and John R. Shook. Vol. 1, Oxford University Press, 2017; Geoffrey Brahm Levey, "Secularism and Religion in a Multicultural age" in eds. Geoffrey Brahm Levey et Tariq Modood, *Secularism, Religion and Multicultural Citizenship,* Cambridge, Cambridge University Press, 2009.

117 Weiqian Xia, "Christian religiosity, Religious Nostalgia, and Attitudes Toward Muslims in 20 Western Countries", 2022, 37:1, *Sociological Forum*, 1414-1435.

118 Rajeev Bhargava, "How Secular is European Secularism", 2014, 16:3, *European Societies,* 329-336.

secularism was imported to the European colonies. Secularism's link to the legacy of colonialism associated with Christianity is itself a cause of tension in the Muslim countries in this paper. The two groups of countries demonstrate the difference in discourse strategies on individual, implicitly religious rights. Individual rights are relevant in the political and secular discourse because they support a reality closely related to the nation-state. However, the discourse on Muslim countries only provides meaning within the believer's religious reality, as Islam establishes a universal religious relationship (the umma) that surpasses affiliation to the ideas of a nation-state. The Muslim discourse has a limited impact on the relationship between the triangle of people, state, and religion in the European countries, while the Muslim countries must balance between the two discourses.[119]

Religion, legal rights, and political and economic institutions have been separated distinctively different in the European countries and the Muslim countries. In the European cases, the character of the welfare state influences the practice of secularism. Today, European countries are concerned about whether Islam is compatible with liberal values and the development of parallel communities along religious lines. Reservations about multiculturalism rest mainly on a conflict between the entitlement of special rights to minorities and the sustainability of the welfare state and a liberal society. The European countries expect Muslims to step forward in a way that is perceived as secular in the public sphere and leave religion to the private sphere if they want to be recognized as legitimate partners in the public debate.[120]

Islam holds a bigger range of stipulations than Christianity[121], as it provides instructions for the organization of societal institutions. This is particularly evident in the political sphere and educational institutions in the Muslim countries in the study. While France banned any religious teaching in state schools, and similar schools in Denmark and the UK formulated "secular" presentations of religious diversity, confessional teaching in the Muslim countries is custom. In the Muslim countries, religion has been the scene of conflicts between secular and religious teaching. These arguments demonstrate the sensitivity of religion and indicate the huge challenge societies face to balance institutionalized secularism and more dogmatic religious practices and beliefs. In the political sphere of the Muslim countries, Islam also plays a dominant role. as political parties identify themselves with Islamic values. In the European countries, politics and religion are officially separated, but gradually political parties across ideological divisions have presented themselves as guardians of a Christian culture. In both settings, the political culture provides opportunities for state-led positive

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119 Brian Jacobsen, "Muslimsk kommunikation paa internettet" (Muslim communication on the internet) in edt. Lise Paulsen Galal; Inge Liengaard, *At vaere Muslim I Danmark (To be Muslim in Denmark),* Copenhagen,Forlaget Inis, 2003:123.

120 Garbi Schmidt, "Noerrebro og det Muslimske" (Noerrebro and the Muslim images) in eds. Marianne Holm Pedersen; Mikkel Rytter*, Islam og Muslimer I Danmark, Religioner, identitet og sikkerhed efter 11. September,* Museum Tusculamus Forlag, Copenhagen, University of Copenhagen, 2011.

121 *ibid*

accommodation of religion, but also imbalances of power and disregard for minority rights.

Modood emphasizes that religion is a public good and a central element of secularism.[122] Our study confirms that religious organizations in all the countries in our study engage in social partnerships with the state, providing various welfare provisions ranging from the educational sectort to care services and ceremonies that are ingrained in national cultures. Importantly, religion builds social capital. In Indonesia, religion is believed to install ethical values across religious denominations as the foundation for society. In Denmark, the welfare state is commonly assessed to be based on secularized Christianity and to form the civic values of democracy: solidarity and egalitarianism.[123] Even Habermas, who is critical of granting religious communities any special rights, states that " it must be acknowledged that religious traditions can be the source and carrier of important values that neither the democratic state nor secular philosophers or worldviews can produce themselves.[124] However, the social capital gained from religion can easily change face and be employed in counterproductive ways. All of the countries in this study demonstrate a significant intertwinement of religion and nationalism. Weiqian Xia talks of nostalgia for the past, with Christianity acting as a strong social, cultural, and political backdrop of the culture of the society.[125] Institutionalization of the majority religion makes it a central part of national identity, which may accentuate boundaries with the "other"[126] and cause ethno-cultural, including religious, fragmentation and distrust among the majority and minority religious groups.

This leads us to the central inquiry of our study: The relationship between multiculturalism and secularism. The development of the interrelationship between secularism and multiculturalism in particularly the European, but also in the Muslim, countries has increasingly diverted from the assessment by Charles Taylor that these concepts are converging and that multiculturalism and secular rejection of traditional practices of religions upheld each other.[127] Christians and Muslims increasingly highlight their differences. The intertwinement of the majority religion and nationalism has undermined tolerance of the "other" and their autonomy. While the general public in the European countries fears that multiculturalism will erode existing national identities,

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122 Modood, *supra note* 27.

123 Mouritsen,*supra note* 57:81.

124 Schweitzer, F. "Pluralism of Religions or Pluralism based on Neutrality?", in eds Aslan, E., Ebrahim, R., Hermansen, M. *Islam, Religions, and Pluralism in Europe*m Wiener Beiträge zur Islamforschung Springer VS, Wiesbaden, 2016:105. https://doi.org/10.1007/978-3-658-12962-0_7

125 Xia, *supra note* 67:1415.

126 Roger Friedland, "Money, Sex, and God: The Erotic Logic of Religious Nationalism",2002, 20:3, *Sociological Theory*, 381-425. Richard Alba, "Bright vs. Blurred Boundaries :Second-generation Assimilation and Exclusion in France, Germany and the United States", 2005, 28:1, *Ethnic and Racial Studies*, 20-49.

127 Carle, *supra note*: 68.

in the Muslim countries secularism is associated with the fear that Western ideology will crush local Muslim cultures

We have extended our study to non-European Muslim countries in an effort to employ Modood's model of moderate secularism as a universal model. Critics of secularism often claim that it is merely a Christian way of organizing the practice of religion in a society.[128] The restriction of limiting one's faith to the private sphere clearly contravenes essential practices of Islam. By utilizing moderate secularism, we allow a much less stringent definition of secularism. In this study, the presence of a state religion, the level of state support, including financial, of religious communities, the role of religion in the educational system, and the perception of religion as a public good greatly vary between the countries. These differences seem acceptable within the proviso of moderate secularism as formulated by Modood. The critical issue is the securement of mutual autonomy of faith communities rather than mutual exclusion or one-sided control. The European countries' acceptance of this condition is reckoned through the lenses of secularism, while the approach of the Muslim countries is established from a multicultural perspective. From a European perspective, a recognition of Muslims as a social group may induce a generalization of Islam as an obstacle for not only cultural but also structural integration[129] that overlooks the constraints of socioeconomic explanatory factors, including often-limited educational attainment for non-Western immigrants (of whom many are Muslims), and lower participation in the labor market than the general population.[130]

The "Mohammad crisis" in Denmark and the confrontation of pragmatic vs. dogmatic Muslims as described by Orenstein also demonstrates the complexities of "fitting" multiculturalism into secularism through institutional compromise. There are distinct conflicts between the protection of individual (e.g. gender expression) rights and collective rights to practice religion that are in opposition to values of individual expression.

Subsequently, the European persistent commitment to their perception of secularism contravenes Modood's model. From this perspective, we agree with Lægaard's hesitations about the feasibility of the model, as Modood fails to clarify how specific religious rights can be employed without breaching fundamental secular principles of the European societies.[131]

Modood 's model of moderate secularism seems not to correspond with the political and cultural reality in any of our case studies. The elevation of the Muslim faith as an essential marker of identity, individually, and nationally, and as an important player in the political sphere, has marginalized minority religions, particularly Christians, in those

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128 Graeme Smith, *A Short History of Secularism*, London, I.B. Tauris & Co., 2008.

129 Jack Citrin; John Sides, "Immigration and the Imagined Community in Europe and the United States", 2008, 56:1, *Political Studies*, 33–56.

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countries. This reality plays into the hands of those who claim that religion inadvertently leads to conflicts when religious groups emerge as individual social groups with diverse political claims.

VI. CONCLUSION

The practice of secularism is vastly diverse, not only in the comparison between European and Muslim countries, but also within the two groups of countries. The understanding of secularism is constantly reflecting changes in the demographic compositions of populations, and the economic and political developments leading to what is deemed moderate secularism. While ethnic diversity and colonialism have had profound impacts on the understanding of moderate secularism in the Muslim countries, the realization of moderate secularism in the European countries has been severely challenged by the arrival of recent Muslim immigrants. However, irrespective of denomination, the majority religion in each of the six countries forms a dominant backdrop of the national identity, and religion is an important actor in the provision of public goods.

Our study contravenes the thesis that secularism and multiculturalism are converging. The European countries continue to accommodate the demands of the Muslim community from a secular perspective, and support for multiculturalism is fading. In the Muslim countries, secularism is weakened as Islam gains more influence in state institutions and politics. These findings in their own ways undermine the main objective of moderate secularism as outlined by Modood: mutual autonomy of majority and minority religions. Our study also lays bare the attitude of the public as a component of moderate secularism's implementation. This was generally not taken into account within Modood's model of moderate secularism, and we find that this is a serious flaw. Overall, Modood's model is very conducive to localizing various variables essential for an analysis of moderate secularism, serving as an academic model outlining the "ideal" practice of moderate secularism. However, its contribution to studying the practice of secularism is flawed due to the disparity between political realities and the stipulations of the model.

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