FROM EXCLUSIVISM TO PLURALISM:

A REFLECTION ON EUROPEAN RELIGIOUS MINORITIES[1]

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Abstract: This paper reviews the religious diversity theory in the writings of Hick, Legenhausen and Netland, among others. It distinguishes two main approaches to religious diversity, pluralism and exclusivism, and examines their negative and positive application in the current situation of new minorities' management policies. Drawing on current praxis the negative consequences of religious minorities' disintegration processes are identified. The paper argues for the need to develop further actions that could effectively accommodate minority´s religious identities, in order to build a common and shared framework, with a certain degree of flexibility to be able to adapt to future social and cultural changes.

Keywords: Exclusivism; Integration Policies; Minorities; Pluralism; Religious Education.

Summary: I. Introduction; II. A theoretical overview of exclusivist perspective; III. A theoretical overview of pluralist perspective; IV. Integration policy offer – Pluralist or exclusivist? V. Conclusion; VI. References.

I.   INTRODUCTION

Throughout the history, religion and religious-like beliefs helped people to adapt and gather natural resources and altogether with science, shaped the modern world. Modernization undermined the social significance of religion and was supposed to lead to a decline in religious beliefs (Wilson, 1966). However, such a forecast was heavily criticized, since it mainly referred to the dynamics of Western European Christianity transformation (Luckmann, 1991). In fact, in a global perspective, the disappearance of religion due to modernization is unlikely to occur in the near future (Urrutia Asúa, 2016). Furthermore, the current state of art proves that religion has by no means disappeared from the European public spaces and the resurgence of some beliefs, such as Islam, has stimulated a large political and social debate on religion´s role and influence inside the European societies. Whereas the new emphasis on religion, it has to be specified that the coexistence of different religions together was historically problematic. As Kymlicka aptly points out: "It is important to recall that Western Europe and its colonial settler states were deeply scarred by centuries of religious conflict between Protestants and Catholics. These conflicts often left societies deeply divided between a victorious and hegemonic majority whose religion implicitly or explicitly infused public institutions, a distrusted and a marginalized minority whose religion was either ignored or viewed with

suspicion"(Kymlicka, 2009:3). Consequently, one conflict seems over (Protestants and Catholics) and a new one emerged, related to the question of Islam in the West. Islam became a new other for the western democracies, marginalized and viewed with suspicion.

In relation to this, the resurgence of a new global conflict was advocated in the early 90s. During this time Huntington pioneered to forecast a new conflictual scenario for humanity to face in the years to come. He stated that "the fundamental source of conflict in the new world would be cultural and between civilizations". Furthermore, the conflict will dominate the global politics and "the fault lines between civilizations will be the battle lines of the future" (Huntington, 1996:6). Since the divides would be mainly cultural, it will separate civilizations from one another on the bases of cultural and religious differences. These differences, according to the author, are real and fundamental. Moreover, they are the product of centuries of historical practices. Among different cultural differences, religion is assumed to be the most important one. Huntington argues that in the contemporary world, religion moved in to fill the gap left behind by the separation of people from longstanding local identities and often took the form of fundamentalist movements (Huntington, 1996). Although, there are many critics of Huntington´s theory "it is in relation to Islam that… [his] thesis has found the greatest resonance and has provoked the most heated debates"(Casanova, 2011: 252). Tragically, the September 11th attacks in the United States and the following terrorist attacks in Europe have been seen as a confirmation of Huntington´s theory of clashes: between Islam and the West.

Today, the terrifying terrorist attacks that keep on taking place in Europe place a new emphasis on the faith issues of religious minorities. This increased challenge for democratic societies makes the debate on religious minorities' accommodation balance between exclusivist and pluralist views/approaches. The former raises serious questions in relation to the compatibility of Islam with Western values and advocates for the exclusion of religion from the public sphere, exclusion of religious instruction and clothing from public education. The French religious education and assimilationist model is considered a relevant example of the exclusivist approach and it is discussed in the paper. In fact, it excludes particularly Islam and it tends to explain the violent or radical behavior of some elements of this religious belief. The latter, pluralist approach, asserts the positive value for many or most religions. It advocates for policy improvements that could include participatory and inclusive instruments, to value more the cultural and religious diversity that could lead to a proper inclusion and a sense of belonging. There has been substantial research undertaken on "reasonable accommodation" instrument (Day and Brodsky, 1996; Alidadi, Bader and Vermeulen, 2013; Lefebvre and Beaman, 2014; Ruiz Vieytez, 2010) as a possible solution to religious diversity accommodation and which will be examined later. In the particular case of Europe, a proper pluralistic approach to integration is not yet fully implemented; there are countries that have some segmented experiences on "accommodating" religious pluralism. Such experiences vary from religious education to integration models and can serve as examples of pluralist policies which aim, to some extent, to accommodate the religious diversity in general and Islam in particular. A relevant example of such mechanisms is the example of the

religious education in public schools in Spain and education and integration of religious pluralism in the Netherlands. Both examples are brought into discussion due to the fact that they could lay the path towards the development of a "reasonable accommodation" of religious identities, with a common and shared framework, with a certain degree of flexibility to be able to adapt to future social and cultural changes and for the benefit of both religious minorities and European society as a whole.

In this context, the current religiously rooted clashes emphasize the need to examine the issues of religious diversity anew. To start with, in rethinking it, the first task is to revise the theoretical framework of two main approaches: exclusivism and pluralism and then re-examine their applications in the current situation of new minorities´ policies.

II. A THEORETICAL OVERVIEW OF EXCLUSIVIST PERSPECTIVE

There is almost no state today without at least one minority within its territory. Although many minorities are present in one territory for a long time, the so-called national (old) minorities' co-habitation with the hosting society was not always peaceful. Many social, political and armed conflicts characterize this relation. In this scenario, the new minorities came into the debate to reemphasize the need for recognition, non-discrimination, equal rights and cultural and religious diversity accommodations.

Different responses have been used to accommodate diversity, most of which is influenced by a domestic political tradition of a "majority versus minority" perspective (Ruiz Vieytez, 2007). In this way, majorities rule and impose their integration policy perspective over minority groups. In relation to this, Kymlicka repeatedly shows that the "inherited systems of governing religious diversity contain rigidities and hierarchies that lock-in privileges for older Christian (and sometimes Jewish) religions, while putting up arbitrary barriers to other religions, particularly those practiced by immigrant groups and especially on Islam" (Kymlicka, 2009:4). These restraints have been used to advocate for social cohesion and harmonization but in fact, led to marginalization and exclusion.

In the particular case of religious minorities, there has been little public concern on their religious accommodation needs in Western Europe. They were usually regarded as "others" that, sooner or later, should leave, assimilate and acquire the majority´s values, customs, and traditions. When this reality became more visible then it was clear that the Western tradition, most of the time, neglected and denigrated the claims of religious minorities. Such experiences are rooted in the exclusivist approach that tended to be used by majorities in relation to minorities or religious other.

The research on exclusivism is primarily concerned with justifying the role of a one and only truth in religion as an absolute. To put it in a nutshell, exclusivism in regards to religious diversity denies any form of pluralism. It dismisses the idea that all beliefs, or at least the "major ones", are the same in some important respect (Netland, 2001:9). Because of this, arguably exclusivism represents a default view in several religious traditions (Burton, 2010). For example, the earliest Buddhist and Christian sources prominently feature staunch criticisms of various rival teachings and practices as,

respectively, false, useless or harmful (Tuggy, 2015). Criticizing and questioning the other faith was used, most of the time by exclusivists, to ground the truth of their religion.

Followers of an exclusivist approach can be found amongst several religions, such as Christians, Muslims, etc. all being biased by their own religious beliefs and advocating for their one and only religious universality. From one side, Christians are claiming that salvation is offered only through Jesus Christ that represents the only Savior and the only way to God. Alike powerful exclusivist opinions are to be found amongst Muslims as well, that consider that "There is no God but God and Muhammad is his prophet" (Ghandour, 2014). Moreover, many Muslims claim to be the only ones who shall enter Paradise, based on the Quranic teachings which mention that all Kuffar (infidels or non-Muslims) will go to hell. In addition, "since Muslims are required to establish equilibrium between this world and the principles of religion, they must live their lives here guided by [Islam] religious principles and the idea of the Beyond" (Ahmed, 1993:29). As result of these both (exclusivist) views, there is just one center and there can be just one unique and "universal" truth.

A scholar that heavily defended exclusivism in his works is Harold A. Netland. He emphasizes that salvation is settled exclusively through Jesus Christ and that such a saving dimension does not exist in other religions. Netland states that "exclusivism maintains that the central claims of Christianity are true and that where the claims of Christianity conflict with those of other religions the latter are to be rejected as false"(Netland,1999:77). Panikkar´s research on exclusivism raises a similar idea and he argues that the exclusivists hold the view that only his/her religious tradition contains the "absolute truth" or it is a valid "truth claim" and that all other existing and previously existing claims possess neither valid nor legitimate "truth claims". This claim, he argues, has "a certain built-in claim to exclusivity" (Panikkar, 1998:534).

In the particular case of Christian exclusivists, they characteristically consider that God has revealed himself definitively in the Bible and that Jesus Christ is the unique incarnation of God, the only Lord and Savior. In addition, "salvation is not found in the structures of other religious traditions" (Netland, 1999:10). In the same line is the view expressed by Crafford´s research on exclusivism, who mentioned that the exclusivist position holds that salvation is only possible through confession and surrender to God in Christ (Crafford, 1995). The lack of salvation in the other religious traditions proves to Netland, and some other authors, the exclusivity of Christian faith, although he accepts the existence of other faiths with which Christianity relates, such as Islam.

As mentioned earlier, Islam has also an exclusivist perspective which is not only spiritual but also refers to the Muslim daily leaving "Islam…prescribes behavior in every part of human life and action… Islam, in effect, is asserted to be a complete way of life designed to introduce the consciousness of the divine in every moment of daily life and every Muslim is accountable for all his or her actions within it" (Maréchal et al, 2003:6). In this way, the broad and absolute presence in every part of life advocates the Islam as the true religion and only way of life. Some authors, as explained further, founded their

point of view looking at the relation and differences of their religion compared with the others.

Looking at the relation of Christianity with other religions Netland notices that the religious ultimate, the human predicament and the nature of salvation are differently, even contradictorily, pictured by the Buddhist, Muslims, Hindus and Christians. While he acknowledges that they have their own specific claims, Netland does not see it possible that all religious claims can be right. Once this incompatibility is acknowledged, he starts questioning "Which, if any, is the correct one?" (Netland, 1999:77). In this way the author is excluding from the start, the possibility of a plural existence of two or more divine truths. While the author starts looking for a correct answer to his outstanding question, he points out that "not all of the claims of the various traditions can be true. Some must be false" and, in order to substantiate his statement he considers that "it has traditionally been held that the Muslim and the Orthodox Christian cannot both be correct in their respective beliefs about the identity of Jesus" (Netland, 1999:78). A similar thought has Westerlund and his research on exclusivism leads him to the statement that "exclusivism denotes the idea that only one religion or religious denomination is true and that the beliefs and practices in other religions, therefore, are false to the extent that they are in conflict with this religion" (Westerlund, 2003:266). In this way relying on old beliefs, the exclusivist approach is built on, emphasizing the historical quarrel among different religions.

The conflicting nature of beliefs leads Netland´s analysis to a solution. According to him, "where the claims of the Scripture are incompatible with those of other faiths, the latter are not to be accepted as truth" (Netland, 1999:80). This means that what is not according to the Christian religious tradition is false and has to be neglected, avoided and rejected, and this relates the inner exclusivist views of the author. Similar opinions are made by other authors, among which is Kärkkäinen, who introduced the terms of ecclesiocentrism, Christocentrism and theocentrism (Kärkkäinen, 2003). According to the author, the centrism of Christian beliefs makes the faith exclusive. In this way, both Netland and Kärkkäinen advocate for the exclusivist approach and both points of view are heavily anchored in Christianity.

Additionally, both authors agree to replace the concept of exclusivism by a more neutral term such as "particularism" and "restrictivism" (Tuggy, 2015), as the original term had a strong negative connotation. Such an intention was due to the criticisms that the authors received and the proposal for a softer concept was intended to increase the acceptance of their point of view. While particularism points out the specificity of different religions, being used in exclusivist terms it maintains the idea of one religion being better than the other. The same happens with "restrictivism" that keeps on emphasizing that imposing and eliminative character. The effort to "polish" the concept might not help properly as it still keeps the mark of the original meaning: to make a distinction between the different categories, to separate and advocate for a one and only supremacy.

III. A THEORETICAL OVERVIEW OF PLURALIST PERSPECTIVE

Differently, from exclusivism, the pluralism ideal is mostly used for asserting the positive value for many or most religions. Predominantly, it embraces the idea that a peaceful co-existence of different religions is possible. Furthermore, the pluralistic approach to religious diversity advocates for an egalitarian attitude and a wide acceptance towards other religions, and considers that, within bounds, one religion is as good as any other.

The pluralist approach came into the contemporary panorama as a natural consequence of increased diversity and was characterized by more and more plural societies - in linguistic, cultural and religious terms (Ruiz Vieytez, 2007:9). Furthermore, "pluralism is both a fact and aspiration… it refers to the reality of religious diversity in democracies and a commitment to engaging that diversity in ways that support citizens´ religious freedom and the common good" (Soper et al. 2017:229). In this way, the plural realities gave birth to different elaborations of terms and meanings but with one outstanding characteristic: contextual bias. In some contexts, religious pluralism means an informed, tolerant and appreciative or sympathetic view of the various religions. While in other contexts, religious pluralism is a normative principle requiring that people of all or most religions should be treated the same (Tuggy, 2015).

It is necessary to underline that pluralism came in to reinforce the changes that the democratic societies faced as well as advocated the emerging needs of new cultural and religious institutions. In this way the changing landscape of church-state relations is unquestionable in the last decades and "there was seen a growth in the fact of pluralism throughout the world…" followed by an "overall decline of religious affiliation and activity in western democracies, but also the emergence of new movements and resurgence of older ones" (Soper et al. 2017: vii). These contrasting happenings, the decline from one side and the emergence from the other, draw us back to the question and place of religion in some people´s lives as well as the question of religious accommodation in pluralist societies. As it has been mentioned earlier, religious diversity accommodation requires from a real democracy to be equipped with some fundamental values to be obeyed, such as respect and tolerance towards religious otherness. Although the religious pluralism is a reality for many European states, many of them still struggle for an appropriate religious accommodation policy. Due to this situation, there is an increased need to look at the existing research in the area of pluralism with the main aim to lay the path for "new" accommodative experiences of the religious minorities.

To start with the work of J. Hick can help. Hick was an advocate for a tolerant view towards various religions. He displayed a strong sympathy for the pluralistic ideal and considered that no religion stands out above the rest, and none can claim to be the only context for authentic religious experiences. The different religions are, as Hick defined them, different responses to the same absolute ultimate (the Real). In Hick´s work, "the Real" was used to refer to the ultimate in different religions and sometimes he used the following synonyms: "the ultimately Real" and "ultimate Reality" or even simply "the Ultimate" or "Reality" (Hick, 1989). For the author, the Real or the truth has

multiple faces and he argued that what we see represents just our subjective and historically influenced views. Correspondingly, what is true for one might not be true for other religions as they have their proper, genuine truth. To put Hick´s idea in a nutshell, one truth/religion is as legitimate as any other. In this way, the author not only recognizes the plurality of the Real but he also argues that each person taken separately has only one and unique Real. Another author that is aware of the religious pluralism and tried to picture the future relation between religions is Race. He recognized that "the future of Christian theology lies in the encounter between Christianity and other faith" (Race, 1983: xi). Due to several factors, the encounter in the European context was inevitable and because of this, it had to be tacked by researchers, recognizing and then trying to provide solutions. Although the recognition of plurality of religious coexistence, Hick uses the Real in singular form, in order to underline the uniqueness of each religious view, because he "considered that there cannot be a plurality of ultimates but only one" for each person and who can bear different names (Hick, 1989: 249). In this regard, Amaladoss criticizes such an opinion, he observes that "to understand various religions in terms of the various names they give to God, all referring to the same reality, is rather simplistic and nominalistic". Later on, the author concludes that such a view "does not take religion seriously" (Amaladoss 1992, 23). To clarify this critic, Hick´s work provides some answers. More exactly, the "presence" of the Real in different religious practices consists in the "availability of information, from a transcendent source, that the human mind/brain is capable of transforming into what is called a religious experience. And, similar with the awareness of the physical world, the environing divine reality is brought to consciousness in terms of certain basic concepts. These are, first of all, the concept of God, or of the Real as personal, which presides over the various theistic forms of religious experience; and second, the concept of the Absolute, or of the Real as non-personal, which presides over its various non-theistic forms" (Hick, 1989: 244). In this way, the author emphasizes the subjective interpretation of the Real by human nature as well as their biased opinion in understanding the transcendent, due to which "the adherents of the major religious faiths experience the Real through they're varying culturally shaped lenses" (Hick, 1989: 240).

If it is claimed that all religions have the same Reality as their foundation, then one starts questioning, why it is understood in such vastly different ways. In this regard, Vivekananda explains this through the differences in the natures of those who perceive the Reality "We cannot deny that bodies acquire certain tendencies from heredity, but those tendencies only mean the physical configuration, through which a peculiar mind alone can act in a peculiar way. There are other tendencies peculiar to a soul caused by its past actions" (Vivekananda, 2015: 21). Emphasizing the cultural influence underlines that the adherents in most of the religious beliefs have only one center and experience the transcendent through the perspective of their own religious affiliation.

While acknowledging this situation, Hick explored his pluralistic hypothesis "that the great world faiths embody different perceptions and conceptions of, and correspondingly different responses to, the Real from within the major variant ways of being human; and that within each of them the transformation of human existence from self-centeredness to Reality-centeredness is taking place. The divine process of

transformation inside various religious traditions are seen by Hick as alternative salvation "spaces" within which, or "ways" along which, men and women can find salvation/liberation/ultimate fulfillment" (Hick, 1989: 240). In this way, the author´s call to reflect and accept the reality-centered transformation is the main premise that leads to the acceptance and peaceful co-existence of the religious plurality. In relation to the pluralists, Kärkkäinen points out that they consider that other religions have the same legitimate means of salvation. The same author concludes that "pluralism involves both a positive and a negative element. Negatively, pluralism categorically rejects exclusivism. Positively, it affirms that people can find salvation in various religions and in many ways" (Kärkkäinen, 2017: 3). While underlining the positive and negative aspects of pluralism, it should not be taken for granted that religious pluralism can be embraced easily, on the contrary, it requires a significant internal work of believers on understanding the doctrinal claims of their faith and how they see the external world. These seem the basic premises for the acceptance of religious pluralism. In fact, it should be no problem to accept plurality, as according to Hick the religious affiliation is a "birth accident that passes on from one generation to another through the historical channels" (Hick, 1989: 2).

If these premises are understood and accepted then the peaceful co-existence of different religious beliefs might be indeed possible. Nevertheless, for this change to occur the author underlines some necessary milestones. First of all, he suggests that the belief in the transcendent must start from the new acknowledgment of religious plurality and conceptual relativity. This means that religious beliefs must be seen as containing an immense variety of forms, and this vast and multifarious field of human faith constitutes our variously transparent and opaque interface with a mysterious transcendent reality. In order to achieve this, the intellectual challenge, according to Hick, is granting to others a premise on which one relies oneself and in the equality of other religious experiences that in the end leads to the intellectual Golden Rule being obeyed (Hick, 1989: 9).

Secondly, Hick proposes to go beyond the dominant self-understanding of each religious tradition and to overcome the classical belief to be regarded as uniquely superior to the others. The proposal to challenge the past and present stereotypes and make one step further to acceptance, mutual understanding, tolerance, and respect represents a proposal for change or transformation of our classical and old views that could lead to the accommodation of all religious belief in the modern democratic societies. And last, he calls for a genuinely pluralistic change in the religious world by means of interpretation. Acceptance and tolerance are directly linked to understanding and interpretation. If we start interpreting the world as many and with differences as Hick rightly says "…deemphasize its own absolute and exclusive claims" (Hick, 1989: 3).

The three premises that Hick underlines stress the need to transform the existing views and advance altogether with the changes of the modern world in order to build a peaceful co-existence among different religions and faiths.

Other scholars, as Legenhausen builds on the idea of a hypothetical peaceful coexistence of religious pluralism. He considers, as well as Hick, that many religions are equal regarding the central value(s) of religion (Legenhausen, 2009). Although

Legenhausen shares the same pluralist ideal, he raises some criticisms of Hick´s work, calling it reductive pluralism and radical in reference to the personal transformation from self-centered to Reality-centered. The pluralism according to Legenhausen is non-reductive and it is explained by ". . . the view that each of a number of religions has unique features through which God may guide people, even if there is no common essence to all religions" (Legenhausen, 2006: 10). Later on, the author concludes that this version of pluralism (called non-reductive pluralism): ". . . is able to avoid the objections raised against liberal or reductive pluralism while maintaining an attitude of tolerance and rejecting prejudice" (Legenhausen, 2006: 13). In this way, Legenhausen points out the increasing problem of prejudices that, in consequence, leads to discrimination and marginalization. Moreover, he considers that: "to defend religion means to support, encourage and defend the dignity of others' faiths and practices to the greatest extent possible" (Legenhausen, 2006: 16). Although it is worth trying, he recognizes the difficulties and barriers fulfilling such a mission.

In practice, the religious pluralism seems complicated but still, there are some examples. An intention to develop a tool that could accommodate the religious diversity can be the reasonable accommodation instrument, mentioned earlier. Originally it had its origins in the Antidiscrimination Law, referring to the cases of direct or indirect discrimination, both in Canada and USA. Actually, it was first in the USA that the instrument emerged for the first time and it was in relation to the accommodation of religious demands/needs in their working environment.[3] But it is in Canada that the instrument had a greater development. As Ruiz Vieytez points out, it is Canada and in particular, Quebec where "this idea has found a fertile ground for the exercise of the competencies on migrant matters, for the recognition and preservation of the minority cultures" (Ruiz Vieytez, 2010:67). Similar to the cases in the USA, the Canadian reasonable accommodation emerged in the area of labor and related to religious needs.[4] With the sentence over Ontario Human Rights Commission v. Simpsons‑Sears the reasonable accommodation instrument consolidated and developed in Canada to reach a public discontent.

The famous Bouchard-Taylor Commission established in response to public discontent concerning reasonable accommodation, conducting an extensive consultation and formulated some recommendations to the government to ensure that accommodation practices conform to Québec's values. Among the recommendations where the

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[3] The case of Dewey v. Reynolds Metal Company, United States Court of Appeals, June 4, 1970. "Robert Dewey, an employee of Reynolds Metals Company, refused to work Sunday overtime, as required by the collective bargaining agreement between his union and employer, because his church forbade Sunday labor". http://scholarship.law.upenn.edu/cgi/viewcontent.cgi?article=5826&context=penn_law_review

[4] The case of Ontario Human Rights Commission and Theresa O'Malley (Vincent) v. Simpsons‑Sears Limited. December 17, 1985. Supreme Court used for the first time the reasonable accommodation instrument in this case. "Appellant O'Malley alleged discrimination on the basis of creed against her employer, a retailer, because she was periodically required to work Friday evenings and Saturdays as a condition of her employment. Appellant's religion required strict observance of the Sabbath from sundown Friday to sundown Saturday. Given this conflict, appellant accepted part-time work because a full-time position not involving work on Saturday was not available to a person with her qualifications". https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/101/index.do

conclusion that any secular system achieves some form of balance between the following four principles: "the moral equality of persons; freedom of conscience and religion; the separation of Church and State; and State neutrality in respect of religious and deep-seated secular convictions" (Bouchard and Taylor, 2008: 21). As it can be noted, two of the above principles define the private equality, while the other two refer to the state authority that has the power to guarantee the first two. Thus, guarantee a reasonable accommodation of the emerging needs. In conclusion both Bouchard and Taylor advocate for an open secularism that seeks to develop the essential outcomes of secularism by defining institutional structures. Such an approach seems appropriate and is a practice to be considered by the European states in order to accommodate the religious diversity.

There is no doubt that the theory and practice should go together, otherwise it is a waste of empirical evidence and theoretical efforts. As García Inda mentions the binary of empty theories and blind empirical evidence represents the main barrier for the structure of a sociological practice and thought that could lead to the development of a science capable to build up on its biggest exits (García Inda, 2001). In order to fill in this gap the theoretical overviews described earlier are exemplified in the following chapter with the examples of the integration policy offers.

IV. INTEGRATION POLICIES OFFER – PLURALIST OR EXCLUSIVIST?

The integration of new minorities has been a topic of public debate for the last few decades. This made the policymakers and practitioners plan and implement integration measures for new minorities and their descendants, and sometimes for the whole population of certain areas. In these policies, a new field emerged: the issue of religion. Consequently, the exploration of this area has taken a new importance and "many governments have transferred some policies and programs previously run by the state agencies to private, usually non-profit organization, many of which have a religious history or orientation" (Soper et al., 2017: 2) in order to supply the new demand.

Since western societies become more plural, the demand for particular services grows and the issue at stake becomes "whether or not each state will accommodate the religious needs of group differences through public finance of religious schools and/or social service organizations. This is necessary because the public aid reinforces group identities, which gives greater recognition to the fact that religious and ethnic life is lived out through community organizations" (Soper et al., 2017: 245). Although there is an increased necessity to develop such policies, the experience of European states varies.

If we look inside the European states there are different practices on religious pluralism accommodation. Some are deeply rooted in the exclusivist approach while other, to some extent, try to accommodate the religious diversity and some reasonable accommodation measures are provided. Such instruments, in the article, have been called segmented practices of accommodation and as it will be exemplified later they relate to only some segments of the policy offer, like the place of religion in the public sphere, religious education in public schools and religious clothing.

To start with, the religious education in the public school represents a good example of analysis in order to see how the exclusivist and pluralist approaches have been used in different geographical contexts. In this regard, Maréchal identifies four basic models of organization of religious instruction in public schools in Europe: a *secular* approach which refuses religious instruction (in the context of the present article it is exemplified through exclusivist approach, used by integration policy); a *plural* approach which allows teaching about different religions; a *preferential and restricted* approach which offers as well as authorizes instruction in a given religion, but privileges instruction in the dominant religion in that society; and a *culturalist and historical* approach to religion (Maréchal, 2003: 42). These models of organization can be classified or divided into soft and hard models of religious instruction´s organization based on the effect these can have on religious minorities. As the present article focus on the two extremes (exclusivism and pluralism approach) from the Maréchal models, only two (secular and pluralist) will be discussed and exemplified in the article, is considered the most relevant to contribute to the debate.

In this way, the first *secular* or *laicism* approach in regards to the religious education in the public schools it is considered exclusivist because it "consists in refusing instruction in a particular religion within the curriculum, which as state-sponsored is considered incompatible with any one religion" (Maréchal, 2003:42). A pure (hard) implementation of this model could be the example of ex-soviet union states where any religion was prohibited and excluded from the schools. Whereas in today Europe, this approach finds it's softer - pragmatic application in some policy offers that deal with new minorities´ management. In many of these policy offers, the exclusivist approach was nicely veiled inside the integrative policies. For some countries, the new minorities once arrived into the new land, it has been considered that they have to adapt to the cultural context or leave at the end of a short-term working contract. Since none of these have happened, there appeared the need to integrate the new minorities and European states, depending on their traditions, developed some offers with different degrees of restrictive/exclusive policy measures. Such measures had the main aim to harmonize the society or in other words to embrace the majority´s identity for all, or to make the "others" forget their origins, faith, and culture and adopt the hosting one.

In the particular case of public religious education, France is a good example due to the choice of the secular concept. Because of the predominance, it has within the French debate and through the uncontested principle of state neutrality in religious matter. Within such a framework, no program of studies of religion exists in the French public schools, except for the partial and indirect exposure gained in courses of general history or geography, or language of origin classes (Maréchal, 2003). As a result of this situation, in France, "the intellectualization of Islam takes place outside the family, through self-instruction when it is practicable and even more through meetings and conferences organized by associations"(Babés, 1997:137). There is an evident paradox here. First of all, the state neutrality does not conform to the people needs. Consequently, to satisfy the religious needs some parallel, not regulated and not supervised religious schooling takes place. Such a "solution" cannot be sustainable, as it reemphasizes the marginal and deprived status of the religious minority, with all negative consequences that did not wait

to appear in Franch society. But, such a situation proves that religion is part of identity construction of many individuals and therefore cannot be excluded from the integration policies. On the contrary, it should be incorporated as an integral part of such policies.

Another area of interest is the "French church-state relationship, based on the separation of religion from the public sphere" (Soper, 2017: 51), France was the first to introduce some restrictions in regards to cultural or religious clothing. An example is the French law "Loi interdisant la dissimulation du visage dans l'espace public" n° 2010-613 DC from 7th of October 2010[5], to prohibit the wearing of clothing covering one's face in public sphere. Although the ban applies to scarves, masks and motorcycle helmets, it particularly affects Muslim women who wear the Islamic veil or niqab. Due to which, the law has been commonly called the "burqa ban" or burqa exclusion.

Both of the above examples of exclusivist approach towards religious accommodation are rooted in the French assimilation model. Initially, it comes from the French ideology during the colonial time and which in the modern time started to be applied in reference to the new minorities. As Geddes states, such an approach was supposed to make the new minority equal to the rest and mainstreamed into the French culture. However, the non-discriminatory and egalitarian policy did not work as expected and rioting altogether with the terrorist attacks, revealed the divisions of race, culture, ethnicity, and religion, among migrants and their descendants. "These are seen to show that French emphasis on assimilation had not addressed serious problems of youth alienation and unemployment and that discrimination, hate, Islamophobia are important concerns. These events clearly show from one side, the profound unease at the institutional level when dealing with issues related to ethnicity, culture or religion and from another side, the disconnect between people and their political leaders" (Geddes, 2016: 48). The above examples prove that the use of exclusivist approach in integrative policy offer cannot serve as a sustainable solution for the religious pluralism and it urges to be re-considered and addressed by a pluralist approach to policy offer.

Although far from a real pluralist, inside European societies can be found some examples of countries that tried to accommodate religious diversity through different policy offers, or as has been mentioned earlier, some segmented pluralist policy offers. An example, following the previously mentioned Maréchal models, is the plural approach to religious education. This model, as claimed by the author, "tends to offer instruction in various faiths in public schools" (Maréchal, 2003: 43). Such an open space for new minorities' descendants may offer a sense of equality and belonging, and make them feel part of the majority. This commitment of the public sector comes usually through a formalized relation of state – faith kind of "social contract", which can take the form of

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[5] In its decision number 2010-613 DC of October 7, 2010, the French Constitutional Council found the law prohibiting the wearing of clothing covering one's face in public spaces constitutional, with one reservation. (Decision no. 2010-613DC du 07 octobre 2010, loi interdisant la dissimulation du visage dans l'espace public, Constitutional Council official web site (Oct. 12, 2010), http://www.conseil-constitutionnel.fr/conseil-constitutionnel/francais/les-decisions/acces-par-date/decisions-depuis-1959/2010/2010-613-dc/decision-n-2010-613-dc-du-07-octobre-2010.49711.html) The reservation applies to places of worship open to the public; in such places, the prohibition is not applicable.

an agreement signed between the state and various religions´ representatives. The main aim of this action is to provide religious education, subsidized by the state. In the particular case of religious education on Islam, "Spain and Belgium are the only countries who have accomplished it officially" (Maréchal, 2003: 43) due to which the Spanish example will be described further.

In Spain, although the state is non-confessional, it does have agreements with the Holy See and recognize some specific rights to the Catholic Church. Some rights, but not all, have been extended to other faiths such as Islam, Evangelical, and Jewish. Despite the legal status of Islam, recognized through the Law 26/1992 on the approval of the Agreement of cooperation of the State with the Islamic Commission of Spain from 10th of November 1992[6] there have been some difficulties to establish chaplains in prisons and the military and to introduce the study of Islam inside the school curricula. Moreover, the curricula for primary schools[7] was elaborated and published in 2014 but only after two years, in 2016, the Spanish government has published the new guidelines for teaching Islam in public primary education[8] altogether with secondary and high school education.[9] Furthermore, the content of the curricula points out that it was developed as a way to prevent Muslim children and youngsters from being radicalized by exposing them to a "moderate" interpretation of Islam. Whereas, the legal basis for teaching Islam in Spanish public schools is dated back inside the Article 27.3 of the Spanish Constitution from 1978, which establishes that although Spain is non-confessional, "the State guarantees to the parents the right for their children to obtain a religious and moral education which conforms to their own convictions".[10] Although this legal provision, Muslims (and Roman Catholics) have long understood this to mean that children are entitled to a religious education in public schools but it was possible only during the last years in the case of Muslims (Kern, 2016). The access to public teaching of Islam in the Spanish case, in this particular period, seems to follow the overwhelming European fear on radicalization and terrorism and not being led by the aim to develop a proper integrative policy instrument of religious pluralism.

Another country of interest in regard to religious accommodation is the Netherlands. The country is particularly well suited as an example due to the fact that

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[6] Ley 26/1992, de 10 de noviembre, por la que se aprueba el Acuerdo de Cooperación del Estado con la Comisión Islámica de España. https://www.boe.es/diario_boe/txt.php?id=BOE-A-1992-24855

[7] Resolución de 26 de noviembre de 2014, de la Dirección General de Evaluación y Formación Profesional, por la que se publica el currículo del área Enseñanza Religión Islámica de la Educación Primaria. Boletín oficial del estado. Núm. 299 Jueves 11 de diciembre de 2014 Sec. I. p. 101207 https://www.boe.es/boe/dias/2014/12/11/pdfs/BOE-A-2014-12886.pdf

[8] Resolución de 14 de marzo de 2016, de la Dirección General de Evaluación y Cooperación Territorial, por la que se publica el currículo de la enseñanza de Religión Islámica de la Educación Infantil. Boletín oficial del estado. Núm. Núm. 67 Viernes 18 de marzo de 2016 Sec. I. p. 20517. http://www.boe.es/boe/dias/2016/03/18/pdfs/BOE-A-2016-2714.pdf

[9] Resolución de 14 de marzo de 2016, de la Dirección General de Evaluación y Cooperación Territorial, por la que se publican los currículos de la materia de Religión Islámica en Educación Secundaria Obligatoria y Bachillerato. Boletín oficial del estado, núm. 272, de 12 de noviembre de 1992, p.38214. http://boe.es/boe/dias/2016/03/18/pdfs/BOE-A-2016-2715.pdf

[10] La Constitución española de 1978. http://www.congreso.es/consti/constitucion/indice/titulos/articulos.jsp?ini=27&tipo=2

"religious pluralism altogether with tolerance and multiculturalism for decades has been synonymous with the Dutch context" (Maréchal, 2003: 48). According to the Dutch Education Act of 1984, parents have the right to obtain religious education for their children in public schools. In this way, "the Dutch education act gives the right to any group of parents that wishes to establish schools based on a particular religious or educational ideology to do so. These schools supply mainstream education with their own perspective and are financed by the Dutch government. Some Muslim parents did take this legal opportunity to ensure the religious education of their children"(Shadid and Koningsveld, 1992: 104). In 1988 the first two Islamic schools were established and by 2014 there were 43 Islamic schools in the Netherlands (Dronkers, 2016: 7). Although this opportunity, the Islamic schools, according to Shadid and Koningsveld face many problems: like few Muslim teachers qualified to teach in the Dutch educational system, lacking Islamic didactics and educational materials, students coming mainly from the lower social classes etc. (Shadid and van Koningsveld, 1992). These difficulties of the schools question their proper functioning and sustainability over time but as an example of accommodation of religious pluralism in public school it is worth mentioning it and the efforts should be made to improve it. Although the above example was presented separate, this experience is a part of a broader policy on religious pluralism accommodation rooted in the integration policy of the country.

First of all, the Netherlands is a country with a longstanding reputation for its liberal attitudes toward immigrants. To many, the large Dutch Muslim population, from Morocco, Suriname, Turkey and the Antilles, is an outstanding testament to that fact (Barahimi, 2009). In addition, the Netherlands has been known worldwide for its multicultural approach to immigrant integration. Some even called it a multicultural model. The basic premise of this model is that Dutch policies have been driven by a coherent and consistent belief in the idea that the recognition and accommodation of cultural, ethnic and religious groups promote their successful integration into Dutch multicultural society (Duyvendak, 2010). However, a key trait of the Dutch "multicultural model is its tendency to institutionalize cultural pluralism in the belief that cultural emancipation of immigrant minorities is the key to their integration into Dutch society" (Duyvendak and Scholten, 2010: 41).

Additionally, the Dutch model is based on the country's tradition of pillarization or the Dutch pillarized system and encompassed the division of society along cultural and religious lines. Within this system, minorities could have their own distinct political and social organizations, which allowed them to participate in cultural life and policymaking. The main aim was to achieve social integration through preserving, respecting and empowering subcultures (Spiecker and Steutel, 2001). Even after the decay of this system, scholars claim that the Netherlands remained "distinctive" (Statham et al., 2005) from other European countries, "because it continued to encourage cultural pluralism by giving broader rights and freedoms to minority groups, including Muslim minority" (Erisen and Kentmen-Cin, 2017: 85). In these terms, the Netherlands "is viewed as a multi-ethnic country with looser requirements for naturalization" (Erisen and Kentmen-Cin, 2017: 85) comparing with other European states. Furthermore, the Netherlands is still an utmost example of a multicultural vision of integration. "The country allows

immigrants easy access to formal social and political rights while at the same time, facilitating expressions of foreigners' own cultural identity with the help of the state… Organizations and activities based on ethnic grounds are still generously supported – directly and indirectly – by the government" (Koopmans, 2007: 4).

Nevertheless, the Dutch model is not perfect. Due to which the Dutch multiculturalism has been criticized and "blamed for various adverse effects" (Duyvendak and Scholten, 2012: 268). Some authors consider the Dutch model that it "served as a policy of cultural segregation, forcing Muslim immigrants to the periphery of society where they congregate together, forming their own religious, sports and political organizations" (Barahimi and Ostowar, 2009: 76). A similar opinion has Rath. He considers the "Dutch multicultural model a product of a technocratic community of experts and policy-makers and deconstructs the ideological principles on which it was based" (Rath, 1991: 121). According to the author, there are remarkable similarities in the problematizing of some fractions of the working class and that of immigrants. He claims that both anti-social families from the "lowest social classes" and ethnic minorities "are seen by the rest of society as people with a lifestyle that deviates from that of the middle class ideal type, as people who do not adequately conform to the dominant norms of normal society behaviour, as backward people with a lifestyle of an earlier pre-industrial period" (Rath, 1991: 166). This minorities' paradigm adopted by the Dutch authorities from one hand legitimizes the government intervention on ethnic minorities and on the other hand prevent the minorities to participate due to their socio-cultural disadvantages. Particularly this leads to further "minorization" of minorities and it is due to it that ethnic minority policy failed in the Netherlands (Rath, 1991). On the same line of thought are Sniderman and Hagendoorn who claim that "the labeling of collective identities has inadvertently deepened socio-cultural cleavages in society rather than bridging these differences" (Sniderman and Hagendoorn, 2007: 269).

The analyses of the model and its critics lead to the conclusion that although there were premises for a proper reasonable accommodation of minorities, the model did not evolve and it created some parallel pillars of many religions together that did not or had little chances to interact. According to Barahimi and Ostowar, this lack of interaction paid two main negative consequences. From one side, it increased prejudices of unwillingness to integrate and increased marginalization and the communities build their own and parallel enclaves in the main society. Whereas, the growth of Muslim networks has only increased the fear of Islam radicalization and reinforced the Dutch society's perceptions about their unwillingness to integrate (Barahimi and Ostowar, 2009). As result of this, the Dutch model, although it tried to integrate the pluralistic approach, it did not yet find a perfect balance in order to accommodate the needs of majorities and minorities.

V. CONCLUSION

The negative consequences of religious minorities' disintegration advocate for the need to develop further actions that could effectively accommodate religious minority´s identities. An outstanding argument is that religion is part of identity construction of many individuals and groups and therefore cannot be excluded from integration policies. On

the contrary, it should be incorporated as an integral part of such policies. Such a path requires a change of paradigm that could slowly move the policy focus from exclusivist to pluralist with the aim to create a tolerant and equalitarian space for all religious denominations present in the plural societies and with equal premises to enjoy to its fullest and deepest extent.

In this regard, the pluralist approach seems to be a possible solution but its practical implementation still needs to be developed. Although the European states are plural, they possess only some segmented practices in regards to the religious pluralism, as it was exemplified in the article. Moreover, the lack of accommodative solutions can lead the states to face more and more unquiet situation, complex conflicts and with growing cultural clashes.

The pluralist approach has the right premises to solve these situations but it needs to be properly developed. A path to this could be the "reasonable accommodation" instrument, with a common and shared framework and with a certain degree of flexibility, to be able to adapt to future social and cultural changes. It has to be underlined that this work has to engage a multitude of actors from different levels: religious believers, policy makers, and academia. The religious leaders could contribute to solving the conflict between the pluralist ideal that all religions are equal and the self-understanding of each separate faith. Acceptance of religious pluralism seems to require a significant rethinking of how believers generally understand their doctrinal claims and the worldview of their religion. Once this is worked out then the policymakers could develop or improve the policy offers of religious accommodation. Another idea to be examined is the "proposals for institutional pluralism due to their actual impact on people's lives—for how they enable or inhibit people's ability to exercise agency and participate democratically—rather than be dismissed on the basis of their consistency with this or that abstract model of secularism" (Kymlicka, 2009: 2). Institutions, in general, and public ones in particular, have the tools to develop and implement plural accommodation policies that could lead to a better management of religious diversity (Bouma, 1999). In this regards, Bader distinguishes the government and the governance of religious diversity in the studies of a mechanism of action coordination. According to him "the perspective of governance is narrower: it includes markets by focusing on regulation, including mechanisms of action coordination and enabling non-market (self-) regulation. The perspective of governmental regulation is narrower still. It focuses on one actor, i.e. the state, and on action co-ordination by public hierarchy" (Bader, 2007: 50).

Academia, on the other side, could come with tailored models of religious pluralism accommodation considering the historical, geographical and social structure of each cultural society and that could nourish the policy proposal with the exact needs of religious minorities´ accommodation. This joint work could solve the problem of the existing gap between policy offer and religious minorities needs. Moreover, it could help to develop a constructive conception of religious tolerance. Thus, the proper pluralist approach in policy proposal can help religious minorities enjoy more the citizenship and belonging, can help to build more inclusive societies and become a revolutionary

paradigm on religious minorities´ accommodation, not just a descriptive theoretical framework.

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