The governance of religion in Europe: mapping religious accommodation in the EU

Paula M. Arana Barbier
Institución: Max Weber Institute für Soziologie, Universität Heidelberg ✉ ⓘ

Ángela Suárez Collado
Institución: Universidad de Salamanca ✉ ⓘ

ENG **Abstract.** This article analyses and presents religious accommodation as a mechanism for studying religious governance in Europe through the comparative inclusion of several religious minorities. It addresses the theoretical discourse generated by various disciplines to comprehend the issue from a multidisciplinary perspective and translate it into a more practical realm. It proposes a definition for Governmental Religious Accommodation, operationalised through proxy variables from the Religion and the State and the Global Restrictions on Religion datasets, reflecting three empirical areas of the concept (materials, practices, and rights). These undergo a Multiple Correspondence Analysis, which enables us to define and link the dimensions with their theoretical significance and categorise countries. The results illustrate the general accommodation policies of governments, identifying Portugal as the nation with the most favourable policy and Bulgaria as the one with the most restrictive policy.
Keywords: Religious accommodation, secularism, European Union (EU), religious governance.

ES La gobernanza religiosa en Europa. Un mapeo de la acomodación religiosa en la Unión Europea

Resumen. Este artículo analiza y presenta el alojamiento religioso como un mecanismo para el estudio de la gobernanza religiosa en Europa a través de la inclusión de varias minorías religiosas de manera comparativa. Aborda la discusión teórica producida por diversas disciplinas para entender el tema desde una perspectiva multidisciplinaria y traducirlo a una esfera más práctica. Propone una definición de Acomodo Religioso Gubernamental, operacionalizada a través de variables proxy de los conjuntos de datos Religión y Estado y Restricciones Globales sobre la Religión, representando tres áreas empíricas del concepto (materiales, prácticas y derechos). Estos luego pasan por un Análisis de Correspondencias Múltiples, lo que nos permite definir y conectar las dimensiones con su valor teórico y la categorización de los países. Los resultados muestran las políticas generales de alojamiento de los países y colocan a Portugal como el país con la política más amigable y a Bulgaria como el país con la más restrictiva.
Palabras clave: Acomodación religiosa, secularismo, Unión Europea, gobernanza religiosa.

Summary: 1. Introduction. 2. Regulation of Religion and Religious Freedom in Europe: Defining the Right to Religious Accommodation. 3. Operationalising Governmental Religious Accommodation. 4. Results. 4.1. Dimensions. 4.2. Country Categorisation. 5. Conclusions. References.

1. Introduction

The so-called "return of religion" on a global scale is evident in its increasing significance in international politics, the rise of "new religious movements", and the strengthening of fundamentalisms across Europe and beyond.[1] Governments consistently encounter demands for recognising religious practices and groups that sometimes clash with their mainstream traditions.[2] Appeals for the inclusion of religious practices in the public sphere continue

---

[1] Roberto Blancarte, 'Religión y Sociología: Cuatro décadas alrededor del concepto de secularizacion.', *Estudios Sociológicos*, Número Extraordinario (2012): 59-81; Alberta Giorgi and Julia Martínez-Ariño, 'The Political Mobilisation of Religion and Gender in Intersectional Perspective', *Religion, State and Society* 52, no. 5 (2024): 442-49, https://doi.org/10.1080/09637494.2024.2444737.

[2] Tariq Modood and Thomas Sealy, 'Freedom of Religion and the Accommodation of Religious Diversity: Multiculturalising Secularism', *Religions* 12, no. 10 (13 October 2021): 868, https://doi.org/10.3390/REL12100868.

Anaquel estud. árabes 36(2), 2025, 185-197

185

to rise, predominantly highlighting Muslims and their challenges in certain countries. Consequently, European academia has primarily focused on the religious governance of Islam,[3] occasionally leaving other minority faiths without representation.[4]

In the governance of religion, there has been considerable discussion from various perspectives on religious accommodation as a tool for managing diversity. Despite this, although multiple fields have explored religious accommodation, there has been little dialogue across disciplines. Generally speaking, religious accommodation has been examined based on the reasoning and justification behind it, with a primary focus on when it should be provided. Most discussions centre on exemptions, waiving specific rules to allow for religious practices to occur.[5] Nevertheless, the justification for such accommodation can vary by discipline; some are centred on personal religious rights, while others focus on anti-discrimination principles. However, most of these discussions do not identify a provider for accommodation.

This article aims to centre the discussion on a society's public sphere, which governments typically regulate through proposed governmental religious accommodation policies. An interdisciplinary dialogue contributes to a definition of religious accommodation that encompasses multiple faiths and can ultimately be measured.

Governmental religious accommodation can be defined as the ability of governments to include, to some extent, religious practices that are not part of the majority's.[6] The concept is straightforward, but several complications arise once the application comes into play. One issue is determining whether this accommodation is reflected in public policy. Furthermore, identifying whether it is prohibitive or permissive helps create policy patterns in various countries. In a world where religion is increasingly playing a significant role in identity politics, it is imperative to diversify and update the tools by considering religious accommodation to address the challenges of identity mobilisation.

This research proposes utilising governmental religious accommodation to examine the strategies employed by the government for incorporating the practices of minority religions into mainstream society, regardless of whether other citizens deem them acceptable. Thus, religious accommodation serves as a legal mechanism that enables religious individuals to practise their faith within an institutional context that often overlooks them.[7] However, it is essential to note that while religious accommodation aims to enhance the lives of religious individuals, it is also intended to shield society as a whole from potential burdens.[8] Moreover, it can be regarded as a crucial instrument as it protects the rights to religious freedom for both religious and non-religious individuals. Furthermore, religious accommodation aligns with a secular policy framework that advocates for no religious interference in the political realm. This alignment allows the political sphere to regulate the presence of religion in the public domain while preserving political autonomy based on neutrality and equality among groups.

Although some previous measurements and indices address the regulation and restrictions on religion, they tend to adopt a general perspective or are designed solely to measure Islam.[9]

Therefore, this article defines, operationalises, and translates *Governmental Religious Accommodation* into an empirical dimension that measures all religious minorities within a country. Consequently, the operationalisation presented here builds upon the earlier work of these indices to emphasise the individual strategies employed by governments. This foundation will facilitate the categorisation and measurement of the extent to which countries practise religious accommodation. It contributes to the potential for following up on requests and demands that are becoming normalised across Europe.

Consequently, this article aims to answer the following research question: How accommodating are EU countries towards religion? To achieve this, the goal outlined in this piece is divided into three parts: first, it aims to provide a multidisciplinary definition of the proposed tool—governmental religious accommodation—by considering the various dimensions and elements found across different disciplines where no united consensus exists; second, it operationalises the concept into proxy variables that enable its quantitative measurement; and finally, it assesses the accommodation of all minority religions within a national context at the level of the European Union. This work aims to contribute to the discussion on religious governance and include other minority religions.

---

[3]   Matthias Koenig, 'Europeanising the Governance of Religious Diversity: An Institutionalist Account of Muslim Struggles for Public Recognition', *Journal of Ethnic and Migration Studies* 33, no. 6 (20 August 2007): 911-32, https://doi.org/10.1080/13691830701432756; Eren Tatari, 'Theories of the State Accommodation of Islamic Religious Practices in Western Europe', *Journal of Ethnic and Migration Studies* 35, no. 2 (2009): 271-88, https://doi.org/10.1080/13691830802586260; Avi Astor, 'Religious Governance and the Accommodation of Islam in Contemporary Spain', *Journal of Ethnic and Migration Studies* 40, no. 11 (2 November 2014): 1716-35, https://doi.org/10.1080/1369183X.2013.871493; Tariq Modood and Riva Kastoryano, 'Secularism and the Accommodation of Muslims in Europe', in *Multiculturalism, Muslims and Citizenship: A European Approach*, ed. Tariq Modood, Anna Triandafyllidou, and Ricard Zapata-Barrero (London: Routledge, 2006), 162-78.

[4]   Eduardo Ruiz Vieytez, 'Religious Diversity, Minorities and Human Rights: Gaps and Overlaps in Legal Protection', *Religions* 15, no. 1 (2024), https://doi.org/10.3390/rel15010087.

[5]   Ruiz Vieytez.

[6]   Gérard Bouchard and Charles Taylor, *Building the Future 'A Time for Reconciliation'*, 2008; Emmanuelle Bribosia, Julie Ringelheim, and Isabelle Rorive, 'Reasonable Accommodation for Religious Minorities: A Promising Concept for European Antidiscrimination Law?', *Maastricht Journal of European and Comparative Law* 17, no. 2 (2010): 137-61.

[7]   Rex Ahdar and Ian Leigh, *Religious Freedom in the Liberal State*, *Religious Freedom in the Liberal State*, 2nd ed. (Oxford: Oxford University Press, 2013); Martha Craven Nussbaum, *Liberty of Conscience: In Defense of America's Tradition of Religious Equality* (New York: BasicBooks, 2008).

[8]   Gérard Bouchard and Charles Taylor, *Building the Future 'A Time for Reconciliation'*, 2008; Emmanuelle Bribosia, Julie Ringelheim, and Isabelle Rorive, 'Reasonable Accommodation for Religious Minorities: A Promising Concept for European Antidiscrimination Law?', *Maastricht Journal of European and Comparative Law* 17, no. 2 (2010): 137-61.

[9]   Angelika Frida Schlanger, 'Religious Accommodation in Western Europe: The Case of Islam' (Ph.D, Yale University, 2014); Serdar Kaya, 'State Policies toward Islam in Twenty Countries in Western Europe: The Accommodation of Islam Index', *Muslim World Journal of Human Rights* 14, no. 1 (2017): 55-81, https://doi.org/10.1515/mwjhr-2016-0003.

2. Regulation of Religion and Religious Freedom in Europe: Defining the Right to Religious Accommodation

As the inflow of immigrants to Europe increased for work reasons, along with the eventual arrival of their families, their concerns shifted from labour and economic issues to cultural and religious needs as they became permanent residents or citizens.[10] Although governments have attempted to address these concerns with traditional strategies, they still fail to comprehensively tackle the challenges posed by the growing pluralisation of Europe. These circumstances have become increasingly familiar over time. As minority groups developed into more active societal participants, the need for diverse tools, such as accommodations, became increasingly apparent, particularly in the legal domain.[11]

Several authors and governments have discussed religious accommodation over the years.[12] A substantial body of literature on the topic, primarily from the legal and social sciences, emerged during the era of multiculturalism.[13] Although there is no official definition, a general consensus exists regarding religious accommodation, as many definitions share similar characteristics. Nonetheless, several types can be identified, and their empirical application and measurement have been less prevalent than their normative counterparts.

Religious accommodation advocates for the inclusion of spiritual practices that were not deemed essential to some individuals' cultural and ethnic identities and were initially excluded from traditional integration strategies.[14] It represents a collective and fundamental right aimed at those with strong convictions who encounter obstacles in practising their moral beliefs due to a conflict with mainstream cultural customs.[15] In other words, it pertains to those whose practices typically do not conform to the norm and require a space to be created for them.[16] There are various forms of religious accommodation based on their justification and providers, and they differ in specific aspects (Table 1).

Table 1. Multidimensionality of Religious Accommodation

Type	Definition	Criteria	Forms	Contexts that influence it	Means to ask for it
Personal Religious Right	It concerns how far one can interpret or enforce the law to consider the right to be free of burdens that impede one's religious conduct.[17]	Respect for the right to religious freedom.[18]	Exemptions and incorporation of religious codes within the dominant legal system.[19]	The history of court decisions, language, and intent of religious clauses.[20] Church-state relations can also significantly impact.[21]	Political mobilisation through human and monetary resources.[22] As well as social media campaigns.[23]

[10] Joel S. Fetzer and Joel Christopher Soper, *Muslims and the State in Britain, France, and Germany* (Cambridge: Cambridge University Press, 2004).

[11] Camil Ungureanu and Lasse Thomassen, 'The Post-Secular Debate: Introductory Remarks', *The European Legacy* 20, no. 2 (2015): 103-8; Veit Bader, Katayoun Alidadi, and Floris Vermeulen, 'Religious Diversity and Reasonable Accommodation in the Workplace in Six European Countries: An Introduction', *International Journal of Discrimination and the Law* 13, no. 2-3 (2013): 54-82, https://doi.org/10.1177/1358229113493691.

[12] Jonathan Fox, 'The Religion and the State Project', 2019; U.S. Department of State, 'International Religious Freedom Reports', 2020; Eduardo Ruiz Vieytez, 'Constitutions, Minorities and Superdiversity', *The Age of Human Rights Journal*, no. 19 (19 December 2022): 187-203, https://doi.org/10.17561/tahrj.v19.6770; Ruiz Vieytez, 'Religious Diversity, Minorities and Human Rights: Gaps and Overlaps in Legal Protection'; Avi Astor, Mar Griera, and Mónica Cornejo, 'Religious Governance in the Spanish City: Hands-on versus Hands-off Approaches to Accommodating Religious Diversity in Barcelona and Madrid', *Religion, State and Society* 47, no. 4-5 (2019): 390-404, https://doi.org/10.1080/09637494.2019.1668213.

[13] Will Kymlicka and Wayne Norman, 'Citizenship in Culturally Diverse Societies: Issues, Contexts, Concepts', in *Citizenship in Diverse Societies*, ed. Will Kymlicka and Wayne Norman (Oxford University Press, 2000), 1-42, https://doi.org/10.1093/019829770X.003.0001.

[14] Paul Bou-Habib, 'A Theory of Religious Accommodation', *Journal of Applied Philosophy* 23, no. 1 (2006): 109-26; Veit Bader, *Secularism or Democracy: Associational Governance of Religious Diversity* (Amsterdam: Amsterdam University Press, 2007).

[15] Bou-Habib, 'A Theory of Religious Accommodation'.

[16] Matteo Bonotti and Jonathan Seglow, 'Introduction: Religion and Public Life', *Ethnicities* 17, no. 2 (2017): 141-53, https://doi.org/10.1177/1468796817692630; Jonathan Seglow, 'Religious Accommodation: Responsibility, Integrity, and Self-Respect', in *Religion In Liberal Political Philosophy*, ed. Cecile Laborde and Aurelia Bardon (New York: Oxford University Press, 2017), 177-90; Michael W. McConnell, 'Accommodation of Religion', *The Supreme Court Review*, 1985, 1-59; Bouchard and Taylor, *Building the Future 'A Time for Reconciliation'*; Schlanger, 'Religious Accommodation in Western Europe: The Case of Islam'; Nussbaum, *Liberty of Conscience: In Defense of America's Tradition of Religious Equality*; Erdem Dikici, 'Governance of Religious Diversity in Western Europe', *Ethnicities*, 2019, 1-12, https://doi.org/10.1177/1468796819832342.

[17] Bou-Habib, 'A Theory of Religious Accommodation'; Bonotti and Seglow, 'Introduction: Religion and Public Life'.

[18] Christopher Eisgruber and Lawrence Sager, *Religious Freedom and the Constitution* (Harvard University Press, 2007); Nussbaum, *Liberty of Conscience: In Defense of America's Tradition of Religious Equality*.

[19] J. B. Walker, 'Guest Editorial: A Primer on Governmental Accommodation of Religion', *Journal of Church and State* 49, no. 3 (2007): 409-21, https://doi.org/10.1093/jcs/49.3.409; Peter Jones, 'Religious Exemptions and Distributive Justice', in *Religion In Liberal Political Philosophy*, ed. Cecile Laborde and Aurelia Bardon (New York: Oxford University Press, 2017); Jacob T. Levy, 'Classifying Cultural Rights', in *NOMOS XXXIX: Ethnicity and Group Rights*, ed. Will Kymlicka and Ian Shapiro (New York: New York University Press, 1997).

[20] Maureen O Manion, 'Churches and States: The Politics of Accommodation', *Journal of Church and State* 44, no. 2 (2002): 317-43, https://doi.org/10.1093/jcs/44.2.317.

[21] Stephen V. Monsma and J. Christopher Soper, *The Challenge of Pluralism*, 2nd ed. (Lanham: Rowman and Littlefield International, 2009).

[22] Tatari, 'Theories of the State Accommodation of Islamic Religious Practices in Western Europe'; Matthias Koenig, 'Religion Und Recht', *Handbuch Religionssoziologie*, 2018, 741-61, https://doi.org/10.1007/978-3-531-18924-6_30.

[23] Gregor McLennan, 'Postsecularism: A New Global Debate', in *Globalisation and Utopia*, ed. Patrick Hayden and Chamsy El-Ojeili (Palgrave Macmillan, 2009), 82-98.

Type	Definition	Criteria	Forms	Contexts that influence it	Means to ask for it
Integrity Right	It gives people a "break" by giving them options to compel with their beliefs without burden.[24]	A person's integrity is attacked.[25] Conditionally, others' well-being must not be compromised, and the practice is a duty.[26]	Exemptions and incorporation of religious codes within the dominant legal system.[27]	The history of court decisions, language, and intent of religious clauses.[28] Church-state relations can also significantly impact.[29]	Political mobilisation through human and monetary resources.[30] As well as social media campaigns.[31]
Anti-discrimination	The right of non-discrimination groups to enjoy similar opportunities to practice religion as a majority member.[32]	It is situational, with two everyday contexts: the wish to wear religious indumenta but forbidden, the refusal to serve or interact with employers' customers based on religious beliefs and facing punishment.[33]	Exemptions (Mandatory and Permissible).[34]	Societal attitudes towards migrants and new religious groups.[35] Church-state relations also play an essential role.[36]	Political mobilisation through human and monetary resources.[37] As well as social media campaigns.[38]
Institutional	The extent to which countries have adapted their religious governance regimes to incorporate the needs of newly arrived minorities.[39]	It depends on how much it will cost to provide the required accommodation, and it will not be provided if it is unreasonable or harmful to providers.[40]	Changing existing policies, practices, and government institutions.[41]	Shaped by schemas, pressures, and priorities specific to the institutional spheres' historical development and practical functioning.[42] Church-state relations also play an essential role.[43]	Political mobilisation through human and monetary resources.[44] As well as social media campaigns.[45]

It is essential to distinguish between them, as a different combination could lead to varied outcomes in each respective context. Therefore, the next step is to concentrate on one combination that facilitates the operationalisation of this multidimensional concept. In this instance, the emphasis is on institutional-based religious accommodation as the primary unit for this study. This approach is grounded in the right to freedom of faith and the principle of anti-discrimination. Although both categories are identified within the matrix (Table 1), they concentrate on the

---

[24]   Nussbaum, *Liberty of Conscience: In Defense of America's Tradition of Religious Equality*.

[25]   Jocelyn Maclure and Charles Taylor, 'Secularism and Freedom of Conscience', 2011, 142; Cecile Laborde, *Liberalism's Religion* (Cambridge MA: Harvard University Press, 2017); Seglow, 'Religious Accommodation: Responsibility, Integrity, and Self-Respect'; Bou-Habib, 'A Theory of Religious Accommodation'.

[26]   Bou-Habib, 'A Theory of Religious Accommodation'.

[27]   Walker, 'Guest Editorial: A Primer on Governmental Accommodation of Religion'; Jones, 'Religious Exemptions and Distributive Justice'; Levy, 'Classifying Cultural Rights'.

[28]   Manion, 'Churches and States: The Politics of Accommodation'.

[29]   Monsma and Soper, *The Challenge of Pluralism*.

[30]   Tatari, 'Theories of the State Accommodation of Islamic Religious Practices in Western Europe'; Koenig, 'Religion Und Recht'.

[31]   McLennan, 'Postsecularism: A New Global Debate'.

[32]   Cécile Laborde, 'Chapter Twenty-Two. Protecting Freedom of Religion in the Secular Age', in *Politics of Religious Freedom*, ed. Winnifred Fallers Sullivan et al. (University of Chicago Press, 2015), 269-79, https://doi.org/doi:10.7208/9780226248646-028.

[33]   Robert Wintemute, 'Accommodating Religious Beliefs: Harm, Clothing or Symbols, and Refusals to Serve Others', *Modern Law Review* 77, no. 2 (2014): 223-53, https://doi.org/10.1111/1468-2230.12064.

[34]   Walker, 'Guest Editorial: A Primer on Governmental Accommodation of Religion'; Jones, 'Religious Exemptions and Distributive Justice'.

[35]   Matthias Koenig, 'How Nations-States Respond to Religious Diversity', in *International Migration and The Governance of Religious Diversity*, ed. Paul Bramadat and Matthias Koenig (Montreal: McGill University Press, 2009), 293-322.

[36]   Monsma and Soper, *The Challenge of Pluralism*.

[37]   Tatari, 'Theories of the State Accommodation of Islamic Religious Practices in Western Europe'; Koenig, 'Religion Und Recht'.

[38]   McLennan, 'Postsecularism: A New Global Debate'.

[39]   Schlanger, 'Religious Accommodation in Western Europe: The Case of Islam'.

[40]   Bader, Alidadi, and Vermeulen, 'Religious Diversity and Reasonable Accommodation in the Workplace in Six European Countries: An Introduction'.
       Schlanger, 'Religious Accommodation in Western Europe: The Case of Islam'.

[41]   Schlanger, 'Religious Accommodation in Western Europe: The Case of Islam'.

[42]   Avi Astor and Mar Griera, 'Engaging with the Other: Religion, Identity, and Politics in the Mediterranean.', *New Diversities* 17, no. 1 (2015): 1-7; Astor, Griera, and Cornejo, 'Religious Governance in the Spanish City: Hands-on versus Hands-off Approaches to Accommodating Religious Diversity in Barcelona and Madrid'.

[43]   Monsma and Soper, *The Challenge of Pluralism*.

[44]   Tatari, 'Theories of the State Accommodation of Islamic Religious Practices in Western Europe'; Koenig, 'Religion Und Recht'.

[45]   McLennan, 'Postsecularism: A New Global Debate'.

justification. Meanwhile, the institutional category goes further by relating it to the governance of congregations by the state.

Therefore, as states provide and regulate institution-based accommodation,[46] it can be viewed as a political right that falls under the overarching framework of religious governance. One's freedom of belief justifies this right, as it is rooted in the liberty of creed, which allows for freedom of worship, provided it does not jeopardise society. Additionally, it is founded on anti-discriminatory principles, aiming to level the playing field between believers and non-believers by removing burdens or ensuring equal treatment and redistribution of regulations. This article proposes a concept termed *Governmental Religious Accommodation*, categorising it as a political right.

As a political right, it can be manifested through changes in existing legislation, the regulation of new practices, and the most common exemptions.[47] It is justified when there is a conflict between fundamental rights, freedoms, rules, regulations, or institutions.[48] Once legitimised, the next step is to alleviate the burden on dedicated individuals to conduct their religious practices.[49]

Given that it is a right conferred by the state and requested by individuals, it has limits, which generally depend on the inability to impose hardship on the party required to provide it or the incompatibility with an existing jurisdiction.[50] In short, the granted benefit should not impose any difficulties or additional costs on the institution. Furthermore, its practice must not infringe upon the fundamental rights of others.

Due to these limitations, accommodations can be provided in various ways, including changes to existing legislation, regulation of new practices, and the most commonly used method, exonerations.[51] Exemptions are the typical means by which governments allow certain groups to be exempt from adhering to specific rules that burden their cultural practices. In essence, they are viewed as tools the judicial system employs to address the existing disadvantages faced by one or more groups compared to the majority.[52] However, due to the increasing number of congregations in Europe, some governments regulate observances such as burial, slaughter laws, and the import of religious articles to minimise the continual use of exemptions.[53] This regulation has two primary aims: reducing exoneration cases and promoting equal treatment for all congregations. Based on these mechanisms, accommodation would translate into three empirical areas: materials, practices, and rights. Together, they address the various needs that religious people have to conduct their practices.[54]

One of the most fundamental requirements for the private and public observance of religion is accessibility to the materials used for rites, ceremonies, and personal expression. Any restrictions in this area would imply that religious individuals would have difficulties practising the core mandates of their faith in any sphere, whether private or public. The second area pertains to the ability to follow religious commands, whether expressed publicly or privately. Practices encompass a range of activities, including rites of passage, burials, clothing, religious symbols, and dietary laws. The ideal scenario is to properly regulate these practices without hindering them; instead, they should seamlessly integrate them into the social sphere.[55] The third area encompasses a legal perspective, as it includes a series of rights that the state must provide, which fall under the protection of the Religious Freedom Act, to which most countries adhere. Some of these rights include permissions for clergy to access jails, military bases, hospitals, and other public entities to visit members of their congregations.[56] Any restrictions or prohibitions in this area are considered a violation of the right to freedom of religion.

Together, these three areas offer a multidimensional approach to empirically identify *Governmental Religious Accommodation* within the public and private spheres of society. The significance of these areas lies in the ability to operationalise the concepts, measure them, and apply them to specific cases in Europe over the years.

---

[46] Ragna Lillevik, 'The Political Accommodation of Military Turbans and the Police Hijab in Norway: Windows of Opportunity', *Journal of Ethnic and Migration Studies* 46, no. 11 (2020): 2426-42, https://doi.org/10.1080/1369183X.2019.1675501.

[47] Jonathan Seglow and Andrew Shorten, 'Introduction', in *Religion and Political Theory: Secularism, Accommodation and the New Challenges of Religious Diversity*, ed. Jonathan Seglow and Andrew Shorten, 1st ed. (Rowman and Littlefield International, 2019), 1-16; Jones, 'Religious Exemptions and Distributive Justice'; Levy, 'Classifying Cultural Rights'.

[48] Bader, Alidadi, and Vermeulen, 'Religious Diversity and Reasonable Accommodation in the Workplace in Six European Countries: An Introduction'; Nussbaum, *Liberty of Conscience: In Defense of America's Tradition of Religious Equality*; Eisgruber and Sager, *Religious Freedom and the Constitution*; Wintemute, 'Accommodating Religious Beliefs: Harm, Clothing or Symbols, and Refusals to Serve Others'.

[49] Schlanger, 'Religious Accommodation in Western Europe: The Case of Islam'; Nussbaum, *Liberty of Conscience: In Defense of America's Tradition of Religious Equality*.

[50] Bribosia, Ringelheim, and Rorive, 'Reasonable Accommodation for Religious Minorities: A Promising Concept for European Antidiscrimination Law?'; Bouchard and Taylor, *Building the Future 'A Time for Reconciliation'*.

[51] Seglow and Shorten, 'Introduction'; Jones, 'Religious Exemptions and Distributive Justice'; Levy, 'Classifying Cultural Rights'.

[52] Jones, 'Religious Exemptions and Distributive Justice'.

[53] Schlanger, 'Religious Accommodation in Western Europe: The Case of Islam'.

[54] Kim Knott, 'Living Religious Practices', in *Intersections of Religion and Migration: Issues at the Global Crossroads*, ed. Jennifer B Saunders, Elena Fiddian-Qasmiyeh, and Susanna Snyder (New York: Palgrave Macmillan, 2016), 71-90, https://doi.org/10.1057/978-1-137-58629-2.

[55] Serdar Kaya, 'Institutionalization of Islam in Secular Europe: The Influence of State-Religion Relations on Anti-Muslim Attitudes', *Policy Studies Journal*, 2019, 1-26, https://doi.org/10.1111/psj.12332.

[56] Jonathan Fox, 'How Secular Are Western Governments' Religion Policies?', *Secular Studies* 1, no. 1 (2019): 3-33; Wendy Cadge et al., 'Religion in Public Institutions: Comparative Perspectives from the United States, the United Kingdom, and Europe', *Journal for the Scientific Study of Religion* 56, no. 2 (1 June 2017): 226-33, https://doi.org/10.1111/JSSR.12350; Mar Griera et al., 'Religión e Instituciones Públicas en España. Hospitales y Prisiones en Perspectiva Comparada', *Revista Internacional de Sociología* 73, no. 3 (30 December 2015): e020-e020, https://doi.org/10.3989/RIS.2015.73.3.E020; Julia Martínez-Ariño et al., 'Demonopolisation and Dislocation: (Re-)Negotiating the Place and Role of Religion in Spanish Prisons', *Social Compass* 62, no. 1 (2 March 2015): 3-21 https://doi.org/10.1177/0037768614560875.

3. Operationalising Governmental Religious Accommodation

The first part of this section will focus on explaining the methodological process to translate the concept of Governmental Religious Accommodation into an empirical measure. This research utilises the measurements from the *Religion and the State*[57] Project and the *Global Restrictions on Religion*.[58] The first dataset comprises several variables related to prejudice against minorities, providing information on governmental discrimination, the number of laws regarding religion, and the level of regulation of religion from 1990 to 2014.[59] The second dataset includes numerous variables regarding impediments to religion imposed by governments and societies from 2007 to 2016.[60] Both datasets provide measurements for global cases, encompassing nearly all countries and territories existing at the time of compilation.

The countries selected are those that were members of the European Union from 2007 to 2014. Although there were a total of twenty-eight, Cyprus was excluded from this study. This decision was made because the data available from a single database is divided into Northern and Southern Cyprus, treating them as independent entities.[61] Nevertheless, the EU recognises Cyprus as a single territory,[62] and combining both scores is problematic due to the significant difference. The selection of variables was based on the three pillars for measuring accommodation: access to materials, restrictions on public religious practices, and constraints on rights. Since the variables consider limitations, restrictions must be at their lowest values to determine the level of accommodation.

The first pillar, access to instruments, stems from the fact that some of the most common religious practices require publications or materials for rituals that must sometimes be imported. There are three variables within this pillar, all drawn from the *Religion and the State Round 3*[63] database. These variables measure restrictions on producing or obtaining materials for rites and ceremonies (M04X), restrictions on importing publications (M08X), and access to writings for personal use (M09X).

The second pillar, practices, is based on adhering to or expressing religious commands, a matter of utmost importance to believers. A combination of private and public rituals may vary from country to country. This section includes four variables from the *Religion and the State Round 3*[64] dataset and two from the *Global Restrictions on Religion.*[65] These variables measure restrictions on rites of passage ceremonies (M05X), limitations on dietary laws and access to necessary food (M06X), restrictions on the observance of burial laws (M11X), limitations on wearing religious clothing or symbols (M12X), regulation of religious symbols (Q10), and governmental interference in religious practices (Q4).

The third pillar, rights, stems from the capacity to practise religion both publicly and privately, by the religious freedom right upheld by most countries around the globe. This section comprises seven variables from the *Religion and the State Round 3*[66] dataset, along with two variables from the *Global Restrictions on Religion*[67]. These variables assess restrictions on the private observance of religious services or holidays (M02X), limitations on the access of clergy to prisons, military bases, hospitals, and other public facilities (M18X, M19X, M20X), as well as restrictions on public preaching or proselytising (Q5, Q6), and the extent of religious education in public schools (VED1).

The selected variables[68] were subsequently analysed using a Multiple Correspondence Analysis (MCA) process to determine their positions within a multidimensional space, which would facilitate the categorisation of cases. This method was chosen for several reasons. Firstly, it shares the same objective as Principal Component Analysis (PCA), which aims to identify the dimensions that most effectively explain the chosen phenomenon.[69] It achieves this by initially depicting the data's underlying structure and determining the distances between categories and observations through a matrix that comprises the variables and the respective observations of individuals, where those present are marked as one and those absent are marked as zero. With such a grid, the MCA allows for the revelation of the underlying dimensions within the data structure.

This technique enables the selection of dimensions based on their explanatory power over the phenomenon. The MCA's list of dimensions is ordered based on their importance and explanatory power; therefore, the first dimension is the most important. In this case, the overall explanation relies on the first two dimensions, while in other cases, the

---

[57]   Fox, 'The Religion and the State Project'.

[58]   Brian J. Grim and Roger Finke, 'International Religion Indexes: Government Regulation, Government Favoritism, and Social Regulation of Religion', *Interdisciplinary Journal of Religion* 23, no. 1 (2008): 1-7, https://doi.org/10.1038/jid.2014.371; Pew Research Centre, 'Global Restrictions on Religion', 2019.

[59]   Fox, 'The Religion and the State Project'.

[60]   Grim and Finke, 'International Religion Indexes: Government Regulation, Government Favoritism, and Social Regulation of Religion'; Pew Research Centre, 'Global Restrictions on Religion'.

[61]   Fox, 'The Religion and the State Project'.

[62]   "Cyprus":https://european-union.europa.eu/principles-countries-history/country-profiles/cyprus_en

[63]   Fox.

[64]   Fox.

[65]   Grim and Finke, 'International Religion Indexes: Government Regulation, Government Favoritism, and Social Regulation of Religion'; Pew Research Centre, 'Global Restrictions on Religion'.

[66]   Fox, 'The Religion and the State Project'.

[67]   Grim and Finke, 'International Religion Indexes: Government Regulation, Government Favoritism, and Social Regulation of Religion'; Pew Research Centre, 'Global Restrictions on Religion'.

[68]   Out of all the mentioned variables, M04X, M08X, and M09X were taken out due to the lack of variability. Such lack of variability is explained because the chosen cases are liberal democracies. However, there is theoretical relevance, and those measurements would present variability in other areas of the world.

[69]   Alboukadel Kassambara, *Practical Guide to Principal Component Methods in R* (STHDA, 2017).

selection must be based on a calculation of the eigenvalues. The PCA technique was not used on this set of variables because it is built for quantitative ones.

Secondly, like Correspondence Analysis (CA) and PCA for categorical variables, MCA provides an excellent method to summarise and visualise data in two-dimensional plots.[70] It identifies the associations between variables and their respective relational patterns. It facilitates visualisation of the selected variables to determine which ones exhibit the most variability and which do not. It emphasises the proximity of the variable points to the barycentre of their respective dimensions; the closer a point is, the less critical the category, while the further away from the centre, the greater its relevance and weight. Consequently, variables that hold no significance are discarded.

Therefore, this technique also serves as a statistical method to avoid the redundancy of the chosen variables. However, the main reason the MCA was considered the most suitable method is that it is mainly made to analyse several categorical variables simultaneously. It is the best one to examine the association between variable categories for categorical variables to eventually categorise countries and reduce dimensions.[71]

The MCA provides coordinates for the variables and cases according to their position within the selected dimensions. Those scores are visualised with a biplot, which is a two-dimensional graph. A biplot allows simultaneous visualisation of information on the dimensions, variables, or cases. It is instrumental in determining the distance between variables and forming categories based on the spaces created by the dimensions.

While aware that MCA can seem to oversimplify complex social realities by reducing multidimensional data to a limited number of axes, it remains a valuable tool for identifying the underlying patterns and relationships among categorical variables. In this study, MCA was chosen for its capacity to visualise country groupings and highlight structural similarities and contrasts in governance approaches to religious diversity, which would be less perceptible through purely descriptive methods.

4. Results

The following section is divided into two parts. The first explains the MCA's preliminary results, focusing on the dimensions the method identifies, their components, and the subsequent categories they can form. The second, country categorisation, concentrates on the areas where EU countries are placed within those dimensions and the type of religious accommodation they practice.

4.1. Dimensions

The MCA identified 26 dimensions, of which the first ten had the most variability. This variability is represented as percentages, with a total sum of 100. Therefore, each dimension contributes a percentage to the whole explanation. Out of those ten, the first two have the most explanatory weight for the categorisation.

The two dimensions primarily represent variability across two areas: the *Privatisation of Religion*, which refers to the movement of religious practices into the private sphere, and the *Regulation of Religion*, which indicates that the state permits a particular faith's rituals to be performed either publicly or privately through various permissions and restrictions. The terminology of these dimensions is significantly influenced by the combination of variables with the most significant weight, regardless of whether they signify freedom or restrictions.

When represented in a two-dimensional plot, the interplay of both dimensions creates four categories that identify the two principal factors for measuring religious accommodation: private/public religious observance and the number of restrictions placed on religious practices (Figure 1).

Such representation aids in identifying the categories and their eventual conceptualisation. Each dimension has a central point, with variables closer to it having minor relevance, while those further away hold greater explanatory weight. Variables exerting a more substantial influence on each dimension are depicted as more prominent than those with a lesser effect. Although they are vital in measuring religious accommodation, they will vary depending on the selection of cases. Each point in Figure 1 also denotes the level of regulation for each variable, illustrated by distinct colours.

---

[70] Fionn Murtagh, *Correspondence Analysis and Data Coding with Java and R* (Boca Ratón: Chapman & Hall, 2005).

[71] Hervé Abdi and Dominique Valentin, 'Multiple Correspondence Analysis', in *Encyclopaedia of Measurement and Statistics*, ed. Neil J. Salkind and Kristin Rasmussen, vol. II (Thousand Oaks: Sage Publications, 2007), 651-57; Kassambara, *Practical Guide to Principal Component Methods in R.*
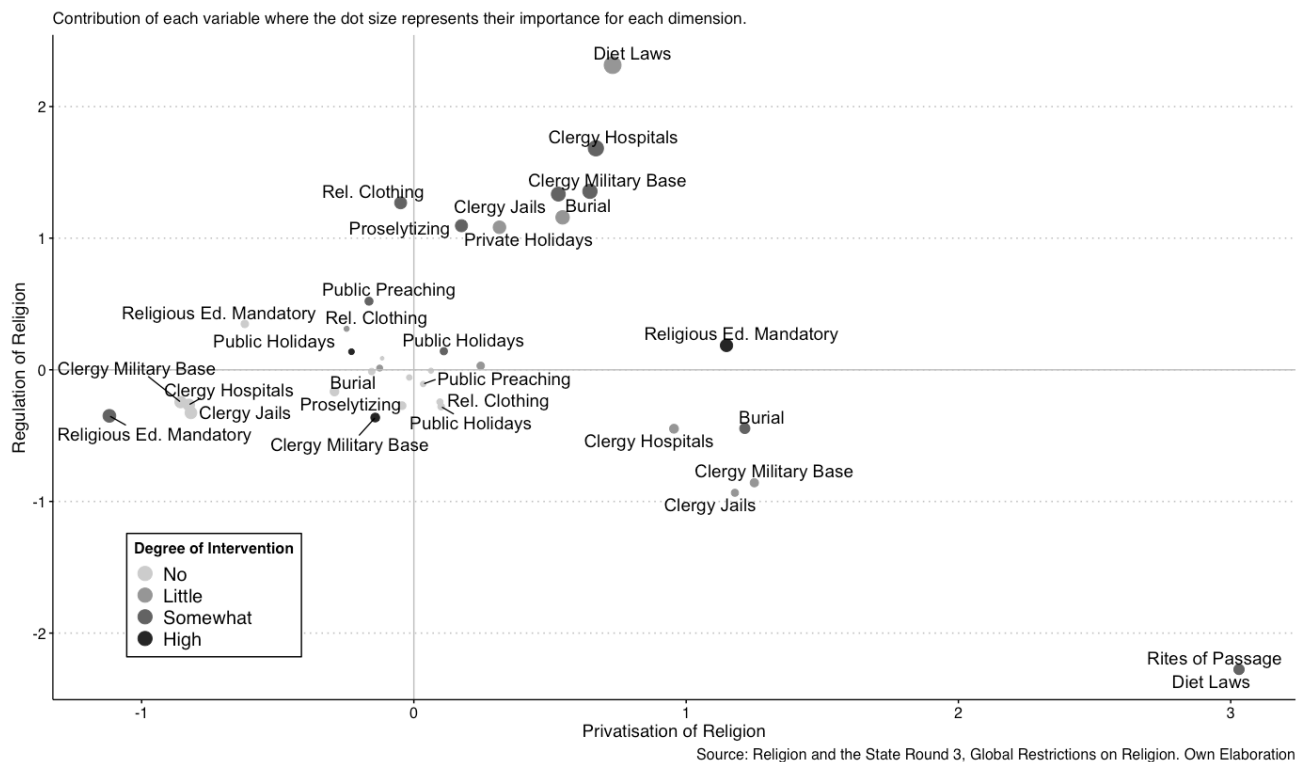
Figure 1. Religious Accommodation Variable Categories: Dimensions and Variable Contribution

The combination in the upper left quadrant represents public observance with several restrictions, referred to as *Public Secularism* (Figure 2). Countries in this category permit religious individuals to practice their faith both publicly and privately, but they impose stringent regulations on such activities in the public sphere. A key variable in this context is the regulation of religious dress, which indicates a slight restriction. For instance, while there may be allowances for certain religious garments, specific items, such as the niqab, are prohibited.
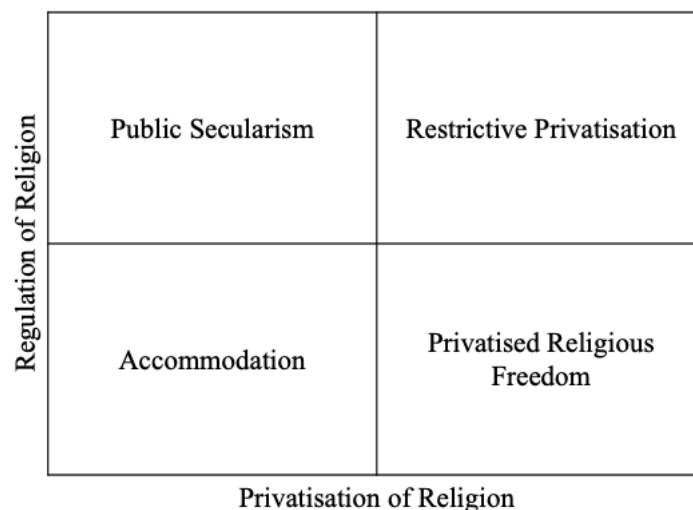

Figure 2. Category items. Own elaboration

In the lower-left quadrant, one finds the allowance for public observance of religion with less prohibitive regulation. This area has been named *Accommodation* because cases that fall into this quadrant tend to regulate religion less restrictively or do not control it at all; most of the variables in this area present little to no regulation. However, one of the most significant ones, mandatory religious education, presents a slight prohibition. This refers to the obligation to follow religious education based on the country's predominant faith, with minimal to no option to opt out.

In the upper right quadrant, the practice of religion is permitted only in a private setting, yet it remains subject to stringent prohibitive regulations. This area is termed *Restrictive Privatisation* because cases within it allow for the free association of religion in the private sphere while imposing restrictions or burdens on the practice of religious rituals and traditions. The most prominent variable in this realm is dietary laws, which have few restrictions, followed by limitations on the clergy's access to hospitals. An example of this would be the prohibition of clergy entering hospitals to administer sacraments or the availability of halal or kosher food.

The lower-right quadrant represents the combination of allowing private observance of religion with minor prohibitions or no regulation on those practices. This part is referred to as *Privatised Religious Freedom* because cases that fall into this category permit individuals to practise their faith privately and do not impose difficulties as long as these practices occur in the private sphere. The most significant variable pertains to rites of passage with certain restrictions, which translates into strict privatisation of those ceremonies under regulation.

The use of religious accommodation and governance of religion aims to keep the regulation as neutral as possible. This neutrality means publicly providing religion with a space in society, ideally while maintaining an attitude of coexistence with the state. Despite factors such as an official state religion favouring a specific one, the practice of state secularity can lead a government to interfere in the traditions of minority faiths. Such motivations do not necessarily directly lead to the various restrictions or regulations on religion within a country.

4.2. Country Categorisation

Countries must first be grouped by average coordinates to be categorised into the presented quadrants. Each country had eight observations and minimal variance throughout the years. This slight variance hindered the visualisation of the data, justifying the need for clustering by average. Once countries were clustered, the country's average was graphed in two dimensions (Figure 3).

There are ten countries in the *Accommodation* category; however, it is essential to note that they are very close to the dividing line between restrictive and non-restrictive. This indicates that countries placed in this quadrant, while less stringent, are not as permissive or accommodating as they could be. This positioning suggests that no European country is entirely relying on religious accommodation as a tool. It is also interesting to observe France in this quadrant, closer to the more restrictive quadrant, yet within the public religion area, primarily because the country is known for its stricter *secularism* strategy.[72]

Average country placement according to Privatisation of Religion and Regulation of Religion.

Source: Religion and the State Round 3, Global Restrictions on Religion. Own Elaboration
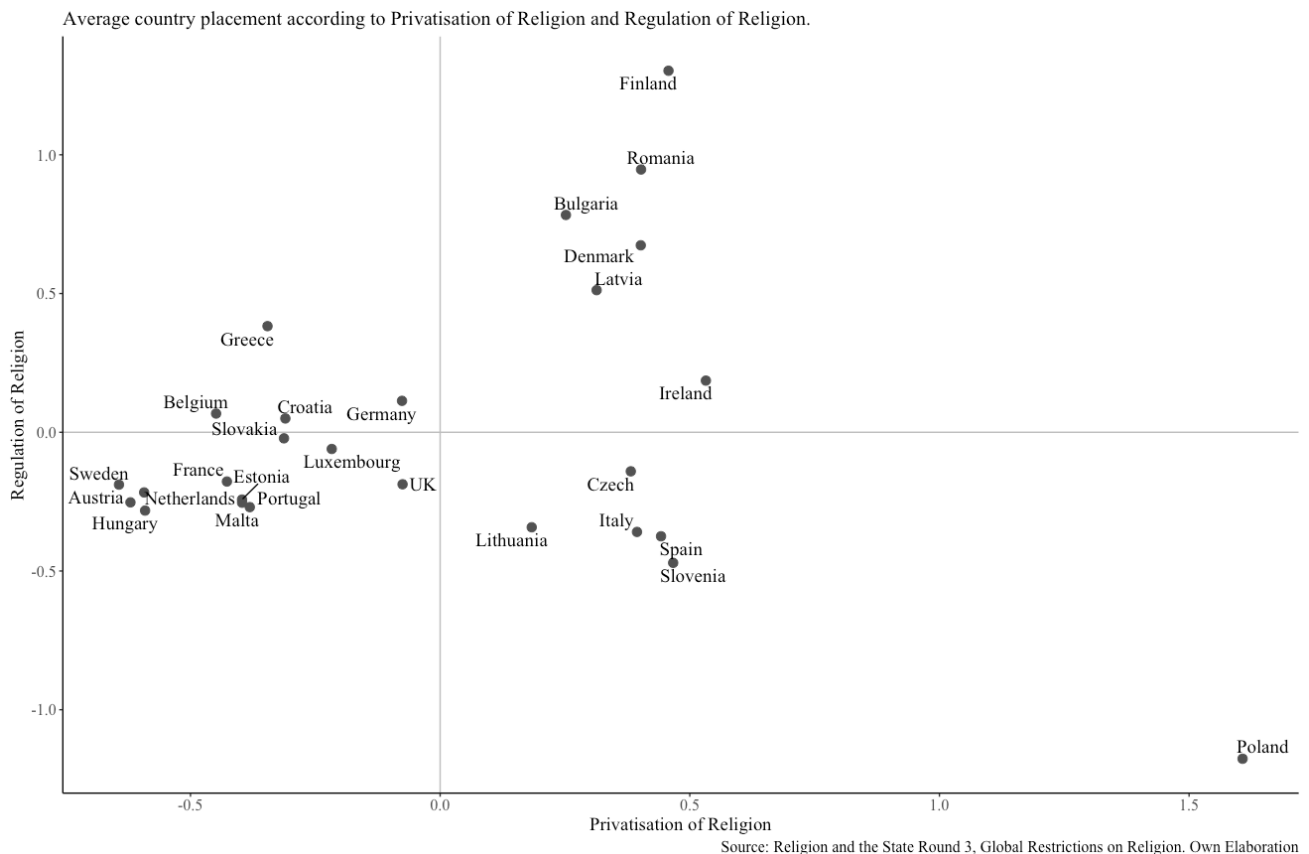
Figure 3. Religious Accommodation in the European Union

Six countries are on the opposite end of the spectrum in the *Privatised Religious Freedom* category. Based on their scores, these countries permit a private allowance of religious practices by not restricting individuals' faith choices, provided they remain private and do not infringe on the rights of others. The most notable example is Poland, where there is a clear trend towards privatising religion, meaning people can practise their faith indoors without restrictions as long as it does not enter the public sphere. The other countries occupy a grey area, being neither as permissive as they could be regarding this privatisation nor entirely restrictive.

---

[72] Michael W. McConnell, 'Believers as Equal Citizens', in *Obligations of Citizenship and Demands of Faith*, ed. Nancy L. Rosenblum (New Jersey: Princeton University Press, 2000), 90-110; Mohammad Mazher Idriss, 'Laïcité and the Banning of the "Hijab" in France', *Legal Studies* 25, no. 2 (2005): 260-95, https://doi.org/10.1111/J.1748-121X.2005.TB00615.X.

Five countries exist within the *Public Secularism* quadrant, with Greece being the most prominent. The cases in this quadrant permit religious practices in the public sphere yet impose several restrictions that burden religious individuals. The others are nearer to the separation line with accommodation, indicating that, despite the limitations, they are relatively low. Furthermore, the German case is particularly close to the privatisation of religion, featuring a minimal number of restrictions.
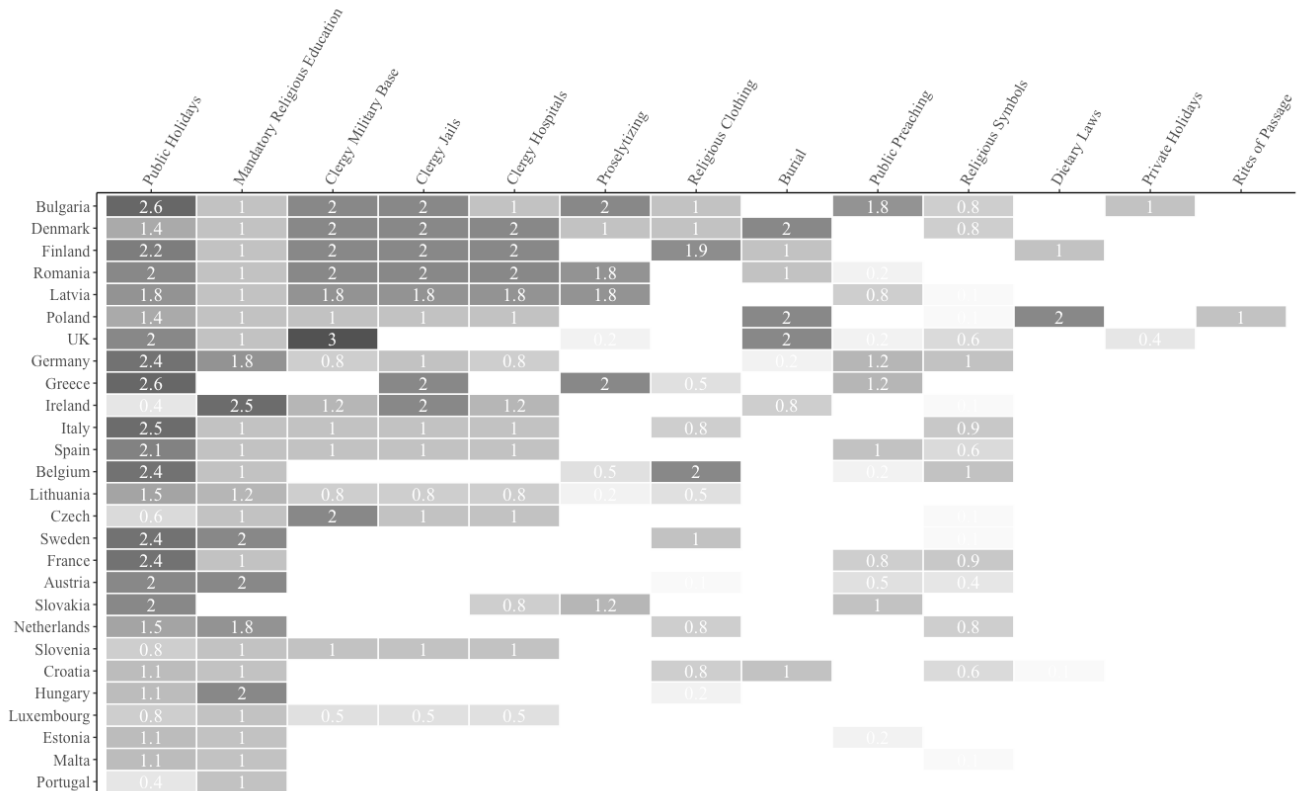
Finally, six countries exist in the *Restrictive Privatisation* quadrant, with four of them imposing significantly more restrictions than the others. Among all quadrants, this one is particularly limiting regarding religious freedom. The threats to religious liberty arise from privatisation and stringent restrictions. In this quadrant, countries effectively push religious activities out of the public sphere and burden those who wish to practise their faith, despite the limitations imposed upon them. The Irish case is noteworthy due to its proximity to the less restrictive area, which correlates with a minimal number of prohibitions in the private sphere.

However, it cannot be regarded as entirely free. While it permits religion in the private sphere, it imposes significant restrictions on specific practices, placing additional burdens on those who wish to live out their faith at home. A prominent example is Finland, which has a strong strategy for privatising religious practices and a considerable number of restrictions.

Most countries are in the centre of the dimensions, with only five cases having significant restrictions or permissions. This positioning translates into reasonable restrictions and regulations on religion from the member states. The results also show more salient countries in the restrictive quadrants than those with significant permission for the private practice of religion. However, many countries are within the *Accommodation* quadrant, which means states attempt to take a coexistence approach.

The context behind the MCA result can be discerned within the databases and average outcomes per variable. The minimum value is zero, indicating no restrictions, while the maximum is three, signifying high restrictions. As illustrated in Figure 4, most countries in the *Restrictive Privatisation* category exhibit the most significant restrictions across nearly all variables. It is crucial to emphasise the considerable number of restrictions on public holidays. The most prominent country in this category is Finland, noted for its highly restricted public holidays for religious minorities, thereby relegating religious celebrations to the private sphere, where the general variable faces no prohibition. However, this context is accompanied by limited access for clergy to public institutions, such as hospitals, military bases, and jails, to engage with their congregations. Furthermore, religious individuals encounter restrictions concerning religious clothing, dietary laws, and burial practices despite strict privatisation. These factors thus elucidate why Finland falls within the *Restrictive Privatisation* category of the MCA.

Darker shades represent high levels of restrictions, while lighter shades represent little to no restrictions

	Public Holidays	Mandatory Religious Education	Clergy Military Base	Clergy Jails	Clergy Hospitals	Proselytizing	Religious Clothing	Burial	Public Preaching	Religious Symbols	Dietary Laws	Private Holidays	Rites of Passage
Bulgaria	2.6	1	2	2	1	2	1		1.8	0.8		1	
Denmark	1.4	1	2	2	2	1	1	2		0.8			
Finland	2.2	1	2	2	2		1.9	1			1		
Romania	2	1	2	2	2	1.8	1	0.2					
Latvia	1.8	1	1.8	1.8	1.8	1.8			0.8	0.1			
Poland	1.4	1	1	1	1			0.2	2	0.6	2		1
UK	2	1	3			0.2		0.2	2	0.6		0.4	
Germany	2.4	1.8	0.8	1	0.8			0.2	1.2	1			
Greece	2.6			2		2	0.5		1.2				
Ireland	0.4	2.5	1.2	2	1.2			0.8					
Italy	2.5	1	1	1	1		0.8			0.9			
Spain	2.1	1	1	1	1				1	0.6			
Belgium	2.4	1				0.5	2		0.2	1			
Lithuania	1.5	1.2	0.8	0.8	0.8	0.2	0.5						
Czech	0.6	1	2	1	1								
Sweden	2.4	2					1						
France	2.4	1							0.8	0.9			
Austria	2	2							0.5	0.4			
Slovakia	2				0.8	1.2			1				
Netherlands	1.5	1.8					0.8			0.8			
Slovenia	0.8	1	1	1	1								
Croatia	1.1	1					0.8	1		0.6			
Hungary	1.1	2					0.2						
Luxembourg	0.8	1	0.5	0.5	0.5								
Estonia	1.1	1							0.2				
Malta	1.1	1											
Portugal	0.4	1											

Source: Religion and the State Round 3, Global Restrictions on Religion. Own Elaboration

Figure 4. Average Country Scores in Original Data Sets

Within the area of *Privatised Religious Freedom*, countries generally impose few to no restrictions on private religious practices. Poland stands out in the MCA due to its relatively less restrictive system for privatised religion. However, it is not devoid of limitations, as Figure 4 illustrates. Nevertheless, its highest figures indicate moderate

regulation concerning burial conditions, dietary laws, and public holidays. Poland receives a slightly non-restrictive score in other areas, even permitting minority clergy to access public institutions such as prisons, hospitals, and military bases. Moreover, religious education is optional, and a substitute class is available for those who choose not to participate.

In the realm of *Public Secularism*, countries typically impose significant restrictions on public holidays while applying more lenient regulations in other areas. This outcome can be attributed to the understanding that public holidays may interfere with other segments of the public sphere, as they require government recognition, which ought to be secular. Consequently, restrictions are implemented to prevent conflicts between minority religious groups. Greece stands out prominently in this regard, as anticipated, with its highly restrictive policies concerning public holidays. These policies also encompass restrictions on proselytising and public preaching, which involve religious groups urging individuals to join their congregations. Such practices are commonplace within secular public spheres, as they need to respect other religions and those who voluntarily choose not to engage in any religious practice.

It is interesting to note that jails are the only institutions where clergy are restricted in accessing and interacting with their congregants. In the rest of the country, Greece has no restrictions, allowing people to practice their religion freely in both the private and some public spheres.

Finally, the *Accommodation* category, which encompasses the most significant number of countries, generally displays low to no restrictions, with some notable exceptions. Countries' positions within this category are relatively close, showing little difference. However, Portugal has the fewest restrictions. Despite its proximity to other countries in Figure 3, it ranks last in Figure 4, establishing it as the EU's least restrictive country regarding minority religions. It is noteworthy to highlight Slovakia's position in this category, as it is near the threshold of Public Secularism. The country's moderate restrictions concerning public holidays and preaching, areas typically restricted in nations classified under Public Secularism, help explain this placement.

Finally, one case must be noted, as most would expect it to belong to a different category: France. Despite its placement within the Accommodation category, France is aligned with its general policy, which includes restrictions on public holidays, religious symbols, and public preaching. All other areas that tend to be privatised impose no limits during the period considered. This lack of regulations accounts for France's placement within the Accommodation sector while adhering to the general principle of *laïcité.*

5. Conclusions

This article initially inquired how one might measure religious accommodation, subsequently proposing a definition and operationalising it. *Governmental Religious Accommodation* is a political right that governments grant on specific occasions and through various means. Consequently, this right enables us to reconsider secularism and emphasises coexistence rather than strict separation. In the context of religious governance, defining and operationalising religious accommodation in this way paves the path for extending this right to other minority faiths and normalising the presence of spiritual practices in the public sphere.

The measurement of accommodation proved to be as multidimensional as its definition. To be translated into an empirical measure, it needed to be broken down into three pillars: access to religious materials, restrictions over public religious practices, and religious rights. These three allowed the variable selection from the *Religion and the State* Project dataset[73] and the *Global Restrictions on Religion* dataset,[74] focusing on the overlapping period from 2007 until 2014.

These variables were then passed through an MCA, which provided the starting point for categorising and answering the second question proposed: Are European countries accommodating towards religion? In short, some of them are. Eleven of the twenty-seven countries are categorised within the Accommodation category, which indicates that member states are publicly accommodating towards religion. The rest of the countries were primarily placed within highly restrictive areas, while some tended to privatise religion without prohibitions. Therefore, most countries that fall into the other categories are not accommodating.

This method serves as a starting point for measuring accommodation in specific minority cases or non-EU countries. Although different results may emerge under more specific circumstances, the measurement and method remain consistent, even though the datasets span from 2016 to as early as 1990, with an overlapping timeframe of seven years. The pillars outlined in this paper are valuable for consideration in further research. These theoretical foundations would be advantageous whether one aims to gather data from scratch or utilise other indicators; the timeframe can be extended by incorporating the academic and theoretical context behind the selected variables. Moreover, this operationalisation enhances the broader study of religious governance, which can apply to several religious groups simultaneously. Consequently, it decentralises the concept of religious governance and encourages us to regard it as an umbrella encompassing various groups.

This categorisation provides a case-specific view of government strategies regarding religion in EU member states and creates a starting point for more questions and further research. It enables a quantitative measurement of national policies regarding religion, which can later be broken down for a more in-depth study. As the data focuses only on the regulation and restrictions of minority religions in general, it is essential to remember that the results would vary if one focused on only one group rather than taking the general average.

---

[73]   Fox, 'The Religion and the State Project'.

[74]   Grim and Finke, 'International Religion Indexes: Government Regulation, Government Favoritism, and Social Regulation of Religion'; Pew Research Centre, 'Global Restrictions on Religion'.

The concept, its operationalisation, and subsequent categorisation provide a preliminary opening for further studies and a shift in the way we examine the presence of religious practices in the public sphere.

References

Abdi, Hervé, and Dominique Valentin. 'Multiple Correspondence Analysis'. In *Encyclopaedia of Measurement and Statistics*, edited by Neil J. Salkind and Kristin Rasmussen, II:651-57. Thousand Oaks: Sage Publications, 2007.

Ahdar, Rex, and Ian Leigh. *Religious Freedom in the Liberal State. Religious Freedom in the Liberal State.* 2nd ed. Oxford: Oxford University Press, 2013.

Arana Barbier, Paula M., and Ángela Suárez Collado. 'Religious Accommodation in a Post-Secular Europe? Redefining the Secular Context.' In *Contemporary Challenges to the Regulation of Religions in Europe.* University of Porto Press, 2023.

Astor, Avi. 'Religious Governance and the Accommodation of Islam in Contemporary Spain'. *Journal of Ethnic and Migration Studies* 40, no. 11 (2 November 2014): 1716-35. https://doi.org/10.1080/1369183X.2013.871493.

Astor, Avi, and Mar Griera. 'Engaging with the Other: Religion, Identity, and Politics in the Mediterranean.' *New Diversities* 17, no. 1 (2015): 1-7.

Astor, Avi, Mar Griera, and Mónica Cornejo. 'Religious Governance in the Spanish City: Hands-on versus Hands-off Approaches to Accommodating Religious Diversity in Barcelona and Madrid'. *Religion, State and Society* 47, no. 4-5 (2019): 390-404. https://doi.org/10.1080/09637494.2019.1668213.

Bader, Veit. *Secularism or Democracy: Associational Governance of Religious Diversity*. Amsterdam: Amsterdam University Press, 2007.

Bader, Veit, Katayoun Alidadi, and Floris Vermeulen. 'Religious Diversity and Reasonable Accommodation in the Workplace in Six European Countries: An Introduction'. *International Journal of Discrimination and the Law* 13, no. 2-3 (2013): 54-82. https://doi.org/10.1177/1358229113493691.

Blancarte, Roberto. 'Religion y Sociologia: Cuatro Decadas Alrededor Del Concepto de Secularizacion.' *Estudios Sociologicos*, no. Numero Extraordinario (2012): 59-81.

Bonotti, Matteo, and Jonathan Seglow. 'Introduction: Religion and Public Life'. *Ethnicities* 17, no. 2 (2017): 141-53. https://doi.org/10.1177/1468796817692630.

Bouchard, Gérard, and Charles Taylor. *Building the Future 'A Time for Reconciliation'*, 2008.

Bou-Habib, Paul. 'A Theory of Religious Accommodation'. *Journal of Applied Philosophy* 23, no. 1 (2006): 109-26.

Bribosia, Emmanuelle, Julie Ringelheim, and Isabelle Rorive. 'Reasonable Accommodation for Religious Minorities: A Promising Concept for European Antidiscrimination Law?' *Maastricht Journal of European and Comparative Law* 17, no. 2 (2010): 137-61.

Cadge, Wendy, Mar Griera, Kristen Lucken, and Ines Michalowski. 'Religion in Public Institutions: Comparative Perspectives from the United States, the United Kingdom, and Europe'. *Journal for the Scientific Study of Religion* 56, no. 2 (1 June 2017): 226-33. https://doi.org/10.1111/JSSR.12350.

Dikici, Erdem. 'Governance of Religious Diversity in Western Europe'. *Ethnicities*, 2019, 1-12. https://doi.org/10.1177/1468796819832342.

Eisgruber, Christopher, and Lawrence Sager. *Religious Freedom and the Constitution*. Harvard University Press, 2007.

Fetzer, Joel S., and Joel Christopher Soper. *Muslims and the State in Britain, France, and Germany*. Cambridge: Cambridge University Press, 2004.

Fox, Jonathan. 'How Secular Are Western Governments' Religion Policies?' *Secular Studies* 1, no. 1 (2019): 3-33.

——— 'The Religion and the State Project', 2019.

Giorgi, Alberta, and Julia Martínez-Ariño. 'The Political Mobilisation of Religion and Gender in Intersectional Perspective'. *Religion, State and Society* 52, no. 5 (2024): 442-49. https://doi.org/10.1080/09637494.2024.2444737.

Griera, Mar, Julia Martínez-Ariño, Anna Clot-Garrell, and Gloria Garcia-Romeral. 'Religión e Instituciones Públicas En España. Hospitales y Prisiones En Perspectiva Comparada'. *Revista Internacional de Sociología* 73, no. 3 (30 December 2015): e020-e020. https://doi.org/10.3989/RIS.2015.73.3.E020.

Grim, Brian J., and Roger Finke. 'International Religion Indexes: Government Regulation, Government Favoritism, and Social Regulation of Religion'. *Interdisciplinary Journal of Religion* 23, no. 1 (2008): 1-7. https://doi.org/10.1038/jid.2014.371.

Idriss, Mohammad Mazher. 'Laïcité and the Banning of the "Hijab" in France'. *Legal Studies* 25, no. 2 (2005): 260-95. https://doi.org/10.1111/J.1748-121X.2005.TB00615.X.

Jones, Peter. 'Religious Exemptions and Distributive Justice'. In *Religion In Liberal Political Philosophy*, edited by Cecile Laborde and Aurelia Bardon. New York: Oxford University Press, 2017.

Kassambara, Alboukadel. *Practical Guide to Principal Component Methods in R*. STHDA, 2017.

Kaya, Serdar. 'Institutionalization of Islam in Secular Europe: The Influence of State-Religion Relations on Anti-Muslim Attitudes'. *Policy Studies Journal*, 2019, 1-26. https://doi.org/10.1111/psj.12332.

——— 'State Policies toward Islam in Twenty Countries in Western Europe: The Accommodation of Islam Index'. *Muslim World Journal of Human Rights* 14, no. 1 (2017): 55-81. https://doi.org/10.1515/mwjhr-2016-0003.

Knott, Kim. 'Living Religious Practices'. In *Intersections of Religion and Migration: Issues at the Global Crossroads*, edited by Jennifer B Saunders, Elena Fiddian-qasmiyeh, and Susanna Snyder, 71-90. New York: Palgrave Macmillan, 2016. https://doi.org/10.1057/978-1-137-58629-2.

Koenig, Matthias. 'Europeanising the Governance of Religious Diversity: An Institutionalist Account of Muslim Struggles for Public Recognition'. *Journal of Ethnic and Migration Studies* 33, no. 6 (20 August 2007): 911-32. https://doi.org/10.1080/13691830701432756.

Arana Barbier, P. M. y Suárez Collado, Á. *Anaquel estud. árabes 36*(2), 2025, 185-197

197

—— 'How Nations-States Respond to Religious Diversity'. In *International Migration and The Governance of Religious Diversity*, edited by Paul Bramadat and Matthias Koenig, 293-322. Montreal: McGill University Press, 2009.

—— 'Religion Und Recht'. *Handbuch Religionssoziologie*, 2018, 741-61. https://doi.org/10.1007/978-3-531-18924-6_30.

Kymlicka, Will, and Wayne Norman. 'Citizenship in Culturally Diverse Societies: Issues, Contexts, Concepts'. In *Citizenship in Diverse Societies*, edited by Will Kymlicka and Wayne Norman, 1-42. Oxford University Press, 2000. https://doi.org/https://doi.org/10.1093/019829770X.003.0001.

Laborde, Cécile. 'Chapter Twenty-Two. Protecting Freedom of Religion in the Secular Age'. In *Politics of Religious Freedom*, edited by Winnifred Fallers Sullivan, Elizabeth Shakman Hurd, Saba Mahmood, and Peter G Danchin, 269-79. University of Chicago Press, 2015. https://doi.org/doi:10.7208/9780226248646-028.

Laborde, Cecile. *Liberalism's Religion*. Cambridge MA: Harvard University Press, 2017.

Levy, Jacob T. 'Classifying Cultural Rights'. In *NOMOS XXXIX: Ethnicity and Group Rights*, edited by Will Kymlicka and Ian Shapiro. New York: New York University Press, 1997.

Lillevik, Ragna. 'The Political Accommodation of Military Turbans and the Police Hijab in Norway: Windows of Opportunity'. *Journal of Ethnic and Migration Studies* 46, no. 11 (2020): 2426-42. https://doi.org/10.1080/1369183X.2019.1675501.

Maclure, Jocelyn, and Charles Taylor. 'Secularism and Freedom of Conscience', 2011, 142.

Manion, Maureen O. 'Churches and States : The Politics of Accommodation'. *Journal of Church and State* 44, no. 2 (2002): 317-43. https://doi.org/https://doi.org/10.1093/jcs/44.2.317.

Martínez-Ariño, Julia, Gloria García-Romeral, Gemma Ubasart-González, and Mar Griera. 'Demonopolisation and Dislocation: (Re-)Negotiating the Place and Role of Religion in Spanish Prisons': *Http://Dx.Doi.Org/10.1177/0037768614560875* 62, no. 1 (2 March 2015): 3-21. https://doi.org/10.1177/0037768614560875.

McConnell, Michael W. 'Accommodation of Religion'. *The Supreme Court Review*, 1985, 1-59.

—— 'Believers as Equal Citizens'. In *Obligations of Citizenship and Demands of Faith*, edited by Nancy L. Rosenblum, 90-110. New Jersey: Princeton University Press, 2000.

McLennan, Gregor. 'Postsecularism: A New Global Debate'. In *Globalisation and Utopia*, edited by Patrick Hayden and Chamsy El-Ojeili, 82-98. Palgrave Macmillan, 2009.

Modood, Tariq, and Riva Kastoryano. 'Secularism and the Accommodation of Muslims in Europe'. In *Multiculturalism, Muslims and Citizenship: A European Approach*, edited by Tariq Modood, Anna Triandafyllidou, and Ricard Zapata-Barrero, 162-78. London: Routledge, 2006.

Modood, Tariq, and Thomas Sealy. 'Freedom of Religion and the Accommodation of Religious Diversity: Multiculturalising Secularism'. *Religions* 12, no. 10 (13 October 2021): 868. https://doi.org/10.3390/REL12100868.

Monsma, Stephen V., and J. Christopher Soper. *The Challenge of Pluralism*. 2nd ed. Lanham: Rowman and Littlefield International, 2009.

Murtagh, Fionn. *Correspondence Analysis and Data Coding with Java and R*. Boca Ratón: Chapman & Hall, 2005.

Nussbaum, Martha Craven. *Liberty of Conscience: In Defense of America's Tradition of Religious Equality*. New York: BasicBooks, 2008.

Pew Research Centre. 'Global Restrictions on Religion', 2019.

Ruiz Vieytez, Eduardo. 'Constitutions, Minorities and Superdiversity'. *The Age of Human Rights Journal*, no. 19 (19 December 2022): 187-203. https://doi.org/10.17561/tahrj.v19.6770.

—— 'Religious Diversity, Minorities and Human Rights: Gaps and Overlaps in Legal Protection'. *Religions* 15, no. 1 (2024). https://doi.org/10.3390/rel15010087.

Schlanger, Angelika Frida. 'Religious Accommodation in Western Europe: The Case of Islam'. Ph.D, Yale University, 2014.

Seglow, Jonathan. 'Religious Accommodation: Responsibility, Integrity, and Self-Respect'. In *Religion in Liberal Political Philosophy*, edited by Cecile Laborde and Aurelia Bardon, 177-90. New York: Oxford University Press, 2017.

Seglow, Jonathan, and Andrew Shorten. 'Introduction'. In *Religion and Political Theory: Secularism, Accommodation and the New Challenges of Religious Diversity*, edited by Jonathan Seglow and Andrew Shorten, 1st ed., 1-16. Rowman and Littlefield International, 2019.

Tatari, Eren. 'Theories of the State Accommodation of Islamic Religious Practices in Western Europe'. *Journal of Ethnic and Migration Studies* 35, no. 2 (2009): 271-88. https://doi.org/10.1080/13691830802586260.

Ungureanu, Camil, and Lasse Thomassen. 'The Post-Secular Debate : Introductory Remarks'. *The European Legacy* 20, no. 2 (2015): 103-8.

U.S. Department of State. 'International Religious Freedom Reports', 2020.

Walker, J. B. 'Guest Editorial: A Primer on Governmental Accommodation of Religion'. *Journal of Church and State* 49, no. 3 (2007): 409-21. https://doi.org/10.1093/jcs/49.3.409.

Wintemute, Robert. 'Accommodating Religious Beliefs: Harm, Clothing or Symbols, and Refusals to Serve Others'. *Modern Law Review* 77, no. 2 (2014): 223-53. https://doi.org/10.1111/1468-2230.12064.