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Beyond Separation and Establishment: State–Religion Relations and Inclusive Governance in Contemporary Democracies

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Abstract

State–religion relations in contemporary democracies are increasingly shaped by religious diversity, institutional pluralism, and the growing involvement of public authorities in regulating recognition, accommodation, participation, and access to public resources. However, existing studies often examine constitutional arrangements, administrative implementation, and democratic outcomes separately, leaving limited integration across these dimensions. This study examines how institutional arrangements and religious-policy practices shape substantive inclusion, the conditions under which recognition, accommodation, cooperation, and regulation support or constrain inclusive governance, and the role of participation and accountability in representing religious and nonreligious constituencies. Using a qualitative comparative conceptual analysis, the study synthesizes peer-reviewed scholarship and comparative secondary evidence through theory-guided thematic comparison and comparative conceptual synthesis. The analysis focuses on institutional arrangements, governance processes, and democratic outcomes. The findings show that formal guarantees of equality and religious freedom provide an important institutional foundation but do not ensure substantive inclusion. Administrative interpretation, organizational routines, local political conditions, and participatory arrangements influence how formal rules are implemented. Recognition and accommodation may expand institutional access while also raising questions concerning individual autonomy, representation, and equal protection. Democratic outcomes vary across equality, non-discrimination, political voice, access to resources, institutional confidence, and social trust. The study concludes that inclusive state–religion governance depends on the alignment of institutional protection, consistent implementation, representative participation, rights safeguards, and accountable public administration rather than on any single model of state–religion relations.

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INTRODUCTION

Research Background

Religious diversity has become an increasingly important concern for contemporary democratic governance as migration, changing patterns of religious affiliation, and the growing visibility of both religious and nonreligious identities reshape public life. Evidence from Western Europe shows that patterns of religiosity among migrant and native populations remain diverse and cannot be reduced to a simple trajectory of secularization (Güveli & Platt, 2023). Correspondingly, comparative scholarship has moved beyond treating state–religion relations as a binary choice between strict separation and religious establishment, emphasizing instead the variety of legal, political, and institutional arrangements through which states govern religious diversity (Modood & Sealy, 2022; Sealy & Modood, 2022).

Regional studies further demonstrate that these arrangements are shaped by distinctive historical and political trajectories in Central and Eastern Europe (Vékony et al., 2022) and South and Southeast Asia (Sealy et al., 2022), while recent public-administration scholarship confirms that religion and faith can influence administrative systems, public-service provision, accountability, and broader governance processes (Ongaro & Tantardini, 2024). State–religion relations should therefore be understood not simply as a constitutional matter but as a continuing governance challenge involving institutions, policies, administrative practices, and interactions between public authorities and diverse social actors. In this study, contemporary democracies are electoral and liberal democracies as classified in regime-type research (Lührmann et al., 2018); evidence from hybrid or non-democratic contexts (Malaysia, MENA, Russia) serves only as contrast.

These debates extend a long normative literature. Stepan's "twin tolerations" require that religious authorities and democratic institutions each respect the other's autonomy (Stepan, 2000); Bhargava's "principled distance" allows the state to engage religions differently when this serves equality (Bhargava, 1998); Kuru distinguishes assertive from passive secularism (Kuru, 2009); and Fox maps religion-and-state regimes across countries (Fox, 2015). These typologies classify arrangements and justify them normatively; the present study asks instead how arrangements are implemented and with which outcomes.

A central problem, however, is that formal commitments to religious freedom and equal citizenship do not necessarily produce substantive equality in practice. Cross-national research demonstrates a persistent gap between constitutional promises and state practices, although stronger constitutional commitments to religious equality can contribute to lower discrimination against religious minorities (Finke & Mataic, 2021;

Grim & Finke, 2011). Inequalities may also emerge during implementation: public organizations that formally endorse religious tolerance can develop informal practices that impede accommodation or generate unequal treatment (Apelt et al., 2023).

At the level of lived citizenship, Muslim minorities may encounter stereotyping, misrecognition, and inequalities that weaken experiences of belonging despite formal citizenship rights (Elsayed, 2023), while more recent comparative evidence shows that the relationship between religious identity and social integration is significantly conditioned by institutional and urban contexts (Abbas & Khattab, 2026). Moreover, accommodation itself is not normatively uncomplicated, because measures intended to protect group-based religious practices may create tensions with individual autonomy or gender equality within communities (Tirosh, 2024). These tensions reinforce continuing debates over whether democratic neutrality should primarily require institutional distance from religion or permit differentiated forms of recognition and accommodation in pursuit of substantive equality (Gülalp, 2023).

The state of the art consequently focuses less on whether religion should have a public role and increasingly on how state involvement with religion is organized and what consequences different arrangements produce. Comparative analyses reveal substantial cross-country variation in the regulation of religion even among democracies, indicating that institutional categories alone cannot capture the complexity of state–religion relations (Ettensperger & Schleutker, 2022). Regionally grounded studies similarly show that formal institutional arrangements are continuously negotiated through interactions among political authorities, religious actors, and historically embedded norms (Fahmi & Lahlou, 2022).

Research has also begun to examine specific democratic outcomes of state support for religion. Fox and Breslawski (2023), for example, identify important relationships between state religious support and perceptions of government legitimacy, while Fox, Eisenstein, and Breslawski (2024) find an association between state support for religion and generalized social trust. These findings demonstrate that state involvement with religion can produce different and potentially competing consequences depending on the institutional and social context in which it operates. Recent scholarship therefore increasingly conceptualizes political secularisms as plural arrangements that should be evaluated in relation to their treatment of religious and ethnoreligious minorities rather than against a single universal model of secularism (Modood & Sealy, 2026).

Despite these advances, the literature remains fragmented across several analytical traditions. Comparative studies map modes of religious governance and institutional variation (Modood & Sealy, 2022; Sealy & Modood, 2022), constitutional research examines the relationship between formal equality and discrimination (Finke & Mataic, 2021), organizational studies investigate the implementation of religious accommodation (Apelt et al., 2023), and another strand considers consequences such as governmental legitimacy, social trust, belonging, and integration (Abbas & Khattab, 2026; Fox & Breslawski, 2023; Fox et al., 2024).

What remains less developed is an integrated explanation of how institutional arrangements are translated through policy and administrative practices into substantive

democratic outcomes for religious majorities, minority communities, internally diverse religious constituencies, and nonreligious citizens. Addressing this gap, the present study reconceptualizes state–religion relations as a multidimensional governance process linking institutional design, policy implementation, and democratic outcomes. Its novelty lies in bringing equal citizenship, freedom of conscience, non-discrimination, political voice, individual autonomy, access to public resources, and social trust into a common analytical perspective, thereby shifting the central question from which state–religion model is formally preferable to the conditions under which different forms of state engagement with religion support or constrain inclusive democratic governance.

This contribution is deliberately specific. Modood and Sealy (2022) and Sealy and Modood (2022) already conceptualize governance beyond the separation–establishment binary, and Ongaro and Tantardini (2024) and Golan-Nadir (2024) treat implementation as a distinct administrative stage. What this study adds is their systematic linkage to several outcome dimensions, of which freedom of conscience, access to public resources, and remedy remain conceptual (Figure 1).

Problem Identification

The central problem is not merely the absence or presence of formal guarantees of religious freedom and equality, but the persistent gap between institutional commitments and substantive governance outcomes. Constitutional promises of religious equality can be associated with lower discrimination against religious minorities, yet formal guarantees do not by themselves eliminate restrictions, unequal administrative treatment, or implementation gaps (Finke & Mataic, 2021). At the same time, contemporary democracies govern religious diversity through heterogeneous combinations of separation, recognition, accommodation, cooperation, and regulation that are shaped by different historical, institutional, and political contexts (Modood & Sealy, 2022; Sealy & Modood, 2022).

The resulting analytical problem is therefore to explain how and under what institutional and administrative conditions different forms of state engagement with religion are translated into equal citizenship, non-discrimination, meaningful political voice, individual autonomy, fair access to public resources, and inclusive governance for both religious and nonreligious citizens.

Research Questions

1. How does the comparative literature characterize the relationship between institutional arrangements and religious-policy practices, on the one hand, and equal citizenship and non-discrimination for religious and nonreligious citizens, on the other?
2. Under what institutional and administrative conditions does the literature associate separation, cooperation, recognition, accommodation, and regulation with more or less inclusive governance?

3. What does the literature suggest about how participatory arrangements relate to political voice, individual autonomy, and the representation of minority, internally diverse, and nonreligious constituencies?

Research Objectives and Significance

Accordingly, this study aims to examine how institutional arrangements and religious-policy practices shape substantive democratic inclusion; to identify the institutional and administrative conditions under which separation, cooperation, recognition, accommodation, and regulation support or constrain equal citizenship and rights protection; and to analyze how participatory and accountability mechanisms influence political voice, individual autonomy, representation, and access to public resources among religious and nonreligious citizens.

Theoretically, the study contributes by connecting three dimensions that are often examined separately—institutional design, policy implementation, and democratic outcomes—and by integrating equal citizenship, freedom of conscience, non-discrimination, political voice, individual autonomy, resource access, and social trust within a common analytical perspective on state–religion relations.

Practically, it provides an analytical basis for policymakers and public administrators to assess religious policies according to transparent, non-discriminatory, accountable, and rights-sensitive criteria, particularly in the design of accommodation, institutional recognition, consultation, public partnerships, and mechanisms for addressing unequal treatment. The framework is also relevant to Indonesian religious policy, where the state recognizes religions without establishing one; an illustrative application is offered in the Discussion.

LITERATURE REVIEW

Recent scholarship has increasingly examined state–religion governance through the institutional and administrative mechanisms by which public authorities engage religious actors, rather than only through formal constitutional arrangements. At the urban level, different administrative strategies can emerge even within the same national setting, as illustrated by contrasting approaches to religious accommodation in Barcelona and Madrid (Astor et al., 2019). Public funding and service partnerships further complicate institutional boundaries because religious organizations may simultaneously retain associational autonomy and perform publicly supported functions (Perez, 2023).

Religion is therefore relevant to public administration at the individual, organizational, and system levels, affecting service delivery, collaborative governance, bureaucratic discretion, and accountability (Ongaro & Tantardini, 2024). At the frontline, religion-based policies can shape how street-level bureaucrats exercise discretion and provide services (Golan-Nadir, 2024), while experimental evidence from public schools demonstrates that citizens may receive different administrative responses according to signaled religious or nonreligious identities (Pfaff et al., 2021).

Organizational rules are equally consequential: formal commitments to tolerance may coexist with informal mechanisms that impede religious accommodation in schools, hospitals, and other human-service institutions (Apelt et al., 2023). Faith-based organizations involved in social-service provision likewise develop distinctive governance practices as they respond simultaneously to organizational missions, beneficiaries, and institutional demands (Jacinto et al., 2023). Taken together, these studies locate religious governance within the practical allocation of recognition, services, organizational access, administrative discretion, and public accountability.

A second strand of scholarship demonstrates that recognition and accommodation are themselves selective governance processes, because public institutions must determine which practices, identities, and representatives qualify for protection or institutional acknowledgement. Majority religious traditions may retain advantages when historically religious symbols and practices are reconstructed as national culture or heritage, thereby making their continued public presence appear less religious than comparable minority claims (Johnsen & Johansen, 2021; Taira & Beaman, 2022).

Legal interpretations of religious symbols can also reproduce majoritarian assumptions about which manifestations of belief are considered legitimate, voluntary, or sufficiently religious to warrant protection (Pirosa, 2021). Measures of religious freedom themselves may obscure such contextual differences when standardized indicators do not fully correspond to the institutional realities through which rights are exercised (Kühle, 2022). Accommodation further creates a tension between collective recognition and individual autonomy: policies designed to accommodate religious communities may become problematic when consent, gender equality, or meaningful opportunities to exit or dissent are inadequately protected (Tirosh, 2024).

Administrative recognition can also determine whether an individual right is practically exercisable; research on religious conversion in Malaysia shows how bureaucratic procedures and standards of administrative "reasonableness" can substantially condition the operationalization of religious self-identification (Nelson & Shah, 2018). The literature thus suggests that inclusive accommodation must be evaluated not simply by whether recognition is granted, but by how claims are classified, whose representation is institutionalized, whether comparable claims are treated consistently, and whether individual members remain protected within collectively recognized arrangements. Comparable issues arise in Indonesia, where recognition of religion in identity documents and the status of adherents of indigenous beliefs were reshaped by Constitutional Court Decision No. 97/PUU-XIV/2016 (Constitutional Court of the Republic of Indonesia, 2017).

The literature becomes particularly fragmented when these institutional mechanisms are traced across levels of governance and through implementation. Local authorities are not merely passive executors of national religious policy; their political incentives, administrative practices, and relationships with religious organizations can reshape regulatory outcomes. Mekawi (2026), for example, demonstrates that mosque-recognition outcomes in Belgium vary through strategic interaction between local political authorities and Muslim leaders, while Ryu (2025) shows how local administrative

action, inaction, and regulatory uncertainty influenced a mosque-construction conflict involving a Muslim minority in South Korea.

Participatory arrangements add another layer: interreligious bodies increasingly enter local policy processes, yet their democratic significance depends on actual inclusion in decision-making and the representativeness of participating actors rather than consultation alone (Ozzano, 2026). Comparative scholarship has developed increasingly sophisticated accounts of the governance of religious diversity and its interregional variation (Modood & Sealy, 2022; Sealy & Modood, 2022), but these accounts do not by themselves resolve how recognition, frontline administration, organizational practices, representative access, resource allocation, and accountability combine to shape substantive inclusion.

The unresolved issue is therefore not the absence of scholarship on any individual mechanism, but the limited integration of these mechanisms into a connected account of how religious policy travels from institutional rules through administrative and participatory processes to distributive and democratic consequences. The present study addresses this gap by examining the linkage among institutional recognition, administrative implementation, political participation, resource access, individual autonomy, accountability, and remedy as interconnected dimensions of inclusive state–religion governance.

THEORETICAL AND CONCEPTUAL FRAMEWORK

Theoretical Framework

This study integrates two complementary theoretical lenses: the governance of religious diversity and policy implementation in public administration. The governance-of-religious-diversity perspective provides the macro-institutional lens for interpreting how democratic states structure relations with religious and nonreligious actors. Rather than prescribing a single institutional arrangement, this perspective directs attention to the norms and institutional configurations through which recognition, accommodation, cooperation, and public authority are organized across different political contexts (Modood & Sealy, 2022; Sealy & Modood, 2022).

Its analytical role in this study is therefore specific: it identifies how institutional arrangements establish the formal opportunities and constraints within which religious diversity is governed. The framework does not treat a particular mode of state–religion relations as inherently inclusive; instead, institutional arrangements provide the starting conditions whose practical implications must be examined through governance processes and their consequences.

The governance-of-religious-diversity perspective is a comparative framework rather than an explanatory theory; it supplies the proposition that similar formal arrangements can embody different norms and therefore operate differently. The normative anchor for the outcome dimensions is recognition theory: Taylor (1994) links equal dignity to the recognition of identities, and Fraser (2000) defines justice as participatory parity, which

justifies assessing arrangements by equal citizenship, non-discrimination, and political voice rather than by formal status alone.

The public-administration perspective provides the complementary implementation lens. Religion-related policy does not move automatically from formal rules to uniform outcomes because implementation occurs through organizations, administrative systems, and interactions between officials and citizens (Ongaro & Tantardini, 2024). At the frontline, bureaucratic discretion can influence how religion-related rules and services are interpreted and delivered, making implementation an analytically distinct stage rather than a mechanical extension of formal policy (Golan-Nadir, 2024). This lens builds on street-level bureaucracy theory, which explains how frontline officials, facing scarce resources and ambiguous rules, effectively make policy through discretion (Lipsky, 2010).

Subnational research similarly demonstrates that regulatory outcomes may emerge from interactions between local authorities and religious organizations, further underscoring the importance of implementation context (Mekawi, 2026). The study therefore uses this second lens to explain how institutional rules are translated, negotiated, or modified through administrative and participatory processes. Together, the two perspectives establish a theoretically coherent sequence from institutional arrangements to governance practice, while evidence on gaps between constitutional commitments and discrimination justifies examining substantive outcomes separately from formal institutional promises (Finke & Mataic, 2021).

Conceptual Framework

The conceptual framework positions state–religion governance as an interconnected relationship among institutional arrangements, governance processes, and democratic outcomes. The institutional-arrangement dimension captures the formal architecture through which public authorities structure relations with religious and nonreligious actors, including recognition, accommodation, institutional cooperation, public support, and access to state institutions. This dimension draws on comparative approaches that conceptualize the governance of religious diversity through multiple legal, institutional, and political configurations rather than a single model of state–religion relations (Modood & Sealy, 2022; Sealy & Modood, 2022).

The governance-process dimension concerns the translation of these arrangements into administrative practice through interpretation, bureaucratic discretion, service provision, consultation, representation, coordination, and accountability. Public-administration scholarship demonstrates that religion operates across micro-, meso-, and macro-levels of administration and may influence organizational practices, public services, governance arrangements, legitimacy, and accountability (Ongaro & Tantardini, 2024). At the frontline level, religion-related policies may also be shaped by the discretion exercised by street-level bureaucrats, reinforcing the analytical distinction between formal policy and its practical implementation (Golan-Nadir, 2024).

The democratic-outcome dimension captures the substantive consequences associated with these institutional and administrative processes, including equal citizenship,

freedom of conscience, non-discrimination, political voice, individual autonomy, access to public resources, social trust, accountability, and access to remedy. The framework therefore distinguishes formal commitments from the outcomes actually experienced by citizens, a distinction supported by evidence showing that constitutional promises of religious equality do not necessarily correspond directly with state practices toward religious minorities (Finke & Mataic, 2021).

The analytical relationship among the three dimensions is expressed as institutional arrangements → governance processes → democratic outcomes. This sequence does not presume a deterministic causal pathway; rather, it recognizes that similar institutional arrangements may generate different consequences when translated through different administrative and political contexts. Subnational evidence from Belgium, for example, suggests that regulatory outcomes concerning mosque recognition can vary through strategic interactions between local officials and religious leaders even within the same national setting (Mekawi, 2026).

Accordingly, the framework treats inclusive state–religion governance as the substantive alignment of institutional rules, implementation practices, participation, accountability, and rights protection, while allowing for contextual variation across democratic systems. Figure 1 visualizes the framework. Societal conditions—regime type, religious demography, majority–minority relations, and civil-society mobilization—are treated as contextual conditions, and outcomes such as legitimacy and trust can feed back into institutional arrangements.

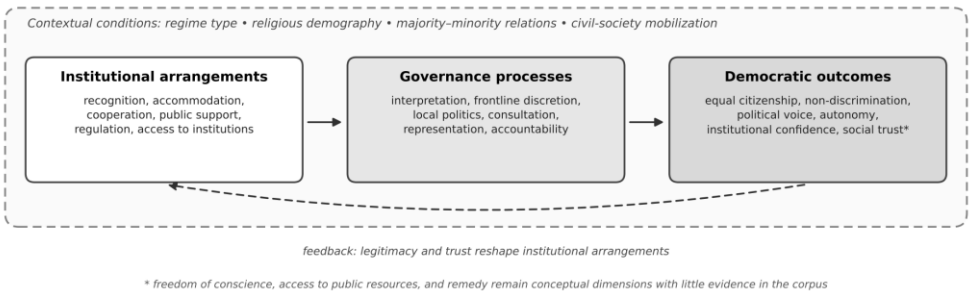


Figure 1. Conceptual framework of state–religion governance (analytical, not causal; source: authors' elaboration)

METHODOLOGY

This study employed a qualitative comparative conceptual analysis to examine state–religion governance in contemporary democratic contexts. The design was selected because the study seeks to integrate and interpret relationships among institutional structures, administrative processes, and substantive democratic consequences rather than estimate statistical effects or compare countries through a standardized ranking. Conceptual research is appropriate when the purpose is to connect dispersed bodies of knowledge, clarify analytical relationships, and generate a coherent interpretation of an established research problem (Jaakkola, 2020). Accordingly, insights from political science, public administration, socio-legal scholarship, and studies of religion and governance were brought together to support comparative interpretation across

different democratic settings. Among the conceptual-paper types distinguished by Jaakkola (2020), the study follows theory synthesis; its units of comparison are institutional arrangements and outcome dimensions across national and subnational settings.

The analytical material consisted of peer-reviewed scholarship and comparative secondary evidence relevant to state–religion relations, religious-diversity governance, public administration, recognition, accommodation, participation, and institutional accountability. Sources were considered on the basis of their substantive relevance to the study's analytical dimensions rather than through a claim of exhaustive or systematic coverage. Of the 32 references, 30 constitute the substantive evidence base, namely cross-national quantitative studies, single-country and local case studies, a correspondence experiment, legal and conceptual analyses, and literature reviews, while two (Braun & Clarke, 2021; Jaakkola, 2020) are methodological references. "Comparative secondary evidence" therefore refers to the published findings of these studies, not to primary data or independently compiled datasets. Fifteen studies are analyzed in the Results (Table 1); the remainder provide context (Appendix Table A1). Particular attention was given to evidence concerning the operation of institutional rules, their implementation by national and subnational authorities, interactions between public institutions and religious organizations, and their implications for religious and nonreligious citizens. This approach enabled comparison across different governance settings while retaining the contextual features reported in the original studies. The evidence is concentrated in Western Europe, Israel, the United States, South Korea, and Malaysia, complemented by regional overviews of Central and Eastern Europe, the Middle East and North Africa, and South and Southeast Asia (Fahmi & Lahlou, 2022; Sealy et al., 2022; Vékony et al., 2022). Indonesia is not examined directly. The findings are therefore presented as patterns identified in this evidence base, and their transfer to other democratic contexts, including Indonesia and the wider Global South, requires further study.

The analysis proceeded through a theory-guided thematic comparison. Evidence was organized around three analytical domains derived from the conceptual framework: institutional arrangements, including recognition, accommodation, public support, and institutional cooperation; governance processes, including administrative interpretation, bureaucratic discretion, consultation, representation, service provision, coordination, and accountability; and democratic outcomes, including equal citizenship, freedom of conscience, non-discrimination, political voice, individual autonomy, access to public resources, social trust, and remedy.

These domains functioned as sensitizing concepts rather than rigid categories, allowing additional relationships and tensions to emerge during analysis. Themes were refined iteratively through comparison of convergent, divergent, and context-dependent evidence, following thematic synthesis of published findings (Thomas & Harden, 2008) rather than reflexive thematic analysis of primary data (Braun & Clarke, 2021). Findings were recorded in an extraction template (context, design, feature, condition, outcome, direction); the first and second authors coded the studies and resolved disagreements through discussion. Two distinctions emerged beyond the predefined domains: collective

access versus individual protection, and participation versus representation. Evidential strength was considered by weighting experimental and cross-national studies above single cases and treating reviews and conceptual analyses as interpretive rather than empirical support (Table 1).

Comparative conceptual synthesis was then used to integrate the identified patterns across analytical domains. The synthesis focused on the relationships among institutional rules, administrative and participatory mechanisms, and substantive inclusion, while giving attention to contradictory findings and contextual differences. Rather than treating recognition, accommodation, cooperation, or separation as inherently beneficial or detrimental, the analysis examined the conditions under which their consequences varied across governance settings. This process produced an integrated interpretation of state–religion governance while maintaining a clear distinction between evidence reported in the underlying studies and the broader conceptual conclusions developed through comparative synthesis.

RESULTS AND DISCUSSION

Research Findings

The comparative conceptual analysis identified three interconnected patterns in contemporary state–religion governance. The first concerned the relationship between formal institutional arrangements and substantive democratic inclusion, the second concerned the administrative and contextual processes through which those arrangements were implemented, and the third concerned the relationship between participation and representation and their consequences for political voice and inclusion. Pattern 1 addresses RQ1, Pattern 2 RQ2, and Pattern 3 RQ3; the collective–individual and participation–representation distinctions go beyond the a priori framework. Most patterns rest on one to three studies, so they are propositions rather than established regularities.

Across the analyzed evidence, no single institutional arrangement displayed a uniform relationship with all dimensions of democratic inclusion. Instead, variation occurred between formal rules, their administrative application, and the outcomes reported for religious and nonreligious constituencies. These patterns are consistent with comparative approaches that conceptualize the governance of religious diversity as involving multiple configurations of legal, institutional, and political arrangements rather than a single separation–establishment continuum (Modood & Sealy, 2022; Sealy & Modood, 2022). Table 1 summarizes the evidence used to identify these recurring relationships. The table lists the empirical and analytical studies whose findings are reported in this section, with the study type given in the first column because the strength of evidence differs across designs. The comparative frameworks of Modood and Sealy (2022) and Sealy and Modood (2022) serve as interpretive reference points and are not tabulated, and four studies from the Literature Review have been added (Astor et al., 2019; Nelson & Shah, 2018; Ryu, 2025; Taira & Beaman, 2022).

Table 1. Comparative Evidence and Analytical Patterns in State–Religion Governance

Source and Context	Institutiona / Policy Feature	Governance Condition	Reported Evidence	Analytical Pattern
Finke & Mataic (2021), cross-national religious-minority context (cross-national quantitative study)	Constitutional equality guarantees	State implementation	Equality guarantees were associated with lower discrimination, but implementation gaps remained.	Formal protection–practice gap
Ettensperger & Schleutker (2022), cross-country regulation of religion (cluster analysis)	Religious regulation	National regulatory configuration	Religious regulation varied substantially across national contexts.	Institutional variation
Apelt et al. (2023), German schools, hospitals, and swimming pools (comparative organizational study)	Religious accommodation	Formal and informal organizational rules	Informal organizational practices sometimes restricted accommodation.	Implementation divergence
Pfaff et al. (2021), American public school principals (correspondence experiment)	Administrative response to signaled identity	Frontline discretion	Administrative responses differed according to signaled religious or nonreligious identities.	Differential treatment
Ongaro & Tantardini (2024), public-administration scholarship (literature review) [conceptual source]	Religion in public administration	Individual, organizational, and system levels	Religion, faith, and spirituality interact with public administration across levels.	Multilevel administration
Golan-Nadir (2024), street-level bureaucracy theory in democracies (conceptual analysis) [conceptual source]	Religion-related policy implementation	Street-level bureaucratic discretion	Discretion at the frontline can affect the delivery of public services.	Frontline implementation
Mekawi (2026), mosque recognition in Belgium (case study)	Institutional recognition	Local political context and state–religious actor interaction	Recognition outcomes varied across local political settings.	Context-dependent implementation
Tirosh (2024), religious accommodation in Israel (legal case study)	Religious and multicultural accommodation	Consent, exit, and equality safeguards	Accommodation generated tensions involving autonomy, consent, and sex equality.	Collective–individual rights tension
Ozzano (2026), European local governance (qualitative political-science analysis)	Interreligious participation	Incorporation into local policymaking	Interreligious actors increasingly participated in local policy processes.	Expanded participatory access
Fox & Breslawski (2023), 54 Christian-majority countries	State support for religion	Funding and institutional entanglement	Greater state religious support was associated with lower	Outcome-specific association

(cross-national quantitative study)			institutional confidence.	
Fox et al. (2024), cross-national analysis (quantitative; Religion and State and World Values Survey data)	State support for religion	State- and individual-level conditions	State religious support was positively associated with generalized social trust.	Outcome multidimensionality
Astor et al. (2019), Barcelona and Madrid (comparative urban case study)	Local accommodation strategy	City-level administrative approach	Hands-on and hands-off approaches differed between cities in one national framework.	Subnational variation
Ryu (2025), South Korea (case study)	Regulation of places of worship	Local administrative action and uncertainty	Local administrative choices shaped a mosque-construction conflict.	Context-dependent implementation
Nelson & Shah (2018), Malaysia (legal analysis)	Administrative recognition of religious status	Administrative "reasonableness" standards	Bureaucratic procedures conditioned whether individuals could change recorded religion.	Collective–individual rights tension
Taira & Beaman (2022), Finland (legal and qualitative analysis)	Majority religion as cultural heritage	Cultural justification	Majority practices justified as culture disadvantaged nonreligious citizens.	Unequal treatment of nonreligion

As shown in Table 1, the first recurring pattern was a distinction between formal institutional protection and substantive inclusion. Finke and Mataic (2021) found that constitutional promises of religious equality were associated with lower discrimination against religious minorities, while also identifying a substantial gap between constitutional commitments and state practices. Ettensperger and Schleutker (2022) similarly documented considerable variation in the regulation of religion across countries and showed that empirical classifications were sensitive to the indicators used to construct them.

Taken together, these findings indicate that constitutional equality, legal recognition, regulation, and governmental involvement establish the institutional conditions within which religious diversity is governed, but they do not determine substantive outcomes independently of implementation. This interpretation corresponds with Modood and Sealy's (2022) comparative account, in which different modes of governing religious diversity reflect distinct political, institutional, theological, and historical inheritances. Sealy and Modood (2022) likewise showed that formal accommodation and freedom of religion must be examined alongside the wider dynamics through which diversity is governed. Formal institutional arrangements therefore provide the structure of state–religion relations, whereas their substantive significance depends on how those arrangements operate in practice.

This distinction helps explain why the conventional separation between secular and religious institutional models provides only a partial account of democratic inclusion.

Ettensperger and Schleutker (2022) identified both low- and high-regulation clusters among democratic countries, while also showing substantial internal variation within those classifications. The analytical implication is not that institutional differences are unimportant, but that the same broad institutional category may contain different combinations of support, restriction, recognition, and regulation. Modood and Sealy (2022) similarly emphasized that governance arrangements vary both between and within world regions and are shaped by historically specific state–religion connections. The synthesis adds a typology of implementation gaps: informal organizational rules (Apelt et al., 2023), frontline discretion (Pfaff et al., 2021), subnational political bargaining (Mekawi, 2026), and administrative classification of religious status (Nelson & Shah, 2018).

The comparative evidence in the present synthesis therefore suggests that equal citizenship cannot be inferred simply from the formal presence or absence of establishment, cooperation, recognition, or separation. Instead, formal arrangements establish opportunities and constraints whose effects become visible through administrative and organizational processes. This places implementation at the center of the relationship between institutional design and substantive inclusion. Because Ettensperger and Schleutker (2022) measure regulation rather than equal-citizenship outcomes, this inference rests mainly on Finke and Mataic (2021).

The second recurring pattern concerned precisely this translation of institutional arrangements into administrative practice. Apelt et al. (2023) showed that German schools, hospitals, and swimming pools could formally endorse tolerance while simultaneously relying on organizational mechanisms that complicated or restricted the accommodation of Muslim religious practices. At the micro level of public administration, Golan-Nadir (2024) identified religion-related policy implementation as a domain in which street-level bureaucratic discretion can affect the delivery of public services. Ongaro and Tantardini (2024) similarly showed that religion, faith, and spirituality interact with public administration across individual, organizational, and system levels, including bureaucratic discretion, public-service delivery, collaborative governance, and accountability. The strongest causal evidence comes from a correspondence experiment in which American public school principals responded differently to requests signaling different religious or nonreligious identities (Pfaff et al., 2021).

These studies indicate that administrative institutions are not merely passive channels through which constitutional rules are transmitted. Organizational routines, discretionary judgment, interpretation of policy, and service-delivery practices influence how formal state–religion arrangements are experienced in concrete institutional settings. The distinction between formal policy and implemented policy is therefore a recurring feature of the comparative evidence rather than an exceptional condition.

Subnational evidence reinforces this pattern by showing that implementation may also vary within a single national institutional setting. Mekawi (2026), examining mosque recognition in Belgium, reported variation in regulatory outcomes across regional contexts and related these differences to interactions between political authorities and Muslim leadership. This finding suggests that national recognition systems do not

eliminate the influence of local political and organizational conditions. When considered alongside Apelt et al. (2023) and Golan-Nadir (2024), the evidence points to implementation as a multilevel process involving national rules, subnational institutions, organizations, and frontline administrators. Subnational variation also appears in Spain, where Barcelona and Madrid adopted hands-on and hands-off approaches to accommodation (Astor et al., 2019), and in South Korea, where local administrative inaction shaped a mosque-construction conflict (Ryu, 2025).

The same formal commitment can consequently acquire different practical meanings as it moves across these levels. This observation is consistent with the broader public-administration literature, which treats organizational and administrative contexts as important components of policy implementation (Ongaro & Tantardini, 2024). The relationship between state–religion policy and substantive inclusion is therefore conditional on how rules are interpreted and operationalized rather than being automatically determined by their formal wording.

The analysis of recognition and accommodation revealed a further distinction between collective institutional access and individual-level protection. Accommodation can reduce barriers experienced by religious communities by enabling participation without requiring the abandonment of religious practices, yet collective recognition does not automatically resolve questions concerning individual autonomy within those arrangements. Tirosh (2024), using Israeli law as a case study, showed that accommodation of inegalitarian religious practices can generate tensions involving consent, sex equality, and the meaningful possibility of exit when community norms extend beyond internal religious settings into wider public life.

The evidence therefore contained two analytically distinct dimensions: the institutional inclusion afforded to religious communities and the protection retained by individuals affected by collectively recognized arrangements. Sealy and Modood (2022) similarly emphasized that accommodation of religious diversity and protection of individual equality need to be pursued alongside one another rather than treated as interchangeable objectives. Recognition may consequently broaden institutional access while still requiring examination of internal diversity, consent, and individual freedom. This distinction is particularly important for evaluating state–religion arrangements in terms of both collective religious freedom and equal citizenship. The tension also differs by regime: in Malaysia, administrative standards of "reasonableness" condition whether individuals can leave a recognized religious status (Nelson & Shah, 2018), so collective recognition can constrain individual exit through bureaucratic rather than communal means.

The third pattern concerned participatory access and representative inclusion. Ozzano (2026) documented the increasing involvement of interreligious bodies in European local governance, including a shift from primarily dialogue-oriented functions toward more explicitly political and institutional roles in policymaking. This evidence indicates that religious organizations may participate as governance actors rather than functioning solely as objects of state regulation. However, the presence of consultation does not by itself establish the breadth or quality of representation. The claim that organizational

consultation does not equal representation of all members is therefore a conceptual argument; the only empirical indication available comes from Indonesia, where interreligious harmony forums have drawn their membership largely from leaders of recognized religions (Jati et al., 2024).

Across the comparative evidence, participatory arrangements differed according to which organizations obtained institutional access, what role they received in policymaking, and how closely consultation was connected to decision-making processes. Modood and Sealy (2022) conceptualized governance broadly enough to include legal and policy measures as well as relationships and cooperation between state and civil-society actors, while Sealy and Modood (2022) emphasized the dynamic nature of these governance arrangements. Participation must therefore be analytically distinguished from representation: consultation indicates access to a governance process, whereas representative inclusion concerns whose interests and voices are incorporated within that process.

This distinction also clarifies the position of internally diverse religious communities and nonreligious constituencies within participatory governance. Religious organizations may possess organizational resources and institutional recognition that make them effective interlocutors for government, but formal participation by an organization cannot automatically be treated as equivalent to representation of every member associated with that religious tradition. The tension identified by Tirosh (2024) between collective accommodation and individual autonomy illustrates why these levels of representation require separate consideration. Evidence on nonreligious citizens remains thin: beyond Pfaff et al. (2021), Taira and Beaman (2022) show how majority practices justified as culture can disadvantage nonreligion in Finland, and this remains a gap in the evidence base.

Ozzano's (2026) analysis similarly showed that the political role of interreligious organizations depends on how they are incorporated into local governance structures. In this sense, meaningful political voice involves more than the simple existence of religious consultation; it also depends on the institutional position of participating actors and the scope of constituencies represented through them. The comparative synthesis therefore identified participation, representation, and individual autonomy as related but analytically distinct components of inclusive state–religion governance. Treating them separately avoids assuming that organizational inclusion necessarily produces equivalent inclusion for all citizens.

The evidence concerning democratic outcomes further indicated why state–religion arrangements should be examined across multiple outcome dimensions. Fox and Breslawski (2023), using data from 54 Christian-majority countries and 126 country-years, reported that higher overall state support for religion was associated with lower confidence in government and parliament, while different forms of state support displayed different relationships with institutional confidence.

Fox, Eisenstein, and Breslawski (2024), using Religion and State and World Values Survey data, found a positive association between state support for religion and generalized social trust. These findings concern distinct dependent outcomes and should therefore

not be collapsed into a single measure of democratic inclusion. Institutional confidence captures evaluations of political institutions, whereas generalized social trust concerns expectations toward other members of society. The coexistence of different associations across these outcomes indicates that the consequences of state support cannot be adequately represented by a single positive or negative classification. Democratic outcomes in state–religion governance are consequently better treated as multidimensional, encompassing equality, non-discrimination, political voice, autonomy, institutional confidence, social trust, and access to public institutions and resources. The contrast may reflect different samples (Christian-majority countries versus a broader set), different outcomes (evaluations of institutions versus interpersonal expectations), and different types of support; both studies come from the same research team and the Religion and State dataset, which limits independent corroboration. Accountability and remedy receive no direct evidence here.

Discussion

Taken together, the integrated analysis indicates a consistent relationship among the three analytical dimensions employed in the study. Institutional arrangements structure formal rights, recognition, public support, and institutional access; governance processes shape how those arrangements are interpreted and implemented; and democratic outcomes reflect their differentiated consequences across citizens, organizations, and institutional settings. Variation may occur at each point in this relationship: constitutional equality can coexist with implementation gaps, similar national arrangements can produce different organizational or subnational practices, collective accommodation can expand institutional access while raising separate questions about individual autonomy, and similar forms of state engagement can display different associations across democratic outcomes.

This pattern is consistent with comparative research showing both substantial variation in state–religion configurations and the importance of examining their practical governance dynamics rather than treating formal institutional categories as sufficient explanations (Modood & Sealy, 2022; Sealy & Modood, 2022). The combined evidence therefore supports a context-sensitive interpretation of state–religion governance in which formal arrangements, administrative implementation, participation, representation, and substantive outcomes are examined in relation to one another. Such an interpretation keeps the analysis focused on how state–religion policies operate and what patterns they produce across different dimensions of democratic governance. For policy and administrative practice, this implies that religious policy should be assessed not only through its formal rules but also through how those rules are applied by frontline and local authorities, how participation is structured, and which outcomes are monitored. Concrete tools include correspondence audits of frontline treatment, as in Pfaff et al. (2021), monitoring the consistency of recognition decisions across localities, and periodic review of the composition of consultation bodies.

Compared with established typologies, the framework explains variation within a given regime type. Twin tolerations, principled distance, and the assertive–passive distinction

(Bhargava, 1998; Kuru, 2009; Stepan, 2000) classify arrangements and their justifications, but they do not predict why Barcelona and Madrid, or Belgian localities, implement the same national rules differently. A competing interpretation holds that establishment and high state regulation systematically disadvantage minorities (Fox, 2015; Grim & Finke, 2011); the evidence here does not refute this but suggests that implementation can widen or narrow such disadvantage. The framework's boundary conditions include regime type, religious demography, and majority–minority relations, which shape what implementation can achieve.

Indonesia illustrates an arrangement beyond separation and establishment: the state recognizes several religions and administers religious affairs through a ministry without establishing a single religion (Menchik, 2016). Applied to this setting, the framework directs attention to institutional arrangements, such as the recognition of indigenous-belief adherents in population records (Constitutional Court of the Republic of Indonesia, 2017); to governance processes, such as whether local civil-registration and religious-affairs offices apply this recognition consistently; and to participation, such as the representativeness of interreligious harmony forums (Jati et al., 2024). This application is illustrative and not part of the analyzed evidence.

Novelty and Contribution

Building on comparative frameworks that already move beyond the separation–establishment binary, the contribution of this study is more modest and specific: the systematic linkage of comparative governance frameworks with implementation research and multiple outcome dimensions. By linking institutional arrangements, governance processes, and democratic outcomes, the study provides a framework for explaining how formal commitments to recognition, accommodation, cooperation, and equality are translated, through administrative and participatory practice, into equal citizenship, freedom of conscience, non-discrimination, political voice, individual autonomy, access to public resources, and social trust. This perspective extends comparative accounts of the governance of religious diversity (Modood & Sealy, 2022; Sealy & Modood, 2022) and public-administration scholarship on religion (Ongaro & Tantardini, 2024) by integrating them into a single sequence that treats implementation as an analytically distinct stage, and by shifting the central question from which state–religion model is formally preferable to the conditions under which different forms of state engagement with religion support or constrain inclusive governance.

The study also distinguishes collective institutional access from individual-level protection, and participation from representation, thereby clarifying that organizational inclusion does not automatically produce inclusion for all citizens and that democratic outcomes are multidimensional rather than reducible to a single positive or negative classification. Practically, the framework can support policymakers and public administrators in assessing religious policies according to transparent, non-discriminatory, accountable, and rights-sensitive criteria, particularly in the design of accommodation, recognition, consultation, and public partnerships, and in monitoring whether comparable religious and nonreligious claims are treated consistently.

Limitations and Suggestions for Further Research

This study is limited by its qualitative, conceptual design and its reliance on secondary sources. Sources were selected for their substantive relevance rather than through a systematic search, so the synthesis cannot claim exhaustive coverage and relevant studies may have been omitted. The evidence is also concentrated in Western Europe, Israel, the United States, South Korea, and Malaysia, with Indonesia and most of the Global South not examined directly, which restricts the extent to which the findings can be generalized to other democratic and religious contexts. In addition, the reviewed studies combine cross-national quantitative associations, case studies, an experiment, and conceptual analyses that differ in evidential strength; the relationships identified among institutional arrangements, governance processes, and democratic outcomes should therefore be read as analytical patterns and propositions rather than causal effects. Finally, the study draws on no primary data. In addition, the Results rest on fifteen studies, most patterns on one to three of them; the outcome analysis relies on two studies by the same research team; and freedom of conscience, access to public resources, and remedy lack evidence.

Future research should therefore adopt systematic and transparent search and selection procedures, and extend the evidence base to Indonesia and other Global South contexts through case studies and comparative field studies. Mixed-method and longitudinal designs, supported by primary data such as interviews, administrative records, or surveys, could test the propositions developed here and examine how institutional arrangements, governance processes, and democratic outcomes are related over time. Greater attention should also be given to minority, internally diverse, and nonreligious constituencies, whose experiences are less visible in the existing literature. Such research would help assess the applicability of the proposed framework across different political, religious, and governance contexts.

CONCLUSIONS

In answer to RQ1, the literature suggests that formal equality guarantees are associated with less discrimination but do not secure equal citizenship without consistent implementation. In answer to RQ2, inclusion varies with organizational rules, frontline discretion, local politics, and administrative classification rather than with the formal model. In answer to RQ3, participation of religious organizations expands access but does not by itself ensure representation of internally diverse or nonreligious constituencies.

This study concludes that state–religion relations in contemporary democracies cannot be evaluated solely through formal distinctions such as separation, establishment, cooperation, or recognition. Their implications for equality, religious freedom, non-discrimination, and equal citizenship depend substantially on how institutional arrangements are implemented through administrative and organizational processes. As a proposition for future testing, inclusive governance may be more likely when neutrality, accommodation, and recognition are applied consistently across national and local

institutions, supported by transparent procedures, accountable discretion, and comparable treatment of religious and nonreligious citizens.

Religious policies also shape political participation, access to public resources, institutional recognition, and individual autonomy, particularly when collective accommodation and representative access are balanced with protections for internal diversity and individual rights. Similarly, participatory mechanisms may be most meaningful when consultation extends beyond established religious organizations and provides fair opportunities for minority, internally diverse, and nonreligious constituencies to influence public decision-making. The practical implication is that democratic governance of religion should prioritize consistent implementation, representative participation, rights protection, and accountable institutional practice rather than relying on any single model of state–religion relations. For Indonesia, this implies monitoring the consistency of religious recognition and administrative services across regions, reviewing the representativeness of consultation bodies such as FKUB, and assessing the treatment of minority and indigenous-belief communities. These implications remain propositions, because the evidence base is small and does not include Indonesia.

AUTHOR CONTRIBUTIONS STATEMENT

Sobi Ghozani contributed to the conceptualization, methodology development, and drafting of the manuscript; **Ani Sumarni** contributed to the data synthesis, analysis, and critical revision; and **Gianno Robert Poulos** contributed to the construction of the policy framework, interpretation of the findings, and final review and approval of the manuscript.

CONFLICT OF INTEREST

The authors state that they have no competing financial, institutional, or personal interests that could have influenced the development or interpretation of this manuscript.

DECLARATION OF GENERATIVE AI USE

During manuscript preparation, generative artificial intelligence tools were used in a limited supporting capacity to assist with language editing, organization of arguments, and preparation of visual presentation. The tools were not treated as sources of evidence, and they did not replace the authors' responsibility for the research design, interpretation of the literature, verification of references, or final conclusions. All AI-assisted content was reviewed and edited by the authors, who take full responsibility for the accuracy, originality, and integrity of the manuscript.

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APPENDIX

Table A1. Substantive sources (n = 30). Role: Results = analyzed in Table 1; Reference = interpretive framework; Context = background

No	Study	Country / region	Design	Dimension(s)	Role
1	Abbas & Khattab (2026)	European cities	Quantitative	Outcomes (belonging)	Context
2	Apelt et al. (2023)	Germany	Comparative organizational	Processes	Results
3	Astor et al. (2019)	Spain	Comparative urban case	Processes	Results
4	Elsayed (2023)	United Kingdom	Qualitative	Outcomes (belonging)	Context
5	Ettensperger & Schleutker (2022)	Cross-national	Cluster analysis	Arrangements	Results
6	Fahmi & Lahlou (2022)	MENA	Regional overview	Arrangements	Context
7	Finke & Mataic (2021)	Cross-national	Quantitative	Arrangements, outcomes	Results
8	Fox & Breslawski (2023)	54 Christian-majority states	Quantitative	Outcomes (confidence)	Results
9	Fox et al. (2024)	Cross-national	Quantitative	Outcomes (trust)	Results
10	Golan-Nadir (2024)	Democracies (general)	Conceptual	Processes	Results
11	Gülalp (2023)	General	Normative	Arrangements	Context
12	Güveli & Platt (2023)	Western Europe	Quantitative	Context (religiosity)	Context
13	Jacinto et al. (2023)	Brazil	Qualitative	Processes	Context
14	Johnsen & Johansen (2021)	Norway	Qualitative	Arrangements	Context
15	Kühle (2022)	Nordic countries	Dataset analysis	Arrangements	Context
16	Mekawi (2026)	Belgium	Case study	Processes	Results
17	Modood & Sealy (2022)	Global	Comparative framework	Arrangements	Reference
18	Modood & Sealy (2026)	Global	Conceptual	Arrangements, outcomes	Context
19	Nelson & Shah (2018)	Malaysia	Legal analysis	Processes, outcomes	Results
20	Ongaro & Tantardini (2024)	General	Literature review	Processes	Results
21	Ozzano (2026)	Europe	Qualitative	Processes (participation)	Results
22	Perez (2023)	General	Legal analysis	Arrangements	Context
23	Pfaff et al. (2021)	United States	Correspondence exp.	Processes, outcomes	Results
24	Pirosa (2021)	Europe	Legal analysis	Arrangements	Context
25	Ryu (2025)	South Korea	Case study	Processes	Results
26	Sealy et al. (2022)	South/Southeast Asia	Regional overview	Arrangements	Context
27	Sealy & Modood (2022)	Inter-regional	Comparative framework	Arrangements	Reference
28	Taira & Beaman (2022)	Finland	Legal and qualitative	Arrangements, outcomes	Results
29	Tirosh (2024)	Israel	Legal case study	Outcomes (autonomy)	Results
30	Vékony et al. (2022)	CEE and Russia	Regional overview	Arrangements	Context