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Religious freedom and measures of tolerance

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This AI-generated art was produced to illustrate Helena van Coller's article on church bells and calls to prayer.

Contents

International Journal for Religious Freedom
Volume 18, Issue 2, 2025
ISSN 2070-5484 · eISSN 2790-0762

Christine Schirrmacher

"Let there be no Compulsion in Religion" (Sura 2:256)

Apostasy from Islam as judged by contemporary Islamic Theologians

Discourses on
Apostasy,
Religious Freedom,
and Human Rights

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Editorial

Religious Freedom and Measures of Tolerance

This issue had its origin in a conference on freedom of religion held at the University of Johannesburg on 11-12 April 2024. The conference was organised by the International Institute for Religious Freedom (IIRF) in collaboration with the University of Johannesburg (UJ), Rhodes University (RU) and the University of the Free State (UFS). The relaunch of the IIRF in South Africa (which had been dormant for some time) also took place at this conference.

We are pleased to welcome two guest editors for this issue. Shaun de Freitas is a professor in the Faculty of Law at the University of the Free State (UFS), South Africa, as well as the Academic Head of the Department of Public Law at the UFS. He is also an adjunct professor at the School of Law at the University of Notre Dame Australia (Sydney Campus). De Freitas teaches human rights theory and specializes in the right to freedom of religion as well as the relationship between the law, religion, and the governing authorities. De Freitas has authored a number of scholarly publications in various journals, including *the Journal of Law and Religion, Journal of Church and State, Brigham Young University Law Review, International Journal of Religious Freedom* (IJRF) and *South African Journal on Human Rights.* He is also an editorial board member for this journal.

Helena van Coller is a professor in the Faculty of Law at Rhodes University, South Africa. She is a member of ICLARS (The International Consortium for Law and Religious Studies), Member of the Board of Directors of ACLARS (The African Consortium for Law and Religious Studies), and the SA Council for the Protection and Promotion of Religious Rights and Freedoms (founding member). Her book on *Regulating Religion: State Governance of Religious Institutions in South Africa* was published by Routledge in 2020 as part of the ICLARS Series on Law and Religion.

In addition to the articles from the conference, we are pleased to reprint in the Documentation section an article by Dennis P. Petri, Kyle J. Wisdom and John T. Bainbridge, all of the IIRF, describing the Violent Incidents Database.

We also have an excellent collection of book reviews and our usual Noteworthy section, highlighting recent reports on freedom of religion or belief.

Yours for religious freedom,
Prof Dr Janet Epp Buckingham
Executive editor

Introducing this special issue

The focus of this special issue is on 'freedom of religion and measures of tolerance.' The goal of accomplishing universal consensus on matters of moral import and public interest in democratic societies around the world has proven to be unattainable. Consequently, insights on tolerance gained in momentum and it is no wonder that the South African Constitutional Court in *Prince v President of the Cape Law Society of the Cape of Good Hope* 2002 2 SA 794 (CC) refers to tolerance as a 'constitutional virtue' (para. 170). This is significant regarding the protection of both religious and non-religious beliefs amidst many challenges pertaining to often contrasting views on especially human dignity, equality and liberty. Acceptance of 'the Other', irrespective of the degree of understanding between the differing parties involved is not only vital to societies that pride themselves on being labelled as democratic and plural, but also for the protection of the right to freedom of religion. Consequently, this special issue should be viewed as promoting toleration by arguing for the protection of religious rights and freedoms against the background of selected topics. This in turn is reflective of various measures by which toleration can be realised.

Consequently, this special issue of the IJRF aims to advance scholarly thought on freedom of religion against the background of measures of tolerance. It consists of four articles.

The first article, by Elizabeth Brink (a UK-qualified solicitor who advocates for victims of religious persecution in sub-Saharan Africa, the Middle East and North Africa) is titled, "How criminalizing hate speech in South Africa could unjustifiably censor religious views." Focusing on the South African context, Brink demonstrates how the broadly formulated Prevention and Combating of Hate Crimes and Hate Speech Act (signed into law on 6 May 2024) fails to align with international legal standards, and how the resulting limitations on expression could impact religiously motivated speech in a manner common to blasphemy laws in other countries. Brink shows how the Act is incompatible with international and regional legal protections regarding freedom of speech and concludes by suggesting better ways to address the issue. The article is a significant contribution to considerations of the inextricable connection between freedom of speech, expression and religion.

Helena van Coller's article is titled, "Church bells, chimes and calls to prayer: A religious blessing or noise nuisance? Balancing the right to religious freedom in South Africa." Van Coller provides an in-depth investigation into the challenge of attaining a balance between, on one hand, religious practices such as bell ringing and Muslim calls to prayer (adhan), which are protected especially by section 15 of the South African Constitution, and, on the other hand, the importance of

maintaining public peace. Included in this discussion is the promotion of tolerance, fairness, accountability and the safeguarding of property rights. Although the article's focus is on South Africa, noise resulting from religious practices poses a challenge across Africa and beyond, thereby giving this article broad relevance.

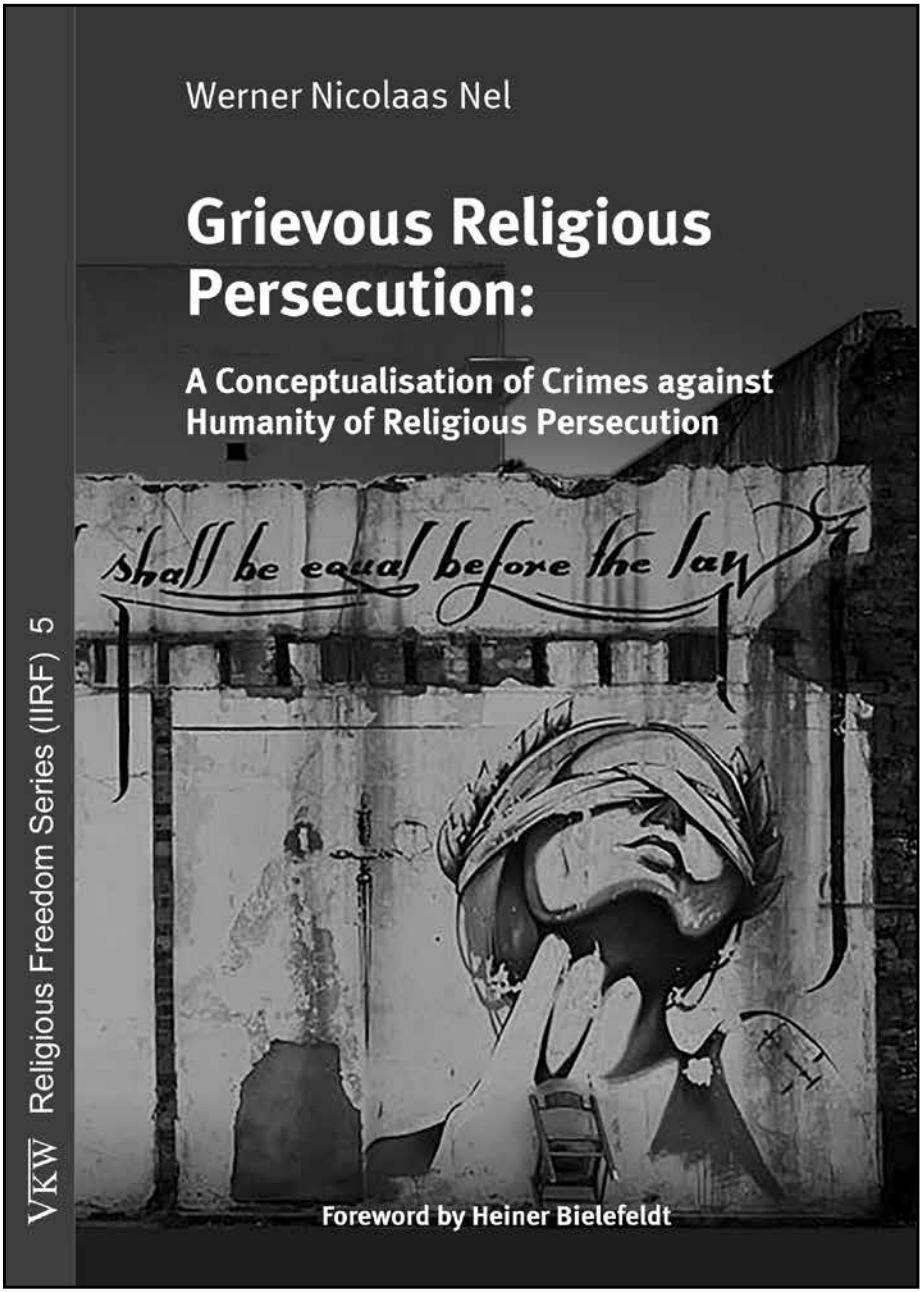
Christo Lombaard, professor of theology at the University of Pretoria, South Africa, writes on "The conceptual placement of atheism in secularist and post-secularist conceptions of society." Lombaard compares the intellectual placement afforded to atheism in social contexts that have a foundationally secularist reflex and in those that are now moving beyond such secularist impulses. Societies with a foundationally secularist reflex have tended to take a default no-religion stance that effectively positions atheism above faith orientations. On the other hand, those moving away from a secularist foundation treat atheism as a religious orientation and consequently position it amongst faith orientations. Lombaard argues that many of these underlying assumptions remain unacknowledged and that this absence of acknowledgement exerts influence through legal, political and social processes, without these effects being critically weighed. The questionability of popular distinctions, such as between religion (belief) and the secular (as implying non-belief) or between religiosity and irreligiosity, also surface in this article.

Our final article is "Towards an index on policies on and attitudes towards propagation of religion or belief: Testing the Religion and State Dataset (Round 3) on BRICS+ countries" by Christof Sauer, Professor Extraordinary of Theology at Stellenbosch University, South Africa and Guest Professor at Evangelische Theologische Faculteit, Leuven. Sauer explores the feasibility of an index on government policies pertaining to the propagation of religion (or belief) as well as accompanying societal attitudes and behaviours. In this regard, he carries out a pilot study examining data on the member states of BRICS+, the intergovernmental organization of major emerging economies. Based on his analysis, he suggests formulas to calculate actionable index scores on religious freedom issues.

This special issue on Religious Freedom and Measures of Tolerance contributes valuable new knowledge that should encourage further research related to the protection of religious rights and freedoms.

In conclusion, we wish to express our appreciation for the professional assistance provided by IJRF executive editor Janet Epp Buckingham and her team in the creation of this special issue.

Prof Shaun de Freitas (University of the Free State)
and Prof Helena van Coller (Rhodes University)
Guest Editors



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How criminalizing hate speech in South Africa could unjustifiably censor religious views

Elizabeth Brink[1]

Abstract

South Africa's Hate Speech Act includes broad definitions of "inciting harm" and "promoting or propagating hatred" and introduces significant ambiguity and subjectivity of statutory interpretation. Worryingly, the law comes in the wake of a trend of so-called hate speech laws across the world, including in national contexts and at the level of the United Nations, which have been intimately linked to the criminalization of speech relating to religious beliefs. The international legal framework for freedom of expression and opinion, and for freedom of religion or belief, provides a suitable basis by which to amend the law.

Keywords

South Africa, hate speech, blasphemy, religious expression.

1. Introduction

On 6 May 2024, South African President Cyril Ramaphosa signed the Prevention and Combating of Hate Crimes and Hate Speech Act into law. The preamble states that the law aims to give effect to the country's constitutional and international obligations concerning racism, racial discrimination, xenophobia, and related intolerance and to criminalize hate crimes and hate speech. The rationale is to strengthen the country's laws governing racism in post-apartheid society, in addition to providing a more robust legal framework to tackle hateful speech and expressions.

The legislation was introduced in the wake of a spate of so-called hate speech laws across the world, which have been used in numerous countries to severely restrict a person's fundamental right not only to freedom of expression and opinion but also to freedom of religion or belief (FORB).

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1 Elizabeth Brink is a UK-qualified solicitor who specializes in advocating for victims of religious persecution in sub-Saharan Africa and the Middle East and North Africa regions. This article uses British English. Article submitted: 15 March 2025; accepted 23 October 2025. Email: efrancis@adfinternational.org.

This article does not focus on the historical underpinnings of the racial discrimination or speech laws that preceded the Hate Speech Act, or on the law's domestic compatibility with constitutional or case law.[2] Instead, it explores why the broad foundations of the legislation fail to align adequately with international legal standards and how the restrictions on expression could impact religiously motivated speech, mirroring some elements common to blasphemy laws in other countries, such as in Africa and Europe. To do this, section 2 considers the meaning of hate speech under the Act and makes comparisons to the threats to religious speech and expression contained in similarly construed global blasphemy laws. Section 3 outlines how the South African law is incompatible with the international and regional legal protections for freedom of speech. Section 4 discusses how the South African legislation might be amended to better safeguard freedom of speech.

Hate speech legislation not only threatens the speech rights and freedoms of religious minorities, but such laws are increasingly being used against members of religious majorities as well. The law must be restricted in scope to ensure that speech is criminalized only in the most extreme situations. Peaceful expressions of opinion that merely offend should not be considered worthy of criminal prosecution.

2. The Hate Speech Act

This section explains why the Hate Speech Act is overly expansive and vague and could restrict otherwise lawful speech. Considering that approximately 80 percent of people in South Africa identify as Christian and 5 percent follow other faiths (Statistics South Africa 2022), it is striking that religious or moral opinions could be unjustifiably restricted, censored, or criminalized under the law. The Department of Justice and Constitutional Development has announced that it intends to work towards ensuring greater international compliance with treaties and obligations (South African Government 2025); accordingly, legislators in South Africa should take note that similar laws from around the world often fall short of complying with the strict requirements of international human rights law.[3] The section then compares these laws with blasphemy laws.

2 See e.g. Winks (2023); Geldenhuys and Kelly-Louw (2020).

3 Section 233 of the South African Constitution provides, "When interpreting any legislation, every court must prefer any reasonable interpretation of the legislation that is consistent with international law over any alternative interpretation that is inconsistent with international law." Also notably, the Supreme Court of Appeals has turned to international jurisprudence when considering hate speech laws prior to the enactment of the Hate Speech Act. In *Qwelane v South Africa Human Rights Commission and Another* 2021:para. 78, the jurisprudence of the European Court of Human Rights, in *Vejdeland v Sweden*, no 1813/07, ECHR, 2012 and *Handyside v the United Kingdom*, no. 5493/72, ECHR, 1976, were referred to when the court reasoned, "Hate speech is the antithesis of the values envisioned by the right to free speech – whereas the latter advances democracy, hate speech is destructive of democracy."

2.1. The Hate Speech Act is overly broad and vague

Under the legislation, the offence of hate speech is defined as expressions, communications, or private communications that "could reasonably be construed to demonstrate a clear intention to be harmful or to incite harm, and promote or propagate hatred against a person based upon any defined grounds." The speech can be via electronic communications to any member of the public or a specific person, and the Act requires intention or a reasonable construal of intention to commit the crime [section 4(1)]. The grounds include race, religion, sexual orientation, gender identity or expression, or sex characteristics. Criminal punishments range from a fine to a five-year term of imprisonment, or both [section 6(3)].

The wording of this offence is concerning in several ways. First, it lacks objective and clear definitions of key terms. Hate is not explicitly defined, and harm is defined broadly, spanning "substantial emotional, psychological, physical, social or economic detriment that objectively and severely undermines the human dignity of the targeted individual or groups." These concepts are ambiguous, highly subjective, and heavily reliant on the lived experience of the victim. The "victim" is also not a singular definable person as it can be any "member of the public" [section 4(1)(b)], and their impact statement does not need to be written by them but can be written by a family member or group of persons who have supported them if they are deceased, or by an organization or institution with expert knowledge of the group to which they belong or are perceived to belong [sections 5(1), 5(2)(b)].

Second, there is no requirement that an accused person has a proven, specific intention to commit hate speech; it is sufficient that another person could "reasonably construe" a "clear intention to" commit a crime. The details of who should be given the task of reasonably construing this intention are not mentioned [section 4(1)(a)]. Instead, the legislation simply refers to the Director of Public Prosecutions, or any delegated person, authorizing any such prosecutions when a complaint has been made.[4] This paves the way for vexatious or frivolous claims and, ultimately, incorrect convictions based on an inconsistency in law enforcement.

Third, the grounds under which hate speech is defined as directed against persons are vague and potentially unknowable by the accused in advance of making the speech. These include "sexual orientation, gender identity or expression or sex characteristics," categories that are themselves fluid. These grounds stray into religious morals and potentially encompass speech about sexual ethics. This

4 Under section 10 of the Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 ("prohibition on hate speech"), the civil court may refer the matter of hate speech to the Director of Public Prosecutions, who has "jurisdiction for the institution of criminal proceedings in terms of the common law or relevant legislation" (*Qwelane v South Africa Human Rights Commission and Another* 2021).

provision could catch members of the public making general statements about one of the grounds on the internet or in a magazine interview, for example.

Fourth, the legislation does not necessarily require a direct causal link between hate speech and a specific, identifiable recipient. The victim could theoretically be any member of the public who can access the speech or expression, or any family member of a person who aligns with a specific or perceived ground that the legislation lists [section 4(1)]. The scope of a potential victim is therefore very broad and could include people who have never met the accused. Similar legislation from Scotland has been used to categorize human rights activists who advocate for minority sexual or gender groups on social media as victims (Brooks 2024).

Fifth, while there is a religious freedom exemption in the text which says that the hate speech offence does not apply to anything "done in good faith in the course of engagement in any bona fide interpretation and proselytizing or espousing of any religious tenet, belief, teaching, doctrine or writings" [section 4(2)(d)], this is conditional upon the religious speech not constituting incitement to cause harm, including emotional or psychological harm. The clause is therefore narrowly defined and worded in a circular way, and it does not appear to consider the possibility of good-faith religious expression relating to some of the categories criminalized by the Act, such as sex, sexuality, or gender (for example, traditional Christian views on marriage). By comparison, a street preacher was found guilty by the English courts under the Public Order Act in 2015 for publicly citing the Bible while referring to homosexuality (Bingham 2015).

While it is premature to appreciate how the law will be interpreted by law enforcers, such vague and broad wording could significantly restrict and criminalize otherwise peaceful and legitimate expressions relating to deeply held beliefs. The subjectivity required to interpret the legislation could lead to vexatious claims of "hate speech" and "harm," which, considering how other similarly worded laws are interpreted (such as in Europe), could be used to censor and penalize expressions that cause mere offence.

2.2. Hate speech laws globally

At least 118 countries criminalize hate speech, including countries in Africa, Europe and Asia.[5] Hate speech laws have also been introduced in international institutions,[6] and many social media companies have adopted their own guidelines.[7] As a general trend, hate speech laws usually criminalize "offensive discourse tar-

5 Ninety countries criminalize hate speech under the criminal code; and the others either under the constitution or by separate legislation. See the analysis by The Future of Free Speech (2024).

6 Such institutions include the European Union, Council of Europe, and the United Nations in the UN Strategy and Plan of Action on Hate Speech.

7 Meta, X and Youtube all have hate speech policies (as of March 2025)

geting a group or an individual based on inherent characteristics and that may threaten social peace."[8] Many countries have argued that these laws protect vulnerable people who have a specific minority characteristic, with the most common categories of hate speech being listed as based on race, religion, gender, or sexual orientation (USCIRF 2019).

However, the absence of an explicit definition of hate speech in international law has left South African legislators without any clear boundaries by which to frame the offence. Outside of the traditional categories of restrictions on speech, such as incitement to violence or defamation, legislators globally have not been able to clearly agree upon what constitutes hate speech. Consequently, a common characteristic of the laws around the world is that they usually impose criminal penalties on broad categories of expression without a clear definition of hate or boundaries on how the crime is to be committed. Referring to an attempted definition by the United Nations, one commentator assessed that hate speech could "encompass nearly everything every person says, does, or writes, no matter the venue or whether public or private" (Fischer 2021).

Globally, there are numerous examples of hate speech laws being used to suppress otherwise legitimate and peaceful speech. Some cases have involved religiously-motivated speech or expressions about sexuality or gender, particularly when another person finds the speech offensive. For example, in Finland, hate speech laws have been used to bring a Christian politician before the Supreme Court for posting an image of a Bible passage about marriage on social media (ADF International 2025). In Italy, hate speech legislation has resulted in censorship in the arts, including towards religious expression (Atalex 2013). In Scotland, after a law was passed to criminalize derogatory comments or stirring up hatred based on age, disability, religion, sexual orientation, transgender identity or being intersex, the police received almost 4,000 complaints by victims in the space of two days. A Scottish government minister admitted to national newspapers that the legislation was leading to people making "false and vexatious" claims (Boner 2024).

There is also international precedent for the use of hate speech laws to limit traditional religious values or silence religious critique. In Ethiopia, a law introduced to combat divisive rhetoric and disinformation has suppressed religious content, such as on YouTube and Facebook (Asegidew et al. 2022). In Brazil, Christian leaders have been investigated under hate speech laws for expressing religious views from the pulpit about homosexual relationships (New Waves Ministry 2021).

8 United Nations, What is hate speech?

2.3. Blasphemy laws

Blasphemy laws exist in over 70 countries (USCIRF 2019), with prominent examples in Iran, Nigeria and Pakistan (USCIRF 2024). They punish the expression or acts of individuals deemed to be insulting to religious feelings or showing a lack of reverence for a god or deities, or offending or denigrating religious doctrines or symbols (USCIRF 2017). The laws are vaguely worded, and punishments range from fines to death sentences. Blasphemy remains a common-law offence in South Africa, defined as unlawfully, intentionally and publicly acting contemptuously towards God.[9]

Across Africa, blasphemy laws are written in secular national legislation as well as in regional Sharia laws. In Nigeria, the Criminal Code provides a two-year punishment for the misdemeanour of religious insult,[10] and the addition of Sharia criminal law in some northern Nigerian states includes punishment by death (ADF International 2024).[11] In Egypt, ridiculing, insulting, or damaging the national unity of the "heavenly" religions is prohibited.[12] There have been an estimated 130 cases of blasphemy during the last 10 years in Egypt, 90 percent of which have been against Christians accused of insulting Islam (Minority Rights Group 2024). In Sudan, although flogging for blasphemy was abolished in 2020 (Global Legal Monitor 2024),[13] one can still face a 10-year prison sentence for saying religiously insulting things (USCIRF 2021). In Uganda, "wounding the [religious] feelings" of others is criminalized,[14] and two Christians were arrested under this law in December 2023 for street preaching (Morning Star News 2023). In Ethiopia, any public disapproval of religious "ceremony or office" is criminalized. "Blasphemous or scandalous utterances or attitudes" expressed in public are also subject to the criminal law.[15]

2.4. The similarities between hate speech laws and blasphemy laws

In 2017, the former UN Special Rapporteur on Freedom of Religion or Belief noted that as blasphemy laws have fallen out of favour in certain parts of the world,

9 The last conviction for blasphemy in South Africa was in 1968 (End Blasphemy Laws 2020).

10 Article 204 of the Criminal Code: "Any person who does an act which any class of persons consider as a public insult on their religion, with the intention that they should consider the act such an insult, and any person who does an unlawful act with the knowledge that any class of persons will consider it such an insult, is guilty of a misdemeanour and is liable to imprisonment for two years."

11 State law has been used to convict individuals such as Yahaya Sharif-Aminu, who was arrested based on a WhatsApp message. See Kano State Sharia Penal Code Law of 2000, Section 382(b): "Whoever by any means publicly insults by using word or expression in written or verbal by means of gesture which shows or demonstrate any form of contempt or abuse against the Holy Quran or any Prophet shall on conviction be liable to death." Also, see Sections 114 and Section 382(b), as well as UN Human Rights Council (2024).

12 Section 98(f) of the Law No. 58 01, 1937, Promulgating the Penal Code (Nigeria), punishable with up to a five-year prison sentence.

13 See Miscellaneous Amendments Law of 2020 (Repeal or amend the provisions restricting freedoms) No. 12 of 2020. Flogging is still a valid penalty for "crimes of drinking alcohol, adultery committed by an unmarried person, and falsely accusing another person of committing adultery." Criminal Act 1991, Articles 78(a), 146(b), 157 (c).

14 Sections 118 and 122, Ugandan Penal Code, 1950.

15 Articles 492 and 816 of the Criminal Code of the Federal Democratic Republic of Ethiopia, 2005.

many countries have introduced hate speech laws as replacements, thus emphasizing the similarities in that both types of laws restrict freedom of expression and speech (Special Rapporteur 2017). Both types of laws can criminalize people for saying something perceived as critical or undermining towards religion, religious belief, personal belief or cultural values, even where there is no intention to insult, no identifiable victim, and no resulting tangible harm.

As for the similarities, both hate speech and blasphemy laws are constructed upon vague and overly broad texts, causing them to be interpreted to restrict and prevent religious expression and to suppress minority dissenting views, or even majority religious views, for "politically incorrect" speech. Clauses with words such as "insult to feelings" or "harm" are highly subjective and can encompass minority opinions that are merely disagreeable. Such vague texts risk violating the basic principles of the rule of law, which require objectivity, predictability and intelligibility.[16] This means that vaguely drafted laws are more prone to result in potential or actual discrimination in implementation (USCIRF 2019), with the blasphemy laws against Christians in Muslim-majority countries being the most prominent example.

Second, since they contain vague and ambiguous terms, hate speech laws rely on subjective interpretation that could facilitate arbitrary or malicious enforcement against political and religious minorities, akin to how blasphemy laws can be interpreted.[17] UN Special Rapporteurs have advised that, in addressing the dilemma, tighter or stricter definitions in combination with independent judiciaries should be advocated for (Special Rapporteur 2017). There are often no impartial arbiters to determine what constitutes hate, and in many cases, the arbiter is politically or religiously motivated against minorities (Fischer 2021).[18]

Third, statutory punishments are significant and arguably disproportionate in both types of laws. A handful of countries around the world retain the death penalty for blasphemy against Islam, and other countries maintain harsh prison sentences. While not including the prospect of capital punishment, hate speech laws nevertheless can punish individuals with imprisonment, even if no causal connection has been established between the speaker's intent and the feelings

16 Lecture delivered at the Centre for Public Law entitled "The Rule of Law", Cambridge University, United Kingdom, by the Rt. Hon Lord Bingham of Cornhill KG, House of Lords (16 November 2006).

17 These kinds of laws aim to combat speech that is offensive to religious groups or non-religious groups and are "tantamount to blasphemy laws" because they result in the same restrictions on the rights to free speech and to freedom of religion and belief. USCIRF has argued that laws restricting the media are "often used to prohibit hate speech on the basis of race, ethnicity, religion, and other factors, with the written intent to protect those individual identities; however, these laws are also often open to misuse for political purposes."

18 Ironically, an analysis of hate speech cases from around the world reveals that as with blasphemy laws, the support for the use of the law to shield minorities from harm could, in fact, cause minorities more harm as they are subjected to more arbitrarily applied, abusive legislation.

or experience of the recipient.[19] Notably, such harsh punishments have a chilling effect by deterring other individuals from freely expressing themselves for fear of reprisal from others in society or from the law itself.[20]

Fourth, both types of laws fail to mirror the narrow limitations on freedom of expression and speech that are outlined in international law. Freedom of expression is highly valued in international human rights discourse, and international experts have called for the abolition of blasphemy laws and the narrowing of hate speech laws. Although international law permits restricting speech in some situations, the criminalization of allegedly harmful speech because of the offence or insult that a victim feels seems unwarranted.

3. The compatibility of South Africa's Hate Speech Act with international human rights law

I now turn to the compatibility of the South African law with international standards of freedom of speech and religious expression. According to international human rights law, fundamental rights and freedoms should be restricted only in very narrow, proportionate, and limited circumstances. Vaguely worded hate speech and blasphemy laws fail to reach the threshold required for States to limit expression. Although the drafters of the Hate Speech Act considered various constitutional provisions and the International Convention on the Elimination of All Forms of Racial Discrimination, the text does not outline how the legislation aligns with international legal provisions on freedom of speech and religion or section 15 of the South African Constitution, which protects freedom of conscience, religion, thought, belief and opinion.[21]

3.1. Freedom of expression and opinion

International law provides a robust basis for the protection and upholding of freedom of expression and opinion. Article 19 of the International Covenant on Civil and Political Rights (ICCPR), which South Africa ratified in 1998, provides, "Everyone shall have the right to hold opinions without interference," and "Everyone shall have the

19 For example, the secular "religious insult" law in Nigeria carries a sentence of up to two years' imprisonment. See the Criminal Code of Nigeria, section 204.

20 The punishment can also be considered excessive in view of the guidance from the Rabat Plan of Action, where it is recommended, "Criminal sanctions related to unlawful forms of expression should be seen as last resort measures to be applied only in strictly justifiable situations. Civil sanctions and remedies should also be considered, including pecuniary and non-pecuniary damages, along with the right of correction and the right of reply" (OHCHR 2013:para 34).

21 The Preamble to the Hate Crimes Act outlines various provisions from the Constitution of the Republic of South Africa, 1996 – sections 7(2), 8(2), 9, 9(1), 9(3), 9(4), 10, and 16. It also refers to the Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 (Act No. 4 of 2000), the Declaration adopted at the United Nations World Conference against Racism, Racial Discrimination, Xenophobia and Related Intolerance held in Durban, and the International Convention on the Elimination of All Forms of Racial Discrimination.

right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice."

According to the UN Human Rights Committee, freedom of opinion and expression are "indispensable…for the full development of the person," "essential for any society, and "foundation stone[s] for every free and democratic society."[22] A former UN Special Rapporteur has also affirmed that Article 19 of the ICCPR extends protections to people who express "a minority or even offensive interpretation of a religious tenet or historical event" (Kaye 2019).

Limitations on speech and expressions must be carefully applied. Article 19(3) of the ICCPR allows for certain restrictions only when legal, proportional, and necessary, such as for the protection of the "rights or reputations of others" and the protection of "national security, public order and public health or morals." If a state wishes to restrict this right under Article 19(3), the burden falls on it to justify the restriction, not on the speaker to demonstrate that they had the right to the speech in the first place (UN Human Rights Committee 2011). Article 20 of the ICCPR also provides permissible limitations that States may impose on freedom of speech, but only in very defined circumstances. These are when restrictions are legitimate to prohibit propaganda to war and "any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence." There is no obligation, though, on States to prohibit any advocacy of religious hatred. Moreover, Article 20(2) does not require that "incitement" should necessarily result in the criminalization of the act or speech. Former UN Special Rapporteurs have advised that criminalization should only be considered where the advocacy constitutes "serious and extreme instances of incitement,"[23] and that "expressions should only be prohibited under Article 20 if they constitute incitement to imminent acts of violence or discrimination against a specific individual or group" (Jahangir 2006).[24]

By not considering the balance these texts require, the South African Hate Speech Act could unjustifiably restrict certain good-faith legitimate expressions

22 Since freedom of expression is fundamental to the enjoyment of other human rights, restrictions on it must be exceptional, subject to narrow conditions and strict oversight. The UN Human Rights Committee (2011:para 21) has emphasized that restrictions "may not put in jeopardy the right itself."

23 Moreover, the United Nations Special Rapporteur on Freedom of Expression stated that people should "not be silenced under Article 20 [of the ICCPR] (or any other provision of human rights law). Such expression is to be protected by the State, even if the State disagrees with or is offended by the expression" (UN Human Rights Committee 2011).

24 Despite these narrow exceptions, international law nonetheless permits that certain speech made against the racial profile of an individual could potentially fall within the scope of permissible restrictions. Article 4(a) of the International Convention on the Elimination of All Forms of Racial Discrimination permits States to punish "all dissemination of ideas based on racial superiority or hatred, incitement to racial discrimination, as well as all acts of violence or incitement to such acts against any race or group of persons of another colour or ethnic origin, and also the provision of any assistance to racist activities, including the financing thereof."

that do not incite any imminent violence but merely offend a certain subset of the population, particularly those related to religious expression. In this manner, the right to freedom of religion or belief is closely linked to the right to free speech.

3.2. Freedom of religion or belief

Article 18 of the ICCPR affirms the right to freedom of thought, conscience, and religion. The UN Human Rights Committee (1993) has advised that this right is far-reaching and profound; it encompasses freedom of thought on all matters, personal convictions, and the commitment to religion or belief, whether manifested individually or in the community. It also includes "a broad range of acts" including "produc[ing] … religious literature" and "possessing … religious books and other materials …[which amounts to] a manifestation of one's religion under Article 18(1)" (*Adyrkhayev v. Tajikistan* 2022).

Under Article 18(3) of the ICCPR, the manifestation of religion or belief, which could include religiously motivated speech, may only be subject "to such limitations as are prescribed by law and are necessary to protect public safety, order, health or morals or the fundamental rights and freedoms of others." While this statement is fairly broad, the UN Human Rights Committee considers these components to be specific and strict, with restrictions being allowed only when proportionate to the severity of the threat of harm. The Committee has stressed that restrictions should not unjustifiably censor minority religious viewpoints, including religious morals such as beliefs about gender or sex. In *Malakhovsky and Pikul v. Belarus*, it emphasized the protection of religious expression, including religious teachings, unless such expression incites violence or is discriminatory, or conflicts with public safety, order or health. Moreover, in *Sister Immaculate Joseph v. Sri Lanka,* it affirmed the protection of a nun's religious expression on issues of morality. Moreover, the Committee has noted that it is impermissible for prohibitions in domestic laws to be used to "prevent or punish criticism of religious leaders or commentary on religious doctrine and tenets of faith" (2011). This includes criticism of a country's majority religion.

It is possible that law enforcers could interpret the South African Hate Speech Act to punish the manifestation of religious belief relating to one of the law's stated grounds. The Act does not explicitly stipulate permissible limitations on religious expressions, thereby implying that expressions that do not meet the international threshold of infringing upon the broad concepts of public safety, order, health or morals, or the rights of others, could nevertheless lead to a criminal prosecution. The circular wording of, and the lack of robust guidelines around, the religious exemption clause [section 4(2)(d)] – combined with the inclusion of grounds that include sexual orientation and gender – indicate this possibility. This could result in the Act being used to discriminate against particular types of people.

3.3. Regional human rights protection

To complement the international bill of rights, the African Charter on Human and People's Rights (African Charter) protects freedom of religion or belief only in Africa (article 8). The African Court of Humans and Peoples Rights has interpreted this provision broadly, ruling that it requires signatories to fully guarantee the components of freedom of conscience, the profession and free practice of religion (*African Commission on Human and Peoples' Rights v. Republic of Kenya* 2017:para. 48). Article 9 of the African Charter, dedicated to freedom of expression and opinion, has been interpreted strictly so as to indicate that States may not limit fundamental freedoms.[25] This regional jurisprudence provides additional impetus for South Africa to amend the Hate Speech Act to align with human rights standards, or else to face a potential referral to these regional institutions.

Where States have restricted speech, the African Court and its Commission have used a proportionality test and ruled that the restriction must be "absolutely necessary for the advantages which follow" and must not render the right itself "illusory" (*Media Rights Agenda v. Nigeria* 1998). Furthermore, they have emphasized that "the [African] Charter contains no derogation clause" (*Constitutional Rights Project v. Nigeria* 1999).

The African Court has also condemned speech-restricting criminal sanctions, stating that if they are "disproportionate or excessive, they are incompatible with the Charter and other relevant human rights instruments." Using a proportionality test, it advised that several questions should be asked, such as the following: "Are there sufficient reasons to justify the action? Is there a less restrictive solution? Does the action destroy the essence of the right guaranteed by the Charter?" (*Lohé Issa Konaté v. Burkina Faso* 2014:para. 125). It is unclear whether the Hate Speech Act drafters considered a proportionality test, as all drafts of the bill contained long prison sentences for the offence of hate speech. It is arguable that the criminalization of hate speech is not necessary, not least because it is already governed in South Africa by civil law.[26]

The Declaration of Principles of Freedom of Expression and Access to Information in Africa also provides principles relating to fundamental freedoms for African legislative systems. These principles, albeit not law, affirm that the criminalization of speech can only be a last resort and applied to the "most severe cases," and that speech that merely lacks civility or offends or disturbs should not

25 As for politically suppressed speech, the African Commission noted, "Freedom of expression is a basic human right, vital to an individual's personal development and political consciousness, and to his participation in the conduct of public affairs in his country." Communications 140/94, 141/94, 145/94 against Nigeria (1994).

26 See section 10 of the Promotion of Equality and Prevention of Unfair Discrimination Act 2000.

be limited.[27] As the Hate Speech Act arguably encompasses speech that merely offends within its scope – which is evident through the inclusion of emotional harm and a broad meaning of "victim" within its definitions – it arguably does not align with this precedent. Religious beliefs relating to morals or lifestyles of the readers of public or private social media posts, for example, could be disturbed or offended by speech that is forbidden under the Act.

4. How can South Africa better protect freedom of religious expression?

The Hate Speech Act has the potential to limit legitimate speech – including speech relating to religious beliefs and morals – even though this is not its stated aim. In this section, I will consider how legislators can better frame hate speech laws to prevent such overreach. If the law is used to prosecute individuals who express peaceful religious opinions or sentiments that are considered hateful or harmful towards a particular minority community, the law could mirror the broad and vague reach of blasphemy laws, which have been consistently condemned by international legal experts. For the law to better align with international standards and not be used as a tool to limit or censor minority religious expressions, certain terms in the text must align with international and regional human rights law.

First, the Police Service and prosecutors must have clarity on key terms underpinning the hate speech offence, including the word "hatred," and how they could prevent investigations into vexatious claims. The sphere of communications should be explicitly limited to the public, and the grounds within the definitions section should be clarified – especially the nebulous phrase "gender identity or expression." The concept of a victim needs to be clearly defined, and the notion of harm should be afforded an objective standard of meaning so that the ambiguous concepts of "emotional or psychological harm" and "social" harm are properly understood and that prosecutors only explore claims when there is a clear causal link between the speech and the harm. Furthermore, the concept of "economic detriment" should be removed and this matter should remain governed by civil law. The guidance and

27 Principle 22 of the Declaration of Principles of Freedom of Expression and Access to Information in Africa concerns the issue of "Restrictions on Freedom of Expression." It permits countries to prohibit such speech that calls for hatred and constitutes incitement to discrimination, hostility, and violence, but it affirms that criminalization of speech can only be a last resort and for the "most severe cases." Principle 23(3) warns, "States shall not prohibit speech that merely lacks civility or which offends or disturbs." This aligns with the European Court of Human Rights jurisprudence that freedom of expression may be limited for reasons such as public morality, provided the restrictions are "necessary in a democratic society." Nonetheless, it also opined, "Freedom of expression … is applicable not only to 'information' or 'ideas' that are favorably received or regarded as inoffensive or as a matter of indifference but also to those that offend, shock or disturb the State or any sector of the population" (*Handyside v. the United Kingdom* 1976:para. 49). Principle 22, moreover, reflects the general international landscape rule that sanctions against speech must meet the standards of being necessary, proportionate, and legally prescribed.

direction on the specifics of these terms should be more robust than what the "social context training" about hate speech under the Act describes [section 7(1)(b)].

As a second priority, prosecutorial guidelines, issued by the National Director of Public Prosecutions, should be developed, in addition to section 7 on "National Instructions and Directives," to aid a consistent and clear interpretation of the international guidelines on when and how to limit speech. Only the most egregious expressions that actually and causally incite imminent violence should be included. Law enforcers should be warned about the potential for spurious or vexatious claims. Prosecutorial guidelines should affirm that freedom of speech, under the Constitution, must be afforded the highest possible protection; that any complaint related to speech needs to pass through robust, objective considerations under the law; and that only the most egregious types of public[28] speech – which does not include private or religious speech – can be included.

As a basis for the guidance, the framework document issued by the UN Office of the High Commissioner for Human Rights should be consulted. The Rabat Plan of Action on the Prohibition of Advocacy of National, Racial or Religious Hatred that Constitutes Incitement to Discrimination, Hostility or Violence (OHCHR 2013) acknowledged that some national, racial, or religious hatred could lead to incitement to violence, hostility, or discrimination, as per Article 20 of the ICCPR. Yet prosecutions against speech need to be controlled so as not to lose sight of wider human rights principles, including freedom of expression.

Although the Rabat Plan's drafters did not address the fundamental questions of what hate speech is or how to balance various competing interests, the document nevertheless provided six factors that a judge or prosecutor should consider in any case involving an alleged speech-related offence, to assess whether it meets the criteria for incitement. These are the social and political context of the speech; the speaker's status in relation to the audience, the speaker's specific intent; the provocative and direct content and form of the speech; the extent or reach of the expression; and the likelihood of incitement to violence, which includes its imminence. This means that "some degree of risk of harm must be identified," including through the determination of a "reasonable probability that the speech would succeed in inciting actual action against the target group" (OHCHR 2013:para. 29). Importantly, the Rabat Plan urged that laws limiting hate speech should be defined narrowly, proportionate, and based on strict necessity, so as to prevent them from unnecessarily and unjustifiably suppressing free speech.[29]

28 In *Qwelane*, the judge addressed the problem with private communications falling within the definition of hate speech (*Qwelane v South Africa Human Rights Commission and Another* 2021:paras. 118-119).

29 A former UN expert summarized the baseline for limiting speech to be "incitement," which refers to statements about national, racial or religious groups that create an imminent risk of discrimination, hostility or violence against persons belonging to those groups. See United Nations General Assembly

The religious exemption clause [section 4(2)(d)] should also be clarified in guidelines so that it will not lead to unjustified prosecutions against "interpretation and proselytising or espousing of any religious conviction, tenet, belief, teaching, doctrine or writings" when the grounds of gender or gender identity, religion, sex (which includes intersex), and sexual orientation are referenced. Under the current, circular wording of the provision, there is no guarantee that merely offensive words about these grounds will be protected against an accusation of "advocating hatred that constitutes incitement to cause harm." It should also be made clear that this exemption extends to members of the public, as well as religious ministers.

Guidelines are essential to prevent the application of the law from going beyond constitutional provisions or the Rabat Plan, and they would greatly assist the Police Service in swiftly dismissing complaints of offence based on legitimate expressions made in good faith which do not lead to the threat of imminent hostility or violence. It should be clarified that criminal law ordinarily should not respond to allegations of hate speech and that the police will only, in very specific and limited situations that are justified, respond to such allegations.

As a final note, South African civil law has established a precedent of limiting religiously-motivated speech in a case where the Equality Court imposed a fine upon a preacher whose comments on sexuality were deemed to fall outside his constitutional rights.[30] If this reasoning were used to prosecute individuals under the Hate Speech Act, the punishments could be significantly more severe. This case also shows that the civil law already responds adequately to certain expressions considered troublesome.

5. Summary

Freedom of speech, expression, and religion or belief are accorded a very high status in international law and are proclaimed by scholars, academics, and legal theorists as the cornerstone of any democratic society. Two former UN Special Rapporteurs, Frank La Rue (2008-2014) and David Kaye (2014-2020), have underscored this point (La Rue 2012; Kaye 2019). Moreover, regional jurisprudence in Africa has clearly affirmed the importance of these rights within the continent, indicating that they deserve robust protection. To comply with international and regional ob-

(2012), *Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression*, UN Doc. A/67/357, at para. 46.

30 In 2014, Oscar Bougardt was held by an Equality Court Order to be in violation of Section 10(1) of the Promotion of Equality and Prevention of Unfair Discrimination Act (PEPUDA) for his comments, which were judged to constitute "the publication, propagation, or communication of words based on one or more of the prohibited grounds against any person, that could reasonably be construed to demonstrate a clear intention to be hurtful, be harmful or to incite harm, or promote or propagate hatred." Rev. Bougart was further prosecuted for contempt of court in 2018 and 2023 for continuing to make similar comments (South African Human Rights Commission 2023).

ligations, criminal laws that intend to limit this right must be narrowly construed so as not to unjustifiably infringe upon a citizen's fundamental human rights. It is also critical that laws are written and enforced in a way that does not unintentionally create a culture of self-censorship, whereby citizens fear prosecution because of causing an unintended "offence" to other people despite the lack of any tangible harm. There has been a notable, troubling trend of States using hate speech laws to suppress peaceful expressions that are religiously motivated.

As one former UN Special Rapporteur on Freedom of Religion or Belief noted when he observed an overlap between hate speech and blasphemy laws:

> Laws formulated in this way are often applied to reinforce the dominant political, social and moral narrative and opinions of a given society. … In some cases, "hate speech" laws are even used to restrict minorities from promoting their culture and identity, or from expressing concern about discrimination against them by the majority. (Human Rights Committee 2019:para. 33)

This UN expert's predecessor similarly spoke out strongly against hate speech laws and the "misguided" efforts of governments that try to use them to combat vaguely defined hate speech while threatening strong penalties that end up suppressing legitimate speech. He noted that, for Article 20(2) of the ICCPR to be correctly interpreted, only "advocacy [of hatred] which constitutes incitement … [leading to] discrimination, hostility or violence" can be included and, "as such, advocacy of hatred on the basis of national, racial or religious grounds is not an offence in itself." He advised that hate speech should, for the most part, not be criminalized but should be dealt with by civil law (La Rue 2012:paras. 33, 34).

If South Africa is to retain the hate speech offence under its criminal law, this provision must be objectively and consistently applied, while appropriately taking into account the importance of freedom of religion or belief. It should be clarified that only speech that passes the threshold of Article 20(2) of the ICCPR will be included within the criminal framework, and all ambiguous and broad words in the Act should be redefined. In the absence of these adjustments, legislators should acknowledge that civil law can already adequately deal with the issues the Act seeks to resolve.

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Camila Andrea Sánchez Sandoval

Religious Freedom in Mexico and Colombia

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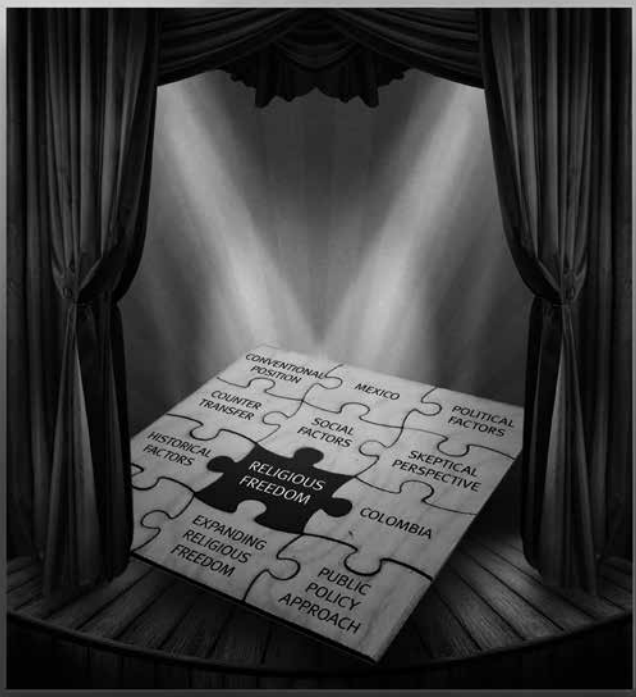

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Church bells, chimes and calls to prayer: A religious blessing or noise nuisance?

Balancing the right to religious freedom in South Africa

Helena van Coller[1]

Abstract

Property owners have the right to enjoy their property free from noise nuisances but are equally obligated to use their property responsibly, respecting the rights of neighbours. In South Africa, noise nuisances, which include amplified sounds and church bells, are governed by national, provincial, and local regulations. While religious practices such as bell-ringing and calls to prayer (adhan) are protected under section 15 of the South African Constitution, these activities must be balanced with the need to maintain public peace. Case law highlights this balance, also emphasising respect for community rights. Effective regulation should promote tolerance, fairness, and accountability, safeguarding property rights and religious freedoms.

Keywords

South Africa, religious freedom, church bells, calls to prayer, adhan, noise nuisance, regulation, property rights, reasonableness.

1. Introduction

As a general legal principle, property owners have the right to enjoy their property free from noise nuisances. However, this right is accompanied by a duty to exercise ownership within reasonable and acceptable limits, ensuring that the enjoyment of their property does not infringe upon the rights of others. When property owners exceed these reasonable boundaries, their actions may create a nuisance, which is actionable under the principles of neighbour law.

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Nuisance laws, as part of neighbour law, establish rules and guidelines for the use of a property so as to balance the rights and interests of neighbouring owners. They aim to mediate conflicts where competing interests arise. Any sound that disrupts or has the potential to disturb the peace and comfort of a reasonable person – such as church bells, calls to prayer, musical instruments, or sound amplifiers – may qualify as a noise nuisance. These nuisances may be regulated through national, provincial, or local noise control laws and bylaws.

Religious practices such as liturgical bell ringing or calls to prayer present a clear conflict between rights. On the one hand, residents have the right to enjoy their property free from intrusive noise. On the other hand, religious institutions and their members have the right to express their faith publicly as part of the collective right to freedom of religion. In such cases, regulation serves as a means to balance these conflicting rights, ensuring that neither interest disproportionately infringes on the other. As Krishnaswami (1960:33) stated:

> Regulation by public authorities of the use of symbols, bells, musical accompaniments and amplifiers associated with a religion or belief may be necessary in order to preserve peace and tranquillity, particularly in localities where people of different faiths reside.

It has been argued that when public authorities "prohibit or limit the wearing of certain apparel, the use of bells or musical accompaniments, or the display of symbols associated with a religion or belief, such a prohibition may, in fact, prevent the observance or exercise of an essential and often obligatory part of a religious practice, or at least an established custom" (Krishnaswami 1960:33). Religious symbols and instruments are central to cultural and religious practices and should be regulated by the government in a way that respects the right to freedom of religion.

This paper outlines the principles of neighbour law, focusing on nuisance law as it relates to religious practices such as bell ringing and calls to prayer within the context of religious freedom in South Africa. It also reviews the legislative framework for controlling noise nuisances. Through various examples, I highlight principles for the reasonable use of land, noting that excessive noise, such as bell ringing, should not unreasonably impact the use and enjoyment of neighbouring properties. While religious practices like bell ringing and calls to prayer are subject to noise control regulations, legislation should consider the religious needs of the community.

2. Neighbour law and the meaning of "nuisance"

The legal principles applicable to neighbours of property and land are often referred to as "nuisance" principles, derived from English law and involving "the

repeated unreasonable use of land by one neighbour at the expense of another" (Van der Merwe and Olivier 1989:507). Nuisance, in general, also refers to hurt, harm or injury and is often associated with that which causes inconvenience, discomfort, annoyance, vexation or harm.

South African law distinguishes between different types of nuisances, some of which are more relevant than others in the context of this paper. Where an act, omission or state of affairs impedes, offends, endangers or inconveniences the public at large, we are dealing with a case of "public nuisance." Where the same state of affairs materially inconveniences another person in the ordinary comfortable use or enjoyment of land or premises, it is a case of "private nuisance." Where national legislation, regulations or bylaws have declared a condition or a state of affairs to be a nuisance, this is an instance of "statutory nuisance" (Church 2016:para 163). This paper examines church bells and calls to prayer in the context of a private and statutory nuisance.

Where the rights of neighbours are concerned, certain important principles have developed over the years. As a general rule, property owners may use their property as they see fit, as long as they act within the bounds placed on them by the law and with the necessary consideration of their neighbours' interest. The property owner's right of ownership must always be weighed against the interest of others. Although the basic principle is still one of wrongfulness, reasonableness and fairness are important factors in determining whether conduct is wrongful (Neethling and Potgieter 2015:125).

With regard to nuisance, a similar weighing of interests is required, taking into account all the relevant circumstances. A "disturbing noise" is a typical example of a nuisance. As early as the case of *Holland v Scott* (1881-1882:327), Judge Shippard stated:

> I take it the law is this: that a man is entitled to the comfortable enjoyment of his dwelling-house. If his neighbour makes such a noise as to interfere with the ordinary use and enjoyment of his dwelling-house, so as to cause serious annoyance and disturbance, the occupier of the dwelling-house is entitled to be protected from it.

According to Van der Walt (2010:259), neighbour law further distinguishes between nuisances in a narrower and wider sense. In a narrow sense, a nuisance such as loud noise interferes with a neighbour's use and enjoyment of the land and is sometimes referred to as an "annoyance." The remedies for this type of nuisance aim to prevent infringements (typically through interdiction) or to put an end to continuing infringements. In the wider sense, a nuisance causes actual harm or damage.

The typical remedies for a private nuisance are an interdict, an abatement order or an action for damages. An interdict seeks to prevent or stop a nuisance, and it may direct the offender to take positive measures to abate the nuisance. The provisions for obtaining an interdict in cases of common-law nuisance require that the applicant prove "a clear right, injury actually suffered or reasonably apprehended, and the absence of effective protection by any other ordinary remedy" (Van der Walt 2010:265-266). Where an applicant can prove that the nuisance is contrary to or in conflict with a statutory provision (such as national or provincial laws, regulations or bylaws), an abatement order is one of the simplest ways to resolve the matter (Van der Walt 2010:265). Administrative authorities are authorised, by applicable noise control regulations or municipal bylaws, to order property owners to abate nuisances upon their properties.

3. Reasonableness and harm

With reference to the case of *Regal v African Superslate* (1963), the court in *De Charmoy v Day Star Hatchery* (1967:191F-G) considered the position of South African law regarding nuisances. According to the court:

> The principle in our law is this: although an owner may normally do as he pleases on his own land, his neighbour has a right to the enjoyment of his own land. If one of the neighbouring owners uses his land in such a way that *material* interference with the other's rights of enjoyment results, the latter is entitled to relief. (emphasis added)

South African neighbour law expects a neighbour to tolerate a "reasonable level of interference resulting from the use of neighbouring land" (Van der Walt 2010:262). Only when the interference exceeds the level of "reasonableness" does it become unlawful and thus an actionable nuisance. This type of noise nuisance, in the form of loud and annoying church bells or other types of religious noise, has been the source of numerous disputes and much unhappiness in neighbourhoods. The principle is thus that any use of land (such as a church or mosque) that causes excessive vibrations or noise (in the form of church bells or the call for prayer) "that in any other way infringes the normal use and enjoyment of neighbouring land, in an ongoing and unreasonable manner, constitutes a nuisance in the narrow sense, which is unlawful and could therefore be interdicted" (Van der Walt 2010:263). Whether an interference exceeds the toleration expected of neighbours and is thus unreasonable is a contextual question and requires an assessment of the gravity of the harm suffered (Church 2016:para 174; Van der Walt 2010:263). Relevant contextual factors include:

> the suitability of the respondent's use of the property; the extent of the interference; the duration of the interference; the time or times at which the interference was caused; the sensitivity of the plaintiff to the particular immission or in general; the nature of the property and the nature of the locality where the harm was caused or where it occurred and the custom with regard to land use in that locality; and the possibility and practical or economical feasibility of actually preventing, terminating or mitigating the harm. (Van der Walt 2010:272-273)

In relation to the suitability of the plaintiff's use of the property, typical religious practices such as the ringing of church bells or singing of hymns may be normal for a property used for religious purposes but not for property earmarked as residential. With reference to the measure or extent of the interference, the harm suffered must be "material" or "substantial" to be considered unreasonable and not merely trivial. The test of the materiality of the harm is "objective and is expressed as the test of what a normal person residing in the locality would consider to be an excessive or intolerable interference" (Church 2016:para 176). In the words of the court as expressed in *De Charmoy* v *Day Star Hatchery* (1967:213):

> The test, moreover, is an objective one in the sense that not the individual reaction of a delicate or highly sensitive person who truthfully complains that he finds the noise to be intolerable is to be decisive, but the reaction of "the reasonable man" – one who, according to ordinary standards of comfort and convenience, and without any peculiar sensitivity to the particular noise, would find it, if not quite intolerable, a serious impediment to the ordinary and reasonable enjoyment of his property.

The duration of the interference, as well as the different types of sound, is also an important consideration. Interferences that are merely momentary or temporary might not be considered unreasonable unless they occur with some regularity (Church 2016:para 178). There are different types of sounds; for example, continuous sounds have little or no variation over a duration of time, whereas other sounds may vary in intensity. Intermittent sounds, such as church bells, are interspersed with quiet periods; impulsive sounds are characterised by relatively high sound levels over a very short duration of time.

According to guidelines posted by the City of Cape Town (Guidelines), long-lasting, high-level sounds can disturb or even damage people's sense of hearing and are also generally the most annoying. Although intermittent and impulsive

sounds appear less damaging to hearing, they tend to be annoying because of their unpredictability. In *Gien v Gien* (1979), the court found that the respondent acted unreasonably and unlawfully when he installed an apparatus that emitted gas explosions every two minutes, day and night, to keep baboons away from a vegetable garden. It is thus clear that the duration, time of occurrence, and level of the noise determine its effects.

With regard to the time of an interference, a noise that is reasonable at midday might be unreasonable at midnight. For instance, the ringing of bells "during ordinary working hours is unlikely to be considered a serious interference with the comfort of human existence" (Church 2016:para 179). In *Die Vereniging van Advokate (TPA) v Moskeeplein* (1982), an interdict was granted against a contractor for construction noise that was bearable during the night but unbearable during the day for advocates in adjoining offices, who could not conduct their normal business activities. With regard to the sensitivity level of the plaintiff, the standard of the ordinary person living in the specific locality is generally used to judge the gravity of the harm (Church 2016:para 180).

The last factor relates to the possibility as well as the practical or economic feasibility of avoiding or mitigating the harm. The harm may be considered less grave where it might have been avoided by "minor expenditure or similar precautionary action on the part of the complainant" (Church 2016:para 181). In *Regal v African Superslate* (1963), it was argued that certain necessary steps to prevent the repetition of a nuisance were excessively costly and not reasonably feasible. However, in *Gien v Gien* (1979), a sound apparatus that caused noise nuisance could easily be switched off during the night or even muffled.

Relevant factors and circumstances will vary from case to case. Specifically, in relation to the ringing of church bells, the Legal Advisory Commission of the General Synod of the Church of England has highlighted certain relevant factors that will be taken into account by a court. These include the "duration of the bell ringing, the time of day the bells are rung, the purpose for which the bells are rung, and the frequency of the ringing. Of course, the volume of noise created by the bells will be a key factor (and reliable measurements should assist the Court" (Legal Advisory Commission 2008:2). The court will also consider volume together with all the other relevant factors in light of the particular locality and context.

4. Legislative framework

Apart from a private nuisance in accordance with the common law as outlined above, applicable legislation, regulations and municipal bylaws can also declare a specific state of affairs to be a statutory nuisance. In this section, I briefly outline the legislative framework of statutory nuisance in South Africa.

Noise can be recognised as a form of pollution. In section 1 of the National Environmental Management Act 107 of 1998, pollution is defined as "any change in the environment caused by substances; radioactive or other wastes; or *noise* and where that change has an adverse effect on human health or wellbeing" (emphasis added). There are numerous sources of noise, such as industrial, transportation-related, building and domestic noise. Religious activities, such as the ringing of church bells, calls to prayer, and religious festivals and gatherings may fall under this heading, and they are often the subject of noise and nuisance complaints.

In South Africa, legislative and executive authority is divided among national, provincial and local governments. The authority to legislate on noise pollution rests solely with provincial legislatures and municipal councils. In 1992, the Minister of Environment Affairs issued noise control regulations under the Environment Conservation Act 73 of 1989. Since 1996, provinces have taken responsibility for these regulations, enacting their own noise control laws under Schedule 5 of the Constitution. Matters such as "nuisance" and "noise pollution," listed in Part B of Schedule 5, fall within municipal legislative authority, with oversight from provincial governments. Accordingly, municipalities have implemented various noise and nuisance bylaws.

The Western Cape Province introduced the Western Cape Noise Control Regulations under the Environment Conservation Act 73 of 1989, as amended (PN 200/2013), on 20 June 2013. These regulations, like others, differentiate between "disturbing noise" and "noise nuisance." A *disturbing noise* is objectively and scientifically measurable, based on its deviation from the existing ambient noise level. In contrast, a *noise nuisance* is subjective and refers to any sound that disrupts the convenience or peace of a reasonable person. Both forms of noise are prohibited under noise control regulations. Kidd (2005:175) argues that the reason for the distinction between types is that a disturbing noise can be objectively determined, whereas a noise nuisance is subjectively perceived. Church bells ringing every 15 minutes in a residential area may not exceed the ambient sound level by 7dBA and, therefore, may not be classified as a disturbing noise under the regulations. However, they could still disrupt or impair the peace of a neighbour, thereby qualifying as a noise nuisance even if they do not meet the criteria for disturbing noise.

Section 3 of the Western Cape Noise Control Regulations specifically bans operating or playing musical instruments, sound amplifiers, or loudspeakers that may cause a noise nuisance. It also prohibits emitting sounds through bells, alarms, whistles, loudspeakers, or devices that may disturb others. The City of Tshwane Council has also developed a Noise Management Policy, which was informed by the Gauteng Noise Control Regulations. It acknowledges that certain activities, like the regular ringing of bells or a muezzin calling from a mosque, are socially acceptable in any

well-functioning community but may sometimes be intrusive to individuals or groups living near the noise source. According to the policy, these activities:

> must be accepted by all as a healthy aspect of our urban community life, albeit as diverse groups and individuals within a community, but with the proviso that such activities are undertaken at reasonable times and are not excessively disruptive to other essential/normal activities or to the point of being a health hazard. (City of Tshwane 2004:32)

These activities must still be conducted in a reasonable manner, and therefore the policy provides further:

> Unless there are numerous and widespread complaints, unless the noise levels are excessively loud and incidents take place at unreasonable times (i.e. during the night) and unless complainants (persons affected) can justify the exact nature of how they are disturbed, then the community activities should be allowed. (City of Tshwane 2004:32)

Rights and values often conflict and must be carefully weighed, balanced and, at times, limited. In the context of religious noise nuisances, it is essential to establish a balance between the exercise of religious practices and the right to peace and quiet in residential areas. The following section explores how to strike an appropriate balance between these competing rights and interests.

5. Freedom of religion and striking a balance

Whether the ringing of bells or the call to prayer constitutes a nuisance must be evaluated with respect to religious freedom while also considering that religious expression is not unlimited. Section 15 of the Constitution provides broad protection for religious freedom, encompassing individual and collective rights. In addition, section 31 guarantees the right of individuals to practice their religion as part of a community. These provisions recognise that the right to hold religious beliefs is inseparable from the right to express and practice those beliefs. This includes private and public, as well as individual and communal, acts of worship or observance. Religious expressions such as music, church bells, and calls to prayer are ways in which believers manifest their faith, and these practices are protected under section 15, in conjunction with section 31, which affirms the rights of religious communities to practice their beliefs collectively.

The collective dimension of the right to manifest religion or belief is particularly significant, as state intervention to regulate or restrict religious manifesta-

tions is more likely to occur when these expressions are carried out "in community with others" rather than practised individually (Krishnaswami 1960:21). The Muslim call to prayer (adhan or azan), church bells during divine service, and liturgical bell ringing are legitimate expressions of religious belief. Moosa (2021:24) highlights that the adhan serves primarily a spiritual purpose, functioning as a reminder for Muslims to heed the call to prayer rather than compelling them to do so. The volume of the adhan does not determine the strength of a Muslim's faith, and mosques that refrain from using loudspeakers or microphones continue to fulfil their religious role effectively.[2] Similarly, the regular ringing of church bells for religious purposes should not be regarded as a significant burden on the public but as a socially acceptable practice. As such, church bells may continue to be used as part of divine services, serving their traditional role in religious observance. An example of religious practices involving bell ringing can be found in canon law. In England, bell ringing is not only part of ecclesiastical law but also of the canon law of the Church of England. For instance, Canon F8 addresses the use of church bells, while Canon B11 pertains to the ringing of bells in relation to morning and evening prayer. These canons highlight the significance of bell ringing as an integral part of religious observance within the church.

The Legal Advisory Commission of the General Synod of the Church of England advises and publishes statements on non-contentious legal matters of general interest to the church (Legal Advisory Commission 2008). The commission holds the view that where clergy are required to ring the church bells – or at least one of them – as demanded by ecclesiastical law (such as to call the parish to public worship), they will have a valid defence against an action alleging private nuisance. According to the commission, "If canon law has directed a particular activity, there can arguably be no liability for nuisance caused thereby. This defence is likely, however, to be limited only to what would be strictly necessary to discharge the canonical obligation" (Legal Advisory Commission 2008:2). However, the chiming of a clock would not fall within these provisions, and ringing the bell or bells on other occasions might be treated differently. It may be customary to ring church bells after a wedding, at festivals, to mark national thanksgivings, or to indicate the time of day. However, if such ringing interferes with a person's use and enjoyment of his property, it can constitute a nuisance at common law.

In Germany, the ringing of church bells is regulated by the Federal Immission Control Act. As long as the noise constitutes liturgical bell ringing in the traditional way, it does not constitute a burden to the public, and it is seen as a "socially

2 For an overview of the religious origin and purpose of the adhan in South Africa and its possible status as a protected cultural heritage symbol, see Moosa (2021).

adequate immission" (Robbers 2005:885). However, courts have found that the ringing of church bells to indicate the time of day "must be somewhat less loud." A similar approach has been taken in relation to the Muslim call to prayer. The muezzin call has been found to be legally acceptable, subject to the fact that when it is intensified by loudspeakers, the legitimate needs of neighbours must be taken into account. Accordingly, it has been held that:

> liturgical bell ringing, muezzin calls, or else are not exempt from noise laws, but the noise laws and their application have to take into account adequately the religious needs. The government has to find an adequate balance of all needs concerned (Robbers 2005:886).

While this paper focuses on South Africa, religious noise is a challenge across the African continent, particularly in densely populated countries like Nigeria, which boasts one of the largest concentrations of churches globally, along with a significant number of mosques. Key religious activities identified as sources of noise nuisance in Nigeria include vigils, Christian morning cries, Muslim calls to prayer, daily Christian programs, and general noise from worship centres. Views on this issue differ. Some advocate for absolute freedom of religion, arguing that government or legal authorities should not interfere in religious matters. Others believe that religious activities should be regulated to prevent disruptions to public order (Ekhator 2023:74). A balanced approach suggests that when religious practices become a public nuisance, appropriate legal regulation is necessary. Any disputes arising from such regulation should be resolved with fairness and justice. No fundamental right, including freedom of religion, is absolute. In South Africa, the Constitution allows for limitations to these rights, provided that such limitations are reasonable and justifiable in an open, democratic society based on human dignity, equality, and freedom. The regulation of religious practices, such as bell ringing, may be necessary to maintain peace and tranquillity, especially in areas with diverse faith communities. In the case of church bells ringing to indicate the time of day, the sound should be less intense, as it serves a social rather than strictly religious purpose. This type of ringing could potentially constitute a noise nuisance, subject to regulation under applicable noise control regulations and bylaws.

It has been argued that where certain acts causing a nuisance have been performed in the exercise of constitutional rights, "the private law of nuisance must be developed so as to alter the outcome of the traditional balancing exercise in a manner that permits the interference" (Du Bois and Reid 2004:598-599; Van der Walt 2010:314). The argument is thus for a shift in the

traditional approach to nuisance, more particularly a development of the private law of nuisance so that certain interferences (such as religious noise) would be permitted under the influence of human rights principles (such as religious freedom), "whereas they would have been proscribed in traditional nuisance balancing" (Van der Walt 2010:314). This might be achieved by, for instance, expanding the range of factors taken into account in the balancing exercise in order to include interests "sanctioned by the human rights regime" (Du Bois and Reid 2004:599).

Accordingly, nuisance provisions remain a valid and independent basis for legal challenges that can limit freedom of action as long as they do not deny the existence of other human rights-protected interests. However, both in terms of the law of nuisance or human rights law, courts will have to make a substantive decision "as to where the line has to be drawn between conflicting interests – a decision that is inescapable" (Van der Walt 2010:314). Usual or unusual practices of a religious minority or majority could still be unreasonable and constitute an actionable nuisance for neighbours.

One of the earliest such examples was *Prinsloo v Shaw* (1938), where the applicant was the owner and occupier of a house in a residential quarter of East London, and the respondent was the leader of a religious body known as "The Latter Rain Assemblies." The applicant complained that the religious services held on the respondent's land were accompanied by:

> very loud and strident singing and yelling, singing in a monotonous whine and chant, frenzied praying, stamping of feet, clapping of hands, groaning, all in such a manner that applicant and his family are seriously incommoded, disturbed, disquieted and interfered with, their comfort seriously diminished and the value of applicant's property diminished (*Prinsloo v Shaw* 1938:571).

The question in dispute was whether the noise materially interfered with and diminished the comfort and convenience of people residing in the applicant's house. The court held:

> A resident in a town, and more particularly a resident in a residential neighbourhood, is entitled to the ordinary comfort and convenience of his home, and if owing to the actions of his neighbour, he is subjected to annoyance or inconvenience greater than that to which a normal person must be expected to submit in contact with his fellow-men, then he has a legal remedy (Prinsloo v Shaw 1938:575).

A final interdict was granted against the respondent, not because the religious services were unusual for the area, but because they were held "at such times and in such manner as to constitute a nuisance" (572; 575).

More recently, the Zeenatul Islam Masjid, located in District Six of the City of Cape Town, has asked the city to exclude calls to worship from the noise control regulations and bylaws. They argued that the:

> different calls to worship by mosques, churches and other places of worship [are] integral to the fabric of District Six and this diversity has spread to the rest of the world. Cape Town – the birthplace of Islam in South Africa 325 years ago – prides itself as an embracing city of many cultures and faiths. The [adhan] needs to be understood in this context. (Richardson 2019)

This request came after numerous complaints were lodged against the Cape Town mosque on Muir Street, claiming that the adhan constituted a noise nuisance. However, the Muir Street Mosque committee contended that the adhan or any other call to prayer can never be regarded as disruptive noise (The Voice of the Cape FM 2019). The key issue at hand is whether the specific "religious noise" is reasonable. Even if it complies with noise control regulations and bylaws, it may qualify as a nuisance if deemed unreasonable. Notably, the applicable legislation does not exempt religious sounds, including the call to prayer. However, the City of Cape Town has expressed a willingness to engage with communities to explore amending noise bylaws to exclude religious sounds such as the call to prayer.

Another recent case, *Ellaurie v Madrasah Taleemuddeen Islamic Institute* (2020), involved a property owner who sought a court interdict against his neighbour, the Islamic institute. Mr. Ellaurie, whose house was across the street from the madrasah, complained that the call to prayer could be heard from his property, disturbing his peace and quiet. He argued that the noise deprived him of the enjoyment of his property. The case raised issues of noise nuisance and the balance between religious practices and the right to peace and quiet in residential areas. The High Court in Durban granted the requested interdict. The court ruled that the constitutional right to freedom of religion does not extend to practising religion in a manner that includes the public broadcast of the call to prayer. It emphasised that neighbours have the right to enjoy their residential properties peacefully, and that this right must be respected by others, including places of worship such as mosques. The court further determined that the neighbour had proved that the call to prayer infringed upon this right. As a result, it granted an interdict requiring the mosque to ensure that the call to prayer could not be heard by the neighbour.

In an opinion published in *The Conversation* (Van Coller 2020), I argued that the court's decision in this case was flawed for several reasons. It prioritised the neighbour's right to use and enjoy his property without giving sufficient consideration to the reasonableness of the alleged disturbance. Specifically, the court did not thoroughly evaluate whether the mosque was acting within its rights and behaving reasonably. It also failed to consider the constitutionally protected right of individuals to practise their religion, including the call to prayer. Additionally, the court overlooked the city's existing noise control regulations, which should have been taken into account when assessing the case. In relation to section 15 of the Constitution, Judge Mngadi incorrectly held that this provision "guarantees freedom of religion, it does not guarantee practice or manifestations of religion. The Call to Prayer is a manifestation of the Islam religion, it is not Islam itself" (para 16). This view goes against numerous Constitutional Court judgements that have acknowledged that the right to freedom of religion includes the right to manifest such beliefs by worship and practice, teaching and dissemination.[3] The decision was also criticised by Moosa (2021:12), who stated that "the Judge also confuses the integral role of the adhan in Islam and fails to draw a distinction between the status of the unamplified and amplified adhan in Islam."

The madrasah appealed to the Supreme Court of Appeal (SCA), which upheld the appeal. In *Madrasah Taleemuddeen Islamic Institute v Chandra Giri Ellaurie* (2023), the SCA confirmed that the test for assessing the impact of a noise is whether it could be considered "reasonable" given the circumstances and context in which the interference occurred. For Mr. Ellaurie to succeed in his interdict application, he had to prove that the madrasah's actions unreasonably interfered with his established right to the use and enjoyment of his property. The court emphasised the need to balance the rights of both parties while considering the reasonableness of the alleged disturbance (*Madrasah Taleemuddeen* 2023:para 11). The court found that Mr. Ellaurie failed to adequately explain the nature and volume of the noise produced by the adhan, nor did he provide evidence of what would constitute a reasonable adhan in the given circumstances. Contrary to the High Court's findings, the SCA held that the right to freedom of religion, protected under section 15 of the Constitution, includes the right to observe and manifest religious beliefs. The court emphasised that a determination of the reasonableness of the alleged interference with Mr. Ellaurie's rights must also consider these competing rights (*Madrasah Taleemuddeen* 2023:paras 16-18).

3 The South African Constitutional Court has confirmed this view on numerous occasions. See *Christian Education* (2000); *Prince* (2002); *S v Lawrence* (1997).

This approach is more aligned with the view of South Africa's Constitutional Court, which has affirmed that the Constitution requires society to affirm and reasonably accommodate differences, rather than merely tolerate them as a last resort (*MEC for Education, KwaZulu-Natal and Others v Pillay* 2008). It has emphasised that the Constitution is founded on the values of tolerance, diversity and equality, and that accommodating the country's rich variety of religions aligns with these fundamental commitments. According to the Constitutional Court, the principle of reasonable accommodation in matters of religion requires that the state or community must take positive measures and, if necessary, bear additional hardship or expense to ensure that all people can participate fully and enjoy their rights equally. This principle ensures that individuals are not pushed to the margins of society simply because they do not or cannot conform to prevailing social norms (*MEC for Education* 2008:para 73). Sections 15 and 31 of the Constitution recognise that the right to hold religious beliefs is inseparable from the right to express and practice those beliefs. This includes private and public, as well as individual and communal, acts of worship or observance.

6. Conclusion

This paper has emphasised the importance of the right to manifest and practise one's beliefs as a core part of religious freedom. The South African Constitution, alongside other laws, guarantees this right, protecting both private and public religious observance. Practices such as church bells, chimes, and the call to prayer must be conducted with respect for others' rights, promoting peaceful coexistence in a diverse society. While religious expressions such as bell ringing and calls to prayer are subject to noise control regulations, these laws should be applied sensitively to the community's religious needs.

With regard to calls to prayer, Moosa (2021:24) argues that mosques play a crucial role in fostering good neighbourly relations by educating the surrounding community about the purpose and significance of the adhan in Muslim religious practice. Such efforts can help to build understanding, reduce misunderstandings, and prevent unnecessary lawsuits or complaints that may stem from possible or perceived Islamophobia. Legislation should balance competing rights, ensuring that religious practices comply with laws while respecting religious freedoms. As Krishnaswami (1960:31-32) pointed out:

> Thus while public authorities may legitimately regulate the exercise of the right to freedom of worship "in community with others" and "in public" in the general interest, taking account of rival demands, it must be affirmed that as a general rule everyone should be free to worship in

> accordance with the prescriptions of his religion or belief, either alone or in community with others, and in public or in private; and that equal protection should be accorded to all forms of worship, places of worship, and objects necessary for the performance of rites.

The Constitutional Court (in *Prince v President, Cape Law Society* 2002) affirmed the universal right to choose one's religion, the right to openly practise one's faith, and the freedom from interference in observing or expressing religious beliefs. This position was further affirmed by the Supreme Court of Appeal in *Madrasah Taleemuddeen Islamic Institute v Chandra Giri Ellaurie* (2023), which emphasised that the core of the right to freedom of religion lies in an individual's entitlement to hold religious beliefs of their choice, to express those beliefs openly without fear of interference or reprisal, and to manifest them through worship, practice, teaching (para 17). Religion is dynamic, requiring rituals and practices to evolve in response to changing circumstances. Striking a balance between the right to freedom of religion, its public expression, and the need for inclusivity and legislative regulation is a complex task. The government must carefully consider and address these competing needs. The preamble of the South African Charter of Religious Rights and Freedoms emphasises that with rights comes the duty to respect the rights of others. When one exercises those rights – whether it is the freedom of religion or the public expression of those beliefs, such as through church bells or calls to prayer – it is essential to act within the bounds of the law and uphold ethical principles. Fairness, reasonableness and tolerance should guide all actions to foster harmony in a diverse society.

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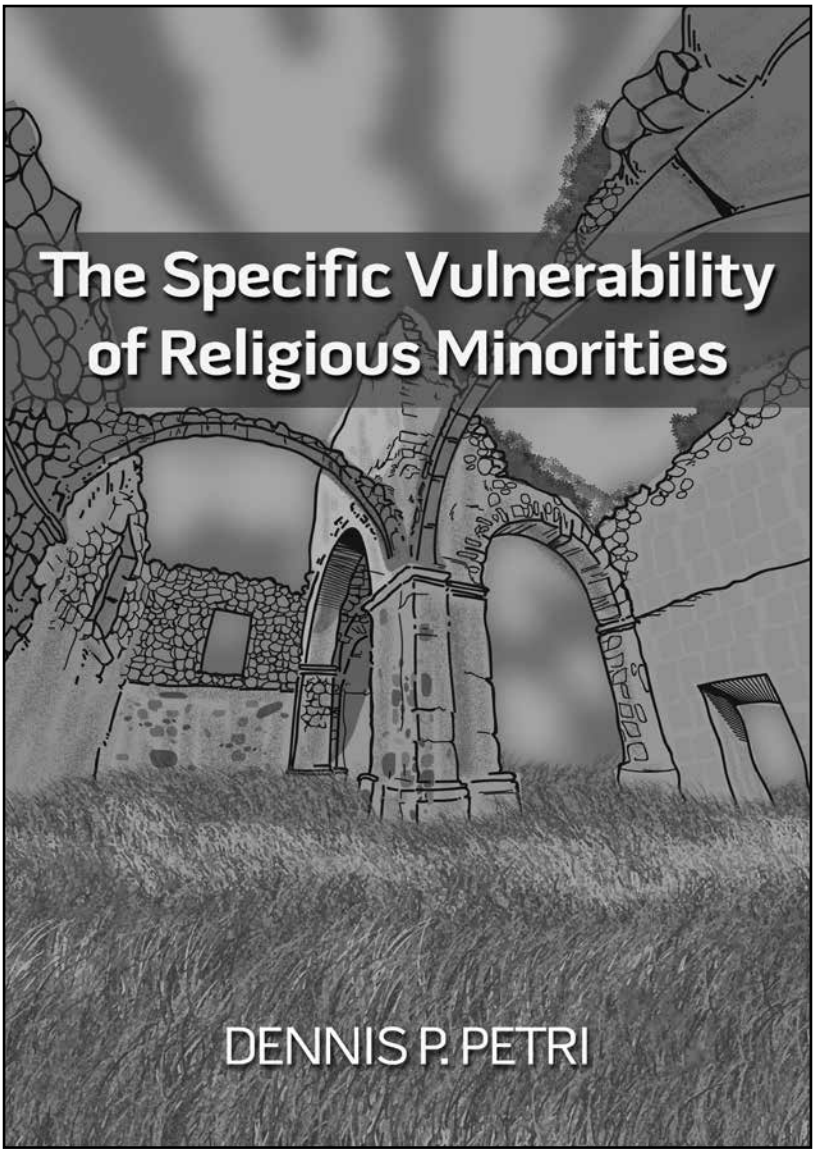

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The conceptual placement of atheism in secularist and post-secularist conceptions of society

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Abstract

This paper draws a comparison between the intellectual placement afforded to atheism in social contexts with a foundationally secularist reflex and in those that are now moving beyond such secularist impulses. Describing these two kinds of contexts ideal-typically, that is, by placing them phenomenologically shows that atheism can be seen as occupying either a default no-religion position, placed *above* faith orientations, or a religious orientation within available alternatives, hence placed *amongst* faith orientations. The relevance of this issue for Africa is that many of these underlying assumptions about the treatment of atheism remain unacknowledged in Africa (as is the case in other democratic geographies). These assumptions thus exert influence via legal, political and social processes, without these effects being critically weighed.

Keywords

Atheism, modernism, secularism, post-modernism, conceptual placement.

1. N/aye-theism

Atheism remains frequently prominent in the news. For instance, *The Times of Israel* recently published two blogs by physicist Richard Kronenfeld on "Why are so many scientists atheists?" (Kronenfeld 2022a; Kronenfeld 2022b). In my own South African[2] and church contexts, a book on becoming an atheist, written in

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2 The South African and especially the Afrikaans news and related mass media have long viewed religion more favourably than the media in e.g. the UK (see Connolly-Ahern and Golan 2007:63-76). That is re-

evangelising format by a former church minister (Retief 2022[3]), received much media attention (e.g. Eybers 2022, Burgess 2022). In popular book format internationally, the so-called "four horsemen" of atheism (Hitchens 2019, with reference to Richard Dawkins, Sam Harris, Christopher Hitchens and Daniel Dennett; cf. respectively Dawkins 2006, Harris 2005, Hitchens 2007 and Dennett 2007) may have attracted the widest readership, but more academic analyses (such as Burton 2020, Grey 2018 and White 2014) show that the topic of unbelief remains intellectually attractive and not limited to those publications that display perhaps a touch of either *Schadenfreude* or self-righteous anger.

Naturally – as often stated orally by sociologist Michael Burawoy, though to my knowledge he has not published this quotable expression – what is *now* is not necessarily *new*, and this is the case also with atheism. This phenomenon is recorded for almost as long as religion has been recorded (see notably Whitmarsh 2015);[4] unbelief is by no means, as is often assumed, a modern invention or a Modernist manner.

What is different about the past two-plus centuries in Western societies, though, is first that a religiously-oriented society (more or less) cooperatively permitted within its socio-political purview what was understood as its antithesis, a-religiosity, to develop. Moreover, in some instances this a-religiosity developed into something like a nationally self-understood public anti-religiosity,[5] at times enforced by legal means. This led to the replacement of (most commonly, Reformation) Christianity in almost all public institutions (with private education remaining a sort of exception), as official atheism eventually took hold in almost all such institutions. (Ideologically this is also the case in churches, many of which endorse – to keep here to the traditional terminology, though the realities are more complex than the binary suggests – the separation between church

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flected both in directly religion-related reportage or comment columns (e.g. Claassen and Gaum 2012) and in the inclusion of faith-related comments by people interviewed in the aftermath of a crisis event (as analysed by Froneman and Lombaard 2011:166-184).

3 Conversion in the opposite direction on equally (but not similar) unsatisfying arguments is also found; see e.g. Flew 2008.

4 As my colleague Eben Scheffler has pointed out, informally, which I here acknowledge with much thanks, the Bible reflects similar and parallel thoughts:
- Psalm 14:1: אָמַר נָבָל בְּלִבּוֹ אֵין אֱלֹהִים, with the ethical conclusion we know well from modern debates too, but with which we have philosophical difficulties of cause and effect: אֵין עֹשֵׂה־טוֹב הִשְׁחִיתוּ הִתְעִיבוּ עֲלִילָה.
- A more general confession of bewilderment or of ignorance, perhaps implying agnosticism too, is found in Ecclesiastes 7:24: רָחוֹק מַה־שֶּׁהָיָה וְעָמֹק עָמֹק מִי יִמְצָאֶנּוּ.
- In Luke 11:15-16, Jesus' works are ascribed to a source other than God: τινὲς δὲ ἐξ ὑτῶν εἶπον· ἐν Βεελζεβοὺλ τῷ ἄρχοντι τῶν δαιμονίων κβάλλει τὰ δαιμόνια. ἕτεροι δὲ πειράζοντες σημεῖον ἐξ οὐρανοῦ ἐζήτουν παρ' αὐτοῦ.
- The famous matter of blasphemy against the Spirit approaches this issue too. See Matthew 12:31-32: ἡ δὲ τοῦ πνεύματος βλασφημία οὐκ ἀφεθήσεται. καὶ ὃς ἐὰν εἴπῃ λόγον κατὰ τοῦ υἱοῦ τοῦ ἀνθρώπου, ἀφεθήσεται αὐτῷ· ὃς δ' ἂν εἴπῃ κατὰ τοῦ πνεύματος τοῦ ἁγίου, οὐκ ἀφεθήσεται αὐτῷ.

5 This has occurred in the Soviet Union, the post-Soviet Czech Republic (see however Hutt 2022), Estonia, Australia, Angola, and England. The practice is most official in France, with its *laïcité* policies, and it is present, though perhaps most inconsistently, in the USA.

and state; cf. Lombaard 2021:1-19.) Faith yielded to (what was understood as) non-faith.[6]

Second, this action is based on its own religious commitments (to summarise this Christian ethic: love thy neighbour; love thy enemy; and so forth); in doing so, acting against its own inherent impulses. (The reflexes in Roman Catholic, Orthodox and Calvinist theologies in particular are to subsume the world, i.e. to rule over it, expressly for the sake of the benefit of the citizens. The evangelical-charismatic-Pentecostal strands of theology have inherited this reflexive inclination, as seen again in the presidential politics over the past decade in for instance the USA, Brazil and Hungary, as possible examples.) The religio-nationalist Zion theology we know from the Hebrew Bible and the pro-government reading of Romans 13 in favour of hierarchically oriented societies, to name two examples, were no longer used in a self-serving manner to support the state's recognition of an established church ("establishment" meant here in England's sense of the term, where government was understood as *fidei defensor*). Historically speaking, this was a remarkable move of scriptural hermeneutics, theology and politics. Through a complex set of circumstances, which also required revolutions in both of the two founding countries of democracy (France and the USA) (the two usual instances of the first Islandic parliament and of the Magna Carta predate the modern era by too much to be relevant to the argument here), the softer side of Christian theology came to replace entrenched royalist inclinations.

Third, on what is notable on the past two centuries plus of pre-democratic societies turning away from full religious integration in all aspects of life, is the scale of this turn towards unbelief. Though numerically amongst the tally of societies a grand minority, a minority of perhaps only one if this turn is indeed unique in human history, modern Western(ised) civilisation is so vast and so successful in all respects but the ethical (nuanced, naturally), that the distinctiveness of this turn cannot go unnoticed. Indeed, the contrary is not infrequently posited (though it is difficult to argue conclusively) that Western societies' move towards secularism was an enabling and perhaps even necessary sociological and philosophical factor in their matchless accomplishments in virtually all spheres of life. The public hold of religion, specifically Christianity, had – in this line of analysis – to be weakened in order for the other aspects of the human endeavour to thrive.

6 The distinctions between faith and belief, between religious faith and non-religious faith, and between religious belief and non-religious belief do not hold up from the perspective of post-secular phenomenology. Though one could devote a separate publication to debating such distinctions (drawing on e.g. Naudé 2023; Sands 2018; Schrijvers 2016; Bailey 2001), the eventual calls made would simply be mine, as would be the case too with any other author who writes on such distinctions. The distinctions cannot be definitively made or indefinitely upheld. This is an instance where Wittgenstein's (1953) insight that many philosophical problems are in reality language problems would be valid.

It is within these parameters of the ancient and the current that the place afforded atheism within the modern world – characterised by democracy, rationality, naturalism (i.e. a non-metaphysical orientation), atomism, optimism, logical positivism, detached or clinical objectivity and more – may be outlined. The relevance of this situation for Africa is that many of these underlying assumptions remain unacknowledged on this continent too. These impulses of thought thus exert their influence via legal, political and social processes, usually without these effects being critically weighed.

2. Aha!theism

The kinds of synonyms we may in our time associate with atheism include irreligiosity, unbelief and secularism, with each of these terms carrying their own problems of etymology and nuance. Being pagan (which is these days claimed with pride in some circles) or infidel (which seems to enjoy no similar esteem) or heathen (held somewhere in between) has similarly knotty associations; the same is true for the terms "unaffiliated," "without faith," and "apostate."[7] Today, in traditionally Christian contexts, religious "nones" is a common designation (see e.g. White 2014).

At a somewhat extended distance, associated convictions, such as on the absence of life after death and, in a contrary direction, on the absence of meaning in life,[8] may be included. Within this mix, the concept of the soul is variously retained as something on a continuum from substantive and eternal, to a metaphorical indication of something humanly perceptible, to a term that refers to an idea without substance, the use of which leads only to confusion (cf. Murphy 2006). Although there may be logical consistency in holding to several related, cogent terms and positions associated with unbelief at the same time, as with all important ideas, the variance one finds can at times be surprising. For instance, although all of us have become accustomed to the common adage that ethics and morality do not require religion, in the same way as people are said not to require God in order to be good and/or to do what is right (e.g. Hare 2019), the case for atheist spirituality

7 Such terms, like a few others too (e.g. idolator), however, may well often relate to still holding to aspects of traditional belief, though not in any orthodox manner, or perhaps even in the inverse (as with Satanism). Closer to the meaning of "doubter" lie terms such as sceptic and agnostic, each with their own nuance. Terms such as *giaour* and *goy* have more specific othering connotations. Yet another category consists of people who are unconcerned about religious matters: they may be quite well informed or not, and they do not see themselves as attracted to any form of religious adherence, expression or rejection (though, of course, nobody escapes the implicit religiosity associated with daily life, language and institutions or with significant rituals; cf. Bailey 1998). The term "theocracy" has become in the current US political scene a (historically inaccurate) liberal denigration of conservative political religiosity, which now hinders other usages of this term.

8 The opening words to Camus's *Le mythe de Sisyphe* remain a typifying reference to this matter: "Il n'y a qu'un problème philosophique vraiment sérieux: c'est le suicide" (Camus 1942:17).

(McGhee 2021, Harris 2015, De Botton 2013, Antinoff 2009, Comte-Sponville 2006)[9] seems still to contain a contradiction in terms for many people. Because of the idealistic visions, even "purist" in a sense, that are often held around constructs such as "believer" and "non-believer," a package of ideals that may include belief in God but not in an afterlife, or in an afterlife but not in God, or in a philosophically meaningful life without any transcendental anchoring, and so forth, seems unsound to many. Somehow, we want neatly delineated convictions. A sense of order and coherence seems to be required by observers of religiosity and non-religiosity ("congruence," in the language of Chaves 2010), in order to attribute authenticity to the people concerned (but perhaps there are other grounding motivations too).

Yet the diversity of human reasoning and conceptualisations, awarenesses and orientations, along with the recognition that none of us are consistent in everything we believe or give expression to, means that these intricacies are the realities of life, banal or grand as they may be. Moreover, in all matters our descriptions often fail us in truly conveying the sensed meaning we want to convey; the more so regarding the basics of our human experience (cf. Lombaard 2008:95), including our sense of, for or towards the religious. Since only in rare instances can people live without a founding metaphysics of some sort, which typically includes the dynamics of revelation in some way (cf. Berkhof 2013, especially the Prolegomena), faith finds itself innately at odds with the rationality of logic.

There is such a strong divide within the cultural tradition of logic in which we find ourselves, that the piety for instance intended by a non-academic Afrikaans book title such as *Ek glo nie, ek weet* (*I don't believe, I know* – implying that faith lies on the same existential and rational level as facticity; De Villiers and De Villiers 2014) therefore does, outside of a small pietist circle of positive reception, the case of faith as a phenomenon *sui generis* more harm than good. Almost diametrically opposed in title, the Dutch *Het algemeen betwijfeld christelijk geloof* (*The generally doubted Christian faith*; Kuitert 1992) deals much better with the questions that rationality poses to faith. In the sensed reasoning of our current Modernist-influenced contexts, the cognition (and perhaps intuition) of / from / on faith and the rationality of logic stand, in public spheres at least but often too on more intimately personal levels, in a difficult congruence to one another. Within faith, there is substantial confluence (Anselm's famous formulation of theology as *fides quaerens intellectum* being already a pre-modern example); viewed from outside, as it were, the divergence of faith and reason may well already seem deep. On Modernist grounds, the two ratiocinations are irreconcilable.

9 The question posed by Taira (2012:388-404), "Atheist spirituality: a follow on from New Atheism?" deserves further exploration.

Given that the era of the modern and the corollaries of Modernism – democracy, rationality, naturalism, atomism, optimism, positivism, objectivity – all work together in some loosely collated manner to constitute secularism (as understood today, i.e. since Holyoake 1896; see however Vanhoutte 2020:1-9), it becomes possible to construct an ideal-typical (in the Weberian sense[10]) view of atheism. To begin with, a-religiosity in a Modernist context understands itself as the opposite – in different senses – of all the negatives that Modernism attributes to faith. To be sure, these characteristics are inherent in the very nature of faith, and what Modernism sees (and objects to) is therefore not a misconstrual; the disagreement (as with many important issues) begins at the point of departure.[11]

These features of faith include, among others (here not separating traits inherent to the phenomenon of faith itself from the social actualities involved), being unverifiable and hence non-empirical; varied and variable; pliable and compliant (i.e. to the chance vagaries of each social and even geographic context); and drawing on unfirm impulses in such dissimilar, even contradictory manners as to remain constantly unfalsifiable (in the Popperian sense) and, hence, intellectually lame. Dealing with deep-seated subjectivities of various sorts – personal, sociological, historical and more – a firm sense of what is indeed theologically valid or dogmatologically correct cannot be gained from religion; not to mention the acts elicited and/or prohibited on these bases; how religion may react to a context, or steer it, and how religious people will act or react in various circumstances remains often unpredictable. In fact, precious little can be ascertained: all the key concepts of (for instance) Christian theology remain on apprehensive rather than apprehensible grounds, in contrast to the natural sciences, law, languages, music, and other academic disciplines. From the foundational events to the grounding documents, to the central teachings, to the understanding of all of these (hermeneutics), to the daily practices based on these cores of faith, everything remains tenuous. The holy cannot be proved, though it has in history been enforced; the details of theology and their implications and applications remain ever uncertain and often contrived; the validity of all the foregoing cannot in any manner be ensured, measured or assured (with the methodologies of positivism requiring confirmation, calculated precision and hence certainty).

Therefore, the *topoi* covered in, for instance, the academic genre of introductions to the Bible or comprehensive works of systematic theology may in some ways be interesting, but they are always either literary or speculative, based as

10 On this methodological endeavour, therefore, the details of the forms of atheism (Gray 2018), secularism (Taylor 2007), etc. are not ignored but are included, albeit at arm's length, from a sufficiently distanced vantage point so as not to repeat the details here assumed as given.

11 The expression "the point of departure" thus here intends both its possible meanings.

they are on historical contingencies rather than on eternal truths (as they are oft purported to be) or on fixed facts (on which basis more or less all aspects of Modernism operate). Whereas Christians would claim those traits as valuable, involving the mainstays of faith in the forms of revelation, tradition, or discernment (at times formulated as surrender, adherence or obedience), for the natural reflexes of Modernism, such ambiguities simply undermine hope that faith or religion could be married with reason. Hence, we observe the rise of the "four horsemen" of atheism mentioned earlier, as well as many more.

3. Elevated atheism

Atheism, therefore, stands beyond such exigencies. In personal views and in the role a-religiosity assumes within society, atheists contend, a position can and therefore should be taken beyond the fray of all of the subjectivities that involve humanity in indeterminate metaphysics. Elevated above the personal and free from societal commitments, yet escaped from the above-human, atheism is placed in an intermediary status: not involved in the ephemeral or in the provisional and fully committed to the unmetaphysical – i.e. reliant on the physical – unbelief finds itself in the almost tranquil rational position. From this default location, all can be observed – objectively, or so it is claimed. In a non-committal, disinterested way and without prejudice, the partisanships of faith can, for the good of all and to the benefit of society as a whole, be removed from public life. Naturally, what the individual, in the atomist conception of the political sphere as final arbiter of everything, decides to do privately, including the *in camera* practice of religion, lies outside the limited parameters of state power, which encompasses government, lawmaking and policing. However, the sphere of public life, the proper terrain of the organs of state, should be emptied of the jeopardies of religion. All official activities, and all activities outside of officialdom but still in the public domain such as business and education, ought properly to be free of religion.

In this conceptual placement of atheism in secular societies, public atheism occupies the seat of an objective, religion-free arbiter; relative to this authoritative position, anything that deviates from the default zero-religion position in society requires clarification and justification. All public religious exercises hence, by definition, must defend themselves in the court of public a-religiosity, if such an expression of faith is to be accepted at all. Public expressions of faith are suspect and require examination. Any unpermitted religious manifestation is to be excommunicated from public life; the disinterested throne of unbelief will decide on what is permissible; public displays of faith are possible, but only as and when they are approved. Because atheism stands beyond faith, outside the margins

of religion, it can claim to function in this way, as a neutral adjudicator of other beliefs. Atheism holds a privileged position, precisely because it is non-religious. That fundamental criterion, in this ideal-typical portrayal, authorizes unbelief to evaluate belief.

4. Relegated atheism

In this last-mentioned respect, religious matters stand alone. No other aspect of the human enterprise requires this kind of outside appraisal in order to achieve legitimacy, certainly not in democracies. (In totalitarian societies, by contrast, the aesthetics of art may be ideologically prescribed.) Food is not evaluated by Non-food, in a manner of speaking metaphorically akin to the formulation above; rather, food is evaluated by specialists in food. Sport is not evaluated by Non-sport. Art is evaluated by specialists in art; dancing, literature, travelling, psychological or familial wellbeing, law, music – all are assessed by experts in the respective fields. Only religion has followed a different curve in democratic societies. Religion has remained, all protestations to the contrary, an exceptional case in society; the special relationship between (using, again, the too simplistic traditional formulation) church and state has not been broken. That bond is as strong as ever; the magnetic polarities have merely been inverted, from the previous attraction to current rejection.

That last expression may be nuanced by reformulating it as follows: from earlier (confessed and hence legislated) attraction to current (confessed and hence legislated) rejection. In either case equally (though differently) so, however, the *nominalism* of the confessed commitment is indicated both by the superficiality of the commitment and by the complexities of reality that belie the simplicities of the confessed convictions. The latter is evidenced in modern democracies in three ways. First, no two countries that hold to the self-understanding of being secular states are exactly the same with regard to how this confession is held; second, no individual state is fully consistent in applying its confessed secularist constitutional orientation throughout society (not even the most extreme such state, the Soviet empire, could rout Polish Catholicism, which went on eventually to produce a pope during this period); and third, no state could truly break its special linkage connecting law and constitution to religion, as indicated above (one can find examples that illustrate this from every single democracy).

The secularist state confession is not only nominal, as stated above; it is also false. There has never been an a-religious government or society. With the statistical trends towards greater religiosity on the global level (though some areas, such as England, are still bucking this wider trend), by now amply attested to in the literature in demography and sociology, it is difficult to foresee a fully a-re-

ligious democracy anywhere in the world in the next century and more. Apart from these political realities, and since much of our human existence remains inescapably coloured by aspects of religion (as demonstrated by Bailey 1998 with his concept of implicit religion, among a few other complementary arguments), there is a main concern for this necessarily limited contribution, as well as for the conceptual (philosophical-phenomenological) matter that follows from section 3 ("Elevated atheism") above. This is the conceptual concern that failing to understand atheism as itself a religious orientation implodes on itself.

As I stated in a brief essay published by the University of Pretoria (Lombaard 2022), a cluster of (now dated) related suppositions on this matter are each individually erroneous. These assumptions include the following:

- that *secular* implies *a-religious* (which is historically inaccurate; see Vanhoutte 2020:1-9);
- that an a-religious position implies a faith-free position (which is false, akin to claims to objectivity, or, more simply, comparable to the claim that one speaks without an accent; in reality, *religionlessness* is as much a position of faith on faith as any other; see Benson 2013:12-29); and
- that a secular or a-religious position is a neutral stance taken within democratic societies (which it clearly is not; a secular or a-religious standpoint is by definition an actively taken position on religion, at times even enforced by the armed apparatus of the state, e.g. currently in France…).

This cluster of corrections is typical of a set of dearly held positions within one conceptualisation of the world that is being replaced by an alternative of greater cogency (see Kuhn 1962). In this case, the foregoing conceptualisation is secularism, which went hand in hand with Modernism; it is now slowly being replaced (or amended or supplemented; see Hashemi 2017) by a more realistic, emergent conceptualisation of the world called post-secularism (identified most influentially by Habermas 2010; see Staudig and Alvis 2016:589). Within this internationally dawning altered sense of the relationship between the physical and the metaphysical, religion ought not to be publicly privileged, as occurred in extra-Modern (or a-Modern, i.e., before and around the Modernist cultural stream) societies, but neither should it be publicly disadvantaged *a priori*, as has been observed in Modernist societies with their inherent secularist reflexes. Rather, taking a more balanced approach (though perfect balance cannot be expected), faith is regarded as a normal part of life like any other – food, sport, art, dancing and so on. Along with this realisation comes also the insight that the relationship between religion and government must be "normalised" too. Religion is no longer a special case, worthy of more special attention from the state apparatus than other parts of life achieve. In this specific sense, religion is nothing special.

In this kind of socio-political-religio-cultural ambience, the *conceptual placement of atheism*, i.e. within post-secularism, changes too. To be sure, unbelief is not now marginalised or eradicated. Rather, the position afforded atheism in the social imaginary of intangible hierarchies is, in a sense, democratised. Atheism is taken off its throne and no longer holds the status of somehow being elevated above religions and authorised to make evaluative judgments about religions. Rather, atheism "is as much a position of faith on faith as any other" (from the Lombaard 2022 quote above). In the social circle of religious possibilities, atheism is one of a range of other religious possibilities, all relatively equally interlinked. Unbelief is now conceptually located amongst the religious choices, not beyond the religious. It holds no special evaluative status; just like any other faith orientation, atheism holds certain precepts dearly, relates to the world in specific ways, allows and forbids certain actions and views, and promotes a certain language and concepts. Atheism is, in this sense, not unbelief but simply yet another belief (or set of beliefs; cf. Gray 2018) – one with ancient roots and modern concerns, with adherents (such as The Brights n.d.) and leaders and detractors, and which draws public curiosity (such as the three-part documentary series titled *Atheism: A Brief History of Disbelief*; BBC 2004) from time to time.

5. Summary execution

The practical implications from the above may be stated as follows. Atheism, also in its public expressions usually formulated under the terminologies of secularism, *laïcité* or separation between church and state, is not non-religious (or a-religious). Such atheism is as religious an orientation as any other faith orientation against which atheism may position itself. In law, public policy, economics and other spheres of life, therefore, the idea of being "religion-free" (in any of its terminologies) is to be regarded as nonsensical – analogous to speaking accent-free and equally as misleading as "sugar-free" sweeteners that then turn out not to be healthier alternatives. The nomenclature of these terminologies parallels the branding of commercial products meant subtly to misrepresent the product's nature, albeit within the limits permitted by applicable regulations. Such branding does not reflect reality; rather, it craftily deflects attention and re-presents reality.

The conceptual move by modernity, in which it has conceived the possibility of living fully unattached to religion, is phenomenologically as false as the similar assertions about its parallel ideas/ideals on objectivity in journalism or in the pursuit of science. These ideas were articulated and held with honourable motives, but they could not be upheld, either in practice or in logic. The self-understanding of these confessions was mistaken and misguided, even if with noble intent. In law, public policy, economics and other spheres of life, therefore, the now-usual alternative to

a religion or to religions simply cannot be stated other than as a confession of, for instance, affirming atheism in public policy. This public atheism would then become the religious orientation of a society – phenomenologically speaking fully viable and of course as acceptable as any other, but no less confessionally loaded than that of any other religion. The underlying idea of privileging public atheism, such as by means of law, must be altered in terminology and argumentation so as to reflect the acknowledgement that this particular religious orientation is preferred.

Clearly, in just societies, all religious orientations found in that society would be reflected in such terminology and argumentation. How to do this is a practical exploration for a future article. However, the post-secular conceptual placement of atheism would then be expressed as a more realist, and hence more honest, alternative to that claimed by the secular conceptual placement of atheism.

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Towards an index on policies on and attitudes towards propagation of religion or belief

Testing the Religion and State Dataset (Round 3) on BRICS+ countries

Christof Sauer[1]

Abstract

Propagating faith is a fundamental element of freedom of religion or belief. The datasets of the Religion and State (RAS) Project at Bar-Ilan University include variables across states related to propagation of faith and conversion. They cover religious discrimination against minority religions; regulation of and restrictions on the religious practice of majority religion or all religions; explicit legislative limitations; explicit constitutional protection or limitation; and societal discrimination, harassment, acts of prejudice and violence against proselytising by minority religions. This study explores the feasibility of an index on government policies regarding propagation of religion or belief and societal attitudes and behaviours in that regard. Therefore, as a pilot study, data from the Religion and State Dataset (Round 3) on the member states of the intergovernmental organisation of major emerging economies known as BRICS+ are examined and formulas are proposed to calculate index scores.

Keywords

Propagation of religion, proselytism, mission, conversion, religion and state, BRICS.

1. Introduction

Propagating religion or belief in a non-coercive way is a fundamental element of freedom of religion or belief, thought and conscience and also intersects with

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freedom of speech and freedom of assembly. It may also be called proselytism or mission and is mirrored by the responsive act, by recipients of a religious message, of changing one's faith.

Propagating one's faith can be subsumed under different facets of freedom of religion or belief (FoRB).[2] One aspect is the freedom to *teach* a belief. This also forms part of the *manifestation* of belief and thus belongs to the *forum externum*. While the right to conversion enjoys absolute protection under human rights standards as part of the *forum internum*, manifestations of belief may possibly be limited under very clearly defined and narrow circumstances, despite their general eligibility for protection. Thus, whereas (from the perspective of a sociological interest in "propagation friendliness, neutrality or hostility" by government or society) propagation and conversion can be viewed together, any interpretation of data intended to identify human rights violations should clearly differentiate between matters of conversion and propagation (cf. Bielefeldt et al. 2016: 63-66).

As this study covers both government policies and societal hostility or friendliness towards propagation of beliefs, the title of the study combines references to "policies" and "attitudes." However, the use of the term "attitudes" does not imply that the data are based on attitudinal surveys (see the Research Design section).

Three methods of propagating one's belief should be distinguished: through birth and family relations, by choice and by force (cf. Sauer 2025: 95). First, what Western philosophy has called religion is most often perpetuated by tradition, as children are assumed to be born into the faith of their parents. The parents pass on their faith to their children by example, teaching and induction into rites. Such parental rights are also specifically protected by FoRB. Second, propagation of religion by choice covers communication by adherents to non-adherents, inviting those not born into a particular religion to consider the truth claims of this religion and to join its flock. Some religions claim not to practice proselytism in this sense, and others even keep their precepts secret from non-members or forbid others to join them. Nevertheless, most religious groups, or at least some sub-groups within those religions, do seek to gain new adherents in some way. Third, propagation of religion by force happens when a powerful agent compels non-adherents to adopt a religion (or to revert to it after converting from it). This has happened in history most often by military conquest, where those conquered were forced to adopt the conquerors' religion. But other types of coercion and compulsion also fall into this category.

2 As FoRB encompasses both religious and non-religious beliefs, for the sake of brevity, this essay will summarily address them collectively as beliefs or worldviews.

Only the first two types of propagation (by tradition or mission) are protected by FoRB, whereas the third type (by force) and any coercive variants of proselytism are considered a violation of FoRB.

I will look mainly at the second type, propagation by offering a choice, or what is often called proselytism or mission, both understood as neutral terms. But we will also encounter the coercive type or variants of propagation of belief.

This study explores the feasibility of creating an index on government policies on propagation of religion or belief and on societal attitudes and behaviours in that regard. As a pilot study, selected data from the Religion and State Dataset (RAS Round 3) are applied to a manageable and sufficiently diverse sample of countries. As this research was first conducted for presentation at a conference in South Africa, it seemed desirable to select an entity to which South Africa belongs. Thus, the 11 countries used are the members of the intergovernmental organisation of major emerging economies known as BRICS+.[3]

In the next section, I explain the research design. After that, applicable RAS3 data are examined, cluster by cluster, focusing on data that can potentially make operational contributions to the desired index. Formulas are proposed to arrive at unified country scores, combining results from question clusters, and the results are discussed. Eventually, a method is proposed to combine selected sub-scores so as to generate a government anti-proselytism score, a social anti-proselytism score, and an overall country score. I discuss the results and draw conclusions, while also pointing out limitations of the proposed approach.

2. Research design

The datasets of the RAS Project at Bar-Ilan University (ras.thearda.com) are in my assessment (Sauer 2025:96-97) the most comprehensive tools that include measures related to propagation of faith and conversion across states and religious groups.[4] They cover religious discrimination against minority religions; regula-

3 The original explorations also included a second set of 16 countries, namely the Southern African Development Community. However, only a few of these countries had any scores above zero for the various variables. For the sake of brevity, therefore, these countries are not discussed in this article. BRICS is an acronym for Brazil, Russia, India, China, and South Africa. BRICS+ is an informal name used to acknowledge the expansion of BRICS beyond its original five members (https://bricscooperation.com/bricsglossary). Its current members additionally comprise Saudi Arabia, Egypt, Ethiopia, Iran, the United Arab Emirates (UAE), and Indonesia (https://bricscooperation.com/brics).

4 According to the International Institute for Religious Freedom (IIRF), "The RAS Project has been used in over 250 peer-reviewed publications including books, academic articles, doctoral dissertations and MA theses and is the most used database on religious freedom and religion-state relations in academic writings." See IIRF, "Global Religious Freedom Index" (https://tinyurl.com/52rrkpvd). In a prior related project I have developed a "mission hostility index" focused on Christian propagation with data from the World Watch List (Sauer 2025).

tion of and restrictions on the practice of the majority religion or all religions; explicit legislative limitations; explicit constitutional protections or limitations; and societal discrimination, harassment, acts of prejudice and violence against proselytising by minority religions.

Since 2003, several new rounds of data coding have been pursued. The latest accessible dataset at the time of writing is the third round, published in 2017 and containing data from 1990 to 2014.[5] The methodology of the RAS3 dataset entails first the composition of a non-public summary report on each country based on all available sources, followed by completion of a code-sheet to arrive at numerical codes.

> The sources include (1) government and intergovernment reports on human rights and religious freedom, including reports and other information from sources such as the UN, the EU, and the US State Department; (2) reports by nongovernmental human rights organizations such as Amnesty International, Human Rights without Frontiers, and Forum 18; (3) news articles primarily taken from the Lexis/Nexis database, but also from other sources; (4) relevant academic articles and books; (5) primary sources such as laws and constitutions; and (6) an internet search for relevant sources (Fox 2022: 15).

Although the most recent round of data ends with the year 2014, it is still worth using and not necessarily outdated, as government restrictions remain relatively stable. Thus, the main data analysed come from the RAS3 for the year 2014, complemented by the RAS Constitutions Dataset for 2022.[6]

The RAS3 dataset contains about 30 indicators or variables pertaining to proselytism and/or conversion.[7] Related items are already grouped, and the grouping is retained in this analysis, but I prioritise the topic of proselytism and differentiate it from conversion-related issues. Unfortunately, the key terms in the RAS3 project are not defined any further beyond the questions in the codebooks.

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5 Currently, the RAS4 update is underway and will include data through 2023. It is not yet publicly available. However, analysis of regional data has been published in the Global Religious Freedom Index, an initiative of the IIRF, since my initial analysis for the present paper (see Petri and Fox 2023; Petri et al. 2025a, 2025b; https://iirf.global/publications-resources/global-religious-freedom-index/).

6 It is important to emphasise that the main RAS3 codings focus on the relationship between religion and the state apparatus. For a variable to be coded, there must either be a law or a consistent government practice. In cases where law and practice contradict each other, consistent government practice was coded. If a majority of local or regional governments engage in a practice, this variable is also coded.

7 The exact count depends on the assessment of which variables are sufficiently specific and how narrowly the concepts of propagation and conversion are delimited.

The research question driving this study is, whether an index can be effectively developed, based on the RAS Round 3 dataset, to compare governments' policies regarding propagation of religion or belief and societal attitudes and behaviours related to such propagation. The implicit sub-question is what formulas may be suitable for processing the data.

Of the 11 countries examined, South Africa scores 0 on all indicators, with only Brazil coming close to similar results. These scores mean either that all is well at the national level in those countries or that the sources and measures used are not sufficiently sensitive or comprehensive.

In the following discussion, I examine the RAS3 data, cluster by cluster, for their potential contributions to answering the research question. After that, I filter out the variables most suitable for constructing an index. The first cluster of variables deals with government restrictions and measures against minority religions relating to propagation of belief and conversion, including the promotion of majority beliefs among minorities.

3. Government restrictions against minority religions

Because the intensity of restrictions can vary, each item in this and the following categories is coded by the RAS3 methodology on a scale of 0 to 3:

> 0 = Not significantly restricted for any, or the government does not engage in this practice.
> 1 = The activity is slightly restricted, or the government engages in a mild form of this practice for some minorities.
> 2 = The activity is slightly restricted for most or all minorities, the government engages in a mild form of this practice, or the activity is sharply restricted for some of them or the government engages in a severe form of this activity for some of them [only].
> 3 = The activity is prohibited or sharply restricted, or the government engages in a severe form of this activity for most or all minorities.[8]

To achieve some degree of comparability, my own calculated scores are all adjusted to a scale of 0-10 by multiplication with the respective adjustment factor.

I first address restrictions placed on proselytisers as persons. Then I consider limits on the means of propagation, namely religious publications and symbols. Third, I consider restrictions on conversion versus propagation of

8 This and all the following definitions of codes are copied verbatim from the RAS3 Codebook (Fox 2017b), and therefore the American spelling is maintained.

the majority worldview, before comparing the above cumulative government restriction scores.

3.1. Restrictions on proselytisers discriminating against minority religions

Three codes in the RAS3 dataset cover restrictions on proselytisers[9] who are members of minority religions. The codes differentiate the proselytisers by permanent residents and foreigners, and their addressees by majority or minority religions:

> mx25: Restrictions on proselytizing by permanent residents of state to members of the *majority* religion.
> mx26: Restrictions on proselytizing by permanent residents of state to members of *minority* religions.
> mx27: Restrictions on proselytizing by *foreign clergy or missionaries*. (This includes denial of visas if it is specifically aimed at missionaries but not if it is the same type applicable to any foreigner.)

In Table 1, I have simply added the scores given for these codes in the RAS3 data to a total score (abbreviated "pros-min" for proselytising by minorities), adjusted to a scale of 0 to 10. The maximum of 10 points signifies total prohibition or the sharpest form of restriction for many or most of the minorities.

Brazil received 1 point for a mild form of restrictions on proselytising by permanent residents of state to members of minority religions. Russia accumulated 3 points for slight restrictions in all three categories. India (4 points) drastically seeks to curtail activities of foreign missionaries so as to curb the spread of minority religions such as Christianity and Islam. However, the Indian government does not restrict proselytism among these and other minorities.

China received the highest score among the original five BRICS countries; however, the new BRICS+ members worsen the average score. The Muslim-majority countries score high on restricting or banning proselytism within the majority religion, while usually permitting it among the minority religions. Indonesia and Iran received the maximum possible score.

From this sample of countries,[10] it appears that governments hostile to "proselytising by permanent residents to members of the majority religion" (code mx25) are at least as hostile or more so to such action by foreign missionaries or clergy

9 Whereas this paper uses the neutral term "propagation of faith" in its title, the RAS3 code sheet uses "proselytism" and its derivatives.
10 As South Africa scores 0 points on all measures examined here, it is excluded from the tables for simplicity.

Table 1: Restrictions on proselytisers from minorities

	permanent residents		foreign missionaries	
country	**to majority** mx25	**to minority** mx26	mx27	**pros-min**
Brazil	0	1	0	1.1
Ethiopia	0	0	2	2.2
Russia	1	1	1	3.3
India	1	0	3	4.4
Egypt	2	0	2	4.4
Saudi Arabia	3	0	3	**6.7**
UAE	3	0	3	**6.7**
China	2	2	3	**7.8**
Indonesia	3	3	3	**10**
Iran	3	3	3	**10**
Average	1.8	1	2.3	5.7

pros-min = restrictions on proselytisers from minorities

shading	score	descriptor
	0.1-3.3	moderate
	3.34-6.66	strong
	6.67-10	severe

(code mx27). Some states, such as Ethiopia, oppose activity by foreign missionaries but do not seek to prevent proselytising by permanent residents.

3.2. Comparing restrictions on means of propagation by minorities

Different from the prior examination of restrictions placed on proselytisers as persons, the following three restrictions all have to do with potential means of propagation, namely religious publications and symbols. However, the codes do not pertain exclusively to propagation of religion; rather, they could also cover simply maintaining and manifesting a non-proselytising religious adherence. Nevertheless, from the perspective of a government, all these behaviours might be considered means of propagation or proselytising. In RAS3 the relevant codes are grouped in the category of "other restrictions of religious practice of minorities." They can be helpful in assessing countries that have the restrictions described in Table 1 above.

For the sake of comparison, the three relevant codes, shown in Table 2 and discussed below, are bundled into a cumulative score, which is adjusted to a scale of 0 to 10.[11]

11 The formula is ((mx07+mx08)/2+mx12)/2 = Score.

Table 2: Restrictions of means of propagation

	publish	import	symbols	comulatve scores	
country	**mx07**	**mx08**	**mx12**	**pros-means-min**	**pros-min**
Brazil	0	0	0	0.00	1.11
India	0	0	0	0.00	4.44
Ethiopia	0	0	1	1.67	2.22
Egypt	1	1	0	1.67	4.44
UAE	1	1	0	1.67	6.67
Indonesia	1	0	0	0.83	10.00
Iran	2	2	0	3.33	10.00
Russia	3	2	1	5.83	3.33
China	2	2	2	6.67	7.78
Saudi Arabia	3	3	3	10.00	6.67
Average	1.1	1.0	0.5	2.63	4.70

pros-means-min = restrictions on means of proselytism
pros-min = restrictions on proselytisers from minorities (from Table 1)

Among the 11 countries examined, restrictions on writing, publishing, disseminating or importing religious publications or on wearing of religious clothing or symbols are found in eight countries, but not in Brazil and India, both of which have restrictions on proselytisers (cf. Table 1). Accordingly, it appears that restrictions on the means of proselytism are not the policy most frequently employed by governments to limit such behaviour. Rather, they are usually additional restrictions employed by some governments on top of the more usual ones discussed in section 3.1 above.

A related pair of restrictions are prevalent and intense in four countries: "Restrictions on the ability to write, publish, or disseminate religious publications" (mx07), and "Restrictions on the ability to import religious publications" (mx08). All affected countries score the same on both measures, except for two. Therefore, these twin variables are amalgamated and their average is used when calculating country scores on restrictions of means of propagation.

The third measure, "Restrictions on the wearing of religious symbols or clothing" (mx12),[12] is reported as prevalent in four countries, and their average intensity across all countries is only half as strong as that for the publication-related codes.

When comparing the country scores for restrictions on means of propagation by minorities with the scores for restrictions on proselytisers from religious minorities, the following can be observed: First, restrictions on proselytisers ap-

12 This includes presence or absence of facial hair but does not include weapons or clothing that covers one's face.

pear more prevalent and more severe than those on the means of propagation. Second, those countries that place more severe restrictions on proselytisers are more likely also to place more severe restrictions on the means used. Those countries with less severe restrictions on the proselytisers are likely to have no or less severe restrictions on the means of propagation.

3.3. Measures regarding conversion, discriminating against minority religions

I understand conversion as a voluntary change of religious belief or affiliation by an individual or group, including the adoption of or departure from non-religious worldviews. In some contexts, however, adherents of the majority worldview mainly understand conversion as a manipulative or coercive act by a proselytiser done to a (helpless) victim.

The RAS3 dataset includes four[13] relevant codes regarding conversions, converts and converting:

> mx21: Restrictions on conversion to minority religions.
> mx22: Forced renunciation of faith by recent converts to minority religions.
> mx23: Forced conversions of people who were never members of the majority religion.
> mx24: Efforts or campaigns to convert members of minority religions to the majority religion which do not use force.

Table 3: Conversion to minorities and majority propagation

country	conv-host	pro-maj	mx21	mx22	mx23	mx24
Indonesia	0	2	0	0	1	1
China	0	2	0	0	0	2
UAE	3	1	3	0	0	1
Egypt	4	2	3	1	1	1
India	4	3	2	2	1	2
Saudi Arabia	5	3	3	2	1	2
Iran	6	4	3	3	2	2
Average	3.1	2.0	2.1	1.0	0.8	1.3

conv-host = government hostility to conversion to minority religions
pro-maj = government propagation of the majority religion

13 There is a very high correlation between lx18, "Restrictions on conversions away from the dominant religion" [in legislation] and mx21, "Restrictions on conversion to minority religions." Therefore, only the latter will be included in the analysis, as its coding of answers is more differentiated regarding intensity and scope.

In the pursuit of a conversion friendliness or hostility score, these four codes (mx21-24) should not be simply lumped together, as the first two restrict conversion towards minority religions while the last two are measures of government being an agent of proselytism and propagating the majority worldview. From the perspective of a government, the two pairs of issues might simply be two sides of the same coin, emanating from the same logic. From the perspective of establishing a propagation friendliness or hostility index, however, the two pairs of issues have to be kept apart. One could use mx21+22 to establish a "conversion hostility score" for governments pertaining to conversions to minority religions, while using mx23+24 to establish a "majority religion proselytism friendliness score." Both types of activities discriminate against minority religions but in opposite ways: one approach prevents the minority from growing by conversions, and the other seeks to reduce the minority's size by inducing conversions away from it.

All the states in this sample that restrict conversion also propagate the majority worldview (see Table 3). Most countries that propagate the majority worldview also restrict conversion, with the exception of China.

3.4. Comparing four cumulative government restriction scores

Looking at the four different groups of measures examined so far (including the two different types of measures I have distinguished in Table 3), restrictions of minority proselytisers and their means of propagation are the purest measure of

Table 4: Comparing four scores: minority proselytisers, means of proselytism, conversion hostility and majority propagation

country	pros-min	pros-mean-min	conv-host	pro-maj
Brazil	1.11	0	0	0
Ethiopia	2.22	1.67	0	0
Russia	3.33	5.83	0	0
UAE	6.67	1.67	5	1.67
Indonesia	10	0.83	0	3.33
India	4.44	0	6.67	5
Egypt	4.44	1.67	6.67	3.33
China	7.78	6.67	0	3.33
Saudi Arabia	6.67	10.00	8.33	5
Iran	10	3.33	10	6.67
Average	5.7	3.2	3.7	2.8

pros-min = restrictions on proselytisers from minorities
pros-means-min = restrictions of means of proselytism by minority religions
conv-host = government hostility to conversion to minority religions
pro-maj = government propagation of the majority religion

state neutrality towards propagation of faith. However, it is also useful to compare these states regarding hostility towards conversion to minority religions and government propagation of the majority worldview.

In Table 4, the countries are provisionally ordered according to their totals with respect to the four different scores. There are various combinations of scores, representing different contextual scenarios. Most often, conversion hostility and majority-religion propagation by governments occur only in a context of restrictions of minority-religion proselytism, but in some cases, hostility against minority-religion proselytism remains isolated.

4. Comparison to restrictions on religious practices of the majority religion or all religions

Whereas the previous section has dealt with minority religions, the next set of variables addresses whether the state regulates either all religions or the majority religion regarding any aspects that appear more specifically linked to propagation of religion. According to the RAS3 Codebook (Fox 2017b), "This is qualitatively different from restrictions on minority religions because it indicates a fear, hatred, or suspicion of religion in general rather than this type of attitude toward minority religions." From the 29 types of restrictions on the majority religion or all religions that RAS3 distinguishes, four appear to be particularly influential on propagation of religion; these four are related to activities and gatherings, their location, written material, and display of symbols. In the RAS3 Codebook, the 29 types of restrictions cover the majority of aspects in the cluster of restrictions related to "Religious Practices," whereas none are from the groups "Restrictions on Religion's Political Role," "Restrictions on Religious Institutions" or "Other Regulation of Religion."[14]

These variables are also coded on a scale of 0 to 3:

> 3 = The activity is illegal or the government engages in this activity often and on a large scale.
> 2 = Significant restrictions including practical restrictions or the government engages in this activity occasionally and on a moderate scale.
> 1 = Slight restrictions including practical restrictions or the government engages in this activity rarely and on a small scale.
> 0 = No restrictions.

14 Some of the other restrictions listed there have the potential to also limit propagation of religion but are not exclusively limited to this purpose. Thus, they are not considered here due to their insufficient specificity. Examples include restrictions on public religious speech or religious hate speech, along with restrictions on access to places of worship or a requirement for foreign religious organisations to have a local sponsor or affiliation.

Table 5: Comparison to restrictions on major or all religions

	inside only	publications	gatherings	symbols		
country	nx16	nx17	nx19	nx20	**anti-maj**	**pros-min**
Brazil	0	0	0	0	0.0	1.1
Ethiopia	0	0	0	0	0.0	2.2
Russia	0	0	0	0	0.0	3.3
India	0	0	0	0	0.0	4.4
Saudi Arabia	0	0	0	0	0.0	6.7
UAE	0	0	0	0	0.0	6.7
Iran	0	0	0	0	0.0	10.0
Indonesia	0	1	0	0	1.1	10.0
Egypt	2	0	0	0	1.7	4.4
China	3	2	0	0	4.2	7.8

anti-maj/all = restrictions on major or all religions affecting proselytism
pros-min = restrictions on proselytisers from minorities

Table 5 presents the results for all BRICS+ countries that previously scored higher than 0 for restrictions on minority proselytism (in Tables 1 and 2).

Overall, there was very scarce evidence of any such regulations or restrictions affecting the majority religion or all religions. They were identified in only three of the countries for one of the markers, with one of these countries also scoring on one additional marker.

None of the countries received any points for "restrictions on the public display by private persons or organizations of religious symbols, including (but not limited to) religious dress, the presence or absence of facial hair, [or] nativity scenes/icons" (nx20) regarding majority religions. This puts the restrictions imposed on minority religions examined above (mx12) by four governments in starker contrast. Another variable for which none of the sample countries scored is "Restrictions on religious public gatherings that are not placed on other types of public gathering" (nx19).

"Restrictions on the publication or dissemination of written religious material" (nx17) by all religions were registered in China and Indonesia only. A comparable marker for minority religions (mx07) registered such restrictions in seven states.

"Restrictions on religious activities outside of recognized religious facilities" (nx16) were exercised by two states, Egypt and China. In China, restriction of proselytism appears to be part of a general suspicion of religion. In India, which does not score on nx16, the restriction of proselytism localities appears clearly limited to minority religions. Thus, nx16 is an example of a marker that can measure restricting effects on proselytism, even though it appears to cover more than proselytism only.

5. Other government related variables not found useful for an index

Two further clusters of variables in RAS3 data contain codes of material interest regarding the intersection of government and propagation of belief. They concern (1) constitutional anchoring or protection of propagation or conversion and (2) bans on coercion, on one hand, and variations in limits on proselytising on the other hand. However, as shown below, these variables were found to be not the best for operationalising in an index.

Beneath the layer of national laws and actual practice of states lie their constitutions. Two types of clauses are relevant here. First, some constitutions explicitly mention religious freedom in terms of the right to change one's religion[15] or to propagate a religion.[16] Second, some constitutions contain a clause that expresses protection of religious freedom, such as a ban on the use of compulsion to convert or to prevent conversion.[17]

The source for these markers is the RAS Constitutions Dataset for 2022, which coded all religion clauses in constitutions of countries with a population of at least 250,000.[18] This dataset is complementary to the RAS3 dataset used above. The coding is binary, simply stating whether such a clause exists or not.

When the constitutional data were compiled and compared to the practice of those countries as measured above, it was found that positive mentions of protections in constitutions are no reliable measure of actual freedom. Therefore, they should not be included in a comparative index regarding policies on this matter and related grass-roots realities.

Another set of variables that caught my interest was "Variations in limits on proselytising." Twelve variables are used to capture specific policies limiting proselytising and missionaries.[19] The three most drastic ones do not apply to this sample.[20] The variations are differentiated by the legality or illegality of proselytism, as well as types of restrictions on proselytisers, the opponents of proselytism and the localities of proselytism. When one looks at the scores, it quickly

15 *cfreetypeo3x*: Freedom to change one's religion. Prevalent in 27 constitutions of 176 examined.
16 *cfreetypeo8x*: The right to propagate or spread a religion. Prevalent in 23 constitutions of 176 examined.
17 *cfreeı6x*: Ban on the use of physical or moral compulsion to force someone to convert or prevent them from converting. Prevalent in 8 constitutions of 176 examined. By contrast, another constitutional reference to conversion is not considered here: "cotherı7x: Ban on conversion away from the majority religion," as this violates FoRB rather than protecting it. The only constitution containing such a clause as of 2022 was that of Mauritania. The complete Religion and State Constitutions Codebook (as of 4 April 2023) was scrutinised for this study.
18 Western countries with lower populations are also included.
19 The codes bear the exact names vproselyo1x to vprosely12x, of which only the numbering is reproduced here.
20 These three are as follows: (#1) Proselytizing by all religions is illegal and is not allowed in practice. (If this category is coded, the other categories should not be coded.) (#2) Proselytizing is illegal but is sometimes allowed in practice. (#12) Practical or legal restrictions on proselytizing by all members of the majority religion.

becomes evident that the sum of varieties per country is not directly correlated with the intensity of restrictions on minority proselytism.

These variables are indeed helpful for qualitatively describing the variety and number of limits imposed on proselytism; however, they do not easily serve as components of an index on policies or attitudes on propagation of faith. There are several obstacles to using them for any cumulative score. They cannot be easily combined with any of the other scores, as they are binary only, not rating severity or prevalence. Some of them are mutually exclusive, and they contain many different variables. Thus, it is not easy to arrange them convincingly on a scale of severity. Therefore, I refrain here from using the data on constitutions or on varieties of limits on proselytising.

6. Calculating a government score regarding propagation of religion

We have now reviewed all the RAS3 variables relevant to government behaviour. Which sub-scores should be used for a "government score on restrictions of propagation of religion"? The guiding perspective must be the effect on those suffering limitations and restrictions. If in doubt, the minority perspective, representing the weaker party, should take precedence.

From the examinations conducted above, it appears appropriate to attempt to combine the following scores:

1) pros-min: restrictions on proselytisers from minority religions
2) pros-min-means: restrictions of means of proselytism by minority religions
3) anti-maj/all: restrictions on propagation by majority religions or all religions

But how should they be combined? Should one choose (a) addition; (b) using the maximum score; (c) a combination of (a) and (b); (d) using different weighing for sub-scores, particularly for variable groups 2 and 3; or (e) using certain scores alternatively, depending on the country scenario?

After experimenting with the additional inclusion of a further score (pro-maj) and various ways of combining the scores (maximum, average, average of all above 0, average of the previous three) and after assessing their respective advantages and disadvantages, I decided on a manual expert evaluation based on a bundle of rules and formulas, as all the simpler options did not prove satisfactory.

Two cumulative scores are created (Table 6): an anti-minority proselytism (anti-min) score and a government score for policies on propagation of religion (gov-score).

The *anti-min score* is composed of the pros-min score (restrictions of proselytisers from minority religions) plus one-third of the pros-means-min score

Table 6: Scores on government policies countering minority proselytism and propagation of religion in general

country	gov-score	anti-min	pros-min	pros-means-min	anti-maj/all
Ethiopia	2.8	2.78	2.22	1.67	0
India	4.4	4.44	4.44	0	0
Egypt	5.0	5.00	4.44	1.67	2.22
Russia	5.3	5.27	3.33	5.83	0
UAE	7.2	7.22	6.66	1.67	0
Indonesia	10.0	10.00	10	0.83	0
Saudi Arabia	10.0	9.99	6.66	10.00	0
Iran	10.0	10.00	10	3.33	0
China	10.0	10.00	7.78	6.67	5.56
Average	6.6	6.6	5.7	3.2	0.9

gov-score = consolidated government score on policies on propagation of religion
anti-min = combined anti-minority proselytism score
pros-min = restrictions on proselytisers from minority religions
pros-means-min = restrictions of means of proselytism by minority religions
anti-maj/all = restrictions on propagation by majority religions or all religions

(restrictions on means of proselytism by minorities). The rationale for this formula is that the pros-min score is the score on which the greatest number of countries is above 0 and can be considered a base score. The restrictions on means of proselytism can be considered as having an additional effect in restricting proselytism, but this effect is overlapping. Therefore, these items are weighted less heavily. Averaging would deny the severe effect of the pros-min score; simply adding the two would raise the scores above 10 in too many cases.

For the *gov-score,* the higher one between the anti-minority-proselytism score and the anti-majority-propagation score is used. The rationale is that minorities are more vulnerable. Usually their score is higher, and in that case restrictions of the majority or all do add to their lot. Therefore, the scores are not added or averaged. If all religions are restricted, then minorities are equally affected. I am not aware of cases where only majority religions are restricted and minorities are not.

All cumulative scores are capped at 10. Where the strict application of purely mathematical logic would result in a score above 10, the different factors are considered to increasingly overlap.

Thus, at the low end of the scale, in the case of some countries outside of this sample, the gov-score would equal the anti-maj/all score. At the high end of the scale, cumulative scores are capped for Indonesia, Iran and China.

Overall, the sample countries are evenly spread on the scale of 0 to 10 (South Africa and Brazil both score 0 and are not included in Table 6) and can be grouped into three blocks, tentatively designated as having moderate, strong or severe government restrictions on propagation of religion.

Having established a formula for a government score relating to propagation of religion, I now turn to societal discrimination, on which RAS3 data also contain a module.

7. Societal attitudes and behaviour towards proselytising and conversion

Unlike the other scores that pertained to governments, this section focuses on actions taken by societal actors. It primarily measures attitudes and discrimination towards minority religions from "non-governmental groups, entities, and individuals in society." This adds an important dimension, as registering only governmental discrimination and restrictions would miss part of the picture. This data module offers two relevant bundles of measures; one focuses on "societal regulation of religion" (or more precisely social hostility) and measures attitudes, while the other focuses on societal discrimination and measures actual action.

7.1. Negative or hostile attitudes

The category "Societal regulation of religion … replicates the original Grim & Finke SRI Index. It refers to attitudes against members of minority religions in a state by members of the majority religion" (cf. Grim & Finke 2012). The two attitudes of interest here are those toward proselytising (wsocreg03x) and those toward conversion to other religions (wsocreg02x). The coding follows this scale:

> 3 = Hostile against most or all minority religions
> 2 = Negative but not hostile against all minority religions or hostile against some but not most minority religions
> 1 = Negative but not hostile against some minority religions
> 0 = None

Generalised negative attitudes by adherents of a majority religion towards proselytising or conversion (Table 7) are registered in eight of the 11 countries in this sample, with proselytism being popularly detested in a similar number of countries as conversion to a minority religion. Most often negative attitudes affect both phenomena similarly, and the pairs always score the same in this case. The countries that score on only one of the measures are Russia regarding proselytism and China regarding conversion.

Table 7: Social attitudes and discrimination of proselytism or conversion

	ATTITUDES		att_score	dis_score	DISCRIMINATION/VIOLENCE		
country	**att_pros** WSOCRE G03	**att_conv** WSOCRE G02			**dis_pros** WSOCDI S14	**dis_conv** WSOCDI S15	**viol_p+c** WSOCDI S21
China	0	1	1.7	0	0	0	0
Ethiopia	1	1	3.3	0	0	0	0
UAE	1	1	3.3	0.7	0	1	0
Russia	2	0	3.3	2	0	0	1
Indonesia	2	2	6.7	0	0	0	0
India	2	2	6.7	4.7	1	0	2
Iran	3	3	10	0	0	0	0
Saudi Arabia	3	3	10	0	0	0	0
Egypt	3	3	10	6	0	3	2

att_pros = attitudes toward proselytizing
att_conv = attitudes toward conversion to other religions
att_score = sum of attitude scores (scaled to 1-10)
dis_score = aggregated discrimination/violence score (scaled to 1-10)
dis_pros = harassment of proselytizers which does not reach the level of violence. This includes "verbal attacks."
dis_conv = harassment of converts away from the majority religion which does not reach the level of violence. This includes "verbal attacks."
viol_p+c = physical violence targeted specifically against proselytizers or people who converted away from the majority religion
NB: These are the original definitions of the variables in RAS3

7.2. Discriminatory or violent action

This category (also covered in Table 7) refers to actions taken against members of minority religions in a state by non-government actors. Two codes register harassment of either proselytisers (wsocdis14x) or converts from the majority religion (wsocdis15x) that does not reach the level of violence. This includes "verbal attacks." Another code registers physical violence targeted specifically against proselytisers or converts (wsocdis21x). The scale is as follows:

> 3 = This action occurs on a substantial level to members of most or all minority religions.
> 2 = This action occurs on a substantial level to members [of] one or a few minorities but not most or on a minor level to all or most minorities.
> 1 = This action occurs on a minor level to one or a few minorities but not most.
> 0 = There are no reported incidents of this type of action against any minorities.

Seven of the 11 countries do not register negatively here, whereas four countries score points on various measures.

Harassment of minority proselytisers is reported only for India, whereas two countries have harassment of converts (UAE, Egypt) and three have specific violence against proselytisers or converts (Russia, India, Egypt). Generally, the scores are usually lower for actions than for attitudes. This can be expected, as not all negative or hostile attitudes translate into discriminatory or violent action.

7.3. Calculating a social hostility score on proselytising

Regarding potential contributions to a propagation friendliness or hostility index, one might argue that only measures for actions should be included but not measures for attitudes. Indeed, in the pursuit of a combined score, a threshold for the inclusion of markers needs to be determined. My reason for including attitudes as well as actions is that attitudes can be reflected in behaviours, such as body language or unfriendly glances, that may have a chilling effect on religious freedom. Not including attitudes would reduce the sensitivity of the score and thus would miss out on warnings of potential hazard.

In the pursuit of a purer "proselytism-related social hostility score" (Table 8), the conversion-related markers are excluded in combining the remaining markers. The formula combines "attitudes" (times 2/3), "discrimination" (times 1) and "violence" (times 5/3) on a scale of 0 to 10 (with the multiplication factors indicated in brackets). India and Egypt score highest in social hostility of members of the majority religion against proselytism by members of the minority religion.[21]

Thus, an overall score on societal attitudes and behaviours towards proselytising could be operationalised, composed of only three variables.

8. Combining scores to form an index

Following best practice, a propagation friendliness or hostility index should distinguish government and societal actors. Thus, the index must be composed of two sub-scores, representing these measures respectively.

The following observations can be made on how the government score and societal score relate to each other (Table 9). First, if both scores can be assumed to measure the same levels of severity, then social hostility is overall less severe in my sample than government restrictions. In most of the countries, government restrictions on proselytism appear more severe than social hostility against proselytism.

In China, the extreme case, the scores are 10 and 0, respectively, indicating severe government restrictions and no general social hostility towards proselytism.

21 A possible comparison excluded in this discussion is as follows: How do societal actions compare to government actions against proselytisers and converts, respectively, in those countries?

Table 8: Proselytism-related social hostility score

country	att_pros	dis_pros	viol_p+c	soc-score
	WSOCREG03	WSOCDIS14	WSOCDIS21	
China	0	0	0	0
Ethiopia	1	0	0	0.7
UAE	1	0	0	0.7
Indonesia	2	0	0	1.3
Iran	3	0	0	2
Saudi Arabia	3	0	0	2
Russia	2	0	1	3
Egypt	3	0	2	5.3
India	2	1	2	5.7

att_pros = attitudes toward proselytizing
dis_pros = harassment of proselytizers which does not reach the level of violence. This includes "verbal attacks."
viol_p+c = physical violence targeted specifically against proselytizers or people who converted away from the majority religion
soc-score = consolidated score on proselytism-related social hostility

In two countries, namely India and Egypt, social hostility appears higher than government restrictions.

How can the two scores regarding government and social barriers to proselytism be combined? Forming an average would seriously underrate government restrictions. Thus, adding the two scores, while capping the scale, appears to be the better option. One could argue that in a context where government restricts proselytism, social hostility makes it worse.

The sample could be divided into three groups. The first group, which scores low on both measures, consists of Brazil and South Africa. A second group is around the middle of the scale on either or both scores but is escalated into the category labelled as severe by the addition of scores (Russia, India and Egypt). For the third group, government restrictions are so severe that low scores for social hostility provide little relief.

The additive method has the result that an increasing number of countries move into the group labelled "severe" (8 of 10) or newly or again reach the capping of 10 points (Table 9).[22]

It can be debated whether it is legitimate to form this final combined score. Pew Research Center (2024) instead uses a scatter plot to indicate where the coun-

22 The capping is used as a means to keep the resulting score on a scale of 0-10.

Table 9: Government and Social anti-proselytism scores combined

country	gov+soc_comb	gov-score	soc-score
Ethiopia	3.5	2.8	0.7
UAE	7.9	7.2	0.7
Russia	8.3	5.3	3
China	10	10	0
Indonesia	10	10	1.3
India*	10	4.4	5.7
Egypt*	10	5	5.3
Saudi Arabia*	10	10	2
Iran*	10	10	2
Average	**6.4**	**5.3**	**1.5**

* = capped at 10
gov+soc_comb = combination of government score and social score
gov-score = consolidated government score on policies on propagation of religion
soc-score = consolidated score on proselytism related social hostility

tries fall regarding the two measures of government restrictions and social hostility. Table 10 presents such a scatter-plot presentation of the data of this research.

9. Conclusions

The purpose of this paper was to determine whether it is possible to construct a credible index, based on the RAS Round 3 Dataset, to compare countries on government policies regarding propagation of religion or belief and on societal attitudes and behaviours related to such propagation. I believe my work demonstrates that creating a useful index from these data is possible.

As already noted, South Africa is the only state in the BRICS+ sample that does not register negatively on any of the measures as of 2014. Among the 10 other countries, only Brazil came close to South Africa's clean slate. Saudi Arabia, Iran, China, and the United Arab Emirates have severe restrictions or violations of the freedom to propagate belief, combined with moderate levels of social hostility. India, Egypt and Russia form another group, where strong restrictions or violations are combined with strong social hostility. The cumulative impact of the two factors for these three countries is only slightly less than that for the four nations with severe government restrictions.

As I chose to focus narrowly on the issue of propagation of religious belief, the interpretation of the situation represented on the index of policies and attitudes towards propagation of belief could be complemented by indexes of policies and attitudes towards conversion, of active state propagation of certain religions or ideologies, and of propaganda against all or certain religions.

Table 10: Government restrictions / Social hostilities towards propagation of religion

Government restrictions >>> \ Social Hostilities >>>	0	1	2	3	4	5	6	7	8	9	10
10	China	Indonesia	Saudi A Iran								
9											
8											
7		UAE									
6											
5				Russia		Egypt					
4							India				
3		Ethiopia									
2											
1											
0	RSA Brazil										

This study has several limitations. On a material level, the data are over a decade old and some situations have changed in the meantime. For example, China, Russia and India have generally worsened on other FoRB measures (Aid to the Church in Need 2025). Another limitation is that the measurements assess the general situation on a national level or in the majority of regions of a state and thus do not always register phenomena that are regional only (Sauer 2022). Furthermore, a score of 0 could mean that the sources or measures used are not sensitive or comprehensive enough to register phenomena that do in fact exist. An incident-based approach, like that used in the IIRF Violent Incidents Database (Petri et al. 2025a, 2025b), could well bring to light some additional issues.

In addition, the depth of the information contained in the RAS3 data is limited. The dataset does not provide any explanations or accessible documentation as to why a particular country received a certain score on a particular measurement. When two alternative phenomena are combined to determine a score on a measurement, there is no information on which of the two applies.

One methodological challenge was the identification of appropriate codes to identify issues regarding propagation of belief. There are government restrictions that specifically target proselytism only. Other restrictions always affect freedom of proselytism and its enabling foundations while not targeting it specifically. Furthermore, there are broad markers that also affect proselytism but equally include other phenomena and are therefore not specific enough to compare policies and attitudes on propagation.

As a second methodological challenge, for my purposes, majority religions propagated, protected or privileged by the government fall into the same category as non-religious secular state ideologies. The RAS3 dataset, however, distinguishes them. Thus, government restrictions or violations of the freedom of propagation of belief in states propagating a non-religious secular ideology are covered by different questions from those involving a majority religion. This makes comparing states more complex.

All the composite scores are mine and not those of the RAS3 data. The formulas I used are a matter of careful weighting and contain numerous decisions among possible alternatives. Thus, the process might be more of an art than a science. The possible margin of error has not been calculated with statistical methods. Therefore, it is safest to focus mainly on clusters in the results (as shown by shading and scatter plot in Tables 9 and 10) and not to put much emphasis on minor differences in any scores.

It might be possible to get to a deeper level in the data or interpretation by considering additional questions that cover general anti-religious stances of governments, by using the minorities dataset of RAS, or by comparing the results with some general codes, such as whether a country has a state religion.

Despite such caveats, a first step has been made in establishing an index, based on the RAS Round 3 Dataset, that compares countries on government policies regarding propagation of religion or belief and on societal attitudes and behaviours related to such propagation. This formula could be tested on all countries in RAS3, to see if the outcome portrays a meaningful picture. As the RAS4 dataset is currently being processed, and as RAS4 contains additional variables and refinements, one would need to consider whether the approach proposed above would also work with the RAS4 dataset or if any amendments are needed.

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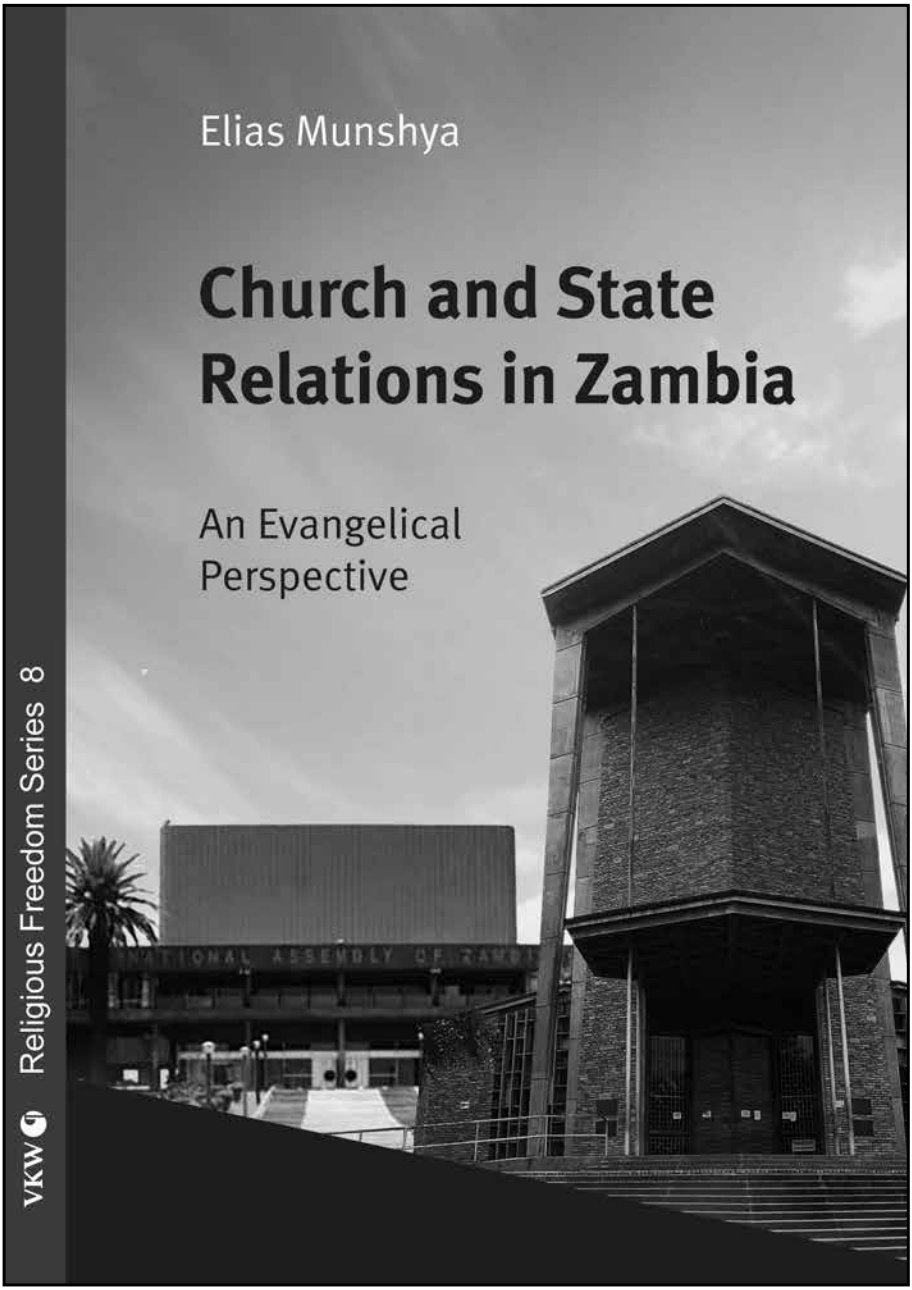

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Tracking religious freedom violations with the Violent Incidents Database

A methodological approach and comparative analysis

Dennis P. Petri, Kyle J. Wisdom and John T. Bainbridge[1]

Abstract

Measuring and comparing religious freedom across countries and over time requires reliable and valid data sources. Existing religious freedom datasets are either based on the coding of qualitative data (such as the Religion and State Project or the Pew Research Center), on expert opinions (V-Dem or the World Watch List) or on surveys (Anti-Defamation League). Each of these approaches has its strengths and limitations. In this study, we present the Violent Incidents Database (VID), a complementary tool designed to collect, record, and analyze violent incidents related to violations of religious freedom based on media reports and other public sources. We critically describe the criteria and process for selecting, coding and verifying the incidents, as well as the categories and indicators used to classify them. We also compare the VID with other existing religious freedom datasets and show how the VID provides a complementary picture of the nature and dynamics of religious freedom violations. We offer a preliminary analysis of the data collected through the end of 2024 with selected figures for data visualization. We conclude by discussing anticipated improvements for the VID as well as its potential applications for policy makers, advocates, and practitioners.

Keywords

Religious freedom measurement, Violent Incidents Database (VID), data collection and verification, comparative religious freedom datasets, policy and advocacy applications.

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1. Introduction

In 2011, Thomas Schirrmacher wrote an opinion article on the challenges of counting the number of Christian martyrs in which he concluded, "What we need is a database in which for any year we could enter all the known, larger cases [of religious persecution] so that at the end of the year we not only have a usable estimate, but rather a situation where given the list, everyone can investigate the estimate's resilience" (Schirrmacher 2012:41). This statement of need inspired the development of the Violent Incidents Database (VID), which collects, records and analyzes violent incidents concerning violations of religious freedom of all faiths, as input for both research and policy-influencing efforts. The VID is publicly accessible online at www.violentincidents.com.

At present, the VID is the only comprehensive data collection effort that systematically tracks religious freedom violations involving physical violence in its multiple dimensions with an event-based focus: individual and collective, state and non-state actors, religious and non-religious motivations, and in all spheres of life. The VID collects data concerning all faiths and, where possible, records the religious affiliation of both actor and victim. For example, in many incidents, Christians may be victims, but in others, they are the perpetrators. The VID also includes geographic information that allows for subnational analysis, which can surface important regional differences within a country.

Sadly, many civil society organizations working for justice in the field of religious freedom do little to collect comprehensive data. They are generally very good at discussing issues, raising awareness in the media and on social networks, diagnosing social situations, and making recommendations for public policy, but very few of them engage in the tedious, time-intensive, expensive, and sometimes dangerous task of documenting incidents. Nevertheless, effective political advocacy depends on objective, up-to-date, and reliable information, which often means documenting and counting incidents of religious freedom violations, which are a subset of human rights (Glasius et al. 2018).

In this study, we present the methodology of the Violent Incidents Database (VID) as a complementary tool designed to collect, record, and analyze violent incidents related to religious freedom violations based on media reports and other public sources. Our understanding of religious freedom or Freedom of Religion or Belief (FoRB) is based on Article 18 of the UDHR and the ICCPR.[2] We compare the VID with other existing religious freedom datasets and show how the VID provides a complementary picture of the nature and dynamics of religious freedom violations. We also critically describe the criteria and process for selecting,

2 The terms 'religious freedom' and 'Freedom of Religion or Belief' will be used interchangeably in this study.

coding, and verifying the incidents, as well as the categories and indicators used to classify them. We offer a preliminary analysis of the data collected through the end of 2024 with selected figures for data visualization. We conclude by discussing anticipated improvements for the VID as well as its potential applications for policy makers, advocates, and practitioners.

2. Comparison with other religious freedom datasets

The growing interest in academia in the documentation and measurement of religious freedom has led to the development of an increasingly rich corpus of religious freedom monitoring instruments, ranging from qualitative monographs and narrative reports to surveys and quantitative tools. Religious freedom monitoring developed into an entirely new field of study (Birdsall & Beaman 2020). After experimenting with very rudimentary ratings of religious freedom, academics started to develop increasingly sophisticated datasets to track freedom of religion or belief (FoRB) (Klocek 2019). As an illustration, Katherine Marshall's comprehensive working paper "Towards Enriching Understandings and Assessments of Freedom of Religion or Belief: Politics, Debates, Methodologies, and Practices" (2021) discusses 31 different instruments.

These datasets have in common that they present ordinal data (in contrast to event-based data like the VID). They can be categorized into three categories depending on their methodologies.[3] First, there are the socio-metric tools. These are based on the coding of narrative sources such as the International Religious Freedom reports of the US State Department. Coding of narrative sources, like other types of textual content analysis, involves developing and assigning codes to specific ideas, facts, or recurring themes found in the textual data collected. These codes are later used in analysis. The code systems enable researchers to compare various occurrences of the same code across cases or across time regarding a single case as well as discover correlations between codes that can provide meaningful insights.

The main socio-metric tools include the Government Restrictions Index (GRI) and the Social Hostilities Index (SHI) issued by the Pew Research Center, as well as the more elaborate Religion and State (RAS) Project directed by Dr. Jonathan Fox at Bar-Ilan University in Israel. Originally developed by Grim & Finke (2006; 2011), the GRI and SHI offer two complementary ways of measuring religious repression around the world. The GRI evaluates the extent to which governments restrict religious beliefs and practices, focusing on factors such as laws banning

3 The most important of these tools are accessible in a user-friendly manner by the Global Religious Freedom Data Spectrum, a project that was initially started by 21Wilberforce and is now maintained the International Institute for Religious Freedom: https://iirf.global/global-religious-freedom-data-spectrum/.

certain religious attire, restrictions on proselytism, bias in the registration of religious groups, and government harassment. In contrast, the SHI measures acts of hostility motivated by religion that occur within society itself, including mob violence, sectarian conflict, and religion-related hate crimes. Both indices provide country-level scores, allowing for broad global comparisons and trend analysis.

While the GRI and SHI developed by the Pew Research Center are frequently referenced in both academic and policy discussions (Klocek 2019; Birdsall & Beaman 2020), a significant methodological limitation is their failure to differentiate between religious traditions within a given country. This gap is addressed by the Religion and State (RAS) Project, which systematically collects data on the intersection of religion and government policies worldwide. The RAS Project distinguishes between the experiences of specific religious groups, capturing inter-group variations in treatment, legal status, and societal discrimination. Methodologically, the RAS Project employs a more rigorous data collection process, including a significantly broader range of variables and extensive use of primary and secondary sources, such as national legislation, court cases, media reports, and academic studies. This allows for a more granular, disaggregated analysis of religious freedom conditions across different traditions. In contrast to the GRI and SHI's valuable but generalized national-level scores, the RAS Project offers a nuanced, group-specific dataset essential for detailed empirical research and more targeted policy analysis (Fox 2024; Fox et al. 2018).

The second type of FoRB dataset is expert-opinion-based. Expert opinion-based assessment tools get their input from experts, either by using questionnaires or by probing a select group of experts for their opinions and attempting to reach a consensus. Consensus is pursued through continuous probing and reassessment. Some variations allow the experts to know their colleagues' opinions and discuss them in a controlled environment, thereby affecting their own opinion (Ouchi 2004:3). Tools employing this method benefit from an informed data source from which to derive knowledge and formulate strategy; however, it might be limiting. Although the opinions are informed, they are vulnerable to bias, like all humanly produced knowledge. The World Watch List of Open Doors International, for example, includes not only academics but also organization members working in specific countries as its experts, who fill out questionnaires that examine the degree and manifestation of pressure exerted on Christian communities in a territory (Sauer 2012).

Besides the World Watch List, which only focuses on Christians, another expert-opinion-based instrument is the Varieties of Democracy dataset. This quickly became very popular among political analysts and includes a single variable on religious freedom. There also is a small FoRB pilot currently being developed

by the Human Rights Measurement Initiative that uses a similar expert-opinion-based methodology.

A third category of FoRB datasets is the use of surveys. With surveys, researchers can glean information from a population of participants either directly through the questions themselves or implicitly by analyzing the respondent's answers to a few questions and checking for specific themes. In surveys, responses to questions are usually on a scale of agreeing and disagreeing with the statement at either end of a scale. This approach is beneficial because a large population can be probed in a relatively short span of time, and different interactions of variables relating to the population can be analyzed (Creswell & Creswell 2022:159). The Anti-Defamation League Global Index of anti-Semitism examines attitudes towards Jewish people in more than 100 countries and uses surveys to gather responses. Each country then receives a score based on analyzing answers regarding their attitudes towards Jewish people in general and their degree of agreement with Jewish-related stereotypes (ADL 2024).

This brief comparison demonstrates a gap in FoRB measurement tools. No dataset employs an event-based approach to measure FoRB. There was a short-lived religion pilot that was part of ACLED, but it was later discontinued.[4] While we do not claim that any singular approach can successfully capture the complexity of the phenomenon by itself, we chose the event-based approach to explore violations of religious freedoms. Thus, the VID is the only tool currently in development that attempts to monitor the infringement of religious freedoms using an event-based approach. The VID's aim is to complement other instruments and aid FoRB research by providing insight into the nature and dynamics of religious freedom violations.

3. Methodology and justification of the VID

Limited access to information is common in high-pressure or violent contexts (Glasius et al. 2018). However, these data are critically important. When incidents are documented, it is this very same written record that becomes the main justification for requesting attention to a specific social problem.

4 Other initiatives have sought to document religious aspects of conflict and violence. The Religion and Armed Conflict (RELAC) dataset, developed by the Uppsala Conflict Data Program (UCDP), focuses on the role of religion in organized armed conflicts between 1975 and 2015 (Svensson & Nilsson 2017). The Religion and Conflict Database (RDCD), led by the Peace Research Institute Oslo (PRIO), similarly documents conflicts with religious dimensions but emphasizes conflict dyads rather than individual incidents (Basedau et al. 2015). However, both datasets have not been updated in recent years. These datasets differ significantly from the VID, which focuses specifically on individual incidents of violence, discrimination, and hostility against individuals or communities based on religion or belief, with ongoing updates.

Documentation is particularly important in situations where victims of violence are afraid to report crimes to the police, or when states fail to comply with their duty to register human rights violations. To cite just one example, according to estimates by Ethos (2017), a Mexican think tank, 94 percent of all crimes in Mexico are not reported. In its report *The Human Rights Situation in Mexico*, the Inter-American Commission on Human Rights (IACHR) found that "the internal forced displacement has not been documented and analyzed comprehensively by the [Mexican] State, which is the main obstacle facing the comprehensive response that Mexico should give this phenomenon." The report also observed that the situation "is evidenced by the invisibility of the problem," which hinders efforts to "adopt the measures necessary to provide an effective response to this phenomenon" (IACHR 2015:134). Therefore, one of the most important purposes of documenting incidents, particularly when they concern human rights violations – including religious freedom – is to ensure that a record of specific violations is kept, so as to hold the responsible party accountable and demand compensation for victims.

A nascent version of the VID was developed in September 2011 to support the information management needs of the World Watch List of Open Doors International. The project was discontinued a few years later because the organization moved to a different data collection system, which is useful for its purposes, but has the disadvantage of not being public. In January 2018, the VID was integrated within the Observatory of Religious Freedom in Latin America (OLIRE, in Spanish), with a regional focus. The VID has since become a flagship project of the International Institute for Religious Freedom (IIRF), with a global focus. The worldwide update for 2021-2024 was funded by Global Christian Relief. Data on Latin America continues to be provided by OLIRE and data for Nigeria is provided by the Observatory of Religious Freedom in Africa.

The Violent Incidents Database has been developed to collect and synthesize information available in order to support religious freedom advocacy efforts. The VID attempts to establish the quantitative impacts of religious freedom violations. We adopt a very broad definition of religious freedom, in line with Article 18 of the ICCPR. We also use a broad definition of violence, operationalized through basic categories like killings, attacks on places of worship, arrests, abductions, displacement, etc. There is also an "other forms of violence" category, which can include subjective experiences of violence. We have a category for non-physical violence, though we do not actively search for records in that category. Religion is defined using the self-identification criterion, and we follow the same categories as the Religion and State project. We intentionally use broad definitions because overly specific ones would result in discarding many incidents that may have a religious component.

Beyond definitions, it's important to emphasize that the VID collects data in the broadest sense. Users can make their own selections from the data based on their own definitions of religious freedom, which may be more or less narrow.

The process of recording incidents, writing reports, and publishing about them brings a different quality of attention and can raise obscure and distant atrocities into public awareness. Establishing the quantitative impact of an issue makes it a "social fact" that can be considered (Durkheim 2013 [1893]). If it is not documented, it is as if it did not exist.

Fundamentally, the VID generates knowledge. Like all knowledge production, the VID goes beyond "facts". We seek to reduce bias by applying academic tools and training in the design of the database and with VID researchers, but it is impossible to avoid completely. Research is produced by researchers (Finlay 2002). We view this as an unavoidable part of humanity as Polanyi (1962) has argued. For this reason, and to allow users to work productively, the VID offers information with transparency. We largely rely on publicly available sources anyone can access and make these sources available for each record.[5] The VID makes explicit what is likely already implicit to area specialists and FoRB experts (Schön 2011). The VID's focus on FoRB can also provide accessible and distilled information for policy makers who might not have the same implicit knowledge but are responsible for creating social policy.

In line with the core mission of the International Institute for Religious Freedom to promote religious freedom for all faiths from an academic perspective, the VID provides reliable data to strengthen academic research in the field and to inform public policy. The global expansion of the VID included a three-year period from November 2021 to December 2024. Ten researchers with regional experience and linguistic specialties were hired and trained to monitor assigned countries. These researchers work part-time for specific periods during the year, each focusing on a specific region. They primarily concentrate on reading major news publications and reports related to their assigned areas. We have curated an annotated list of mandatory sources they must consider, along with a secondary, longer list of optional sources. Researchers are also free to browse the web in search of additional materials. The VID researchers submitted incidents

5 While the VID relies primarily on publicly available sources, a small proportion of records are based on non-public reports submitted by trusted partner organizations, including faith-based groups, religious freedom NGOs, and local monitors operating in high-risk environments. These organizations often maintain detailed internal documentation of religiously motivated incidents that, for security or political reasons, is not released publicly. Non-public reports are accepted only after rigorous vetting and, wherever possible, cross-referencing with independent information. Their inclusion ensures that incidents occurring in contexts of severe repression – where public reporting could endanger victims, witnesses, or local partners – are not systematically excluded from the dataset. In such cases, confidentiality is maintained strictly to protect vulnerable individuals and communities, in accordance with established ethical standards for human rights documentation.

along with sources to a supervisor who reviewed and continued training the researchers by giving appropriate feedback. These incidents are then analyzed by a reviewer who double-checks the incidents, verifies the sourcing, and approves the new records for admission to the database.

To ensure the reliability of external information found online, coders were provided with clear instructions alongside a tiered source list prioritizing official reports (e.g., US Department of State International Religious Freedom Reports, USCIRF reports, reputable international NGOs) and globally recognized news agencies. Coders were instructed to rely primarily on sources from this list and to exercise caution with any supplemental web searches, using only sources that were professional news outlets, peer-reviewed research, or known human rights organizations. Social media, blogs, and non-reputable sources were explicitly discouraged unless independently verified through multiple channels.

Researchers selected for coding roles were required to have a prior academic or professional background in religious freedom (FoRB) or human rights, ensuring a baseline familiarity with credible documentation standards. Before beginning independent work, research assistants received training sessions covering source evaluation, data reliability, and consistency expectations. Early in the project, all incoming coder outputs were thoroughly reviewed by senior researchers to calibrate judgment and ensure adherence to the standards. Coders were required to provide citations for every incident and, for larger or more severe incidents, to corroborate information across two or more independent sources whenever possible.

Thus, while coders had some flexibility to find supplemental information, their work was constrained by structured source guidelines, initial training, continual oversight, and source triangulation requirements, ensuring that information incorporated from web searches met the same quality thresholds as official reports and major news outlets.

We do not conduct any factual validation of the incidents we collect, as we do not have the capacity (which would require having access to researchers on the ground worldwide, which would require a massive budget). Instead, we offer the possibility of a posteriori falsification: if a user encounters an incorrect incident, they can let us know, and we may decide to remove it. This has happened a number of times.

Interrater reliability testing is not applicable to our method of data collection in the conventional sense. Our research assistants were not coding subjective impressions or judgments; rather, they were tasked with systematically extracting factual information from a pre-specified set of approved sources. Each extracted data point was then reviewed by senior researchers to confirm that the information was correctly recorded, aligned with our methodological definitions, and properly sourced.

To ensure accuracy and consistency, we implemented several key reliability mechanisms. First, all coders underwent initial training that included specific instructions on how to extract, record, and document incidents according to our coding rules. Second, all entries were subject to a mandatory review process: senior team members independently verified that the information recorded matched the source material and adhered to the coding protocols. Third, any discrepancies identified during this review were discussed with the coders and corrected collaboratively. Fourth, for complex or ambiguous cases, a second source was required, or a senior reviewer adjudicated the final coding decision.

Thus, while traditional interrater reliability statistics (such as Cohen's Kappa) are not applicable due to the structured nature of the task, we employed layered verification processes to ensure high reliability across all coders, regardless of the country, religion, or incident type being documented.

Data collection parameters were adjusted in 2023;[6] however, they do not differ considerably from the previous structure (Petri & Flores:159). To the original categories: geographical location, date of incident, summary, nature of the incident, responsible actor, religion of victim(s), additional information, and web sources, we refined the religious categories and included the religion of the responsible actor. The religion categories have been adjusted to follow the religious minorities codes used in the Religion and State Dataset.[7] The actor's religion is often not named in media reports, though we include it where possible.[8] In many cases, religious affiliation can be inferred by the name of the group claiming responsibility. For instance, the Allied Democratic Forces (ADF) in the Democratic Republic of Congo are a known Islamic terrorist group and are listed as such by the Ugandan government.

Regarding information sources, just like delicious chocolate, not all media and news reports on the internet are of equal value. When training the researchers, IIRF staff developed an annotated source list of reliable sources. These include the United States Commission on International Religious Freedom FoRB victims list, the International Religious Freedom Reports of the US Department of State, the Armed Conflict Location and Event Data Project, Open Doors Analytical, the Country Reports on Human Rights Practices of the US Department of State, Human Rights Without Frontiers, Amnesty International, Global Christian Relief, Forum 18, Human Rights Watch, Bitter Winter, Reuters, Associated Press and the

6 Access the incident reporting guide at: https://tinyurl.com/mr2jbbx8.
7 Access the codebook for religious minorities at: https://thearda.com/data-archive?fid=RAS3MIN&tab=3.
8 The starting point for our data collection are religious freedom violations. We do not begin by identifying religious actors and then start counting violent acts committed by them. In other words, any violent acts committed by actors that do have a religion but no religious motivation are not automatically included in the VID. We try to consider the various motivations and social conditions that lead to violence.

New York Times. These sources largely follow the IIRF's mandate of promoting religious freedom for all religions and have an established history of providing credible information. The researchers were given a supplemental list of 50 websites and keywords. They were also encouraged to rely on their regional knowledge and linguistic specialties. As the VID attempts to record a broad range of incidents, and since anyone interested can look back and evaluate any record, most web sources are permissible. The IIRF is entrusted with certain records on the condition of confidentiality, though this is a small minority of the total records.[9] Last year these represented approximately eight percent of incidents.

The VID raises the visibility of religious freedom violations. This visibility is instrumental in the recording and enumerating of incidents and establishing of patterns of discrimination for case-by-case and contextual analyses (FLACSO-Mexico and International Bar Association's Human Rights Institute 2017). Increased visibility aids the elaboration of recommendations for legal and policy reform and can inform national and international decision makers, religious communities and civil society organizations.

3.1. Inspiration: Event-Based Data Collection

The VID draws inspiration from event-based data collection methods in adjacent fields which have gained momentum in recent years, particularly by scholars examining conflicts, protests, and violations against minorities. Examples of such efforts include databases on conflicts such as: the Armed Conflict Location and Event Dataset (ACLED), the Social Conflict in Africa Database (SCAD) and the Uppsala Conflict Data Program (UCDP); databases and datasets on protests: the Nonviolent and Violent Campaigns and Outcomes (NAVCO) dataset, and the Violent Political Protest (VPP) dataset; and databases concerning minorities such as the Minorities at Risk (MAR) Project (Minorities at Risk). (Chenoweth & Cunningham 2013; Chenoweth & Lewis 2013; Chenoweth & Shay 2019; Raleigh et al. 2010; Salehyan et al. 2012; Wallensteen 2011).

The event-based approach uses discrete occurrences as units of analysis to study a phenomenon. The events are picked according to strict criteria, ensuring that they are relevant and similar enough to allow specific features to be analyzed, with insights gleaned from this analysis paving the way toward globalizations about the phenomenon's unique characteristics. Examples of the employment of this approach include the ACLED, which collects data on internal conflicts in 50 unstable states, based on location, actor, and date (Raleigh et al., 2010:651).

9 We also note that with a view to ensuring compliance with some states' laws on nominative data collection that the IIRF anticipates anonymizing the incident description with respect to persons' names.

Although these various projects have similar goals, and sometimes overlap, they differ in the units of analysis examined and/or in the criteria for case selection. NAVCO, for example, examines both violent and nonviolent campaigns (a campaign is defined as "… a series of observable, continuous, purposive mass tactics or events in pursuit of a political objective." (Chenoweth & Lewis 2013:416), whereas the VPP deals exclusively with violent protests that resulted in at least twenty-five casualties. There can also be differences in scope. For example, while the UCDP seeks to record cases globally, the SCAD focuses solely on Africa (Svensson et al. 2022:1708-1709).

Event-based data collection would not have been possible without the greater access to information offered to researchers in recent decades. News media published online is of particular importance. It brings greater attention to incidents, both local and global, that might not otherwise receive attention. Media sources are also often archived which facilitates selection of cases, comparative research, and time-series analysis (Demarest & Langer 2022:633).

Event-based data are important, both for advocacy and research, because they are based on reported facts rather than opinions held by experts or the measurement of attitudes in the population. This is not to say that media reports are a panacea. Potential issues can arise when relying on media reports as a data source, namely measurement errors and biases related to the way the media conveys its reports and the data within them. Some events might receive more coverage than others. This can lead to oversampling and other errors of representation. Moreover, in cases where the description of the event is also coded, the way an event is described might be biased due to the agenda of the source. This description bias can affect analysis and might lead to wrong conclusions.

The VID is certainly not immune to these limitations, as we will discuss. Most of these issues, however, can be mitigated by formulating and following strict and clear procedures for coding. This approach does not neglect the human element but minimizes the risk of errors due to biases, which VID researchers also have (Demarest &Langer 2022:638-641).

The event-based data collection projects mentioned above inspired the creation of the VID. These important initiatives are quite broad in their definition and scope and lack a commensurate focus on the issue of religious freedom. So far, there has not been a FoRB dataset that is event-based, with the exception of the now-discontinued religion pilot that used to be part of ACLED.

4. Strengths and limitations of the VID for research on religious freedom

Like any research initiative, the VID data can be misused or used appropriately. In this stage of development, it is important to remember that we are not claim-

ing that the VID presents a comprehensive picture of every nation. When looking at the tables and numbers in the database, it is tempting to read the statistics as a representation of any given country's situation. However, the information is only what has been recorded in the database by the assigned researcher. The sheer volume of religious freedom violations makes it impossible to claim exhaustive coverage.

The data included in the VID is based on reports published in digital media available on the internet, but there may be cases of underreporting or overreporting. There is no question that the media landscape in a region affects which incidents are "known." Many incidents are never made public or do not receive sufficient attention from authorities or media (underreporting). Even though we aim to collect data for all religions, we have found some better track violent incidents than others.[10] Some religious groups see real value in recording incidents and might report on events multiple times or republish other reports. Other religious traditions do not track incidents or might not have networks or funding to report religious freedom violations or advocate for their religious communities.

There is no pro-Christian bias in our data collection, except for the fact that non-Christian traditions are generally less equipped to document religious freedom violations (and some Christian denominations do better than others), and thus, their incidents may be underrepresented in the VID if they do not get into media reports or other types of reports. However, there are important exceptions, such as the data collected on antisemitism (though methodological differences mean that ADL data are not directly usable in the VID) and some data on Hindus. Muslim groups rarely collect data on violence against them, even though they are arguably victims of much violence caused by Islamist groups.

Not all violent incidents appear in news reports, or when they do, do not meet the minimal criteria to be included in the VID. Genuinely terrible violent incidents frequently occur during wars or conflicts, but do not always involve religious freedom violations. Some reports are non-specific regarding the victim or the actor. Other reports do not give enough information on the nature of the event or location but make vague and general assertions. These would not be included as they do not provide enough information to complete a single record.[11] The same applies to reports that include only aggregate data. Such reports may provide valuable statistical overviews of violations but do not disclose detailed, incident-level data. Since the VID requires individual records to ensure accuracy

10 This may be a function of resources and needs. For example, many Muslim minorities have mentioned the need to prioritize opening mosques and offering religious instruction to their children over tracking religious freedom incidents. The LDS church, on the other hand, has an entire religious freedom section of their website to inform their followers. See https://tinyurl.com/2cp5x93s

11 For more information on what constitutes a complete record, see: https://tinyurl.com/mr2jbbx8.

and traceability, we are unable to include information based solely on aggregate figures. When possible, we seek to contact data providers to request access to detailed records in order to enhance the completeness of the VID.

However, more information and events recorded complements existing datasets and will be of great value in this field, provided the information is used appropriately. We are working to incorporate high-quality sources as mentioned in the annotated source list in the previous section and transparently present the data we collect. We have also built an online self-reporting form allowing anyone to report incidents.[12] For self-reported incidents, we look for a public news source on the internet or supporting evidence to substantiate the claim. These incidents then go through the review and checking system as described in the methodology.[13]

There are also times when incidents reported in the media are incorrect or could be exaggerated for a particular constituency (overreporting). We do not have the capacity to verify all incidents listed, though we do have a quality control and vetting process, described above. If reports are flagged up as being false or incorrect, we retroactively correct entries with errors or remove them (a posteriori falsification). This has already happened through the self-reporting form. The original incident was removed thus demonstrating the efficacy of the reporting form as well as a posteriori falsification.[14] If anyone finds a case is missing or was erroneously reported, the IIRF team can be contacted.[15]

As said already, our data collection can never be exhaustive or fully comprehensive. The VID is an ambitious project but can only include data based on what is available, but it should not be viewed as a comprehensive record of everything that occurs. In the next phase of the VID, we hope to implement some automation of data collection, which will hopefully address the issue of human limitations, but we will always be constrained by the availability of public information.

5. Preliminary results

The Violent Incidents Database (VID) encompasses nearly 15,317 records up to 31 December 2024. The number of countries featuring at least one recorded incident has quickly grown. The VID began with a focus on Latin America with OLIRE as a main partner for that data. The VID also partners with the Observatory for Religious Freedom in Africa for data related to Nigeria. An increase in funding

12 See: https://iirf.global/vid/online-form/.
13 While it's true that individuals can submit their own reports, in our experience, this happens very rarely. At this stage, there is no risk of turning the dataset into a convenience sample.
14 In this case an incident of antisemitism was recorded in Germany. As this case was processed through the court system, the incident was proven false and the victim admitted to making up the story. See: https://tinyurl.com/ytdy4d8b.
15 Email: info@iirf.global.

facilitated the expansion of VID coverage to the rest of the world, beginning in November 2021. Much of the analysis illustrates the type of information and analysis possible using VID data, but it is not comprehensive of all violations in any particular country or region.

Since November 2021, the IIRF has been diligently curating the VID sources from reputable and validated data providers. Drawing on these sources, the VID documents incidents of various forms of violence associated with religious affiliations. Each incident cataloged entails at least one victim, with classifications spanning a range of categories: including killings, attempts to destroy or defile religious structures, closures of religious establishments, arrests or detentions, abductions, sexual assaults, forced marriages, physical or mental abuse, property damage targeting religious adherents, forced displacement, and non-physical forms of abuse related to religious beliefs. As of our latest assessment, we have identified 1725 incidents occurring in the year 2023, affecting an estimated total of approximately 1,887,000 individuals. In the year 2024, we collected 2956 incidents, with a total of 421,351 victims.[16]

The VID is dynamic and is continuously updated. The VID has an intermittent production cycle that depends on the output of the research assistants, the quality control review process, and the technical inclusion in the production database. We aim for all approved records to be added to the production database monthly. To date, we have only removed two records. Since the volume has been so low, we have not developed a procedure yet. Overall, 2021 to 2024 have approximately 6,000 additional probable incidents pending expert review. As a result, figures are subject to change over time as the database continues to develop and expand.

We meticulously document the perpetrator(s) responsible for each incident where available (see Figure 1). This includes both broader categories which are predefined and an open field where a specific actor can be included for any given record. This categorization allows for helpful cross-cutting analysis. Certain regions in the world experience religious freedom violations from a narrower group of actors. This figure shows how the current information needs to be contextualized.

Given that the VID has collected data in Latin America since 2015 and the global expansion began in 2021, it follows that organized crime would contain the most records. The finding that organized crime is the most common source of religious violence may seem counterintuitive, but it can be explained by two reasons. First, we have a longer history of collecting data in Latin America, a region where organized crime is indeed a significant source of violence, including vio-

16 The number of victims in 2023 was significantly higher due to the displacement of 120,000 Christians from the Armenian enclave of Nagorno-Karabakh in Azerbaijan in September 2023.

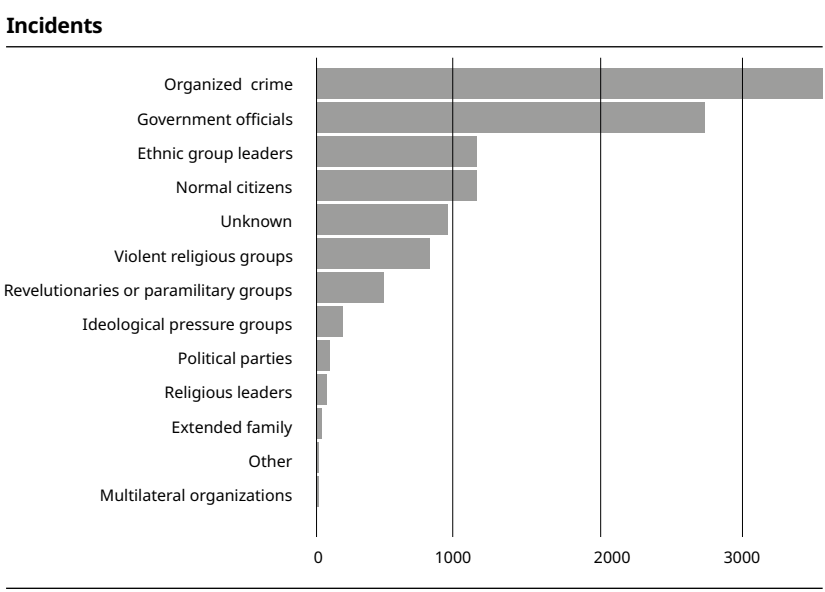

Figure 1. Incident catergorized (2015 - 2024)

lence against religious people. (Before the VID started collecting data, organized crime as a source of religious freedom violations was generally overlooked by existing scholarship, highlighting the empirical value of the data we collect.) Second, in some countries where one might expect religious violence, reported incidents are surprisingly low. For instance, despite common assumptions, countries such as Saudi Arabia and Somalia do not exhibit the high frequency of religiously motivated violence that might be anticipated – presumably because government discrimination is already so high that violence is "unnecessary". In other cases, like North Korea, Afghanistan, and parts of China, we have good reason to believe there is significant religious violence, but much of it does not appear in public records. Both factors confirm that the database is not comprehensive and is influenced by the availability of data and our regional experience. The data on Nigeria is extensive compared to other countries because we have a reliable partner there, the Observatory of Religious Freedom in Africa.

For comparative analyses in the context of FoRB, the ability to categorize incidents can also facilitate overarching classifications of state and non-state groups (Figure 2). This analytical perspective is valuable for documenting incidents and counting affected individuals. When looking at the total number of victims impacted by incidents, we observe a significant reduction in incidents attributed to

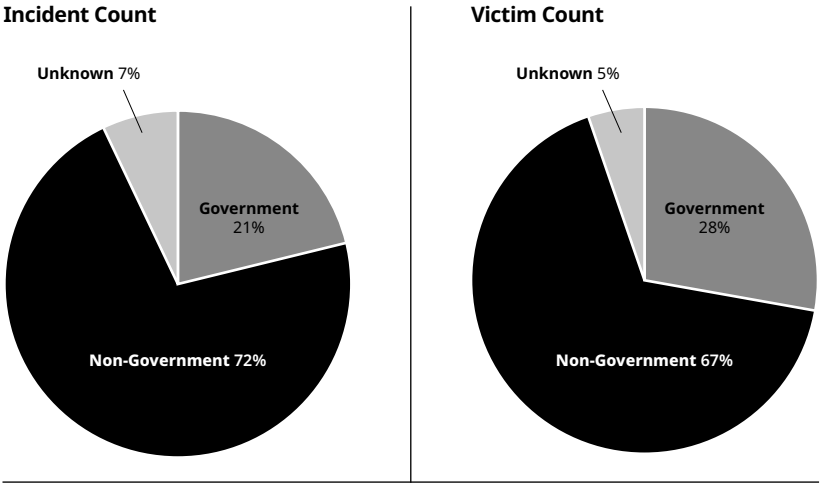

Figure 2. Incident and Victim counts with respect to Government and non - Government Perpetrators

unknown instigators. This trend suggests that instances of anonymity are typically associated with lower victim counts.

Over the last 12 months of 2024, a certain normalizing process seems to have occurred with the rapid expansion of the dataset with respect to one key metric: the government/non-government distinction for the perpetrator has remained relatively stable. A further comparison into the future will reveal whether or not this is a coincidence but for now we can observe that whether measuring the implication of state actors in FoRB violations at an incident count level or a victim count level, the proportions are also somewhat similar.

However, we know that victim counts can distort the overall picture, which is why the VID records discrete cases against individuals while also acknowledging incidents that impact a larger number of individuals. This approach presents methodological challenges that are important to keep in mind when aggregating data. Certain incident categories are less likely to involve mass events, while others may indeed involve substantial numbers of victims (e.g., incidents categorized as 'forced to leave home'). An alternative method, which offers greater ease of visualization, involves analyzing the frequency of assigned categories to incident records irrespective of the number of victims (see Figure 3). It is also important to state that certain events, such as those related to sexual abuse, are infrequently reported, despite potentially occurring with relative frequency.

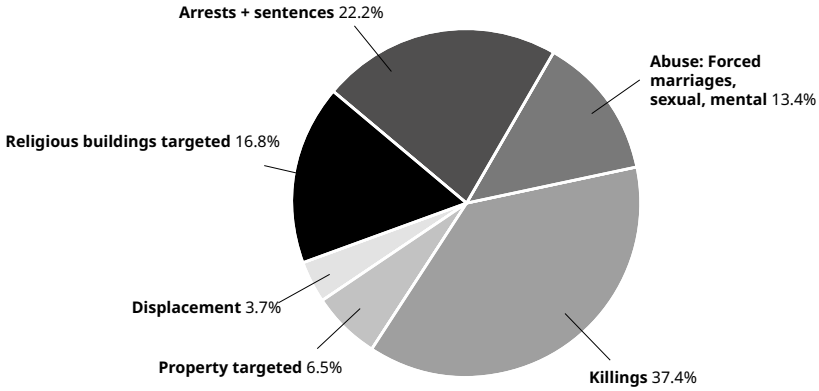

Figure 3. Incidents by violence category, November 2021 to December 2024.

Looking at incident categories, and not individuals, allows numerical analysis to incorporate mass events without obscuring smaller or more frequent events (Figure 4). Therefore, despite the VID documenting 446 incidents involving victims being forcibly displaced since 1 November 2021 (of which 175 occurred in 2024), the total number of victims in this category amounts to 384,310 individuals for the 3-year period. The largest singular occurrence within this category affected 200,000 people from the forced displacement of Rohingyas in Myanmar on 18 May 2024, before most of their buildings were set on fire.

In addition to enumerating incidents, calculating median values provides valuable insights into the typical scale of victimization recorded in the VID (see Figure 5). The data reveals that most incidents involve relatively small numbers of victims: even accounting for recent increases in mass displacement incidents, the median number of victims remains only nine. This highlights the VID's focus on systematically documenting both small-scale and large-scale violations. The visualization also shows that the majority of incidents typically affect between 1 and 94 individuals. Nevertheless, exceptional cases – such as incidents categorized as "Forced to leave Country" and "Forced to leave Home" – record maximum victim counts of 120,000 and 200,000, respectively. These outliers demonstrate the importance of using medians rather than means when analyzing the data, as they prevent disproportionate influence from extreme cases.

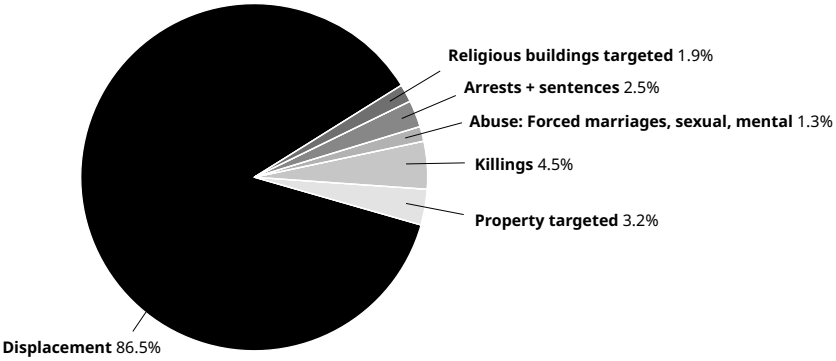

Figure 4. Victims by violence category, November 2021 to December 2024.

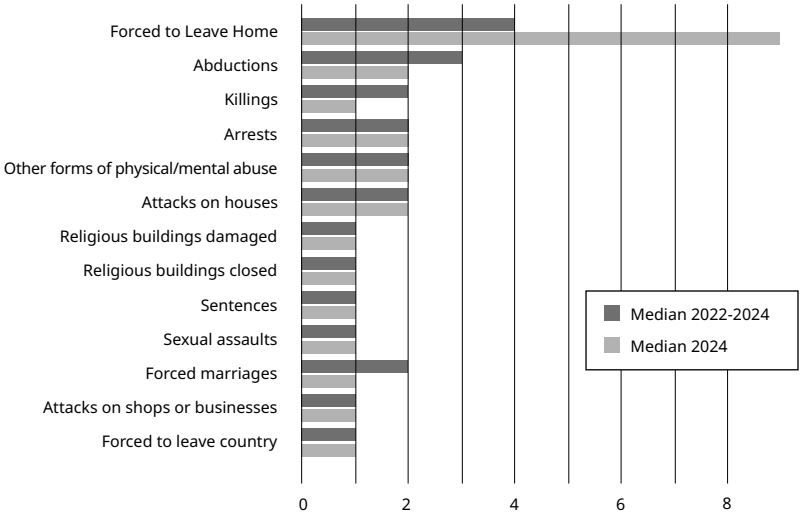

Figure 5 Violence category median victims (where >0), November 2021 to December 2024.

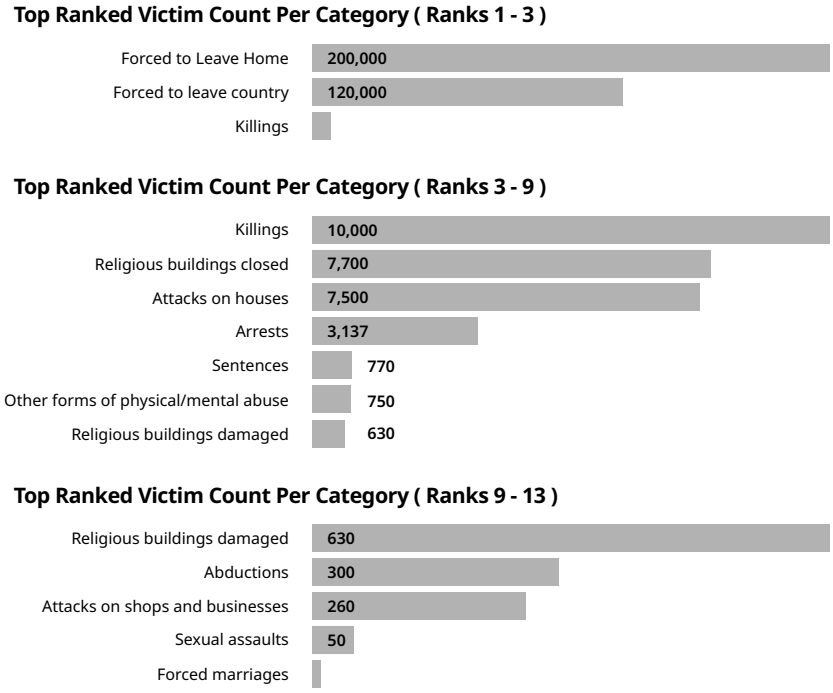

Figure 6. Top ranked victim count per category.

In Figure 5, the years 2021-2023 were combined into a single group to create a more stable and representative baseline for comparison. Given that the Violent Incidents Database (VID) was still in its early development phase during those years, the number of recorded incidents was relatively smaller and potentially more volatile if analyzed year-by-year. Aggregating data across three years mitigates fluctuations and enables a clearer comparison with the more complete and rapidly growing dataset for 2024.

To provide further context regarding this variability in light of median values, let us examine the highest-ranking VID incidents per category based on victim count in the three rankings in Figure 6 (data sourced from 1 November 2021 to December 2024).

With recorded incidents related to physical violence, we see a greater spread of actors, meaning that more marginal perpetrators are no longer able to hide in the shadow of the large numbers of victims in some incidents (see Figure 7).

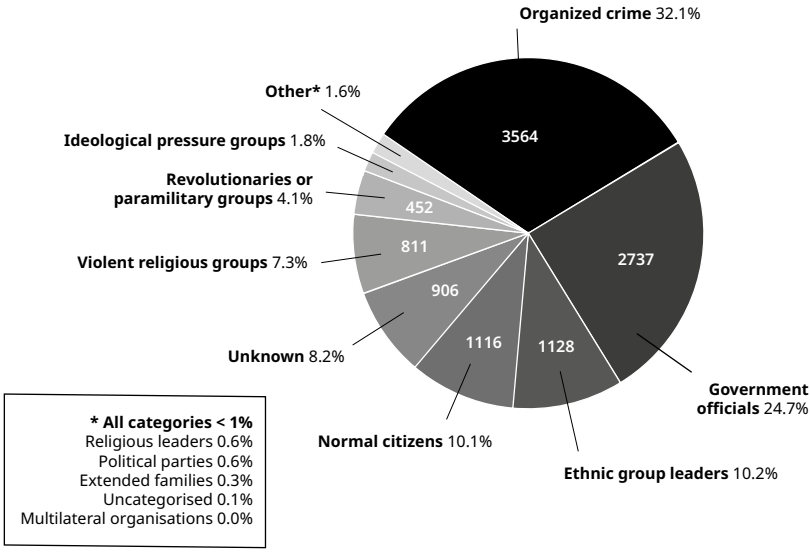

Figure 7. Incidents per perpetrator category.

6. Added value of the VID

It is important to keep in mind that the VID is intended as a complement to other FoRB datasets, not to replace them. The VID contributes to FoRB research by collecting additional data, highlighting blind spots or spotlighting undetected forms of religious freedom violations. We encourage all FoRB datasets to make use of the VID data as additional input.

First, in ways similar to the Armed Conflict Location & Event Data Project (ACLED) and the ADL's USA audit, the VID enumerates and categorizes the impact of real-world stories about disheartening infringements on individuals' fundamental right to religious freedom. In this sense, the VID constitutes an advancement in religious freedom research because it complements the other FoRB datasets by presenting evidence that should not be denied. It is based on reported facts.

Second, the VID is also geographically scalable. It provides insights into subnational variations at the country level all the way to global trends. Location variables can facilitate an analysis of events taking place within a given state, province, or territory. Building on a variation not detected by the main FoRB datasets, the VID's dataset supports much-needed subnational analysis, albeit with the usual caveats of non-exhaustive data. Overall, VID records significant subnation-

al data. Only 335 records do not have it (4.3 percent of the total current dataset comprising 7722 records).

Nigeria, Nicaragua, Mexico and Colombia are the richest VID sources for violent incidents also defined at the subnational level. Table 1 illustrates the richness and contrasting information available at the level of provinces, departments, and states since November 2021, expanding for a sample country, Colombia (Table 2):

Country	State/Department	Incident Count
Nigeria	Kaduna	805
	Niger	600
	Plateau	337
India	Uttar Pradesh	131
	Manipur	41
	Karnataka	36
China	Sichuan	56
	Guangdong	22
	Xinjiang	21

Table 1. Subnational variation in Nigeria, India and China.

Let us focus on Colombia, noting also population statistics and incidents per capita:

Country	State/Department	Incident Count	Population	Incidents per Capita x 1,000,000
Colombia	Arauca	28	294,206	95.2
	Chocó	37	544,764	67.9
	Cauca	64	1,491,937	42.9
	Norte de Santander	44	1,620,318	27.2
	Valle del Cauca	93	4,532,152	20.5
	Nariño	33	1,627,589	20.3
	Magdalena	28	1,427,026	19.6
	Cesar	20	1,295,387	15.4
	Antioquia	55	6,677,930	8.2
	Cundinamarca	19	3,242,999	5.9

Table 2. Subnational variation in Colombia.

We can now examine these ten, greater concentration Colombian departments to highlight the power of subnational analysis with respect to recorded FoRB incident occurrences. These departments are illustrated in Figure 8 below. We analyze subnational variation, therefore, by also factoring in population distribution, which is a vital step in assessing the religion-associated violence at this

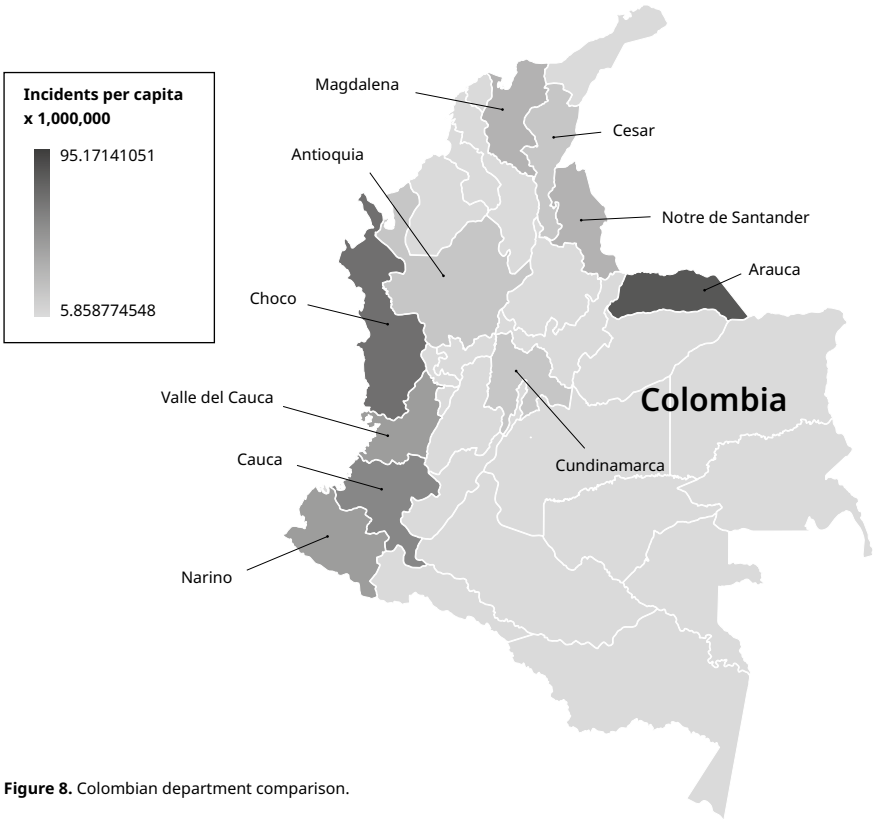

Figure 8. Colombian department comparison.

level. The data derived from the VID strongly suggests that when examining religious violence incidents in Colombia, other factors than geography are at play since the most frequent incidents-per-capita departments (Arauca, Chocó and Cauca) are not spread across the country.

This intriguing observation presents an avenue for exploration by stakeholders and policymakers within Colombia and beyond who aim to reduce violence in the country. Subnational data allows researchers to extract insights by establishing correlations between their own datasets and other subnational data, such as income levels.

The comparison with FoRB datasets also suggests that government and social discrimination in Colombia are low and medium, respectively. However, this does not account for subnational variation, because the departments of Arauca, Chocó and Cauca exhibit high numbers of violent incidents.

Thirdly, the VID is dynamic. If new information arises around an incident, then this incident can be updated or even removed. Furthermore, anyone can contribute to an incident, even though our team of researchers will verify the data before editing and adding it to the database. This publicly available, event-based, and dynamic repository allows for continuous updates and corrections to provide accurate and up-to-date information. The IIRF has made the VID publicly accessible and searchable[17] as a public good which we hope will be used and maintained by everyone in the FoRB community.

Fourthly, the open-source approach to data collection has beneficial social relevance. Removing impediments for the systematic recording of violations of religious freedom allows for better and more accessible documentation of incidents, with the possibility of deterring further violence.

Fifthly, the VID allows for a greater degree of granularity. It distinguishes between several categories of state and non-state actors, tracks the religions of the victims and the perpetrators where possible, and records the subnational location where the incidents occurred. Such levels of detail are unavailable in other current FoRB datasets.

In contrast to broader measures of religious freedom such as the Government Restrictions Index (GRI) and Social Hostilities Index (SHI) developed by the Pew Research Center, the VID adopts a more micro-level approach by systematically documenting specific incidents of violence and discrimination motivated by religious identity. These incidents include physical attacks, arbitrary arrests, vandalism of religious sites, and forced conversions. Whereas the GRI and SHI assess the national legal and social environments surrounding religious freedom – offering valuable but aggregated indicators of systemic conditions – the VID captures discrete, verifiable acts of religious persecution, providing a granular, event-based perspective particularly suited for legal advocacy, humanitarian response, and detailed empirical analysis. Moreover, while the GRI and SHI do not differentiate between specific religious traditions, a limitation also addressed by the Religion and State (RAS) Project, the VID similarly offers disaggregated data that underscores the lived realities of religious communities at the ground level. Taken together, these datasets reflect complementary approaches: the GRI and SHI illuminate national patterns and regulatory environments, the RAS Project provides nuanced differentiation between religious groups within those environments, and the VID captures the immediate manifestations of religious hostility as experienced by individuals and communities.

In this sense, the VID makes it possible to discern patterns of religious freedom violations which are helpful for comparative analysis, as illustrated in Figure 9.

17 See http://vid.iirf.global/web/search/search.

FoRB datasets typically gauge governmental discrimination, societal discrimination, or both. Grim & Finke already established a connection between social restriction of religion and government restriction of religion, in which the former encourages the latter, and both lead to violent religious persecution (2011:73). It is reasonable to hypothesize that governmental discrimination aligns with violent incidents instigated by state actors, while societal discrimination aligns with violent incidents instigated by non-state actors. When there is a divergence, this could point either to a gap in the VID, or to a gap in the FoRB datasets. It could also signal the complementary value of the VID.

The classification into high, medium, and low categories was achieved by dividing the country scores for each metric into three equal groups: the top third representing "high" (3), the middle third "medium" (2), and the bottom third "low" (1).

We offer two brief examples. Colombia scores low on government restrictions and medium on social hostilities according to the Religion and State (RAS) metrics. However, upon scrutinizing the violence data extracted from the VID, it becomes evident that violence perpetrated by state actors is rated as medium, whereas incidents involving non-state actors are classified as high. This discrepancy implies that the RAS metrics may overlook certain subtle subnational disparities identified by the VID.

Regarding Somalia, the RAS government discrimination measures are high, but the violent incidents instigated by government actors contained in the VID are low. There may be two explanations for this. The first is that the level of government discrimination is so suffocating that it does not need to engage in any form of physical violence against religious minorities. The second explanation is that there is a data gap in the VID, which is very possible, considering the fact that data availability for this country is a known challenge.

Finally, as the VID continues to expand and develop it will become increasingly representative of reported religious violence throughout the world. If this potential can be realized, the VID would be a true window into violence and drivers of hostility that limit FoRB across the earth.

7. Concluding remarks

The VID is the only FoRB measurement tool that is events-based, as opposed to all the other tools that are expert-opinion-based. Both types of sources have their place, but the VID adds value by providing additional granularity. We identify the religious affiliations of both victims and perpetrators, distinguish between several categories of state and non-state actors, and include subnational data, which no other FoRB tool does. The VID is already revealing empirical gaps in other

Figure 9. Pattern analysis between datasets (selected countries).

FoRB tools. It can also be seen as introducing a new category in FoRB monitoring, which has until now been dominated by Pew's "government restrictions" and "social hostilities" categories (the latter category probably still being too broad). We add a third category, "violence", and show that patterns can be identified us-

ing these three categories. For example, there are countries where government restrictions are high, but violence is low, or vice versa.

Further, the VID is open-source and dynamic, publicly accessible and searchable. The VID is still in development, but it has already been used in publications by the United States of Peace (Klocek & Bledsoe 2022; Petri & Flores 2022) and the US Commission on International Religious Freedom (Petri et al. 2023; Petri & Klocek 2025). It was presented at the IRF Summit in January 2024 and featured in a Universal Periodic Review report by the UN Human Rights Council on Nigeria, as well as referenced in two country reports by the US State Department. It serves as a powerful tool for monitoring and advocacy because successful advocacy and awareness-raising rely on factual information.

Adding layer(s) of automation to the procedures of data collection, standardization and storage would benefit the VID. As demonstrated by tools used in both academic and nonacademic circles, the added value of integrating machine learning models, or other artificial intelligence technologies into tools and workflows is high. It is our objective to streamline incident capture and harness some of the potentials of AI to improve the thoroughness of research and develop the representativeness of the records contained in the database. This can facilitate data validation and allow for more rapid operations overall. Hence, it merits consideration going forward.

As we have demonstrated in this paper, the VID complements various FoRB tools by tracking specific incidents. The focus on violence, religious freedom, and public sources means that the VID has limitations that must be acknowledged to use the data appropriately. Yet, the VID can offer data and analysis that, when combined with other research tools, can provide novel insights. The VID contribution of tracking the religious affiliation of both the actor and victim and data-rich categories with subnational information offers a unique contribution. Detailed information at this level is invaluable for understanding the nature of religious freedom violations in a given country. Religious freedom is deeply connected to human rights, therefore even those working beyond FoRB issues should pay attention to trends and developments illustrated by the VID. It is this very information which should inform ongoing research and policy analysis. The International Institute for Religious Freedom hopes the VID will become a trusted source for researchers and policy makers and is an important part of promoting freedom of religion or belief for all.

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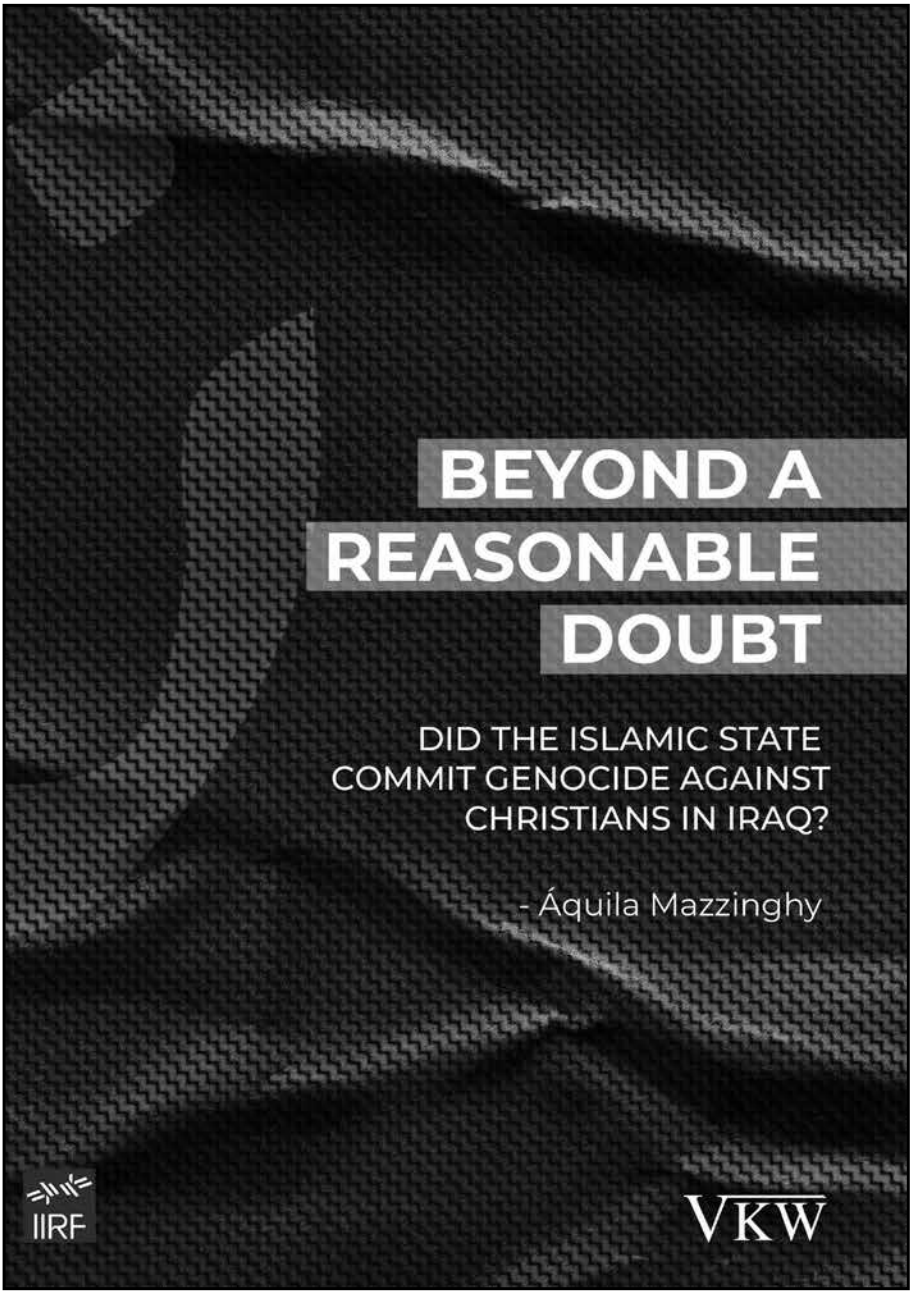

Religious Freedom Series Vol 7, VKW: Bonn, 2023. 403 pp. ISBN: 978-3-862269-267-5.
Download at www.iirf.global

Noteworthy

The noteworthy items are structured in three groups: annual reports and global surveys, regional and country reports, and specific issues. Though we apply serious criteria in the selection of items noted, it is beyond our capacity to scrutinize the accuracy of every statement made. We therefore disclaim responsibility for the contents of the items noted. The compilation was produced by Janet Epp Buckingham.

Annual Reports and Global Surveys

Aid to the Church in Need Annual Report 2025
Aid to the Church in Need, 21 October 2025
https://tinyurl.com/5z6hyntk
This report is published every two years. It analyzes religious freedom for all and indicates that almost 5.4 billion people live in countries with serious religious persecution.

2025 Annual Report
USCIRF, March 2025
https://tinyurl.com/5yut2bzh
This annual report of USCIRF on religious freedom in the world recommended maintaining the Country of Particular Concern status of 12 countries and adding an additional four to that list. It identified a further 12 countries to have the Special Watch List designation.

Regional and Country Reports

Afghanistan: Freedom of Religion and Belief in Afghanistan
International Institute for Religious Freedom, 8 May 2025
https://tinyurl.com/mr4367kp
This project evaluates the work of the Afghan National Shura al Ulema Council, an entity comprised of religious scholars who interpret and disseminate Islamic law. The study analyzes 700 cases reported as FoRB violations, from multiple municipalities, that were put before the Ulema Council between 2020 and 2022.

Afghanistan: General Briefing
Christian Solidarity Worldwide, 29 May 2025
https://www.csw.org.uk/2025/05/29/report/6512/article.htm

This factsheet sets out the legal framework in Afghanistan, which includes an apostasy law prohibiting conversion from Islam. It also details the continual and significant decline in religious freedom in Afghanistan.

Algeria: General Briefing
Christian Solidarity Worldwide, 3 June 2025
https://www.csw.org.uk/2025/06/03/report/6536/article.htm
This factsheet describes the Algerian laws restricting religious freedom for non-Muslims. It also identifies the challenges of anti-proselytism and blasphemy laws.

Angola: Religious Freedom in Angola
International Institute for Religious Freedom, 1 July 2025
https://tinyurl.com/mr2rha2x
This article critically analyzes the proposed amendment to Law No. 12/19 in Angola, focusing on its compatibility with the Constitution. Based on documentary analysis, empirical data from religious leaders and experts, and legal comparison, the study concludes that the proposed law undermines religious autonomy and violates constitutional principles.

Bangladesh: General Briefing
USCIRF, 21 July 2025
https://www.uscirf.gov/publications/bangladesh-factsheet
This factsheet provides a summary of religious freedom conditions in Bangladesh, including key observations from USCIRF's country visit.

Central African Republic: General Briefing
Christian Solidarity Worldwide, 29 May 2025
https://tinyurl.com/463uvp7j
This factsheet identifies ongoing violence and insecurity as threats to religious freedom in the CAR.

China: General Briefing
Christian Solidarity Worldwide, 29 May 2025
https://tinyurl.com/y9byy794
This factsheet highlights the ongoing deterioration of conditions for religious adherents in China. In May 2025, Measures for the Suppression of Illegal Social Organisations came into force, prohibiting organizations from conducting

activities unless they are registered. This has allowed further repression of the large house church movement in China.

Colombia: General Briefing
Christian Solidarity Worldwide, 29 May 2025
https://tinyurl.com/yc82vec6
This factsheet indicates that levels of violence have been increasing in the last six months in Colombia. Churches are seen as rivals to guerrillas and are often targeted for this reason.

Eastern Europe and Central Asia: Global Religious Freedom Index 2024-2026
International Institute for Religious Freedom, 1 August 2025
https://tinyurl.com/mr28b84r
This report analyzes the status of religious freedom in 30 post-communist countries and territories in Eastern Europe and Central Asia, using 2023 data from Round 4 of the Religion and State Project. State favoritism toward dominant religions, especially Orthodox Christianity and Sunni Islam, is widespread throughout the region.

Egypt: General Briefing
Christian Solidarity Worldwide, 30 May 2025
https://tinyurl.com/2s4jprdt
This factsheet notes the deteriorating situation for the Christian minority in Egypt, which is subject to sectarian violence and terrorism.

Eritrea: General Briefing
Christian Solidarity Worldwide, 18 November 2025
https://tinyurl.com/y6kuea5z
This factsheet briefly describes the ongoing forced disappearances and detention of Christians in Eritrea. It also notes the challenges of forced military service for Christians.

Europe: Intolerance and Discrimination Against Christians in Europe Report 2025
Observatory on Intolerance and Discrimination Against Christians in Europe, 17 November 2025
https://tinyurl.com/mr3cd9jy
This report identifies 2,211 anti-Christian hate crimes in 2024. The figure includes a significant rise in personal attacks, which increased to 274 incidents, and

a sharp spike in arson attacks targeting churches and other Christian sites. According to OIDAC Europe's findings, most anti-Christian hate crimes were recorded in France, the United Kingdom, Germany, Spain, and Austria.

Georgia: Freedom of Religion or Belief in Georgia: 2024 Report
Tolerance and Diversity Institute, July 2025
https://tinyurl.com/zfmuh5ra
This report focuses on the May 2024 law "On Transparency of Foreign Influence," adopted by the Georgian Dream government, which violates freedom of religion and belief alongside other fundamental human rights and endangers the activities of religious organizations.

India: Systematic targeting of Christians in India: January-July 2025
Evangelical Fellowship of India Religious Liberty Commission, 4 August 2025
https://tinyurl.com/2s3ts2tv
The Religious Liberty Commission of the Evangelical Fellowship of India has documented 334 incidents of systematic targeting against Christian communities across India between January and July 2025. These verified cases represent a sustained pattern of violations affecting Christians in 22 states and union territories, with incidents occurring consistently every month.

India: General Briefing
Christian Solidarity Worldwide, 29 May 2025
https://www.csw.org.uk/2025/05/29/report/6513/article.htm
This factsheet outlines the legal challenges for religious minorities as well as the Hindutva agenda behind them. It identifies communal violence as a leading challenge for religious minorities.

Mexico: General Briefing
Christian Solidarity Worldwide, 29 May 2025
https://tinyurl.com/3ucwcmy5
This factsheet outlines the challenges faced by religious minorities, posed by both Catholic-majority communities and organized crime.

Myanmar: General Briefing
Christian Solidarity Worldwide, 29 May 2025
https://tinyurl.com/3dupx72h
This factsheet outlines the religious intolerance Christians face under the country's Buddhist nationalist government.

Nicaragua: General Briefing
Christian Solidarity Worldwide, 29 May 2025
https://tinyurl.com/337pks86
This factsheet identifies the deteriorating situation for religious adherents in Nicaragua. Public manifestations of religion are prohibited. Religious leaders are subject to arbitrary detention or exile.

Nicaragua: Policy Brief
Open Doors, June 2025
https://tinyurl.com/3jxwa8fe
This brief outlines the increasing pressure faced by religious communities in the country, particularly in light of government actions that have targeted faith-based institutions, leaders, and practices.

Nigeria Country Update
USCIRF, 21 July 2025
https://tinyurl.com/y4f5hjfy
This report provides an update on freedom of religion or belief in Nigeria. Twelve state governments and the federal government enforce blasphemy laws, prosecuting and imprisoning individuals perceived to have insulted religion. Despite efforts to reduce violence by nonstate actors, the government is often unable to prevent or slow to react to violent attacks by Fulani herders, bandit gangs, and insurgent entities such as JAS/Boko Haram and the Islamic State West Africa Province (ISWAP).

Nigeria: General Briefing
Christian Solidarity Worldwide, 18 November 2025
https://tinyurl.com/4bdrd66r
This factsheet gives updates on the severe and ongoing violence against Christians in Nigieria.

Pakistan: Blasphemy Law: The Reason for Injustice in Pakistan
International Institute for Religious Freedom, 12 November 2025
https://tinyurl.com/ye24nxra
This report analyzes 117 legal cases between 2000 and 2025. The findings reveal deep flaws in police investigations, judicial processes, and state responses, with mob violence often causing an escalation of local conflicts. Victims and their families face long detentions, displacement, and social exclusion even after acquittal.

Pakistan: General Briefing
Christian Solidarity Worldwide, 29 May 2025
https://tinyurl.com/yr7j3r8e
This factsheet outlines the challenges for religious minorities in Pakistan, including spurious blasphemy charges, entrenched discrimination, abductions, rape, forced conversion and forced marriages.

Sri Lanka: The State of Religious Freedom in Sri Lanka Annual Report
National Christian Evangelical Alliance Sri Lanka, 24 June 2025
https://tinyurl.com/2me5ev4h
The report looks at developments in legislation and policy, socio-political dynamics and governance, community and cultural trends, and public and media sentiment that shape the religious freedom landscape, beyond the instances of violations that are typically reported. Notably, the report also introduces a set of indicators and a scorecard designed to track and assess the religious freedom climate over time, supporting more consistent, evidence-based analysis and advocacy going forward.

Sudan: Attacks on Places of Worship
Christian Solidarity Worldwide, 17 November 2025
https://tinyurl.com/3jsfw86r
This factsheet documents the houses of worship that have been destroyed during the Sudan civil war, with a particular focus on El Fasher.

Sudan: General Briefing
Christian Solidarity Worldwide, 18 November 2025
https://tinyurl.com/yandepum
This factsheet provides updates on the impact of the civil war on the Christian minority in Sudan. Of particular concern are the destruction of churches and sexual violence against women and girls.

USA: Religious Liberty in the States 2025
First Liberty Institute, 14 July 2025
https://religiouslibertyinthestates.com/
This is the fourth annual report of a state-by-state comparison of religious liberty in the USA.

Venezuela: General Briefing
Christian Solidarity Worldwide, 29 May 2025

https://tinyurl.com/5n7fa7rx
This factsheet identifies the evolving situation under President Nicolas Maduro. Religious groups that support the president have freedom and benefits while those who oppose him face restrictions.

Vietnam: General Briefing
Christian Solidarity Worldwide, 29 May 2025
https://tinyurl.com/3sn22jvr
This factsheet gives significant updated information about violations against religious minorities. It also indicates that the Vietnamese government engages in transnational repression of minority members who have fled to Thailand.

Western Democracies: Global Religious Freedom Index 2024-2026
International Institute for Religious Freedom, 14 November 2025
https://tinyurl.com/w9nndp4r
This report analyzes the status of religious freedom in 27 Western democracies, using 2023 data from Round 4 of the Religion and State Project. Overall, the findings suggest that Western democracies are moving toward a model in which religion is increasingly regulated and socially contested.

Specific Issues

Authoritarianism: Democracy, Authoritarianism, and Religious Freedom
International Institute for Religious Freedom, 25 September 2025
https://tinyurl.com/27cy97hm
This report calculates that 72 percent of the world's population live under authoritarian regimes. It discusses the implications for religious freedom.

Global Religious Demographics: How the Global Religious Landscape Changed From 2010 to 2020
Pew Research Center, 9 June 2025
https://tinyurl.com/bdekc6uu
This report on global religious demographics shows that the Muslim population grew most rapidly while Christian growth lagged behind the global population increase.

Militant Islam: Africa Surpasses 150,000 Deaths Linked to Militant Islamist Groups in Past Decade
Africa Center for Strategic Studies, 28 July 2025
https://africacenter.org/spotlight/en-2025-mig-10-year/

Militant Islamists have expanded their presence in Africa across the Sahel. Escalating violence in the Sahel and Somalia has caused fatalities linked to militant Islamist groups in Africa to surge by 60 percent since 2023.

Non-Governmental Actors Violating Religious Freedom in the Southern Cone of the Americas
International Institute for Religious Freedom, 25 September 2025
https://tinyurl.com/2yknuxae
This report states that in the Southern Cone of the Americas (Argentina, Chile, Paraguay and Uruguay), many of the most significant constraints arise from non-state actors. These actors exert pressure through direct violence, social exclusion, symbolic coercion, and territorial displacement.

Peaceful and Inclusive Societies
Inter-Parliamentary Union, June 2025
https://tinyurl.com/35as3e23
The report explores ways in which parliaments and especially parliamentarians interact with religion and belief to promote more peaceful, just and inclusive societies. It considers how religious engagement by policymakers can contribute to upholding the rule of law, human rights and democracy.

Book reviews

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Book Reviews

Methods to Explore Freedom of Religion and Belief: Whose Reality Counts?

Jo Howard and Marit Tadros (eds.)

Bristol: Bristol University Press, 2023, 255 pp., ISBN: 978-1529229288, £28.99

A 255-page book on research methodology? Who is going to read this, and will it be interesting to anyone at all? These questions came to my mind when I was asked to review this book. However, I was pleasantly surprised. This is a valuable source for anyone interested in learning about how to do research and interpret social impacts, and especially in the method known as participatory research (PR).

The book refers to research involving religious minority groups in various contexts, including India, Nigeria, Iraq and Pakistan. It shares a number of observations and challenges that are familiar to everyone doing research on freedom of religion and belief (FoRB), such as "mistrust between different communities, or between certain groups and their government, due to discrimination, persecution and even lynching and murder" (17). The multifaceted nature of FoRB extends beyond legal rights; it's described as "a multi-dimensional resource or stock of fungible capital – spiritual, moral, psychological and emotional capital" (44). As one of the editors comments, applying PR to the study of religious inequalities has "challenged me to consider how people's religion and belief are profoundly connected to how they experience the world" (6). Finally, research can also suffer from very practical limitations such as a lack of female researchers, as a contributor from Pakistan explains (181).

What does PR do to overcome such challenges, and why might it be a better approach to understanding how limitations on FoRB are experienced in everyday life? First, it is interesting to contrast the participatory model with the more traditional use of surveys based on questionnaires, or what one researcher from Iraq termed the "extractive model" (141). One strength of the participatory model is its recognition that participants are more than victims; they are humans with agency (219), and in PR, the individuals' realities count (235). They are listened to and not treated merely as sources to fill in pre-formulated answers or confirm a pre-concluded research concept. The book showcases various forms of PR, such as "river of life/road of life" exercises and participatory and matrix ranking, illustrating how they are adapted to specific cultural and political environments.

Each model, along with how it was practiced in and adapted to real life, is described in some detail. This is one of the book's strengths.

Each chapter contains a background section that provides information about the political, ethnic and religious setting of the region where the research took place. Then, methodology and actual implementation are described, with discussion of the findings and challenges that were encountered. Each chapter concludes with reflection on the results, benefits and limitations of the particular method used.

One obvious challenge is that PR results in the production of granular or highly localized (the book uses the term "decolonized data"(45)), which is difficult to generalize or apply fruitfully at a nationwide or even broader level. PR also has the potential to frustrate and even disenfranchise participants. Although the results tend to be hyper-local in nature, participants, having shared deeply personal experiences, may anticipate quicker and more substantial change than is realistically possible. Hyper-local results are difficult to translate into tangible policy proposals that decision makers can easily implement. One very encouraging example of successful implementation appears in a chapter that explains how teachers were trained to become effective promoters of FoRB principles in education (144ff).

Building trust, active listening, and reconciling conflicting accounts require considerable time. One researcher from Nigeria remarked that PR is "a long procedure" (90). A researcher from Pakistan highlighted the need to clarify "recorded contradictions within each interview" (183), illustrating the painstaking process involved. This is, however, a challenge with any method, as all researchers encounter new questions or difficult-to-resolve data issues along the way. After all, researching FoRB means researching real-life matters that are very close to people's hearts. As a result, one rarely gets simple, black-and-white answers.

The editors write in their conclusion,

> Global data on FoRB is in high demand. Participatory methods may not allow the production of such data, however, because, as discussed in the introduction, global data on FoRB is necessarily problematic on grounds of reliability and rigour of methodology. Hence, it may be that we need to live with a trade-off between an accurate but localized pulse of the situation of the religiously marginalized on the ground through participatory methods, with global datasets premised on the aggregation of datasets collected through problematic methods (230).

This might sound like a rather dark view of research on FoRB. But I believe that as long as global research is transparent about its methodology and if its advantages and limitations are discussed openly, all research methods can complement each

other and contribute to the ultimate goal – namely, not only counting the realities of individuals but helping them experience an improved quality of life.

Daniel Ottenberg, Human Rights Lawyer, Germany

Ending Persecution: Charting the path to global religious freedom

H. Knox Thames

South Bend, Ind.: University of Notre Dame Press 2024, 400 pp., ISBN 978-0268208677, $45 US

Ending Persecution illuminates the threats to religious freedom, proposes innovative strategies for response, and challenges the United States to reaffirm its commitment to combating persecution. Knox Thames frames the stakes with a critical question: "The defining question of the twenty-first century will be whether we can defeat the age-old scourge of religious persecution. How can we best help those suffering for their beliefs? What should we do?"

The book intertwines Thames' personal experiences as a US State Department diplomat and US Commission on International Religious Freedom commissioner, offering insights into both the theory and practice of international religious freedom.

Let's begin with a pressing question: In the context of the second Trump administration, does Thames' book belong to a bygone era?

Thames champions a principled, consequential US foreign policy and an outward-looking American polity. He calls for stronger bilateral and multilateral engagement by the United States, and he suggests elevating international religious freedom as a foreign policy priority, as well as institutionally within the State Department (306).

The opposite is happening. The State Department has been downsized and is now staffed by leadership skeptical of multilateralism. Human rights, development, and humanitarian aid have been deprioritized within the institutional framework. The current administration's foreign policy is characterized by a transactional approach, with America increasingly looking inward. Furthermore, the US has withdrawn from the United Nations Human Rights Council, the World Health Organization, and the Universal Periodic Review – the UN's human rights monitoring process. It has shut down many of USAID's lifesaving programs.

Thames rightly calls for the credible and consequential use of sanctions as well as accountability for genocide, including through the International Criminal Court (ICC). Yet the US has continued to supply weapons to Israel as it conducts a devastating war and imposes starvation, resulting in the death of close to 70,000 (possibly 100,000 deaths according to some studies) Palestinians in Gaza. At the

same time, the United States has imposed sanctions on the ICC in response to charges against Israeli leaders for crimes against humanity. Refugee resettlement in the United States, another policy for which Thames advocates, has come to a screeching halt in recent months.

As I read the final chapter, "New Approaches for New Results," I couldn't help but remember the Arab proverb, "To whom are you reading your psalms, David?" Is anyone listening? The current political climate in Washington, DC, is anything but favorable to the weighty reforms Thames proposes.

However, given the turbulence of the current political moment, Thames may have emerged as a much-needed prophet, albeit unintentionally.

Thames' personal journey is unique, set against a geopolitical backdrop that may, unfortunately, be singular in history. Thames played a pivotal role in initiating the first International Religious Freedom Ministerial, and his influence within US foreign policy and at the United Nations has been significant. Religious freedom advocates, civil society leaders, aspiring civil servants, and educational institutions will find in Thames' book and journey invaluable information and insights that complement their knowledge and enhance their strategies in support of religious freedom for all.

Notably, he adopts a principled approach to religious freedom advocacy, critiquing countries based on facts – including US allies such as India, Pakistan and Egypt – rather than limiting his criticism to the usual targets of US foreign policy such as China, Iran, and North Korea. His chapter "Tyrannical Democracy" is a refreshing read and serves as a warning of the direction any democracy can take if left unchecked. And he emphasizes repeatedly some of the difficulties and failures the United States has experienced in upholding standards of religious freedom and human rights. Thames does omit what I considered the largest recent US foreign-policy failure, one that decimated Middle Eastern Christians and laid the foundations for ISIS: the 2003 war on Iraq.

Throughout the book, Thames provides examples of successful advocacy for religious freedom, illustrating how governments have yielded to such pressure, at least temporarily, and how leadership and commitment can effect change. These examples should inspire all advocates for religious freedom, who often wait years to see the fruits of their labor.

The book offers a more practical approach to understanding the full scope of the right to freedom of religion or belief than a traditional scholarly textbook, featuring real-world examples of advocacy for the right to worship, the registration of places of worship, freedom from arbitrary detention, and the right to convert.

Thames explains the advocacy tools at our disposal and how to utilize them, and he also highlights the international platforms and forums with which we

must engage. The book further emphasizes the efforts of scholars, diplomats, politicians, religious leaders, civil servants, and civil society leaders who have tirelessly supported religious freedom, many of whom I have had the privilege to meet and work with. It was most encouraging to read of the courageous efforts of indigenous leaders from minority religious groups (including Shahbaz Bhatti from Pakistan, and Haider Elias and Ashur Eskrya from Iraq) and of secular civil society groups (such as EIPR in Egypt) whose work Thames supported.

At the heart of *Ending Persecution* lies its most important lesson: the need for quality leadership. Knox Thames exemplifies principled ethical leadership committed to the dignity and rights of all individuals. His book calls every person of faith to recognize both the opportunities available and the challenges that can be overcome. Their leadership can effect real change in support of religious freedom for everyone. Despite the new direction the United States is taking, diplomacy, human connection, friendship, and principles can still make a meaningful difference.

Wissam al-Saliby, President, 21Wilberforce

Towards A New Christian Political Realism: The Amsterdam School of Philosophy and the Role of Religion in International Relations

Simon Polinder

Milton Park/ New York: Routledge, 2024, 236 pp., ISBN 978-1032612515, €175 (hardcover)

"I never discuss anything else except politics and religion. There is nothing else to discuss." This quotation, often ascribed to G. K. Chesterton, captures how many Christian academics feel about these two subjects. It would be remiss to study politics without taking religion seriously (and vice versa) because human beings are fundamentally worshipping beings as if we have idol factories for hearts, to use John Calvin's phrase.

Within Simon Polinder's *Towards a New Christian Political Realism* lies a flavour of Chesterton's bold claim. From the realist forefathers of international relations (IR) to contemporary critical perspectives in the field, IR scholars have not always done a good job of understanding how we humans, religious or not, are zealots at our core.

To improve this academic conversation, Polinder presents two compelling analytical arguments. First, he contends, mainstream IR theory is unequipped to understand religion because the field is built on presumptions against religion's importance and ubiquity. Inspired by a Hobbesian interpretation of the post-1648

state system, the dominant assumption among IR scholars is that religion was to "be separated from, and then subordinated to, the affairs of the state" (36). Matters like religion and spirituality, then, should not function as important variables in political life. Contrary to popular belief, this state system reconfigured religion's place in society and opened the door to religious freedom.

Expecting a religious decline, mainstream IR scholars who held this Hobbesian worldview were caught off guard during the 1979 Islamic revolution in Iran and the 9/11 attacks. Beyond Tehran and New York, a cursory overview of the 20th and 21st centuries reveals how religion has saturated the international political arena: the rise of religious nationalist parties in Egypt and India in the 1960s, the Holy See's global reach since the Second Vatican Council, growing evangelical influence in American politics in the 1980s, and Putin's weaponization of the Russian Orthodox Church in his fight against Ukraine. Religion is also at the foundation of ethical criteria such as just war, core documents such as the Universal Declaration on Human Rights, and concepts like egalitarianism.

Second, Polinder argues, the IR field would benefit from a "new Christian realism." His proposed building blocks for this framework start with an analysis of Hans Morgenthau and Kenneth Waltz's realism. Here, he demonstrates that realism ought not to be associated with cold-hearted amoral thinking, given its astonishing religious roots. Morgenthau described secular ideologies like Nazism and Marxism as having religious features, appreciated certain forms of religiosity (e.g., Quakerism), and acknowledged Christianity's influence on modern humanitarianism. Waltz too defended ideas that could be viewed as Augustinian concepts painted with secularized language. Paraphrasing Waltz, Polinder writes, "perfect earthly justice is impossible, [...] it is about the approximation of a little more justice or freedom" (141). Put differently, according to the neorealist playbook, the City of God is unattainable, but it can still be reflected in the City of Man. Combined with the Amsterdam School, the new Christian realism accepts religion as a feature of reality and asserts that all humans possess something akin to it: a worldview. In other words, every person, group, and nation has a telos (an ultimate purpose or anchor of trust). Thus, Polinder's chief suggestion for IR theorists and practitioners is one of reflexivity: "One need not talk like a theologian but one should recognize that political-theological considerations and worldviews play a role [in their own starting points]" (207).

Polinder's work is distinguished by extensive research and its accessibility to the average student of international relations. Though he makes unequivocal claims about religion's ongoing relevance in the international arena, he writes with intellectual humility – a willingness both to challenge his own side (the religionists) and glean insights from opposing perspectives. And despite the Am-

sterdam School's Protestant roots, its lexicon is useful for those of other religions, given that "sin," "proximate justice," and "creational norms" are concepts found across other theologies and mainstream religions.

This work, however, might have functioned better as two separate books, one investigating the religious side of realism and the other dealing with how the Amsterdam School can contribute meaningfully to IR analysis. The first half of the book, after all, argues that Westphalianism ignores religion, whereas the second half indicates that Westphalians like Morgenthau actually took religion seriously. Also, while the book expresses confidence that new theories can generate new policies, the reader may still wonder how factoring in religion within IR can practically address the weighty injustices we face today.

Nevertheless, at a time when religious beliefs and symbols are invoked in the most consequential conflicts of our lifetime (Russia-Ukraine, Israel-Palestine, India-Pakistan), this book effectively urges IR students and scholars to further investigate the intersection of worship and power. What is typically held as common sense in IR is flipped on its head: political realists do care about religion, the IR field was wrong about the post-1648 state system, and religion matters much more than we are often inclined to think.

Ian DeJong, MA in Global Politics, McMaster University

Equal and Inalienable Rights: Essays on the Universal Declaration of Human Rights

Melanie R. Bueckert and Derek B. M. Ross, editors

Toronto: LexisNexis Canada, 2024, pp. 407 + 44, ISBN 978-0433533801, $145 CDN

This book resulted from a symposium in 2023 celebrating the 75th anniversary of the Universal Declaration of Human Rights. The focus is on how the UDHR has influenced, or could influence, Canadian human rights law. As with many such books, some chapters are gems, while others barely relate to the theme.

Among the gems, the last two chapters, on two of the men involved in drafting the UDHR, are outstanding. A. J. Hobbins, the literary executor of John Peters Humphrey, provides a short chapter on Humphrey's writing of the first draft of the UDHR. The chapter includes many details on the formation of the Human Rights Commission and the drafting committee that formulated the UDHR. Habib C. Malik, son of Charles Malik, a key figure on the drafting committee, contributes a stellar chapter summarizing his father's involvement in the wording of the UDHR and the negotiations leading to its adoption on 10 December 1948. Together, these two chapters soundly refute the argument that the UDHR is a product of Western thinking that does not represent the views of other parts of the world.

William A. Schabas and Ryan Alford's chapters offer helpful buttresses as the international human rights system continually faces challenges. Schabas, a highly respected international legal expert who published the three-volume set of the travaux préparatoires, the drafting history, of the UDHR, identifies contributions from the Majority World, particularly the Haitian delegation. Alford's chapter, titled "The Enduring Significance of the UDHR's Characterization of Rights as Inherent and Inalienable," discusses the arguments used by the USSR to undermine the understanding of individual human rights. Yet the universality of the UDHR, along with the Soviet agreement to uphold its human rights commitments in the Helsinki Accords, ultimately empowered Vaclav Havel and other dissidents to play a role in the USSR's downfall.

Other chapters examine particular aspects of the UDHR and their application in Canadian law. Some of these have more universal application to other contexts. Both Blair Major and Tersha F. De Koning present excellent elucidations of the concept of human dignity. Major discusses human dignity in relation to religious freedom; de Koning identifies the Judeo-Christian roots of human dignity in relation to cruel and unusual treatment and torture.

The book's first part focuses on freedom of religion or belief (FoRB). In addition to Major's chapter, Farrah Raza, a lecturer from Pembroke College at Oxford University, considers the challenges of defining FoRB and elucidates the multiple interpretations. Christopher Mainella and Melanie R. Bueckert discuss religious freedom in Canada, identifying the lack of consistency in interpretation of this important freedom.

Dwight Newman's chapter on collective rights, though not in Part I, is also relevant to the interpretation of FoRB. Newman published a seminal book, *Community and Collective Rights*, on this subject in 2011, and his chapter draws on the theoretical framework developed therein. Newman also draws extensively on the travaux to illustrate his argument that the UDHR can be interpreted to support collective dimensions of rights.

One of co-editor Derek Ross's two chapters may seem esoteric to those outside Canada as it focuses on equal access to public service. However, the province of Quebec has passed legislation banning the wearing of religious dress or symbols by many public-sector workers and limiting religious dress for individuals accessing public services. This legislation, known as Bill 21, invokes the "notwithstanding clause," insulating it from review under the Canadian Charter of Rights and Freedoms. Ross looks to the UDHR for support of his claim that the legislation violates international human rights standards.

Ross's second chapter identifies the family as a community deserving human rights protection. While the UDHR provides certain guarantees to the family and to

parents, the Canadian Charter is silent on human rights of the family. Ross notes that Canadian law functions "as a mediating force between family members … more so than a mechanism to generally protect the family's integrity as a whole" (284-285).

A few chapters are somewhat disappointing. While the participation of a former Supreme Court of Canada justice is almost always desirable, the chapter contributed by the Hon. Michel Bastarache is wrong-headed. The title indicates that it addresses the UDHR and the recognition of social rights. But the chapter addresses the International Covenant on Civil and Political Rights while neglecting the International Covenant on Economic, Social and Cultural Rights. The latter includes social rights.

The chapter by Peter D. Lauwers, a justice of the Ontario Court of Appeal, and Eric Fleming should also have been left for another book. The first paragraph indicates that the authors were asked to address the link between free speech and human dignity in the UDHR. However, they instead wrote about judicial reasoning and moral philosophy. This is interesting material but unrelated to the topic of this volume.

The chapter on freedom of thought, contributed by Marcus Moore, is interesting in this era of disinformation, propaganda, censorship and artificial intelligence. However, at 60 pages in length, it reads more like a master's thesis than a book chapter. If you have a strong interest in this topic, you will find a thorough exploration of it here.

The book offers much of value to international human rights theorists and practitioners alike. As the symposium was organized by the Christian Legal Fellowship in Canada, it is not surprising that this volume includes a significant focus on FoRB and other issues of interest to religious communities, or that it addresses critiques of the international human rights system itself.

Prof Dr Janet Epp Buckingham, Professor Emerita, Trinity Western University, Director, WEA Office to the United Nations in Geneva

Religious Freedom and Covid-19: A European Perspective

Edited by Jelle Creemers and Tatiana Kopaleishvili

London and New York: Routledge 2025, 232 pp., ISBN 9781032326900, € 140.00 hardback, € 41.59 eBook

The COVID-19 pandemic, the worst global health crisis since World War II, posed severe challenges to the enjoyment of human rights, including the right to freedom of religion or belief (FoRB). This book offers a valuable analysis of the impact that emergency has had on the exercise of religious freedom in Europe. Member states of the Council of Europe, bound to respect for the same standards of FoRB

protection, had to find proportionate ways to limit this right in the pursuit of the legitimate aim of protection of health, which had been very seldom invoked since the entry into force of the European Convention on Human Rights. Social groups, including religious denominations and belief organizations, were called to a great responsibility insofar as they could use their influence to encourage either virtuous or vicious behavior on the part of their members. Individuals were forced dramatically to choose between respect for secular measures limiting their right to FoRB and obedience to religious norms that prescribed acts involving propinquity, such as burials.

The book's focus on a specific crisis has not prevented the contributors from addressing broader questions in terms of the balance between competing but equally legitimate interests, for which reason this volume will not become outdated soon. As the revealing title of the editors' introduction states, "Never let a good crisis go to waste." Setting aside the different context from which this phrase originated, this book stands as a significant contribution to the debate on the lessons learned from the global crisis that can hopefully be applied in future emergencies.

The book derives from a project of the Institute for the Study of Freedom of Religion or Belief (ISFORB) at the Evangelische Theologische Faculteit in Leuven, Belgium. Along with chapters written by members of ISFORB, it incorporates perspectives of authors from other backgrounds. One merit of the volume is its multidisciplinary approach, as highlighted by the presence of contributions by sociologists, theologians, legal scholars and historians, among others. The insights offered are not exhaustive (and it could not have been otherwise), but comprehensive: the first part centers on theoretical perspectives, while the second part presents case studies on practical aspects of management of the health crisis.

The first part, devoted to European values, norms and policies, includes a comparison between US and European approaches to pandemic management, an accurate legal analysis of the impact of COVID-19 on the manifestation of FoRB in Europe, and an assessment of religion-based conscientious objection to mandatory vaccinations. The chapter comparing the Belgian and Dutch approaches is among the most original. Its relevance lies not so much in its evaluation of the particular policies implemented by the two states as in the broader focus adopted by the authors, which goes beyond religion as a specific legal category and instead emphasizes human dignity. While their criticism of the special treatment of religion may be questioned by other scholars, it certainly offers much food for thought.

The second part is well-structured. Space restrictions have necessarily limited the number of case studies that could be included, but the editors have expertly selected four varied perspectives on the management of FoRB-related challeng-

es. These present the points of view of the state (as in the chapter on Belgium), society (whose internal tensions are examined with regard to Orthodox Georgia), new religious movements (the specific national context is Ukraine) and an established church (the Church of England, which collaborated with the state in the lockdown). None of the chapters is limited to a single perspective, and common themes pervade all these contributions. Nevertheless, the choice of such a structure successfully transmits the complexity and variety of existing situations to the reader.

The interesting perspectives and balanced structure of this book make it a highly recommended resource for scholars as well as practitioners, political, religious, and societal actors.

Dr Rossella Bottoni, Associate Professor of Law and Religion, Faculty of Law, University of Trento

The Non-Religious and the State: Seculars Crafting Their Lives in Different Frameworks from the Age of Revolution to the Current Day

Jeffrey Tyssens, Niels De Nutte and Stefan Schröder (eds.)

Berlin/Boston: Walter de Gruyter, 2025, iv + 397 pp., ISBN 978-3111337012, €64.95 (hardcover)

This edited volume is the result of a 2022 international conference of the Secular Studies Association Brussels research group (SSAB) at the Vrije Universiteit Brussel (VUB). The introductory chapter explains that the volume as a whole calls for attention to diversity in thinking about both "the non-religious/secular/humanists/nones" and about "the state," which knows multiple localities and levels of "public authority." Particular attention is devoted to the roles and frameworks of a variety of individuals, rather than organizations or other usual suspects. Tyssens and de Nutte make a helpful distinction between actors with a "protest identity" (such as atheism) and those with a "project identity" (humanism). This differentiation could also be very helpful in typologies of other (non-)religious individuals and societal actors. Finally, while the volume pays attention to different time frames since "the age of Revolution," the primary focus is on present-day situations.

The book contains 18 contributions by both established and younger researchers, including varying but all very helpful case studies demonstrating the diversity of seculars and their contexts. Although Belgium and Europe more broadly receive (not surprisingly) much attention, the contributions also discuss the United States, Ghana, Brazil, Mexico and the Middle East. The chapters are country-specific or comparative, and the authors come from a variety of disciplinary

backgrounds, including (but not limited to) historical studies, socio-anthropology, law and political science. Below, I highlight three chapters that especially caught my attention.

To the IJRF reader who wants to understand better the importance, complexities and structural challenges related to freedom of religion or belief (FoRB) in everyday life, I strongly recommend Joseph Blankholm's contribution. Based on interviews with non-religious women in the US and scholarly literature, Blankholm convincingly explains how non-religious women are particularly challenged to live their everyday life in American civil society with its Protestant imprint. The growing role of religious non-profit organizations in the neo-liberal sociopolitical framework turns Christian religious communities into strong social powers. In combination with a pervasive social patriarchy, however, this situation disadvantages non-religious women who are looking for sympathetic local service providers for life-cycle rituals, ethical education for their children, or a social safety net. As a result, many of these women have become reluctant to express their non-religion openly.

Sofia Nikitaki offers insights from her analysis of in-depth interviews of non-religious millennials in Belgium (Flanders), Greece and Norway. Interestingly, the interviewees largely agreed in their general understanding and appreciation of "religion," but Belgian and Norwegian appreciations of church-state relations differed greatly from the Greek perspective. The sociopolitical influence of the country's majority church was found to be decisive for respondents' evaluation of church-state relations, with Greeks showing higher levels of frustration regarding the Greek Orthodox Church. Nikitaki connects her findings with earlier research, such as that of Petra Klug, who argues that indifferent people particularly criticize religion when it infringes on their own or other people's lives. In conclusion, Nikitaki notes that "there is no such thing as a monolithic 'European secularity,'" and she calls for attention to contextual differences, in line with the publication's overall aim.

Katharina Neef describes the decline of German organized freethought in the 20th century. The century started quite well for this group, with strong growth between 1914 and 1928, including a shift in membership from white-collar to blue-collar participation. Growing Marxist sympathies led, however, to the abolition of associations and activities in 1933 and to outright Nazi persecution. After World War II, neither the (religion-friendly) Federal Republic of Germany nor the (atheistic) German Democratic Republic offered fertile ground for the revival of freethought. In the FRG, the remaining freethinkers remained potential suspects of communism and they suffered from brain drain to the east. In the de-religionised GDR, there was limited space for alternative forms of sociability and more

interest in promoting a scientific worldview than in anti-religious discourse. Neef argues against direct and universal causal relations between secularization and the blooming of organized irreligion.

Some chapters in this volume demonstrate more academic rigor or more original insights than others. Yet overall, the volume achieves its aims and makes a valuable contribution to the study of its chosen topic – which is not always the case with collected volumes based on conferences.

Prof Dr Jelle Creemers, Evangelische Theologische Faculteit, Leuven (Belgium)

Compact Atlas of Global Christianity

Kenneth R. Ross, Gina A. Zurlo and Todd M. Johnson (eds.)

Edinburgh: Edinburgh University Press, 2025, 432 pp., ISBN 978-1399550079, US $200

The *Compact Atlas of Global Christianity* represents the capstone of the 10-volume series Edinburgh Companions to Global Christianity (2017-2025). Whereas the earlier nine volumes were organized around geographic regions, this concluding work provides a synthetic and global perspective, offering readers a comprehensive overview of world Christianity in the early 21st century. The scale of this undertaking is impressive: 261 color graphs, 98 charts, 131 maps, and contributions from 28 authors.

The book also updates and expands upon the earlier *Atlas of Global Christianity* (2009) by Todd Johnson and Kenneth Ross. One key difference is in scope: while the 2009 atlas emphasized historical trajectories alongside demographic patterns, the new *Compact Atlas* foregrounds the present realities of global Christianity with a contemporary, data-driven focus. The editorial team has evolved as well, now including Gina Zurlo alongside Ross and Johnson as co-editor. The demographic data underpinning this volume come from the Center for the Study of Global Christianity, an academic research center based at Gordon-Conwell Theological Seminary in Hamilton, Massachusetts where Johnson and Zurlo work. This institutional context ensures both continuity and reliability in the presentation of demographic trends.

The table of contents reveals a tripartite structure: continents and regions, ecclesial traditions, and thematic explorations. Each continent is analyzed with maps and charts, including innovative visualizations such as “North Africa as 100 Christians” or “Europe as 100 Christians,” which enable readers to grasp proportional realities at a glance. These visualizations break down the Christian population not only by continent and region, but also by ecclesial tradition, language, age, and many other topics, making demographic realities readily perceptible and memorable.

The section on Christian traditions differentiates four broad ecclesial families – Catholic, Orthodox, Protestant (including Anglicans), and Independents – while also tracing two major global movements: Evangelicalism and Pentecostal/Charismatic Christianity. An additional layer of analysis covers "Christian families," such as Baptists, Lutherans, Reformed Presbyterians, hidden or cell churches, and other Christian groupings. Each Christian tradition is described by "critical insiders" (viii), that is, scholars who personally identify with the tradition they analyze.

The thematic chapters address 10 cross-cutting issues: faith and culture, theology, worship and spirituality, social and political contexts, mission and evangelism, gender, religious freedom, inter-religious relations, migration, and climate change. The first eight of these themes recurred across the earlier nine volumes of the series, but the editors have now added migration and climate change as new topics of growing importance.

The conclusion offers reflections on the "Future of Global Christianity" (262ff.), with projections up to 2075 indicating that the numerical center of gravity of world Christianity may continue to shift decisively to the Majority World, particularly Africa (also 11). The authors propose that the Democratic Republic of Congo or Nigeria could eventually surpass the United States as the country with the largest Christian population. Appendices, including a comprehensive one on "Religion by Region" (370ff.), round out the volume.

Compared to similar works, the *Compact Atlas of Global Christianity* distinguishes itself through several features. First, it is not primarily historical but contemporary, offering data for 2025 rather than a retrospective narrative. Second, it is not confined to regional perspectives but seeks a genuine global synthesis. Third, it benefits from local authorship, thereby incorporating voices from the regions under analysis. As the editors themselves note, "While resting on preceding scholarship, this volume breaks new ground through its genre as an atlas, its reliable demographic analysis, its contemporary focus, the local authorship of its essays, and the originality of the analyses" (ix). The result is a hybrid reference work – neither a standard demographic report nor a traditional historical survey, but a visually engaging, research-based atlas of contemporary Christianity.

Among the thematic contributions, the chapter on religious freedom (320ff.), authored by Elizabeth Lane Miller and Helene Fisher, deserves special mention in the context of this journal. The chapter presents visual data on global restrictions, including a "religious freedom index," maps of "governmental restrictions," a "social hostilities index," and statistics on Christian martyrs by decade from 1900 to 2020. Particularly valuable is the attempt to correlate martyrdom with ecclesial traditions and to identify major perpetrators of persecution. These empirical tools provide researchers and practitioners with both comparative in-

sight and concrete evidence, underscoring the relevance of the atlas for ongoing discourse in religious freedom studies.

The atlas also illustrates wider structural shifts in global Christianity. It highlights the southward shift of Christianity's demographic center. Whereas in 1900, 82 percent of Christians lived in the Global North, by 2025 the proportion is described as 31 percent, projected to decline further to only 17 percent by 2075. In line with this trajectory, the editors emphasize their intention to "prioritize voices that have been historically marginalized" (7), thereby reflecting the lived realities of world Christianity.

As the concluding volume of the Edinburgh Companions to Global Christianity, this book succeeds in providing both a synthesis and a fresh agenda for research. Its combination of reliable demographic data, thematic exploration, and accessible visualizations make it a unique resource for scholars, practitioners, and policymakers alike. For those particularly interested in religious freedom, the atlas offers a balanced mix of statistical evidence and interpretive commentary that will enrich both academic study and advocacy. At the same time, some questions remain open for reflection. The classification of Christian traditions, while necessary for clarity, inevitably simplifies complex and hybrid identities, particularly in rapidly evolving regions (cf. methodological reflections on 385ff.). Likewise, quantitative indicators such as martyrdom counts or religious freedom indices provide valuable insight but require careful interpretation, as they rely on contested definitions. Future work might explore how more granular qualitative analysis or local narratives could complement these metrics, offering an even richer understanding of global Christianity's dynamics. Together with the nine regional companions, the *Compact Atlas of Global Christianity* forms a landmark achievement in the study of world Christianity, while also inviting ongoing dialogue about methodology and interpretation in this rapidly changing field.

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On the Dignity of Society: Catholic Social Teaching and Natural Law

F. Russell Hittinger (edited by Scott J. Roninger)
Washington, D.C.: Catholic University of America Press, 2024, 421 pp., ISBN 978-0813238517 $75.00 US (paperback)

This book is divided into three main parts: Catholic social teaching, natural law, and "first truths." In the first part, Hittinger refers to an interest in the social

virtues of charity and justice by which a person can be right with God and neighbour. This includes being rightly ordered within a community and how especially the popes, since the 18th century, have contributed to insights in this regard. The basic principles of Catholic social doctrine are the dignity of the person, solidarity, subsidiarity and the common good (the last three having a social aspect). The dignity of society (including societies other than the state) presupposes the dignity of the individual and the existence of social persons distinct in dignity, reducible neither to the individual nor the state. Hittinger points to the distinction between subsidiarity and other models that view civil society as an important facet of society, and it accentuates an anthropological understanding of the societal aspect as well as the Church, which relates to the imago Dei as well as the imago Christi.

From the late 18th century to the late 20th century, the inaugural encyclical of every pope confronted the problem of the state as part of coming to come to terms with the new state-making regimes that emerged after the Napoleonic Wars. Consequently, a concerted effort was made to call attention to the importance of social pluralism, which included a defence of civil society.

The onslaught of the sexual and moral revolution beginning in the 1960s resulted in Pope John Paul II's Humanae Vitae, which aimed to defend marriage and family. According to John Paul, the crisis of the 20th century was anthropological, in that the spirit of the times was not merely in opposition to institutions. Rather, it was essentially an affirmation of what man was not – in other words, that the family and marriage, as well as the political and ecclesial realms, were not viewed as the perfection of nature but rather as platforms for self-revision. Pope Leo XIII (who focused on where we stand regarding these realms) framed the revival of Christian philosophy and developed the idea of participated authority, which is similar to Abraham Kuyper's ideas on sphere sovereignty. In this regard, social spheres such as the family or religious associations do not owe their existence to the state. In contrast, the state should preserve these communities and not become involved in their peculiar concerns and organisation. These insights were also developed by Pope Pius XI (to whom the teachings on subsidiarity, also as a derivative of social justice, are attributed).

In the book's second main part, Hittinger focuses on natural law, including related teachings emanating from the relevant papal encyclicals. Here one is reminded of the irrepressibility and eternal return of this topic. We do not need a specific command regarding the ends of being, living and knowing, because these enjoy our natural assent and obligation in natural law, which is not qualified unless the natural law exists in a prior state that is ultimate in the order of discovery. This in turn denotes an aspect of God. As Hittinger comments, "Once we

see the need to appeal to some standard of action other than those rules posited by the human mind, we are poised to ask questions about first things." Pope John Paul XXIII's Pacem in Terris, which Hittinger describes as "the first papal encyclical to treat natural law in general terms for a general audience and, even more significantly, for the express purpose of instigating collaboration along a wide front of moral, social and political issues," receives considerable attention, and Hittinger also elaborates on John Paul II's contribution to social doctrine vis-à-vis anthropology, against the background of the imago Dei. Dignitatis Humanae's contribution to developing the doctrine of recent popes on the inviolable rights of the human person and the constitutional order of society is also presented, including the importance of protecting religious associations and families as well as a moral-juridical teaching on the natural-law source of religious acts.

The third and final part of the book, "First Truths," offers valuable insights into how the Church should be understood. It is argued that the Church should be associated with the governance of souls, an area in which political powers have no share. This discussion covers references by Pius XII to the distinction between the polity (populus) and ecclesia (Holy Spirit), which differ in their respective origin and end. In this regard, Leo XIII referred to the "faith embodied in the conscience of peoples rather than restoration of medieval institutions as the way to final victory." Jesus inaugurated a non-political messianic kingdom, which entailed a separation of the religious from the political. Hittinger further elaborates on the meaning of this "separation" and points to the neglect by Christians of the fundamental theme in the Bible, stating that "we need to aim towards the city which is to come and not the one we find ourselves in." This implies the supernatural presence here and now, in history, of the ultimate reality of the kingdom of God, which will be consummated upon Christ's return.

Hittinger concludes with a chapter on the significance of Pope Benedict's teachings on how to live during very challenging times. It is important in this regard to avoid concentrating on worldly success; rather, one must pursue "human success" by perceiving what makes life worth enduring – which includes a life of prayer, labour and rest.

Dignity of Society (which is comprised of a selection of Hittinger's previously published scholarship) brings together Hittinger's thought on the Catholic Church's teaching on moral and social philosophy as well as theology, including in particular the insightful and foundational thinking of Augustine and Thomas Aquinas. Hittinger writes against the background of the Enlightenment's bolstering not just of reason and individuality, but also of the idea of the state, something that the Catholic Church was compelled, by means of its social theory, to address. Dignity of Society also contributes to discourse on the challenges related to the

plurality present in liberal democracies, by elaborating on the idea of subsidiarity. Related to this, the common good implies the protection of the common goods of societal entities (as well as the participation of societal entities in a social order), as well as an understanding of man as essentially a relational being (as opposed to the distorted view of individualism) and that man is not only a citizen. Dignity of Society presents insights into natural law, anthropology, solidarity, subsidiarity, social justice, structured pluralism, human rights (including freedom of religion), political theory, the importance of the individual, the Church and God's Kingdom, and how all of these are interconnected with one another.

I expect that this work will be frequently cited in the years to come, in discussions of Christian social theory, natural law, freedom of religion, and the intersection between law, religion and the state. Dictatorial regimes and the ever-increasing encroachment upon religious rights and freedoms in democracies around the world – or, to put it more generally, the reality of sin in this world – will ensure the ongoing importance and relevance of this book.

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Guidelines for authors

This document combines essential elements of the editorial policy and the house style of IJRF which can be viewed on www.ijrf.org.

Aims of the journal

The IJRF aims to provide a platform for scholarly discourse on religious freedom in general and the persecution of Christians in particular. The term persecution is understood broadly and inclusively by the editors. The IJRF is an interdisciplinary, international, peer reviewed journal, serving the dissemination of new research on religious freedom and is envisaged to become a premier publishing location for research articles, documentation, book reviews, academic news and other relevant items on the issue.

Editorial policy

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understood broadly and inclusively by the editors of IJRF, but these terms clearly do not include everything.

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special connection to the topic, choice of British or American English, date of submission, contact details including e-mail address.

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3. Graphics and Tables: These must be attached as separate files. Indicate in red where they should go in the text. Every effort will be made to place them in that spot.
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