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FRENCH EXCEPTIONALISM: THE IMPACT OF LAICITE

A Thesis

By Rachel B. Culp

This thesis is presented in partial fulfillment of the requirements for the Degree of Bachelor of Arts in International Studies at the Croft Institute of International Studies and Sally McDonnell Barksdale Honors College at the University of Mississippi.

University, Mississippi  
May, 2020

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## ABSTRACT

This thesis explores the impact of citizens' attitudes toward religious freedom on their attitudes toward four socio-political issues: abortion, same-sex marriage, importance of Christianity to nationality and whether Islam is viewed as incompatible with nationality in a Western European context. I focused specifically on France, Germany and the UK as these countries represent three distinct approaches to the separation of religion and government. I aim to isolate and investigate the impact of the concept of *laïcité*, the French interpretation of secularism, and see if *laïcité* and attitudes toward *laïcité* impact citizens' attitudes differently toward socio-political issues. My research found that *laïcité* does have a differential impact on attitudes toward abortion, importance of Christianity, and compatibility of Islam. The effect on same-sex marriage was not statistically different in France relative to Germany and the UK. Overall, this research shows that *laïcité* does have a different impact on attitudes in France with respect to three socio-political issues and aims to further investigate the notion of Islam's compatibility, or incompatibility in Western European countries with freedom of religion for all citizens.

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## *Introduction*

### **Religious Freedom**

Religious freedom is a contested and difficult term to define. The *Bouvier Law Dictionary* defines freedom of religion as, “the freedom to practice or change one’s own religion or not to believe in or practice a religion at all” (Bouvier Law Dictionary). This definition comes closest to addressing the current debate of what freedom of religion encompasses, including debates about the wording and usage of “freedom *of* religion,” “freedom *for* religion” and “freedom *from* religion” (Sharffs, Moaz, and Wooley, 2019). Based on the literature presented by religious freedom scholars in “Religious Freedom and the Law: Emerging Contexts,” I will use the definition of *freedom of religion*. I begin with an examination of Western European countries and how they have chosen to allow religion, restrict religion, and manage religion, thus encompassing the idea of both freedom for and freedom from religion in the concept of *freedom of religion*.

James Richardson argues in his research that religious freedom is socially constructed, which is what makes it so difficult to define and understand (Richardson, 2015). He cites the notion that “some religiously pluralistic societies are being called on to ‘manage’ or ‘regulate’ religion, a development that by definition places limits on religious freedom” (Richardson, 2015). Governments justify the management of religious freedom in an effort to maintain peaceful coexistence of religious groups.

In my research, I will provide an overview of how different countries have chosen to address freedom of religion and management of established religious institutions. Having described the relationship between government and religion in these countries, I will then examine the possible impact of these different context on attitudes toward social and political

issues. Specifically, I will be using data from Pew Research Center's 2017 study, "Being Christian in Western Europe," to examine the impact of citizens' attitudes toward separation of religion and government on the following issues: women's reproductive rights, specifically the legalization of abortion; same-sex marriage legalization; attitudes toward Christianity as an important part of national identity; and whether or not Islam is viewed as incompatible with national identity. My approach will be to compare attitudes in France, Germany and the UK in order to isolate hypothesized contextual effects that suggest the impact of attitudes toward separation of religion and government will be different in France, due to the effects of the concept of *laïcité*.

Although I analyze data from Western European countries, the majority of literature discussing freedom of religion begins with a focus on the United States and the First Amendment, which changed pre-existing understandings of freedom of religion and its application. Prior to the First Amendment, freedom of religion reflected a system in which the church and state "were two interrelated institutions that jointly governed society; the society was monolithic just as the state was" (Shariffs, Moaz, and Wooley, 2019). Schariffs, Moaz and Wooley cite Michael Novak and his argument that the First Amendment of the US changed previous interpretations of freedom of religion because it actually prohibits Congress from making any law that "protected an established religion" (Sharffs, Moaz, and Wooley, 2019). Alfred Stepan in his research, however, challenges Novak's understanding of freedom of religion when he notes the First Amendment only prohibits Congress as a whole from establishing one official religion. Each of the thirteen colonies was in fact able to have their own established religions (Stepan, 2000). Stepan makes this clarification because he believes the "strong" wall of separation between church and state considered to be prevalent in most Western civilizations, of



which the US is a prime example, is actually a misinterpretation of freedom of religion itself. Stepan coins the phrase “twin tolerations,” referring specifically to religious authority and political institutions, for his debate about whether or not religious freedom must be intact in order for a country to be considered a democracy. His research concludes that the “lesson from Western Europe, therefore, lies not in the need for a “wall of separation” between church and state but in the constant political construction and reconstruction of the ‘twin tolerations’”(Stepan, 2000). Therefore, while it is clear from the literature that the US and its Constitution changed preexisting understandings of religious freedom in Western societies, it is unclear if the US example and its model of a strict separation of church and state is the only viable model for democracies.

The *United Nations 1948 Universal Declaration of Human Rights*, written many years after the First Amendment’s interpretation of religious freedom, attempted to explicitly define freedom of religion. The charter states, “all human beings are born free and equal in dignity and rights” and “everyone has the right to freedom of thought, conscience and religion” (Universal Declaration of Human Rights, 1948). The Universal Declaration emphasizes the universal rights of people and inherently prohibits a government from a totalitarian religious system. While not requiring any society to be democratic, and therefore in line with Stepan’s research that democracy is not the key to freedom of religion, the UN definition of the universal rights of man states that religious freedom is a *requirement* for all human beings.

This notion of freedom of religion has been conceptualized differently in almost every country. My research will focus on Western European countries and their individual conceptualizations of freedom of religion. I am particularly interested in how governments have supported and managed religious freedom, and the impact this “support” for religion, or explicit

non-support, has had on attitudes toward various socio-political issues in these countries. My research will have a particular focus on France and compare France and its interpretation of religious freedom within the Western European context. I will look at the effect France's particular definition of religious freedom has on citizens' attitudes concerning issues that could potentially permeate the notion of a separation between government and religion.

A major characteristic of Western European countries are their emphasis on conceptualizing religious freedom as *secularization*. Western Europe is arguably one of the most prominent regions in which secularization has been a centerpiece of various government policies. Secularization is broadly described as “disassociation or separation from religious or spiritual concerns” (Merriam-Webster Dictionary). Tariq Modood understands secularism to exist when “political authority does not rely on religious authority and the latter does not dominate political authority” (Modood, 2012). Modood emphasizes that this broader definition does not require an absolute separation or a government that is “hostile” to religion. Rather, religion is present, perhaps even in the public sphere in certain Western European countries, although Modood theorizes there is a growing trend toward less public recognition for religion and an emphasis on religion in the private sphere (Modood, 2012).

More specifically, Modood identifies two major ways that secularization has been interpreted within Western Europe. The first way, a concept of moderate secularism that sees organized religion as a potential public good. In this interpretation, the state can in some circumstances assist religion, like through an “established” church such as in the case of England in the UK. The second approach is a much more dramatic approach to secularism. France, for example, “seeks to create a public space in which religion is virtually banished in the name of reason and emancipation, and religious organizations are monitored by the state through

consultative national mechanisms” (Modood, 2012). Modood identifies these two approaches to secularization: the first approach allows for some established religion in the public sphere, and the second approach completely banishes religion from public spaces.

In a policy study, Michael Minkenberg argues there are three basic types of secular distinction in Europe. The first, the state church type, characterized by a close relationship between state power and church existence such as England in which there is a close relationship between state power and the church. The second type is a strict separation between state and church. The third type is a separation somewhere in between the first and second models, in which the idea of separation is modified by some overlap of state and church, resulting in the preservation of particular privileges of prominent churches. France exemplifies the second type, a “separationist” model, and Germany models the third type, a combined philosophy that allows for major churches to be given a prominent role in some government functions. (Minkenberg, 2003). While Modood and Minkenberg disagree on whether there are two or three distinct interpretations of secularism, both agree that France represents a distinct and different case than found in other Western European nations. Using France as a case study for comparison against other Western European countries is essential because it is clear that France represents a particular approach to religious freedom and secularization. My research analyzes explicitly whether or not the distinct approach to freedom of religion that exists in France has an impact on attitudes concerning religious freedom and other issues.

In order to analyze this, I will investigate one country from each of the three categories of secular interpretation in Western Europe Minkenberg notes: France, Germany, and the UK (specifically highlighting England and the influence of the Church of England). My goal will be to highlight attitudinal differences that may emerge due to the differing cultural settings fostered

by varying governmental attitudes toward secularization, especially investigating the hypothesized differential impact in France.

## **France**

France is the only Western European state that is explicitly “secular,” the only Western European state to define itself as regulated by “laïque” principles (Casanova, 2004). The French term “laïcité,” which is used in its Constitution to address religious freedom is best translated to the English term “secularism.” Laïcité is about defining the proper relationship between religion and the state (Gunn, 2004). The term laïcité first appears in the 1946 Constitution and remains in the 1958 Constitution which states, “France is an indivisible, secular, democratic and social republic” (The French Constitution, 1946). The term laïcité, however, allows for many different interpretations given that laïcité, and being “laïque” lacks a precise definition in the French language and French society (Korteweg and Yurdakul, 2014).

The “French Republic,” born out of the French Revolution of 1789, instilled important ideals for the French state, including one key republican ideal that “one becomes a citizen through participation in the public sphere” (Korteweg and Yurdakul, 2014). As Cecile Laborde discusses, in French republicanism the state is central in shaping citizenship and belonging, and belonging to the French nation is predicated on being secular. Laborde notes that the French approach to secularism encompasses “a comprehensive theory of republican citizenship” which centers on three ideals: equality, liberty, and fraternity (Korteweg and Yurdakul, 2014). In Laborde’s interpretation of laïcité, she argues that laïcité is a more tolerant republican ideal. She argues that the French government adheres to a strict form of secularism that renders religious practices largely a private affair. People have a right to be different in private, but that must not inform governmental or public affairs (Korteweg and Yurdakul, 2014). Unlike in Germany or the

Netherlands, in which pluralism has informed national narratives of belonging, the French state promotes an abstract individualism which rejects public expressions of identity-based particularity. Belonging to the state means participating in the public sphere appropriately, and leaving distinct practices and beliefs at home, in the private sphere (Korteweg and Yurdakul, 2014).

France, as noted above, has chosen to address religious freedom with an emphasis on the secular and the neutral. Blendine Chelini-Pont and Nassima Ferchiche continue this discussion of *laïcité*. These authors highlight the impact of *laïcité* on the French identity, noting that *laïcité* as a concept has become a part of the French identity. French citizens consider *laïcité* as inherent to their country and also to what it means to be “French.” It is no longer just an expression of French law, but inextricably tied to socio-cultural issues in France (Chelini-Pont and Ferchiche, 2017). As Tariq Modood notes, France is different from other Western European countries in the way the French government has attempted to banish religion from all public institutions (Modood, 2012). *Laïcité* attempts to “define an ostensibly neutral public sphere in which parochial identity is suppressed in favor of republican universalism” (Modood, 2012). Therefore, *laïcité* interacts with French republicanism to result in limited individual religious expressions in the public “neutral” sphere and a removal of any religious influences on the government. (Korteweg and Yurdakul, 2014).

## **Germany**

Although there exists a national German narrative of homogeneity, Germany is “a historic amalgam” of diverse groups and ethnic groups, as well as two Christian denominations (Korteweg and Yurdakul, 2014). The German Constitution states that religious freedom includes

freedom of belief and freedom to act according to one's beliefs. The Constitution also provides religious freedom for both individuals and collective bodies (Robbers, 2001). Germany, in terms of modern nationhood, was formed later, thus distinct cultural traits for each German nation-state continue to exist. This tradition is reflected in the federal system of governance that Germany has where states are governed by particular political parties that may be opposed to the policies of the federal government (Korteweg and Yurdakul, 2014).

Germany has constitutional provisions in its federal system allowing local communities to decide on the role of religion in education. Germany does not have an established church, but Protestantism and Catholicism are recognized as official religions. German taxpayers, unless they elect to pay a surcharge to their tax bill, a Church tax, do not have the automatic right to be baptized, married, or buried in their denominational church. The vast majority of citizens in the former West Germany do elect to pay the state-collected church tax, because of its ease of convenience in using religiously-run churches and hospitals (Stepan, 2000). In addition, the Protestant Church, the Catholic Church, and the Jewish religious community in Germany all have privileged legal status under German Law. According to the 1949 Constitution, religious associations can acquire the status of public law corporation provided they guarantee continuity with their bylaws and the number of their members, as well as provide clear indications of the members' status (German Constitution, 1949). Islamic groups, however, have been trying to obtain a preferred legal status for their own religious communities since the 1970s, but so far German courts have rejected their petitions. Some German legal experts argue the German Constitution does not require official status, therefore Islam is always officially recognized in Germany, and the issue of various legal status applications is due to Islamic groups not meeting guideline requirements (Korteweg and Yurdakul, 2014).

Overall, Germany has not followed the same path of strict secular neutrality as France. The biggest difference between France and Germany in terms of religious freedom being the federalism that is inherent to German politics. State neutrality means something different for the German states governed by the Christian Democratic Union of Germany (CDU) than it does for a state not run by a religiously-associated political party (Korteweg and Yurdakul, 2014). The CDU has in fact worked to tie German culture and Christian heritage, thus treating Christian symbols as *cultural* ones and allowed in the public sphere of German society. German interpretation of religious freedom has maintained a level of state neutrality, like in France, but Christianity itself has maintained a position of priority and prominence because of its treatment as a historical but not religious component of German culture.

## **UK**

Unlike either France or Germany, England does not have a written Constitution to codify religious freedom laws. The approach in England has been less rights-based toward religion, but tolerance-based (Ooijen, 1980). In contrast to France and Germany, the Anglican Church, or the Church of England, is still formally the established church religion in England (Casanova, 2004). In terms of society, even with a formalized church, England has become increasingly secular, especially in terms of church attendance. Distinct from other Western European countries, immigration policy is based on multiculturalism, particularly when concerning immigrants from former British colonies, rather than assimilation, as has been true in the national narratives of France and Germany (Ooijen, 1980).

The English legal system has never articulated a principle of state neutrality. While generally accepted that the state should remain religiously neutral, there has been an emphasis on

equality over neutrality. As religion has remained unprotected on the legal level, English Courts have focused on the protection of ethnic minorities and discrimination against these minority groups. From the 16th century to today, religion and religious diversity have been increasingly tolerated in England (Ooijen, 1980). While the powers of the established Church have been diminished and more-liberal calls for state neutrality in religion have been growing, the Church's power can still be seen today. Senior Bishops and Archbishops retain forms of leadership in the House of Lords and the Monarch continues to be the official Head of the Church (Ooijen, 1980). Like Germany in some ways, England has chosen to follow a path of inclusion of religion into the public sphere; policies have been implemented to increase religious minorities' inclusion and the Church retains its establishment.

While explicit state neutrality and secularism do not exist in England in the same way they do in France, legally-speaking England state neutrality is "implicitly assumed through the principle of the rule of law and equality before the law" (Ooijen, 1980). England is not formally neutral the way France is, but religious freedom in England has been conceptualized to emphasize religious equality and diversity in the public sphere instead of a complete separation between church and state.

## **Summary**

It is clear that religious freedom exists to some extent in France, Germany, and the UK (England). It is also clear that these three Western European states have conceptualized either religious freedom or secular state neutrality in distinct ways. France has chosen to follow a path of strict separation, excluding the influence of religion in government. Germany has followed a path of accommodation, allowing religion and specific churches to have places of power and



influence, as long as they continue to abide by certain constitutional restraints. Germany has therefore allowed for religion to exist in the public sphere, giving Christianity (and Judaism to some extent) a large role in the public sphere. Finally, England continues to have an established church, making it inherently non-secular. In practice, however, England has adopted a policy of inclusion of all religions in the public sphere.

While most Western European countries have religious freedom as a tenet of their governmental structure, each country has chosen a distinct path for its interpretation of religious freedom. As a result, this difference in application of religious freedom will help to establish differing contexts in which country's citizens respond to various socio-political issues. The premise of my research question is to ask: what is the impact of attitudes toward religious freedom in Western Europe, and is the impact of France's distinct concept of religious freedom greater, or somehow different, relative to other Western European countries?

Given the literature cited previously, I will answer this question by utilizing attitudinal data provided by the Pew Research Center and analyzing the impact of attitudes toward religious freedom on attitudes toward other socio-political issues across France, Germany and the UK. I intend to examine the impact of three unique approaches to religious freedom and evaluate how the different approaches to religious freedom are reflected in attitudes in each country with regard to several socio-political issues. I have picked four main issues to evaluate, each one chosen because I believe it is shown to be impacted by the way individuals think about religion and religion's intersection with politics and government. These issues will be: women's reproductive rights, specifically the legalization of abortion; same-sex marriage legalization; attitudes toward Christianity as an important part of national identity; and whether Islam is viewed as incompatible with national identity. I will isolate the impacts in France in order to

measure whether or not the differential impact is significant, thus examining the possibility that attitudes toward religious freedom in France interact in a way that is distinct and different from other Western European countries.

I expect that attitudes toward religious freedom will impact all Western European countries on every issue, but the impact in France will be stronger. The greater hypothesized impact in France will be due to France's concept of *laïcité*, resulting in the conclusion that religious freedom operates differently in France than it does in other Western European countries, thus impacting attitudes differently.

### **Issue 1: Attitudes toward abortion**

Although my research evolved tremendously, the original question behind my research was centered on abortion laws and attitudes, particularly in Western Europe. Abortion is identified as a *morality issue*, meaning in contrast to other “classical policy conflict” issues like economic issues, abortion deals with fundamental social and moral values and includes a more broad question of religious beliefs and personal orientations. (Engeli and Varone 2011). Abortion is a contentious issue in most countries because it addresses core value beliefs of individuals. Therefore, abortion will be a relevant first issue to investigate as attitudes regarding abortion are often centered on individuals' religious beliefs. This tension between a private religious belief and whether or not the private belief impacts the larger public sphere is exactly what my research attempts to measure.

In France, abortion was legalized with the Veil Law in 1975 (France 24, 2014). While some debates did occur within the French state at this time concerning the legalization of abortion, the law was never overturned and abortion quickly became a “settled” issue. Recently,

with Gender Equality Bills passed in 2013, the state now provides full reimbursement for abortions, outlaws any attempt to prevent a woman from accessing information about abortion services, and even removes the legal requirement of “distress” in order to request an abortion (Center for Reproductive Rights, 2014). Although some French citizens may privately disagree with abortion because of the strong Catholic ties in France, it is reasonable to suggest that because of the strong French attitudes toward separation of church and state, private beliefs about abortion are not as impactful in the public sphere as the larger belief in *laïcité*. This allowed for a relatively quick and smooth legalization of abortion and should be reflected in the relationship between *laïcité* and attitudes toward abortion.

Because of Germany’s history of separation and unification, it is more difficult to trace the legalization and criminalization history of abortion there. East Germany legalized abortion in 1974; West Germany also attempted to legalize abortion that same year, but the law was struck down by the Federal Constitutional Court (FCC), which declared that constitutional protections of human life should be extended to “developing life” (Kamenitsa, 2002: 111). Following the FCC decision, West Germany passed legislation in 1976 that did not legalize abortion, but ended penalties for both doctors and patients if certain stringent conditions were met. The requirements included: no abortions performed later than 12 weeks or after 12 weeks only for medical necessity and with counseling, and all abortions had to be signed off by at least 2 physicians (Kamenitsa, 2002: 111).

The 1976 law seemed to “settle” the issue in Germany for a bit, but abortion became a major political debate once again as the reunification of East and West Germany began in the 1990s. In 1992, following lots of public debate, a reunified Germany passed a law which attempted to legalize abortion. Again, the law was struck down by the FCC. Finally, in 1995, an

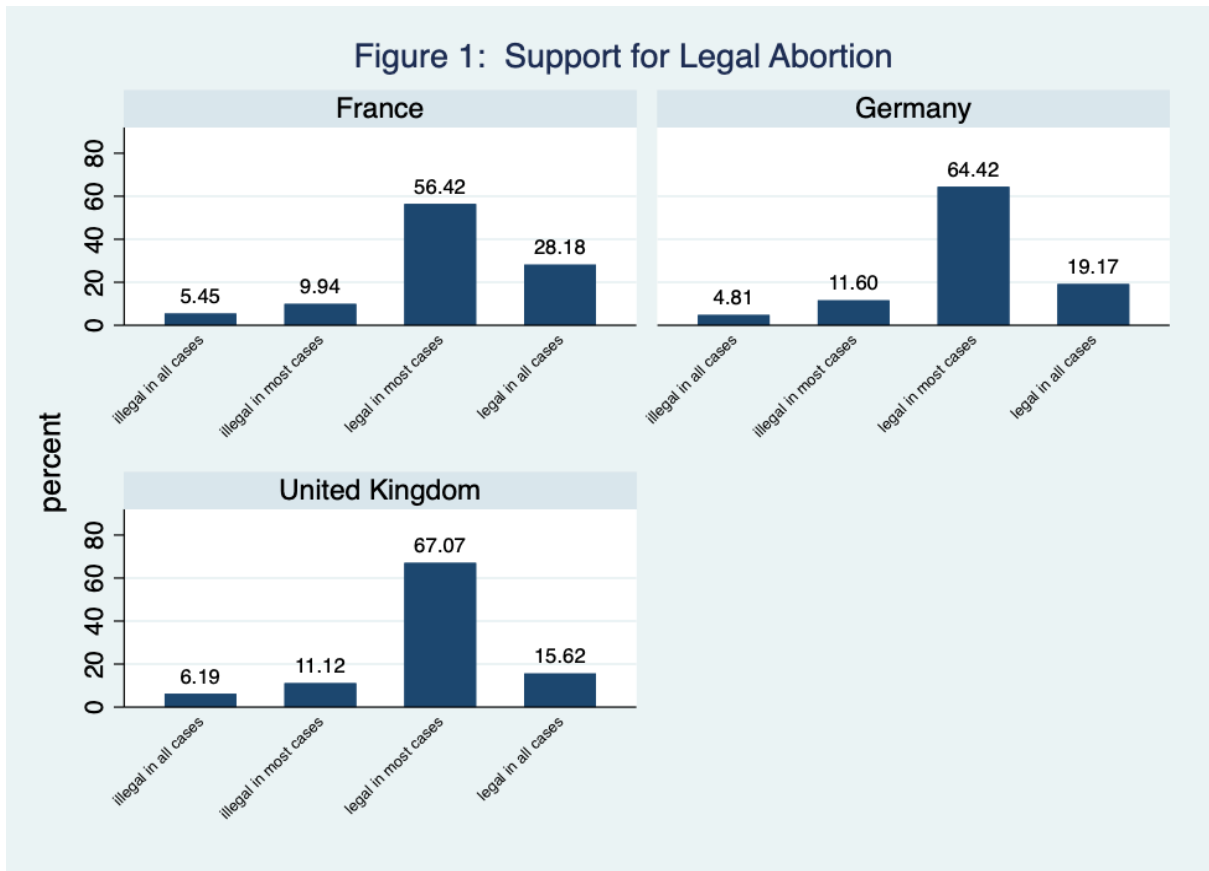
agreement was reached. This agreement states that according to German law, paragraph 218, abortion is illegal. However, neither the doctor nor the patient is allowed to be prosecuted as long as specific requirements are met (Kamenitsa, 2002: 111). These requirements include: the abortion must be procured within three months of implantation, the woman must complete required counseling, receive certification of that counseling, and then wait for 3-days (Kommers 1994). Abortion was and continues to be a more contentious issue in Germany. As recently as 2019, debates occurred regarding the fining of a German doctor for providing information about abortion services on her website (Schulteis, 2019). Perhaps this contentiousness is due to the allowance of religion, particularly Christianity, to exist in the public sphere in Germany, evidenced by the CDU actively resisting a change to the existing abortion laws which would allow for the doctor to be fined. The CDU remains opposed to “encouraging” women from terminating their pregnancies and are unequivocally religious in their parties’ beliefs (Schulteis, 2019).

In both England and Wales, abortion law was decided in 1967 and has remained consistent since then. Named the “Abortion Act of 1967,” instead of repealing previous prohibitions on abortion from the late 1800s, the act sought to carve out an exception for women. The Act states that “abortion will be legal in cases where two “registered medical practitioners agree in good faith that an abortion should be provided” and the abortion must take place within 23 weeks and 6 days of pregnancy (Lee, Sheldon and Macvarish 2018 and the BBC 2019). It is important to note that this is the law of the land for England, Scotland and Wales. In Northern Ireland, other requirements must be met based on their landmark judgement of abortion in 2019 (Amnesty International 2019). When researching abortion legalization in England, little mention

is made of the Anglican Church or the role of religious groups in general. Following the Act of 1967, abortion was not widely debated in England or Wales.

Before analyzing the attitudinal data, Figure 1 shows the raw data concerning attitudes toward abortion in these three countries.<sup>1</sup> While there is some variation between how respondents in each country choose “most cases” v. “all cases,” when you combine these two options, the percentages become 85.22% in France, 83.59% in Germany, and 82.69% in the UK. As evidenced by Figure 1, attitudes toward abortion are fairly similar in these three countries, thus making them a good case for comparison to discover if the impact of attitudes toward religious separation will impact attitudes toward abortion.

<sup>1</sup> Data for all figures and subsequent data analysis comes from: “Being Christian in Western Europe” Pew Research Center, 2017



## Issue 2: Attitudes toward same-sex marriage

Same-sex marriage is another issue defined as a *morality issue* (Engeli and Varone 2011). Morality issues such as abortion and same-sex marriage are especially controversial because they deal with individuals' core value beliefs. It makes sense to investigate the legalization of same-sex marriage because it is inherently impacted by the question of separation of church and state and how much "religion" is allowed into public discourse.

While abortion was legalized in France in the 1960s, same-sex marriage, known as "mariage des personnes de même sexe" in French, was legalized much later in May of 2013 (Moliner 2015). The issue of same-sex marriage occurred later partially because of a unique system that existed in France prior, the system of PACS- *pacte civile de solidarité*- which was

legalized in 1999 (Moliner 2005). PACS was created as an alternative to marriage for some couples, but also as a substitute for marriage for same-sex couples that could not yet legally marry in France. Being “PACSeD” is similar to entering into a civil union. Individuals are given most of the tax benefits as married couples, including: filing joint tax returns, exempting spouses from inheritance taxes, permitting partners to share insurance policies, easy access to residency permits for foreigners and their French partners, and makes partners’ responsible for each other’s debts. PACS also require only paperwork and a hearing before a judicial official and are much easier to end than a marriage (Sayare and de la Baume, 2010). While an alternative to marriage, many homosexual couples continued to want equal treatment under the law. Thus, in 2013, same-sex marriage was legalized.

It is important to note that in France a marriage must be performed under “government-sanctioned circumstances” to be considered legal. If a couple were to be married in the Catholic Church but not also have a government-sanctioned ceremony, the marriage is void in the eyes of the French legal system (Reetz 2014). Because marriage is considered both a political and religious agreement in France, legalization of same-sex marriage was, and is, contentiously debated.

In fact, *mariage pour tous* (“marriage for all”) was the name of the social movement used to push the legalization of same-sex marriage, a strong, conservative counter-movement coined *manif pour tous*, or “protest for all” also existed. (Reetz 2014). Despite the evident strength of the *manif pour tous* protests by conservative Catholics, the “signs, slogans, and paraphernalia ” used did not “enter onto religious ground” (Reetz 2014). Because of the prevalence of laïcité and emphasis on secularism in France, the debate against same-sex marriage instead focused on protecting pre-existing gender stereotypes and family institutions in France (Moliner 2015).

Dissidents knew that secularism was inherent to French society, so their campaign could not be about protecting Catholic marriage beliefs but had to be about protecting French society from a kind of liberal erosion. Because of the debate and controversy that same-sex marriage has had in France, it is an interesting issue to measure the impact of *laïcité* and see if attitudes toward secularization are more prominent in France, despite the presence of a strong, conservative backlash to same-sex marriage which was seen as incongruent with traditional French society.

Due to the traumas of the Third Reich and WWII, marriage in Germany was deemed necessary to protect German families. In the Basic Law of 1949, Article 6 provides a legal framework stating “Marriage and family shall enjoy the special protection of the state” (Sanders 2012). Marriage is also considered primarily a legal institution, and religious ceremonies, like in France, hold no legal effect. (Sanders 2012).

While cohabitation is popular across all of Europe, including France and Germany, the German legal system does not deem any rights to cohabitating couples if they do not undergo a civil ceremony. Since 2002 after a decision by the FCC in Germany, however, civil partnerships were deemed legal which gave same-sex couples the opportunity to legalize their relationship with a civil ceremony (Sanders 2012). There have been many legal cases dealing with the legal framework for marriage versus a civil partnership. The most recent case, which debated survivors’ pensions for partners, ended in the conclusion by the FCC that civil partnerships and marriage were “separate but equal” (Grunberger 2010).

Legalizing same-sex marriage beyond civil partnerships in Germany instigated major debate. The Christian Democratic Party (CDU) with Angela Merkel at the helm of government continually refused to legalize same-sex marriage or allow votes in Parliament concerning the matter (BBC 2017). Surprising many in 2017, Merkel decided to allow the vote to take place in



Parliament due to a “decision of conscience” (BBC 2017). While it was difficult to find specific information concerning the public debate of same-sex marriage in Germany, which was legalized in 2017, it is clear that like in France, there were active religious opponents. Because Germany allows for religious institutions to exist in the public sphere, and the CDU is a major power player within German politics, it makes sense that full legalization occurred later in Germany than in France. Germany’s unique interpretation of religious freedom allows religious institutions to play a more public role, so it is important to investigate if belief of religious separation has the same impact on attitudes in Germany toward same-sex marriage that I expect it to have in France.

Much like in France, in 2005 in the UK couples were granted “civil partnerships,” which offered them officially recognized unions with full legal rights (Kettell 2013). However, the legalization of same-sex marriage produced great debates across England, Scotland and Wales. The majority of this opposition came from various religious groups in the UK, with Quakers and Unitarians alone stating their support (Kettell 2013). Regardless of the debate that ensued, same-sex marriage was legalized for Wales and England in 2013, excluding Scotland and Northern Ireland.<sup>2</sup>

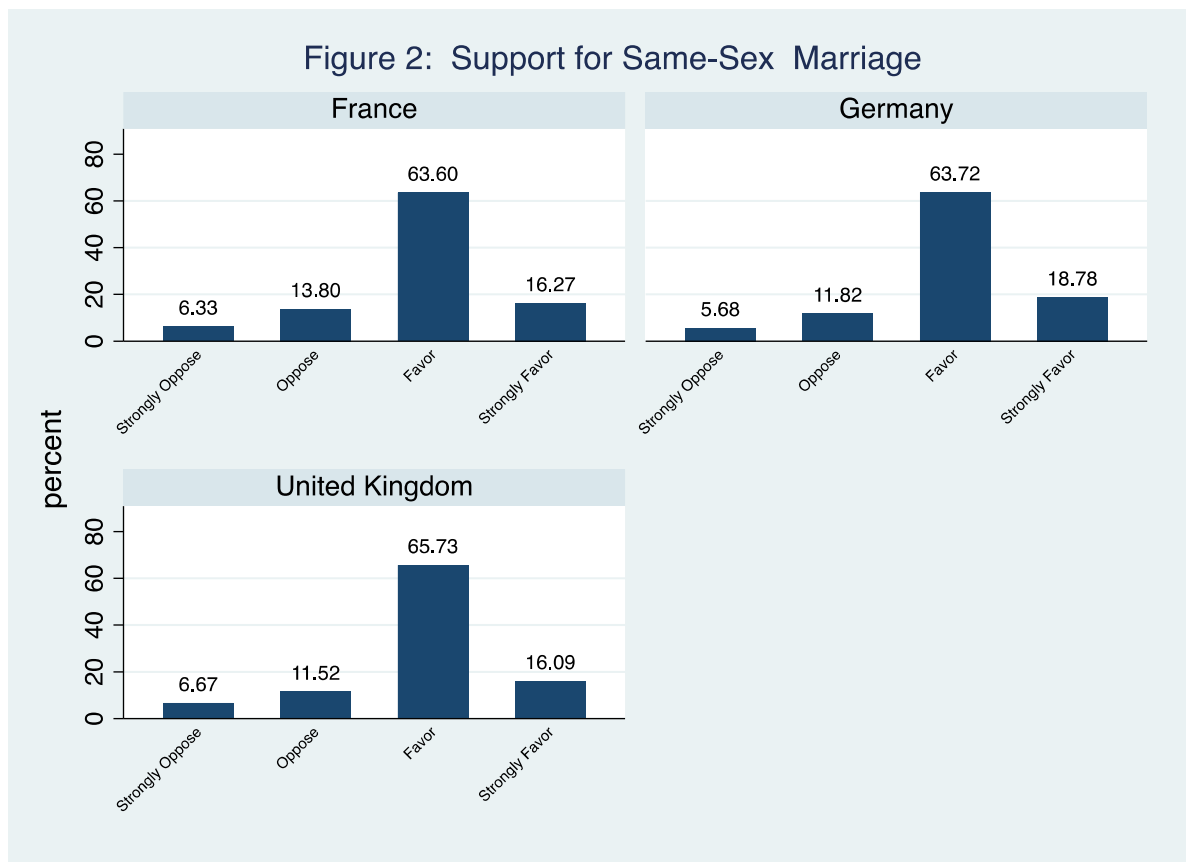
Similar to France, although the main opposition stemmed from religious institutions, specific religious reasons for opposition were mostly absent or downplayed in public presentations. Instead, the debate used secular core ideas. The first being an emphasis on the traditional and historical sources of authority for marriage, emphasizing marriage as explicitly heterosexual and for the purposes of procreation and societal stability. It was argued that changing the “definition of marriage is beyond the purview of the state” (Kettell 2013). A

<sup>2</sup> Northern Ireland and Scotland did legalize same-sex marriage later, in 2014 (Kettell 2013).

secondary, and maybe more important issue also arose during the same-sex marriage debate. This issue focused on the discrimination of religious groups and individuals that felt legalizing same-sex marriage would cause discrimination for religious people that continued to believe in exclusively heterosexual institutions, thereby posing a threat to religious freedom (Kettell 2013).

This secondary issue in the debate of same-sex marriage is particularly intriguing to my research because it implies that legalizing same-sex marriage (as argued in the UK), would somehow be a threat to religious freedom for the religious, rather than a matter of equality for the non-religious. But again, we see that religious institutions, and explicit religious doctrine was mostly kept out of the debate of same-sex marriage, highlighting the idea at the core of my research- that secularism is inherent and evident throughout France, Germany, and the UK.

In Figure 2, we can see the statistics comparing attitudes toward same-sex marriage across the three countries. Again, the percentage of respondents that “favor” same-sex marriage are similar across the board: 63.6% in France, 63.72% in Germany, and 65.73% in the UK. The percentage of respondents that “strongly oppose” the issue are also similar, between 5-6% for each of the three countries.



**Issue 3: Attitudes toward importance of Christianity as part of national identity**

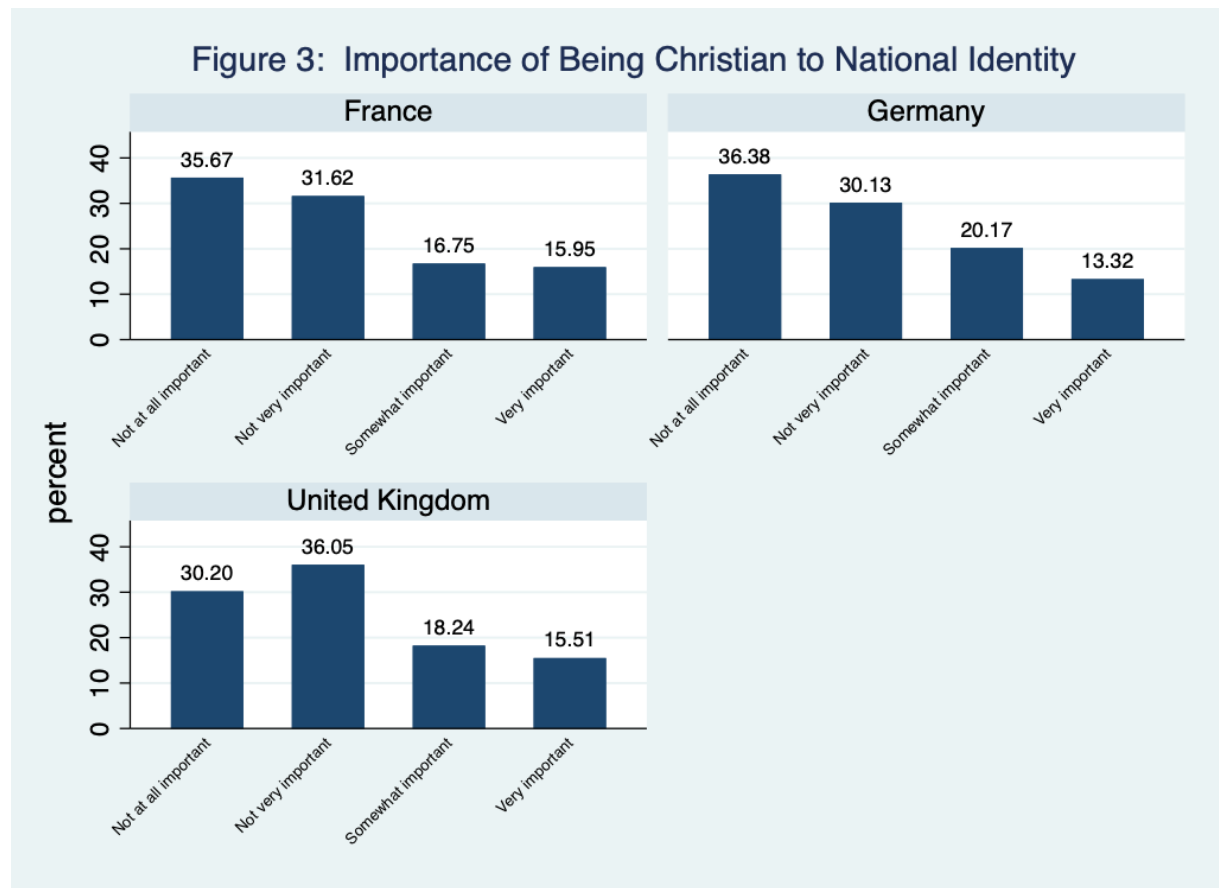
While *laïcité* in France is understood as a strict separation between church and state, some scholars argue that *laïcité* has been interpreted to allow for *some* state intervention into religious matters (Hunter-Henin 2012). This justification is supported by the Debre Law of 1959 which allows the state to provide financial assistance to private, religious schools (primarily Catholic) in France as long as they have “entered into a contract with the State.” Although, governmental monetary support for private institutions is a far cry from religious intervention in government matters. Tension between secular, Republican France and its Catholic roots does exist, however, and my goal is to investigate if the impact of *laïcité* impacts the importance of Christianity to French national identity.

Religion's role in the public sphere in Germany is distinct and different than in France. In Germany, religion is a major part of the public discourse. The CDU, an important governing party of Germany, is outspoken of its "Christian-ness." The CDU's own conceptualization of "Leitkultur," or German culture, is inherently tied to Christian and Jewish traditions (Korteweg and Yurdakul, 2014: 148). The SPD, an oppositionist party in Germany has attacked the CDU's message, calling it exclusionary and an attempt to create a "we" versus "others" mentality in Germany, meaning Christian Germans versus non-Christian Germans (Korteweg and Yurdakul, 2014: 148). It is this question of what it means to be German, and whether German is multicultural or only Judeo-Christian-cultural that Germany continues to struggle with. If Germany does not have as clear a defining identity like the French Republic, then do religious and historic ties of Judeo-Christian beliefs impact Germany and the understanding of German national identity differently than in France?

It is more difficult to interpret national identity when speaking entirely about the British Isles, although the data used is primarily respondents from England and Wales (and the Northern Ireland respondents are not statistically significant). Scholars note that English citizens have a hard time distinguishing themselves from the citizens of the British Isles, thus combining Scotland, Wales and Northern Ireland into the "English identity" (Kuman *The Making of English National Identity*, 2003). As Kuman notes, England has been the largest and most powerful state of the British Isles, and continues to be the most populous. England makes up more than four-fifths of what is considered the "United Kingdom" (Kuman, 2003). Technically, within the United Kingdom, the Church of England and the Church of Scotland remain established, but the Church of Ireland and the Church of Wales have been disestablished. The continued establishment of the churches means that there is an official recognition and approval of the two

churches (Fischer and Wallace, 2006). While historically in England this meant that the Monarch and the Church of England were unified, today the contemporary church is not considered unified with the nation. Furthermore, though the discrimination of Roman Catholics or other religious groups in England no longer exists, there is still a sense of religion as a positive that should be supported by the government. While the government is required “publicly to acknowledge the existence and value of religion, it does not require the state to impose religious belief, or any particular religious belief, on its citizens” (Fischer and Wallace, 2006). Because of the continued establishment of the Church in the British Isles, I am interested to see if Christianity is more or less impactful in Britain compared to France as the French have taken a drastically different, separatist approach.

Figure 3 shows the attitudes toward the importance of being Christian to national identity. While there is some variation between the three countries on the “not at all important” and “not very important” responses, when combining these two answer choices we see that 67.29% in France, 66.51% in Germany, and 66.35% in the UK have weakened attitudes toward the importance of being Christian to their nationality. Again, the attitudes toward this idea are extremely similar, so it is an interesting comparison to then examine the impact of attitudes toward religious separation on these fairly similar attitudes.



**Issue 4: Attitudes toward Islam’s compatibility with national identity**

The issue of Islamic integration into European culture, particularly the debate concerning headscarves in public spaces, has proved to be contentious across Western Europe. Many argue that Islam is in fact incompatible with European institutions because social identities in Europe remain “anchored” to Christianity, therefore European culture does not make room for Islam or Muslim citizens (Statham 2015).

In France, the Muslim headscarf debate ignited after 1989 when three young girls, attending a public school in a Parisian suburb, were told they could not attend school with the headscarf (Korteweg and Yurdakul, 2014: 23). While various challenges to the school’s decision

took place, by 2004 the French Parliament officially voted to ban wearing the headscarf in schools (Korteweg and Yurdakul, 2014: 24). After more public debate beginning in 2009 which centered on which other places to ban the headscarf, in 2011 a law came into full effect which banned “all facial coverings” (to ensure no international human rights violations) in public. The French retained that the wearing of headscarves was political symbolism, not religious (Korteweg and Yurdakul, 2014: 42). Because of the prevailing ideology of *laïcité* in France which requires a strict separation between church and state, there has been significant hesitation in France to “displays of religiosity in public environments” (Statham, 2015). The French understand the headscarf, and Islam itself, to be a “threat to the principles of republicanism, *laïcité*, and gender equality, key concepts in the French national narrative (Korteweg and Yurdakul, 2014:17). Because of the perception that Islam is inherently political, it will be interesting to see if the emphasis on French national identity being secular will impact the level of French citizens’ openness to Muslim compatibility.

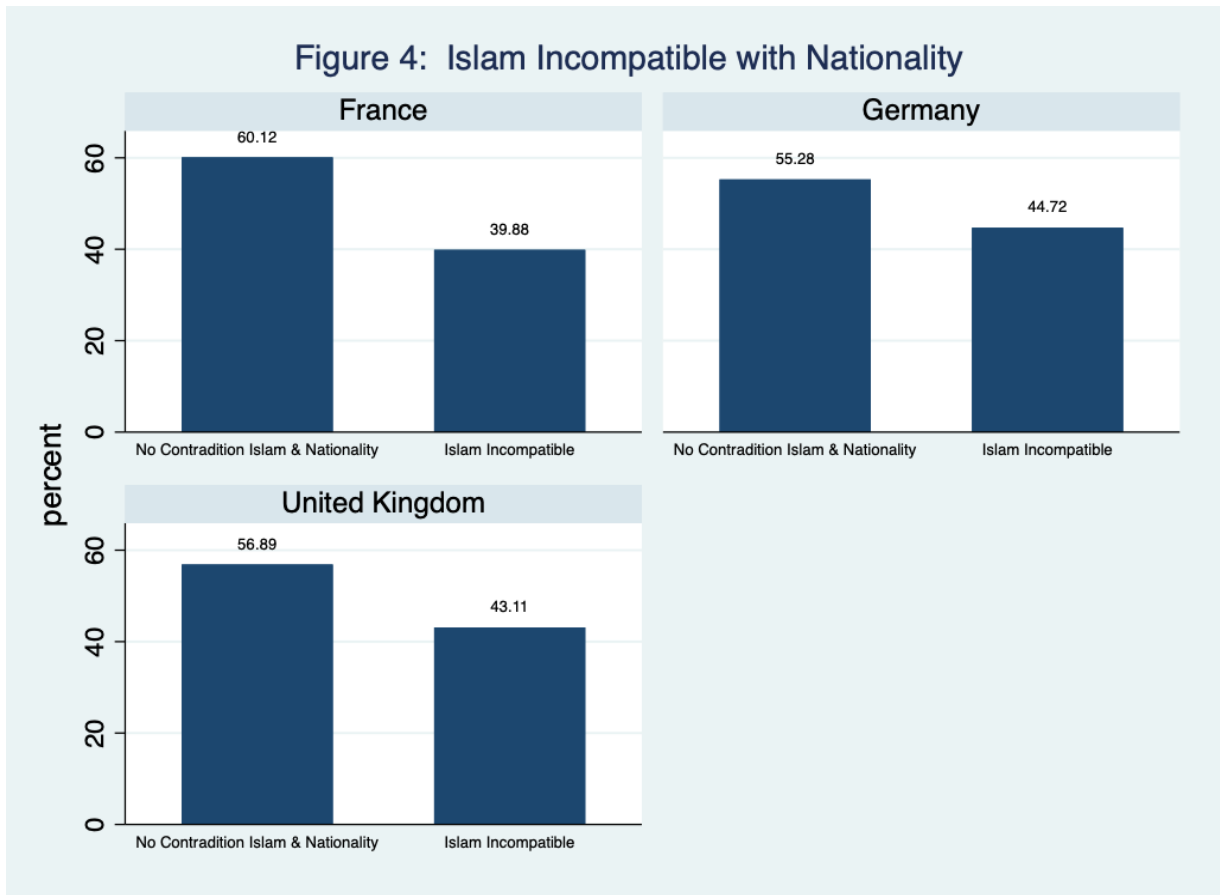
Germany has maintained a place of privilege for some religious institutions, but has struggled to incorporate Islam and Muslim citizens into the public domain. In 2003, a German schoolteacher was denied a teaching position which she argued was due to her wearing a headscarf. The FCC ruled that she could not be denied a position simply for wearing the headscarf. Following this ruling, the FCC encouraged each German state to decide whether or not wearing headscarves in schools or public spaces was acceptable. Since then, each German state has developed its own particular policy concerning the headscarf, basing their decisions on the state’s “ethno-religious composition and current ruling political powers” (Korteweg and Yurdakul, 2014:137). The headscarf in Germany has caused political debate in a way Christian symbols have not because of its interpretation, much like in France, as a political symbol rather

than religious symbol. While Germany emphasizes religion's allowance in the public sphere, this has not been conceptualized for religions outside of Christianity. Because of this unique approach to Muslim symbols, I am interested to see if the impact of religious freedom reveals itself in Germany, a country that has not made much space for Muslim integration in its public sphere while maintaining Christian institutions in prominent positions.

In England, it is especially interesting to note that there is not currently a ban on the headscarf in public spaces. While debate has occurred regarding the banning of headscarves in schools, England's commitment to not banning the headscarf stands out as it seems to provide evidence for the idea that the English interpretation of religious freedom is based on a multicultural secular identity. It will be interesting to see if there is a major difference between the impact of religious freedom concerning attitudes in the UK vis a vis France and Germany, two countries that have much more explicitly made Muslim integration more difficult.

Finally, in Figure 4 we see attitudes toward Islam's compatibility with nationality. While the French percentage is a bit higher at 60.12% of respondents who think there is no contradiction between Islam and nationality, Germany and the UK have percentages at 55.29% and 56.89% respectively, still fairly similar percentages for comparison.





## Research Design

Based on the literature and specific issues cited above, it appears that although most Western European countries have religious freedom as a tenet of their institutional protections and have emphasized secularism within government to express this religious freedom for citizens, each country has chosen its own path for interpretation of religious freedom. I expect that religious freedom will impact all Western European countries on every issue, but the impact in France will be stronger due to France’s commitment to *laïcité*, resulting in the conclusion that religious freedom has a greater impact on how citizens in France evaluate abortion, same-sex marriage, and the importance of Christianity and Muslim integration to nationality than it does in other Western European countries. I hypothesize that this difference in the application of

religious freedom and secularization has an important contextual effect that impacts citizen responses to the socio-political issues I am examining. In France, because of this contextual effect, I expect the impact of attitudes toward religious freedom will be more pronounced than in either Germany or the UK.

My research approach is to examine attitudes toward religious freedom and the impact these attitudes have on several different socio-political issues. My goal is to examine the link between the importance of religious freedom and attitudes toward abortion, attitudes toward same-sex marriage, attitudes toward the importance of Christianity as a part of national identity, and attitudes toward the incompatibility of Islam to national identity. First, I begin with my hypotheses regarding the general impact of religious separation on the attitudes discussed above, as well as the hypothesized differential impact in France, relative to Germany the UK, created by the hypothesized contextual environment of *laïcité*.

### *Hypotheses*

#### *Abortion*

- a. Attitudes reflecting religious separation are positively associated with attitudes toward reproductive rights
- b. The impact of attitudes toward religious separation on attitudes toward abortion is stronger in France than other countries

#### *Same-sex marriage*

- a. Attitudes reflecting religious separation are positively associated with attitudes toward reproductive rights

- b. The impact of attitudes toward religious separation on attitudes toward same-sex marriage will actually not be stronger in France, due to the framing of the argument in France which emphasized same-sex marriage as incompatible with French tradition, not as incompatible with a secular state.

#### *Importance of being Christian to nationality*

- a. Attitudes reflecting religious separation and attitudes toward religion as a part of a country's national identity will be negatively associated
- b. The impact of attitudes toward religious separation on attitudes toward Christianity importance as a part of a country's national identity will be stronger in France, creating an increased negative effect

#### *Islam's Compatibility with National Identity*

- a. Attitudes reflecting religious separation are positively associated with attitudes toward believing that Islam is incompatible with national identity
- b. The impact of attitudes toward religious separation on attitudes toward Islam will be significantly stronger in France

#### *Data and Measurements*

The data I use is from the 2017 Pew Research Dataset called "Being Christian in Western Europe." This data measures attitudes in Europe on various issues, relying on survey responses from many countries. I am examining France, Germany and the UK within this data. While I originally intended to use more countries, my theoretical framework lends itself to the examination of France, Germany, and the United Kingdom. In addition, data limitations in the Pew dataset make it difficult to move beyond these countries. Specifically, the ideology variable,

used in my analyses as a control, is set up differently in the data for the other countries, and thus is not comparable. The Pew study splits the ideology variable for France, Germany, and the UK into two separate variables, which reduces the number of respondents to: 842 for France, 1082 for Germany, and 889 for UK. These subsamples remain representative and are large enough to make reasonable inferences from the data. This survey data from Pew provides the foundation for my examination of attitudes and will allow me to perform quantitative analysis on data from these three countries, examining the raw attitudes while also examining the differential impact of attitudes in France relative to Germany and the UK.<sup>3</sup>

My analytical approach will be to use ordinary least squares regression (OLS) to examine the impact of attitudes toward government separation from religion on attitudes toward abortion, same-sex marriage, and the importance of Christianity and Islam toward feelings of country nationality. OLS allows me to determine the impact of my primary explanatory variable (attitudes toward religious separation) while controlling for the potential impacts of other variables (e.g.: religiosity, ideology, education, etc.).<sup>4</sup>

In order to isolate the hypothesized contextual effect of *laïcité* in France, I will be using an interaction term created by multiplying a dummy variable for France (France = 1, Germany and UK = 0) by the religious separation variable. This allows me to measure the impact of attitudes toward religious separation on the various dependent variables while also isolating the

<sup>3</sup> While the quantitative research I will present uses the United Kingdom in its survey, for the purposes of understanding the approach the whole of the UK has taken, I am going to evaluate and conceptualize religious freedom in England, understanding that certain concepts may be different in Scotland or other areas of which the UK comprises. Also, I reached out to the Pew Research Center and the majority of respondents in this survey were from England, in fact the number of respondents was no longer statistically significant if English respondents were removed from the data, as they comprise 91.5% of respondents.

<sup>4</sup> Technically speaking, the categorical nature of the dependent variable would call for an ordered probit, but for ease of interpretation, I am using OLS. All analyses have been done using ordered probit and results are consistent with those reported here.

hypothesized differential impact of laïcité by directly comparing the effect of these attitudes in France versus the other two countries. I will expand on this strategy below. My expectation is to not only find a statistically significant impact of religious separation, but a statistically significant differential impact in France.

## **Issue 1: Attitudes toward abortion**

### *Operationalization of Variables*

*Primary independent variable: Attitudes toward religious freedom*

The goal of my research is to measure the impact of attitudes toward religious freedom on various socio-political issues. I am defining religious freedom as a belief in a separation of church and state, keeping religion from interfering in the public sphere and government policies. To measure peoples' attitudes toward religious freedom, they were asked the following question: "Please tell me whether the FIRST statement or the SECOND statement comes closer to your own views (even if it does not precisely match your opinion):

0 = Government policies should support religious values and beliefs

1 = Religion should be kept separate from government policies

*Dependent variable: Attitudes toward abortion*

As discussed previously, attitudes toward abortion reveal a morality issue that allows for an interesting relationship to be seen between attitudes toward abortion and how those opinions are impacted by attitudes toward religious freedom. In order to effectively analyze attitudes toward abortion, respondents answered the following question and were coded from 1-4 based on their response below: "Do you think having an abortion should be":

1 = illegal in all cases

2 = illegal in most cases

3 = legal in most cases

4 = legal in all cases

### *Control Variables*

I chose to control for: religiosity, ideology, and education levels. While I was investigating Christian-majority countries, I did want to ensure that the religiosity of respondents was accounted for on the abortion and same-sex marriage issue, as these issues are considered morality issues and therefore impacted by a respondent's individual religious beliefs. The expectation is that the more religious respondents are, the more likely they are to have negative attitudes toward abortion. For the purposes of my analysis, I wanted the focus to be on the impact of religious separation, therefore controlling for religiosity allows me to be able to see this impact separate from respondent's individual religious beliefs. To account for religiosity, I created an additive index, coded from less religious to more religious, based on responses to three questions. The questions asked were:

Church attendance: "Aside from weddings and funerals, how often do you attend religious services...."

1 = never

2 = seldom

3 = a few times a year

4 = once or twice a month

5 = once a week

6 = more than once a week

Importance of religion: "How important is religion in your life?"

1 = not important at all

2 = not too important

3 = somewhat important

4 = very important

Frequency of prayer: “Aside from religious services, do you pray:?”

1 = seldom

2 = a few times a month

3 = once a week

4 = a few times a week

5 = once a day

6 = several times a day

I also controlled for ideology, as the literature shows that there is a link between public policy attitudes and ideological predispositions (Medoff 2002). As abortion is not only a moral issue, but also considered to be a social issue, I found it important to ensure that ideology was accounted for. In general, the more liberal one is, the more likely they are to support the right to choose and the more conservative one is, the less likely they are to support the right to choose (Medoff 2002). To account for ideology, respondents were asked the following question:

“Some people talk about politics in terms of left, center, and right. On a left-right scale from 0 – 6, with 0 indicating extreme left and 6 indicating extreme right, where would you place yourself?”

In order to control for education, Pew created its own education variable that allows for comparison across the different educational systems in each country. Pew notes that these four categories of educational attainment are based on UNESCO’s International Standard

Classification of Education from the 1997 revision. This adjusts for differences in national educational systems around the world and takes into account additional criteria like starting age of education, duration of schooling, and entrance exams. (Pew Appendix, 2017). I expect that the more highly educated one is, the more likely they are to support a woman's right to choose.

Four levels of educational attainment were used:

1. No formal schooling
2. Primary education
3. Some secondary education
4. Post-secondary education, also referred to as "higher education"

## **Analysis**

As noted above, I performed OLS regression analysis to examine the impact of attitudes toward religious separation on attitudes toward abortion, while controlling for other potential explanations. In order to isolate the hypothesized contextual effect of laïcité in France, I used an interaction term created by multiplying a dummy variable for France (France = 1, Germany and UK = 0) by the religious separation variable.

In addition, to account for the possibility that the impact of religiosity on abortion attitudes may also be stronger for the almost uniformly Catholic population in France, I include an interaction term for France\*religiosity. Table 1 below contains the results I found.



Table 1: Religious Separation and Attitudes Toward Abortion	
Variable	Coefficient
France	-.3442 (.111)*
Religiosity (Germany and UK)	-.031 (.005)*
Religious Separation (Germany and UK)	.1582 (.0337)*
France*Religiosity	-.0297 (.0086)*
<b>France*Religious Separation</b>	<b>.1333 (.068)*</b>
Education	.0027 (.002)
Ideology	-.0027 (.012)*
Constant	2.51 (.071)*
R <sup>2</sup>	.09
N	2647
*Significant at $p < .05$ or better, one tailed. Standard errors in parentheses	

Beginning with the control variables, as expected, the analysis indicates that ideology is strongly associated with attitudes toward abortion. The more conservative the individual, the less likely they are to support legalized abortion. Education did not exert a significant impact.

The dummy variable for France is significant and negative, indicating that when controlling for these other factors, abortion attitudes in France tend to be somewhat more negatively associated toward abortion relative to Germany and United Kingdom.

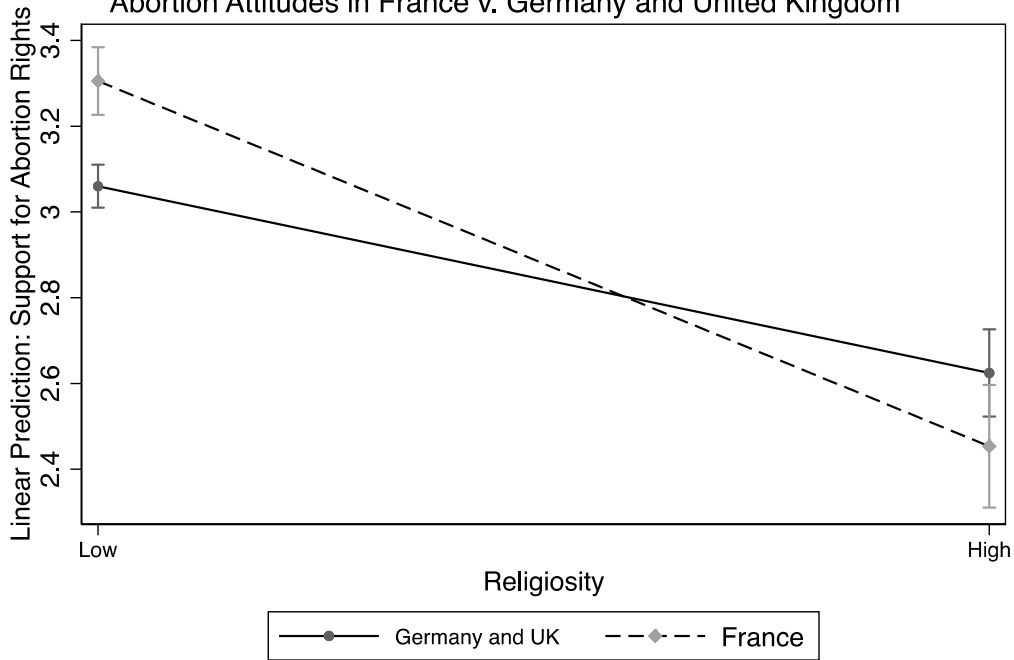
The coefficient for religiosity represents the impact of religiosity on abortion attitudes in Germany and the UK – because of the interaction term isolating France. The significant negative coefficient indicates that, as expected, greater religiosity is associated with more conservative abortion attitudes in these two countries.

With regard to the hypothesized differential impact of religiosity in France, the results are in keeping with expectations. The interaction term (France\*religiosity) is significant and negative, indicating that the impact of religiosity on abortion attitudes is stronger in France, increasing the negative effect. We see this clearly when examining marginal effects. As Table 2 indicates, the baseline effect (Germany and the UK), for religiosity on abortion attitudes is -.0311. For France, this negative coefficient increases to -.0608 as shown below, which is consistent with the large Catholic presence in France.

Country	Marginal Coefficient
Germany and UK	-.0311* (.005)
France	-.0608* (.007)

Figure 5 illustrates the impact of these differences in terms of predictive marginal values. Here we see quite clearly the increased magnitude of the effect in France, as we move from low to high levels of religiosity.

Figure 5: Predictive Marginal Effects of Religiosity - Abortion Attitudes in France v. Germany and United Kingdom



My primary interest, however, is with the impact of attitudes toward government and religious separation on favorability toward abortion rights, and whether these attitudes exert a stronger effect in France. The variable examining attitudes toward religious separation from government policies is significant and positive, as expected. Because of the interaction term isolating France, this coefficient describes the relationship between attitudes toward religious separation and abortion attitudes in Germany and the UK. Those who indicate religion should be kept private from government are more likely to have more liberal attitudes on abortion access.

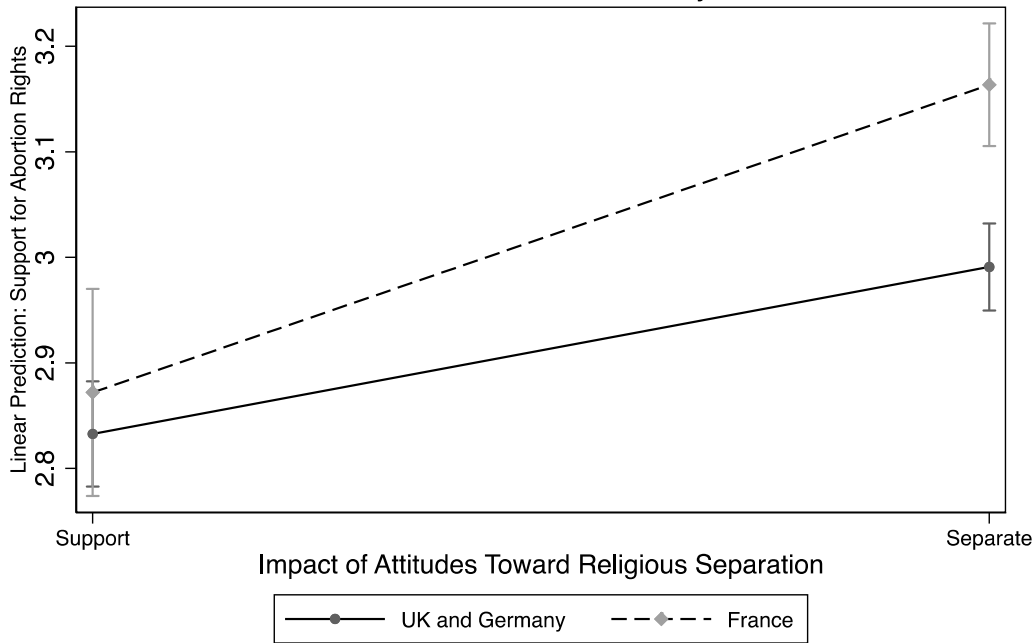
The interaction term (France\*Religious Separation) is significant and positive, indicating that the impact of laïcité on abortion attitudes is stronger in France. An examination of marginal effects (Table 2 and Figure 5) reveals that the baseline effect (Germany and the UK) for religious separation on abortion attitudes is .1582. For France, this almost doubles to .2915, corresponding to my hypothesis about the contextual effect of laïcité. This statistically

significant effect shows that when religiosity, ideology, and education are controlled for, French respondents are more likely to have their attitudes toward abortion impacted by their attitudes toward religious separation. That is to say, in France, the unique cultural implication of laïcité has impacted attitudes toward abortion because in France, respondents are more likely to believe in a stricter interpretation of separation of church and state, making abortion an issue that is considered separate from religion.

Table 3: Average Marginal Effects – Religious Separation on Abortion Attitudes in France, Germany, and the United Kingdom	
Country	Marginal Coefficient
Germany and UK	.1582* (.034)
France	.2915* (.059)

Figure 6 illustrates these differential effects. While the impact of attitudes toward religious separation on abortion rights attitudes is significant for both sets of countries, the effect is much stronger in France, as illustrated by the steeper predictive marginal effect. Therefore, attitudes toward religious separation have a bigger impact with regards to abortion in France, relative to Germany and the UK.

Figure 6: Predictive Marginal Effects of Religious Separation - Abortion Attitudes in France v. Germany and UK



## Issue 2: Attitudes toward same-sex marriage

### *Operationalization of Variables*

*Primary independent variable: Attitudes toward religious separation*

The primary independent variable remains attitudes toward religious separation, measured using the same question as above.

*Dependent variable: Attitudes toward same-sex marriage*

For Issue 2, I am estimating the impact of religious separation on attitudes toward same-sex marriage. In order to gauge attitudes on same-sex marriage, respondents were asked the following question: “Do you strongly favor, favor, oppose, or strongly oppose allowing gays and lesbians to marry legally?” Respondents then answered on a scale of 1-4, from strongly oppose to strongly favor.

1. strongly oppose

2. oppose
3. favor
4. strongly favor

### *Control Variables*

I again controlled for religiosity, ideology, and education in the same manner as Issue 1. Because abortion and same-sex marriage are both classified as morality issues, the justifications for these control variables remains the same.

### **Analysis**

As with the previous analyses, I performed OLS regression analysis to examine the impact of attitudes toward religious separation on attitudes toward same-sex marriage. In order to isolate the hypothesized contextual effect of laïcité in France, I used an interaction term created by multiplying a dummy variable for France (France = 1, Germany and UK = 0) by the religious separation variable.

To account for the possibility that the impact of religiosity on abortion attitudes may also be stronger for the almost uniformly Catholic population in France, I again include an interaction term for France\*religiosity. Table 4 below contains the results I found.

Regarding the control variables, as in the previous analysis, ideology is in the negative direction and significant. As expected, the more conservative one is, the less liberal attitudes they tend to have toward same-sex marriage. Concerning education, education is in the positive direction but is not significant.

The dummy variable for France is negative and not significant, indicating there is no significant difference regarding attitudes toward same-sex marriage in France relative to Germany and the UK when controlling for these other factors.

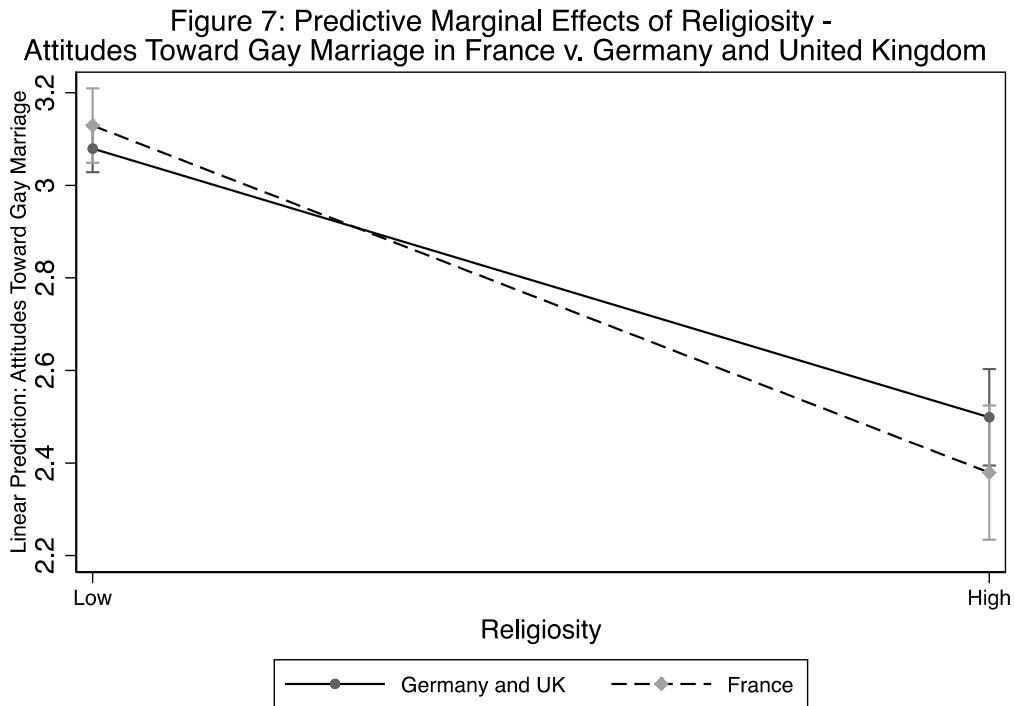
Table 4: Religious Separation and Attitudes Toward Same-Sex Marriage	
Variable	Coefficient
France	-.1398 (.113)
Religiosity (Germany and UK)	-.0415* (.005)
Religious Separation (Ger and UK)	.1534* (.034)
France*Religiosity	-.0121 (.009)
<b>France*Religious Separation</b>	-.0257 (.069)
Education	.0013 (.002)
Ideology	-.104* (.011)
Constant	2.56* (.075)
R <sup>2</sup>	.102
N	2628
*Significant at $p < .05$ or better, one-tailed. Standard errors in parentheses	

The coefficient for religiosity represents the impact of religiosity on same-sex marriage attitudes in Germany and the UK. Because same-sex marriage is also considered a morality issue, it is important to account for strength of religious belief in all three countries. This

coefficient is significant and negative, revealing the same pattern as seen in France: the greater the religiosity, the less liberal attitudes are shown to be toward same-sex marriage.

In terms of the interaction term (France\*Religiosity), this variable is negative but not significant. This reveals that in regards to the hypothesized differential impact of religiosity in France, the results do not support this differential impact. While religiosity, as seen in Table 5 and Figure 7 below, is significant in both France and Germany and the UK, it behaves similarly in both countries, making the interaction term non-significant.

Table 5: Average Marginal Effects – Religiosity on Attitudes Toward Same-Sex Marriage in France, Germany, and the United Kingdom	
Country	Marginal Coefficient
Germany and UK	-.0415* (.005)
France	-.0536* (.07)





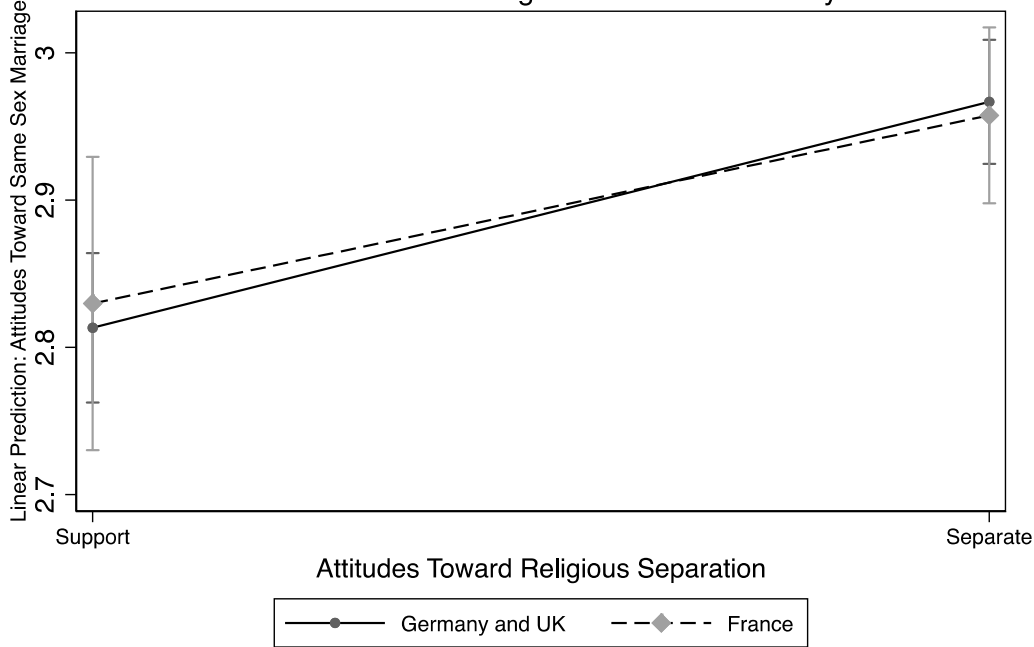
The coefficient for religious separation represents the impact of a belief that religion and government should be kept separate across Germany and the UK, because of the interaction term isolating religiosity and France. As expected, the positive coefficient indicates that the stronger attitudes toward religious separation, the more liberal attitudes are on gay marriage.

On the other hand, the France\*Religious Separation variable is not significant. Therefore my hypothesis was supported. There is no shown difference in the impact of laïcité on attitudes toward same-sex marriage in France, relative to Germany and the UK; instead, the impact of attitudes toward religious separation on attitudes toward same-sex marriage is significant across all three countries. As I noted in the background discussion of this issue, the null result in differential impact could partially be explained by the understanding of the issue of same-sex marriage. In France especially, anti-same-sex marriage advocates did not rely on religious foundations for their stance, but instead emphasized the traditional, heterogenous, French family. Therefore, French respondents may not consider same-sex marriage an issue which touches religion, but instead an issue which threatens French tradition.

Table 6 and Figure 8 show these marginal effects in Germany and the UK compared to France. As illustrated, there is no significant difference in the effect of religious separation in France relative to Germany and the UK. In other words, attitudes toward religious separation do impact attitudes toward same-sex marriage, but they do not do so differently in France.

Table 6: Average Marginal Effects – Religious Separation on Attitudes Toward Same-Sex Marriage in France, Germany, and the United Kingdom	
Country	Marginal Coefficient
Germany and UK	.1534* (.034)
France	.1277* (.06)

Figure 8: Predictive Marginal Effects of Religious Separation - Attitudes Toward Same-Sex Marriage in France v. Germany and UK



**Issue 3: Attitudes Toward Importance of Christianity for Truly Being Nationality (French, German, British)**

*Operationalization of Variables*

*Primary independent variable: Attitudes toward religious separation*

Again, the primary independent variable remains attitudes toward religious separation and is operationalized in the same manner as previously.

*Dependent variable: Attitudes toward importance of being Christian for truly being nationality (French, German, British)*

In order to understand attitudes toward Islam’s compatibility with national identity in terms of religion, I decided to also investigate the importance of Christianity to beliefs about nationality and the impact of religious separation in this context. I expected this would provide a clearer understanding of the impact of religious separation and the role it plays in the importance

of religion to national identity. This variable was measured by asking the following question: “Is Christianity important to being nationality?” Respondents answered from 1-4:

1. Not at all important
2. Not very important
3. Somewhat important
4. Very important

#### *Control Variables*

On this dependent variable, I again chose to control for religiosity, ideology and education. In addition to those variables, I believe it necessary to also add two additional controls, national pride and attitudes toward immigration. Because I am investigating an issue that discusses the importance of something to national identity, it seemed important to control for national pride. Respondents were asked the following question regarding their pride: “How proud are you to be [nationality]?” They responded on a scale of 1-4:

1. Not proud at all
2. Not very proud
3. Somewhat proud
4. Very proud

In addition, because of the high levels of Muslim immigrants in France, Germany and the UK, it was necessary to control for attitudes toward immigration. Obviously, if a respondent has exceedingly negative attitudes toward immigration, they will be much more likely to emphasize both Christianity as a national identity and negative attitudes toward Islam. To control for immigration, respondents were asked: “Do you think the number of immigrants to [country] nowadays should be increased, remain the same as it is, or be reduced?” They answered from 1-3

1. be increased
2. remain the same as it is
3. be reduced

## **Analysis**

As with the previous analysis, I use an OLS analysis and an interaction term (France\*Religious Separation) to isolate the hypothesized differential impact of laïcité in France. I dropped the religiosity interaction term because there is no theoretical reason to believe this variable will act differently on attitudes toward Christianity and nationalism in France versus the other countries.

Beginning with the control variables, we see that each generally behaves as expected. Increased conservatism is positively associated with attitudes regarding the link between nationality and being a Christian, as are attitudes toward the need to reduce immigration, and pride in nationality. The one result I did not expect was that education actually responds in the opposite way as hypothesized. The more educated one is, the more likely they are to believe that Christianity is important to national identity.

With regard to the variables of substantive interest, the France dummy indicates no significant difference between how French citizens view the importance of Christianity to nationality. Not surprisingly, religiosity has a very strong effect, with greater religious devotion being positively associated with attitudes about the importance of Christianity to French, German, and British nationality. Attitudes toward religious separation (in Germany and Britain), however, are not significant.

Table 7: Religious Separation and Attitudes Toward Importance of Christianity for Truly Being Nationality	
Variable	Coefficient
France	.1165 (.066)
Religiosity	.1321* (.005)
Religious Separation (Ger. and UK)	-.0064 (.04)
<b>France*Religious Separation</b>	<b>-.2134* (.079)</b>
Education	.0093* (.014)
Ideology	.0663* (.142)
Reduce Immigration	.1697* (.029)
Proud of Nationality	.2563* (.022)
Constant	3.73 (.106)
R <sup>2</sup>	.337
N	2545
*Significant at $p < .05$ or better, one tailed. Standard errors in parentheses	

When isolating the impact of religious separation in France, (the France\*religious separation interaction term), we do see a significant shift in this relationship. The significant negative coefficient here indicates that the impact of attitudes toward religious separation are stronger (more negative) in France, consistent with my hypothesis regarding laïcité. To the degree that people in France express attitudes indicating that religion should be kept private from

the government, they are significantly less likely than their counterparts in Germany and the UK to think that Christianity is important to their nationality. Table 8 and Figure 9 below show these results and isolate the marginal effects of attitudes toward religious separation in the three countries.

Table 8: Average Marginal Effects – Religious Separation on Attitudes Toward Christianity Being Important to National Identity in France, Germany, and the United Kingdom	
Country	Marginal Coefficient
Germany and UK	-.0064 (.045)
France	-.2197* (.07)

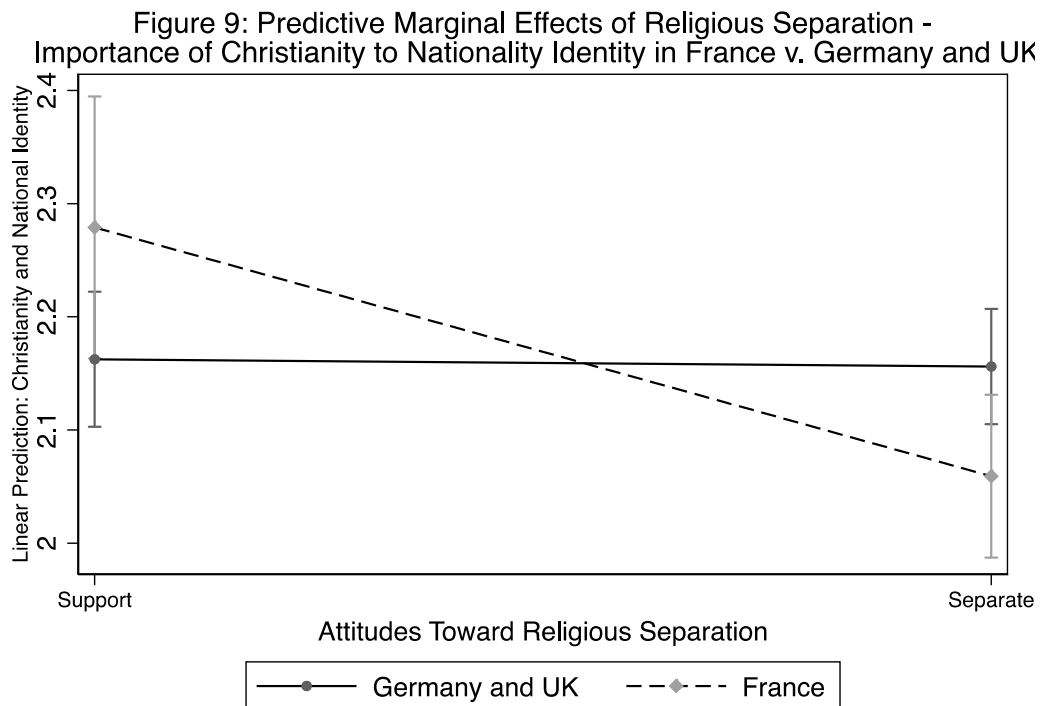


Figure 9 illustrates the negative effect that attitudes toward religious separation has in France relative to Germany and the United Kingdom. When isolating the impact in France, attitudes supporting government separation from religion have a strong negative effect on attitudes regarding whether Christianity is important to national identity. This effect is very different from what we see in Germany and the UK, and corresponds to my hypothesis about the contextual effect of laïcité. This statistically significant effect shows that when immigration and national pride are controlled for, French respondents are less likely to equate Christianity with national identity. In France, the unique cultural implication of laïcité has impacted attitudes toward Christianity because in France, respondents are more likely to believe in a stricter interpretation of separation of church and state, making Christianity less important to being truly “French.”

#### **Issue 4: Islam’s Compatibility with National Identity**

##### *Operationalization of Variables*

*Primary independent variable: Attitudes toward religious separation*

The primary independent variable again remains consistent in its operationalization, as with the previous analyses.

*Dependent variable: Attitudes toward Islam’s compatibility with national identity*

As supported by the literature, there seems to be a tension between how people view Islam and the religious freedom ideals of Western European countries. To understand this tension better, it makes sense to analyze the impact of beliefs toward religious separation with attitudes toward Islam’s compatibility with national identities. This compatibility, or incompatibility, was measured asking the following question:

Is Islam compatible with French/German/English nationality? Respondents answered either “no contradiction between Islam and nationality” and respondents were coded 0 or “Islam fundamentally incompatible” and were coded 1.

### *Control Variables*

Consistent with issue 3, I included the controls for: ideology, religiosity, education, national pride, and immigration. These controls were operationalized in the same manner as explained previously.

### **Analysis**

Table 9 shows the results of the second analysis linking attitudes toward nationality and religion, this time with a question asking whether there is a contradiction between Islam and nationality. Again, the controls behave as expected (Table 9). Conservatives, those who think immigration should be reduced, and those who express pride in their nationality are all more likely to indicate that Islam is inconsistent with their country’s nationality. The coefficient for education is negative, but does not reach the level of statistical significance. All other controls behave as expected. In particular we see that religiosity is significant and positive, indicating that the more religious one is, the more likely they are to find Islam incompatible with their nationality, which makes sense and also indicates that respondents may identify being Christian with their nationality, consistent with the results from Issue 3.



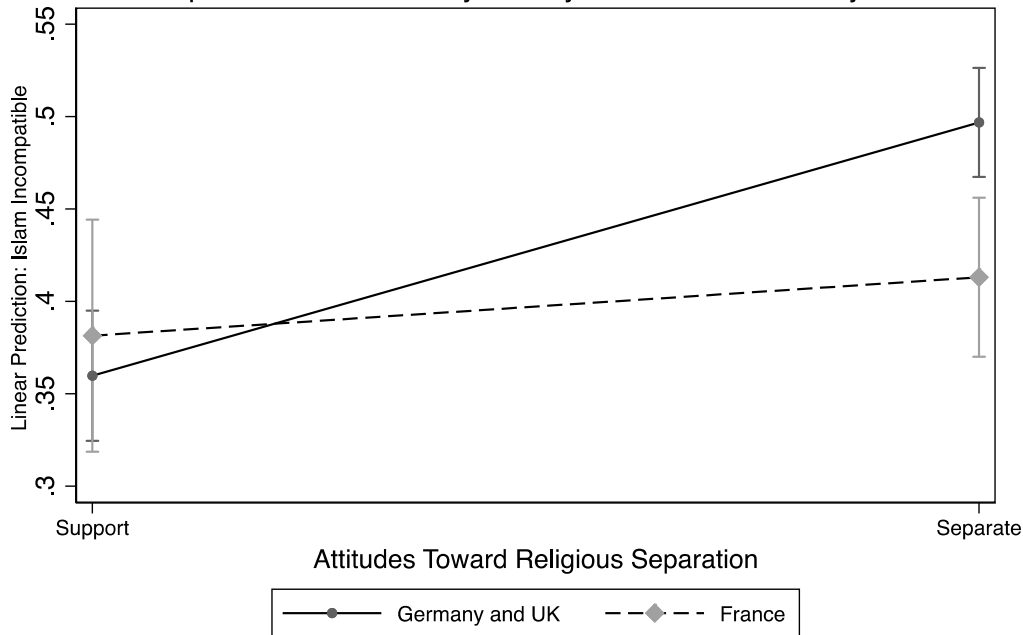
Table 9: Religious Separation and Attitudes About Islam Being Incompatible with Nationality	
Variable	Coefficient
France	.0217 (.036)
Religiosity	.0056* (.003)
Religious Separation (Ger and UK)	.137* (.024)
<b>France*Religious Separation</b>	<b>-.1055* (.045)</b>
Education	-.0015 (.002)
Ideology	.0512* (.008)
Reduce Immigration	.2149* (.018)
Proud of Nationality	.0322* (.022)
Constant	-.112 (.06)
R <sup>2</sup>	.125
N	2314
*Significant at $p < .05$ or better, one-tailed. Standard errors in	

Again, the interaction term isolating attitudes toward religious separation in France reveals a difference between the three countries in terms of how attitudes toward religion and government impact other attitudes. The significant negative coefficient for the France\*religious separation interaction indicates the relationship between religious separation and Islam/nationality is attenuated in France compared to Germany and the UK.

Table 10 and Figure 10 show the marginal effects of religious separation on attitudes toward Islam’s compatibility with nationality when isolating the impact in France. As noted in Table 10, the impact in Germany and the UK is statistically significant and positive, indicating that citizens in these two countries view Islam as incompatible with their nationality, controlling for other factors. In France, however, the impact is not significant. Figure 10 reveals this attenuated relationship quite clearly. This indicates that with regard to attitudes toward Islam being incompatible with nationality, religious separation behaves differently in France. In France, the impact of laïcité appears to help create a context where French respondents may feel that Islam poses less of a threat to their national identity than their counterparts in Germany and the UK.

Table 10: Average Marginal Effects – Religious Separation and Attitudes Toward Islam Being Incompatible with Nationality in France, Germany, and the United Kingdom	
Country	Marginal Coefficient
Germany and UK	.1371* (.024)
France	.0316 (.039)

Figure 10: Predictive Marginal Effects of Religious Separation - Islam Incompatible with Nationality Identity in France v. Germany and UK



The analysis of Issue 3 and Issue 4 in combination offer some indication that religion (in France) is not something generally thought of as part of nationality, and that this is consistent for both Christianity and possible concerns about Islam. With regard to Christianity, Table 7 indicates that French attitudes toward religious separation are significantly associated with decreased attitudes toward Christianity being important to French nationality (relative to Germany and the UK). The results in Table 10 reveal that whereas in Germany and UK attitudes toward religious separation from nationality become significantly more impacted when it comes to Islam, this is not the case for France, thus highlighting the distinctness of *laïcité* and attitudes toward religious separation, from any religion, in France.

This finding is especially interesting because it highlights the tension within the multiple interpretations of *laïcité* in France. In many cases, *laïcité* is used by the French government to defend certain laws, like the law banning the Muslim headscarf in public, marking *laïcité* a

concept used to defend *against* religion in the public sphere, thereby highlighting the neutral and secular French state (The Headscarf Debates, 2014: 19). As my research reveals, however, French citizens' seem to respond differently in their attitudes than the government.

Attitudes toward Christianity being important to national identity are *less* impactful in France relative to Germany and the UK. In that same vein, in Germany and the UK, there is a significant impact of religious separation on Islamic incompatibility with national identity. In France, there is not a significant impact in either direction. This shows that contrary to the government's apparent interpretation of Islam being seen as a threat, in France, when controlling for attitudes of national pride and immigration, attitudes are not strongly impacted by religious freedom to find Muslim incompatible with nationality. The heart of *laïcité* appears to be a strict separation of church and state, regardless of which church is being discussed. Of course, the headscarf issue is more specific and overt compared to the broader issue of national identity compatibility. Examining potential differences in the link between *laïcité* and general versus specific issues could be an avenue of interesting further research.

## **Conclusion**

My thesis has examined the impact of attitudes toward religious separation on four socio-political issues: support for abortion, support for same-sex marriage, the sense that Christianity is important to national identity, and attitudes toward Islam's incompatibility with national identity. Drawing from the literature that highlights the concept of "*laïcité*" in France as a distinct understanding of religious freedom, I hypothesized that the impacts of attitudes toward religious freedom would have different, and stronger, impacts in France on the socio-political issues relative to Germany and the UK.

To examine this issue, I used the Pew Research Center's data from their 2017 "Being Christian in Europe" survey and performed OLS regression analysis to isolate the hypothesized impact of attitudes toward religious separation in France. Using data in France, Germany, and the UK showed that, in general, attitudes toward religious and government separation have an impact on this set of political attitudes. Moreover, as hypothesized, *laïcité* did provide a cultural context in which attitudes in France were impacted differently. Notably, attitudes toward religious separation and its impact on support for abortion were statistically significant, highlighting the notion that abortion is considered a settled issue in France and not to be impacted by personal religious beliefs. While attitudes toward same-sex marriage did not lead to conclusive results, further research could be done on why same-sex marriage does not follow the same trend as a similar morality issue, such as abortion. Finally, my research showed that attitudes toward Christianity's importance to nationality were impacted by religious separation, as were attitudes toward Islam's incompatibility with nationality, and that the impact was significantly different in France. In France, it is clear that *laïcité* does provide a context that lessens the importance of Christianity and potential concerns about Islamic incompatibility with national identity, presumably because of the strong belief in *laïcité* as a clear separation between church and state and is inherent to being French.

These results lead to a further consideration of the various interpretations of religious separation throughout Western Europe, and provide a greater understanding for the impact that beliefs toward religious separation can have on various issues in a country. The results also support previous research that notes *laïcité* in France as a distinct phenomenon that has led to a difference between France and other Western European countries on attitudes toward specific issues.

Of course, there are limitations to any research. As noted previously, because of the ideology question used by Pew, to expand this research and include more Western European countries would require additional survey data. I am confident, however, that the trend concerning France revealed in this data will hold steady if more countries are included in the data. The independent variable, belief in religious separation, could also be improved if more questions were included in the measurement and an additive index were created that might allow for the question to be made more clear, and nuances from country to country to be better seen.

Overall, this research looked at attitudes toward religious separation on four different issues in France, Germany and the UK. Future research may find it worthwhile to look at the effects of countries that have no level of religious separation and compare and contrast the impact of attitudes toward various issues. This would allow for a greater understanding for the governmental and cultural components which impact attitudes in a country.

## References

“Being Christian in Western Europe.” (2018). Pew Research Center. Washington, D.C.

<<https://www.pewforum.org/dataset/western-europe-survey-dataset/>>

Bouvier Law Dictionary. Freedom of Religion. The Wolters Kluwer Bouvier Law Dictionary

Desk Edition, <https://advance.lexis.com/api/permalink/a551a1d7-4b9b-40be-9805-0277fec63612/?context=1000516>.

Casanova, Jose. (June 29, 2004). “Religion, European Secular Identities, and European Integration.” Transit 27. (Online Book).

Chelini-Pont, Blandine and Nassima Ferchiche. (January 11, 2017). “Religion and the Secular State: French Report.” Religion and the Secular State: National Reports, Publicaciones facultad derecho Universidad Complutense, pp. 309-331. < <https://hal-amu.archives-ouvertes.fr/hal-01432382>>

Ed. Scharffs, Brett G., Asher Moaz, and Ashley Isaacson Wooley. (2019). “Religious Freedom and the Law: Emerging Contexts for Freedom for and From Religion.” ICLARS Series on Law and Religion. Routledge Press.

Equal Rights Trust Organization. “The Preamble to the French Constitution of 1946.”

<<https://www.equalrightstrust.org/sites/default/files/ertdocs//Preamble%201946%20ENG.pdf>>

“French lawmakers vote to relax abortion legislation.” (2014). France 24. Online. <

<https://www.france24.com/en/20140122-france-lawmakers-vote-relax-abortion-legislation>>

- “French President Approves Gender Equality Law.” (May 8, 2014). Center for Reproductive Rights. Press Release. <<https://reproductiverights.org/press-room/french-president-approves-gender-equality-law>>
- Hunter-Henin, Miriam. (2012). “Why the French don’t like the Burqa: Laïcité, National Identity and Religious Freedom.” *International and Comparative Law Quarterly*, pp. 613-639.
- Kamenitsa, Lynn. (2002). Abortion Debates in Germany. In Dorothy McBride Stetson, *Abortion Politics, Women’s Movements, and the Democratic State: A Comparative Study of State Feminism*. Oxford University Press. Pp. 111-133.
- Korteweg, Anna C. and Gokce Yurdakul. (2014). “The Headscarf Debates: Conflicts of National Belonging.” Stanford University Press.
- Minkenberg, Michael. (2003). The policy impact on church-state relations: family policy and abortion in Britain, France and Germany. *26:1*, 195-217, DOI: <https://doi.org/10.1080/01402380412331300267>
- Modood, Tariq. (May 4, 2012). “Is There a Crisis of Secularism in Western Europe?” *Sociology of Religion*, *73:2* 130-149. Advance Access Publication.
- Ooijen, Hana Marie Agnes van. (October 19, 1980). “Religious Symbols in Public Functions: Unveiling State Neutrality.” *School of Human Rights Research Series*, Vol. 58. <[https://intersentia.com/en/pdf/viewer/download/id/9781780681191\\_0/](https://intersentia.com/en/pdf/viewer/download/id/9781780681191_0/)>
- Richardson, James T. (2015). “Managing Religion and the Judicialization of Religious Freedom.” Department of Sociology, University of Nevada. *Journal for the Scientific Study of Religion*: 2015.
- Robbers, Gerhard. (2001). “Religious Freedom in Germany.” *BYU Law Review*, Vol. 2001, Issue 2. <<https://digitalcommons.law.byu.edu/lawreview/vol2001/iss2/12>>



Schultheis, Emily. (2016). "Germany's cabinet approves revision to Nazi-era abortion law." The Guardian. <<https://www.theguardian.com/world/2019/feb/06/germany-cabinet-approve-revision-nazi-era-abortion-law-paragraph-219a-doctor-advertising-ban>>

Stepan, Alfred C. (2000). "Religion, Democracy, and the 'Twin Tolerations.'" Journal of Democracy, Volume 11, Number 4. John Hopkins University Press: October 2000, pp. 37-57 (Article).

T. Jeremy Gunn. (2004). "Religious Freedom and Laïcité: A Comparison of the United States and France," Brigham Young University Law Review. No. 2 (Summer 2004): pp. 419-506.

Universal Declaration of Human Rights. (1948). *United Nations*.

<[https://www.ohchr.org/EN/UDHR/Documents/UDHR\\_Translations/eng.pdf](https://www.ohchr.org/EN/UDHR/Documents/UDHR_Translations/eng.pdf)>