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The claimants have adopted two distinct lines of argument.

Counsel for Ms Eweida, Ms Chaplin, and Mr McFarlane have challenged the UK courts’ interpretation of the limits of Article 9. In particular they contend that the definition of ‘religious manifestation’ adopted in the Court of Appeal’s Eweida judgment erroneously requires that a religiously motivated act be doctrinally required by the faith in question before the act can be considered a religious manifestation. They contend that this interpretation is unduly restrictive and out of sync with more permissive Strasbourg judgements such as Jakobsen v Poland and Bayatyan v Armenia.

The Article 9 route is a difficult one. Even if the applicants convince the ECHR that wearing religious symbols and refusing to indirectly condone homosexuality should be considered religious manifestations within the terms of Article 9, a significant hurdle still awaits them in the form of the ‘free contract doctrine’. Those seeking to enforce Article 9 rights in the workplace consistently come up against the doctrine’s core contention: freedom of religion is guaranteed by the right to resign. In challenging the doctrine the applicants are hoping for a sea change in the Court’s interpretation of Article 9.

In contrast, counsel for Ms Ladele present their claim solely in terms of religious discrimination, citing Article 14 and stressing that their argument is not reliant on a violation of Article 9 being established. Where an interference with Article 14 has been found, the margin of appreciation determines the scrutiny of the justifications offered by the Government party. The absence of consensus on workplace religious manifestations would appear to favour the Government. However, a markedly different approach to justification of differential treatment exists where the discrimination involves certain suspect grounds. The recent comments of Judges Bratza, Hirvälä, and Nicolau in Redfern imply that religious discrimination is now considered to be a suspect ground requiring strong and weighty justification. The Court’s case law on gender, racial and sexual orientation discrimination illustrates the immense potential of Article 14 where a ground is judged to attract such strict scrutiny.

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Religious Rights in the Balance: Eweida and Others v UK
By Julie Maher | 16 January 2013

Yesterday’s decision of the European Court of Human Rights in Eweida and Others v UK [2013] ECHR 231 has been described as something of a ‘mixed bag’. By a margin of 5 votes to 2 the Chamber ruled that Article 9 of the European Convention had been infringed where a private company refused to allow a Christian employee to wear her crucifix at work. The ruling had the potential to influence the remaining applicants. The Chamber unanimously found that there had been no violation of Article 9, taken alone or in conjunction with Article 14 (prohibition of discrimination), as concerned Ms Chaplin and Mr McFarlane; and by five votes to two, that there had been no violation of Article 14 taken in conjunction with Article 9 as concerned Ms Ladele.

The Chamber found that, in relation to Ms Nadia Eweida’s case, English courts had failed to strike a fair balance between the religious freedom claimed by Ms Eweida and the rights of her employer to manage its workforce. The Court found that the strength of her employer’s justification was undermined by evidence that they previously authorised employees to wear items of religious clothing and by their subsequent alteration of the contested uniform policy to allow religious symbolic jewellery: [94]. As there was no evidence of interference on the interests of others, the domestic authorities accordingly failed to sufficiently protect Ms Eweida’s right to manifest her religion in breach of their positive obligations to secure the rights under Article 9 for those in their jurisdiction. The Court distinguished Ms Eweida’s case from the other religious symbol claim before them. They found that in relation to Ms Chaplin, a nurse who wished to wear a crucifix at work, the countervailing consideration – protection of health and safety at work – was ‘inherently of a greater magnitude’: [99].

The Chamber found that the English courts’ handling of the claims of Ms Ladele and Mr McFarlane to be fairly balanced. The Chamber contended that ‘the most important factor to be taken into account’ was the important and legitimate aim of the applicants’ employers in pursuing a corporate image. The Court adopted a two-step interference and justification analysis in such Article 9 cases, this confirmation of the appropriateness of a two-step interference and justification analysis in such Article 9 cases, alongside the tangible finding of an interference in Ms Eweida’s case, is a significant development.

Another important point was the Court’s rejection of the Government’s contention that no interference occurred because the practices in question were neither mandatory requirements of the religion, nor acts of worship that formed part of the practice of religion or belief in a generally recognised form. The Chamber stated that the latter quality is an example of the type of acts which may be considered manifestations of religion, but ‘the manifestation of religion is not limited to such acts’: [82].

The Chamber’s analysis of the specific facts of these cases and its scrutiny of the employers’ various reasons for refusing to accommodate their employees’ religious manifestations is itself highly positive. It is certainly a marked contrast with earlier cases such as Kostić, which gave little attention to the weave with which employees might have been accommodated. In addition the ‘general and neutral’ nature of the uniform provisions restricting Ms Eweida’s religious manifestation was no answer to the fact of interference.

In essence, the Chamber has recognised that there is a weight to be attached to the rights of religious persons engaged in the secular public sphere, and that a balance must be struck.

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Moreover, the Court also held that it was not disproportionate to discipline employees of public authorities and private companies for refusing to accommodate same-sex couples. Whilst the decisions themselves are commendable, one interesting feature of the case is the Court’s reliance on the margin of appreciation as conclusive of the balance between competing rights, without substantive investigation into what these competing rights actually were. For instance, in Ms Ladele’s case, the Court at paragraph 106 deferred to the national authorities’ margin of appreciation, despite explicit recognition that “the consequences for the applicant were serious,” and that “it cannot be said that, when she entered into her contract of employment, the applicant specifically waived her right to manifest her religious belief.” The partly dissenting opinion of Judges Žuvić and De Gaetano picks up on this. For instance, it notes that, in the case of Ms Ladele, her belief was a “concrete right to conscientious objection, which is one of the most fundamental rights inherent in the human person,” and that “she never attempted to impose her beliefs on others.”

Such a failure to engage with factual specificities of cases, whilst relying on an undefined “margin of appreciation,” undermines the credibility of the Court. This is most apparent when one compares the cases of Ms Eweida and Ms Chaplin. In both cases, the act of wearing a crucifix necklace was identical, yet in the case of a British Airways employee, disciplinary action was disproportionate, whilst in the hospital context it was not. The court distinguishes between the two cases by stating, at paragraph 99, that “the reason for asking [Ms Chaplin] to remove the cross … was inherently of a greater magnitude than that which applied in respect of Ms Eweida.” But this use of “inherent” magnitudes of countervailing interests is simply opaque. If health and safety is to be considered of greater importance than a company’s interest in its professional appearance, then the reasons for this must be explored. Whilst this conclusion is admittedly intuitively correct, for a Court whose legitimacy is under increasing threat, this won’t do.

A possible solution is hinted at in paragraph 94, where the Court refers to the fact that “there was no evidence that the wearing of other, previously authorised, items of religious clothing … had any negative impact on British Airways’ brand or image.” The Court should demand evidential justification from States when faced with claims that countervailing interests, or indeed rights, are of such great magnitude as to justify restricting Convention rights. This won’t be achieved if it simply relies on the margin of appreciation in order to avoid justifying the “inherent” weight accorded to competing rights and interests in particular cases.

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Corporate Gods: Can a Company Claim Protection for Religious Beliefs?
By Karl Laird | 3 January 2013

Does a profit making company owned and operated by people with strong religious beliefs fully share their right to the protection of those religious beliefs? This was the issue that the Court of Appeal for the Seventh Circuit was required to give a preliminary ruling on in Korte v Sebelius 735 F.3d 654 (2013).

Cyril and Jane Korte own Korte & Luitjohan Contractors, a secular, for-profit enterprise, that employs approximately 90 full-time employees. About 70 of the company’s employees belong to a union which sponsors their health insurance plan. K & L Contractors provides a group health insurance plan for the remaining 20 non-union employees. The Kortes are Roman Catholic and seek to manage their company in a manner consistent with their Catholic faith, including its teachings regarding the sanctity of human life, abortion, contraception and sterilization. In August, the Kortes discovered that the company’s current health insurance plan includes coverage for contraception and they sought to terminate this coverage and substitute for it a health plan that conforms to the requirements of their religious beliefs.

One of the features of the Patient Protection and Affordable Care Act (known colloquially as “Obamacare”) is that nonexempt group health insurance plans (such as that of K & L Contractors) must include all FDA approved contraceptive methods and sterilization procedures.

This includes oral contraceptives, such as the morning after pill. This mandate takes effect on Tuesday 1st January 2013. The Kortes sought injunctive relief in the District Court against the enforcement of the contraceptive mandate, alleging that it violated the Religious Freedom Restoration Act (“RFRA”) and the First and Fifth Amendments. After losing in the District Court, only the claim under the RFRA was pursued in the Court of Appeals. In a 2 to 1 decision, the injunction was granted.

The RFRA prohibits the Federal Government from imposing a “substantial burden on a person’s exercise of religion even if the burden results from a rule of general applicability” unless the government demonstrates that the burden (1) is in furtherance of a compelling governmental interest; and (2) it is the least restrictive means of furthering that compelling interest. This is a test of strict scrutiny and the majority held that the Kortes established that they had some likelihood of success on the merits.

What is of especial interest is the majority’s rejection of the Government’s argument that no rights under the RFRA were implicated at all, given the company’s status as a secular, for-profit enterprise. It was held that such an argument ignored the fact that the Kortes were also plaintiffs and that they owned 88% of the company. Much emphasis was placed on the fact that K & L Contractors is a family run business managed in accordance with the Kortes’ religious beliefs. Utilising the Citizens United Case as precedent, it was held that the fact that the Kortes operate their business in a corporate form was not dispositive of their claim. This seems to suggest that the company itself has rights under the RFRA, irrespective of its secular nature. This is an issue that Justice Sotomayor recently confirmed the Supreme Court has yet to address.

Whether the Seventh Circuit will uphold its initial ruling in the full hearing in the New Year remains to be seen. The case is interesting as the finding of the majority of the Court of Appeals can be contrasted with the position under Article 9 of the ECHR, which has been held to be a right that by its very nature is only exercisable by natural persons in contrast to other rights such as those enshrined in Article 10. Should the Court find for the Kortes on the merits, this would represent a significant expansion of the rights that secular, for-profit enterprises can invoke under US law.

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R (Hodkin): A Signal to Rethink Religious Worship
By Ilias Trispiotis | 20 January 2013

In R (on the application of Hodkin) v Registrar General of Births, Deaths and Marriages [2012] EWCH 3635 the High Court acknowledged that a broader definition of worship should be part of the future judicial agenda. That could be a positive step, especially vis-à-vis non-theistic religions.

One of the issues the Court of Appeal for the Seventh Circuit heard in August 2012 was whether the London Church of Scientology Chapel was a place of worship. The chapel is not registered under section 2 of the Places of Worship Registration Act 1855 (1855 Act) as a place of meeting for religious worship, which entails that it may not be registered under section 26 of the Marriage Act 1949 for solemnisation of marriages. The claimants applied for judicial review of the decision of the Registrar General of Births, Deaths and Marriages refusing to register the chapel under the 1855 Act. The Registrar relied on R v Registrar General ex parte Segerdal [1970] 2 QB 697 (“Segerdal”) where the Court of Appeal had refused to register another Scientology chapel. In juxtaposition, the claimants stressed that Scientology had evolved since 1970s, and they argued that the current multi-faith society commanded a more expansive approach on the definition of places for religious worship in order to equally accommodate non-theistic religions.

The High Court followed the Segerdal approach, according to which a place for religious worship covers places for non-theistic religious worship. Thus, whether Scientology does qualify as a religion under the 1855 Act is not decisive. Rather, the crucial factor is whether Scientologists worship, or they worship but outside the scope of a religion. According to Segerdal, worship requires an object of veneration, whether Being, principle, or law. Belief or aspiration to achieve an end, such as Scientology’s focus on the spirit of man, is not enough. Hence, the Scientology chapel should not be registered because it is not a place of meeting for religious worship. In the absence of evidence establishing that Scientologist worship has significantly changed since the 1970s, the High Court found Segerdal still binding.

Nonetheless, the judgment acknowledged that the Court of Appeal might need to reconsider its approach to religious worship in the future.

The High Court gave two main reasons for that. First, it is difficult to separate worship from religion. The issue should be treated as a whole since the reasons why a service does not constitute worship are interlaced with the reasons why a belief system is not a religion. Second, the Segerdal approach seems inadequate with regard to non-theistic beliefs. For it involves a definition of worship which revolves around ceremonies or formal acts revering a supernatural or divine power or principle. That might place an inappropriate limitation on the scope of religion in modern legislation.

Notably the European Court of Human Rights (‘ECHR’) has held in Kimlya v Russia (App. No.: 78636/01) that there is no consensus in Europe on whether Scientology is a religion. Nevertheless, it is significant that both the ECHR and the UN Human Rights Committee – paragraph 4 of the UN General Comment 22 is indicative – have consistently favored a generous interpretation of worship not confined to institutional forms of religious manifestation or traditional beliefs.

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Between a Crocodile and a Snake: Racism and Religious Intolerance in Burma
By Benedict Rogers | 30 April 2013

After fifty years of repressive military rule, Burma is just beginning to open up. In the past year, democracy leader and Nobel Peace Prize Laureate Aung San Suu Kyi has been elected to Parliament with 42 of her colleagues in the National League for Democracy. Along with this extraordinary development, media freedom, space for civil society, and freedom of expression have all increased, particularly in Rangoon. For the first time in more than two decades, Burma has a real chance of change.

However, the transition is only just beginning, and there is a very long way to go. Repressive laws remain in place and the campaign against remembered atrocities continues. Meanwhile, new challenges surfacing in the slow transition threaten to derail promising reforms in their infancy.

Burma is a multi-religious nation with seven major ethnic groups. The non-Burman members of the population collectively 40 per cent of the population, and inhabit 60 per cent of the land mass, mostly around the country’s borders. For decades these groups have faced discrimination and persecution—some, such as the Karen, have faced conflict for more than 65 years.

In addition, Burma has a sizeable Muslim minority, who fall into three racial categories. Of these, the Burmese and the Arakan Muslims are citizens, although subjected to racial and religious discrimination by some. The Rohingya, however, were stripped of their citizenship under the 1982 Citizenship Law, and are regarded as ‘foreigners’ or ‘illegal immigrants’, despite evidence that many Rohingyas have lived in Arakan State for generations. Indeed, the government, and many in society, refuse to even recognise the name ‘Rohingya’, insisting on calling them ‘Bengali’.

Yet Bangladesh does not recognise them either, and refuses to receive Rohingyas fleeing persecution. There are 200,000 Rohingya refugees in camps in Bangladesh, but in recent years, Bangladesh has turned many away. When I visited the camps in 2008, a refugee told me: ‘The Burmese say we are Bengali, go back to Bangladesh; the Bangladeshi say we Burmese, go back to Burma. We are trapped between a crocodile and a snake. Where do we go?’

The Rohingyas are a stateless people.

Last summer, the marginalisation and persecution of the Rohingyas reached unprecedented intensity when violence in June and October, left many dead and over 130,000 displaced. Human Rights Watch released a report this week describing the crisis as ‘ethnic cleansing’ involving ‘crimes against humanity’.

Anti-Rohingya hatred has now turned into wider anti-Muslim violence. I was in Burma when the carnage in Meiktila occurred, and then anti-Muslim pogroms spread. I visited a small Muslim community in a village outside the capital, Naypyidaw, whose mosque had been desecrated and madrassah completely burned down. I heard the hate speech spread by a militant Buddhist monk, U Wirathu, and the movement known as “969”.

While racial and religious prejudice is deep-seated and widespread in Burmese society, attitudes towards the Rohingyas are largely based on misinformation; the widespread belief that they are illegal immigrants pouring across the Burma border stems from years of propaganda by the regime. Campaigns of such violence and destruction have been well-planned and orchestrated.

For example, the 2013 United Nations Alliance of Civilizations annual meeting featured the Award for Intercultural Innovation, which aimed to identify the most innovative grassroots projects that encourage intercultural exchange – including interfaith dialogue – around the world. Pew Research finds that interfaith dialogue is the most common way the human rights community seeks to bring about better relations among members of different religions.

So, too, is the wide anti-Muslim violence seen in recent weeks. The suspected aim of instigating old prejudices and fanning fears of instability is that Aung San Suu Kyi’s position is undermined; the 2015 elections are either cancelled, delayed or won by the military-backed Union Solidarity and Development Party (USDP); or the military takes direct power. The people of Burma, and the international community, which has stayed so much on President Thein Sein’s reforms, cannot afford to let that happen.

Action must be taken. Pressure must be increased on Thein Sein to ensure that the culture of impunity ends, and those responsible for fomenting or perpetuating hatred and violence are brought to justice. Humanitarian aid must be provided for the displaced victims, with unhindered access. A serious review of the 1982 Citizenship Law is imperative, as are amendments to align it with international standards. Significant investment in inter-religious and inter-ethnic dialogue and reconciliation, anti-racism awareness programmes, public education and other initiatives to tackle intolerance must be made, and the extreme Burmese Buddhist nationalistic ideology should be replaced by a recognition of Burma’s ethnic and religious diversity, and the development of a political system that safeguards equal rights for all.

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Religious Freedom: A 21st Century Paradigm
By Brian J. Grim | 7 December 2013

The Pew Research Center’s studies on global restrictions on religion have played a role in shifting discussion from the 20th century paradigm of religious freedom, which focused primarily on the types of government restrictions seen in communist countries, to a 21st century paradigm that recognizes that the actions of societal groups can affect religious freedom as much as, and perhaps even more than, government actions.

The findings of the studies show that 40% of the world’s countries have high restrictions on religion, and because several of these countries are very populous, this amounts to three-quarters of the world’s population.

These findings are based on a comprehensive analysis of 198 countries and territories. Annually since 2006, the Pew Research Center (“Pew Research”) has carefully studied the laws and constitutions of each of these countries as well as human rights reports from major international sources. Based on these sources, Pew Research staff count and categorize each government restriction on religion and each reported social hostility involving religion.

Examples of government restrictions include:
- restrictions on the wearing of religious symbols, which exist in more than a quarter of all countries. For instance, the European Court of Human Rights recently found that British law does not adequately protect an employee’s right to display religious symbols in the workplace.
- prison sentences for religious believers in response to actions motivated by their faith, which occur in nearly a third of all countries. In Burma, for example, Buddhist monks continue to languish in prison for their promotion of human rights and democracy.

Examples of social hostilities involving religion include:
- sectarian violence, which occurs in 17% of countries worldwide. In Iraq, for instance, even though the civil war ended years ago, acts of sectarian violence continue to occur almost daily.
- religion-related terrorists, who are active in more than a third of countries worldwide, including in France, where a Rabbi and Jewish children were gunned down in a brazen act of terror in March 2012.

Pew Research studies divide the world into five major regions – the Americas, sub-Saharan Africa, Europe, Asia-Pacific, and Middle East-North Africa – to examine broad geographic patterns. In each region, religious restrictions and social hostilities increased over the course of the five-year study. But restrictions rose most substantially in the Middle East-North Africa region – including through 2011, when the political uprisings known as the ‘Arab Spring’ occurred.
Taking Conscience Seriously
By Ronan McCrea | 26 November 2013

Ladele, one of four claims brought in Eweida and Others v UK (2013) [2013] IRLR 231, exemplifies an important public debate: has the embrace of gay equality by the liberal state become oppressive towards free conscience rights?

Ms Ladele’s claim was based on both religious freedom, and protection of what one wants and to follow one’s beliefs, with the damage that acts of discrimination can cause?

The appeal, which was led by the Attorney General of Malaysia on behalf of the Malaysian Government, emanated from a 2009 decision of the High Court wherein The Herald had called for a judicial review of the power of the Home Minister to place conditions on the use of the word “Allah” in Malay. The High Court had held in favour of The Herald, and while the decision was generally lauded for its liberal appeal, it sparked off numerous attacks on churches and mosques.

The Chief Justice of the Court of Appeal, reversing the 2009 decision, opined that, “The usage of the word Allah is not an integral part of the faith in Christianity. The usage of the word will cause confusion in the community.”

The recognition of the right to believe in a religion, or to not believe in one, is assured, the damage to dignity inherent in acts of discrimination is sufficient to warrant overriding individual conscience. But if we are to take conscience seriously then we protect the right to conscience not the right to particular, relatively popular forms of conscience. It is important for both sides to acknowledge the difficulties of the positions they espouse. Those who come down on the side of anti-discrimination are swayed by the broad use of the word “Allah” to denote God. Those on the side of conscience must swallow hard and say “it is conscience that we are respecting, it cannot only be popular and palatable conscience and my position means that we must accommodate the racist and the bigot too”.

Ms Ladele’s lawyers argued that a balance had to be struck. They accepted that it was necessary to ensure that gay couples were able to access registration facilities but said that, once they could do so, to require all registrars not to discriminate so as to prevent the harm to human dignity inherent in acts of discrimination was disproportionate. This is where they failed to take conscience seriously. One can make the argument that dignity is not sufficiently important to outweigh conscience and that therefore discriminatory acts should not be prevented once the relevant service is provided.

The legalization of gay marriage is troubling for many and the extension of anti-discrimination norms to cover sexual orientation may force many into painful dilemmas as to how they reconcile their deeply held and sincere beliefs with the duty not to discriminate. Such dilemmas are nothing new. They have lain at the core of anti-discrimination law since its inception: how to reconcile respect for the right to believe what one wants and to follow one’s beliefs, with the damage that acts of discrimination can cause?

The inclusion of sexual orientation as a protected characteristic affects beliefs that a significant number of Christians hold.

Free conscience deserves to be treated seriously. It is not beyond doubt that, once provision of a good or service to individuals is assured, the damage to dignity inherent in acts of discrimination is sufficient to warrant overriding individual conscience. But if we are to take conscience seriously then we protect the right to conscience not the right to particular, relatively popular forms of conscience. It is important for both sides to acknowledge the difficulties of the positions they espouse. Those who come down on the side of anti-discrimination are swayed by the broad use of the word “Allah” to denote God. Those on the side of conscience must swallow hard and say “it is conscience that we are respecting, it cannot only be popular and palatable conscience and my position means that we must accommodate the racist and the bigot too”.

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The Chief Justice of the Court of Appeal, reversing the 2009 decision, opined that, “The usage of the word Allah is not an integral part of the faith in Christianity. The usage of the word will cause confusion in the community.”

This demarcation of so-called Muslim jurisdiction over the word “Allah” is not only deeply flawed but also antithetical to the term’s etymological origins. Notwithstanding the divergence of opinion among scholars with respect to the word’s Sanskrit, Hebrew or Aramaic derivation, the word “Allah” has been used to denote a supreme being since pre-Islamic times. Archaeologists have discovered inscriptions on tombs and in the ruins of churches in the Middle East where Aramaic and Arabic speaking Jews and Christians lived, with proper names often being compounded with “Allah.”

Moreover, since the first centuries of Islam, Jews, Christians and Muslims alike have routinely employed “Allah” in their citations and translations of the Bible. The term “Allah” has been used not only in Arabic translations of the Bible, but also in other languages across the Middle East, Africa and most of Asia. The first Malay rendering of the Bible dates back to 1629, when a Dutch tradesman translated the Gospel of Matthew into Malay, using the word “Allah” to denote God.

Thus, Malaysia’s usurpation of the term “Allah” runs deeper than a mere linguistic spat and epitomizes an insidious political and religious ideology that is being imposed on Malaysia, a predominantly Islamic nation, by a Christian minority. Malaysia’s political and constitutional fabric. The Government’s eagerness to appeal the High Court’s 2009 decision demonstrates that Prime Minister Najib Razak’s ruling coalition that suffered its worst result in more than half a century in power in elections this May has had the divisive “Allah” issue to re-solidify its political stronghold among Sunni Malays, which constitute two-thirds of the country’s population.

Malaysia’s path towards initiating a religio-lexical crusade masquerading as protecting public discord and the interests of Islam bears an uncanny resemblance to Pakistan’s treatment of religious minorities, notably the Ahmadiyya Muslim Community (a minority Muslim sect (also referred to as Qadianis) deemed heretical by mainstream Muslims). The Supreme Court of Pakistan in 1993, in a controversial decision, imposed restrictions on the community’s use of the term’s “Azan” (meaning the call for prayer) and “Masjid” (an Urdu term used to denote a mosque), ruling that such terms were peculiar to Islam. The apex court went so far as to hold that these terms formed part of Islam’s intellectual property and that the State could prevent their usage by other religious communities.

In choosing a path that echoes Pakistan’s deepening sectarian tension, the Malaysian court’s decision signals the increasing dilution of its multicultural society. A state sanctioned affirmative action programme according special rights to ethnic Malays has already been in place since the 70’s that has led to the marginalization of Malaysia’s minorities. Pertinently, but more serious, is the Malaysian political and ideological decision to ban the use of a term that is not Islam’s birthright from the country’s Christians, raises vexed questions with respect to what it entails for Ahmadis in Malaysia, who have routinely had their mosques and buildings raided and their villages razed. A council-erected sign outside one of their buildings reads, “Qadianis are not Muslims.”

This rising global trend of impudence and intolerance on the part of Muslim leaders and governments is being juxtaposed with a trend that has found its home not in terrorist hotbeds but in malignant political and religious ideologies. The world’s preoccupation with militant Islam has brushed to the periphery the pervasiveness of such ideologies that are becoming increasingly rampant in countries such as Pakistan, India, Indonesia, Malaysia and Bangladesh. These nations are pursuing a dangerous path towards a divinity winged with paradox. They can learn from Pakistan’s example that has spiraled into national and international anarchy at the hands of the oxymoron of Islamist extremism. They can instead learn from Pakistan’s example that has been a multicultural and multi-religious fabric before such ideologies ran wild.”

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