Universal or Particular or Both?
The Right to Freedom of Religion or Belief in Cross-cultural Perspective

■ Erin Wilson and Christoph Grüll | 17 July 2018

Summary

The right to Freedom of Religion of Belief (FoRB) is a focus of increasing concern and debate in academia, in public, and in international policy. A key point of contention is whether there exists any such thing as a universally recognized right to FoRB. This paper engages these debates through an exploration of how FoRB is understood across three different contexts – the North Atlantic, India, and Indonesia. The central argument of this paper is that the language of FoRB is not universal, but across different cultures there exist concepts, philosophies, and embodied practices that are consistent with what in Western contexts would be understood as the right to FoRB.

The paper pursues this argument in three stages. First, the paper engages the main views at stake in recent debates over whether FoRB is 'universal' or '(im)possible' amongst scholars and practitioners, including outlining core assumptions about 'religion' and 'rights' that often sit at the heart of these debates. Second, the paper discusses perspectives on FoRB in Gujarat, India and Cirebon, Indonesia, drawing on ethnographic fieldwork in both contexts. Finally, the paper considers the implications of this study for policy on FoRB.

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Universal or Particular or Both?
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The right to Freedom of Religion or Belief (FoRB) is a topic of increasing concern and debate in academia, in public and in international policy. This is evident by a growing number of national, inter-governmental and civil society initiatives focused on promoting awareness of FoRB.[1] Attention for the right to FoRB has been present in international human rights instruments at least since the Universal Declaration of Human Rights (UDHR) in 1948, if not earlier. This attention was further cemented with the creation of the UN Special Rapporteur on Religious Intolerance in 1986 (subsequently made the Special Rapporteur on Freedom of Religion or Belief in 2000). However, the recent surge of efforts that focus explicitly, primarily and sometimes exclusively on FoRB, were all arguably precipitated in some sense by the introduction of the International Religious Freedom Act in the United States in 1998. There have also been a number of scholarly publications on FoRB in recent years. Some of these publications uphold the idea of FoRB as a universal right that must be promoted and protected worldwide (e.g. Hertzke 2012), while others are critical of the idea of FoRB when it is based on a category that is as fluid and unstable as 'religion' (e.g. Sullivan 2005; Hurd 2015).

This disagreement highlights a key point of contention within both scholarly and policy debates on the right to FoRB, that is, whether there exists any such thing as a universally recognized right to freedom of religion or belief (FoRB). Two elements are crucial to this disagreement:

1. the different understandings of 'religion' that are involved—whether religion is clearly identifiable and distinguishable from other human activities, deserving of its own right and protection of that right, or whether 'religion' is essentially a problematic and contested idea which makes the promotion and protection of a right to FoRB, along with the protection of religious minorities more generally, highly problematic;

2. the contested nature of the language of 'rights' in multiple contexts, including tensions between individual and collective rights, particularly on an issue such as 'religion'.

This paper engages these debates through an exploration of how FoRB is understood across three different contexts—the North Atlantic,[2] India, and Indonesia. Utilizing a mixed methods approach, the paper suggests that to an extent both perspectives outlined above have merit, but with multiple caveats. The central argument of this paper is that the *language* of FoRB is not universal. Nonetheless, concepts, philosophies and embodied practices of honouring the traditions of others and living together in harmony and peace exist across different cultural contexts. These concepts and practices are consistent with what in the US, Canada and Europe might be phrased as 'religious freedom' or 'the right to freedom of religion or belief', but are articulated and pursued in language and frames consistent with local history, culture, politics and ways of life. It is essential to find ways of incorporating this rich diversity of languages, cultures, histories and practices, relevant to specific contexts, in research and policy on FoRB, but also on human rights more generally.

The paper pursues this argument in three stages. First, the paper engages the main views at stake in recent debates over whether FoRB is 'universal' or

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[1] These include, but are by no means limited to, the UK All Party Parliamentary Group on International FoRB (established in 2012), European Union's Guidelines on the Promotion and Protection of FoRB (2013), International Panel of Parliamentarians for FoRB (2014), the Canada-led International Contact Group on FoRB (2015), European Parliament's Intergroup on FoRB & Religious Tolerance (2015), Commonwealth Initiative on FoRB (2015), and Ruddock inquiry on religious freedom in Australia (2018).

[2] We are aware there are significant and important differences in how FoRB is approached on opposite sides of the Atlantic, as well as within Europe and between the US and Canada. We outline some of these in the paper. However, we contend that these differences are less relevant and less obvious outside the transatlantic context, which is why, for the purposes of this paper, we discuss it as one context.

'(im)possible,' outlining core assumptions about 'religion' and 'rights' that often sit at the heart of these debates, particularly in Western contexts.[3] Second, the paper discusses perspectives on FoRB in Gujarat, India and Cirebon, Indonesia, drawing on ethnographic fieldwork in both contexts. Despite the socio-political, cultural, economic, and religious differences in each context, three key findings emerge from across the two sites:

1. the interpretation and adaptation of FoRB relevant to the local context, including adaptations around 'religion' and 'rights';

2. the incorporation of local language, wisdom, and practices in programs aiming to promote respect for the right to FoRB; and

3. the importance of direct encounters amongst people across socio-political divides and of building relationships of trust.

Finally, the paper outlines insights from this study relevant for domestic and foreign policy on FoRB.

Method and Caveats

The ethnographic research in Gujarat and Cirebon relied on participant observation and semi-structured interviews for data collection. Researchers spent three months in each location. In total, 165 people were interviewed across 91 individual and group interviews. People interviewed included local NGO staff and community organizations running programs on FoRB and local residents participating in the programs.

It is important to stress the limitations of this research. The project was conducted in two locations. While the findings provide important insights on translation and interaction across multiple levels of politics (local, national, international, governmental, global civil society and local civil society), the methods and approaches utilized are specific to Gujarat and Cirebon. Context is crucial and so researchers and policymakers must be careful not to overly generalize the projects and strategies that were effective in these locations to other locations. Nonetheless, common themes did emerge across the two sites. As such, we suggest that there may be approaches and principles that could potentially be applied in other contexts, even if the way they are implemented needs to be quite different. This finding, however, requires further research for confirmation.

Further, not only the geographic context but also the audience context matters. In each location, there were some groups of actors for whom the language of rights and of FoRB was not problematic. Indeed, many activists consider human rights a crucial tool for pursuing the equality and dignity of all human beings. Our argument in this paper is not to deny that power and the importance of human rights in pursuing that goal. For other actors in each location, however, the language of rights and of religion was a significant barrier to cooperation and engagement on working together and living together in harmony. At the same time, it is important to stress that we are not arguing for a cultural relativist perspective. Our point is not to intimate that human rights language should be dispensed with. Rather, our purpose is to suggest that there are times and places where other concepts and practices could be more effectively engaged with in order to promote human dignity. Context sensitivity is not the same thing as cultural relativism.

Our research focused primarily on local NGOs and the communities with which they engaged, not diplomats or state institutions. We suggest, however, that the strategies and insights gained through research amongst NGOs is also useful and applicable for those working in or with state institutions.

It is also important to emphasize that what we are advocating is an approach, first and foremost, of mutual learning, cooperation and humility in the pursuit of upholding and honouring the equality and dignity of all.

FoRB: Inalienable universal right or impossibility?

Debate over FoRB has intensified in academic and policy circles in recent years. This is in part a response to increasing attention for FoRB by government departments. While multiple positions, perspectives and approaches exist on the question of the right to FoRB, these tend to fall somewhere along a spectrum between those who believe FoRB is a universal inalienable right that should be upheld and protected at all times and in all places (Philpott 2013; Philpott and Shah 2017: 383; Hertzke 2012; Grim and Finke 2011) and those who view the right to freedom of religion or belief as 'impossible', or at the very least problematic, for multiple reasons (Sullivan 2005; Hurd 2015; Mahmood 2016; Mahmood and Danchin 2014). As a shorthand, we shall refer to these two positions as 'defenders' and 'critics' of the right to

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[3] We are aware of the problems inherent in the terms 'West' and 'Western'. We use it here for the sake of brevity to refer primarily to Europe, Canada, the USA, the United Kingdom, Australia, and New Zealand.

FoRB, bearing in mind that these are the dominant views and multiple others also exist. The disagreements between defenders and critics seem to rest on three interrelated issues:

1. the question of how to define and understand 'religion or belief';

2. The concept of 'rights'; and

3. The application of both 'religion' and 'rights' to individuals and/or communities.

The most fundamental difference between the various approaches and arguably also the one from which the other disagreements stem is the question of how to define and understand 'religion'. Two main views exist amongst scholars and practitioners on this issue. The first view is that 'religion' can be clearly identified and defined. While it may not be possible to have a universally applicable and agreed on definition of religion, we 'know it when we see it' and as a result it is possible to defend the right to freedom of religion or belief. The question of how to define 'religion' is rarely discussed by scholars and activists who hold this view, rather taking for granted that when they use the term 'religion', people will understand what they mean.

Conversely, it is precisely the difficulty of arriving at a universally agreed definition of religion that critics of FoRB point to as evidence of the problematic nature of the right to FoRB. 'Religion', they highlight, is a fluid, relatively modern concept, a product of the Enlightenment and the emergence of secular ways of thinking that established 'religion' as something that can be neatly and cleanly distinguished from other realms of human activity (Asad 2003; Sullivan 2005; Hurd 2015; Wilson 2012; 2017). The idea of 'religion' embodied in the right to FoRB, they argue, also emphasizes the individual and cognitive aspects of belief, a highly Westernized, Christian (arguably Protestant) way of conceptualizing religion that does not necessarily resonate across other contexts. The lack of a universally agreed definition of 'religion' means that in legal cases involving potential violations of FoRB, it is often the personal view of the judges regarding what 'religion' is and what 'essential' religious practice is that can determine how a case is decided (Beaman 2013; Berger 2007; Sullivan 2005). The highly subjective nature of FoRB, then, leaves it open to abuse and manipulation by different actors in practice, however noble the intention of the right in theory may be. This distinction between the *principle* and the *practice* of FoRB is also a crucial point of difference between defenders and critics of FoRB (Philpott and Shah 2017), or as Schonthal (2015: 150) puts it, the 'separation of aspired-to ideals from degenerate realities'. Defenders of the right to FoRB

argue that the principle remains valid even when practice falls short of the ideal. Critics, on the other hand, argue that it is the principle itself, in the way that it is expressed and conceptualized, which contributes to failings in practice.

A second point of contention is the language of rights themselves and the widely contested view of the legitimacy of human rights as universal norms or as a specific historic and cultural construct of the 'West', imposed by European and North American powers on unwilling populations in the Global South. The critiques of the concept of 'religion' and of 'rights' clearly overlap here. Scholars have written *ad infinitum* on the question of whether human rights are a product of the modern West or a fusion of influences from multiple different cultures, philosophical and ethical traditions from across time and space (see, for example, Adami 2012; Ishay 2008; Donnelly 2013). The disagreement over the philosophical and cultural origins of contemporary human rights also surfaces in political discourses, used as a justification for resisting or rejecting the implementation of certain rights in particular countries, most often concerning the rights of girls and women, the rights of LGBTQI persons, the right to freedom of expression, and the right to freedom of religion or belief.

A third important point of disagreement concerns the tension between individual and communal rights, a disagreement that affects all rights, not just FoRB. In the context of FoRB, however, this tension is exacerbated by competing understandings of the concept of religion. In European and North American contexts, 'religion or belief' is often understood in an internal, cognitive sense, as the right of an individual to choose to believe or not in a particular set of doctrinal principles or creeds. Yet this rather cognitive understanding of 'religion or belief' is often not consistent with concepts, understandings and practices of 'religion' in areas outside the West. Amongst some communities in India and Indonesia, for example, 'religion' is often understood as communal identity, as belonging to a particular group. This belonging may be based on family, culture, birth and upbringing rather than an (optional) intellectual decision to believe or not. In such contexts, an individual may have multiple 'religious' affiliations, in the sense that they may be culturally 'Muslim', for example, but their individual beliefs may be atheist or Christian (Mahmood 2016). This adds significant complication to understandings and applications of the right to FoRB.

A significant dimension of international discourses and disagreements around FoRB are the transatlantic distinctions in the language, histories

and conceptualisation of this right. In the United States, the right is often expressed as the right to 'religious freedom', whereas Canada, European countries and the European Union in particular have been careful to express the right as the right to 'freedom of religion or belief'. Some actors within global politics have also often seen the language of 'religious freedom' in the United States and as part of US foreign policy as 'Christianity by stealth' (Castelli 2007). This is an important reason why European actors have sought to distance themselves somewhat from 'religious freedom' and instead adopt 'FoRB'. It is also important to highlight that the right to FoRB as expressed in article 18 of the Universal Declaration of Human Rights encompasses not just religion, but also freedom of thought and conscience. As such, this right arguably encompasses not just 'religious' beliefs, but political and philosophical beliefs and values. The shorthand of 'religious freedom' or even 'religion or belief' may at times obscure this distinction. The language of the right is, however, broad, vague, and open to interpretation.

These distinctions between 'religious freedom' and 'Freedom of Religion or Belief', as important as they are in the transatlantic context, are often obscured in broader global political conversations around the right to FoRB. The implication is that, whether using 'religious freedom' or 'FoRB', the connotation is the same for many actors external to the transatlantic context. It is also significant that the recent surge in attention for FoRB by Western powers has formed part of a wider package of policy initiatives under the label of 'countering violent extremism' (CVE), with FoRB presented as something of an antidote to conflict and violent extremism (e.g. Grim and Finke 2011; Henne, Hudgins and Shah 2012) whereas Mandaville and Nozell (2017) note that CVE has the potential to proscribe certain kinds of beliefs and practices and consequently restrict individual rights to FoRB. The vast majority of CVE initiatives are directed towards Muslim populations within Western contexts and towards Muslim-majority countries. As such, the renewed interest in FoRB as part of this swathe of policies is viewed with suspicion by some governments and civil society actors. This does not mean, however, that these actors are hostile to the value of respecting diversity and difference that sits at the core of FoRB, as we indicate in our discussion of the Indian and Indonesian cases.

Two key points can be drawn from these differences in scholarly and political conversations around FoRB. Firstly, these disagreements are unlikely to ever be resolved. Rather, we propose a pragmatic approach that acknowledges the differing perspectives on FoRB and is sensitive to those perspectives in research, policymaking, and project design and implementation. The second and related point is the centrality of context for scholarly engagement and policy development on the right to FoRB. FoRB has different connotations depending on the audience and the location. Whether the language of FoRB is effective for achieving the broader goal of equality and dignity for all human beings needs to be assessed relative to the political, cultural, environmental, and economic context and the specific actors involved. Values related to FoRB are articulated in different ways, including: respect for difference and diversity; harmonious living together; and respect, equality, and dignity for all human beings. There is an urgent need for greater attention to these different articulations and practices in the contemporary globally integrated and interconnected political landscape, as we highlight through the discussion of the cases in the next section.

Understandings of FoRB in Cirebon, Indonesia and Gujarat India

The research we present here was undertaken in 2015 in collaboration with Mensen met een Missie (MM), a Dutch faith-based development agency. MM had received funding from the Dutch Ministry of Foreign Affairs to implement programs and projects designed to promote the right to FoRB in cooperation with local partner organizations in Cirebon, Indonesia and Gujarat, India, areas with significant levels of religious diversity amongst the population and where conflict had occurred, directly or indirectly, as a result of intolerance for religious difference. MM had begun working with local partners on the initiatives, but had already encountered challenges regarding the translation of the right to FoRB in the local context. The local partner organizations were Muslim (Cirebon), Hindu (Gujarat), and interfaith initiatives, which had built up significant levels of trust among different communities through consistent work over many years. These organizations focused on reaching youth and local leaders and creating spaces for encounter amongst people from different religious traditions. Their programs include educational projects and dialogues with the aim of empowerment and enhancing social cohesion and trust.

MM's intuition was that the right to FoRB as expressed in European contexts and by European funders did not resonate in the contexts in which their partner organizations were operating. In consultation with two staff members from MM, we developed the research design so as to explore how

religious difference and diversity were conceptualized amongst grassroots actors in Cirebon and Gujarat. This required developing questions for the semi-structured interviews that did not explicitly mention FoRB or even 'religion' necessarily, since we wanted to avoid pre-empting or directing interlocutors towards the use of particular language that they thought we may want to hear. Participant observation thus became a crucial additional tool, allowing the research team to witness how actors spoke with each other about these issues and participate in informal conversations, which were themselves highly revealing as to how 'religious difference or diversity' was understood and articulated by local actors on the ground.

While Cirebon and Gujarat are significantly different in terms of context and dynamics, commonalities in approach nonetheless emerged. We identified three key themes that characterize the work of the local partner organizations implementing projects to promote the right to FoRB.

'Breaking down FoRB': interpreting and adapting 'FoRB' and 'religion' for local contexts

In both Cirebon and Gujarat, staff working with MM's local partner organizations had to, in their words, 'break down' the language around FoRB in order to make it more acceptable and accessible to people in the local environment. In Cirebon particularly, this need to diffuse the language of FoRB arose from both local and global dynamics.

i. Local dynamics. The language around FoRB is especially sensitive with regard to freedom and pluralism. A number of organizations and political actors take issue with 'freedom' since religion is less a matter of choice than one of collective and individual identity. Similarly, 'pluralism' in Indonesia is often understood as a blending of different religions, compromising the 'purity' of doctrine. Consequently, 'freedom' and 'pluralism' are more likely to be understood as 'Western' concepts and impositions by foreign actors. For this reason, while the local partner utilizes the language of FoRB in internal discussions and documents, they deliberately avoid referring to it in their workshops and programs, choosing instead key words such as 'tolerance', 'diversity' and 'differences', which are more acceptable in broader social narratives than 'freedom' and 'pluralism'.

ii. Global dynamics. The program takes place in a social environment in which the predominant concern is not violent conflict but rather addressing the precursors/palpable tensions between groups that may give rise to (violent) conflict in the future. Cirebon has more radical Islamic activity than many other areas of Indonesia. As such, there is strong emphasis on potential risks of radicalization, often linked to global discourses around radical Islam and the war on terror. These global dynamics around radicalization and CVE, with FoRB seen as a key strategy in CVE (as noted above), contribute to reinforcing perceptions of FoRB as bound up with Western exercises of power. Many local communities are thus skeptical of the language of FoRB. To overcome such skepticism, local partners utilize alternative concepts and narratives that relate more to tolerance, diversity and difference in general, rather than religion explicitly. This is not to say that religion is not important, but it is not the only or primary point of difference or tension in the communities. As a staff member in Cirebon pointed out, there is a 'lack of sensitivity to the needs of people. Religion is often being used to cover up, for example, economic and social issues.' Hence, local partners are careful to address other sources of tension and difference that are bound up with religion. Rather than insisting on the language of FoRB, their initiatives aim at the promotion of tolerance and to engage with the stated needs of people.

In Gujarat, local partners did not 'use religion directly' in their communication with members of the local community. Program facilitators and NGO employees of the Alliance for Peace and Justice (APJ), a local network of MM's partner organizations, preferred to ask about 'local issues'—problems regarding corrupt government officials and the subsequent lack of schools, roads, sanitation, and employment in specific 'areas'. This is partly due to fears of biased state actors skeptical of NGO work related to religion and especially religious minorities. Yet it is also connected to the view of local organizations and community members that the root cause of conflicts is not religion but rather the absence of specific infrastructure and services. People have been deprived of these because of their religious belonging and identity, not necessarily their religious 'beliefs'. This suggests that what is being violated is not the right to FoRB *per se* but rather the right to freedom from discrimination, as expressed under Article 2 of the UDHR. Religious identity is not considered specifically different from other forms of identity like caste or tribe. Belief is not the operative word, for the participants or the staff members, even when discussion revolves around religious communities. Religion is a taken-for-granted community identity. Communities and not individuals are the focal group. The program replicates the language of the Indian constitution, using terms that simultaneously denote community identity and deprivation – religious minorities (Muslims and Christians), Scheduled Castes, Other

Backward Castes and Scheduled Tribes (which is also not without its problems). The work regarding FoRB is not directly concerned with individual freedom of religion or belief, but neither is it about collective freedom to believe or practice religion. Religion as a category is a social marker to identify disadvantaged communities. It could be replaced with other markers of social identities, as it has been with 'tribal'. Religion is invoked not concerning belief but as a site of discriminated identity. This raises the question about whether FoRB is the most effective framework to be engaging in rights education, advocacy and promotion in this context, or whether other rights such as Freedom of Expression, Freedom of Assembly, or even alternative language such as Freedom of Conscience, might be more appropriate.

Very rarely, participants spoke about differences in belief systems or opinions as a reason for conflicts between religious communities. Difference in practices was mentioned several times but the most common reasons stated for religious conflict were 'political manipulation' and greed. Addressing conflict and tension by focusing specifically on religious differences may not address the key causes of existing tensions, and raises the possibility that such efforts may reinforce or exacerbate identity differences between groups and thus the grounds on which discrimination and inequality exist. This means that any efforts to address concerns around FoRB, diversity, tolerance and pluralism must take into account a broader range of concerns, including economic inequality, strengthening governance, and citizenship advocacy and participation.

Local language, wisdom and practices as alternative frameworks

Especially in Cirebon, but also in Gujarat, utilizing local language, wisdom and practices as part of the projects at the grassroots was a crucial element in their success.

The program run by local partner organization Fahmina, called Setaman, or 'School for Love and Peace', focuses on diversity and tolerance, promoting a narrative in which the Indonesian state ideology of Pancasila and the national slogan of Unity in Diversity are the dominant frame of reference. Diversity and tolerance are part of national Indonesian identity, taught in programs during primary and secondary school. 'Diversity' and 'tolerance' are the frames of choice because of the problematic connotations that may be associated with other words such as 'freedom' and 'pluralism', noted above. Tolerance is understood as a category of active behavior, often included into considerations about the Indonesian state and that national welfare is dependent on 'togetherness' and 'strength in unity.'

The differences across which 'togetherness' is to be strengthened are manifold, including religion but also ethnicities, languages, and opinions. In Cirebon, ethnic differences mainly include Javanese and Sundanese people. Religious differences include different Islamic traditions (Sunni, Shia, Ahmadiyya), Christian traditions, Buddhism, Hinduism, Confucianism, and indigenous and tribal religions. Consequently, Fahmina addresses both inter- and intra-religious differences.

The significance of intra-religious differences is at times overlooked in international policy discussions on religion and diplomacy in general, and the right to FoRB in particular. Yet intra-religious conflict can be more problematic and disruptive than inter-religious conflict. Conflicts in Cirebon, for example, are more likely to revolve around differences in intrafaith dynamics than between different religions. Although some more radical groups also act against Christian communities, the most significant tensions occur between Sunni, Shia, and Ahmadi Muslims. Political and legal discrimination rests on tensions fuelled by radical groups, creating an atmosphere in which the acceptance of smaller Islamic communities as part of Islam becomes a political dispute. Underlying these conflicts, as a local activist put it, are disputes around 'the image of Islam', which has become increasingly polarized and influential over the past decade, mainly through social media.

Local wisdom and practices provide ways of relating to others that are accepted across different traditions and offer possibilities for conflict prevention and transformation. These local perspectives supplement and in some cases transcend global human rights discourses. For example, 'human rights' is viewed as a highly complicated and often problematic concept and discourse within local Indonesian contexts and communities. Interlocutors spoke instead of the importance of focusing on behaviours and practices rather than spending too much time and energy on defining, explaining, and educating on 'human rights' as such, utilizing local practices and approaches. These can help to cultivate mutual understanding in times of growing alienation and negative imagery in the media. (For more specific examples, see appendix 1). We suggest these insights are not only important for local actors operating at the grassroots in Indonesia or India, but also for actors operating in a variety of cross-cultural contexts. 'FoRB' may not be the most effective terminology, but there may be other terms, more fitting with the specific context, that convey similar ideas and values. Consideration should be given to utilizing these alternative terms.

The centrality of relationships and direct encounters

In both Cirebon and Gujarat, staff at MM's partner organizations emphasized the need for people to meet and build relationships with one another in safe settings. In Cirebon, Fahmina follows a strategy in which people from different backgrounds are brought together so that they can 'hang out' and get to know each other, often in different houses of worship. Hanging out with each other in a relaxed environment is more effective than having discussions about religion according to some of the program facilitators. In Gujarat, APJ employ a similar strategy, whereby people from different religious communities are brought together to work collaboratively on a shared project, one that is not focused on religion. Rather, their projects center on shared concerns, including adequate access to food, water, sanitation, healthcare, and education. The underlying strategy is that differences between religious communities will be addressed more effectively by not focusing explicitly on religion, which can emphasize and reinforce differences and thus potentially exacerbate tensions. Local staff saw no need to talk specifically about encouraging diversity or plurality since intolerance towards diversity or plurality is not in their view the root of the problems. The focus is to make people aware of 'discrimination' towards minority communities, which can occur on the basis of multiple identity markers, not only religion. Encouraging people to respect other religions or communities does not, in APJ's view, require any argument apart from drawing attention to the other's discomfort. Making people 'sensitive' is making people pay attention to problems and wrongs around them and work towards addressing these, instead of ignoring them and going on with their own lives. Accordingly, making people sensitive towards religious freedom is making people aware of discrimination based on religion. Many local respondents said the problem was not about religion but people with power favouring 'their own people'. When asked what 'own people' meant, many respondents said that it means the people they generally know and 'have relations with', not necessarily distinguished along religious or community lines. The idea of 'relations' comes up many times in different contexts. In some way, APJ is also trying to 'make relations' with different stakeholders. This idea of 'relations' is a sort of loose personal connection based on 'uthna-baithna' (literally – getting up-sitting down) or hanging out.

The research conducted for this project is limited in a number of ways. It focused on two culturally, politically, ethnically, and economically distinct contexts. Within those environments, we looked only at specific projects run by small local community partner organizations. As such, the insights gained are limited to the specific people, places, and projects involved. Nonetheless, it is interesting that similar themes and approaches emerged in both sites, though applied in contextually sensitive and unique ways. This finding provides support for insights from other scholars writing on FoRB and human rights more generally, suggesting that while the language of human rights as expressed in the Universal Declaration of Human Rights is not universal, the values themselves nonetheless resonate with principles that exist across a diverse range of philosophical, cultural, religious and political traditions and contexts (e.g. An'Naim 2000; Wilson 2010; Chan 2011; Adami 2012; Arifin 2012). The emergence of common themes suggests that there may be broader lessons that can be drawn, not only for work on the right to FoRB in foreign policy or international civil society, but also for work on human rights more generally and in domestic politics and civil society in Western contexts. At the same time, it is important to remember that 'human rights', 'freedom of religion or belief', 'freedom', 'religion' and specific religious traditions are not static. They are constantly interpreted and reinterpreted. These processes of interpretation and reinterpretation are affected by context (Schonthal 2015) and contribute to the emergence of differences and tensions in how FoRB and human rights are expressed, implemented and resisted. This further reinforces the need to take a broad range of factors into account in any work on FoRB.

Conclusions and Recommendations

There are a number of lessons to be drawn from the Cirebon and Gujarat cases presented here that can contribute to the development of more collaborative, more sensitive and, we suggest, more effective cross-cultural engagement on the right to FoRB and on human rights issues more generally. We outline some of these below, stressing that this is by no means an exhaustive list.

1. Recognize that understandings of 'religion' are fluid, incorporating communal identity as well as personal belief.

2. Religion cannot be focused on in isolation, but should be considered as part of broader socio-political, economic, and cultural power dynamics. In some cases, it is not the right to FoRB that is violated, but discrimination and the deprivation of other rights on the basis of religious identity. As such, FoRB may not always be the most appropriate framework.

3. Give equal attention to both intra-religious and inter-religious relationships. Often limitations on the right to FoRB can be violated more in intra-religious relationships.

4. Be aware of the impact of global political debates on local community dynamics.

5. Adopt wisdom and insight from cross-cultural settings in policy language and development.

6. Adopt the language and attitude of partnership, collaboration, and mutual learning. North Atlantic policymakers and activists should support local communities, not speak in their name.

7. Consider incorporating attention to FoRB into a wider range of activities related to human rights.

8. Direct encounters with others and strong personal and community relationships are crucial ways to build cohesive, welcoming, and inclusive communities across social, political, cultural, religious, and economic divides.

Appendix 1: Examples of local language use

Two examples of local wisdom and practices encountered during the research are Silaturahmi and Ngaji Rasa. Deeply embedded in everyday life, these concepts involve both the self and the other. Silaturahmi encompasses practices of direct encounter, literally meaning 'gathering', which takes place in private places that (normally) provide space for meetings designed to establish and maintain good relations with and knowledge about friends, family, and neighbors. Fahmina experienced a number of instances showing that Silaturahmi can be an effective means to overcome social, religious, and political divides. It involves duties for both guests and hosts and is an essential part of Indonesian everyday life. In contrast, Ngaji Rasa is less obvious than Silaturahmi and also less well known. Nonetheless, it is a valuable element of local wisdom, which emphasizes empathy and self-reflexivity. Interlocutors described it as 'walking in someone else's shoes' or 'I am you, you are me;' learning about and understanding others' and one's own conditions of life, feelings, and thoughts, which demands sensitivity towards others, to one's own experiences, and the environment.

In Gujarat, NGO staff officially used the language of assertion of rights. However, in discussions with several Muslim participants, as well as in informal discussions with the staff, the idea recurred that assertion of rights is not the solution to the problems in Gujarat as it misunderstands the source of conflict. Instead, many Muslims said that is the duty of the Muslim to not respond to discrimination with hostility, but try to show "Akhlaq", a sort of unbounded love. Ways in which 'akhlaq' and the assertion of rights may complement one another is an area that still needs to be developed and researched further.

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