RELIGION, PLURALISM AND THE SECULAR STATE: STRIVING FOR A POST-SECULAR MIDDLING

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Abstract
The revival of theological thought in political discourse has lent rise to criticisms of secularism, which allege an antiseptical and distorted evaluation of the place of religion in the public square. Such critics often propose a return to a Tocqueville-esque state of secularism contained within the greater Christian sphere. Connolly asserts that the intersections between religion and the secular state need not be so dichotomous and zero-sum. However, some religionists and secularists do approach this ‘culture war’ with a mutually exclusive zero-sum mindset.

The basis of rights-based liberal societies in the Global North is individual spiritual autonomy. As described by Diana Eck, pluralism is the engagement that creates a common (liberal) society from plurality. John Rees presents a theistic-secular middling on claims to legitimacy and the national ‘centre’, where religious institutions are subordinated by certain state (and interstate) norms inherent in the social contract (i.e. basic human rights necessary for the function of a liberal democracy), while providing for the free exercise (i.e. negative right) and freedom from state intervention of the manifestation of religious customs and identities.

In light of the recent Australian controversies, tensions and conflation of Islamic identities with the emergence and security response to the Islamic State (IS), this paper seeks to engage discourses of liberal secularism, pluralism, and postsecular logics. Throughout the paper, the story of a mentally ill individual is recounted to demonstrate instances of state-perpetuated suppression of personhood. Responding to and using Connolly and Rees’ postsecular and liberal pluralistic narratives, this paper examines marriage equality and the state of LGBTQ equality in the United States, Canada, and Australia.

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Introduction: Religion and Pluralism

"To see the other side, to defend another people, not despite your tradition but because of it, is the heart of pluralism." - Eboo Patel

The revival of theological thought in political discourse has lent rise to criticisms of secularism, which allege an antiseptical and distorted evaluation of the place of religion in the public square. Ludwig uses the example of fictional characters who “take up secular challenges” by rearticulating faith and reconsidering religion as a “turn.” John McClure first dubbed this “turn to the religious” in 1995, as the postsecular. Lambropoulos describes the postsecular project as a response to Protestant critique of church institutions, by attempting to seek an alternative legitimacy for Christianity, whereby systematic and interpretative understanding is fundamentally discouraged in favour of faith that embraces dogma. Critics of secularism contend that its foundation within liberal societies is unrepresentative of the “sources of morality most citizens endorse.” Such criticisms often propose a return to a Tocqueville-esque state of secularism contained within the greater Christian sphere, as opposed to the perceived state of the containment of Christianity within the secular public square. Connolly asserts that the intersections between religion and the secular state need not be so dichotomous and zero-sum. However, some religionists and secularists do approach this ‘culture war’ with a mutually exclusive zero-sum mindset. This can be seen in the activities of far-right groups in Europe, where the ‘religious other’ (i.e. described in Britain as ‘Asian’ or ‘Muslim’) are presented as an existential threat to the very survival of the nation. Such groups often invoke the ‘European identity’ and its Judeo-Christian cultural origins as justifications for simultaneously delegitimating certain minority religions with the greater European identity, and imposing a religious (i.e. Christian) set of values as centrally characteristic to such identity. Connolly asserts that this ‘culture war’ indicates a battle for the national ‘centre’ and the definition of its identity. His critique of secularism points to the purported uniform delegitimation of overtly religious identities, as inherently incompatible with liberal democracies.

Within liberal democracies, freedom is understood to encapsulate the doctrines of free speech, objectivity and academic freedom, associated with the principles of liberal pluralism. Pluralistic liberalism assigns great importance to individual liberty, despite conflicting and often antagonistic values or systems of values (i.e. cultures). Liberal pluralism finds its basis in universal rights, such as those espoused in the Universal Declaration of Human Rights (UDHR) and the over 80 international treaties, covenants and declarations it has inspired. It is not the prizing of “cultural pluralism as a beautiful or sublime manifestation of human creativity, whatever the cost to decency and basic rights.” As described by Diana Eck, the difference between diversity and pluralism is in its passiveness and proactiveness. “Diversity is just plurality, plain and simple—splendid, colorful, perhaps threatening. Pluralism is the engagement that creates a common society from all that plurality.” As such, the advancement of liberal principles in a pluralistic fashion is not exercised through logics of subordination or domination, but rather negotiation. “Diversity does not necessarily imply that agreement of values is impossible.” Secular ethics have come to be associated with ‘postmetaphysical’ (or non-metaphysical) conceptions of morality such as Rawl’s ‘veil of ignorance’. Although certain religionists argue that atheism equates to amorality, the philosophies of Rawls, Marx, Keynes, John Stuart Mill, Chomsky, and Hitchens proves otherwise. Connolly retorts that the abstention from ‘metaphysical’ (i.e. Christian) sources of morality renders it challenging for those who identify with such constructs to meaningfully engage in political discourse. He opines that certain issues require a universal set of ‘public virtues’, citing the ‘legitimate’ variety of sexual orientations, the ‘organisation’ of gender, the question of euthanasia, and the ‘practice’ of abortion as examples. Rees, however, describes a theistic-secular middling on claims to legitimacy and the national ‘centre’, where religious institutions are subordinated by certain state (and interstate) norms inherent in the social contract (i.e. basic human rights necessary for the function of a liberal democracy), while providing for the free exercise (i.e. negative right) and freedom from state intervention of the manifestation of religious customs and identities. Pluralism, from the Reesian post-secular perspective, aims to include the ‘religious other’ by engaging such minority
Freedom to and from religion

Archibishop Dennis Hart seems to agree with Connolly's observations of the moral authoritarianism of the 'transcendental'.

In late 2011, Two Lower House MPs; Labor's Stephen Jones and the Green's Adam Bandt, put forward amendments to the heterosexist Marriage Act to bring about marriage equality in Australia. A parliamentary inquiry was opened to the public and 65,000 Australians responded with 54% in favour of specific changes to the marriage act, which would not affect or otherwise impose on the marriage customs of religions and religious institutions. On 30 May 2012, Archbishop Dennis Hart and five other Catholic bishops in Victoria sent out 80,000 copies of a letter titled, Pastoral Letter on the True Meaning of Marriage from the Catholic Bishops of Victoria. Hart invoked the stance of the Catholic Church on the “wonderful fact of sexual difference and its potential for new life” and warned his readers to “pray about the ramifications for current and future generations”, asserting that the legislation of civil (i.e. state, non-religious) marriage equality would allegedly result in “no human beings and no future.”

Senator Birmingham and Boyce demarcate three distinct roles that all marriages can play; i) a public declaration and celebration of love between two people; ii) a commitment made before God or in accordance with religious beliefs; and iii) a legal agreement entered into in accordance with the laws of Australia.

The first of these roles involves a decision that is intensely personal and maintains the likeness of a private contract between two people. The second of these is also a personal matter between the two people getting married and their church or religious institution. In a free and secular society like Australia, the role this second factor plays should be respected and protected by our laws, but not dictate how our laws are shaped.

Archbishop Hart may have been, for a short moment in time, the loudest voice in attempting to demarcate and define the national centre in his religiously doctrinal terms, however, his views are not replicated by and opposed to by those who share Christian beliefs and other religious communities.

Reverend Greg Smith stated that the Metropolitan Community Church is “committed to supporting and working for marriage equality for all people around the world and especially here in Australia whether they are in opposite or same sex relationships.” Quakers in Australia agree, “to treat all requests for marriages within our meetings in accordance with Friends' usages, regardless of the sexual orientation or gender of the individuals involved.”

The Union for Progressive Judaism “in accordance with the values of equality and egalitarianism...believe that the GLBT community should be afforded full rights, equal to all other peoples.”

Western Australian Lutheran pastor Neil Hart asserted that, “It is unjust that same-sex couples cannot receive the same social acceptance and broad community celebration and support of their relationship that is only afforded in our society by the institution of marriage.”

Abbot of the Santi Forest Monastery Australia, Ajahn Sujato wrote, “Supporting marriage equality is not to introduce something new, but simply to abolish laws that discriminate. The injustice is already in place. The harm is being done. The change is merely to remove the harmful influence of discriminatory laws, which should never have been there in the first place.”

Connolly criticizes the secular public square for its ‘ethical fragility’ given the fickleness of democratic electorates. “Attitudes about homosexuality have been fairly stable in recent years, except in South Korea, the United States and Canada, where the percentage saying homosexuality should be accepted by society has grown by at least ten percentage points since 2007.” Most significant change can be seen in the United States where acceptance of homosexuality has increased from 49% in 2007 to 60% in 2013. Pew Center Research surveyed the continuum of Christian and other religious institutional positions on gay marriage. Religious positions ranged from allowing same-sex couples to marry within Reform and Conservative Jewish movements, the Unitarian Universalist
individuals, and most fundamentally, the freedom, equality in dignity and rights of humans. While the premise for the application of human rights, while admittedly rooted in certain Eurocentric customs, simultaneously applying a rigidly Eurocentric and Judeo-Christian religious beliefs.

Connolly expresses logics of ethics on the basis of human suffering. Acknowledging that secularism recognises suffering and the ethical necessity to respond to it, Connolly applies John Caputo’s construct of ‘suffering at the centre of moral attention’. Caputo attempts to discard abstractions of contemporary ethical theory by focusing on the obligation to respond to human suffering; “not commanded on high, nor is it grounded in reason, nor does it filter into life through mystical experience.” Connolly describes Caputo, a theologian and philosopher, as approaching ethics in a pragmatic manner. “Moral codes grounded in a law of laws, such as the commands of god or the dictates of a categorical imperative; are too blunt, crude, and closed to respond to suffering equitably.” Submissions from religious, human rights, and health bodies to the Senate Legal and Constitutional Affairs Committee indicated that legislating marriage equality would have the affect of improving Australia’s health and wellbeing in addition to bringing equality to all Australians, without affecting the religious marriage practices. The Australian Human Rights Commission (AHRC) is in agreement with the Yogyakarta Principles affirming that human rights laws apply to LGBTI individuals. Their support for civil marriage equality is based on the principle of equality and health outcomes. The Australian Research in Sex, Health, and Society at LaTrobe University published a 2006 report highlighting the impacts of discrimination on the LGBTI community – “67.3% of participants indicated that fear of prejudice or discrimination caused them at least sometimes to modify their daily activities.” In December 2011, Australia’s counterpart to the American Psychological Association (APA), the Australian Psychological Society (APS), announced their unanimous endorsement of the APA Resolution on Marriage Equality for Same-Sex Couples. They cite the “mental health benefits of marriage, and the harm cause by social exclusion and discrimination arising from not having the choice to marry,” as key considerations for their support. “Research indicates that discrimination, social exclusion and homophobia experienced by Australians on the basis of their sexual orientation, sex and/or gender identity contributes to negative health outcomes. Removing legislative discrimination…promote[s] better health outcomes.” The scientific evidence is in – there is no medical justification for continuing to perpetuate centuries of state-sanctioned discrimination and bigotry towards the LGBTQ community.

A cursory glance at the authors of the Yogyakarta Principles in its Application of International Human Rights Law in relation to Sexual Orientation and Gender Identity, presents a diversity of prolific and distinguished legal scholars from countries with very different ethnocultural and religious (and non-religious) beliefs. Connolly expresses with great vehemence that morality (including the rationale for human rights) must originate from ‘supersensitive’, ‘metaphysical’, or ‘transcendental’ origins; simultaneously applying a rigidly Eurocentric and Judeo-Christian interpretations universal HRL regimes and discourses of legitimacy within democratic polities. As expressed by Ignatieff, the premise for the application of human rights, while admittedly rooted in certain Eurocentric customs, has emerged to become “universal standards” for the freedom, equality in dignity and rights of individuals, and most fundamentally, the exercise and achievement of human agency, irrespective of...
Article 18 of the International Covenant on Civil and Political Rights (ICCPR) states that, “Everyone shall have the right to freedom of thought, conscience and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private, to manifest his religion or belief in worship, observance, practice and teaching.” This is reaffirmed in Australian jurisprudence via s116 of the constitution, which contains the ‘free-exercise’ clause. Mortensen demarcates s116 of the Australian Constitution into three distinct clauses.75 The most relevant clause pertaining to the free practice of religious beliefs is the ‘Free Exercise Clause’. Tonti-Filippini purports that the constitutional protections and limitations on the state’s ability to legislate against the free exercise of religion are restricted to the Federal level.76 I would not dispute this interpretation. The Marriage Act 1961 (Cth) happens to be a Commonwealth Act – an Act that supersedes State parliamentary legislation. By virtue of s109 of the Australian Constitution, federal legislation trumps state legislation in the event of any conflict between Federal and State laws. Therefore, the Marriage Act 1961 (Cth) and by extension, all the rights and benefits associated with marriage, can only be amended by the Federal parliament, which is in turn bound by s116 of the Australian Constitution.

“The Commonwealth shall not make any law for establishing any religion [Establishment Clause], or for imposing any religious observance [Observance Clause], or for prohibiting the free exercise of any religion [Free Exercise Clause] and no religious test shall be required as a qualification for any office or public trust under the Commonwealth.”

- Commonwealth of Australia Constitution Act 1900 (Cth) s 116

The oft-cited rhetoric of governmental infringement on the freedom to manifest religious belief in religious institutions is at its best unfounded and at its worst a source of division and fear.78 Exemptions to existing federal and state level anti-discrimination acts provide ample protection for religious expression – put simply, faith-based communities are free to discriminate to their hearts’ delight.79 Slucki concedes that, “various exceptions or exemptions to the application of anti-discrimination rules,” leave ample “room for the exercise of religious freedom.”80 On the matter of exemptions, Mortensen highlights the alarming inequality and Christian privilege stemming “from the predominance of the inherited Christian institutions”.81 Parkinson opines that religious freedom “includes the right to form religious organizations and to operate these according to religious values."82 He contends that these faith-based organizations, such as “schools, hospitals and welfare organizations, as well as places of worship” already exist.83 Intense debate surrounds the definition of religious bodies – this debate is not the focus of this article. Tonti-Filippini argues that the tenets of the ‘Religion Clauses’ in the Australian Constitution “limit the role of the State”.84 Places of worship, such as churches, mosques, synagogues and temples, are unequivocally considered well within the private religious domain. By extension, religious marriages, which are administered by religious ministers, are by definition, no business of the state. The Canadian Religious Coalition for Marriage Rights reaffirms the religious freedoms guaranteed under the Canadian Charter of Rights and Freedoms and “unequivocally support the right of those faiths with contrary views to continue to refuse to perform same-sex marriages.”85 In the United States, lively debate among the ‘four mainline Protestant groups’ have encouraged various interpretations and reaffirmed the freedom of...
conscience, for individual congregations and even individual ministers to choose whether to bless same-sex civil unions or marriages. Dean of Brisbane’s St John’s Anglican Cathedral, the Very Rev Dr. Peter Catt, commended that the proposed amendments in the Australian Parliament to civil marriage “will not affect the right of churches or other religious groups to celebrate marriage according to their own understanding and religious beliefs.”

Suppressing Personhood

Although states may have signed and ratified international human rights treaties such as the ICCPR, implementation and enforcement remains far from the ideal. The use of psychiatric diagnosis, treatment or detention for political purposes have been widespread throughout the world, frequently during periods where persons or regimes in power are criticised for corruption, political oppression, unlawful use of force, or the undermining of basic human rights. Political abuse of psychiatry has been evident in both the Global North and Global South. During the ‘McCarthy’ era in the United States, many alleged ‘communist sympathisers’, ‘leftists’, and ‘socialists’ were detained in psychiatric institutions, despite any evidence of pathology besides political belief. As an example, Australia’s submission of reservations to the UN Conventions on the Rights of Persons with Disabilities (CRPD) has received criticism from civil society and the UN CRPD Committee on the implementation of the convention. Pursuant to Article 13 (Access to Justice) and Article 14 (Liberty and Security of the Person), issues have been highlighted with concerns as to the forced, involuntary, and solitary confinement of persons with psychosocial disabilities.

Take the case of Ed (name has been redacted as per individual’s wish). Since an incident during his studies in 1999, he has been diagnosed with various psychiatric disorders on the psychotic spectrum and is now currently suffering from schizoaffective disorder. Ed understands that this is the current label he has been given. Ed subscribes to a spiritual belief which he acknowledges, to this date, that no-one else has stated ascription to. He believes he is a prophet of his own unique religion, and has vocally asserted such beliefs, although not in any physically violent or criminal manner. Ed sold his car and travelled to China in July 2014, where he believed he would be granted and reported that he sought political asylum. Irrespective of how unseemly or strange Ed’s belief may be, seeking political asylum is a declared right under Article 14 of the Universal Declaration of Human Rights (UDHR). Ed has openly opposed the medical establishment, his treatment by the State, and what he self-describes as ‘fascist capitalistic regimes’. He has expressed these views vehemently to his medical treatment team including hospital personnel, doctors, psychiatrists, nurses, psychologists, and community counsellors. The Australian High Court, despite any explicit Australian ‘Bill of Rights’, has routinely affirmed the constitutional right to freedom of ‘political communication’. Ed is cognisant that his political and religious beliefs are viewed in both a medical and lay-sense as atypical, unorthodox, and non-normative.

As of August 2014, the quasi-judicial bodies of the NSW MHRT and NCAT conducted a hearing in Ed’s absentia. They established that due to severity of his mental illness, he can no longer exercise rational legal consent as an individual, and thus been placed under the oversight of the NSW Public Guardian. Referring to Article 13 of the CRPD and the principle right to access justice, Ed has been stripped of his right to appoint advocates, carers, or legal counsel. Furthermore, Ed can no longer object to medical procedures, or even unapproved clinical test trials, as his legal agency has been removed and substituted by the NSW Public Guardian. In accordance with Article 14 (CRPD) and s68 (least restrictive method) of the MHA 2007 (NSW), Ed has demonstrated no history of physical harm to self or others and has no criminal record to speak of. This example demonstrates an instance where the state has exercised power without the consent of the Governed, and furthermore violated the social contract by undermining Ed’s agency, without any justifications for the greater good of society.

“My mind, body, and soul has been continually violated by the Australian government.” – Ed, 7 October 2014
Ed rejects his Caucasian ethnicity, claiming to be of Chinese descent. This can be seen, akin to the cultural alienation felt by certain immigrant groups in Europe and here in Australia (although with far greater psychopathology), as a response to the otherisation felt by and imposed on Ed. Young second and third generation Europeans of Muslim faith have been ostracised to the extent, where they no longer feel an association to European culture or identity. Their religious identity is often portrayed as dichotomous, in opposition to, and illegitimate within the liberal secular ‘public square’. As described by Edward Said, he himself felt confusion in his emerging identity as a Palestinian American; having to confront the perceived illegitimacy of being Muslim and opposing U.S. policy on Palestine as an American. Similarly in China, members of Falun Gong are persecuted through state instruments, including the medicalization of political dissent (classified as paranoid psychosis). The ongoing negotiations between the Vatican and the PRC government epitomise the challenges of reconciling Catholic faith with Chinese identity. Chinese Catholics who want to practice under the religious leadership originating from the Vatican are delegitimized as threats to state, while Catholics who conform to the PRC’s appointment and control of ‘official’ Catholic practice retain both their (disgenuous) Catholic and Chinese identity. During the reign of the Nazi regime in Germany, the state invoked its ‘duty’ to prioritise care and used psychiatric justifications to sterilise 300,000 and kill 100,000 individuals. Dissenters of the Soviet regime were diagnosed with ‘sluggish schizophrenia’ and ‘paranoid psychosis’, on the assumption that one would have to be ‘insane’ to oppose the ‘perfect’ regime of Marxist-Leninism. It would appear that Ed’s beliefs in the metaphysical, his civil disobedience, his political dissent, and personal self-identification with other cultures or religions (i.e. Chinese Bhuddism) or ideologies (i.e. radical Marxism) exclude him from exercising his rights as a legitimate agent in Australia.

This bears uneasy resemblance to the socio-political oppression that members of the LGBTQI community have and continue to suffer. Since the emergence of the Diagnostic and Statistical Manual of Mental Disorders (DSM)-I, homosexuality was psycho-pathologised along with many other consensual sexual and gender orientations. It was not until a concerted effort by the pride movement and queer community that psychiatry accepted homosexuality as an acceptable ‘deviation’ in the 1970s, and it was not until the publication DSM-IV in 1994 when homosexuality was removed as a mental disorder and formally considered ‘normal’. To this day, religiously themed ‘conversion’ clinics claim to be able to ‘pray the gay away’. Notwithstanding the severe psycho-emotional trauma, these conversion clinics lack medical legitimacy (and regulation) and co-opt religious freedom as a source of their purported scientifically proven methods. Ample evidence has demonstrated that societal prejudices are the source of significant medical, psychological, and overall harm to those in the LGBTQI community. Highly rejected LGBT youth were more 8 times more likely to commit suicide, almost 6 times as likely to report high levels of depression, and more than 3 times to turn to addictive substances. Gay conversion therapy is not only a barrier to social acceptance but significantly deleterious to the health of these youth. In July of 2013, Alan Chambers, president of Exodus International, the United States’ largest conversion organisations apologised to the LGBT community stating that, “99.9 percent of people I met through Exodus’ ministries had not experienced a change in orientation.” In light of the medical evidence against conversion therapy and the tragic loss of life, American legislators and the Christian community have teamed up to outlaw this dangerous practice. Illinois’ Republican governor signed a bill in August of this year banning mental health therapists from trying to change a person’s sexual orientation or gender identity. Similarly, U.S. President Barack Obama called for an end to LGBT conversion therapy – and surprisingly states’ legislators are following suit. In Canada and Australia, the conversation is starting to take place. In June 2015, Ontario became the first Canadian province to ban conversion therapy in June for LGBTQ children. Changes in Australia have taken longer to occur and legislators have yet to table a bill to ban conversion therapy, although the issue is on the national agenda.
Much like the unwilling youth subjected to conversion therapy, Ed’s involuntary treatment by the state has resulted in a level of mistrust of authorities. His diagnosis, involuntary treatment, restraint, seclusion, and hospitalisation have only reinforced Ed’s mistrust, and after over a decade of forced medical treatment, have not resulted in any notable improvement of his condition. Ed’s exercise of the fundamental freedoms of speech, conscience, travel, religion, beliefs; and the various civil and political liberties that underpin a free and democratic society, are being used by the State as *prima facie* evidence of the severity of his medical illness, and justifications for placing him under guardianship and rendering him ‘legally incompetent’.

Only two decades ago, homosexuals were persecuted in a similar manner. Such treatment is reminiscent of the PRC’s pathologisation of political dissent, as seen in cases of psychiatric diagnoses of Falun Gong practitioners. Described by Haywood, Kravitz and Grossman as the ‘revolving door’, the more insistent that Ed becomes on the exercise of these rights, with particular regard to political expression, beliefs, and religion, the more ‘evidence’ his medical team, the MHRT and NCAT have to demonstrate his medical illness and justify the deprivation of his liberty. Simply by virtue of his otherised status as a mentally ill individual, expressions of grievances, legitimate or otherwise, are considered uniformly pathological and a sign of his severe symptomology. Only when Ed conforms to the expectations and statements of the State, are his statements then taken as rational and legally representative.

**Conclusion**

State non-interference in beliefs and the freedom to manifest them (without damaging the rights of others) has been a defining characteristic of the ‘liberal’ in liberal democracies. Ed’s example does present a case of religious beliefs being super-subordinated by (secular) State jurisdiction, to the point of persecution, and arguably cruel and unusual punishment. As with the conflict of identities between European youths of Muslim identity, Ed has reached a point of total alienation and rejection of his Australian identity, seeking refuge in radical Marxist and metaphysical identities to cope with the trauma of long-term and systemic abuse. This can be seen as an extreme example of Connolly’s critique of secularism as delegitimising and alienating certain religious elements and identities from the national ‘centre’. Such discourse has been explored via the ‘root cause’ theory in terrorism (with particular regard to radical Islam). Similarly postcolonial narratives have also provided criticisms of applying ‘imperialistic’ approaches to rights protection without the ‘diversity-sensitivity’ of liberal pluralism. As such, certain spheres of the ‘sacred’ such as religious practices on marriage have an inherent right to operate without state interference on the liberal secular basis of individual spiritual autonomy.

On the issue of *civil* same-sex marriage, the scientific and medical conclusions are definitive, whereby the state’s obligation to respond to Connolly’s description of suffering (of marginalised LGBTQ individuals) obligates marriage equality. In ensuring freedom to religion, the liberal state also protects the vulnerable from religion. Certain discriminatory views of religious institutions (i.e. Catholic leadership of Victoria) in its aggressive and morally authoritarian intrusion into a civil (state) matter, when the religion is in itself not subordinated by state or public norms, suggest a degree of illegitimate agency and demonstrates a need for continued separation of ‘church’ and state. In light of the recent controversies, tensions, and conflation between Australia’s foreign policy against ISIS and Australians of Muslim faith, the Reesian formulation of a liberally pluralistic society, which can accommodate and include simultaneous identities of religion and citizenship present a liberal democratic solution. The ultimate question remains; how does the secular liberal ‘centre’ move forward with Reesian pluralism? The answer is certainly beyond the scope of this paper, and will no doubt continue to challenge the Reeses and Connollys of the world.


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NOTES


5. Ibid.


8. Ibid. 24.

9. Ibid. 39.

10. As described by Connolly


15. Ibid. 73-87.


18. Ibid. 68.


20. Ibid.


23. Ibid. 67.

24. Ibid. 36-38.

25. Ibid. 37.


27. Ibid.


29. Restricting civil (state) marriage to mean “the union of a man and a woman to the exclusion of all others, voluntarily entered into for life,” Marriage Act 1961 (Cth)


33. Ibid.


35. Ibid.


44. Ibid.

45. Masci, "Where Christian Churches, Other Religions Stand on Gay Marriage."
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