

*ICLARS Series on Law and Religion*

# **CONSTITUTIONAL DEMOCRACY AND ISLAM**

**THE LEGAL STATUS OF MUSLIMS IN ITALY**

Francesco Alicino

ROUTLEDGE



# Constitutional Democracy and Islam

This book outlines the legal status of Muslims in Italy. In particular, it highlights that, when it comes to Islam, the Italian legal system exacerbates the dilemma of contemporary constitutional democracies, increasingly caught between the principle of equality and the right to have rights, which implies the respect of diversity. It provides readers with a deep understanding of how domestic and external socio-political factors may muddle the interpretation of Italy's constitutional provisions, starting with those relating to state secularism and religious freedom. It is argued that today, as never before, these provisions are torn between the principle of equality and the right to be different. This situation has been exacerbated by incessant states of emergency, from immigration to religion-inspired terrorism, in light of which the presence of Islam in the peninsula has been highly politicized. Italy's experience on the legal status of Muslims provides an interesting case study and, as such, a valuable source of empirical information for a functioning and pluralistic constitutional democracy, especially when dealing with conditions of fear and insecurity. The book will be of interest to researchers, academics, and policy-makers working in the areas of law and religion, constitutional law, comparative law, and human rights.

**Francesco Alicino** is Full Professor of Public Law and Religion at the University of LUM, Italy, where he also teaches constitutional law, law of the third sector, and immigration law.

## **ICLARS Series on Law and Religion**

Series Editors:

Silvio Ferrari

*University of Milan, Italy*

Russell Sandberg

*Cardiff University, UK*

Pieter Coertzen

*University of Stellenbosch, South Africa*

W. Cole Durham, Jr.,

*Brigham Young University, USA*

Tahir Mahmood

*Amity International University, India*

The *ICLARS Series on Law and Religion* is a new series designed to provide a forum for the rapidly expanding field of research in law and religion. The series is published in association with the International Consortium for Law and Religion Studies, an international network of scholars and experts of law and religion founded in 2007 with the aim of providing a place where information, data and opinions can easily be exchanged among members and made available to the broader scientific community. The series aims to become a primary source for students and scholars while presenting authors with a valuable means to reach a wide and growing readership.

### **Other titles in this series:**

#### **Law, State and Religion in Bosnia and Herzegovina**

*Nedim Begović and Emir Kovačević*

#### **The Church and Employment Law**

*A Comparative Analysis of The Legal Status of Clergy and Religious Workers*

*John Duddington*

#### **Business, Religion and the Law**

*Church and Business Autonomy in the Secular Economy*

*Matteo Corsalini*

#### **Constitutional Democracy and Islam**

*The Legal Status of Muslims in Italy*

*Francesco Alicino*

For more information about this series, please visit: [www.routledge.com/ICLARS-Series-on-Law-and-Religion/book-series/ICLARS](http://www.routledge.com/ICLARS-Series-on-Law-and-Religion/book-series/ICLARS)

# Constitutional Democracy and Islam

The Legal Status of Muslims in Italy

Francesco Alicino

First published 2023  
by Routledge  
4 Park Square, Milton Park, Abingdon, Oxon OX14 4RN  
and by Routledge  
605 Third Avenue, New York, NY 10158

*Routledge is an imprint of the Taylor & Francis Group, an informa  
business*

© 2023 Francesco Alicino

The right of Francesco Alicino to be identified as author of this  
work has been asserted in accordance with sections 77 and 78 of the  
Copyright, Designs and Patents Act 1988.

All rights reserved. No part of this book may be reprinted or  
reproduced or utilised in any form or by any electronic, mechanical,  
or other means, now known or hereafter invented, including  
photocopying and recording, or in any information storage or retrieval  
system, without permission in writing from the publishers.

*Trademark notice:* Product or corporate names may be trademarks  
or registered trademarks, and are used only for identification and  
explanation without intent to infringe.

*British Library Cataloguing-in-Publication Data*

A catalogue record for this book is available from the British Library

ISBN: 978-1-032-31354-2 (hbk)

ISBN: 978-1-032-31363-4 (pbk)

ISBN: 978-1-003-30939-0 (ebk)

DOI: 10.4324/9781003309390

Typeset in Galliard  
by Apex CoVantage, LLC

**To Giusy**



Taylor & Francis

Taylor & Francis Group

<http://taylorandfrancis.com>

# Contents

|   |    |
|---|----|
| <i>Acknowledgments</i>                                    | ix |
| <b>Introduction</b>                                       | 1  |
| <b>1 Religious Matrices of Constitutional Democracies</b> | 7  |
| <i>Introduction</i>                                       | 7  |
| <i>Vicarius Dei</i>                                       | 8  |
| <i>The Janus-Faced</i>                                    | 13 |
| <i>Secularizing Imago Dei</i>                             | 16 |
| <i>Secularizing the Law</i>                               | 23 |
| <i>From Tolerance to Freedom</i>                          | 26 |
| <i>And Islam?</i>   | 31 |
| <i>Theological and Secular Transformations</i>            | 36 |
| <i>The Emergence of the Muslim Question</i>               | 41 |
| <i>Towards the Religionization of Nation-States</i>       | 47 |
| <b>2 Majority and Minority Religions in Italy</b>         | 49 |
| <i>Introduction</i>                                       | 49 |
| <i>Historical and Political Backgrounds</i>               | 50 |
| <i>Belief, Behaviour, and Belonging in Italy</i>          | 56 |
| <i>The Hallmarks of Cultural-Religious Disputes</i>       | 58 |
| <i>The Majority and Minorities</i>                        | 66 |
| <i>Bilateralism Method</i>                                | 71 |
| <i>Bilateral Legislations for Minorities</i>              | 77 |
| <i>The Supreme Principle</i>                              | 83 |
| <i>Secularism Under the Other Paradigm</i>                | 86 |
| <i>Secularism and Neo-Pluralism</i>                       | 87 |



|          |  |            |
|----------|--|------------|
| <b>3</b> | <b>Sharia, Islam, and Muslims in the Peninsula</b>         | <b>92</b>  |
|          | <i>Introduction</i>  | 92         |
|          | <i>Islamic Sources of Law: A Relative Immutability</i>     | 93         |
|          | <i>A Living Book</i>                                       | 95         |
|          | <i>A Living Book in Constitutional Democracies</i>         | 97         |
|          | <i>Mutual Interference</i>                                 | 99         |
|          | <i>Muslims in Europe and the Three Bs</i>                  | 101        |
|          | <i>Islam in the Peninsula</i>                              | 105        |
|          | <i>The Italian Sword of Islam</i>                          | 107        |
|          | <i>The Islams</i>  | 111        |
|          | <i>The Pictures of Italian Islam</i>                       | 116        |
| <b>4</b> | <b>Constitutional Democracy and Islam in Italy</b>         | <b>121</b> |
|          | <i>Introduction</i>  | 121        |
|          | <i>Mapping Islam in Italy</i>                              | 124        |
|          | <i>Legal Forms of Islam in Italy</i>                       | 126        |
|          | <i>Places of Worship</i>                                   | 129        |
|          | <i>Burial Practices and Cemeteries</i>                     | 134        |
|          | <i>Financing Islam</i>                                     | 139        |
|          | <i>Italian Prisons and Islam</i>                           | 144        |
|          | <i>Symbols of Islam</i>                                    | 148        |
|          | <i>Education</i>   | 152        |
|          | <i>Muslim Workers</i>                                      | 153        |
| <b>5</b> | <b>Muslims in Italy and States of Emergency</b>            | <b>157</b> |
|          | <i>Introduction</i>  | 157        |
|          | <i>Accommodating Muslim Personal Law</i>                   | 159        |
|          | <i>Pragmatic Approaches</i>                                | 161        |
|          | <i>Administrative Bilateralism</i>                         | 165        |
|          | <i>Dante's Limbo and the Hell of Italian Bureaucracy</i>   | 168        |
|          | <i>Muslims as Unpredictable Realities</i>                  | 170        |
|          | <i>Violent Interpretations</i>                             | 173        |
|          | <i>Preventing Religion-Inspired Violent Radicalization</i> | 176        |
|          | <i>Security, Securitization, and Deradicalization</i>      | 179        |
|          | <i>Symbols of Constitutional Democracies</i>               | 182        |
|          | <b>Conclusion</b>  | <b>185</b> |
|          | <i>Index</i>   | <b>191</b> |

# Acknowledgments

I want to express my deepest thanks to all those who have been helpful with their comments and in giving me advice during the writing of this book. I also thank them for their constant support and long-standing friendship.



Taylor & Francis

Taylor & Francis Group

<http://taylorandfrancis.com>

# Introduction

The core of this book is the relation between constitutional democracy and Islam with a specific focus on the Italian legal system, under which all individuals have the right to have rights.<sup>1</sup>

When related to freedom of religion, this implies that everyone can freely profess, practise, and propagate the faith in various forms, alone or in community with others, in public or private, in worship, teaching, and observance. From this perspective, the pressing task of a constitutional democracy is to combine individual and collective rights, which also reflects in the paradoxical relationship between the principle of equality and the respect of diversity: the latter is a precondition for a reasonable application of the former, and vice versa, so much so that each exists thanks to its own (opposite) counterpart. In this way, everyone can develop and express a human personality<sup>2</sup> without unreasonable distinction on the grounds of religious or nonreligious belonging.<sup>3</sup>

This seeming contradiction arises from the nature of constitutional democracies.

Their structural versatility is legally embodied in the rule of law, the secularity of the state, and the protection of fundamental rights. If the principle of equality is expected to act in anti-authoritarian mode, it must have to do with the right of all to be different before and within the state law. The outright equality cannot be regarded as a given by superior powers. Rather, the democratic ideals of equality imply self-determination, which translates into a constitutional tool for the safeguard of one's own diversity against abuses of corporate, elitist, economic, political, cultural, and religious players. For that very reason, though, the degree and extent of diversities are subject to limitations necessary in a democratic society for the protection of public order, as well as the rights and freedoms of others.

1 S. Rodotà, *Il diritto di avere diritti* (Roma-Bari: Laterza, 2012) 10–87. For the origin of this concept see H. Arendt, “The Rights of Man: What Are They?” *Modern Review* (1949) Summer, 24–37; H. Arendt, *The Origins of Totalitarianism* (1951) (San Diego, New York and London: Harvest Book, 1968), especially the ninth chapter, “The Decline of the Nation-State and the End of the Rights of Man”, 207–304.

2 Article 2 of the Italian Constitution.

3 Article 3 of the Italian Constitution. See also Article 7, 8, 19 and 20 of the Italian Constitution.

## 2 Introduction

As outlined in what follows, all of this is a result of the long line of historical ideas of western constitutionalism.<sup>4</sup> It is, in particular, a result of a never-ending secular age,<sup>5</sup> during which the dynamic relation between equality and diversity has devised the concept of liberty with all its necessary *Unbehagen* (discontents).<sup>6</sup>

These discontents, indeed, perform as the basic, vital paradoxes of human rights: not everyone is in favour of them; it is certain, though, that they are indispensable for each constitutional democracy. It is not by chance that after the Second World War—that is, after the terrible hangover of the perfect, meretricious, megalomaniac ideal of national sovereignty—Western European countries were firmly established in legal systems based on rigid constitutions. That, on the other hand, underscored the importance of judicial review, whose function is particularly relevant when dealing with the protection of human rights, in the proper (meaning imperfect, human, fallible) sense of the term. In this vein, the right to have rights prevents democratic institutions from restricting fundamental freedoms without a justified constitutionally based reason: these institutions cannot unreasonably restrict constitutional freedoms in the name of, for instance, a Hobbesian obsession of national security or on the basis of Rousseau's unspecified general will, under which we are all obliged to be free.<sup>7</sup>

As a form of discontent, however, the human right of freedom of religion emerges from its practical problems, such as those referring to the legal status of Muslims and Islamic groups.

That is evident in the case of the current Italian constitutional democracy, where Islam has become—perhaps not accidentally—a source of legal concerns.<sup>8</sup> This is also because, under the pressing process of glocalization,<sup>9</sup> Italy is now experiencing a form of pluralism that is completely new to the peninsula. To be more precise, pluralism itself is not novel to the Italian geo-cultural context: various minorities have long been part of the national scene and often enjoyed a level of public consideration far out of proportion to their numerical constituency. This same consideration, however, is not accorded to Muslims, even though they form the largest religion in Italy after Catholicism. Thus, it is true that changes experienced by Italian society in the last three decades<sup>10</sup> are not only related to

4 See Chapter 1 of this book.

5 C. Taylor, *A Secular Age* (Cambridge-MA and London: The Belknap Press of Harvard University Press, 2007); see also C. Taylor, "Western Secularity", *The Immanent Frame* (August 10, 2011).

6 To put it in the words of Sigmund Freud, *Das Unbehagen in der Kultur* (Wien: Internationaler Psychoanalytischer Verlag, 1930); see also the English version S. Freud, *Civilization and Its Discontents*, ed. by T. Duffresne, transl. by G.C. Richter (Peterborough: Bradview, 1985).

7 See Chapter 1 of this book.

8 See Chapter 2 of this book.

9 V.N. Roudometof and U. Dessi, *Handbook of Culture and Glocalization* (Cheltenham and Northampton: Edward Elgar Publishing, 2022).

10 That is, when Italy was no longer considered a place of transit, a stepping stone for other destinations, and started becoming the final destination for many regular and irregular immigrants, including a growing number of Muslims.

the presence of Islam.<sup>11</sup> But it is also evident that, given its characteristics, this belief indicates and signals the speedy tendency of the peninsula towards a new cultural scenario. That, in turn, points to constitutional difficulties in light of the tradition of considering Italy's model of law and religions relations on the basis of the Roman Church and a handful of similar (Judeo-Christian) "*confessioni diverse dalla cattolica* (denominations other than Catholicism)," as Article 8 of the Constitution meaningfully calls them.<sup>12</sup> To such an extent that this model has increasingly come to be seen in terms of negative externalities: while specifically recognizing rights and benefits in favour of the Catholic Church and few minorities, Italy's "majority religion model"<sup>13</sup> produces unreasonable distinctions against all other beliefs.

Islam is an illustrative, prominent example in this regard.<sup>14</sup>

It is especially the case when attention is focused on the interaction between the state law and Islamic groups, under which some issues are more significant than others, depending on two types of Muslims' claims: parity claims and specific claims.<sup>15</sup> It should be acknowledged that the parity claim seeks to bestow those groups with the same rights and benefits other minority religions already enjoy through Article 8.3 of the Constitution and the related *intese* (understandings), from whence two tendencies have come in the last 40 years. First, following the bilateralism method originally provided for the Roman Church under both the 1929 Lateran Pacts and Article 7 of the 1948 Constitution, the system of *intese* has been characterized by a substantial similarity of all understandings in force so far.<sup>16</sup> Second, the common legislation of this sort<sup>17</sup> tends to exclude Muslim

11 See Chapter 3 of this book.

12 In this book, all translations (from Italian, Latin, and French etc.) into English are mine, unless otherwise indicated.

13 S. Ferrari, "Constitutional Models of Law and Religion Relations in Western Europe", in S. Mancini (ed.), *Constitution and Religion* (Cheltenham-UK and Northampton-MA: Edward Elgar, 2020) 96–110, at. 105.

14 F. Alicino, "The Italian Legal System and Imams: A Difficult Relationship", in M. Hashas, J. de Ruiter and N. Valdemar Vinding (eds.), *Imams in Western Europe: Developments, Transformations, and Institutional Challenges* (Amsterdam: Amsterdam University Press, 2018) 359–80.

15 C. Joppke, "Constitutional Law and the Integration of Islam in Europe", in Mancini, *Constitution and Religion*, 383–98, where the distinction is between "parity claims and exemption claims": "Parity claims seek to bestow religious Muslims with the same rights and privileges that the Christian majority already enjoys—they are an "extension of existing church-state arrangements for Christian denominations." By contrast, exemption claims seek different treatment, in deviation from existing arrangements, to accommodate religious minority norms" (at 386). This could be true in other European states, but, in my opinion, this distinction does not accurately reflect the situation in Italy. For the case of Italy, then, I propose the distinction between "parity claims" and "specific claims."

16 See Chapter 2 of this book.

17 It means that the substantial similarity among of all *intese* that have been approved to date has led to the creation of a "common legislation" that, as such, is far from being considered general law: this legislation is common to all minority denominations that have signed an

#### 4 Introduction

groups precisely because they are seen as “exceptions” in Italy’s religious traditional landscape.<sup>18</sup>

Moreover, the exceptionalism paradigm has been exacerbated by incessant states of emergency,<sup>19</sup> from immigration to religion-inspired terrorism, in the light of which the presence of Islam in Italy has been highly politicized.<sup>20</sup>

One result of this is that almost all Islamic organizations are not even recognized under the 1929/1159 law on *culti ammessi* (admitted cults),<sup>21</sup> which, given the Parliament’s inability to approve a generally applicable law on religious freedom,<sup>22</sup> represents the other legal tool regulating minority religions in the country. As a consequence, in deviation from both the existing bilateralism method and the 1159/1929 law, in order to accommodate their religious rules,<sup>23</sup> Muslims try the way of what we have called “specific claims.” Accordingly, mini-understandings have been signed between some Islamic groups and “specific” branches of public administration at both local and national levels.<sup>24</sup> It remains that these *mini-intese* have nothing to do with the bilateralism method, given that they do not fall under Article 8.3 of the Constitution. On the contrary, they are part of the unilateral law regulating administrative procedure, on the basis of which associations (whose situations could be prejudiced by the measure taken by state authorities) have the right to intervene during rule-making proceedings.<sup>25</sup>

---

*intesa* under Article 8.3 of the Constitution, but it cannot be applied to other minority groups. See Chapter 2 of this book.

- 18 In this sense, the exceptionalism paradigm of Islam is defined as a fusion of religion and politics that stands in contrast to the generally Italian-accepted notion of religion. See Chapter 3. For a different, and highly controversial, notion of “Islamic exceptionalism” see: S. Hamid, *Islamic Exceptionalism. How the Struggle Over Islam Is Reshaping the World* (New York: St. Martin’s Press, 2016); A. Ebrahim, “Islamic Exceptionalism: How Valid Is the Concept of ‘Islamic Human Rights?’”, *Kennedy School Review* (2000) 1:1, 5–15; J. Gerner Hariri, “A Contribution to the Understanding of Middle Eastern and Muslim Exceptionalism”, *The Journal of Politics* (2015) 77:2, 477–90.
- 19 A. Greene, *Permanent States of Emergency and the Rule of Law. Constitutions in an Age of Crisis* (Oxford, London, New York, New Delhi and Sydney: Hart Publishing, 2018).
- 20 See Chapter 3 of this book.
- 21 The Islamic Cultural Centre of Italy (CICI) is the only Muslim associations that has been recognized as a religious legal entity under the 1159/1929 law. See *Decreto del Presidente della Repubblica 21 dicembre 1974, n. 712, Riconoscimento della personalità giuridica dell’ente Centro islamico culturale d’Italia*, [www.gazzettaufficiale.it/eli/id/1975/01/11/074U0712/sg](http://www.gazzettaufficiale.it/eli/id/1975/01/11/074U0712/sg) (accessed July 28, 2022).
- 22 R. Zaccaria, S. Domianello, A. Ferrari, P. Floris, and R. Mazzola (eds.), *La legge che non c’è. Proposta per una legge sulla libertà religiosa* (Bologna: Il Mulino, 2019).
- 23 V. Crisafulli, “voce Fonti del diritto (dir. cost.)”, *Enciclopedia del diritto* (1968) XII, 948; F. Carnelutti, *Teoria generale del diritto* (Roma: Soc. ed. del Foro italiano, 1951) 35; M. Ricca, *Legge e Intesa con le confessioni religiose: sul dualismo tipicità-atipicità nella dinamica delle fonti* (Torino: Giappichelli, 1996) 35; B. Randazzo, *Diversi ed eguali. Le confessioni religiose davanti alla legge* (Milano: Giuffrè, 2008) 55.
- 24 See Chapter 3 of this book.
- 25 Law no. 241, August 7, 1990, *Nuove norme sul procedimento amministrativo*. See N. Colaianni, “Il sistema delle fonti costituzionali del diritto ecclesiastico al tempo al tempo

The issues of mosques, halls of prayer, cultural centres, burial and Islamic rituals, spiritual assistance in places of detention, clothing codes, and religious education, Muslim workers are empirical indicators in this respect.<sup>26</sup>

Through these issues the legal treatment of Muslims has become the discursive symbol of Italy's current religious pluralism. To such an extent that this narrative tends to influence the regulation of other sensitive problems, such as those referring to personal status, from marriage and divorce to *kafala* and inheritance, in relation to which the rule of law and the rule of Sharia often appear to be an odd couple of sorts, opposed in many respects. At the same time, this tendency goes hand in hand with relatively recent alarming problems, like the COVID-19 pandemic and the Russia-Ukraine conflict,<sup>27</sup> thus further stirring a sense of fear and insecurity. In turn, the rising level of uncertainty fuels suspicions toward Islam, often considered not only as a threat to political and social stability but also as an undemocratic religion that, for instance, does not accept church-state separation and, worst of all, drives its believers to illicit practices and conducts.

As such, Muslim groups are constantly subject to at least two kinds of tests: the test of being a religion under Article 8 of the Italian Constitution and the test of being communities whose rules are compatible with a constitutional democracy.<sup>28</sup>

For all these reasons, looking at the legal status of Muslims in Italy helps in analysing how domestic and external causes could touch on the raw nerve of the historical dilemma between the principle of equality and the right to be different. Furthermore, it helps to better appreciate how the unpredictable reality of glocalization and the logic of permanent emergency impact on the secularity of the state, the rule of law, and the protection of human rights, which, even though differently defined, remain indispensable devices to a functioning and pluralistic democracy, in the western sense of the term.

So, as said before, the core of this book is the relation between constitutional democracy and Islam, which in the first chapter I shall describe through some exemplars of historical reconstruction that have led to the emergence of European secularized models of constitutionalism.<sup>29</sup> In this perspective, I shall also examine if and when Islam has taken part in such a story, the role the Islamic tradition has allegedly played in it. This will provide a better opportunity to analyse the characteristics of Italy's constitutional model of law and religion relations,

---

dell'emergenza (e oltre?)", *Rivista Associazione Italiana Costituzionalisti AIC* (2020) 4, 209–27.

26 See Chapter 4 of this book.

27 In which, once again, religion is playing a central role, to such an extent that this war has been described as “the first religious war in the 21st century”; L.N. Leustean, “Russia's Invasion of Ukraine: The First Religious War in the 21st Century”, *The LSE Religion and Global Society Interdisciplinary Blog* (March 3, 2022).

28 See Chapter 5 of this book.

29 For the terms “secular,” “secularization,” “secularity,” and “secularism” see G. Davie, “Religion, Secularity, and Secularization in Europe”, in G. Davie and L.N. Leustean (eds.), *The Oxford Handbook of Religion and Europe* (Oxford: Oxford University Press, 2021) 318–35.



## 6 Introduction

traditionally influenced by the hegemonic presence of the Catholic Church and a few denominations other than Catholicism. The fact is that this model now has to deal with cultures and beliefs other than traditional ones, as is the case of Muslims who, all together, represent nowadays the second-largest religion in the country.

Muslims in Italy, however, do not belong to a monolithic reality. They may constitute an ethnic, linguistic, and national minority. None of these elements, however, can be used to organically label an “Italian Islam”—as it has been called<sup>30</sup>—which actually performs through a multiplicity of systems of thought, teaching, lifestyle, and behaviour. Therefore, it is important to clarify the relation between Muslims and Islamic law, namely Sharia, which is the specific aspect of the third chapter, where a reverse perspective is also taken into account; that is, the way authorities and public opinion react when meeting Muslims and Sharia in the context of the Italian constitutional democracy.

This will lead to a question that, behind a veil of apparent simplicity, is very difficult to answer: who really are the Muslims in Italy? To this question is specifically devoted the fourth chapter, where attention has also focused on the varying characteristics of Islam in Italy, which offers a unique insight into practical problems of freedom of religion, like those arising from places of worship, funeral and burial rituals, the Muslim prison population, religious dress, child education, and labour law.

As argued in the fifth chapter, these issues shed light on the fact that it is not only about Islam but also, and above all, about Muslims who, while living in a given socio-political context, interpret religious sources in order to define what Sharia shall be. That is more evident when referring to sensitive questions of personal status such as marriage, divorce, adoption, and inheritance. At the same time, these political and legal concerns go together with old and new emergencies, such as immigration and international terrorism, thus further complicating the reasonable application of the supreme principle of secularism, which is fundamental to a functioning and pluralistic Italian constitutional democracy.<sup>31</sup>

30 Italian Ministry of the Interior, *National Pact for an Italian Islam, Expression of an Open and Integrated Community, Adhering to the values and Principles of the Italian Legal System* (February 1, 2017), [www.interno.gov.it/it/amministrazione-trasparente/disposizioni-general/atti-general/atti-amministrativi-general/decreti-direttive-e-altri-documenti/patto-nazionale-islam-italiano](http://www.interno.gov.it/it/amministrazione-trasparente/disposizioni-general/atti-general/atti-amministrativi-general/decreti-direttive-e-altri-documenti/patto-nazionale-islam-italiano) (accessed August 25, 2022).

31 On Italy's supreme principle of secularism see Chapters 2 and 3 of this book.