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Rethinking Canadian Discourses of "Reasonable Accommodation"

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Abstract
This paper maps the repercussions of the use of reasonable accommodation, a recent framework referenced inside and outside Canadian courtrooms to respond to religiously framed differences. Drawing on three cases from Ontario and Quebec, we trace how the notion of reasonable accommodation—now invoked by the media and in public discourse—has moved beyond its initial legal moorings. After outlining the cases, we critique the framework with attention to its tendency to create theological arbitrators who assess reasonableness, and for how it rigidifies 'our values' in hierarchical ways. We propose an alternative model that focuses on navigation and negotiation and that emphasizes belonging, inclusion and lived religion.

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1. Introduction

Recourse to the notion of Reasonable Accommodation (RA) has been gaining momentum since 2007 in Canada: RA has become the dominant framework used to discuss cases of religious differences (see, Beaman, 2012; Barras, 2016; Selby, Barras, & Beaman, 2018). RA was initially limited to the field of human rights in employment situations and referenced in legal decisions. It was conceived to ensure that 'neutral' rules and laws could be adapted if they discriminated against individuals who, because of their age, religion, health, etc., did not correspond to the average individual for whom the rule was designed. Following the Supreme Court of Canada's emphasis of RA in its 'Multani decision' in 2006, the notion became part of public parlance. That decision stipulated that the request by a Sikh student to wear his kirpan at a Montreal public elementary school should

be 'reasonably accommodated'.[1] This judgment sparked strong reactions, especially in the province of Quebec, where "much of it focused on the idea that there was simply 'too much' accommodation happening" (Beaman, 2012, p. 3). The Quebec government struck a commission in 2007 to examine how to deal with increasing social diversity. It became known as the Bouchard–Taylor commission, so named after its commissioners, sociologist Gérald Bouchard and philosopher Charles Taylor. Although their resulting report emphasized the legal nature of RA, it also significantly contributed to the perpetuation of RA as a framework for the management of difference in civil society. It became acceptable for concerned citizens, politicians and the media to evaluate whether specific religious practices are 'reasonable', and whether they are compatible with 'Canadian values'.

Concern with "'too much' accommodation" (Beaman, 2012, p. 3) is not limited to the province of Quebec.

[1] For more information on this case see Multani v. Commission scolaire Marguerite-Bourgeoys (2006).

In conceptualizing our analysis, we chose two cases from the province of Ontario, in part to interrogate the common idea that the ways that questions around diversity are framed in Quebec differ significantly from the rest of Canada. While there are specificities in how Quebec manages religious diversity,[2] the use of the RA framework ultimately transcends provincial boundaries. If, in its ideal form, multiculturalism purports to position everyone as equal, RA differs in that one group dispenses an accommodation. This approach also differs in that multiculturalism is a policy (instituted in 1988), an ideology and a descriptor of demographic realities in Canada's larger urban centres, while RA can be described more as a technology of governance. Throughout our analysis, following Wilde and Tevington's (2017) notion of 'complex religion', we are guided by the conceptualization of religion as necessarily understood as being intertwined both with other social categories such as ethnicity and class and with social inequality.

We argue that the public use of RA further shifts everyday interactions that begin as 'non-events' into 'events'. There has been little scholarly or media emphasis on 'non-events', likely because they are neither memorable or noteworthy. By 'non-events', we mean those interactions that characterize everyday life between people who do not necessarily share common identities or backgrounds. Such interactions increasingly characterize late modern Western democracies, which some have argued have entered an era of "super" diversity (Knott, 2015; Meintel, 2016; Vertovec, 2017). Historians especially have worked on how particular moments of interaction become 'events' (Sewell, 1996). Political scientists have also pointed to the social construction of particular interactions as 'events', emphasizing how language can work to transform strings of occurrences into teleologically meaningful 'events' (Basta, 2017, p. 23; Wagner-Pacifici, 2017).

This article examines three Canadian cases that, with the introduction of this framework of RA, transitioned from 'non-events' to 'events'. Each involves religion and the negotiation of its practice: a sugar shack case in Quebec in 2007, about the negotiation of Muslim prayer and dietary needs (hereafter referred to as the Sugar Shack case), a student's request on religious grounds at York University in Ontario in 2014, for exemption from group work with women (the YorkU case), and debates at a public school board in the Greater Toronto Area, Ontario, in 2017, around the form and presence of Muslim prayer in public schools (the Peel School Board case). Significantly, even if the Sugar Shack case, for one, cannot be legally qualified as RA because there was no strict violation of equality rights, we show how it became framed as such in public discourse by those against the Muslim group's participation.

After briefly sketching the three cases, we argue that, despite its promises of equality, the RA framework disadvantages minorities because it opens debate about the

parameters of 'reason', which triggers normative power structures. In turn, we see a hardening of 'our values' vis-à-vis minorities, and a rigidifying of Islam in particular. Both processes activate an 'us' versus 'them' structure. In the last section, inspired by our study in *Beyond Accommodation* (Selby et al., 2018) and the work of James Tully, we seek to shed light on the processes of navigation and negotiation of difference woven through these three cases. We argue that focusing on processes rather than on outcomes reveals frameworks of inclusion, belonging, and lived religion.

2. The Three Cases

Religion shapes and is shaped by the media (Campbell, 2010; Lövheim, 2012). Media analysis can reveal a great deal about how social actors frame their own actions and those of others. Our aim here is not to produce an exhaustive quantitative media analysis. Rather, drawing on editorials and articles published in *Globe and Mail*, *National Post*, *Toronto Star*, *La Presse*, regional media coverage when available, press releases, recorded statements from public meetings, and publicly available school board minutes, we seek to reconstruct these cases' timelines and prevalent discourses.

2.1. Prayer at a Quebecois Sugar Shack

On 11 March 2007, about 260 Muslims from the Centre Communautaire Astrolabe [the Astrolabe Community Centre] visited the Au Sous Bois Cabane à Sucre [the "Under the Woods" Sugar Shack] in Mont-Saint-Grégoire, 48 kilometers southeast of Montreal, Quebec. The group had reserved a private dining room, had pre-arranged for pork products to be removed from dishes, and had provided substitute halal sausages and salami. During their visit, the group also planned to make maple taffy, visit the on-site petting zoo and go on a sleigh ride. It was the fourth year the organization had visited this sugar shack.

March 11th was a beautiful and sunny Sunday and the sugar shack was busy. When the group members had finished their meals and began to move chairs to create a prayer space, as had previously been negotiated, the sugar shack's management suggested that the group use the dance floor in a common area instead, so that other patrons could move more quickly into the dining area. At the time, there were 15 to 30 patrons waiting for a table. Traditional French–Canadian music played and some children danced while they waited. The group agreed to pray in the dance floor area (Astrolabe, 2007b). To facilitate prayer time for approximately 40 people in the group, the music was temporarily turned off and patrons were asked by the management to stop dancing.

Unbeknownst to the Astrolabe group, a Quebecois country singer, Sylvain Boily, who was waiting in the dance area with about 20 members of his extended family, was offended by the temporary switch of the

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[2] See Bouchard and Taylor (2008) and Kaell (2017).

dance floor into prayer space. Boily took his complaint to the *Journal de Montréal*, which published three articles about his experience one week later, marking the beginning of a media storm (Nadeau, 2007a, 2007b; Roy, 2007). One article featured an interview with Boily in which he expressed his negative reaction and a response by the President of Astrolabe about why the dance floor was cleared. For Boily, "it [was] a *Quebecois* sugar shack" where "*they* thought they were allowed to do anything" (Roy, 2007, our translation and emphasis).

The story gained momentum when proprietors of other sugar shacks were quoted expressing discontent with the "unreasonable accommodations" that had been accorded to the Astrolabe group. Under pressure from over one hundred hate phone messages, the Au Sous Bois sugar shack reversed their previous arrangements with Astrolabe, indicating that they would no longer negotiate similar types of arrangements (Baillargeon, 2007).

Articles in the *Journal de Montréal* and others (e.g., CTV, 2007; LCN, 2007), framed the incident as one of RA, despite the fact that Astrolabe had made efforts in their press-releases and communications with reporters to explain that the agreement was a private financial transaction (Astrolabe, 2007a). The group noted that in perpetuating this inaccurate information the *Journal de Montréal* trespassed journalistic ethics (Astrolabe, 2007a).[3]

For this Muslim association, visiting the shack as a group was part of its overall mission to "foster positive integration" (Astrolabe, 2007b, p. 7). However, once the *Journal de Montréal* published an article based on a conversation with Boily, their 'non-event' visit became an event.

2.2. A Gender-based Religious Request at York University

On 20 September 2013, a sociology undergraduate student who was registered in a second-year online course sent an email to his professor, Paul Grayson, requesting exemption from a group project on the grounds that "due to my firm religious beliefs…it will not be possible for me to meet in public with a group of women" (cited in Grayson, 2013). While an online course, Grayson's syllabus stipulated that students must meet for a focus group assignment. Grayson believed that the student's request should be denied but sought advice from the Dean's office and the university's Centre for Human Rights prior to responding to the student.

The Faculty of Arts and Professional Studies at York University replied to Grayson that the student's request for RA must be granted, based on the province's Human Rights Code that stipulates a "duty to accommodate" if the religious accommodation does not cause "undue hardship" to others (as cited in Moon, 2014; OHRC, 2015). The faculty representatives also considered what they saw as a comparable accommodation granted by Grayson to another student who could not participate in the same group project due to physical distance. Grayson,

however, strongly opposed the decision of the Dean's office, stipulating that, in a secular institution, women's rights must supersede religious ones.

Prior to responding to the student, Grayson sought to determine the theological legitimacy of the request and consulted with York University colleagues specializing in Judaism and Islam who, he says, both indicated that "there is absolutely no justification for not interacting with females in public space", (Grayson, 2013, p. 7). When, in addition, Grayson received his department's support to deny the request, he ignored the administration's advice and emailed the student to inform him of his decision to deny the request. In his response, the student thanked Grayson for how he managed his request and wrote that he respected his decision (Grayson, 2013, p. 6). The university, however, did not rescind its order to accommodate.

Dissatisfied with York's official position on the matter, Grayson contacted an editor at *University Affairs* (UA), a weekly online Canadian university community news magazine, to enquire about publishing his version of the case. The magazine's chief editor was initially hesitant due to UA's editorial practice to not "publish exposés" (cited in Charbonneau, 2014), but decided to publish Grayson's piece without naming him or York University. Hours after the article was published online, the *Globe and Mail* and the *Toronto Star* reported on the issue, identifying both professor and institution (Bradshaw, 2014; Slaughter, 2014). From there, multiple media sources in and beyond Canada (e.g., Aliénor, 2014) reported and commented on the request and responses. Most of the subsequent publications condemned York University's "unreasonable" decision (Ottawa Citizen, 2014a; Teitel, 2014).

The YorkU case made headlines for approximately three months after the request was denied by Grayson. Prior to appearing in UA and other media, it had been a university specific issue. However, Canadian politicians (see, Hopper, 2014) and the first headlines to report the story framed it as one with wider national ideological implications regarding the parameters of "reasonable accommodation", the secular nature of the university, and the rights of women.

The student involved did not publicly comment on it or provide his version of events (Grayson shared a portion of his original email with us), so we do not know whether he considered his request a demand for RA as those who received his inquiry assumed. It appears, however, that the matter was resolved in a manner acceptable to the student.

2.3. The Ontario Peel District School Board and Muslim Prayer

In September 2016, the Peel District School Board (PDSB) replaced a policy that allowed Muslim students to write and share their own sermons for at-school Friday prayers. Until the policy change, the high school students' weekly

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[3] The Bouchard–Taylor Report came to a similar conclusion in its analysis of the Au Sous Bois sugar shack controversy (Bouchard & Taylor, 2008, p. 57).

jummah prayer and closing sermon had been supervised by a school staff member (Smee, 2017). The new decision meant that, in consultation with the Peel Faith Leaders' Group,[4] the Board developed six pre-written sermons, from which the students could choose (Boisvert, 2016). Despite a climate of increasing Islamophobia and surveillance in Ontario (Statistics Canada, 2017), the board explained that the new policy was a procedural change aimed at ensuring consistency across the division (Peel Board, 2017b, p. 133).

In October 2016, at a public meeting following the updated policy, Muslim students and parents voiced their unhappiness with the new policy. One student noted it was "policing religion" (cited in Boisvert, 2016). Others expressed concern with the board's lack of transparency, that Muslim students were made to feel stigmatized, and that freedoms of speech and religiosity were unduly restricted (Alphonso, 2017). A month later, the Board decided to suspend the new policy. In a surprising turn, after conducting community consultations and seeking legal advice, the Board officially reverted to the previous policy (where students could write their own sermons) in January 2017. Nevertheless, the tide had shifted: the debate had become an event. Protesters, carrying anti-Islamic signs, attended and uttered racially charged comments (Fraser, 2017). The question changed from being about whether the board should change its regulations around Muslim prayer to whether the district should allow Friday prayer or any kind of religiosity in public schools (see, Goffin, 2017). Tensions peaked in a March 2017 board meeting when a protester ripped pages out of a Qur'an (Spencer, 2017c).

In response to this pronounced escalation in the debate, the Ontario Minister of Education and the Minister of Children and Youth released a joint statement in support of providing Friday prayer space for public school students (Sarrouh, 2017). The Peel Board noted that accommodation of Friday prayer was a procedural matter and that, under the Ontario Human Rights Code, was not open to public debate (Peel Board, 2017a). The board also published a two-page "Fact Sheet on Religious Accommodation" (Peel Board, 2017c) that referenced the Ontario Human Rights Commission's Code and statements to re-establish the right of visible religiosity in public schools.

In sum, while until the first policy change weekly communal prayer at school had been treated like all other extra-curricular activities, the initial change in regulation exposed Muslim students to public scrutiny (Smee, 2017). The procedural question took many turns that emphasized public debate about prayer in school more generally.

3. Discussion

The invocation of RA as a response has numerous implications, including the promotion of a theological adjudication, authorized by the usage of the legal notion of 'sincerity of belief';[5] and a juxtapositioning of 'our values' against 'the other', triggered in part by the appropriation of the legal notion of "undue hardship".[6]

3.1. Granting Theological Authority

Determining what is 'reasonable' encourages individuals assessing religion-based requests to become religious arbitrators in ways that other kinds of requests do not. The question requires those in positions of authority to determine what is legitimate and necessary to the religion to which requesters belong and determine the precepts of said religion(s). This theological impulse also emboldens commentators to express an opinion on the sincerity of the requester. Religion is assumed to be a stable and rigid category.

The York case illustrates these dynamics. The professor, the administration, the media and the broader public all framed the student's question as a request for RA, which in turn authorized them to evaluate the student's request on the basis of its reasonableness, the sincerity of the requester and the degree of hardship the request might cause (Moon, 2014). Recall that Grayson consulted with scholars of Islam and Judaism at York University—who he 'theologically collapses' and calls "Muslim and Jewish scholars" rather than "scholars who study Islam and Judaism" (Grayson, 2013)—to evaluate whether the student's request was theologically reasonable. He clearly felt that to assess the reasonableness of the claim he needed to 'know' the normative requirements of the faith of his student. The language of RA granted him the authority to determine which practices were 'reasonable'. In so doing, he became trapped in a dualistic reading of religion (either it is reasonable or it is not), as though there were one way to be properly Muslim or Jewish. This determination counters the research of scholars of lived religion (McGuire, 2008), which emphasizes the flexibility and variability of religious practice.

Grayson (2013) was not the only self-appointed theological arbiter: religious leaders interviewed by the media, like in the *Ottawa Citizen*, were asked to provide a yes-or-no answer to whether the University should accommodate the student. Commentators not only speculated about the student's religion and level of practice—determining that he was most likely a conservative and practicing Muslim, or maybe a Jew—but they also con-

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[4] The Peel Faith Leader Group included a few imams and the Equity Staff of the Board (Peel Board, 2017b, p. 132). When the Board chose to conduct additional consultations, it met with a wide range of social actors, including students (Peel Board, 2017b, pp. 132–134).

[5] For more on how the notion of 'sincerity of belief' has been used by Canadian courts, see Beaman (2012) and Maclure (2011).

[6] The legal concept of undue hardship, whereby employers are legally required to accommodate as long as they do not suffer undue hardship (see, Woehrling, 1998), creeps into public debates. Requests for accommodation are often assessed vis-à-vis the challenge or hardship they pose to 'our values'. While institutions are legally required to provide evidence of this undue hardship and not base their claims on speculations, these provisions are rarely considered in public debates.

sidered it their responsibility to evaluate the content of these traditions. One pastor concluded that the young man sought to advance "his brand of Islam, which would deprive women of their dignity" (Rev. Counsell, cited in Ottawa Citizen, 2014b). A Baha'i scholar assumed that the York request was based on "Sharia law" and warned of a "slippery slope" (Mclean, cited in Ottawa Citizen, 2014b). Emma Teitel (2014) of *Maclean's* magazine similarly presumed that the student must be either an Orthodox Jew or an Orthodox Muslim, and concluded that his "accommodation request" was outside the precepts of these religions. These responses significantly delimit the parameters of what is a 'reasonable religion' in a Western liberal context (cf., Berger, 2012). They are also vulnerable to sensationalism, as well as Orientalist and Islamophobic commentary.

Despite that the religious affiliations of the members of Astrolabe in the Sugar Shack case and of the students in the PDSB case were obvious, commentators nevertheless opined about Islam, and did so in a fixed and often inaccurate manner. In the Sugar Shack case, Astrolabe members were inaccurately described as having requested the menu to be changed for all patrons in the restaurant, not only for their group, and as having asked patrons in the dance room to exit while they prayed (Astrolabe, 2007b; see also, Nadeau, 2007a). Reporters also consulted religious experts to explain why Muslims do not eat pork, again relying on a static understanding of Islam (see, Baillargeon, 2007).

In the Peel case, Muslim practices were described as patriarchal and as too often requiring special treatment (see, Bush in Peel Board, 2017a). When the debates shifted to thinking about the place of prayer in public schools more generally some statements became overtly Islamophobic. In one instance, Islam was associated with hatred and "poison" (Spencer, 2017a), and in another, a former Mississauga mayoral candidate distributed flyers during a board meeting stating that the Qur'an should be "banned as hate literature" (Johnston, cited in Spencer, 2017b). In determining the 'reasonability' of religious beliefs and practices, the RA framework enabled what we see as a neo-colonialist power dynamic that it emboldens the accommodator to freely judge the '(un)reasonability' of religious belief and engage in theological judgments.

3.2. Rigidifying 'Our Values' and 'Islam'

In addition to the evaluation of the content of religion, assessing the 'reasonability' of RA also triggers determination of the request's compatibility with fixed societal values. Built on inherent power asymmetries (Barras, 2016; Beaman, 2012; Berger, 2012; Selby et al., 2018), the RA framework requires a determination of whether a request fits within the benchmark of 'our values', which in turn are constructed as stable, easily definable, ahistorical and unchanging.

In the wake of the country singer's account in the *Journal de Montréal* about the Astrolabe group, subse-

quent news stories emphasized the responses of other sugar shack owners as to whether the dietary and space negotiation were part of a shared Quebecois tradition. One article entitled '*Our traditions* need to be respected' (our emphasis) opened with the President of the Association of Sugar Shack Owners, who responded "Unacceptable" when asked to assess the RAs taking place in Quebecois sugar shacks (Nadeau, 2007b). The president stated: "Pork is part of the sugar shack experience and it is not normal to deprive Quebecois [of it]". "Our traditions" or 'the Quebecois values' are recurrently formulated as under threat. For the owner of the *Ancestral* cabin, sugar shacks "represent our origins". Another cabin owner stressed the importance of eating pork to honour Quebec's history: "All the meals are made with lard. I'm not about to cook my beans [mes fèves] with olive oil" (cited in Baillargeon, 2007). A similar expectation of 'reasonability' was echoed by the President of the Agricultural Producers' Union: "In the sugar shack, people have to have *the reasonable expectation to eat pork*" (Laurent Pellerin, cited in Baillargeon, 2007, emphasis added). Menu control here is a mechanism to protect the boundaries of 'our' identity from a 'foreign', or, as one cabin owner put it, an "olive-oil-using" threat. It is no accident that identity politics become heated in relation to food, a linchpin for many groups in delimiting shared identity (see, Brown, 2016). The requests of vegetarians, vegans and other allergens are notably omitted from this lens.

As evident with Professor Grayson's concern for "a public secular university with a commitment to equality" (Grayson, 2013, p. 3), public schools and universities are also commonly conceived as spaces that embed and promote national values, and as institutions within which to educate future citizens. Public schools were often identified in the PDSB debate as secular institutions with the mission of cultivating and protecting Canadian values from the 'intrusion' of religion (see, for instance, Banerjee delegation in Peel Board, 2017a, para. 14). More specifically, Muslim prayers were framed as synonymous with gender segregation, antonymic to the mission of public schools.

It is noteworthy that in the Peel case participating parties came from a more diverse number of self-identified backgrounds than in the Sugar Shack case where the 'us' appeared to represent pure laine ("old stock") Quebeckers (see Bouchard & Taylor, 2008, p. 202). Some PDSB protesters contested the accommodation of Muslim prayer on the grounds that it infringed on Canadian Christian culture (McGillivray, 2017), while others, who identified as having South-Asian origins or representing Hindu groups, argued that the presence of Muslim prayer was incompatible with the secular nature of schools (Hassan, 2017). We see, therefore, how the boundaries of the 'us' and 'them' dichotomy vary in function of context.

Nonetheless, despite this variability, the 'us–them' structure is systematically built on a hierarchy of val-

ues, where gender equality, 'mutual respect' and 'tolerance' are associated with Canadian-ness, and Islam is not. These 'Canadian values' are understood as accomplished rather than ideals. They become the benchmark against which to evaluate the '(un)reasonability' of religious requests. The YorkU case exemplifies this hierarchy, as gender equality was identified as *the* Canadian value, symbolizing progress to be ferociously defended against 'archaic' practices. Few commentators emerged who countered this position. The then Canadian Conservative Federal Minister of Justice, Peter MacKay, commented on the student's request, linking it with the Canadian mission to Afghanistan and its enabling of "millions of girls" to attend public schools (MacKay, cited in the Canadian Press, 2014; see also, Hopper, 2014). Other politicians also commented on the case as a way to position themselves on Canada's progress, stressing that: "We live in a country seeking gender equality....This is Canada, pure and simple" (Judy Sgro, Liberal MP, cited in Hopper, 2014). Again, the voice of the student, the complexity of the affair, and the fact that some media comments might feed into a growing Islamophobic climate in Canada, are inaudible in this dichotomous framing. Making gender equality a Canadian value par excellence also conveys the idea that gender violations are foreign to Canadian modern life, failing to recognize the pervasive discrimination against women in contemporary Canadian society (see, Beaman, 2014; for a more general discussion see also, Aune, Lövheim, Giorgi, Toldy, & Utriainen, 2017).

Likewise, secularity in both the PDSB and the YorkU cases is assumed to be about the exclusion of religion from public institutions. There is no discussion about the paradoxes—and perhaps even impossibility—of this claim in Canadian institutions, where Christianity remains deeply embedded (Barras, Selby, & Beaman, 2016).

4. Processes of Negotiating Differences

How then to move away from the problematic RA framework? To explore how parties involved in our three cases negotiated difference amongst themselves in ways that can be considered as 'non-events', we turn to the work of James Tully, which we read alongside the navigation and negotiation framework we develop in *Beyond Accommodation* (Selby et al., 2018).[7] We see navigation reflecting the internal juggle of how individuals aim to enact and live religious ideals, and negotiation entailing external interaction with others.

Tully has written extensively on the negotiation of difference, and he invites us to examine the "activity of disclosure and acknowledgement [of difference] on its own terms" (Tully, 2000, pp. 479–480). Examining process[8] or, as Tully puts it, "the activity of acknowledgement",

enables us to reveal dynamics woven in our three cases that are otherwise overlooked when the focus is on determining the 'reasonability' of a request (see also, Tully, 2000, p. 471). Turning our attention to processes of navigation and negotiation enables us to uncover how individuals in these cases draw on notions of inclusion and belonging. If 'events' tend to be narrated around the results of cases, we examine the multiplicity of 'non-events' lodged (and typically ignored) in these interactions. Our navigation/negotiation framework emphasizes how processes of interaction influence the construction of identities (including religious identity) and reveals their flexibility and lived dimensions. The recognition of difference might not always be deemed successful, but constitutive interactions are significant. They are part of the story of Canadian diversity.

4.1. Astrolabe: Belonging at The Sugar Shack

Astrolabe's contract with the Au Sous Bois sugar shack owner is not unique. Karim (fictious name), a 30-year-old gregarious young man who participated in the study presented in *Beyond Accommodation*, similarly described how an association to which he belonged organized a popular annual outing to the same sugar shack with similar negotiations regarding food. Karim explained that theirs was an ordinary transaction between a client and business owner: "They [the owners of the sugar shack] were super cool about it, yeah. They were, they were a great sugar shack to go to".

After 2008, however, in reaction to the media frenzy around the Astrolabe controversy, the Au Sous Bois sugar shack owners refused to engage in dietary negotiations again. In telling us the story, Karim appeared to hold no rancor and was even empathetic to the owners' plight. He noted: "It's, I mean, understandable. You know?" In this case, the public debate shifted the terms of his group's previously positively experienced interaction so that their request to bring their own meat became unreasonable, or in his words, "a headache". In a negotiation-style narrative, the Astrolabe group explained that the outing to the sugar shack aimed to foster a sense of common belonging or, as they say, "positive integration" for their children, who could partake in and contribute to a Quebecois event (Astrolabe, 2007b). Because menus are no longer adapted, they can presumably no longer attend.

Astrolabe thus proposed an understanding of belonging that differed from the dominant media narratives. For them, belonging—living well together—was not about complying with set values (Beaman, 2016, p. 4). Rather, it was about the process of being able to engage and craft these common values and experiences together (see, Selby et al., 2018). To do so, their religious differences needed to be recognized and under-

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stood and the power dynamics of the encounter acknowledged to make this recognition relational (Tully, 2000, p. 476). These measures do not aim to heighten identity politics, but to enable contribution and ultimately build a shared experience. We see Astrolabe's approach as promoting a more inclusive and promising understanding of living well together.

4.2. Thinking about Inclusion Through Prayer in Peel District Schools

There are similar moments in the Peel board prayer saga that have been ignored by scholars, the media and the public: by all accounts, the initial arrangement that was put in place two decades earlier was working well. It is worth reflecting on when the debate shifted. Early on (prior to January 2017), debate focused on how Muslim students thought that the regulation changes were a violation of their religious freedom. Perhaps for this reason, the discussion received little attention. Only one media account described students' experiences of prayer in schools, including the reasons why it is an important aspect in their development as young adults (see Alam, as cited in Galloway, 2017). This account illuminated the processes of navigation with which praying students engaged and recognized their religious difference.

In an interview on a national radio program, Zoya Alam, a lawyer advising the students and a former Muslim student in the Peel region, provided insight on her own experiences of Friday prayer at school that speak to this erasure:

> I would go [to weekly prayer at school] and it was a time to balance my teenage life with balancing my faith. It was also a time for me to be social, to meet with my friends. There would also be a sermon, and that sermon would be about things, you know, [like] how to manage stress….It was really important that a religious student was able to give that sermon because that way it was more relatable to me….Navigating teenage life and also your faith. (Galloway, 2017)

Alam explained the value of having another student give the sermon, which she felt better related to her life and challenges, rather than relying on pre-written administration-approved sermons. For her, Friday prayer at school was about her relationship with her faith, but also with her friends (Galloway, 2017). She said that one sermon about "charity and giving back" helped her decide to work in legal aid. Alam's comments highlight her processes of cultivating multiple identities and senses of belonging.

Notably, the Peel controversy might have been avoided if the board had consulted students when it first considered changing the regulations. Stories grounded in everyday experiences like Alam's could have better informed their initial decision. In a common reflex by secular boards evaluating religious requests, the board consulted a small number of imams, a move that tends to privilege gatekeepers in gendered and class-blind ways (Phillips, 2007; Selby, 2013). When the school board meetings became a mediatized event, the board attempted to redress the situation by listening to students. They tried, at this point, to privilege what Byrne (2014, pp. 60, 65) calls "active inclusion" by consulting students in all the stages of their discussions.[9] In part, these discussions led them to revoke their policies, which Alam appreciatively noted (see Alam, cited in Galloway, 2017). The board stated that their goal was not to determine whether prayer in school was reasonable, but to cultivate processes of greater equality. This commitment to inclusion is apparent in its circulated documents that emphasize a climate for students to "feel safe and welcomed" and in its public acknowledgment that public debate was at times Islamophobic (Peel Board, 2017c). The Board eventually recognized the power asymmetries and hateful nature of the controversy, which we see as a necessary step to foster a climate of active inclusion.

These efforts also reflect a different perspective from which Canadian diversity can be negotiated. Granted, they are subtler and less essentialist stories than the dichotomous and negative portrayals that dominated. Focusing on the processes of negotiation provides insight on how a public institution attempted (whether or not it was successful) to redress its initial lack of inclusivity. We also note the care taken by board members to pick up the pieces of a Qur'an ripped in a public meeting and to bring them to local imams for advice (see, Hussain, 2017), an act which was underreported. Considering these overlooked aspects help us map better procedures as other public institutions, including school and university boards, municipal councils, hospitals are called to navigate and negotiate diverse situations.

4.3. York University and Lived Religion

Lastly, because the York University case was framed as pitting religious freedom against women's rights, the student's processes of navigation and negotiation were entirely ignored. This omission is partly because he chose to remain anonymous and partly because, as we have discussed, many aspects of his identity were assumed, including that he believed in 'archaic' beliefs opposed to 'Canadian values'. Conceptualizing the student's internal navigation sheds light on how he actively crafted a compromise with which he was comfortable. His choice of an online course speaks to how he tried to balance what he saw as being required by his faith with his studies. This navigation did not involve negotiation until he realized that the group component was mandatory. His email to Grayson explained: "One of the main reasons

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[9] Byrne (2014) distinguishes between active and passive inclusion. The passive type "merely opens the door" without modifying the established structure (Byrne, 2014, p. 60). The active model seeks to change the system to "broaden access to enable maximum participation" (Byrne, 2014, p. 60).

that I have chosen Internet courses to complete my BA is due to my firm religious beliefs" (cited in Ottawa Citizen, 2014a). We describe numerous examples of similar internal navigation in *Beyond Accommodation* (Selby et al., 2018). For instance, one young participant, who was a physiotherapy student, shared how choosing this profession was the result of a long thought process where she understood that her desire to help others overrode her prohibition of touching men. She also found comfort in knowing that "ultimately, I want to work with geriatrics. I want to work with older people, the older clientele. So, touching and that stuff, that's not an issue". This complex give-and-take with oneself is overlooked if the focus is only on the external verbal request for accommodation.

Moreover, focusing on the student's navigation also makes us cognizant that he ultimately modified his initial position, and accepted Professor Grayson's decision. We contend that this shift illustrates the creativity of many believers (whether or not they are conservative) in balancing their religious practices with their everyday realities. We make this point not to condone the student's request, but to signal that religious practices are more flexible than how his beliefs were portrayed.[10]

5. Conclusion

Over the past decade, the language of RA has migrated outside Canadian courtrooms and has become widely used to manage religious differences. In this paper we have outlined some of the consequences of RA for religious minorities. We posit that it maintains inequalities, disables compromise, encourages theological adjudication and establishes a benchmark of 'our values', which is rigid and assumes difference where very often there may be none. We are concerned that RA has become normalized to the point that it is increasingly difficult for an alternative imaginary to gain traction. We have illuminated some of the features of such an alternative model.

These three cases gained considerable media attention and became 'events', despite the fact that they had been successfully negotiated. We have shown the dangers of determining the 'reasonability' of requests and how the framework also encourages a solidification of 'our values' to gauge whether a request is acceptable. These dynamics are triggered by how the language of RA is structured. Because the RA framework has traveled from the legal field into public discourse, it has triggered the public re-appropriation of other legal concepts such as the notions of sincerity of belief and undue hardship. Assessors find themselves in a position of significant power. They can feel entitled to evaluate the sincerity of the requester and her belief with little concern for the potential flexibility of her religiosity. Potential undue hardship lodged in her request invokes 'Canadian values', regardless of whether there is actual evidence of hardship. Thus, the ways these 'events' are framed by the media and other commentators tend to project a problematic image of diversity, in which an undefined 'us' needs to be protected against a threatening 'other' and her differences.

Guided by the work of scholars who note the socially constructed dimension of 'events', we content that the RA response can be denaturalized. Our re-examination of these three cases reveals other lenses invoked by interlocutors themselves that more aptly allow for consideration of successful processes of navigation and negotiation that were largely ignored. Rarely did media accounts focus on the perspectives of individuals trying to craft a place for their religiosity. Being aware and acknowledging these erasures speak to the power asymmetries lodged in the RA model and to consider the perspectives of those in less powerful positions. Considering their perspectives requires that we pay attention to processes. Granted, everyday narratives of process will inevitably be less dramatic than a plotline that assesses and affirms 'reasonability'. They do, however, offer a more organic chronicle: stories about entrenched power relations, give and take, interactions, recognition and failed recognition, and most importantly, how difference can successfully be worked out. We contend that these alternative narratives offer a more inspiring and accurate starting point around which to narrate diversity.

Conflict of Interests

The authors declare no conflict of interests.

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[10] Lived religion is also visible in both the Peel Prayer debate, especially in Alam's comments, and in the Sugar Shack case.

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