Sikh Articles of Faith in the Workplace

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I. Introduction

Sikhs began immigrating to the United States around the turn of the 20th century. Nonetheless, most Americans know little about Sikhs and Sikh practices. Observant Sikhs keep certain religiously-mandated articles of faith, including turbans, unshorn hair and beards, and kirpans, that are increasingly misunderstood by the wider American community, particularly in the aftermath of the September 11th terrorist attacks. This fundamental misunderstanding has led to widespread discrimination towards Sikhs in the United States.

Misunderstanding of and, at times, outright discrimination against the Sikh articles of faith often extends to the workplace. Conflicts particularly arise when the articles of faith clash with expectations regarding appearance, or invoke safety concerns. This essay first seeks to demystify the Sikh articles of faith for non-Sikh employers, and provide the historical and contemporary context in which Sikh requests for religious accommodation are made and Sikh-related employment discrimination litigation arises. Second, in examining the types of objections that employers commonly make towards the Sikh articles of faith (in particular,

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turbans, beards, and kirpans), this essay seeks to minimize conflict and promote accommodation of the Sikh articles of faith in the workplace.

II. Sikhism and the Sikh Articles of Faith

The Sikh religion is a monotheistic religion that originated in the late fifteenth century in the northwestern area of South Asia that is known today as Punjab. It is a distinct and independent religion and is not affiliated with any other religion. With over 20 million followers worldwide, Sikhism is the fifth largest religion in the world today.¹

On or about April 14, 1699, the tenth Sikh Guru² decreed that Sikhs should take amrit (be initiated into the Sikh faith), and keep five articles of faith. Since that time, Sikhs have been required, as a matter of religious belief and practice, to take amrit and maintain five articles of faith on or as part of their person. The five articles of faith start with the Punjabi letter for “K”, and are thereby informally referred to as “the Five K’s.” They are Kes³ (unshorn hair), Kangha⁴ (comb), Kara⁵ (steel bracelet), Kirpan⁶ (sword), and Kacch⁷ (undergarment). The Sikh Code of Conduct, called the Rehat Maryada, also requires that practicing Sikhs keep the Five K’s and

² The term “Guru” means “Enlightener.” In Sikhism there were a total of ten living Gurus, all of whom are considered “prophets,” or direct messengers for a higher transcendental power. See also Kapur Singh, Sikhism for the Modern Man, 4th ed., Amritsar: Guru Nanak Dev University, 2000, p. 34.
³ Guru Nanak, the founder of the Sikh faith, started the practice of keeping hair unshorn because keeping it in a natural state is regarded as living in harmony with the will of God.
⁴ The kangha is a small comb that can be worn easily in the hair at all times and is a symbol of cleanliness. Just as a comb helps to remove the tangles and cleans the hair, the kangha is a spiritual reminder to shed impurities of thought.
⁵ The kara is worn to remind a Sikh that he or she is a servant of the Guru and should not do anything that may bring shame or disgrace.
⁶ The kirpan is a religious sword that encapsulates an initiated Sikh's solemn obligation of courage and self-defense. It denotes dignity, self-reliance, and the capacity and readiness to always defend the weak and the oppressed. It helps sustain one's martial spirit and the determination to sacrifice oneself in order to defend truth, oppression, and Sikh moral values. All initiated Sikhs are mandated to carry a kirpan on their body.
⁷ A special, slightly longer type of shorts, the kachh is linked to a high moral character and must be worn at all times. It reminds the Sikh of the need for self-restrain over passions and desires.
enjoins Sikh men and women to cover their heads at all times.\(^8\) All Sikh men wear a turban\(^9\); Sikh women sometimes wear a turban and often cover their head with a scarf.

The articles of faith (the 5 K’s and the turban) are physical manifestations of core Sikh spiritual values, reminding their bearer that her actions should be consistent with her beliefs. They are an external uniform that unifies Sikhs, binds them to the beliefs of the religion, and reminds them of their commitment to the Sikh Gurus at all times. On a personal level, they represent a physical discipline that helps Sikhs to maintain their spiritual discipline. In the societal sphere, they are markings which identify a person as a follower of the way of life revealed to the Sikh gurus and are an exteriorization of the mission given to Sikhs.

Since faith is largely personal, one will likely to hear different shades of answers from different Sikhs about what these articles mean. At minimum, they bind the Sikh to their Guru in an inexplicable relationship of love and faith. Unlike some other faiths where only the clergy are in uniform, all Sikhs are enjoined to wear the uniform of their beliefs. The obligation of Sikhs to keep the articles of faith is a cornerstone of the Sikh religion and is commonly viewed by members of the Sikh faith to be among the central requirements of the Sikh religion.\(^10\)


\(^9\) The turban it has immense spiritual and temporal significance. Wearing a turban declares sovereignty, dedication, self-respect, courage and piety. Sikhs consider the turban to be a precious gift from their Guru and many wash their hands before they begin to tie it. When a Sikh ties a turban, the turban ceases to be just a piece of cloth and becomes one and the same with the Sikh's head. Generally speaking, “[f]or Sikhs, to in any way remove the turban in public or during the course of their professional duties, constitutes a most serious breach of the Sikh code of conduct (*rahit maryada*). It is regarded as an act which disgraces the honor of the individual Sikh and the wider Sikh community.” Arvind-Pal Singh Mandair (Ph.D), Expert Report Prepared for Plaintiff in *Rathour v. New York City Police Dept.*, pg 11.

III. History of Sikh Migration to the United States

Sikhs first migrated from the Punjab region of India to the United States in the early 1900’s, arriving in British Columbia, Canada, in 1902. From Canada they migrated south, settling in the states of California, Oregon and Washington. According to N. Gerald Barrier, a professor of Sikh Studies at the University of Wisconsin, when this group of immigrants first arrived in the United States, “[t]he numbers were not large, but the specter of a ‘Hindu’ or ‘turban’ tide, when combined with the current racial attitudes and fears about Asian immigrants as a whole, caused a backlash and led to a series of administrative and legislative measures that put . . . limits on future migration during the second decade of the century.”

By the 1960’s, however, a second wave of Sikh immigrants from Punjab arrived on the eastern coast of the United States, taking positions of employment mostly in the fields of medicine, science, and business. In addition, in the 1960’s and early 70’s, a number of Caucasian and other Americans converted to Sikhism. A third wave of Sikh immigrants arrived in the United States in the 1980’s and 1990’s, partly as a result of political conflict in their homeland of Punjab. These immigrants have taken a variety of employment positions, ranging from day laborers and taxi drivers to information technology consultants. Today, approximately 500,000 Sikh Americans reside in the United States.

In the aftermath of the tragic events of September 11, 2001, Sikhs across the country were subject to a variety of forms of discrimination and harassment that was largely based on a mistaken perception that they are of Arab or Muslim background or are related to the Al Quaeda

12 Id.
13 Senate Congressional Resolution 74, 107th Congress, 1st Session, (October 2, 2001).
terrorist network. The Sikhs have been disproportionately targeted for discrimination because they wear turbans and keep unshorn hair (including facial hair) in accordance with their faith. Sikhs have been subject to various forms of discrimination including illegal profiling by law enforcement authorities, the commission of hate crimes by civilians (including fatalities), and employment discrimination.

IV. The Accommodation of Sikh Articles of Faith in the Workplace

The Sikh articles of faith that are most often the subject of controversy in the workplace are turbans, beards, and kirpans. When a Sikh makes a religion-based request for accommodation of a turban, beard, or kirpan, the employer’s response often turns on whether there is something about the article that either:

• ostensibly prevents a person from doing his/her job, or
• presents a special danger to the employee or workplace that would not otherwise exist.

A. Overcoming Image-Based Objections to Sikh Turbans and Beards

There are few circumstances in which a turban or beard actually prevents a Sikh employee from doing his or her job. Many employers’ objections are image or appearance-based – in other words, based upon Western cultural values associated with grooming, e.g., that headwear should not be worn indoors and that being clean-shaven is preferable to growing a beard. Often, employers deny a request for accommodation of a Sikh turban or beard under the rubric of “customer preference,” a preference that again relies upon Western notions of grooming.

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14 Human Rights Watch, We Are Not The Enemy: Hate Crimes Against Arabs, Muslims, and Those Perceived to be Arab or Muslim after September 11 Vol. 14, No. 6(G), p. 14 (Nov. 2002) (“HRW Report”).
15 Senate Congressional Resolution 74, 107th Congress, 1st Session, (October 2, 2001).
17 Indeed, the idea that wearing a religious article is intrinsically tied to one’s faith is foreign to most Westerners – until one points out that the clergy of most Western faiths wear special clothing or articles as part of their worship.
and propriety. Courts sometimes are persuaded by that customer preference places an undue hardship on an employer to accommodate a Sikh turban or beard. For example, EEOC v. Sambo’s of Georgia upheld a restaurant’s refusal to hire a bearded Sikh as a manager and found that being cleanshaven was a bona fide occupational qualification for a family restaurant, given customer preference. 530 F. Supp. 86 (N.D.Ga. 1981). See also Ali v. Alamo Rent-A-Car, Inc., 8 Fed.Appx. 156, 2001 WL 218788 (C.A.4 2001) (finding that the employer’s transferal of a Muslim to a position without customer contact because she wore a headscarf was not an adverse employment action).

Image or appearance-based objections are exacerbated where the requested accommodation conflicts with an employer’s uniform or grooming policy. One example is Birdi v. UAL Corp. which upheld an airline’s termination of a Sikh customer service representative whose turban conflicted with a “no headwear” policy, and found that the airline met its burden to accommodate by offering the Sikh other positions without face-to-face customer contact in which he could wear his turban. No. 99 C 5576, W.L 471999 (N.D.Ill. 2002). Employers often refuse to hire Sikhs when a “no beard” policy exists, for example, for car salesmen and law enforcement positions. See, e.g., section IV(B) below and fn. 19.

Not all courts accept “customer preference” or image-based objections as evidence of undue hardship justifying a refusal to accommodate a turban or beard. Kohli v. LOOC, INC. rejected Dominoes pizza chain’s claim that hiring a bearded Sikh as a manager would present an undue hardship despite the employer’s proffered evidence of customer distaste for bearded employees and employees wearing beard nets. 347 Md. 258, 701 A.2d 92 (1995), appealed on other grounds, 103 Md.App. 694, 654 A.2d 922 (1996).
Government agencies that enforce federal anti-discrimination law are taking a stance against image or appearance-based objections to the Sikh articles of faith. For example, in 2005 the U.S. Department of Justice (“DOJ”) filed an employment discrimination lawsuit against the Metropolitan Transit Authority of New York (“MTA”) for forcing five Sikh station agents and one subway train operator (as well Muslim bus drivers) to brand their religious headwear with an MTA logo. (The Sikh Coalition, a civil rights organization, also filed lawsuits on behalf of the Sikh employees.) MTA initially told the Sikh employees that they would have to either remove their turbans or be reassigned to less desirable positions in the rail yards outside of customer view. It then withdrew this stance and instead instituted the turban-branding policy – despite the fact that not all of its uniform headwear contained an MTA logo. It also discriminatorily enforced the headwear aspect of its uniform policy. The U.S. Department of Justice (“DOJ”) conducted an investigation into the allegations of discrimination and found over 200 instances of MTA employees wearing headwear without an MTA logo (e.g., Yankees baseball caps, etc.) over the course of three days.18

The DOJ is not the only federal agency that has taken a stance against image or appearance based discrimination. The U.S. Equal Employment Opportunity’s (“EEOC”) newly revised Compliance Manual (“Compl. Man’l.”) directly advises against employers’ use of customer preference as a basis for taking action. “If an employer takes an action based on the discriminatory preferences of others, including co-workers or clients, the employer is unlawfully discriminating.” EEOC Compl. Man’l. § 12-II(B), rev. 7/22/08.19 In addition,

18 The MTA also asserted a safety in recognizability argument in defending their turban-branding policy. They argued that, in a post-9/11 world, it was imperative for Sikhs and Muslims wearing religious headwear to be recognizable as MTA employees. Otherwise, customers would be confused in an emergency. For additional discussion about safety in recognizability, see section IV(B).
19 The religion section of the EEOC Compliance Manual is available online at http://www.eeoc.gov/policy/docs/religion.html (last checked August 9, 2008).
[a]bsent undue hardship, religious discrimination may be found where an employer fails to accommodate the employee’s religious dress or grooming practices…. While there may be circumstances in which allowing a particular exception to an employer’s dress and grooming policy would pose an undue hardship, an employer’s reliance on the broad rubric of “image” to deny a requested religious accommodation may in a given case be tantamount to reliance on customer religious bias (so-called “customer preference”) in violation of Title VII.

Id. at §12-IV(C)(4)(a).

Where Sikhs’ turbans and beards do not prevent them from doing their job, employers’ refusal to accommodate Sikh articles of faith is in direct contravention to the integrative purposes of state and federal anti-discrimination laws. Employers therefore will open themselves to liability in instances where uniform and grooming policies or customer preference are the only reasons for refusing to provide a religion-based accommodation to a Sikh.20

B. Safety-Based Objections to Turbans and Beards Must be Real

In some instances, employers fail to accommodate Sikh employees’ religious practices because of safety considerations. Safety is obviously a persuasive reason for the denial of accommodation of turbans or beards. See, e.g., Bhatia v. Chevron, 734 F.2d 1382 (9th Cir. 1984) (finding undue hardship where an employer refused to accommodate a Sikh’s unshorn beard because it prevented the employee from wearing a respirator that formed an airtight seal allowing potential exposure to toxic gas); Kalsi v. New York City Transit Authority, 62 F.Supp.2d 745

20 Federal, state, and local governments must also abide by the Constitution and, in the federal government’s case, the Religious Freedom Restoration Act (“RFRA”), in considering how their actions may affect Sikhs in the workplace. The Sikh Coalition is currently settling an image-based case brought under the First Amendment and RFRA against the Federal Protective Service (“FPS”), a federal agency that provides security guard services to federal facilities. FPS refused to accommodate a Sikh contract security guard’s turban and beard – despite the fact that medical and other secular exemptions to its “no beard” requirement existed. FPS ultimately agreed to change its grooming and uniform policy to allow Sikhs to serve as contract FPS guards with their articles of faith intact. See also Fraternal Order of Police v. City of Newark, 170 F.3d 359 (3rd Cir. 1999) (holding that a police department’s refusal to provide Muslim police officers with an exemption to a “no beard” policy for religious reasons, while allowing medical exemptions, was suggestive of discriminatory intent, triggering heightened scrutiny analysis and violating the First Amendment).
(E.D. N.Y. 1998) (finding undue hardship to accommodate a Sikh car inspector’s turban which conflicted with a mandatory hard hat policy in the face of actual evidence of a safety threat).

Courts and plaintiffs, however, will push employers to justify whether such safety objections are perceived or are real. Employers must provide evidence of actual threats to safety that support their denial of religion-based accommodations.

The Jaggi case is particularly illustrative. See Jaggi v. Police Dep’t, OATH Index No. 1498/03 (Apr. 28, 2004), aff’d, Comm'n Dec. (June 29, 2004). Through the decision, the New York City Commission on Human Rights forced the New York City Police Department (“NYPD”) to allow a Sikh to serve as a Traffic Enforcement Agent – Level II (“TEA”) with his turban. (TEA’s direct traffic and issue summonses.) The NYPD had denied Mr. Jaggi’s repeated requests for accommodation and had constructively discharged him when he began wearing his religiously-mandated turban to work instead of the required uniform white eight-point hat. The NYPD had also warned Mr. Jaggi that he would be required to trim his unshorn beard.

The NYPD argued that it could not accommodate Mr. Jaggi’s articles of faith because of two separate safety concerns, both of which the administrative law judge (“ALJ”) rejected. First, the NYPD argued that it had a safety interest in recognizability – that Mr. Jaggi would be unrecognizable as a TEA and member of the NYPD if he wore a turban instead of the uniform hat, therefore compromising his safety. The NYPD proffered evidence that racial epithets and assaults on TEA’s had decreased when TEA uniform colors were changed to navy, matching those of police officers and increasing TEA recognizability as members of the NYPD. The ALJ held, however, that although there may have been a causal link between the lowered assault rate

21 Available online at http://search.citylaw.org/isysquery/1108becb-02b0-41eb-9e1a-5c7b41bc0703/3/doc/ (last checked August 11, 2008).
and the color of the uniform, the NYPD had offered no evidence of a link between assaults and
the type of headwear worn by TEA’s. The NYPD’s assertion that the turban would pose a
greater safety risk as compared to the uniform eight-point hat was speculative, particularly given
that (a) Mr. Jaggi would wear the standard TEA uniform from the neck-down, and (b) TEA’s
wore a nondescript black hat in the winter but maintained their recognizability. In other words,
the ALJ believed that Mr. Jaggi would be as recognizable as a TEA with his turban as compared
to the uniform hat. Wearing his turban posed him no greater danger than he would have
otherwise faced.

The ALJ also rejected the NYPD second safety-based argument for denying Mr. Jaggi’s
request for accommodation. The NYPD argued that Mr. Jaggi would be unable to use a gasmask
or tactical escape hood in an emergency. The ALJ however accepted Mr. Jaggi’s testimony that
he would remove his turban (just as any TEA would need to remove his or her hat) and let his
long hair out of a bun (just as a female TEA may need to) in order to don emergency headwear.
The ALJ also rejected the NYPD’s contention that Mr. Jaggi’s beard may prevent a gas mask
from forming a proper seal, relying on a previous case before the Commission on Human Rights
which found no “evidence that a ‘flat twist’ of a Muslim correction officer’s beard to properly
wear a gasmask was unduly burdensome.” Id., citing Dep’t of Correction v. Shabazz, OATH
Index No. 111/03 (Aug. 21, 2003).22 Again, the ALJ believed that the NYPD’s safety objections
were speculative – or, at minimum, that the NYPD could not offer concrete evidence of actual
threats to safety because of Mr. Jaggi’s turban and beard.

22 Shabazz is available online at http://search.citylaw.org/isysquery/1c2035d8-7fce-4143-be4d-f1c867b9d07e/15/doc/ (last checked August 11, 2008).
C. Accommodation of Kirpans

Kirpans are easily the most misunderstood article of Sikh faith. Employers’ first reactions are often to ban them from the workplace. This reaction is consistent with that of local law enforcement. Since 2001, the Sikh Coalition has assisted Sikhs in twenty separate criminal cases in which the individuals were arrested or prosecuted for carrying what the local authorities mistakenly deemed a weapon under state or local criminal statutes. In all twenty cases, however, formal criminal charges against the individuals in question were dropped or dismissed because the prosecutors\(^\text{23}\) consistently came to understand that kirpans are not weapons in the conventional sense but instead are articles of faith. Moreover, of the three reported criminal cases that have been litigated regarding a kirpan in the United States, none has resulted in a conviction. Courts have consistently recognized that kirpans are articles of faith protected by the fundamental tenet of religious freedom upon which this country was founded.\(^\text{24}\)

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\(^\text{23}\) For example, Gerald J. Coyne, Deputy Attorney General for the State of Rhode Island wrote:

> During our review of the Sher Singh case, it was clear to us that Mr. Singh carried a kirpan only as a religious symbol, and had no intention of using the kirpan as a weapon. Thus, we advised the City of Providence that had brought the criminal against him, that this Department would not prosecute Mr. Singh if his case reached this office.

> We are hopeful that law enforcement agencies will recognize the inherent religious nature of a kirpan, and also recognize that those who carry a kirpan only as a symbol of faith should not be subjected to criminal prosecution.


\(^\text{24}\) In *People of the State of New York v. Partap Singh*, the Court dismissed prosecution of the criminal charges against a kirpan-wearing Sikh *sua sponte* in the interests of justice. 135 Misc. 2d 701, 706, 516 N.Y.S.2d 412 (N.Y.City Civ.Ct.,1987). In *State of Ohio v. Harjinder Singh*, the Ohio appellate court found “no evidence that [the defendant] possessed or carried the kirpan as a weapon and no evidence that the kirpan was designed or adapted for use as a weapon.” 690 N.E.2d 917, 920 (Ohio Ct. App. 1996). In *City of Detroit v. Sukhpreet Singh Garcha*, the court considered whether a local criminal law banning possession of a knife was applicable to the kirpan-carrying defendant. The court found that the law contained exceptions permitting good faith possession of knives which indicated “that the ordinance was intended to apply to persons carrying a knife as a weapon or for some unlawful purpose.” Slip op., No. Z-
As most non-Sikhs have never seen a kirpan, it may help to describe them in more detail. Kirpans are articles of faith often described as ceremonial knives or swords. There are no prescribed physical dimensions for a kirpan; therefore, they are left to the dictates of an individual Sikh’s religious conscience. Although there is no prescribed length, kirpans are often six to eight inches in length; about half of that length is usually representative of the hilt and the other half, the blade. The portion representative of a blade is often not sharp. Kirpans are normally kept in a tight sheath. Consistent with the Rehat Maryada (the Sikh Code of Conduct) the kirpan is to be worn using a gatra, a strap typically worn across the chest and over the shoulder that enables a kirpan to be suspended at one's waist or tucked inside one's belt. Sikhs often wear their kirpans underneath their shirts.

There are very few circumstances in which Sikhs’ kirpans have prevented them from doing their jobs, or have presented a hardship upon an employer. Nonetheless, employers sometime question whether a kirpan is a safe for a workplace or violates an anti-weapons policy. In these circumstances, the key question an employer should first ask is: Are there other objects in the workplace, as or more dangerous than a kirpan? Most workplaces are in fact replete with objects that are more dangerous than most kirpans. These objects include kitchen knives, sharp letter openers, heavy staplers, box cutters, swiss army knives, etc. Employers and employees normally don’t question the safety of these objects. A tightly sheathed kirpan is safer than most of them.

There are no published employment discrimination cases regarding kirpans. Nonetheless, the Sikh Coalition has assisted several Sikhs whose employers attempted to ban their kirpans from the workplace. One example is the 2007 case of Harcharan Singh Sandhu. Mr. Sandhu, an

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775606, *3 (36th Dist. Ct., City of Detroit); see City of Detroit Ordinance §38-10-42. Because “the Defendant was carrying the Kirpan ‘in good faith’” the court found the ordinance “inapplicable.”
initiated Sikh and IT consultant from India, was assigned by his employer (an Indian IT consulting company named Tech Mahindra) to provide consulting services for a branch of AT&T in Brecksville, OH. After starting the assignment, Mr. Sandhu voluntarily told both Tech Mahindra and AT&T that he carried a kirpan. After three months, AT&T decided that it could not allow Mr. Sandhu to carry his kirpan in its workplace. The company made the decision despite having never seen Mr. Sandhu’s kirpan (which he carried underneath his shirt) and despite the fact that he had worked in the Brecksville office without problem. Mr. Sandhu was given the following ultimatum: relinquish his religiously-mandated kirpan, or relinquish his assignment and return to India.

After Mr. Sandhu contacted the Sikh Coalition, the organization faxed a letter to AT&T which explained the significance of the kirpan and requested that the company reconsider its decision. The letter also explained that workplaces are often replete with objects that are more dangerous than most kirpans.

In response to the letter, AT&T informed Mr. Sandhu that its staff from the corporate security department would inspect his kirpan before making a final decision. Nonetheless, the company allowed Mr. Sandhu to continue working from the Brecksville, OH office pending its decision. A week later, a corporate security staff member from AT&T’s office in Columbus, OH viewed Mr. Sandhu’s kirpan and took pictures of it. The very next day, AT&T informed Tech Mahindra that it would reverse its initial decision and allow Mr. Sandhu to carry his kirpan in its workplace.
The EEOC has recognized the right of Sikhs to carry their kirpans in the workplace and, in the past year, has filed two kirpan-related employment discrimination lawsuits. In addition, the agency has included a hypothetical regarding a kirpan in its revised compliance manual (see EEOC Compl. Man’l., Ex. 39) and advises that “[i]f a security requirement has been unilaterally imposed by the employer and is not required by law or regulation, the employer will need to decide whether it would be an undue hardship to modify or eliminate the requirement to accommodate an employee who has a religious conflict.” Id. at 12-IV(B)(5).

V. Conclusion

In the face of a request for accommodation of a Sikh article of faith, an employer will minimize its liability if it critically examines whether the article in fact either prevents an employee from doing his/her job, or presents a special danger to the employee or workplace that would not otherwise exist. A critical analysis will, in most instances, reveal that a Sikh article of faith can be accommodated in the workplace, minimizing employer liability and promoting employee satisfaction and productivity.