

TURUN YLIOPISTON JULKAISUJA
ANNALES UNIVERSITATIS TURKUENSIS

SARJA - SER B. OSA - TOM. 355

HUMANIORA

CULTURAL DIVERSITY, SOCIAL COHESION, RELIGION

CORE VALUES AND EDUCATIONAL POLICIES
IN FOUR EUROPEAN NATIONS

by

TIMO HIMANEN

TURUN YLIOPISTO
UNIVERSITY OF TURKU
Turku 2012

Department of Comparative Religion
Faculty of Humanities
University of Turku
FIN-20014 Turku
Finland

Supervised by
Professor Veikko Anttonen
University of Turku

Docent Matti Kamppinen
University of Turku

Reviewed by
Professor Kim Knott
Lancaster University

Professor Tuula Sakaranaho
University of Helsinki

Opponent
Professor Kim Knott
Lancaster University

ISBN 978-951-29-5101-7 (PRINT)
ISBN 978-951-29-5102-4 (PDF)
ISSN 0082-6987
Uniprint - Turku, Finland 2012

Abstract

In my doctoral thesis I evaluate strategies designed to cope with the multicultural nature of four European nations: Great Britain, The Netherlands, Sweden, and Denmark. I also analyse and clarify the question of the place of religion in present-day Europe. The empirical material analysed in the study consists of politicians' statements and policy documents dealing with immigration policy and religious and values education in the four countries. In addition, I analyse statements issued by the Council of Europe regarding religious education, along with all cases relevant to religious education brought before the United Nations Human Rights Committee or the European Court of Human Rights.

The theoretical framework is formed by the scholarly debate – among philosophers, sociologists and scholars of religion in education – concerning the question of a just society. Special emphasis is given to philosophical theories that are in favour of granting special group rights to religious minorities in the name of equal treatment. With regard to the question of the appropriate place of religion, I apply Kim Knott's methodological model for locating religion in secular contexts, and Émile Durkheim's theory as to the significance of religion and collective sentiments in uniting adherents or members of a group into a single moral community.

The study shows that even when the positive side of immigration, as a potential force for the enrichment of the public culture, is acknowledged, there is anxiety as to the successful integration of immigrants. The premises and goals of immigration policies have also been questioned. One central problem is the incommensurability between the values upheld by Western liberal democracies and certain religious traditions, above all those of Islam. Great Britain, The Netherlands, Sweden, and Denmark have tightened control over their citizens' ethical attitudes and want to regulate these as well. In coping with cultural diversity, the significance of education, especially religious education, plays a significant role; as future citizens, pupils are expected to internalise the society's core values as well as gaining an understanding of different cultures and ways of life. It is also worth noting that both the Council of Europe and the European Court of Human Rights have recently expressed the view that one important goal of religious education is to enable pupils to be critical and autonomous with regard to different religions and moral positions.

The study shows that religion is not seen as purely a personal matter. Religion is closely linked to individual and national identity, and religious traditions thus have a place in the public domain. It should be noted, however, that a religious tradition – more precisely, an interpretation of religious tradition – qualifies as a legitimate partner in the democratic decision-making process only if it shares similar values with Western European nations.

Key words: religion, multicultural society, cultural diversity, plurality, liberalism, core values, social cohesion, religious education, values education, liberalism, assimilation, sacred, Great Britain, the Netherlands, Sweden, Denmark, Council of Europe, European Court of Human Rights.

Acknowledgements

Except for a short time in Umbria, Italy, this thesis has been written sitting in front of a tiny laptop in a tiny study in our home. Most of the time I have worked alone. Without financial support and the help of a number of people, however, the work would never have been completed.

The research was funded by Suomen Kulttuurirahasto (Varsinais-Suomen rahasto) and TOP-säätiö.

My two advisers were Professor Veikko Anttonen and Docent Matti Kamppinen. I am very grateful to both of them for their help and guidance. It was Veikko who first suggested to me that I might start doing a doctoral thesis at the Department of Comparative Religion at the University of Turku. Veikko's insights and his knowledge about research in the field of religion were vital. Matti Kamppinen took part in the project at short notice, but was the first to comment on the first draft of the thesis.

I also want to thank my two external assessors, Professor Kim Knott of the Lancaster University and Professor Tuula Sakaranaho of the University of Helsinki, for comments and suggestions that helped me to make this thesis better.

A large part of the material analysed in this thesis was in Dutch, Swedish or Danish, making it necessary to use the help of translators. I want to thank Minna Komulainen and Johan Roth for translating texts from Danish and Swedish into Finnish and English, and Raimond Bertram for translating some Dutch text passages into English.

I have received help from Riikka Kaipainen in correcting my English. Riikka was available whenever I needed help. At the very end of the project I had the honour to receive help from Ellen Valle, who further improved my English and made the text more readable, simultaneously offering insightful comments.

My whole family has supported me throughout the four-year process of completing this thesis. I am deeply grateful to my parents for their constant help and encouragement. I also wish to thank Silvia and Eino, my two effortlessly wonderful children, for showing me what is worthwhile in difficult times when the work has not proceeded as planned. My greatest gratitude goes to my wife Päivi. I am grateful for having her in my life, for giving me purpose and direction. I dedicate this work to Päivi.

Turku 2012

Timo Himanen

Contents

Chapter 1: Introduction	1
Framing the research problems	1
Main goals of the study	4
Religion in education as a highly topical issue	5
Selection of the countries for the analysis – Great Britain, the Netherlands, Sweden, and Denmark	7
The context of the study	13
<i>The Council of Europe and the European Union aiming for stronger uniformity</i>	13
<i>Religious landscape of Western Europe</i>	15
<i>The place of religion in Europe?</i>	17
<i>Cultural plurality</i>	20
Research strategy	23
Theoretical background	31
Key concepts	33
'Culture'	33
<i>Religious groups as cultural communities</i>	34
<i>Religious education</i>	35
Previous research on the topic	36
Significance of the thesis	37
Outline of the thesis	38
Chapter 2: Articulating national and regional identity	40
Framing the research problems	40
Great Britain and the (re)production of national identity between 1997-2007	44
The Netherlands	50
<i>Rearticulating identity by polarising Dutch and Islamic values</i>	51
<i>Some aspects of the polarisation between Dutch and Islamic values and practices</i>	52
<i>Articulation of national identity in public debate and policy documents</i> ..	54
Sweden	57
Denmark	61
Discussion	64
Identity at the regional level: articulation of European identity by the Council of Europe and the European Union	68
<i>The Council of Europe building the identity of Europe</i>	69
<i>The European Union</i>	72
Concluding remarks	73
Chapter 3: Dealing with cultural diversity	75
Introduction	75

Essential concepts.....	76
<i>Multiculturalism</i>	76
<i>Assimilation and acculturation</i>	78
Philosophical debate on group rights.....	79
<i>Kymlicka and cultural membership as a primary good</i>	82
<i>Charles Taylor on recognition, equality and cultural survival</i>	83
<i>Difference between Kymlicka and Taylor</i>	86
<i>The question about religions' protected cultural survival</i>	88
<i>Yael Tamir's right based liberalism and respect for decent (religious)</i> <i>cultures</i>	89
<i>Kenneth Strike and context sensitive balance</i>	90
Minority claims in numbers.....	90
Problematic group rights	92
Theoretical framework for the analysis of empirical data	94
<i>Models for analysing multicultural polices</i>	94
<i>Relevant questions for the analysis of empirical data</i>	98
Coping with cultural plurality in Britain, the Netherlands, Sweden and Denmark	99
Great Britain	99
The Netherlands.....	106
Sweden.....	110
Denmark	116
Summary and discussion	118
Chapter 4: Social cohesion and education	124
Introduction	124
Great Britain	126
<i>History of educational arrangements</i>	126
<i>Faith schools</i>	127
<i>Government policy, political atmosphere and recent developments</i>	128
The Netherlands.....	133
<i>History of educational arrangements</i>	133
<i>Faith schools</i>	134
<i>Political atmosphere</i>	134
<i>Recent development</i>	136
Sweden.....	136
<i>History of educational arrangements</i>	136
<i>Faith schools</i>	138
<i>Recent development</i>	138
Denmark	141
<i>History of educational arrangements and faith schools</i>	141
<i>Recent development</i>	141
The Council of Europe and the need to promote intercultural education....	143
How does the curriculum reflect the need to achieve cohesion?.....	144
<i>Great Britain</i>	145

<i>The Netherlands</i>	145
<i>Sweden</i>	147
<i>Denmark</i>	148
Summary and discussion	148
Chapter 5: Values education	152
Introduction	152
Great Britain	157
<i>Explicitly stated values</i>	157
<i>Desirable ethical attitude</i>	159
<i>Means and content of ethical reflection</i>	160
The Netherlands	164
<i>Explicitly stated values and desirable ethical attitude</i>	165
<i>Ethical reflection</i>	167
Sweden	168
<i>Explicitly stated values</i>	168
<i>Desirable ethical attitude</i>	170
<i>Means and content of ethical reflection</i>	172
Denmark	173
<i>Explicitly stated values</i>	173
<i>Desirable ethical attitude</i>	174
<i>Means and content of ethical reflection</i>	177
Summary and discussion	177
Chapter 6: Religious education in a multicultural society	182
Introduction	182
United Nations and the Council of Europe: human rights in relation to the content of religious education	185
Application of the principles of human rights to legal issues	188
<i>United Nation's Human Rights Committee</i>	188
<i>European Court of Human Rights setting criteria for appropriate content of religious and values education</i>	190
Appropriate content and organisation of religious education seen by the eyes of United Nations and the Council of Europe	194
Concluding remarks	202
Chapter 7: Summary and discussion	206
Main conclusions revisited	206
Summary and discussion on the 'appropriate' place of religion	215
Bibliography	219
Primary sources	219
Literature	231

Chapter 1

Introduction

Framing the research problems

Since the 1960s, many European nation-states have experienced large-scale immigration (see e.g. Boswell 2005, 2).¹ Immigration has made these societies more plural, in the sense that along with the majority culture they now include representatives of different religions and ethnic groups, whose presence is furthermore more visible than ever before.² The flow of people of various origins has “changed cultural landscapes and turned ethnically more or less homogeneous nation-states, some more and some less, into multiethnic and multicultural societies” (Anttonen 2005, 95). In addition, almost all multicultural societies contain large diasporic communities “that are held together less by secular ties of citizenship than by a shared religious culture” (Turner 2011, viii). The diversity of comprehensive religious, philosophical and moral doctrines is expected to be a permanent feature of Western nation-states (see e.g. Rawls 1993, xvi-xvii).

With regard to their treatment of their citizens³, European democracies are committed to two basic liberal principles: respect for both the freedom and the equality of every individual. It is also the duty of the state to ensure

¹ All European states are net immigration countries. In countries such as France, Germany, Great Britain, the Benelux countries, Austria, Switzerland, Sweden and Denmark, this has been the case since at least the 1960s (Boswell 2005, 2). Statistics published by Eurostat (2010, 189) show that in 2008 the population of EU-27 countries grew by 2.1 million inhabitants, with the majority of this increase – more than seven out of ten persons (72 %) – composed of migrants. The most significant numbers of third-country nationals residing in the EU are citizens of Turkey, Morocco, Albania and China (ibid, 192).

² I use the terms ‘majority’ and ‘minority’ as sociological terms, referring to the number of inhabitants within a particular nation-state. I use the terms ‘plurality’ and ‘diversity’ synonymously. For example Jackson (2007; 2004a) uses these terms in this manner. In the documents that I analyse, especially those from Great Britain, ‘diversity’ is used more often; that is why I chose to apply this term in the title of this thesis. The terms ‘cultural diversity’ and ‘cultural plurality’ refer to the fact that in multicultural societies different religions, customs and value systems are represented.

³ In this thesis, the term ‘citizen’ is used for the sake of simplicity to refer to all those persons permanently or quasi-permanently resident in a country, whether or not they are legally citizens of that state.

that free and equal citizens are able to govern cooperatively, while at the same time each individual can also promote those ends that he or she sees as valuable. However, harmony among citizens in culturally plural societies is put to the test because opinions as to what constitutes a good life, about right and wrong, vary greatly. There are tensions among the adherents of various faiths, ideologies, lifestyles and practices (see e.g. Thorseth 1999, 11).⁴

The incommensurability of different modes of living has been an integral part of the debate over immigration and the success of various European governments' immigration policies.⁵ An illuminating example of this is Paul Scheffer's column 'Multicultural drama' (Het multiculturele drama) (2000) in the Netherlands' leading newspaper *NRC Handelsblad*, in which he argued that the Dutch immigration policy has failed. According to Scheffer, the same kind of peaceful reconciliation between denominational groups that has taken place between Catholics and Protestants, even though these groups were once deeply divided, has not succeeded with certain immigrant groups. He argued that immigrants do not feel attached to Dutch culture and society, and are unwilling to integrate into the society and adopt its norms. (Enzinger 2006, 128.) Criticism questioning the success of a nation's immigration policy can also be found in other European countries that have been open to large-scale immigration (Boswell 2005, 5).⁶

Many of the tensions among citizens are related in particular to religion (Turner 2011; Casanova 2009). There are for example religious groups that want to live by ideals that according to them cannot be questioned; in other words, their ideals are treated as sacred, infallible, or beyond critical argument. It is obvious that members of these groups want to raise their children to respect their own practices and norms. (See e.g. Galston 1995; Halstead 1995; Tamir 1995.) On the other hand, the majority of citizens do not consider certain practices legitimate: for example placing autocratic constraints on individuals, maintaining gender inequality, or keeping children ignorant or giving them a distorted picture of other ways of life. And it is specifically Islamic beliefs and practices that have recently been singled out as incompatible with liberal democratic and human-rights standards in European countries. In particular right-wing populists have been openly critical or even hostile to Muslims in Europe. (Boswell 2005, 10.)

Empirical research has confirmed that religion is widely seen as one important source of conflict among citizens. For example, in his article 'The Religious Situation in Europe', José Casanova (2009, 223-224) writes that "[t]he overwhelming majority, practically over two thirds of the population in

⁴ It should be noted that difference as such is not a source of conflict (see e.g. Barry 2001, 24). I return to tensions among citizens several times in this thesis.

⁵ The term 'immigration policy' refers here to practical solutions for the incorporation of migrant populations into the society. In Chapters 2 and 3 I give a detailed picture of the ways in which immigration has proved problematic.

⁶ I return to this topic in Chapters 2 and 3.

every Western European country, agrees that religion is ‘intolerant’, and a majority in every Western European country, except Norway and Sweden, shares the view that ‘religion creates conflict’.⁷

The terrorist attacks of September 11 2001 marked a sea change in how the presence of religions is perceived by the public and the media. For example, according to Loraine Sheridan’s (2002) study in Britain after 9/11, Muslims, Sikhs and Hindus have reported increased experiences of implicit racism. The greatest increase was reported by Muslims. An interesting finding in the same study was that at the same time Christians and Jews reported a decline in experiences of implicit racism. Sheridan (2002) sums up her findings:

Overall, results would suggest that significant world events do impact on racial and religious prejudice and on discriminatory actions, and that religion is more important than ethnicity in indicating which groups are most likely to experience racism and discrimination post-September 11th. ... Religion appeared to trigger both implicit racism and general discrimination to a greater extent than did race or ethnicity.

Perhaps it is an exaggeration to speak of a ‘moral panic’⁸ that Europe is currently facing, but it does seem that tolerance, the foundational value of liberalism, “has declined significantly in many European countries” (Turner 2011, 169). In his book *Religion and Modern Society* (2011), Bryan S. Turner writes that in a globalising context divisions between religions have increased rather than diminished, and that “there is a danger that multicultural societies will become enclave societies” (Turner 2011, 174). In this sense religious diversity is a serious political problem (Turner 2011, 175), and one which has been recognised by the governments of European countries and by regional actors such as the Council of Europe.⁹ Various programmes have been launched in order to make things better. It is this challenge that has served as motivation for the present study. What is needed to make things better? What

⁷ However, as Barry (2001, 24) points out “there is nothing inherent in the phenomenon of religion as such that inevitably leads to conflict between adherents of different deities, cults or sects.”

⁸ For example Ellie Vasta (2007, 713) argues that “[r]ecently in numerous European countries of immigration, there has been a widespread ‘moral panic’ about immigrants and ethnic diversity.”

⁹ The Council is an inter-governmental organisation, founded in 1949. It currently comprises 47 member states; its aims include protecting human rights, pluralist democracy and the rule of law as well as seeking solutions to problems such as discrimination against minorities, xenophobia and intolerance.

The Council of Europe’s most famous achievement is the European Convention on Human Rights, adopted in 1950 following a report by the Council of Europe’s Parliamentary Assembly. The Convention created the European Court of Human Rights in Strasbourg. (Council of Europe 2011a.)

is actually being done to make things better?

With regard to these questions, there is an important dimension to be taken into account. In 2001 the Council of Europe's Committee of Ministers¹⁰ issued a recommendation to its (then) 43 member states:

[w]here religious pluralism gives rise to religious divisions, with attendant tensions, the public authorities' response should not be to eliminate religious pluralism, but to strive to ensure that the various groups respect each other. ... On this basis, the Committee concurs with the Assembly that member states have a responsibility to ensure conditions conducive to the preservation of harmonious relations between religions and between the latter and other sectors of civil society. They must also ensure, respecting the principle of equality before the law, that different religions can coexist and develop peacefully. (Council of Europe 2001.)

The core of the above quotation is that, while there is a need to create conditions that enable the construction of harmonious relationships and mutual respect among citizens, this should be done in such a way that plurality is meaningfully maintained; or, to put it in other words, that no life choices are discriminated against. This gives rise to a further question: How do different nations currently promote peaceful co-existence in such a way that equality among citizens is (maximally) ensured?

Main goals of the study

For the purposes of my enquiry, I have selected four nations – Great Britain, the Netherlands, Sweden, and Denmark – that have been open to large-scale immigration of people who differ – ethnically, culturally and very often religiously – from the majority of the society.¹¹ In addition, I examine the Council of Europe, which as a regional actor aims at influencing its member nations.

I have five general aims in this study:

- (i) to present and analyse the strategies these countries have used and are currently using in dealing with cultural and religious diversity;¹²

¹⁰ The Committee of Ministers is the Council of Europe's decision-making body. It consists of the Foreign Affairs Ministers of all the member states, or their permanent diplomatic representatives in Strasbourg. (Council of Europe 2011b.)

¹¹ I use this order systematically throughout this thesis. Later in this chapter I discuss why I have selected these particular countries and discuss their similarities and differences in the light of my interests in this thesis.

¹² Turner (2011, 175) writes that all multicultural societies are "by definition multi-faith societies"; thus "any policy relating to multiculturalism is automatically a policy about religion".

- (ii) more specifically, to see what kinds of changes have been suggested and/or made in these countries' educational systems, in order to achieve a more tolerant and harmonious society;
- (iii) to explore the content and aims of ethical and values education;
- (iv) to compare different strategies adopted by these countries;
- (v) finally, with regard to the actions of the Council of Europe, I explore its perception of the role of education, in particular religious education, as a means of making Europe a more tolerant region.

Since the starting premise in this study is that one source of conflict among citizens in a multicultural society is the presence of religions, I focus on the question of what is regarded as the 'appropriate' place of religion in contemporary Europe. With regard to this question, I explore the following issues:

- (vi) to what extent space is allotted for religion in the state and its public affairs (particularly in the field of education);
- (vii) what expectations and responsibilities are placed on citizens in general and religious citizens in particular;
- (viii) how the domain of the 'secular' is preserved from the impact of the domain of the 'religious'.

Below I explain my choices with regard to research questions, discuss the context of the research, and describe my detailed research strategy.

Religion in education as a highly topical issue

An analysis of educational arrangements that deal with the multi-religious nature of a society is of importance for (at least) three reasons. First of all, as Robert Jackson (2004a, 4) points out, political debates about religion in education reflect "wider controversies about national and transnational identity, ethnic identity, the perpetuation of culture and values". Solutions and suggestions as to how to make education respond better to the challenge of cultural plurality are an important part of governments' overall policy of dealing with difference. According to Jackson, such questions as 'What should be the aims and methods of religious education?' and 'Ought children from different religious and non-religious backgrounds be taught together in the same schools, or should children from families with a particular religious background be taught in separate faith-based schools?' are of importance to all Western democracies. It is important to note, as I show in this thesis, that there is a widespread controversy as to the right solutions to these questions.

Secondly, issues relating to religion in education are topical because in recent years there has been increased international interest with regard to this matter. Jackson (2004a, 159) points out that since "[r]eligion is a very evident

factor in international relations and in the process of globalization”, its educational provision cannot be viewed in isolation, as solely a matter of a nation’s own choice.

Thirdly, as it is the case that all nations have the implicit goal, at least to a certain degree, of overcoming diversity and standardising their citizens (Anttonen 1996, 69; Robertson 1990, 49), education is an important institution in producing ‘suitable’ and in some respects identical future citizens. Religious education plays an important role in this process, since it is often charged with the responsibility for transmitting the society’s core values. As Sakaranaho (2006, 315) writes, “[i]t is not an exaggeration to say that religious education, in particular, is one of the last bastions of national norms and values, which a society is adamant to transfer from one generation to other”. My interest in this matter derives from the fact that many immigrant parents

experience a contradiction between the values and the world views of the school and home. The parents generally agree with the so-called *instrumental culture* of formal education, consisting of ‘skills, competences and social behaviours that are required to successfully make a living and contribute to society’ (Suárez-Orozco & Suárez-Orozco 2001: 156). However, the problem lies in the *expressive culture* of schools, pertaining to ‘the realm of values, worldviews and patterning of interpersonal relations that give meaning and sustain the sense of self’ (Suárez-Orozco & Suárez-Orozco 2001: 156), which is seen to contradict the expressive culture at home. (Sakaranaho 2006, 316; italics in original.)

It is Muslims in particular who are afraid of losing their children to the dominant culture, and who believe that the ‘neutral’ knowledge given children in schools is expected “to accomplish a kind of brain-washing intended to discredit Islam” (Maréchal 2003, 33).

It is interesting to explore in what respects the needs of the parents are taken into account, and how nations’ own interests with regard to values and moral education are interpreted. Throughout history, parents have had almost unconditional authority over their under-age children with regard to moral education or passing on their own life values and beliefs. As Barry (2001, 205) writes, “it is assumed without question that parents are at liberty to enroll their children in their own faith and subject them to its teachings”. At least three reasons for this can be given. First of all, in order to retain neutrality and respect parents’ freedom of conscience and association, the state must avoid taking sides in matters of religion. Children adopt a certain religious way of life by participating in their parents’ daily activities. In fact, it is inevitable that parental practices relating to religious faith will have an impact on their children.

Secondly, it is in the children's interest as well that their parents can initiate them into their way of life. Since children are dependent upon their parents, the latter are justified in giving their children a stable and coherent primary culture. The religious traditions to which parents are committed involve a range of social practices, attitudes, rituals etc. that children adopt and learn to see as legitimate.

Thirdly, it is in children's interest to have a coherent belief system as a starting point for their moral development. Richard Shweder (1991; cited in Feinberg 1995, 212), writes that "children's emerging moral understandings are the product of continuous participation in social practices (the mundane rituals of everyday lives), and those socially produced and reproduced understandings are the grounding for later attempts reflexively or self-consciously to reconstruct their own moral code."

Similarly, Gerald Dworkin (1988, 37) argues that

[m]oral reform takes place against a background of accepted understandings about our moral relationships with one another. And these are not invented. Moral reforms (almost?) always take the form of attacking inconsistencies in the accepted moral framework, refusals to extend rights and privileges that are seen as legitimate already.

Thus it could be argued that a parent also has the right for example to shield the child from a group of adults "ringing the door simultaneously, each demanding the right to provide different moral vocabularies and environments within which the child may understand his resistance to his primary culture" (Ackerman 1980, 150).

The question of the rights of a parent in moral and values education in a culturally plural society has been widely discussed among scholars of political philosophy and religious education. In Chapters 4 and 5 I present the main arguments concerning this topic and explore how the matter is resolved in Great Britain, the Netherlands, Sweden and Denmark.

Selection of the countries for the analysis: Great Britain, the Netherlands, Sweden, and Denmark

For my enquiry I have selected four European nations: Great Britain, the Netherlands, Sweden, and Denmark. These four countries have been open to the large-scale immigration of people who differ ethnically, culturally, and religiously from the majority of the society.¹³ I ended up with these countries

¹³ I give relevant information about the history of immigration in these four countries in Chapter 2. As background information, the following statistical information is relevant: in Great Britain in 2008 the non-white population (mixed, Asian, Chinese, Black, other) was around 9% of all inhabitants (Somerville et al. 2009). In terms of religious adherence,

for several reasons. First of all, I wanted to analyse and compare European nations that have experienced particularly high levels of immigration since the 1990s. In addition to these four nations, five others – Austria, France, Germany, Norway and Switzerland – have also received vast numbers of immigrants in the past two decades (see e.g. Boswell 2005, 2). Secondly, I wanted to include nations that have not only applied different strategies in dealing with cultural diversity and immigration over the past four decades, but also differ in the ways religious education is currently organised.¹⁴

Thirdly, as a scholar from Finland, I wanted to place special emphasis on the Nordic countries. This is due in particular to the fact that (as yet at least) Finland has far fewer immigrants, especially from non-Western countries, than Sweden, Denmark or Norway (Sisäasiainministeriö 2011, 3);¹⁵ religious education is likewise organised differently from these countries. The two issues are interconnected; if the number of immigrants should rise, as it is expected to, this would exert pressure to change the existing system of providing religious education (see Kallioniemi 2007). Although in Finland, as in Sweden, Denmark and Norway, the state is responsible for the organisation of religious education and the subject is taught non-confessionally, the main difference is that in Finland pupils attend different RE classes according to the family's religious affiliation (Luodeslampi 2007); in Sweden, Denmark and Norway, in contrast, all pupils attend the same RE classes (Larsson 2007; Monrad 2007; Leganger-Krogstad 2007). In other words, in Sweden, Denmark and Norway all pupils receive a similar RE content. If the number of adherents of different religions should rise in Finland, however, this would not only make the current system difficult to implement in practice but also would raise questions as to the aims and methods of religious education (Kallioniemi 2007, 110). It is worth noting that the question of how RE should be organised is the subject of constant debate in Finland, both among the general public and among scholars of religious studies (see e.g. Komulainen 2012; Kamppinen 2005). For future approaches to RE in Finland, it is thus important to evaluate different alternatives in a wider context.

almost 72% were Christian while 2.7% were Muslims (Lankshear 2007, 217). In the Netherlands in 2008 the non-white population was around 13% (Migration Policy Institute 2011). Christians formed 27% and Muslims 6% of the total population (Kuyk 2007, 135). In Sweden 80% of the population are Christians and 2% Muslims (Larsson 2007, 193). In Denmark around 81% of all citizens are members of the Danish National Church [Lutheran] and 3% are Muslims (Monrad 2007, 49).

¹⁴ See e.g. Janoski's & Hicks's (1994, 8-9) model of a comparative research project. The second phase of the research, the method of difference, "is the selection of countries that have similar features on some variables but are different on other critical variables" (ibid, 15).

¹⁵ In 2010 in Finland approximately 3% of all population were foreigners; 65% of these were from European countries (Sisäasiainministeriö 2011, 3).

As noted above, apart from the Nordic countries, along with Great Britain and the Netherlands four other countries – Austria, France, Germany, and Switzerland – have also received significant number of immigrants over the past two decades. France was automatically deselected from this research because there is no place for religious education in state-maintained schools (Schreiner 2007a, 10). In considering which two of the remaining five countries to choose I found that both the Netherlands' history of dealing with diversity in during the past century and its immigration policy over the past several decades differed fundamentally from those of the others. First of all, from the last quarter of the nineteenth century down to the late 1970s the Netherlands has had a unique institutional arrangement, known as 'pillarization' (*verzuiling*), according to which the population was "divided into different social segments on the basis of their moral and/or religious views" (Spiecker and Steutel 2001, 294).¹⁶ Secondly, its official immigration policy in the 1980s was based on a strategy according to which immigrants were defined by their collective identities (see e.g. Soysal 1994, 46).

Of the rest of the countries, I ended up with Great Britain because, in contrast to the Netherlands, its policy of dealing with immigration has been more individual-oriented and decentralised (Soysal 1994, 52). More importantly, Britain's provision of RE is closer to realistic future scenarios for Finland than those of Austria, Germany or Switzerland. In Britain, within the state maintained system, the subject is centrally regulated, non-confessional and uniform, in the sense that all students attend the same classes, while the system of providing RE and its content in the other three countries is not centrally regulated and contains both confessional and non-confessional approaches (Kallioniemi 2007, 105-108; Kilchsperger 2007; Lankshear 2007; Pollitt 2007; Schreiner 2007b).¹⁷

Of the Nordic countries, I ended up with Sweden and Denmark. Sweden was an obvious choice because its earliest official immigration policy was based on a strategy in which immigrants were defined by their collective identities. (See e.g. Soysal 1994, 46.) This took place a decade before the Netherlands. No other Nordic country has had a similar arrangement. I chose Denmark rather than Norway because Norwegian scholars have already provided analyses of Norway's educational choices in response to concerns over disintegration. For example Geir Skeie (2006a, 22) argues that Norway

¹⁶ It is worth noting that this arrangement accommodated mainly Protestants and Catholics. I return to this Dutch arrangement in Chapter 2.

¹⁷ Germany is divided into sixteen states (*Länder*), without any standard model of educational provision that an individual state is required to follow (Schreiner 2007b, 82). In Austria RE is confessional subject in which "[t]he confession of the students, of the RE-teacher and of the type of RE has to correspond" (Pollitt 2007, 18-19). In Switzerland RE is taught in many different ways, under many different names and with different providers. A given system may include both confessional and non-confessional approaches. (Kilchsperger 2007, 200-201.)

has emphasised “a ‘cultural’ and ecumenical version of Christianity, used as a kind of ‘civil religion’”, while Bjørg Gundem and Berit Karseth (1998, 10) write that Norway is relying “on a monocultural identity of a society”.

To sum up the historical differences among these four nations, before outlining their differences with respect to religious education: First, we can note that as old colonial powers Great Britain and the Netherlands have long been in contact with different customs and religions (see e.g. Davie 2006, 31; Spiecker and Steutel 2001, 294). Sweden and Denmark, in contrast, have been distinctively homogeneous nations, at least from the religious point of view; they have both had very powerful Evangelical-Lutheran traditions. Lutheranism became the official religion in the sixteenth century, and down to the late eighteenth century it was the only legal religion. After religious emancipation, Roman Catholicism, the Reformed Church, and Judaism were allowed to function in society. Until the recent immigration from non-Western countries, these three denominations were practically the only non-Lutheran religions practiced in Sweden and Denmark.

More importantly, there are significant differences in the policies these nations have applied in dealing with cultural plurality and immigration over recent decades. As mentioned, in the 1970s in Sweden and the 1980s in the Netherlands the official immigration policy was based on a strategy whereby immigrants were defined by their collective identities. The policy discourses in both countries’ referred to ‘ethnic minorities’ (Soysal 1994, 46). Britain and Denmark, on the other hand, have had no such arrangement; in other words, immigrants have not been regarded in terms of their collective standing but as individuals (Soysal 1994, 52). With regard to these differences, my interest in comparing these countries departs from Yasemin N. Soysal’s idea, formulated in her book *Limits of Citizenship: Migrants and Postnational Membership* (1994), that the framework of national citizenship has been replaced with a more universal model, known as ‘postnational citizenship’. Soysal (1994, 3; 136-140) argues that the ‘narrative’ of nationhood has increasingly been replaced by a ‘narrative’ of human rights in political discourse on individual rights. The point is that rights are no longer linked to national or cultural identity but to humanity; in other words, to the fact that one is a human being. Thus we can ask whether the case is similar in policies dealing with cultural difference, and if so, what this means in practice.

With regard to differences between Great Britain, the Netherlands, Sweden and Denmark in their past and present organisation of religious education, there are a few points to be taken into account.¹⁸ In England

¹⁸ In Great Britain each individual ‘country’ or part, i.e. England, Wales and Scotland, has its own educational system under separate government. In this thesis I focus on the educational arrangements prevalent in England.

religious education has been a compulsory subject within the state-maintained system since 1944. In 1943 the Board of Education presented a White Paper entitled 'Educational Reconstruction', suggesting that religious education should be given a greater place in schools as a means of reviving the spiritual and personal values of society.¹⁹ While the subject was compulsory, a 'conscience clause' in the legislation gave parents the option to withdraw their children from religious worship or education. (Louden 2004, 276.)

For the first few decades after 1944 Christianity held a privileged position in the syllabus (Kay 2000, 12-14), but from the 1970s onward other religions began to establish a stable place in the National Curriculum for state-funded schools. Their representatives also have had the possibility of participating in Agreed Syllabus Conferences. (Miedena 2007, 275.)

In 1988 the new Education Act further strengthened the place of religion in schools. The name of the subject was changed from 'Religious Instruction' to 'Religious Education'. (Lankshear 2007, 218-220.) In an article entitled 'Religious Education in England and Wales', David W. Lankshear (2007, 220) writes that "students experiencing the programme will be enabled to become well informed members of multi-faith and multi-cultural society who are able to respect the views, practices and beliefs of others." This quotation quite clearly reflects the idea that RE has an important function in a culturally plural society. It is worth mentioning that parents have the right to opt their children out of the subject without giving any reason for their choice (Lankshear 2007, 219).

The organisation of RE of the Netherlands differs significantly from Great Britain, Sweden and Denmark in two ways. First of all, until 1985 the state did not have any responsibility for the organisation of religious education. Schools had, and still have, the possibility of asking churches or other religious groups to provide RE on a voluntary basis, for those children who want to attend these lessons. In many schools religious education has had a confessional character, but more recently the approach has shifted towards a more multicultural and inter-religious approach. (Kuyk 2007, 136-137.)

In 1985 the government decided that a new and obligatory subject, under the name of 'Religious and Ideological Movements', should be introduced in the curriculum of all primary schools, whether state or private. The government wanted pupils to gain some knowledge of the main belief systems of the world religions: their beliefs, practices, norms and values. This was seen as a precondition for adequate participation as citizens in a pluralistic Dutch society. (Kuyk 2007, 136; Miedena 2007, 272-276.) The

¹⁹ Such a proposal serves as a prime example of the kind of religious education that tries to achieve harmony through transmitting a specific Christian ethos to all pupils.

new subject, however, did not need the formal status of an independent subject, and was often integrated into other subjects.

A second difference is that prior to 2003 the Dutch Educational Inspectorate did not spell out any guidelines as to how to teach religion, and the schools have had great freedom in deciding the actual content and approach. Since 2003, the content and implementation of RE have been under stricter control by the authorities, but there are still no centrally dictated curricula or syllabi for the subject. (Miedena 2007, 276.) The subject is not compulsory; rather, pupils are guaranteed the possibility of attending RE classes if they so wish. (Kuyk 2007, 137.)

Of the four countries, the Swedish system is most centrally regulated and has the longest tradition – dating from the late 1960s – of providing a separate, non-confessional subject. The subject, *Knowledge of Religion* (*Religionskunskap*) is taught in all primary and secondary schools, with syllabi provided by the Swedish National Agency for Education. The subject is obligatory for all pupils.²⁰ Furthermore, private schools also are subject to the same legal requirements regarding RE curricula and syllabi. In faith-based private schools this special religious character has to be expressed in other areas of school life.

In terms of content, the focus of RE in Sweden is on questions concerning the life (life questions), ethics, beliefs and tradition. The content clearly reflects the goals and interests of society, along with the personal development of the individual student. According to Rune Larsson (2007, 196), "RE is seen as a resource for the children to broaden and deepen their experience and thinking, to train their ability for critical reflection on existential, religious, and ethical questions and develop their competence as reasonable citizens." Thus, similarly to England, religious education is considered to play an important role in creating future citizens.

In Denmark the public schools (*Folkeskole*)²¹ have shared responsibility for 'Christian nurture' with the Church of Denmark. Since 1975 the school system has had the responsibility for passing on knowledge and enabling cultural individualisation. The subject, under the name of *Knowledge about Christianity* (*Kristendomskundskab*), is non-confessional, with an academic approach aimed at passing on information about Christianity as well as other religions. (Monrad 2007, 49-51.) The Danish Ministry of Education provides guidelines as to the purpose of different subjects and sets short- and long-term goals. The difference compared to Sweden is that the curriculum is established by individual schools and has to be accepted by the municipal council. The content consists of four 'central areas and skills'. These include

²⁰ Until 1997 the Education Act gave the pupils or the parents a limited right to opt out of RE. In 1997 this right was withdrawn. (Larsson 2007, 194.)

²¹ 'Public school' in the American sense, not the British one. The literal meaning is 'school of the people'.

non-Christian religions and other life philosophies/ethics. However, especially in the case of younger pupils the main emphasis is on Christianity. Similarly to England, and unlike Sweden, the subject has an exemption clause: by the parental request a pupil can be exempted from attending the subject. (Monrad 2007, 51-52.)

To sum up: in relation to the research questions of this thesis, the similarities and differences described above provide an interesting starting point for the exploration and comparison of these four countries. Since the motivational background of the study is derived from the evident difficulty of peaceful co-existence among citizens in culturally plural societies, my main focus will be on general solutions and patterns designed to promote unity among members of a given society.

The context of the study

The Council of Europe and the European Union aiming for stronger uniformity

With regard to the regional context of the research, two points need to be made. The first is the explicit aim of achieving a certain uniformity within plurality in Europe. The second concerns the definition of European identity and its relation to the recognition of 'others', i.e. of those who have come to live in Europe from non-Western countries. The two points are closely connected.

All Western European countries are members of the Council of Europe, which is committed to protecting the principles of human rights, pluralist democracy, and the rule of law. In the Council these "fundamental values" are regarded as "the foundations of a tolerant and civilized society and indispensable for European stability, economic growth and social cohesion." (Council of Europe 2011a.)

The aim of uniformity is also characteristic of the European Union, whose member states have taken steps towards integration at the political, economic and cultural level (Anttonen 2005, 96). It is worth noting that for a long time the real goals of European integration were not actively discussed, since the process was mainly seen as a functional development (Mikkeli 1998). Commonly agreed values have nevertheless been seen as essential building blocks in the process of building a 'new Europe' (Laffan 1996, 83).

In the past two decades, there has also been interest within the European Union in bringing about greater uniformity among the member states in terms of immigrant integration. According to Maria Teresa Bia (2004, 6), the European Union did not originally have any rule aimed at promoting supranational authority in matters of immigration and asylum policy. It was the achievement of the free movement of persons within the European Single Market in 1993, together with the increase in migration, that "raised the need

for a common EU policy to complement national policies, which were proving inadequate to deal efficiently with immigration in an area without borders.” In 1999 the member states agreed, in the Tampere European Council Conclusions, on the need for more vigorous integration policies that would ensure the fair treatment of immigrants from outside the EU who were legally living in an EU country (Niessen & Huddleston 2009, 15).

It was not until 2004 that the European Council produced a document, entitled ‘Common Basic Principles for Immigrant Integration Policy in the European Union’. This document states that immigrant integration is “a dynamic, long-term, and continuous two-way process of mutual accommodation, not a static outcome” (Council of European Union 2004, par 1). It is also seen as necessary that local residents should be in frequent and meaningful interaction (Council of European Union 2004, par 7). An important target of the policy is to prevent the isolation of immigrant groups (Council of European Union 2004, par 2).

In 2007 the EU’s vision for future immigration policy was presented within the Commission communication ‘Towards a Common Immigration Policy’. The document states that “[a] successful immigration policy requires a committed and consistent policy at both national and EU levels” (European Union 2007). In 2008 the European Union produced a communication entitled ‘A Common Immigration Policy for Europe: Principles, Action and Tools’, stating that immigration may have positive potential but that this will be realised only on condition that integration into the host society is successful. What is required is “an approach which does not only look at the benefit for the host society but takes also account of the interests of the immigrants.” (European Union 2008, 3.)

With regard to European identity, it should be noted that there is constant and ongoing debate over the question what Europe actually is. As Pertti Anttonen (2005, 99) writes, Europe has become “a popular frame of reference, making the idea and concept of Europe a topic of constant discussion and definition.” The question has been raised, however, as to how in a situation of increased cultural plurality the ‘others’, i.e. newcomers, members of ethnic and religious minorities, should be taken into account. Amin Ash (2004), for example, distinguishes between the old idea of Europe and that of a new, multi-ethnic Europe. When describing the old idea of Europe Ash writes that

[t]he prevailing idea of Europe is based on four myths of origin: first, the supremacy of a legal system based on Roman law; second, an ethos of social solidarity and common understanding based on Christian piety and humanism; third, a democratic order rooted in recognition of the rights and freedoms of the individual; and fourth, a universalism based on Reason and other Enlightenment principles of cosmopolitan belonging (Ash 2004, 2).

Ash (2004, 6-8) argues for a new 'common ideal', "a new imaginary of European belonging", in which Europe is recognised as a region of "multiple and mobile identities ... moving towards cosmopolitan attachments." I return to the question of 'ideas' of Europe in the next chapter.

Religious landscape of Western Europe

The religious field of Europe has become fragmented, and is continuously becoming more so (Sakaranaho 2006, 19). There are two parallel processes taking place: secularisation and pluralisation (Sakaranaho 2006, 19; Draulans & Halman 2003, 371-372). The secularisation thesis, in its simplest form, says that there has been a decline in the influence of organised religion (Bruce 1996), and/or in religious belief and practice (see Turner 2011, 106). According to Turner (2011, 9-10), in the 1960s the secularisation paradigm became popular among academic sociologists; in the 1970s and 80s the importance of religion as a central topic in sociology came under question, since in keeping with modernisation theory it was assumed that religion no longer played a significant role in social organisation. Today, however, it is widely held among scholars of the sociology of religion that the secularisation thesis as such was originally too narrow, focusing too much on the United States and Great Britain (Turner 2011, 148; Casanova 1994). In fact, Europe has faced an "eruption of the religious in the public sphere". This has even led some scholars to challenge the view that modern societies are secular. (Turner 2011, x.) Because of the difficulties involved in the concept of 'secularisation', various alternatives have been proposed. For example Grace Davie (2006) considers that it is more accurate to speak of the 'de-Christianisation' of Europe than of its secularisation.

Despite the difficulties relating to the scholarly use of the term, it is commonly agreed that the roots of secularisation can be traced to the rise of individualism and rationality after the Reformation (Bruce 1996). Since then, the nature of religion and its place in the modern world have fundamentally changed. In the words of Steve Bruce (1996, 230), "individualism threatened the communal basis of religious belief and behaviour, while rationality removed many of the purposes of religion and rendered many of its beliefs implausible." Individualisation made people freer and gave them greater autonomy to decide for themselves. Simultaneously, religious beliefs became increasingly dependent upon personal desires, ideas and preferences (Turner 2011, 10; Draulans & Halman 2003, 372.)

For the purposes of this study, I want to point out five important consequences of the process of secularisation. First of all, secularisation has involved the differentiation of society into various separate societal spheres; in the process, religion has become just one subsystem alongside others (Turner 2011, 10; Draulans & Halman 2003, 371).

Secondly, religion has had to adjust to new ‘living conditions’. It has been forced to enter the secular sphere which has meant that religion “has become a set of institutions that function to support the secular world rather than a set of institutions that shapes and directs the world.” The states have domesticated religion by making it part of a system that provides welfare contributions in society. (Turner 2011, 31.) Furthermore, as Turner (2011, 277) writes, religions have been drawn into “the global circuits of capital insofar as they are themselves converted into lifestyles and into agencies offering commodities and services that cater the needs of their clients.”²²

Third, as Davie writes in her book *Religion in Europe: A Memory Mutates* (Davie 2000, 30), modern European societies in particular can no longer maintain their religious memory. She refers to the theory proposed by Danièle Hervieu-Léger, according to which religion is a specific mode of believing. Through believing, the individual believer not only becomes part of a chain that brings together past, present and future members, but also becomes a member of the tradition that upholds a society’s collective memory. It is this collective memory that serves as the basis of that community’s existence. Losing this tradition makes societies ‘amnesic’. This ‘chain of memory’ has been broken in the course of a long period of possessive individualism, along with a more recent period of neo-liberal economic policies.

The fourth important consequence of secularisation is that the ties that bind people into communities have grown thinner and weaker (Turner 2011, 31). This in turn has had led to a loss of social consensus and solidarity among citizens. Following Talcott Parsons’ interpretation of Émile Durkheim’s sociology of religion, Turner (2011, 296) argues that “the ultimate roots of community are sacred and thus that which binds people together into powerful, typically emotional groups, are religious forces.”²³ However, with secularisation “[t]he sacred roots of collective culture are being eroded by globalisation in the shape of commercialisation and commodification” (Turner 2011, 296-297). In sum, modern religion, characterised by subjective and emotional individualism, has caused a loss of solidarity among citizens (Turner 2011, 275).

Fifth, it should also be borne in mind that despite secularisation, religions still have an impact on citizens and on society; to put it another way, “social life can never be an entirely secular arrangement” (Turner 2011, xxvii). Durkheim argues that fundamentally “religion is something eminently social” (Durkheim 2001, 11) and many sociologists of religion consider that “what counts as ‘religion’ does not decline; it just keeps transforming”

²² In contrast to this trend there are also forces opposed to capitalism or consumerism and championing more traditional forms of religion. Political Islam is one example of this type of movement. (Turner 2011, 277.)

²³ I return to the details of Durkheim’s theory of religion later in this chapter.

(Turner 2011, 11). Because of the integrative function that religion performs in the lives of individuals, as Thomas Luckmann (1966) and Edward I. Bailey (1997) argue, it persists in less visible and less explicit ways. Davie (2006, 24) writes about ‘vicarious religion’, meaning that acts relating to religion are “performed by an active minority but on behalf of a much larger number, who (implicitly at least) not only understand, but, quite clearly, approve of what the minority is doing.” One implication is that church leaders “embody moral codes on behalf of others” (Davie 2006, 25). Similarly Craig Martin (2009, 150) writes that while religious institutions have the right to socialise citizens, for example through education, churches, families etc., it should be noted that this right has “an incredible ‘public’ significance”.

The place of religion in Europe?

Above I wrote about the social dimension of secularisation. It is also necessary to discuss about normative dimension of the phenomenon in Europe and how it has been challenged. As David Lehmann (2006, 281) puts it:

If we compare Europe to the US, it is noticeable that although religious attitudes clearly are playing a prominent part in US politics at present, fuelling sometimes almost violent rhetoric, there are, however, no serious running disputes about the *place* of religion such as we have in Europe. (Italics in original.)

In secular European states religion is not only considered to be a non-political matter but also a matter of private and personal belief (Turner 2011, 169).²⁴ According to Casanova (2009, 233), it is a “[w]idely shared assumption that it is best to banish religion from the public sphere in order to tame the passionate conflicts and irrational attitudes which religion is assumed to bring into politics.” The historical roots of this kind of arrangement can be traced to the seventeenth century. According to Timothy Fitzgerald (2007a, 154), at that time “the identification of ‘religion’ with ‘church’, and of ‘politics’ with ‘state’, was first rhetorically appropriated”. Fitzgerald writes:

The conceptualisation of “religion” and “religions” in the modern sense of private faith, or the related sense of personal adherence to a soteriological doctrine of God, was needed for the representation of the world as secular, neutral, factual, comprehensively quantifiable

²⁴ It is useful to distinguish between the concept of the ‘secular state’ and the notion that a state is secular. France is a secular state while Britain is not, due to its close relation to the Church of England. On the other hand, all European nations are secular in the sense that religion is a matter of “private choice not to be dictated by the state, and ... the state, while ensuring religious freedom, does not enforce a particular set of religious practices or beliefs”. (Lehmann 2006, 280-282.)

realm whose natural laws can be discovered by scientific rationality, and whose central human activity is a distinct “non-religious” sphere or domain called “politics” or “political economy”. ... *The crucial logic is separation into two essentially different domains.*²⁵ (Fitzgerald 2007b, 6; italics added.)

However, there are several ways in which the distinction between the public and private spheres can be, and actually is, criticised and/or challenged. For example Jürgen Habermas has recently raised questions concerning the place of religion in apparently secular societies. His criticism of the idea that religion should be banished from the public sphere can be explicated by applying John Rawls’s (1993, 60-62) idea according to which citizens can hold certain values privately – for example values that are completely or partly derived from religious affiliation or secular humanistic values (private sphere) – and can simultaneously share those values and principles that apply only in the field of politics and are seen as a precondition for a just and functioning society (public sphere). Furthermore, political actions or decisions cannot be legitimated by principles or views derived from a particular religion. Decisions are required to be grounded in principles that all are expected to accept. This idea is known as the ‘condition of publicity’. (See Habermas 2006, 4-5; Räikkä 1998, 101-111.²⁶)

Contrary to this view, Habermas argues in his article ‘Religion in the Public Sphere’ (2006) that a dialogue between religious and secular outlooks, using both secular and religious language, is fully appropriate at the level of public debate (see also Taylor 2007; 2002, Habermas 2002). It can also be questioned whether citizens actually are able to respect the ‘condition of publicity’.

More importantly, with mass immigration religion has become an important public issue. Diasporic communities, especially Muslim ones, have not only changed the religious landscape of Europe but have also forced European societies to re-evaluate the influence of religion on society and to re-open the debate over the place of religion in both public and private life (Davie 2006, 32). The point is that the culture that immigrant Muslims have inherited does not recognise the notion of private religion (Lehmann 2006, 284).²⁷ As Sakaranaho (2006, 19) writes, “Muslims seek to establish

²⁵ According to Fitzgerald (2007a, 154), the meaning of the concept ‘secular’ came to acquire the nuance of ‘non-religious’ in the late eighteenth century. The understanding of the meaning of the concept, however, has changed in the course of history. This has led scholars to argue that the concepts ‘religion’ and ‘secular’ are actually co-produced: “The ‘invention’ of one leads to the co-invention of the other” (Knott 2010, 120). As Fitzgerald (2007a, 159) writes: “I would ... argue that the secular standpoint, understood as non-religious in the sense either of neutrality or of reductive hostility towards ‘religion’, is actually made imaginable by the claimed existence of religions themselves.”

²⁶ Both authors refer to Rawls’s *Political Liberalism* (1993).

²⁷ It is worth noting that the idea that religion belongs to the private sphere is a Western

European Islam and thereby strengthen the role of religion in this continent.”

Third, as Turner (2011, 103) points out, in the West the states have become involved in the management of religions, with the result of an inevitable departure from the traditional separation of state and religion. According to Turner, “[p]aradoxically, by intervening to regulate the religion in the public domain, the state automatically makes religion more important and prominent.” Turner (2011, 105; referring to Spinner-Halevy 2005), writes that “[t]he privatisation of religion – the cornerstone of the liberal view of tolerance in the legacy of John Locke – is thought by many observers to be no longer a viable political strategy in the separation of state and religion.”

It is also worth noting that sheltering the public from religious influence has also been challenged in practice within modern Western democracies: According to Habermas (2006, 1), during the presidency of George W. Bush, the United States faced a “political revitalization of religion”. This was because Bush had “a coalition of primarily religiously motivated voters to thank for his victory” (Habermas 2006, 3).²⁸

In addition to these points made above, it should be borne in mind that it is not at all clear that religion currently is, or can be, kept apart from the public sphere since European countries have a long history of one religious institution being dominant (Lehmann 2006, 291). Because of this, the religion to which the majority of citizens belong to is constantly present in the public culture, but largely in an invisible manner. This is so because this particular religion has had a close connection to the society for a long period of time. As Sakaranaho (2006, 68) points out, “in the liberal democracies of Western Europe, the public domain is not so free of religion as it is at times portrayed to be”:

it is much easier to be ‘religion-blind’ with those representing the religion which is the most prevalent in society. In such situations, the threshold between private and public becomes practically invisible because time and the physical environment are fashioned both in public and private life according to the same religious tradition. (Sakaranaho 2006, 69.)

The European calendar, for instance, is structured in terms of the Christian faith and citizens live in a “symbolic environment which is marked by Christianity”. It is a fact that “celebrating Christmas and resting on Sundays are important markers in European social life, even if in practice they no longer hold distinctive religious value.” (Sakaranaho 2006, 69.) Furthermore,

one. For example in some Muslim countries, and in Israel as well, religious (family) law is either an alternative or a substitute for secular civil law.

²⁸ Habermas provides statistics on voters’ religious affiliation; he refers to the article ‘President Bush Benefits from Efforts to Build a Coalition of Religious Voters’ in the *New York Times*, Nov. 5 2004, by L. Goodstein and W. Yardley (2004).

Sakaranaho (2006, 351) notes, in some European countries, such as Great Britain, Germany, Norway, and Sweden, the Christian cultural heritage is regarded as part of the national culture, which is “yet another example of the way religion in recent decades has found its way to the public of the society”. This has led some scholars to use a sceptical expression, “the liberal myth of multicultural Europe”.

Cultural plurality

As I noted above, all European nations exhibit some degree of plurality in the spheres of culture, values and religion.²⁹ The Norwegian scholar Geir Skeie (2006b) refers to this sociological fact as ‘traditional plurality’. With regard to religion, ‘traditional plurality’ refers to “the existence of a variety of different religious groups and/or religious views in a specific context like contemporary Western society” (Skeie 2006b, 312). However, in order to better describe and comprehend the religious landscape in Europe, Skeie also suggests the term ‘modern plurality’. This refers to the social context within which religious plurality is situated, and reflects the fact that in contemporary Western societies citizens are exposed to a more or less constant flow of ideas, values, ideals, models and alternative choices of action (Skeie 2006b, 314).

One interesting feature of ‘modern plurality’ is that it does not involve merely increased diversity within religions, but that in particular diasporic religions are facing ‘border problems’ (Turner 2011, 167).³⁰ In the context of ‘modern plurality’ we see internal or ‘indigenous’ debates within religious traditions because citizens are exposed to different values, ideals and modes of living. Turner, for example, writes of changes taking place within Muslim communities, arising from the fact that it is not clear to all members what norms a good Muslim should adhere to in a secular society (Turner 2011, 174). The question has become difficult to answer, since new situations and new sources of authority have emerged to challenge the traditional framework of the social consensus. As a consequence, a new type of Muslim

²⁹ It is worth noting that the concept of ‘culture’ (already) implies a plural, in the sense that we become aware of our own culture or cultural traits when we encounter another culture. The us-them distinction is an implicit assumption when we use the concept. (See e.g. Angus 2002, 74.) In this sense, the concept of ‘cultural plurality’ is tautological. However, since I want to emphasise the point that societies contain many competing cultures, the term ‘cultural plurality’ is more informative.

³⁰ Turner (2011, 167), following Fredrik Barth (1998), writes that in order to exist it is necessary for religious groups to retain boundaries. The maintenance of a boundary is fundamentally a matter of the existence of ‘inside’ and ‘outside’. Members of a certain group may have dissimilar values and practices, as long as there is something that marks the outside and inside, in other words that defines the boundary of the group against other social groups.

consensus is currently developing, for example via on-going Internet debates through blogs, Facebook, Twitter etc. (Turner 2011, 154-155.)

This is an interesting development. In this thesis I explore the ways in which pupils are encouraged by the schools to use skills of critical enquiry, allowing them to scrutinise and reflect upon the beliefs and values they encounter. As noted, some religious parents, Muslim parents in particular, are afraid of losing their children to the dominant culture and want to shelter them from alien influences. We can ask: in which areas are cultural values and practices left to the families? In which ones does the state take responsibility, ensuring that children are presented in the schools with different ideas, values, ideals and alternative choices of action, and are enabled to evaluate different moral positions? Furthermore, do the states make strategic choices, and if so of what kind, to foster the internal development of religious traditions toward greater appropriateness for a secular society?

For the purposes of this thesis, it is useful to distinguish three different levels or modes of cultural plurality. First, it is obvious that within modern societies there are differing – and certainly conflicting – views as to the nature of reality. By this I mean that individuals have different opinions about what constructs the reality we are living in. For example, some of us are materialists,³¹ while others believe in the existence of non-physical entities such as God and other members of the category of supernatural agents. In short, different individuals give different answers to ontological questions. In this sense, we can speak of an ‘ontological’ level of cultural plurality.

Cultural plurality is also manifested at the level of values or beliefs that individuals consider important or worthwhile. We can call this the ‘normative’ level of cultural plurality. Needless to say, convictions at this level often have a connection to commitments at the ontological level. In particular many religions involve the perception that a superior and non-empirical force has handed down ethical principles for adherents to follow.³²

Thirdly, there are differences among citizens at the level of practices. It is clear that practices may be closely connected to individuals’ ontological and normative commitments. This can be called the ‘practical’ level of cultural plurality.

The liberal principle tells us that every individual has the right to choose the kind of life he or she wants to lead, as long as they do not hurt other people’s equal rights.³³ As I shall show in this thesis, however, the states

³¹ By materialism I mean a conviction according to which there exist only material entities; or at least that all mental phenomena have a material basis.

³² Logically it is implausible to derive values from simple facts about the nature of reality.

³³ This is called ‘negative freedom’, since it guarantees a person freedom *not to be* subjected to an action of abuse or coercion (see e.g. *The Cambridge Dictionary of Philosophy* 1999, 723).

seem to have increased their control at all three levels of plurality with regard to some of the beliefs entailed by religions. In the case of ontological questions, the states normally give citizens broad freedom to hold whatever opinions they like as to the nature of the world. However, there is evidence that in the field of education some European states, as well as the Council of Europe, have tightened control over the kinds of ontological presuppositions provided to pupils.³⁴ If we move towards other levels of cultural plurality, i.e. the normative and practical levels, in recent years some European countries have shown increased interest in monitoring certain religious practices, such as the wearing of religious symbols in public (see e.g. Davie 2006). In addition, as I argue in this thesis, the states have also become increasingly interested in citizens' ethical attitudes and want to regulate these as well.

Modern pluralities are also linked to debates over moral values, in the sense that it "is often assumed that the great diversity in contemporary, individualized society generates conflicts instead of a consensus of values, moral behaviours and convictions" (Draulans & Halman 2003, 398). In their article 'Religious and Moral Pluralism in Contemporary Europe' (2003), Veerle Draulans & Loek Halman present their findings regarding the effects of secularisation, individualisation, rationalisation and increased religious pluralism in Europe. Their conclusions are based on an analysis of data from the European Values Study from 1981 and 1990. I want to mention two findings in particular. First, Draulans & Halman conclude "that there is not one single, dominant pattern to explain the influence of religion (or secularisation) on moral opinions" (Draulans & Halman 2003, 397). Furthermore,

the simple presupposition that the younger generations will be more heterogeneous as far as their religious and moral opinions are concerned compared with the older generations is not supported, nor do changes over time provide much evidence that support the idea of increasing levels of pluralism (Draulans & Halman 2003, 397).

For instance, in Denmark, Sweden, and Iceland pre-war generations appear to be more pluralistic, and the "youngest generation less!" (Draulans & Halman 2003, 392). In their conclusion regarding changes in individual morality due to a changing religious landscape, the authors write that "[t]he results of our analysis do not provide strong arguments in favour of such ideas about moral decline and the necessity to invest more energy in communities built upon a strong 'we'-feeling as a dam against (perceived hyper-) individualisation" (Draulans & Halman 2003, 398). This last point refers to communitarian claims that in order to create a firm moral order in society there is a need to create a stronger 'we' feeling. Their conclusion is interesting, and offers an

³⁴ I return to this issue in Chapters 4 and 6.

useful perspective for my analysis in Chapters 2, 3 and 4, where I describe measures taken by Great Britain, the Netherlands, Sweden and Denmark to increase cohesion among their citizens.

Research strategy

In my research questions I focus on several topics, each with its own specific questions. My main method is argument analysis, which I complement with thematic analysis and discourse analysis.³⁵ I begin by exploring how nations and regional actors, such as the Council of Europe and the European Union, perceive and articulate themselves as institutions. I find this topic important because the process of self-identification is indeed one manifestation of what might be called an overall policy for the treatment of cultural diversity. I chart the argumentative process of constructing a national identity by exploring the use of the first person plural pronoun, ‘we’.

An important point to be taken into account with regard to national or European self-understanding is that a descriptive conception about who ‘we’ are also has a normative side: prescribing what is required of citizens for them to be recognised as ‘respected’ members of that society (see e.g. Parekh 2000, 202-203).

The next step in my approach is to move towards the question of how differences in citizens’ various cultural backgrounds have been and currently are perceived. The focus is on the treatment of religious minorities. The philosophical background to this question is derived from the suggestion that culture-dependent identity needs to be recognised or even protected. The point is that as well as being citizens, i.e. members of a political community, we are also – indeed often primarily – members of a particular cultural community, and it is precisely this membership that has a great impact on who we are (see Kymlicka 1989a³⁶). As communitarians argue, our sense of identity is inseparable from our awareness of ourselves as members of a particular family, class or community that holds certain values (see Sandel

³⁵ The findings of argument analysis serve as a starting point for further thematic analysis and discourse analysis. I apply thematic analysis as a method for identifying, analysing, and reporting themes within the empirical material. (See e.g. Boyazis 1998.) I use discourse analysis to clarify how groups and categories are articulated and defined and to consider what practical outcomes articulations and definitions may have. My point of departure is Foucault’s notion that discourse is related to power. In his genealogical studies Foucault showed how statements and ‘sets of statements’ act as rules and acquire authority eventually coming to manifest themselves as institutions. In the context of mental illnesses, for example, medical records of the insane are not only neutral statements but powerful tools that define what is madness and what or who represents sanity. (Arribas-Ayllon & Alkerdine 2008). The Foucauldian discourse analysis highlights the productive side of language in that it establishes groups, categories and subjects (Arribas-Ayllon & Alkerdine 2008; Wooffit 2005, 146-147).

³⁶ I present Kymlicka’s theory in Chapter 3.

1982, 67). From this point of view, it has been argued that members of cultural minorities cannot adequately protect their cultural interests and are forced to assimilate into the majority (see Young 1990; Kymlicka 1995; Parekh 2000).

For each of the four nations I look at changes in policies regarding the treatment of minorities, from the earliest days of the current wave of immigration to the present. Have there for example been any changes in how members of minority groups are recognised as bearers of distinct cultural identity? What kind of models for dealing with cultural plurality can be distinguished? What responsibilities do nations currently place on their citizens?

To answer questions concerning identity and the treatment of diversity, I examine three kinds of sources: (i) official political documents, (ii) statements by politicians, and (iii) recommendations by advisory groups dealing with the management of cultural diversity and/or immigration.³⁷

³⁷ The material from Great Britain consists in two White Papers issued by British government: *Secure Haven, Safe Borders: Integration with Diversity in Modern Britain* (2002) and *Improving Opportunity, Strengthening Society. The Government's strategy to increase race equality and community cohesion* (2005). In addition I analyse three independent reports from advisory groups, namely *Education for citizenship and the teaching of democracy in schools* (1998); *The Future of Multi-Ethnic Britain* (2000) and *Community Cohesion: A Report of the Independent Review Team Chaired by Ted Cantle* (2001).

In the case of the Netherlands the material consists of two government White Papers: *Minderhedennota (A memorandum on minorities)* (1983) and *Contourennota integratiebeleid etnische minderheden (A report for integration policy for minorities)* (1994). I also refer to two press releases concerning the actions of the Government of the Netherlands: 'Shared values in spite of differences' (2004) and 'Majority of ethnic-minority women disadvantaged' (2004). In addition, I discuss a report by the Scientific Council for Government Policy, WWR, *Identificatie met Nederland (Identification with the Netherlands)* (2007).

The material for Sweden consists of four White Papers issued by the Swedish parliament: *Regeringens proposition om riktlinjer för invandrar- och minoritetspolitiken (The government bill on guidelines for immigrant and minority policy)* (1975); *Regeringens proposition om invandrapolitiken (The government bill on immigration policy)* (1986); *Regeringens proposition om aktiv flyktning- och immigrationspolitik (The government bill on active refugee and immigration policy)* (1991); and *Sverige, framtiden och mångfalden – från invandrapolitik till integrationspolitik (Sweden, the future and diversity: from immigration policy to integration policy)* (1997). In addition I explore Swedish Government's white paper *Empowerment against exclusion – Governments strategy for integration (Egenmakt mot utanförskap – regeringens strategi för integration)* (2008).

In the case of Denmark I analyse two White Papers issued by the Danish government: *Regeringens visioner og strategier for bedre integration (The government vision and strategies for improved integration)* (2003) and *Regeringens strategi mod ghettoisering (The government strategy against ghettoisation)* (2004). In addition I refer to a scholarly publication concerning a White Paper issued by the Danish Ministry of Education, *Uddannelse og fællesskab (Education and Community)* (1999) and a document published

My interest in official documents and statements by politicians is due to the fact that politicians have a special power to “identify, to categorize, to state what is what and who is who”, since they can impose “the categories, classificatory schemes, and modes of social counting and accounting with which bureaucrats, judges, teachers, and doctors must work and to which non-state actors must refer” (Brubaker & Cooper 2000, 15-16). This means that in these documents and statements, through the use of language, reality is not only constructed but also regulated, in the sense that statements, recommendations and decisions are intended to be applied in practice.

The documents are written so that their argumentative structure can be traced and presented. They can be treated as teleological explanations for actions, in which the basic idea is that someone sets out to do something because she/he wants to achieve a certain goal. Documents and statements consist of recommendations or even prescriptions for practical actions (conclusions) and groundings (premises) for these. They are provided because certain phenomena in the society are perceived as undesirable and needing to be corrected; minimally, it is thought that even if not that bad, things could be better.³⁸ From this perspective, we are dealing with a mode of reasoning known as *practical syllogism* (or *practical inference*): in a certain situation *s*, at time *t*, an act *a* is regarded as necessary in order to achieve a desired outcome or goal *p*. The formal mode of the argument goes as follows:³⁹

A intends to bring about *p*.

A considers that he cannot bring about *p* unless he does *a*.

Therefore A sets out to do *a*. (von Wright 1971, 96.)

Applying this kind of analytical tool as a basis of my enquiry, I seek to find answers to several questions. First, what exactly is seen as wrong in a society,⁴⁰ and what kind of behaviour is considered undesirable? Secondly,

by the Minister of Education Margareth Vestager and Ministry of Education: *Værdier i virkeligheden (Values in Practice)* (2000).

I have put an end date of these documents to a year 2008. I am aware of the possibility that in cases where I lean on academic analysis, the ideas and attitudes of the scholars in question can ‘creep’ into my discussion. I try to avoid this unwanted effect by referring directly to the original source as much as possible.

³⁸ In an article ‘What is Political Discourse Analysis?’ (1997), Teun A. van Dijk puts this as follows: “[q]uite typical for much political discourse is the fact that references to the present tend to be negative, and those to the future positive: Indeed, their *raison d’être* is to design policies that make life better, or at least prevent (further) deterioration or catastrophe.” (van Dijk 1997, 27.)

³⁹ The practical syllogism was first presented by Aristotle in *Ethica Nicomachea* (Book 7, Chapter 3). Georg Henrik von Wright (1971) developed the idea of the practical syllogism as a model to explain the intentionality of human behaviour.

⁴⁰ According to van Dijk (1997, 27) “[f]ollowing the basic principles of many aspects of the political process, we may ... expect political actors to topicalize especially what is

what reasons do politicians and members of advisory groups give for the current situation; in other words, what has been done, or left undone, to allow the current situation to become a reality? Third, what concrete actions – in a situation of plurality – do politicians, other decision-makers and members of advisory groups suggest be taken, and what are the goals that the actions suggested are intended to achieve? What kind of society is seen as desirable? More specifically, what are the values and virtues that citizens should possess, and what (other) responsibilities do they have towards the nation?

The basic outline of the argument consists of four premises and a conclusion, and in the ideal situation all of these can be traced:

Premise 1 contains one or more facts about the society (factual statement, based on empirical evidence).

Premise 2 contains an attitude towards Premise 1: Premise 1 is perceived in a certain way, i.e. it is seen as undesirable (normative statement).

Premise 3 contains an expression referring to what is actually wrong (expressed as factual statement).

Premise 4 expresses the view that the current situation is the outcome of certain previous actions: something has either been done or has failed to be done (expressed as factual statement).

Premise 5 contains an expression about the goal (normative statement).

The Conclusion expresses the view that taken together, some or all of the premises give reason for certain action(s) to be taken in order to correct the situation in the society (to achieve the goal).⁴¹

In focusing the analysis on the educational system of these four countries, I ask what actions politicians and advisory groups have suggested and/or governments have taken in order to make education respond better to the challenge of cultural plurality. I am also interested in the kinds of changes (if any) that have been made in the curriculum in this respect. In addition, I look at how faith schools⁴² are currently perceived by politicians. The material consists of two kinds of texts: articles from leading newspapers, and official documents dealing with the organisation and content of education.

With regard to the content of moral and ethical education, my interest is in the values that pupils are expected to internalise and in the ethical attitudes cultivated in pupils. I examine the normative framework designed to guide school arrangements and the content of values and moral education. These

now the case and what should be done about it.”

⁴¹ A sound or valid normative argument needs to include one or more value statement in its premises. In this way the is-ought problem can be avoided.

⁴² By ‘faith schools’ I mean schools that have a special religious character.

documents include legislative education acts, curricula, syllabi for religious education, and recommendations issued by authorities in educational matters.

After exploring governmental strategies I focus on the question of the legitimacy of the content of religious education. My aim is to determine what kind of content is in accordance with the human rights perspective provided by the United Nations and the Council of Europe.⁴³ I also analyse statements issued by the Council of Europe on the issue, along with all relevant cases brought before the United Nations Human Rights Committee and the European Court of Human Rights. In this analysis I do not refer to national cases. This is because these international and regional perspectives are intended as obligatory and binding. I am especially interested in what kind of RE content is regarded not only as appropriate but also as necessary in present-day Europe. Here I refer to Jackson's (2004a, 159) notion that the educational provision of RE cannot be viewed in isolation, as solely a matter of a nation's own choice.

Questions as to the 'appropriate' place of religion are dealt with in this thesis as a persistent and recurring theme,⁴⁴ to be returned to in each chapter. I apply two theoretical resources from religious studies: Kim Knott's methodological model for locating religion in secular contexts, and Émile Durkheim's theory of religion, as presented in his book *The Elementary Forms of Religion*. I find both approaches useful for my purposes, in the ways they model and explain the functioning of the social world.

Knott's model is presented and discussed in her book *The Location of Religion: A spatial analysis* (2005), and in an article entitled 'Theoretical and Methodological Resources for Breaking open the Secular and Exploring the Boundary Between Religion and non-Religion' (2010). In this model, the terms 'secular' and 'religious' are seen as "discursively constructed, negotiated and policed" 'forces' that create power fields or 'camps' (see Figure 1).⁴⁵

⁴³ The relevant legislative framework consists of the following Conventions: (i) the International Covenant on Civil and Political Rights (ICCPR); (ii) the International Covenant on Economic Social and Cultural Rights (ICESCR) by UN; and (iii) the European Convention on Human Rights (ECHR), issued by the European Court of Human Rights.

⁴⁴ The questions were: to what extent space is allocated for religion in the state and its public affairs (especially in the field of education); what expectations and responsibilities are placed on citizens in general and religious citizens in particular; and how the domain of the 'secular' is preserved from the impact of the domain of the 'religious'.

⁴⁵ It should be noted that the distinction can ultimately be reduced to the ways in which the concepts 'religion' and 'secular' are understood and deployed. The meaning of these concepts has changed over the course of history, and the process is certainly still going on. In this sense, the distinction is thus necessarily vague and unstable (see Knott 2010, 118-120); in other words, these two categories do not have fixed meanings (see Fitzgerald 2007b, 23).

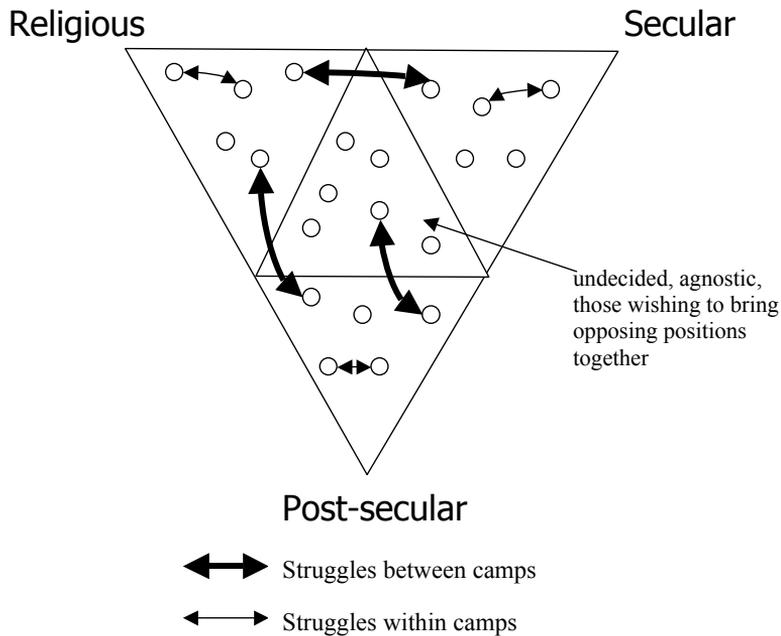


Figure 1. The religious / secular field and its force relationships (Knott 2005, 125).

Knott writes of “struggle and warfare” not only between power fields but also within them. Referring to Foucault, the relationship between ‘camps’ can be viewed as a ‘strategy of struggle’ in which oppositional forces “are not superimposed” and do not “become confused” but maintain their specific nature (Knott 2010, 122). The presence of the post-secular is explained as follows:

As the relationship between ‘religious’ and the ‘secular’ is dialectical and not merely oppositional, the field is shown to include a third camp, the ‘post-secular’ (Knott 2005, 125) which often makes use of the notion of ‘spirituality’ rather than ‘religion’ or ‘religiosity’ (Knott & Franks 2007, 2).

Knott’s model gives insight into the various variables that affect the position of religion in Europe. Above, I have written that European societies have been forced to re-evaluate the influence of religion on society and to re-open the debate over the place of religion in both public and private life (Davie 2006, 32). I focus, first of all, on the ‘struggle between camps’: is the public sphere, representing the secular (more precisely the non-religious) protected from the impact of the religious by politicians, secular officials, members of

advisory groups, and courts of law? If so, what form does this protection take?

Secondly, I am interested in what central ideas are regarded as important or even necessary ingredients of the secular. Knott writes that controversies among different ‘camps’ “reveal some of the *deeply held views and values* which constitute the field and mark out the territorial areas and lines of engagement within it” (Knott 2005, 125; italics added). Opening up this issue gives insight into why certain practical choices are suggested with regard to accommodating religious diversity, both in general and in the field of religious education in particular. As Sakaranaho (2006, 315) writes, “[o]f all fields of society, education is the one ‘straddling’ between the private and public realms.”

In addition, I investigate the process of maintaining and rewriting the borders of the public and the private domain. I take into account all statements that deal with religion as well as interpretations as to what ideas are regarded as belonging to the secular public sphere. With regard to the concept of ‘religion’, my starting hypothesis is that in the documents and statements it is understood in a rather simple manner. I refer here to Knott’s (2005, 59) use of the term ‘conventional religion’, referring to “religious institutions, their traditions, beliefs, and practices, and those who to a greater or lesser degree adhere to them.”⁴⁶ Knott argues that “[t]his is what most people in the West generally mean by ‘religion’”. However, it should simultaneously be noted that ‘religions’ are dynamic constructions that are in constant interaction with social institutions and individuals, and thus have an impact, active or passive, on these and vice versa.⁴⁷

I apply Durkheim’s theory of religion with regard to the research question ‘what responsibilities is put on citizens’. Durkheim defines religion as a social system of beliefs and practices, which need not involve a belief in a supernatural agent, for example a High God or gods. It is precisely their practices and beliefs that unite adherents or members of a group into a single

⁴⁶ This is the *emic* usage of the term ‘religion’ in this thesis.

⁴⁷ This is the *etic* usage of the term ‘religion’ in this thesis. I am not claiming that religion as such exists. Religion is an intellectual abstraction; it cannot be studied directly, since it appears only in individual minds, feelings and behaviour. However, we can call thoughts, feelings and behaviour of individuals as ‘religious’ only when we have explicitly defined the term ‘religion’. There is, however, no consensus among scholars as to what such a definition might be. Rather, rigid definitions are not regarded as an appropriate starting point in the study of ‘religion’. (Saler 2000, 212-225.) For example Benson Saler (2000, 226) writes that “there are no clear boundaries drawn about religion. Rather, elements that we may apperceive as ‘religious’ are found in phenomena that numbers of us, for a variety of reasons, may not be prepared to dub religions.” It should also be borne in mind that any definition of religion is always excluding; Jonathan Z. Smith (2004, 39) argues that any given content prevents the creation of something new, and may easily lead to false conclusions. Thus religion is currently studied mainly on the basis of open-ended and instrumental definitions.

moral community. In this sense religion is a ‘power’ or ‘force’ that does the job of keeping the members of a certain social group together. (Durkheim 2001, 46.) Religion survives, in Durkheim’s view, because it satisfies an important social function. However, this can also be seen other way around: religion is an essential component in the actual construction of the social world.

The essential point in Durkheim’s theory of religion is the division of the universe into two mutually exclusive parts, the sacred and the profane. In this distinction, the dichotomy between the individual and the collective plays a crucial role. As Jonathan Z. Smith (2004, 386) writes:

[f]or Durkheim, alternation between ... two types of time, one individual another collective, is in fact the social origin of the distinction between the profane and the sacred. It is this temporal opposition that marks the two qualities.

My interest in Durkheim’s theory is connected with his idea that in order to exist a society needs “at regular intervals sustain and reaffirm the collective feelings and ideas that constitute its unity and its personality” (Durkheim 2001, 322). But what form does this take in present-day Europe? Can the dichotomy between the sacred and profane survive in a highly individualistic culture, in a context of globalisation, commercialisation and commodification? Referring for example to Hervieu-Léger’s theory of the loss of collective memory, or Turner’s (2011, 296-297) argument that with secularisation “the sacred roots of collective culture are being eroded”, we can be at least sceptical as to the possibility of a positive answer. Furthermore, it seems that collective symbols, as a part of the sacred history of a particular nation, cannot do the job of uniting citizens, since due to mass immigration many minorities fall outside this nation’s sacred narrative (Turner 2011, 144).

Despite these sceptical views, however, efforts to achieve unity naturally occur. The documents analysed in Chapters 2 and 3 are concrete examples of such efforts. In these documents, I explore what is regarded as the ‘sacred’ foundation of a nation; in other words, what forms the basis of the collective, regardless of individual variation in matters of belief, practices and modes of living. With regard to the concept of the ‘sacred’, I apply a definition proposed by Veikko Anttonen (2000, 281):

[t]he sacred is a special quality in individual and collective systems of meaning. In religious thinking it has been used as an attribute of situations and circumstances which have some reference to the culture-specific conception of the category of God, or, in non-theological contexts, to some supreme principle of life such as love, freedom, equality or justice. Sacrality is employed as a category-

boundary to set things with non-negotiable value apart from things whose value is based on continuous transactions.

In other words, ‘sacred’ equals something that is perceived as non-negotiable; something is perceived as so valuable that it is beyond the possibility of being susceptible or subject to change, revision or compromise. In scholarly use, this idea has recently been applied in wider perspectives and used in secular matters as well, and has thus been freed “from its theological shackles”, to use Knott’s (2010, 133) expression. As Knott (2010, 126) writes:

we have coined the term ‘secular sacred’ to refer to non-negotiable matters of belief and values that do not derive from formally religious sources but that occur within the domain of ‘non-religion’.

Before concluding, it should be noted that I apply Durkheim’s theory of religion as a methodological tool, as a starting point for my analysis, and as a way to grasp the reality. As noted above, his theory is a functional explanation of what is needed in order to keep the members of a certain society together.

Theoretical background

Since in my material equality among citizens is an inherent assumption or goal, I find it useful to frame the analysis in terms of the scholarly debate – among philosophers, sociologists and scholars of religion in education – concerning the question of a just society. The debate also provides an appropriate context and analytical tools: theories, concepts, groundings and conclusions for the evaluation of the empirical material in which government strategies are embodied. I focus on two themes prominent in the debate: (i) how can harmonious co-existence among citizens be ensured, and (ii) how can equality be achieved in a plural society. The past two decades have been very lively time for the debate on these topics.

With regard to the issue of ensuring peaceful co-existence in a fair way among citizens who hold differing or even conflicting views, I find John Rawls’s theory of a just society an appropriate point of reference; not only because nations seem currently to be committed, at least at the level of rhetoric, to ideas similar to those he proposes, but also because his theories have been widely criticised. This criticism has come from two directions: some writers argue that an understanding of equality as treating all citizens in the same manner is problematic (e.g. Kymlicka 1995; Taylor 1992; Young 1990), while others consider Rawls’s liberal ideals to be corrosive to certain, mostly religious, ways of life (Strike 1998; Galston 1995; Tamir 1995; Tomasi 1995). Since both Rawls’s ideas and those of his critics play a

prominent role throughout this thesis, it may be useful at this point to sum up the main lines of his theory.

In his influential book *Political Liberalism* (1993), Rawls takes off from the belief that in modern Western democracies a diversity of comprehensive religious, philosophical and moral doctrines is a permanent feature of public culture. According to Rawls, this diversity is the result of what he calls ‘the burdens of judgment’: different views are not necessarily a consequence of irrationality or ignorance. Instead, the complexity and contradictions of the relevant evidence, the vagueness of our concepts (moral and political ones in particular), and the imponderable but decisive influence of an individual’s moral experience upon his or her judgment result in disagreements among people. In short, the factors mentioned here create the possibility that people, even in similar situations, will arrive at interpretations and conclusions that are reasonable but nevertheless mutually incompatible. (Rawls 1993, 54-66.)

Rawls (1993, xviii) asks: “[h]ow is it possible that deeply opposed though reasonable comprehensive doctrines may live together and all affirm the political conception of a constitutional regime?” His answer consists of four essential features. First, Rawls points out that despite their deep disagreements citizens can share certain values and ideas, which he calls principles of justice. These are justified by appealing to the procedure and structural aspects of an original position, where free and equal parties are placed behind a veil of ignorance; this prevents them from knowing what their position in a society will be.⁴⁸ (Rawls 1993, 22-28.)

The second feature of political liberalism is that in public life shared political values always trump comprehensive values, because there is agreement upon them but not on the values that people hold in private. (Rawls 1993, 60-62.)

This brings us to the third feature of Rawls’ theory: the demand for neutrality or antiperfectionism of a state. Because of the burdens of judgment, a government cannot tie itself to any one comprehensive doctrine. The state cannot justify its actions by referring to some public ranking of the intrinsic value of different ways of life, simply because there is no public ranking to refer to. Stephen Mulhall (1998, 163) sums this up as follows:

Since the freedom and equality of all citizens can be respected only if the state’s coercive powers are deployed in ways that those subject to

⁴⁸ According to Rawls (1993, 5-6; 22-28), people behind the veil of ignorance would agree on two principles of justice:

- a) “Each person has an equal claim to a fully adequate scheme of equal basic rights and liberties.”
- b) “Social and economic inequalities are to satisfy two conditions: first, they are to be attached to positions and offices open to all under conditions of fair equality of opportunity; and second, they are to be to the greatest benefit of the least advantaged members of society.”

this coercion can reasonably be expected to endorse, the fact of reasonable pluralism entails that any use of state power that is justified by appeal to elements of one particular comprehensive doctrine is illegitimate. Instead, appeal must be made only to public reasons – or values and ideas all share or can share.

The fourth essential feature of political liberalism is tolerance. The basic idea is that people can hold whatever beliefs they wish in private as long as they are willing to affirm the supreme political authority of principles that can be justified from the point of view of all reasonable citizens. (Rawls 1993, 10-11; 154.) Rawls believes that citizens who have the virtue of reasonableness will recognise the burdens of judgment, and will consequently endorse the view that different and even incompatible conceptions of the good life can be fully reasonable.

To summarise the above: Rawls gives three independent arguments to explain why only a neutral state policy is acceptable: (i) the criteria for ranking and summing the values are imprecise, (ii) a non-neutral attitude would jeopardise the deliberation of the contractors in the original position, and (iii) perfectionism is liable to engender the suppression of liberty (Hittinger 1994, 595-596).

With regard to the question of how equality among citizens can be understood in a plural society, I make use of two theories of group rights: those proposed by Will Kymlicka and by Charles Taylor. Both theories are in favour of granting special group rights to religious minorities in the name of equal treatment. I present and discuss these in Chapter 3.

In framing my analysis of educational arrangements and the content of moral and values education, I make use of the scholarly debate over questions relevant to my research questions. These debates are presented in Chapters 4 and 5.

Key concepts

‘Culture’

In an article entitled ‘Ontology of Culture and the Study of Human Behavior’ (2002), Ilkka Pyysiäinen (2002, 176) suggests that we should regard culture-concepts not as abstract entities⁴⁹ but as universals, as “abstractions created by the human mind”.⁵⁰ He refers to the three-world model developed by Karl Popper (1972), in which world-1 is constituted by physical and biological entities and world-2 by the human mind (consciousness and cognitive

⁴⁹ Pyysiäinen (2002, 175) argues that “[c]ultures do not exist as abstract entities; nor are they mere names.”

⁵⁰ “[C]ulture-concepts are based on the human mind’s ability to form abstractions and generalizations; they are created by the mind and they exist in the form of mental process” (Pyysiäinen 2002, 175).

processes); world-3 is a product of human minds (e.g. concepts). ‘Culture’ belongs to world-3. It is the product of world-2, but cannot be reduced to it. (Pyysiäinen 2002, 170-174.) What we regard as a particular culture, for example Islam, is thus “a different kind of object than the cognitive process of someone thinking about” that culture (Pyysiäinen 2002, 175).

Following this idea, I apply the concept of ‘culture’ as a socially constructed phenomenon, a specific level of organisation that cannot be reduced to the thoughts and actions of individuals (see e.g. Geertz 1973). However, as there has to be something that *makes* a culture, I turn to the idea proposed by Lincoln (2000). He defines the term ‘culture’ as referring to a group of people and to some factor X that defines this group, while this group also defines the X (in Pyysiäinen 2002, 169). It is in this sense that we can consider a certain culture as a whole, even though cultures are not unified in the sense that everyone defines X similarly. Thus it is possible to speak of religious cultures; Anthony D. Smith (1993, 6), for example, writes that religious identities tend to “join in a single community of the faithful all those who feel they share certain symbolic codes, value systems and traditions of belief and ritual”.⁵¹

However, it should be noted that since ‘culture’ is a socially constructed phenomenon, its “boundaries are not fixed but flexible, blurred and hybrid” (Anttonen 2005, 102). As Pyysiäinen (2002, 175-176) writes, cultures are constantly changing. What happens in world-2 also has an effect on world-3.

Religious groups as cultural communities

A religious group can also be viewed as being a ‘cultural community’. According to Kymlicka (1989a, 135), people are members of two sorts of communities in modern nation-states, namely political communities and cultural communities. The political community is the grouping “within which individuals exercise the rights and responsibilities entailed by the framework of liberal justice.” The cultural community, in contrast, is the grouping “within which individuals form and revise their aims and ambitions.” Within the same cultural community people share a culture “which defines their cultural membership”.

In this thesis I discuss arguments in favour of granting special rights to religious minorities. The point is that religious minorities are regarded as cultural communities that are in need of protection in order to maintain their existence. For example Mark Halstead (1995, 265) argues, referring to his studies on Muslims in Britain,⁵² that for many Muslims “their religion gives

⁵¹ In Chapter 3 I give the example of a case in which two multi-faith coalitions demanded special group rights by arguing that religion is a form or expression of ‘culture’ analogous to ethnic and linguistic minorities (Davies 1999, 11-12).

⁵² See Halstead (1986).

them their distinct identity, and it is their religion rather than other aspects of their cultural heritage which they are most anxious to preserve.” However, it should be kept in mind that religious commitment varies within a given religious community. There are for example Muslims who do not have a religious commitment, just as there are many Christians who do not believe in God. Thus, while the distinction between the two types of community helps to explain the nature or dynamic of a society, it is also dangerous if applied too rigidly – i.e. if all the members of a given community are seen as similar.

Religious education

Following Hull (2001, 3-5), we can distinguish three different approaches to (or aspects of) religious education: ‘education *into* religion’, ‘education *about* religion’ and ‘education *from* religion’. ‘Education *into* religion’ introduces pupils to one particular faith tradition. This form of religious education is taking place in some of the central and eastern European countries, for example in Spain, Italy, Greece, Poland, Bulgaria, and Georgia (see *Religious Education in Europe 2007*) but also in many private schools around Europe.⁵³ This type of education may also have a confessional nature, aiming at instilling religious beliefs or upholding them in pupils. This is especially the case in some private faith schools.

‘Education *about* religion’ is learning about the beliefs, values and practices of different religions. Pupils are taught to understand how religions influence the behaviour of individuals and help to shape communities. Thus for example holy scriptures, such as the Bible or the Qur’an, are not treated as sacred books but as literature, adopting a non-religious perspective. This kind of education is non-confessional, and the content often includes the basic facts about more than one religion. Different levels of cultural plurality are also present; the difference, compared to ‘education *into* religion’, is that the aim is merely to give pupils information and to increase their understanding of religion as a phenomenon in general and about different religions in particular. (Hull 2001.)

‘Education *from* religion’ gives pupils tools to consider different answers to religious and moral issues, thus enabling them to develop their own way of thinking. The idea is that pupils are taught (i) to differentiate religious questions and answers from those of other kinds; (ii) to think for themselves in religious terms; and (iii) to place themselves in the way of the sort of experience, and the kind of value judgments, that such thinking can

⁵³ It is worth noting that in all these countries there are also other goals, at least at the level of the explicitly stated goals of religious education, such as enabling a pupil to live in a diverse world and encouraging personal development in ethical matters (*Religious Education in Europe 2007*).

generate (Hudson 1988, 110).⁵⁴ The depth of this approach depends on how the overall goal of religious education is defined: 'education *into* religion' or 'education *about* religion'. Although it may seem that 'education *from* religion' is closer to the former, it need not be so. It is also possible to teach pupils to think for themselves in religious terms without the objective that they will continue to do so with any degree of conviction or commitment. Just as it is possible for an individual to have a scientific education without going on to find a scientific solution to every practical problem that arises in life, it is equally possible to have a religious education without going on to solve problems that arise in one's life by applying religious answers.

Previous research on the topic

There has been increasing scholarly interest in the policies currently practiced by governments with regard to cultural diversity. This academic debate provides an appropriate foundation upon which to build my enquiry.⁵⁵ The studies represented in the literature vary widely in both their aims and in the materials used. It can be observed, however, that scholars tend to conclude that the policy adopted by a given nation can be described as one of assimilation.⁵⁶ By this they mean, roughly, that a government's actions, directly or indirectly, force cultural minorities to adopt certain qualities already possessed by the majority.

I think we should be cautious in drawing such conclusions. First of all, the concept of 'assimilation' is vague because its use is not solidly established among scholars, not to mention that it is highly value-laden – in multicultural discussions assimilation is mainly considered a negative thing. Secondly, as I discuss later in this thesis, assimilation should be treated as a multi-dimensional phenomenon (Brubaker 2001, 544). By this I mean that

⁵⁴ Hudson writes of 'education in religion' but he obviously means the same thing that scholars currently call 'education *from* religion'.

⁵⁵ In discussing British policies I refer to the findings of Abbas (2005); Back et al. (2002); and Joppke (2004). These scholars have explored the New Labour policy of treating diversity and immigration after it took government responsibility in 1997. With regard to the Netherlands, Brug & Verkuyten (2007); Enzinger (2006; 2003); Karsten (2006); Spiecker & Steutel (2001); Vasta (2007); and Vermeulen & Penninx (2000) have been interested in how the Dutch government has treated its immigrants, mainly Muslims, during the first years of the new millennium. The education policy of the Netherlands is discussed by Driessen & Merry (2006); Karsten (2006); Leeman (2008); Leeman & Pels (2006); Leeman & Ledoux (2003); and Shahid & Koningsweld (2006). In the case of Sweden, I refer to the findings of Dahlström (2004); Graham (1999); and Soininen (1999) concerning changes in Swedish immigration policy. Haas (2008) has investigated Danish policy documents concerning education and immigration that relate to the concept of 'citizenship'.

⁵⁶ The concepts of 'assimilation' and 'acculturation' are introduced and discussed in Chapter 3.

surveys designed to analyse the rhetoric used by governments, or on the other hand to illuminate the educational policy of a given country, are about one specific area of policy. This does not mean that these findings can be generalised. Even if assimilation happens in one particular domain, it does not necessarily occur in others. The third problem is that the question is often treated as a mono-dimensional, with assimilation at one end and active government efforts to cherish difference at the other (Brubaker 2001, 544). Yet another important point is that current policies should be compared with past ones, in order to see whether or not relevant changes have occurred, and if so in what respect. Finally, there is a need to distinguish between rhetoric and practical actions. A change in rhetoric does not necessarily mean that a government's 'requirements' towards minorities have changed.

My purpose in this thesis is to provide a comprehensive analysis, one which takes these points into account. I compare different levels of government policy in Great Britain, the Netherlands, Sweden and Denmark by analysing and exploring suggestions for practical actions in general and educational arrangements in particular. This will serve not only the purpose of the somewhat stagnant philosophical debate, but also that taking place in the public arena.

Significance of the thesis

This thesis is a contribution to the debate on cultural plurality and the place of religion within it. Its significance lies in four factors. First of all, it provides an analysis of government strategies at two levels, focusing on policies dealing with the management of cultural plurality in general and educational arrangement in particular; it thus contributes a perspective not yet provided in academic studies.

Secondly, I provide a detailed analysis of the main lines of documents dealing with the pluralistic nature of society and/or immigration policy. This can serve as a solid basis for more profound ethnographic analysis, in the search for a more nuanced picture of cultural plurality management policies. In the thesis I raise several questions to which documents do not give direct answers, along with ideas that would be interesting to investigate in depth.

Third, my conclusions concerning the empirical material provide useful data for further discussion as to the appropriate direction of multicultural policies and the (better) recognition of cultural diversity.

Finally, as mentioned earlier in this chapter, in Finland, the organisation of religious education is under constant academic and public debate. This book provides not only important data about the current trends with regard to RE in other European countries but also presents and analyses the reasons that have led to selected choices in these nations.

Outline of the thesis

In Chapter 2, 'Articulating national and regional identity', I explore the perception and articulation of the national self in politicians' statements and in policy documents dealing with the pluralistic nature of society and/or immigration policy in Great Britain, the Netherlands, Sweden, Denmark, the Council of Europe and the European Union. With regard to the four individual countries, my purpose is not only to find out how identity is articulated by politicians or policy makers, but also to analyse what is required of citizens in order to become 'respected' members of a given society. In addition, I explore the relationship between the definition of identity and the need to create a more cohesive society.

Chapter 3 is entitled 'Dealing with cultural diversity'. Here I trace how diversity policies are perceived by citizens, especially religious citizens. I first introduce and discuss the philosophical debate over group rights. I then establish a theoretical framework for the analysis of empirical data. This framework consists of three models for the recognition of cultural difference. Based on these models, I introduce two sets of framing questions. The first set of questions deals with the kinds of expectations societies have towards their citizens. The second set focuses on how the needs of minority groups have been and are currently recognised by governments. The empirical analysis is described at the end of this chapter.

Chapter 4, 'Social cohesion and education', discusses ways in which the goal of better cohesion is reflected in educational arrangements. I first describe how the subject 'religious education' is implemented in these four countries, after which I explore the recent criticism of faith schools. Finally, I describe the curricular changes made in order to achieve better cohesion.

In Chapter 5, 'Values education', the values and morality education of these countries are evaluated. Here I focus on three perspectives: explicitly stated values, desirable ethical attitudes, and the means and content of ethical reflection. My purpose is to find out (i) what kind of ethical attitude is cultivated in pupils, and (ii) to what extent they are encouraged to be autonomous in moral matters. This gives us a picture of the extent to which the way of life of the parents or other legal guardians is respected; or, from another perspective, to what degree the distinction between private and public values is maintained in education.

Chapter 6, 'Religious education in a multicultural society', focuses on the possibility and/or necessity of religious education in a multicultural society. I evaluate and discuss the international legislative framework in the light of relevant legal cases that set limits to religious education. In addition, I discuss the position of the Council of Europe and the United Nations concerning the appropriate content of religious education. These actors are free of a specific history of religious education, and thus in a sense represent a disinterested point of view in this matter, but at the same time are obligated to adhere maximally to the idea of the fair treatment of citizens.

Finally, in Chapter 7 I summarise and discuss my findings, and return to the main conclusions in the light of the research questions presented in this chapter.

Chapter 2

Articulating national and regional identity

Framing the research problems

In this chapter I focus on the process of (re)production of national and regional identity.¹ My main emphasis is on the question of how the national self is imagined and articulated in politicians' statements and in policy documents dealing with the pluralistic nature of society and/or immigration policy. Before introducing the specific research questions on which my enquiry is based, I need to explicate my theoretical position in approaching the rather complex concepts of 'national identity'.² First of all, I treat different articulations of the concept as cognitive constructions about reality. From a cognitive perspective, concepts such as ethnicity, race, nationhood and national identity are not regarded as "things *in* the world, but perspectives *on* the world – not ontological but epistemological realities" (Brubaker et al. 2004, 45; italics in original). In the case of this study, different perspectives on the world show us not only how politicians and members of advisory groups perceive or experience the reality, but also how they argue in favour of recognising and defining the nation and/or its identity in a certain way.

Secondly, the process of identification does not take place in isolation. As Brubaker and Cooper (2000, 14) write, "[h]ow one identifies oneself – and how one is identified by others – may vary greatly from context to context; self- and other-identification are fundamentally situational and contextual." In other words, identity is not something that 'is', but an matter

¹ I use parentheses with the prefix '*re*' because in a multicultural nation there is on the one hand a need to create a new identity that will accommodate people with different ethnic, cultural and religious backgrounds, on the other a need to maintain elements of the old identity. Thus the parentheses should be read as referring to both meanings: redefinition and definition.

² See e.g. Brubaker and Cooper (2000). The authors discuss at some length the different meanings of 'identity' as well as how the understanding of the concept has changed from the days when it was first introduced in the social sciences. The confusion around the concept has led Brubaker & Cooper (2000, 2-4) to speak of an 'identity crisis' in the social sciences. The use of the term in the social sciences also depends for instance on a particular scholar's commitment to a certain theoretical tradition (Brubaker & Cooper 2000, 6-8).

of *when, where, how* (Anttonen 2005, 103³). It is also an issue of *why*: in order to exist, cultural identity “requires a motivation, a purpose, and an argumentative goal” (Anttonen 2005, 103). In sum, we need to take into account the context in which the articulation takes place. As noted in the previous chapter, political documents can be read as answers or solutions to the problems that cultural diversity is believed to have caused. In this sense, the context is from the very beginning fundamentally different from texts that deal with other phenomena in a society – even though, on the surface, similar issues might seem to be at stake.

Acknowledging the political nature of the material, I take it as a hypothesis that constructions of identity are ideologically laden, in the sense that there is an implicit goal of overcoming diversity and standardising citizens (Anttonen 1996, 69⁴), at least to a certain degree. Documents can be treated as if they were part of the building process of a nation, in which the goal is to create unity among the manifold local and regional cultures within the borders of the state (Anttonen 1996, 69⁵). Articulations in the first person plural, ‘we’, refer to “a fundamental and consequential *sameness* among members of a group or category” (Brubaker & Cooper 2000, 7; italics in original) that is already believed to exist within the majority. This sameness can be understood objectively, as a sameness “in itself”, or subjectively, as an experienced, felt, or perceived sameness (Brubaker & Cooper 2000, 7). In this sense, sameness can also be viewed as providing a norm that dictates in what respect all citizens are expected to become similar.

There is one more important point to take into account with regard to the context in which the articulation of identity takes place. We can speak of two types of identification: self-identification and external identification – the latter referring to the identification and categorisation of oneself by others. Normally, identification is a two-way process: while people identify and categorise themselves, they also become identified by others. However, here the role of the state is unique, in that it has no equal counterpart in this process. As representatives of the citizens, politicians can use their power to explicate the nature of the state, in this case its identity. Brubaker & Cooper (2000, 15) argue that

the state monopolizes, or seeks to monopolize, not only legitimate physical force but also legitimate symbolic force, as Bourdieu puts it. This includes the power to name, to identify, to categorize, to state what is what and who is who.

³ Anttonen refers to Fryckman (1995, 6).

⁴ Anttonen refers to Robertson (1990, 49).

⁵ Anttonen refers to Hannerz & Löfgren (1992, 29).

To return to the main problems of this thesis, it can be argued that the process of identity formation or (re)articulation at this level is of particular importance because the state not only has the power to name and to state who is who (Brubaker & Cooper 2000, 15), but also has “the material and symbolic resources to impose the categories, classificatory schemes, and modes of social counting and accounting with which bureaucrats, judges, teachers, and doctors must work and to which non-state actors must refer” (Brubaker & Cooper 2000, 16). It is impossible to talk about a nation’s own self-understanding without considering its practical consequences, for example for educational policies.

It is also important to note that the articulation of national identity not only provides the means to know ‘who we are’ in the contemporary world (see Smith 1993, 17), but is fundamentally a statement as to who belongs to the community and is therefore entitled to make claims on it. Broadly speaking, we can say that communities identify themselves through their common features. As Benedict Anderson (1991) suggests, we can think of nations as ‘imagined communities’; although the members can never know all the other members, they share an identity based on a common factor, such as history, cultural practices, language, religion etc. In the case of multicultural nations, however, it has been argued that immigrants, even though they have equal legal status with the natives, do not fit this classical description of national identity. Normative stances have therefore been adopted in order to strip the national identity of its ethnic essence. According to this line of thought, the definition of identity should be replaced with a more accommodating notion (Williams 2003; Parekh 2000). For example Bhikhu Parekh (2000, 232) argues that “the national identity of a community should be so defined that it includes all its citizens and makes it possible for them to identify with it”; the definition should encompass all citizens as “equally valued and legitimate members of the community” (Parekh 2000, 233). One suggested solution is that a political community should be defined only by reference to a shared commitment to the core principles of a democratic society. This could be called ‘civic nationalism’ or ‘civic community’ (see Williams 2003, 210-211).

Another way to see the issue is to apply Smith’s (1993, 83) distinction between ‘ethnic-genealogical’ and ‘civic-territorial’ conceptions of nationalism. The former is about championing a shared ethnicity and a common genealogy (shared language, religion, history, customs, race) as prerequisites for membership in a national community, while the latter is about seeking to bring citizens together and integrate them into a new political community.

I examine policy documents and political statements in the light of three questions: (i) what kind of national identity is articulated; (ii) what are the factors that demarcate who does or does not fit this definition; and (iii) how is

a given construction of national identity used with the aim of increasing security and solidarity, or inversely, how in the name of security and solidarity are different elements of identity legitimated and others delegitimated? With regard to the first question my particular focus is on how sameness and difference are constructed, and on how differences between cultural groups are diminished or exaggerated. As Anttonen (2005, 103) writes, “the making of distinctions is argumentative by nature, as we have reasons for why difference makes a difference when it makes a difference”. Above I formulated the hypothesis that the context of the material implies an inherent goal of overcoming diversity and standardising citizens. I am interested, assuming that this is true, in the ways in which this takes place.

With regard to the second question, I map what is required of citizens in order for them to qualify as legitimate members of a society. I also look at how rigid or flexible these boundaries actually are. In particular, I identify the necessary characteristics expected of the individual citizen. As Parekh (2000, 231) writes,

[e]very long-established political community includes several different strands of thought and visions of the good life. Since every definition of national identity is necessarily selective and must be relatively simple to achieve its intended purposes, it stresses one of these strands and visions and delegitimizes or marginalizes other.

This quotation from Parekh is important because the boundaries of inclusion or exclusion are not always ones that can be objectively evaluated, such as language or culture. Rather, the relevant markers seem to involve the attitudes or beliefs that a person holds. My particular interest is in exploring the status and role of religious beliefs in the documents and statements examined.

The third question emerges from the notion that any discussion of national identity involves an important psychological dimension that needs to be taken into account. Some kind of bond is needed to bring co-nationals together. As Smith (1991, 11) argues, “nations must have a measure of common culture and a civic ideology, a set of common understandings and aspirations, sentiments and ideas, that bind the population together in their homeland”. Thus the elements that are articulated in documents should signify bonds of solidarity among members of communities (Smith 1991, 15). Walker Connor (1993, 376-377) stresses the importance of the psychological nature of that bond (in Triandafyllidou 1998, 597.)

In the following, I present and discuss policy documents and political statements from Britain, the Netherlands, Sweden and Denmark. I then consider the issue of European identity.

Great Britain and the (re)production of national identity between 1997 and 2007⁶

In 1997 the Labour Party, the so-called New Labour, won the general elections. In its first years of power the Labour government showed an interest in embracing ethnic diversity and valuing a cultural mix (see e.g. Abbas 2005; Back & al. 2002, 446). One example of this was the granting of public funding to two Muslim schools that had previously been denied the grant (see e.g. Walford 2003, 282-283).

Under Labour governance the question of national identity was incorporated in the political agenda several times; it has been a central element in discussions of citizenship and of how to deal with cultural diversity and ethnic relations. The importance of a coherent view of national identity was stressed in the report *Education for citizenship and the teaching of democracy in schools* (1998) (better known as the Crick Report). The report was the outcome of the Advisory Group on Citizenship, established by the Secretary of State for Education, David Blunkett. The report refers to “the increasingly complex nature of our society, the greater cultural diversity and the *apparent loss of a value consensus*” (QCA 1998, 17 par 3.13; italics added). Furthermore, it is stated that “‘cultural diversity’ raises the issue of national identity” (QCA 1998, 17 par 3.13). As a solution, the report suggests that a sense of common citizenship should be cultivated in citizens:

[r]esponding to the worries, a main aim for the whole community should be to find or restore a sense of common citizenship, including a national identity that is secure enough to find a place in the plurality of nations, cultures, ethnic identities and religions long found in the United Kingdom (QCA 1998, 17 par 3.14).⁷

There are two interesting points about this extract. First, there is no clear

⁶ In the previous chapter, I pointed out that due to Britain’s colonial history it has been acquainted with diversity for centuries. However, although Britain has also received immigrants for centuries, the country has traditionally been a net population exporter. It was only in the mid-1980s that the United Kingdom became a country of immigration. Today, around 9 % of the population is non-white. (Somerville et al. 2009.)

⁷ To formalise central ideas of the document in the form of argument presented in the previous chapter, the argument looks like as follows: P1: There is increased complexity in the society due to cultural diversity (QCA 1998, 17 par 3.13). P2: The situation is perceived with anxiety: “Responding to the worries, a main aim for the whole community should be to find or restore a sense of common citizenship” (ibid, 17 par 3.14). P3: One problem within the British society is a loss a value consensus. There are also “worrying levels of apathy, ignorance and cynicism about public life” (ibid, 8 par 1.5). P4: One reason for this is inadequate educational arrangements (ibid, 7 par 1.1). P5: A goal is to foster a common sense of citizenship and create “a national identity that is secure to find a place in the plurality of nations, cultures, ethnic identities and religions long found in the United Kingdom” (ibid, 17 par 3.14). Conclusion: There ought to be uniform and “systematic approach to citizenship education” (ibid, 7 par 1.4).

vision as to what the current national identity actually is. Indeed, identity is presented as something that is still evolving. Secondly, a connection is seen between the current situation and a lack of a sense of cohesion among citizens. It is also interesting that while the report stresses that citizens have certain responsibilities, it simultaneously makes a distinction between ‘us’ and ‘others’:

Majorities must respect, understand and tolerate minorities and minorities must learn and respect the laws, codes and conventions as much as the majority – not merely because it is useful to do so, but because this process helps foster common citizenship (QCA 1998, 17-18 par 3.16).

It is quite clearly stated that it is minorities (‘the others’) that have problems with respecting the basic principles of British society. The document, however, does not say which particular minorities are involved and in what respect these problems have arisen.

The extract highlights the importance of society’s norms, including laws, codes and conventions, as essential ingredients of common citizenship. Here we find a similarity to Rawls’ idea of the reasonable citizen: “[t]he reasonable is an element of the idea of society as a system of fair co-operation. ... Reasonable persons ... desire for its own sake a social world in which they, as free and equal, can cooperate with others on terms all can accept.” (Rawls 1993, 49-50.)

It was via the Runnymede Trust Commission’s report, *The Future of Multi-Ethnic Britain* (2000), that the issue of national identity became a matter of public dispute. In the chapter ‘Rethinking the National Story’, the writers ask: “[w]hat is Britain’s understanding of itself?”, and whether ‘Britishness’, as previously understood, has a future. They also argue that the concept of identity is controversial – “Britain seems incapable of shaking off its imperialist identity” – and adopt a normative stance in favour of a more accommodating vision: “Genuinely multicultural Britain urgently needs to re-imagine itself” (Runnymede Trust 2000, 38). The sentence most widely quoted and discussed in the media was “Britishness, as much as Englishness, has systematic, largely unspoken, racial connotations” (Abbas 2005, 158-159; Back et al. 2002, 447).

The time when the report was published is now seen as the heyday of British multicultural policy in its celebration of diversity, but this era only lasted a short time. The change began with the civil unrest of the summer of 2001 in the northern cities of Britain, and the attacks of September 11. These incidents foregrounded the idea of strengthening community cohesion. (See e.g. Abbas 2005 159; Back et al. 2002, 446; Joppke 2004, 249-250.)

The phrase ‘community cohesion’ appears in the Cattle report, *Community Cohesion: A Report of the Independent Review Team chaired by Ted Cattle* (2001), which was a result of the government-commissioned

investigation of the riots. The review team consisted of a group of politicians, social workers and local government experts with strong ‘minority’ credentials. The report argues that there is a need for a greater sense of citizenship (Home Office 2001, 10 par 2.13) and that common elements of ‘nationhood’ need to be clarified and agreed upon (Home Office 2001, 19 par 5.1.7). The suggested key issues around which identity can be built were language and law.

The report also argues that there is no going back to a “monoculturalist view of nationality” (Home Office 2001, 18 par 5.1.4). The writers thus recognise the existence of a perception of identity, which has now proved to be problematic. Similarly to the view in Crick report, the new identity is considered to be still evolving.

The main point of the report lies in the emphasis placed on the importance of sharing common principles:

[M]any of the present problems seem to owe a great deal to the failure to communicate and agree a set of clear values that can govern behaviour. This failure is evident at both the national and local levels, and it has led to community breakdown in some parts of the country, due to particular circumstances or triggers. (Home Office 2001, 18 par 5.1.1.)

According to the report, it is the increased cultural plurality due to mass immigration that has created problems in the area of common norms and values. When the report was published, Home Secretary David Blunkett (cited in Joppke 2004, 251) stated: “We have norms of acceptability and those who come into our home – for that is what it is – should accept these norms.” Interestingly, in this document too a distinction is made between ‘us’ and ‘others’, in this case between ‘white’ and ‘non-white’ communities. It is made clear that both ‘communities’ need to revise their attitudes and change their behaviour. (Home Office 2001, 19 par 5.1.9.)⁸

⁸ To formalise the document in the mode of argument set down in the previous chapter, the argument looks as follows: P1: There is polarisation in towns and cities. “[M]any communities operate on the basis of a series of parallel lives.” One example of this is education arrangements. (Home Office 2001, 9 par 2.1.) P2: The Community Cohesion Review Team “was struck by the depth of polarisation” (ibid, 9 par 2.1). P3: Along with segregation, the problem is that “ignorance about each others’ communities can easily grow into fear; especially where this is exploited by extremist groups determined to undermine community harmony and foster divisions” (ibid, 9 par 2.3). P4: “[T]here has been little attempt to develop clear values which focus on what it means to be a citizen of a modern multi-racial Britain and many still look backwards to some supposedly halcyon days of a mono-cultural society, or alternatively look to their country of origin for some form of identity” (ibid, 9 par 2.6). Many of the problems owe to a great deal to the failure to communicate and agree a set of clear values that can govern citizens’ behaviour (ibid, 18 par 5.1.1). P5: The goal is to promote community cohesion, “based upon a greater knowledge of, contact between, and respect for, the various cultures that now make Great Britain such a rich and diverse nation” (ibid, 10 par 2.12) and create understanding that

The idea of core values as at the heart of national identity, and of the non-ethnic essence of identity, is even more explicit in the government's White Paper, *Secure Borders, Safe Haven: Integration with Diversity in Modern Britain* (2002). The document claims that Britain has been a multi-ethnic nation for centuries and that "society is based on cultural difference, rather than assimilation to a prevailing monoculture" (Home Office 2002, 10 par 5). It also maintains that "British nationality has never been associated with membership of a particular ethnic group". The current situation, however, gives rise to anxiety; the Government recognises that migration poses a challenge "to our concepts of national identity and citizenship" (Home Office 2002, 9 par 4). In addition, it is acknowledged that the integration of immigrants has failed and that the society has become subdivided into various groups. Thus there is an urgent need for actions that will bind citizens together:

The reports into last summer's disturbances in Bradford, Oldham and Burnley painted a vivid picture of fractured and divided communities, lacking a sense of common values or shared civic identity to unite around (Home Office 2002, 10 par 6).

The remedy, as in the Crick Report and the Cattle Report, is seen as a commitment to common values. Simultaneously, a plea is made for a stronger notion of citizenship:

To *ensure social integration* and cohesion in the UK, we need to develop a stronger understanding of what citizenship really means. Historically, the UK has had a relatively weak sense of what active citizenship should entail. Our values of individual freedom, the protection of liberty and respect for difference, have not been accompanied by a strong, shared understanding of the civic realm. (Home Office 2002, 10-11 par 8; italics added.)

In the chapter entitled 'Citizenship and nationality' the ideas of commonly shared values and citizenship are treated with more detail. It is written that "[w]e need to develop a sense of *civic identity* and shared values" (Home Office 2002, 32 par 2.11; italics added). These shared values can be derived from the Human Rights Act (Home Office 2002, 30 par 2.3). However, other values as well as virtues are also mentioned as a basis of British citizenship, namely democratic values, faithful observance of laws and fulfilling duties and obligations (Home Office 2002, 34 par 2.21).

As far as citizenship is concerned, the government wants it to be as inclusive as possible:

both white and non-white communities will need to change both attitudes and behaviour (ibid, 19 par 5.1.9).

Common citizenship is not about cultural uniformity, nor is it born out of some narrow and out-dated view of what it means to be 'British'. The Government welcomes the richness of the cultural diversity which immigrants have brought to the UK – our society is multi-cultural, and is shaped by its diverse peoples. We want British citizenship positively to embrace the diversity of background, culture and faiths that is one of the hallmarks of Britain in the 21st Century. (Home Office 2002, 29 par 2.2.)

One important point to note is that although the White Paper speaks of values that should apply in the public sphere (civic realm, civic identity), it is suggested that they should apply in the private sphere as well: “[i]t will sometimes be necessary to confront some cultural practices which conflict with these basic values – such as those which deny women the right to participate as equal citizens” (Home Office 2002, 30 par 2.3).⁹

Before summarising my main findings about these documents, I examine the views on national identity of two politicians, David Blunkett and Gordon Brown. In a speech entitled ‘A New England: An English Identity within Britain’, delivered at the Institute for Public Policy Research (14 March 2005), Blunkett asks where, in a situation of diversity, a shared sense of identity can be found. His answer is fairly well in line with what we have already seen:

Britishness is defined not on ethnic and exclusive grounds – but through our shared values, our history of tolerance, of openness and internationalism, our commitment to democracy and liberty, to civic duty and the public space (Blunkett 2005, 4).

In one of his speeches, Gordon Brown is more precise. He speaks of British

⁹ The argumentative structure of the White Paper goes as follows: P1: In recent years, the changes associated with globalisation have led to greater complexity in the society (Home Office 2002, 9 par 2). P2: Migration brings huge benefits, but can also raise tensions unless properly understood and well managed (ibid, 9 par 3). P3: “[W]e have failed. The reports into last summer’s disturbances in Bradford, Oldham and Burnley painted a vivid picture of fractured and divided communities, lacking a sense of common values or shared civic identity to unite around” (ibid, 10 par 6; see also 22 par 1.7). P4: One reason for the failure is that “[h]istorically, the UK has had a relatively weak sense of what active citizenship should entail” (Home Office 2002, 10 par 8). P5: In order to correct the situation “the social fabric of our communities” should be fostered and renewed as well as “a sense of common citizenship, which embraces the different and diverse experiences of today’s Britain” should be rebuilt (ibid, 10 par 6). Conclusion: The Government shall take initiatives to organise “an open and constructive debate about citizenship, civic identity and shared values.” This is viewed as the basis for “bringing together people of different races, cultures and religions in a cohesive society.” (Ibid, 10 par 7.) As concrete actions, new citizens are offered language teaching and education for citizenship. Among others effects, this will strengthen the bonds of mutual understanding between people of diverse cultural backgrounds. (Ibid, 11 par 9.)

values:

I think the days of Britain having to apologise for our history are over. I think we should move forward. I think we should celebrate much of our past rather than apologise for it and we should talk, rightly so, about British values.

We can find common qualities and common values that have made Britain the country it is. (BBC 2005.)

Both politicians find a certain consistency among the majority; in other words, the majority share the core values of the society. According to them, it is this consistency around which the British identity is and should be constructed.

To sum up the material presented above: while it is clear that a definition of national identity cannot be based on ethnic construction, it is unclear how explicitly national identity should be understood (first question). However, what seems to be a common denominator is that citizens should agree on certain values. These values are derived from legal and/or human rights standards.

With regard to those who do not fit the definition (second question), it is apparently the attitudes and values of citizens that serve as a designator. No one is excluded because of race or ethnic origin, but rather because he or she does not respect those values. Thus belonging or not belonging to a community is not necessarily a permanent state. One's origins cannot be changed, but it is believed that one's ways of thinking can.

What, then, can be said as to national identity in relation to the need to increase security and solidarity (third question)? In the documents discussed here, plurality is welcomed but is simultaneously seen as a source of anxiety. The importance of an internalisation of core values is also evident in the process of increasing security and creating community cohesion. Insecurity, on the other hand, is regarded as the result of a lack of commonly shared values. It is illuminating to compare this attitude to the Labour government's definition of society's values in 1998, before the riots in northern England and the rise of political Islam. As already noted, the end of the twentieth century is regarded as a time of embracing ethnic diversity and valuing a cultural mix. In *The Government's Annual Report 97/98*, important values referred to were "decency, social justice, reward for hard work, the importance of *strong communities* and families, and rights being matched with responsibilities" (Her Majesty's Government 1998, 9; cited in Starkey 2000, 51; italics added). After the riots and September 11, the idea of commitment to strong sub-communities has been replaced with the idea of a single strong community, with core values shared by everyone.

Since the role of common values is seen as so vital, it is somewhat odd that no mention is made of exactly which values are in conflict with these; not to mention whose values or which group's. Conflicts among citizens in the sphere of values are referred to with an example only two times. The Crick Report states that "minorities must learn and respect the laws, codes and conventions *as much as the majority*" (QCA 1998, 17-18 par 3.16; italics added). In *Secure Borders, Safe Haven* it says that "[i]t will sometimes be necessary to confront some cultural practices which conflict with these basic values – such as those which deny women the right to participate as equal citizens" (Home Office 2002, 30 par 2.3). What is interesting is that the latter quotation refers to *cultural* practices that cause conflicts. It is worth asking: what is the status of society's values? One possible interpretation – this is a hypothesis – is that society's values are regarded as being neutral and secular; in other words, they are not cultural in the same sense as the values of various sub-groups. Referring explicitly to neutrality would undoubtedly be a better way (philosophically) to persuade those who do not currently respect these values to adopt them than admitting that these too are culturally driven.

It is also worth asking whether it is enough for society's basic values to be accepted merely for political purposes, as for instance Rawls' theory suggests. I return to this topic in connection with the identity articulation of the Netherlands, and again in the Discussion section of this chapter.

The Netherlands

The Netherlands, like Britain, is a multicultural nation, with a history, since the beginning of the 1960s, of accommodating great numbers of immigrants. According to an estimate by the Netherlands Central Bureau for Statistics (Central Bureau voor de Statistiek), in 2010 some 20% of the population had a foreign background (Statline 2010). Approximately 5% came from other EU countries (Migration Policy Institute 2011). The main immigrant groups are Turks, Moroccans, Surinamese and Antilleans (Migration Policy Institute 2011).

Before the 1990s, the official Dutch policy with regard to cultural diversity was a kind of communitarian pluralism, the official slogan being "integration while preserving one's own [i.e. the immigrants'] identity" (Karsten 2006, 27-28; see also Vasta 2007, 716-717; Joppke 2004, 247-248). The Dutch history of embracing diversity goes back as far as the beginning of the twentieth century. The Dutch system, known as 'pillarization', has been a unique arrangement in the European context: different societal sub-groups each had their own state-sponsored and semi-autonomous institutions for health care, social welfare, education etc. Thus it is fair to say that the Netherlands has had a multicultural identity long before the start of the most recent wave of immigration. There is a strong legal foundation for the arrangement, since it is laid down in the Constitution.

While the system of pillarization gradually ended during the second half of the twentieth century, its most distinctive feature, that of establishing a ‘community of communities’, can still be seen for example in the educational system, where the private sector, including schools with a religious profile, is large and completely funded by the state.

Reararticulating identity by polarising Dutch and Islamic values

Due to mass immigration, this system of multiple ‘sub-societies’ within a larger encompassing society has proved to be problematic. It is the incommensurability of Western values with certain religious beliefs and practices that has been one of the main triggers of the debate over the significance of immigration. Han Enzinger (2006, 132) notes that many public and parliamentary debates focus specifically on religion. It is no exaggeration to say that the main source of the problem has been the presence of Islam. Ellie Vasta (2007, 714) calls this “a schism between immigrant Muslims and the native ‘Dutch’ over basic democratic values such as freedom of speech and the position of women in Muslim communities”.

In the political sphere the criticism of Islamic values first emerged in 1991, when the parliamentary Liberal Party started questioning the success of the multicultural policy; the party asserted that the Netherlands should not accommodate certain practices carried out in the name of religion. While tolerance is one of the major values in the Dutch society, it should not be extended to intolerance. Since 2001 such criticism has increased. (Karsten 2006, 28.)

What, then, are the issues that have caused criticism? According to Enzinger (2006, 132), the parliamentary debate has focused on genital mutilation, honour killings, incitement to jihad and terrorism. He reminds us that these practices are not really widespread among Muslims in the Netherlands. Another topic that has given rise to criticism in public is gender inequality, which according to Anna Korteweg (2006) is the frame within which differences in ethnicity, civic values and religion have mostly been discussed.

As far as gender equality is concerned, there is at least one government document dealing with the disadvantaged position of Muslim women. The survey by the Social and Cultural Planning Office (SCP) was published in 2003. It stated that more than half (53 %) of ethnic-minority women face disadvantages. The women in question were predominantly Muslim (Turkish or Moroccan), but a relatively large number of single mothers of Surinamese and Antillean descent also fell into this category. Most of them were unemployed, poorly educated and economically dependent. According to Aart Jan de Geus, the Minister for Social Affairs and Employment, these findings confirm the view that emancipation and integration should be high on the government’s list of priorities. (Government of the Netherlands

2004a.)

In 2004 the Dutch government argued that since the Netherlands is home to citizens with different value systems, a few basic values needed to be shared by all. The basic values mentioned were derived from the Constitution and from international Conventions; they included equality of treatment, freedom of religion, freedom of speech and association, respect for privacy, and the right to inviolability of one's person. (Government of the Netherlands 2004b.)

In 2009 the government declared that those aspects of Islamic law (Sharia) which involve compulsion, pressure and abuse of power are inconsistent with Dutch law. In particular those aspects that deal with differences between men and women, along with divorce laws, conflict with the key values of Dutch society. According to Justice Minister Ernst Hirsch Ballin,

[t]he cabinet's job is to ensure that the Netherlands does not develop a parallel society in which people take the law into their own hands or maintain their own legal system which operates outside the framework of our own legal system. (Dutch News 2009.)

This quotation suggests the existence of (at least) two possible scenarios for the future. The undesirable alternative is a society divided into sub-groups, each with its own values; the other, desirable one is a more cohesive society, where everyone follows certain basic rules and norms. It is important to note that the current situation is perceived as being located somewhere between these two alternatives. It can potentially lead to either outcome; thus it is all about what actions are taken in the near future.

Some aspects of the polarisation between Dutch and Islamic values and practices

In relation to the articulation of national identity in Britain, I noted above that the question remains open as to what or which groups' values are in conflict with the core values of the society. In the British documents explored here, there is only one reference to "certain cultural practices" which deny "women the right to participate as equal citizens" (Home Office 2002, 30 par 2.3). As I have shown, in the case of the Netherlands the main conflict is between the democratic values of native Dutch people and certain values and practices characteristic of Islam.

In an article entitled 'Multiculturalism, pillarization and liberal civic education in the Netherlands' (2001), Ben Spiecker and Jan Steutel have

analysed differences among the Dutch and Islamic cultures.¹⁰ They argue that although the system of pillarization was designed to cherish group cultures, members of all groups strongly identified with the Christian-Humanistic tradition, sharing the same historical narratives and collective experiences and using the same language (Spiecker & Steutel 2001, 296-297). The point is that there existed a sort of national culture, 'a shared roof', to use the expression of Spiecker and Steutel. With Muslim immigrants, however, the case is different, since they have brought with them Islamic conceptions of government, law, marriage, and family life. Therefore those who want to maintain these Islamic ideas "do not and cannot share the same roof" with the majority. According to Spiecker and Steutel (2001, 299) "the most intense cultural conflicts relate to inconsistencies between the rules and values of Islamic family life and the typical western laws of Dutch society."

It is worth considering this issue in the light of Rawls' theory of the 'reasonable citizen'. According to Rawls, as already observed, citizens whom we can term 'reasonable' can hold whatever beliefs they wish in private, as long as they are willing to affirm the supreme political authority of liberal principles in public. Now, Spiecker and Steutel give an example of the inconsistency between the Western and Islamic ways of life by referring to the values and norms that Muslims hold in private. From the perspective of a Rawlsian just society, all Muslims should affirm the supreme authority of liberal principles. The question we need to ask is this: if, for the sake of argument, all Muslims accepted democratic Dutch values in the name of peaceful co-existence among citizens, for instance for prudential reasons,¹¹ but still held Islamic values in private, would this be satisfactory in the eyes of the politicians who represent the opinion of the majority? If the answer were in the negative, this would mean that the idealistic distinction between public and private is not that easy to apply in the eyes of the majority. I return to this issue later in this chapter.

Getting back to differences between the Dutch and Islamic cultures, the two cultures also vary considerably with regard to the status of a member of a given cultural group. To clarify the point: we need to consider the differences between individualistic and collectivistic cultures. One shared characteristic of individualistic cultures is that "people's social behaviour is largely

¹⁰ With regard to Dutch culture, the writers speak of the "dominant ideology of a nation" and the "ideological cement of the nation" (Spiecker & Steutel 2001, 293). They also comment that in a nation-state, "its population, or at least the vast majority of its inhabitants, shares a common culture, which may be called a national culture" (ibid, 296).

¹¹ See Tamir's (1995, 170) discussion of the conditions on which illiberal cultures would accept liberal ideals: "illiberal cultures do not have the theoretical foundations that would allow them to pay genuine respect to liberal ones". They feel that "they have been forced to join a liberal game, which places liberal values" on them. However, they might accept a compromise, a second-best solution, if the only real alternative is worse. But, Tamir stresses, this would happen "merely out of necessity as their own principles do not leave room for a more fundamental type of concession".

determined by personal goals that often only slightly overlap with the goals of collectives, like the family, the work group, coreligionists, fellow countrymen and the state” (Spiecker and Steutel 2001, 297). In collectivistic cultures, in contrast, a social behaviour is “determined by goals shared with the collective” and “giving precedence to collective values over individualistic ones is considered highly desirable”. Defining which values are important for each type of culture, Spiecker and Steutel cite Harry C. Triandis (1990, 68):

For collectivists, social order, self-discipline, social recognition, humility, honouring parents and elders, accepting my position in life, and preserving my public image. For individuals, equality, freedom, an exciting life, a varied life, and enjoyment.

Maintaining a focus on these notions, Spiecker and Steutel (2001, 297-298) argue that in the heyday of pillarization Dutch culture was actually quite collectivistic, but that the ongoing individualisation of society has been one major reason for de-pillarization.

Articulation of national identity in public debate and policy documents

Thus far I have examined political discourse on the subject of immigration. The need for a comprehensive definition of national identity became a publicly disputed issue in the Netherlands in 2007, when the Argentine-born princess Máxima, wife of Crown Prince Willem Alexander, said at the publication of a report about identifying with the Netherlands that there is actually no such thing as a Dutch identity:

My search for the Dutch identity began around seven years ago. I had the help of dozens of generous and wise experts. But a Dutch identity? No, I didn't find one. The Netherlands is large windows without curtains so that everybody can look in but also the right to privacy and being cosy. ... The Netherlands is too complex to sum up in one cliché. (Crossroads 2007; Radio Netherlands 2007.)

This statement aroused serious criticism from intellectuals, for example Paul Scheffer, as well as politicians, such as Geert Wilders, leader of the nationalist Party for Freedom, and Ruud Lubbers, former Dutch prime minister and ex-UN High Commissioner for Refugees. While Scheffer argued that the underlying assumption of a world citizen is unrealistic, Lubbers was of the opinion that there is a Dutch identity since “no one would fail to recognize a Dutch person when they meet one”. He admitted that Dutch identity is continually developing and being refined. (Crossroads 2007; Radio Netherlands 2007.)

Eventually, the government had to comment on the Princess's statement.

Integration Minister Ella Vogelaar, Justice Minister Ernst Hirsch Ballin and Prime Minister Jan Peter Balkenende had in fact approved the speech, and the cabinet took complete responsibility for the text. In the words of Minister Vogelaar:

I understood the speech as saying that a single Dutch identity doesn't exist but that doesn't mean that we don't have a number of characteristics in common. The Dutch identity isn't static. We're now in a phase of trying to find out exactly what Dutch identity is. (Crossroads 2007; Radio Netherlands 2007.)

This episode relating to national identity took place in a totally different context from the debates described above. Although this discourse too is about who is a legitimate member of society, it is free of any pressure to provide concrete solutions; in other words to find a sameness that would easily divide citizens between 'us' and 'them', as in the case of statements dealing with the presence of Muslims in Dutch society. Thus it is no surprise that the ministers' answer is as accommodating as possible. No borders are drawn as markers of either inclusion or exclusion.

The issue of national identity was also treated explicitly in 2007 in the report *Identification with the Netherlands (Identificatie met Nederland)* (2007) by the Scientific Council for Government Policy, WWR (Wetenschappelijke Raad voor het Regeringsbeleid).¹² According to the WWR report,¹³ the question of national identity is currently an important issue because of the multicultural nature of Dutch society. The underlying concern is that immigrants and their children, as well as some native Dutch, do not always feel at home in the Netherlands. (WWR 2007, 11.) There is also a fear that cultural diversity may weaken the sense of trust between groups, as well as in the society as a whole. According to the report, there are two main problems: Islamic fundamentalism, and the far right's response to the presence of immigrants. (WWR 2007, 14.)

The report stresses the urgent need for a strong, clearly articulated sense of national identity (WWR 2007, 11). In comparison to the statements by politicians, it is interesting to see that the report strongly questions the current trend of dividing citizens into two camps, with unrealistic expectations placed on one of them while the other can remain more or less as it is:

¹² The WWR is a strong voice in the Netherlands, and its work has influenced Dutch government policies over the last decades. In one of its previous reports, published in 1979, the WWR for example categorised immigrants as a group of ethnic minorities. This laid the ground for the 1983 government policy on immigrants and ethnic minorities, calling for the protection of minority identities. The principle of preserving the native language of immigrants was also recommended by the WWR. (Entzinger 2003.)

¹³ The quotations from the document have been translated by Anna Korteweg (see Korteweg 2008).

The story of ‘the’ unifying/unified Dutch national identity confirms and strengthens an undesirable and too simplistic distinction between established residents and newcomers, autochthones [native Dutch] and allochthones [immigrants]. Allochthones as a group are defined in terms of what they are *not*: not from here. At the same time, the demand is that they become *completely* Dutch. However, if we keep holding onto a historical description of being Dutch, they will never succeed in that. (WWR 2007, 17; italics in original.)

The report suggests functional identification, in which the starting premise is that “people are no longer seen primarily as members of an ethnic group but as individuals with widely varying functional ties” (WWR 2007, 14). In the next chapter I present three theoretical models for the treatment of difference in a culturally plural society. The point of the WWR solution is that real opportunities should be created for expanding and revising the civil sphere through interaction among groups, and of course among individuals.

With regard to the core values that provide a framework for civic co-operation, the report stresses that all citizens should adopt these values unconditionally; at the same time, however, it maintains that the discursive universe within which the debate over values occurs should be widened:

Not everybody has an equal say in this process [of modifying norms]. ... It is important that minority groups and individuals can promote norms, because the one-sided focus in policy and public debate on adjusting to [existing] norms can be counterproductive.¹⁴ (WWR 2007, 15.)

According to the report, the role of government policy is considered to be of special importance in this process; thus the Dutch government should ensure that the media as well as politicians themselves clearly represent a diversity of viewpoints (WWR 2007, 16).

To return to the questions formulated in the introduction to this chapter: the first conclusion to be drawn is that in the Netherlands, as in Britain, the national identity articulated in policy documents and by politicians is not strongly based on ethnic construction.¹⁵ Rather than asserting what actually constitutes the Dutch national identity, it is easier to focus on what it is not. From the material analysed, we can conclude that, as in Britain, identity is not regarded as fixed. The political debate triggered by the presence of Islam, however, suggests that at the heart of national identity are values. Values are

¹⁴ The report gives no concrete examples of what values are negotiable.

¹⁵ Korteweg (2008, 10) and Entzinger (2006) disagree with this conclusion. According to them, being Dutch is starting to look more like an ethnic construct because of increasing assertions of a need for linguistic and cultural homogeneity both in the media and the government.

a necessary ingredient of national identity. In this sense, the question of who fits this definition is quite easy to answer. Immigrants are expected to adopt the core values of society, and to act and behave in their daily practices accordingly. The marker of demarcation is the attitude of a citizen. As Enzinger (2006, 132) argues:

[m]ore than before, immigrant integration appears to be defined in terms of loyalty to and identification with “Dutch values and norms”, rather than in terms of their social and institutional participation.

With regard to the third question, the psychological dimension of identity, citizens’ attitudes towards the society’s core values play an essential role. As in the case of Britain, values are believed to play an important role in creating cohesion among citizens. Furthermore, since the presence of certain Islamic values and practices is seen as a threat to social order and is believed to lead to segregation, it is plausible to infer that core values are expected to be adopted as personally binding, not only in public and for the sake of expediency but in private as well.

Sweden

I have argued that in both Britain and the Netherlands the society’s core values play a central role in forming the non-negotiable core of the national identity. Values also form an essential element in attempts to promote social cohesion and create a sense of security among citizens. In this sense, the case of Sweden is similar. With regard to the process of defining national identity, on the other hand, Sweden differs in two ways from Britain and the Netherlands. First, the debate over values took place over a decade before them, and secondly, preserving national cultural heritage that also includes religion (Evangelic Lutheran), has had a salient role in Sweden’s immigration policy in the mid-1990s.

Sweden, like Britain and the Netherlands, has been open to immigration for decades. From 1945 until the early 1970s most immigrants were labour immigrants from other Nordic countries and from southern Europe. After the early seventies labour immigration declined and refugee immigration began. (Graham 1999, 27.) Immigration reform took place in 1985, causing an increase in the number of refugees from five thousand refugees annually to fourteen thousand (Graham 1999, 35). Since then a growing number of Middle-Eastern refugees has arrived in Sweden from Eastern Turkey, Lebanon, Syria, Iraq, and Iran. In the early 1990s there was also a large influx of refugees from the former Yugoslavia. (Graham 1999, 27.)

In 1986 the Swedish Government produced a White Paper *The government bill on immigration policy (Regeringens proposition om invandrapolitiken)*, stating that the official principle laid in 1975, namely

cultural ‘freedom of choice’, was problematic; it needed to be clarified and made more precise.¹⁶ According to the White Paper, it was unclear to some immigrants what laws and rules of conduct were valid in Sweden. In some cases, for example, ‘freedom of choice’ was interpreted as permitting forms of education for immigrant children that inculcated values deviating sharply from basic Swedish ways of thinking (*grundsyn*), as expressed in laws and political decisions (see Riksdagen 1986); it was also interpreted as conferring the right to practice female circumcision and child marriage (see Riksdagen 1991a, 80).

The Swedish Parliament made it clear that there were “basic values for which there is political unity” and that these formed the framework within which ‘cultural freedom of choice’ could be practiced. The possibility of endorsing customs, norms, values and practices “that conflict with Swedish law” was thus ruled out. The important values explicitly stated in the White Paper included democracy, gender equality and children’s rights. (Riksdagen 1986, 20.)

The White Paper also deals with the question of the multicultural identity of Sweden. It is written that according to the previous White Paper on immigration policy (adopted in 1975), “Sweden is on its way to becoming a multicultural society, and this is to be seen as a positive development”. However, it is acknowledged that during the last decade the society has become more ethnically diverse and new cultural patterns have been established. (Riksdagen 1986, 15.) The document also states that the development of Sweden in the direction of a multicultural society will inevitably involve difficulties and even the danger of conflict (Riksdagen 1986, 17).¹⁷ In 1996, another government report, *Sweden: Future and Diversity (Sverige: Framtiden och Mångfalden)* (1996) recognises that Sweden is an “unavoidably multicultural society” (SOU 1996:55; in Sojininen 1999, 692).

¹⁶ Freedom of choice was one of the three objects established as the bedrock of immigration policy in 1975. I return to this in Chapter 3.

¹⁷ The argumentative structure of the White Paper goes as follows: P1: Swedish society has become more ethnically plural and new cultural patterns have been established (Riksdagen 1986, 15). P2: In a society where different groups live side by side ethnic conflicts are a latent danger (ibid, 21). One goal of the earlier immigration policy, namely ‘freedom of choice’, is now seen as problematic, as it is unclear to some immigrants what laws and rules of conduct are valid in Sweden. P3 & P4: Freedom of choice has been misinterpreted, by some immigrants, as permitting practices that actually deviate strongly from the basic principles expressed in Swedish legislation and political decisions. On the other hand, minorities face discrimination and intolerance. (Ibid, 20.) P5: There is a need to create good ethnic relations and real opportunities to develop one’s own cultural heritage as well as to increase communication among people with different cultural backgrounds. This should take place within the framework of the basic principles of Swedish society. (Ibid, 18; 21.)

The next government report, issued in 1990 under the title *Active refugee and immigration policy (Aktiv flyktning och immigrationspolitik)* declares that it is no longer easy to define what is specifically Swedish. Interestingly, the document recognises that a national identity includes a normative side, with possible negative effects on those who do not belong to the majority since it easily regulates right and wrong, sharpens contradictions, and introduces distinctions between ‘us’ and ‘them’. This in turn may lead to a situation in which ethnic communities start to protect themselves from majority pressure “by building cultural defences against the outside world.” Simultaneously the report points out that many Swedes would themselves feel uncomfortable if they were forced to adopt what can be called ‘normal Swedishness’. In this sense, it is seen as both difficult and inappropriate to enunciate any specific ‘non-negotiable’ Swedish values.¹⁸ Interestingly, according to the document, the negotiation of ‘cultural values’ is welcomed “since these values are not once and for all”. (Riksdagen 1991a, 83.) In this sense cultural values are regarded as contingent, and certainly as being changeable.

In 1998, Swedish immigration policy was transformed into a policy of integration. According to the parliamentary White Paper, *Sweden, the future and diversity: from immigration policy to integration policy (Sverige, framtiden och mångfalden – från invandrarpolitik till integrationspolitik)* the former principle of immigration policy, freedom of choice, had been created in part as a specific policy for ethnic groups. However, this policy reinforced the division of the population into ‘us’ and ‘them’, thereby contributing to the sense of alienation that many immigrants and their children experience in Swedish society. Simultaneously, many citizens belonging to the majority saw this arrangement as a threat to the Swedish national character. (Riksdagen 1997, 18.) An important objective of the new integration policy was to safeguard basic democratic values and to promote equal rights and opportunities for women and men (Riksdagen 1997, 21).¹⁹

One important point to note is that while cultural plurality is seen in the White Paper *Sweden future and diversity (Sverige framtiden och mångfalden)* (1996) as “a question for society, not an immigrant question” (SOU 1996:55, 72; in Graham 1999, 119), a distinction is nevertheless made between the national culture and immigrant cultures. While it is recognised that in the course of history cultures cannot remain intact or unchanged (SOU 1996:55, 354; in Graham, 120), it is argued that the state has a “historical responsibility to safeguard the Swedish cultural heritage” (SOU 1996:55,

¹⁸ However, it is also stated that Swedish legislation places clear limits on human interaction (Riksdagen 1991a, 82).

¹⁹ I present the argumentative structure of the White Paper in the next chapter when I discuss about the goals of Sweden’s immigration policy since 1997.

353-354; in Graham 1999, 119) in which an essential ingredient is religion.²⁰ Furthermore, when it comes to other cultures and traditions, the interpretation is that the state is not to be held responsible for developing and passing them on to successive generations. Upholding certain cultural practices is left entirely to individuals. (SOU 1996:55, 353-354; in Graham 1999, 119.)

The White Paper also recognises that since Sweden is “ethnically and linguistically mixed”, there is a need “to find the kit that can hold all the lifestyle and cultural traditions together.” However, in spite of the fact that the cultural rights of the dominant ethnic majority are supported by the state, it would be wrong to infer that national heritage is believed to constitute the core of national identity:

Unifying Swedishness does not lie in a common historical origin but in the contemporary belonging to Sweden and its social order, basic values of democracy and the equal rights, and values of people. In Sweden, it is ultimately the constitution, the laws, and politics that provide the framework for life in society. (SOU 1996:55, 354; in Graham 1999, 120.)

The quotation implies that, similarly to Britain and the Netherlands, “[i]t is *institutional* forces that do the job of holding society together” (Graham 1999, 120; italics in original). The basis of these forces is formed by values of democracy, liberal principles and legal norms.

To sum up the Swedish case: we can say that, as in Britain and the Netherlands, Sweden’s articulation of national identity can be regarded as inclusive of immigrants, in the sense that it is a matter of attitude towards society’s basic values that demarcates whether or not a person is regarded as a respected member of society. The emphasis placed on the role of national cultural heritage nevertheless indicates that Swedish society wants to preserve its distinctive character even though it recognises itself as a multicultural society. In this sense the proclaimed identity is also exclusive. In Chapter 5 I show that adopting or internalising the Swedish cultural heritage is seen as a necessary condition for an immigrant being able to function successfully in Swedish society.

With regard to the question of how national identity is used in relation to increasing the sense of security and solidarity among citizens, we see that in Sweden too there is a fear of a society in which citizens do not act according to the same rules as the majority. The White Paper from 1990, *Active refugee and immigration policy*, indicates that the debate over immigration in the

²⁰ For example, the syllabus for religious education states that “Swedish society has been strongly influenced by the values and standards of Christianity” (Swedish National Agency for Education 2008, 73) and that “[t]he school in its teaching of Religion should aim to ensure that pupils...develop an understanding of how Christianity has influenced Swedish society” (ibid, 71-72).

mass media is more polarised than ever before, and that there is evidence of adverse changes in the attitudes of the majority society. It is the Muslim group, according to the White Paper, that is “often pointed out as the group that especially hates the ‘Swedish world’” (Riksdagen 1991a, 81). It is worth noting that this was a decade before the terrorist attacks of September 11.

Finally, it can be argued that the debate over the role of values is an important element in the process of building a national identity, with the goal of creating unity and security among citizens.

Denmark

The main outline of the articulation of national identity in Denmark does not differ significantly from the three European countries discussed above. Comments and decisions by the Danish government concerning immigration and the multicultural nature of society display the exact same themes. In the following I present and discuss four governmental documents.

In 1999 the Danish Ministry of Education published a report entitled *Education and Community (Uddannelse og fælleskab)*. The report asserts that the Danish educational system is facing new challenges: not only is there a need to ensure that the pupils’ level of competence is among the best in the world, but the values that can strengthen the community should also be clarified. The following excerpt shows that it is the nation, as a unifying community, that plays a significant role in every citizen’s welfare:

Educational system must strive to give new life to the concept of citizenship, in that we by the notion citizen mean the empowered person that feels obliged to engage in the life of fellow human beings and the community. It is within the community that we learn to handle the problems and crises that occur. Personal freedom is not meaningful until you are part of a community. (Danish Ministry of Education 1999, 2; cited in Haas 2008, 62.)

How, then, can this community be identified? The document recognises that although there is a need for a single unifying community, with its own values, in a multicultural society a fixed definition of national identity is not possible:

We are developing a multicultural identity in Denmark. That doesn’t mean that we lose a Danish identity, but the Danish identity develops and becomes something different than it was – as it has always done. (Danish Ministry of Education 1999, 4; cited in Haas 2008, 63.)

It is worth noting that although a fixed definition is not possible, and national identity is seen as continuously evolving, the reference point is the traditional Danish identity (the “Danish identity”).

In 2000 the Minister of Education Margareth Vestager and the Ministry of Education published a document entitled *Values in Practice (Værdier i virkeligheden)*. According to Haas (2008, 63), this document “offered some clarification regarding the vagueness and tensions between the national and/or multicultural identity”. In the document the Minister writes that plurality has a positive side; “Danish cultural concepts and value patterns had been positively challenged and enriched” (Danish Ministry of Education 2000, 20; cited in Haas 2008, 63). However, the document also speaks of plurality with some anxiety; there is for example a fear of normative nihilism. Thus the Minister considered that the educational system should play a greater role as the upholder of the community’s basic values and norms. (Telhaug et al. 2004, 155-156.)

Vestager makes it clear that it is not the case that “we in Denmark [have] tried to force a uniform Danish nationality on everybody”. Rather, “elements of the Danish identity” should be provided “which are essential for them [newcomers] to feel at home in Danish society without any difficulties”. This “should be done in full consideration of *their own cultural values.*” (Danish Ministry of Education 2000, 39; cited in Haas 63-64; italics added.) Here again we find a clear distinction between ‘us’ and ‘them’. It is the responsibility of newcomers to become like ‘us’, to internalise essential “elements of the Danish identity”. While the report mentions that other people’s cultural values should be respected, there is no reference to the idea of providing real opportunities for expanding and modifying the civil sphere.

It is worth noting that when Vestager speaks of solidarity, her point of departure is “our human and Christian heritage” (Danish Ministry of Education 2000, 37; cited in Haas 2008, 64). Here we find a hint of the ethno-religious essence of national identity. I return to this topic in Chapter 4 where I shall present the debate over an explanatory memorandum in the objects clause in Denmark’s Education Act (the Folkeskole Act) in which Christianity is mentioned as the only example of Danish culture.

Along with values, language is seen as an essential element in the national identity: “[t]he language is itself a symbol of the community” (Danish Ministry of Education 2000, 18; cited in Haas 2008, 64).

In 2003, the Danish government published a document entitled *The government’s vision and strategies for improved integration (Regeringens visioner og strategier for bedre integration)*. The report was to show ‘a new course’ in Danish integration policies. The bedrock of this new course was a stress on the importance of society’s basic values (*grundværdier*):

The basic values on which Danish society is based must be respected. The individual’s opportunities for self-expression cannot be at the expense of those values. Should those basic values nevertheless be violated, the society has to respond immediately and with impact. (Regeringen 2003, 6.)

The reason for emphasising these values is because “the Danish society has during a number of years been challenged by several changes – not least the fact that refugees and immigrants bring new norms and values from other countries and cultures”. It is also written that values are challenged by other parts of population. (Regeringen 2003, 8.) However, the examples of those values and practices that conflict with the foundation values of the society are mainly about foreigners. Furthermore, the only religion that is negatively referred to is Islam:

This happens for instance in connection with the circumcision of girls, forced marriages, and when somebody is expelled from work because of their colour, their conviction or because a Muslim woman wants to wear a headscarf (Regeringen 2003, 8).

In 2004 the Danish government provided a White Paper entitled *The government's strategy against ghettoisation (Regeringens strategi mod ghettoisering)*: as the title implies, it outlines measures to reduce ghettoisation and its harmful consequences. Referring to the report from 2003, *The government's vision and strategies for improved integration*, the White Paper describes the vision of the future as a society whose fundamental values are accepted by every citizen (Regeringen 2004, 11). Ghettoisation is one obstacle to achieving this goal, as some citizens are kept ignorant as to what is going on in the society. The report also refers explicitly to the lack of opportunities for some children to integrate into society. The problem is that they are not provided with information about society's values:

Ghettoisation, however, has the effect that not all citizens have, or are given, any genuinely equal possibility of participating in or contributing to the development of society. Children's future possibilities of integration are significantly impaired. ... And no connection can be made to the fundamental values in society – simply because there is no knowledge of those values. (Regeringen 2004, 11.)

In sum, the Danish case shares the same features as those discussed above in connection with Great Britain, the Netherlands and Sweden. Immigration has made it necessary to stress the importance of the society's values. In the view of Minister Vestager, these values are derived from history and tradition, and the national identity incorporates religious (Christian) elements as well. Thus, as in Sweden, certain representations of religion are elevated to serve the interests of the nation and its citizens.

As with the other countries presented above, it is the attitude towards values that demarcates those who can be regarded as legitimate citizens. Newcomers have the responsibility to internalise the basic principles of Danish society.

With regard to the need to increase the sense of security and solidarity, a stress on the idea of the society as a unified whole is seen as important. It is within such a society that citizens can function properly.

Discussion

I have applied the concept of ‘national identity’ as the arena within which the debate over common citizenship and its basic components has taken place. In particular, I have explored (i) what kind of identity is articulated, (ii) how inclusively identity is defined, and (iii) what role is played by identity in the effort to gain security or promote social cohesion. In the following I sum up my findings briefly and discuss them.

The material used in the analysis shows no indication of a strong ethno-cultural definition of nationhood in any of these nations. On the other hand, as shown by the case studies of Sweden and Denmark, national identity incorporates religious elements as well; in both countries the cultural heritage, in which Christianity has played a significant role, is mentioned.

A central element of national identity in each of the four nations involves values. I have suggested that it is one’s attitude towards fundamental principles that serves to demarcate the boundary between those who are included and those who are not; who is regarded as a legitimate member of a society. As Christian Joppke (2004, 252) puts it “the liberal state is becoming more assertive about its liberal principles, and shows itself less willing to see them violated under the cloak of ‘multicultural’ toleration”. This seems to be precisely the case. In each country studied, all citizens are expected to share unconditionally in the society’s core values. It could be argued that the ethno-cultural notion of nationhood, if one ever existed, has been replaced in political discourse with a ‘modern’, constitutional perspective.

There is a further point to make. While each nation talks about ‘our’ values, what they are actually referring to are the principles of human rights and/or those fundamental values on which all Western secular democratic nation-states are based: democratic order, equality among citizens (including gender equality), individual freedoms and rights, and the rule of law.

Another important finding is that the increased cultural plurality arising from immigration is regarded as a possible threat to social order. An unwelcome future scenario is that of a society divided into separate groups, each endorsing its own culturally derived values. More specifically, the unwelcome values are those religious values – mainly Islamic – that conflict with secular democratic values.

It can thus be argued that the current process of identity formation is about reaffirming Western democratic ideals and simultaneously drawing clear limits as to what can be tolerated. This finding fits in neatly with those theories that emphasise the presence of the ‘other’ in national identity formation. In an article entitled ‘National identity and the ‘other’ (1998),

Anna Triandafyllidou explains the process of national identity formation in terms of the sociological concept of the ‘significant other’. Significant others are those from whom the community tries to “liberate and/or differentiate itself” (Triandafyllidou 1998, 594). According to Triandafyllidou (1998, 600), “[t]he history of each nation is marked by the presence of significant others that have influenced the development of its identity by means of their ‘threatening’ presence.” I have argued that in the documents analysed here, politicians perceive cultural plurality with some concern. This is not merely due to the fact that plurality encompasses different values systems; the main problem arises from the presence, within a society, of ways and views of life that regard illiberal values and practices as valid. From this perspective it is plausible to conclude, as Evans (1996) does, that

[n]ational identity is produced through the process of negation, the creation of a coherent sense of self through explicit rejections and denials. It is a dynamic relationship, defined through the exclusion of groups deemed not to belong. (Evans 1996, 33-34.)

To get back to the empirical material used in this survey: it can be argued that it is the presence of Islam that has launched the process of reaffirmation of what are regarded as Western values. The point seems to be that Islam is perceived as threatening national identity from within (see Schlesinger 1994, 323). In Chapter 1, I noted that one conclusion from the analysis of the European Values Study is that it is an exaggeration to speak of a moral decline in Europe, or to demand a stronger “‘we’-feeling as a dam against (perceived hyper-) individualization” (Draulans & Halman 2003, 398). I have argued that it is because of the challenge to unity of values by those coming from the outside that the need to emphasise the importance of ‘we’-feeling has become topical.

Harald Bauder and Jan Semmelroggen have analysed German parliamentary debates over immigration between 2002 and 2006 (Bauder & Semmelroggen 2009). Their findings are strikingly similar to what I have proposed here. When the data for 403 text passages from parliamentary debates were assigned thematic codes, the finding was that the most frequent narrative had to do with Muslim immigrants. According to Bauder and Semmelroggen (2009, 7) this narrative “revolves largely around the perceived discrepancy between the values of Islam and the secular democratic state.” When the authors interviewed policymakers, they found that “the origin of this threat is believed to rest with religious values and norms that are irreconcilable with liberal democracy” (Bauder & Semmelroggen 2009, 13). Their conclusion is that in the debates Muslim immigration is seen as a threat to the democratic order of the German state (Bauder & Semmelroggen 2009, 1).

Bauder and Semmelroggen suggest that it is religion that serves as a marker of inclusion/exclusion:

The new perspective of German identity excludes immigrants based on their religion rather than their “ethnic” origin. While historically the German nation has distinguished itself from other Christian European nations, such as France, through ethno-cultural characteristics, today, in an era of European political integration and non-European immigrant population that is largely non-Christian, religion appears to be a more suitable marker of distinction. (Bauder & Semmelroggen 2009, 14.)

This conclusion is interesting.²¹ My findings are similar, in the sense that the examples given of inconsistency between cultural values and the society’s core values are mainly about Islam. Considering that certain other religious groups, such as fundamentalist Christians, likewise do not regard all Western values as valid, it is worth asking why these are not mentioned at all. One possible answer is that value statements not only express what can be called an awareness of ‘my’/‘our’ belonging to Western cultural milieu, but also attempt to protect this.²² In this sense, and due to the long history of Christian impact in Europe, various representations of Christianity may be regarded as being closer to this cultural milieu than Islam, even if some interpretations of Islam are closer to democratic ideals than some representations of Christianity. As Pertti Anttonen (2005, 103) writes, “we have reasons why difference makes a difference when it makes a difference, and why similarity does not always carry enough symbolic meaning to unite or integrate those who are similar.” Christianity, as part of the European cultural milieu, may serve as a reason for making the difference, as Bauder and Semmelroggen suggest.²³

We can also look at this issue from the point of view of preserving the public sphere from the impact of the religious; to be more precise, from that of an unwanted religion. Referring to Knott’s theory, we can say, first of all, that the ‘strategy of struggle’, from the point of view of politicians and members of advisory groups, has been quite straightforward. In the material presented and discussed here the purity of society’s values is defended without concession; in other words, the debate over values has been remarkably one-sided. If there has ever been any uncertainty as to which cultural values or practices should be tolerated, it is made clear that any values that conflict with the basic values of the society are not acceptable. In this sense it is not an exaggeration to speak of a ‘sacred concern’ in this matter.

²¹ One may recall the discussion in the previous chapter of Loraine Sheridan’s (2002) study in Great Britain, in which she concluded that religion seems to trigger both implicit racism and general discrimination to a greater extent than does race or ethnicity.

²² By the Western cultural milieu, I here refer to things that are common to all countries in Western Europe, including respect for liberal and human rights principles and the demand of separating the (secular) public sphere from the private one.

²³ This naturally has nothing to do with rational thinking.

We can also ask whether one strategy in the ‘struggle’, conscious or unconscious, has been to contrast the values held by the majority with the *cultural* values of certain religious minorities; the former are seen as not only neutral but in some sense universal and eternal, while the latter, for example certain values and practices of Islam, are seen as something that citizens can eventually abandon. It would certainly be absurd to demand that all citizens should act according to certain values without believing that it is possible.

I have also asked, referring to Rawls’ theory concerning the reasonable citizen, whether it is enough for democratic values to be accepted for political purposes alone; or is it perhaps the case that they should be internalised more deeply, as personally binding, so that they become the principles that guide a person’s daily actions. The question to ask is, why is it so important that *every* citizen accept society’s values? Under the label of ‘neutrality’, or in referring to functional democracy or international conventions, these values are philosophically defensible, since adherence to them secures a fair playing field for all citizens. This is how Rawls ultimately defends his theory. However, as I have argued, this way of thinking and legitimising democratic values usually means that although these values should be unconditionally respected in public, in private citizens can hold whatever values they wish, as long as they do not violate others’ right to hold their own values.²⁴ But the distinction is not that easy to apply in practice. Deeply held religious beliefs are normally regarded as morally binding and non-changeable. It is possible, however, that for most people living in Europe the central principles of human rights – including civil and political rights, basic individual liberties, gender equality and individual freedom – are not just something that provides a framework for political purposes. Rather, they are considered morally binding and cannot be changed through negotiation. In this sense, the virtue of being reasonable is actually quite difficult. As Rawls (1993, 60) writes:

the evident consequence of the burdens of judgment is that reasonable persons do not all affirm the same comprehensive doctrine. Moreover, they also recognize that all persons alike, including themselves, are subject to those burdens, and so many reasonable comprehensive doctrines are affirmed, not all of which can be true (indeed none of them may be true). The doctrine any reasonable person affirms is but one reasonable doctrine among others.

In practice it is difficult to regard other value systems as equally reasonable as the one that a person believes to be true. As Eamonn Callan (1996, 12) puts it:

²⁴ In Chapter 6 I discuss parents’ rights to initiate their children into the form of life they endorse. The point is that liberal theory has traditionally been interpreted in a way that family life is largely left intact, i.e. it is considered to belong to the private sphere.

To retain a lively understanding of the burdens of judgment in political context while suppressing it everywhere else would require a feat of gross self-deception that cannot be squared with personal integrity.

It should also be kept in mind that Europe has a long and undisturbed history of transmitting Western values. In an article entitled ‘Modernization, cultural change, and the persistence of traditional values’ (2000), Ronald Inglehart and Wayne E. Baker present their findings of changing cultural values in different societies due to economic development. These findings are based on data from the World Values Surveys, which include 65 societies and cover 75 percent of the world’s population (average 1400 per country). While their survey confirms the modernisation thesis – economic development does in fact bring pervasive cultural changes – one interesting finding is that it is precisely “[r]eligious traditions [that] appear to have had an enduring impact on the contemporary value systems of 65 societies” (Inglehart & Baker 2000, 31). Sociologists such as Weber and Huntington have presented similar arguments before. According to Inglehart and Baker, religious traditions have led to the creation of cultural zones, and it is possible to talk about a global cultural map (Inglehart & Baker 2000, 32-34). Inglehart and Baker speak of a “shared historical experience” created by religious institutions (Inglehart & Baker 2000, 35); they describe culture as ‘path-dependent’ (Inglehart & Baker 2000, 38).

The practical outcome of all this is that even if it is maintained that society’s values should only apply to the public sphere, it is almost impossible to maintain the distinction between private and public. This is because the national culture is transmitted and disseminated in many ways, including through nationwide institutions such as laws and schools (Inglehart & Baker 2000, 36). Living in a multicultural society inevitably means a certain degree of automatic assimilation, acculturation and homogenisation with regard to values.

Identity at the regional level: Articulation of European identity by the Council of Europe and the European Union

As at the national level, it is obvious that communities operating at a regional level need some kind of identity to be agreed on, in order to guide their actions and ensure their coherence. The fundamental disagreements that arose in the process of creating the EU Constitutional Treaty show that, given the multi-ethnic and multicultural nature of the member states, it has become difficult or impossible to define a ‘European’ identity. Heated debates over references to ‘God’ and ‘Christianity’ in the preamble serve as illuminating examples of the need to recognise the ‘other’ or ‘others’. A compromise was finally reached by referring to the “cultural, religious and humanist

inheritance of Europe, from which have developed the universal values ... of freedom, democracy, equality and the rule of law.” (European Union 2004.)

In the following I discuss aspects of the debate over identity within the Council of Europe and the European Union. I focus on the same questions applied in analysing the articulation of identity at the national level.

The Council of Europe building the identity of Europe

The Council of Europe has organised (at least) two colloquia around the question of European identity: (i) ‘The European Identity (now and in the future): Colloquium in three parts’ (2001-2002) and (ii) ‘European Culture: Identity and Diversity: Colloquy of the Council of Europe’ (2005).

The first part of the 2001-02 colloquium was titled ‘The concept of European identity’. In his opening speech, Secretary-General Walter Schwimmer formulated the goal of finding a ‘profile’ for Europe (Schwimmer 2001a). At the end of two days of roundtable discussions, involving philosophers, historians, political scientists and theologians, the conclusion was somewhat abstract; the group arrived at a definition according to which Europe is a plurality of identities or “a constantly shifting kaleidoscope, mixing perceptions of the past with the search for a coherent future” (Council of Europe 2001a, conclusion summary). In the General Conclusions, the political scientist Dennis Driscoll (2001) argued that

[t]he construction of identity uses building blocks from history, from myth or mythology, from religion, from language, from law ... and from psychology which gives us ... a profound sense of belonging.

However, according to Driscoll, the quintessence of European identity is rights: “In Europe there is a promotion of rights which is not simply a matter of political rhetoric, but these rights are actually guaranteed, notably through the European Convention on Human Rights.” He further suggests that this idea is actually Western, not merely European (Driscoll 2001). In the Conclusion summary of the colloquium “a sense of belonging to a shared legal arena” was also raised as one of the primary elements of European identity (Council of Europe 2001a, conclusion summary).

The title of the second part of the colloquium was ‘From cultural identities to a European political identity’ (Council of Europe 2001b). As the name implies, the task of defining European identity was here framed in terms of the political identity of Europe. The role of commonly shared values was stressed in this colloquy too. For example, in his opening speech Secretary-General Schwimmer (2001b) defined Europe “as a community of shared values in a given geographical area”. According to Schwimmer, one reason for the greatness of Europe is its fundamental unity of values. He also argued that any discussion of European identity should take into account the

great impact of Christianity, Judaism and Islam, which serve as the origins of those values. Since the colloquium was held shortly after 11 September, Schwimmer recognised the rise of islamophobia and added a “spirit of tolerance and mutual respect” to the core of European identity. He also reminded the participants that the Declaration of Cultural Diversity (adopted in 2000) posits an inseparable link between European identity and cultural diversity.

In the conclusions of this second part of the colloquium it is argued that plurality is one of the foundations of Europe (see Adler 2001). Above this diversity, there is nevertheless a certain ‘unity’, a shared roof. This unity is based on shared consensus as to certain values that can be regarded as ‘European’ values.

The third part of the colloquium was entitled ‘Europe tomorrow: shared fate or common political future?’. In its presentation paper the idea of a ‘fluid identity’ is introduced:

The history of Europe reaches far into the past, but the history of European integration is much more recent – and so cannot be encapsulated in a monolithic identity, forged by centuries of unity (Council of Europe 2002).

In his keynote speech, Schwimmer (2002) argued that the leading idea behind the goal of unity is to achieve a “stable peace order”. Since the Second World War the twin sources of the European idea have been the creation of “international structures for safeguarding peace” and the protection of human rights. Obviously, democracy is also something that needs to be protected: “Safeguarding the community of democracies is a legitimate concern of all member States, old and new.” Other themes introduced by Schwimmer were the importance of common legal standards and the need to defend and protect diversity — national, regional, cultural, religious — which is a precious common heritage. At the end of his speech he returned to the idea of values serving as a core of European identity:

In the spirit of such unity, we are committed to the same fundamental values and principles. They are at the very heart of our European identity.

In the other colloquium, the ‘Colloquy on European culture: Identity and diversity’ (2005), the participants represented different parts of Europe and diverse scientific and political backgrounds. The major themes discussed during the colloquium were intercultural and inter-religious dialogue and strengthening social cohesion while respecting diversity. This colloquium moved from abstract ideas to practical actions, such as creating programs in the areas of education, culture and heritage, youth and sport. Democratic values again played a significant role, but respect for other cultures, as an

important educational goal, was raised as well:

Education in all its forms and institutional contexts was analysed as the key vehicle of social and cultural development, which is central to identity formation and civic participation, the sharing of democratic values, the respect of human rights and the building of confidence and mutual respect between cultures and communities (Council of Europe 2005a).

Finally, the concrete ideas that emerged during the colloquy were combined in a message to be conveyed to the Conference of European Ministers of Culture at Faro. In this message, the first point was that “identity is a matter of individual choice, not official labelling.” The second idea was that cultures are not fixed, but are free to change through contact and intercultural dialogue. The importance of social cohesion was also stressed: “The state must manage the creation of a common sense of belonging, mutual trust and an attitude for living together – delicately balanced by cultural protection of diverse traditions and languages.” Finally, the role of education was emphasised: “The key to the successful development of a cohesive, diverse, democratic and free Europe is imaginative and enlightened education.” (Council of Europe 2005a.)

Shortly afterwards, the gathering of European Ministers of Culture issued a statement, commonly known as the ‘Faro declaration’. Familiar themes are mentioned with regard to European identity:

We undertake to pursue our efforts in favour of European identity and unity on the basis of shared fundamental values, respect for and valorisation of our common heritage and cultural diversity (Council of Europe 2005b, 3).

It is worth noting that the Council of Europe’s actions on this issue are not limited to issuing statements. Especially in the field of education several programs have been launched in order to achieve a more stable and just society. I return to these in Chapters 4 and 6.

With regard to the material summarised above, it can be said that the perspective on the world of these official pronouncements and ministerial statements is quite similar to that of the political documents discussed above. Precisely the same elements are foregrounded as essential ingredients of European identity as at the national level. It is values that form the core of European identity, values which should be held in common. It is worth noting that for example Schwimmer does not hesitate to state that these values are culturally driven. The protection of cultural diversity is also seen as important, but these shared values draw strict limits as to what kind of diversity is tolerable.

All this suggests that citizens' attitude towards values are of importance. However, responsibilities that citizens have are not limited only to values; tolerance, open-mindedness towards other cultures, and the ability to engage in dialogue are virtues that all citizens are expected to share.

The European Union

Gabriel N. Toggenburg (2004) has analysed the discussion of values within European Union and the current usage of the concept of 'European values'. He concludes that the issue has become "highly topical in the context of European integration":

[a]t least four factors can be cited for bringing discussion of values to a head: the drafting of the Charter of Fundamental Rights in 2000, the so-called Austrian crisis in the same year, the general turmoil in international politics following September 11 and, finally, the European Convention's drafting of the European Union's new constitutional treaty (Toggenburg 2004, 5).

Toggenburg reminds us that the Community was initially a community of economic interest, and that its development into 'a community of values' has been gradual (Toggenburg, 2004, 7). How, then, does the European Community define itself? The original Community Treaties did not contain provisions relating to human rights or other legal values. However, the jurisdiction of European Court of Justice stated – in the spirit of constitutional traditions common to member states – that "fundamental human rights [are] enshrined in the general principles of Community law" (The European Court of Justice 1969; cited in Toggenburg 2004, 10). According to Toggenburg, in the late 70s and 80s the idea of European values was increasingly invoked and mentioned in EU declarations. After the joining of the post-dictatorial democracies of Greece, Portugal and Spain, the Single European Act of 1986 stated that the Parties are

determined to work together to promote democracy on the basis of fundamental rights recognized in the constitutions and laws of the member states, in the convention of protection of human rights and fundamental freedoms and the European social charter, notably freedom, equality and social justice (European Union 1986, 2: Preamble of the Single European Act; cited in Toggenburg 2004: footnote 29).

These principles are also proclaimed in the Maastricht Treaty (better known as the Treaty on European Union):

The Union is founded on principles of liberty, democracy, respect for

human rights and fundamental freedoms, and the rule of law, principles which are common to the member states (European Union 2002, Art 6 par 1).

Since Maastricht these principles have been enshrined in other treaties, and are today referred to as the constitutional principles of the European Union. Thus, Toggenburg (2004, 10) argues that it is possible to speak of the 'constitutional values' of the European Union. Or, as proclaimed in the European Constitution, in what constitutes, more or less, a declaration of central Western values:

The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail. (European Union 2004, Article I-2.)

Concluding remarks

Every one of us is a bearer of a culture; more precisely, of cultures. Thus we are also bearers of the collective identity of that culture (or cultures) and share its (their) vision (or visions) of the good life.²⁵ The members of a distinct group, for example a religious group, may share only one vision of the good life, while a nation contains many such visions. In this chapter I have shown that Great Britain, the Netherlands, Sweden, and Denmark, as well as regional actors such as the Council of Europe and European Union, have their own 'conviction', a vision of *the* good. The next sentence could be applied to all of these: At the heart of our identity are such values as equality, tolerance, human rights, protection of diversity, individual freedom, and the rule of law.

Another feature of collective identity is that it draws a dividing line between 'us' and 'others', since it defines both sufficient and necessary conditions as to what is required to qualify for membership in a group (Kaunismaa 1997, 226). In some cases only those who share for example a particular vision of the good life are regarded as members, while in other cases membership may be a matter of ethnicity. One of the main questions explored in this chapter was, "who fits the definition of national identity". I have argued that the main marker is the individual's attitude towards Western

²⁵ 'Collective identity' is a social construction that does not actually exist. I use the concept here in the sense it was applied in the Introduction chapter under the section 'Culture'. The point is that there is some factor X, a symbolic code that defines a group, while this group itself also defines the X.

values. Citizens are not only expected to have a positive attitude towards these values; they are also expected to internalise these values as personally binding.

The third feature of a collective identity is its social function. It gives people moral codes as to how to act in different situations. According to Gerald Dworkin (1988, 36-37), moral rules or codes provide

solutions to a coordination problem – a situation in which what one agent chooses to do depends upon his expectations of what other agents do – agents whose choices are in turn dependent on what the first agent will do. ... They [also] provide common standards that are used as the basis of criticism and demands for obedience.

I have suggested that society's core values are important not only because they are philosophically justifiable but also because the majority of people believe in them. They provide a standard for the evaluation of what kind of action is acceptable.

When it comes to the practical consequences of the articulations of identity by these four European nations, it is clear that it is in every nation's interest, as well as in that of the Council of Europe and the EU, that this vision of 'conviction', *the good*, be reproduced. In the following chapters of this thesis I explore how this desire is applied in practice.

Chapter 3

Dealing with cultural diversity

Introduction

The question of how a nation should treat its minorities – whether immigrants, national minorities, religious groups or any other – has produced an enormous number of contributions in the fields of sociology and political philosophy. Applying a very rough distinction, opinions can be divided into two normative lines of thought. Some, for example Barry (2001) and Rawls (1993), argue that the best way to manage diversity and keep society from disintegrating into separate groups is an approach based on egalitarian treatment with commonly agreed liberal principles. Others, for instance Young (1990), Taylor (1992), Kymlicka (1995) and Parekh (2000), campaign for government policies designed to advance the special treatment of minority groups. They believe that the idea of equal treatment supported by traditional liberalism is not sufficient to ensure equal status to minorities along with the majority. The point is that minorities cannot adequately protect their cultural interests, and the members of minority groups feel that they are forced to gradually assimilate into the majority. The emergence of this kind of thinking in the scholarly literature took place in the early 1990s. For example Tariq Modood (2003, 105) describes this as a significant shift “from an understanding of ‘equality’ in terms of individualism and cultural assimilation to a politics of recognition; to ‘equality’ as encompassing public ethnicity.”

The debate over how minorities should be treated cannot be understood without taking into account the distinction between the public and private spheres. The conception of equality for those who are in favour of special recognition means that “‘difference’ (minority ethnicity, etc.) [ought to be] recognised and supported in both the public and private spheres” (Modood 2003, 105). Defenders of a “politics of difference” thus argue that people are treated equally only if “public policy treats people differently in response to their different culturally derived beliefs and practices” (Barry 2001, 17). Iris Marion Young, for example, makes a plea for a politics where no group “is stereotyped, silenced, or marginalized” and where “melting pot ideals of assimilation and unity” are rejected (Young 1990, 88; 95).

The focus in this chapter is on the ways in which Great Britain, the Netherlands, Sweden and Denmark have dealt with cultural plurality, in the past and today. I first clarify and discuss three concepts central to the debate over how minorities should be treated: ‘multiculturalism’, ‘assimilation’ and ‘acculturation’. I then look more closely at the philosophical debate in favour of group rights.¹ Most of this debate takes place at a rather abstract and general level; in other words, the justification of group rights is not tied to any particular topic, such as the preservation of religious identity. However, since the core chapters of this thesis deal with the organisation and content of religious and values education, I focus here on the question of how the basic rationale behind the justification of group rights is applied by those who argue in favour of granting special educational rights to religious groups.

As the main focus in this chapter is on how cultural plurality has been – and currently is – dealt with at a general level, part of the theoretical framework within which I analyse the empirical material involves arguments favouring group rights. The concepts, foundations and conclusions of these arguments provide concrete tools for understanding how, and to what degree, different nations recognise the needs of their (religious) minorities.

Following the consideration of group rights, I describe three models of how difference can be recognised in a plural society. These models form another part of the theoretical framework within which I draw conclusions as to these four nations’ former and current policies for treating diversity.

I then present and analyse the empirical data and discuss my findings.

Essential concepts

Multiculturalism

The term ‘multiculturalism’ is approximately three decades old (see e.g. Abbas 2005, 155). There is no established single usage of the term; in fact, it is both understood and applied in many ways. According to Brian Barry (2001, 22), the term has been used to refer either to a ‘state of affairs’ or to a ‘political programme’ – sometimes both, by the same writer and in the same piece of writing. In speaking of multiculturalism, in any case, we are dealing with the issue of cultural difference (see e.g. Alexander 2001, 237). Here I briefly present the two most common usages, along with their further implications when the term is applied to a political programme.

First, some writers use the term ‘multiculturalism’ neutrally; they see it as “a response — or a set of responses — to diversity that seeks to articulate the social conditions under which difference can be incorporated and order achieved from diversity” (Hartmann & Gerteis 2005, 222; see also Alexander 2001). In this sense the term has to do with different strategies adopted by

¹ My discussion of ‘group rights’ is based to a large extent on my Licentiate Thesis, *Religious Groups’ Illegitimate Demands on Their Children’s Education* (2001).

social agents in a situation of diversity. Since, however, there is rarely only one way to deal with diversity, it would be better to speak of multiculturalisms, as suggested for instance by Haas (2008).

Although the term is sometimes used as described above, there is no agreement as to what the overall goal of such a policy might be. This is where we come to the popular usage of the term. In its scholarly usage the term mostly refers to a movement or ideal, according to which in a multicultural society minority cultures *should* have recognition that goes beyond difference-blind or identical treatment. Tariq Modood (1998, 396-397), for example, argues that

[t]he goal of democratic multiculturalism cannot and should not be cultural neutrality but, rather, the inclusion of marginal and disadvantaged groups, including religious communities in public life. ... [A] policy of public multiculturalism will require the recognition of religious minorities.

Understood in this way, multiculturalism is a policy that “emphasizes group distinctions and tends to legitimize the cultural maintenance and identity affirmation of ethnic and racial groups” (Brug & Verkuyten 2007, 116) or “sees it as the active duty of the state to promote and protect minority cultures” (Koopmans 2006, 23).² Two essential themes here are social equality and cultural rights. This often means that diversity is cultivated by giving minorities special rights. Thus those who favour giving special recognition to minorities can be called ‘multiculturalists’. It is also possible to evaluate the positions taken by scholars; for example Alexander (2001, 238) writes that Young takes a “radical multiculturalist position”.

Not everyone is satisfied with this kind of understanding of the overall objective of how minority cultures should be recognised. Some think that the goal is not improving the position of minorities but enhancing solidarity among citizens. Alexander (2001, 248) for instance claims that

multiculturalism is often fundamentally misunderstood. Not only social conservatives but radical multicultural intellectuals describe it as a process that is organized around separation and difference rather than inclusion and solidarity.

Hartmann and Gerteis (2005) agree with Alexander. According to them, the goal should be creating solidarity or bonds between citizens:

² Joppke & Morawska define multiculturalism as a policy “in which states have deliberately and explicitly recognized and protected immigrants as distinct ethnic groups” (Joppke & Morawska 2003, 8).

Multiculturalism is best understood as a critical-theoretical project, an exercise in cultivating new conceptions of solidarity in the concept of dealing with the realities of pervasive and increasing diversity in contemporary society (Hartmann & Gerteis 2005, 222).

In this thesis, I use the term as it is understood in its most popular sense, namely, that special recognition should be granted to minorities, for example, by giving them special rights. If the writers I refer to or cite use it differently, I point that out explicitly.

Assimilation and acculturation

In the literature referred to in this thesis, the term ‘assimilation’ is used in a way that is closely related to ‘multiculturalism’: it refers to the process of increasing similarity (Brubaker 2001, 533) or “erasing cultural differences and promoting cultural homogeneity” (Bleich 1998, 82). Thus understood, it can be seen as the opposite of ‘multiculturalism’ in its most popular usage.³ The term is also used as equivalent to the preservation of monoculturalism.⁴

Understood in this way, the term is linked to the belief that the state’s actions can (or should) reduce cultural diversity. This could involve for example treating citizens in a neutral manner, putting pressure on immigrants to adopt something from the main culture, refusing to grant special rights, or embracing only one culture. Since ‘assimilation’ is used in various ways, it is necessary here to introduce a more precise term, ‘acculturation’, which refers to the “process of becoming more similar *culturally*” (Barry 2001, 72; italics added). Through acculturation, citizens begin “to acquire cultural practices belonging to the tradition of another group”; assimilation indicates one step further, meaning “a change of membership which makes an individual similar to a receiving community in the sense that the members recognize her as one of their kind” (Bauböck, 1998, 42). Even though ‘acculturation’ is not commonly used in the literature that I refer to, I use the term here in drawing conclusions as to different policies for dealing with cultural diversity.

With regard to assimilation and acculturation, there are two points that need to be made. First, while nations may treat their citizens in a neutral manner, this is not equivalent to the assimilative treatment that nations have

³ For example Ellie Vasta’s (2007) article is titled ‘From ethnic minorities to ethnic majority policy: Multiculturalism and the shift to assimilationism in the Netherlands’. The title of the article by Back et al. (2002) is ‘New Labour’s White Heart: Politics, Multiculturalism and the Return of Assimilation’. Tahir Abbas (2005, 153) speaks of British multiculturalism that returned to assimilation.

⁴ For example Liz Fekete (2004, 18) argues that “[i]t is via the debate on national identity, taking place across Europe, that the state is seeking to steer ‘race relations’ policy away from multiculturalism towards monoculturalism and cultural homogenisation. ... Each nation moves towards the assimilationist model.”

used in the prime years of immigration, when the idea was that immigrants would eventually either return or completely adopt the mainstream way of life. A nation can actively cherish diversity in some respects, even if it treats its citizens similarly. As Brubaker (2001, 533-534) writes, increasing similarity always happens “*in certain respects*, that obviously have to be specified” (italics in original). Assimilation and acculturation are always domain-specific. According to Brubaker, “the desirability of assimilation in [some] respects does not imply the desirability of complete acculturation, for example; or of full ‘identificational assimilation’” (Brubaker 2001, 541). Thus, when talking about assimilation or acculturation on macro level, the question is not mono-dimensional in the sense that we can define how much it happens, but rather multi-dimensional, and the relevant questions to ask are: in what respect, over what period of time, and to what reference population (Brubaker 2001, 544).

Secondly, while total assimilation or acculturation is an unwanted outcome of government policies, some scholars see positive sides to it. According to Hartmann and Gerteis (2005, 236),

there is some reason to believe that the assimilationist vision may provide a strong platform for addressing racial inequality, especially if it is genuinely open to all persons that adopt the dominant culture and language. This is precisely because its bonds of solidarity and feelings of commonality are the richest, deepest, and most widely shared. This is one reason why assimilation is being seriously reconsidered by many scholars (Huntington 2004; Brubaker 2001; Rumbaut n.d.; Barkan 1995; Morawska 1994; Glazer 1993).

The writers’ logic is quite clear: commonly shared principles and customs give citizens a feeling of unity. This in turn is a precondition for ‘thick’ solidarity. When solidarity is achieved, possible inequalities will be recognised and erased because citizens will have good will towards each other.

Philosophical debate on group rights

As already noted, one concrete way to evaluate a nation’s policy in treating diversity is to analyse it within the framework of the philosophical discussion of group rights. In the following I present two arguments in favour of group rights: one by Will Kymlicka, the other by Charles Taylor. My special interest here lies in the nature of rights claims. Both Kymlicka and Taylor suggest that in multicultural societies there sometimes exists a legitimate case for the protection of minority cultures. This is justified by appealing to the importance of culture-based identity. The two writers, however, disagree with regard to the conditions under which protection should occur. Kymlicka’s

(1995; 1989a) justification of the protection of minority cultures leads only to a liberal or liberalising qualification for cultural rights:

I will argue that liberals can and should endorse certain external protections, where they promote fairness between groups, but should reject internal restrictions which limit the right of group members to question and revise traditional authorities and practices (Kymlicka 1995, 37).

Charles Taylor, on the other hand, wants to defend the survival of cultures as such. He is talking not only about equality between the members of different groups but also about the equal value of every culture. His theory leads to a pluralistic policy that institutionalises cultural difference by segmenting society.

I shall argue that the claims of religious groups concerning for example educational rights are more dependent on Taylor's view; this is because they often aim at preserving a distinct collective identity, one which may include practices that are considered illiberal. Since some minorities also want to shelter themselves from external influences, Kymlicka's idea of liberalisation threatens the preservation of cultural identity as such.

Before I introduce and discuss these theories, there is a need for conceptual clarification. First, what exactly do we mean when we speak of 'group rights'? Koopmans et al. (2005, 147) suggest that all group demands have two characteristics in common:

[F]irst, they are demands that go beyond the set of common civil and political rights of individual citizenship that are protected in all liberal democracies; and second, they are demands that, if realized, constitute the recognition and accommodation by the state of the distinctive identities and needs of migrant groups.

A point I want to stress here is that it is not always the case that group rights are demanded in order to gain a form of special treatment that is completely new in a given society, i.e. one is not already granted to someone else. It is thus important to distinguish between 'demands for exceptional rights' and 'demands for parity'. The former means a demand for right(s) that are not already granted to any other group, while the latter means that what is requested involves "the same privileges and exemptions from duties that are already extended to other religious or minority groups" (Koopmans et al. 2005, 159). An example of an 'exceptional group demand' is a case from Britain, in which Muslim parents wished to withdraw their children from Religious Education lessons because they considered that these had harmful effects on their children. This demand was supported by a statement by the Association of Muslim Schools, arguing that if children "get bombarded with different ideologies and different thinking, the Muslim child gets so clicked

on to what the teacher is saying, that he or she thinks whatever the teacher is saying is truth.” (Koopmans et al. 2005, 165.)

An illuminating example of a ‘demand for parity’ comes from Ontario, Canada, where in the 1990s two multi-faith religious coalitions tried to get public funding in order to establish their own religious schools.⁵ In the same province, religious Catholic schools were funded as part of the public schools system, free of cost to the parents. The coalitions’ case can be presented in the form of an argument as follows:

1. The present educational arrangements in society produce some inequalities: members of some minority cultural groups are placed in a disadvantaged position compared to those of the majority culture and one religious group. Education wherein all students are taught a common worldview does not truly accommodate diversity. It actually produces uniformity in the name of diversity. There is also potential harm that occurs if individuals lack a distinctive ethnic identity. If people lose their distinctive particularities, they become nobody. Members of religious minorities would no longer know what it is to be a real Muslim, Hindu or Sikh.
2. Publicly funded educational arrangements, whereby each group can foster its own particular view of the good life, would correct these actual or potential harms.
3. Rights-claims are legitimate and in accordance with the spirit of liberalism or true multiculturalism.
4. It is legitimate to equate religious minorities with cultural minorities. Religion is an expression of culture and religious groups have needs that are analogous to those of ethnic and linguistic minorities. Thus religious groups are in similar need of state protection.⁶ In a truly pluralist, multicultural and democratic society, religious minorities should be equal partners and thus have a right to cultural survival, preservation of cultural heritage and distinctive cultural identities. (See Davies 1999.)

A search for empirical data on various group demands relating to education in the Netherlands, Britain, France, Germany, and Switzerland between 1992-1998 shows that both types of demands occur; demands for parity, however, have been far more popular. These are mostly demands for public financing for a school with a specific religious ethos. (Koopmans et al. 2005, 151-179.)

⁵ One coalition, the ‘Multifaith coalition for Equity in Education’, brought together Sikh, Hindu, Muslim, Mennonite, and Reform Protestant parents; the other consisted of the Ontario Alliance of Christian Schools and the Canadian Jewish Congress (Davies 1999, 3).

⁶ Note that majority is defined similarly; for example the majority religion is secular humanism, which as a worldview is not necessarily widely shared.

Kymlicka and cultural membership as a primary good

Kymlicka's point of departure in his theory favouring group rights is the existence in modern nation states of two sorts of communities: a political community and a cultural community. The existence of these two communities means that individuals also possess two main types of collective identity.⁷ Kymlicka argues that a citizen's primary collective identity is derived from a cultural community, since patterns of activities within a culture

become potential models, and define potential roles, that we can adopt as our own. From childhood on, we become aware both that we are already participants in certain forms of life (familial, religious, sexual, educational etc.), and that there are alternative ways of life, which offer alternative models and roles that we may, in time, come to endorse. We decide how to lead our lives by situating ourselves in these cultural narratives, by adopting roles that have struck us as worthwhile ones, as ones worth living (which may, of course, include roles we were brought up to occupy). (Kymlicka 1989a, 165.)

The point is that cultural membership "is a good in its capacity of providing meaningful options for us, and aiding our ability to judge for ourselves the value of life-plans" (Kymlicka 1989a, 166). According to Kymlicka (1995, 89), cultural identity provides an anchor for self-identification and a sense of belonging. Kymlicka (1989a, 176) cites F. Svensson (1976, 436) to make a point about the importance of cultural identity:

[H]uman beings very reluctantly give up their [cultural associations], even in the face of negative costs of membership (such as discrimination). This is because the group functions as a mechanism for mobilizing the individual to act in general social situations, helps to define needs and desires and the ways to achieve them, and forms the locus of strong affective attachments which figure prominently in self-identity. It also has much to do with the pride and self-respect of individual members.

The essential point in Kymlicka's theory is a possible incompatibility between the two types of communities: as he points out (Kymlicka 1989a, 162), in many liberal states the two types of communities do not coincide, and in some cases the members of some cultural communities may be placed in a disadvantaged position compared to those of the majority culture.

What should be done to give equal footing to these groups? According to Kymlicka, minorities should be granted special minority rights. The

⁷ See Chapter 1, section on 'Religious groups as cultural communities'.

justification for this depends on the idea of acknowledging the equal worth of every citizen. We ought to acknowledge the essential role of cultural membership and the fact that identity is tied to a particular culture. (Kymlicka 1989a, 135.) In his view, cultural membership should be “one of the primary goods with which justice is concerned” (Kymlicka 1989a, 166). He criticises Rawls for ignoring this in his equalitarian theory. Kymlicka argues (1989a, 166) that this would actually be recognised by the parties in Rawls’s original position:

The relationship between cultural membership and self-respect gives the parties to the original position a strong incentive to give cultural membership status as a primary good. As Rawls says, ‘the parties in the original position would wish to avoid at almost any cost the social conditions that undermine self-respect’ (Rawls 1971, 440); the loss of cultural membership is one such condition.

Charles Taylor on recognition, equality and cultural survival

In his essay ‘The Politics of Recognition’ (1992), Charles Taylor favours external protections for minority groups. He argues that we should “*recognize* the equal value of different cultures; that we not only let them survive, but acknowledge their worth” (Taylor 1992, 64). Taylor’s point of departure is the assumption that there is an important link between identity and recognition. As he writes,

[t]he thesis is that our identity is partly shaped by recognition or its absence, often by misrecognition of others, and so a person or group can suffer real damage, real distortion, if people or society around them mirror back to them a conflicting or a demeaning or contemptible picture of themselves. (Taylor 1992, 25.)

Taylor starts with a brief historical account of two changes that have made it possible for us to recognize an indisputable connection between identity and recognition. The first change was the collapse of social hierarchies, formerly the basis of honour. In ancient times, enjoying honour was the privilege of only few people. Not everyone could be worthy of it. Thus honour was intrinsically linked with inequality. With the collapse of the hierarchical system, honour was replaced with the notion of dignity; this in turn is nowadays applied in a universalist and egalitarian sense, based on the inherent dignity of human beings. It is assumed that everyone shares in it and that everyone’s dignity ought to be recognised. Equal dignity and equal recognition are today seen as central to democratic culture. (Taylor 1992, 26-27.)

The second change emerged at the end of the eighteenth century. The importance of recognition was modified and intensified by the new understanding of identity. “We might speak of an *individualized* identity, one that is particular to me, and that I discover in myself” (Taylor 1992, 28; italics in original). The crucial point is that each individual has their own particular way of being, their authentic self. It became important for a person to be recognised because they were different from everyone else. (Taylor 1992, 28.)

And how is every person’s original way of being generated? According to Taylor, the crucial feature of human life is its fundamentally *dialogical* character:

We define our identity always in dialogue with, sometimes in struggle against, the things our significant others want to see in us. Even if we outgrow some of these others – our parents, for instance – and they disappear from our lives, the conversation with them continues within us as long as we live. (Taylor 1992, 32-33.)

The point is that a persons’ discovery of their own authentic identity does not take place in isolation. There are always significant others: “[m]y own identity crucially depends on my dialogical relations with others”. From this it follows, according to Taylor, that recognition becomes increasingly important. (Taylor 1992, 34.)

To understand what Taylor means, we need to take a look at the different levels of recognition, individual and social. In the intimate sphere the formation of identity and the self takes place in a continuing dialogue and struggle with others. At the public level, refusals of recognition can inflict damage on those who are denied it. (Taylor 1992, 36-37.) Here I consider only the public sphere; I introduce Taylor’s views as to what counts as misrecognition and what ought to be done in order to achieve appropriate recognition.

According to Taylor, there is a need for *a politics of difference*: “what we are asked to recognize is the unique identity of this individual or group, their distinctness from everyone else.” (Taylor 1992, 38.) Taylor argues that the politics of difference is based on the idea that all humans are worthy of respect. We have a basic intuition that we should respect our capacity to direct our lives through certain principles. This means that what is of worth here is a ‘universal human potential’, a capacity that all humans share. It could thus be argued that the demand for equal recognition ought to extend beyond a respect for the equal value of all people potentially, to include a respect for what we have made of this equal potential. Then the step needed to arrive at cultural equality is to give “equal respect to actually evolved cultures”. To respect the universal potential for forming and defining identity is thus to acknowledge the possibility that two different cultures – say the European and the Zulu – have the same potential for culture formation. It is a

mistake at the outset to say that Zulus might produce a culture that is less valuable than others, since saying this would mean denial of this fundamental principle of human equality. Every culture contributes to worth in different ways, and thereby becomes equally worthy of recognition. (Taylor 1992, 41-43, see also 64; 72.) As Taylor writes,

[i]f all cultures have made a contribution to worth, it cannot be that these are identical, or even embody the same kind of worth. To expect this would be to vastly underestimate the differences. (Taylor 1992, 71: footnote 41.)

However, the premise that all cultures have equal worth is problematic, and Taylor thinks that it may not be valid to demand this as a right. One obvious problem is that it seems senseless to demand that we come up with a final concluding judgment saying that their value is great, or equal to others (Taylor 1992, 69). Another problem is the controversy over the objectivity of judgments. However, Taylor suggests that since judgments are ultimately a question of human will, the issue of justification falls away:

One doesn't, properly speaking, make judgments that can be right or wrong; one expresses liking or dislike, one endorses or rejects another culture. ... [T]he validity or invalidity of judgments here has nothing to do with it. (Taylor 1992, 69.)

Judgments like “when a Zulu produces Tolstoy we will read him” show the depths of ethnocentricity. It seems that when we assume something to be excellent, it has to have a form that is familiar to us. The other error is that we assume that their contribution is yet to be made. (Taylor 1992, 71.) According to Taylor, the presumption of equal worth could be grounded at the human level:

[I]t is reasonable to suppose that cultures that have provided the horizon of meaning for large numbers of human beings, of diverse characters and temperaments, over a long period of time – that have, in other words, articulated their sense of the good, the holy, the admirable – are almost certain to have something that deserves our admiration and respect, even if it is accompanied by much that we have to abhor or reject. Perhaps one could put it another way: it would take a supreme arrogance to discount this possibility *a priori*. (Taylor 1992, 72-73.)

Real judgments of worth assume a fused horizon of standards: through the study of the other we ourselves gradually change, until eventually we are no longer judging by our familiar standards. (Taylor 1992, 70.) According to Taylor, there are two possible – and mutually conflicting – interpretations of the principle of equal respect: a) “a politics of equal respect” and b) “a

politics of difference”. The first means the same universally, an identical basket of rights and immunities, and is applied in contemporary political theories. The second interpretation emphasises the need to recognise the unique identity of an individual or a group: their distinctness from everyone else. (Taylor 1992, 43.)

Taylor favours the second interpretation. He emphasises that the first one, the politics of equal respect, requires that we treat people in difference-blind fashion. However, this is problematic since the supposedly neutral set of difference-blind principles is

in fact a reflection of one hegemonic culture. As it turns out, then, only the minority or suppressed cultures are being forced to take an alien form. Consequently, the supposedly fair and difference-blind society is not only inhuman ... but also, in a subtle and unconscious way, itself highly discriminatory. (Taylor 1992, 43.)

In other words, distinctness is assimilated to a majority identity, “[a]nd this assimilation is the cardinal sin against the ideal of authenticity” (Taylor 1992, 38).

In contrast to a difference-blind treatment, the politics of difference claims that distinctions should be seen as the basis of differential treatment. The goal is cultural survival or the protection of collective identities.

Difference between Kymlicka and Taylor

In the discussion of collective identities in the section ‘Concluding remarks’ of the previous chapter, I mentioned that collective identities include normative and ideological power; in other words, they define what is seen as right or wrong and what is to be regarded as appropriate behaviour in certain situations. Here it is also worth noting (i) that collective identity is not voluntary in the sense of being a matter of individual choice, and (ii) that a group’s practices function in such a way that norms defined by a collective identity are usually regarded as legitimate by members of that group.

Kymlicka and Taylor argue that a person’s initial culture is of particular importance to him or her, but they disagree as to what implications this should have. One essential difference can be formulated in the form of a question: to what degree should we protect the members of disadvantaged cultures? Should we protect cultures in order to give members equal standing by equalising life conditions with the majority, or should we also guarantee the survival of cultures forever? Kymlicka allows protection, arguing that “[i]t seems that some measures of cultural protection are justified ... Once we recognize cultural membership as an important primary good which underlies our choices, then special rights and status for minority cultures may be required” (Kymlicka 1989a, 199). He does not talk about protecting cultures

as such: “Protecting people from changes in the character of the culture can’t be viewed as protecting their ability to choose. On the contrary, it would be a limitation on their ability to choose” (Kymlicka 1989a, 167). Kymlicka’s theory is not in favour of protecting for example a group of illiberal character.

Taylor (1992, 40), on the other hand, argues that we should

maintain and cherish distinctness, not just now but forever. After all, if we are concerned with identity, then what is more legitimate than one’s aspiration that it never be lost.

Thus Taylor is seeking an effective pluralist policy.

What further implications do these theories have? One essential feature in Kymlicka’s theory is that the cultural community is being recognised as a context of choice. He writes that cultural membership is “a good in its capacity of providing meaningful options for us, and aiding our ability to judge for ourselves the value of our life-plans” (Kymlicka 1989a, 166). There are, I think, two points to make. First, Kymlicka is careful not to say that membership is valuable because we can only choose those life-plans that a certain community regards as valuable. Thus Kymlicka’s notion introduced above, “we decide how to lead our lives by situating ourselves in these cultural narratives, by adopting roles that have struck us as worthwhile ones, as ones worth living” is not descriptive, in the sense that cultural membership is seen as providing the limits within which a person can understand what is worthwhile. Rather, Kymlicka sees cultural membership as being a context of choice, in the sense that we can choose to do differently than currently prescribed as the culture’s norms. We can regard as valuable something that the community does not see as such.

Secondly, Kymlicka(1989a, 167) argues that a community’s norms and practices may change through revision: “the cultural community continues to exist even when its members are free to modify the character of culture, should they find its traditional ways of life no longer worthwhile”.⁸ Thus he maintains that a collective identity that is not voluntarily chosen may change following reflection by the members of a community.

This notion, cultural community as a context of choice, is thus fundamentally different from the idea of the character of a community. In the latter view, “changes in the norms, values, and their attendant institutions in one’s community (e.g., membership in churches, political parties, etc.) would amount to loss of one’s culture” (Kymlicka 1989a, 166). The former view, favoured by Kymlicka, emphasises the meaning of the structure of the culture rather than the character of a cultural community: “It is the existence of a

⁸ For example the Council of Europe’s ‘Colloquy on European culture: Identity and diversity’ (2005) states that cultures are not fixed, but are free to change through contact and intercultural dialogue (see Chapter 2).

cultural community viewed as a context of choice that is a primary good, and a legitimate concern for liberals” (Kymlicka 1989a, 169).

The question about religions’ protected cultural survival

Kymlicka’s theory has been criticised. According to Taylor, for instance,

Kymlicka’s reasoning is valid (perhaps) for *existing* people ... But it doesn’t justify measures designed to ensure survival through indefinite future generations. For the populations concerned, however, that is what is at stake. (Taylor 1992, 40-41: footnote 16.)

Taylor does not want to restrict the scope of protection in the way that Kymlicka does. The main reason for criticism of Kymlicka, however, arises from the fact that his theory endorses the value of personal autonomy. According to Parekh (2000, 110), this tendency “to absolutize liberalism” divides “all ways of life into liberal and non-liberal, equate the latter with illiberal, and talk of tolerating and rarely respecting or cherishing them.” Parekh writes that “[i]f liberals are to do justice to alternative ways of life and thought, they need to break away from this crude binary distinction.” Similarly, Modood (1998, 390) argues that rather than a theory that bases multicultural citizenship on a ‘context of choice’ argument, we should try to create a theory of multiculturalism “in which we respect and recognise people’s sense of belonging, regardless of whether that identity is a context of choice or not.”⁹

It is important to review here at some length the critique of autonomy-based liberalism; in the academic debate the justification of religious groups’ rights are often based on an idea according to which multicultural policies should not be founded on an autonomy-based liberalism, and accusations of promoting assimilation often lean on these arguments. More importantly, what is at stake is the question of how a nation should react to those religions’ values that are not in line with its ethos. As we have seen in Chapter 2, it is in the interest of every nation (as well as the Council of Europe and the EU) that every citizen have a positive attitude towards democratic values. I have argued that it is this attitude that has become the main marker of inclusion/exclusion when it comes to the question of who fits in with the definition of national identity.

⁹ The idea that autonomy is a crucial value of a liberal theory has also been challenged, for example by Galston (1995), Habermann (1994), Halstead (1995), Rawls (1993), Strike (1998), Tamir (1995), and Tomasi (1995). These scholars see themselves as liberal but claim that autonomy is not a necessary ingredient of a liberal doctrine.

Yael Tamir's right-based liberalism and respect for decent (religious) cultures

In her article 'Two Concepts of Multiculturalism' (1995), Tamir presents a theory that she calls 'thick' multiculturalism. Her starting point is that in a plural society too much is demanded of illiberal communities; in order to achieve a fair society, one where liberal and illiberal communities can live side by side, liberal communities should accept the fact that those citizens who hold illiberal views of life have an equal right to lead the life they wish. Rather than an autonomy-based liberalism, which merely tolerates and respects autonomy-supporting cultures as a starting point in multicultural politics, what is preferable, according to Tamir, is a rights-based liberalism which is sensitive to the rights of individuals "without conceiving of those rights as grounded in autonomy-entitlement and choice prerogatives". In seeking genuine respect for others, liberals should tolerate "decent illiberal cultures which do not foster the ideal of personal autonomy". (Tamir 1995, 168.)

What, then, is wrong with autonomy-based liberalism? Tamir argues that many liberals who believe personal autonomy to be paramount also consider that human dignity requires autonomy. Autonomy here means that a person has the ability to independently determine a view of the good life for themselves. This concept of autonomy, according to Tamir (1995, 168), suggests that "[m]embership of cultural, religious or national groups is ... seen as valuable only to the extent that it provides a context for choice, an evaluative horizon". This in turn means that espousing the ideal of an autonomous life entails the risk that illiberal cultures will be ranked as inferior to liberal ones, as they do not necessarily contribute to their members' ability to develop the mental skills or independence required to lead an autonomous life.

According to Tamir (1995, 168), a multicultural politics founded on an autonomy-based liberalism will lead unjustly to actions designed to assimilate illiberal cultures into liberal ones. If a multicultural politics is founded on a rights-based liberalism, assimilation is not a necessary conclusion; such a liberalism places "at its core a commitment to equal concern and respect for individuals, their preferences and interests, regardless of the way these were formed". If reasonable illiberal communities are valued by their members, "even if they fail to provide (or even prevent) the chance to develop autonomous lives", they have the right to exist. "Hence for rights-based liberalism the question is not which cultures allow individuals to develop their autonomy in a better, more comprehensive way, but rather which societies individuals would like to live in" (Tamir 1995, 169).

Kenneth Strike and context sensitive balance

Similarly to Tamir, Kenneth Strike makes a plea for a more sensitive liberal theory. He argues that although liberals value autonomy, and indeed it may be that autonomy is one of the reasons why liberals value tolerance, it is not the only reason. There are other reasons, such as the avoidance of sectarian strife and of psychological violence against individuals. Strike writes:

[r]eligious beliefs may be deeply held. And this fact about them is independent of whether they are autonomously held. Those who say to their governments, 'I must obey God rather than man', or 'Here I stand, I can do no other' are damaged when their convictions are subjected to coercion regardless of whether their beliefs are autonomously acquired. Liberals must not respect autonomy to excess. (Strike 1998, 358.)

According to Strike, we should find a context-sensitive balance between different liberal values, such as autonomy and freedom of conscience:

[t]he commitment to balancing requires that we accept outcomes that have real costs. Freedom of conscience may require that we accept groups and practices that may socialize children who will not support or fully support liberal values. It may require that we accept some forms of injustice in order to avoid others. (Strike 1998, 358-359.)

Strike's interpretation of liberalism, like Tamir's, is based on the understanding that adults are not only free to live a life that does not regard autonomy as worth pursuing, but are also free to inhibit, to some degree, the promotion of autonomy in their children. I return to this issue in Chapters 5 and 6.

Minority claims in numbers

It is time to place the above discussion in the appropriate frame of reference. What is at stake in the claims of Tamir and Strike is of course the right to protect and produce a kind of *religious* identity that is not in line with the value of autonomy.

Empirical evidence supports this conclusion. Koopmans et al. (2005) have collected empirical data on immigrant group claims in Britain, France and the Netherlands between 1992 and 1998. Looking at the type of collective identities expressed in immigrants' group demands, we find two interesting points. First, a vast majority of immigrant group claims were made using religious forms of identification: in France more than half (53.1 %), in the Netherlands six out of ten (60.0 %), and in Britain two thirds

(65.9 %). Secondly, “group demands are made principally through one religious self-identification, i.e., Muslims.” (Koopmans et al. 2005, 154.)

It is reasonable to ask why other immigrant groups possessing a strong religious identity, for example Hindus, have not made such claims. According to Koopmans et al. (2005, 155),

the relatively low level of Hindu group demands compared to Muslims is the result of the different infrastructures of the two religions in their societies of settlements. Islam is a more collective and public religion, centred on the mosque, whereas there are many different types of Hinduism ... As a non-proselytizing de-centralized religion that is practiced privately, Hinduism as a new minority religion has fitted more easily within the political space granted.

Their conclusion is that “multicultural debates in Europe tend to be about the position of Islam”. However, it is worth noting that while Muslims have made most of the demands, the phenomenon is still relatively marginal. Most Muslims seem to adhere to a secular or modern understanding of Islamic practice. (Koopmans et al. 2005, 156.)

Now let us get back to the counter-arguments to Kymlicka’s justification of group rights. It is argued that Kymlicka’s idea that the character of the community ought not to be protected, and his claims that liberals should seek to liberalise illiberal groups (see Kymlicka 1989a, 170; 1995, 94), in many cases “amount to a forced shift of basic group identity” (Galston 1995, 523). This turns out, according to the critique presented, to be the “cultural equivalent of the Vietnam-era principle of ‘destroying the village in order to save it’” (Galston 1995, 523). In other words, Kymlicka’s view does not accommodate diversity in the way that for example some religious minorities would want it to. Actually, it seems to leave many religious communities unprotected just as they are at present. According to Mark Halstead (1995, 266-267), when Kymlicka distinguishes between the protection of the community as such and the protection of a particular preferred vision of what sort of character the community should have, “this rules out the right of religious minorities ... to preserve their distinct cultural identity, since it is only the groups’ possession of a ‘preferred vision’ which makes them a distinct community at all”. This is so because “their shared identity depends not on a shared cultural heritage ... but on a shared framework of fundamental beliefs”.¹⁰

It is useful here to take into account the differences between religious groups and other minority groups, whether autochthonous (native citizens) or allochthonous (immigrants). Halstead (1995, 264) argues that religious groups differ fundamentally from autochthonous ones in two ways: (1) their

¹⁰ The reader may recall that in Chapter 1 I wrote that especially diasporic religions are faced with ‘border problems’ (Turner 2011, 167).

culture is (in most cases) not associated with a particular territory within a state, and (2) “preservation of their distinctive culture does not involve significant restrictions being placed on the rights of the majority”. In the case of allochthonous groups, on the other hand, religious minorities differ in three ways: (1) religious groups want to bring up their own children “in line with their own religious commitments”, (2) the groups’ religious commitment determines the primary identity of these religious minorities, and (3) “the cultural identity of such groups is not of a form which can be tacked on as an extra component to their citizenship. ... On the contrary, their religious identity is something which they believe should permeate the whole life.”

Halstead refers to his own empirical research with Muslim communities.¹¹ According to this study, one of Muslim parents’ main educational goals is the “preservation, maintenance and transmission of their distinctive beliefs and values, both through direct teaching and through a school ethos informed by these values” (Halstead 1995, 265). Halstead argues that if religious groups “cannot use education to maintain this shared framework of fundamental beliefs, then their culture is vulnerable either to gradual corrosion as a result of sustained exposure to liberal values or to a more direct assault by liberal social policy” (Halstead 1995, 267).

The reason why minorities want separate schools is to provide children with an education where the beliefs and values of the school are broadly in line with those of the home. Kymlicka’s demand for the liberalising of cultural communities, however, seems to be incompatible with the claims of minorities. According to Halstead (1995, 264), religious minorities find it difficult to accept an education in which for 95% of the time their children are subjected to a ‘neutral’ or secular curriculum, while 5% is devoted to their own cultural or religious beliefs and practices. The 95% would be perceived as potentially undermining their faith. Here, faith is specifically something that pupils’ independent thought might undermine.

Halstead (1995, 270) argues that “each cultural group must be free to pursue its own conception of the good within a framework of justice and equal respect. The freedom guaranteed to citizens by political liberalism includes the freedom to pursue non-liberal cultural goals.”

Problematic group rights

If Kymlicka’s justification of group rights is not particularly useful in cases where certain religious groups want to protect their children from alien influences, another possibility is to refer for example to Taylor. However, quoting Taylor in order to justify educational rights for religious minorities seems problematic. First of all, the presumption of the equal value of every

¹¹ See Halstead (1986).

culture has been questioned. It is one thing to say that a particular culture has something that deserves our admiration and respect, even if it is accompanied by much that we have to abhor or reject; it is quite another to claim that every culture has equal value. In his critique of Taylor, Habermas (1994, 129-130) writes: “[t]he right to equal respect, which everyone can demand in the life contexts in which their identity is formed as well as elsewhere, has nothing to do with the presumed excellence of their culture of origin.”

Secondly, the conclusion that Taylor sees as a proper way to protect minorities is seen from a liberal point of view as questionable. This is so because his idea of protecting diversity “calls into question the individualistic core of the modern conception of freedom” (Habermas 1994, 109). Taylor’s demand for respect does not seem to be aimed at equalising the living conditions of individuals, but rather at protecting the integrity of traditions and forms of life. According to Habermas (1994, 109-110), since equal rights of co-existence are individual rights of free association and non-discrimination, they should not guarantee survival for any culture. The political project of preserving cultures as if they were endangered species deprives cultures of their vitality and individuals of their freedom to revise and even to reject their inherited cultural identities. As Habermas (1994, 130-131) argues:

cultural heritages and the forms of life articulated in them normally reproduce themselves by convincing those whose personality structures they shape, that is, by motivating them to appropriate productively and continue the traditions. The constitutional state can make this hermeneutic achievement of the cultural reproduction of lifeworlds possible, but it cannot guarantee it. When a culture has become reflective, the only traditions and forms of life that can sustain themselves are those that bind their members while at the same time subjecting themselves to critical examination and leaving later generations the option of learning from traditions or converting and setting out for other shores.

The point of Habermas’ critique is that collective rights that override the theory of rights tailored to individual persons are illegitimate: it is inconsistent to ask for the protection of a form of life and tradition in the name of recognition of the group’s members, while at the same time demanding collective rights that would perhaps trump some members’ interests.¹²

¹² Elsewhere (Himanen 2001, 80) I have discussed the practical problem that relates to Taylor’s theory, using John Tomasi’s (1995, 603) argument according to which “[w]e best respect the group members by not insisting on respecting them as individual holders of the full set of liberal rights”. I argued that this kind of argument is problematic in at least two ways. First, we would eventually have to decide what should count as an

K. Anthony Appiah (1994, 162-163) shares Habermas' critique and argues that group recognition may tie individuals too tightly to scripts over which they have too little authoritative control. According to Appiah, "[b]etween the politics of recognition and the politics of compulsion, there is no bright line."

Theoretical framework for the analysis of empirical data

Models for analysing multicultural policies

As I wrote in the introduction to this chapter, my main focus in this chapter is to evaluate the policies of Great Britain, the Netherlands, Sweden and Denmark in treating cultural diversity. I do so by exploring, first of all, in what respects difference is recognised, secondly, what changes have occurred with regard to this matter. The discussion of group rights provides a useful background for this purpose. In order to accomplish a more comprehensive analysis, however, I also introduce and discuss three different models of multicultural policy.

One theoretical framework for analysing how difference is recognised in a multicultural society is provided by Jeffrey C. Alexander (2001). His framework is based on the question of how the identities or qualities of those who do not belong to the mainstream culture are treated in the public sphere. Alexander makes use of three key concepts. The first of these, the 'civil sphere', refers to "a social sphere or field organized around a particular kind of solidarity". This second concept, 'solidarity', refers to collective obligations and goodwill toward the members who compose the sphere. (Alexander 2001, 239-240.) Finally, the concept of 'primordial qualities' refers to elements that are essential ingredients of personal identity. These may relate to race, religious identity, sexuality, or previously adopted national identity (Alexander 2001, 246).

According to Alexander, the "modes of incorporation" in a multicultural society are assimilation, hyphenation, and multiculturalism. *Assimilation* means that a person's culturally driven (primordial) identities are not welcome in the civil sphere. Quite the contrary; individuals are "separated from their primordial *qualities*" through different socialising channels, for example through education. (Alexander 2001, 243; italics in original.) As Alexander defines it, "assimilation takes place when out-group members are allowed to enter fully into civic life on the condition that they shed their polluted primordial identities". This means that outsiders' culturally born identities must be shed when they enter into the civil sphere. A typical example of assimilation is when the state provides members of an out-group with a civil education in order to impart to them the competences they will

acceptable failure to respect individual rights; secondly, we would have to regard children as bearers of some particular culture from birth.

need in order to function properly in the society. It is worth noting that in this model the distinction between the private and public spheres is quite clear: “because the polluted qualities of stigmatized group membership are even more firmly restricted to the private sphere, this split becomes sharper and more unyielding” (Alexander 2001, 244).

According to Alexander, assimilation is an unstable state of affairs. When assimilation creates dissatisfaction, one possible positive outcome is *hyphenation*. In this model, the particularities of outsiders are not viewed in one-sidedly negative ways. Outsiders are considered “ethnic” rather than “foreign”, and are tolerated better in public life. This makes it easier to create cross-group bonds, since “opportunities for dialogue, understanding, and emotional bonding” are provided, which may result in “the creation of a common collective identity”. (Alexander 2001, 245.)

However, while there are positive sides to such a development, “significant stigmatization remains” when it comes to the qualities of outsiders. The point is that outsider qualities are still defined one-sidedly. In hyphenation, “ambition does not extend to redefining outsider qualities as much as to allowing members of denigrated groups to be separated from them” (Alexander 2001, 245).

The third model, *multiculturalism*, according to Alexander, is preferable to assimilation or hyphenation, since it creates the possibility of “expanding and revising the civil sphere”: more precisely, “all ... primordial qualities are open to reinterpretation as representations of the ‘sacred’ qualities of civility” (Alexander 2001, 246). Alexander argues that in a truly multicultural community “universal solidarity is deepened” and “particularity and difference become the guiding themes of the day”. This means “a dramatic decrease in the negative identification of the previously subordinated”. (Alexander 2001, 246.) The outcome is wide acceptance of others as well as their cultures. An example of this is the emergence of the slogan “Black is beautiful”; according to Alexander, this slogan arose in order to invert its negative identification. (Alexander 2001, 247.)

In their article ‘Dealing with Diversity: Mapping Multiculturalism in Sociological Terms’ (2005), Douglas Hartmann and Joseph Gerteis offer a theoretical framework for analysing how different nations deal with cultural diversity that takes more variables into account than that of Alexander. However, their framework too is fundamentally about how different identities are taken into account in a public sphere.

The model is two-dimensional (see figure 2). The first dimension describes the basis for solidarity, in terms of two alternatives: thick and thin. Among citizens, thick solidarity is achieved by emphasising moral bonds among them. Solidarity is thinner, on the other hand, if “shared procedural rules in the forms of norms or laws can provide a shell adequate to maintain

social order even in the face of deep moral divisions”. (Hartmann & Gerteis 2005, 223.)

The second dimension describes the basis for association. Here “the core distinction is between visions that propose that the basis for social association is individual interactions and those that suggest a more central role for groups” (Hartmann & Gerteis 2005, 223).

Figure 2 (Hartmann and Gerteis 2005, 224):

		Dimension 1: Basis for Cohesion	
		Substantive Moral Bonds	Procedural Norms
Dimension 2: Basis for Association	Individual in Society	Assimilationism	Cosmopolitanism
	Mediating Groups	Interactive Pluralism	Fragmented Pluralism

The essential feature of *assimilationism* is that moral cohesion is achieved by upholding and creating substantive moral bonds among citizens (Hartmann & Gerteis 2005, 226). It is common values that create the ‘centre’ of society (Hartmann & Gerteis 2005, 227). The importance of mutual responsibilities is also emphasised. In considering the basis of association, the emphasis is on the individual. At the micro-level, the mediating role of the groups is denied; at the macro-level, on the other hand, the group and the nation are the same. Here we see similarities to Alexander’s theory, since the idea of identity based on group membership is denied in the public sphere. Individuals are expected “to shed their previous markers of group identity and adopt those of the social whole”. Difference is removed and the emphasis is on cultural homogeneity. (Hartmann & Gerteis 2005, 226.) “By minimizing distinctiveness, particularly with regard to cultural values systems, the bonds of mutual understanding as well as mutual responsibility are maximized.” National culture is the one to be cherished, and its outlines are clear. Differences in the private sphere are tolerated, however, as long as they are not pushed into the public sphere. (Hartmann & Gerteis 2005, 227.) According to Hartmann and Gerteis, France is a good example of this kind of policy (Hartmann & Gerteis 2005, 228).

In *cosmopolitanism* the value of diversity is recognised and cherished to a certain degree. The limit is that group restrictions placed on individuals are not considered welcome. If diversity leads to increased individual rights and freedom, it can be valorised and defended. However, group identity is not the source of public rights, and group membership is a matter of individual choice. When it comes to values, there is no thick commitment; rather the role of procedural norms is emphasised. The values to cherish are tolerance and individual choice. At the national level inclusive elements of identification are not strong, since the model does not insist that all members share the same core traits. (Hartmann & Gerteis 2005, 228-229.) “[T]he social whole is one among many sources of identity, and it is not necessarily the most salient” (Hartmann & Gerteis 2005, 228).

In *fragmented pluralism* the social whole is dissolved into collective units. Procedural norms form the basis for social cohesion. A salient feature is the heavy role of groups. “The individual, in short, gets subsumed by the group rather than the nation.” The state is largely empty of content. (Hartmann & Gerteis 2005, 229-230.)

Finally, *interactive pluralism* means that membership in a group is seen as a primary source of identity, and that group identity claims are regarded as legitimate. However, there is a thick substantive form of cohesion. Substantive moral order is something that has emerged from interaction. The focus is on mutual recognition and respect for difference, not so much on citizens’ responsibilities to each other. This model implies a decentralised vision of national culture. It is groups in action that create the society as a whole. (Hartmann & Gerteis 2005, 231-232.)

The third framework that I find useful in analysing different nations’ approaches to diversity is the model proposed by Erik Bleich (1998). According to Bleich, national diversity policies are either non-multicultural or multicultural. The former can be further divided into assimilationist and preparationist models, the latter into passive and active multicultural models. Assimilative cultural policies aim at erasing cultural differences and promoting homogeneity. The preparationist model nourishes cultural differences but only because it aims at the eventual disappearance of cultural minorities. (Bleich 1998, 82.)

In multicultural models, *passive multiculturalism* is “an attempt to allow for a measure of cultural diversity by making certain exceptions for minorities while limiting the effect of changes on the majority”; *active multiculturalist policies*, on the other hand, “go further by attempting to create a new national culture which encompasses minority as well as majority cultures and perspectives” (Bleich 1998, 83).

The three models described above provide useful tools for analysing how out-group members, in this case those who do not belong to the majority, and

their culturally driven identities are treated in the public sphere in Great Britain, the Netherlands, Sweden, and Denmark. Applying these models, we can determine whether or not difference is recognised, and if so, in what way. Applying a rough scale: at one end we find a policy of ‘assimilation’, according to which out-group members are expected to gradually shed their primordial identities, while at the other end is a policy under which an opportunity for the emergence of a ‘new’ culture is allowed or even encouraged.

Relevant questions for the analysis of empirical data

In 1999, Will Kymlicka (1999a, 113) wrote that “multiculturalists have won the day” in making their demands as to greater accommodative respect. However, soon afterwards, scholars in the fields of sociology and political philosophy began to recognise a *shift* within Europe in government policies with regard to diversity.¹³ In the following I analyse the four nations’ current immigration policies, in order to determine whether or not multiculturalism has ever been a dominant policy in these countries. I also try to specify in what respects and to what degree multiculturalism has occurred. However, as noted, the main task is to investigate how cultural diversity is treated in these countries. The models proposed by Alexander, Hartmann and Gerteis, and Bleich, along with the discussion of group rights, provide appropriate questions for these purposes. I limit my enquiry to two areas: society’s expectations towards citizens, and the recognition of groups. Both areas are important for my further enquiry in Chapters 4, 5 and 6. With regard to society’s expectations towards citizens, my main questions are the following:

- (i) What kind of civil sphere is proposed? How important is civic identity as a source of personal identity?
- (ii) What is the role of society’s core values? Are they meant to be moral bonds or procedural norms only?
- (iii) What responsibilities do citizens bear towards the nation and towards each other?
- (iv) What kind of solidarity among citizens is expected? Here I refer to Alexander’s (2001, 239-240) definition, according to which solidarity means collective obligations and goodwill towards other members of society.

¹³ In 2001, Brubaker argued that France, Germany, and the United States have faced ‘the return of assimilation’. Two years later, Tariq Modood (2003, 101) claimed that “[a]cross Europe, multiculturalism — a policy suitable where communities want to maintain some level of distinction — is in retreat and ‘integration’ is once again the watchword.” An article by Han Enzinger from 2003 is titled ‘The Rise and Fall of Multiculturalism: The Case of the Netherlands’. In 2004 Christian Joppke (2004) wrote of the ‘retreat of multiculturalism’ in Australia, Britain and the Netherlands.

- (v) How are primordial qualities treated in the civil sphere? Are they expected to be shed when people enter the public sphere?
- (vi) Does a nation allow opportunities for immigrants to enrich the public culture? (This question was inspired by Bleich's distinction between active and passive multiculturalism.)

The second series of questions has to do with the treatment of groups:

- (vii) What is the unit of incorporation – the group or the individual?
- (viii) What is the overall goal of incorporation – equality among groups or equal opportunities for individuals?
- (ix) Who bears responsibility for upholding cultural diversity? (This question is derived from the debate over the relationship between identity and group. What is interesting here is in what respect(s) identity is a source of public rights.)
- (x) To what degree are group claims seen as legitimate demands?

Coping with cultural plurality in Great Britain, the Netherlands, Sweden and Denmark

Great Britain

Tahir Abbas (2005, 157) writes that in Britain, from the 1950s through the 1970s, immigrant treatment policy aimed at making them more like the majority. According to Abbas, this “*assimilationist model*” did not adequately take into account the social psychology of group identity. A change of policy took place in the late 1960s, and *multiculturalism* emerged as the official policy allowing for the recognition of ethnic diversity in Britain. (Abbas 2005, 158; italics added.) Abbas describes this multiculturalism as providing a framework within which ethnic diversity could be recognised by policymakers. Nevertheless, he reminds us, it was difference that was still perceived as a problem. (Abbas 2005, 158.)

What kind of multiculturalism might this arrangement have promoted? In terms of Bleich's model it looks like passive multiculturalism, since it was not the case that the majority adopted cultural practices from minorities; in terms of Alexander's model it could not be called multiculturalism at all, not to mention the kind of multiculturalism discussed at the beginning of this chapter. What is lacking is (1) active encouragement and enabling of ethnic and religious minorities to contribute to the creation of a new national culture; (2) the recognition of groups with their own group-specific rights. It is also worth noting that “[t]hrough the late 1970s and into the mid-1980s, multiculturalism was critiqued by members of ethnic minority communities who deeply resented its implicit paternalism” (Abbas 2005, 158).

Some scholars who have written about British multicultural policy have argued that at the turn of the millennium there was a short period of time when government actions aimed at better recognition of minorities. Abbas (2005, 158), for instance, argues that “New Labour was keen to embrace Britain’s multicultural and ethnically diverse mix of people”, while Back et al. (2002, 446) write that “New Labour was keen to present a commitment to ... embracing diversity and valuing cultural mix”. Joppke (2004, 249) goes even further, suggesting that in 2000 “British multicultural orthodoxy” was affirmed in the publication of the Runnymede Trust Commission’s report, *The Future of Multi-Ethnic Britain*.

But as Joppke (2004, 250) writes, “[t]his reassertion of orthodox multiculturalism proved rather short-lived”. For instance, Home Secretary Jack Straw publicly dissociated himself from the findings of the Commission (Abbas 2005, 158), and soon thereafter the Labour government declared that it was time to move ‘beyond multiculturalism’ (*The Economist* 2001; in Joppke 2004, 251).

In the light of this information, it is relevant to ask whether there ever existed a policy that could be called multiculturalism at all. There may perhaps have been a change of tone at the rhetorical level; in practice, however no major changes occurred during the brief period of ‘orthodox multiculturalism’ indicating an actual response to minority claims.¹⁴

What, then, did this new political course, of going ‘beyond multiculturalism’, mean? How can British multicultural policy in the following era be defined? In the previous chapter I argued, first of all, that articulated national identity is strongly based on Western values, secondly that even when cultural plurality is welcomed, cultural practices that conflict with these values are not regarded as legitimate. Another important feature of the documents dealing with cultural plurality and immigration is that the government wanted to increase the sense of belonging and mutuality among citizens in the name of a more functional and secure society. In the Government White Paper *Secure Haven, Safe Borders* (2002), it is argued that “[c]ommunity cohesion and commonality of citizenship is weak” (Home Office 2002, 10 par 7), and that “[i]n an increasingly diverse world, it is vital that we strengthen both our sense of community belonging and the civic and political dimensions of British citizenship” (Home Office 2002, 11 par 9). Another White Paper, *Improving Opportunity, Strengthening Society: The Government’s strategy to increase race equality and community cohesion* (2005), sets the goal of creating ‘a cohesive society’ that would “help people

¹⁴ The most important change – keeping in mind the purposes of this enquiry – was the granting of public funding to two Muslim schools. Another change that is referred to in the scholarly debate is dropping the ‘primary purpose’ clause in immigration rules, which prevented people from marrying a spouse from overseas if the main purpose was to settle in Britain. (Abbas 2005, 158; Back et al. 2002, 446.)

from all backgrounds to come together and develop a sense of inclusion and shared British identity” (Home Office 2005, 11 par 9).

The idea of creating a cohesive society naturally means an effort to strengthen bonds among citizens; in other words, to encourage citizens become closer to each other. Now, the essential question is, *why* is there a need for this? The underlying threat is a society that is fragmented into sub-groups, each with its own vision of the good life and values to be followed:

In many areas, the diversity within and between communities has been a source of rich cultural interactions, but in other areas segregation has led to people leading ‘parallel lives’ with little interaction (Home Office 2005, 20 par 14).

The reports into last summer’s disturbances in Bradford, Oldham and Burnley painted a vivid picture of fractured and divided communities, lacking a sense of common values or shared civic identity to unite around (Home Office 2002, 10 par 6; see also 22 par 1.7).

This idea is also explicitly stated for example in ‘Terrorism and Community Relations: The Government’s Response (Presented to Parliament by the Secretary of State for the Home Department by Command of Her Majesty)’, 2005. According to this document, the analysis in the Cattle report (*Community Cohesion*), in which one of the key issues was found to be the need to overcome segregation, remains valid (House of Commons Home Affairs Committee 2005, 3). It is clear that in the eyes of politicians the policy of *laissez-faire* in interaction among groups has not succeeded as hoped.

One reason for segregation is that members of minority ethnic groups are not provided enough opportunities. The White Paper *Improving Opportunity, Strengthening Society* admits that “coming from a minority ethnic community appears to carry added disadvantages (Home Office 2005, 19 par 9) and that deprivation and lack of opportunity have been significant contributory factors to the riots in the summer of 2001 (Home Office 2005, 19 par 11). Likewise ignorance about British life or language “may contribute to problems of polarisation between communities” (Home Office 2002, 32 par 2.11).

Another threat to cohesion is that posed by extremists who seek to promote hatred and divide communities. According to the Government, “some worrying developments” of this phenomenon can be found in British society. (Home Office 2005, 21 par 14.)

What, then, are the characteristics of a cohesive society? First of all, all citizens are expected to contribute their share or fulfil their responsibilities. The White Paper *Improving Opportunity, Strengthening Society* (2005) expresses this as follows:

When a community feels that some groups are not contributing, divisions will increase. That is one of the reasons why, for example, we have made clearer the expectations we have of new British citizens, including language skills and a test of knowledge of life in the UK. (Home Office 2005, 42 par 4.3.)

We also find a reference to a psychological dimension: “It is important that people feel that this approach works in practice, for everyone in society” (Home Office 2005, 42 par 4.3).¹⁵

There are several ways in which citizens can fulfil their responsibilities, that is, “play their part in society” (Home Office 2005, 42 par 4.3). The explicitly stated “essential elements of Britishness” are respect for others and the rule of law, tolerance, mutual obligations among citizens and the necessary language skills (Home Office 2005, 42 par 4.4). However, there is more to it than that. The report also declares that people from different backgrounds should know and understand each other; furthermore, while “[i]n a diverse society, inevitably there will be differences in values and ambitions”, citizens must understand that “differences in values and customs need to be resolved through negotiation” (Home Office 2005, 42 par 4.4).

Here we see a similarity to Rawls’ idea of the virtues of the ‘reasonable’ citizen: in this process of negotiation, “[n]o one set of *cultural values* should

¹⁵ The argumentative structure of the White Paper goes as follows: P1 & P2: Compared to many societies, Britain has done well to build a sense of inclusive membership, among both the majority and minorities (Home Office 2005, 20 par 13). However, inequalities exist among members of the British society. For example, while many members of Black and minority ethnic communities already do well in Britain, “many still suffer particularly poor outcomes in education, employment, health and other life chances, for a complex mixture of reasons, including racial discrimination, lack of opportunities ...” (Ibid, 8 par 3.) Furthermore, “[i]n many areas, the diversity within and between communities has been a source of rich cultural interactions, but in other areas segregation has led to people leading ‘parallel lives’ with little interaction” (ibid, 21 par 14). Tensions have developed between different ethnic groups (ibid, 19 par 11). P3: One problem, along with inequality, is that some groups are not contributing enough (ibid, 42 par 4.3). Furthermore, “[i]n a period of general economic and social change, there is some evidence that extremists who promote hatred are increasingly seeking to divide communities” (ibid, 21 par 14). P4: The reasons for these disadvantages are complex and mutually reinforcing, but “where experts have looked at these issues in depth – such as at employment – coming from a minority ethnic community appears to carry added disadvantages” (ibid, 19 par 9). Deprivation and lack of opportunity have also been significant contributory factors (ibid, 19 par 11). P5 & conclusion: In order to correct the situation, the government’s intention is to put “greater emphasis to promoting a sense of common belonging and cohesion among all groups ...” (ibid, 11 par 9), to reduce race inequalities (ibid, 8 par 4) and “to ensure that people are not discriminated against because of their race or religion, and that all can make a full contribution” to the British society (ibid, 8 par 2). As for the means to achieve the goal, “tailored approaches” are provided in order to meet “the specific needs of different minority communities, and to focus on those groups who still suffer particular disadvantage, rather than treating all minority groups as disadvantaged or having the same needs” (ibid, 19, 10i).

be privileged more than another” (Home Office 2005, 42 par 4.4; italics added).

In the White Paper *Secure Haven, Safe Borders* (2002) it is declared that the responsibilities of citizens should also be made clear to those who come from abroad: “The Government attaches great importance to helping those who settle here ... to understand the rights and responsibilities that come with the acquisition of British citizenship” (Home Office 2002, 29).

To return to the framing questions established above: it can be argued that the government’s aim is clearly to create a strong civil sphere (first question). By ‘strong’ I mean that every citizen is expected to take part, and that civic identity is definitely one major source of identity (see e.g. Home Office 2002, 32 par 2.11). This is grounded by referring to a hypothetical negative outcome:

Without this basic sense of common identity and commitment to participation, not only are these opportunities missed but, at worst, fear and conflict can develop. Achieving such cohesion is therefore important for all sections of society – Black and minority ethnic and majority populations. (Home Office 2005, 42 par 1.)

The fundamental basis for cohesion consists of commonly shared values (second question). They create the ‘centre’, to use the expression by Hartmann & Gerteis (2005, 227). Although citizens can hold different values in private, it is expected that in a situation of conflict common values will take precedence over individual cultural ones:

It will sometimes be necessary to confront some cultural practices which conflict with these basic values – such as those which deny women the right to participate as equal citizens. (Home Office 2002, 30 par 2.3.)

When it comes to citizens’ responsibilities (third question), in addition to active respect for core values, virtues that enable peaceful co-operation are also demanded:

[T]he values of respect for others and the rule of law, including tolerance and mutual obligations between citizens ... are essential elements of Britishness (Home Office 2005, 42 par 4).

The goal is to achieve a society where citizens have a strong feeling of solidarity (fourth question) and respect for each other: “We will ... strengthen the bonds of mutual understanding between people of diverse cultural backgrounds” (Home Office 2002, 11, par 9). The foundation of solidarity is formed by liberal virtues, such as tolerance, recognition, and the ability to

negotiate.

Question number five concerned the treatment of primordial qualities in the civil sphere. It could be argued that there are no indications that they should be shed when a person enters the public sphere. At least the following statements point in that direction:

People should not need to choose between their British identity and other cultural identities. They can be proud of both. (Home Office 2005, 20 par 13.)

[W]e will improve opportunities ... to develop an inclusive sense of British identity alongside their other cultural identities (Home Office 2005, 11 par 9i).

However, when it comes to the connection between religion and identity, the case is slightly more difficult. This is undoubtedly the hardest one for those religious people who cannot maintain the distinction. According to Modood (2003, 110), the political expression of religion should enter into the public discourse, since religion is “a key source of communal identity”. This form of primordial identity is seen as unwelcome in the civil sphere if its practices or values conflict with the nation’s central values.

The sixth question concerned how actively a nation is creating a new national culture, one which encompasses both minority and majority cultures and perspectives. Here we see clear limits, since the central elements of the civil sphere are already in existence.

The second pattern of questions (questions vii-x) are about how groups are treated in public. In the documents, groups are mentioned, but the main idea is obviously that while cultural background is acknowledged, the unit of incorporation is an individual (question number seven). However, the White Paper *Improving Opportunity, Strengthening Society* also perceives a need for

more sophisticated, tailored approaches to meeting the specific needs of different minority communities, and to focus on those groups who still suffer particular disadvantage, *rather than treating all minority groups as disadvantaged or having the same needs* (Home Office 2005, 19 par 10i; italics added).

It also states that it is now “time to move on from one-size-fits-all approaches to meeting Black and minority ethnic needs” (Home Office 2005, 19 par 10i). In this sense, it can be said that the way to achieve equality among individuals is to recognise the needs of those groups that are considered disadvantaged compared to the others, and to give them special attention. The White Paper also states the following:

because diversity is such an important feature of British society, our approach to meeting the needs of a range of different minority ethnic communities is very much to build provision for such diversity (and differing needs within the majority population) into our overall vision for good public services (Home Office 2005, 29 par 2).

In addition, a number of public services have set themselves further objectives, both to reduce disadvantage and inequalities as a whole (which will help disadvantaged members of Black and minority ethnic groups as well as other disadvantaged population groups) and to meet the *specific needs of minority ethnic groups* (Home Office 2005, 29 par 4; italics added).

Viewed from this perspective, group membership is seen as a source of public recognition (question number ten). It is worth noting that the Paper refers chiefly to Black and ethnic minority groups. Religion is not singled out as a basis for group identity. The overall goal of incorporation, however, is equality between individuals (question number eight). This is clearly expressed in the same White Paper:

But such a cohesive society relies on more than equal opportunities for individuals. It also relies on a number of social conditions that help people from all backgrounds to come together and develop a sense of inclusion and shared British identity defined by common opportunities and mutual expectations on all citizens to contribute to society. (Home Office 2005, 11 par 9.)

Finally, when it comes to the question of who bears the responsibility for preserving a distinct cultural identity (question number nine): there is nothing in the documents to suggest that the state is seen as having any obligation in this matter. This, however, is not to say that for example religious groups are not recognised at all as bearers of certain group-specific rights, enabling them to preserve their distinct culture. For example the Jews and the Sikhs are recognised as ethnic groups, and are seen as entitled to some group-specific rights (Barry 2001). But this is a rather exceptional arrangement and does not apply to all groups equally. Modood (2003, 103-104) points out that British courts do not accept Muslims as an ethnic group. Koopmans et al. (2005, 177) note that a significant number of British Muslims' group demands are made within the race relations framework; if Islam were categorised as an ethno-religion, these claims would easily be accommodated. According to Modood, the under-representation of Muslims is an indicator of inequality (Modood 2003, 104), and means that "Muslim identity is seen as an illegitimate child of British multiculturalism" (Modood 2003, 110).

To return briefly to the question posed in the previous chapter, as to lessening vs. exaggerating differences among citizens or cultural groups: it can be argued that the effort is clearly to make citizens similar to a certain

degree. They are all expected to adopt a civic identity and to possess virtues that enable peaceful co-operation. This expectation of course also assumes that citizens *can* become alike in this matter. Thus cultural differences at the level of values are diminished, in the sense that in some cases citizens are expected to place the values of the society above their own cultural values.

The Netherlands

As mentioned in the previous chapter, since the 1960s the Netherlands has accommodated a vast number of immigrants. In the late 1970s and early 1980s it became apparent that immigrants were not just passing through but were there to stay. It thus became important to formulate an official immigration policy. The result, the Dutch *ethnic minority policy* presented in 1983, applied to Turks, Moroccans, Southern Europeans, Moluccans, Surinamese, Antillians, refugees, Roma and Sints, and caravan dwellers (Vermeulen and Penninx 2000, 20). The policy was based on an expansion of the old idea of pillarization.¹⁶ According to the government's White Paper, *A memorandum on minorities (Minderhedennota)* (1983), the policy was "aimed at the realization of a society in which the members of minority groups that live in the Netherlands individually and as a group have an equal place and full opportunities to develop themselves" (*Minderhedennota* 1983, 10; cited in Musterd et al. 1998, 33).

The official slogan of the ethnic minority policy was "integration while preserving one's own identity". The idea of "cultural equality" was referred to in various policy documents; the overall goal was that immigrants could not only preserve their own culture but also receive support for their social emancipation within that culture. (Karsten 2006, 27-28.) As a means of preserving their culture and group integrity immigrants were given the possibility of using semi-autonomous institutions (Vasta 2007, 716). Thus the immigrants' special cultural character was not only recognised in principle but also taken into account in practice.

This *ethnic minority policy* lasted from 1983 until 1994. To locate this policy in the models of Alexander, Hartmann and Gerteis, and Bleich, it is clear that the state was at that time active in embracing diversity. Ethnic and cultural identities were not only recognised but public support was also made available to help minority groups preserve their distinct culture and group integrity. In Alexander's model of incorporation this arrangement resembles 'hyphenation'; outsiders were not only tolerated but were also given real possibilities to maintain their own culture. In the case of the Hartmann-Gerteis model we observe similarities to 'fragmented pluralism', in the sense

¹⁶ In the previous chapter I presented the Netherlands' unique system of pillarization, based on the idea of making it possible for groups who maintain different religious beliefs, especially Catholics and Protestants, to create their own institutions.

that groups played a strong role as a basis for association. With regard to the question of the creation of public culture, however it is debatable whether minority cultures were in fact actively encouraged and given real opportunities to create a new common culture. In this sense, and in reference to Bleich's model, the ethnic minority policy thus resembles passive multiculturalism. For instance Vasta (2007, 735) argues that the kind of strong multiculturalism in which minority groups are guaranteed social equality and cultural recognition has never actually existed.

In the early 1990s the meaningfulness and functionality of the ethnic minority policy came under question. In 1991 the parliamentary Liberal Party declared that the Netherlands should not accommodate certain practices carried out in the name of religion, and that tolerance should not be extended to intolerance. Moreover, the functionality of the minority policy became the subject of wide public discussion. It was argued that the ethnic policy not only fuelled segregation and separation from mainstream society but also had caused immigrants unemployment and economic marginalisation. (Karsten 2006, 28.)

As a result, a new *integration policy* was introduced in 1994. It differed from previous policy in emphasising integration and citizenship. (Enzinger 2003, 72; Musterd et al. 1998, 33-34.) In the government's White Paper, *A report for integration policy for ethnic minorities (Contourrennota integratiebeleid etnische minderheden)* (1994) the concept of citizenship was elevated as the guiding principle for the new vision for the presence of people from different cultures, even though the document did not give a precise definition for the concept. (Enzinger 2003, 75). The new policy was based on the idea that immigrants are regarded as 'individuals', who were to be, as the name of the policy implies, integrated into mainstream society. It was no longer seen as the state's responsibility to uphold parallel institutions or to support the separation of different groups. The overall goal was the equal and full participation of individuals (and groups) in society. (Joppke 2004, 248; Vasta 2007, 717.) Similarly to Sweden, it was made clear that "the members of minority groups should decide for themselves whether and, if so, to what extent they would like to retain and further develop their cultural identity" (Enzinger 2003, 72).

The White Paper specified concrete actions to achieve better integration, such as obligatory language and social orientation courses designed to familiarise immigrants with Dutch culture. The new law, the Civic Integration of Newcomers Act (1998), prescribes the responsibilities of incomers, and stipulates that immigrants who fail to attend these classes will be deprived of their welfare benefits. (Vasta 2007, 718.)

As mentioned in the previous chapter, criticism directed against immigration increased at the beginning of the 21st century. In 2002 an all-party parliamentary report, the Blok Report, concluded that the attempt to create a multi-ethnic society had failed (Enzinger 2006, 137). In 2004 the

government issued a statement:

[t]he integration obligation will only have been met as soon as people have successfully passed their examination ... The newcomers and the settled immigrants will be in charge of their own integration ... If a newcomer has failed to integrate after five years an administrative fine will be imposed.. (The Dutch Ministry of Justice 2004; cited in Vasta 2007, 718.)

In 2005 a proposal for a new Integration Act was introduced in the Dutch Parliament, specifying obligations, responsibilities and possible sanctions. (Vasta 2007.) The Act came into force in January 2007.

In conclusion, it could be argued that when it comes to the current strategy for dealing with diversity, the case of the Netherlands has a lot in common with that of Britain. The tendency is to strengthen the common elements of citizenship. The aim of integration is to make the civil sphere thicker, in the sense that all newcomers are expected to integrate into the society, become familiar with Dutch culture, and achieve the necessary language skills (question number one). Furthermore, all citizens are expected to share the core values of the society, regardless of their cultural background. Consider, for example, the statement made in 2009 by the Justice Minister Ernst Hirsch Ballin, concerning Sharia (Islamic) law. According to Ballin, some aspects of this law, such as differences between men and women or practices relating to divorce, are not in accordance with the values and laws of the Netherlands. Thus, Ballin argues, it is the government's duty to ensure the absence of a "parallel society in which people take the law into their own hands or maintain their own legal system which operates outside the framework of our own legal system" (Dutch News 2009).

Vasta (2007, 732-735) argues that a shift has occurred in the Netherlands, from multiculturalism to assimilation. Here she is referring to the French model of assimilation, "based on the central idea that by becoming integrated into political community as French citizens, minorities will assimilate into a dominant culture based on linguistic homogeneity and civic nationalism" (Vasta 2007, 735). This all indicates that the role of norms or values involves more than serving as a fair playing field among citizens (second question). Enzinger (2003, 82) writes:

The extreme cultural relativism, which lay at the basis of Dutch multiculturalism in the 1980s, has lost ground to the notion that ... it is the task of the public authorities to protect and defend existing values and practices. ... Of course, this does not necessarily mean that there is no room for pluralism, but the dominant values clearly set the pace.

It is also obvious that in order to be able to function in society, new citizens need to accept the fact that it is their responsibility to internalise relevant information about society and learn the language (third question). In the next two chapters, I show that when it comes to educational arrangements designed to take into account the plural nature of a society, all pupils are expected to acquire knowledge about other ways of life and to participate actively in the democratic decision-making process.

With regard to the treatment of primordial qualities (fifth question), there is nothing to suggest that these are to be shed in the public sphere, except in cases where the immigrant identity, or an essential part of it, conflicts with the values of the public culture.

What, then, about giving immigrants the opportunity to enrich the public culture (question number six)? In my analysis of the *ethnic minority policy* above, I expressed doubt as to whether minority cultures were actively encouraged or given real opportunities to create a new common culture. There is nothing to suggest that anything has changed in this respect; in fact, quite the opposite. According to Enzinger (2003, 85), the current Dutch policy is “based on a static interpretation of culture, rather than on a dynamic one”, and serves “to protect traditional values in Dutch society from new outside impulses”.

The *goal* of incorporation is equality among individual citizens (question number eight). The Dutch government does not recognise any obligation to uphold parallel institutions of different groups (question number nine). The aim is to move from recognising groups towards the idea that the unit of incorporation is the individual (question number seven). As Enzinger (2006, 132) writes: “acknowledging religious and ethnic diversity is no longer considered a public responsibility, let alone facilitating its institutionalization.”

However, Koopmans (2003, 4) questions whether this kind of policy has actually succeeded: while the intention is to implement equal opportunity measures on universal principles, “organizations and activities based on ethnic and religious grounds are still generously supported – directly and indirectly – by the government”, and ethnicity and religion play an important role in public institutions. The government for example finances schools, hospitals, media channels, social work etc. on a religious basis. According to Koopmans, the Dutch system is

one in which the state does not interfere in religious matters – although it pays for them – and in which religious organizations play a key role in areas that, in other countries, are the sole domain of the state. (Koopmans 2004, 4.)

Thus it can be argued that in the Netherlands culture-based identity is a source of public recognition (question number x). In the case of Great Britain we saw that it is sometimes necessary to focus on those groups which still

suffer particular disadvantage (Home Office 2005, 19 par 10i; italics added). In the case of the Netherlands it seems that groups can ask for public recognition because other groups already have certain rights. According to Koopmans (2003, 4), for example the claims of Muslims are mainly based on reference to other religious groups:

If anything, Muslims have not misunderstood the Dutch system, but as non-Christians they demand nothing more than the same rights traditionally granted to a host of Christian *groups* – they do so in accordance with the principle of equality in the Dutch constitution.¹⁷ (Italics added.)

In sum, it can be said that while the intentions of policies in Great Britain and the Netherlands are quite similar, the Dutch system is still more sensitive to recognise individuals as members of a group.

Sweden

In an article entitled ‘Rhetoric, Practice and the Dynamics of Institutional Change: Immigrant Policy in Sweden, 1964-2000’ (2004), Carl Dahlström writes that before the 1960s Sweden did not have a government-defined policy for the treatment of immigrants. The 1960s, however, witnessed a dramatic increase in immigration, and the issue became a topic of daily debate in the press. (Dahlström 2004, 288; 296; 300.) In the debate two main lines of thought occurred: some writers were in favour of a multicultural society (*flerkultursamhälle*), in which the state has the role of supporting immigrant cultural activities, while others were in favour of mixed culture society (*blandkultursamhälle*), where there is no need for the state to support such activities. (Dahlström 2004, 296¹⁸.)

Eventually, the Swedish parliament had to decide on the general direction of its policy towards immigrants. The first official policy statement was issued in 1975, under the title of *Immigrant and Minority Policy* (Riksdagen 1975; see also Dahlström 2004, 296-297; Graham 1999, 103; Soininen 1999, 687). Three major goals of this policy were explicated in the government’s White Paper, *Government proposal for guidelines on immigration and minority policy (Regeringens proposition om riktlinjer för invandrar- och minoritetspolitiken m.m.)* (1975). These goals or principles were ‘equality’ (*jämlikhetsmålet*), ‘freedom of choice’ (*valfrihetsmålet*), and ‘partnership’ (*samverkansmålet*) (Riksdagen 1975, 15-16). They were

¹⁷ As noted above, in Great Britain the case is different in the sense that group-specific rights are granted to ethnic groups. However, while the Jews and the Sikhs are recognised as ethnic groups, and entitled to some group-specific rights (Barry 2001), Muslims are not.

¹⁸ Dahlström refers to Hansen (2001).

derived from the report of a government commission on immigration, the Invandraretredningen (IU). The IU defined the objective of 'equality' as meaning that immigrants and their children should be offered "real opportunities" for maintaining and "in the same way as the majority population, keeping and developing their languages and their traditions" (SOU 1974:69, 95; cited in Dahlström 2004, 297-298).

In Sweden's first official immigrant policy, the cultural rights of minorities were thus recognised. The White Paper states that immigrants and their children should be given a real chance to retain their own language and practice their cultural activities:

[T]he various immigrant groups [should] receive financial and other support to develop their own cultural activities so that the overall cultural range in Sweden improves. (Riksdagen 1975, 15.)

In concrete terms, this meant that an immigrant group that included more than 1000 persons qualified as an "ethnic minority". Their cultural affairs were protected by actions such as mother-tongue education, their own TV and radio stations, support for ethnic newspapers, periodicals, and other cultural activities. (Joppke & Morawska 2003, 13.)

One point worth noting is that the Constitution of Sweden declares that "[o]pportunities should be promoted for ethnic, linguistic and religious minorities to preserve and develop a cultural and social life of their own" (Riksdagen 1974, Chapter 1 art 2[4]).

Can this policy be called one of 'multiculturalism'? Locating it in the models of Alexander, Hartmann & Gerteis and Bleich, we can reach rather similar conclusions as in the case of the Netherlands. In Alexander's model, the treatment of minority groups would fall under hyphenation: foreigners' identities are publicly recognised but there is no expansion or modification of the civil sphere. In Bleich's model the policy would resemble passive multiculturalism, since there is no true effort to enrich the dominant culture. Placing it in the model of Hartmann and Gerteis, it is obvious that immigrants' group membership is seen as an important source of identity. In this sense, the basis of association is the group. However, while the policy focuses on mutual recognition and a respect for difference, there is still a single strong, central national culture. Thus the policy cannot be defined as a pure case of interactive pluralism.

Sweden's *Immigrant and Minority Policy* lasted for a decade. In 1986 the Swedish Parliament added some clarifications to the guidelines of the 1975 parliamentary decision. In the previous chapter, I described parliamentary actions making it more explicit that the goal of 'freedom of choice' did not leave room for practices deviating from the basic values expressed in Swedish legislation and political decisions (Riksdagen 1986, 20-21). Another clarification in the Swedish policy for dealing with cultural

difference was to change the status of immigrant groups: these groups were now no longer equated to 'ethnic minorities', namely the native Sami and the Tornedal Finns of northern Sweden, whose interests were protected by the Constitution and who enjoyed group-based rights. (Soininen 1999, 689.) Thirdly, it was declared that the government had legal responsibility for immigrants but no responsibility for their culture (see Dahlström 2004, 288).

In the 1990s, concerns about the exclusion of immigrants from the labour market and about their increasing segregation forced the government to act toward a more unified nation. According to government's White Paper, *Active refugee and immigration policy (Aktiv flykting och immigrationspolitik)* (1991), ethnic communities may protect themselves from the pressure of the majority "by building cultural defences against the outside world" (Riksdagen 1991a, 81). The document also saw a need to move forward: from questions focusing on immigrants, such as defining the limits of the policy goal 'freedom of choice' (Riksdagen 1991a, 81), to questions as to how to achieve equality among citizens (Riksdagen 1991a, 83). It is argued that the plural nature of a society should be seen as a shared concern:

[W]e should strive for better ethnic representation. The best way to handle questions related to culture or ethnicity is to create an environment in which people from different ethnic backgrounds can take part (Riksdagen 1991a, 83).

After 1997, Swedish immigration policy can be seen as an *integration policy*. The Parliament adopted a White Paper entitled *Sweden, the future and diversity: from immigration policy to integration policy (Sverige, framtiden och mångfalden – från invandrapolitik till integrationspolitik)* in which the leading idea was the universal treatment of citizens (Riksdagen 1997). It is admitted that the old immigration policy has been unsuccessful (Riksdagen 1997, 17); on the contrary, it has reinforced the "breakdown of the population into 'us' and 'them' and thereby contributed to the emergence of the alienation that many immigrants and their children experience in Swedish society" (Riksdagen 1997, 18).

As concrete action to combat social exclusion and segregation, the new policy stressed that all citizens should receive equal rights and opportunities regardless of their ethnic or cultural background. Along with equal rights, equal obligations were also stressed. The goal was a community in which all citizens tolerated and respected each other, and regardless of background would not only be involved in the society but would also feel responsibility for it. (Riksdagen 1997, 23.)

Along with a new policy, the idea a society as a system of ethnic groups participating on equal terms was thus abandoned. The 1997 White Paper stressed that policies directed specifically at immigrants as a group should be limited to actions and measures that might be needed in Sweden during the

early, transitional period. (Riksdagen 1997, 19.) It was also explicitly stated that “[c]ultural identity is primarily a matter of the individual” and that the society should therefore make it easier for an individual to integrate old and new patterns of life and lifestyles in the way he or she wishes. This was seen as a prerequisite for the citizen to develop a coherent identity [en hel identitet] and be proud of their background. (Riksdagen 1997, 23.)

The White Paper also noted that the government has already initiated a dialogue between different groups concerning certain controversial issues, such as gender equality. By the same token, however, the idea is clearly expressed that gender equality is one of the fundamental values of Swedish society. (Riksdagen 1997, 24.)¹⁹

In the previous chapter I suggested that while the population was regarded in Sweden as a whole, a distinction was nevertheless made at the level of culture, between the national culture and immigrant cultures. It was the dominant Swedish culture that was seen as entitled to protection. (SOU 1996:55, 353-354; in Graham 1999, 120.) The government did not bear responsibility for the development of other cultural traditions or heritages, or for their transmission to successive generations. The preservation of immigrant cultures was left to individuals. Thus the state remained a guarantor of the social and political rights of immigrants, but not of their cultural rights. (Soininen 1999, 689-691.) The document also states that it is in the nature of a multicultural society that cultures – whether it is the majority or the minority culture – cannot be intact and remain the same (SOU 1996:55, 354; in Graham, 120).

In 2008 the Swedish government published a policy paper under the title *Empowerment against exclusion: Government strategy for integration (Egenmakt mot utanförskap – regeringens strategi för integration)*, according to which the goals of future integration policy should be consistent with those previously endorsed: rights, obligations and opportunities for all, regardless of ethnic or cultural background (Riksdagen 2008, 33). The document

¹⁹ The argumentative structure of the White Paper is as follows: P1: The first Swedish official immigration policy was directed towards a group. It was partly created as a specific policy for ethnic groups. Most immigrants had come to Sweden as migrant workers. (Riksdagen 1997, 17.) P2 & P3: Immigration policies, together with the special administration that was created to implement it, has reinforced the breakdown of the population in an ‘us’ and a ‘them’, and has thereby contributed to the sense of alienation that many immigrants and their children experience in Swedish society (ibid, 18). P4: The goal of ‘freedom of choice’ created expectations of a specific policy for ethnic groups, and has been seen as a threat to the Swedish national character (ibid, 18). P5: Equal rights and opportunities for all, regardless of ethnic or cultural background, should be an overarching goal of integration policy (ibid, 23). The society should be characterised by mutual respect and tolerance, and everyone, from any background, should be involved in and jointly responsible for the society. Swedish society should be based on plurality. (Ibid, 21; 23.) Conclusion: Policies directed specifically at immigrants as a group should be limited to actions and measures that may be needed during the transitional period (ibid, 19).

declares that “the Swedish society is characterised by an increasing diversity in the population of various ethnic and national backgrounds, religions, cultural expression and individual life choices”, and that this situation is liable to cause conflict among citizens with incompatible value systems, goals and ambitions. The future integration policy should thus help to prevent and manage these conflicts; the starting point for the “government’s efforts in this area is that respect for fundamental values, such as human rights, democratic governance, and equality between men and women, is maintained and enhanced.” It is also recognised that community cohesion needs to be strengthened and exclusion should be stopped. (Riksdagen 2008, 59.) One way to strengthen unity among citizens is to promote and support dialogue: everyone, regardless of background, “should be given opportunities to participate in a dialogue on our common values.” Dialogue is seen as one way to bring about a better understanding of democracy and human rights. (Riksdagen 2008, 60.)

It is time to summarise the main outlines of Swedish immigration policy and compare it to the policies of Great Britain and the Netherlands. As Soininen (1999, 693) points out,

scholars around the world have often been positive about the Swedish immigrant policy. ... In international comparisons the Swedish legislation is noted for its generosity both in terms of the social rights of immigrants and their opportunity to influence politics.

One reason for this is the fact that the Swedish policy for the treatment of immigrants “comprises a *corporatist policy-making style*”, in which “interest organisations comprise a channel through which interests are represented” (Soininen 1999, 686). This model is seen as an appropriate means both to achieve equality among ethnic groups and to preserve their collective identity (see Soysal 1994, 79-82).

This conclusion, as Soininen rightly observes, may be true in theory, but in practice the case is different. It can be argued that the Swedish case shares similar features with that of the Netherlands. First of all, the former policy of giving immigrants the possibility of creating a society divided into sub-groups has had unwanted consequences, in the form of unemployment, marginalisation, and – not least – confusion as to which values should be respected. Thus government actions have aimed at a more unified, cohesive society that would safeguard every citizen’s ability to function in all sectors of society. The goal of creating a thick civil sphere, whose essential features would become part of every citizen’s identity, is thus obvious (question number one). One interesting finding is that the distinction between the national culture and the civil sphere is not that clear. In the previous chapter I suggested that ‘Swedishness’ is located in social order, in the basic values of democracy and the equal rights, and the value of each individual (SOU

1996:55, 354; in Graham 1999, 120). However, there are also hints that citizens should adopt parts of the dominant culture in order to be able to function in society. For instance, the National Curriculum for primary schools declares that “[a]wareness of one’s own cultural origins and sharing a common cultural heritage provide a secure identity” (Swedish National Agency of Education 2006, 4).²⁰

With regard to the question of the role of society’s core values (question number two), it can be argued that they are not only procedural norms but also serve as moral bonds:

A nation’s history often serves as a connecting link between people. Since a large group of people have their origin in another country, the Swedish population lacks a common history. Current belonging to Sweden and commitment to the society’s fundamental values matter more for integration than a common history. (Riksdagen 1997, 23.)

These fundamental values should be internalised as part of daily decision-making. It is the citizens’ responsibility to adopt these and function according to them (question number three). This responsibility extends to adopting virtues such as respect and tolerance. The 1997 White Paper *Sweden, the future and diversity: from immigration policy to integration policy* declares that members of the majority always bear special responsibility towards those in the minority (Riksdagen 1997, 24). In this connection reference is also made to the parliamentary White Paper *Kulturpolitik (Cultural policy)* (Riksdagen 1996), which stresses that one important prerequisite for greater tolerance and understanding for people who come to live in Sweden and for their cultural heritage is for the majority to learn about different ways of life (Riksdagen 1997, 66).

With regard to the treatment of primordial qualities (fifth question), we can infer that citizens are not expected to shed them. Rather, it is seen as necessary to combine old and new patterns of life and lifestyles in order to achieve a coherent identity. The nation is also active in promoting the enrichment of the public culture, encouraging lively debate and creating opportunities to encounter people who are different (question number six). (Riksdagen 1997, 24.) The plural nature of a society should also be reflected in the society’s institutions and in the democratic decision-making process (Riksdagen 1997, 24); there is a need to create “cross-over activities and common meeting places” (Riksdagen 1997, 25).

Similarly to Great Britain and the Netherlands, the unit of incorporation is the individual (question number seven), and equality is only seen as equality among individuals (question number eight). The granting of collective rights, such as funding the preservation of immigrant culture, is not seen as the state’s responsibility (question number nine).

²⁰ I return to this issue in Chapter 5.

Before concluding the Swedish case, I want to give an example of the practical consequences of reaffirming the importance of the society's values. The state has recently become more assertive about protecting individual rights when they conflict with cultural norms and practices. This is especially the case when we are dealing with religious norms and practices. The Minister of Education and Research Jan Björklund and the Minister for Integration and Gender Equality Nyamko Sabuni published an article in the leading Swedish daily *Dagens Nyheter* for May 31 2009, in which they argued that the future Education Act (which came in force in 2011) did not allow exemptions from sex education or swimming or athletics classes. In writing that "a liberal and open society accepts and respects its habitants' life choices as long as these choices do not come into conflict with others' individual freedom" they were saying that parental authority should not override the child's right to gain knowledge and learn important skills (Björklund & Sabuni 2009).

Children's rights are discussed by the same politicians in another article as well. On March 6 2008 they commented in the op-ed pages of *Dagens Nyheter* that "even immigrant girls have the right to swim, to participate in sport classes and to receive sex education" (Björklund & Sabuni 2008).

The message sent by these ministers is essentially the same as Habermas' critique of Taylor's theory. Liberal rights are individual rights; thus collective rights, which would overtax the theory of rights tailored to individual persons, are not regarded as legitimate.

Denmark²¹

In the previous chapter I briefly discussed the Danish government's White Paper from 2003, *The government's visions and strategies for improved integration (Regeringens visioner og strategier for bedre integration)*, meant as a guide for Denmark's immigrant policy. The document starts with a short description of the demographic changes that have taken place in Danish society: nowadays many of those living in Denmark were not born in that country, or are the children of parents who were not born there. According to the White Paper, cultural diversity should be considered, in principle, as something positive (Regeringen 2003, 11). It is also recognised that many immigrants have become successfully integrated into Danish society. However, immigration has also led to problems, mainly because society's core values are challenged:

²¹ The material for Denmark is too scanty (I present only the main outline of one document) to allow any firm conclusions as to former and current policies similarly to the other three nations. However, the Danish government's White Paper presented here gives a coherent picture of how diversity is currently dealt with.

[A] number of integration problems can be attributed to the fact that many people with a foreign background, for obvious reasons, have other ideas about what is right and wrong, than those prevailing in Denmark.

There are still too many immigrants and refugees who live passively outside of the society – unfortunately this goes for the second generation as well. And there are still violations of society's fundamental values of liberty, duties, rights and equality for all, regardless of sex, colour or religious belief.

Many minority families live ... with traditional gender roles, where women and girls are not considered equal to men and boys. This means that there are many minority women living isolated at home, and especially young girls are subject to strong control by their families. (Regeringen 2003, 12.)

This situation is naturally perceived with anxiety. Even when a problem can be identified, it cannot be easily removed, for example simply by changing the law. According to the Danish government, this is because cultural habits and ideas about what is right and wrong are difficult to change. (Regeringen 2003, 12.) It is admitted that problems are largely due to "an earlier failure or lack of effort" (Regeringen 2003, 8), and to the lack of proper discussion as to the direction of a multicultural society and the consequences that arise when different cultures are represented within a society (Regeringen 2003, 12).

The White Paper sets the goal of achieving "a coherent and open society within which ... citizens demonstrate *responsible citizenship and an active respect for the [society's] values*" (Regeringen 2003, 8; italics added). Along with this goal, all citizens, regardless of ethnic or cultural background, should have equal opportunities to participate in and contribute to the society (Regeringen 2003, 8). When it comes to the question about immigrants' responsibilities, in addition to an active respect for the society's values they "should learn about our often different points of view, and to respect the society which they are to be part of" (Regeringen 2003, 4; see also 38). In connection with 'intercultural competence', citizens are expected to become aware of their own unwritten values and learn to accept that others do not necessarily see the world in a similar manner (Regeringen 2003, 16). It is worth noting that the White Paper recognises the need for a better dialogue between the majority and immigrants concerning morality, the principles of equality and freedom, and childrearing practices (Regeringen 2003, 13).

The document contains no references to the idea that groups should be given special attention. The section dealing with freedom of religion includes a brief discussion of special rights, stating that "it is in the public interest to grant such rights in order to create a framework for opportunities for people to express themselves" (Regeringen 2003, 33). There is no suggestion that these would be collective rights, in the sense suggested for example by

Taylor's theory. Quite the contrary: it is made clear that special rights should not be in any way harmful to the society. In sum, equality is considered solely as a matter among individuals.

We can conclude that the case of Denmark is similar to those of the other three countries presented above, in the sense that the objective is a strong civil sphere. Furthermore, citizens have similar responsibilities. They cannot ignore about what is going on in society. At a minimum, they are required to adopt society's values and to acquire knowledge concerning different ways of life.

Summary and discussion

In this chapter I have analysed policy documents to find out how Great Britain, the Netherlands, Sweden, and Denmark have dealt with and are currently dealing with cultural plurality. As noted at the beginning of the chapter, supporters of a 'politics of recognition' argue that egalitarian difference-blind treatment does not ensure equal status to minorities along with the majority, since minorities cannot protect their own cultural interests. The philosophical argument in favour of special treatment, namely the granting of group-specific rights, was introduced in detail through the theories of Will Kymlicka and Charles Taylor.

We have seen that this discussion on group rights is closely linked to the question of who should have the power to decide the content of education in the case of the children of religious groups that do not regard liberal values as valid. I also suggested that while Kymlicka's theory favours group rights, its scope does not extend to legitimising the demands of illiberal religious groups. By demanding more autonomy for religious groups, Taylor's theory thus seems more relevant. However, this theory seems to be difficult to apply in practice in modern democracies, since from a liberal perspective – as shown by Habermas's critique – it tends to undermine individual rights.

What, then, can be said as to how nations have dealt and are currently dealing with cultural diversity? Using the discussion of group rights, and presenting three models for the recognition of cultural difference – those of Alexander, Hartmann & Gerteis, and Bleich – I formulated certain framing questions, which I then answered with regard to each of the four nations. One conclusion is that while there has been a change in policy, at least at the level of rhetoric, in Great Britain, the Netherlands, and Sweden, the policy has never been something that could be described as active multiculturalism.²² It is true that immigrants have been recognised, for example in the Netherlands and Sweden, as bearers of a collective identity; nevertheless, different groups or cultures have never had a freedom of their own, as described under

²² The term should be understood in its most popular usage.

interactive or fragmented pluralism in the model of Hartmann and Gerteis or under *multiculturalism* in that of Alexander.

By the same token, it should also be noted that the four nations' current policies should not be seen as aiming at full assimilation or acculturation either. At the beginning of this chapter, I wrote that assimilation and acculturation are domain-specific phenomena and always take place with regard to a particular issue. Each nation's current policy of treating cultural diversity is based on two ideas: that segregation or fragmentation is an undesirable situation, and that a strong unified, cohesive society is a desirable objective. It is the effort of creating a cohesive society that involves active assimilation or acculturation, but government programmes for immigrant integration are mainly focused on the civil sphere. This means two things. First, citizens are expected to adopt the society's fundamental values as part of their civic identity. In Sweden and Denmark we also see an attempt to include historical cultural tradition as part of that identity. Here I also refer to the findings presented in Chapter 2. Secondly, it is seen as the citizens' responsibility to embrace a certain kind of attitude. Citizens should have virtues such as tolerance and respect, and they are also responsible for acquiring knowledge about other life choices. Citizens cannot ignore about what is going on in the society they live in.

This effort is not, however, equivalent to making citizens similar in other respects. Current policies do not mean that these nations are aiming at erasing cultural differences among citizens. It is left up to individuals to what extent they want to retain their cultural tradition – with the important exception that cultural practices that conflict with the nation's values are not tolerated. Here Sweden provides an illuminating example in protecting children's universal rights from the cultural practices they learn at home.

Finally, with regard to the interpretation of equality in these four countries; we can say that equality is mainly seen as occurring among individuals. It is stressed that all citizens should have equal political rights. In Great Britain, the Netherlands and Sweden, however, it is also realised that in order to achieve equality among citizens there is a need to support some groups. In the Netherlands culture-born identity receives public recognition, and both ethnicity and religion play an important role in public institutions (Koopmans 2003, 4). In Britain and Sweden, the disadvantaged position of some minorities is seen as entailing that certain groups may need special attention. In Britain, it is in fact explicitly stated that there is a need "to focus on those groups who still suffer particular disadvantage, *rather than treating all minority groups as disadvantaged or having the same needs*" (Home Office 2005, 19 par 10i, italics added). According to the Swedish government's White Paper, *Sweden, the future and diversity: from immigration policy to integration policy*, policies directed specifically at immigrants as a group should be limited to actions and measures that may be needed during a transitional period (Riksdagen 1997, 19). In all three

countries, however, the purpose of any such special attention to certain groups is not the preservation of a distinct ethnic or religious identity.

With regard to the issue of the ‘appropriate’ place of religion in these four countries, several conclusions can be drawn. First of all, in the documents presented here religion is almost completely invisible. In all four countries, issues related to religion receive only cursory attention in the documents. In Great Britain and Denmark religion is mentioned in connection with equality among citizens. In the White Paper *Improving Opportunity, Strengthening Society*, religion is mentioned in reference to the need to extend the scope of the Race Relations Act – which already protects Jews and Sikhs from discrimination in the provision of goods and services – to people of other faiths and those who do not belong to any religious group (Home Office 2005, 40 par 52). The Danish government’s White Paper, *The government’s visions and strategies for improved integration*, lists equal opportunities for all religious groups as one objective of immigration policy (Regeringen 2003, 33). In Denmark and Sweden, the principle of religious freedom and the right to practice religion under the constitutional framework are also mentioned as important rights of citizens (Regeringen 2003, 33; Riksdagen 1997, 68). The possible positive value that a religion can provide to those who come to live in the country from abroad is recognised in the White Paper *Sweden, the future and diversity: from immigration policy to integration policy: the role of religion in one’s life often increases when one leaves one’s home country. This is because religion provides a sense of security and of belonging.* (Riksdagen 1997, 68.)

However, it should be noted that despite these rights that are related to religion, nothing suggests that religion is a reason to expand the rights that are already granted to some or all citizens.

One interesting finding is that the documents, as well as opinions issued by politicians, contain references to religion in connection with undesirable attitudes or practices. In the case of the Netherlands and Denmark, it is Islam and its practices that are most often referred to in the context of contradictions between certain practices and the society’s norms. The point is that the states – including Great Britain and Sweden – are ready to intervene in the sphere of religion in case of a threat to the rights of individual citizens. In this sense religion is not regarded as an issue that should be left intact merely because it is normally seen as belonging to the private sphere.

However, when we look at the actions suggested to overcome the problems that religions are believed to cause, we can conclude that religion is not seen as an issue to be treated independently or apart from the overall approach to achieving a cohesive society. There is nothing to suggest that accommodating religious diversity needs special arrangements.

In the Chapter 1, I wrote, referring to Turner (2011, 103) that the states in the West “have become involved in the management of religions, thereby

inevitably departing from the traditional separation of state and religion in the liberal framework.” However, it should be noted that religion is explicitly and visibly considered as an issue that needs to be controlled only in some cases, such as women wearing headscarves or limiting the rights of women. As Lehmann (2006, 281) points out, empirical research has shown that certain features of religious practice, such as dress and sexual regulation, have “become political and their ethnic character is accentuated”. My point is that in these four countries a strategy used in order to control religion, conscious or not, aims mainly at regulating citizens’ attitudes. As argued in the previous chapter, it is the attitude towards fundamental principles that serves to define who is to be regarded as a legitimate member of the society.

In this chapter I have argued that the concept of ‘citizenship’ includes the idea that citizens should possess virtues such as tolerance and respect towards others. In addition, in the case of Great Britain it is explicitly stated that citizens should have the ability to negotiate in a peaceful manner when it comes to controversies among different value systems. In Denmark too the official documents refer to the idea of increasing intercultural competence, and to the need for a better dialogue among the majority and immigrants. In the case of Sweden, the government is reported as having initiated a dialogue between different groups.

Besides possessing certain attitudes, citizens are also required to acquire knowledge about other ways of life. The rationale of this kind of thinking is simple, but needs to be made explicit here. We can ask what purpose knowledge serves, or is supposed to serve, in this particular situation. I suggest the following: one underlying assumption is that by acquiring knowledge about other ways of life, not only will citizens’ understanding of the nature of society increase, but they will also become more ‘reasonable’, in the Rawlsian sense; in other words, they will understand that since different ways of life co-exist within a society, one cannot claim that one’s own should occupy a privileged position. For example the Danish government’s White Paper, *The government’s visions and strategies for improved integration*, declares that citizens need to learn to accept that others do not necessarily see what is worthwhile in similar manner (Regeringen 2003, 16).

In sum, it can be argued that in addition to visibly regulating certain religious practices, for example expressing clearly what kind of practices are not in line with the national ethos, the states are also departing from the traditional separation of state and religion in more sophisticated ways: by attempting to create a ‘liberal state of mind’ in their citizens. In this process, education plays an important role. I expand on this issue in the following chapters, when I investigate how the educational system is harnessed to produce citizens who have the virtue of being able to co-operate with each other.

In the previous chapter, I also asked whether society's core values are contrasted to cultural values, in the sense that the former are regarded not only as neutral but also as universal and 'eternal', while values that are *culturally* driven – for example the values of a particular religion – are regarded as contingent and changeable. There is no straightforward answer to be given. It is worth noting that in some cases it is recognised that the values of a particular nation, or general European values, are also culturally and historically driven and incorporate religious elements.²³ It can also be argued, however, that a society's values are presented as neutral, in the sense that they are seen as providing a context that is expected to be suitable for *all*. Finally, they are treated as universal, in the sense that they cannot be changed.

How, then, can these conclusions be applied in the context of Durkheim's theory of religion? It can be argued that Durkheim's ideas are topical in a situation of increased plurality and a lack of mutual bonds among members of different cultural groups in plural Western societies. As noted in Chapter 1, Durkheim (2001, 322) considers that in order to exist a society needs at regular intervals to "sustain and reaffirm the collective feelings and ideas that constitute its unity and its personality." I have shown that in the four countries studied here, fragmentation is perceived as a real threat. This in turn has led to efforts to bring about a change of course and increase uniformity among citizens. It is not believed that an 'invisible hand' will do the job of holding citizens together in a culturally diverse society. Programmes or plans have been launched to advance the integration of immigrants and to achieve better cohesion. The central purpose of these programmes is to create a thick civil sphere; the central concept in the discourse of the documents that I have explored is that of 'citizenship'. In sum, all four nations have focused on inducing collective feelings and solidarity among citizens, as well as on creating a 'new' identity, one that will accommodate all citizens.

There is one further argument that can plausibly be made: given that a society's values are seen as something that is not subject to any change or compromise, and given further that all citizens, without exemption, are expected to internalise these values and have faith in them, in the sense that they are seen as providing mutual trust and predictability, it follows that these core values of a society can be seen as representing 'the sacred'. For Durkheim, the alternation between two types of time – one individual, the

²³ In Denmark, Vestager has argued that the current society's values are driven by history (Danish Ministry of Education 2000, 7). Schwimmer (2001b) has claimed that the origins of what he calls 'European values' lie in Christianity, Judaism and Islam. In Chapter 5, I show that in Sweden it is also explicitly stated that the society's current values are influenced by the values and standards of Christianity. In Chapter 6 I present the view of the Council of Europe, according to which the values upheld by the Council stem from those of the three monotheistic religions.

other collective – is the social origin of the distinction between the profane and the sacred. I have argued that while citizens may have values of their own, the core national values are expected to form a framework or act as the foundation for a social structure. This framework exists independently, outside the individual, but at the same time exerts a significant moral force over the life of the individual, since citizens are expected to experience the society's core values as obligatory to follow.

Finally, it should be noted that all four nations perceive a need to achieve a strong centre, along with creating moral bonds between citizens; in this process, the idea of a homogeneous culture, whether or not it has ever actually existed, serves as an implicit prototype or goal to aim for. None of the four countries regards as a thinkable future scenario a society built on models such as Hartmann & Gerteis's *cosmopolitanism* or *fragmented pluralism*.

Chapter 4

Social cohesion and education

Introduction

In this chapter I explore the practical consequences of promoting and maintaining social cohesion in the field of education. The term ‘cohesion’ can mean several things. In the documents presented and discussed in the previous two chapters, the following seven themes have emerged as elements of cohesion: (1) all citizens share the core norms and values of a society; (2) citizens share a common (civic) identity, (3) citizens feel attached to a common community; (4) citizens acknowledge their responsibilities towards the society; (5) citizens respect each other; (6) there is equitable distribution of rights; and (7) there is a strong civil sphere with active citizens.¹ For example the definition of community cohesion given in the British guidebook for schools to promote cohesion, *In Guidance on the duty to promote community cohesion* (2007), includes almost all these features:

By community cohesion, we mean working towards a society in which there is a **common vision** and **sense of belonging** by all communities; a society in which the diversity of people’s backgrounds and circumstances is appreciated and valued; a society in which similar **life opportunities** are available to all; and a society in which strong and positive relationships exist and continue to be developed in the workplace, in schools and in the wider community. (Department for Children, School and Families 2007, 3; emphasis in original.)

In this thesis, the term ‘cohesive society’ thus means that citizens live together in harmony under basic liberal values and norms, respect each other’s rights and contribute actively to the society (see e.g. Jane Jensen’s 1998 definition in Green et. al 2003, 455). I want to stress here that the increased need to foreground the importance of cohesion is due to the fact that societies have become more plural, containing different – and undoubtedly conflicting – views of life. Moreover, it is not diversity as such

¹ The list of common characters of cohesion given by Green et. al (2003, 455) is almost identical with this list.

that has been received with anxiety, but those belief systems that contradict society's basic values.

In the previous chapter I argued that the current interpretation of the equal treatment of citizens means that it is not regarded as the state's responsibility to enable citizens to manage their distinctive cultures. The description (cultural plurality) does not entail prescription (the need to maintain the situation as such). In this sense, cultures belong to the private sphere. Thus the idea of granting some people collective rights due to their membership in a specific group is not regarded as necessary. Quite the contrary, special rights are seen as a possible cause of segregation.

I start with a brief historical overview of the development of the educational system in Great Britain, the Netherlands, Sweden and Denmark. I then discuss the possibilities of faith schools to accommodate and promote a religious way of living. My purpose is to explore how the trend of promoting cohesion has changed the political way of thinking about the task of education and in particular its content. What is interesting is that in all four countries the structure of the educational system makes it possible for parents to place their child in a school where the content of the curriculum is consistent at least to a certain degree with their religious beliefs. I want to find out whether this possibility has changed in recent years.

The theoretical framework for my analysis is derived from the scholarly debate over the question whether or not faith schools can generate social cohesion. The answers can be roughly divided into two camps: those scholars who see a disparity between the aims of faith schools and enabling pupils to develop the capacities needed to live in a multicultural society, and those who disagree with this view. In the case of the former group faith schools have been criticised for being socially divisive, since pupils have no contact with pupils with different cultural backgrounds. For example Susan Moller Okin and Rob Reich (1999) argue that faith schools cannot provide an environment where pupils can "come to into dialogue with and negotiate issues of moral and cultural difference" (Okin & Reich 1999, 293). Similarly, Kymlicka (1999b, 88-90) argues that the deliberate separation of children by religion contravenes the principle of education for good citizenship: a proper education needs to include not only learning about different cultures but also interaction among pupils from different cultural backgrounds. Jackson (2004a, 52) shares this view in principle, arguing that "[t]here is a strong case for finding ways for children from different backgrounds to interact with each other at school."

In an article entitled 'Social Cohesion, Autonomy and the Liberal Defense of Faith Schools', Neil Burtonwood (2003, 419) refers to empirical evidence that demonstrates the positive value of dialogue across religious traditions. However, he also notes that the point is not being in contact as such: "it is the curriculum of the school that matters rather than opportunities for direct experience of peers from other cultural groups" (Burtonwood 2003,

418). Similarly, Geoffrey Short and Ruth-Ann Lenga (2002) argue that faith schools need not be socially divisive and undermine social cohesion.² In their article, ‘Jewish Primary Schools in a Multicultural Society: responding to diversity’ (2002), Short and Lenga divide faith schools into two types: moderate schools, which also teach other cultures, and more orthodox schools, which are “less than enthusiastic about engaging in multicultural education” (Short and Lenga 2002, 49). They see no disparity between the aims of moderate faith schools and the ability to equip pupils with the skills needed to function in a multicultural society (Short and Lenga 2002).

Following the analysis of political ways of thinking in the four countries with regard to the content of education in a multicultural society, I look at changes being made in the curriculum for the sake of better cohesion.

Great Britain³

History of educational arrangements

The historical roots of the formal structure of the educational system of England (and Wales) go back to the second half of the nineteenth century (Lankshear 2007, 218). Before the first Education Act in 1870, the state was not in any way involved with either the provision of schooling or its regulation. The provision of education was limited to local action. All schools were private or charitable schools; the education of children was considered solely a private affair of the parents. If parents had enough money, they could hire a private tutor or send their children to a variety of grammar or other fee-charging schools. As for the poor, the only place to get their children educated were dame or charity schools. (Walford 2001, 360-361.)

It was through legislation (the Education Act of 1870) that the state became involved in the provision, maintenance and organisation of elementary schools of its own. A new kind of school was established, administered by local boards and funded with public money. (Walford 2001, 361-362.) At the same time, school attendance became compulsory for all children (Lankshear 2007, 218).

The 1870 Education Act set up what became known as the ‘dual system’ of education. Two kinds of school, namely church and board schools, were part of a single overall system subject to government inspection. Schools run by the Church received a similar sum of money as board schools. (Kay 2000, 13-14.) According to Lankshear (2007, 218), the Education Act of 1944 “confirmed the partnership between the state and the churches in the provision of schooling and set the framework within which the school system

² See also Short (2002; 2003).

³ In this chapter I concentrate on the educational arrangements prevalent in England.

in England and Wales has operated ever since.”

Faith schools

In 2007 around 38 % of all primary schools and 15 % of all secondary schools had a religious character (Lankshear 2007, 218).⁴ Until 1998 there were no state-funded schools for children of the various new immigrant minority religions. Only established Christian and Jewish schools were eligible for public funding. At the beginning of New Labour governance Muslim groups increased their pressure on the authorities for public recognition, in the mode of state-funded schools. As a result, in 1998 two Muslim schools were granted state funding. (See e.g. Walford 2003, 282-283.)

Outside this ‘dual system’ are independent schools. At the beginning of 2010, around 7 % of all schools were privately run independent schools (Independent Schools Council 2011). These schools do not have to follow the National Curriculum, while all state-funded schools, whether or not religious in character, have this obligation. Independent schools, for example, do not have to describe evolution as a ‘scientific fact’, and they have the freedom to include books that treat it as a theory that is in opposition to creationism. (Walford 2003, 286.)

Geoffrey Walford has investigated independent faith schools in England. During the 1980s, the increased secularism of most state-maintained schools, including schools owned by the churches, caused various groups of evangelical Christians to establish their own schools in order to ensure that their Christian beliefs were fully reflected in the school’s teaching and ethos (Walford 2003, 283). As a result, small private schools were established. According to Walford, this trend also included many immigrants:

[P]erception of growing secularism also led to concern amongst various other religious minorities parents, in particular Muslim parents who believed that their children were likely to be influenced away from their Islamic belief and practices. ... As a result, in the late 1980s, various groups of parents and mosques, established small private Muslim schools for their children. (Walford 2003, 283.)

In sum, “[i]n England both Muslims and evangelical Christians started their own private schools because they were deeply dissatisfied with the state sector” (Walford 2003, 287). This trend continued in the first five years of the new millennium, and the number of independent faith schools increased rapidly. Within two years (between 2003 and 2005) the number of faith schools doubled, from 170 to nearly 300; this figure included over fifty

⁴ The majority of these schools are either Church of England or Roman Catholic in character (Lankshear 2007, 218).

Jewish schools, around a hundred Muslim schools and over a hundred Evangelical Christian Schools (see e.g. Bell 2005).

Government policy, political atmosphere and recent developments

Now let us return to the question of what effects the government policy of promoting social cohesion has had in the field of education. Perhaps surprisingly, the Labour Government's actions in the field of education seem to have increased parents' opportunities to choose a school type that is in accordance with their philosophy of life. Indeed, at the beginning of the millennium parental choice became one of the key pillars of education policy. In 2001 the government published a White Paper entitled *Schools Achieving Success*, in which one leading idea was to expand the number of City Academies; this would also open up the possibility of creating new faith schools funded by the state (see Department for Education and Skills [DfES] 2001, 47). According to the White Paper, "[a]s the system becomes more diverse, we want it to become more capable of responding to individual needs and to different *groups* in society" (DfES 2001, 39 par 5.7; italics added). It is worth noting that in the run-up to the 2001 general election, Tony Blair told a conference of religious organisations⁵ that church schools form an important part of the education system, "valued by very many parents for their faith character, their moral emphasis and the high quality of education they generally provide" (*The Guardian* 2001).

The Labour Government's policy of expanding the number of Academies, however, was heavily criticised in public, chiefly on the grounds of precisely the possible rise in the number of faith schools. The Chairman of the Education and Skills Committee, Barry Sheerman, argued that

[i]f we are going to not have divided, ghettoised communities we have to be very careful of this enthusiasm that some in the Department for Education have for faith schools, and we have got to be very careful about the growth of very religious minorities getting a hold on academies (*The Guardian* 2005a).

According to Sheerman, religious schools pose a threat to the cohesion of multicultural community. "Do we want a ghettoised education system?", he asked:

[s]chools play a crucial role in integrating different communities and the growth of faith schools poses a real threat to this. These things need to be thought through very carefully before they are

⁵ The conference was organised by the Christian Socialist Movement.

implemented.⁶ (*The Guardian* 2005b.)

The majority of the public was also against the idea of increasing the number of faith schools. According to an opinion poll by *The Guardian*, the government's education reform, designed to increase parental choice, was opposed by almost two thirds of the public (*The Guardian* 2005b).

The Chief Inspector of Schools (Ofsted),⁷ David Bell, expressed a similar view. In a speech to the Hansard Society⁸ in January 2005, he warned that Muslim and other faith schools outside the state system were teaching a narrow curriculum that failed to prepare children for a life in a multicultural democracy. Referring to the fast-growing independent faith school sector, he said:

I believe that it is right that parents should be able to choose how their children are educated and should be able to pay to do so. That is the mark of a free and open society. Yet, on the other hand, faith should not be blind. I worry that many young people are being educated in faith-based schools, with little appreciation of their wider responsibilities and obligations to British society. ... The growth in faith schools needs to be carefully but sensitively monitored by government to ensure that pupils at all schools receive an understanding of not only their own faith but of other faiths and the wider tenets of British society. We must not allow our recognition of diversity to become apathy in the face of any challenge to our coherence as a nation. I would go further and say that an awareness of our common heritage as British citizens, equal under the law, should enable us to assert with confidence that we are intolerant of intolerance, illiberalism and attitudes and values that demean the place of certain sections of our community, be they women or people living in non-traditional relationships. (*The Guardian* 2005c.)

This speech expressed the same central themes presented in the previous two chapters, in the conclusion to the analysis of the empirical material:

- (i) It is the religious way of life that has to fit in with the needs of a

⁶ Sheerman's point is essentially the same as that provided by Okin & Reich (1999), Kymlicka (1999b) and Jackson (2004a): In a culturally plural society pupils should not be separated according to cultural background. However, Sheerman's argument seems to be about reducing segregation or increasing integration between communities, while these scholars are concerned with promoting the pupils' ability to live in a multicultural society.

⁷ Ofsted is the Office for Standards in Education, Children's Services and Skills. It regulates and inspects facilities to achieve excellence in the care of children and young people, and in education and skills for learners of all ages. See <http://www.ofsted.gov.uk/Ofsted-home/About-us>

⁸ The Hansard Society is the UK's leading independent, non-partisan political research and education charity. See <http://www.hansardsociety.org.uk/>

- society – not the other way around.
- (ii) Citizens have responsibilities towards the nation. One of these responsibilities is to acquire knowledge as to the nature of a multicultural society and of different life stances.
 - (iii) The core of national identity, as constituted by the society's values, is non-negotiable.
 - (iv) Certain illiberal practices that are in conflict with society's core values are not tolerated.

In short, even though some religious parents want to lead a particular religious way of life, their children need to be fully equipped for living in a multicultural society. This is made explicit when Bell talks about the education of Muslim children: a “traditional Islamic education does not equip Muslim children for living in modern Britain” (*The Guardian* 2005c). He refers to the annual Ofsted report:

[m]any schools must adapt their curriculum to ensure that it provides pupils with a broad general knowledge of public institutions and services in England and helps them to acquire an appreciation of and respect for other cultures in a way that promotes tolerance and harmony. (Bell 2005; citing the Ofsted report from 2005).

The government's new educational policy, however, did not mean that the government was ignorant of what happens within the walls of faith schools. For instance in 2005 the Minister of State for School Standards, Stephen Twigg, urged faith schools to “promote understanding” between different religions: “[a]ll schools need to work together to meet the needs of every pupil. Faith schools can and should be part of this collaboration.” (*The Guardian* 2005d.)

The question of control over independent faith schools also became a matter of public dispute. It was found that independent schools were not monitored properly. Although independent schools are not obliged to follow the National Curriculum, they still fall under the Ofsted inspection regime. As a consequence, better control was demanded. David Willets, the Shadow Education Secretary, stated that “[i]t is not acceptable that a significant number in a particular category, namely independent Muslim schools, appear to be escaping the rigour of the inspection regime” (*Telegraph* 2007).

Before going on to the results of these inspections, it is worth mentioning that the actions of some Muslim schools have proved to be in conflict with Britain's overall educational ideology. In 2007 the government closed an Islamic school in East Sussex, which had been raided by the police as part of an anti-terror operation, because it did not meet registration standards. Similarly, King Fahad Academy, a West London school funded by the Saudi government, was condemned for using textbooks that described Jews as “pigs”. (*Telegraph* 2007.)

Except for these cases, however, the fear that faith schools do not contribute adequately to the promotion of cohesion seems to be exaggerated. The latest Ofsted report, *Independent Faith Schools* (2009), is based on the inspection of 51 independent faith schools drawn from the Christian, Jewish, Muslim, Buddhist and Hindu religions. In the following I present its major findings thematically.

First, with regard to education for responsible and good citizenship, the report found that

[g]ood citizenship was considered by all the schools visited to be the duty of a good believer because this honoured the faith. All the schools visited demonstrated the importance of respecting people of a different faith. (Ofsted 2009, 4.)

The key role for the schools was to enable young people to be ‘good citizens’, committed to participating positively in society, even though they themselves may be subject to anti-Semitism and Islamophobia, for example. The schools worked hard to develop the personal confidence of young people to deal with negative influences without compromising their beliefs. (Ofsted 2009, 9.)

When it came to imparting knowledge about other ways of life, on the other hand, the schools were less successful:

Although most schools taught a general understanding of other faiths, particularly to older pupils, many of the schools visited were reluctant to teach about other faiths in great detail (Ofsted 2009, 9).

Twelve of the schools visited raised concerns about any requirement to teach details of other faiths. In particular, leaders were concerned that it would be inappropriate to introduce younger children to the details of other faiths because they felt children were too young to distinguish between similarities and differences. A school leader summed up by saying: ‘We don’t want to know the details of what they believe but do need to know that they believe in something greater than themselves’. (Ofsted 2009, 10.)

One finding was that schools serve the function of maintaining group identity and even increase its importance in the pupils’ lives: “In all the schools visited, pupils gained a strong sense of personal worth and of belonging to their faith community” (Ofsted 2009, 8). At the same time, a need to protect pupils from alien influences was stressed:

Christian, Jewish and Muslim schools, to different degrees, were striving to protect their young people from the perceived negative influences of the wider secular society. All accepted and taught about diversity and saw the promotion of community cohesion as requiring respect and acceptance of other faiths while remaining distinct in

their own faith, rather than being a homogeneous cultural mix. (Ofsted 2009, 9.)

With regard to an important ingredient of cohesion, namely national identity, the finding was that schools were not sure about the values that form this:

There was extensive debate about what was meant by the term ‘modern Britain’, used in the letter sent by the Secretary of State when commissioning the survey. Schools were concerned that this term contained no specific values. A general consensus existed that, instead of the term ‘modern Britain’, the alternative should be ‘preparing young people to be good citizens of the United Kingdom’. (Ofsted 2009, 9.)

While the Ofsted report showed that the content of teaching in the faith schools inspected was in accordance with the nation’s overall educational policy, further investigations were immediately demanded. After publication of the report, School Secretary Ed Balls instructed Ofsted to carry out a survey of the ‘moral values’ of independent faith schools. The rhetoric used to justify the need for this further survey is familiar. According to Balls, “[s]ome concerns have been raised recently about practice in a small minority of independent faith schools and whether they are effectively preparing pupils for life in wider British society.” (*The Guardian* 2009.)

As we have seen, the ability of faith schools to prepare pupils for life in a multicultural society has been questioned by politicians, by experts in educational matters, and the public. However, it is not only in this area that pressure is put on faith schools. There is evidence that schools overall are expected to fit into the framework of society’s basic convictions.⁹ Religious faith is no reason for exemptions in fundamental matters, such as equality among citizens. In 2007 the Equality Act was passed, prohibiting discrimination on grounds of sexual orientation in the provision of goods, facilities and services. The Joint Committee on Human Rights issued a report, ‘Legislative Scrutiny: Sexual Orientation Regulations’ (2007), to explicate how the Equality Act was to be applied in the exercise of public functions. With regard to education, the report stated the following:

We do not consider that the right to freedom of conscience and religion requires the school curriculum to be exempted from the scope of the sexual orientation regulations. In our view the Regulations prohibiting sexual orientation discrimination should clearly apply to the curriculum, so that homosexual pupils are not subjected to teaching, as part of the religious education or other

⁹ In the ‘Concluding remarks’ section of Chapter 2, I argued that each of the four nations, as well as the Council of Europe and the EU, have their own convictions, i.e. their vision of *the good*.

curriculum, that their sexual orientation is sinful or morally wrong. (House of Commons 2007, 21 par 67.)

This means that it is not for example allowed to teach that homosexuality is objectively wrong. The school can tell pupils that according to some religions homosexual behaviour is regarded as sinful, but not that homosexuality is objectively wrong:¹⁰

Applying the Regulations to the curriculum would not prevent pupils from being taught as part of their religious education the fact that certain religions view homosexuality as sinful. In our view there is an important difference between this factual information being imparted in a descriptive way as part of a wide-ranging syllabus about different religions, and a curriculum which teaches a particular religion's doctrinal beliefs as if they were objectively true. The latter is likely to lead to unjustifiable discrimination against homosexual pupils. We recommend that the Regulations for Great Britain make clear that the prohibition on discrimination applies to the curriculum. (House of Commons 2007, 21-22 par 67.)

The Equality Act (Sexual Orientation) Regulations came into force 30 April 2007. These regulations are binding upon all schools, including independent ones.

The Netherlands

History of educational arrangements

In the Netherlands, the state became involved with the provision of education as early as the beginning of the nineteenth century; the first Education Act was passed in 1801 (Walford 2001, 364). One distinctive feature of the Dutch educational system is that it has a very wide private sector that enjoys full public funding. The constitution calls for public and private schools to be treated equally,¹¹ and since 1917 each religious community has had the right to establish its own schools with full state funding (Thijs et al. 2008, 11; Walford 2001, 364). This arrangement has its historical roots in pillarization, whereby the society was vertically segregated on the basis of religion, each pillar with its own political parties, schools, etc. funded by the state. Currently around two thirds of all primary- and secondary-school students are educated in private schools (Kuyk 2007, 135).

Within this framework, the Ministry of Education, Culture and Science has prescribed minimum requirements for education; their implementation is

¹⁰ Later in this thesis I return to the issue of how the 'knowledge' that religions provide should be treated in schools.

¹¹ Freedom of education is guaranteed under Article 23 of the Dutch constitution.

monitored by the Dutch Inspectorate of Education (Inspectie van het Onderwijs).¹² However, considerable freedom has been left to the schools to arrange education according to their own ethos. (Thijs et al. 2008, 11; Karsten 2006, 32; Shahid & Koningsveld 2006, 76; Driessen & Merry 2006, 202-203.) If the requirements dictated by the state for example in history or biology are in conflict with the school's religious beliefs – as in the case of evolutionary theory or certain historical events – the school has the possibility of formulating alternative targets. It is worth noting that the Inspectorate has not spelled out any guidelines as to how religion is to be taught. The schools have had full freedom in this matter. (Karsten 2006, 27.)

Faith schools

Geert Driessen and Michael S. Merry (2006, 203) write that although the influence of religion in most social institutions and organisations has declined, the “denominational educational system has remained remarkably intact”. In general, however, religiously oriented private schools are far more secular than they once were (Walford 2001, 368). For instance the Catholic or Protestant churches no longer have a significant impact on the curriculum of their schools. This development reflects the overall secularisation of the society as a whole, and has also affected the content of religious education. Walford (2001, 368) writes that the teaching of religious education has in most religious schools been reduced to simple factual information about different worldviews. According to Elza Kuyk (2007, 136), in most schools the approach to religious education has become more multicultural and inter-religious. Walford (2001, 368) also notes that “the religious affiliation of Dutch schools is no longer a major factor in choice” (Walford 2001, 368).

Immigration has changed the composition of existing schools. Since it is quite easy to establish a new private school with full funding (Walford 2001, 364), there has been a significant growth in the number of Muslim and Hindu schools (Walford 2001, 369). In 2007 there were 48 Islamic primary schools, containing 5 % of all Muslim children, and two Islamic secondary schools. (Kuyk 2007, 136.)

Political atmosphere

The increase in the number of Islamic schools has given rise to public debate in the Netherlands as well. In their article, ‘Islamic Religious Education in the Netherlands’ (2006), Wasif A. Shahid and Pieter S. van Koningsveld distinguish three periods of public debate over Muslim schools. The first of these, from 1988 to 1997, focused on the desirability of Islamic schools, their advantages and disadvantages. Those who favoured Muslim schools argued

¹² See, <http://www.onderwijsinspectie.nl/site/english>

that these schools could promote Muslim integration, at the same time allowing students to preserve their distinctive group identity. It was also argued that parents would be more involved in their children's education. Opponents, on the other hand, considered that private Islamic schools upheld barriers between groups, since the children's social contacts are limited. (Shahid & van Koningsveld 2006, 83-84.)

The second period of the public debate can be located between 1998 and 2000. The main theme of public concern at this time was the quality of education in Muslim schools. A study by the Inspectorate of Education indicated that the pedagogical climate and teaching expertise in Muslim schools were worse than in the average primary school. (Shahid & van Koningsveld 2006, 84-85.)

The third period began in 2001, following the events of 11 September. Concerns were raised in the public debate over the influence of political Islam and the successful integration of immigrants. (Shahid & van Koningsveld 2006, 85). The fear was that the reason Islamic schools were attracting increasing numbers of parents was "precisely because [the schools] adhere to traditional norms and values, even when these are in direct conflict with the values of modern society" (Karsten 2006, 32). According to Sjoerd Karsten (2006, 29), while the Netherlands has always publicly respected the norms and values of different minorities, the question was raised "whether the state should fund only the 'common' secular state school which provides a neutral curriculum and is equally accessible to all".¹³

As scepticism towards Muslims increased, the Inspectorate of Education (Onderwijsinspectie) was given the task of investigating the "anti-integrative tendencies" of Muslim schools, to find out whether these promote hatred toward Western society. The Inspectorate investigated thirty-seven Muslim primary schools and published a report under the title *Islamic Schools and Social Cohesion (Islamitische scholen en sociale cohesie)* (2002). Its major conclusion was that almost all Muslim schools played a positive role in creating conditions favourable for furthering social cohesion. (Shahid & van Koningsveld 2006, 85-86; Driessen & Merry 2006, 212.)

The Dutch Secret Service (BVD) carried out its own investigations into the content of education in Muslim schools. In its report, *The Democratic Legal Order and Islamic Education: Foreign interference and anti-integrative tendencies (De democratische rechtsorde en islamitisch onderwijs: Buitenlandse inmenging en anti-integratieve tendensen)* (2002) it focused on foreign interference in Islamic schools and their possible anti-integrative tendencies. One finding of the report was that the boards of Muslim schools were overly authoritative. The BVD also criticised the Inspectorate of Education for not supervising classes in religious education. It

¹³ Kuyk (2007, 140) notes that this question is also raised occasionally by those who want to exclude all religion from all types of schools.

argued that the influence of foreign organisations was in general rather limited, but that religious education classes formed an exception. In many cases the same teachers, opposed to the idea of integration of Muslims into Dutch society, taught both RE and MLC (minority language and culture). (Driessen & Merry 2006, 212.)

As a result, the Lower House demanded a further investigation. The Inspectorate of Education published a new study, *Islamic Schools Revisited (Islamitische scholen nader onderzocht)* (2003), in which twenty Muslim schools were analysed in depth. The final conclusion was that education in Muslim schools “was not contradictory to the basic values of democratic state” and “to a lesser or greater extent furthered conditions favourable to the integration of the students”. However, when it came to religious instruction, the conclusion was that “the pedagogical-didactic quality left much to be desired in many schools”. (The Dutch Inspectorate of Education 2003; cited in Shahid & van Koningsveld 2006, 86.) As mentioned above, no legal conditions have been prescribed with regard to the teaching and content of religious instruction.

Recent development

The Netherlands Education Council¹⁴ (Onderwijsraad) declared in 2002 that the schools should promote social cohesion (Leeman & Pels 2006, 64). In 2004 the Minister of Education presented a memorandum to the Lower House, under the title *Education, Citizenship, and Integration (Onderwijs, Integratie en Burgerschap)*. Shahid and van Koningsveld (2006, 86) summarise the main points of the memorandum as follows:

The first point discussed the issue of preventing the founding of new Muslim and Hindu schools, on the grounds of their purported contribution to segregation. ... A second issue was the functioning of Muslim school boards. The government contemplated making Dutch nationality a condition for membership to such a board and stipulating that new requests for the founding of Muslim schools be accompanied by a school plan indicating what the school could contribute to the forming of citizenship. *Finally, the government announced that the development of an adequate method of religious education (one that guarantees the teaching of a non-conservative Islam) was in preparation.* (Italics added.)

Driessen and Merry (2006, 215) write that Liberal Party (in the government in 2003)

¹⁴ The Council is an independent governmental advisory body that advises the Minister, Parliament and local authorities in education, policy and legislation.

wants to put a halt to the expansion of these [Islamic] schools. ... [P]robably the most important reason why the Liberals are against Islamic schools is because they fear that the Muslim children be indoctrinated with anti-Western, anti-democratic, and anti-integrative ideas. To prevent this, the Liberals are calling for ethnically mixed schools; in their opinion, such schools offer the best opportunities for integration.

The Christian-Democratic Minister of Education also proposed that the members of a school board needed to have Dutch nationality; in addition, they had to adopt an integration plan, and explain how they proposed to adhere to Dutch norms and values (Driessen & Merry 2006, 215).

A new legislative proposal was also issued, according to which new schools had to accommodate diversity: no more than 80 % of pupils could come from a disadvantaged background (Karsten 2006, 31). This proposal weakened the possibility of establishing new Islamic schools. Driessen & Merry (2006, 201) cite studies showing that at the time (2006) there was a need for 120 new Muslim schools.

As in the case of Britain, investigations have found that some Islamic schools are not doing enough to encourage students towards social integration and have failed to respect and instill the basic values of democracy. In 2009 the Deputy Education Minister, Sharon Dijksma, said that the government was going to withdraw part of the government funding from an Islamic school, As Siddieq, unless the school changed its attitude. This announcement was due to a critical report by the Educational Inspectorate. (Radio Netherlands Worldwide 2009.)

Sweden

History of educational arrangements

Compulsory elementary schooling was introduced in Sweden in 1842. Since then the state has borne the responsibility for the provision of education. At the beginning, the connection between the education system and the church was strong. (Almen 2000, 62.)

When universal suffrage was enacted in the Constitution in 1918, some parents wanted to establish private schools corresponding to their religious beliefs (Almen 2000, 62). Since national unity within the educational system – the idea of a single school type common to all – was highly valued by the government, this right was not granted; the character of religious education, however, was changed from a confessional Christian, Lutheran education to a non-denominational Christian form, allowing the schools to better serve their function as common to all. (Larsson 2007, 194; Almen 2000, 62-62.)

In 1953 Sweden signed the Protocol to the Convention of Human Rights. This meant that legal proceedings could be taken against Sweden at

the European Court of Human Rights if the fundamental freedoms set down by the Council of Europe were violated. The Swedish government stuck to the idea of a unified educational system, once again denying the possibility of public support for separate schools for special religious groups. (Almen 2000, 63.)

In the early 1960s an educational reform introduced significant changes in the subject of RE. It was defined as an objective and neutral, non-confessional subject. Its name was changed to ‘Knowledge of Christianity’; by the end of the decade (in 1969) this in turn became ‘Knowledge of Religion’. (Larsson 2007, 194.)

Faith schools

In 1991 the government changed course with regard to the funding of independent schools. It issued a White Paper, *Freedom of Choice and Independent Schools (Valfrihet och fristående skolor)*, according to which parents would have a wide range of choice between public schools and independent ones (Riksdagen 1991b). The Independent School Reform which took place in 1992 made it possible for families to send their children to any school — public or private — without having to pay fees. Today the state finances all public and private schools that are accepted by the Swedish National Agency for Education (Sweden.se 2011).

This opportunity has radically increased the number of independent schools. While in the school-year of 1990-1991 some 0.9 % of all Swedish pupils in compulsory education were enrolled in independent schools (Swedish Association of Independent Schools 2010), in 2008 9 % of primary-school students and 20 % of high-school students attended private schools (Riksdagen 2010, 233). Of the independent primary schools, 13 % have a religious profile (Larsson 2007, 197).

Immigrants too have founded private schools; in 2009 there were seven Islamic schools in Sweden.

With regard to the regulations that control schooling, independent schools are in a similar position compared to state schools. They have the same legal requirements regarding the general curriculum, course syllabi and fundamental educational values. This means that for example religious education has to be a knowledge-based subject. (Ministry of Education and Science in Sweden 1985; Larsson 2007, 197.)

Recent development

Although the possibility for parents to choose among different school types has expanded radically, faith schools have faced a similar rise of public suspicion and state control as in Britain and the Netherlands. Larsson (2007, 197) notes that “[s]ome confessional schools have been criticised recently for

a perceived deficiency in openness and the practice of democratic values, which have justified a discussion about special restrictions for confessional schools.” In 2007 the Minister of Education, Jan Björklund, declared that control over faith schools would be doubled, and that this might result in closing the school or denying funding. The Minister for Integration and Gender Equality, Nyamko Sabuni, demanded the full closure of religious schools, while the Secretary of the Social Democratic Party, Marita Ulvskog, called these schools ‘child prisons’. (*Dagens Nyheter* 2007a.)

This trend can be seen as an attempt to domesticate faith schools to fit into the framework of liberal democracy. In 2007 the Minister of Education issued a statement that all religious content will be removed from education except for RE classes. “Students should be protected from all kinds of fundamentalism”, he said. This would mean, according to the Minister, that schools are not allowed to teach creationism anymore. The Minister indicated that future legislation (Education Act, 2010) will make this very clear.

Now it will be crystal clear: it won’t be allowed. Some statements from independent schools have led to a very worrying picture ... It will still be allowed to hold Morning Prayer, but as soon as teaching starts, the curriculum, and only the curriculum, will apply. (*Dagens Nyheter* 2007a.)

In 2010 the government presented a proposal for a new Education Act.¹⁵ In this proposal, one goal was put all school types under similar or same legislation:

A fundamental principle in the proposition for a new school law is that all types of activities and all types of schools should, as far as possible, be based on the same legislation, whether the authority is the municipality, the county, the state or an individual (Riksdagen 2010, 207).

The idea of the non-confessional character of all education is formulated as follows: “The government proposes that education conducted by a public authority should always be non-denominational” (Riksdagen 2010, 224). With regard to the teaching of religion in any type of school, the proposal states the following:

It will also ... within the limits of the pupil’s choice or the school’s choice in primary school and corresponding types of schools, or within the individual’s choice in secondary school be possible to offer education in religion, history or civics, meaning the deeper

¹⁵ The new Education Act came into force July 1 2011, see Lagen.nu (2012): Skollag (The Education Act) (2010:800)

study of Christianity, Islam, Judaism etc. for instance by studying the Bible or the Qur'an. This education must nevertheless be non-denominational, i.e. *it must be based on scientific grounds* and be factual and comprehensive. (Riksdagen 2010, 227; italics added.)

Reference is made to the European Convention, according to which no person shall be denied the right to education and that the State will respect the right of parents to ensure such education and teaching in conformity with their own religious or philosophical convictions (Riksdagen 2010, 226).¹⁶ The point seems to be, however, that despite respecting the pupil's choice – or, more precisely, that of their parents or other legal guardians, the government wants to control what kind of 'knowledge' is provided in religious education classes. In the previous chapter I argued that Great Britain, the Netherlands, Sweden and Denmark are attempting to create a 'liberal state of mind' in their citizens; in other words, to cultivate the virtue of 'reasonableness' in the Rawlsian sense. I have hypothesised that this is expected to increase the possibilities of co-operation among citizens who hold differing or even conflicting visions as to how to lead a good life or what is worthwhile. In addition, as I shall show later in this thesis, these four nations, as well as the Council of Europe, are also encouraging pupils, as future citizens, to approach religion-related issues with a scientific attitude. The point is that in a culturally plural society pupils are being exposed to different sources of 'knowledge', while in the schools only one source seems to qualify as legitimate. As in the case of Great Britain in connection with teaching about homosexuality, likewise in Sweden information imparted in the schools is to be impartial and "based on scientific grounds". One underlying assumption seems to be that if the schools succeed in this, it will increase the chances of better cohesion. This is because citizens will have impartial or neutral knowledge, which in turn will improve the possibility of a fair, democratic decision-making process.¹⁷

In the previous chapter I wrote that the Swedish conservative-liberal government is also anxious to protect children's rights with regard for example to health education or swimming lessons. The new legislation allows no exemptions in the name of religious practices or norms. In a proposal for the new Education Act, under the heading 'Special attention to the best of the child' ('Särskild hänsyn til barnets bästa'), states the following:

¹⁶ In Chapter 6 I discuss the rights of the state with regard to the content of religious education under the European Convention.

¹⁷ In Chapter 1 I discussed one dimension of the distinction between the public and the private sphere, according to which political actions or decisions cannot be legitimated by principles or views derived from a particular religion but have to be based on principles or views that all are expected to accept.

To be able to assess what is in the child's best interest, it is required to impose a child's perspective before making any decisions or actions concerning children. The best interest of the child, as the basis for all education, means that education will strive to give the child the best possible conditions for his or her personal development. (Riksdagen 2009, 230.)

Denmark

History of educational arrangements and faith schools

The evolution of the Danish educational system is quite similar to the Swedish one. The *Folkeskole* (the publicly funded school system) was formally established in 1814, and by the beginning of the twentieth century a modern system of general education had taken shape in cities and towns.

Until 1975 the *Folkeskole* shared responsibility for Christian nurture (*dåbsoplæring*) with the Church of Denmark. After that the responsibility was split: the schools have the responsibility for passing on knowledge and enabling cultural individualisation (*Dannelse*),¹⁸ while the church and the parents are responsible for Christian nurture. This means that the school subject, 'Kristendomskundskab', is non-confessional. The approach is scientific, with the aim of transmitting knowledge of Christianity and other religions. Lessons do not involve instruction in religious practice. (Monrad 2007, 49-51.)

Along with this state-maintained system there are also private schools,¹⁹ which receive governmental funding regardless of the ideological, religious, political or ethnic motivation behind their establishment. Funding is allocated 'per pupil per year', and it matches public expenditures on state schools. In 2007, around 13 % of all children at the elementary school level were attending independent schools. (Danish Ministry of Education 2008a, 1-2.)

All these schools have to follow the general rules for the *Folkeskole*, for example in teaching religion. The religious dimension, however, may play a larger role in the daily life of the school. (Danish Ministry of Education 2008a, 1-2; Monrad 2007, 53.)

Recent developments

In recent years, religiously oriented private schools have faced the same suspicion from the government as independent faith schools in Great Britain, the Netherlands and Sweden. Here too the fear is that some of the activities

¹⁸ According to Monrad (2007, 55: footnote) "[t]he Danish word *dannelse* is approximately equivalent to the German word *Bildung* of which there is no direct equivalent in English."

¹⁹ Danish Ministry of Education uses the term 'private schools'.

of the faith schools will lead to greater segregation, rather than contributing to the reproduction of functional democracy and the transmission of the society's fundamental values. In the summer of 2009 the Trade and Economy Minister, Lene Espersen, stated at the Conservative Party convention that the idea of a Muslim 'parallel society' should be resisted. She also referred to current educational arrangements that may serve as an obstacle to integration:

We have children who grow up in this country, who in principle could just as well be living in Saudi Arabia. This is because the TV they see at home, the language they speak at home, and *what goes on at various private schools*, has nothing to do with Denmark. (*Politiken* 2009; italics added.)

The remedy, according to the Minister, is that more democracy and Danish values should be taught in schools. She also demanded stricter legislative regulation for private schools. For example, teachers should have the same professional qualifications as teachers in public schools. (*Politiken* 2009.)

These suspicions as to the private schools' ability – or willingness – to produce citizens equipped with democratic skills has led to closer scrutiny of these schools. In 2009 the Minister of Education, Bertel Haarder, said that twenty-five Muslim and Catholic schools would be inspected in the near future to see whether they prepare their students to live in freedom and democracy. These inspections were part of the government's decision to fight extremism. The minister also stated that inspections would continue in the future. (*Kristeligt Dagblad* 2009a.)

The Social Democratic Party was also open to stricter supervision of private schools. Christine Antorini, the education spokesperson, said that they supported the proposal. The Party was in favour of the idea that all religious private schools should be investigated; they also saw it as problematic that some Christian private schools taught creationism. (*Politiken* 2009.)

According to the chief consultant of the Board of Education (Skolestyrelsen), Anders Andersen, the Board had formulated four objective criteria for the inspections. Private schools which met at least two of the criteria were likely to get an inspection visit. These criteria were as follows:

1. The school was based on religious or political views.
2. The school did not explicitly state how it fulfilled the legal requirement to prepare students for a society of freedom and democracy like Denmark.
3. There was a concern that pupils were isolated (or isolated themselves) from others based on their religion, skin colour or political convictions.
4. Former inspections had indicated that the schools did not meet the requirement of preparing students for freedom and democracy. (*Kristeligt Dagblad* 2009b.)

The Council of Europe and the need to promote intercultural education

As I have shown in this chapter, the presence of different religions – more precisely, of religious beliefs – has in recent years forced governments to take measures to inhibit or reduce social segregation. The Council of Europe has also been interested in advancing peaceful co-existence among citizens. James Wimberley²⁰ (2003, 200) notes that since the 1980s the Council of Europe has “frequently discussed policy matters arising from religion, and adopted several texts on both religion in a democratic society”. One of these textual contributions is Parliamentary Assembly Recommendation 1396 Religion and Democracy (1999). The Recommendation recognises that

[t]here is a religious aspect to many of the problems that contemporary society faces, such as intolerant fundamentalist movements and terrorist acts, racism and xenophobia, and ethnic conflicts (Council of Europe 1999, par 3).²¹

Actions by the Council of Europe are usually limited to advising or making recommendations to its member states. Since the events of 11 September 2001, however, its course has been more pragmatic and it has been eager to create programs that would “promote intercultural understanding in general, and also to address in this framework the specific issues that arise on religion”. The Secretary General, Walter Schwimmer, hoped that intercultural and interfaith dialogue would become one of the major themes of the Council’s activities. (Wimberley 2003, 201.)

In those Council programs that are designed to promote intercultural understanding, education plays an important role. Between 1970 and 2003 the Council of Europe has issued twelve official documents concerning the role of education in fostering intercultural dialogue (Council of Europe 2004), but the first explicit statement that intercultural and inter-religious dialogue is a vital ingredient of civic education occurs in Recommendation (2002)12, ‘On Education for Democratic Citizenship’ (Council of Europe 2004, 19).

The Appendix to the Recommendation, under the heading ‘Educational objectives and contents of education for democratic citizenship’, calls for particular attention to be paid “to the acquisition of the attitudes necessary for life in multicultural societies, which respect differences”; it further states that “it would be appropriate to implement educational approaches and teaching

²⁰ In 2003 Wimberley was Head of Educational Policies and European Dimension Division in the Directorate of School, Out-of-School and Higher Education, Directorate General IV, Council of Europe.

²¹ It is worth noting that exactly the same sentence is used in Recommendation 1720 Education and religion (2007a, par 2). I present and discuss the Recommendation in Chapter 6.

methods which aim at learning to live together in a democratic society” (Council of Europe 2002b).

Another document that deals with intercultural education is Resolution Res(2003)7, ‘On the youth policy of the Council of Europe’. The resolution reaffirms the concept of “pluralist democracy”, and “the promotion of intercultural dialogue and peace” is the first item in the list of “thematic priorities for the years ahead” (Council of Europe 2003, II a). The promotion of social cohesion is also mentioned as an important educational goal, along with human rights education and the promotion of human dignity (Council of Europe 2003, II b).

Two programmes have followed: The Challenge of Intercultural Education today: Religious diversity and dialogue in Europe (2002-2005), and Intercultural Dialogue and Conflict Prevention (2002-2004).

How does the curriculum reflect the need to achieve cohesion?

Great Britain

In 1997 Britain’s Secretary of State for Education, David Blunkett, set up an Advisory Group “[t]o provide advice on effective education for citizenship in schools” (QCA 1998, 4). Its report, *Education for Citizenship and the Teaching of Democracy in Schools*, was published in 1998.

The report argues that Britain is facing “worrying levels of apathy, ignorance and cynicism about public life” (QCA 1998, 8 par 1.5). What is needed is a nation of ‘active citizens’ who are able “to think for themselves”, who have “critical capacities to weigh evidence before speaking and acting”, and who are willing “to have an influence in public life” (QCA 1998, 7 par 1.5).

The report suggests an effective citizenship education, based on three major ‘strands’: (1) promoting social and moral responsibility, (2) community involvement and (3) political literacy. With regard to the first of these, the aim is for children to learn “self-confidence and socially and morally responsible behaviour both in and beyond the classroom”. The second strand, community involvement, has to do with pupils “learning about and becoming fully involved in the life and concerns of their communities”. The third strand, the idea of political literacy, means that pupils learn “about and how to make themselves effective in public life through knowledge, skills and values”. (QCA 1998, 13 par 2.12; 40-41.)

Central learning outcomes are divided into three areas: (1) values and dispositions, (2) skills and aptitudes, and (3) knowledge and understanding” (QCA 1998, 41). It is worth noting that not only knowledge but also skills, such as an empathetic understanding and respect for others and their perspectives, are emphasised as important goals (QCA 1998, 44).

The report also suggests that citizenship education should be “a vital and distinct statutory part of the curriculum” (QCA 1998 13, par 3.1; see also 7

par 1.1; 22 par 4.1):

It can no longer sensibly be left as uncoordinated local initiatives which vary greatly in number, content and method. This is an inadequate basis for animating the idea of a common citizenship with democratic values. (QCA 1998, 7 par 1.1.)

The government accepted this recommendation. Citizenship education became a statutory foundation subject in 2002, as part of the statutory cross-curricular theme Personal, Social and Health Education (PSHE).

In addition, since September 2007 the schools also have the duty to promote community cohesion.²²

The Netherlands

Using education as a tool to prepare students to live in a multicultural society is not a new thing in the Netherlands. Already in 1981 the Ministry of Education and Science published its agenda, under the title *Policy Plan for Cultural Minority Groups in Education (Beleidsplan culturele minderheden in het onderwijs)*:

education should prepare and enable members of minority groups for full participation and functioning in the socioeconomic, social, and democratic aspects of Dutch society, with the possibility of doing so from their own cultural background (Dutch Ministry of Education and Science 1981, 6; cited in Leeman & Pels 2006, 66).

Here we see two goals being set: the preparation of all students to function successfully in a society, and the maintaining and cherishing of distinct and different cultural identities. The publication also explicitly states that education should enable students to learn *from* each other's cultures. In this sense, it is not only about acquainting immigrant students with the majority culture; an effort should also be made to enrich the dominant culture.²³

Education, through intercultural and other forms of instruction, should promote the acculturation of both minority groups and other members of Dutch society. We define acculturation here as a bilateral or multilateral process of learning from, accepting and appreciating each other, and being open to each other's culture or elements of it. (Dutch Ministry of Education and Science 1981, 6;

²² The Education and Inspections Act 2006 inserted a new section 21(5) into the Education Act 2002, introducing a duty on the governing bodies of maintained schools to promote community cohesion.

²³ In Bleich's model, outlined in Chapter 3, this would be an example of 'active multiculturalism'.

cited in Leeman & Pels 2006, 66.)

As a consequence, in 1985 *intercultural education* made it legally compulsory (by the Primary Education Act) for all schools to prepare their students for life in a multicultural society (Leeman & Ledoux 2003, 387). Schools had the freedom to choose specific areas of emphasis in the content of these lessons, and to decide whether intercultural education would form an independent optional subject or be integrated into other subjects. The usual solution was for the subject to be integrated. (Leeman 2008, 52.) The core of intercultural education consisted of world religions, colonial history, multicultural society, and migration (Leeman & Pels 2006, 70), but all schools were also obligated to devote attention to socio-philosophical movements such as feminism, socialism and humanism; it was regarded as necessary to give students insight into a range of intellectual and spiritual movements in an objective way (Leeman 2008, 52).

In 1994 the Ministry of Education, Culture and Science, together with the Ministry of Health, Welfare and Sport, decided that intercultural education should be more effective; they set up the Intercultural Education Project Group (Projectgroep ICO), to stimulate intercultural education and to facilitate its implementation as a regular school activity in all schools. One outcome of the group's work was the Intercultural Learning in the Classroom Project. (Leeman & Ledoux 2003, 388-389.)

In 2002 the Education Council of the Netherlands (Onderwijsraad) stated in a document *Learning to live together: An Exploration (Samen Leren Leven. Verkenning)* that in the case of the integration of immigrants the economic dimension is not sufficient; education too has to contribute to social cohesion (Onderwijsraad 2002; Leeman & Pels 2006, 64). According to Leeman (2008, 51), between 2003 and 2004 doubts were raised in numerous policy documents issued by the Lower Chamber of Parliament as to the loyalty of parts of the minority population toward the central values of Dutch society.

In 2003 the Education Council of the Netherlands issued a recommendation on 'Education and Integration: learning from the past' (Onderwijs en integratie: leren van het verleden), according to which citizenship education was to be explicitly included among the general objectives of educational legislation (Council of Europe 2009). In 2004 the Ministry of Education published a White Paper *Education, Integration and Citizenship (Onderwijs, integratie en burgerschap)* (Leeman 2008, 51).

Statutory citizenship education in all primary and secondary schools was introduced in 2006. Both the Primary Education Act and the Secondary Education Act were amended, with an additional specification obligating schools to offer education that 'stimulates active citizenship and social integration'. The Acts also state that education should enable pupils to become acquainted with the various cultural backgrounds of their fellow

pupils. (Thijs et al. 2009a, 39; 44.). Both Acts state that education

- a) begins among other things with the assumption that pupils grow up in a multiform society
- b) aims among other things at the promotion of active citizenship and social integration
- c) is directed among others things towards increasing the pupils' knowledge of and acquaintance with their fellow pupils' various backgrounds and cultures (Thijs et al. 2008, 27).

According to an explanatory memorandum attached to the Acts, the educational goal of 'active citizenship' means "willingness and ability to belong to a community and to make an active contribution to it." 'Social integration' means the ability to participate in the society and its institutions, together with an awareness of Dutch culture. It is the school's responsibility to promote citizenship and to ensure that pupils not only acquire knowledge of different cultures and philosophies of life but also become acquainted with children of the same age from different backgrounds. (Thijs et al. 2008, 27; 2009a, 44.) Leeman (2008, 53) argues that loyalty to the Netherlands and its central values must also be instilled.

The Dutch curriculum institute provides work schemes and materials for citizenship education. The Education Inspectorate monitors the measures taken by schools to accommodate the new subject. (Thijs et al. 2008, 27.)

Sweden

In Sweden there have been no recent changes in the curriculum. There is an independent subject called Civics, forming part of social studies. The introduction to the syllabus for Civics describes it as follows:

The subject of civics should provide basic knowledge about different societies, impart democratic values and stimulate participation in democratic processes. ... The subject contributes to pupils' ability to understand their own and others' conditions and values, and thus also to be able to distance themselves from and actively counteract different forms of repression and racism. Education should be open to different ideas and encourage their expression, as well as promote respect for each person's intrinsic value, regardless of gender, class and ethnic background. The equal rights and opportunities of boys and girls, women and men should be actively and consciously clarified. (Swedish National Agency for Education 2008, 75.)

Under the heading 'Goals to aim for', it says that pupils should "understand and practice the fundamental values of democracy", and should "develop their knowledge and an understanding of a society with ethnic and cultural

diversity, and the importance of this for relations among people” (Swedish National Agency for Education 2008, 75-76).

Alongside with Civics, the subject ‘Knowledge of Religion’ (Religionskunskap) also includes a component for understanding diversity in society and acting with responsibility (Swedish National Agency for Education 2008, 71).²⁴

Denmark

In 2007 the Danish Government set up a committee, with the task of drawing up a democracy ‘canon’ or agenda that could be applied in education. The committee’s report, entitled *The Danish Democracy Canon*, was published in 2008.

In the Foreword, Prime Minister Anders Fogh Rasmussen writes as follows:

We must face the fact that support for democracy and respect for the fundamental freedoms are not self-evident. ... The Danish Government therefore wishes to strengthen knowledge of the principles of freedom and democracy on which Danish society is based.²⁵ (Danish Ministry of Education 2008b, 5.)

Suggestions have also been made for establishing a distinctive subject, aimed at upholding and creating democracy. In the summer of 2009, for instance, Trade and Economy Minister Lene Espersen stated that democracy classes should be part of the curriculum from grades 1 to 10, so that all students would know about the rule of the people, equality, freedom of speech and the right to decide about their own lives (*Politiken* 2009).

In 2007 the concept of citizenship was officially incorporated into teacher education in Denmark, as part of the subject ‘Christianity studies, life enlightenment, and citizenship’ (Haas 2008, 59).

Summary and discussion

In this chapter I have traced measures taken by governments in the field of education in the name of increasing social cohesion. At the beginning of the chapter I pointed out that governments, along with the general public, have become suspicious about what is going on within faith schools. Faith schools’ autonomy to provide education in line with their religious beliefs has been limited. Religious schools are not only monitored carefully, but have also been publicly accused as a potential source of intolerance and anti-

²⁴ I return to this issue in the next chapter.

²⁵ In the next chapter I present and discuss the content of *The Danish Democracy Canon*.

democratic action. These are concrete examples of how the public is defended from the impact of the religious sphere by secular officials. Religion, more precisely ideas that are regarded as products of the religious domain, are presented as partly responsible for creating and/or maintaining the undesired outcomes that societies have faced along with increased immigration. In Great Britain, the Netherlands and Denmark, religious schools, above all Islamic ones, have been accused of inhibiting the promotion of social cohesion. In Sweden too, some religious schools have been criticised for a perceived deficiency in openness and the practice of democratic values.

It is also interesting that in Great Britain and the Netherlands, despite the positive conclusions arrived at by independent investigators as to the ability of faith schools to produce cohesion, integration or democratic character, negative attitudes towards religious schools have not changed.

In Great Britain and the Netherlands a new compulsory subject, citizenship education, has been adopted in the curriculum, and similar suggestions have been made in Denmark. In Sweden the subject already exists. All of these countries, as well as the Council of Europe, regard it as essential that *all* children not only learn about different ways of living but also acquire the necessary ability to co-operate peacefully with other citizens and have a positive attitude towards the nation. In the previous chapter I argued that the states are departing from the distinction between the public and private sphere by aiming at regulating the minds of citizens, more precisely at creating 'a permanent liberal state of mind' in them, and that education plays a significant role in this process. The official state actions described in this chapter are concrete examples of this. I also want to stress that in all four countries the plural nature of society is seen as something that needs to be managed by applying certain selected choices in the field of education.

It is beyond the scope of this thesis to analyse in depth the content of citizenship education.²⁶ However, there is a point that I want to make here. In their award-winning article,²⁷ 'What kind of Citizen? The Politics of Educating Democracy' (2004), Joel Westheimer and Joseph Kahne write that "there exists a vast and valuable array of perspectives on the kinds of citizens that democracies require and the kinds of curricula that can help to achieve democratic aims" (Westheimer & Kahne 2004, 239). One possible point of criticism is that the strategies adopted by the four countries studied here may

²⁶ In the next chapter I analyse the education for morality and values provided by the schools in each nation.

²⁷ The article received the Outstanding Paper Award for Research in Social Studies from the American Educational Research Association, as well as the Outstanding Paper of the Year Award from the Division on Teaching and Learning of the American Political Science Association.

implicitly represent the interests of the state, but do not necessarily or optimally fulfil the needs entailed by the plural nature of a society: “[f]or example, a focus on loyalty or obedience (common components of character education as well) works against the kind of critical reflection and action that many assume are essential in a democratic society” (Westheimer & Kahne 2004, 244).

This can be seen as the fundamental issue of the legitimacy of civic/citizenship education. Since the assumption is that the reproduction of a nation’s policy or ethos is an important task of education, and keeping in mind that schools are powerful socialisers, there is a risk that the schools will use indoctrination to achieve this. The problem goes as follows: liberal democracy depends on consent for its legitimacy. However, “the quality of that consent is compromised if it is simply manufactured by the state through the school system” (Barry 2001, 231). Thus, while the schools provide an appropriate understanding of citizenship, this can lead to distorted attitudes.

Some scholars have raised this issue and expressed their concern over civic education. Rhys Andrews and Andrew Mycock (2007, 75) point out that in Great Britain the Labour Party’s stress has been on the socialisation of young citizens. The focus of socialisation

has been reframed to address issues of community cohesion, multiculturalism, immigration and identity. The teaching of citizenship in English schools is therefore increasingly justified as necessary for the inculcation of ‘British’ values.

In the Netherlands, as Leeman and Pels (2006, 66) argue, the Dutch educational policy

is now completely oriented to promoting full participation of all children ... Assimilation has become the dominant ideology, in which culture is regarded as a private matter ... In line with this view, the Ministry of Education no longer actively promotes intercultural education. The focus now is on assimilation in the sense of education in the core values of Dutch society.

This criticism is appropriate to a certain degree; in previous chapters we have seen that in all four nations the inculcation of fundamental liberal values is considered necessary, along with the adoption of civic responsibility by all citizens. But we have also seen that the kind of citizenship these nations pursue is not based on these values alone. At least at the level of rhetoric, understanding and ability to create dialogue are high on the list of educational goals. In Great Britain the Crick report states that among the essential elements to be reached by the end of compulsory schooling are the abilities “to co-operate and work effectively with others” and “to consider and appreciate the experience and perspective of others” (QCA 1998, 44).

According to the Education Acts (for both elementary and secondary schools) of the Netherlands, citizenship education is “among others directed towards the pupils’ knowledge of and acquaintance with their fellow pupils’ various backgrounds and cultures” (Thijs et al. 2008, 27). In Sweden the Civics syllabus states that the courses “should be open to different ideas and encourage their expression, as well as promote respect for each person’s intrinsic value, irrespective of gender, class and ethnic background” (Swedish National Agency for Education 2008, 75).

Chapter 5

Values education¹

Introduction

In the previous three chapters I have traced the ways in which cultural plurality is treated in Great Britain, the Netherlands, Sweden and Denmark. I have argued that along with every nation's commitment to the equal and neutral treatment of their citizens and the strong emphasis placed on fundamental values, a new 'super-value', cohesion, has been introduced as an essential ingredient of multicultural policy. Promoting cohesion is seen as a remedy for the unwelcome consequences arising out of increased cultural plurality.

I have also shown that a multicultural society has an increased need to induce people from different backgrounds to tolerate and respect each other, and the schools are regarded as an important institution in this process. As Carolyn Evans (2008, 449-450) writes, "[t]he school curriculum has become the place to solve a whole range of social ills". There is no room for an education where children may become intolerant towards other citizens' ways of life or beliefs. Along with instilling core values, intercultural education – i.e. education aimed at dealing with difference – is also to be promoted.

In this chapter I focus on the inculcation of values and morality in the schools. The empirical material consists of policy documents that dictate educational goals, in particular the content of values education. Needless to say, what happens in practice – that is, what actually happens in the classroom – can be completely different. Nevertheless, these texts are designed to guide public education and they represent the state's official ethos in this matter. It is therefore possible to discuss the different strategy representations adopted by various countries in their policy documents. The survey takes into account all statements referring to values or virtues and dealing with the issue of the plural nature of a society. To give a comprehensive view, the findings are divided into three main themes: (1) explicitly stated values that students are expected to internalise and share; (2)

¹ This chapter deals with policies and approaches concerning educational activities in the area of values, morality and ethics. The term 'values education' is used here to cover all such activities, since morality and ethics are both ultimately concerned with values.

the ethical attitude desired in a student after completing a successful education, and (3) the means and contents of ethical reflection. Each theme is explicated in detail below.

With regard to *explicitly stated values*, I explicate in the case of each nation which values form the society's value base, how they are grounded, and how they are interpreted at different levels of the legislation guiding educational arrangements. I also look at how they differ from country to country. This approach can show what strategy a nation has adopted to deal with the situation of a plurality of convictions. As we have seen, all four nations have had a strong commitment to their basic values. Is this commitment equally clear in education as well?

In Chapter 2 I suggested that in Sweden and Denmark the policy for treating difference also involves the effort to include a historic cultural tradition as part of civic identity. Especially in the case of Denmark it was emphasised that the central values of society are derived from religion. Dominique MacNeill (2000, 351) argues, based on her research on school syllabi in Great Britain, Germany and France, that in these countries even today the definition of national identity incorporates a religious element. In this chapter, I explore whether this is the case in the four countries of concern here, and if so, in what respects this aspect of identity is expected to be adopted or assimilated by students.

A *desirable ethical attitude* here means not only what values and virtues students are expected to assimilate, but also – and more importantly – what is the expected depth of assimilation. My main focus is on exploring the relationship between publicly shared values and those culturally adopted values that a person holds privately. I have argued that Great Britain, the Netherlands, Sweden and Denmark have been interested in creating a strong civil sphere; that citizens adopt a civic identity that is based on the society's core values. But can this distinction between private and public be maintained in education? The concrete question is, how are the society's core values to be dealt with in education? Are they meant to be internalised in such a way that they become part of daily choices, and thus perhaps gradually also part of personal identity, or is the distinction between the public and private spheres maintained? The latter alternative would mean that after a successful process of value transmission, it would still be possible for a person to hold (in private) values that may conflict with the society's central values. It is useful here to quote Terence McLaughlin (1995, 248), who considers that in a multicultural state schools should point out to students that “[w]hether a given action should be accepted or tolerated within a public or civic domain and be legal does not ipso facto make that action fully acceptable morally from all points of view”. Although common values are needed for example for political purposes, wider moral perspectives do exist, and those wider perspectives make a fuller moral appraisal possible. According to McLaughlin, a failure to clarify this point “may lead to pupils

gaining a distorted perception of the moral life.” Therefore, according to McLaughlin,

the school has a principled responsibility to try to avoid giving illicit salience to ‘public’ matters and underplaying the role that reasonable moral views in the ‘non-public’ domain play in overall moral evaluation.

One point I consider here is whether or not the distinction between the private and public is maintained, and if so how.

With regard to the *means and content of ethical reflection* four points are taken into account. The first one arises from the concept of autonomy.² As we have seen, some religious parents want to shelter their children from alien influences. What is often behind this claim is the wish to prevent the child’s development towards a morally autonomous life.³ Especially in the case of some illiberal religions, there is a tendency to emphasise obedience at the expense of full moral autonomy.⁴ According to this very strict interpretation of morality, the values dictated by a given religion are regarded as non-negotiable and are this not a matter of personal choice at all.

I find it useful to frame my enquiry into this matter in terms of the scholarly debate: to what extent does a parent has the right to decide the content of their child’s education, and vice versa to what extent should critical thinking be encouraged in children? Some scholars consider that parents’ should have wide freedom to decide the content of their child’s education, even though the resulting education may not promote the child’s subsequent development towards an autonomous life. Arguments favouring this view tend to be closely connected to the idea that autonomy is not necessarily a crucial value of a liberal theory. Halstead’s argument, presented in Chapter 3, is one example of this; according to Halstead, Muslim parents should have the right to select for their children a form of school that is in accordance with their distinct beliefs and values. Similarly, Chris Hewer (2001, 522) argues that Muslims have a need for a strong cultural identity

² Joseph Raz (1986, 369) defines four prerequisites for an autonomous life, as follows: (i) independence, i.e. the ability to make choices without being coerced or manipulated to do so; (ii) integrity, i.e. the ability to identify with one’s choices and be loyal to the projects and relationships one chooses; (iii) appropriate competence in mental abilities, i.e. a capacity for deliberating, planning, and making choices; and (iv) an adequate range of options for choices, not only between good and evil but also between different goods, (Raz 1986, 369).

³ By moral autonomy I mean that a person is able to think whatever they like about moral matters, make up their own mind in moral issues, decide for themselves what they ought to do, choose their own moral position, etc.

⁴ In Chapter 3 I introduced the criticism of Kymlicka’s autonomy-based liberalism presented by Tamir (1995) and Strike (1998), and their arguments in favour of non-autonomy-based liberalism.

school, whose pedagogy reflects an epistemology of divine revelation: there are no secular subjects within the Islamic world view, and thus “[e]very aspect of study of should be permeated by Islamic values and the divinely ordained harmony should be brought out by educational process.”

The logic of the criticism of education for autonomy can be formulated as follows: if autonomy entails the ability of a person to choose for themselves a good life, or a “commitment to sustained rational examination of self, others and social practices” (Galston 1995, 521), then by demanding for example an education that endorses autonomy a choice is already made for many people, since one conception of a good life is preferred to others. To embrace autonomous choice in education, Galston (1995, 523) argues, is “in fact to narrow the range of possibilities available within liberal societies”. Thus, the argument goes, the inculcation of autonomy is a violation of neutrality by the state.

There are, however, a number of scholars who, like Kymlicka, interpret liberal theory completely differently; they see legitimate parental interests with regard to the content of their children’s education as much more narrow than argued for example by Halstead and Hewer. According to Barry (2001 224), the inherent goal of education is not to produce autonomous citizens but to provide students with the widest possible range of the arts, the humanities and the sciences. Barry’s view is based on a conception of what capacities citizens need in a multicultural society. He does not argue that the capacity for autonomy should not be developed. Rather, autonomy is a by-product of successful teaching. Piet van der Ploeg (1998, 178), on the other hand, considers that education should enable pupils not only to assert a particular view of the good life, but also to step back from this view and subject it to critical analysis: democratic government must protect children from an education that frustrates their “ability to think and judge for themselves”. It is in fact a government responsibility to safeguard children’s future autonomy.

Jackson (2004a, 54) writes that in principle there is no rigid dichotomy between religious nurture and the development of autonomy; autonomy is always ‘relative’, in the sense that “consideration of others in relation to oneself is an important factor in autonomous decision making”. However, he is strongly of the opinion that the schools should teach critical thinking; one of the key issues for all types of schools is that “pupils are taught and encouraged to use skills of critical enquiry so they can scrutinize and reflect upon beliefs and values they encounter.”

There are also scholars who agree that the development of students towards an autonomous life is an important educational goal, but see faith schools as capable of achieving this goal. For example McLaughlin (1984, 82) argues that “[i]f the parent avoids indoctrination and takes ... steps to safeguard autonomy such as accepting the eventual exposure of his child to other influences which might help him to form his life ideals”, there is little

fear that the development of the child's personal or moral autonomy will be in danger.⁵ According to him, "[t]his has important implications for the kind of rights they can legitimately claim over the subsequent formal education and schooling of their children." Johan De Jong and Ger Snik similarly defend the right of denominational schools to exist, on the basis that they provide "the child with an initial and stable conception of the good as a starting point for autonomous reflection" (De Jong & Snik 2002, 583).

The second point to be taken into account with regard to the means and content of ethical reflection can be formulated in the form of a question: What is the depth and content of values education? For example Graham Haydon (1995, 60) argues that the relevant capacities needed by pupils as future citizens in a culturally diverse society involve knowledge, understanding, and critical reflection. The essential point, however, is that these capacities should be exercised on moral issues, because many of the decisions and choices that come up within the public forum involve such issues. According to Haydon it is not enough even to be able to offer reasons for one's own moral position, since "very often it is also necessary to *understand* something of the opposing positions, in order to be able to counter objections which will come from them" (Haydon 1995, 61; italics added):

there is a need for education, not just in morals, but about morality; an education that will give people some knowledge and understanding not just of the variety of moral positions in the world, but of the various ways in which moral values enter into people's lives and some knowledge, too, of the kinds of arguments that have been used to support moral positions and, unavoidably, of the existence of various sorts of scepticism about morals (Haydon 1995, 62-63).

Haydon (1995, 63) considers that the discussion of moral issues is important in educating pupils to be able to co-operate in a plural society. Giving pupils access to the realm of morality will enable them to understand not only their own moral positions but also each others'.

⁵ In his article 'Religious upbringing reconsidered' (2002), Michael Hand asks whether or not it is (logically) possible to give religious instruction and simultaneously be able to avoid indoctrination. Hand's negative answer is based on the position that religious facts are not known to be true. According to Hand, religious beliefs should be held on the basis of evidence and should be open to revision and correction; the indoctrinated child's beliefs are locked, and thus immune to rational appraisal. (Hand 2002, 553-554). Charlene Tan, in criticising Hand's argument, points out that "scientific knowledge is not metaphysically neutral, since research functions within a paradigm involving metaphysical assumptions" (Tan 2004, 259; citing Puolimatka 1996, 112). See also Jim Mackenzie's (2004) critique of Hand. With regard to the question of proof, MacKenzie (2004, 130) argues that scientific knowledge is always social.

The third point to be taken into account with regard to ethical reflection is that, while from the public perspective some ways of life are seen as undesirable because they do not consider certain democratic values legitimate,⁶ it would be wrong to say to someone who has grown up to cherish those values that they are completely false.⁷ This leads to the question: from what perspective should moral evaluation take place in schools? According to Jackson (2004b, 4) issues concerning the truth of a particular religion “cannot be resolved publicly”. His solution is based on the idea that in evaluating for instance the truth-value of a particular moral belief, the reference point is the individual pupil: pupils are encouraged to participate in epistemological and ethical debate at their own level. The Council of Europe has launched a program entitled *A New Challenge to Intercultural Education: Religious diversity and dialogue in Europe* (2007). Micheline Milot (2007) writes of the capacities for tolerance, reciprocity and civic-mindedness that a school should promote in children. According to Milot, civic-mindedness is primarily a cognitive ability, consisting of the capacity to stand back from one’s own conviction. This should not be confused with radical criticism of traditional norms or with relativism, although it “does involve a certain ability for distancing oneself from values and beliefs to which one subscribes”. The essential point is to make pupils “acknowledge that convictions are always valid from a particular point of view, in particular that of the community that holds them”. (Milot 2007, 27.)

Fourth and finally, I examine the documentary material to see whether morality is seen as a phenomenon with its own independent existence, or as dependent on religion. In other words, when moral issues are considered, does this take place within a framework of moral principles provided by one or more specific religions, or does moral reflection, and the discussion of right and wrong, extend in the direction of philosophy as well?

Great Britain⁸

Explicitly stated values

The British Education Act does not explicate the values that should guide schooling; this takes place in the National Curriculum. Under the heading ‘Values and purposes underpinning the school curriculum’ in the National

⁶ A common example of such a value is gender equality. It is also possible that in a certain culture equality between the sexes is valued but is interpreted differently from the way it is understood in Western democracies. It might be the case that there are for instance different tasks for each sex.

⁷ This is essentially the same notion presented by McLaughlin (1995, 248) concerning the importance of maintaining the distinction between the public and private in values education (see above).

⁸ In this chapter I concentrate on the documents that guide schooling in England.

Curriculum for England, for pupils between 5 and 11 years old we find the following: “[e]ducation influences and reflects the values of society, and the kind of society we want to be”. The text goes on to say that it is important “to recognise a broad set of common values and purposes that underpin the school curriculum and the work of schools” (QCDA 2010).

These ‘common values’, however, are not explicated in detail; the text merely mentions that schools “may wish to take account of the statement of values” by the National Forum for Values in Education and the Community (1997). There we find four core values briefly explicated, along with recommendations as to what should be done “on the basis of these values”. This “statement of values” appears rather general:

- (i) The self: “We value ourselves as unique human beings capable of spiritual, moral, intellectual and physical growth and development.”
- (ii) Relationships: “We value others for themselves, not only for what they have done or what they can do for us.”
- (iii) Society; “We value truth, freedom, justice, human rights, the rule of law and collective effort for the common good.” This includes for example “respect for religious and cultural diversity.”
- (iv) The environment. (National Forum for Values in Education and the Community 1997.)

The generic nature of the list is due to the need to define values that are widely accepted. Compared to the documents presented in the previous chapters, the difference is that these values are not being prescribed. Rather, their validity is justified by referring to the imagined *fact* that there is general agreement on them: “The remit of the Forum was to decide whether there are any values that are commonly agreed upon across society, not whether there are any values that *should be* agreed upon across society” (National Forum for Values in Education and the Community 1997; italics added). It is also maintained that regardless of the supposed agreement on these values, they are not derived from one single source, and thus may have different interpretations when it comes to applying them in practice:

Agreement on the values outlined below is compatible with disagreement on their source.

Agreement on these values is compatible with different interpretations and applications of them. (National Forum for Values in Education and the Community 1997.)

It is worth mentioning that the values explicated in the National Curriculum for England for secondary education are exactly the same as those stated in the National Forum for Values in Education and the Community (QCDA 2010). These values are also mentioned in the Foreword to a guidebook for

religious education, *Religious Education: The non-statutory national framework* (QCA & DfES 2004).

In sum, it can be argued that the values that guide schooling are presented with some caution; in this sense, the policy differs from the government statements discussed in previous chapters. It is worth noting that gender equality, for example, is not mentioned at all in the list of important values.

Desirable ethical attitude

In considering what kind of ethical orientation pupils should possess after a successful education, there are two perspectives that need to be taken into account: the individual's development towards moral autonomy, and the interests of the society. It is obvious that the overarching aim of education, at least in a present-day Europe, is the personal development of the individual. Interestingly, the objectives explicated in this respect are rather abstract. The National Curriculum for pupils between 5 and 11 years says, simply, that "education should promote pupils' ... moral development". For children between 11 and 16 it is mentioned that pupils should have "secure values" and "principles to distinguish right from wrong". These "secure values and principles" are the ones referred to above. (QCDA 2010.)

Moral autonomy as an educational goal does not mean complete freedom in moral matters. Freedom is exercised within a certain framework, and here the interests of British society enter into the picture. The main objective in this area is for pupils to recognise their responsibilities and be willing to contribute their share to the common good. According to the National Curriculum for pupils between 5 and 11, education should "prepare all pupils for the opportunities, responsibilities and experiences of life." In the section 'Aims of education' for pupils between 11 and 16, it is stated that education should "enable all young citizens to become ... responsible citizens who will make a positive contribution to society". (QCDA 2010.)

The question to ask is, what does 'responsibility' mean in this context? In the case of pupils between 11-16 in the National Curriculum, responsible citizens have the following virtues: they are able to manage diversity in a respectful manner and to work co-operatively, they understand one's own and other people's cultures and traditions, they appreciate the benefits of diversity, and they are committed to human rights while challenging injustice (QCDA 2010).

The same goes for the non-statutory framework for the subject 'Religious Education' (QCA & DfES 2004). Under the heading 'The importance of religious education', respect for others is clearly emphasised: RE "offers opportunities for personal reflection and spiritual development", but it also plays an "[i]mportant role for preparing for adult life" by enabling "pupils to develop respect for and sensitivity to others, in particular those

whose faiths and beliefs are different from their own.” Religious education also promotes discernment and enables pupils to combat prejudice. (QCA & DfES 2004, 7.) Under the heading ‘The contribution of religious education to the school curriculum’, specific emphasis is placed on the celebration of diversity in society through an understanding of similarities and differences (QCA & DfES 2004, 8; see also p. 13 and the section ‘Attitudes in religious education’).

In previous chapters I have shown that every citizen is expected to assimilate the virtues that enable peaceful co-operation among citizens. The goals of moral education are quite similar. The non-statutory framework for religious education provides a good example:

Religious education provides opportunities to promote *moral development* through enhancing the values identified within the National Curriculum, particularly valuing diversity and engaging in issues of truth, justice and trust (QCA & DfES 2004, 14; italics in original).

In sum, the outcome of the right moral development is a person who values diversity, has a positive attitude towards others, and has the ability to co-operate. The point is that it would be a matter of educational failure if a student did not possess these values and virtues.

What is said above might be regarded as a rather trivial conclusion. It is clear that peaceful co-existence requires that citizens tolerate each other and share certain common values. The point is, however, that special programmes are needed, designed to achieve this goal. It is not believed that an ‘invisible hand’ can do the job. From this perspective, doubts as to the possible contribution by faith schools in promoting cohesion becomes more understandable, since in those schools ‘understanding of others’ is perhaps less prominently stressed.⁹

Means and content of ethical reflection

Schools have two subjects where the practice of moral reflection takes place: ‘religious education’ and ‘citizenship education’. One important difference between them is that citizenship education is a compulsory subject, with no possibility of exemption; in contrast, a pupil can be “wholly or partly excused from receiving religious education given in the school” (OPSI 2010, Education Act 1996, section 389).

An important part of the content of RE consists of ethical issues.

⁹ In the previous chapter I introduced the most recent Ofsted report on faith schools. The report noted that the schools were less successful in giving knowledge about other ways of life: “many of the schools visited were reluctant to teach about other faiths in great detail” (Ofsted 2009, 9).

According to the non-statutory framework for religious education, “[a]t the heart of this national framework for religious education is a focus on ultimate questions and ethical issues” (QCA & DfES 2004, 8). The goal is for pupils to have an ability to independently reflect upon matters that influence moral decisions:

Religious education ... enhances the capacity to think coherently and consistently. *This enables pupils to evaluate thoughtfully their own and others' views in a reasoned and informed manner.* (QCA & DfES 2004, 8; italics added.)

According to the recommendations for the content of education, the development of moral autonomy starts with issues of religion; this is followed by a gradual expansion towards philosophical argumentation and everyday matters. In this sense, morality is not tied to any particular religion. In the section ‘Knowledge, skills and understanding’ for pupils between 7 and 11, we find that learning *about* religion means that “pupils should be taught” to be able to “describe and begin to understand religious and other responses to ultimate and ethical questions”. Learning *from* religion, on the other hand, means that pupils should be taught to “reflect on ideas of right and wrong and their own and others’ responses to them”. (QCA & DfES 2004, 26.) At the next stage (pupils from 11 to 14 years) we see a widening perspective on philosophical argumentation. Learning about religion at this level means cultivating the ability to “analyse and compare the evidence and arguments used when considering issues of truth in religion and philosophy”, while learning from religion means that pupils are able to “reflect [upon] and evaluate their own and others’ beliefs about world issues such as peace and conflict, wealth and poverty, and the importance of the environment, communicating their own ideas” (QCA & DfES 2004, 28). At this level ‘Breadth of the study’ means, among other things, “reflecting on and carefully evaluating their own beliefs and values and those of others in response to their learning in religious education, using reasoned, balanced arguments” (QCA & DfES 2004, 29).

Finally, for pupils 14-16 years of age, learning about religion means that they should be taught to “think rigorously” and be able to “present coherent, widely informed and detailed arguments about beliefs, ethics, [and] values” as well as to draw “well-substantiated conclusions.” Learning from religion should enable pupils to “reflect on, express and justify their own opinions in light of their learning about religion and their study of religious, philosophical, moral and spiritual questions”, and to “develop their own values and attitudes in order to recognise their rights and responsibilities in light of their learning about religion”. (QCA & DfES 2004, 30.)

In sum, morality is seen as a phenomenon independent from religion, and the aim of education is clearly to make pupils self-sufficient in making moral choices. This means that pupils are taught to make moral decisions

through reflecting upon the evidence, not relying for example on religious authority.

At this point, it is illuminating to focus on how ‘controversial issues’ are to be dealt within the British education system. In the Crick report, a controversial issue is defined as follows:

A controversial issue is an issue about which there is no one fixed or universally held point of view. Such issues are those which commonly divide society and for which significant groups offer conflicting explanations and solutions. There may, for example, be conflicting views on such matters as how a problem has arisen and who is to blame; over how the problem may be resolved; over what principles should guide the decisions that can be taken, and so on. (QCA 1998, 56 par 10.2.)

The report also states that controversial issues are likely to arise in RE:

Controversial issues can arise in the teaching of virtually every subject. ... Religious Education probably embraces the very essence of controversy, dealing as it does in foundations of moral behaviour and the purpose and meaning of life. (QCA 1998, 56 par 10.3.)

The starting point in the Crick report is that issues that might be seen as difficult to deal with because of their controversial nature are not set aside, but on the contrary are seen as an essential element in the content of education in a plural society. Two independent arguments are given in favour of this kind of action. The first is based on society’s interest in producing citizens who are open-minded, the second on the individual’s need to live in a multicultural nation. The point is that the introduction and discussion of controversial issues in education will enhance not only “a willingness and empathy to perceive and understand the interests, beliefs and viewpoints of others”, but also “a willingness and ability to apply reasoning skills to problems and to value a respect for truth and evidence in forming or holding opinions.” (QCA 1998, 57 par 10.6.)

The Crick report also refers to the Education Act from 1996:

The Education Act 1996 aims to ensure that children are not presented with only one side of political or controversial issues by their teachers. Section 406 of the Act (Political indoctrination) requires school governing bodies, head teachers and local education authorities to forbid the promotion of partisan political views in the teaching of any subject in schools; and to forbid the pursuit of partisan political activities by pupils under age 12 while in school. Section 407 (Duty to secure balanced treatment on political issues) requires them to take all reasonably practical steps to ensure that,

where political or controversial issues are brought to pupils' attention, they are offered a balanced presentation or opposing views. (QCA 1998, 56.)

In sum, the Crick report argues that children need to know about the nature of society:

Many controversial topics are major issues of the day: moral, economic, political and religious issues which young people ought to know about either because the issue could directly affect them or because they will in some way in a democratic society have opportunities to take a part in influencing the outcome. ... [Thus] to omit informing about and discussing them is to leave a wide and significant gap in the educational experience of young people, and is to fail to prepare them for adult life. (QCA 1998, 57 par 10.4.)

The same ideas are found in the guidebook *Citizenship: A scheme of work for key stage 3*.¹⁰ *Teachers Guide* (QCA & DfES 2001). The guidebook states that teachers will need to “ensure that pupils have access to balanced information and differing views, on which *they can then clarify their own opinions and views*, including contributions made by visitors to the classroom” (QCA & DfES 2001, 46; italics added). But there are also skills that a student needs in order to be able to function successfully in a society:

Learning from real-life experience is central to citizenship, and sensitive and controversial issues are certain to arise. *Pupils should not be sheltered from them*; through them pupils can develop an important range of skills, including listening, accepting another point of view, arguing a case, dealing with conflict, and distinguishing between fact and opinion. (QCA & DfES 2001, 46; italics added.)

The same ideas are also to be found in the handbook *Making Sense of Citizenship: A continuing professional development handbook* (2006).¹¹ In the chapter ‘Learning and Teaching Strategies’ we find the following:

Topical and controversial issues are part of life. Students are aware of and want to talk about and understand such issues. To shelter students from them is to leave them ignorant about some of the major issues of the day and unprepared to deal with them. (Huddlestone & Kerr 2006, 106.)

¹⁰ Key stage 3 means pupils between 11 and 14 years.

¹¹ The handbook was developed by the Citizenship Foundation and the Association for Citizenship Teaching, in association with Citized, the DfES, QCDA, and Ofsted.

As a conclusion, it can be stated that given the British educational system's strategy for dealing with controversial issues, the attempt to have pupils obtain information and understanding about different moral positions may lead to a situation where pupils start to question the moral authority of the family. This in turn means that pupils may start to think that the society offers reasonable alternatives to the moral positions learned at home, or even that other convictions might be the basis of a better way of life.

The Netherlands

The possibility of analysing the position of values education in the Netherlands as comprehensively as that in England is limited due to the absence of any centrally prescribed curricula or syllabi for religious or citizenship education. The Dutch education system is based on a model where the general aims and purposes of education are laid down legislatively in education acts. Each type of education – primary, secondary, adult, special, vocational, and higher education – has its own legislation. The Ministry of Education, Culture and Science then sets quality standards that apply to both public and private education, prescribing for instance the subjects to be studied and their attainment targets. Within this framework, schools have the freedom to define their own specifications and choose their own pedagogical approach, their own curriculum, textbooks and other educational materials. (Bron & al. 2007, 16; 19; 27.)

In this system, religious education has quite a peculiar status. While under the terms of the Primary Education Act religious and ideological movements must be included in the curriculum, RE is not a compulsory school subject. It is up to the individual school to decide whether the subject is compulsory or optional. In either case, RE is not taught by school staff but by representatives of churches or other religious groups. It was not until 2004 that the government decided that RE teachers in public primary schools should have the same professional competence as other teachers. The practice is different in public secondary schools, where the subject is taught by special RE teachers. (Kuyk 2007, 137-138.)

One obvious outcome of this kind of arrangement is that the content of RE differs from school to school. As Kuyk (2007, 137-138) writes:

The aims of RE can differ widely, ranging from getting the pupils related to a particular denomination or confirming that particular denominative affiliation to aiming to help pupils to relate to their life world including the religious aspect. Any other special aim is possible, and indicates the possible variety of RE, its method and syllabuses.

Explicitly stated values and desirable ethical attitude

According to the Primary Education Act of the Netherlands, the schools must instil in pupils skills and insights, such as behaviour that shows respect for generally accepted norms and values, as well as knowledge of and respect for religious and other beliefs that play an important role in Dutch society (Eurybase 2006/07, 45). As indicated in the previous chapter, one important issue in recent policy discussions has been the aim of strengthening social cohesion and stimulating active citizenship. According to the publication by the Netherlands Institute for Curriculum Development (SLO), *Inclusive Education in the Netherlands* (2009), “‘belonging and connectedness’ are important values” in Dutch education (Thijs et al. 2009a, 41).

Following the decision to implement citizenship education as an obligatory subject, the Primary and Secondary Education Acts were amended in 2006 with an additional specification: education should enable pupils to become integrated into society and to be familiar with the various cultural backgrounds of their fellow pupils (Thijs et al. 2009a, 39). The Acts oblige the schools to promote active citizenship and ensure that pupils not only acquire knowledge about different cultures and philosophies of life but also get to know children of the same age from different backgrounds. Annette Thijs et al. (2009a, 44) define these aims as follows:

Active citizenship refers to the willingness to be part of a community and to make an active contribution to it. Social integration refers to the participation of citizens (irrespective of their ethnic or cultural background) in society, which means social integration, as well as participation in society and its institutes, and eventually familiarity with and involvement in cultural phenomena in the Netherlands. (Italics added.)

Here we see clear indications of the kind of citizen aimed at in citizenship education. The implementation of citizenship education is controlled by the Dutch Inspectorate of Education. Schools have an obligation to inform the Inspectorate as to the goals and activities they organise to foster active citizenship and social integration. However, although obligatory, citizenship is not an independent subject. Schools are free to determine how it is integrated into their curriculum. (Thijs et al. 2009a, 44.)

Despite the absence of centrally prescribed curricula or syllabi for RE or citizenship education, the desired ethical attitude can be tracked in at least two documents. The first is *A School Culture That Unites*, published in 2007 by the Netherlands Education Council (Onderwijsraad); it lays down guidelines for the schools to create a ‘sense of community’. The basic idea in the document is that a school should be a multicultural community, a ‘world school’; “a meeting place for different cultures”, where no priority is given to any conviction or religion. The framework binding this community together, however, is also clearly defined: schools should “see themselves as Dutch

schools with Dutch standards and values”. (Onderwijsraad 2007, 1.)

The need for pupils to assimilate core values is also present in the following recommendation by the Education Council for schools to “[u]rge pupils to share responsibility through citizenship education”:

Citizenship education should be a part of daily school life as well as the curriculum. *It should focus on essential values and principles*, but also on smaller *virtues* such as *respect for others* and common courtesy (Onderwijsraad 2007, 2; italics added).

The desired ethical attitude can also be tracked from those general objectives that the Ministry of Education, Culture and Science has assigned to schools. The most recent version of core objectives for primary education in the Netherlands was published in 2006, and includes 58 objectives. In the introduction, one of the three important functions of core objectives is defined as “equipment for participation in society” (Bron & al. 2007, 19).

One ‘learning area’ where core objectives have been defined for primary education is ‘Personal and world orientation’. It is described as follows:

In this learning area, pupils orientate on themselves, on how people relate to each other, how they solve problems, and how they give meaning to their existence. ... At the same time, *society*, in which the children are growing up, *is making its demands*. Children are fulfilling, and will fulfil, tasks and roles, for which education is preparing them. These concern the role of consumer, the role of traffic participant, and *the role of citizen* in a democratic constitutional state. Knowledge about and *insight in important values and standards*, and knowing how to act accordingly, are preconditions for coexistence. Respect and tolerance are forms of these. (Bron & al. 2007, 80; italics added.)

Part of ‘Personal and world orientation’ consists of Social Studies. Among the core objectives for social studies are the following:

- (i) Pupils should learn about the essentials of Dutch and European politics and the duties of a citizen (objective number 36);
- (ii) They should learn to behave from a sense of respect for generally accepted standards and values (objective number 37);
- (iii) They should learn about the essentials of religious movements that play an important part in the pluralistic Dutch society, and should learn to respect people’s differences of opinion (objective number 38). (Bron & al. 2007, 81.)

Summing up, it can be argued that there is a strong tendency to have pupils assimilate the responsibilities of citizens. These include the core values and standards of the society, along with the ability to live with other citizens who

may have different visions as to how to lead a good life. In this sense, the Dutch case is very similar to that of England.

Ethical reflection

In 2006 a new set of core objectives was introduced to the secondary education as well. In those objectives the idea of developing moral independence in pupils is expressed. Under the heading 'Man and society' we find twelve objectives; the first one (objective number 36) is that "[t]he pupil learns to ask meaningful questions about social issues and phenomena, *take a substantiated point of view concerning these*, defend it, and deal with criticism in a respectful way" (Bron & al. 2007, 88; italics added). According to the eighth goal (objective number 43),

[t]he pupil learns about agreements, differences and changes in culture and religion in the Netherlands, learns to connect his or her own, as well as someone else's lifestyle with these, and learns that respect for each other's views and lifestyles will enhance society (Bron & al. 2007, 89).

It is clear that the purpose of moral reflection is to enable pupils to independently create their own moral point of view. With regard to the means or content of moral reflection, however, teachers are not provided with similar guidelines as in Britain. Thijs et al. (2009b) refer to a study indicating that teachers are concerned about this; they do not always feel adequately equipped to deal with diversity in a positive way. They would like to learn more for example about how to discuss moral issues that touch upon deeply rooted cultural and religious ideals and assumptions. This also applies to other dimensions of citizenship education, such as creating a positive attitude towards each other's way of life.

It seems to be the case that citizenship education in the Netherlands has not succeeded as planned. According to a publication by the National Institute for Curriculum Development (SLO),

[a] recent study of the Dutch Inspectorate (2007) shows that most schools currently engage in some [form] of promoting active citizenship and social integration. While there is a lot of willingness and many initiatives are developed, a wider vision and a systematic approach to achieving the set objectives is not always in place. (Thijs et al. 2009a, 44.)

In another study, *Dealing with cultural diversity (Omgaan met culturele diversiteit)*, under the heading 'From vision to policy and what is offered', we find the following:

In line with the experiences of the Inspectorate it can be said that at

the investigated schools there is no structural and explicit translation from vision towards policy and what is offered. Policy is formulated fractionally and does not connect with learning how to deal with differences. What they offer in most schools is dependent on the individual teachers and the general method that is used in teaching. (Thijs et al. 2009b, 38.)

It may be that the broad freedom of schools guaranteed by the Constitution may have become an obstacle to achieving the goals set for citizenship education. According to the SLO publication *Core affairs - The Netherlands*,

What we now see in the Netherlands, is a movement towards deregulation and increasing autonomy of schools. Development of individual talents is supported and schools are looking for ways to design learning environments in which these talents will flourish. At the same time, there is a continuous concern for quality and social stability, among other things infused by societal values and common standards. (Bron & al. 2007, 6.)

It is also worth noting here how intercultural education was carried out before the implementation of citizenship education. On the basis of several studies, Yvonne Leeman and Trees Pels (2006, 70) argue that intercultural education is mainly about tolerance and about facing the situation of diversity in a safe atmosphere in the classroom, with a focus on individual rather than group differences. What has been lacking, Leeman and Pels argue, is a “reflective stance on inequalities” (Leeman & Pels 2006, 71) and an orientation toward a critical analysis of Dutch society “in terms of distributive and cultural justice” (Leeman & Pels 2006, 64). The writers would want greater emphasis on cultural meanings and on the role of cultural identities (Leeman & Pels 2006, 71-73).

Sweden

Explicitly stated values

As we saw in previous chapters, Sweden’s strategy for dealing with a plurality of convictions is a strong commitment to what are perceived as central democratic values. In Chapter 2, I wrote that in the mid-1980s Sweden was forced to make some clarifications to the concept of ‘freedom of choice’. It was made explicit that freedom of choice did not apply to “all lifestyles, norms, values, customs and practices” (Riksdagen 1986, 20). In 1990s the government further took the position that ‘Swedishness’ does not lie in a common historical origin but in a contemporary commitment to Sweden and its social order, the basic values of democracy and equal rights, and intrinsic human values (SOU 1996:55, 354; in Graham 1999, 120).

According to the Swedish Constitution, “[t]he public administration

shall promote the ideals of democracy as guidelines in all sectors of society” (Riksdagen 1974, Ch 1, Art 1, par 3). These same values also form the foundation of the Swedish educational system. The concept of “society’s fundamental values” is referred to in the Education Act, in the National Curriculum, and in the syllabi for the ‘compulsory school’, i.e. the primary and secondary school common to all children.¹² In the National Curriculum the terms “society’s fundamental values” and “fundamental democratic values” seem to have the same meaning. The values and virtues explicitly defined in the Curriculum are the intrinsic value of each person, the importance of the shared environment, the rejection of racism, the inviolability of human life, individual freedom and integrity, the equal value of all people, equality between women and men, and solidarity towards the weak and the vulnerable. (Swedish National Agency of Education 2006, 4.)

In addition to these democratic values, and perhaps surprisingly, another ethical perspective is also introduced in the curriculum:

In accordance with the ethics borne by Christian tradition and Western humanism, this [internalising the society’s basic values] is achieved by fostering in the individual a sense of justice, generosity of spirit, tolerance and responsibility (Swedish National Agency of Education 2006, 3).

This is the only time that these two traditions are mentioned in the National Curriculum. What is interesting, however, is the clear role assigned to Christianity as an essential part of Swedish heritage, especially the contribution of Christianity to the current values of Swedish society. In the syllabus for RE, this is expressed as follows: “Swedish society is strongly influenced by the values and standards of Christianity” (Swedish National Agency for Education 2008, 73). It is also regarded as vital that students understand the role played by Christianity in the course of Sweden’s history:

[Pupils should] have a knowledge of the influence of Christianity on Swedish society, its basic values, traditions, art and literature (Swedish National Agency for Education 2008, 74).

An understanding of Swedish society and its values is deepened through a knowledge of the Christian traditions which have been dominant in Sweden (Swedish National Agency for Education 2008, 71).

The school in its teaching of Religion should aim to ensure that pupils ... develop an understanding of how Christianity has influenced Swedish society (Swedish National Agency for Education

¹² The Education Act states that “[s]chool activities shall be structured in accordance with fundamental democratic values”; in the National Curriculum the first sentence says that “Democracy forms the basis of the national school system”, and the syllabus refers both to the Education Act and to the Curriculum.

2008, 71-72).

An important finding with regard to the National Curriculum is that when it comes to tradition it is not only about giving pupils knowledge but also about having pupils adopt Sweden's national cultural heritage, in which Christianity is an essential element:

In a deeper sense education and upbringing involve developing and passing on our cultural heritage – values, traditions, language, knowledge – from one generation to the next (Swedish National Agency for Education 2006, 5).

The point seems to be that the condition for being able to function well in society is that pupils assimilate the Swedish cultural heritage at least to some extent: “[a]wareness of one’s own cultural origins and sharing a common cultural heritage provide a secure identity” (Swedish National Agency for Education 2006, 4). Interestingly, the idea of sharing a common heritage is represented here exclusively as a helpful benefit for the pupil. It is worth noting that neither in Britain nor in the Netherlands do we find similar ideas, at least in the official documents discussed and referred to in this thesis.

Desirable ethical attitude

With regard to the ethical attitudes that are the goal of Sweden's values education, it can be said without hesitation that pupils are intended to deeply assimilate democratic values. The expressions used in the National Curriculum and in the Syllabus for Social Studies, which includes RE and Civics, leave no room for speculation:

The school has the important task of imparting, instilling and forming in pupils those fundamental values on which our society is based (Swedish National Agency for Education 2006, 3).

It is important that each person develop *a personal attitude and a belief* in the fundamental values of democracy *as a starting point for their thinking* and action over political, economic and *existential issues* (Swedish National Agency for Education 2008, 59; italics added).

It is equally clear that these values are regarded as non-negotiable:

All who work in the school should uphold the fundamental values that are stated in the Education Act and in this curriculum, and should very clearly disassociate themselves from anything that conflicts with these values (Swedish National Agency for Education 2006, 3).

From the perspective of equal treatment of citizens, and especially from the parental point of view, as discussed in the introduction to this chapter, a possible point of criticism is the depth of internalisation of these fundamental values. The objective of values education in Sweden seems to be for democratic values to become the reference point of the student's overall moral reflection. For example the following sentence in the curriculum supports this conclusion:

The school should actively and consciously influence and stimulate pupils into embracing the common values of our society and [should] express these in practical daily action (Swedish National Agency for Education 2006, 8).

A possible and even desirable consequence of values education is that the society's values will gradually supersede conflicting values adopted at home. It is thus obvious that the distinction between public and private values cannot be maintained.

However, while fundamental values are to be assimilated, this is not the whole picture of Sweden's values education. Another important goal is to prepare students for life in a multicultural world and to help them accept the fact that people think differently in moral matters:

The internationalization of Swedish society and increasing cross-border mobility place great demands on people's ability to live together and appreciate the values that are to be found in cultural diversity (Swedish National Agency for Education 2006, 3-4).

In an international society based on ethnic and cultural diversity, how people think, act and shape their lives is of growing importance. The subject [RE] contributes to an understanding of traditions and cultures, and thus provides a foundation for confronting xenophobia, as well as developing pupils' respect for tolerance. (Swedish National Agency for Education 2008, 71.)

[Social] studies cover cultural diversity as a basic feature of Swedish society, where different traditions, belief systems and views of life exist side by side and influence each other (Swedish National Agency for Education 2008, 59-60).

In addition to teaching pupils to tolerate difference, there is also a tendency to create in them a respect or empathy towards different value systems:

[I]t is important to develop ... the ability to empathise with the values and conditions of others. The school is a social and cultural meeting place with both the opportunity and the responsibility to foster this ability among all who work there. (Swedish National Agency for Education 2006, 3-4.)

What is interesting here is that the ability to empathise is extended to other people's values, not only to other citizens.

Means and content of ethical reflection

There are two subjects where moral matters are dealt with, RE and Civics. The main responsibility falls on RE; here an important goal is to make students aware of different ethical positions and to make them independent in moral matters. Discussion or reflection is used as a device in the process of developing students' moral autonomy:

An ethical perspective is of importance for many of the issues that are taken up in the school. This perspective should permeate school activity to provide a foundation and support for pupils to develop their ability to form personal standpoints. (Swedish National Agency for Education 2006, 6.)

An important element in social studies is to encourage pupils to differentiate between and work through situations involving ethical choices, arguing for and seeing the consequence of different views and approaches (Swedish National Agency for Education 2008, 59).

In the RE syllabus, the goal by the end of fifth year is for the pupils to be "able to discuss ethical problems and provide reasons for their views"; by the end of the ninth year they should "be able to reason ethically and see the consequences of different ethical views" (Swedish National Agency for Education 2008, 74).

How does this happen? According to the chapter "Goals and Guidelines" of the Curriculum, the teacher should "openly present and discuss different values, ideas and problems" (Swedish National Agency for Education 2006, 9). This approach is not limited to religion as a phenomenon. Rather, it starts with the lives of young people:¹³

Everyday ethical issues are a starting point for reflection and discussions in the subject [of Religion]. Discussion on ethical issues may be deepened through familiarity with ethical principles, thinking and systems from different religions and outlooks on life. (Swedish National Agency for Education 2008, 73.)

¹³ Almen (2000, 85) writes that this approach has its roots in the 1940s, since "many atheists and agnostics felt that the religious education of that time implicitly denied that it was possible to have a serious and well grounded morality when you were not a Christian". As noted in Chapter 4, in Sweden the aim was to have a unified school that would be accepted by all. Thus the idea of 'perspectives on life' ('livsåskådning') was emphasised.

Above, I suggested that one aspect of a desirable ethical attitude is empathy towards others and the values they hold. One tool for achieving such an attitude is to present information about values as contingent. In other words, information about values is treated as a mental construction about reality, not necessarily as a ‘true’ reflection of that reality:

A basis for tolerance towards those who think differently is created by an understanding that phenomena can be understood in different ways by different people, depending on, for example, gender, class and ethnic affiliation (Swedish National Agency for Education 2008, 59).

This approach is close to the ideas of Rawls and Milot, discussed above. The point is that convictions are meant to be presented as valid specifically from a particular point of view, especially from that of the community that holds them.

Denmark

Explicitly stated values

The Danish school system is regulated by the ‘Folkeskole (Consolidation) Act’ (2000) which provides the overall framework for the school activities. According to the Folkeskole Act,

The school shall prepare the pupils for participation, joint responsibility, rights and duties in a society based on freedom and democracy. The teaching of the school and its daily life must therefore build on intellectual freedom, equality and democracy. (Danish Ministry of Education 2010, par 1.3.)

Similarly to the Netherlands, the state does not provide any common curriculum for schools to follow. Each individual school has to develop its own curriculum, which must be approved by the municipal council. There are, however, certain ‘Common Goals’ (*Fælles Mål*), provided by the Ministry of Education for each subject, in which the aims and standards are explicated in detail. The most recent set of *Fælles Mål* was introduced in 2009.

The previous *Fælles Mål* (published in 2004) for the subject *Knowledge of Christianity (Kristendomskundskab)* included one reference to a ‘value base’: the description of the common aims of the subject included the requirement that students should “understand the meaning of Christianity as a value base for our culture” (Danish Ministry of Education 2004, 11). This sentence was omitted from the new *Fælles Mål*.

As already noted, Christianity is regarded as an essential element in Danish culture. The Danish constitution enunciates an intimate relationship between the state and the Evangelical Lutheran church. This relationship has also had a great impact on RE. As noted in the previous chapter, until 1975 the Folkeskole and the Church of Denmark shared joint responsibility for Christian nurture. Since then the school's responsibility has been limited to imparting knowledge about Christianity; the role of Christianity in the Folkeskole is nevertheless still very prominent. (Monrad 2007, 49-50.) For example, between 1993 and 2006, the 'objectives' clause of the Education Act (the Folkeskole Act) prescribed that "[t]he Folkeskole shall familiarise the pupils with Danish culture (including Christianity) and contribute to their understanding of other cultures and man's interaction with nature" (cited in Monrad 2007, 49). Here Christianity was the only explicitly named example of Danish culture.

While the objectives clause was changed on August 2006, and Christianity is no longer explicitly mentioned, according to the Ministry of Education the Act still incorporates Christianity as a primary factor (Monrad 2007, 50).¹⁴

Desirable ethical attitude

The only reference to a desirable attitude in the Folkeskole Act is the sentence cited above ("The schools shall prepare pupils for participation, joint responsibility, rights and duties in a society based on freedom and democracy"). In 2002 the Danish Ministry of Education published a document entitled *Rights and Duties in the Danish Comprehensive Primary and Lower Secondary Schools (Rettigheder og pligter I folkeskolen)*, according to which the schools should teach pupils (i) to understand what the above sentence means; (ii) "to interact in a community based on intellectual freedom, equality and democracy"; (iii) "to become familiar with Danish culture"; and (iv) "to understand other cultures" (Danish Ministry of Education 2002, 5).

In the previous chapter I referred to *The Danish Democracy Canon*, published in 2008 by the government committee established for the purpose of drawing up a 'democracy canon' – a list of "key events, philosophical trends and political texts" that have contributed to the development of Danish democracy (Danish Ministry of Education 2008b, 8) – and by the Danish Ministry of Education. *The Danish Democracy Canon* is designed for schools to use in "strengthening knowledge of the principles of freedom and democracy on which Danish society is based" (Danish Ministry of Education 2008b, 8). In the foreword, Prime Minister Anders Fogh Rasmussen expresses his hope that

¹⁴ Monrad (2007) does not give any examples to substantiate this view.

the democracy canon will be used actively and dynamically in teaching, in associations, in liberal adult education, and everywhere in society to strengthen awareness, consciousness and discussion of the fundamental principles of democracy (Danish Ministry of Education 2008b, 5).

One of the main motives for drawing up these canons was to enable citizens to live peacefully in a multicultural society. In the chapter ‘The Present Conditions for Democracy – Four Challenges’ the first challenge on the list is “multiculturalism”.¹⁵ The document provides several solutions to this challenge. The primary solution, the “democratic solution” is “to put law before culture” (Danish Ministry of Education 2008b, 87):

Even though a democratic society allows people freedom to express their opinions and to choose their religion and ideology, it does not permit religion and ideology to supersede law. ... In this way restraints are put on fundamentalist groups, in the hope that many cultures can find their place next to each other. (Danish Ministry of Education 2008b, 88-89.)

[Democracy] allows freedom of choice regarding creed and way of life, but it obliges such choices to fit into a common system of order, so that politics triumphs over both religion and ideology (Danish Ministry of Education 2008b, 89).

What is interesting is that the phrase “to put law before culture” is in itself quite trivial. It is obvious that the law must be followed. The reason for listing this as the primary solution to the challenge of multiculturalism may be the fact that in some cases a child’s upbringing in the home is not in accordance with society’s values.

Another, equally evident aim of the document is to state that democracy cannot accommodate fundamentalism. Citizens should accept a common moral ground for peaceful interaction:

Democracy represents an attempt to foster civilised social interaction between different cultures that all contribute to a rich society. The American philosopher, John Rawls (1921-2002), believed that it required an area of overlapping consensus – an area of principles that everyone can agree on, despite disagreeing otherwise. (Danish Ministry of Education 2008b, 89.)

Also needed is an ability to make compromises:

A society with many cultures each nurturing its own Truth will be

¹⁵ Here the term obviously refers to a state of affairs, not to a political programme.

like a powder keg that easily explodes. Such an explosion can perhaps be prevented by physical force. Democracy employs another method. It seeks to create social order by spelling all truths with a small ‘t’. These truths can be discussed in public, and everyone can personally agree or disagree with them. A democratic election is not concerned with what is true and what is false, but with which views can gain majority support. All views have a right to be voiced and discussed; none are automatically wrong. (Danish Ministry of Education 2008b, 87-88.)

The obstacles in the way of this are close-minded citizens:

This [finding an area of principles that everyone can agree on] is still unacceptable for those who insist on having Truth with a capital ‘T’ on their side. (Danish Ministry of Education 2008b, 89.)

Although the ‘talk’ about truths in the above citations mainly refers to the political decision-making process, the document also takes a stance as to the epistemological nature of different value positions and ways of life:

[N]o ideological or religious Truth can prove itself true. If it had such proof, it would be a matter of knowledge, not faith. (Danish Ministry of Education 2008b, 89.)

Here the approach is similar to the Swedish one: knowledge is distinguished from belief.

Tolerance too is discussed in the document. It is regarded as a necessary characteristic of citizens: “The demand is for different cultures to tolerate each other, even when it hurts to do so” (Danish Ministry of Education 2008b, 89). But not everything should be tolerated:

tolerance is a self-contradictory concept, which in its radical form is also self-destructive. Showing tolerance towards those who are intolerant allows intolerance to run unchecked and thus undermines tolerance.

In sum, one could argue that in the *Democracy Canon* the main challenge to democracy in a multicultural society is (religious) faith that is in conflict with the values of that society. In this sense the *Democracy Canon* is in line with the ideas of the Danish government described in previous chapters. Cultural diversity should be accepted and tolerated within certain limits. Equality in cultural matters is a matter of non-discrimination, but not of cultural promotion or the protection of cultural rights.

Means and content of ethical reflection

In the Danish education system the only subject that is designed to enable pupils to develop their moral reflection is 'Knowledge of Christianity'. One of the four central areas of proficiency and skills covered by the subject is 'Philosophy of Life and Ethics' (Livsfilosofi og etik) (mentioned first on the list) (Danish Ministry of Education 2004, 10; see also Danish Ministry of Education 2009). The aim in this 'area' is to help students orient themselves in this world and find their own personal point of view in moral matters. According to the characterisation of the subject, the objective is to enable the student

to find their personal approach regarding fundamental life questions and ethical dilemmas, and to act accordingly (Danish Ministry of Education 2004, 10).

After nine years (in some cases ten years) of education, pupils are expected to have the ability to evaluate different ethical principles and to practice moral inference (Danish Ministry of Education 2004, 12; Danish Ministry of Education 2009, 4), and to understand how different norms and ethical principles are related to the values behind them (Danish Ministry of Education 2004, 16). Areas of ethical reflection are Christianity and non-Christian religions, as well as other views (or perceptions) of life (Danish Ministry of Education 2009, 4).

The question of the extent to which morality as a phenomenon is tied to religion remains open; the *Fælles Mål* (2004) does not offer any explication of this. However, one goal after the nine years of education is for the pupil to be "able to explain how the stories of the Bible are related to present-day values (Danish Ministry of Education 2004, 16). This suggests that the Bible, and the values of Christianity, form an important part of ethical reflection.

Summary and discussion

In this chapter I have explored various aspects of values education in Great Britain (England), the Netherlands, Sweden, and Denmark. The first area of interest concerned those values that are explicitly stated as the guiding principles of education. We can observe interesting differences in the strategies applied in these four countries. As indicated in previous chapters, in each country the need for citizens to assimilate the society's basic values is expressed quite clearly; the role of values in achieving cohesion is especially striking. In the documents issued to guide education, on the other hand, it is only in Sweden that the values of the society are presented in detail. Fundamental values are mentioned in the Education Act, the National Curriculum, and the Syllabuses. In England we saw that values are not that strongly expressed. The Education Act does not contain any value statements,

while the only reference in the National Curriculum is to four core values. Furthermore, these values are derived from an idea according to which all citizens share these in practice. Liberal values are not stressed, and for example gender equality is not mentioned at all. The Education Act of England does not refer to any values. This also applies to Denmark; important values are not explicitly referred to in the Education Act or in *Fælles Mål* for different subjects.

Another interesting finding is that in both Denmark and Sweden Christianity is mentioned as an important element in the society's value foundation. In this sense the definition of national identity also incorporates a religious element.¹⁶

With regard to the second aspect of values education, the desired ethical attitude, I have argued that in Sweden the goal of education is a citizen who has deeply internalised and assimilated the society's fundamental values. What this means is that the distinction between private and public values cannot be meaningfully maintained. In this sense, the interests of the state supersede for instance the desire of religious parents to inculcate illiberal values in their children.¹⁷ In the other countries this goal is not stated as clearly or strongly. Rather, students are expected to understand the importance of the society's basic values in enabling co-operation among citizens. In England, we find the declaration that "education provides opportunities to promote moral development through enhancing the values identified within the National Curriculum, particularly valuing diversity and engaging in issues of truth, justice and trust" (QCA & DfES 2004, 14). In the Netherlands the point is stressed that students need to acquire "respect for generally accepted standards and values" (Bron & al. 2007, 81) and "insight in important values and standards" (Bron & al. 2007, 80). In Denmark the *Democracy Canon* states that the law should take precedence over any cultural practice (Danish Ministry of Education 2008b, 87) and that democracy obliges different ways of living to fit into a common system of order "so that politics triumphs over both religion and ideology" (Danish Ministry of Education 2008b, 89).

What all four nations have in common is that the desired ethical attitude is essentially about possessing virtues that enable citizens to co-operate peacefully. In other words, after a successful education students would have the ability to tolerate or even empathise with others and their values. The key method in achieving this goal is giving students explicit knowledge about different ways of life. In some cases this may also entail a conflict of interests between the state and the parents. In the 1980s in the U.S. some

¹⁶ We may recall that in the beginning of this chapter I referred to the findings of MacNeill (2000, 351), according to which in the syllabi of Britain, Germany and France the definition of national identity incorporates a religious element.

¹⁷ In the next chapter I discuss the legitimacy of such an approach in the eyes of the international courts.

fundamentalist and evangelical families in a rural Tennessee school district wanted to withdraw their children from reading classes in grades one through eight because the children were exposed to a variety of religious points of view evenhandedly, thus refuting the idea of their own particular religious beliefs as an absolute truth. The parents also argued that the textbooks contained objectionable issues, such as women's liberation and evolution. (See Macedo 1995b, 470-471.) This kind of appeal on behalf of the parents would not be respected in any of the countries discussed here.

We have seen that in England teachers are required to present controversial issues and discuss them with pupils. According to the Education Act, pupils should be "offered a balanced presentation of opposing views". In Sweden a teacher is expected to "openly present and discuss different values, ideas and problems" (Swedish National Agency for Education 2006, 9). In the Netherlands and Denmark it is considered essential that pupils become acquainted with different ways of life; in Denmark, open discussion is a central approach to the treatment of moral matters.

A conflict of interest between the state and the parents may also occur because the aim of moral education is for students to become independent in moral matters: they are encouraged (1) to engage in individual moral thinking, (2) to act according to the outcome of this independent reflection. According to R.S. Downie, independent thinking consists of three essential factors. Firstly, "[w]e begin to be independent of other people in our thinking to the extent that we base our beliefs on *evidence* or *argument*, as distinct from the testimony and authority of others". Another factor that makes us independent-minded "is our ability to *understand* what we claim to have in our minds". This simply means that we understand the relevant concepts and background information about the things we are talking about. Thirdly, "we are independent-minded to the extent that we are *critical* of the evidence or arguments for a belief". (Downie 1988, 82-83; italics in original.)

This, of course, contradicts the idea of blind reliance on the testimony of an author, for example the Bible or the leader of religious community. I am not claiming that all religions are antithetical to the idea of critical thinking or all religions are favouring traditional sources of authority. However, as presented in Chapter 1, there are parents who want to shelter their children from alien influences, and it seems that Muslims in particular are afraid of losing their children to the dominant culture and see "fundamental discrepancies between the values of dominant culture presented by schools, and the values emanating from religious and cultural traditions of the family" (Sakaranaho 2006, 316). My point is that the governments' requirements put on pupils as future citizens trump these parental interests. The following normative statement by Macedo seem to be reality:

A liberal order does not and should not guarantee a level of playing

field for all the religions and ways of life that people might adopt and sincerely espouse. That some people have a hard time passing on their convictions to their children in circumstances of peaceful, liberal diversity is not anything to apologise or (necessarily) adjust for. (Macedo 1995a, 227.)

I have also been interested in exploring how morality as a phenomenon is tied to religion. Since RE is the subject where moral reflection is often systematically practiced, it was interesting to see to what extent moral reflection takes place through religious concepts. As a conclusion, it can be argued that religious values and examples serve as a starting point for the pupils' moral reflection; in the upper grades, however, the point of view is expanded in the direction of philosophy. In this sense, religious education, as a school subject with a long history of passing on specific religious values and ethos, has changed in a direction that serves the needs of pupils living in a plural society.

In summing up some of the strategic choices that protect the 'secular' from the impact of the 'religious', a few conclusions can be drawn. First of all, as I have shown, pupils are encouraged to be independent in moral matters. Different views of life are presented and discussed in the classroom, with the assumption that they may be seen as valid from one point of view but not necessarily from another. Thus the epistemic status of 'knowledge' concerning the norms and values promulgated by a particular view is considered relatively weak. In Sweden, the syllabus for RE states that "phenomena can be understood in different ways by different people, depending on, for example, gender, class and ethnic affiliation" (Swedish National Agency for Education 2008, 59). According to the *Democracy Canon* of Denmark, "no ideological or religious Truth can prove itself true" (Danish Ministry of Education 2008b, 89). In these cases 'knowledge' is monopolised as the property of a scientific procedure, based on the "Enlightenment-inspired secularist preoccupation with proof or evidence" to use the expression of Knott and Franks (2007, 24).

It should also be noted that 'knowledge' given to pupils concerning different ways of life is assumed to have a high extrinsic value. It is believed to be an important component in creating tolerant and respectful citizens. The underlying assumption is that knowledge is useful for this purpose only if it is correct and provided in an impartial and neutral manner. For example, in the previous chapter we saw that there is doubt as to the ability of faith schools to prepare pupils for life in a multicultural society. One cause of this doubt was the fact that the 'knowledge' given in these schools was not believed to meet these conditions.

What, then, are the consequences of all this? If pupils are encouraged and/or helped to develop critical intellectual skills with regard to the 'knowledge' provided by religions, even over one particular issue, they are

simultaneously enabled to diverge from thinking in terms of religion in general. We have seen that pupils are encouraged to approach issues related to religion with a scientific attitude. In this process the key words are 'knowledge', 'proof', 'evidence', 'discussion' and 'argumentation'. If the schools succeed in this aim, i.e. in implementing critical thinking in pupils, the 'public' or the 'secular' will be less easily exposed to what is seen as the ill effects of the 'religious'.

It is worth noting that in the schools of these four countries religion is regarded as a public matter, in the sense that issues relating to it are discussed openly. However, it is likely that everything that relates to this issue is treated more or less in scientific terms and using scientific language.

One more point needs to be made before ending this chapter. In this thesis I have argued that regardless of their cultural backgrounds, citizens are expected to become alike with regard to their attitudes towards the society's core values. In the 'Summary and discussion' section of Chapter 3 I argued that politicians seem to have a vision of a unified society with a strong 'centre', in which citizens are bound together by moral bonds and responsibilities. In this chapter we have seen that the schools play an important role, not in only in reaffirming the collective feelings and ideas that constitute the society's unity and its character but also in creating predictability and trust in citizens' behaviour with regard to values. It should be noted, however, that despite this tendency to underline the importance of the essential core of the society, its plural nature is strongly present in the documents. Thus the reaffirmation of the national 'personality' of Great Britain, the Netherlands, Sweden and Denmark is not only about passing on to pupils certain 'old' ideas about their nation's character, but also about recognising the new situation.

Chapter 6

Religious education in a multicultural society

Introduction

In this chapter I explore the recent debate over the appropriate content and organisation of religious education.¹ Underlying this issue are two questions: (i) what kind of religious education on the one hand treats all pupils equally, on the other respects the rights of parents (or legal guardians) and children; (ii) what is seen as the purpose of religious education in present-day Europe. With regard to the first question, we have already seen that in all of the four countries studied here, policies with regard to cultural plurality in values education are based on an interpretation of equality that can be called ‘difference-blind’; in other words, culturally defined identity does not legitimate any form of special treatment.

In a number of European countries religious education is the only subject where pupils are divided into separate classes according to their religious affiliation (or lack of any such) (see *Religious Education in Europe 2007*; *Religion and Education in Europe 2007*). Within this kind of arrangement we find both non-confessional approaches, as for example in Finland, and confessional ones, as for example in Spain and Greece. The obvious advantage of separating students according to their belonging (or not belonging) to a particular religious affiliation is that religious freedom, in this case the convictions of the pupils and/or their parents or legal guardians, are respected.²

Within Europe, however, there are also countries where all pupils attend the same non-confessional religious education classes. Among the countries explored in this thesis, three – namely Britain (England), Sweden and Denmark – have unified religious education within the public school system. This arrangement has been criticised: the content of religious education either (i) includes something that is seen as inappropriate from some point of view (inclusion complaint) or (ii) excludes something that from some point of view is considered of crucial importance (exclusion complaint).

¹ Since the main purpose of this chapter is to explore what kind of content international actors suggest for religious education, I do not separately analyse the religious education given in Great Britain, the Netherlands, Sweden and Denmark.

² By ‘conviction’ I mean not only theistic beliefs but also non-theistic and atheistic ones.

In the case of inclusion complaints, for instance, some religious groups, as well as parents who do not belong to any denomination, want to have a greater or even an exclusive say in matters concerning their children's religious instruction because the content deals with controversial issues.³ In the case of exclusion complaints, it is argued that this form of education does not – and cannot – accommodate diversity or adequately reflect the pluralistic nature of a modern society. According to one claim, the content of liberal democratic education excludes a large range of educational possibilities. Bonna Devora Haberman (1994), for instance, argues that one of the central areas of education should be dealing with substantive claims concerning the 'good life'. According to Haberman, democratic education provides insufficient content to enable the initiation of the children of certain religious groups into the culture endorsed by their parents:

[o]ften this life-style might only be achieved through very intense procedures of study and initiation, depending on how drastically it differs from the common norms and behaviours of the surrounding culture. The education required for this process of passing on traditional life-styles from one generation to another is by definition education in content, the content consisting in the specific worldview, customs, etc., of each tradition. It is this genus of education which makes pluralism meaningful. (Haberman 1994, 185.)

Another type of exclusion complaint is that used in Finland in the debate over the appropriate organisation of religious education, in connection with the proposed revision of legislation on religious freedom. According to this argument, pupils have a positive right to receive instruction according to their denominational affiliation; given a unified approach, this right cannot be guaranteed (see Seppo 2003).⁴

What these two types of exclusion complaints have in common is the idea that religious *identity* needs to be protected and/or cultivated. It may be asked under what conditions unified religious education respects the convictions of the pupils and of their parents or legal guardians. The issue of fair treatment, however, cannot be treated solely as a matter concerning the students and their parents alone; the state too has a legitimate interest in the content of education. Here we come to the second question set above: that concerning the purpose of religious education. As we have seen, nations set quite explicit standards as to what kind of citizens they want to have. The current political and ideological trend emphasises that all citizens should be

³ I return to this issue later in this chapter.

⁴ The starting point in the new law of religious freedom is to emphasise the pupils' positive right to receive education in one's own religion (Seppo 2003, 179; Uskonnonvapauslaki [Freedom of Religion Act] 2003).

open to religious and philosophical plurality. As I have also argued, religious education in the schools, along with citizenship education (or civic education) plays a significant role in achieving this openness and tolerant atmosphere, as well as providing knowledge about different ways of life. It is thus understandable that states have become more interested in the content of religious education. Faith schools have faced criticism and are under surveillance precisely because it is not believed that they can achieve this goal; even worse, they may inculcate in children an intolerant attitude towards their fellow-citizens.

If we look at the results of comparative studies in the field of religious education in Europe, we find considerable variation as to how the subject is organised and who is responsible for teaching it. Certain core trends can nevertheless be identified. One such trend is an increased openness to the religious and philosophical plurality of European societies. In those approaches that can be called non-confessional, non-religious options, for example atheism and secular humanism, have gained an equal footing with religious ones. The overall trend in non-confessional approaches is that the subject has moved in the direction of an ordinary, knowledge-based school subject. In the case of countries where the schools provide confessional religious instruction, one trend is that goals in this area have to be consistent with those set for schools in democratic and pluralistic societies. (Willaime 2007, 62-64.) In other words, the teaching of religion has to comprise “those religious expressions compatible with human rights and a democratic ordering of society” (Willaime 2007, 64).

However, as Jean-Paul Willaime (2007, 64) notes, what is characteristic of religious education, and especially of changes in its content or in how it is arranged, as well as possible changes in the future, is that “they raise tensions and engender conflicts”. These conflicts naturally arise when the interests of the state are inconsistent with those of some of its citizens. Such a conflict of interests is of course far more complex than the simple dichotomy outlined above, but fundamentally the issue comes down to a question of rights: what kind of content of religious education can a state legitimately impose in its curriculum, and what rights does it have in obligating pupils to attend religious education classes? On the other hand, to what degree can parents or legal guardians exercise their right to decide about their children’s education by appealing to their freedom of belief? In order to answer this question, in the following I evaluate the international legal framework with reference to the relevant cases that have created the framework for a legitimate content of religious education. I also find it useful to analyse what minimum requirements international actors have established for the content and organisation of religious education. The advantage of clarifying these issues is that these actors are free from the specific history of organising religious education and thus represent an independent point of view, but are simultaneously obligated to sustain to its utmost the principle of the fair

treatment of citizens. I return to this topic after describing and discussing the legal framework.

The United Nations and the Council of Europe: human rights in relation to the content of religious education

One of the most important and comprehensive treaties on human rights is the United Nations International Covenant on Civil and Political Rights (ICCPR), from 1966. This treaty is legally binding, in the sense that it has been ratified by three quarters of all states in the world. It protects a large part of the rights enshrined in the Universal Declaration of Human Rights from 1948, but also includes rights not mentioned in the Universal Declaration. The same is true of the International Covenant on Economic, Social and Cultural Rights (ICESCR), likewise from 1966. According to Martin Scheinin (2004, 189) these two covenants “represent a progressive development in the understanding of human rights”. Article 18 of the International Covenant on Civil and Political Rights protects freedom of thought, conscience, and religion as follows:

1. Everyone shall have the right to freedom of thought, conscience and religion. The right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private, to manifest his religion or belief in worship, observance, practice and teaching.
2. No one shall be subject to coercion which would impair his freedom to have or to adopt a religion or belief of his choice.
3. Freedom to manifest one’s own religion or beliefs may be subject only to such limitations as are prescribed by law and are necessary to protect public safety, order, health, or morals or the fundamental rights and freedom of others.
4. The State Parties to the present Covenant undertake to have respect for the liberty of parents and, when applicable, legal guardians to ensure the religious and moral education of their children in conformity with their own convictions. (United Nations 1966a.)

It is paragraph 4 that includes a special clause regarding religious education. In article 13(3) of the ICESCR, the rights of parents or legal guardians with regard to religious and moral education are expressed as follows:

The States Parties to the present Covenant undertake to have respect for the liberty of parents and, when applicable, legal guardians to choose for their children schools, other than those established by the public authorities, which conform to such minimum educational standards as may be laid down or approved by the State and to ensure the religious and moral education of their children in conformity with their own convictions. (United Nations 1966b.)

It is the idea of conformity with parents' or legal guardians' convictions that sets limits to the content of religious education. The main point is that the parents or guardians have the right to have their children educated consistently with their own convictions and values.

In 1993 the Human Rights Committee adopted a General Comment on article 18 of ICCPR (United Nations 1994). In this General Comment, the forms of religious education given within the public schools system are treated in more detail. The essential point is that the imparting of knowledge should not be regarded as a violation of parental rights:

Article 18.4 permits public school instruction in subjects such as the general history of religions and ethics if it is given in a neutral and objective way (United Nations 1994, par 6).

However, it is also stated that if public education “includes instruction in a particular religion or belief” that is “inconsistent with article 18.4”, the state must ensure that exemption from religious education classes is possible for those who do not adhere to this particular affiliation (United Nations 1994, par 6). In the *Toledo Guiding Principles on Teaching About Religion and Beliefs in Public Schools* the point is understood as follows:

[P]arents can object to the nature and content of the education and teaching given to their children where religious instruction is predicated upon, is intended to or has the effect of projecting the truth (or falsity) of a particular set of beliefs. In consequence, parents must have the right to withdraw their children from such forms of teaching. (OSCE 2007, 35.)

In the General Comment the concept of ‘conviction’ is also clarified:

Article 18 protects theistic, non-theistic and atheistic beliefs, as well as the right not to profess any religion or belief (United Nations 1994, par 2).

As Carolyn Evans (2008, 453) writes, “[t]hese rights have a number of implications for teaching in religiously plural classrooms”. While coercive powers are needed and are legitimate in some cases (for example homework, behaviour, even a dress code), “when it comes to issues of religion ... the coercive powers of the school are restrained and schools must ensure that education does not impair the student’s choice to ‘have or adopt’ a religion or belief of his or her choice.”

This is an interesting interpretation, since in the previous chapter I showed that education might indeed be corrosive to their beliefs since pupils are encouraged to be critical and make use of evidence in their moral reflection. The essential point is that this parental right is interpreted through

the frame of the fundamental principles of human rights; thus no complaint can be made against teaching that aims at enabling students to live according to these principles. One of these principles is tolerance. Ingvill Thorson Plesner (2004, 805) makes the point as follows:

If the pupils do not get any common religious education or knowledge about each other's beliefs and traditions, education may fail to secure a foundation for tolerance and the development of a global and interreligious solidarity.

It is also worth noting that Article 29(1) of the Convention on the Rights of the Child (1989) leaves room for states to impose their central values. The article calls for the education of the child to be directed to the following goals:

(b) The development of respect for human rights and fundamental freedoms, and for the principles enshrined in the Charter of the United Nations;

(c) The development of respect for the child's parents, his or her own cultural identity, language and values, for *the national values of the country in which the child is living*, the country from which he or she may originate, and for civilizations different from his or her own;

(d) *The preparation of the child for responsible life in a free society, in the spirit of understanding, peace, tolerance, equality of sexes, and friendship among all peoples, ethnic, national and religious groups and persons of indigenous origin.* (United Nations 1989; italics added.)

The same point is made in the ICESCR:

The States Parties to the present Covenant ... agree that education shall enable all persons to participate effectively in a free society, promote understanding, tolerance and friendship among all nations and all racial, ethnic or religious groups, and further the activities of the United Nations for the maintenance of peace. (United Nations 1966b, par 13.1.)

In the European Convention on Human Rights (1950) enacted by the Council of Europe, religious freedom is protected by Article 9:

Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief, in worship, teaching, practice and observance (Council of Europe 1950, art 9.1).

The content is essentially the same as that of Article 18 of the ICCPR. The limitation clause states that

Freedom to manifest one's religion or beliefs shall be subject only to such limitations as are prescribed by law and are necessary in a democratic society in the interests of public safety, for the protection of public order, health or morals, or the protection of the rights and freedoms of others (Council of Europe 1950, art 9.2).

Educational rights are treated in Protocol No. 1:

No person shall be denied the right to education. In the exercise of any functions which it assumes in relation to education and to teaching, the State shall respect the right of parents to ensure such education and teaching in conformity with their own religions and philosophical convictions. (Council of Europe 1950, Article 2 of Protocol No. 1.)

Application of the principles of human rights to legal issues

In this section I present legal issues that have been raised before the United Nations Human Rights Committee and the European Court of Human Rights. My purpose is to find out what kind of content of religious education is considered to be in accordance with the Human Rights principles described in the previous section. With regard to the European Court of Human Rights I focus on four cases; all four were brought by parents who objected to the fact that the alternative of exemption of the child from the class was either not available or was too limited, even when the content of religious education violated their own or their child's freedom of religion. In other words, the education offered included something that parents regarded as inappropriate.

United Nations Human Rights Committee

For the purpose of this thesis, one important case is *Leirvåg versus Norway* dealt with by the UN Human Rights Committee (hereafter referred to as UNHRC) in 2004. The case was essentially about whether the subject entitled "Christian Knowledge and Religious and Ethical Education" (CKREE),⁵ which is compulsory in Norwegian schools (with only limited possibility of

⁵ In August 1997 the Norwegian government introduced CKREE as a new and mandatory religious subject in the Norwegian school system; it replaced the previous Christianity subject and life stance subject. The new subject provides for exemption only from certain limited segments of the teaching. (UNHRC 2004, par 2.3.)

See e.g. Hagesæther & Sandsmark (2006) for further information on the public debate over the implementation of CKREE.

exemption), violated the right of parents to secure the religious and moral education of their children in conformity with their own convictions (UNHRC 2004, par 14.2).

The applicants (parents of school-aged children and members of the Norwegian Humanist Association) complained that the subject focused on Christianity in such a way that a neutral and objective approach could not be guaranteed. They claimed, for example, that their “children are immersed deeply into the stories contained in the Bible as a framework around their own perception of reality” (UNHRC 2004, par 3.2).

The Committee’s decision was based on ICCPR article 18.4. It argued that education was not imparted in a “neutral and objective way”, even though the Education Act of Norway stipulates that “[t]eaching of the different topics shall be founded on the same educational principles”. The decision was based mainly on two arguments. First, CKREE was not considered a neutral subject since the object clause of the Education Act states that the object of “education shall be in agreement and cooperation with the home, to help to give pupils a Christian and moral upbringing.”⁶ According to the Committee, this makes “it clear that the subject gives priority to tenets of Christianity over other religions and philosophies of life”. (UNHRC 2004, par 14.3.) Secondly, the Committee was of the opinion that the subject also included activities that “may be perceived as being of a religious nature” (UNHRC 2004, par 14.3), since it included practices such as “learning by heart of prayers, declarations of faith and religious texts, singing of religious hymns, attendance of religious service, excursions to churches, production of religious illustrations, active or passive roles in religious dramatizations, and receiving holy scripts as gifts and taking part in events in this context” (UNHRC 2004, par 9.18).

Although a possibility for partial exemption was granted, the Committee found that the system did not protect the parents’ right to ensure that the religious and ethical teachings were in accordance with their beliefs:

[E]ven in the abstract, the present system of partial exemption imposes a considerable burden on persons in the position of the authors, insofar as it requires them to acquaint themselves with those aspects of the subject which are clearly of a religious nature, as well as with other aspects, with a view to determining which of the other aspects they may feel a need to seek – and justify – exemption from (UNHRC 2004, par 14.6).

⁶ This clause of the Education Act was amended in 2010. The new wording goes as follows: “Education and training shall be based on fundamental values in Christian and humanist heritage and traditions, such as respect for human dignity and nature, on intellectual freedom, charity, forgiveness, equality and solidarity, values that also appear in different religions and beliefs and are rooted in human rights.” (Regjeringen 2010, Chapter 1, Section 1-1.)

The Committee's conclusion was that the system of exemption needs to be revised and that "[t]he State party is under an obligation to avoid similar violations in the future" (UNHRC 2004, 16).

European Court of Human Rights setting the criteria for appropriate content of religious and values education

In 1976 the European Court of Human Rights (hereafter ECHR) issued its decision on *Kjeldsen, Busk Madsen and Pedersen versus Denmark*, in which three Danish couples had objected to the fact that their children had to take part in sex education classes which were "contrary to the beliefs they hold as Christian parents" (ECHR 1976, par 44).⁷ According to the parents, the arrangement whereby sexual education was made compulsory was in violation of their parental rights as expressed in Article 2 of the Protocol No 1 of the European Convention on Human Rights (ECHR 1976, par 44).

The Court decided that obligatory sex education was not in violation of the parental right. While it acknowledged parental rights,⁸ the Court made it clear that the state too has a legitimate interest in education and should have the opportunity to convey information or knowledge. The Court pointed out that many subjects taught at school have "some philosophical complexion or implications". (ECHR 1976, par 5.)

The Court also declared, however, that the state has the obligation to make sure that "information or knowledge included in the curriculum is conveyed in an objective, critical and pluralistic manner", and distinguished between the conveying of information versus indoctrination (ECHR 1976, par 53).

It is important to note that in the case of ways in which information is to be given, objectivity is not regarded as a sufficient condition. Various positions should also be introduced, in a pluralistic and critical manner. Looking at it the other way around, we can see that the emphasis is on the pupils' right to gain knowledge in a way that encourages their own reflection on the reliability of the different positions presented. In this sense, pupils are not regarded as extensions of their parents.

The Court also discussed what kind of moral and value statements a

⁷ While this case is not about what kind of content is appropriate in religious education classes, I find it worth presenting because the case is fundamentally about the extent to which parents have a say with regard to the content of their children's education.

⁸ The point is stated as follows: "Accordingly, the two sentences of Article 2 (P1-2) must be read not only in the light of each other but also, in particular, of Articles 8, 9 and 10 ... of the Convention which proclaim the right of everyone, including parents and children, 'to respect for his private and family life', to 'freedom of thought, conscience and religion', and to 'freedom ... to receive and impart information and ideas'" (ECHR 1976, par 52).

teacher can legitimately make.⁹ It noted that although the overall aim of sex education is to give students better information, there is the possibility that teachers may violate parental rights, since “appraisals of fact easily lead on to value-judgments” (ECHR 1976, par 54). The Court argued that if teachers try to warn pupils for example about “the excessive frequency of births out of wedlock, induced abortions and venereal diseases”, it is clear that “[t]hese considerations are indeed of a moral order”. However, the Court’s opinion was that even though the above examples easily fall under the rubric of moral statement, they are “very general in character and do not entail overstepping the bounds of what a democratic State may regard as the public interest”. According to the Court, the school fulfils its function by giving knowledge to enable students eventually “to take care of themselves” (ECHR 1976, par 54).

Thus here again the interests of the child are not equated to those of their parents. Rather, the society is seen as having an interest in protecting the child’s rights, to ensure that they receive the necessary capacities – in this case information – to live a good life.

In *Lena and Anna-Nina Angeleni versus Sweden* No. 10491/83, the ECHR considered whether the state has the right to introduce one particular religious way of life in more depth than another in religious education classes. In the case, a mother and a daughter, whose life values were non-Christian, claimed that their freedom of thought was being violated since the daughter was obliged to take part in religious education classes and thus was exposed to the Christian way of thinking (ECHR 1983, par 46).

In its decision, the Court made it clear that “[i]n principle, teaching which provides information only cannot be regarded as being in conflict with the Convention or its Protocols”, and that

The fact that the instruction in religious knowledge focuses on Christianity at junior level at school does not mean that the second applicant [the daughter] has been under religious indoctrination in breach of Article 9 of the Convention (ECHR 1983, par 49).

The possibility of focusing on one religion more than another is also treated in the case *Folgerø and others versus Norway* (2007). The case is essentially the same as that of *Leirvåg v. Norway* dealt with by the UNHRC.¹⁰ In this case the ECHR held that the interests of the parents and their child cannot be equated. Children have the right to have knowledge about other ways of life, and parents do not have the right to keep their child “ignorant about religion

⁹ Scholars who have analysed the Court’s decisions in the light of what rights parents can legitimately claim seem to have ignored this important issue.

¹⁰ After the Norwegian Supreme Court rejected the claims of parents attempting to get an exemption from participation in CKREE, some of the parents appealed to the UN Human Rights Committee while others turned to the European Court of Human Rights.

and philosophy in their education.” Furthermore, according to the Court, even though knowledge about Christianity has a greater part than knowledge about other religions and philosophies, the curriculum does not violate the principles of pluralism and objectivity. Reference is made to the case of *Lena and Anna-Nina Angelini versus Sweden*. (ECHR 2007a, 89.)

Interestingly, in the same year the Court seems to have taken a step further with regard to the question of how the interests of a child are to be interpreted. In the case of *Zengin versus Turkey* (2007), a father and his daughter attempted to obtain an exemption from a compulsory course in religious culture and ethics, which they claimed was incompatible with the right to freedom of religion or belief, with the parental right to guide the education of their children, and with the principle of secularism under the Turkish constitution. The Court’s opinion was that education should encourage pupils to be autonomous and independent, including the field of religion or belief:

the State, in fulfilling the functions assumed by it with regard to education and teaching, must take care that information or knowledge included in the curriculum is conveyed in an objective, critical and pluralistic manner, *enabling pupils to develop a critical mind with regard to religion* (see, in particular, paragraph 14 of Recommendation 1720 (2005) ...) in a calm atmosphere which is free of any misplaced proselytism (ECHR 2007b, par 52; italics added).

Furthermore, the Court pointed out that one important object for schools is the “development and moulding of the character and mental powers of its pupils as well as their personal independence” (ECHR 2007b, par 55). One precondition for this is that pupils are openly introduced to various life stances:

[I]n a democratic society, only pluralism in education *enables pupils to develop a critical mind* with regards to religious matters in the context of freedom of thought, conscience and religion. (ECHR 2007b, par 69; italics added.)

It is interesting that in this case the Court refers to the Council of Europe’s Recommendation 1720 (ECHR 2007b, par 52) since the Recommendation is in no way legally binding. The point seems to be that the Court interprets society’s interests through the lens of quite a recent development as to how to achieve a more tolerant and peaceful society. Part of this development is to establish new aims and standards for religious education. The Recommendation emphasises that pupils need to be given information about different life stances (Council of Europe 2005c, par 14.1) and to be provided with “educational tools”, so that they will not be influenced by “supporters of fanatical religious practice” (Council of Europe 2005c, 14.3).

The above serves as an illuminating example of how the boundaries between the public domain and the private one are constantly being redrawn. In this case the European Court of Human Rights defends the central secularist principle of demanding proof or evidence. In the previous chapter I showed that in England, the Netherlands, Sweden, and Denmark public education aims at enabling pupils to be independent, for example with regard to moral matters. The Court seems to have taken a step further. According to the ECHR, the State “*must take care*” (ECHR 2007b, par 52; italics added) that religious matters are discussed in such a way that pupils may develop a “critical mind with regard to religious matters” (ECHR 2007b, par 69). It can thus be said that the public sphere, representing non-religious ideas, penetrates into the private one in the sense that the ability to be critical is promoted in schools regardless of parental convictions or desires in this respect. Furthermore, if pupils are encouraged and/or helped to develop a critical mind with regard to the ‘knowledge’ provided by religions even on one particular issue, they are simultaneously enabled to see the epistemic status of the ‘facts’ provided by religions as weak in general. It should also be noted that critical thinking is a central component of (secular) science.

To sum up the above: we can say, first of all, that education that includes worship or other religious practices is inconsistent with the principles of plurality, neutrality and objectivity, unless the possibility of exemption is provided, and that in a non-discriminatory manner. One important point is, however, that this in itself does not entitle a pupil to be fully exempted from religious education classes. Rather, it is considered that partial exemption is enough if the content is otherwise in accordance with the above-mentioned principles.

Under what circumstances, then, can the content of education be said to be in accordance with the principles of neutrality, objectivity and plurality? It is important to note that the decisions arrived at in the above cases are based on the explicitly stated aims of education, and of religious education in particular, rather than on the content of education. In *Leirvåg versus Norway* the UNHRC decided that education was not neutral because according to the Education Act the object of education is to give pupils a Christian and moral upbringing. In *Folgerø and others versus Norway* the ECHR noted quantitative and qualitative differences in teaching Christianity and other religions or philosophies, and concluded that this made a uniform pedagogical approach, as mentioned in the Education Act, impossible (ECHR 2007a, par 95). This decision is based on the wordings of the Education Act:

In this regard, reference should be made to the stated aim in section 2-4 (1) of the Education Act 1998 to “transmit thorough knowledge of the Bible and Christianity in the form of cultural heritage and the Evangelical-Lutheran Faith”. In contrast, no requirement of thoroughness applied to the knowledge to be transmitted about other

religions and philosophies. (ECHR 2007a, par 92.)

In this case reference was also made to the curriculum, in which “half of the items listed referred to Christianity alone” (ECHR 2007a, par 89). However, the Court did not regard this as problematic, since it considered that in principle the state has a margin of discretion in defining a curriculum in conformity with its long tradition:

The fact that knowledge about Christianity represented a greater part of the Curriculum for primary and lower secondary schools than knowledge about other religions and philosophies *cannot, in the Court’s opinion, of its own be viewed* as a departure from the principles of pluralism and objectivity amounting to indoctrination (ECHR 2007a, par 89, italics added).

In *Angeleni versus Sweden* the ECHR decided that compulsory religious education did not violate parental rights. The Court based its view on the Compulsory School Curriculum (1980), according to which education was intended to be objective. Similarly in *Kjeldsen versus Denmark*, according to the Court, the documents that guide teaching show that the aim of sex education is to help pupils avoid certain problems in their future life. Finally, the interpretation of the Court in *Zengin versus Turkey* was that the intentions laid down in the syllabus for religious education “are clearly compatible with the principles of pluralism and objectivity” (ECHR 2007b, par 59).

Appropriate content and organisation of religious education seen by the eyes of United Nations and the Council of Europe

In 1994 the Commission for Human Rights of the United Nations assigned a task to Special Rapporteur Mr. Abdelfattah Amor: to examine the role of education in the promotion of tolerance, and to find ways in which education could contribute effectively to the fostering of tolerance.¹¹ The Special Rapporteur conducted a survey to find out whether religious education, as a school subject at the primary and secondary school levels in different countries, contributes to a climate of tolerance and non-discrimination. The survey was based on a questionnaire which was sent to all UN member states; 77 countries responded. The answers were analysed and summarised, and the results were reported to the Commission on Human Rights at its Assembly in Geneva in 2001.

One conclusion in Mr. Amor’s report is that there is “considerable variety in the approaches taken with regard to education in the field of religion and conviction” (Amor 2001, par 14). He criticised the fact that in

¹¹ Commission on Human Rights Resolution 1994/18, February 25, 1994.

many countries there is a 'ghetto approach', "based on exclusion" (Amor 2001, par 14); by 'ghetto approach' he is referring to religious education that provides knowledge mainly about one particular religion, thus failing to serve the aim of tolerance and non-discrimination: "There is a need to get rid of the dichotomy 'us' and 'them' in a sense that all are members of mankind" and there is an urgent need to develop in students "self-awareness in such a way that the 'others' are indeed us" (Amor 2001, par 22).

Thus Amor called for an education that develops the child's self-understanding and understanding of others. Religious education lessons should be organised in such a way that students are kept together. This arrangement is what he calls an 'integration approach'; it "would undoubtedly contribute to the development of a logic of integration and reiterate that the condition of mankind is One, despite its multiple representations" (Amor 2001, par 17). Amor argues that this kind of approach differs radically from theological instruction, which aims at getting acquainted with the basics of only one religious belief (Amor 2001, par 3).

This all suggests that Amor sees religious education as having a potentially high extrinsic value in promoting tolerance among students and increasing their understanding of different world views, and that this opportunity should be made use of.

In recent years the Council of Europe has shown a strong interest in religious education in Europe. Before going into details of its views as to the appropriate content of religious education, it is worth exploring the Council's reactions to religion as a phenomenon in general. First, the Council sees religion as one possible source of conflict among citizens:

There is a religious aspect to many of the problems that contemporary societies faces, such as intolerant fundamentalist movements and terrorist acts, racism and xenophobia, and ethnic conflicts (Council of Europe 1999, par 3; 2005c, par 2).

This same view is also presented by Álvaro Gil-Robles, Commissioner for Human Rights of the Council of Europe from 1999 to 2006. In 2003 he stated that many of the crisis situations that he has encountered have been deeply rooted in cultural and religious tensions (Council of Europe 2005d, par 7). From this it should not be concluded, however, that it is religion itself that creates problems. Rather the point is that "[m]any tensions are the result of mutual ignorance and lack of respect" (Council of Europe 2005d, par 40).

Secondly, the Council of Europe recognises that a significant change has taken place in the ways that religions and religious issues are present and represented in Europe. Along with secularisation, Europe has also witnessed "the growing strength of the Muslim communities" (Council of Europe 2007c, 6), and it is undeniable that "religion has, in recent years, again

become a central issue of debate in our societies” (Council of Europe 2007c, par 7).

Thirdly, the Council of Europe’s view is that “religion is an important feature of European society” (Council of Europe 2007c, par 1), and needs to be welcomed and respected in all its plurality (Council of Europe 2007c, par 3). It is also recognised that religions have made important contributions to the evolution of human thought:

Religions have contributed as much to the creation of a *humanist* morality as to a religious one and, in Europe, secular codes of social conduct and secular moral attitudes owe much to the Judeo-Christian tradition (Council of Europe 2007d, par 66; italics in original).

The Assembly observes moreover that the three monotheistic religions of the Book have common origins (Abraham) and share many values with other religions, and that *the values upheld by the Council of Europe stem from these values* (Council of Europe 2005c, par 12; italics added).

In this sense, religions may have a lot to give to European societies. It is argued that religions may play a highly beneficial social role, for example in eliminating “much of what breeds religious extremism” (Council of Europe 2007c, par 10). It is acknowledged that “religion, through its moral and ethical commitment, the values it upholds, its critical approach and its cultural expression, can be a valid partner of democratic society” (Council of Europe 1999, par 5). However, strict limits are set for what kind of influence different religions can have on citizens. First, religious values cannot contradict core European values:

[I]n no circumstances can the rights of others or the collective rights of communities be limited in the name of a particular belief-system; and if there is ever a conflict between human rights and the dictates of faith, the State must always defend human rights (Council of Europe 2007d, par 68).

Secondly, religious influence in public is limited:

This danger of a drift beyond the perfectly proper interest of faith-communities *as citizens* in the activities of their governments, in accordance with democratic principles, towards religious interference in what should be purely secular matters is a danger that should be resisted (Council of Europe 2007d, par 66; italics in original).

The above can be viewed as a definition of the ‘appropriate’ place of religion in European societies. The point is that not only may religions enter into the public sphere, but that their voice is in fact welcomed. This is the case,

however, only under certain conditions and in certain matters. First of all, an essential condition is that religions need to be committed to the values upheld by the Council of Europe. In addition, the Council makes it very clear that secular matters are no place for religious interference (Council of Europe 2007d, par 66). One area where the voice of religions is welcome is that of values; they are able to promote the principles of human rights. It is worth noting that the Council speaks of “secular moral attitudes” (Council of Europe 2007d, 66), whose roots are in the Judeo-Christian tradition (Council of Europe 2005c, par 12). It seems to be the case that something that was originally religious by nature has become something entirely secular.

In addition to promoting important values, in the eyes of the Council, religions can also be ‘beneficial’ in helping the civil authorities to combat religious extremism (Council of Europe 2007c, par 10).

In sum: it can be said that religion is regarded as a phenomenon in which desirable qualities can be distinguished from undesirable ones. A religion is regarded as a legitimate partner of a democratic society only with respect to its desirable qualities.

Now let us move on to the Council’s views on religious education. As indicated in Chapter 4, the Council considers that in order to avoid the problems created by religions there is a need for intercultural dialogue, and that the religious dimension is very important in this dialogue (see e.g. Council of Europe 2007c).¹² The role of education is seen as vital in this effort. The Council also considers that the way to reach a more tolerant society is by giving information to *all* pupils about different beliefs. The first reference to the importance of giving information was in the Council’s Recommendation 1202 (1993), ‘On religious tolerance in a democratic society’. Interestingly, this recommendation stresses the need to understand one’s own religion and its ethical principles; this is seen as a prerequisite for true tolerance, as well as acting as a safeguard against indifference or prejudice (Council of Europe 1993, par 16 iv). Knowledge about other religions or beliefs is also regarded as important, and it is recommended that students achieve “a better and deeper understanding of the various religions” (Council of Europe 1993, par 16 iii).

Six years later, in 1999, the emphasis has clearly shifted from learning about one’s own religion to stressing the importance of gaining knowledge about other religions. As a matter of fact, the idea of getting to know the basic principles of one’s own religion no longer occurs in the Council’s documents. What is now stated is that school curricula should “promote better understanding of the various religions” and that “religious instruction

¹² See e.g. Council of Europe (2007c, par 8): “The Assembly recognises the importance of intercultural dialogue and its religious dimension and is willing to help devise a comprehensive Council of Europe strategy in this area.”

should not be given at the expense of lessons about religions as an essential part of the history, culture and philosophy of humankind” (Council of Europe 1999, par 10).

It is also recommended that the Committee of Ministers invite the governments of the member states to

promote education about religions and, in particular, to step up the teaching about religions as sets of values towards which young people must develop a discerning approach, within the framework of education on ethics and democratic citizenship (Council of Europe 1999, 13 ii a)

[and to]

promote the teaching in schools of the comparative history of different religions, stressing their origins, the similarities in some of their values and the diversity of their customs, traditions, festivals, and so on (Council of Europe 1999, 13 ii b).

In Recommendation 1720 ‘Education and religion’ (2005), we find a connection between pupils’ gaining knowledge about different religions and a healthy democracy. The Council argues that “a good general knowledge of religions and the resulting sense of tolerance are essential to the exercise of democratic citizenship” (Council of Europe 2005c, par 1), and that “young people lack the necessary bearings fully to apprehend the societies in which they live and others with which they are confronted” (Council of Europe 2005c, par 3). One reason for this is the distorted perception, for example of Islam, given by the media (Council of Europe 2005c, par 4).

A further change compared to the past is that a critical attitude should be developed in pupils:

School is a major component of education, of forming a critical spirit in future citizens and therefore of intercultural dialogue. It lays the foundations for tolerant behavior, founded on respect for the dignity of each human being. By teaching children the history and philosophy of the main religions with restraint and objectivity and with respect for the values of the European Convention on Human Rights, it will effectively combat fanaticism. Understanding the history of political conflicts in the name of religion is essential. (Council of Europe 2005c, par 7.)

What is interesting here is that a critical spirit is seen as a prerequisite for intercultural dialogue, increased tolerance and the ability to combat fanaticism.

The Council also criticises some countries because they are “not devoting enough resources to teaching about religions” (Council of Europe 2005c, par 9), and observes that in Europe in general there is a shortage of

teachers qualified to give comparative instruction in different religions (Council of Europe 2005c, 10).

In sum, we can say that in the Council's opinion a proper religious education requires that pupils are given knowledge about different beliefs in a comparative manner and in a way that encourages their independent and critical thinking. The Parliamentary Assembly encourages the Committee of Ministers to ensure that every nation adopts this form of religious studies in all primary and secondary schools (Council of Europe 2005c, par 13-14).

In 2007 the Council of Europe issued Resolution 1580, 'The dangers of creationism in education'. According to the Resolution, the Parliamentary Assembly is concerned about "the possible ill-effects of the spread of creationist ideas within our education systems and about the consequences for our democracies" (Council of Europe 2007a, par 2). The Assembly points out that "[t]he prime target of present-day creationists ... is education" (Council of Europe 2007a, par 4), and wants to ban creationism from all schools.

In the Resolution, the parents' right to choose a suitable content for their children's education is challenged by two arguments. First of all, students' minds are to be protected from a distorted view about the reality:

There is a real risk of serious confusion being introduced into our children's minds between what has to do with convictions, beliefs, ideals of all sorts and what has to do with science. An "all things are equal" attitude may seem appealing and tolerant, but is in fact dangerous. (Council of Europe 2007a, par 7.)

Secondly, there are high public stakes involved. Banning creationism is linked to maintaining a healthy democracy:

The teaching of all phenomena concerning evolution as a fundamental scientific theory is therefore crucial to the future of our societies and our democracies. For that reason it must occupy a central position in the curriculums, and especially in the science syllabuses, as long as, like any other theory, it is able to stand up to thorough scientific scrutiny. (Council of Europe 2007a, par 15.)

What is at stake here is made explicit in the Parliamentary Assembly's Report (Doc. 11375) that preceded this Resolution:

By denying proven facts, the creationist ideas do not contribute to the transformation of societies but to making them become archaic. *The creationists are in fact supporters of a radical return to the past, which could prove particularly harmful in the long term for all our societies. This is therefore a crucial issue.* (Council of Europe 2007b, par 81; italics in original.)

The point is that society should be protected from close-minded citizens who are not willing to weigh the evidence but rather rely on the authority of religious leaders. Thus “it is necessary to prevent belief from opposing science” (Council of Europe 2007b, par 1).

The Parliamentary Assembly, therefore, urges the member states and especially their education authorities to:

- 19.1. defend and promote scientific knowledge;
- 19.2. strengthen the teaching of the foundations of science, its history, its epistemology and its methods alongside the teaching of objective scientific knowledge;
- 19.4. firmly oppose the teaching of creationism as a scientific discipline on an equal footing with the theory of evolution and in general the presentation of creationist ideas in any discipline other than religion;
- 19.5. promote the teaching of evolution as a fundamental scientific theory in the school curricula. (Council of Europe 2007a.)

The point of view expressed by the Council of Europe is an example of how secular ideals are protected from unwanted effects exerted by the ‘religious’; more precisely, by the information that some religions provide. In this case, ‘scientific knowledge’, representing the secular or non-religious sphere, is contrasted to religious belief; the latter represents something that is not only imprecise but that is categorically wrong with regard to the question of the origin of the world. In other words, science holds a monopoly, as the only ‘camp’ that can produce valid knowledge at least in this matter. This stance is non-negotiable. It is thus not an exaggeration to state that in the eyes of the Council of Europe, banning creationism is a ‘sacred concern’.

The view of the Council also allows us to draw conclusions as to the epistemic requirements underlying the argumentation involved in the democratic decision-making process. The Council considers that “scientific theory is ... crucial to the future of our societies and our democracies” (Council of Europe 2007a, par 14) and that “[s]cience *is a prominent player and plays a big and active role in this process of the evolution and transformation of societies*” (Council of Europe 2007b, par 80; italics in original).

This can be understood to mean that the citizens’ willingness to accept the outcome of science, i.e. facts, is seen as a necessary condition for the existence of a healthy democracy. Thus, if for example religious citizens want to further their cause successfully, they are ‘forced’ to enter the secular arena, where an appeal to a ‘moral ought’ dictated by a supernatural entity is not regarded as a valid claim. All citizens are expected to use ‘secular language’ by which I mean that they need to use arguments to which all persons have equal access. The underlying idea that rational citizens will accept arguments that are grounded in proven facts.

Another important point is that according to the Resolution children are in need of protection from the possible ill-effects of an upbringing that aims at inducing them to believe in creationism or to adopt the position that there are many equally valid points of view: “[A]dopting a denialist stance on scientifically proven theories constitutes a brake on education and the intellectual and personal development of thousands of children” (Council of Europe 2007b, par 80). In this sense, creationism, representing a religious way of thinking, is treated with a relatively hostile attitude.

It is also worth noting that in the view of the Council, at least in this particular matter, the schools should represent solely the secular ‘camp’. Looking at this from another angle, the schools are expected to encourage their pupils to be critical with regard to religions’ ability to provide knowledge.

In 1999 the Council of Europe appointed Álvaro Gil-Robles as Commissioner for Human Rights. In 2000 Gil-Robles started a series of dialogues with representatives of religious communities, to examine the contribution that religions can make to the maintaining of a democratic state that respects the rule of law and fundamental freedoms. The results of these dialogues are presented in the document ‘Dialogue of the Council of Europe Commissioner for Human Rights with the religious communities’ (2004).

The fourth seminar, held in Malta in 2004, was titled ‘Religion and education: The possibility of developing tolerance through the teaching of religious facts’. Already in the previous seminar at Louvain-La-Neuve, the participants saw a need to “establish a specific training centre in which a methodology for integrating human rights principles into religious education, and for integrating the religious dimension into general education, could be developed” (Gil-Robles 2004, 42, par 6). One purpose of the Malta seminar was to discuss the possibility of creating a common programme for religious education.

The discussion at the seminar focused primarily on how religious education can contribute to the promotion of awareness of cultural heritage, “in which religions play an integral part”, and to the promotion of tolerance in post-modern societies (Gil-Robles 2004, 58). The former goal was regarded as important because, according to the participants, there is a lack of awareness of the cultural heritage in European societies. The participants were especially concerned about the fact “that religious institutions have ceased to transmit their religious cultures to new generations”. They agreed that the prime place for cultural revitalisation is the school. It was also recognised that it is impossible to combine “the individual histories of religions in a single unified approach”, since “national and traditional components remain central to the re-appropriation of our religious heritages”. (Gil-Robles 2004, 58.) However, despite this the participants considered that knowledge about ‘others’ must be an essential part of religious education:

[I]t is incumbent on schools, whether public or private, to include other aspects of religious cultures in its teaching, such as their history, ethics, philosophy, artistic manifestations, literature and forms of social organisation. Such subjects will contribute to an understanding of religious beliefs as they are subjectively experienced by their congregations.

With regard to the question of other minimum requirements as to the content of religious education, the conclusion of the seminar was that “the universal values and wisdom inherent in each religion” should be presented. This was seen as a prerequisite for “a common ground for dialogue between different religions, respecting, and in harmony with, human rights”. (Gil-Robles 2004, 59.)

In sum, the participants shared the same ideas as the Council of Europe: (i) that human rights must be taught, as basic values, and (ii) that students need to gain knowledge about other ways of life, as a prerequisite for dialogue among citizens and for a more tolerant society. The participants also shared the view of the Council of Europe and of Mr. Abdelfattah Amor, representing the United Nations, that religious education can, and perhaps should, be arranged in such a way as to integrate all pupils in the same religious education classes.

Concluding remarks

As the legal cases presented and discussed above show, it is legitimate to organise religious education as an integrated approach, on condition that the information is presented in an objective and neutral manner. With regard to the dimension of values, the state has the right to instil in pupils its own values. Problems arise when a state tries, within this kind of approach, to impose its own religious heritage too heavily on students. The two legal cases against Norway serve as illuminating examples of this.

Three of the four countries that I have been focusing on in this thesis, namely Great Britain (England), Sweden, and Denmark, have integrated non-confessional religious education. In all three countries, a significant weighting is given to Christianity.¹³ In England and Denmark the pupil’s right to full exemption is protected by law,¹⁴ while in Sweden only partial

¹³ It is worth noting that in Denmark the name of the subject is ‘Knowledge of Christianity’ (Kristendomskundskab).

¹⁴ The Education Act (1996) in the UK permits “students at the request of their parents, to be wholly or partly exempted from the religious education” (section 389). In Denmark the Folkeskole Act states that “[i]f requested, a child shall be exempted from participation in the instruction in the subject of Christian studies, when the person who has custody of the child submits a written declaration to the head teacher of the school to the effect that

exemption is possible. This gives cause to ask: in what respect does religious education in Sweden differ from that in Norway, which has been seen as violating parental freedoms?

Bjørn Gudem and Berit Karseth (1998) have analysed policy texts issued by the Royal Ministry of Education, Research and Church Affairs of Norway and the public debate concerning the curriculum, in order to find out how the curriculum adopted in 1997 reflects Norway's national culture or identity. According to them, "the underlying assumption in the curriculum is that personal identity develops through a common base of knowledge, culture and values"; they also conclude that "this perspective relies on a monocultural ideal of the society" (Gudem & Karseth 1998, 10). They argue that "at a time when the need to create a scope for pluralism is evident", there is a strong tendency toward securing the common cultural heritage (Gudem & Karseth 1998, 8). They use Jane Franklin's expression 'nostalgic community' to describe Norway's policy (Gudem & Karseth 1998, 10).

I have argued in this thesis that the national heritage is highly valued in Sweden as well. One significant difference between the two countries, however, is that in Norway Christianity, as part of the national culture, is more profoundly tied in with educational goals – and in what can be seen as a unique manner. According to the Core Curriculum (1997),

The Christian faith and tradition constitute a deep current in our history – a heritage that *unites us as a people across religious persuasions* (Royal Ministry of Education, Research and Church Affairs 1997, 7; italics added).

It is worth mentioning that Christianity is strongly present in the illustration of Core Curriculum. It is also stated that "education must be based on the view that all persons are *created equal*" (Royal Ministry of Education, Research and Church Affairs 1997, 7; italics added).

The role of Christianity is evident when the society's values and their instilling in pupils are discussed in the Core Curriculum. The text first states that the fundamental values of the society are the values of Christianity and humanism. It then continues: "[e]ducation must ... authenticate society's ideals and values and enliven them so that they become a potent force in people's lives". In this process, religious education can be used as a tool:

These [ethical principles and norms] in turn can be elucidated by Biblical similes, but also by illustrations from other religions, from history, fiction, biography, and from legends, parables, myths and fables. (Royal Ministry of Education, Research and Church Affairs

he/she will personally assume the responsibility for the child's religious instruction" (Danish Ministry of Education 2010, par 6(2)).

1997, 7-9.)

But if we look at these “unwithering values” that are to guide Norwegians’ conduct (Royal Ministry of Education, Research and Church Affairs 1997, 7), there are actually no differences from Sweden. Norway’s Education Act, the Core Curriculum and the Syllabus for Religious Education contain the following explicitly stated values: equality, human rights, inviolability of human dignity, rationality, solidarity, selfless behaviour, tolerance, and honourable and courteous behaviour (Royal Ministry of Education, Research and Church Affairs 2008; 2005; 1997). The main difference between Norway and Sweden is that the same values that in Sweden are regarded as fundamental democratic values are seen in Norway as Christian and humanistic ones.

We can ask, then, why Christianity is emphasised in Norway. According to Geir Skeie (2006a, 22), one of the main reasons can be traced to concerns about the disintegration faced by post-modern society:

[t]he present remedy is partly a recognition of diversity, but mixed with a ‘cultural’ and ecumenical version of Christianity, used as a kind of ‘civil religion’, putting emphasis on national heritage and moral values.

The point is that Norway takes a monoculturalistic approach in order to deal with the situation of cultural plurality. If this kind of ‘thinking’ also guides the educational system, it is certainly difficult to maintain neutrality.

What, then, can be said about the purpose of religious education? In the light of the views of international actors, one conclusion to be drawn is that religious education is an important instrument for achieving a more tolerant society. The United Nations’ Special Rapporteur Abdelfattah Amor argued that there is a need to get rid of the dichotomy of ‘us’ versus ‘them’, and to develop both the child’s self-understanding and his or her understanding of others. (Amor 2001, par 22). In the case of the Council of Europe, the starting point was that pupils need to be prepared for a responsible life in a free society in a spirit of understanding, peace, tolerance, gender equality and friendship among all peoples. The Council suggests the development in the field of religious education of certain ‘basic modules’, that can then be applied in various educational systems. (Council of Europe 2005c.) The goal is that pupils should receive education in religious and secular diversity and be encouraged to enter into intercultural and inter-religious dialogue. The Council has also appointed a group of specialists in religious and intercultural education, to produce a teacher’s guide on how to deal with religious diversity. The resulting publication, *Religious Diversity and Intercultural Education: A reference book for schools*, was issued in 2007.

What we have seen in this chapter shows that when it comes to

education, religious groups cannot claim uniqueness for themselves in the sense that their code provides an exclusively reliable guide to the good life. First, human rights are presumed to transcend any individual privilege to which persons may be entitled by virtue of their membership in a group or a society. Secondly, pupils should be provided with tools to combat fanatical religious interpretations. This means that a critical attitude needs to be encouraged in pupils. Thirdly, information needs to be given in an impartial manner.

Chapter 7

Summary and discussion

Main conclusions revisited

In this work I have explored the strategies used in Great Britain, the Netherlands, Sweden, and Denmark, both in the past and currently, in dealing with cultural plurality. In addition, I have investigated ways in which the educational system in these countries is harnessed to produce tolerant citizens and to contribute to the creation of a more harmonious and cohesive society. With regard to education, I have also examined the content of values education to determine what kinds of ethical attitudes are cultivated in pupils, and have analysed recommendations by the Council of Europe and decisions handed down by two international courts concerning the appropriate nature of religious education.

All of these issues have been discussed in relation to a general question: what is considered the 'appropriate' place of religion in contemporary Europe? This question was subdivided into three more specific ones: 1) to what extent is space allotted to religion in the state and its public affairs (especially in the field of education); 2) what expectations and responsibilities are placed on citizens in general and on religious citizens in particular; and 3) how is the domain of the 'secular' preserved from the impact of that of the 'religious'.

In Chapter 2 I focused on the question of how the national and regional identity is imagined and articulated in policy documents and statements issued by politicians. The focus of my enquiry was on the imagination of the national self. I was interested in national identity, because the way in which politicians imagine and articulate the nation can be viewed as one manifestation of what can be identified as the overall policy of treating cultural plurality. The notion of identity also provides an interesting arena for the discussion of the nature and characteristics of a given society.

The analysis of the empirical material was based on the idea that the articulation of a national identity can be considered an epistemological reality, a perspective *on* the world (Brubaker et al. 2004, 45); in other words, such an articulation provides information as to how reality is perceived and constructed by politicians in this particular matter. I started with the assumption that in a multicultural nation the identity of a community is

defined in such a way as to allow as many people as possible to identify with it. I also introduced a normative claim, according to which national identity should be defined in such a way as to include all its citizens (Parekh 2000, 233). My purpose was to find a common denominator, sameness, and to answer why precisely a given sameness is regarded as a necessary ingredient of a national identity.

What I found was that in each nation, as well as in the Council of Europe and European Union, the core of identity consists of values.¹ In each nation politicians talk about ‘our values’; but when we compare these values, we find that they are strikingly similar. It is thus more appropriate to speak of democratic, liberal and/or human rights values.² Another interesting finding was that in some of the documents explored human rights values and humanist morality are seen as a continuum, with its origin in Christianity or in the roots of the three monotheistic religions.

I connected articulations of national identity to a theory proposed by Triandafyllidou (1998), according to which in the process of creating a national identity a significant role is played by the ‘other’. I argued that one reason for the need to stress the importance of a society’s core values is, inevitably, the belief that the values of some religions, above all those of Islam, are perceived as threatening the sameness or uniformity that is believed to exist among the majority.

I also asked what is required of citizens to fit into a given definition of national identity, and argued that the main marker of inclusion or exclusion is attitude. All citizens are expected to have a positive attitude towards the society’s values. Furthermore, in some cases it is expected that these values will take precedence over individual cultural values. In the case of a conflict between the values of the society and those that are culturally driven and privately held, there is nothing to negotiate. In this sense, national policies can be expressed as “When in Rome, do as the Romans do”.

I further explored the question whether, in the documents analysed, religion serves as a marker of distinction as to who is regarded as a ‘respectable’ member of the society. In this connection, I referred to the study by Bauder & Semmelroggen (2009) concerning the parliamentary debate over immigration in Germany. According to Bauder & Semmelroggen (2009, 14) “[t]he new perspective of German identity excludes immigrants based on

¹ In addition to values, language was also often mentioned as an important element of national identity.

² According to Alasdair MacIntyre, the concept of human rights has its origin in the late eighteenth century in the idea of ‘the rights of a man’. At that time rights were defined negatively, i.e. as rights in which no one is allowed to interfere (MacIntyre 2004, 93-94). Turner (2011, 232) writes that the philosophical foundation for the development of the rights of man can be traced to Locke’s defence of tolerance and Leibniz’s idea of respecting other cultures. The first formulation of the notion of individual rights, however, is by Adam Smith.

their religion rather than their ‘ethnic’ origin.” I referred to the idea of the Christian cultural milieu, which marks the majority as ‘us’, and suggested that while this milieu includes illiberal interpretations of the Christian faith, religion might serve as a reason in making the difference.³ However, the material analysed does not offer strong evidence in favour of such a view. As noted in Chapter 3, in the documents and statements issued by politicians, religion, in particular Islam, is often referred to as an example of something unwanted in a society. In other words, some religions are ‘accused’ of upholding attitudes that conflict with the society’s fundamental values. Indeed, in this sense national identity excludes citizens based on their religion. This, however, is only half story: when it comes to explicitly articulated definitions of identity or solutions to a perceived problem, namely how to achieve a more cohesive society, it is clearly attitude that serves as a marker of belonging. Citizens are expected to fulfil certain responsibilities, including a respect for the society’s core values and an attitude of good will towards other members of society. Thus no one is excluded due to religious affiliation as such. In principle, Muslims who assimilate their responsibilities as citizens are regarded as respected members of a society.

I asked why it is so important that the society’s values need to be not only accepted but also internalised, as personally binding in some respects. I wrote that for the majority of citizens within Europe, the significance of core values does not lie merely in providing a framework enabling peaceful co-operation among citizens, as suggested for example by Rawls. In Chapter 2 introduced a global survey by Inglehart and Baker (2000), according to which Europe has a long historical tradition of cultivating democratic values and these have been deeply internalised by citizens. It can thus be argued that if citizens act according to these values, this creates a sense of security and belonging among people. From this perspective, the negative attitudes toward Muslim women wearing a hijab or niqab become more understandable.⁴ The veil can be seen as a symbolic negation of respect for fundamental democratic values, namely individual liberty and gender equality.

In Chapter 3 I extended the discussion of the importance of the society’s core values, arguing that in Great Britain, the Netherlands, Sweden and Denmark mass immigration has led to fears of fragmentation and segregation; this in turn has led to a need to reaffirm not only the nation’s existence but its unity and character as well. Referring to Durkheim’s theory of religion, I argued that in all these nations politicians seem to envisage a

³ It may be recalled that in Chapter 1 I referred to Loraine Sheridan’s (2002) study, according to which religion seem to trigger both implicit racism and general discrimination. However, what is interesting is that after the terrorist attacks of September 11 in 2001, Muslims, Sikhs and Hindus reported an increase in their experiences of implicit racism, while Christians and Jews reported a decline in such experiences.

⁴ This is not to say that negative attitudes are acceptable.

society built upon the idea of citizens forming a single moral community. Despite the fact that cultural plurality is seen as something that should be valorised, the goal is nevertheless a strong civic sphere. At the heart of this lies a respect for values and for a sense of solidarity.⁵ Since it is stressed that all citizens, without exception, should internalise these core values and have faith in them, in the sense that they provide mutual trust and predictability, it can be argued that these values form the sacred. By this I mean two things. First, core values form a framework or social structure that exists independently, outside the individual, while at the same time exerting a significant moral force over the lives of citizens. This is because values are experienced as obligatory and binding.⁶ Secondly, the debate over values shows that the society's core values are seen as untouchable, in other words as something special, beyond any possibility of change or compromise.

One pervasive question in this work has been this: how can – and should – citizens be treated in an equal manner in general and in education in particular. In Chapter 3 I introduced two theories, one by Kymlicka, the other by Taylor, that were in favour of the idea that in the name of equal treatment cultural minorities should receive special rights in order to ensure their survival. One finding in the empirical material was that in all four nations the strategy of integration leaves the maintenance of religious minority cultures and the upholding of religious identity to individuals. No extra institutional support is provided for this purpose. Equality is interpreted as meaning that all citizens are granted equal political rights. In this sense religion is regarded as a private matter.⁷ Thus the term 'religion-blind' treatment is applicable. In Chapter 1 I presented Soysal's (1994) view, according to which the rights of citizens are no longer linked to national or cultural identity but to the fact that one is a human being. This claim is also applicable to the treatment of cultural diversity. The leading principle, as already noted, is that all citizens are entitled to exactly the same rights.

⁵ According to Durkheim, unity among members of a certain group "can be achieved only by means of meetings, assemblies, or congregations in which individuals, brought into close contact, reaffirm in common their common feelings" (Durkheim 2001, 322). My point is that even if citizens are not physically brought into close contact, they are expected to share similar values and fulfil their responsibilities as citizens.

⁶ The essential point in Durkheim's theory of religion is the division of the universe into two mutually exclusive parts, the sacred and the profane. The dichotomy between the individual and the collective plays a crucial role in this distinction.

⁷ It is worth noting that in some respects religion is also a public matter. In the Netherlands culturally founded identity is a matter of public recognition, and religion plays an important role in public institutions since the government finances schools, hospitals, media channels, social work etc. on a religious basis. (Koopmans 2003, 4.) In Britain, for example, the Jews and the Sikhs are recognised as ethnic groups, and are entitled to certain group-specific rights (Barry 2001). However, this is a rather unusual arrangement, nor does it apply to all groups equally.

It is also worth noting that in the course of history none of these countries has applied a policy that could be called 'active multiculturalism' in Bleich's sense of the term.⁸ In the case of selected policies from the 1990s, suggestions of the kind offered by Kymlicka and Taylor are not seen by political actors as viable future solutions. In the documents analysed these ideas are not even discussed. In the case of the Netherlands and Sweden, earlier policies, i.e. those in which immigrants were defined by their collective identities, have since come to be regarded as having caused problems to both sides: to immigrants and to the majority population. In Chapters 2 and 3 I pointed out that in Sweden it was admitted in the 1980s that one bedrock of the *immigrant and minority policy*, the principle of 'freedom of choice', had led to false interpretations on the part of some immigrants as to kind of what cultural practices are legitimate. Thus the state needed to clarify what norms should be accepted and followed by all citizens. Furthermore, in the 1990s it was admitted that the *immigrant and minority policy* had caused a breakdown of the population into 'us and 'them', thereby contributing to the rise of alienation in many immigrants and their children. In addition, many majority citizens saw this kind of arrangement as a threat to the Swedish national character. (Riksdagen 1997, 18.) In the Netherlands, the *ethnic minority policy* implemented in 1980s was changed in 1990s because the integration of immigrants was not successful.

In tracing the policies applied in Great Britain, the Netherlands, Sweden and Denmark in dealing with cultural plurality, I have made use of models presented by Bleich, Alexander, Hartmann and Gerteis. I have argued that all these nations' attempts to create a strong civic sphere have necessarily meant a certain degree of acculturation and assimilation. However, I have also argued that the material does not indicate that the aim has been to erase difference at all levels. While citizens are expected to adopt a kind of meta-identity, a civic identity, transcending their cultural identities, they are free to keep their cultural and other customs as long as these do not violate the society's ideals. It should also be noted that in the documents from all four countries the plural nature of the society is strongly present. This holds true both for documents concerning the management of plurality at a general level and for those dealing with educational arrangements. In this sense, the reaffirmation of national character is not only about adhering to 'old' ideas about what that character is but also about acknowledging a (new) plural identity.

With regard to the models presented by Bleich, Alexander, Hartmann and Gerteis we can infer that they are not applicable as such to any of the four countries. No current policy strongly resembles any of the typologies

⁸ According to Bleich (1998, 83), active multiculturalism means that the state is active in attempting to create a new national culture which encompasses minority as well as majority cultures and perspectives.

given. The contribution of the models to this thesis has been in providing interesting questions and points of view for the analysis of the former and current policies practiced in Britain, the Netherlands, Sweden and Denmark, and in offering a perspective in evaluating other scholars' conclusions as to the kinds of policies European nations are currently applying.

To sum up the strategic choices presented above: it can be argued that in Britain, the Netherlands, Sweden and Denmark there has been an increased need to monitor the normative level of cultural plurality: in other words, citizens' thoughts and attitudes as to what is worthwhile, what is right or wrong, and other questions concerning values.

With regard to the question of how the educational system is harnessed to produce tolerant citizens and to contribute to the creation of a more harmonious and cohesive society, I began by focusing on politicians' attitudes towards faith schools. I showed that in Great Britain, the Netherlands, Sweden and Denmark there has been rising doubt as to whether faith schools can promote in pupils the virtues and the necessary knowledge that are regarded as a prerequisite to the achievement of a cohesive society. As a consequence, the activities of some faith schools in this respect have been monitored carefully. Britain, the Netherlands and Denmark have also initiated the revision of school curricula. In the first decade of this millennium, 'citizenship education' has been introduced in Britain and the Netherlands as a new, compulsory subject, while in Denmark special programs have been established to help pupils to function successfully and peacefully in a multicultural society. In Sweden a subject under the name of 'Civics' already existed; its goals are similar to those of citizenship education in Britain and the Netherlands.

It can thus be argued that the public stake in the field of education has been recognised, and that previous actions toward creating tolerant and understanding citizens are now seen as insufficient. The measures taken are a concrete example of nations' increased need to control what kind of attitude is cultivated in future citizens.

At the beginning of Chapter 4, I introduced scholarly views as to whether or not faith schools can produce social cohesion. It is interesting to note that the investigations⁹ carried out in faith schools in Britain and the Netherlands seem to confirm the arguments offered by Burtonwood, Short and Lenga, according to whom what counts is not that pupils with different cultural backgrounds are in direct contact with each other; rather, it is the curriculum of the school, and of course its successful implementation in practice, that is important. Politicians and the public, however, seem to share

⁹ Ofsted: *'Independent faith schools'* (2009); Inspectorate of Education: *Islamic Schools and Social Cohesion* (2002); the Dutch Secret Service (BVD): *The Democratic Legal Order and Islamic Education: Foreign interference and anti-integrative tendencies* (2002).

the opinion of those scholars, namely Kymlicka, Moller-Okin, Reich and Jackson, who perceive a need to increase interaction among pupils with different cultural backgrounds.

Chapter 4 concluded with a brief discussion of the possible pitfalls of civic education and of the inculcation of the society's values in pupils. I found that although curricular choices may be accused of not presenting diversity in an appropriate way, the programs include giving pupils information about different ways of life as well as encouraging them to take a positive attitude towards such ways of life and to engage in dialogue with pupils with a different cultural background. The point is that cultural plurality is not silenced but is treated as a public matter.

In Chapter 5, I analysed the nature of values education in the four countries. One interesting finding was in the framework guiding schooling arrangements the aim that pupils should internalise society's values was not explicitly articulated, except in Sweden. All four countries, however, shared the view that the desirable ethical attitude is essentially about possessing virtues that enable citizens to co-operate peacefully. After a successful education, pupils are expected to have the ability to tolerate and respect or even empathise with others and their values. The key methods in achieving this goal are giving students impartial knowledge about different ways of life and encouraging them to discuss their differing belief systems and values. In Britain teachers are obligated to explicitly present and discuss controversial issues.

In the same chapter, I referred to McLaughlin's (1995, 248) normative position that the distinction between public and private values should be respected: the schools should make it clear to pupils that even though some culturally held values may conflict with those of the society, they are not necessarily wrong. This seems most difficult to accomplish in Sweden, since the goal of education is a citizen who has deeply internalised the society's fundamental values. I have argued that this means that the distinction between private and public values cannot be meaningfully maintained.

I also analysed the nature of ethical reflection and its goals. At the beginning of the chapter I referred to other scholars' ideas about the importance of promoting autonomy. The analysis of the concrete solutions implemented by Britain (England), the Netherlands, Sweden and Denmark shows that the current trend is clearly to enable pupils to be autonomous persons, which in moral matters means that they are given the means and are encouraged to independently reflect upon the validity of different moral positions. Whatever desires the parents may have in this respect, the interests of the child as a future citizen takes precedence.

In Chapter 1, I referred to Sakaranaho (2006) and Maréchal (2003) in noting that particularly some Muslims experience a contradiction between the values and worldviews of the school and the home. I also commented, referring to Turner (2011), on changes taking place within Muslim

communities, since it is not clear to all members under what norms a good Muslim should live in a secular society. Interestingly new sources of authority have emerged to challenge the traditional framework of social consensus within Muslim communities. With regard to these points, I asked what kind of strategic choices the states have made to enable the inner development of religious traditions toward greater appropriateness in the eyes of a secular society. In the light of my findings as to the means and content of values education, it is clear that official state actions encourage Muslim pupils to challenge the validity of traditional authority in deciding upon right and wrong or the right course of action.

One area of interest in Chapter 5 was to investigate whether in religious education morality as a phenomenon is tied to religion. I found that even though the reflection of moral questions starts within the framework of religions' ethical norms, in upper classes the questions and answers are not tied to religion. Rather they are treated as philosophical questions.

As a summary about the nature of religious education, it can be argued that it is currently believed to have high extrinsic value, since it can contribute to the development of those mental abilities that pupils need as citizens living in a multicultural society. RE has been harnessed to work towards a more stable and just society.

In Chapter 6, I explored how international actors – the Council of Europe and the United Nations, as well as international courts such as the European Court of Human Rights and the United Nations Human Rights Committee – see what kind of RE would be appropriate and legitimate. According to both the Council of Europe and Special Rapporteur Amor as a representative of the United Nations, religious education plays a very important role in making tolerant citizens. Amor was in favour of creating a uniform approach, in which all pupils take part in the same religious education lessons. The Council of Europe argued for 'education *about* religion'; in other words, pupils should be given impartial information about the beliefs, values and practices of different religions.

How is the legislative framework interpreted with regard to controversial issues and religious education? The general rule is that in any case of conflict, education that is in accordance with the principles of human rights should always supersede religious values. Children's needs are interpreted through the frame of what skills and abilities they will require as future citizens in order to live successfully in a diverse society. Thus no child can be kept ignorant with regard to what is going on in society. It is emphasised that information should be conveyed in an impartial, neutral and objective manner. Quite recently, it has also been emphasised that religious issues should be discussed in such a way as to develop a "critical mind" in pupils (ECHR 2007b, par 69). This is a rather explicit response to the question whether or not parents' desires to shelter their children from secular influences should be respected.

At the beginning of Chapter 6, I wrote that two types of complaints, namely inclusion and exclusion complaints, can be and have been made about the content of religious education. As an example of an exclusion complaint, I referred to Bonna Haberman's argument according to which education easily comes to exclude the possibility of passing on traditional life-styles from one generation to the next. According to Haberman (1994, 185), giving real opportunities for example to religious parents to initiate their children into a certain way of life would make pluralism meaningful. However, nothing suggests that the international actors referred to in this thesis share such an opinion. Quite the contrary: as noted above, it is the abilities that pupils are believed to need in the future that set the criteria for appropriate content for religious education. In other words, plurality requires that the schools equip pupils both with a certain body of knowledge and with the skills to co-operate with each other.¹⁰

With regard to the views presented above, there are two approaches to religious education that deserve to be mentioned here. The first, known as 'critical religious education', is supported by L. Philip Barnes and Andrew Wright. In their article 'Romanticism, representations of religion and critical religious education' (2006), the authors argue that in a situation of cultural plurality religious education should retain the integrity of different religions, while helping pupils to handle religious language and claims with intelligence and informed judgement. The starting points for proper religious education are (i) the broadest possible freedom of belief, (ii) tolerance of the beliefs of the others, (iii) maximising the "wise debate between adherents of differing beliefs systems and world views", and (iv) cultivating "[the] pursuit of truth and truthful living" (Barnes & Wright 2006, 73-74). With regard to the last criterion, Wright (2004, 168-179) writes that in a culturally diverse world "religious and secular worldviews are grounded in fundamentally incompatible ontological foundations"; and this requires, according to Wright, that all pupils be enabled to achieve "appropriate levels of religious literacy".¹¹

This kind of approach is pretty much in line with the international actors analysed in this thesis. It aims at cultivating both autonomy and critical thinking in pupils, while encouraging them to engage in mutual debate. Another suggestion for the organisation of religious education that is in line with the international perspective is called the 'interpretative approach'. In

¹⁰ In Chapter 6, for example, I wrote that in 1993 the Council of Europe was of the opinion that pupils should be given possibilities to become familiar with their own religion and its ethical principles, but in 1999 the importance of gaining knowledge about other religions was elevated as the primary target of religious instruction. The idea of learning about the basic principles of one's own religion is not found in the Council's documents since 1993.

¹¹ Wright's argument is actually provided as a defense of religious education as independent subject.

this regard, Jackson (2004b, 4) sums up his view: “the most appropriate pedagogical responses to plurality in the common school provide a framework of democratic values which respect diversity within the law and allow pupils to clarify and refine their own position on religion.”¹² The interpretative approach has three key pedagogical principles. First, *representation* means that religious traditions are not represented as “bounded systems but in ways that recognize their diversity and the uniqueness of each individual who is subject to many influences (e.g. from membership group, wider tradition and beyond tradition)”. Second, *interpretation* means that pupils need not set aside their own presuppositions, “but should compare their own concepts with those of others”. Third, *reflexivity*: Pupils are encouraged to be “constructively critical” of their own ways of life. (Jackson & O’Grady 2007, 196.)

One more point needs to be mentioned before discussing my findings concerning the ‘appropriate’ place of religion in Great Britain, the Netherlands, Sweden and Denmark. In Chapter 6, I presented the Council of Europe’s (2007a) negative view on teaching creationism in schools. The idea I raised was that in the Council’s Resolution, ‘The dangers of creationism in education’, certain epistemological requirements, namely that the knowledge taught has been produced by scientific methods, are a necessary condition for the maintenance of a healthy democracy. The ability of religion to provide appropriate knowledge is explicitly rejected in this particular matter, i.e. what is the origin of forms of life. A stance is also taken in favour of the view that schools, as public institutions, should represent solely ‘secular’ ideas in this matter. In Chapter 4 I argued that in Sweden as well the new legislation mandates that knowledge presented in any type of school should be impartial and based on scientific grounds alone; thus the teaching of creationism is prohibited.

Summary and discussion: the ‘appropriate’ place of religion

In Chapter 1, I wrote that the more visible presence of Islam is one reason why the distinction between the public and the private has been challenged in Europe. This is due to the fact that the culture that immigrant Muslims have inherited does not recognise the notion of private religion (Lehmann 2006, 284). Furthermore, as I have shown in this work, the public-private distinction is challenged because it is argued that religious minorities should be given public support to enable them to secure their existence. I have mainly focused on actions by those who stand in the other camp, namely secular officials, and have explored ideas as to the appropriate place of religion in a multicultural Europe. As a general conclusion, we can say that

¹² It is worth noting that Jackson has been a member of the drafting team of the Council of Europe Ministerial policy recommendation on teaching about religions and beliefs.

not only is the boundary between the public and the private unstable and vague, but current policies also give cause to argue that in certain areas the distinction is impossible to maintain; the obvious outcome of defending the ideals of the public sphere is that secular ideals will penetrate into the private one, as shown in the following paragraphs.

First, with regard to the question ‘what expectations and responsibilities are placed on citizens in general and religious citizens in particular’: as I have indicated, it is considered important for the sake of a harmonious society that all citizens should not only have a positive attitude towards the society’s (public) values but should also act according to them, even if these public values conflict with those possibly held privately. The need for assimilation and acculturation in this matter is one example of how public ideals should be considered valid in private as well. I have argued that the states are departing from the traditional separation of state and religion by attempting to create a ‘liberal state of mind’ in citizens. In the material referred to in Chapters 2 and 3, it is merely stated that citizens should accept these values, while Chapters 4 and 5 give examples of concrete actions taken to achieve this goal.

Secondly, citizens are expected to acquire knowledge about different ways of life in order to better understand each other. In the case of education, this means that pupils are not only given information about different ways of life, but are also, and for the same reason, encouraged to engage in mutual dialogue. This too means that religious beliefs are not considered as private matters.

When it comes to ways of preserving the domain of the ‘secular’ from the impact of that of the ‘religious’, one concrete example is the arrangement of education in Great Britain, the Netherlands, Sweden, and Denmark, based on the principle that pupils are expected to adopt Enlightenment-inspired forms of critical thinking. This also includes education in moral and religious matters, which have been regarded as matters of ‘conviction’. I have shown that pupils are encouraged to approach issues related to values and morality with a scientific attitude. In this process the approved-of key words are ‘knowledge’, ‘proof’, ‘evidence’, ‘discussion’ and ‘argumentation’. In Chapter 6, I explored the perceptions of the international courts in this matter. The most striking example of how secular ideals are to be applied in education comes from the European Court of Human Rights. Not only should pupils receive neutral and objective knowledge, but they should also be enabled to take a critical attitude with regard to religious matters. It can thus be argued that the underlying assumption with regard to educational goals is that

[h]uman rationality is universal, requiring only education for its development. In the virtue of their common rationality, all human beings have certain rights, among them the *rights to choose and*

shape their individual destinies. (Cambridge Dictionary of Philosophy 1999, 266; italics added.)

I am not saying that the evident outcome of successful education is that children will apply critical thinking, for example as to the validity of the way of life taught to them by their parents. I am merely claiming that the distinction between the public and the private domain is not respected, in that religious ‘conviction’ is not left intact and parents do not retain the authority to decide upon the extent or form of their children’s education in religious and moral matters.

What, then, can be said as to the question ‘to what extent is space made for religion in the state and its public affairs (especially in the field of education)’? It is obvious that religion and its effect on society are recognised as public matters. Religion is not privatised but is welcomed into the public domain. As already noted, pupils are given information about different ways of life and are encouraged to engage in mutual dialogue. Expressions of religion are also taken seriously.

In Chapter 1, I wrote that the distinction between ‘religion’ and the ‘secular’ can ultimately be reduced to the ways these concepts are understood and deployed. In *Discourse on Civility and Barbarity* (2007), Timothy Fitzgerald argues that ‘religion’ is “a modern invention” (Fitzgerald 2007c, 6); there is no such thing as ‘religion’ as a separate entity of reality. Religion and politics (representing the secular) are defined in such a way that the two are seen as mutually exclusive domains (Fitzgerald 2007c, 173).

In this work I have applied as a methodological tool Kim Knott’s model for locating religion in secular contexts. In this model, the ‘secular’ and the ‘religious’ are treated as distinct, separate and mutually exclusive domains. My idea in applying the model was based on the interpretation that the public sphere is regarded as representing the secular, which in turn is assumed to be an ideologically neutral and objective space. However, it is necessary to note that in real life religious issues are an important part of the public sphere. As we have seen, religions are allowed to enter the public domain. In the view of the Council of Europe, for example, religions can contribute an important moral dimension (if it is in accordance with the principles of human rights), and can help in the fight against *religious* extremism. The fundamental point is that if religions accept ‘secular’ ways of acting and engaging in discussions over the right course of the society, their influence will be welcomed. In present-day Europe, within the non-negotiable framework based on liberal and democratic values and those of human rights, the ‘appropriate’ interpretation of many values is the subject of continuous debate.¹³ Religions

¹³ An illuminating example: in 2011 in Finland, in order to gain a parliamentary majority, the leading party in Parliament, the National Coalition party [Kansallinen Kokoomus], had to accept the demand of the Christian Democratic party [Kristillisdemokraati] that in the following four years the government would not propose a new marriage law, giving

– or, more precisely, arguments involving an implicit or explicit rationale based on the belief that a certain religion’s ‘truth’ should be applied – are not automatically set aside in this project.

It seems, then, that Europe has entered into a post-secular era: one in which the influence of the domain of the ‘religious’ is no longer expected to decline or diminish. Rather, some religions are accepted as valid partners in the democratic decision-making process. In this sense, in Knott’s methodological model the category of ‘post-secular’, which referred to ‘spirituality’ rather than ‘religion’ or ‘religiosity’ (Knott & Franks 2007, 2), could have a different meaning. What is obvious, however, is that in order to be taken seriously as a publicly accepted stake-holder, a religion has to meet certain prerequisites.

In this sense, the relevant question is not that of the appropriate place of religion, but that of the form or content of religion required to satisfy the conditions for acceptance in the public sphere. In this thesis, I have explored the role of values in this project. It is evident that the more ‘sacred’, non-negotiable attributes a given religious affiliation has that conflict with liberal democratic values, the less it will be welcomed as part of the democratic decision-making process. It seems, however, that this is not the only criterion in considering why certain religions are taken more seriously than others. I have also suggested that being part of the European cultural context itself may confer a crucial advantage over other religions, such as Islam.

same-sex couples similar rights with others (see e.g. *Helsingin Sanomat* 2011). Before the election, the National Coalition party held that the current law did not treat all citizens equally, and that a new, gender-neutral law should be enacted (see e.g. *Uusi Suomi* 2010).

Bibliography

Primary sources

- Adler, E. (2001). Conclusions. From cultural identities to a European political identity. The European Identity (now and in the future): Colloquium in three parts (2001-2002). Council of Europe. Online: http://www.coe.int/T/E/Com/Files/Themes/Identity/e_adler1.asp#TopOfPage, accessed October 2010.
- Amor A. (2001). Introductory Note: A paper presented in International Consultative Conference on School Education in relation with Freedom of Religion and Belief, Tolerance and Non- discrimination in Madrid, 23-25 November 2001. Online: <http://www.unhchr.ch/html/menu2/7/b/cfedu-basicdoc.htm>, accessed May 2007.
- BBC (2005). Brown seeks out 'British values'. 14 march 2005. Online: <http://news.bbc.co.uk/2/hi/programmes/newsnight/4347369.stm>, accessed April 2011.
- Bell, D. (2005). What does it mean to be a citizen? A speech to the Hansard Society. *The Guardian*. 17 January 2005. Online: <http://www.guardian.co.uk/education/2005/jan/17/faithschools.schools>, accessed April 2011.
- Björklund, J. & Sabuni, N. (2008). Tvinga invandrarflickor att delta i sexundervisning. Op-ed column, *Dagens Nyheter*. 3 March 2008. Online: <http://www.dn.se/opinion/debatt/tvinga-invandrarflickor-att-delta-i-sexundervisning-1.565507>, accessed April 2011.
- Björklund, J. & Sabuni, N. (2009). Slut med befrielse från skolans sexundervisning. Op-ed column, *Dagens Nyheter*. 31 May 2009. Online: <http://www.dn.se/opinion/debatt/slut-med-befrielse-fran-skolans-sexundervisning-1.880500>, accessed April 2011.
- Blair, T. (2001). A speech given at Westminster Central Hall. *The Guardian*. 30 March 2001. Online: <http://www.guardian.co.uk/politics/2001/mar/30/uk.welfare>, accessed April 2011.
- Blunkett, D. (2005). A new England: An English identity within Britain. Speech to the Institute for Public Policy Research (IPPR). 14 March 2005. Institute for Public Policy Research.
- Bron, J., Hooghof, H., Letschert, J., Studulski, F. & Timmerhuis, A. (2007). *Core Affairs: The Netherlands. Case Studies Basic Education in Europe*. Enschede: SLO (National Institute for Curriculum Development).
- Council of Europe (1950). European Convention on Human Rights (formally European Convention for the Protection of Human Rights and Fundamental

- Freedoms). Online:
<http://conventions.coe.int/Treaty/en/Treaties/Html/005.htm>, accessed April 2011.
- Council of Europe (1993). Recommendation 1202 on religious tolerance in a democratic society. Text adopted by the Parliamentary Assembly 2 February 1993. Online:
<http://assembly.coe.int/Main.asp?link=/Documents/AdoptedText/ta93/EREC1202.htm>, accessed April 2011.
- Council of Europe (1999). Recommendation 1396 Religion and Democracy. Text adopted by the Parliamentary Assembly 27 January 2002. Online:
<http://assembly.coe.int/main.asp?Link=/documents/adoptedtext/ta99/erec1396.htm>, accessed April 2011.
- Council of Europe (2001). Doc. 9215 Religion and democracy. Recommendation 1396, Reply from the Committee of Ministers, adopted at the 765th meeting of the Ministers' Deputies 19 September 2001. Online:
<http://assembly.coe.int/main.asp?Link=/documents/workingdocs/doc01/edoc9215.htm>, accessed April 2011.
- Council of Europe (2001a). Conclusion summary. The concept of European identity. The European Identity (now and in the future): Colloquium in three parts (2001-2002). Online:
http://www.coe.int/T/E/Com/Files/Themes/Identity/e_conclusion1.asp#TopOfPage, accessed May 2008.
- Council of Europe (2001b). From cultural identities to a European political identity. Colloquium in three parts (2001-2002). Online:
http://www.coe.int/T/E/Com/Files/Themes/Identity/e_Colloque2.asp, accessed May 2008.
- Council of Europe (2002a). Presentation paper. Europe tomorrow: shared fate or common political future? The European Identity (now and in the future): Colloquium in three parts (2001-2002). Online:
<http://www.coe.int/T/E/Com/Files/Themes/Identity/>, accessed May 2008.
- Council of Europe (2002b). Recommendation Rec (2002)12 of the Committee of Ministers to member states on Education for democratic citizenship. Adopted by the Committee of Ministers on 16 October 2002 at the 812th meeting of the Ministers' Deputies. Online:
<https://wcd.coe.int/ViewDoc.jsp?id=313139&BackColorInternet=DBDCF2&BackColorIntranet=FDC864&BackColorLogged=FDC864>, accessed May 2008.
- Council of Europe (2003). Resolution Res(2003)7 on the youth policy of the Council of Europe. Adopted by the Committee of Ministers on 29 October 2003 at the 859th meeting of the Ministers' Deputies. Online:
[https://wcd.coe.int/ViewDoc.jsp?Ref=Res\(2003\)7&Language=lanEnglish](https://wcd.coe.int/ViewDoc.jsp?Ref=Res(2003)7&Language=lanEnglish)

&Site=CM&BackColorInternet=9999CC&BackColorIntranet=FFBB55&BackColorLogged=FFAC75, accessed April 2011.

- Council of Europe (2004). Analytical Repertoire of official texts and projects of the Council of Europe of the Field of Intercultural Education. Paper presented in the Conference on “The religious dimension on intercultural education” in Oslo, Norway, 6-8 June 2004. Online: http://www.coe.int/t/e/cultural_co%2Doperation/education/intercultural_education/EDGIV_EDU_DIAL_2004_%2010%20repertoire1.pdf, accessed April 2011.
- Council of Europe (2005a). Colloquy on European culture: Identity and diversity. Colloquy Report. Online: http://www.coe.int/t/dg4/culturalconvention/CIRreport_en.asp, accessed April 2011.
- Council of Europe (2005b). Faro Declaration on the Council of Europe’s Strategy for Developing Intercultural Dialogue. Ministerial Conference 28 October 2005. DGIV/DC-FARO (2005). Online: http://www.coe.int/t/dg4/CulturalConvention/Source/FARO_DECLARATION_Definitive_Version_EN.pdf, accessed April 2011.
- Council of Europe (2005c). Recommendation 1720 Education and religion. Text adopted by the Parliamentary Assembly on 4 October 2005 (27th Sitting). Online: <http://assembly.coe.int/main.asp?Link=/documents/adoptedtext/ta05/erec1720.htm>, accessed April 2011.
- Council of Europe (2005d). Doc. 10673 Education and Religion. Report of the Committee on Culture, Science and Education, rapporteur: André Schneider, France, Group of the European People’s Party. 19 September 2005. Online: <http://assembly.coe.int/main.asp?link=http://assembly.coe.int/documents/WorkingDocs/doc05/EDOC10673.htm>, accessed April 2011.
- Council of Europe (2007a). Resolution 1580 The dangers of creationism in education. Text adopted by the Parliamentary Assembly on 4 October 2007 (35th Sitting). Online: <http://assembly.coe.int/main.asp?link=/documents/adoptedtext/ta07/eres1580.htm>, accessed April 2011.
- Council of Europe (2007b). Doc. 11375 The Danger of creationism in education. Report of the Committee on Culture, Science and Education, rapporteur: Mrs Anne Brasseur, Luxembourg, ALDE. 17 September 2007. Online: <http://assembly.coe.int/main.asp?link=/documents/workingdocs/doc07/edoc11375.htm>, accessed April 2011.
- Council of Europe (2007c). Recommendation 1804 State, religion, secularity and human rights. Text adopted by the Parliamentary Assembly on 29 June 2007 (27th Sitting). Online:

- <http://assembly.coe.int/main.asp?Link=/documents/adoptedtext/ta07/erec1804.htm>, accessed April 2011.
- Council of Europe (2007d). State, religion, secularity and human rights. Doc. 11298. Report of the Committee on Culture, Science and Education, rapporteur: Mr de Puig. Explanatory memorandum. 8 June 2007. Online: <http://assembly.coe.int/Main.asp?link=/Documents/WorkingDocs/Doc07/EDOC11298.htm>, accessed April 2011.
- Council of Europe (2009). Overview of EDC (Education for Democratic Citizenship) in Netherlands. Citizenship Education and Civic education in Schools. Online: http://www.coe.int/t/dg4/education/edc/2_EDC_HRE_in_member_states/Country_profiles/Profile_NETHERLANDS_en.asp#TopOfPage, accessed April 2011.
- Council of Europe (2011a). The Council of Europe in Brief. Online: <http://www.coe.int/aboutCoe/default.asp>, accessed April 2011.
- Council of Europe (2011b). Committee of Ministers. Online: http://www.coe.int/t/cm/home_en.asp, accessed April 2011.
- Council of Europe Publishing (2007). *Religious diversity and intercultural education: a reference book for schools*. J. Keast (ed.). Strasbourg: Council of Europe publishing.
- Council of European Union (2004). Press release. 2618th Council Meeting (14615/04, Presse 321). Justice and Home Affairs. 19 November 2004. Brussels.
- Crossroads* (2007). A princess and a refugee stir national identity crisis in the Netherlands. 1 November 2007. Online: <http://crossroadsmag.eu/2007/11/a-princess-and-a-refugee-stir-national-identity-crisis-in-the-netherlands/>, accessed April 2011.
- Dagens Nyheter* (2007a). Religiösa inslag förbjuds i skolornas undervisning. 14 October 2007. Online: <http://www.dn.se/nyheter/politik/religiosa-inslag-forbjuds-i-skolornas-undervisning-1.595937>, accessed April 2011.
- Dagen Nyheter* (2007b). Kd står bakom Björklunds förslag. 15 October 2007. Online: <http://www.dn.se/nyheter/politik/kd-star-bakom-bjorklunds-forslag-1.517415>, accessed April 2011.
- Danish Ministry of Education (Undervisningsministeriet) (1999). *Uddannelse og fælleskab* (Education and community). Copenhagen: Danish Ministry of Education.
- Danish Ministry of Education (2000). *Værdier i virkeligheden* (Values in practice). Copenhagen: Danish Ministry of Education.
- Danish Ministry of Education (Undervisningsministeriet) (2002). *Rights and Duties in the Danish Comprehensive Primary and Lower Secondary*

- Schools*. Online: <http://pub.uvm.dk/2002/rettigheder/engelsk.pdf>, accessed April 2011.
- Danish Ministry of Education (2004). *Fælles Mål. Kristendomskundskab. Faghæfte 3*. Publikationen indgår i Uddannelsesstyrelsens håndbogsserie som nr. 2-2004.
- Danish Ministry of Education (2008a). Private Schools in Denmark. Online: http://www.eng.uvm.dk/~media/Files/English/Fact%20sheets/080101_fact_sheet_private_schools.ashx, accessed April 2011.
- Danish Ministry of Education (2008b). *The Democracy Canon*. Online: <http://pub.uvm.dk/2008/democracycanon/helepubl.pdf>, accessed April 2011.
- Danish Ministry of Education (2009). *Fælles Mål. Kristendomskundskab. Faghæfte 3*. Undervisningsministeriets håndbogsserie nr. 5 – 2009. Online: <http://www.uvm.dk/service/Publikationer/Publikationer/Folkeskolen/2009/Faelles%20Maal%202009%20-%20Kristendomskundskab.aspx>, accessed April 2011.
- Danish Ministry of Education (2010). Folkeskole (Consolidation) Act. Online: <http://pub.uvm.dk/2003/consolidation.html>, accessed April 2011.
- Department for Children, School and Families (2007). *In Guidance on the duty to promote community cohesion*. Online: <http://publications.teachernet.gov.uk/eOrderingDownload/DCSF-00598-2007.pdf>, accessed April 2011.
- Department for Education and Skills [DfES] (2006). *Making Sense of Citizenship: A continuing professional development handbook*. T. Huddleston & D. Kerr (eds.). London: Hodder Education.
- Department for Education and Skills (2001). *Schools Achieving Success*. DfES Publications. Online: <http://www.archive.official-documents.co.uk/document/cm52/5230/5230.pdf>, accessed April 2011.
- Driscoll, D. (2001). General conclusions. The concept of European identity. The European Identity (now and in the future): Colloquium in three parts (2001-2002). Online: http://www.coe.int/T/E/Com/Files/Themes/Identity/e_conclusion1.asp#TopOfPage, accessed May 2008.
- Dutch Inspectorate of Education (Onderwijsinspectie) (2003). *Islamitische scholen nader onderzocht* (Islamic schools revisited). The Hague.
- Dutch Ministry of Education and Science (Ministrie van Onderwijs en Wetenschappen) (1981). *Beleidsplan culturele minderheden in het onderwijs* (Policy Plan for Cultural Minority Groups in Education).
- Dutch Ministry of Justice (2004). Dutch Cabinet agrees to new integration system. The Hague: Dutch Ministry of Justice.
- Dutch News (2009). Sharia: government to act if Dutch law broken. 2 September 2009. Online:

- http://www.dutchnews.nl/news/archives/2009/09/sharia_government_to_act_if_du.php, accessed April 2011.
- The Economist* (2001). Connubial wrongs. 10 November 2001.
- European Court of Human Rights (1983). *Anna-Nina Angeloni v. Sweden* (ECtHR, App. No. 10491/83).
- European Court of Human Rights (1976). *Kjeldsen, Busk Madsen and Pedersen v. Denmark* (ECtHR, App. No. 5095/71; 5920/72; 5926/72).
- European Court of Human Rights (2007a). *Folgerø v. Norway* (ECtHR, App. No. 15472/02).
- European Court of Human Rights (2007b). *Zengin v. Turkey* (ECtHR, App. No. 1448/04).
- European Court of Justice (1969). Case 29/69 *Stauder v. City of Ulm*, 1969, E. C. R 419, par 7 at 425.
- European Union (1986). The Single European Act. 17 February 1986. Luxembourg.
- European Union (2002). Consolidated Version of the Treaty on European Union. Brussels.
- European Union (2007). Towards a Common Immigration Policy: Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. COM(2007) 780 final. 5 December. Brussels.
- European Union (2008). A common Immigration Policy for Europe: Principles, action and tools. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. COM(2008) 359 final. 17 June. Brussels.
- European Union (2004). Treaty of establishing a constitution for Europe. Online: http://www.unizar.es/euroconstitucion/library/constitution_29.10.04/part_I_EN.pdf, accessed April 2011.
- Eurostat (2010). *Europe in figures. Eurostat yearbook 2010*. European Commission. Online: http://epp.eurostat.ec.europa.eu/cache/ITY_OFFPUB/KS-CD-10-220/EN/KS-CD-10-220-EN.PDF, accessed April 2011.
- Gil-Robles, A. (2004). *Dialogue of the Council of Europe Commissioner for Human Rights with the Religious Communities*. Final report. Strasbourg: Council of Europe, Office of the Commissioner for Human Rights.
- Government of the Netherlands (2004a). Majority of ethnic-minority women disadvantaged. Online news. 29 January 2004. Online: http://www.government.nl/News/Press_releases_and_news_items/2004/January/Majority_of_ethnic_minority_women_disadvantaged, accessed April 2011.

- Government of the Netherlands (2004b). Shared values in spite of differences. Online news. 5 March 2004. Online:
http://www.government.nl/News/Press_releases_and_news_items/2004/March/_Shared_values_in_spite_of_differences, accessed April 2011.
- The Guardian* (2001). Blair puts his faith in religious partners. 30 March 2001. Online:
<http://www.guardian.co.uk/politics/2001/mar/30/uk.welfare>, accessed April 2011.
- The Guardian* (2005a). City schools could be front for evangelists. Fears grow over fundamentalism in new academies. 7 August 2005. Online:
<http://www.guardian.co.uk/uk/2005/aug/07/schools.newschools>, accessed April 2011.
- The Guardian* (2005b). Two thirds oppose state aided faith schools. 23 August 2007. Online:
<http://www.guardian.co.uk/uk/2005/aug/23/schools.faithschools>, accessed April 2011.
- The Guardian* (2005c). Full text of David Bell's speech. 17 January 2005. Online:
<http://www.guardian.co.uk/education/2005/jan/17/faithschools.schools>, accessed April 2011.
- The Guardian* (2005d). Minister urges greater tolerance from faith schools. 18 February 2005. Online:
<http://www.guardian.co.uk/education/2005/feb/18/schools.uk>, accessed April 2011.
- The Guardian* (2009). Balls orders Ofsted survey of faith schools' moral values. 9 March 2009. Online:
<http://www.guardian.co.uk/education/2009/mar/09/muslim-schools-ofsted-ed-balls>, accessed April 2011.
- Helsingin Sanomat* (2011). Sukupuolineutraali avioliittolaki vaikeuksissa eduskunnassa. 5 July 2011. Online:
<http://www.hs.fi/politiikka/artikkeli/Sukupuolineutraali+avioliittolaki+vaikeuksissa+eduskunnassa/1135267562439>
- Her Majesty's Government (1998). *The Government's Annual Report 97/98*. London: Victor Gollancz.
- Home Office (2001). *Community Cohesion: A Report of the Independent Review Team Chaired by Ted Cantle*. Online:
<http://image.guardian.co.uk/sysfiles/Guardian/documents/2001/12/11/communitycohesionreport.pdf>, accessed April 2011.
- Home Office (2002). *Secure Borders, Safe Haven: Integration with Diversity in Modern Britain*. Presented to Parliament by the Secretary of State for the Home Department by Command of Her Majesty February 2002. Online:
<http://www.privacyinternational.org/issues/terrorism/library/uksecureborders/safehavens.pdf>, accessed April 2011.

- Home Office (2005). *Improving Opportunity, Strengthening Society. The Government's strategy to increase race equality and community cohesion*. Online: <http://www.communities.gov.uk/documents/communities/pdf/152393.pdf>, accessed April 2011.
- House of Commons (2007). *Legislative Scrutiny: Sexual Orientation Regulations*. The Joint Committee on Human Rights. Independent Schools Council. Online: http://www.isc.co.uk/FactsFigures_PupilNumbers.htm, accessed May 2010.
- House of Commons Home Affairs Committee (2005). *Terrorism and Community Relations: The Government's Response*. Online: <http://www.official-documents.gov.uk/document/cm65/6593/6593.pdf>, accessed April 2011.
- Huddleston, T. & Kerr, D. (2006). *Making Sense of Citizenship: A continuing professional development handbook*. London: Hodder Education.
- Independent Schools Council (2011). *Facts and figures*. Online: http://www.isc.co.uk/FactsFigures_PupilNumbers.htm, accessed April 2011.
- Lagen.nu (2012): *Skollag (Education Act) (2010:800)*.
- Kamppinen, M. (2005). Uskonnonopetus väärällä polulla ('Religious education on the wrong path'). Op-ed column, *Helsingin Sanomat*. 12 April 2005.
- Komulainen, J. (2012). Globaali aika vaatii ajanmukaista oman uskonnon opetusta ('A global era requires up-to-date education in one's own religion'). Op-ed column, *Turun Sanomat*. 28 January 2012.
- Kristeligt Dagblad* (2009a). Regeringen vil øge kontrollen med religiøse skoler. 18 August 2009. Online: <http://www.kristeligt-dagblad.dk/artikel/334909:Danmark--Regeringen-vil-oege-kontrollen-med-religioese-skoler>, accessed April 2011.
- Kristeligt Dagblad* (2009b). Muslimer vrede over Bertel Haarders naziparallel. 27 August 2009. Online: <http://www.kristeligt-dagblad.dk/artikel/336085:Danmark--Muslimer-vrede-over-Bertel-Haarders-naziparallel?all=1>, accessed April 2011.
- Migration Policy Institute (2011). Official website. Online: <http://www.migrationpolicy.org/>, accessed April 2011.
- Minderhedennota* (Memorandum on minorities) (1983). Tweede Kamer der Staten-Generaal, 1982–83, 16 102, Nos. 20–21. Den Haag: Staatsuitgeverij.
- Ministry of Education and Science in Sweden (1985). *Education Act (1985:1100)*.
- The National Forum for Values in Education and the Community (1997). *Statement of values by the National Forum for Values in Education and the Community*. Online:

- http://curriculum.qcda.gov.uk/uploads/Statement-of-values_tcm812166.pdf?return=/key-stages-1-and-2/Values-aims-and-purposes/index.aspx%23page2_p#false, accessed October 2009.
- New York Times* (2004). 'President Bush benefits from efforts to build a coalition of religious voters'. 5 November 2004.
- Niessen, J. & Huddleston, T. (2009). *Handbook on Integration for policy-makers and practitioners*. 3 rd. edition. European Commission (Directorate General for Justice, Freedom and Security). Online: http://ec.europa.eu/ewsi/UDRW/images/items/doc1_12892_168517401.pdf, accessed January 2012.
- Ofsted (2009). *Independent faith schools*. October 2009. Online: <http://www.ofsted.gov.uk/Ofsted-home/Publications-and-research/Browse-all-by/Documents-by-type/Thematic-reports/Independent-faith-schools>, accessed April 2011.
- Onderwijsraad (2002). *Samen Leren Leven. Verkenning (Learning to live together. An Exploration)*. Online: <http://www.onderwijsraad.nl/upload/english/publications/advies-samenleren-leven-en.pdf>, accessed April 2011.
- Onderwijsraad (2003). *Onderwijs en integratie: leren van het verleren (Education and Citizenship)*. Online: <http://igitur-archive.library.uu.nl/ICO-ISOR/2005-1028-200034/boeksymp.pdf>, accessed April 2011.
- Onderwijsraad (2007). *A School Culture That Unites*. Online: http://www.onderwijsraad.nl/upload/english/publications/samenvatting_schoolcultuur_engels.pdf, accessed April 2011.
- OPSI (Office of Public Sector Information) (2010). Education Act 1996. http://www.opsi.gov.uk/ACTS/acts1996/ukpga_19960056_en_1, accessed May 2010.
- Politiken* (2009). Skoler skal undervise i danske værdier. De Konservative vil ramme arabisk-muslimske skoler ved at tvinge dem til at undervise i demokrati og danske værdier. 15 August 2009. Online: <http://politiken.dk/politik/article768923.ece>, accessed April 2011.
- QCA (1998). *Education for citizenship and the teaching of democracy in schools. Final report of the Advisory Group on citizenship 22 September 1998*.
- QCA & DfES (2001). *Citizenship. A scheme of work for key stage 3. Teachers Guide*. Online: http://www.standards.dfes.gov.uk/pdf/secondaryschemes/cit_guide.pdf, accessed September 2009.
- QCA & DfES (2004). *Religious Education: The non-statutory national framework*. Online: <http://www.mmiweb.org.uk/publications/re/NSNF.pdf>, accessed April 2011.

- QCDA (2010). *The National Curriculum for England*. Online: <http://curriculum.qcda.gov.uk/index.aspx>, accessed April 2010.
- Radio Netherlands Worldwide (2007). Is there such a thing as a Dutch identity? 8 October 2007. Online: <http://static.rnw.nl/migratie/www.radionetherlands.nl/currentaffairs/nl/071008mc-redirected>, accessed April 2011.
- Radio Netherlands Worldwide (2009). Islamic school to lose government funding. 27 August 2009. Online: <http://www.rnw.nl/english/article/islamic-school-lose-government-funding>, accessed April 2011.
- Regeringen (2003). *Regeringens visioner og strategier for bedre integration (The government's vision and strategies for improved integration)*. Online: http://www.nyidanmark.dk/bibliotek/publikationer/regeringsinitiativer/2003/regeringens_vision_og_strategier/vision_og_strategier/vision_og_strategier.pdf, accessed April 2011.
- Regeringen (2004). *Regeringens strategi mod gheittoisering (The government's strategy against ghettoisation)*. Online: <http://www.oem.dk/Publikationer/ghetto/ghettoisering.pdf>, accessed April 2011.
- Regjeringen (2010). Act relating to Primary and Secondary Education and Training (the Education Act). Online: http://www.regjeringen.no/upload/KD/Vedlegg/Grunnskole/Education_Act_Norway_september2010.pdf, accessed April 2011.
- Riksdagen (1974). The Constitution of Sweden.
- Riksdagen (1975). Regeringens Proposition (1975:26): *Regeringens proposition om riktlinjer för invandrar- och minoritetspolitiken m.m. (Government bill on guidelines for immigration and minority policy)*.
- Riksdagen (1986). Regeringens Proposition (1985/86:98): *Regeringens proposition om invandrarpolitiken (Government bill on immigration policy)*.
- Riksdagen (1991a). Regeringens proposition (1990/91:195): *Aktiv flyktning- och immigrationspolitik (Active refugee and immigration policy)*.
- Riksdagen (1991b). Regeringens proposition (1991/92:95): *Valfrihet och fristående skolor (Freedom of Choice and Independent Schools)*.
- Riksdagen (1996). Regeringens proposition 1996/97:3: *Kulturpolitik (Cultural policy)*.
- Riksdagen (1997). Regeringens proposition (1997/98:16): *Sverige, framtiden och mångfalden – från invandrarpolitik till integrationspolitik (Sweden, the future and diversity: from immigration policy to integration policy)*.
- Riksdagen (2008). Regeringens skrivelse (2008/09:24): *Egenmakt mot utanförskap – regeringens strategi för integration (Empowerment against exclusion: Governments strategy for integration)*.

- Riksdagen (2010). Regeringens proposition (2009/10:165): *Den nya skollagen – för kunskap, valfrihet och trygghet* (The new Education Act – for knowledge, freedom and security).
- Royal Ministry of Education, Research and Church Affairs (1997). *Core Curriculum For Primary, Secondary and Adult Education in Norway*.
- Royal Ministry of Education, Research and Church Affairs (2005). KRL-boka. Kristendoms-, religions- og livssynskunnskap. Læreplan for 1. – 10 årstrinn.
- Royal Ministry of Education, Research and Church Affairs (2008). Act of 17 July 1998 no. 61 relating to Primary and Secondary Education and Training (the Education Act). In force as of 1 January 2009.
- Runnymede Trust (2000). *The Future of Multi-Ethnic Britain: The Parekh report*. London: Profile Books.
- Schwimmer, W. (2001a). Opening speech. The concept of European identity. The European Identity (now and in the future): Colloquium in three parts (2001-2002). Online:
http://www.coe.int/T/E/Com/Files/Themes/Identity/e_disc_schwimmer.asp#TopOfPage, accessed May 2008.
- Schwimmer, W. (2001b). Opening speech. From cultural identities to a European political identity. The European Identity (now and in the future): Colloquium in three parts (2001-2002). Online:
http://www.coe.int/T/E/Com/Files/Themes/Identity/e_schwimmer2.asp#TopOfPage, accessed May 2008.
- Schwimmer, W. (2002). Key note speech. Europe tomorrow: shared fate or common political future? The European Identity (now and in the future): Colloquium in three parts (2001-2002). Online:
http://www.coe.int/T/E/Com/Files/Themes/Identity/summary.asp#P195_11442, accessed May 2008.
- Sisäasiainministeriö (2011). *Maahanmuuton vuosikatsaus 2010*. Sisäasiainministeriö. Maahanmuutto-osasto. Online:
<http://www.migri.fi/download.asp?id=Maahanmuuton+vuosikatsaus+2010;2104;{CCFF28DC-2F25-4A0E-8423-DA7263544964}>
- Statistics Finland (2012). Official Website. Online:
http://www.stat.fi/tup/suoluk/suoluk_vaesto_en.html#foreigners, accessed January 2012.
- Statline (2010). Official website. Online:
<http://statline.cbs.nl/StatWeb/publication/?VW=T&DM=SLEN&PA=37296eng&LA=EN>, accessed April 2011.
- SOU (Statens offentliga utredningar [Swedish Government Official Reports])1974:69. *Indvandrarerna och minoriteterna (Immigrants and minorities)*. Stockholm: Almänna Förlaget.

- SOU 1996:55. *Sverige framtiden och mångfalden (Sweden: future and diversity)*. Stockholm: Frizes.
- Sweden.se (2011). Official website of Sweden. Online: <http://www.sweden.se/eng/Home/Education/Basic-education/Reading/Free-schools/>, accessed April 2011.
- Swedish National Agency of Education (2006). *Curriculum for the compulsory school system, the pre-school class and the leisure-time centre Lpo 94*.
- Swedish National Agency of Education (2008). *Compulsory school. Syllabuses*.
- The Telegraph* (2007). Half of Muslim schools not inspected. 4 March 2007. Online: <http://www.telegraph.co.uk/news/uknews/1544519/Half-of-Muslim-schools-not-inspected.html>, accessed April 2011.
- Thijs, A., van Leeuwen, B. & Zandbergen, M. (2008). *The Development of Education: National report of the Netherlands by the Ministry of Education, Culture and Science*. Enschede: SLO.
- Thijs, A., van Leeuwen, B. & Zandbergen, M. (2009a). *Inclusive Education in the Netherlands*. Enschede: SLO.
- This, A., Langberg, M. & Berlet, I. (2009b). *Omgaan met culturele diversiteit. Aandachtspunten voor een kansrijke aanpak (Dealing with cultural diversity)*. Enschede: SLO.
- United Nations (1966a). International Covenant on Civil and Political Rights (ICCPR).
- United Nations (1966b). International Covenant on Economic, Social and Cultural Rights (ICESCR).
- United Nations (1989). Convention on the Rights of the Child.
- United Nations (1994). UN Human Rights Committee, General Comment No. 22(48), The Right to Freedom of Thought, Conscience, and Religion (Article 18).
- United Nations' Human Rights Committee (2004). *Leirvåg et al v. Norway*, Communication No. 1155/2003, adopted 23 November 2004. (CCPR/C/82/D/1155/2003).
- Uskonnonvapauslaki (Freedom of religion act) 2003/453. Online: <http://www.finlex.fi/fi/laki/ajantasa/2003/20030453>, accessed April 2011.
- Uusi Suomi* (2010). Kokoomus: "Avioliitto sukupuolineutraaliksi." 13 June 2010. Online: <http://www.uusisuomi.fi/kotimaa/94964-kokoomus-avioliitto-sukupuolineutraaliksi>", accessed July 2011.
- WWR (Wetenschappelijke Raad voor het Regeringsbeleid) (2007). *Identificatie met Nederland (Identification with the Netherlands)*. Online: <http://www.wrr.nl/content.jsp?objectid=4094>, accessed April 2011.

Literature

- Abbas, T. (2005). Recent developments to British multicultural theory, policy and practice: The case of British Muslims. *Citizenship Studies* 9(2), 153-166.
- Ackerman, B. (1980). *Social Justice in the Liberal State*. New Haven: Yale University Press.
- Alexander, J. (2001). Theorizing the “modes of incorporation”: Assimilation, hyphenation, and multiculturalism as varieties of civil participation. *Sociological Theory* 19(3), 237-249.
- Almen, E. (2000). Religious Education in Sweden. In E. Almen & H. C. Øster (eds.), *Religious Education in Sweden, Great Britain and Russia. Presentations, Problem Inventories and Commentaries. Text from the Peter Project*. Linköping Studies in Religion and Religious Education. Linköping University Electronic Press. Online: <http://www.ep.liu.se/ea/rel/2000/001/rel001-contents.pdf>, accessed April 2011.
- Anderson, B. (1991). *Imagined Communities*. London: Verso.
- Andrews, R. & Mycock, A. (2007). Citizenship education in the UK: Divergence within a multi-national state. *Citizenship Teaching and Learning* 3(1), 73-88.
- Angus, I. (2002). Cultural plurality and democracy. *International Journal of Canadian Studies* 25, 69-85.
- Anttonen, P. (1996). Nationalism in the face of national and transnational integration and European Union federalism. In J. Kervinen, A. Korhonen, & K. Virtanen (eds.), *Identities in Transition: Perspectives on cultural interaction and integration*, 67-85. Publications of the Doctoral Program on Cultural Interaction and Integration, University of Turku.
- Anttonen, P. (2005). *Tradition through Modernity: Postmodernism and the nation-state in folklore scholarship*. Studia Fennica Folkloristica 15. Helsinki: Finnish Literature Society.
- Anttonen, V. (2006). Kirkon paikka yhteiskunnassa: uskontoantropologinen näkökulma. In B. Yeung, H. Paasonen, & S. Sundback (eds.), *Rajojen ylityksiä: Uskonto, kirkko, sosiologia*, 97-107. Helsinki: Suomalainen teologinen kirjallisuusseura.
- Anttonen, V. (2000). The Sacred. In W. Braun & R. T. McCutcheon (eds.), *Guide to the Study of Religion*, 271-282. London: Cassell.
- Appiah, A. (1994). Identity, authenticity, survival: Multicultural societies and social reproduction. In A. Gutmann (ed.), *Multiculturalism: Examining the politics of recognition*, 149-164. Princeton NJ: Princeton University Press.
- Aristotle. *Nikomakhoksen etiikka (Ethica Nicomachea)*. Helsinki: Gaudeamus.
- Arribas-Ayllon, M. & Alkerdine, W. (2008). Foucauldian discourse analysis. In C. Willig & W. Stainton-Rogers (eds.), *The SAGE Handbook of Qualitative Research of Psychology*, 91-108. London: Sage Publications.

- Ash, A. (2004). Multi-ethnicity and the idea of Europe. *Theory, Culture & Society* 21(2), 1-24.
- Back, L., Michael, K., Khan, A., Shukura, K. & Solomos, J. (2002). New Labour's white heart: Politics, multiculturalism and the return of assimilation. *The Political Quarterly* 73(4), 445-454.
- Bailey, E. I. (1997). *Implicit Religion in Contemporary Society*. Leuven: Peeters.
- Barnes, L. P. & Wright, A. (2006). Romanticism, representations of religion and critical religious education. *British Journal of Religious Education* 28(1), 65-77.
- Barry, B. (2001). *Culture and Equality: An Egalitarian Critique of Multiculturalism*. Cambridge: Polity Press.
- Barth, F. (1998). *Ethnic Groups and Boundaries*. Long Grove: Waveland Press.
- Bauder, H. & Semmelroggen, J. (2009). Immigration and imagination of nationhood in the German parliament. *Nationalism and Ethnic Politics* 15(1), 1-26.
- Bauböck, R. (1998). The crossing and blurring of boundaries in international migration: Challenges for social and political Theory. In R. Bauböck & J. Rundell (eds.), *Blurred Boundaries: Migration, ethnicity, citizenship* 17-52. London: Ashgate.
- Bia, M. T. (2004). Towards an EU immigration policy: Between emerging supranational principles and national concerns. *European Diversity and Autonomy Papers*, EDAP 2/2004. Eurac Research.
- Bleich, E. (1998). From international ideas to domestic policies: Educational multiculturalism in England and France. *Comparative Politics* 31(1), 81-100.
- Boswell, C. (2005). Migration in Europe. Paper prepared for the Policy Analysis and Research Programme of the Global Commission on International Migration. September 2005. Global Commission on International Migration (GCIM). Online: <http://www.gcim.org/attachements/RS4.pdf>, accessed April 2011.
- Boyatzis, R. E. (1998). *Transforming qualitative information: Thematic analysis and code development*. Thousand Oaks CA: Sage Publications.
- Brubaker, R. (2001). The return of assimilation? Changing perspectives on immigration and its sequels in France, Germany, and the United States. *Ethnic and Racial Studies* 24(4), 531-548.
- Brubaker, R. & Cooper, F. (2000). Beyond "identity". *Theory and Society* 29(1), 1-47.
- Brubaker R., Loveman M. & Stamatov P. (2004). Ethnicity as cognition. *Theory and Society* 33(1), 31-64.
- Bruce, S. (1996). *From Cathedrals to Cults: Religion in the modern world*. Oxford: Oxford University Press.

- Brug, P. & Verkuyten, M. (2007). Dealing with cultural diversity: The endorsement of societal models among ethnic minority and majority youth in the Netherlands. *Youth and Society* 39(1), 112-131.
- Burtonwood, N. (2003). Social cohesion, autonomy and the liberal defense of faith schools. *Journal of Philosophy of Education* 37(3), 415-425.
- Callan, E. (1996). Political liberalism and political education. *Review of Politics* 58(1), 5-33.
- Cambridge Dictionary of Philosophy* (1999). 2nd edition. Robert Audi (ed.). Cambridge: Cambridge University Press.
- Casanova, J. (1994). *Public Religions in the Modern World*. Chicago: University of Chicago Press.
- Casanova, J. (2009). The religious situation in Europe. In H. Joas & K. Wiegandt (eds.), *Secularization and the World Religions*, 206-228. Liverpool: Liverpool University Press.
- Connor, W. (1993). Beyond reason: The nature of the ethnonational bond. *Ethnic and Racial Studies* 16(3), 373-389.
- Dahlström, C. (2004). Rhetoric, practice and dynamics of institutional change: Immigrant policy in Sweden, 1964-2000. *Scandinavian Political Studies* 27(3), 287-310.
- Davie, G. (2000). *Religion in Modern Europe: A memory mutates*. Oxford: Oxford University Press.
- Davie, G. (2006). Is Europe an exceptional case? *The Hedgehog Review: Critical reflections on contemporary culture* 8(1-2), 23-34.
- Davies, S. (1999). From moral duty to cultural rights: A case study of political framing in education. *Sociology of Education* 72(1), 1-21.
- De Jong, J. & Snik, G. (2002). Why should states fund denominational schools? *Journal of Philosophy of Education* 36(4), 573-587.
- Downie, R. S. (1988). On having a mind of one's own. In R. Straughan & J. Wilson (eds.), *Philosophers on Education*. Department of Educational Studies, University of Oxford. London: Macmillan Press.
- Draulans, V. & Halman, L. (2003). Religious and moral pluralism in contemporary Europe. In W. A. Arts, J. A. Hagenaars & L. Halman (eds.), *Cultural Diversity of European Unity: Findings, explanations and reflections from the European values study*, 371-400. Leiden: Brill.
- Driessen, G. & Merry, M. (2006). Islamic Schools in the Netherlands: Expansion or marginalization? *Interchange* 37(3), 201-223.
- Durkheim, E. (2001). *The Elementary Forms of the Religious Life*. Oxford: Oxford University Press.
- Dworkin, G. (1988). *The Theory and Practice of Autonomy*. Cambridge: Cambridge University Press.

- Enzinger, H. (2003). The rise and fall of multiculturalism: The case of the Netherlands. In C. Joppke & E. Morawska (eds.), *Toward Assimilation and Citizenship*, 59-86. New York: Palgrave MacMillan.
- Enzinger, H. (2006). Changing the rules while the game is on: From multiculturalism to assimilation in the Netherlands. In N. Bodemann & G. Yurdakul (eds.), *Migration, Citizenship, Ethnos*, 121-146. New York: Palgrave MacMillan
- Eurybase (2006/07). The Education system in the Netherlands 2006/07. Eurybase: The Information Database on Education Systems in Europe. European Commission. Directorate General for Education and Culture. Online: www.neac2.eu/documents/education_systems/NL_EN.pdf, accessed July 2012.
- Evans, C. (2008). Religious education in public schools: An international human rights perspective. *Human Rights Law Review*, 8(3), 449-473.
- Evans, M. (1996). Language of racism within contemporary Europe. In B. Jenkins B & S. A. Sofos (eds.), *Nation and Identity in Contemporary Europe*, 33-53. London: Routledge.
- Feinberg, W. (1995). Liberalism and the Aims of Multicultural Education. *Journal of Philosophy of Education* 29(1), 203-216.
- Fekete, L. (2004). Anti-Muslim racism and the European security state. *Race & Class* 46(1), 3-29.
- Fitzgerald, T. (2007a). Theology, religious studies and the secular academy: Rhetoric and the control of meanings. *Temenos: Nordic Journal of Comparative Religion* 43(2), 151-172.
- Fitzgerald, T. (2007b). Introduction. In T. Fitzgerald (ed.), *Religion and the Secular*, 1-24. Sheffield: Equinox.
- Fitzgerald, T. (2007c). *Discourse on Civility and Barbarity: A critical history of religion and related categories*. Oxford / New York: Oxford University Press.
- Frykman, J. (1995). The informalization of national identity. *Ethnologia Europaea* 25, 5-15.
- Galston, W. (1995). Two concepts of liberalism. *Ethics* 105(3), 516-534.
- Geertz, G. (1973). *The Interpretation of Cultures*. New York: Basic Books.
- Graham, M. (1999). *Classifications, Persons and Policies: Refugees and Swedish welfare bureaucracy*. PhD dissertation, Department of Social Anthropology, Stockholm University.
- Green A., Preston J. & Sabates, R. (2003). Education, equality and social cohesion: A distributional approach. *Compare* 33(4), 453-470.
- Gundem, B. & Karseth, B. (1998). Norwegian National Identity in Recent Curriculum Documents. Paper for Presentation at the Annual Meeting of American Educational Research Association, AERA April 12-18. 1998, San Diego. University of Oslo. Online:

http://www.eric.ed.gov/ERICDocs/data/ericdocs2sql/content_storage_01/0000019b/80/16/f7/52.pdf, accessed October 2009.

- Haas, C. (2008). Citizenship education in Denmark: Reinventing the nation and/or conducting multiculturalism(s)? *London Review of Education* 6(1), 59-69.
- Haberman, B. (1994). What is the content of education in a democratic society? *Journal of Philosophy of Education* 28(2), 183-189.
- Habermas, J. (1994). Struggles for recognition in the democratic constitutional state. In A. Gutmann (ed.), *Multiculturalism: Examining the politics of recognition*, 107-148. Princeton NJ: Princeton University Press.
- Habermas, J. (2002). *Religion and Rationality: Essays on reason, God and modernity*. Cambridge MA: MIT Press.
- Habermas, J. (2006). Religion in the public sphere. *European Journal of Philosophy* 14(1), 1-25.
- Hagesæther, G. & Sandsmark, S. (2006). Compulsory education in religion – the Norwegian case: An empirical evaluation of RE in Norwegian schools, with a focus on human rights. *British Journal of Religious Education* 28(3), 275-287.
- Halstead, M. (1986). *The Case for Muslim Voluntary-Aided Schools: Some philosophical reflections*. Cambridge: Islamic Academy.
- Halstead, M. (1995). Voluntary apartheid? Problems of schooling of religious and other minorities in democratic societies. *Journal of Philosophy of Education* 29(2), 257-272.
- Hand, M. (2002). Religious upbringing reconsidered. *Journal of Philosophy of Education* 36(4), 545-557.
- Hannerz, U. & Löfgren, O. (1992). Nationen I den globala byn (Nation in the global village). *Kulturella perspektiv* 1/1992, 21-29.
- Hansen, L-E. (2001): *Jämlikhet och valfrihet. En studie av den svenska invandrarpolitikens framväxt*. Stockholm: Almqvist & Wiksell International.
- Haydon, G. (1995). Thick or thin? The cognitive content of moral education in a plural democracy. *Journal of Moral Education* 24(1), 53-64.
- Hartmann, D. & Gerteis, J. (2005). Dealing with diversity: Mapping multiculturalism in sociological terms. *Sociological Theory* 23(2), 218-240.
- Hedetoft, U. (2006). Denmark: Integrating Immigrants into a Homogeneous Welfare State. Migration Policy Institute (MPI). <http://www.migrationinformation.org/Profiles/display.cfm?ID=485>, accessed April 2011.
- Hewer, C. (2003). Schools for Muslims. *Oxford Review of Education* 27(4), 515-527.
- Himanen, T. (2001). Religious groups' illegitimate demands on their children's education. Unpublished Licentiate Thesis, University of Turku.
- Hittinger, R. (1994). John Rawls, 'Political Liberalism'. *Review of Metaphysics: A*

- Philosophical Quarterly* 47(1), 585-602.
- Hobsbawm, E. J. (1990). *Nations and Nationalism since 1780: Programme, myth, reality*. Cambridge: Cambridge University Press.
- Holmes, D. R. (2000). *Integral Europe: Fast-capitalism, multiculturalism, neofascism*. Princeton NJ: Princeton University Press.
- Horwitz, M. J. (1982). The history of the public/private distinction. *University of Pennsylvania Law Review* 130(6), 1423-1428.
- Hudson, W. (1988). Two questions about religious education. In R. Straughan & J. Wilson (eds.), *Philosophers of Education*. Department of Educational Studies, University of Oxford.
- Hull, J. (2001). The contribution of Religious Education to Religious Freedom: A Global Perspective. In 1-8 IARF [International Association for Religious Freedom] (ed.), *Religious Education in Schools: Ideas & Experiences from around the World*. London. Online: <http://www.iarf.net/REBooklet/Hull.htm>, accessed September 2010.
- Inglehart, R. & Baker, W. E. (2000). Modernization, cultural change, and the persistence of traditional values. *American Sociological Review* 65, 19-51.
- Jackson, R. (2004a). *Rethinking Religious Education and Plurality: Issues in diversity and pedagogy*. London: Routledge.
- Jackson, R. (2004b). Editorial: Religious education and plurality in the common school. *British journal of Religious Education* 26(1), 3-6.
- Jackson, R. & O'Grady, K. (2007). Religions and education in England: Social plurality, civic religion and religious education pedagogy. In R. Jackson, S. Miedema, W. Weisse & J-P. Willaime (eds.), *Religion and Education in Europe: Developments, contexts and debates*, 181-202. Münster: Waxman.
- Janoski, T. & Hicks, A. M. (1994). *The Comparative Political Economy of the Welfare State*. Cambridge: Cambridge University Press.
- Joppke, C. (2004). The retreat of multiculturalisms in the liberal state: Theory and policy. *British Journal of Sociology* 55(2), 237-257.
- Joppke, C. & Morawska, E. (2003). Integrating immigrants in liberal nation-states: Policies and practices. In C. Joppke & E. Morawska (eds.), *Toward Assimilation and Citizenship: Immigrants in liberal nation-states*, 1-36. New York: Palgrave MacMillan.
- Kallioniemi, A. (2007). Eurooppalaiset uskonnonopetusmallit ja suomalainen malli ('European models of religious education and the Finnish model'). In T. Sakaranaho & A. Jamisto (eds.), *Monikulttuurisuus ja uudistuva katsomusaineiden opetus*, 101-113. Helsinki: Helsingin Yliopiston uskontotieteen laitos.
- Karsten, S. (2006). Freedom of education and common civic values. *European Education* 38(2), 23-35.

- Kaunismaa, P. (1997). Keitä me olemme? Kollektiivisen identiteetin käsitteellisistä lähtökohdista. ('Who are we? Conceptual starting points of collective identity'.) *Sociologia* 3/97, 220-230.
- Kay, W. (2000). Religious Education in Britain. In E. Almen & H. C. Øster (eds.), *Religious Education in Sweden, Great Britain and Russia. Presentations, Problem Inventories and Commentaries. Text from the Peter Project*. Linköping Studies in Religion and Religious Education. Linköping University Electronic Press. Online:<http://www.ep.liu.se/ea/rel/2000/001/rel001-contents.pdf>, accessed April 2011.
- Kilchsperger, J. R. (2007). Religious education in Switzerland. In E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner (eds.), *Religious Education in Europe: Situation and current trends in schools*, 199-206. Oslo: IKO Publishing House.
- Knott, K. (2005). *The Location of Religion: A spatial analysis*. London: Equinox Publishing.
- Knott, K. (2010). Theoretical and methodological resources for breaking open the secular and exploring the boundary between religion and non-religion. *Historia Religionum: An International Journal* 2/2010, 115-134.
- Knott, K. & Franks, M. (2007). Secular values and the location of religion: A spatial analysis of an English medical centre. *Health & Place* 13 (1), 224-237.
- Koopmans, R. (2003). Good intentions Sometimes Makes Bad Policy. A Comparison of Dutch and German Integration Policies. In *Migration, Multiculturalism, and Civil Society*. Friedrich Ebert Stiftung. Online: http://www.vu.nl/nl/Images/Koopmans-Good-intentions-sometimes-make-bad-policy_tcm9-36207.p, accessed November 2011.
- Koopmans, R. (2006). *Tradeoffs Between Equality and Difference: The crisis of Dutch multiculturalism in cross-national perspective*. Social Science Research Center Berlin (WZB).
- Koopmans, R., Statham, P., Giugni, M. & Passy, F. (2005). *Contested Citizenship: Immigration and cultural diversity in Europe*. Minneapolis: University of Minnesota Press.
- Korteweg, A. C. (2006). The construction of gendered citizenship at the welfare office: An ethnographic comparison of welfare-to-work workshops in the United States and the Netherlands. *Social Politics* 13(3), 314-340.
- Korteweg, A. C. (2008). National Identity Formation and the Integration of Muslim Immigrants in the Netherlands. Paper presented at the annual meeting of the American Sociological Association Annual Meeting, Sheraton Boston and the Boston Marriott Copley Place, Boston, MA, Jul 31, 2008. Online: http://www.allacademic.com/meta/p_mla_apa_research_citation/2/4/2/2/3/p242238_index.html, accessed February 2010.
- Kuyk, E. (2007). Religious education in the Netherlands. In E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner (eds.), *Religious Education in*

- Europe: Situation and current trends in schools*, 135-140. Oslo: IKO Publishing House.
- Kymlicka, W. (1995). *Multicultural Citizenship: A liberal theory of minority Rights*. Oxford: Clarendon Press.
- Kymlicka, W. (1989a). *Liberalism, Community, and Culture*. Oxford: Clarendon Press.
- Kymlicka, W. (1989b). Liberal individualism and liberal neutrality. *Ethics* 99(4), 883-905.
- Kymlicka, W. (1999a). Comments on Shackar and Spinner-Halev: An update from the multiculturalism wars. In C. Joppke & S. Lukes (eds.), *Multicultural Questions*, 112-129. Oxford / New York: Oxford University Press.
- Kymlicka, W. (1999b). Education for citizenship. In J. M. Halstead. & T. H. McLaughlin (eds.), *Education in Morality*, 79-102. London: Routledge.
- Laffan, B. (1996). The politics of identity and political order in Europe. *Journal of Common Market Studies* 34, 81-102.
- Lankshear, D. (2007). Religious education in England and Wales. In E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner (eds.), *Religious Education in Europe: Situation and current trends in schools*, 217-222. Oslo: IKO Publishing House.
- Larsson, R. (2007). Religious education in Sweden. In E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner (eds.), *Religious Education in Europe: Situation and current trends in schools*, 193-198. Oslo: IKO Publishing House.
- Leeman, Y. (2008). Education and diversity in the Netherlands. *European Educational Research Journal* 7(1), 50-59.
- Leeman, Y. & Ledoux G. (2003). Intercultural education in Dutch schools. *Curriculum Inquiry* 33(4), 385-399.
- Leeman, Y. & Pels, T. (2006). Citizenship education in the Dutch multiethnic context. *European Education* 38(2), 64-75.
- Leganger-Krogstad, H. (2007). Religious education in Norway. In E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner (eds.), *Religious Education in Europe: Situation and current trends in schools*, 141-148. Oslo: IKO Publishing House.
- Lehmann, D. (2006). Secularism and the public-private divide: Europe can learn from Latin America. *Political Theology* 7(3), 273-293.
- Lincoln, B. (2000). Culture. In W. Braun & R. T. McCutcheon (eds.), *Guide to the Study of Religion*, 409-422. London: Cassell.
- Louden, L. M. R. (2004). The conscience clause in religious education and collective worship: Conscientious objection or curriculum choice? *British Journal of Religious Education* 26(3), 273-284.

- Luckmann, T. (1967). *The Invisible Religion: The problem of religion in modern society*. New York: Macmillan.
- Luodeslampi, J. (2007). Religious education in Finland. In E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner (eds.), *Religious Education in Europe: Situation and current trends in schools*, 65-70. Oslo: IKO Publishing House.
- Macedo, S. (1995a). Multiculturalism for the religious right? Defending liberal civic education. *Journal of Philosophy of Education* 29(2), 223-238.
- Macedo, S. (1995b). Liberal civic education and religious fundamentalism: The case of God v. John Rawls. *Ethics* 105(3), 468-496.
- Mackenzie, J. (2004). Religious upbringing is not as Michal Hand describes. *Journal of Philosophy of Education* 38(1), 129-142.
- MacIntyre, A. (2004). *Hyveiden jäljillä: Moraaliteoreettinen tutkimus*. (Finnish translation of *After Virtue*, originally published 1981). Helsinki: Gaudeamus.
- MacNeill, D. (2000). Religious education and national identity. *Social Compass* 47(3), 343-351.
- Maréchal, B. (2003). Two modalities of Islamic instruction. In B. Maréchal, S. Allevi, F. Dassetto & J. Nielsen (eds.), *Muslims in the Enlarged Europe: Religion and Society*, 19-78. Leiden: Brill.
- Martin, G. (2009). On the origin of the 'private sphere': A discourse analysis of religion and politics from Luther to Locke. *Temenos: Nordic Journal of Comparative Religion* 45(2), 143-178.
- McLaughlin, T. (1984). Parental rights and the religious upbringing of children. *Journal of Philosophy of Education* 28(1), 75-83.
- McLaughlin, T. (1995). Liberalism, education and the common school. *Journal of Philosophy of Education* 29(2), 239-254.
- Milot, M. (2007). The religious dimension in multicultural education. In John Keast (ed.), *Religious Diversity and Intercultural Education: A reference book for schools*, 19-30. Strasbourg: Council of Europe Publishing.
- Miedena, S. (2007). Contexts, debates and perspectives of religion in education in Europe. In R. Jackson, S. Miedema, W. Weisse & J-P. Willaime (eds.), *Religion and Education in Europe: Developments, contexts and debates*, 267-283. Münster: Waxman.
- Mikkeli, H. (1998). Eurooppalainen identiteetti ja federalismi (European identity and federalism). In H. Mikkeli, J. Sihvola, P. Suvanto & O. Lyytinen (eds.), *Wesfalenista Amsterdamiin. Nykyaika – historia – EU*. Eurooppa-tiedotus & Oy Edita Ab. Online:
<http://www.eurooppatiedotus.fi/doc/fi/julkaisut/westfalen/index.html>, accessed January 2011.
- Modood, T. (1998). Anti-Essentialism, multiculturalism and the 'recognition' of religious groups. *Journal of Political Philosophy* 6(4), 378-399.

- Modood, T. (2003). Muslims and the politics of difference. *Political Quarterly* 74(1), 100-115.
- Monrad, M. K. (2007). Religious education in Denmark. In E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner (eds.) *Religious Education in Europe: Situation and current trends in schools*, 49-56. Oslo: IKO Publishing House.
- Mulhall, S. (1998). Political liberalism and civic education: The liberal state and its future citizens. *Journal of Philosophy of Education* 32(2), 161-176.
- Musterd, S., Ostendorf, W. & Breebaart, M. (1998). *Multi-Ethnic Metropolis: Patterns and policies*. AH Dordrecht: Kluwer Academic Publishers.
- Nielsen, J. S. (1995). *Muslims in Western Europe*. Edinburgh: Edinburgh University Press.
- Okin, S. M. & Reich, R. (1999). Families and schools as compensating agents in moral development for a multicultural society. *Journal of Moral Education* 28(3), 283-298.
- OSCE (2007). *Toledo Guiding Principles on Teaching About Religion and Beliefs in Public Schools*. Prepared by the ODIHR Advisory Council of Experts on Freedom of Religion or Belief. Online: http://www.osce.org/publications/odihr/2007/11/28314_993_en.pdf, accessed April 2011.
- Parekh, B. (2000). *Rethinking Multiculturalism: Cultural diversity and political theory*. Basingstoke: Palgrave Macmillan.
- Parsons, T. (1937). *The Structure of Social Action*. New York: McGraw-Hill.
- Plesner, I. T. (2004). Promoting tolerance through religious education. In T. Lindholm, W. C. Durham & B. G. Tahzib-Lie (eds.), *Facilitating Freedom of Religion or Belief: A deskbook*, 791-812. Leiden: Brill.
- Pollitt, H-E. (2007). Religious education in Austria. In E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner (eds.), *Religious Education in Europe: Situation and current trends in schools*, 17-22. Oslo: IKO Publishing House.
- Puolimatka, T. (1996). The Concept of indoctrination. *Philosophia Reformata* 61, 109-134.
- Pyysiäinen, I. (2002). Ontology of culture and the study of human behavior. *Journal of Cognition and Culture* 2(3), 167-182.
- Rawls, J. (1993). *Political Liberalism*. New York: Columbia University Press.
- Religion and Education in Europe: Developments, Contexts and Debates*. (2007). R. Jackson, S. Miedema, W. Weisse & J-P. Willaime (eds.). Münster: Waxman.
- Religious Education in Europe: Situation and current trends in schools* (2007). E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner (eds.). Oslo: IKO Publishing House.

- Robertson, R. (1990). After nostalgia? Wilful nostalgia and the phases of globalization. In: *Theories of Modernity and Postmodernity*. Turner, B. S. (ed.). London: SAGE Publications.
- Räikkä, J. (1998). *Moraalin kanssa: Esseitä hyvästä yhteiskunnasta (With morality: Essays on a good society)*. Kuopio: Kustannusosakeyhtiö Puijo.
- Sakaranaho, T. (2006). *Religious Freedom, Multiculturalism, Islam: Cross-reading Finland and Ireland*. Muslim Minorities, Volume 6. Leiden: Brill.
- Saler, B. (2000). *Conceptualizing Religion: Immanent Anthropologists, Transcendent Natives, and Unbounded Categories*. Leiden: Brill.
- Sandel, M. J. (1982). *Liberalism and the Limits of Justice*. Cambridge: Cambridge University Press.
- Scheinin, M. (2004). The Human Rights Committee and freedom of religion or belief. In T. Lindholm, W. C. Durham & B. G. Tahzib-Lie (eds.), *Facilitating Freedom of Religion or Belief: A deskbook*, 189-202. Leiden: Brill.
- Schlesinger, P. (1994). Europeanness: A new cultural battlefield? In J. Hutchinson & A. D. Smith (eds.), *Nationalism*, 316-325. Oxford: Oxford University Press.
- Schreiner, P. (2007a). Religious education in the European context. In E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner, P. (eds.), *Religious Education in Europe: Situation and current trends in schools*, 9-16. Oslo: IKO Publishing House.
- Schreiner, P. (2007b). Religious education in Germany. In E. Kuyk, R. Jensen, D. Lankshear, E. Löh Manna & P. Schreiner, P. (eds.), *Religious Education in Europe: Situation and current trends in schools*, 81-89. Oslo: IKO Publishing House.
- Seppo, J. (2003). *Uskonnonvapaus 2000-luvun Suomessa (Freedom of religion in Finland in the twenty-first century)*. Helsinki: Edita.
- Shahid, W. A. & van Koningsveld, P. S. (2006). Islamic religious education in the Netherlands. *European Education* 38(2), 76-88.
- Sheridan, L. (2002): Discrimination and racism, post September. An overview of a report entitled: Effects of the Events of September 11th 2002 on Discrimination and Implicit Racism in Five Religious and Seven Ethnic Groups. University of Leicester.
Online:<http://www.le.ac.uk/press/press/discriminationandracism.html>, accessed January 2012.
- Short, G. (2002). Faith Based Schools: A threat to social cohesion? *Journal of Philosophy of Education* 36(4), 559-572.
- Short, G. (2003). Faith schools and social cohesion: Opening up the debate. *British Journal of Philosophy of Education* 25(2), 129-141.
- Short, G. & Lenga, R-A. (2002). Jewish primary schools in a multicultural society: Responding to diversity. *Journal of Beliefs and Values* 23(1), 43-54.

- Shweder, R. A. (1991). *Thinking Thorough Cultures: Expeditions in cultural psychology*. Cambridge MA: Harvard University Press.
- Skeie, G. (2006a). Diversity and the political function of religious education. *British Journal of Religious Education* 28(1), 19-32.
- Skeie, G. (2006b). Plurality and Pluralism in Religious Education. In M. De Souza, G. Durka, K. Engebretson, R. Jackson & A. McGrady (eds.), *International Handbook of the Religious, Moral and Spiritual Dimensions in Education*, Vol. 1, 307-320. AA Dordrecht: Springer.
- Smith, A. D. (1993). *National Identity*. Reno: University of Nevada Press.
- Smith, J. Z. (2004). *Relating Religion: Essays in the study of religion*. Chicago: University of Chicago Press.
- Soininen, M. (1999). The 'Swedish model' as an institutional framework for immigrant membership rights. *Journal of Ethnic and Migration Studies*, 25(4) 685-702.
- Somerville, W., Srisandarajah, D., Latorre, M. (2009). United Kingdom: A Reluctant Country of Immigration. Migration policy Institute. Online: <http://www.migrationinformation.org/Profiles/display.cfm?ID=736>, accessed April 2011.
- Soysal, Y. N. (1994). *Limits of Citizenship: Migrants and postnational membership in Europe*. Chicago: University of Chicago Press.
- Spiecker, B. & Steutel, J. (2001). Multiculturalism, pillarization and liberal civic education in the Netherlands. *International Journal of Educational Research* 35(3), 293-304.
- Spinner-Halevy, J. (2005). Hinduism, Christianity and liberal religious tolerance. *Political Theory* 33(1), 28-57.
- Starkey, H. (2000). Citizenship Education in France and Britain: Evolving theories and practices. *The Curriculum Journal* 11(1), 39-54.
- Steutel, J. & Spiecker, B. (1999). Family education, state intervention and political liberalism. *Journal of Philosophy of Education* 33(3), 371-386.
- Strike, K. (1998). Freedom of conscience and illiberal socialization: The congruence argument. *Journal of Philosophy of Education* 32(3), 345-360.
- Suárez-Orozco, C. & Suárez-Orozco, M. (2001). *Children of Immigration*. Cambridge MA: Harvard University Press.
- Svensson, F. (1976). Liberal Democracy and Group Rights: The Legacy of Individualism and its Impact on American Indian Tribes. *Political Studies* 27.
- Tamir, Y. (1995). Two concepts of multiculturalism. *Journal of Philosophy of Education* 29(2), 161-172.
- Tan, C. (2004). Michael Hand, indoctrination and the inculcation of belief. *Journal of Philosophy of Education* 38(2), 257-267.

- Taylor, C. (1992). The Politics of recognition. In A. Gutmann (ed.), *Multiculturalism and "The Politics of Recognition"*, 25-74. Princeton NJ: Princeton University Press.
- Taylor, C. (2002). *Varieties of Religion Today*. Cambridge MA: Harvard University Press.
- Taylor, C. (2007). *A Secular Age*. Cambridge MA: Belknap Press.
- Telhaug, A. O., Mediås, O. A. & Aasen, P. (2004). From collectivism to individualism? Education as nation building in a Scandinavian perspective. *Scandinavian Journal of Educational Research* 48(2), 141-158.
- Thorseth, M. (1999). *Legitimate and Illegitimate Paternalism in Polyethnic Conflicts*. Ph.D. Dissertation. Göteborg: Acta Universitatis Gothenburgensis.
- Triandafyllidou, A. (1998). National Identity and the 'other'. *Ethnic and Racial Studies* 21(4), 593-612.
- Toggenburg, G. N. (2004). The debate on European values and the case of cultural diversity. *European Diversity and Autonomy Papers*, EDAP 1/2004. Eurac Research.
- Tomasi, J. (1995). Kymlicka, liberalism, and respect for cultural minorities. *Ethics* 105(3), 580-603.
- Triandis, H. C. (1990). Cross-cultural studies on individualism and collectivism. In R. A. Dienstbier & J. J. Berman (eds.), *Nebraska Symposium on Motivation 1989: Cross-Cultural Perspectives*, 41-132. Lincoln: University of Nebraska Press.
- Turner, B. S. (2011). *Religion and Modern Society: Citizenship, secularisation and the state*. Cambridge: Cambridge University Press.
- Van der Ploeg, P. (1998). Minority rights and educational authority. *Journal of Philosophy of Education* 32(2), 177-193.
- Van Dijk, T. (1997). What is political discourse analysis? *Belgian Journal of Linguistics* 11 (*Political Linguistics*), 11-52.
- Van Selm, J. (2005). The Netherlands: Death of a Filmmaker Shakes a Nation. Migration Policy Institute. Online: <http://www.migrationinformation.org/Profiles/display.cfm?ID=341>, accessed April 2011.
- Vasta, E. (2007). From ethnic minorities to ethnic majority policy: Multiculturalism and the shift to assimilationism in the Netherlands. *Ethnic and Racial Studies* 30(5), 713-740.
- Vermeulen, H. & Penninx, R. (2000). Introduction. In H. Vermeulen & R. Penninx (eds.), *Immigrant Integration: The Dutch Case*, 1-35. Amsterdam: Het Spinhuis.
- von Wright, G. H. (1971). *Explanation and Understanding*. Ithaca: Cornell University Press.

- Walford, G. (2001). Funding for religious schools in England and the Netherlands: Can the piper call the tune? *Research Papers in Education* 16(4), 359-380.
- Walford, G. (2003). Separate schools for religious minorities in England and the Netherlands: using a framework for the comparison and evaluation of policy. *Research Papers in Education* 18(3), 281-299.
- Westheimer, J. & Kahne, J. (2004). What kind of citizen? The politics of educating for democracy. *American Educational Research Journal* 41(2), 237-269.
- Westin, C. (2006). Sweden: Restrictive Immigration Policy and Multiculturalism. Migration Policy Institute. Online: <http://www.migrationinformation.org/Profiles/display.cfm?ID=406>, accessed April 2011.
- Willaime, J-P. (2007). Different models for religion and education in Europe. In R. Jackson, S. Miedema, W. Weisse & J-P. Willaime (eds.), *Religion and Education in Europe: Developments, contexts and debates*, 57-66. Münster: Waxman.
- Williams, M. S. (2003). Citizenship as identity, citizenship as shared fate, and the functions of multicultural education. In K. McDonough & W. Feinberg (eds.), *Citizenship and Education in Liberal-Democratic Societies: Teaching for cosmopolitan values and identities*, 208-248. Oxford: Oxford University Press.
- Wimberley, J. (2003). Education for intercultural and interfaith dialogue: A new initiative by the Council of Europe. *Prospects* 33(2), 199-209.
- Wooffit, R. (2005). *Conversation Analysis and Discourse Analysis: A comparative and critical introduction*. London: Sage Publications.
- Wright, A. (2004). The justification of compulsory religious education: A response to Professor White. *British Journal of Religious Education* 26(2), 165-174.
- Young, I. (1990). *Justice and the Politics of Difference*. Princeton NJ: Princeton University Press.