

## Religious Education as Small ‘i’ Indoctrination: How European Countries Struggle with a Secular Approach to Religion in Schools

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☞ This article critically reviews the European religious education landscape and argues that a religious notion of religion prevails in most models, not only in confessional RE but also in integrative models and even in so-called alternative subjects that are compulsory for pupils who do not take part in confessional RE. Thus, schools in Europe provide hardly any chance for pupils to acquire a secular perspective on religion and religious diversity, based on a non-theological study of religion. Furthermore, the explicitly or implicitly religious character, particularly of integrative approaches or obligatory alternative subjects to confessional RE, is frequently hidden or played down. Building on analyses of separative (Germany) and integrative (Norway, England) models of RE, the article argues that carefully distinguishing between religious and secular approaches to religion in school is a serious human right's issue, not least because only secular approaches may be compulsory. The predominant religious framing of religion – that is always linked to confirming the exceptional position of Christianity among the religions in RE – in combination with an actual lack of secular alternatives creates a climate of what may be called ‘small ‘i’ indoctrination’, i.e., an unquestioned discursive hegemony of a particular (Christian) notion of religion as a frame of reference for almost all education about religion, which is, furthermore, often represented as if it constituted not a particular religious view of religion, but a kind of universal perspective on religion. This results in highly problematic conceptualisations, both of religion in general and individual religions – most visibly in stereotyping ‘other’ religions, that are not complemented with an unbiased secular perspective. Thus, the subject matter religion is widely exempted from the secular approach to education in European schools, while a particular religious perspective on religion is promoted, even in models that are designed for all pupils of a religiously heterogeneous class.

**Keywords:** religious education, Europe, small ‘i’ indoctrination, Germany, Norway, England

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## Religijsko izobraževanje kot indoktrinacija z malim 'i': kako se evropske države spoprijemajo s sekularnim pristopom k religijskemu izobraževanju

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☞ Prispevek kritično oceni področje evropskega religijskega izobraževanja. V njem opozarjamo, da religijsko pojmovanje religije prevladuje v večini modelov, ne le v konfesionalnem religijskem izobraževanju, ampak tudi v integrativnih modelih in celo v t. i. alternativnih predmetih, ki so obvezni za učence, ki se ne udeležujejo konfesionalnega religijskega izobraževanja (verouka). Javne šole v Evropi učencem izjemno redko predstavljajo laično perspektivo o religiji in religijski raznolikosti, ki bi temeljila na neteološkem preučevanju religije. Poleg tega pa je eksplicitno ali implicitno religiozen značaj še zlasti integrativnih pristopov ali obveznih alternativnih predmetov verouku pogosto skrit ali pa je pomen tega minimaliziran. V prispevku s pomočjo analize separativnega (Nemčija) in integrativnega (Norveška, Anglija) modela religijskega izobraževanja pokažemo, da je skrbno razlikovanje med religioznim in laičnim pristopom k religiji v šolah resno vprašanje človekovih pravic in da so lahko za učence obvezni le predmeti o religijah, ki temeljijo na laičnih pristopih. Prevladujoče religiozno uokvirjanje religije – ki je vedno povezano z izpostavljanjem izjemnega položaja krščanstva med religijami, obravnavanimi v religijskem izobraževanju – v kombinaciji z dejanskim pomanjkanjem laičnih alternativ ustvarja klimo, ki bi jo lahko poimenovali kot indoktrinacija z malim 'i' – tj. nevprašljiva diskurzivna hegemonija določenega (krščanskega) pojmovanja religije kot referenčnega okvira za skoraj celotno izobraževanje o religijah, ki se pogosto predstavlja kot nekakšna univerzalna perspektiva, ne pa specifičen religiozen pogled na religijo. Posledice tega so vidne v zelo problematičnih konceptualizacijah religije na splošno in konkretnih posameznih religij, najočitneje pri stereotipiziranju »drugih« religij, ki niso obravnavane tudi z nepristranske laične perspektive. Tako je religija kot šolski predmet v evropskih šolah skoraj popolnoma izvzeta iz siceršnjega laičnega pristopa k izobraževanju, namesto tega pa se spodbuja posebna religiozna perspektiva religije, ki prevladuje celo pri predmetih, ki so namenjeni vsem učencem religijsko heterogenih razredov.

**Ključne besede:** religijsko izobraževanje, Evropa, indoktrinacija z malim 'i', Nemčija, Norveška, Anglija

## Introduction: ‘Religious education’ and religious education research

At a European level, religious education (RE) research is frequently represented as a research *discipline*. Despite a number of differences, which in itself are a popular object of discussion, many scholars conceptualise one ‘field’ of religious education for which a large group of scholars – educationalists of religion – are specialists. Moreover, common aims and challenges of RE are frequently discussed.<sup>2</sup>

At first glance, this certainly makes sense: scholars from Europe – and beyond – who are in one way or another involved in RE co-operate, not least with respect for the great challenges of our time, in order to better understand and improve RE. Looking at the variety of what is commonly conceptualised as RE, I have become very sceptical, however, of the usefulness of constructing RE *in general* as a somewhat uniform field of study, and, furthermore, as a kind of research discipline. The frequent discourse about *RE in general* blurs necessary distinctions. The fact that all models of RE somehow relate to some not-further-specified object called ‘religion’ does not make them a meaningful field, neither in school education nor in related teacher training programmes or university disciplines. The fundamental epistemological differences, for example, between the research traditions and presuppositions of the secular Study of Religion and theologies, cannot be harmonised in some religious education research discipline. Similarly, at the school level, very different and often contradictory, if not mutually exclusive religious and non-religious ways of relating to religion cannot be meaningfully conceptualised as a single ‘field’.

It completely makes sense to discuss all kinds of topics related to RE in schools, including religious, interreligious and non-religious approaches, in a non-confessional academic fashion at a conference, comparable to other thematic conferences in the Study of Religion, Anthropology or Sociology, where religion is discussed in a scientific, non-religious way. It also makes sense if religious bodies who would like to improve their own approaches to religion and their communication in educational contexts come together and discuss that. However, these are two very different matters. This is comparable to a conference in political studies and a conference of political parties that are trying to promote their impact and agendas on a particular issue. I am not saying that it is not interesting to each of those to look at what the others are doing, but I

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2 For a recent overview of RE and RE research in Europe see, for example, Jackson 2016 and the Vienna University Press book series on Religious Education at Schools in Europe (e.g., Rothgangel et al., 2016).

think it is dangerous to blur the borders between those two and to try to unite their very different presuppositions and interests in public state schools. Not least in a context in which religious freedom, including the right to freedom from religion, i.e., the right not to profess any religion, is to be respected.

The otherwise generally acknowledged distinction between theologies, interfaith activities, and the secular Study of Religion is frequently not respected when it comes to RE issues. In this article, I will show what kind of problems, contradictions and not least human rights issues emerge when the totally different character and interests of these approaches are ignored. My argument will include examples from Germany, Norway and England.

### **Learning about religion in schools in Europe**

There are many attempts to map the complex situation of religion-related education in schools in Europe. With respect to learning about religion and religious diversity, we find different categorisations of the frameworks in which this kind of learning takes place.

A significant distinction is between *confessional* and *non-confessional* models, which differ considerably with respect to their contents, organisation, and perspectives on religion and religious diversity. In *confessional* models, religion – first of all, one's own religion, assuming a somewhat religiously homogeneous group of pupils, but normally also religious diversity – is studied from an explicitly religious perspective, using the epistemologies of particular religious traditions as a general framework for approaching religion. *Non-confessional* models, by contrast, attempt to frame education about religion/s – in these models with a clear focus on religious diversity – independent of particular religious positions. This may be an explicitly non-religious, i.e., secular approach to religion, regarding religion as a 'normal' subject matter in a secular school. However, this is, surprisingly, not always the case. In clear contradistinction to a secular approach to religion, 'interfaith', 'multifaith' or so-called 'dialogical' models have been established that attempt to study religion not from a secular perspective but combine the approaches of different religious communities to some joint interreligious approach.

The different motivations behind different approaches to RE in Europe are often distinguished as 1) *education into religion* ('learning religion'), 2) *education about religion/s* ('learning about religion/s'), and 3) *education from religion* ('learning from religion'), frequently with reference to Grimmitt (e.g., 2000). The first of these three quite clearly describes a religious framework (i.e., the initiation into a particular religious tradition), while the second is often

used to describe a secular framework where knowledge about religion (which is not in itself religious) is communicated in a secular manner. The third is ambiguous. It may be meant to express some general educational insights and competences that build on the *study* of religion/s, but often presupposes some kind of moral superiority of religion in general or of individual religious traditions, including the idea that aspects of these traditions are advisable to be integrated into the pupils' own set of values. This raises the question of what 'good' or 'right' religion is and if there is something to religion that secular worldviews lack.

Making the general organisation of RE the starting point, I have distinguished between *integrative* and *separative* approaches to education about religion/s in school (Alberts, 2007); the former refers to education about religion with the same composition of pupils as in any other subject, i.e., for the whole class together, while the latter refers to models in which the class (in one way or another) is separated when it comes to education about religion. Both of these categories, however, contain different approaches in different contexts. *Separative* approaches regularly include confessional subjects for particular religious traditions in order to take account of the pupils' religious backgrounds, and, frequently, also non-confessional 'alternative subjects' for pupils who – or whose parents for them – choose not to take part in confessional RE. The number of alternatives offered within separative approaches varies considerably, from one to a small variety, trying to accommodate as many religious traditions as possible. It is obvious, however, that the separative model has its limits in terms of the number of confessional subjects that may be organised.<sup>3</sup>

However, *integrative* approaches also vary considerably in terms of organisational issues. Some models, despite their integrative aspirations are not compulsory and, therefore, not truly integrative in practice. Compulsory integrative RE in European secular states may be regarded as an indicator for the attempt to establish a secular (in contradistinction to a confessional or inter-religious) approach, as this is a legal prerequisite laid down in European human rights legislation. However, close analyses of seemingly non-confessional approaches frequently also bear witness of what has been called 'small 'c' confessional' (i.e., implicitly, or not at first glance visible confessional) remains, not least with respect to the general framing of religion and individual religions.<sup>4</sup>

Each of the different ways of categorising approaches to learning about religions in schools in Europe highlights some basic distinctions, but also

3 For details on individual countries see, for example, the respective chapters in Rothgangel et al., 2016.

4 Cf. Jensen and Kjeldsen (2013) on 'small 'c' confessional' RE in Denmark, Andreassen, 2014 on Norway, Berglund, 2013 on Sweden and Frank, 2010 on Switzerland.

aspects and nuances within the models. However, they also show how controversial the representation of religion/s in schools is and that this is not a straight forward issue. The complexity of the matter, however, shall not mystify the fact that (despite different degrees of correspondence between ideal and practice) the distinction between a (in one way or another) religious approach and an approach that at least aims at conceptualising religion in a non-religious way is the striking difference between approaches. This becomes obvious in the human rights' issue, where the decisive question is whether pupils can be forced to attend a particular kind of religious education or not.

### **One religious perspective on religion is sufficient – partiality as the norm: Germany (the separative model)**

The general separative framework, which is the norm in most of the 16 federal states of Germany, is perhaps best understood with reference to the apparent plausibility that the so-called *Böckenförde-dilemma* met with in post-war West Germany after the terror of the Nazi regime, when the legal framework for the country in ruins was established. This kind of climate is expressed, for example, in the preamble of the constitution of the Free State of Bavaria (of 1946), which reads:

[I]n the face of the scene of devastation into which the survivors of the 2nd World War were led by a godless state and social order which lacked any conscience and respect for human dignity, with the firm intention of permanently securing for the future generations the blessings of peace, humanity and justice and mindful of its history of more than a thousand years, the Bavarian people herewith bestows upon itself the following Democratic Constitution. (Free State of Bavaria, 2014, official translation)

Ernst-Wolfgang Böckenförde, a judge at Germany's Federal Constitutional Court held that 'The liberal secularized state lives by prerequisites which it cannot guarantee itself' (1976, p. 60). This has often been interpreted as an argument for confessional religious education in schools, with the idea that the production of ethics and the task of making pupils moral beings is best transferred to religious communities. In this spirit, the old separative confessional model of RE from the *Weimar constitution* of 1919 was taken over into the new constitution of 1949 (*Grundgesetz*).

Article 7.3 of the constitution says that religious education is taught ‘in accordance with the basic teachings of the religious communities’. This has generally been interpreted as the legal basis for a separative confessional model. After the fall of the Berlin Wall and in the course of German reunification, the RE issue became a matter of discussion again and the question arose which approach the ‘new’ Eastern federal states should follow, considering that they had a highly secular population with no established RE in schools in GDR times. On a legal level, it was negotiated if the so-called *Bremen clause* of the constitution (art. 141), which says that article 7.3 does not apply to federal states that already had other regulations by January 1, 1949, also applies to the Eastern federal states or not.<sup>5</sup> Leaving aside the highly interesting but very complex legal subtleties, it may be summarised that (apart from a few but critical exceptions<sup>6</sup>) most German federal states today still follow the separative model with different types of confessional RE and obligatory alternative subjects for those pupils who do not take part in confessional RE.

The German classical separative model includes Protestant and Catholic RE, while the opportunity for a few more religious communities to provide RE is offered in many states, recently, above all, including Islamic RE. If one recalls the function that RE was supposed to serve in post-war West Germany, it was, from the 1980s onwards, regarded as a problem that more and more pupils opted out of confessional religious education. Within the logic of RE that I have sketched above, this meant that growing numbers of pupils were not taught in schools how to be a moral person. If religious education was simply a religious offer made possible by the state for those who wish to take part in it, there would have been no problem if pupils exercised their right to ‘freedom from religion’, an essential aspect of human rights legislation. If, however, ethical education is completely ‘out-sourced’ to RE within the responsibility of religious communities, the question arises how children who do not take part

5 Bremen had, as stated in its constitution of 1947, introduced ‘not confessionally bound education in biblical history on a general Christian basis’ (cf. Freie Hansestadt Bremen, 2014, art 32, translation WA).

6 Apart from Bremen, the exceptions mainly include the subject *Lebensgestaltung Ethik Religionskunde* (shaping life, ethics, knowledge about religion, LER) in Brandenburg and the obligatory integrative subject *ethics* in Berlin, where RE (offered by a number of religious communities and the Humanist Association) is a completely voluntary subject. For a detailed discussion of the legal aspects and the social debates around these issues in Berlin and Brandenburg, see Reuter 2014. Hamburg is another particular case where Art. 7.3. of the basic law is interpreted in favour of a multi-confessional dialogical RE that is organised under the responsibility of the Protestant Church. Even though the advocates of this approach call it ‘RE for all’, it operates within the confessional (though now multi-confessional) paradigm and, therefore, just as the ‘not confessionally bound’ but still generally Christian-based Bremen model, cannot be obligatory and deviates, in many important respects, from a secular model in which religion is not generally framed religiously.

in that learn how to behave ethically. Following that logic, obligatory alternative subjects to RE had to be established in order to ensure the moral education of all citizens. The names of these obligatory alternative subjects, such as 'ethics' or 'values and norms', reflect that intention. Thus, there is a clear task for these subjects, regardless of whether they are confessional or secular alternatives: they are there for making the pupils moral people, either by way of religion or by way of secular ethics. The latter, however, may be regarded as contradicting Böckenförde's famous phrase quoted above, as the question arises of who, if not religious bodies, is in a position to produce the value foundation that the liberal democratic state, according to Böckenförde, is not able to produce itself. The degree to which education authorities are presently struggling with these alternative subjects, in particular with the parts that relate to religion or religious diversity, shows that the issue of integrating a secular perspective on religion in school curricula in Germany is far from resolved.

An analysis of the notion of religion in the curricula for the obligatory alternative subjects to confessional RE shows the ambivalence towards religion that is inherent in the design of these subjects. A closer look at the curriculum for *values and norms* (Werte und Normen) in Lower Saxony may demonstrate that. The first contradiction arises when the subject is, on the very first page of the curriculum, directly and explicitly related to § 2 of the School Act, which states that the school should contribute to developing 'the personality of the pupils *on the basis of Christianity*, European humanism and the ideas of the liberal, democratic and social freedom-movements' (NSchG, translation and emphasis WA), while at the same time acknowledging that education in *values and norms* requires that the subject is neutral with respect to religion and worldviews (NKM, 2017, p. 6). How can one have neutrality based on Christianity? The whole curriculum is an expression of the ambivalence between the obvious relation of this subject to Christian confessional RE and some kind of attempt to achieve the same aims in a non-confessional way. This results in what Jensen and Kjeldsen (2013) have called 'small 'c' confessional' RE, nominally non-confessional RE in which the confessional character is hidden but nevertheless there.

The notion of religion in a confessional setting is rather clear: (right) religion is something good and valuable that helps pupils to become moral people. This notion of religion, however, is confessional. It is a particular religious view of religion that cannot be transferred to non-confessional contexts. However, the same view of religion permeates the curriculum of values and norms, with a clear preference for Christian interpretations, topics and terminology, but also with a declared intent to do justice to the diversity of religions and



worldviews. The internal contradiction of this approach to religion becomes obvious in a sentence like the following: 'Education in the subject values and norms helps to reflect the different orientations with the intention to differentiate between them with respect to their plausibility, their social reasonability and their potential for [providing] meaning' (NKM, 2017, p. 6, translation WA).

First, religions are, in the whole curriculum, mainly reduced to sources of orientation. This is, of course, a very particular and narrow conception of religion that only highlights one (generally conceived of as positive) aspect of religion. Not the empirical diversity and ambivalence of religion is the starting point but one particular way of instrumentalising 'religion', in a particularly constructed sense. Referring to the quote above, it may be asked from which perspective it is possible in a non-confessional context to judge orientations with respect to plausibility, social responsibility and meaning-making potential. Considering the diversity of religions and world views, it is more than evident that precisely the issue of what is plausible, socially responsible and, perhaps, appealing with respect to giving meaning is being negotiated if not even fought about, within, and between religious and secular traditions. Rather than trying to judge traditions, studying and analysing the strategies of how these aspects are negotiated in various areas of society would be a starting point for a discursive non-confessional approach. This is, however, virtually absent from the values-and-norms curriculum for the benefit of a small 'c' confessional approach.

That the Study of Religion is regarded, together with Philosophy and the Social Sciences, as a discipline of reference (NKM, 2017, p. 8) for *values and norms* may be regarded as mere lip service, not least because critical interventions by scholars in the Study of Religion and even the *German Association for the Study of Religion* (Deutsche Vereinigung für Religionswissenschaft (DVRW)) both with respect to the description of the discipline of the Study of Religion in the curriculum and to the framing of religion in the current values-and-norms curriculum have not had any visible effect. The passage on the Study of Religion in the curriculum sounds almost ironic when the few lines stress the importance of 'Christian occidental traditions' rather than explaining the empirical and non-confessional self-conception of the Study of Religion. The methodological Christian bias becomes visible in every religion-related part of the curriculum, whether it is Christian topics, terms and issues also being used for the study of other religions or in the shape of different implicit or explicit 'othering'-strategies that presuppose a general Christian 'we', othering not only all 'other' religions but also secular worldviews, for example by suggesting the topic '*limitations of secular and ideological worldviews*' (NKM,

2017, p. 33, translation and emphasis WA).<sup>7</sup> Note that this happens in the context of a subject that is designed as an *obligatory alternative* to confessional RE. The danger of such an approach in the context of current European societies may be demonstrated with the different descriptions of Christianity and Islam in the curriculum for the upper secondary school with respect to ethical aspects of religions and views of life (NKM, 2018, p. 25).

While 'the 10 commandments, the Sermon of the Mount, the imperative to love your neighbour' are referred to as 'the basis of the Christian social ethic', together with 'the primacy of the gospel over the law' with respect to the relationship of ethics and the law, Islam is described as a 'religion of the law', in which 'the relationship of state and religion' and the 'submission of the individual, from the family up to the relationship to Allah' are mentioned as the aspects to be studied (NKM, 2018, p. 25). This stereotypical polarisation, where Christianity appears as the religion of love and freedom, in contrast to Islam as a religion of the law and submission, certainly does not help the students to better understand religious diversity in contemporary society or from a historical perspective. The only responsible way of relating to passages like that is to lay open the problematic assumptions, prerequisites, and discursive strategies for such an unbalanced stereotypical description and contextualise it within other Orientalist discursive strategies. A highly selective, exclusively positive, *insider* perspective of Christianity is contrasted with a stereotypical presentation of Islam as the rigid and inflexible other.<sup>8</sup>

The ambivalent and generally poorly reflected notion of religion in the alternative subjects is not a minor issue but relates to fundamental questions of human rights. If these subjects are implicitly confessional (though not at first glance to an untrained person visible) one should have the right to not be forced to take part in them. This kind of implicit and hidden indoctrination with a particular biased view of religion is, in my view, a severe human rights issue and a violation of Article 2 of protocol No. 1 of the European Convention on Human Rights. It is, furthermore, a threat to the social peace of European countries, where schools should have the task to critically discuss privileges, biases and stereotyping with respect to religion/s rather than even contributing to reproducing them in school – be it only because this is easier than employing real specialists on religion to design pedagogically and scientifically sound and up-to-date subjects and syllabuses.

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7 There is no similar suggestion of a topic like 'limitations of Christian worldviews'.

8 Andreassen's (2014) analysis of the Norwegian core curriculum comes to a very similar conclusion with respect to the representation of Christianity and Islam in Norwegian RE.

Apart from the issues concerning the so-called 'alternative subjects' and their at least implicitly confessional character, there is another very problematic issue behind the German way of framing and representing religion in school. Given the prominence of the confessional approach in the German system, this model means that, for a great majority of the pupils, religion is framed only and exclusively confessionally in schools. This raises questions with respect to the general task of schools. Why is religion something that is excluded from being a 'normal' object of study in the curriculum so that there is no space whatsoever for a non-religious perspective on it? Other topics that may be discussed controversially among mixed groups with respect to religion and worldviews, such as evolution, sexual ethics, gender roles, abortion, etc., are without any question approached from a secular perspective in the public school in Germany, possibly, in addition to some religious views on that matter in RE. Religion itself, however, is taken out of that exposition to critical scrutiny. This is highly problematic in two ways, regarding 1) 'one's own religion', i.e., the tradition that, in one way or another, provides the framework for a particular confessional version of RE, assuming that the group of pupils either is a member of or somehow related to that tradition or, to be included as an interested or perhaps even more critical 'outsider' with a secular or another religious background, and 2) the perspective that is communicated on both 'religion' in general and on 'other' religions that are not part of the given confessional framework.

The *first aspect* (1) means that the position of one particular religious community that has the right to organise that particular way of RE is the one and only perspective that one gets on one's own religion during one's whole school life. This may be in a generally critical way, but this is not a necessity. Given the fact that teachers for confessional RE have been trained merely in the confessional perspective of their own religion, issues like the role of religion in societies, the relationship between religion and the state, etc., are never studied from a critical outsider perspective but from the perspective of a religious body who has the power to train teachers and offer RE in school (i.e., a privilege that a large number of religious communities do not have). That particular perspective on religion is not questioned anywhere in school, but is generally taken as sufficient framework for communicating knowledge about religion.

Furthermore, if we consider the *second aspect* (2) of this complex of problems, this confessional perspective on religion is not confined to the communication of knowledge of 'one's own' religion only, but also allows religious communities to present their version of 'the other' religions. Given the right to provide their own perspective on religion and on 'other religions' is simply a privilege of religious communities, asserting to them the *Deutungshoheit*

(hegemonic definition of knowledge) not only on their own religion but on all other religions and secular worldviews as well. In practice, that means, for example, that a child attending Protestant RE, through his or her own whole school life, only is presented a Protestant view of Islam, with no way of contextualising this Protestant view by contrasting it, for example, with a non-religious view. Thus, most pupils leave the public school in Germany with a perspective on both 'their own' and 'other' religions being framed only and exclusively by a particular religious body, even though state authorities, of course, also take part in and control the design of the curricula for RE, in order to ensure that it does not contradict the general aims and principles of the school. Nevertheless, the representation of both 'their own' religion, 'other religions' and 'religion' in general is a privilege of the responsible religious communities.

The indoctrination that this model involves is, of course, not indoctrination in the obvious and 'hard' sense. Nobody is forced into confessional RE, and the general model leaves room for a great variety of approaches, opinions and also critical voices. It is a more subtle process, which is the result of a system that privileges the traditional established religions, limits choice in various manners, operates with inclusion, exclusion and various types of 'othering' and stereotyping. It is a system in which pupils and parents have, already in the first school year, to take a decision for or against a school subject 'religion',<sup>9</sup> and for or against including their child in one or the other group of a class that is otherwise together as a whole. It forces pupils and parents to take a particular stance on religion, if they are aware of their options and the actual consequences of their choice with respect to the framing of the topic 'religion' at all.<sup>10</sup> Thereby, religion is systematically excluded from the 'normal' curriculum that attempts to provide the pupils with a balanced and multi-faceted perspective on important issues of current societies. It is regarded exclusively as a matter of choice, from year one in school onwards. The otherwise generally secular educational perspective on social and cultural issues in secular democracies is not applied to religion in public schools in Germany. This may be called *small 'i' indoctrination*. Given the small 'c' confessional character of the alternative subjects to RE, it may, furthermore, be concluded, that it is almost not possible to escape this highly biased framing of religion in the German school system.

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9 The subject is often, in fact, in the syllabus, only called »religion« so that the confessional character is played down in favour of the impression that the subject is somehow generally on »religion«.

10 In practice, choice is actually very much limited and prompted by the way in which the (few) alternatives are presented.

## Compulsory or not? Crucial issues of integrative approaches

Integrative approaches, meaning models of RE that do not separate pupils when it comes to RE but are designed for the whole class of pupils, provide a very different framework for learning about religion in school. At first glance, they seem to avoid many of the problems that come with the separative approach, above all, of course, because they create space for all children of a class together to learn about different religions in a framework that is independent of particular religious perspectives and thereby avoids making partiality the norm. However, debates about organisational and legal issues concerning integrative RE shows that similar issues relating to privilege and the negotiation of the power of representation are at stake in these models. Upon examination, the inherent contradictions of these models become apparent. This will be demonstrated in the following by the example of the question if a model is compulsory or not. If a model is called 'inclusive' (cf. Jackson, 2016, p. 12) or is presented as a subject for all pupils, one should expect that there is nothing in the way for making it compulsory. Following European human rights legislation, making RE obligatory is not problematic as long as the different religions are represented in a 'critical, objective and pluralistic' manner,<sup>11</sup> and, of course, if the subject does not contain any religious practice (ECHR, 2007). However, even in integrative models that are designed for heterogeneous groups of pupils, this does not seem to go without saying, probably not least because integrative models usually have developed out of confessional models, and for most people involved, including scholars, mostly with a theological background who often have a religious interest in RE, and politicians, a non-religious perspective on religion seems to be if not an impossibility then at least not desirable. A secular approach to religion obviously somehow raises the fear that the most essential aspects of RE, including the promotion of the somehow inherent value of religion as such or of individual religious traditions, will be lost.

This can easily be demonstrated with the help of the documents surrounding the introduction of the new integrative subject KRL (*Kristendoms-, religions- og livssynskunnskap* / 'knowledge of Christianity, religions and views of life') in Norway in the late 1990s. Though generally designed an obligatory subject, without the option of fully withdrawing from it, it attempted to balance a traditional Christian (Lutheran) confessional approach with the study

11 The formulation is used in a number of judgements interpreting art. 2 of protocol no.1 of the European Convention on Human Rights, which requires the state to "respect the right of parents to ensure [...] education and teaching in conformity with their own religious and philosophical convictions."

of different religions and world views in order to justify its obligatory status in the canon of school subjects. The 'to and fro' between the attempt to keep important aspects of the old Christianity subject that – in contemporary society – should serve the function of preserving the 'cultural heritage' of Christianity and between a necessarily non-confessional approach that a) does not contain any kind of religious practice, b) does not qualitatively privilege individual traditions,<sup>12</sup> and c) represents the individual religions in an 'objective, critical and pluralistic' manner, have been main issues in the discussion about the Norwegian approach, leading to its failure in the UN Human Rights Committee (in 2004) and its conviction in the European Court of Human Rights (in 2007). After this heavy backlash for Norway and its KRL-subject, including the obvious embarrassment for being convicted of a breach of human rights, Norway has nevertheless decided to prioritise the integrative character of the subject, forcing itself to organise it within the above-mentioned human rights framework, having to adjust the subject after it was found in conflict with international human rights legislation, because of its illegitimate prioritisation of Christianity and inclusion of (Christian) religious practice.

England, another famous example of an integrative approach, by contrast, takes the easy way out of the complicated human rights issue. It simply does not make the subject compulsory, despite the expectation by educators, schools, and education authorities that all pupils of a class should take part in it. Therefore, aspects that may be problematic from a human-rights-perspective, for example, if the representation of religions is not 'objective, critical, and pluralistic' or if the subject contains religious practice, is not an issue, as no-one, in a hard sense, is forced into it. A recent report, 'Religion and worldviews: the way forward – a national plan for RE' (CoRE, 2018), written by a 'high profile independent commission' (CoRE, 2019) appointed by the Religious Education Council of England and Wales, and chaired by The Very Revd Dr John Hall, Dean of Westminster, which evaluates RE in England and Wales, concludes on issue of the right of withdrawal: 'Given the freedoms afforded to schools to design their own curricula, we could not guarantee that every school curriculum nationally would be sufficiently 'objective, critical and pluralistic' to justify ending the right of withdrawal, [...]' (CoRE, 2018, p. 67).

This is a remarkable conclusion, resigning from the very beginning to the challenge of organising RE in a way so that exemption is not necessary rather than attempting to adjust the model so that this problem does not emerge. This is a stark contrast to the Scandinavian models (in both Denmark, Norway

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12 This is, of course, only discussed in relation to the position of Christianity among the diversity of religions to be studied.

and Sweden) that build on truly integrative compulsory models that need to frame and represent religion in a particular way in order to be in conformity with human rights legislation. However, upon closer examination of the organisation of the English model, this is, perhaps, no surprise. If syllabuses are to be agreed upon by 'standing advisory councils on RE' in which, among educational bodies, also representatives of religious communities have to agree on a syllabus, it becomes obvious that this 'multifaith' approach is something very different from a secular approach. Furthermore, the issue of qualitative inequality would certainly come up in this model, where the group of representatives of the Church of England (in contrast to the representatives of all 'other' religions and denominations who form one group altogether) has the right to veto. This makes it highly unlikely that a syllabus that is in conflict with the interests of the Church of England, both with respect to the representation of Christianity but also with respect to the general framing of religion and religious diversity in England and elsewhere, will be 'agreed upon'. This is, for example, heavily criticised by the National Secular Society, which demands that '[r]eligious interest groups should no longer determine what gets taught. As with other subjects, the syllabus should be nationally determined by independent educationalists without an agenda motivated by a specific religion or belief.' (NSS, 2017)

Despite the generally religious and organisationally imbalanced approach (and this may be called a self-contradiction) the idea behind English RE is that all pupils should take part in it. This is presupposed in the report, which shows clearly that the attempt is made to convince parents to send their children to RE, even if they have hesitations (cf. CoRE, 2018, p. 67)

The withdrawal issue is represented instead as a problem of misconceptions of RE that must be deconstructed in discussions with parents in order to 'keep with the need to promote fundamental British values including tolerance of different faiths and beliefs' (CoRE, 2018, p. 67), than as an issue concerning the right not to take part in a religious approach that does not even intend to ensure an 'objective, critical and pluralistic' representation of religions.

Hesitations towards an approach that may contain religious practice, involve inequality of the partners in the organisational system or the simple fact that not the secular Study of Religions, but motivated 'representatives' of religious communities are used as references for the representation of religions are played down in favour of the multicultural project that this approach seems to pursue. Without any doubt, a common subject in which all pupils together talk about different religions and worldviews has many advantages compared to a mono-confessional model in which the power of representation lies within one religious community alone.

However, the rules of the game in the English model are problematic in at least three ways: 1) they include the strategic and decisive prioritisation of the majority religion 2) they make the content heavily dependent on particular religious interpretations of the individual religions (and also of 'religion' in general) and 3) they still take 'religion' out of the normal curriculum, providing mostly (albeit several) religious perspectives on religion rather than a secular perspective as in other subjects. One may wonder what the school curriculum would look like if that approach was also taken with respect to the other controversial topics mentioned above, for example, evolution, sexual ethics, gender roles or abortion. Simply providing religious perspectives on evolution is unthinkable in modern European schools. Why is this possible with respect to religion? Is religion perhaps simply regarded as not important enough to be included in the secular curriculum? Or is it, vice versa, perhaps too important, so that a secular perspective on religion, including religious truths, teachings, practice and privileges and empirical history (in contrast to religious reconstructions of history as *Heilsgeschichte*) is regarded as a threat?

Apparently, keeping a religious (though 'multifaith') perspective on religion is regarded as more important in England than designing a secular subject that then, of course, could be made compulsory, being integrative not only in theory but also in practice, respecting the rules of the game of a compulsory subject.

## Conclusion

The comparative view of different models of RE in Europe shows some striking similarities, despite the critical differences between the approaches. Many European school systems have their roots in a religious system, in which a religious perspective, for a long time, used to be the unquestioned framework for education. These systems have become increasingly secularised, but religion itself as a subject matter seems to have been exempted from that process. This is obvious in the separative system in which religion (and only religion) is addressed in a confessional way, or in a small 'c' confessional 'ethics' or 'values and norms' subject that still does not start from a secular approach to religion. The integrative models mentioned above also have their roots in confessional models, and the continuity from a confessional approach is characteristic of both of them.

In England, for example, the relevant passage in the respective Education Act states that agreed syllabuses, 'shall reflect the fact that the religious traditions in Great Britain are *in the main Christian* whilst *taking account of the teaching and practices of the other principal religions* represented in Great



Britain' (ERA, 1988, section 8.3, emphasis WA) and in Norway we have seen a long legal struggle for keeping a semi-confessional model even in an integrative context in which RE is compulsory, which is, as the human rights issues have shown, not legally possible. However, one may still wonder if the adjustments made to the Norwegian RE curriculum after the judgement of the European Court of Human Rights actually addressed the inherent problem or simply included the least possible verbal adjustments that were necessary after the judgement while keeping the ambivalent spirit. The recent changes of 2015, which includes the comeback for Christianity in the name of the subject (now called KRLE, *Kristendom, religion, livssyn og etikk*, 'Christianity, religion, views of life and ethics') and the regulation that about half of the time of the subject should be used for studying Christianity bear witness of what is at stake, the negotiation of the role and importance of Christianity, in contrast to the 'other' religions. In general, we may conclude that the integrative approaches frequently do not provide a new, secular perspective on religion (cf. Andreassen, 2014; Berglund, 2013; Frank, 2010; Jensen & Kjeldsen, 2013), but may be placed in a different position on a continuum that is still, in many ways, related to a confessional approach. This is, for example, frequently visible in the organisation of teacher training, often provided at Christian colleges of higher education with theology as the main approach rather than a study-of-religions perspective.

The discussed models of RE in Europe reflect different ways of preserving the priority of a Christian perspective on the discourse on religion in schools, be it by structurally prioritising Christian confessional RE (as in Germany) or by designing integrative approaches that nevertheless build on the priority of Christianity. The world religions paradigm is a helpful tool in that process, as it constructs religion in general 'according to an ostensibly Protestant Christian model' (Cotter & Robertson, 2016, p. 7) which, however, 'has gained the hegemonic status of ahistorical, universal 'common sense' (ibid. p. 10) and thus covers the Protestant Christian bias of that approach. The discussions around and recent developments of these models bear witness of the negotiation of the role of Christianity and of the prominence of a Christian notion of religion, which itself is not really questioned in any of the models. This happens in a context in which the privileges of the established churches, often with reference to 'cultural heritage' are renegotiated in European societies. This is obvious with respect to resources,<sup>13</sup> but in the RE context more importantly with respect to the preservation of 1) the hegemonic discourse on religion and 2) the right to define what religion is and how it should be studied (or learnt). The power imbalance in these negotiations is striking: there is not a single model in which

13 Cf. the discussion about state support for religious communities.

the different religions and worldviews are allowed to act as equal partners, and there is hardly any model in which the prominence of Christianity among the different religions is not explicitly emphasised.

Another aspect of this discourse is, however, perhaps even more important. It is generally hidden that religion, in most models, including the English integrative one, is a field that is systematically excluded from a secular approach to education. When it comes to religion, special rules apply, exemption is possible, religious communities have a say, etc. In comparison, one just needs to imagine a model of political education in which the different political parties should agree on a syllabus, with the biggest one having a right to veto. Furthermore, the frequently explicitly – in confessional and also ‘multi-faith’ models – or implicitly – even in compulsory alternative or integrative subjects – religious approach to religion is played down. This may include presenting a ‘multifaith’ approach as the natural approach in multicultural societies or by downplaying the religious character of confessional RE that is normally presented as open and critical (which it undoubtedly often is). However, it is open and critical from a confessional perspective, which is again very different from a critical secular approach that does not start from a religious perspective on religion.

When the issues above are taken seriously, the organisational and discursive landscapes around RE and religion in schools in Europe may be found to create a climate of ‘small “i” indoctrination’ (see my definition of the term above). This involves the presentation of a particular religious model of religion as self-evident and universal, even if it rests mainly on the view and privileges of the established majority religious communities, systematically subordinates ‘other’ religions discursively by applying the interpretations and paradigms of the prime model religion, and, in many ways, contradicts a secular notion and framing of religions, that one, perhaps, may expect in secular states.

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