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İNDEKSLER



SUPRANATIONAL RELIGIOUS EDUCATION POLICY AND ITS INFLUENCE: PERSPECTIVES FROM POLICY ACTORS IN TURKEY AND ENGLAND*

Abdurrahman HENDEK**

E-mail: abdurrahmanhendek@sakarya.edu.tr

ORCID ID: <https://orcid.org/0000-0003-2832-3445>

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Abstract

Religious education in state schools in Europe has to be consistent with the human rights principles expressed in the European Convention on Human Rights, and in the case-law of the European Court of Human Rights. Moreover, in the last two decades, supranational organisations have published recommendations and guidelines pertaining to religious education in state schools. In this qualitative research, how policy actors in England and Turkey interpret and perceive supranational religious education policy and its growing influence is analysed. In-depth interviews were conducted with various policy actors (n40) ranging from academics to representatives of religious and secular organisations and from teachers to state officials. The findings suggest that the policy actors interpret and understand the supranational religious education policy and its influence differently and contradictorily. What is more, it seems that supranational religious education policy is appropriated and used selectively by policy actors to promote their desired religious education model. Implications arise from these findings are discussed at the end of the article.

Keywords: Religious education, Supranational religious education policy, Turkey, England, Policy actors.

* Instructor Dr. / Öğretim Görevlisi Dr., Sakarya University Faculty of Theology Department of Philosophy and Religious Studies / Sakarya Üniversitesi İlahiyat Fakültesi Felsefe ve Din Bilimleri Bölümü.

** This article is based on my PhD thesis entitled 'A Comparative Study of Religious Education Policy in Turkey and England' (2018).

ULUSLARÜSTÜ DİN EĞİTİMİ POLİTİKASI VE ETKİSİ: TÜRKİYE VE İNGİLTERE'DEKİ POLİTİKA AKTÖRLERİNDEN PERSPEKTİFLER

Öz

Avrupa'daki devlet okullarındaki din eğitimi, Avrupa İnsan Hakları Sözleşmesi'nde ve Avrupa İnsan Hakları Mahkemesi içtihadında belirtilen insan hakları prensiplerine uygun olması gerekmektedir. Dahası, son yirmi yılda uluslararası kuruluşlar devlet okullarındaki din eğitimi ile ilgili tavsiyeler ve kılavuzlar yayınlamışlardır. Bu nitel araştırmada, İngiltere ve Türkiye'deki politika aktörlerinin uluslararası din eğitimi politikasını ve artan etkisini nasıl yorumladığı ve algıladığı incelenmektedir. Bunun için akademisyenlerden dini ve seküler kurum temsilcilerine, öğretmenlerden üst düzey devlet görevlilerine kadar çeşitli politika aktörleri ile (n40) görüşmeler yapılmıştır. Bulgular, politika aktörlerinin uluslararası din eğitimi politikasını ve etkisini farklı ve çelişkili şekillerde yorumladığını ve anladığını göstermektedir. Bunun yanında, politika aktörlerinin uluslararası din eğitimi politikasını kendi din eğitimi politikalarını desteklemek için kullandıkları görülmektedir. Bu bulgular sonucu ortaya çıkan hususlar makalenin sonunda tartışılmaktadır.

Anahtar Kelimeler: Din eğitimi, Uluslararası din eğitimi politikası, Türkiye, İngiltere, Politika aktörleri.

Introduction

It has long been recognised that education policies are the product and reflection of national cultural, economic, political and legal factors (see Bereday, 1964, p. ix). In recent decades, however, it has been argued that decisive factors shaping and even scripting national education policies are global in character (see Arnove, Torres, & Franz, 2013; Dale & Robertson, 2009; Kallo & Rinne, 2006). There is also the notion of the influence of powerful nations over global policies, as they have power to shape transnational rules and agendas. Conflict theory scholars, therefore, point to the 'differential capacity of nation states' in shaping and resisting global policies (Griffiths & Arnove, 2015, p.95). Dale (2005, pp. 131-132) argues that global policies 'very clearly reflect the different power of' nation states and that the global policies 'may be seen as being made by and in the interests of the already powerful countries'.

In the field of religious education, too, some studies have found that influence on religious education policies comes from the supranational as well as national levels (Bråten, 2009; Fancourt, 2013; Matemba, 2011; Osmer & Schweitzer, 2003; Willaime, 2007). There are global/supranational factors, forces and actors that influence national religious education policies. For example, when the European states design or implement their religious education policies, they must comply with the human rights principles expressed in the European Convention on Human Rights, especially the right to education (Article 2 of the

Protocol No. 1), religious freedom (see Article 9) and non-discrimination (Article 14). Moreover, the European Court of Human Rights has handed down cases related to religious education (ECtHR, 2007a, 2007b, 2014). According to Willaime (2007, p.65), these laws impose a 'constraint' under which religious education in Europe has been changed and evolved over time.

Moreover, in the last two decades, organisations like the Council of Europe and the Organisation for Security and Co-operation in Europe (OSCE) have published recommendations and guidelines pertaining to religious education in state schools (Council of Europe, 1999, 2005, 2007, 2008; Jackson, 2014; Keast, 2006; OSCE, 2007). The European Union (EU) can also be added to this list. Even though the EU does not have any binding policy on religious education (Köylü & Turan, 2012, p. 106), accession talks with the EU have added a new dimension to debates over religious education in Turkey (Aydın, 2007, pp.15-16). Moreover, according to Willaime (2007), even though the EU does not have a uniform approach towards religious education in state schools (p.57), the European authorities encourage 'the development of non-confessional religious education through the establishment of secular and pluridisciplinary approaches to religious faith' (p.66).

These developments show that there is a growing trend towards supranational policy development in religious education. These have culminated in *the Toledo Guiding Principles* (OSCE, 2007) which stated that 'in the sensitive domain of teaching about religions and beliefs, international standards set important limits and point toward preferred practices that go beyond legal minimums' (p.63). More recently, *Signposts* (Jackson, 2014) was published by the Council of Europe to help implementation of Recommendation CM/Rec(2008)12, which set out a number of principles, objectives and teaching methods regarding religious education. In other words, there is a trend towards supranational religious education policy, notably in Europe. In this article, therefore, all these recommendations, guidelines and human rights principles will be called 'supranational religious education policy', without arguing that there is a unified and homogenous supranational religious education policy. In fact, towards the end of the article, the question of whether there is a unified and homogenous supranational religious education policy will be discussed.

The aforementioned supranational recommendations and guidelines has influenced national religious education policies (Popov & Ofstad, 2006, pp. 96-98; Smrke & Rakar, 2006, p. 32), but the question is how they influence and how this influence is interpreted at the national/local level. This article focuses on how supranational religious education policy and its influence on national religious education policy are interpreted and perceived by various policy actors in two different European countries, Turkey and England. The article starts with a brief methodology section and then moves to the findings of the research. A discussion and conclusion is presented at the end of the article.

1. Methodology

This is a qualitative research which explores supranational religious education policy and its influence on national religious education policies as understood and perceived by policy actors in two European countries: England and Turkey through in-depth interviews conducted with various policy actors. 'Maximal variation sampling' strategy within 'purposeful sampling' was employed to sample groups and individuals in order to present diverse perspectives representing complex views on religious education, supranational policy and its influence. Five groups were identified: religious and secular organisations, professional organisations/unions, state officials, academics and teachers. A total of 40 interviews were conducted in Turkey and England. Some of the organisations included were as follows:

In England; Church of England (two representatives), Catholic Church, British Humanist Association, Jewish Leadership Council, Muslim Council of Britain, Religious Education Council of England and Wales, National Association of Teachers of Religious Education, Association of University Lecturers in Religion and Education. In Turkey; Presidency of Religious Affairs, Armenian Patriarchate, Pir Sultan Abdal Culture Association, Atatürkist Thought Association, Educators Trade Union (Eğitim Bir Sen), Education and Science Workers' Union (Eğitim Sen) Turk Education Union (Türk Eğitim Sen).

Heads of these organisations or senior officers responsible for religious education were interviewed. Moreover, academics, religious education teachers and state officials (from Ministry of National Education, Turkey and Department for Education, England) responsible for religious education (former or current at the time of interviews) were also interviewed. Due to ethical concerns, particularly to protect participants against any potential harm, their names and positions will not be revealed (Hammersley, 2015).

It should be noted that these participants are not representative. Some participants themselves pointed out that they were expressing their own views which may differ from their organisations' official views. Therefore, for example, 'representative Christian' was not used to refer to the participant from a Christian background but 'Christian representative' is used. The reason why the names of organisations or groups are identified is to make the backgrounds of the participants visible to provide a contextual depth.

This research was conducted as a part of a wider project which focused on supranational factors such as secularisation, pluralisation and supranational religious education policy and national factors such as politics and their influence on national religious education policies as understood and perceived by policy actors in Turkey and England. For example, one of the decisive factors shaping religious education in both countries, especially in Turkey, was politics (see Bahçekapılı, 2014; Chater & Erricker, 2013; Genç, 2018). This

article, however, is concerned in the main with the findings related to supranational religious education policy.

The interviewees of this research are called 'policy actors', which is partly because of the conceptualisation of policy in this research. Policy can be defined as 'official documents', i.e. official policy, but it is also possible to understand it more broadly. Policy can be understood as a 'process': a continuous cycle of policy production and reproduction (Bowe, Ball, & Gold, 1992, p.14). In this sense, policy is not only something that governments do. Rather policy is shaped and reshaped by various groups; it is interpreted and reinterpreted (Ball, 1994, p.16) and all these count as a policy process. For example, teachers, knowingly or unknowingly, actively participate in policy process by obeying, resisting, ignoring or subverting government directives and teaching programs (Cush, 2016, p.227).

Stakeholders and interest groups, some of whom are included in official policy making, while others are excluded (Ginsburg, Cooper, Raghu, & Zegarra, 1990, p. 493), still continue to attempt to influence policy through their interpretations, publications and initiatives, which all count as a 'policy making' process (Gale, 1999, p.404). The conceptualisation of policy as such means that the interpretations and views of stakeholders in this research can be seen as attempts to influence official policy.

Since the participants of this research are considered as policy actors, I use the data generated through interviews with them as both a source of information, and a source of observational data for interpretation (Hammersley, 2003, pp.120-121). In other words, the participants' views and interpretations are used as information about whether and how supranational religious education policy influence national religious education policy. Moreover, their views and interpretations are also used to explore how they use supranational religious education policy and its influence to advance their desired religious education policies.

The research adopted a general qualitative approach to data collection and analysis, mainly based on Miles, Huberman, and Saldaña (2014) who urged researchers to conduct cross-case studies to deepen 'understanding and explanation' (p.101). This research is multi-case study, which not only includes England and Turkey, but also various policy actors from England and Turkey.

2. Turkey and England as Cases

This is a comparative study, because the aim was to explore how this supranational trend is perceived in strikingly different countries. Turkey and England were selected as cases for this research, due to theoretical and practical reasons. The aim was to compare two strikingly different cases, and Turkey and England served the purpose. English religious education is often presented as a successful religious education model. Statements like

'England seems to be well in advance' in religious education (Pépin, 2009, p.49) can be found easily in religious education literature. Moreover, most of the approaches recommended by the supranational organisations were established and used in England (see Keast, 2006, pp.49-71; OSCE, 2007, pp.46-48). In contrast, Turkey's religious education often finds itself condemned in literature and international reports (ECRI, 2016, p. 8; European Commission, 2015; Kaya, 2009, pp. 20-23; Meral, 2015; MRG, n.d.; USCIRF, 2017, pp.187-188). From this perspective, the religious education policies of England and Turkey illustrate the 'most different systems design' method of comparative research (see Peters, 1998, pp.36-41).

Moreover, Turkey and England illustrate different religious traditions (Islam and Christianity respectively) and different structural locations of religion (laicism and the Established Church). There are also significant differences between English and Turkish education systems. In Turkey, there is a strict centralization of education under the patronage of the Ministry of National Education. However, in England, local determination has played an important role in education, particularly in religious education. In short, these differences show that Turkey and England serve the purpose of having two completely different cases.

In addition, the selection of Turkey and England was practical due to both language and residence. A comparison of two countries would normally require two languages. The selection of England and Turkey was practical for the researcher in this sense, given that one of the obstacles for comparative study is language (Schweitzer, 2015, p.25). Moreover, Bereday (1964, p.10) adds that 'residence abroad' is one of the fundamental aspects of comparative study. Residing in both countries helped the researcher to access key sources and identify and access potential interviewees for this research.

In short, Turkey and England were selected as cases for this thesis. Subjectivity has always been involved in the selection of cases. Other countries could have been chosen, but as a researcher I believe that these two countries serve the purpose of this research.

3. Supranational Religious Education Policy and Its Influence: Perspectives from Policy Actors in Turkey and England

One recurrent theme throughout interviews was that policy actors described, understood and perceived supranational religious education policy and its influence differently and contradictorily both across and within Turkey and England. This inescapably made it difficult to present a single narrative about the influence of supranational religious education policy on Turkey and England. For example, there was no unanimity among participants as to whether supranational religious education policy has influenced the Turkish and English religious education policies. While in Turkey half of the participants claimed that supranational religious education policy has had some influence on Turkish

religious education policy, in England only few participants argued that it has had an influence on official policy.

Moreover, there was no consensus as to what constitutes supranational religious education policy. The participants focused on different aspects of supranational policy: while some talked about recent guidelines and recommendations, others talked about general European/Western approaches to religion and religious education. There was also no consensus as to how to read and understand supranational religious education policy. For example, the question of whether supranational religious education policy requires the right to withdraw from religious education was a matter of debate among participants. What is more, there was no consensus among participants as to whether supranational religious education policy is good, bad or neither. These findings will be presented in the section below.

3.1. Influence or No Influence

Neither in Turkey nor in England was there a consensus that supranational religious education policy has influenced national religious education policies. In Turkey, some participants claimed that it has been influential. For example, some participants argued that the inclusion of the Alevi faith into the curriculum was a direct result of European Court of Human Rights (ECtHR) case (ECtHR, 2007b). Even though a senior state official who was interviewed objected to this and claimed that the inclusion of the Alevi faith into the curriculum in 2005 was not made because of the pending Court case, but because that was the 'right thing to do', other participants argued that this was made because of the ECtHR case.

Some participants in Turkey talked about the influence of the EU accession process. They regarded the removal of classification of religions as divine and non-divine from the religious education curriculum in 2000 as one of the impacts of the EU process. In classical Islamic thought, religions are classified as divine and non-divine religions. Divine religions are then further subdivided into 'distorted' and 'undistorted' religions. This classification dismisses all religions except Islam, which is seen as the only 'proper' and 'undistorted' religion (Kaymakcan, 2006).

'Religious Culture and Ethics Knowledge' courses abandoned this centuries-old teaching in 2000 with a new program, called the 'Ankara model' (Doğan & Altaş, 2004). Some participants claimed that this change in 2000 was an attempt to secularise religious education as a result of pressure coming from the West, especially from the European Union. However, this claim was challenged by a participant who was a senior state official in the 2000s. The participant argued that at that time there was a need for establishing an educational pedagogy for religious education. The participant went on to argue that the new program was 'inclusive', adopting a non-denominational model and including objective material on Islam and other religions which aimed at promoting tolerance and

respect. So for the participant 'inclusive' religious education with objective material on Islam and other religions was not an imposition of the EU but a requirement in state schools which are open to all children regardless of their faith, but for some participants this was an attempt to secularise religious education at the request of European powers.

In England, only four participants claimed that the supranational religious education policy has influenced English religious education policy. These participants argued that supranational policy was influential in maintaining the secularisation of religious education in England. A representative of the Muslim Council of Britain argued that in Europe

'religion is viewed with suspicion. This is the psychology of international organizations. They are convinced that the secular way, which marginalizes religion and confines it to the private domain, is the best way.'

According to these participants, the supranational guidelines and conventions that influence English religious education policy have been created within this context. Another participant claimed that supranational religious education policy 'absolutely influence[s] how we see religions. It actually feeds into a rather vague agenda of respect for all'.

In both countries, there were participants who argued that the supranational religious education policy has had little or no influence on the national religious education policies of Turkey and England, but more in England than in Turkey. For example, one participant in England said that 'from my perspective [...] there is very little evidence that it is having any impact'. In Turkey, especially participants from Alevi, Christian and secular backgrounds and some academics claimed that there is little or no influence at all. For instance, a Christian representative said that the EU accession process had some positive influence on Turkey, but overall 'international conventions are not complied with'. The participant said that there are 'written laws' in Turkey which are in line with international standards, but there are 'hidden laws' which are not quite compatible with the international standards. By 'hidden laws', the participant meant the way the State and state officials understand and implement international human rights standards. Similarly, the Alevi representative said that Turkey is a party to almost all international human rights conventions, but it either has ratified them with reservations or has not complied with them in action. In other words, these participants claimed that the principles and policies coming from outside are not 'internalised' in practice, even though they were internalised as national laws. Therefore, they do not have much influence on Turkish religious education policy in practice.

3.2. Supranational Religious Education Policy

As can be seen above, not all participants agreed that supranational religious education policy has had an impact on official religious education policy. This was partly because the participants focused on different supranational organisations and policies. In Turkey, the European Court of Human Rights was mentioned most as a supranational factor by the participants (fourteen participants). This was because the Court has made direct intervention in the Turkish religious education policy through two cases brought before the Court by Alevi families. In 2007 and 2014, the Court found that religious education classes in Turkey had not been conducted in an *objective, critical and pluralistic* manner. Hence, the Court demanded changes in religious education policy in Turkey (ECtHR, 2007b, 2014). By contrast, the European Court of Human Rights was only mentioned by two participants in England and one of them said that he was aware of the Court rulings but added that 'maybe you can tell me more about it'. That might mean that the European Court of Human Rights was not seen as a significant supranational factor in England, even though these cases sparked and informed academic and public debate not only in related countries (i.e. Turkey and Norway) but also in other countries as to whether existing or proposed religious education policies are compatible with human rights standards expressed in these cases.

Even though the participants in England did not find the Court as an important factor, its importance was realised by the Commission on Religious Education, which was established by the Religious Education Council of England and Wales to review the legal and policy frameworks of religious education in England. The Commission for example recommended retaining the right to withdraw from religious education despite growing calls for abolishing it, partly because, the Commission argued, it is 'protected' by the European Convention on Human Rights, and because 'so many of the challenges which have been brought [before the European Court of Human Rights] have been successful' (Commission on Religious Education, 2018, pp. 63-67).

In England the participants often talked about recent international guidelines and recommendations such as the Toledo Guiding Principles and the Council of Europe's recommendations (thirteen participants), which were mentioned only by two participants in Turkey. This indicates that most Turkish participants were not very familiar with these recommendations and guidelines, while most English participants had knowledge of them. In England while some participants argued that these recommendations and guidelines have not had any influence, some claimed that they are not really relevant to English religious education (see below).

International conventions such as the European Convention on Human Rights and the Universal Declaration of Human Rights were mentioned both in Turkey and England

(eleven and eight, respectively), but many participants mentioned them in passing, rather than articulating what they mean to religious education policy in practice.

In Turkey, six participants mentioned the European Union as a supranational factor influencing Turkish religious education. This is despite the fact that the European Union has not published any guidelines regarding religious education policy yet. However, the EU supports the recommendations of the Council of Europe and monitors whether the decisions of the Court are implemented or not. Moreover, from 1998 onwards, the EU Commission's annual progress reports on Turkey monitor issues related to religious freedom (e.g. European Commission, 2015, p.63). Interestingly, the European Union was not mentioned at all by the English participants, even though England was a member state of the European Union at the time of the interviews.

An important finding is that the participants associated the supranational religious education policy exclusively with the West, by which, they mean, Europe and the USA. Given that Turkey and England are members of European regional organizations such as the Council of Europe, and the European Court of Human Rights, this may not be surprising, since memberships to these organisations require both countries to adhere to the standards articulated by these organisations, notwithstanding, it is clear that for the participants of this study, the supranational or global was understood as European or Western. What is more, in Turkey, even the positive foreign examples given by the participants were all from Western countries. Countries from the East such as Afghanistan, Pakistan and Iraq were often mentioned as negative lessons by the participants.

3.3. A Threat to National Unity or A Blessing

When the participants talked about supranational organisations and their policies, some participants did not shy away from expressing their strong disapproval of their influence. In Turkey, some participants pointed to the secret agenda of the West. For example, a representative from the Atatürkist Thought Association said that 'due to its unprecedented geo-strategic position, as a matter of fact, Turkey has often been targeted to be controlled through international conventions by the Western countries'.

Similarly, a Turk Education Union representative said that 'it is known that the West does not want Turkey to be powerful again and for Islam to regulate world order'. He continued:

'[but] they do not intervene directly, we know that they rather gradually do so through distorting our belief system, through causing degenerations in our morality. They change our perception of what is immoral and what is not. They try to justify this process through international conventions and agreements such as European Union laws or international human rights standards. It was

just a decade ago (...) that adultery was forbidden by law, but today it is allowed as a result of the EU accession process’.

To the participant, religious education policy should not be changed at the request of Western powers.

Likewise, a former state official accused the Western powers of ‘creating sectarian splits’ by supporting certain ‘atheist Alevi groups’ while a teacher said that ‘European norms (...) are the barriers to ideal religious education in Turkey’, since they do not allow schools and teachers to teach Islam properly.

It seems that these participants saw the supranational influence as not only negative but also dangerous, possibly a threat to the national unity of Turkey. However, it should be noted that what these participants considered as policy imposition of the West differed markedly. For example, a participant from the Atatürkist Thought Association saw Western influence dangerous because, according to him, this might lead to the transfer of education to ‘religious orders’, which would not and should not be acceptable in laic Turkey. For him, current religious education courses should be voluntary because they are not taught in an objective manner, which shows that his views on that matter were no different from the European Court of Human Rights’ decisions. However, the other three participants argued that the State should retain compulsory religious education regardless of what the ‘Western’ powers think about religious education policy in Turkey. This shows that these participants objected to certain policies that, they thought, could be introduced because of the influence of the West.

In Turkey, there were also participants who criticised some aspects of the supranational policy, while praising others. For example, a Presidency of Religious Affairs representative found the Court’s decision wrong and reiterated the Presidency of Religious Affairs’ view on the issue. The former head of the Presidency of Religious Affairs was one of the critics of the Court’s ruling on religious education. He argued that the Court’s decision has ‘no basis’ because the Court’s judges considered themselves as experts on religious issues without having any sound knowledge about religion and without consulting with religious scholars (Bardakoğlu, 2008). Interestingly, the Presidency of Religious Affairs representative praised the human rights principles for widening religious freedom in Turkey, but criticised the Court which was set up to ensure compliance by the States with their undertakings of human rights principles.

Moreover, some participants accused the European Court of Human Rights of making ‘biased’ decisions. Alevi and the Education and Science Workers’ Union representatives said that the Court made a ‘biased’ decision, because of ‘the close relationship between the Turkish government and European authorities’ at that time. The Alevi representative said that the Alevi’s expectation was that the Court would order Turkish authorities to make the course voluntary, but instead the Court offered two options; either making the

course objective, critical and pluralistic or providing appropriate arrangements for withdrawal and the Turkish authorities 'deliberately' chose the first option by just adding little information about the Alevi faith into the curriculum, which was not enough to protect the rights of Alevi according to the participant.

Nevertheless, as stated above, some participants expressed positive views about the West and supranational influence and argued that the supranational conventions, guidelines and standards are the way forward for religious education policy in Turkey. In other words, Turkish religious education policy should be in line with these standards. Some participants even praised Western influence for helping to widen religious freedom in Turkey. For example, the Educators Trade Union representative said that

'if Turkey had been left alone, these developments [such as the introduction of religious courses] would have taken ages.'

He meant that if the Western States and organisations had not forced Turkey to widen religious freedom, Turkey would still not have had religious freedom that it has today.

The attitudes of the participants towards supranational policy or the West reveal an underlying dilemma. Some participants seemed to criticise the West when they saw them as a threat to their policy preferences. The Education and Science Workers' Union representative stressed this issue. The participant argued that in Turkey, foreign examples are being used selectively: when the politicians want to introduce something, they use foreign examples that suit their policies. This dilemma also partly explains why some participants claim that supranational policy has had an influence on religious education policy, and in the meantime others disagree.

3.4. Too Secular: Good or Bad

The same dilemma can be seen among English participants. Some participants criticised the supranational policies as being too secular. For example, an Anglican representative said that

'The European system has been heavily influenced by the French, who believe that laicism is the way you do this – which would not work here'.

For the participant, the 'laic' system is too secular, which can cause further secularisation and would not work in England. Similarly, the Muslim Council of Britain representative in England argued that European secularity means suspicion and hatred of religion. The participant argued that

'[They] distort religion [by] promoting certain perspectives [about religions], which they feel are more cohesive and palatable to the European context'.

According to the participant this approach to religious education 'fit[s] religions into the matchbox of secularism.'

However, a British Humanist Association representative argued that supranational guidelines were ‘ignored by the governments [because supranational guidelines were] too impartial and too secular (...) They [British Governments] do not want to be impartial. They want a particular religion to dominate.’ According to the participant being too secular means being impartial, which is positive and desirable.

So these participants agreed that the supranational guidelines were ‘too secular’, but this was positive for the British Humanist Association representative, but negative for Anglican and Muslim participants.

In England, too, there were participants who expressed negative and positive views about the supranational influence. The British Humanist Association representative criticised the politicians for not adopting European guidelines and he referred constantly to international guidelines and conventions to make his case, especially for objective and pluralistic religious education. For example, the participant argued that non-religious worldviews should be formally included into religious education as ‘it reflects recommendations in international guidelines.’ Moreover, one academic criticised politicians for ignoring supranational policies. In contrast, some participants argued that supranational policy has already had an influence on English religious education, and for them this was a negative influence (see above). Furthermore, some participants saw supranational policy positive, but they argued that English religious education does not need to be influenced by supranational policy (see below).

3.5. How to Read Supranational Religious Education Policy?

One constant theme running through interviews was that there were stark differences among participants as to how to read and understand the supranational religious education policy. As seen above, some participants disapproved supranational influence, while others praised it. It means that some participants read supranational influence positively, while others negatively. What is more, there were also differences among participants who see supranational religious education policy positively. This was especially the case among Turkish participants, because far more Turkish participants used the supranational policies to support their arguments than had English participants (eleven to three).

The status of religious education in Turkey is the case in point. Five participants argued that the supranational conventions do not require the abolition of compulsory religious education as long as it is taught in an objective and pluralistic manner. They cited the right to education clause of the European Convention on Human Rights including other international conventions and the Court decisions as evidences of the permissibility of compulsory religious education, and argued that Turkish religious education is objective and pluralistic. However, some participants cited the same articles, but reached the conclusion that they require at least the introduction of the universal right to withdraw

from religious education. This was also the position taken by some non-governmental organisations that push for religious education reform. For example, the Education Reform Initiative mentioned Article 13 of the International Covenant on Economic, Social and Cultural Rights and Article 2 of the European Convention on Human Rights, and argued that ‘in view of the international conventions that Turkey ratified (...), Turkey should secure the right not to receive religious instruction/education inconsistent with one’s own conviction’ (ERI, 2007, p.4). Of course, a part of the problem here is whether Turkish religious education is non-confessional and non-denominational or not (Gündüz, 2018; Hendek, 2019; Zengin, 2017). Participants who wanted the introduction of the universal right of withdrawal argued that religious education in Turkey is not non-denominational and non-confessional, therefore they deployed international human rights standards in support of their call for ending compulsory religious education in Turkey.

3.6. Long Way to Go

The phrase ‘long way to go’ came up in interviews in both countries, but for different reasons, which shows the difference between Turkey and England in terms of external influence. In England, seven participants argued that supranational religious education policy should be influenced by English religious education policy, not the reverse. For example, one of the Church of England representatives said that

‘they have a long way to go to catch up actually. Initially they did not want anything to do with faith’.

For these participants, supranational organisations should learn from the English experience to devise supranational religious education policy because, initially, they did not do anything related to religious education. Some participants even claimed that supranational religious education policy is not really relevant to English religious education, because English religious education is far better than what supranational organisations offer or recommend right now.

However, in Turkey the participants did not claim that supranational religious education should be influenced by Turkish religious education policy. Even the participants who disapproved supranational policies did not offer Turkish religious education as a model to supranational religious education policy. Some even acknowledged that the Turkish model might not be suitable for others. The Turk Education Union representative who was critical of Western influence said that the Turkish nation is different from other nations: ‘our system might not be suitable for others, but it suits us’. There were some Turkish participants who offered the Turkish model to other Muslim countries, specifically to Iraq, Pakistan and Afghanistan (see also Aşlamacı & Kaymakcan, 2017) which are presented as negative cases. For example, a senior state official said that only the State must provide religious education, otherwise, people would learn about religions from the ‘wrong

places' – and this would lead to fanaticism and terrorism, as is the case in Pakistan and Afghanistan. In Turkey, the phrase 'the long way to go' was used by participants who were critical of Turkish religious education policy to mean that religious education in Turkey has a long way to go to catch up to the standards embedded in international laws and court cases.

4. Discussion

The main findings will be discussed in this section of the article. In both countries there were participants who argued that there was little or no influence on religious education policy from supranational policies. As signatory states of almost all international human rights conventions and members of regional organisations that publish guidelines and recommendations, Turkey and England are expected to obey the principles embedded in these documents, but according to some participants this was not the case. One possible reason for this was hinted by a Christian participant in Turkey, who argued that international standards have been internalised as national laws, but they are not internalised and acted upon in practice because they have been seen as external interventions. This shows that even though international principles and standards, including human rights principles enjoy a popularity, the extent of their sincere application is doubtful (Freeman, 2004, p.392). Possibly because of this, some participants in Turkey argued that the real solution to peace and stability in plural Turkey lies in 'turning back to our culture again'.

Several participants in both countries expressed negative views about supranational policies, but it was the Turkish participants who were harsher in their criticisms. In England, no participant argued that the Western powers try to control England through supranational organisations and policies¹, but this was clearly articulated by some participants in Turkey. In England, too, some participants criticised the supranational policies as being too 'secular', which might bring more secularisation.

In some comparative religious education studies such as Alberts (2007) and Willaime (2007), supranational religious education policy was presented as something that should be adhered to, but this study shows that there are local policy actors who saw them as too secular, negative and even dangerous. Even though not all participants thought in this way, it is still important for supranational organisations to convincingly demonstrate that their policies do not impose any 'secular' perspectives, nor do they aim at undermining social unity (Arthur & Holdsworth, 2012; Gearon, 2012).

Overall, a recurring theme was that the supranational policies were read and understood

¹ However, during the Brexit vote, the leave campaign constantly argued that EU institutions have drained power from the British parliament through various treaties. Therefore, one of their campaign slogans was 'Take Control'.

differently. There might be a variety of reasons for these different readings and interpretations.

One reason might be that there is no homogenous and unified supranational religious education policy. Even if there is one, as a supranational policy, it was formulated in such general terms that it allows different, and sometimes contradictory, interpretations (Cush, 2007, p.220; Schreiner, 2006, p.861; Slotte, 2011). For example, the Court decision was understood in different ways in Turkey, which supports Relaño (2010)'s argument that there was not enough clarity in the Court rulings, especially as to what the Court means by critical and objective religious education. Then, it can be argued that there is a need for a clear articulation of what human rights principles, international guidelines and court cases mean to national religious education policy.

Yet, there might be another reason for different interpretations, that is, the nature of human beings. Human beings tend to see 'the same world in different ways' (Jackson, 2017, pp.3-4), partly because of their values and beliefs. The policy actors did not approach religious education as detached and 'objective' individuals (Cooling, Green, Morris, & Revell, 2016, p.8). The disagreements among participants were not merely a matter of confusion. Rather, as Gearon (2018) argues, 'the stakes are high'. There seem to be political, religious and personal stakes in the contending positions.

Religious education policy, in other words, was a mirror for wider battles over religion, society and politics, which probably led some participants to 'appropriate' supranational policies 'to support their local cultural and political interests' (Akboga, 2016, p. 786). In other words, the participants might selectively use and abuse supranational policies to support their desired religious education policies. As a result, for example, the same human rights principles were called upon by different participants to support conflicting policies (Kuburić & Moe, 2006, p.163; Richardson, 2016, pp.300-301; Smrke & Rakar, 2006, p.32).

It seemed that this was the case more in Turkey than in England. Far more Turkish participants used the supranational policies to argue their case than English participants did (eleven to three). Is this because Turkish participants were more receptive to the supranational influence than English participants? This might be one reason, as claimed by some participants in my study. An academic in Turkey argued that modernisation was often understood as 'Westernisation' in Turkey which has made the West a role model for Turkey. According to Berkes, since the end of the eighteenth century, Turks have 'begun to look outside, more particularly to the West, for new inspiration' (Berkes, 1964, p.25).

In England, however, there was a kind of belief in English religious education policy. A senior state official in England said that,

'Religious education in England has its own momentum and character and

there is still tendency in religious education in England to think that the rest of the world might be influenced by our model, but there is not much for us to learn from anywhere else.'

However, there might also be another reason, that is, the official religious education policy. It can be speculated that when official religious education policy is seen as restrictive by local policy actors, they are more likely to look abroad for support for their arguments (Kuburić & Moe, 2006). This was especially the case in Turkey, where many participants criticised official religious education policy. Some participants criticised the lack of a universal right to withdraw from religious education and the lack of inclusive religious education. These participants deployed supranational references in support of their policy preferences. However, while these participants look at the supranational policies for change, other participants look at the same policies to defend the status quo, both groups claiming that the supranational policy supports their claims.

On the other hand, in England, with the existence of the universal right to withdraw from religious education, relatively inclusive religious education (according to the majority of the participants) and the possibility of confessional religious education in faith schools, the participants probably felt less of a need to look abroad, but there were still outliers who looked abroad, as seen above. It then can be argued that the more local actors believe in their national religious education policy, the less likely they look abroad for support and inspiration.

Conclusion

In the beginning of the article, I argued that supranational conventions, court decisions, recommendations and reports create 'supranational religious education policy'. Even though this does not mean there is a unified policy, it means that they create 'standards' to ensure that each religious education policy evolves in a way that is respectful of fundamental human rights principles (Hunter-Henin, 2011, p.3). However, the participants of this study expressed different and contradictory accounts about supranational religious education policy and its influence on religious education policy.

There was no unanimity among participants as to whether supranational religious education policy has influenced religious education in Turkey and England. There was also no consensus as to how to read and understand supranational religious education policy. What is more, the participants disagreed over whether supranational religious education policy is good, bad or neither.

One implication of these findings is that there seems no clear supranational religious education policy. If supranational organisations want to create one, they should better articulate what supranational religious education policy would mean to national religious education policies in order to prevent contradictory interpretive differences. However,

because of national, cultural, religious and political differences among European countries, that task seems difficult if not impossible.

What is more, due to human nature and different worldviews and beliefs, local policy actors would probably still understand and 'appropriate' these newly articulated standards in different ways to accommodate and advance their desired religious education policies. As Colling argues, worldviews, beliefs and values 'frame the way in which the knowledge learnt is understood' and interpreted (Cooling, 2010, p.39). Given the diversity of opinions regarding religious education, the way forward might be an open and plural religious education policy which accommodates diversity found in both countries. This might also make local policy actors less likely to look abroad for inspiration and to appropriate and selectively use international standards.

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