

SPECIAL ISSUE

INTERCULTURALISM

A COMPARATIVE LEXICON

Editor: Silvia Bagni

Davide Strazzari

Intercultural Education: What Is Called for?

A Comparison of European and Latin-America Experiences

Abstract

Intercultural education policy has emerged as an alternative to both assimilationism and multiculturalism. While multiculturalism emphasizes the cultural identity of social groups, somehow crystallizing their characteristics, interculturalism is based on a different understanding: it favors mutual dialogue and it assumes that the cultural identity of an individual cannot be equated to that of the social/cultural group to which he is assumed to belong. The paper considers the European and the Latin-America experiences in a comparative perspective. The two cases target intercultural education policy differently: while in Europe it addresses the cultural diversity related to the immigration flows, in Latin-America it is seen as an instrument to promote indigenous cultural claims. The strategy is also different. In Europe intercultural education policy is grounded on the idea of promoting allegedly common legal values, mainly by means of citizenship education and education about religion with a cognitivist approach. As such, intercultural education is above all a way to enhance social cohesion, rather than diversity and pluralism, being a mild form of assimilationism.

Keywords: Multiculturalism, interculturalism, intercultural education, citizenship education, Latin America and Europe, comparative law.

1. Introduction

Intercultural education is a topic mainly studied by political scientists, sociologists and pedagogists, much less by jurists.¹ As a matter of fact, when a legal text uses this expression, very often it does so

¹ Among them: Giusti (2017); Berardo and Deardoff, (2012); Abdallah-Preteceille (1996 and 2011).

uncritically, without providing a legal definition. Given this assumed gap, the main aim of the paper is to explore the possible legal implications of intercultural education². In order to do that, I adopt a constitutional comparative perspective, looking at the way the concept is enforced respectively in European and Latin American countries.

Intercultural education implies, by its very definition and the use of prefix *inter-*, a confrontation, a mutual dialogue between different cultures. There are, however, two distinct ideal outlets to which interculturalism, in general, and intercultural education, specifically, can lead.

On the one hand, intercultural education may presuppose an *equitable* interaction between cultures, which in turn should lead to a synthesis of diversity, to a re-founding of knowledge. Although it may sound utopian, this perspective emerges, for example, looking at the Latin American experience where the concept is mainly used in relation to the indigenous groups and the need to include their cultural heritage and epistemic approaches into the mainstream cultural paradigms. This viewpoint is also endorsed in the definition of interculturality given by UNESCO.³ Here, the underlying constitutional value is indeed that of the promotion of pluralism and cultural diversity.

On the other hand, in the European context, if we assume the Council of Europe's White Paper on Intercultural Dialogue of 2008⁴ as the main frame of reference, intercultural education is mainly related to people with a migratory background rather than the so-called national minorities. The emphasis is on what unites, which is identified in common and allegedly universal principles, but, in reality, peculiar to the host country or at least to a given geographical area having common historical and legal culture roots. The majoritarian cultural paradigm within which to integrate is substantially unaffected by the encounter with the 'other'. Rather, this paradigm must not only be respected, but also effectively internalised and adhered to. The objective, therefore, is not so much the promotion of pluralism and diversity, but political, social and cultural integration, the cohesion of culturally diverse societies⁵.

What is shared by these two approaches to intercultural education is the criticism towards the so-called multiculturalism, which is blamed for overemphasising the diversity of the social ethnic groups and crystallising a person's cultural identity in that of the ethnic group to which the individual belongs to. In short, multiculturalism is liable of juxtaposing cultures and denying mutual influences.⁶

Intercultural education, albeit in the diversity of accents just highlighted, is often a concept that is indebted to the contribution of international organisations, such as, first and foremost, the Council of Europe and UNESCO.

² For the purposes of this contribution, education and educational system are referred to the institutions, both public and private, which offer in a given country primary and secondary education, with the exclusion of higher education.

³ UNESCO, Convention on the Protection and Promotion of the Diversity of Cultural Expressions (2005), Art. 4.9: "Interculturality refers to the existence and *equitable interaction* between different cultures and the possibility of producing shared cultures and mutual respect" (italics ours).

⁴ Council of Europe, (2008).

⁵ On the risks that interculturalism may justify the adoption of assimilationist policies, see Berry (2018: 441 ff); Taylor (2012: 416); Xanthaki (2016: 815 ff).

⁶ See Ricca (2008: 10 ff). The debate in the social sciences is intense and with a variety of positions. Among others, see Joppke (2018); Meer, Modood and Zapata-Barrero (2016); Bouchard, (2011: 435 ff.).

And yet, this logic of top-down influence cannot overlook the fact that national regulatory role is still particularly relevant. Even in the most advanced experiments of supranational integration, as the EU case, education on the one hand, and immigrants' integration policies, on the other, are two areas that are still firmly left to the sovereign decisions of States and where the EU role is limited to *soft law* coordination and financing projects.⁷

Thus, although intercultural education as a policy is influenced and shaped by international actors, there are indeed several national variables that can impact on it. For instance, there are States in which educational policies are structured according to a strictly centralist conception and others in which, instead, a greater territorial and/or scholastic institution self-government applies. It is also important to consider how the national school system is organised, whether it is predominantly public or, on the contrary, mixed, with private schools having a religious character. In the latter case, a further element to be taken into account is whether private (religious) schools are financially independent or financed by public institutions.

Finally, it is evident that intercultural education also has a necessarily *micro* dimension represented by the individual teacher and his or her freedom to teach. It is in fact often at this level that strategies and tools proper to intercultural education are concretely implemented. Obviously, this dimension cannot be considered here, and the analysis must focus, rather, on the *macro*, so to speak, *policy* profiles, represented by data obtainable from legislation and also often from government documents, which are inevitably general, if not generic, regarding the meaning of interculturality that is actually promoted.

2. Intercultural education in the European panorama: genesis and development of a concept in a diachronic perspective

Intercultural education must not be confused with those educational measures, of a compensatory nature, with which schools and teachers intervene specifically on foreign students or students with a migratory background specifically, in order, above all, to make them master the language of the host country. This is certainly not to say that educational supports of this type are not necessary. Evidently, the effectiveness of the right to education and the social integration of minors with a migratory background presuppose the acquisition of the language of the host state also as a vehicular language of study. However, intercultural education clearly has a different objective, which concerns the management of social diversity at school as a whole, and for this reason it entails the involvement of all students, not just foreigners or those with a foreign background.⁸

Though, the idea of reducing intercultural education to the so-called 'pedagogy for foreigners' was dominant in the European context until the 1980s and was in some ways linked to an

⁷ In relation to culture and education, art. 6 TFEU limits EU intervention to «actions to support, coordinate or supplement the action of member states». With regard to the integration of foreigners, Art. 79.4 TFEU provides that the EU may establish measures to encourage and support the action of Member States in order to promote the integration of third-country nationals residing legally in their territories, excluding any harmonisation of the laws and regulations of the Member States.

⁸ See Min. Pubblica Istruzione, Osservatorio nazionale per l'integrazione degli alunni stranieri e l'educazione interculturale (2022: 9).

assimilationist model: the immigrant - perceived as 'other' - was invited to quickly acquire the connotative traits of the majority. He/she was not seen as an individual with his/her own autonomous identity, but as someone who had to overcome the original defect of being a foreigner⁹.

The minimalist reading of intercultural education, which equates it with the so-called 'pedagogy for foreigners', is outdated, at least in the pedagogical sphere. However, in some cases it continues to be present to a certain extent at the normative level, thereby contributing to misunderstandings. For example, the Italian legal order mentions intercultural education and provides some references to the types of activities the concept implies,¹⁰ but it does so in the context of the Immigration Act. This choice is in itself indicative of a sectorial vision of intercultural education and this impression gets stronger when reading the heading of the article, namely 'Education of foreigners. Intercultural education'¹¹.

The second phase of intercultural education began in the 1980s and was characterised by a general appreciation of diversity as a result of immigration. Here, interculturality becomes essentially synonymous with multiculturalism.¹² On the one hand, this trend is characterised by the recognition of the 'otherness' and by a relativist tendency that leads to value the various cultures on an equal footing. On the other hand, however, foreign students or students with a migratory background are considered, simply because of their national origins, as if they were the bearers of the asserted culture of their ascendants' ethnic group. Moreover, this approach does not pay due attention to the individual experience and the risk is stereotyping and reducing cultural pluralism to mere folklore. This is the so-called '*cous-cous* pedagogy': the multicultural moment is embodied in the realisation of a multi-ethnic lunch, where it is assumed that students of Arab origin bring *cous-cous*, as if this dish were the one necessarily cooked at home.¹³

The push towards a multicultural and identity-essentialist approach to education comes to Europe in the wake of UNESCO initiatives and the 1989 UN Convention on the Rights of the Child, whose Article 29(1)(c) states that States Parties agree that the purpose of the child's education shall be "the development of respect for the child's parents, his or her own cultural identity, language and values, for the national values of the country in which the child is living, the country from which he or she may originate and for civilisations different from his or her own".¹⁴

⁹ Burgio (2015: 103 ff).

¹⁰ Sec. 38.3 of Legislative Decree no. 286/1998 according to which: "The school community embraces linguistic and cultural differences as a value to be placed at the foundation of mutual respect, of the exchange between cultures and tolerance; to this end, it promotes and encourages initiatives aimed at welcoming, protecting the culture and language of origin, and carrying out common intercultural activities" (our translation).

¹¹ It must be stressed, however, that at the policy level intercultural education is correctly approached and defined by ministerial documents. See Min. Pubblica Istruzione, Osservatorio nazionale per l'integrazione degli alunni stranieri e l'educazione interculturale (2022: 9).

¹² For this periodisation, see Lorcerie (2021: 11 ff).

¹³ Burgio (2015: 104 ff).

¹⁴ By contrast, art. 29(1) subparagraphs b) and d) are characterized by an intercultural approach. The former states that the education of the child shall be directed to the development of respect for human rights and fundamental freedoms, and for the principles enshrined in the Charter of the United Nations; while the latter holds that education shall be directed to "the preparation of the child for responsible life in a free society, in the spirit of understanding, peace, tolerance, equality of sexes, and friendship among all peoples, ethnic, national and religious groups and persons of indigenous origin".

At the Council of Europe's level, such an approach can be found in the Recommendation of 25 September 1984 on the '*formation des enseignants à une éducation pour la compréhension interculturelle*'. Despite the use of the term intercultural, the Recommendation is inspired by a multiculturalist approach insofar as it refers to cultural communities rather than individuals, recognising value and originality to each of them.¹⁵

At the national level and assuming France as an example, this phase where intercultural education is connoted according to a multicultural perspective coincides with the introduction in schools of the teaching called *Langues et culture d'origins* (ELCO).

Launched in 1978 as a paradigmatic example of intercultural education activity, the project was part of a national educational context traditionally marked by assimilationism.¹⁶ The ELCO teaching was primarily conceived as a tool addressed to foreign minors schooled in France in order to enable them to better master their language of origin and, indeed, certain cultural traits. Initially, the aim was to facilitate their return to the country of origin, which was thought possible after the freeze of the economic immigration in the early 1970s. The very organisation of the course was based on an internationalist management of relations: teaching was provided by teachers paid by the states with which France had concluded special international agreements (Turkey, Algeria, Tunisia, Morocco, Italy, Portugal, Spain, Yugoslavia).

The ELCO experience, however, has been the subject of considerable rethinking and criticism, because of the quality of teaching and of the teachers¹⁷ and because of the communitarian view of the inter-ethnic relations. A foreign origin child was expected to attend ELCO in order to maintain a cultural link with his/her country of origin.¹⁸ Indeed, in relation to certain languages, such as Italian or Portuguese, ELCO was transformed into a curricular course, because this corresponded to a real interest on the part of families in improving the learner's languages skills and human capital rather than in keeping alive a generic reminder of the family's cultural roots¹⁹

The third step of intercultural education - when interculturality is conceptually detached from multiculturalism - is the result of an overall review of the integration management strategy. The starting point is undoubtedly related to the issue of individual identity. Multiculturalism in education is criticised because it tends to consider identity as an essentially unchangeable feature, defined in relation to the cultural traits of the native ethnic group. Students are no longer first-generation immigrants but are often born and have lived in the countries of which they often are citizens. All this evidently makes them bearers of a fluid and undefinable cultural identity. There is a new awareness that the problem is not linked to a clash of cultures, but, rather, to the processes of ethnicization in which minors with migratory backgrounds are protagonists. They are very often victims of racial prejudices and stereotypes; they belong to disadvantaged social classes and because of this they are denied an effective social emancipation.²⁰

¹⁵ This is noted by Lorcerie (2002: 26).

¹⁶ On this point, Kerzil, (2002: 144-145).

¹⁷ With particular reference to the Arabic language. See Rapport au Président de la République de la Commission de réflexion sur l'application du principe de laïcité dans la République, (2003: 54-55).

¹⁸ *Ibid*, pp. 53-54.

¹⁹ See Castellotti (2010: 83 ff).

²⁰ See Lorcerie (2021: 73 ff).

Intercultural education, then, takes a dialogic perspective, of mutual respect and listening, and aims to identify commonalities. The attempt is to make a synthesis between social cohesion and diversity. If in the assimilationist phase the diversity of the other was not valued but substantially denied, if in the multicultural phase, on the contrary, there is an awareness of the existence of diversity and the need to maintain specificities, in the intercultural phase there is a desire to achieve greater social cohesion through processes that do not impose, at least in theory, a pre-packaged integrative paradigm, but make use of dialogic processes. Hence, intercultural education is addressed to everyone, not just pupils with a foreign origin.

The elaboration of the concept of intercultural, in the ultimate sense described here, is developed within the Council of Europe mainly by external experts and the contribution of various NGOs and associations working in the field of education. It is, therefore, a top-down process, guided by cultural *elites*, and it is not based on the involvement of those cultural components that should also be the main actors of the intercultural discourse. It is interesting to point out that these developments occur especially on the occasion of the accession of Central and Eastern European countries to the Council of Europe. Thus, the topic of interculturality is initially linked to the issue of school integration of historical national minorities, Roma in particular.²¹

This aspect leads to an emphasis on combating racial discrimination and xenophobia. In 1993 the Council of Europe set up the European Commission against Racism and Intolerance (ECRI) and in 1995 the Framework Convention for the Protection of National Minorities was signed. The EU, too, at the end of the millennium, adopted a whole series of initiatives - legislative and otherwise - that emphasised the fight against xenophobia and racism.²²

The 11th September 2001 and the following Islamic terrorist attacks that occurred in Europe in the first decade of 2000's determined a shift in focus from the issue of integration of ethnic/national minorities to the diversity associated with migration processes.

In fact, shortly after these events, criticism against the policies of multiculturalism began to rise.²³ Multiculturalism was accused by national political protagonists of fomenting divisions. Interculturalism and its alleged focus on dialogue were increasingly considered as instruments capable of guaranteeing effective social cohesion. The adoption by the EU Council in 2004 of the *Common Basic Principles for Immigrant Integration Policy in the EU*²⁴ and the Council of Europe's White Paper on Intercultural Dialogue in 2008 are very good examples of this new policy.

Interculturalism, therefore, became more "militant" and its ideological scope got clearer. This shift in focus certainly impacted on intercultural education itself. A review of both the methodological and educational instruments and the content of the teachings was already under-way, but these innovations were placed above all at the *micro* context, i.e., at the teaching staff level. Now, intercultural

²¹ See Rey-von Allmen (2010: 39 ff).

²² These include the establishment of the European Monitoring Centre on Racism and Xenophobia (Reg. 1035/97 of 2 June 1997), which later evolved into the current European Agency for Fundamental Rights in 2007, and the adoption of Directive 2000/43/EC implementing the principle of equal treatment irrespective of racial or ethnic origin.

²³ See Vertovec and Wessendorf (2010).

²⁴ See *Common Basic Principles for Immigrant Integration policies in the EU*, Council Conclusions, 19 November 2004, available at http://www.consilium.europa.eu/ueDocs/cms_Data/docs/oressData/en/jha/82745.pdf

education becomes a structural component of a broader socio-political design strategically linked to the formation of the ‘good citizen’.²⁵

According to the Eurydice Report 2019, there are 31 education systems in Europe that have national regulations and/or recommendations promoting intercultural education in schools; only in the Netherlands is the provision of intercultural education the responsibility of local authorities/schools; while in 10 national education systems there are no regulations or recommendations on the point. While in France and the United Kingdom (England and Scotland) it is a specific theme of the compulsory citizenship education course curriculum (see *below*), in other states, Italy included, it is more of a cross-curricular theme or, in other national experiences, it is only a general aspect of school life, the subject of special days or extracurricular projects.²⁶

Despite these relevant national differences, it is important to underline three aspects that the White Paper on Intercultural Dialogue places as pivotal in relation to intercultural education: the importance of multilingualism and history in the transmission of knowledge; the teaching of citizenship education; and the relevance of religious education.²⁷ We will see how these three specific dimensions have been implemented in some national experiences.

2.1. Intercultural education and the rethinking of knowledge

Since it promises to foster dialogue and to value the different cultures on an equal footing, intercultural education should imply a revision of the educational content of teachings being transmitted. History and geography certainly represent privileged areas in which to operate such a possible reconsideration. However, this change presents some risks, especially in relation to the teaching of the history curriculum, namely that of an instrumental use of it.

Traditionally, history teaching has often been seen as an instrument for nation building and because of that the focus is usually on the history of the specific state or, at most, of the continental area of reference.

A different historiographical approach, one centred on the general history of the human being and primarily aimed at analysing the interdependence between peoples and cultures and their contribution to universal heritage, has already emerged in the work of UNESCO immediately after World War II. It has, however, known only limited practical implementation. In particular, in the US context, there are two separate history programmes, one linked to US history and the other to events in the rest of the world. This subject, which was traditionally hinged on the Eurocentric model that prevails in Europe, has progressively taken on a different conception since the 1990s, more oriented towards the construction of a world history course.

Attempts of this kind have, however, proved unsuccessful in Europe. For example, in the Italian context, in 2001, a commission appointed by the then Minister of Education Tullio de Mauro and composed of historians, geographers, sociologists and economists, had developed a programme of human history that would have replaced the Eurocentric approach dominant until then. To this end,

²⁵ See Carrera (2009); Joppke, (2007: 1 ff).

²⁶ European Commission/Eacea/Eurydice (2019: 108-109).

²⁷ See Council of Europe (2008, 29-31).

a number of fundamental strands of analysis had been identified, which were then to be implemented according to a transversal and global approach. However, the project never got off the ground.²⁸

In the European context, therefore, history education from an intercultural perspective has not taken on the 'global' perspective previously outlined and has not moved away from the traditional focus on European historical facts. At most, some countries introduced topics or in-depth studies related to the events of those countries or cultures that are most common among pupils with a migratory background, also with the obvious intention of favouring their identification in the subjects studied.

This is the case in France, where school curricula have progressively included events or, in any case, given more attention to conflictual themes, such as slavery or the colonial past, at the same time maintaining a strong reference to the republican ideals and the universalism of rationalist values. However, the path has not always been straightforward: the introduction of sub-Saharan medieval history was met with protests and was removed from the national curriculum in 2015. Reinforcing ethnic sentiments and placing the individual into pre-packaged identities are consequences to be avoided.²⁹

What emerges, then, is the ambiguity of the teaching of history in the context of intercultural education: a vehicle to foster difference or, instead, a tool to promote integration and the ' *vivre ensemble* ' of citizens?

The two dimensions are intertwined and it is difficult to distinguish them. The guidelines published by the Italian Ministry of Education in 2007, entitled 'The Italian way for intercultural schools and the integration of foreign pupils', state: "History, geography, literature, mathematics, science, art, music, new communicative languages and other fields of knowledge constitute an inescapable opportunity to educate to diversity, allowing one to approach not only different contents, but also different structures and ways of thinking".³⁰

The perspective of valuing pluralism and diversity seems a more recessive aspect in the Council of Europe's documents, where the intention to use history as a tool to form an active and responsible citizen seems to prevail: "History teaching in a democratic citizenship should occupy a vital place in the training of responsible and active citizens and in the developing of respect for all kinds of differences, based on an understanding of national identity and of principles of tolerance".³¹

2.2. Intercultural education and citizenship education

The link between intercultural education, on the one hand, and citizenship education, on the other hand, has progressively emerged in the documents of both the Council of Europe and the EU. In relation to the former, in addition to the aforementioned White Paper, one may recall the adoption in 2010 of the *Charter on education for democratic citizenship and human rights education*, whose article 5(f) states: "An essential element of all education for democratic citizenship and human rights education is

²⁸ See Cajani (2015: 41 ff).

²⁹ See Tutiaux-Guillon (2021: 251 ff); Van den Kerchove (2011: 251 ff).

³⁰ See, Ministero Pubblica Istruzione, Osservatorio nazionale per l'integrazione degli alunni stranieri e per l'educazione interculturale (2007: 18).

³¹ Council of Europe (2008: 30).

the promotion of social cohesion and *intercultural dialogue* and the valuing of diversity and equality, including gender equality” (italics added).

As for the EU, in 2015, at the informal meeting of the ministers of education, the *Declaration on promoting citizenship and the common values of freedom, tolerance and non-discrimination through education* was adopted. Member States were called upon to “ensure the acquisition of social, civic and intercultural competences by children and young people, promoting democratic values, fundamental rights, social inclusion, non-discrimination and active citizenship”.³²

Despite these international documents, there is no precise definition of what citizenship education should consist. Thus, the ways in which states develop such teaching vary.³³

In that regard, scholars distinguish between ‘thick’ and ‘thin’ citizenship education.³⁴ In the former case, the teaching – usually named civic education – is axiologically neutral and based mainly on the transmission of knowledge of the relevant institutional system.³⁵ In the latter, the teaching, usually referred to as ‘citizenship education’, becomes more oriented towards the effective implementation of a series of civic values and the teaching methods are more based on interaction and the direct involvement of the learner.

The two distinct approaches evidently represent the extremes of a scale. Moreover, the subject in question may be conveyed through different teaching strategies: it can be a cross-curricular theme, a subject on its own or be integrated as a module in certain specific subjects.³⁶ States sometimes apply a combination of several methods, also because the teaching method may vary according to the school cycle to which it is applied. Despite all these variables, it may be assumed that the provision of citizenship education as a subject on its own could serve as an indicator of the strategic value attributed to it by the given national school system.

In this sense, in France, where there has been a tradition of teaching civic values since the French Revolution, following the Paris attacks, the government, led by then Prime Minister Valls, launched an action plan called “*la grande mobilisation de l’école pour les valeurs de la République*”. The plan aimed to strengthen the promotion of republican civic values, including the concept of secularism-neutrality. As of the 2015/2016 school year, implementing a 2013 law, the *Enseignement moral et civique* was introduced as compulsory teaching in all classes and school cycles.³⁷

Currently governed by Article 312-15 of the *Code de l’éducation*, the teaching in question is aimed, according to the above-mentioned provision, at making pupils responsible and free citizens, forming in them a critical spirit and adopting reflective behaviour. The syllabus, which is different in contents according to the school year, aims not so much at the passive study of aspects of the constitutional legal

³² See (EU) Council (2015)

³³ On this point, see European Commission/EACEA/Eurydice (2017).

³⁴ See McLaughlin (1992: 235 ff.); Kerr (1999, 5 ff).

³⁵ Italian Law No. 92 of 20 August 2019, *Introduzione dell’insegnamento scolastico dell’educazione civica* (G.U. 195, del 21.08.2019) seems to fall under this category. Article 1 states that civic education contributes to forming responsible and active citizens and that it “develops in school institutions knowledge of the Italian Constitution and EU institutions to substantiate, in particular, the sharing and promotion of the principles of legality, active and digital citizenship, environmental sustainability and the right to health and personal well-being” (our translation). The teaching is transversal to the various subjects, but it has an autonomous evaluation.

³⁶ See European Commission/EACEA/Eurydice, (2017).

³⁷ See Gaudin (2017).

system. Rather, as is evident from the equivocal use of the term ‘morality’, the goal is promoting a certain vision of society, with a strong focus on the principles of the French republican tradition. The course also covers the themes of religion, understood however as a fact, and non-religious thought. Neither Article 312-15 nor the syllabus, drawn up by the Ministry, speaks explicitly of interculturalism, although references to pluralism, including religious pluralism, and the issue of racism are an important component of the course.

Spain is also characterised by the introduction of a compulsory subject on citizenship education.³⁸

Sec. 2, lett. f) of the *Ley orgánica de Educación* no. 2 of 2006 mentions among the objectives of the Spanish education system “education in respect and recognition of Spain's linguistic and cultural plurality and interculturality as an enriching element of society”. However, no definition of interculturality is given and the concept curiously seems to be linked more to the linguistic and national pluralism characterising Spain historically than to the migration phenomenon.

Moreover, Art. 9 of the *Ley Orgánica sobre derechos y libertades de los extranjeros en España y su integración social* (LODYLE), as originally formulated, stated that, in relation to the education of immigrants, the aim was to reach their social integration and that this objective was also to be achieved “con reconocimiento y respeto a su identidad cultural”. However, this indent was removed by *Organic Law* No. 2 of 2009, which added a specific Article 2b dedicated to the integration of immigrants. Local authorities are called upon to guarantee, through specific training measures, “el conocimiento y respeto de los valores constitucionales y estatutarios de España, de los valores de la Unión Europea, así como de los derechos humanos, las libertades públicas, la democracia, la tolerancia y la igualdad entre mujeres y hombres”. This normative change seems to highlight that the migrants’ integration is not a two-way process, involving the society as a whole, but only, precisely, the immigrant component.³⁹

In the *Ley orgánica de Educación*, there is a repeated reference to the anti-discrimination dimension, which is to be read, however, as the absence of discriminatory treatment on the grounds of race and ethnic origin, according to a formal understanding of equality, rather than as a basis for interventions to promote cultural diversity. Social cohesion, promoted through the active knowledge of common civic values, is emphasised.

In this sense, the 2006 *Ley Orgánica de Educación* had already configured the introduction of a new, compulsory subject of citizenship education, with a specific focus on the topic of sex education and the rights of LGBT groups.⁴⁰ The introduction of the course had raised numerous reactions from the Catholic Church and more than 52,000 conscientious objection requests from parents. However, in three judgments in 2008, the *Tribunal Supremo* denied that the law had indoctrination purposes and therefore that a constitutional right to conscientious objection could be established in this case.⁴¹ However, the subsequent general elections and the change of political majority then led to the suppression of this new course.

In 2020, however, with a new amendment to Article 18 of the *Ley Orgánica de Educación*, a new cross-curricular teaching area called *educación en valores cívicos y éticos* was introduced for primary school (6-12 years), with contents referring to the Spanish Constitution, knowledge of and respect for human rights, education for sustainable development, global citizenship, equality between men and women,

³⁸ On intercultural education in Spain, see Aguado, Malik (2010: 279 ff).

³⁹ This is noted by Rodríguez García (2011:153 ff).

⁴⁰ See García Oliva, (2016: 183 ff).

⁴¹ See Carretero Espinosa de los Monteros (2009: 227 ff).

the value of respect for diversity and the social value of taxes. In compulsory secondary school (12-16 years old), the teaching takes up the same contents mentioned above, but with a special focus on ethical reflection.

Also in UK, with particular reference to the English and Welsh experience, one can note the marked attempt to promote teachings aimed at the formation of a 'good citizen', more or less sympathetic, more or less mobilised and committed to the common good.

Since 2002, a citizenship education course has been introduced in middle and high school cycles. Such a development, moreover, must be contextualised in the peculiar tradition of the British educational model. The latter, in fact, is characterised not only by a mixed offer of scholastic services – in which the public component is flanked by the private, often religiously oriented, one – but also by the territorially decentralised nature of the educational policies. These are administered by *Local Education Authorities* (LEAs). The national government role is that of allocating resources, on the one hand, and directing and controlling results, on the other. It is only with the *Education Reform Act* of 1988 that a national curriculum was adopted to guarantee common contents and objectives, at the same time, leaving school institutions large autonomy in teaching methods and in the choice of teaching materials.

From the point of view of educational institutions, as mentioned above, there is a marked integration between public and private schools. The latter are divided into *voluntary aided schools*, which are financed by the public up to 90% of their requirements, and *voluntary controlled schools*, which are fully supported by the public and therefore subject to the authority of the LEAs. Alongside these subsidised schools, there are also *independent schools*, which do not receive any public funding and are therefore not subject to compliance with the national curriculum.

Among private schools, those with a religious character are a very significant component and are referred to as *faith schools*. Depending on the level of funding guaranteed by the State, the possibility for these educational institutions to accentuate or not their degree of ideological adherence to a given religion or belief varies: in *voluntary aided schools*, the entire teaching staff can be selected in accordance with the ethical-moral approach of the institution, in derogation from the legal prohibition of discrimination on the grounds of religion and belief. Moreover, these schools may favour students belonging to a given religious denomination and/or those who commit themselves to following codes of conduct and lifestyles, even outside school hours, that are religiously connoted.⁴²

Traditionally, *faith schools* were reserved to the majoritarian religions (Anglican and Catholic). However, especially under the Blair government, the opening of *faith schools* of other religions (Islam, Judaism, Sikhism, Hinduism, Adventist organisations) was encouraged.⁴³ There has been an increasing criticism towards this model that has favoured a more pluralist offer in the name of multiculturalism: it would have been ill-suited to fostering integration and social cohesion.

This criticism has evidently been exacerbated by the events linked to Islamic terrorism, leading the central government to accentuate the functions of guidance and control and to increase, in a context that has always favoured decentralisation, national indications to promote educational initiatives aimed at fostering social cohesion in all schools.

⁴² See Vickers, (2016: 87 ff).

⁴³ See Benigni (2017: 113).

Sec. 78.1.a of the *Education Act 2002* provides that funded schools must ensure a curriculum that promotes “the spiritual, moral, cultural, mental and physical development of pupils at school and of society”, while sec. 25.5.b of the *Education Act 2002*, as amended in 2007, establishes a legal obligation for educational institutions to promote “community cohesion”.

In November 2014, the Ministry of Education issued the directive 'Promoting Fundamental British Values as part of SMSC in Schools'. With this government document, schools in the integrated system were called upon to realise their statutory duty to promote the spiritual, moral, social and cultural (SMSC) development of pupils through initiatives aimed at promoting ‘fundamental British values’. The latter were identified in the following concepts: “democracy, rules of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs”.⁴⁴

The reference to ‘fundamental British values’ is not new and is linked to another government policy, called PREVENT, which emerged in connection with the terrorist attacks. This strategy imposes obligations on public officials, including school officials, to report individuals deemed at risk of radicalisation in schools. While, in the first phase, the reporting activity concerned forms of violent extremism, since 2011 it has also been extended to non-violent extremist activities, *i.e.*, the dissemination of opinions contrary to ‘fundamental British values’, which can provoke an atmosphere conducive to terrorism.

The government's strategy of relaunching civic values as an integration tool is not always pursued consistently. For example, the compulsory promotion of ‘fundamental British values’ is placed as a transversal teaching initiative and is not promoted in the context of the citizenship education course, which has been introduced, as mentioned, compulsorily in all schools since 2002. Moreover, a House of Lords report critically observes how the introduction of such a course has had very little impact on schools, which have sometimes limited themselves to scheduling it as part of other existing courses and in any case without giving it adequate prominence.⁴⁵

It is also evident that the main objective of the various government interventions was precisely to avoid religious fundamentalism. We read, for example, in the 2014 document on the promotion of ‘fundamental British values’: “It is expected that pupils should understand that while different people may hold different views about what is ‘right’ and ‘wrong’, all people living in England are subject to its law. If schools teach about religious law, particular care should be taken to explore the relationship between state and religious law. Pupils should be made aware of the difference between the law of the land and religious law”.⁴⁶

In the Netherlands, too, a similar pattern can be observed. Characterised by a mixed school system – with a public school system that is strictly neutral in terms of religious instruction, and another of private character, predominantly Catholic and Protestant, but entirely financed by the State, in accordance with Article 23 of the Constitution⁴⁷ – the Netherlands has fluctuated considerably with

⁴⁴ See p. 2. The document can be found at <https://www.gov.uk/government/publications/promoting-fundamental-british-values-through-smsc>. On this topic, see Bamber, Bullivant, Clark and Lundie, (2018: 433 ff); Habib (2017).

⁴⁵ House of Lords, Select Committee on Citizenship and Civic Engagement (2018: 27 ff).

⁴⁶ See p. 4. The document is available at <https://www.gov.uk/government/publications/promoting-fundamental-british-values-through-smsc>

⁴⁷ See de Wolff and Huisman (2015, 461 ff.); van Bijsterveld (2011: 363 ff.); Benigni, (2017: 150 ff).

regard to the school integration strategy for minors with a migratory background, especially those of Islamic religion.⁴⁸

Since 1981, a compulsory course called ‘Geestelijke Stromingen’ (literally Spiritual Movements) has been introduced in primary schools. The teaching was aimed at providing objective information about the religious phenomenon as a whole. However, at that time, immigration was characterised by still recent family reunifications. Thus, the main problem was the acquisition of language skills in Dutch by foreign children. In order to cope with this situation, following the French ELCO model, during the 1980s and 1990s the State financed extracurricular courses in the language and culture of the immigrants’ countries of origin, on the assumption that this would also allow a more rapid acquisition of skills, including linguistic skills in Dutch.⁴⁹ In the meantime, however, the organisational capacity of communities of Islamic origin has been increasing and they have started to open more and more religiously connoted schools, fitting into the traditional context of Dutch pillarisation⁵⁰.

However, it was argued that this approach, somehow inspired by a multiculturalist logic, favoured the radicalisation of students and their poor integration.⁵¹ Since the early 2000s, therefore, in conjunction with the terrorist attacks in the US and in various European capitals, the trend has been to favour initiatives aimed at social cohesion: on the one hand, investments linked to the promotion of teaching in the language and culture of origin were suspended, partly because students no longer had the necessary language skills in Arabic, and on the other hand, a new compulsory course on citizenship education was introduced in 2006.⁵² This teaching also includes a component on religions and non-religious movements, although scholars note the superficial treatment of religious themes.⁵³

2.3. Intercultural education and religion

As noted, courses or teaching initiatives related to citizenship education often include contents related to religious themes. On this point, the international system of human rights protection guarantees that States, in exercising their functions in the field of education and teaching, must respect the right of parents to provide such education and teaching in accordance with their religious and philosophical convictions.⁵⁴ This does not imply a corresponding obligation on the part of the State to guarantee at public school a religious teaching to anyone who requests it, but, rather, that the State is bound by a duty to act neutrally and impartially in relation to the teaching of aspects that may be related to religion, refraining from any critical approach towards the different religious beliefs or practices and avoiding any form of indoctrination. Within these limits, a State is not forbidden from imparting, even compulsorily, moral, ethical or, indeed, citizenship courses.⁵⁵

⁴⁸ See Ter Avest (Ina) and Rietveld-van Wingerden, (2017: 293 ff).

⁴⁹ *Ibid.* (296).

⁵⁰ See Driessen and Merry, (2006: 201 ff).

⁵¹ See Karsten, (2006: 228 ff).

⁵² See Leeman and Pels, (2006: 23 ff).

⁵³ See Leeman, (2008: 50 ff).

⁵⁴ See Art. 18 of the International Covenant on Civil and Political Rights; Art. 2, Prot. 1 of the European Convention for the Protection of Human Rights and Fundamental Freedoms.

⁵⁵ Human Rights Committee (1993).

Certainly, however, the dividing line can be a thin one and, as we have seen in UK with the case of the PREVENT project and the ‘fundamental British values’, education can become an instrument not only of promotion of social cohesion, but even of social control. It can influence the life conduct and the way of thinking of the members of a religious denomination so that they adapt to the set of civic values characterising the country.⁵⁶

Secondly, on a more strictly pedagogical-educational level, although religion undoubtedly represents a central element in the definition of a person's culture and identity, it is equally true that knowledge of religions as a historical, cultural, artistic and social fact is important for the formation of every individual, regardless of his/her membership of a given religious group.

The Council of Europe has been moving in this direction for some time.⁵⁷ In 2008, the Committee of Ministers adopted a Recommendation to Member States concerning the dimension of religious and non-religious beliefs in the context of intercultural education.⁵⁸ Despite efforts to promote a common understanding among States Parties, the recommendation was essentially ignored by the States.⁵⁹ This is not surprising since it is a sensitive issue and States enjoy a wide margin of discretion in this regard.

In fact, there are several factors that explain the diversity of solutions at the national level.⁶⁰ Firstly, although international norms do not impose a given system of State-Church relations, they do require States to be neutral, in the sense of guaranteeing the right to religious freedom to all and on equal terms. However, this obligation can be pursued either with a rigidly neutralist approach, which excludes any prominence of religion in the public sphere and hence also in schools (France, the Netherlands), or, in the opposite direction, according to a positive conception of secularism, which implies the recognition and support of the individual religious dimension as a public interest and therefore admits state intervention in support of it.

However, this dividing line is not a clear-cut one. It is also relevant whether the school system is public or is, instead, mixed, with a strong component of private education with a religious background, but financed by the state. The already mentioned case of the Netherlands is a good example with private but publicly financed institutions run by Islamic or Jewish religious groups. By contrast, countries such as Italy, with a prevalent public school system, guarantee religious instruction in State schools, but limit it, *de facto*, to the religion of the majority.⁶¹

⁵⁶ The issue obviously intersects with that of autonomy between the State and religious confessions. It must be emphasised that some confessions, precisely in the name of this autonomy, reject religious instruction of a denominational nature provided by state schools, claiming the right/duty of individual confessions to provide it separately. At the same time, some of these denominations do not oppose teaching about religions on a cognitive basis. This is, for instance, the approach of the Waldensian Church. See: https://www.chiesavaldese.org/aria_cms.php?page=154

⁵⁷ Council of Europe, (2005).

⁵⁸ Council of Europe, Committee of Ministers (2008).

⁵⁹ See Jackson (2014: 7 ff).

⁶⁰ See Fiorita (2012: 37 ff); Benigni (2017).

⁶¹ Still different is the case of Belgium, which I refer to in the text, that guarantees a plurality of State-recognised religious denominations religious instruction in State schools. Moreover, albeit less intensively than in the Netherlands, there are private schools, but financed at least in part by the state, with both Islamic and Jewish religious denominations.

Thus, beyond the initial models, it is to be seen in practice how and with what effectiveness the right to religious instruction is guaranteed to religious minorities.

Nevertheless, two basic modes of religious instruction at school emerge in Europe. The first is the teaching 'of' religion, i.e., a teaching oriented towards the denominational aspects of a given religion, according to the choice made by parents. The second is teaching 'about' religion, that is, the religious fact *per se*, with a cognitivist approach, encompassing the views of the main religions, but also agnostic/rationalist/humanistic thinking.⁶²

The first option, if such a teaching is offered on a truly equal basis and not only to members of the majoritarian religion, is certainly a means of promoting the cultural identity of the individual. However, insofar as it does not necessarily provide an understanding of other religions and outlooks on life, it seems to be at odds with intercultural education's aims of promoting dialogue and mutual understanding.

By contrast, since the teaching 'about' religion is not focused on confessional aspects, there is the risk of a watering down of religious sensibilities and of emphasising the more superficial and perhaps folkloric aspects of them⁶³. In this sense, also in order to foster social acceptance by members of minority religious groups, the involvement of the latter in defining the content of such courses may become strategic.

It is precisely in this direction that the English and Welsh experience seems to be moving.⁶⁴

Religious instruction even in public schools is a defining feature of the British legal system. The strengthening of government initiatives aimed at fostering the promotion of civic values has been combined with the emergence of an approach to religious instruction based on knowledge of the religious factor, rather than on strictly doctrinal/catechistic profiles. This process is, moreover, combined with the devolution of the relative administrative functions to the *Local Education Authorities* (LEAs).

The definition of the religious education syllabus and the choice of textbooks therefore take place locally, but in close contact with local religious representatives. In particular, a *Standing Advisory Council Religious Education* (SACRE) is set up in each LEA. SACRE is composed not only of a representative of the LEA itself and the teachers in the area, but also of a representative of the Anglican Church and one of the other religious denominations, in proportion to their size and presence in the area.

This solution, which favours the principle of cooperation with the various religious organisations at the local level, has gradually been combined, since the 1990s, with the formulation of guidelines at the national level. The latter, drawn up by the government in collaboration with the national representatives of the major religious groups, while not binding on the local level, have in fact ended up having a considerable influence on local programmes. The guidelines have gradually placed emphasis on common themes that cut across all religions, with a view to fostering mutual respect and tolerance.⁶⁵

However, according to the independent survey conducted on the quality of religious education,⁶⁶ while this multi-religious and syncretic approach has strengthened students' awareness of the religious

⁶² See Cumper, (2016: 207 ff). On this subject, also Pépin (2009 e 2015: 95 ff); Franken and Loobuyck (2011).

⁶³ See Benigni (2017: 227 ff).

⁶⁴ See McClean (2011: 503 ff.); Benigni (2017: 225 ff).

⁶⁵ This is noted by Benigni (2017: 220 ff).

⁶⁶ Office for Standards in Education, Children's Services and Skills, (OFSTED) (2010 - 2014).

and cultural diversity of society, it has not, conversely, enabled a more intimate and profound understanding of the different religions. At most, the teaching has allowed a superficial knowledge of the various rites and festivities, misaligned with the deeper meaning they have for living.⁶⁷

The tendency to favour cognitive, rather than confessional, religious education, characterises, as mentioned, the current approach of the Council of Europe⁶⁸ and that of other international organisations in the European area.⁶⁹ It is also facilitated by the case-law of the European Court of Human Rights.⁷⁰

The latter, in fact, does not prevent States from offering a system of public religious education of a confessional nature also on the basis of agreements with the various religions present in the country. In this hypothesis, however, by virtue of Art. 2, Prot. 1 and Art. 9 ECHR, parents must be free to decide not to avail themselves of the instruction. By contrast, according to the doctrine elaborated in the well-known *Folgerø* case,⁷¹ it is possible for States to offer courses on morals, ethics or, indeed, on the religious fact, even of a compulsory nature and therefore without the possibility of dispensation, provided they do not have any indoctrinating approach.⁷²

The combination of these two aspects has led many States that previously offered confessional courses on religion to abandon this route in favour of compulsory teaching for all, but pluralist and multi-confessional.

This is, for instance, the case in Norway⁷³ and to some extent in French-speaking Belgium.⁷⁴ In Belgium, education has been devolved to the three Communities since the constitutional revision of 1988, but the political agreement underlying the 1958 *pacte scolaire* remains in force and it has been substantially codified in Article 24, paragraph 1 of the Belgian Constitution. According to this provision, public authorities undertake to assume the costs of denominational religious instruction in public schools in relation to Catholicism and other recognised religions (initially Anglicanism, Judaism, Protestantism), as well as non-denominational moral teaching.

The arrival of migratory flows from both Arab and Orthodox countries, particularly from the former Yugoslavia, led public institutions to come to agreements with these migrant communities and to provide, in 1974 and 1985 respectively, courses in Islamic and Orthodox religion in public schools. This approach is judged in doctrine as expressive of a policy of multiculturalism: the different religious cultural communities are assumed to be pre-constituted entities each of which agrees on a specific arrangement for its own religious teaching, without seeking a synthesis between the different religions.

The attendance of denominational religious courses is on a voluntary basis. However, in both Flanders and Wallonia, a legal intervention was made for the establishment of a secular philosophy and morality course, the contents of which are established in agreement with atheist and rationalist associations. In practice, therefore, the system required pupils to attend either the confessional religion

⁶⁷ See Benigni (2017: 227-228).

⁶⁸ See Jackson (2018: 85 ff.); Lozano (2013: 369 ff).

⁶⁹ OSCE/ODIHR (2007).

⁷⁰ See Fokas (2019); Evans (2008: 449 ff).

⁷¹ European Court of Human Rights (GC), *Folgerø and others v. Norway*, 29 June 2007.

⁷² Leigh (2012:192 ff).

⁷³ Skeie (2017).

⁷⁴ See Delgrange (2018: 107 ff).

course, depending on the parents' option, or the non-denominational morality course, the content and educational approach of which was, however, strongly characterised in an atheist-rationalist sense.

Following the indications of the case law of the European Court of Human Rights in *Folgerø*, in 2015, the Belgian Constitutional Court ruled in Judgment No. 34 that the legislation of the French Community was unconstitutional because it did not guarantee that the morality course was taught in an objective, critical and pluralist manner. For this reason, in the French Community, a new compulsory course on philosophy and citizenship was introduced in 2015. In essence, religious and/or non-denominational moral teaching is reduced to one hour per week and becomes optional. Those who choose this option must still attend the philosophy and citizenship course for at least one hour per week. Those who request dispensation from the non-denominational religion or morals course will be obliged to attend the philosophy and citizenship course for at least two hours.

As far as the content of the course is concerned, it is intended to develop skills and promote the learning of ethics, included the various currents of thought, philosophies and religions in historical and sociological terms. Democratic functioning is also included and in this last area, reference to the intercultural dimension appears. Indeed, teaching must develop “a capacité de vivre ensemble de manière harmonieuse et respectueuse dans une société démocratique et interculturelle, de s'y insérer et de s'y impliquer activement”.⁷⁵

3. Intercultural education in Central and South America

As López observed, the term 'intercultural education' has become part of the legal lexicon and/or educational policies of at least eighteen Central and South American states.⁷⁶ Nevertheless, it is a notion whose content varies both geographically and historically.⁷⁷

In this regard, unlike the European context, where the concept was born and developed as an educational response to the challenges arising from the increasing presence of pupils with migratory backgrounds, in Central and South America intercultural education is closely linked to the integration of indigenous peoples. It is also conceived as a political project aimed at overcoming, at least in its intentions, the historical subalternity of the indigenous peoples vis-à-vis the white and/or mestizo component of the population. Intercultural education, therefore, acquires an emancipatory and consciousness-raising value for the indigenous population that transcends the educational dimension alone. To put it another way, intercultural education in South America has been and still is the main vehicle through which the indigenous movements first became aware of and valued their culture and then later claimed, through education, access to positions of greater prominence and power in civil society.

⁷⁵ Communauté française, *Décret relatif à l'organisation d'un cours et d'une éducation à la philosophie et à la citoyenneté*, 22 October 2015, in *Moniteur Belge* 9/12/2015.

⁷⁶ See López (2009).

⁷⁷ See Guerra García and Meza Hernández (2015, 113 ff).

This view is confirmed by some preambles of sectoral legislation.⁷⁸ Moreover, intercultural education today concerns not only the first degrees of the educational process, but university education itself, being precisely conceived as a tool for training the indigenous political class.

Because of its relation with indigenous emancipation, intercultural education policy, unlike in Europe, has often been promoted as a demand from the bottom, constituting precisely one of the elements of political claims of the indigenous movement, on a par with the use of natural resources, the possibility of indigenous jurisdictions, and the promotion of different cosmogonies and philosophies of life.⁷⁹ At the same time, however, political-state institutions have gradually opened up to the new identity demands to the point of supporting them. Several factors have played a role in this regard.

Firstly, the return to democracy in many Latin-American States in the late 1980s and early 1990s coincided with a revisiting of the idea of the correspondence between State and Nation, which the various Latin American constitutions had taken from European constitutionalism.⁸⁰ This entailed a stronger recognition of ethnic and linguistic pluralism and, consequently, a greater role for public policies aimed at preserving and protecting the cultural diversity of indigenous and Afro-descendant peoples, a feature that connotes the new Latin American constitutionalism.⁸¹

Secondly, international law has devoted increasing attention to the demands of indigenous peoples.⁸² Almost all the Central and South American States ratified the 1989 ILO Convention on the Rights of Indigenous and Tribal Peoples, whose articles 26, 27 and 28 promote in fact intercultural education contents, although not explicitly referring to the notion. This has had an undoubted influence on the educational choices of several states.

This apparent convergence – of indigenous claim, on the one hand, and state/governmental instances, on the other – does not imply an equal understanding of intercultural education.

Intercultural education, promoted by political institutions, does not often go beyond educational initiatives designed and directed at the indigenous population, aimed primarily at the learning of their minority language. From this point of view, it is no coincidence that in practically all Central and South American countries, intercultural education is combined with the adjective bilingual. Thus, the centrality of language learning for maintaining cultural identity is emphasised. However, these measures have a territorial scope of application and they depend on the concentration of the members of a given indigenous group in a given geographical area. Thus, the knowledge of ancestral idioms is not promoted as the cultural heritage of the national community as a whole and, ultimately, the cultural and social subalternity of indigenous groups is not affected.

Because of that, indigenous movements accuse bilingual intercultural education to be actually a tool for keeping the traditional power structure of ethnic groups intact and promoting an awareness of diversity that is only superficial or, worse, cosmetic. According to the indigenous movements, the

⁷⁸ See, for example, in Ecuador, the *Ley Organica de Educación Intercultural* of 31 March 2011, which states: “Que una transformación revolucionaria del Ecuador requiere primordialmente de una transformación revolucionaria de la educación de sus niños, niñas, adolescentes, hombres y mujeres de toda edad, a lo largo de toda su vida; que les permita conocerse, reconocerse, aceptarse, valorarse en su integralidad y su diversidad cultural”.

⁷⁹ See Lanni (2013: 159 ff.); Bagni (2017); Baldin (2019).

⁸⁰ See Lanni (2011: 56 ff).

⁸¹ Cf. De Sousa Santos (2010); Gargarella and Courtis (2009); Jaramillo and Doniush (2013).

⁸² See Pisillo Mazzeschi (2008: 19 ff).

ultimate goal of intercultural education should be to reshape national educational policy, in order to reach an educational project that is addressed to the generality of students, not only the indigenous ones. Intercultural education should entail much more than learning minority languages. It requires a reformulation of the educational content and methods so to include aspects specific to the indigenous tradition. It should be a synthesis of the traditional European-based knowledge with that of indigenous group. Only this new epistemic foundation would overcome the cultural and social subalternity of indigenous groups.⁸³

The intercultural education discourse in the Central and South American context⁸⁴ started with the so-called 'bilingual education'. Developed at the beginning of the 1950s as an educational approach specifically aimed at the indigenous population, bilingual education was aimed, through the use of the indigenous idiom as a vehicular language, at guaranteeing these communities a certain knowledge of Spanish, which was the only recognised official language.

The ultimate goal, therefore, was not the promotion and protection of a cultural identity trait proper to indigenous groups, but the learning of Spanish. The final goal was assimilation. Indigenous people were considered as subjects not fully capable of understanding and in need, therefore, of a guardianship action on the part of the State.

This view was evident, for example, in the Peruvian Constitution of 1979. Article 161 did recognise the existence of campesino and native communities and defined 'Quechua' as the official language in those regions where this idiom is predominant, but it also held that the state "advocates the cultural overcoming of its integrating members".⁸⁵

This strict assimilationist approach gradually gave way, towards the end of the 1970s, to the emergence of 'bilingual bicultural education'. Bilingual education and consequently the formation of a teaching class that masters both Castilian (or Portuguese) and the relevant native language allowed the indigenous movement to realise the importance of controlling the educational processes, in order both to maintain the ethnic/cultural identity of the indigenous peoples and to convey, in the new generations, the importance of certain values proper to the indigenous culture.

This opened the way, especially in Mexico, to the 'bilingual and bicultural education' policy.⁸⁶ The adding of the adjective 'bicultural' indicates a change in perspective: the focus of the learning is no longer only the native language, but culture, which includes lifestyles, worldviews, and methods of transmitting knowledge typical of the indigenous tradition.

However, as the use of the prefix *bi-* makes evident, bilingual and bicultural education policy was based on the opposition between the indigenous and the 'other' that ended up crystallising, in a pre-packaged and immutable identity, the indigenous culture, without seriously affecting the consolidated power positions of the 'other'.

In analogy to what would happen in Europe in relation to multicultural educational policies, the subsequent development started from questioning the issue of identity and belonging. Many indigenous people were now resident in large urban centres, so that they could no longer claim to have a monolithic cultural identity. This led the indigenous movement itself to rethink the bilingual and bicultural model in favour of the 'bilingual and intercultural model'.

⁸³ See López (2009).

⁸⁴ On which, in particular, López (2009: 129 ff) and his periodization which we refer to later in the text.

⁸⁵ See Brunet Ordoñez Rosales (2013: 429 ff).

⁸⁶ See Mateos Cortés (2011).

The latter stands as a third way between the assimilationist model, which was inherent in the bilingual education first approach to indigenous diversity, and the identity-driven approach that characterises the ‘bilingual and bicultural’ phase.⁸⁷ The change in perspective is due to the indigenous movement's awareness that while the bilingual and bicultural approach guaranteed the survival of the indigenous community, it did not challenge the hierarchies and power structures of colonial society. Indigenous communities needed to have a good education (also) in Spanish, so that they could be admitted into the dominant society and change the power mechanisms from within, overturning the consolidated social hierarchy.

This evolution of the indigenous movements coincided with a change in the approach of the state institutions. As noted above, in the transition from authoritarian regimes to the newfound democracy, public institutions started to recognise, albeit with different accents, the linguistic and ethnic pluralism inherent in their national communities and lay the foundations for a decisive overcoming of the assimilationist educational policies.

The Constitutions adopted at this time all signal this progress.

While it does not use the term *interculture*, the 1988 Brazilian Constitution states, nevertheless, in its Article 210.2, that “regular fundamental education shall be administered in the Portuguese language, ensuring indigenous communities also the use of their mother tongues and learning processes” (our translation).

The 1991 Colombian Constitution also does not explicitly mention intercultural education. However, Article 7 states that the State recognises and respects ethnic diversity and Article 10 holds that “the language and dialects of ethnic groups are also official languages in their territories. Teaching in communities with their own linguistic traditions shall be bilingual” (our translation).

The 1993 Peruvian Constitution enshrines in Article 2, c. 19 the right of everyone to his/her ethnic and cultural identity and provides in Article 17 that “the State shall promote bilingual and intercultural education, according to the characteristics of each area. It preserves the country’s diverse cultural and linguistic manifestations. It shall promote national integration” (our translation).

However, it is certainly in the Constitutions of Ecuador and Bolivia that interculturality is pivotal, to the extent of becoming a character of the State constitutional identity⁸⁸ and not only of educational policies. In these two countries, the emancipation of the indigenous population is more pronounced and thanks to the numbers, it may affect the channels of political representation. Thus, intercultural education takes on a different meaning starting with the name: no longer “bilingual and intercultural education”, but “intercultural and bilingual education”.

The change is not only nominal, but conceptual. Bilingual education must ensure that the main language of instruction is that of the specific ethnic/national group and that Spanish is used as the vehicular language. Because of that, it is necessarily diversified both territorially and linguistically, depending on the ethnic group to which is addressed. By contrast, intercultural education is addressed to all schools and all pupils, irrespective of their indigenous origins.

The intercultural educational project concerns both teaching subjects and teaching methods. As for the former, this includes aspects linked to indigenous cosmogony, the study of mathematics according to Inca models and the man-nature relationship in the natural sciences. As for the latter,

⁸⁷ See López (2009: 140 ff.); Dietz and Mateos Cortés (2011: 78 ff).

⁸⁸ See Bagni (2017).

traditional frontal teaching is flanked by more properly experiential teaching, typical of the indigenous tradition.

The 2011 Ecuadorean Organic Law on Intercultural Education moves along these evolutionary lines and can be taken as a paradigmatic example. On the one hand, Article 6.1 (c) and (l) imposes on the State the obligation to ensure that the national education system as a *whole* is intercultural, and, to this end, it provides for the inclusion in the school curricula of the progressive teaching of at least one ancestral language, as well as the systematic study of the non-official national histories.

On the other hand, in relation to indigenous communities, the system of bilingual intercultural education is outlined. In this regard, the law provides for a rather hierarchical structure, assigning the central authorities (the Ministry of Education and the *subsecretaría del sistema intercultural bilingüe*) the tasks of planning, organising, directing and controlling. One of the purposes envisaged by the law is to develop specific *curricula* in each of the recognised ancestral languages, *curricula* that individual schools must then implement. To this end, a series of technical structures with advisory functions have been envisaged, such as the *Consejo Plurinacional del sistema Intercultural bilingüe* and the *Instituto de idiomas, ciencias y saberes ancestrales de los pueblos y nacionalidades*. This effort led to the adoption of 14 national intercultural bilingual *curricula*, which flank and specify the *Modelo del Sistema de Educación Intercultural Bilingüe* adopted back in 2013.

Empirical research carried out *on site*, however, leads one to doubt that this intercultural turn in a universal sense actually took place. As a matter of fact, in non-indigenous schools, only a nominal, at best folkloric, adaptation of school curricula and teaching methods occurred.⁸⁹

Thus, the realisation of a project of intercultural education ‘for all’, conceived as an effective synthesis of the encounter of the historically dominant white and mestizo cultures with the indigenous one is still underway.

4. Conclusion

Intercultural education, as a policy, maintains an unresolved and perhaps irresolvable ambiguity in its objectives, *i.e.*, the promotion of diversity and pluralism *vis à vis* social cohesion. Although the subjects of reference change – students with a migratory background in the European case, indigenous peoples in Central and South America – interculturalism moves in both cases from the idea of overcoming both assimilationism and the separateness of identities that is often assumed to be a consequence of multiculturalism.⁹⁰

The search for this third way seems to move, however, along different coordinates. On the one hand, the South American context, at least in some national scenarios, seems to actually admit the possibility of building a new integrative model, based on the synthesis of the contributions of the two cultural paradigms characterising the society, the white-mestizo and the indigenous one. On the other hand, the European experience is more focused on the promotion of allegedly common civic values, but which in reality are typical of the culture of the country of reference. This process takes place

⁸⁹ See Granda Merchán, (2009: 57 ff.); Paronyan and Cuenca Díaz (2018).

⁹⁰ See Barberis, (2011: 477 ff).

according to a tendency of veiled 'ideological assimilationism'⁹¹ that becomes increasingly marked in those States that have experienced phenomena of religious radicalisation and terrorist episodes. Diversity is recognised, but this is referred generically to the individual as such, detaching him, so to speak, from the social, ethnic, religious group of reference.⁹² It becomes a diversity that is less identitarian and essentialist - because it does not refer to a social group identifiable on the basis of ascribed characteristics - and therefore more malleable, flexible and, in the end, comparable and manageable the same way as many other forms of diversity to be found in schools and in society (of origin, gender, social level, school history, disability).

Both in South American and in the European experience, intercultural education as a policy gets a rhetorical, if not utopian, characterisation. There is certainly a discrepancy between what is the promoted objective and the actual implementation of it, starting with the often inadequate training of the teaching staff. This seems consubstantial to the fact that *macro* interculturalism, understood as policy, must be filtered by a 'micro' interculturalism, which becomes daily practice and which is inevitably affected by the specificity of teachers, learners and each school institution.

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⁹¹ See Perocco (2003: 211)

⁹² See Barberis (2011: 477-478).

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davide.strazzari@unitn.it

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