A COMPARATIVE STUDY OF RELIGIOUS EDUCATION in STATE SCHOOLS in ENGLAND AND TURKEY:

The Partnership between State and Religion, Laws regarding Religious Education and Religious Education Curricula

Abdurrahman Hendek

MA in Religious Education, King's College London

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ABSTRACT

The dissertation compares religious education in state schools in England and Turkey in terms of the partnership between religion and state, the laws of England and Turkey relating to religious education and the religious education curricula in England and Turkey. Although the dissertation describes the history of religious education in the two countries, its focus is the current situation, as history shapes the present. The dissertation argues that comparative studies should be concerned with both the similarities and differences and the reasons for them. Therefore, the dissertation seeks to find the main similarities and differences in religious education in state schools in England and Turkey and account for these differences and similarities.

The rationale behind this dissertation is that there is a growing argument for comparative studies and despite that, the number of the studies which compare religious education in England and Turkey is insufficient. In addition, those that exist lack satisfactory explanations for any similarities and differences found.

The dissertation highlights that there are similarities between Turkish and English religious education due to the fact that they face the same international trends and that they are the members of the same international organisations. The fundamental similarities are that religious education is a separate school subject and has its own curricula, and both countries embrace non-denominational, non-confessional, plural and child/learner-centred religious education. Nevertheless, there are certain differences between English and Turkish religious education because of their different contexts. The type of nation state, the relationship between state and religion, their legal systems and the degree and the nature of pluralism distinguish Turkey and England from each other in terms of religious education. The fundamental differences are that there is a universal right to withdraw in England, but a limited right in Turkey, making religious education a right in England, but a right and duty in Turkey, and the English system represents diversity with its different kinds of state schools and religious education while Turkey holds on to uniformity.

The possible implications of the dissertation are that the dissertation informs international organisations which make policies on religious education. These organisations should consider the terminological differences as well as contextual differences that the dissertation points out when making policies on religious education. Moreover, the criticisms made in the

dissertation can accelerate the process of change which, it is believed, would make Turkish and English religious education better. Finally, the dissertation is a valuable starting point for future research.

ABBREVIATIONS

DfE: Department for Education

ECHR: European Court of Human Rights

EU: The European Union

IPSs: Imam and Preacher Schools (Imam-Hatip Okulları or Liseleri in the original Turkish)

LAS: Locally Agreed Syllabus

LAs: Local Authorities

LEAs: Local Education Authorities

MEB: Milli Eğitim Bakanlığı (the Ministry of National Education)

OECD: Organisation for Economic Co-operation and Development

OSCE: Organization for Security and Co-operation in Europe

PSHE: Personal, Social and Health Education

QCA: Qualifications and Curriculum Authority

SACRE: Standing Advisory Council for Religious Education

TBMM: Türkiye Büyük Millet Meclisi (the Grand National Assembly of Turkey)

The REDCo: Religion in Education. A contribution to Dialogue or a factor of Conflict in transforming societies of European Countries

WWII: The Second World War

1. INTRODUCTION

Religious education in state schools in Turkey has over time changed in terms of name, status and syllabus. In 1924, when the Turkish Republic was established, religious education was inherited from the Ottoman Empire. Therefore the aims and syllabus and books remained the same in the initial phase of the republic. The cultivation of Islamic faith was the foremost objective and religious education was based on the Hanafi School, one of the four schools of law within Sunni Islam. However, since the 1920s, religious education in Turkey has changed dramatically; there is now a non-denominational, non-confessional, child-centred religious education.

Likewise, the basis of religious education in England has undergone a shift from the theological to the educational. There is now a non-denominational, non-confessional, child-centred and multi-faith, instead of confessional, content-centred and single-faith, religious education.

In England and Turkey, religious education is a separate and compulsory school subject and it has its own curriculum. This fundamental similarity and other similarities they have, like non-denominational, non-confessional and child-centred religious education, should not give the impression that England and Turkey have the same religious education. These countries are different in terms of society, the relationship between religion and state, the degree of plurality and the type of secularism. Hence, their religious education differs on many points.

Similarities are needed for comparative studies, since, as Schweitzer (2004: 192) argues, 'the phenomena to be compared must have something in common'. The similarities noted above suggest that religious education in England and Turkey can be compared.

Comparative studies should be concerned with both the similarities and differences which the phenomena have and the reasons for these similarities and differences. Hence, the dissertation will investigate the differences and similarities between English and Turkish religious education and the reasons for them.

1.1. WHY IS THERE A NEED FOR COMPARATIVE STUDIES?

In the field of religious education, there is a growing argument for comparative studies (e.g. Schweitzer, 2004). First of all, there is relatively little work in the field (see the chapter 1.2.).

It is believed that comparison can make us think of questions which do not happen in our context (Schreiner, 2009). For instance, contemporary England takes the right to withdraw from religious education for granted (it dates back to the 1860s), and has never experienced an absence of it, but Turkey had abolished the right to withdraw in 1982. By virtue of a comparative study, both England and Turkey will learn from each other's experiences.

Comparative studies are also needed as different countries are affected by the same global trends such as secularisation, globalisation and plurality. As a result of these trends, religious education in Europe is converging (Willaime, 2007). This dissertation will show how these trends have affected England and Turkey, and how far their religious education has converged.

Furthermore, comparative studies can act as a catalyst for reform of curricula and relevant legislation, because comparative studies can be used to critique a national system (see Alberts, 2007).

Last but not least, a more comprehensive understanding of religious education has become desirable because of the processes of Europeanisation (Schweitzer, 2004). England and Turkey are members of the Council of Europe and the OSCE. A comparative study will inform these organisations about the similarities and differences between Turkish and English religious education, and, consequently, enable these organisations to make more comprehensive policies on religious education.

1.2. LITERATURE REVIEW

Schweitzer (2004) argues that in spite of increased interest in religious education, there is little work on comparative religious education. The reasons for this shortage are that comparative studies are demanding and the barrier of language poses a great challenge.

There is growing interest in religious education of European countries in Turkey, especially after being accepted as a candidate for membership of the European Union. Turkish

academics have begun to seek ways to adapt current religious education to suit the EU. For instance, in 2001, a conference on new methodological approaches in religious education was held in Ankara. None of the presentations at the conference made comparisons between England and Turkey, but Turkish academics had a chance to listen English religious educationalist like John Hull (Hull, 2004).

Kaymakcan's book (2004) was the first study to pave the way for a comparative work on Turkish and English religious education. While the book did not make any direct comparison, it helped Turkish academia understand English religious education.

The pioneering comparative research on religious education in England and Turkey was published in 2009 by Alakuş and Bahçekapılı. While the purpose of the book was to consider different aspects of religious education separately, it did tangentially approach comparison between the two countries (Alakuş and Bahçekapılı, 2009). However, the book lacks in providing an explanation for the similarities and differences. In addition, it is also heavily dependent on Turkish sources (mainly Kaymakcan, 2004) and personal observations of English education and its religious education system.

As can be seen, the number of studies on comparative religious education between England and Turkey is insufficient. In the field of religious education, there are other comparative studies which might be useful to mention.

Kuyk, et al. (2007) studied current trends in religious education in Europe, outlining religious education in thirty-three European countries, Turkey and England included. What the work had in breadth, however, lacked in detail.

Alberts (2007) compared English and Swedish religious education, while taking account the Netherlands, Germany and Norway. Alberts (2007) argued that multi-faith and integrative religious education are synonymous, but she prefers the term 'integrative' because it also includes non-faith. She investigated different approaches to religious education in Sweden and England in order to critique German religious education.

Braten (2009) compared religious education in England and Norway. In her thesis, she combined the levels of curriculum (the societal, institutional, instructional and experiential levels) with the idea of three dimensions (supranational, national and sub-national processes).

Braten (2009) argued that the similarities in religious education in England and Norway have been caused by international formal and informal trends.

It is difficult for a single researcher to conduct comparative research, because comparative study requires familiarity with at least two different contexts (Schweitzer, 2004). The REDCo project, carried out by scholars from eight countries, has been the biggest project in comparative religious education yet. The aim of the project was to compare religious education in eight countries to identify the potential and limitations of the subject. The project used different methodologies and lasted for three years. The researchers of the project believed in the importance of having study of religion for European countries (Weisse, 2011). The research included England, but excluded Turkey.

1.3. METHODOLOGY

As mentioned above, the number of the studies which compare religious education in England and Turkey is insufficient and those that exist lack satisfactory explanations for similarities and differences found.

It is argued that many, especially Western, countries have faced the same international trends. These trends can be divided into two groups: formal and informal (Braten, 2009). The formal trend is the tendency towards international policymaking. There are also legal requirements for non-discrimination against religion (Willaime, 2007) which can be regarded as a formal trend. The informal trends are globalisation, secularisation and plurality (Brown, et al., 1997; Willaime, 2007; Schreiner, 2007 and Braten, 2009). Religious education is not immune to the effect of these trends. According to Willaime (2007), secularisation and plurality resulted in certain developments in religious education of European countries. For instance, secularisation has taken religious education out of the hands of the church (religion) and given it to those of education. Hence, there is a trend from confessional to non-confessional religious education in Europe (Schreiner, 2007). Similarly, plurality has had an effect on religious education. Even countries in which there is confessional religious education have felt that they should take plurality into account. Although some countries still maintained their confessional teaching, they no longer stress on one faith due to these trends (Willaime, 2007).

However, it cannot be said that European countries all have the same form of religious education. Their religious education still differ in some respect due to contextual factors.

These factors are the type of nation state and secularism, the relationship between state and religion (church)[1], the control of religious bodies over schooling, legal systems, and the degree and nature of pluralism in society (Jackson, 2003a; 2009b; Schweitzer, 2006 and Schreiner, 2007). Hence, the responses of European countries to these international trends (formal and informal) are different.

In short, the dissertation argues that there are similarities between Turkish and English religious education due to the fact that they face the same international challenges/trends and that they are members of the same international organisations which make policies or recommendations on religious education. However, there are certain differences between English and Turkish religious education because England and Turkey have different contexts.

The issue of whether comparative studies can be used as a source of criticism of national processes is a controversial one. On the one hand, some believe that comparative studies cannot be used as a tool for critical analysis because the historical and political contexts of countries differ from each other and this makes critiquing nearly impossible (e.g. Schweitzer, 2006 and Braten, 2009). On the other hand, some use comparative studies to critique a national system. The work of Alberts (2007) is a good example here. Alberts compared English and Swedish religious education to critique German religious education.

The dissertation is going to attempt a compromise. It will be sensitive to contextual differences, but it will sometimes be critical of English and Turkish religious education, because as Sadler argued, when we study a foreign education system, we will definitely find at the end of our research that there are many good things which our country has and also there are many things which our country needs to change (Bereday, 1964). The dissertation believes that we can accelerate the process of change by critiquing national processes.

In the area of comparative religious education, terminology and language are the two biggest obstacles (Schweitzer, 2006 and Schreiner, 2007). A comparison of England and Turkey requires knowledge of two languages: English and Turkish. Terminology is another problem. For instance, comparative studies in religious education generally classify religious education of different countries by using certain terminologies like denominational, confessional, instructional, educational etc. However, what should be borne in mind is that the meaning of

[1] European researchers generally prefer to use church instead of religion, but the dissertation will use religion, because neither *church* nor *mosque* makes much sense in the Turkish context.

these words can differ from country to country. Schweitzer (2006) gives non-confessional religious education as an example. Schweitzer (2006) argues that Germany and England have non-confessional religious education, but the term 'non-confessional' have different meanings in England and Germany, so actually their religious education is different in terms of confessional teaching. In the studying Turkey and England, we have to keep in mind the possible different uses of religious education terminologies.

Comparative research should be seen as an umbrella term which consists of different methodologies (Schweitzer, 2004). The dissertation compares texts and documents. Specifically, the dissertation compares the laws of England and Turkey related to religious education and the curricula of religious education in the two countries. The bulk of the study is devoted to the contemporary, but in order to understand it better, the dissertation also looks at the history. Moreover, the dissertation seeks to tease out the partnership between state and religion.

International formal and informal trends will be mentioned here briefly.

1.3.1. SECULARISATION

Secularisation is a widely used term, but there is no consensus on its meaning[2]. It is generally used to express religious decline in society (Ziebertz, 2004). According to Bruce (2002), modern societies are secular. It is not accidental, because the changes which industrialization has brought such as technological consciousness, the decline of community and the rise of bureaucracy have made religion less relevant. This is the classical secularisation theory. However, there are some problematic issues here. Researchers in this field have tended to generalise their findings on Europe to the entire world, despite the fact that some parts of the world are more religious than ever (Berger, 1999). It cannot be argued that the world throughout is experiencing religious decay. Rather, we can argue that religion is changing its role in society (Berger, 1999).

More pertinent, England and Turkey both have a long tradition of secularism, but, as stated by Gates (2007), secularisation has different connotations in England and Turkey.

[2] For the different meanings of secularisation, see Shiner (1967).

In 1937 Turkey separated religion from state and become legally secular. Turkey borrowed the system of 'laïcité' from France. According to Miedema (2007), France applied two types of 'laïcité'[3]: a militant form and (especially after WWII) a management form. The former had a negative attitude towards religion, but the latter is more neutral to religion and is concerned with the creation of an environment in which people from different religious and non-religious background can live peacefully[4]. It can be argued that Turkey experienced both forms of secularism. Modern Turkey applied strict secular rules in the first quarter of the republic. Sufi lodges were closed, western-style dress was required by law, and pilgrimage to Mecca was banned (1934-1947). During that time, secularism 'came to be treated as a faith in its own right, and one which excluded other faiths' (Bilgin, 1993: 38). However, after WWII, the espoused secularism moderated its stance on religion and once again religion became an important player in both society and politics. Gates (2007) argues that secularism has a positive meaning in Turkey. Turkish secularisation means the separation of state and religion while admitting the importance of religion to Turkish society. Gates probably refers to the second type of secularism which Turkey experienced after WWII, because the first type of secularism definitely has a negative meaning.

In England, according to Gates (2007), secularism has a negative connotation. There it refers to the decay of institutional religion and how people are suspicious about all forms of religion. There was a sharp decrease in churchgoing from 57 percent in 1851 to 10 percent in the 2000s in England (Gates, 2005). Moreover, there is a general decrease in believing in God and an increase in atheism from 1945 to 1996 (Kay, 1997).

It can be argued that English and Turkish secularism differ from each other. This is important, because comparative studies should be aware of the fact that terminology can differ from country to country (see Schweitzer, 2006). Turkish secularism can be called a state secularism. There is a separation of state and religion, but there has never been a significant secular movement in society. 99 per cent of the population remain Muslim (Selçuk and Doğan, 2007). However, in England, there is no separation of state and religion. The Queen is still the head of both state and church. Although there has been a decrease in the church's hold over society (Copley, 2004), the established church still has representatives in the House of Lords. Regarding the society, according to 2001 census, 76 percent of the population

[3] The dissertation will use secularism instead of laïcité.
[4] This classification brings to mind two types of liberalism made by Wright (2007): comprehensive (hard) and political (soft) liberalism.

defined themselves as Christian while 15 percent as secular, and 6 percent as having religions other than Christianity. Therefore, English secularism can be defined as social secularism.

In the light of this, it can be claimed that Berger (1999) is right when he argued that secularism had not led to the disappearance of religion; it is obvious that religion is apparent in both countries and is still important to most of the people. Berger argued that religion has changed its role in society. As a result of secularism, in Turkey, the religiously-inspired state gave way to a secular state and in England, the power of church on society weakened and people who define themselves as atheist emerged.

In this section, the dissertation clearly showed how England and Turkey have been affected by secularism, an international informal trend. Throughout the chapters, the dissertation will point out the effect of secularism on English and Turkish religious education.

1.3.2. PLURALITY

The second international informal trend is plurality. Skeie (1995) put forward two types of plurality: traditional and modern/postmodern plurality. Traditional plurality refers to different groups (faiths or religions) within one society, while modern plurality reflects that in our time, individuals might choose their values and ideas from different sources. For instance, there are people who do not follow traditional religions and follow Humanism, or they sometimes synthesise different religions and non-religions. In short, individuals form their own beliefs by synthesising values and beliefs from a variety of sources (Skeie, 1995). These movements widen the gap between institutional and personal religion (Ziebertz, 2008).

Skeie (1995) argues that religious education should deal with modern/postmodern plurality, but the dissertation will focus on traditional plurality.

It is possible to divide traditional plurality into two groups: plurality within traditional societies (different denominations) and plurality within multi-faith societies (different religions). With regard to the former, England and Turkey have had plural societies. In England, there have been the established church, free churches and the Catholic Church. This was a Christian plurality (with, additionally, a small number of Jews). In Turkey, there have

been Sunni and Alevi[5] Muslims. The latter type of plurality, which derived largely from immigration, is a phenomenon of the twentieth and twenty-first centuries. Post-war immigration has made English society multi-faith, but Turkey has not experienced such immigration so there has never been a similar plurality.

Plurality is one of the most important challenges to religious education (Jackson, 2004). Religious education in Europe diverges or converges depending upon how each country conceives and responds to plurality (Ziebertz, 2008). English religious education should now deal with multi-faith and secular society, while Turkish religious education should address the expectations of Alevi community, which accounts for 25 percent of the population (Shankland, 2003).

The dissertation will show how plurality has affected English and Turkish religious education in the following chapters.

1.3.3. GLOBALISATION

Globalisation is both a formal and informal trend (Braten, 2009). Globalisation can be defined as 'the process through which local happenings are influenced by distant events which, in turn, are shaped by local events' (Jackson, 2004: 10). It is also closely related to international organisations. Globalisation has led to attempts by international organisations like the OSCE, the Council of Europe and the EU to govern countries. It has also accelerated social movement and increased interaction between nations. As a result of globalisation, international processes have started to influence national processes. For instance, as can be seen later, some European countries increased the stature of religious education due to the threat of communism (Bates, 1996 and Öcal, 2007). Similarly, after the 9/11 attacks, international organisations regarded religious education as an important school subject (Jackson, 2009a).

1.3.4. INTERNATIONAL ORGANISATIONS

There are many international organisations, but the dissertation will just mention organisations which are interested in religious education in Europe. These organisations are

[5] Although even the adherents of Alevi do not agree on how to define Alevi, it might be defined as 'a Sufi oriented, esoteric, and heterodox version of Islam' (Kaymakcan, 2010: 209).

the Council of Europe, the Organisation for Security and Co-operation in Europe (OSCE) and European Court of Human Rights (ECHR).

As mentioned above, globalisation is closely related to these organisations; it can be said that these organisations are caused by globalisation/Europeanization. Such organisations in the past generally omitted religious education when developing their policies on education. However, after 9/11, they included religious education (Jackson, 2009a).

The Council of Europe was established in 1949 and now has forty-seven member states, including Turkey and England. Before 9/11, the Council of Europe generally dealt with religious tolerance. For instance, Recommendation 1202 (Council of Europe, 1993) stressed that all principal religions in Europe can make a contribution to develop tolerance, which is one of the necessary elements of human culture. However, after 9/11, religious education became an important issue per se. In 2002, the Council of Europe decided to integrate the study of religion with intercultural education and established a working party whose aim was to suggest approaches and methods for the integration. The working party was based on the view that European countries encounter similar problems, that they can 'learn from each other' and that they ought to review their religious education policies through 'dialogue with the relevant stakeholders' (Jackson, 2009a: 87).

Recommendation 1720 (Council of Europe, 2005) and White Paper on Intercultural Dialogue (Council of Europe, 2008) also stressed the importance of having religious education in state schools.

It is worth noting that the reasons why religious education (study of religions) should be part of the curriculum and the aims given by the recommendations and projects of the Council of Europe are very different from traditional reasons and aims of religious education. The Council of Europe generally gives tolerance and respect as the aims and plural society and religion as a cultural fact, as the grounds for religious education in state schools (Jackson 2007 and Braten, 2009). These recommendations definitely have had an effect on participating countries, even though they are not legally binding[6].

The Organisation for Security and Co-operation in Europe (OSCE) has 56 members including Turkey and England. In 2007 the OSCE published the Toledo Guiding Principles. The reason

[6] Turkey takes these recommendations seriously. The 2005 Religious Education Curriculum states that international covenants necessitate religious education being a part of school curriculum (MEB, 2005).

why religious education is important is answered by the report being that 'it is important for young people growing up today to acquire a better understanding of the role that religion play in today's pluralistic world' (OSCE, 2007: 9). According to the report (2007), religious education in public schools should be learning about religion (non-confessional), but the state can offer learning religion (confessional) if families desire it. Sixteen principles are given in the report and the first two are about respect for human rights and religious freedom (OSCE, 2007).

Willaime (2007) argues that one of the reasons why religious education in Europe is converging is legal reasons. According to the European Convention of Human Rights, there should be no discrimination based on philosophical and religious grounds. This makes European religious education more open to other religions, and pushes religious education into a non-confessional approach. When this criterion (non-discrimination) is not met by the countries, European Court of Human Rights intervenes in national processes. For instance, when an Alevi family sued Turkey in 2007, the European Court of Human Rights decided that religious education in Turkey does not satisfy 'the criteria of objectivity and pluralism'[7].

These organisations mentioned above affects national processes and religious education is not immune to this effect. According to Jackson (2009a), these organisations do not seek to create a particular approach to religious education, but what they seek is to develop common values, like tolerance and respect and, to produce responsible citizens. Participating countries are expected to develop these values and achieve this objective, with these organizations setting a general guideline of common values.

Meanwhile, it is worth mentioning that when common values, objectives and standards are created by these organisations, comparative studies can inform them about national understanding of religious education. According to Schweitzer (2004), the standards for religious education to be set should not be based on one national situation, but on a comprehensive understanding of religious education and this understanding is best achieved through comparative studies.

[7] Zengin v. Turkey (ECHR, application no. 1448/04, 2007).

1.3.5. NATION-STATE

As argued above, there are contextual factors, such as the type of nation state and secularism, the relationship or partnership between state and religion, the control of religious bodies over schooling, legal systems, the degree and the nature of pluralism in society, which distinguish countries from each other in terms of religious education (Jackson, 2003a; 2009b; Schweitzer, 2006 and Schreiner, 2007).

According to Schiffauer, et al. (2004) from the 1870s, the development towards nation states commenced. The survival of nation states is dependent upon the creation of national imaginary to which citizens tie their identities. Education definitely plays an important role in creating this imaginary. The relationship between religion and state is the vital element of national imaginary as well. The responses of the countries to international trends (formal and informal) are conditioned by these imaginaries. For instance, the work of Schiffauer, et al. (2004) reveals that how England, Germany, France and the Netherlands produced different styles to integrate immigrants (pluralism, an international informal trend) and these styles reflect their national imaginaries.

The response of England and Turkey to plurality can be taken as an example which shows their contextual differences. England and Turkey have had plurality within their traditional communities. There were, and are now, different denominations of Christianity in England and of Islam in Turkey. England perceived plurality as a good thing (Schiffauer, et al., 2004). In religious education, England has taken this plurality into account, and the Cowper Temple Clause, which prevented religious education from being denominational in state schools, was introduced in 1870. However, Turkey has responded to this plurality in a different way. The presence of Alevi Muslims was ignored in religious education lessons until recent times[8], because after the demise of Ottoman Empire, Turkey had made radical changes, which can be regarded as a process of nation building. The citizens were accepted as Turks, and their religion was regarded as Sunni-Hanafi denomination of Islam (Kaymakcan, 2006). In doing so, Turkey ignored all differences within the Muslim denominations and community (Agai, 2011). Turkey has embraced unity rather than diversity/plurality. It is obvious that Turkey and

[8] It is important to note that Alevi community has never experienced the denial of political rights as happened in England to Catholics and the supporters of Free Churches who gained their political rights in 1829 and 1828 respectively (Gates, 2007).

England has different types of nation states, and imaginaries. In the light of this, it can be predicted that their religious education will be different.

1.4. LIMITATIONS AND SCOPE

The dissertation will investigate religious education in state schools in England and Turkey. In England, these are the community schools and in Turkey, 'devlet okulları' (state schools).

The dissertation will consist of five chapters. Introduction including Methodology accounted for the first chapter of the dissertation. The second chapter deals with the partnership between religion and state. The third chapter includes the laws of England and Turkey relating to religious education. Even though the history of these laws will be given, the focus will be on the current laws. Other religious activities and the conscience clause will be discussed in the third chapter as well. The fourth chapter concerns religious education curricula in England and Turkey. Here again the history will be given, but the dissertation will mainly investigate the current situation. Conclusion of the dissertation will be given in the fifth chapter.

The dissertation will be based on both primary and secondary sources.

1.5. MAIN RESEARCH QUESTIONS

The dissertation seeks to find the main similarities and differences in religious education in state schools in England and Turkey and account for them.

In particular, there are 3 sub-questions:

Is the partnership between state and religion similar or different in England and Turkey? How can the similarities and/or differences be explained? (Chapter 2)

What are the main similarities and differences in laws regarding religious education in England and Turkey? How can they be explained? (Chapter 3)

What similarities and differences exist in religious education curricula in England and Turkey? How can they be explained? (Chapter 4)

2. THE PARTNERSHIP BETWEEN STATE AND RELIGION IN ENGLAND AND TURKEY

State-funded schools are one of the essentials of nation states in order to turn children into citizens. A pupil in state schools 'acquires the mental representations and patterns of behaviour required to function as a member of a (civil) culture' (Schiffauer, et al., 2004: 2) and this process is called 'civil enculturation'. To establish schools apart from religious schools or institutions is peculiar to nation states. Until the emergence of nation states, almost all schools were controlled by religious institutions (Lauwerys, et al., 1979). Education had been seen as a private interest with the absence of state schools, but since modern states emerged, education has come to be seen as a state responsibility. Education is now regarded as an instrument that shapes and forms children as 'social individuals' (Hall, 1977: 7).

2.1. ENGLAND

Today, there are four different types of schools within the state system in England: voluntary aided, voluntary controlled, community and foundation schools. Schools have been classified in accordance with their religious tradition and origin in England (Cox, 1966). In addition to state schools, there is also a significant number of independent schools, which educate 7 percent of all students[9]. Some of the independent schools are also governed by religious foundations. Voluntary controlled, voluntary aided and foundation schools might have a religious character. Despite having a religious character, these schools are state-funded. This shows the strong cooperation between the state and religion, the roots of which can be traced to the middle of the nineteenth century. Prior to 1870, there had only been voluntary (mainly church) schools in England. The first state schools were established with the 1870 Act. When the state established its schools, it did not abolish church schools. The aim of the Forster Act (1870) was to fill the gaps. The community schools (board schools then) were established where there was no Church provision (Chadwick, 1997). The 1902 Act was regarded as a successful attempt to save church schools from dying out (Hurt, 1971). The act created a dual system. According to Gardned (2005) the 1944 Act strengthened the place of the religion (church) in education and brought church schools into the state system (Kay and Barnes, 1999). Now within the state system, both church schools — now called faith schools to be

[9] http://www.inca.org.uk/england-system-mainstream.html (04.06.2011).

more inclusive, in theory, of the other faith-based schools present — and community schools provide education to English pupils. The number of faith schools is almost 7,000 (there are approximately 20,000 schools within the state system in total). Though the overwhelming majority of faith schools are Christian (the Church of England schools accounts for 68 percent of all faith schools, and Catholic schools 30 per cent of all faith schools), there are also Jewish (38), Muslim (11) and Sikh (4) faith schools[10].

This history shows that English state has shared the responsibility of provision of education with religious foundations.

2.2. TURKEY

In the Ottoman Empire, schools were administrated by religious organisations (Erdem, 2005). The aim of schooling was to cultivate religious individuals (Koçer, 1987). At the beginning of the nineteenth century, secular schools (mekteb) was established and elementary education in the Ottoman Empire was made mandatory in 1824 (Erdem, 2005). So in the Ottoman Empire, there were two types of schools: madrasah and mekteb. Madrasah were the schools controlled by religious foundations, while mekteb were governed by the state, and they were called secular schools because their curricula included more secular lessons than religious lessons. After the Modern Turkish Republic was established in 1923, the Grand National Assembly of Turkey (Türkiye Büyük Millet Meclisi or TBMM in the original) decided to have a national character in education. The act of 'the unification of education' was introduced in 1924. The law is still under the guard of the 1982 Turkish constitution (section 174). 'Unification' meant that all state schools should be governed by the same organisation, the Ministry of National Education (Milli Eğitim Bakanlığı or MEB in original). Although the act did not mention the closure of madrasah, all of them, around 600, were closed in May 1924 at the command of the Minister of Education. The reason for closure given by the Minister of National Education was the nation's desire to produce individuals who have the same mindset (Ayhan, 2004). Pupils in religious schools might have a different mindset from their counterparts in secular schools. In some cases, this plurality of mindset is appreciated, but for modern Turkey, which sought to establish a community who has the same identity, nationality, religion, and mindset (Agai, 2011), this was undesirable. M. Kemal Atatürk (the Father of Turks) argued that

[10] http://www.education.gov.uk/schools/leadership/typesofschools/b0066996/faith-schools/maintained (08.08.2011).

schools of the nation should be the same and that all citizens, both men and women, should be trained there[11].

By virtue of the fourth article of the law on the unification of education, 'Imam-Hatip Okulları' (Imam and Preacher Schools or IPSs) were opened to develop religious functionaries. Although the initial aim of these schools was to produce religious clerics, over time these schools, as Bilgin (1993) argues, became general education institutions like ordinary Turkish schools (devlet okulları), because IPSs have been offering almost all lessons found in ordinary Turkish schools. Five percent of all secondary schools are IPSs in Turkey (Alakuş and Bahçekapılı, 2009). It should be borne in the mind that IPSs are funded and controlled by the Ministry of National Education. They do not have any connection with religious organisations. The current IPSs create clerics who are adherents of Sunni-Hanafi denomination, and there are no Alevi IPSs.

Although there are different types of schools and private schools in Turkey, the difference between these schools stems from their intake rather than their independence or their relationship with religious bodies.

Turkey established the Ministry of Religious Affairs in 1924. This state organisation is responsible for around 70,000 mosques in Turkey, 1,000 mosques outside Turkey and approximately 4,300 Quranic courses. It has around 100,000 employees (Agai, 2011). Nevertheless this organisation has never been allowed to intervene in schooling. Moreover, there is almost no cooperation between the state and the Ministry in preparing the materials and books for religious education lessons.

2.3. COMPARISON

Both countries had schools with religious character when they first handled the issue of education. England chose not to abolish religious schools. As a result, Christian churches and other religious organisations have continued to have a role in education. Turkey, however, abolished all schools with religious character in order to develop individuals with the same mindset (Ayhan, 2004). Turkish system did not fill the gaps. Rather, it widened the gap by abolishing the madrasah.

[11] The original of the statement is that 'Memleketimizin dâru'l-fünûnları bir olmalıdır. Bütün memleket evladı, kadın ver erkek aynı sûrette oradan çıkmalıdır' (Öcal, 2007: 514).

The English state has been open to cooperation with religious organisations in education, but Turkey believes this kind of cooperation is harmful to the secular state. Therefore, it might be argued that Turkish secularity has had a more direct effect on schooling than English secularity had, and this made all Turkish state schools secular. Although, in England the Non-conformists were especially against church schools (Kay and Barnes, 1999) and pressed for secular schools, the relationship between state and the established church prevented all state schools from being completely secular (Henson 1939 in Chadwick, 1997)

The existing cooperation between state and religion in England has created faith schools (voluntary aided and voluntary controlled). Voluntary aided schools can provide denominational and confessional religious education (Parker-Jenkins, et al., 2005). If one desires confessional and denominational religious education, one can choose a faith school. However, in Turkey, there are no such schools, so there is one form of religious education. Under the current system, all schools, even IPSs, have to use the national curriculum for religious education.

It is worth mentioning that state intervention in schooling in the Ottoman Empire happened 48 years earlier than in England. Primary school education was made mandatory in 1824 in Turkey and only in 1870 in England. However, in England now, there is 10 years compulsory education, while Turkey makes 8 years of education compulsory.

To sum up, the partnership between state and religion in Turkey and England is different. In England, there is a close partnership between state and religion (faith organisations), while in Turkey, there is no such partnership. The reason for this difference is the form secularism takes in each country. Turkish secularism has not allowed religion to take part in schooling, while, in England, despite secular movements in society as explained in the first chapter, the churches have always been an important player in schooling and retained its role in modern England. In addition, other faith groups, like the Muslims and Sikhs, have their schools integrated within the state system.

3. LAWS OF ENGLAND AND TURKEY REGARDING RELIGIOUS EDUCATION

In this chapter, the laws pertaining to religious education will be compared. There are four sub-headings: the history, the current situation, other religious activities and the conscience clause.

The main questions of this chapter are what are the main similarities and differences in laws regarding religious education of England and Turkey? How can they be explained?

3.1. THE HISTORY

Education had been mainly religious in the past although nobody called it that (Bilgin, 1993), and there was no divorce between secular and religious education (Hillard, 1963). Education started in sacred places like mosques and churches. Clergymen pioneered education in England (Aldrich, 1982). Until the nineteenth century, the Church schools in England and madrasah in the Ottoman Empire were the only places where pupils could be educated. Naturally, education in these places had a mainly religious character with secular subjects, such as literacy and numeracy, as additional subjects. However, the nation states tend to make education secular and religion limited to a subject, generally called religious education. In this part of the dissertation, the history of laws related to the 'subject' religious education in the state schools of England and Turkey will be discussed.

3.1.1. ENGLAND

The current situation of English religious education is determined by the 1988 Education Reform Act. Prior to this act, there were two important acts which affected English religious education: the 1870 and 1944.

The first English state schools were opened in 1870. According to Hillard (1963), the issue of whether religious education would be in the curriculum was not discussed during debates in the parliaments, but the debate was on whether the provision of religious education should be controlled by a central organisation or School Boards. W. E. Forster claimed that 'we want […] to do that which the majority of parents in this country really wish […] that there should

be a Christian training for their children - that they should be taught to read the Bible'[12] (Hansard, 1870, cc: 457-8), but he argued that this provision did not belong to the central government. As a result, the decision on the existence of religious education was left to School Boards (now Local Authorities or LAs). Religious education should be given at the beginning or end of the day. The Cowper-Temple clause was introduced. Plurality within Christianity led the politicians to enact this clause, which made English religious education non-denominational. The right to withdraw from religious instruction was given to families. Although the presence of religious education was dependent upon the decision of School Boards, according to Bent (1944), religious education was common in state schools (Bent, 1944 in Hillard, 1963). The name of the lesson was religious instruction.

The 1944 act opened a new era for religious education. Butler, the president of the Board of Education, stated that there was more or less religious education in schools but standards were 'uneven', and the government was planning to put religious education 'on a better basis'[13]. The 1944 Education Act made religious education compulsory (section 25). The name of the lesson was 'religious instruction'. One can ask the question of why the state made religious education compulsory in 1944. According to Hillard (1963), there were three reasons: historical, educational and utilitarian. Historically, Christianity has had a close relationship with the culture of the state and education. Religious education has educational grounds too, because the most important source of religious education was the Bible and it was important to English literature and history. Finally, there was the utilitarian need for moral education. Despite, their waning support for institutional religion, families feel that future generations need better moral education, based in Christianity (Hillard, 1963 and Kay and Barnes, 1999). The Christian faith was very important to the country because it was considered as a vital component of democracy that struggled against fascism and communism (Bates, 1996).

The 1944 Act reserved the Cowper-Temple Clause (section 26). It removed that religious education should be taught at the beginning or end of a day. The establishment of the Standing Advisory Council for Religious Education (SACRE) was left to the Local Education Authorities (LEAs), but many LEAs chose not to establish it. The act did not specify that religious instruction should be Christian, but it was clearly assumed that it would be, because

[12] Hansard for 1870 (vol.199) Available at: http://hansard.millbanksystems.com/commons/1870/feb/17/leave-firstreading#S3V0199P0_18700217_HOC_39 (accessed: 16.07.2011).
[13] Hansard for 1943 (vol.391) in Copley, 2008: 29-30.

at that time religion and Christianity were almost synonymous (Cox, 1966; Thompson, 2004; Meredith, 2006 and Copley, 2008). The Act made agreed syllabuses mandatory.

3.1.2. TURKEY

The current situation of religious education is dictated by the 1982 Constitution and subsequent laws. Prior to this date, there was no single act which deals with religious education. In Turkey, religious education was determined by constitutions and circulars.

In 1923, the education debate focused on whether education should have a national or religious character. Eventually, it was decided to be made national (Ayhan, 2004). The 1924 Turkish constitution did not refer to religious education, but stated that the religion of the nation is Islam (TBMM, 1924 s. 2). The first education Act of Turkey, called the unification of education, did not refer to religious education either, which meant that Turkish schools would have the same religious education lessons as the Ottoman secular schools (mekteb). The name of the lesson then was 'Kur'an Kerim ve Din Dersleri' (the Holy Qur'an and Religious Lessons). However, from 1924 Turkey introduced strict secular measures and eventually, secularism was introduced in 1937 as a principle in the constitution.

Firstly, religious education ceased in secondary schools (9th to 11th grade) in 1924, followed by the lower secondary schools in 1927 and primary schools in 1930 (Öcal, 2007). It is worth noting that these decisions did not derive from education acts, but the circulars. Within 7 years, all religious education was abolished. In a country where 99 percent Muslim population, there would be no religious education in state schools during the following 19 years.

From 1946 to 1949, religious education emerged as an important issue. The reasons for the emergence were increased social and economic relations with the western democracies, the change in Turkish political system from a single-party to multi-party system (Kaymakcan, 2010), increasing immorality in society and the fear of communism (Öcal, 2007).

As a consequence, in February 1949, the government sent a circular to all governorships. According to the circular, religious education would be available at the 4th and 5th grades of primary schools on a voluntary basis. Families who want their children to take religious education should give notice to school administrations at the beginning of the year. The

circular also stated that in a secular state, religious education cannot be taught as a mandatory subject (MEB, 1949: 153). With the circular, religious education returned to schools after 19 years.

Although religious education was optional in 1949, only one percent of pupils did not attend religious education. According to Parmaksızoğlu (1966), this one percent was pupils of families who were adherents of religions other than Islam. In 1950, the government issued a circular which stated that families who did not want their children to take religious education should give a letter to opt out instead. In 1956, religious education was introduced in the 6th and 7th grades (Ayhan, 2004).

The 1961 Constitution addressed the issues regarding religious education for the first time. Article 19, under the title of 'Freedom of conscience and religion', stressed that religious education should be given under the control and supervision of the state and religious education and instruction should be voluntary subject[14] (TBMM, 1961, s. 19). This shows that the state did not want any rival for religious education. The constitution used both instruction (öğretim) and education (eğitim) in order to refer to the lesson which was called 'Din Bilgisi' (religious knowledge).

Religious education was introduced at for the 9th and 10th grades in 1967 and the 8th and 11th grades in 1976 (Ayhan, 2004).

1974 was an important date for Turkish religious education, because compulsory 'moral education' was introduced into the curricula of primary and secondary schools from 4th to 10th grades (Ayhan, 2004; Kaymakcan, 2006 and Çelik, 2008). This was important because it shows that in a secular country, moral education as a subject can be made compulsory, and this opened the way for compulsory religious education. Moral education was based on Islam, so it was a form of religious education, even though it could not be named such due to article 19 of the 1961 constitution. Additionally, there was no right to withdraw from moral education.

[14] The original quote is 'Din Eğitimi ve Öğretimi devletin denetimi ve gözetimi altında yapılır. Din eğitimi ve öğretimi, ancak kişilerin kendi isteğine; küçüklerin de kanuni temsilcilerinin isteğine bağlıdır' (TBMM, 1961, s. 19).

3.1.3. COMPARISON

Turkish religious education has been governed by constitutions and circulars, while English religious education has been controlled by education acts[15]. English laws concerning religious education changed twice in 1870 and 1944, but Turkish religious education experienced many changes. This is probably due to the lack of education acts in Turkey. Turkish religious education was determined by circulars, which do not need approval from the parliament. This made Turkish religious education easy to change and that is why it changed many times. Finally the 1982 Constitution solved this problem.

The 1870 and 1944 Acts of England were the products of compromises. This made religious education difficult to change. For instance, according to Copley (2008), in the nineteen seventies, it was understood that the 1944 act did not work very well in terms of religious education and, therefore, there was a need for a new act, but politicians did not have any enthusiasm to change it, because of the difficulty of arriving at a compromise.

Religious education has always been available in state schools in England. From 1870 to 1944, the provision of religious education was left to School Boards, and while some School Boards chose not to provide religious education, the majority did. The 1944 Education Act in England made religious education compulsory, so every child had a right to take religious education. In contrast, Turkey experienced the absence of religious education. From 1930 to 1949, there was no religious education in state schools at all. The reason for the difference might be that there have been strong relations between church and state in England (see the chapter 2.1.) and the Church of England, especially, has been an important stakeholder in the acts (Hurt, 1971 and Copley, 2008), while in Turkey, religion was regarded as a barrier to the modern state in the early republican period (Agai, 2011) (see the chapter 1.3.1.) and the Ministry of Religious Affairs has never had a voice in circulars or constitutions. This difference between England and Turkey derives from their different relationships with religion, which is one of the contextual factors.

English laws concerning religious education were affected by plurality. The Cowper-Temple Clause and Conscience Clause were the results of plurality within Christianity. Moreover, due to this plurality and church rivalry, the government had to leave religious education to school

[15] Even though there are circulars in England too, they generally explain the acts or make recommendations.

boards. In 1944, church rivalry weakened because of the war, and religious education was introduced as a mandatory subject.

In Turkey, secularism was influential. It caused the abolition of religious education. Although in England secularism has never caused a total absence of religious education, it changed the aims and content of religious education (see the chapter 4).

Globalisation had an influence on both England and Turkey. In the forties, both countries experienced the threat of Communism, which was against religion. As a result, the importance of religion and ethics increased in both countries (Bates, 1996 and Öcal, 2007) as a reaction against Communism. Hence in the forties, both countries made important changes in religious education. England made religious education mandatory, and Turkey introduced religious education as a voluntary subject. These changes can be accounted for the effect of international processes and trends on national processes.

In conclusion, in the history of laws concerning religious education, there are differences and similarities. The main similarity is that both countries made vital changes in their religious education in the forties due to global threats (globalisation). The main difference between Turkey and England was that there has never been an absence of religious education in England, but there was an absence of it for 19 years in Turkey. The reason for the difference was the different relations between state and religion in Turkey and England. Another difference is that Turkish laws pertaining to religious education was generally affected by secularism and English laws pluralism.

3.2. THE CURRENT SITUATION

3.2.1. ENGLAND

The current situation of religious education in England is determined by the 1988 Education Reform Act enacted under the Conservative government. The aim of the act was to centralise the curriculum, and create Grant-Maintained schools free from Local Education Authorities (LEAs) (now Local Authorities or LAs). The original draft of the 1988 Education Reform Act did not include any important change that reforms religious education. Nevertheless, in the House of Lords, the matter triggered intense debate. At the heart of the debate was whether the content of religious education should be a multi-faith or Christian (Alves, 1991). Several

amendments which stressed Christian dominance were proposed. These amendments were not accepted but a need for an amendment which compromises between those who support the centrality of Christianity in religious education and those who are in favour of multi-faith education emerged. Eventually Dr. Graham Leonard, the then-Bishop of London, introduced amendments to the Bill which were supported by the Government and enacted (Meredith, 2006 and Copley, 2008).

Some elements of the 1944 Education Act were confirmed by the 1988 Education Reform Act. All state schools have to offer religious education to all pupils (UK Government, 1988, 2:1). In all key stages (from 1 to 4), religious education was compulsory. Religious education in community schools should be non-denominational. This was a remnant of the 1870 Act. Francis Cowper-Temple introduced a clause which made religious education free from any distinct catechism. The conscience clause gave parents have the right to withdraw their children from religious education. This made religious education only both compulsory and optional subject. Every LEA should arrange an agreed syllabus conference that prepares a Locally Agreed Syllabus (LAS). There should be consensus among the four committees about the content of religious education. Teachers also have the right to refuse to give religious education.

The 1988 Act also included new things. According to the Act, the syllabuses of state schools 'shall reflect the fact that the religious traditions of Great Britain are in the main Christian whilst taking account of the teaching and practices of the other principal religions represented in Great Britain' (8:3). For the first time in England, the content of agreed syllabuses should comply with a legal prescription. However, voluntary-aided schools may use their curriculum for religious education, and, in theory, they can provide denominational and confessional religious instruction (Jackson, 2003c and Parker-Jenkins, et al., 2005).

Until the 1988 Education Reform Act, as we have seen, no particular religion had been mentioned in English law. The 1988 Education Reform Act mentioned Christianity and made it clear that Christianity has priority over other religions. However, the Act did not specify the 'other principal religions represented in Great Britain'. These religions were later interpreted to be Islam, Judaism, Hinduism, Buddhism and Sikhism (see the chapter 4).

The act also necessities every LEAs to have a SACRE whose duties are to advise the LEAs concerning religious education and to review locally agreed syllabuses at least every five

years (DfE, 1994, s. 34). There are over a hundred SACREs in England and Wales (Barnes, 2008b). The SACREs and agreed syllabus conferences were similar. In the Agreed Syllabus Conferences, there are four committees: (1) the representatives of Christian and other religious denominations, (2) the representatives of the Church of England[16], (3) teachers and (4) local authorities. In the 1944 Act, the first committee consisted of other Christian denominations, but contrary to the 1944 Education Act, since 1970 other religious groups have been included in the first committee (Hull, 1989a), and the 1988 Act reified it.

The law also changed the definition of the term 'religious education'. In the 1944 Act it encompassed both religious instruction and collective worship. The term 'religious education' was applied to the study of religion as a subject in the 1988 Act. The change of the meaning of the name shows that the subject is not seen as instruction (Hull, 1989a; Jackson, 1990 and Jackson and O'Grady, 2007).

3.2.2. TURKEY

On 12 September 1980, the Turkish Military seized the power because of the violence in the country. The aim was to bring order to the country. Thus, the first objective was to enact a new constitution. In Turkey, school lessons are generally dictated by circulars, not by constitutions. The 1961 Constitution was innovative in that it addressed religious education, but it only stressed that religious education should be under the control of state and that religious education should be a voluntary subject (TBMM, 1961, s. 19). After the coup, the Military Government established an advisory council to produce a constitution. The initial draft of the constitution preserved the 1961 article concerning religious education (Ayhan, 2004). However, there was intense debate amongst the advisory council as to whether there should be compulsory religious education in state schools. Alevi members of the council did not want religious education to be put in the curriculum, because they claim that religious education would be based on Sunni-Hanafi school (Ayhan, 2004). Eventually, the advocates of compulsory religious education won the debate. The advocates put forward many arguments in favour of mandatory religious education. First of all, they argue, if the state does not provide religious education, citizens will definitely find other places to obtain it, and these places might teach a brand of Islam deemed harmful to impressionable children (Ayhan, 2004). This was clearly an attempt to prevent radical Islam from thriving (Willaime, 2007).

[16] This shows that the established church has a voice in the process of syllabus making even in the areas where there are no adherents of Anglican Church.

Secondly, Ataturk's stance that religious education was the province of the state[17] was widely used in support of mandatory religious education.

What should be borne in mind is that no other school subject is mentioned in the 1982 Turkish constitution or any other Turkish constitutions. This reflects the importance of religious education for both the state and society.

Section 24 of the 1982 Constitution states that 'Education and instruction in religion and ethics shall be conducted under state supervision and control, instruction in religious culture and moral education shall be compulsory in the curricula of primary and secondary schools. Other religious education and instruction shall be subject to the individual's own desire, and in the case of minors, at the request of their legal representatives'[18][19]. This article is under the title of 'Fundamental Rights and Duties', highlighting how religious education is seen to be both a duty and a right. The law made religious education compulsory in primary and secondary schools. Although, according to the law, religious education should be compulsory at every stage of primary and secondary education, the implementation has been different. There has been religious education lesson from fourth grade to twelfth grades. In the first four grades, there has been no religious education.

Moreover, the second half of the law which states that 'other religious education and instruction shall be subject to the individual's own desire, and in the case of minors, to the request of their legal representatives' implies that if families want more religious education for their children, schools should provide it, but there has never been such provision (Ayhan, 2004 and Öcal, 2007).

The name of the lesson is 'religious culture and ethics knowledge'. The name suggests that the aim is to teach about religion, or rather, religions, in order to establish a religious culture. The name also suggests that more than one religion is to be taught (Kaymakcan, 2007). Moral education is also stressed in the law.

[17] The original text is 'Her fert dinini diyanetini, imanını öğrenmek için bir yere muhtaçtır, orası da mekteptir' (Ayhan, 2004: 287).
[18] The original text is '... din ve ahlâk eğitim ve öğretimi Devletin gözetim ve denetimi altında yapılır. Din Kültürü ve Ahlâk öğretimi ilk ve ortaöğretim kurumlarında okutulan zorunlu dersler arasında yer alır. Bunun dışındaki din eğitimi ve öğretimi ancak kişilerin kendi isteğine, küçüklerin de kanuni temsilcisinin talebine bağlıdır...' (TBMM, 1982, s. 24).
[19] English translation of the law was taken from OECD, 2007: 13-4.

The Basic Law of National Education also addressed religious education. This law did not prescribe too much detail to religious education. According to section 12 of this law, Turkish national education should be based on secularism and religious education should be taught in primary and secondary schools[20] (MEB, 1983). It is significant that secularism and religious education was mentioned in the same section. This clearly shows that the aim of religious education is not evangelization (Bilgin, 2004).

The preparation of curriculum and books are given to 'the General Directorate of Religious Instruction', which works under the Ministry of National Education by the law on Organization and Functions of the Ministry of National Education (MEB, 1992, s. 17). All state schools should use these books and curricula.

3.2.3. COMPARISON

In both countries, religious education is a separate school subject, and has its own curriculum.

Religious education is determined by laws in both countries. In Turkey, the Constitution and the Basic Law of National Education oblige state schools to provide religious education, while in England religious education is required to be taught in schools by the 1988 Education Reform Act.

When the acts were enacted, 85 percent of English population was Christian (Copley, 2008), while 99 percent of Turkish population was Muslim (Ayhan, 2004). These numbers are important, because despite 85 percent being Christian, the English law mentioned Christianity and clearly gave priority it over other religions. The emphasis on Christianity should be understood in the context of the strong relationship between the established church and state (Schiffauer, et al., 2004). In contrast, Turkish law did not mention Islam specifically, but it was assumed that religious education would be based on Islam. This was the assumption in the 1944 Education Act in England too, with respect to Christianity in this case. However, it is worth mentioning that the reason for the omission of Christianity in the 1944 Act was that religion was almost synonymous with Christianity in England then (see Cox, 1966;

[20] The original text is 'Türk millî eğitiminde lâiklik esastır. Din Kültürü ve Ahlâk öğretimi ilkokul ve ortaokullar ile lise ve dengi okullarda okutulan zorunlu dersler arasında yer alır…' (MEB, 1983: 12).

Thompson, 2004; Meredith, 2006 and Copley, 2008), while in Turkey, the reason for the omission was partly the strong separation between religion and state.

It is interesting to note that initially England and Turkey did not plan to change the laws regarding religious education in 1982 and 1988 respectively. This indicates that the change in religious education which grounds the current situation in both countries, was unplanned.

Both countries' laws on religious education are, to a certain extent, abstruse. For instance, after the 1988 Education Reform Act especially, how to understand the clause 'the religious traditions of Great Britain are in the main Christian whilst taking account of the teaching and practices of the other principal religions' triggered an intense debate as to whether the law necessitates instruction, or how many hours should be spent on Christianity (see Hull, 1989: 13-4; Thompson, 2004: 115-6 and Jackson and O'Grady, 2007). The politicians and professionals expected that circulars would make the law more understandable, but the circulars were as difficult to understand (Copley, 2008). Likewise, the second half of the section 24 of the Turkish constitution on religious education has been neither applied nor understood (Ayhan, 2004). This is probably due to the fact that religious education is a very sensitive and contested issue in both countries, so politicians feel that it is better to leave the laws abstruse in order to reach consensus.

It is argued in the chapter 3.1 that Turkish religious education was more fragile than the English, because until 1982 Constitution, religious education had been dictated by circulars which are easy to enact. However, the current situation shows that Turkish religious education has, in theory, a stronger place than English religious education, because it is now determined by the constitution, which is very difficult to change.

In terms of details, English law concerning religious education is more detailed than Turkish law. Turkish law just mentions that religious education is compulsory, it should take secularism into account and the General Directorate of Religious Instruction is responsible for books and curricula, while English Law mentions religious education is compulsory, it should take Christianity and other principal religions represented in Great Britain into account, a commission should be set up in order to prepare locally agreed syllabuses, there should be four committees in the conferences, teachers have a right to decline to give religious education, families have the right to withdraw their children, religious education should be non-denominational (the Cowper-Temple Clause), and the SACREs should be set up.

A significant difference between Turkish and English religious education in terms of law is the the role given to local administrations. In Turkey, religious education is strictly controlled by the Ministry of National Education, while in England, LAs have a right to produce syllabuses reflecting the local ethnic and religious context, and, interestingly, religious education is the only subject determined by local administrations in England. This difference is due to the strong centralisation in Turkey and the tradition of decentralisation in England. It was showed in the methodology that some researchers used comparative religious education as a way of critiquing of national processes (e.g. Alberts, 2007). The view of the dissertation on this issue is that it is better to leave the preparation of religious education syllabuses to local authorities, because religious education is a very sensitive issue and in the big countries like England and Turkey, there are regional variations in plurality. By doing so, we would allow local variation (Kay, 1997), and different actors to take part in religious education[21], and this definitely would lead to reform and innovation (Barnes, 2008b), as can be seen in the nineteen seventies in England. Due to the decentralised religious education in England, religious education has had a bottom-up character. For instance, in the seventies, some locally agreed syllabuses embraced a multi-faith and non-confessional religious education, even though there was no change in the legislation. Similarly, local syllabus conferences included other faith groups, contrary to the 1944 Act. Finally, the 1988 Education Reform Act reified multi-faith and non-confessional religious education and allowed other faith groups to participate in the preparation of locally agreed syllabuses.

A further difference is that English laws prescribe the content of religious education to a certain extent, but Turkish laws do not say anything about the content. It can be claimed that it is better to leave the decision about the content of religious education to professionals. Otherwise, this makes religious education a highly politicised subject.

A vital difference between English and Turkish laws is the use of terminology. In the methodology of the dissertation, it is argued that terminology is one of the obstacles to comparative studies. In England, the change of the name from ‘instruction’ to ‘education’ means that there is no longer confessional religious education in community schools (Hull, 1989a and Jackson, 1990). However, in Turkey there remains no clear distinction between

[21] In England, studies on religious education have been generally funded by higher education or private institutions (Francis, 2004 and Copley, 2008). This is probably by virtue of the decentralisation of religious education; as a result, different actors have taken part in religious education.

education (eğitim) and instruction (öğretim)[22]. These words are used together in the constitution (see above) in reference to the lesson 'religious culture and ethics knowledge'. This usage does not mean that religious education can include both confessional and non-confessional elements. Rather Turkish religious education should be non-confessional, due to secularism. In short, the terminology in Turkey and England sometimes does not match.

Another terminological difference is the use of the term 'compulsory'. English religious education has been characterised as compulsory since 1944, while Turkish religious education since 1982. The 1944 Act stated that all school children were entitled to religious education, with the right to withdraw. This made English religious education compulsory. However, in Turkey in order to call a lesson 'compulsory' (zorunlu) there should not be a right to withdraw. For instance, in 1950 the circular stated that families who did not want their children to take religious education should give notice. With this change, religious education became a compulsory subject with the right to withdraw, but at that time nobody characterised Turkish religious education as a compulsory subject. In fact, the 1961 Constitution stated that religious education was not compulsory. Only when the 1982 Constitution made religious education compulsory and removed the right to withdraw, did the lesson become 'compulsory' in the Turkish sense.

Secularism was influential to both laws. Turkish law explicitly mentioned secularism; therefore, religious education is required to take account of it. In doing so, religious education was accepted as an educational subject, rather than a religious subject. Although English law did not mention secularism, the change of the name of the lesson might be regarded as an effect of secularism. It can be seen that English and Turkish religious education converged due to secularism. This international trend resulted in the introduction of non-confessional religious education in England and Turkey (see also Willaime, 2007).

Although the determining factor in the formation of laws is the state, as Ball (2006) argues policy texts are 'the product of compromises at various stages' especially 'in the parliamentary process' and 'they are typically the cannibalised products of multiple influences and agendas' (Ball, 2006: 44-5). The dissertation will not go into detail of all stakeholders who influence these policy texts, but it will just mention the effect of institutional religion (the Established Church in England and the Presidency of Religious Affairs in Turkey) on these

[22] According to Yeaxlee (1931), in the twenties, some used the term 'instruction', while meaning 'education' (Yeaxlee, 1931 in Hull, 1989), so even in England the distinction between these words sometimes blurs.

laws. In England, the church has been influential in religious education. Anglican bishops in the House of Lords enable the church to have a direct political influence on the laws pertaining to religious education (Copley, 2008). Moreover, the Church of England forms the committee B of the agreed syllabus conferences. This also allows the church to intervene in the content of religious education. However, in Turkey, neither the Presidency of Religious Affairs nor other faith groups have been allowed to influence the laws regarding religious education.

In conclusion, the current laws regarding religious education of England and Turkey were investigated in this section. The main similarities are that religious education is a separate school subject and has its own curricula; it is determined by the laws even though the laws are to some extent abstruse owing to the sensitiveness of the issue; there is non-confessional religious education, due to secularism. However, the main differences are that Christianity is mentioned by English law, but Turkish law does not mention Islam due to secularism; English law is more detailed than Turkish law; English law gives local administrations a role in religious education due to the tradition of decentralisation, but Turkey centralises religious education. Two terminological differences were identified: the usage of 'compulsory' and the usages of 'instruction' and 'education'.

3.3. OTHER RELIGIOUS ACTIVITIES

Here, other religious (or secular) activities in state schools will be discussed.

3.3.1. ENGLAND

In England, there is a daily act of collective worship (UK Parliament, 1988, s. 6.1) which is regarded as a religious activity. According to the law, all state schools should hold a daily act of collective worship. This worship should be 'wholly or mainly of a broadly Christian character' (section 7.1). In community schools, collective worship should not be denominational, but schools with religious character (voluntary aided, voluntary controlled and foundation) can hold a denominational collective worship (Jackson, 2003 and Parker-Jenkins, et al., 2005). Although every state school is required to offer collective worship every day, in practice some schools do not offer it (Burn and Hart, 1988 and Gates, 2007).

3.3.2. TURKEY

In Turkey there is no other religious activity except religious education. However, there is a school pledge which might be considered as a national-secular activity. It is called as 'Our Promise' ('Andımız' in original). It should be held every morning in primary schools (from 1st to 8th grades). In 1933, Reşit Galim, the then-Minister of National Education, wrote it and since then it has been said by students every morning. It goes like this:[23]

'I'm Turkish

I'm righteous

I'm hard working

My principle,

Is to protect my minors

Is to respect my elders

Is to love my country and my nation much more than my own self

My law,

Is to rise, is to go forward.

O' supreme Ataturk,

I swear that I will walk non-stop

On the path you opened, on the target you pointed out

[23] The original text is that
'Türküm
doğruyum
çalışkanım
İlkem,
küçüklerimi korumak
büyüklerimi saymak
yurdumu, milletimi özümden çok sevmektir.
Ülküm,
yükselmek, ileri gitmektir.
Ey Büyük Atatürk!
Açtığın yolda, gösterdiğin hedefe durmadan yürüyeceğime ant içerim.
Varlığım Türk varlığına armağan olsun.
Ne mutlu Türküm diyene!'

On the ideal you founded

Let my existence be bestowed upon the Turkish existence

Happy is the one who calls himself a Turk'[24]

3.3.3. COMPARISON

The fundamental difference between Turkey and England can again be witnessed here. In England, despite the presence of multi-faith and secular society, the school preamble (although collective worship does not have to be held in the mornings) should be 'wholly or mainly of a broadly Christian character', while in Turkey, in spite of the overwhelming majority being Muslim, there is a secular-national preamble which takes, instead of any religious character, Ataturk as a mentor, and assumes that the purpose of life is to live for your country rather than for your religion.

3.4. CONSCIENCE CLAUSE

In this last part of the chapter 3, the dissertation is going to discuss the right to withdraw from religious education in England and Turkey.

3.4.1. ENGLAND

The Education Reform Act 1988 section 9.3 gives families the right to withdraw their children from religious education, either partially or wholly. This right has a long tradition in England. It was used for the first time in an Anglican school, which served not only Anglican children but also children of families who were adherent of Free Churches (Copley, 2008). The Education Act in 1870 gave this right to parents for religious education. The users of the right have changed over time. In the beginning, Nonconformist families used this right, later Catholics, followed by Jehovah's Witnesses, and finally Muslims. Nevertheless, its usage has never been universal (Meredith, 2006; Hull, 1998 and Copley, 2008). The right to opt out includes collective worship as well.

[24] English translation of 'Andımız' was taken from http://www.forumizyon.com/showthread.php?1085-The-Turkish-Oath-(And%26%23305%3Bm%26%23305%3Bz-%26%23304%3Bngilizcesi) (accessed 01.08.2011).

3.4.2. TURKEY

There was a right to opt out in Turkey between 1949 and 1982. When religious education became mandatory in 1982, this right was abolished. Although in 1990 a limited right was given to non-Muslim families (Kaymakcan, 2007), there is still no universal right to withdraw from religious education. All Muslim pupils have to attend religious education by virtue of the constitution. According to the constitution, religious education is both a duty and a right. However, this has resulted in many disputes, especially by Alevi families which have made many attempts to seek recourse from the law. Finally, in 2006, a local court decided that the applicant, an Alevi student, did not have to take the lesson (Kaymakcan, 2007). Turkey was sued by an Alevi family in 2007 in the European Court of Human Rights[25]. Furthermore, in 2008 the Council of the State requested a change in the content of religious education and argued that compulsory religious education cannot continue to exist with this content (Kaymakcan, 2009). In spite of these convictions, no significant change in the content of religious education has been made yet. The 2005 curriculum for secondary schools and the 2006 curriculum for primary schools are still in use with only minor changes. Turkey is planning to solve the problem by giving the right to withdraw from religious education to all families in a new constitution[26].

There is no right to withdraw from the school preamble too.

3.4.3. COMPARISON

There is a conscience clause in England but not in Turkey, so it can be said that religious education is an obligation and a right in Turkey, while just a right in England. In terms of human rights, it is best to introduce a right to opt out as many countries do, due to human right legislations (Schweitzer, 2005). Toledo Guiding Principles argues that the right to opt out can prevent religious discrimination (OSCE, 2007).

According to Meredith (2006) in England, due to the right to withdraw, families cannot pose a challenge to the governments under the Article 2 of the First Protocol to the European Convention on Human Rights, but in Turkey, this is the case. Both at the local and international level, there have been juridical conflicts over religious education in Turkey.

[25] Zengin v. Turkey (ECHR, application no. 1448/04, 2007).
[26] In Turkey the 1982 Constitution is still being used, but there are preparations for a new constitution (see http://bianet.org/bianet/siyaset/101850-turkiyede-din-egitiminin-anayasal-macerasi) (accessed 09.08.2011).

In this respect, the English system is better than the Turkish system. However, the English right to withdraw is not immune to criticism. According to Schweitzer (2004 and 2005), religious education should be based on the right of children to religious education, so children should be given the choice to attend religious education[27], but in England families have the right to withdraw. There is an assumption that the interests of families and those of children (older children too) overlap, but, as is known, it is not always the case[28]. It can be claimed that if children are asked whether they want to be withdrawn from religious education, there can be a better result, and this also suits the UN Convention on the Rights of the Child whose article 12 states that the views of children should take into account, when the decisions which affect their lives are taken[29]. In fact, in England the 2002 Education Act took steps to apply the UN Convention on the Rights of the Child. It stated that there is a need for consultation with pupils when school governing bodies and LEAs make decisions which affect children (in Meredith, 2006). However, according to Meredith (2006), this innovation has not been applied to parental right to withdraw from religious education, because this right does not leave any place for such consultation.

In Turkey, there is general opposition to the right to withdraw, since it is believed that such a right would cause conflict and discrimination among families (Ayhan, 2004 and Kaymakcan, 2009) and that if the content of religious education is changed and adapted to the wishes of all families, there would be no need such a right. To an extent, these views have some validity. The families who exercise the right may face discrimination. This is the case in England as well. For instance, Copley argued that some parents wanted to withdraw their children, but they were afraid of discrimination (Copley, 2008 and see also Chadwick, 1997).

It can be argued that on the one hand there is no need for a conscience clause, because in both countries religious education is regarded as a non-denominational[30] (see the next chapter) and non-confessional (see above) subject. Religious education has educational, rather than theological, grounds. These characteristics make religious education an ordinary school subject, therefore, if there is no right to withdraw from history, English or Turkish lessons, there should not be one for religious education too. The preservation of the conscience clause

[27] For instance in Germany, religious education is voluntary and regarding conscience clause, for children at a young age, the decision is given to parents and from the age of 14, the decision is taken by children themselves (Nipkow, 2004).
[28] The same problem can be seen in the debate on faith schools in England see, for instance, Marples (2005).
[29] http://www.unicef.org/crc/files/Rights_overview.pdf (17.08.2011).
[30] The countries which have a conscience clause generally have denominational religious education, for instance, Germany and Italy (Schreiner, 2001).

means that we still accept that there is a confessional and denominational elements in religious education[31]. On the other hand, in terms of human rights, religion is different from history or literature, so in order to avoid juridical conflicts, a conscience clause can be introduced. As was stated above, in a near future Turkey will introduce a conscience clause, and the reason is to avoid juridical conflicts.

In conclusion, the conscience clause in England and Turkey was discussed here. There is an obvious difference between England and Turkey, that is, England has a universal right to withdraw from both religious education and collective worship while in Turkey, there is a limited right for non-Muslim families from religious education and there is no right to withdraw from the school preamble. The similarity is that both countries give the right to families rather than children, which the dissertation found problematic. The reason for the presence of conscience clause in both countries (although Turkey will have a universal right to withdraw from religious education in the near future) is the international organisations. This is an international formal trend (see Willaime, 2007 and Braten, 2009) that influenced religious education in both countries. The recommendations of OSCE (2007), the verdicts of European Court of Human Rights and human right legislations have forced European Countries to introduce a conscience clause (Willaime, 2007). The current situation highlights how religious education is a right in England, but a right and duty in Turkey.

[31] The eminent scholars were against the conscience clause. For instance, Smart argued that 'It must be bad education if there is a conscience clause. It must presume bias and unfairness' (Smart, 1970: 13). In a similar vein, Hull argues that 'there should be no right of withdrawal from this vital aspect of the general education of all school students' (Hull, 1989b: 9). In Turkey, Kaymakcan (2009) and Ayhan (2004) opposed the conscience clause.

4. RELIGIOUS EDUCATION CURRICULA IN ENGLAND AND TURKEY

In this chapter, the dissertation will tease out the religious education curricula in England and Turkey. There will be two sub-headings: the History and the Current Situation.

The main questions of the chapter are what similarities and differences exist in the religious education curricula of Turkey and England? How can they be explained?

4.1. THE HISTORY

Religious education curricula has changed many times in both countries, it is obvious that for the dissertation limited to 20,000 words, it is difficult to mention and compare every change made in religious education curricula.

Additionally, what should be borne in mind is that religious education curricula in England and Turkey have been conditioned by different authorities (see the laws). In Turkey, there has been a national body responsible for the preparation of curricula, so there has been a single voice, while in England, the curricula have been prepared locally by agreed syllabus conferences and therefore there have been many voices.

Luckily, despite this difference, some common trends can be observed in religious education curricula in both countries. Thus, the dissertation will investigate the history of curricula in terms of these trends: whether religious education was denominational or non-denominational, whether confessional or non-confessional, whether child-centred or content-centred, and whether multi-faith or single faith.

4.1.1. ENGLAND

The Cowper-Temple Clause, introduced in 1870 due to Christian plurality in society, prevented religious education from being denominational in the first place. As a result, religious education (called religious instruction then) had been reduced to Bible teaching (Chadwick, 1997). The controversy at that time was whether the Bible should be taught with comment or without comment, because families, especially the nonconformists, feared denominational proselytizing (Hull, 1989 and Thompson, 2004). Despite a non-

denominational religious education, the content of religious education has generally come from Protestant sources (Chadwick, 1997 and Copley, 2008)[32].

Regarding confessional teaching, in the past, the aim of English religious education was to foster Christian faith. Multi-faith society and secularisation were the reasons for a non-confessional teaching in England. However, according to Jackson (1992), Copley (2008) and Hull (1989), the dissatisfaction with confessional teaching was voiced as early as in the nineteen twenties when there was no apparent diversity in the society. WWII prevented these voices from having any effect on religious education during which time, Christian faith and values had gained a huge importance (Copley, 2008). The 1970 Durham Report commissioned by the Church of England argued that it was not responsibility of teachers in state school to nurture Christian faith (in Bates, 1996 and Copley, 2008). Similarly, the Working Paper 36 was against confessional teaching because the society was secular and multi-faith (Schools Council, 1971). In 1975, the first syllabus which abandoned Christian nurture came to existence: the 1975 Birmingham Agreed syllabus (Barnes, 2008b). Since then, most of the local syllabuses have abandoned confessional teaching. In doing so, religious education, in practice, shifted from religious instruction towards religious education without any change in the law (Meredith, 2006). Finally, confessional teaching was officially removed from religious education in state schools by the 1988 Education Reform Act (Hull, 1989).

With regards to multi-faith religious education, until the nineteen seventies, there was single-faith religious education. The 1971 Working Paper 36 backed multi-faith religious education, due to religious plurality in society (Schools Council, 1971). The pioneer syllabus was again the 1975 Birmingham Agreed syllabus which embraced multi-faith approach to religious education. Unsurprising, given that there was a significant number of immigrants who were adherents of religions other than Christianity in Birmingham at that time. The 1988 Education Reform Act necessitates multi-faith religious education, because it states that religious education should take other principal religions represented in Great Britain into consideration (8:3).

In the past religious education was content-centred, but studies in the sixties made religious education child-centred. The stimulus for these studies came from the educational and

[32] This is due to the fact that Roman Catholics have generally sent their children to their own faith schools, and therefore they have shown little interest in religious education in state schools (Jackson, 2004).

psychological developments (Copley, 2008). These studies revealed that the content of religious education satisfied neither professionals nor students. At that time, the most influential studies were those of Goldman and Loukes (Jackson, 1990). Loukes (1961) argued that pupils found religious instruction 'childish' and irrelevant to life (Loukes, 1961:150). Loukes (1961) argued that, therefore, the content of RE needed to be changed and it should based on life themes, which would be more interesting to children. Goldman (1964) claimed that the content of religious education was not suitable for children. According to him, children under the age of thirteen were not capable of understanding abstract religious concepts and the Bible. Hence, they should be removed from the curriculum until that age.

4.1.2. TURKEY

Officially, Turkish religious education has never aimed at being denominational. For instance, in 1949 when religious education returned to state schools, Tahsin Banguoğlu, the then-Minister of National Education, ordered a book for religious education which did not include denominational differences. As a result, all Alevi families sent their children to religious education without fearing denominational proselytising[33] (Banguoğlu, 1984). Although religious education officially has never been based on one denomination, in practice, it was denominational until the 2000s (Kaymakcan, 2006). Especially on matters of worship, it generally took the views of Sunni-Hanafi School, and ignored other denominations.

Regarding confessional teaching, from 1924 to 1929, Turkish religious education included obvious confessional elements (Doğan, 2004), but the confessional approach to religious education weakened and the emphasis on ethics increased after 1949 (Doğan, 2004). This was owing to the fact that in 1939 Turkey became legally a secular state. During the debates on religious education in 1982, when religious education was introduced as a compulsory subject, the supporters of religious education stressed that religious education would aim at increasing religious knowledge of children, not making them more religious (Bilgin, 2004 and Selçuk and Doğan, 2007). Although the Basic Law of National Education stated that 'Turkish national education is based on secularism' (MEB, 1983: 12) and this made Turkish religious education non-confessional, until 2000, religious education accepted Islam as the only true-divine faith and described Christianity and Judaism as corrupted divine religions, and Hinduism, Buddhism and etc as non-divine, man-made religions (Kaymakcan, 2006 and

[33] At that year, in order to get religious education, families had to give a letter to the school (see the chapter 3.1.).

2007). This shows that religious education was implicitly aimed at nurturing Islamic faith. The curriculum change in 2000 made religious education non-confessional, because it removed this kind of classification which was the last remnant of confessional religious education (Kaymakcan, 2006).

With regards to multi-faith religious education, Turkish religious education has never been characterised as multi-faith religious education. As mentioned earlier, the name of Turkish religious education is 'religious culture and ethics knowledge'. According to Kaymakcan (2007), the name suggests that more than one religion is to be taught in the lesson. However, other religions were given a small place until 2005, and they were generally described as corrupted or non-divine religions until 2000. The change in the curriculum in 2000 and 2005 increased the emphasis given to other religions. The 2005 curriculum argued that other religions should be given more consideration due to globalisation. As a result, 10 per cent of the curriculum was devoted to other religions (MEB, 2005), but this percentage is insufficient for it to be multi-faith religious education.

Religious education was content-centred, and there was no relevance to current life and children experience in the past (Kaymakcan, 2006). The first curriculum which described itself as child centred was the 2000 Religious education Curriculum. The 2005 curriculum also described itself as child-centred (learner-centred) but according to Kaymakcan (2007) the program is still content-centred. Turkish religious education still has to improve its content in order to make it child-centred.

4.1.3. COMPARISON

Denominational religious education has never existed in community schools in England; this was due to Christian plurality in society. Likewise, Turkey has officially never had denominational religious education, because of the presence of different denominations. Although Turkish religious education was in practise denominational due to the lack any law which prevents denominational teaching, the changes in the curriculum made religious education non-denominational (Kaymakcan, 2006). As can be seen, the reason for having a non-denominational religious education is plurality within English and Turkish society.

Confessional teaching aims at nurturing into a particular religion/faith. Both countries had confessional religious education once. However, confessional religious education gave way to

non-confessional teaching due to international trends. In England, secularisation and plurality made almost impossible for community schools to foster one particular faith (Barnes and Wright, 2006). In Turkey, secularisation played a major role in the shift towards non-confessional religious education.

Multi-faith religious education emerged in England as a response to plurality deriving from immigration. There were many people who describe themselves as adherents of religions other than Christianity. Although in Turkey multi-faith religious education has never emerged, because there was no such multi-faith society, the emphasis given to other religions increased due to globalisation. As Jackson (2003a and 2009b) argues, the degree and the nature of plurality in society is a contextual factor which differentiates the type of religious education. It is obvious that due to the difference in the degree of plurality, Turkish and English religious education diverges in providing multi-faith religious education.

As regards to child-centred religious education, both countries initially had content-centred religious education, but the developments in educational and psychological studies brought about child-centred religious education to England in the nineteen seventies, and these studies influenced Turkey in the 2000s.

The reasons why Turkish religious education was slow in embracing non-confessional, non-denominational and child-centred religious education are important. The first reason might be that in England religious educators have been the members of Schools or departments of education and they do not have any link with their fellows in theology (Copley, 2008), while in Turkey, religious education has been a sub-discipline of theology until 2000 and they did not have any link with their counterparts in the education department. Today there are religious educators under both education and theology faculties, even though the majority is under theology faculties in Turkey. This is probably why Turkish religious education was confessional and denominational for a long time contrary to the legislation. The second reason can be that until 1982, religious education did not have a strong presence in Turkey. Therefore, religious educators generally focused on justifying the need for religious education in state schools and could not find enough time to give attention on preparing materials and producing methods for religious education (Altaş, 2002; Ayhan, 2004; Doğan, 2004 and Çelik, 2008), but in England, religious education obtained a degree of importance in state schools with the 1944 Education Act. Therefore many research have been conducted since 1944 in England (Francis, 2004 and Copley, 2008) and these researches have resulted in

innovations in religious education while in Turkey, the works of religious educationalists since 1982 brought about the 2000 Curriculum, which made many innovations in religious education (Ademoğlu, 2008).

In conclusion, the history of religious education curricula of England and Turkey in terms of general trends was compared. The similarities are that England and Turkey have non-denominational, non-confessional and child-centred religious education due to international trends such as secularisation, plurality and educational and psychological developments[34] (for other European countries, see Willaime, 2007 and Schreiner, 2007). The differences are England has a multi-faith religious education, while Turkey does not have. This is due to the degree of plurality in society. The comparison also made it clear that Turkish religious education was slow in terms of embracing non-denominational, non-confessional and child-centred religious education. The reasons were Turkish religious education was in a fragile position until 1982 and Turkish religious educationalists were the members of theology departments until 2000.

4.2. THE CURRENT SITUATION

Any curricula were not compared in the chapter 4.1 because there have been no national curricula for religious education in England, but locally agreed syllabuses which likely varied according to local authorities. However, in this section, two curricula will be compared. In England in 1994 and 2004, model syllabuses were published, so we can pick a curriculum from England. The dissertation chooses the 2004 Non-Statutory Framework because it is the last one[35]. In Turkey, there have been national curricula which have been legally binding. Curricula are revised with minor changes every year, but according to eminent Turkish educationalists, two curricula (2000 and 2005) were the watershed in Turkish religious education (Tosun, 2004; Kaymakcan, 2006 and 2007).

4.2.1. ENGLAND

Religious education is part of the basic curriculum, but not part of the national curriculum. Religious education is still being formed by locally agreed syllabuses. As a response to the desire for quality and standardisation (Meredith, 2006), model syllabuses and non-statutory

[34] It can be argued that educational and psychological developments are also an international trend, because many countries have been influenced by the same studies.
[35] The dissertation is aware that the 2004 Non-Statutory Framework is not a curriculum, but a framework.

frameworks were produced. In 1994 the School Curriculum and Assessment Authority produced two model syllabuses. It was a kind of centralisation for religious education. The Agreed Syllabus Conferences could choose to use them, ignore them, edit them or borrow from them.

In 2004, the Non-Statutory National Framework was published. It is worth noting that English law did not change in order to make the Framework possible and locally agreed syllabuses remained[36]. The responsible government department for it was the Department for Education and Skills. The aim of the framework is to raise the standards of religious education (QCA, 2004). The framework was consulted with faith communities and professional religious education associations before being published.

It starts with the children's views on religious education. According to Jonathan, age 12: religious education is 'the most important school subject' (QCA, 2004: 6). The national framework has four aims: to establish an entitlement and standards, to promote continuity and coherence and to promote public understanding (QCA, 2004).

The first eighteen pages outline the targets of religious education, how religious education helps to promote key skills and other aspects of curriculum. According the law, religious education is a compulsory subject. The framework interprets the law as all registered children from Key Stage 1 to Sixth Form should be taught religious education. Pupils in nursery schools do not have to study religious education (QCA, 2004). Nevertheless the framework gives what pupils from age of 3 to 19 should study in religious education (pp. 19-32). The appendix 'General Teaching Requirements' (pp. 38-46) is part of every national curriculum.

In the framework, there are sections on knowledge, skills and understanding and breadth of study. This is the same as other national curricula (QCA, 2004).

Knowledge, skills and understanding is described as learning about religion and from religion. Learning about religion includes 'knowledge and understanding of individual religions and how they relate to each other as well as the study of the nature and characteristics of religion' (QCA, 2004: 11). Learning about religion is 'concerned with developing pupils' reflection on and response to their own and others' experiences in the light of their learning about religion.

[36] According to Jackson and O'Grady (2007), in the future, a national syllabus for religious education can be produced, but in order to do that, a new legislation is needed.

It develops pupils' skills of application, interpretation and evaluation of what they learn about religion' (QCA, 2004: 11)[37].

As stated earlier, the change of the name of the lesson from 'religious instruction' to 'religious education' shows that religious education does not include the confessional element anymore. As a result, confessional targets cannot be seen in the framework. Likewise, due to the Cowper-Temple Clause, the framework is not based on any denomination.

The 1988 Education Reform Act prescribes the content of religious education by mentioning Christianity and other principal religions (section 8:3). The framework interprets the law as such: at every key stage, pupils should be taught Christianity and other principal religions (Islam, Judaism, Buddhism, Hinduism and Sikhism) should be taught by the end of the Key Stage 3. These five religions are seen as 'other principal religions represented in Great Britain'[38]. Although the law does not mention secular philosophies like humanism and other religious traditions such as Zoroastrianism, according to the framework, they can also be taught. At Key Stage 1, at least one other principal religion, a religious community, and a secular worldview should be taught. At Key Stages 2 and 3, the number of other principal religion to be taught rises to two, and the number of secular worldviews and religious communities remain the same.

Regarding the aims, religious education should develop 'pupils' knowledge, understanding and awareness of Christianity, as the predominant religion in Great Britain, and the other principal religions represented in the country; to encourage respect for those holding different beliefs; and to help promote pupils' spiritual, moral, cultural and mental development' (DfE, 1994, s. 16). Interfaith dialogue, the celebration of diversity and community cohesion should be encouraged (QCA, 2004).

In England, the moral development of children is the responsibility of all school subjects, but religious education has a unique role in promoting moral development. Religious education should promote citizenship and personal, social and health education (PSHE) (QCA, 2004). It is worth noting that in England citizenship and PSHE have their own curricula, but their targets should be achieved through other school subjects.

[37] Although these terms were produced by Michael Grimmitt, they are now different from what Grimmitt intended (see Grimmitt 2000).
[38] These five religions plus Christianity appeared first in the book of Cole 'Six religions in the twentieth century' (Cole, 1985). These six religions are also apparent in the 2001 Census.

4.2.2. TURKEY

There is a national curriculum for religious education in Turkey. Two national curricula are prepared every year: one is for pupils from the fourth to eighth grades; another is for pupils from the ninth to twelfth grades, but they are similar. The first major change in religious education occurred in 2000. With this change, religious education in theory shifted from confessional teaching to a more pluralistic religious education (Kaymakcan, 2006). The second crucial change was made in 2005, when general education underwent transformation in Turkey. These curricula were prepared by academics from the Theology Faculty at Ankara University, teachers and experts in curriculum. There was no formal or informal consultation with faith communities.

The dissertation chose two curricula to draw the whole picture: the 2005 curriculum for secondary schools and the 2006 curriculum for elementary schools[39]. The responsible government department for them was the General Directorate of Religious Instruction, which works under the Ministry of National Education. According to the curricula, there are 6 learning fields in the primary school: Faith, Worship, Prophet Muhammad, Qur'an and its Interpretation, Ethics and Culture (MEB, 2006) and 7 learning fields in secondary school: Faith, Worship, Prophet Muhammad, Revelation and Logic, Ethics and Values, Religion, Culture and Civilisation (MEB, 2005).

The curriculum (2005) includes how to measure religious education (pp. 31-37), subjects and targets (pp. 44-72), stories (pp. 81-97), notes for teachers (pp. 99-138), activities (pp. 139-220), assessment and evaluation (pp. 221-234) and bibliography[40].

According to the 1982 Constitution, religious education is a mandatory subject in primary and secondary schools (TBMM, 1982). The curricula interpret religious education as obligatory for pupils from 4th grade to 12th grade according to the law.

The curricula embrace learning *about* religion rather than learning religion. The omnipresence of Islam attracts attention in the curricula but it does not mean that the lesson aims at fostering

[39] In 2005, the curriculum was only for secondary schools, but in 2006 the curriculum for primary school was also published. Their introduction are almost the same, therefore the dissertation uses generally the first one: the 2005 Curriculum.
[40] The 2006 Curriculum is almost same.

Islamic faith. It is clear that the aim is to raise individuals who make astute judgements in the issues of faith, and to give pupils knowledge on religion (MEB, 2005 and 2006).

Moreover, the curricula pay a great deal of attention to moral (ethics) education; one part of the the name of the lesson is tellingly 'ethics knowledge'. Therefore the aim of the lesson is not only to give knowledge on religion, but also to help students to internalise moral values and virtues (MEB, 2005 and 2006).

The curricula made clear that religious education is non-denominational, because denominations are man-made (MEB, 2005 and 2006). Although the curricula prior to 2000 ignored the Alevi faith, the 2005 Curriculum gave information about it, and devoted 5 reading materials out of 9 to Alevi faith, which is an innovation (MEB, 2005).

When Islam is taught, the main sources are the Quran and Hadith (the tradition of Muhammad). There are 49 hour lessons out of 288 related to the Quran in primary schools (MEB, 2006).

Turkish law mentions neither Islam nor other principal religions. Therefore, the curricula can interpret the law widely. The 2005 and 2006 curricula give Islam priority. From 4th to 7th grades, the only religion to be taught is Islam. At the 8th grade, 14 hours (there are 72 hours at the 8th grade in total) are devoted to Christianity, Buddhism, Hinduism and Judaism under the title of the living religions. In secondary schools, from the 9th to 11th grades again Islam is only religion taught. At the 12th grade, 7 hours out of 36 hours are devoted to Christianity, Judaism, Hinduism, Buddhism, Jainism, Sikhism, Taoism, Confucianism and Shinto (MEB, 2005). Additionally, atheism and agnosticism are also included (MEB, 2005). Religions other than Islam account for ten per cent of religious education in secondary schools. The reason for the inclusion of other religions is due to globalisation. The curriculum argues that with increasing interaction between societies, pupils should be taught about the religions of the world (MEB, 2005).

Regarding the aims, religious education should provide knowledge about religion, Islam and ethics and develop virtuous and ethical individuals. Religious education should be in harmony with the Turkish national educational policy, its principles and aims, and the principles of Ataturk, especially secularism. In this way, religious education should strengthen Kemalism (the way of Ataturk), solidarity, humanitarianism and national unity from an ethical and

religious perspective (MEB, 1992). Religious education should help to create citizens who promote and protect the cultural, moral, spiritual, human and national values of Turkey (MEB, 2005). Tolerance should be encouraged (MEB, 2006).

4.2.3. COMPARISON

Religious education is a separate subject and therefore it has a separate curriculum paper in both countries, but the basic difference between two curricula is that Turkish curriculum is a curriculum paper which is required to be used in all state schools, while the English one is a framework which is not legally binding with the aim of proving a suggested structure to local syllabuses. It is worth noting that locally agreed syllabuses are prepared for community, voluntary-controlled and foundation schools. Voluntary-aided schools have a right to use their own curriculum for religious education. So the non-statutory framework is not a model for all state schools in England. The non-statutory framework emerged to meet the desire for national standards for religious education. However, local education authorities still have to reflect the demands of local communities when they prepare their syllabuses (QCA, 2004)[41].

When the framework was prepared, there were consultations with faith organisations in England, but in Turkey, there was no formal or informal consultation with faith organisations. The absence of such consultation was caused by state secularism in Turkey.

Both the English framework and Turkish curricula embrace non-denominational religious education. The reason is that both countries have denominational plurality.

In Turkish religious education, the dominant religion is Islam and in the English, Christianity. It can be said that this is understandable, because Turkey is a predominantly Muslim country and England a Christian country. Islam and Christianity have a deep effect on Turkey's and England's literature, customs, architecture and art respectively, therefore without these religions Turkey's and England's culture cannot be understood (see Burn and Hart, 1988).

However the stress on a particular religion does not make English and Turkish religious education confessional. As Willaime (2007) argues, non-confessional teaching does not

[41] For instance the 2007 Birmingham Agreed Syllabus differs from the framework on many points. The Birmingham syllabus did not suggest teaching six principal religions and changed both the order and the name of the targets from 'learning from religion' to 'learning from faith' and from 'learning about religion' to 'learning about religious traditions'. According to Barnes, these changes are important, because they show that the Birmingham syllabus has 'a different understanding of the nature of religion' (Barnes, 2008b: 80).

necessitate sparing the same time for each religion. When religious education does not have confessional aims, it becomes an educational subject rather than theological subject. This is a direct effect of secularism and plurality on both countries.

The important difference between the Turkish and English curriculum is that when they deal with their main religious traditions (Islam and Christianity respectively) their sources differ. Turkish religious education is based on the Quran, while English religious education is not based on the Bible directly. In the sixties, the works of Goldman led to the removal of the Bible from the syllabuses of religious education (see the chapter 4.1.). However, Turkish religious education gives a great deal of attention to the Quran, because, according to the curriculum (2005) the Quran is the most fundamental source of Islam. Hence students are expected to study the Qur'an and its interpretation. Another reason is the fear of falling into denominational teaching. It is interesting to note that likewise, in England religious education (instruction) was reduced to the Bible until the nineteen sixties in order to avoid denominational teaching (Thompson, 2004).

Although English religious education gives Christianity priority, it can be classified as multi-faith religious education, because of the portion of the lesson given to other religions. However, Turkish religious education cannot be regarded as a multi-faith religious education owing to the fact that just ten per cent of religious education in secondary schools is devoted to other religions. The reasons for the inclusion of other religions differ from England to Turkey. English religious education includes other religions because these religions apparent from the plural society, but in Turkey there is no such plural society, with its 99 percent Muslim population (Selçuk and Doğan, 2007). Therefore Turkey uses globalisation as the main argument for the inclusion of other religions. Although their reasons are different (globalisation for Turkey and plurality for England), Turkey and England arrive at the same conclusion: religions other than Islam (Turkey) and Christianity (England) should be taught in religious education.

Both countries exclude new religious movements, ethnic religions, and nature religions and there is no obvious reason for the omission.

With regards to the aims of religious education, England and Turkey aim at providing a deep understanding of their main religious traditions: Christianity and Islam respectively. This is due to strong cultural link between country and religion.

To promote tolerance and respect for others are one of the key aims of the subjects in both countries. This is partly due to the existence of conflicting religious beliefs in the society and partly due to the international organisations which both countries are a part. For instance, the Recommendation 1202 of the Council of Europe (1993) stressed that due to mobility within Europe and migration, tolerance become top on the agenda.

Moral development of pupils is the common target of the both countries' education and religious education. Nevertheless there is a fundamental difference between England and Turkey concerning the link between moral and religious education. In Turkey, moral and religious education is regarded as closely related as seen from its name 'Religious culture *and* ethics (moral) knowledge'. Moral is one of the six learning fields in the curricula and should be taught 56 hours (out of 360 hours) in primary school (MEB, 2006) and 24 hours (out of 144 hours) in secondary school (MEB, 2005). The curriculum explicitly argues that in order to prevent a corruption of morals, people need religion. Religious education is of importance, because pupils learn religion properly in these lessons (MEB, 2005). The aim of religious education is to help students to internalise moral values and virtues (MEB, 2005). However in England, moral and religious education has been seen as different subjects since the nineteen seventies. While in the fifties nobody thought that religious (Christian) and moral education was disassociated (Hillard, 1963), in the sixties and seventies, due to secularism and plurality, religious education changed its character and henceforth, religious education and moral education was separated (Jackson, 2003b). It was argued that the strong link between Christianity and morality would be harmful for those who do not hold any religious belief (Hillard, 1963). Working Paper 36 argued that moral education is not dependent on religious education and moral education is a duty of all schools (Schools Council, 1971). From the seventies, religious education adopted the multi-faith model for moral education whose aim was to prepare pupils to live in a multi-faith society by promoting tolerance, and respect (Barnes, 2008a). The reason for the difference between England and Turkey on this issue is that England has a multi-faith and secular society, but Turkey has a single-faith society.

Both countries form a link between citizenship and religious education. The link between citizenship and religious education has followed the same trend in Turkey and England. In the past, there was no citizenship education in both countries, and religious education and other subjects in the curricula have a duty to promote citizenship. Later, both countries felt that this is insufficient (see Jackson, 2003a and 2003b and Miedema, 2007), so discrete citizenship

education was introduced in 1998 in Turkey (citizenship and human rights education) and 2002 in England (citizenship education) (Jackson, 2003b and Erdem, 2005). International organisations stress the importance of citizenship education; a reason why a discrete citizenship education was introduced in both countries is without doubt international organisations.

An important difference between Turkey and England is that compulsory religious education starts at the 4th grade in Turkey, but at the 1st in England. It might be argued that this can cause a crucial difference between English and Turkish pupils' understanding and knowledge about religion. For instance, when children become ten in Turkey, they do not know anything about religion unless their families give them information about it, while in England, even though families do not educate their children on religion, when they reach the age of 10, they already know about Christianity (QCA, 2004), at least one of the principal religions (p. 24), one religious community and a secular worldview (p. 25) have visited a religious place (p. 23) and listened to religious stories (p. 22). In this regard, Turkish pupils are unfortunate, because pupils start to ask questions about religion at an early age and therefore, it is better to start teaching religion to pupils in the first grade[42].

In conclusion, the dissertation compared the Non-Statutory Framework for Religious Education (QCA, 2004) with the National Curriculum for Religious Education (MEB, 2005 and 2006). The main similarities are that religious education is a separate school subject and has separate curriculum papers in both countries; both countries espouse non-denominational religious education due to plurality within society; both countries give priority their own religions (Islam in Turkey and Christianity in England) which have shaped their culture; due to secularism (plus plurality in England), both countries have non-confessional religious education; both countries exclude new religious movements, ethnic religions, and nature-based religions; both countries' religious education followed the same trend in terms of the relation between citizenship and religious education, due to international formal trends; both countries now have citizenship education apart from religious education; both countries give a great deal of attention to promote tolerance and respect due to their plural societies and they take part in the same international organisations like OSCE and the Council of Europe. However, there are obvious differences: the papers compared are different in terms of being compulsory; due to state secularism in Turkey, there was no formal or informal consultation

[42] Bilgin argues that religious education should start when children start to ask questions about religion (Bilgin, 1988).

with faith communities, while in England there were such consultations; England has a multi faith religious education, but Turkey does not have because of the lack of multi-faith society; there is a close link between moral and religious education in Turkey, but there is no close link in England due to the secular and multi-faith society; Turkish religious education is based on the Qur'an due to the fear of denominational teaching; English religious education starts at 1st grade but Turkish religious education at fourth grade which the dissertation found unfortunate for Turkish pupils.

5. CONCLUSION

In conclusion, the comparison between Turkish and English religious education in state schools informs us that England and Turkey has many similarities. These similarities have generally been caused by international formal and informal trends. Nevertheless, there are also differences, which have been accounted for by contextual factors.

In both countries, education has undergone a complete transformation. England and Turkey had religiously-inspired education systems: almost all schools were related to religious organisations until 1870 in England and until 1924 in Turkey, but over time religion became an ordinary classroom subject, which can be broadly termed 'religious education' in spite its different name in Turkey (religious culture and ethics knowledge). The control of religious organisations over their schools has continued in England, but Turkey abolished all religious schools (madrasah) due to state secularism.

The main questions of the dissertation were what are the main similarities and differences in religious education in state schools in England and Turkey and how can they be explained?

The main similarities are that religious education is a separate school subject and has its own curricula in both countries. This is the fundamental similarity, which makes the comparison between English and Turkish religious education possible. There are laws which determine religious education in both countries, even though these laws have different characters (the constitution and laws on education in Turkey, education acts in England). Both countries have non-denominational, non-confessional and child/learner-centred religious education. Both countries give priority their own religions (Islam in Turkey and Christianity in England) over other religions. Other religions find a place in English and Turkish religious education. The promotion of tolerance and respect for others is stressed in both countries' religious education.

It can be argued that the most important characteristics of English and Turkish religious education, which prove that both countries have been affected by the same trends, are that they have non-denominational, non-confessional, child-centred and plural religious education. In the past religious education in both was confessional, content-centred and single-faith (and

denominational in Turkey). Non-confessional religious education was brought by secularism and plurality which have been influential in both countries. Non-denominational religious education had to be implemented because both countries have had different denominations (plurality). Although religious education in both countries gives priority to their own religions (Islam in Turkey and Christianity in England), which have shaped their culture, their religious education also includes other religions as well. This is the result of plurality (in England) and globalisation (in Turkey). The presence of a conscience clause is another indicator of international trends. Although England introduced the conscience clause in 1870 and there is no universal conscience clause in Turkey, the reason why a conscience clause has a strong place in England and why Turkey will introduce the right to withdraw in the near future is human rights legislation and the recommendations of international formal organisations. Tolerance and respect are the common targets of religious education in both countries. These aims have been set out due to fact that England and Turkey have plural societies (plurality) and they take part in the same international organisations like OSCE and EC (international formal trends).

The comparison makes clear that there are also obvious differences in the religious education of England and Turkey. The contextual factors have led to these differences. There has never been the absence of religious education in England, but there was an absence of it for 19 years (1930-49) in Turkey due to the strict secular measures. Local administrations are involved in religious education in England owing to the tradition of decentralisation while in Turkey there is strong centralisation of religious education. Turkish religious education was slower than England in espousing non-denominational, non-confessional and child-centred religious education because of the fact that religious education did not have a strong place in state schools until 1982 and religious educationalists were the members of theology faculties until the 2000s in Turkey. There were no formal or informal consultations with faith organisations in Turkey and Islam has not been mentioned in the law due to the state secularism. There is a universal right to withdraw in England, but limited right in Turkey: this makes religious education a right in England, but a right and duty in Turkey.

It is clear from the comparison that the English system represents diversity with its different kinds of state schools and religious education while Turkey holds on to uniformity. In Turkey, there is one type of school in terms of their relation with religion and one type of religious education, while in England there are different kinds of schools and religious education. For

instance, voluntary-aided schools can offer denominational and confessional religious education, but this is not the case in Turkey, where all schools have to use the national curriculum. This difference between Turkey and England reflects their national imaginaries (see the chapter 1). Turkey approves one kind of religious education in order to produce one type of citizen, whilst England approves plurality. This is the fundamental difference between England and Turkey.

Comparative studies should be sensitive to contextual differences, but it does not mean that national processes are immune to criticism. It can be claimed that it is better to offer different forms of religious education, because some parents, for instance, find better and appropriate for their children to have denominational and confessional religious education. Moreover, the dissertation found it problematic that both countries give the right to withdraw to families rather than children. Turkish religious education starts four years later than English religious education, which makes pupils in English state schools more fortunate than their Turkish counterparts. The strong centralisation in religious education in Turkey has slowed innovation and reforms and has not allowed different actors to take part in religious education.

The dissertation found terminological differences between England and Turkey such as the usage of the term 'compulsory' (zorunlu in Turkish) and the terms 'education and instruction' (eğitim ve öğretim in Turkish) (the chapter 3).

It is argued in the methodology that this dissertation would inform international organisations which make policies on religious education. These organisations should consider the terminological differences as well as contextual differences that the dissertation pointed out, when making policies on religious education. Another implication of the dissertation might be that the criticisms made in the dissertation can accelerate the process of change which it is believed, would make Turkish and English religious education better.

It is obvious that further research is needed to examine other vital issues of religious education such as the training of religious education teachers; how teachers deliver the lesson; what the views of teachers and students on religious education are; and who influences and makes laws pertaining to religious education and curriculum papers. Moreover, there is a need for an English perspective because this comparative research between England and Turkey is from a Turkish perspective. It is believed that this dissertation will be a valuable starting point for future research.

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