Is there a Retreat from Multiculturalism?

The Case of Education Policies in the United Kingdom and Germany

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Abstract

Multiculturalism has been one of the policy responses to the increased immigration in several Western European countries since the 1960s. Yet recently it has been severe criticized. There is a claim popularized by Christian Joppke that there is a wholesome retreat from multiculturalism, which is replaced by converging civic integration policies across Europe. The other side of the debate challenges this idea stating that multiculturalism is compatible with some forms of civic integration policies. The advocates of multiculturalism, most notably Will Kymlicka, argue that there is little evidence of immigration policies' convergence among European states.

The thesis ties up with this debate by focusing on multicultural policies in the area of education. It contributes to the debate by providing evidence of multicultural education policies development in two countries – the United Kingdom and Germany. It tests the question of convergence or divergence of multicultural policies by looking at current developments in a longer historical perspective. The findings show that despite noteworthy differences in the immigration profiles, political, social and education systems, the two countries exhibit similar dynamics in their multicultural education policies development since the 1960s. These findings support Joppke's argument about the convergence of integration policies. However, it is preliminary to claim the retreat from multiculturalism which is still present at least at the local level in the field of education policies of two big European countries. In this regard, it is possible to support Kymlicka's position on the question of retreat from multiculturalism.

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Introduction

Most Western European countries nowadays have considerable immigrant populations.[1] Since the end of World War II these countries have relied on immigrants to facilitate their economic growth, which is now threatened by the continent's decreasing and aging population. Yet immigrants and refugees are often seen as a problem rather than a benefit. They are treated as competitors for jobs, a burden on the welfare state and possible agents of global terrorist organizations. Despite the need for immigrant labor, most citizens in European countries express support for restrictionist immigration policies.

The need to accommodate majority preferences with minority rights has always been a dilemma for policymakers. Over the past decades, there have been various policy responses to increased immigration: the assimilation model, guestworker model, and multiculturalism. In the 1960s and 1970s several European countries introduced multiculturalism in attempt to recognize immigrant minorities' interests.[2] Already in 1997 American sociologist Nathan Glazer declared "we are all multiculturalists now".[3] However, recently multiculturalism has become the central point of political and academic debates. Several politicians have condemned it. German Chancellor Angela Merkel announced in 2010 that multiculturalism "failed, utterly failed".[4] A year later British Prime Minister David Cameron echoed the backlash against multiculturalism.[5] French president Nicolas Sarkozy joined them by

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[1] In 2010, 6.5% of the EU population are foreigners (20.2 million - citizens of non-EU countries and 12.3 million - citizens of another Member State), Katya Vasileva, "Population and social conditions", *Eurostat 34,* 2011, http://epp.eurostat.ec.europa.eu/cache/ITY_OFFPUB/KS-SF-11-034/EN/KS-SF-11-034-EN.PDF

[2] Multicultural policies may also refer to indigenous people and historical national ethnic minorities, Will Kymlicka, *Multiculturalism: Success, Failure, and the Future* (Washington, DC: Migration Policy Institute, 2012).

[3] Nathan Glazer, *We Are All Multiculturalists Now*, (Mass: Harvard University Press, 1997).

[4] BBC News, "Merkel says German multicultural society has failed", October 17, 2010, http://www.bbc.co.uk/news/world-europe-11559451

[5] BBC News, "State multiculturalism has failed, says David Cameron", February 5, 2011, http://www.bbc.co.uk/news/uk-politics-12371994

portraying multiculturalism as a failure.[6] Moreover, European Commissioner, Franco Frattini, condemned multiculturalism on behalf of the whole Europe.[7] Yet there is no general consensus among politicians in European countries, or even within the Coalition Government in the UK. For example, Nick Clegg, the Deputy Prime Minister of the UK, rejected the backlash against multiculturalism and expressed his support for multicultural policies.[8]

Similar debates occurred within academic circles. Two questions have dominated the field of scientific research. The first is a normative question which deals with the appropriateness of multiculturalism as an immigrant integration policy. The second is whether there is a retreat from multicultural policies in practice.

Within the normative debate, skeptics of multiculturalism say that it fosters segregation and promotes prejudice instead of tolerance and trust between people. For example, Miller accuses multicultural policies of paying too much attention to differences and thus negatively affecting nation-building and a sense of national unity.[9] Similarly, Barry claims that multiculturalism slows down the integration of immigrants, creates social mistrust and hampers national unity.[10] Koopmans reinforces this position by claiming that multicultural policies do not motivate immigrants to acquire local language and establish interethnic relations.[11]

In contrast, proponents of multiculturalism argue that it positively affects both the local population and minorities. For example, Kesler and Bloemraad contend that

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[6] The Telegraph. "Nicolas Sarkozy declares multiculturalism had failed", February 11, 2011
http://www.telegraph.co.uk/news/worldnews/europe/france/8317497/Nicolas-Sarkozy-declares-multiculturalism-had-failed.html
[7] Council of Europe, "Address by Franco Frattini", January 25-28, 2010, http://hub.coe.int/address-by-franco-frattini
[8] BBC News, "Nick Clegg sets out vision of multiculturalism." February 3, 2011,
http://www.bbc.co.uk/news/uk-politics-12638017
[9] Stephen Castles and Mark J. Miller, *The age of Migration: International population movements in the modern world* (Basingstoke: Palgrave Macmillian, 2009).
[10] Brian Barry, *Culture and equality: an egalitarian critique of multiculturalism*, (Cambridge MA: Harvard University Press, 2002).
[11] Ruud Koopmans, "Trade-Offs between Equality and Difference: Immigrant Integration, Multiculturalism and the Welfare State in Cross-National Perspective", *Journal of Ethnic and Migration Studies, 36:1,* 2010, 1-26.

multicultural policies do not undermine immigrants' engagement in societal institutions and do not weaken trust among people.[12] Similarly, Banting et al. suggest that multicultural policies do not have a negative impact on national commitments in regard to redistributive policy.[13] Moreover, Soroka et al. advocate that multicultural policies positively affect the correlation between national identity and support for immigration.[14]

Within the debate about a retreat from multiculturalism, two leading scholars – Will Kymlicka and Christian Joppke – offer opposite theoretical approaches to explain a trend of multicultural policies development. Joppke argues that there is a wholesome retreat from multiculturalism across liberal states, which is due to the lack of public support, the deficiencies of the policies themselves, especially in socio-economic respect, and the new assertiveness of the liberal states in regard to the respect for "one's own culture".[15] Moreover, he claims that currently liberal countries are leaving behind national models of inclusion and converging with respect to the general direction and content of integration policy.[16] The convergence is attributed to the fact that multicultural policies are being replaced with the policies of civic integration (in the form of the requirements for obligatory language and country-knowledge acquisition).[17]

Kymlicka counters Joppke's claims by stating that even though multiculturalism is in retreat in certain countries, notably in the Netherlands, there has not still been a retreat from all multicultural policies in all countries.[18] He finds it misleading to treat the shift to civic

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[12] Christel Kesler and Irene Bloemraad, "Does immigration erode social capital? The conditional effects of immigration-generated diversity on trust, membership, and participation across 19 countries, 1981–2000", *Canadian Journal of Political Science 43, No. 02* (2010): 319-347.

[13] Banting, Keith, and Will Kymlicka. Multiculturalism and the Welfare State: Recognition and Redistribution in Advanced Democracies. Oxford: Oxford University Press, 2006.

[14] Stuart Soroka and Sarah Roberton, "A literature review of Public Opinion Research on Canadian attitudes towards multiculturalism and immigration, 2006-2009", Citizenship and Immigration Canada Report, 2010, http://www.cic.gc.ca/english/pdf/research-stats/2012-por-multi-imm-eng.pdf

[15] Christian Joppke, "The retreat of multiculturalism in the liberal state: theory and policy", *The British Journal of Sociology, Volume 55 Issue 2*, 2004, 254

[16] Christian Joppke, "Beyond National Models: Civic Integration Policies for Immigrants in Western Europe", *West European Politics, 30* (1), (2007): 1-22

[17] ibid.

[18] Kymlicka, 2012

integration as a retreat from multiculturalism and argues that multicultural policies are generally consistent with those forms of civic integration policies which are not coercive and assimilationist.[19] Additionally, Kymlicka points out to the data from the Multiculturalism Policy Index[20] and Civil Integration Policies Index (CIVIX)[21] to illustrate divergence in immigration policies across Europe.[22]

While there is much research done in regard to the normative debate, there is still a lack of evidence supporting either side of the debate about the retreat from multiculturalism, especially at the policy level, because shifts in public discourses are not necessarily followed by the policy changes. It is still unclear whether it is possible to distinguish a trend of decline of multicultural policies.

In order to contribute to the debate about the retreat from multiculturalism, this thesis will provide the analysis of multicultural policies in the field of education in the United Kingdom and Germany. I address the question of whether the UK and Germany have exhibited similar or divergent dynamics in the development of multicultural education policies over an extended period of time. This will reveal current developments in a longer perspective and thus support either Kymlicka's or Joppke's positions.

This area of education is chosen because the key goals of education policies have always been attributed to social cohesion; therefore, education plays an essential role in facilitating the immigrants' integration into a given society.

The overarching methodology is the theory-testing case study. By applying this method, it will be possible to provide evidence in favor of either of the two rival approaches. As a point of departure in choosing the case studies I use the Multiculturalism Policy Index.[23]

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[19] Kymlicka, 2012, 19
[20] Multiculturalism Policy Index, http://www.queensu.ca/mcp/ (accessed March 10, 2013)
[21] Sarra W.Goodman, "Integration Requirements for Integration's Sake? Identifying, Categorizing and Comparing Civic Integration Policies", *Journal of Ethnic and Migration Studies, 36:5*, (2010): 753-772
[22] Kymlicka, 2012, 19-20
[23] Multiculturalism Policy Index

The United Kingdom and Germany are particular interesting for this debate. Even though these countries have not explicitly endorsed multiculturalism, some policies inspired by multicultural ideas have been in place there, even if to a lesser extent in Germany than in the UK.[24] Both have the highest percentages of immigrant populations relative to the native population in comparison to other countries.[25] As both countries are well established democracies and members of the European Union, they share the same values and norms and adopt the same regulations. Furthermore, both countries have experienced similar debates on "crisis of multiculturalism".[26]

Yet these countries differ in their immigration profiles, immigration-related legislation, education systems, and political, social, economic structure of the society given their different historical trajectories. One of the key differences is the nature of their immigrant populations: while in Germany most immigrants are contract workers who originally were intended to stay temporarily in the country, in the UK immigrants are mostly from former colonies. Furthermore, they have different education systems.

Considering the similarities and differences between the UK and Germany, these countries represent good case studies for analyzing the development of multicultural education policies in a historical perspective. The analysis will included the education policies introduced in these coutnries since the 1960s – the time when there were first attempts to deal with ethnic, cultural and religious diversity caused by the arival of immigrants. The policies of the immediate post-WWII period will be treated as a context for understanding how and why multicultural policies were adopted. The review of the education policies development in both countries draws mainly from secondary sources.

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[24] ibid.

[25] In 2010 there were 7.0 million foreign-born residents in the UK - 11.3 % of the total population, and 6.4 million in Germany - 12 % of the total population, Katya Vasileva, "Population and social conditions", *Eurostat 34,* 2011

[26] BBC News, "Merkel says German multicultural society has failed", October 17, 2010, http://www.bbc.co.uk/news/world-europe-11559451; "State multiculturalism has failed, says David Cameron", February 5, 2011, http://www.bbc.co.uk/news/uk-politics-12371994

In the first chapter I will explore the definitions of "multiculturalism" and "multicultural policies". I will also provide the definition of "multicultural education" and outline the indicators of multicultural education policies. In the second and third chapters I will review education policies in the UK and Germany starting from 1945. Following this, in the fourth chapter I will compare and analyze education policies on the basis of the indicators developed in the first chapter (adoption of multiculturalism in school curricula; mother tongue, biliguism and national language acquisition; religious education; training and recruitment of teachers). Finally, I will highlight the findings in the conclusion.

Chapter 1: Conceptual and Theoretical Framework

1.1. Definitions of Multiculturalism and Multicultural Policies

Since the post-1945 period, there have been different policy responses to the increased international migration. In Europe there have been three most prominent models. The first is characterized by the assimilation/republican model of inclusion (e.g. France) - the process of immigrants' integration through the complete absorption of norms and values of the host country.[27] The second is the guestworker (*Gastarbeiter*) model which is built on the assumption that the immigrants will leave the country upon the end of their contract, and thus integration is not an issue. Yet this model emphasizes the immigrants' right to keep their culture and traditions while staying in the host country.[28] As for third model, it is built on different meanings attributed to the concept "multiculturalism".

The term "multiculturalism" can be used to describe an ethnically diverse community, an ideology, and a set of public policies managing the interaction between ethnic groups.[29] As a demographic description, multiculturalism refers to the presence of ethnically, religiously and culturally diverse populations within a society.[30] As a philosophical position, it treats ethnic and/or cultural diversity as a phenomenon that should be recognized and respected.[31] As set of policies, multiculturalism refers to recognition of cultural differences and facilitates the integration of minorities' into mainstream society.[32]

This thesis is less concerned with multiculturalism as a description of diversity or political philosophy. It is focused on multiculturalism in terms of policy. Though there are

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[27] Brubaker 2003 cited in Ellie Vasta, "Accommodating diversity: why current critiques of multiculturalism miss the point." Working Paper No. 53, Centre on Migration, Policy and Society, 2007, 4
http://www.compas.ox.ac.uk/fileadmin/files/Events/Events_2007/WP075%20Accom%20Div%20Vasta.pdf
[28] ibid.
[29] Stolle et al., "Religious Symbols, Multiculturalism and Policy Attitudes", (paper presented at the workshop "The Political Psychology of Diversity" held during the Canadian Political Science Association Annual Meeting, Edmond, AB, June 15-17, 2012), http://www.cpsa-acsp.ca/papers-2012/stolle.pdf
[30] ibid.
[31] ibid.
[32] ibid.

multicultural policies relating to indigenous people and historical national ethnic minorities[33], this thesis will mainly deal with the policies concerning immigrants because these policies are highly disputed and criticized.

Reviewing the literature on multiculturalism as policy, it is difficult to find a precise definition of the term "multicultural policies". Broadly speaking, "multicultural policies" are the policies that "go beyond the protection of the basic civil and political rights guaranteed to all individuals in a liberal-democratic state, to also extend some level of public recognition and support for ethno-cultural minorities to maintain and express their distinct identities and practices".[34] More precise definition is given by Bleich who defines passive and active multicultural policies. While passive multicultural policies aim at recognizing ethnic diversity by making some exceptions for ethnic or religious minorities, yet limiting the impact of these changes on the local population, active multicultural policies attempt to create a new national culture by embracing both majority's and minorities' perspectives.[35]

Ellie Vasta summarizes different definitions into two key principles of multicultural policies: social equality and participation, and cultural recognition.[36] According to the first, immigrants should have an opportunity to participate in all social institutions and strive for social equality.[37] According to the second, immigrants should be able to practice their language and religion and to organize associations, thus gaining social and institutional cultural recognition.[38] These definitions will be most suitable for defining education approaches in the chapter on the comparative analysis of education policies.

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[33] Kymlicka, 2012

[34] Will Kymlicka and Keith Banting, "Introduction: Multicukturalism and the Wealthfare state: setting the context", in K. Banting and W. Kymlicka (ed) *Multiculutralism and the Welfare state: Recognition and Redistiribution in contemporary Democracies*, (Oxford: Oxford University Press), 2006, 1

[35] Erik Bleich, "From International Ideas to Domestic Policies: Educational Multiculturalism in England and France", *Comparative Politics, Vol. 31, No.1*, 1998, 82

[36] Vasta, 2007

[37] ibid.

[38] ibid.

1.2. Current Definitions of Multicultural Education

In order to tie into the existing debate about the retreat from multiculturalism, I have chosen the area of education since this field has always been attributed to facilitating social cohesion and shaping attitudes towards a nation. By setting the development of education policies alongside the debates over multicultural policies, I will be able to contribute to the broader debate on the retreat from multiculturalism. To identify the direction of developments in multicultural education policies in the UK and Germany, it is necessary to clarify the meanings of the concept "multicultural education". To date, there are a large number of definitions describing multicultural education. This fact underlines the emergent status of the field and the lack of complete agreement about the goals and scope of multicultural education.

Gay summarizes the variety of definitions into three main categories. The first one identifies multicultural education as a concept, idea or philosophical viewpoint. In this regard, multicultural education denotes a set of belief that recognizes the significance of ethnic and cultural diversity and promotes educational opportunities for all individuals and groups.[39] The National Association for Multicultural Education, for instance, sees multicultural education in sense of "philosophical concept built on the ideals of freedom, justice, equality, equity, and human dignity..."[40]

The second category identifies multicultural education as a reform movement. Jay and Jones refer to multicultural education as the revision of educational structure, procedures, substance and values of the educational initiatives which should correspond to the social, cultural and ethnic diversity in a society.[41]

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[39] Geneva Gay, "Curriculum theory and Multicultural Education", in *The Handbook of Research on Multicultural Education* ed. Banks J.A. (San Fran cisco: Jossey-Bass, 2001), 33
[40] National Association of Multicultural Education, "Definitions of Multicultural Education", 2011, http://nameorg.org/names-mission/definition-of-multicultural-education/
[41] Gregory Jay and Sandra Elaine Jones, "Whiteness studies and the multicultural literature classroom", Melus: *The Journal of Society for the Study of Multi-Ethnic Literature of the United States, 30 (2),* 2005: 99-121

The third category defines multicultural education as a process. Nieto points out that multicultural education is an inclusive process that challenges questions of diversity, provides equal participation, rejects racism and discrimination, and sustains pluralism (ethnic, religious, cultural).[42]

The definition given by Banks and Banks illustrate all three categories:

"Multicultural education is an idea, an educational reform movement, and a process whose major goal is to change the structure of educational institutions so that male and female students, exceptional students, and students who are members of diverse racial, ethnic, language, and cultural groups will have an equal chance to achieve academically in school."[43]

Banks and Banks also add that the term "multicultural education describes a wide variety of programs and practices related to educational equity, women, ethnic groups, language minorities, low-income groups, and people with disabilities".[44]

Since this thesis contributes to the debate about multiculturalism, I do not take into account the broad scope of some definitions of multicultural education which go beyond what is defined as multicultural policies (e.g., disability, talent). The normative aspect of the definitions, that is the category that defines multicultural education as a philosophy, is also beyond my focus. That is why the definition of multicultural education used in this thesis is narrowed down to the one focusing on a set of educational programs and policies concerning inter-ethnic, inter-racial and intercultural issues.

The most appropriate definition is the one crafted by Nieto. Her definition corresponds to the demarcation of multicultural policies defined by Vasta. Nieto's definition reinforces the principle of social justice and equal participation which are the compulsory attributes of multicultural education. She also stresses the importance to recognize diversity. Moreover,

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[42] Sonia Nieto, *Affirming diversity: The sociopolitical context of multicultural education* (3rd ed.), (New York: Longman, 2008).
[43] J.A. Banks and C.A. Banks, *Multicultural education: issues and perspectives.* 4th ed: John Wiley, 2001, 1
[44] ibid.,

this definition resembles Bleich's definition of active multiculturalism, since multicultural education is a pervasive process, meaning that it is important to all pupils, teacher and the whole school community, not just ethnic minorities.[45]

1.3. Indicators of Multicultural Education Policies

In developing the set of indicators which will be used for the analysis of education policies of the UK and Germany, I rely on the conceptual framework identified in the previous section. I also use the dimensions and characteristics of multicultural education suggested by leading scholars in the field of education, political science and public policy: Banks, Nieto, Vertovec and Wessendorf.

Firstly, Banks identifies five dimensions of multicultural education: a) content integration, b) knowledge construction, c) prejudice reduction, d) equity pedagogy, and e) empowering school culture and social structure.[46] The first dimension refers to the use of examples and data from culturally and ethnically diverse groups to explain concepts and theories in a certain discipline.[47] The process of knowledge construction denotes the way in which knowledge in various subject areas is constructed and how it is affected by cultural, racial and ethnic perspectives of different individuals and groups.[48] The component of prejudice reduction defines the characteristics of students' racial assumptions and involves strategies that can help pupils to develop democratic attitudes towards all people regardless of their race.[49] Equity pedagogy refers to the use of techniques and methods that help pupils from diverse backgrounds to succeed academically.[50]

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[45] Nieto, 2008
[46] James A. Banks and C. A. M. Banks, *Handbook of Research on Multicultural Education*, (2nd ed.), (San Francisco: Jossey-Bass, 2004), 50–65.
[47] ibid.
[48] ibid.
[49] ibid.
[50] ibid.

Secondly, Nieto and Bode distinguish seven characteristics of multicultural education.[51] First, it is *antiracist*. Second, it is basic, that is it is as acute as reading, writing, or mathematics.[52] Third, it is *important for all pupils*, not just those who are from minority groups.[53] Fourth, it is *pervasive*, meaning that multicultural education is a part of all aspects of school life, not only relations among teacher and pupils, but also a whole school community. [54] Fifth, multicultural education facilitates *social justice*.[55] Sixth, as a *process* it is an ongoing development of pupils and educational institutions.[56] Seventh, it is *rooted in critical pedagog*y, meaning that it is built on experiences and knowledge of both teachers and pupils.[57]

Finally, Vertovec and Wessendorf offer additional dimensions of multicultural education policies identified in the broader debate on multiculturalism. Among them are the following measures: consideration for dress codes; recognition of gender specific practices and other specific issues sensitive for the representative of different ethnic groups; mother-tongue teaching and language support; the establishments of minorities' own schools (usually faith schools, publicly or privately financed); hiring of bilingual or migrant teachers in schools.[58]

Consequently, most of these dimensions deal with the recognition of cultural, ethnic and religious diversity and equal participation of immigrant minorities in the education process. Yet some of them are iterative or can be regarded as a part of one parameter of multicultural education. Therefore, it is possible to create such clusters of multicultural education indicators as:

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[51] S. Nieto and P. Bode, *Affirming diversity: The Sociological context of multicultural education* (5th ed.), (Boston: Allyn & Bacon, 2008), 44
[52] ibid.
[53] ibid.
[54] ibid.
[55] ibid.
[56] ibid.
[57] ibid.
[58] Steven Vertovec and Susann Wessendorf, *The Multiculturalism Backlash: European discourses, policies and practices,* (London; New York: Routledge, 2010), 3

1) Multiculturalism in school curriculum: adoption of curriculum that integrates the background of ethnic minority pupils in its content and facilitates knowledge construction process and promotes prejudice reduction and antiracism;

2) Language support: mother tongue teaching; bilingual educational programs and/or a national language acquisition;

3) Religious education: introduction of ethnic minorities' religious classes in public schools; establishment of minority groups' own religious schools; consideration of gender-specific practices and other issues sensitive to the values of ethnic minorities (e.g. exemption from dress codes);

4) Teacher education: teacher training on multicultural education and recruitment of teachers with a migrant background.

These four clusters of indicators will serve as a structure for the comparative analysis of education policies in the UK and Germany. Not all of them will be weighted equally; a country-specific context will be taken into account. For example, the criterion of having bilingual education was not crucial in the early 1960s in the UK when most migrants were from former colonies and spoke English as a mother-tongue. Before proceeding to this comparative analysis, I will first review British and German education policies in the following chapters.

Chapter 2: An Overview of Education Policies in the United Kingdom

In this chapter I will provide an overview of British education policies in regard to the compulsory education. Obligatory schooling is currently divided into primary education (ages 5–11), secondary education (ages 11–17 (from 2013, and up to 18 from 2015), and tertiary education (ages 18+).[59] Even though I am mainly concerned with multicultural education, a brief description of education policies preceding the adoption of multicultural policies will allows me to place multiculturalism in the context and to define general trends within and across states. Alongside the description of policies, I will show historical context since any assessment of policy changes requires some comprehension of the social phenomena to which educational responses are made.

Taking into account Bleich's definition of multicultural policies, four phases are identified. In the early post WWII period there were no policies addressing ethnic and racial diversity ("laissez-faire" approach), or they tried to assimilate minorities into British society ("assimilationist approach", "education for the disadvantaged", "Immigrant education", "integrationist education", etc). This period is treated more as a context for understanding why and how multiculturalism was adopted and therefore is less integrated in the analysis. In the mid-1960s assimilationist approach was replaced by passive multicultural policies ("pluralist", "antiracist"). From the late 1970s to the late 1980s active multiculturalism dominated the policy-development. Since the late 1980-s multicultural policies have been under serious attack with the exception of a brief push toward active multiculturalism from the late-1990s to the mid-2000s.

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[59] UK Legislation, http://www.legislation.gov.uk/ukpga/2008/25/contents. See the Diagram 1 in the appendix.

2.1. From 1945 to the mid-1970s: From Laissez-faire and Assimilation to Passive Multiculturalism

In the post-war period the homogeneously "white" British society became diversified with the arrival of some 500, 000 immigrants from post-colonial countries (mostly West Indies).[60] The British Nationality Act of 1948 granted citizenship to all Commonwealth citizens, and thus both native population and immigrants were considered equal before a color-blind law.[61] There was no consideration of special educational provisions to deal with them (so called "laissez-faire" approach).[62] It was assumed that immigrants would easily adapt to British way of life, especially given the fact that most of them spoke English as a mother tongue. In religious education, for instance, Birmingham's syllabus defined in 1962 that "we speak of religious education, but we mean Christian education…"[63] There was also no intervention in the issues of race.

Yet the lack of official response and the existence of an implicit assumption of cultural superiority allowed discriminatory actions against immigrants to remain unchallenged. Starting in 1948 there were a series of riots in which the local white population attacked black immigrants (e.g., riots in Notting Hill, London, in 1958).[64] Following these social phenomena, in the early 1960s, the national government issued a number of documents which marked the shift from the "laissez-faire" approach towards an assimilationist stance. For example, the Report of Ministry of Education, *English for Immigrants,* emphasized the importance of teaching English for promoting assimilation, while mother-tongue and minority cultures teaching were not seen as school matters.[65]

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[60] Focus Migration, "United Kingdom", Country Profile No. 12, http://focus-migration.hwwi.de/United-Kingdom.2708.0.html?&L=1

[61] British Nationality Act, 1948, http://www.legislation.gov.uk/ukpga/Geo6/11-12/56/contents

[62] Peter Figueroa, "Multicultural Education in the United Kingdom: Historical Development and Current Status", in Banks J.A. & Banks, C.A., *Handbook of research on multicultural education,* (San Francisco: Jossey-Bass, 2001), 780

[63] Bleich, 84

[64] Figueroa, 781

[65] Ministry of Education, *English for Immigrants*, (London, H.M.S.O., 1963).

In 1965 the policy of dispersal was adopted, according to which no more than 1/3 of disadvantaged pupils could be concentrated in one school. At that time the national government did not differentiate between pupils of immigrant background from disadvantaged ones and thus did not provide additional funding for schools with immigrants.[66] This policy was highly opposed by liberal organizations and ethnic communities themselves. It was felt unfair that only immigrant children were dispersed and implied the fear of white parents that their children's schools would be flooded by black pupils.[67] It was believed to be not in the interest of ethnic minorities' children who might be worse-off in a distant school away from the secure atmosphere of their communities.[68] Moreover, there was also some evidence of teachers' prejudice and discrimination against immigrant children.[69] The claims for equality, non-discrimination and cultural recognition became more intense.

Thus, in the mid-1960s with the arrival of the new Labor party there were significant modifications in education policies as it could be expected with the change of the ruling party. The assimilationist approach began being replaced by multiculturalism. Although this shift was not immediate, already in 1966 the new home secretary, Roy Jenkins, declared integration as a new approach, defined "not as a flattening process of assimilation but as equal opportunity, accompanied by cultural diversity, in an atmosphere of mutual tolerance."[70] The change of the ruling party back to the Conservative Party in 1970 did not cause the changes in the development of education policies since education was still a responsibility of local education authorities at that time.

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[66] Beesan T. Sarrouh, "The Impacts of Britain's and Ontario's MEP on Muslim Students in Secular", 2012, 3 http://www.readbag.com/utoronto-ca-ethnicstudies-sarrouh,

[67] Martin McLean, "Education and Cultural Diversity in Britain: recent immigrant groups", *Comparative Education, Vol. 19, No.2*, 1983, 186

[68] ibid., 186

[69] ibid., 184

[70] Bleich, 84

Until the mid-1960s most teachers lacked knowledge about the backgrounds of ethnic minority children; they were often influenced by their racial beliefs, and had low expectations of immigrant children's performance.[71] Teachers paid limited attention to racism, only in the sense of color prejudice, since racism was not considered to be a matter of school education.[72] They believed that "prejudice" and "discrimination" were rare in schools and preferred not to draw attention to these issues.[73] Starting in 1964 the National Committee for Commonwealth Immigrants supported conducting of training for educators. Throughout the decade there were different courses and seminars for teachers of immigrant children. Not all of them dealt with teaching English as a second language, some were also devoted to the issues of prejudice and cultures of immigrants' countries (e.g., 1966 Conference for educators towards a Multi-racial Society).[74] Additionally, the Local Government Act 1966 provided 50% rate (later 75%) support grant for issues related to the education of immigrant pupils such as teaching of English (later also mother-tongue) and generally with multicultural education.[75]

Another positive development after the mid-1960s was some acceptance of minority religions in public schools. Even though Christian religious education was a legally compulsory subject in public schools, some consideration for specific practices and issues sensitive to the minorities' religious values was introduced.[76] Certain compromises were made in regard to the issues of dress and food. As an example, religious clothing was permitted if it corresponded to the colors of pupils' uniform, or vegetarian and halal lunches were allowed to be served in schools.[77] Later, in 1971, the Schools Council published the paper "Religious Education in Secondary Schools", in which it declared the move towards an

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[71] Sally Tomlinson, "Multicultural Education in the United Kingdom", in James A. Banks, *The Routledge International Companion to Multicultural Education,* (NY: Routledge, 2009).
[72] Figueroa, 785
[73] ibid., 785
[74] ibid., 783
[75] Local Government Act, 1966, http://www.educationengland.org.uk/documents/pdfs/1966-local-government-act.pdf
[76] McLean, 188-189
[77] Bleich, 84

"undogmatic approach" that does not "promote any one religious viewpoint."[78] Yet, there was still a conflict between a state 100% financial support of Christian and Jewish schools and a refusal to provide funds for Muslim and Sikh separate religious teaching.[79]

Within the school curricula some consideration of ethnic minorities' cultures was also introduced. Though, the goal was mainly to promote mutual respect and tolerance among different ethnic groups rather than to facilitate the development of a systematic way for ethnic minorities to study their own culture.[80] This method of teaching about ethnic diversity is often labeled as a 'cultural tourist' approach with the 3S ('saris, samosas and steel bands').[81]

In short, the policies of this period relating to immigrants' education were changing by accommodating some of the ethnic minorities' rights and interests, but still minimizing the impact of changes on the majority. That is why they can be referred to only as a passive multiculturalism.

2.2. The mid-1970s to the late 1980s: Active Multiculturalism

British "laissez-faire" and assimilationist approaches to immigrants might have been effective until the late-1970s in its intent to avoid social tensions due to demographic distribution and fragmented nature of cultural demands of ethnic minority groups. Most immigrants from former colonies did not strive for cultural recognition. They were more concerned with their economic disadvantages and the role of schools in changing it, rather than with transmitting their culture.[82] As for Asians and Muslims, they were economically prosperous and could open privately funded part-time religious schools.[83]

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[78] ibid., 84
[79] McLean, 188
[80] ibid.
[81] Yasmin Alibhai-Brown, *After Multiculturalism*, (London: Foreign Policy Centre, 2000).
[82] McLean, 188
[83] ibid.

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In contrast, the immigrant inflows of the mid-1970s and early 1980s were larger and more diverse in their linguistic and religious characteristics. In this period the largest increase in immigrant population occurred, when some 600,000 immigrants were added to the total population.[84] There was also shift in the countries of origin. In 1978, over 10% of school pupils in London spoke a language other than English as a mother tongue.[85] Almost half of these children were originally from Mediterranean countries (e.g. Cyprus, Spain, Portugal, and Italy) and their parents were determined to preserve mother tongue and culture among their children.[86] Muslims also began to ask for support to pass Islamic culture to their children.[87] Education was one of the fields in which urgent changes were most required.

In the mid-1970s when the Labor party was in power, the UK was officially recognized as a multicultural society by the national government.[88] Since 1975 there were significant efforts to design education policies in such a way that they would encompass changes in education of both immigrants and natives.[89] The 1974 Report *Teacher Education for a Multi-cultural Society* stated that teachers should be prepared not only to teach English as a second language, but also to deal with low performance and to fight against prejudices and discrimination.[90] It suggested incorporating multicultural courses in teacher education programs and to make more effects to recruit ethnic minority teachers.[91] The *All London Teachers Against Racism and Fascism* group also declared that curriculum change had to address teachers' own racism.[92]

Shortly after the Report of 1974, Department of Education and Science (DES) issued another report in 1975 and recommended to include in school curricula the teaching of

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[84] Focus Migration, "United Kingdom", Country Profile No. 12, http://focus-migration.hwwi.de/United-Kingdom.2708.0.html?&L=1
[85] ibid.
[86] ibid.
[87] ibid.
[88] Bleich, 84
[89] ibid., 84
[90] Figueroa, 788
[91] McLean, 184
[92] Tomlinson, chapter 4, par. 2

different cultures and religions, through such subjects as geography, religious education, history and current affairs, thus ensuring better understanding of the national and cultural background of immigrant pupils.[93] Additionally, the Bullock Report of 1975 declared that "schools should help maintain and deepen knowledge of [immigrants'] mother-tongue."[94] Already in 1976, many schools - both primary and secondary - did implement these recommendations to their curricula.

At the same time the question of schools' dress code was raised. After the Race Relations Act of 1976[95] exemptions were granted not only from uniforms of the UK police and military but from school uniforms, trying to respond to students' religious beliefs (e.g., the hijab was allowed).[96] However, there was no legal regulation, and exemptions were granted on an individual basis.[97] For instance, a bilingual support worker was prohibited to wear her veil during classes, since the veil hid her mouth and was hindering the learning process.[98]

With the change in party composition of the government in the late 1970s from Labor to Conservative, there were changes some changes in social and legal context. For example, the British Nationality Act was amended in 1981: it was necessary for at least one parent of a child born in the UK to be a British citizen or a permanent resident.[99] Furthermore, the 1980-1981 riots in Bristol, London, Liverpool, and Manchester, and parts of the West Midlands were a clear sign of protest against ethnic disadvantage and discrimination.[100] Consequently, the claims for cultural recognition became stronger at that time.

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[93] Figueroa, 785
[94] A. Bullock, *A language for life: The Bullock Report*, (London: Her Majesty's Stationery Office, 1975), http://www.educationengland.org.uk/documents/bullock/
[95] Race Relations Act, 1976, http://www.legislation.gov.uk/ukpga/1976/74
[96] Audrey Osler, "Citizenship education, communities and multiculturalism", *British Politics Review, Volume 6, No. 2*, (2011): 8
[97] ibid.
[98] McLaren 2006, in Multiculturalism Policy Index
[99] Nationality Act, 1981, http://www.legislation.gov.uk/ukpga/1981/61
[100] McLean, 186-187

It was the Rampton Report of 1981 that was the first official document at the national level which stressed that all Local Education Authorities (LEAs) need to appoint a multicultural education advisor and "teachers [should] play a leading role" in bringing changes in attitudes of the majority towards ethnic groups.[101] Despite the fact that education was still mainly the responsibility of LEAs and they had freedom to choose what policies to adopt, by 1981, about twenty-five LEAs designated an advisor[102] and by the late 1980s about eighty of the 108 LEAs adopted multicultural or antiracist policies.[103] The most noteworthy move to active multiculturalism in that time was marked by the publication of the 1985 Swann Report, *Education for All.* It recommended "to look ahead to educating *all* children, from whatever ethnic group, to an understanding of the diversity of lifestyles and cultural, religious and linguistic backgrounds…"[104]

Following these reports, some of their recommendations were accepted by the government even though it would not have been expected given the fact that the Conservative party was again chairing the government. In fact, already in the early 1980s, there were many vocal attacks on multiculturalism from the side of the Prime Minister Thatcher, her education secretary and right-wing groups, who were stressing in their statements that British schools were supposed to promote British culture.[105] As it was already mentioned, education was primarily the responsibility of local education authorities, thus it was decentralized in the early period of the Thatcher government.

Despite the countercurrents from the national level, the criteria for multicultural education were set, and some funds for curriculum development projects and for in-service

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[101] Rampton, *West Indian Children in our Schools: Rampton Report*, (London: Her Majesty's Stationery Office, 1981) http://www.educationengland.org.uk/documents/rampton/
[102] Bleich, 85
[103] ibid.
[104] Department of Education and Science (DES), *Education for All: The Swann Report,* (London: HMSO, 1985), 316 (emphasis in original)
[105] Bleich, 86

teacher trainings were allocated.[106] Between 1985 and 1989 around £3 million was spent to support 119 projects aimed at influencing the attitudes of white pupils.[107] The university and college education departments were required to include courses to prepare future teachers to educate in a multicultural society. The Center for Multicultural Education was opened at the Institute of Education in London.[108] In that time the DES also officially recommended the mother tongue teaching for minority pupils. The Union of Teachers proposed to schools "to make it clear by means of posters, notices, story books that ethnic minority languages are held in equal regard to English."[109]

2.3. The late 1980s to the mid-2000s: Partial Retreat from and Return to Multiculturalism

The UK's immigration profile of the late 1980s and early1990s dramatically changed from the picture prior to that time. Immigration became larger and more diverse in its composition. In 2001, 4.9 million (8.3% of the total population) of immigrants more than doubled the proportion of the population since the 1960s.[110] The earlier waves of immigrants were mainly from New Commonwealth countries, while the inflows of the 1990s involved immigrants from some European countries, Canada, Australia, New Zealand, India, Pakistan, Bangladesh, the Caribbean, and several African countries.[111] Additionally, some changes in legislation have been introduced. First of all, with the arrival of the Conservative party, the British Nationality Act was amended: the pure *jus soli* principle[112] for getting citizenship was ended. The early 2000s also marked the shift in economic recruitment from low to highly

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[106] Tomlinson, chapter 4, par. 5
[107] Bleich, 85
[108] Tomlinson, chapter 4, par. 6
[109] ibid.
[110] Focus Migration, "United Kingdom", Country Profile No. 12, http://focus-migration.hwwi.de/United-Kingdom.2708.0.html?&L=1
[111] Will Somerville, "United Kingdom: A Reluctant Country of Immigration", in The Migration Information Source, 2009, http://www.migrationinformation.org/feature/display.cfm?ID=736
[112] *jus soli* principle - a right according to which citizenship is granted to a person born on the territory of the related state

skilled laborers to satisfy the demands of the information age. In 2006, the point system was adopted, which allocated applicants according to their skills and the needs of labor market.[113] Yet the process of naturalization was made more complicated, including the introduction of citizenship and language tests since 2002.[114] Consequently, the education system was restructured twice, reflecting two different political positions of that period on how it should meet the needs of society.

During the last term of the Thatcher government, the Education Reform Act (ERA) was introduced in 1988, with an aim to change the education system in such a way that it would generate a highly competitive workforce. The ERA did bring some positive changes, namely the Commission for Racial Equality was launched to manage policy on race relations in schools, and several legal initiatives were implemented to address equality, anti-racism and multiculturalism in education.[115]

Yet the burden of integration was shifted back to immigrants themselves. With the adoption of the National Curriculum[116], the government took away substantial power over education policies from LEAs.[117] This led to the whole change of decentralized education system to a centralized one. As it will be seen in the fourth chapter, the change from decentralized to centralized system will have effect on the development of multiculturalism in comparison to the German system which has always had a federalist set-up.

Since the content of the National Curriculum was decided by government-appointees, there was significant political interference in the process. The most disturbing factor was the re-interpretation of school subjects. Religious education, for example, was again considered to

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[113] Focus Migration, "United Kingdom", Country Profile No. 12, http://focus-migration.hwwi.de/United-Kingdom.2708.0.html?&L=1
[114] ibid.
[115] Sarrouh, 5
[116] National Curriculum refers to England and Wales only.
[117] ibid.

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be of Christian nature as it was prior to 1971.[118] Even though there was a notion that the National Curriculum should promote equality in a multicultural society, school subjects continued to focus mainly on British and European history, traditions and values with little or no consideration of ethnic minorities' backgrounds.[119]

The teacher training courses, introduced in the 1980s in many universities and colleges began to disappear.[120] Funding was mainly directed to encourage competition between schools for the best performance results.[121] The mother-tongue was considered as an alternative to modern European languages and suggested only to secondary schools, although ethnic minorities made claims for mother tongue teaching for their children in primary schools.[122]

However, despite this evident backlash against multiculturalism and move towards assimilation, some multicultural (antiracist or equal opportunities) policies continued to exist in many schools, especially in the areas with a high proportion of immigrants. For example, consideration for ethnic minorities' clothing and food was still present in some places.[123]

When the Labor Party came to power in 1997, there was an abrupt turn in the policy development back to active multiculturalism. Prime Minister Tony Blair promised to revise education policies and expressed great support for multiculturalism.[124] Some of the reforms stayed in line with those of the Thatcher government, while others clearly aimed at promoting cultural diversity. For example, the White Paper "Excellence for Schools" stated that it was the student's responsibility to excel in school, and thus integration was considered mainly the student's duty.[125] However, in 1999 recognition of diversity was incorporated in the National

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[118] Tomlinson, chapter 5, par. 3
[119] ibid
[120] ibid.
[121] Sarrouh, 6
[122] McLean, 188
[123] Bleich, 86
[124] ibid.
[125] Department of Education and Science (DES), White Paper: Excellence in Schools, (London: Her Majesty's Stationery Office, 1997).

Curriculum. Following the Crick report, in 2002 citizenship education was introduced to school curriculum which aimed at promoting human rights, anti-racism, anti-discrimination and multiculturalism.[126] It became an official strategy for promoting community cohesion defined as "the development of a common vision among all communities; valuing people's diverse backgrounds; making available similar life opportunities to all…"[127] To this end, the government started providing special funding for programs which facilitated the connections between people from different backgrounds.[128]

Another positive development of the late-1990s was support for ethnic minority religions. Followers of Islam and other faiths were given the right to open state-funded schools equally with Anglican, Catholic and Jewish schools.[129]

Multicultural ideals were also back in the pedagogy of teacher training. The Teacher Training Agency, for instance, produced guidelines which emphasized that all teachers should help pupils to live in a culturally diverse society. This agency also launched a network website for teachers which included information on ethnicity issues (www.multiverse.ac.uk) and a site for English as a second language (www.naldic.org.uk).[130] Though, it should be admitted that there were still a few face-to-face courses for teachers.[131] As for the recruitment of teachers, due to the dramatic increase in daily absences and retirement among local teachers, thousands of teachers with a migrant background were employed from overseas (Australia, New Zealand, South Africa, and the Caribbean).[132]

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[126] B. Crick, Education for citizenship and the teaching of democracy in schools: the Crick Report, (London: Department for Education and Skills (DfES), 1998).
[127] ibid.
[128] Osler, 8
[129] Tomlinson, chapter 6, par. 2
[130] ibid.
[131] ibid.
[132] Miller et al, "International Teacher Migration and the Commonwealth Teacher Recruitment Protocol: Assessing Its Impact and the Implementation Process in the United Kingdom", *European Education, Vol. 40*, No.3, 2008, 90

2.4. The mid-2000s to the Present Day: Back to Assimilation?

Starting in the early 2000s and especially since the mid-2000s, immigration to the UK has become even more diverse. It has also become more temporary in its nature following the accession of new member states to the EU in 2004 and 2007.[133] The number of foreign-born people has also increased. In 2005, labor immigrants of total over 400,000 represent the second highest figure in Europe, after Germany.[134] In 2010 there were 7.0 million immigrants (11.3 % of the total population).[135] Moreover, there have been changes in social context. Following violent disturbances in Bradford and in several other towns, and especially after the terrorist attacks in New York (9/11) and the London bombings (07/07/05), there has been increased mistrust of immigrants (especially Muslims). Due to the economic crisis, immigrants have now been seen as competitors for jobs or as a burden on the welfare state. Moreover, there has been increasing concern about national identity which is supposedly aggravated by the growing non-Christian population. These concerns have strongly influenced public perceptions of diversity. Since mid-2000s multiculturalism has often been blamed for allowing ethnic minorities to live "parallel lives" and not properly integrate into British society.[136]

These social changes led to the shift in the development of education policies even without a party change. In response to growing concerns regarding the economy, security and identity, one of the government's decisions was to encourage immigrants' integration through citizenship teaching.[137] In 2007, citizenship curriculum was reviewed and a new one was adopted in 2009, which incorporated Ajegbo's recommendations to bind citizenship education

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[133] Somerville, 2009
[134] Focus Migration, "United Kingdom", Country Profile No. 12, http://focus-migration.hwwi.de/United-Kingdom.2708.0.html?&L=1
[135] Eurostat, 2011
[136] Herbert et al., "Multiculturalism at work: The experiences of Ghanaians in London", (Department of Geography Queen Mary, University of London, 2006).
[137] Osler, 8

to the promotion of British national identity.[138] Even though citizenship education continues to be a tool for promoting social cohesion, this strategy faces several challenges. The slightly different approaches towards citizenship education in the constituent parts of the UK undermine the potential of citizenship education.[139] The popularity of private Academy Schools across Britain is also a challenge for citizenship education because they are allowed to create their own curricula.[140]

As for the funding of multicultural education, there has been no official support since the early 2000s. Nevertheless, there has been financial aid that has been hidden inside different government-sponsored programs in the form of correctives which are dedicated to minorities, including students with immigrant background.[141] There are different grants to educational institutions based on the number of low-income pupils. For instance, in 2009-2010, through the Ethnic Minority Achievement Grant, schools could get £250 million for language learning.[142] Immigrant children become beneficiaries of this kind of funding, yet there are no longer comprehensive policies that aim directly at integrating immigrants.

In regard to teacher training and recruitment, there have not been any seminars or courses exclusively aimed at providing multicultural education. Yet following Ajegbo's recommendation,[143] there have been teachers' courses on citizenship education. The Qualifications and Curriculum Development Agency provides materials to support the teaching of citizenship.[144] Teacher recruitment from outside the European economic area (EEA) has been significantly reduced. Notably, few teachers are now recruited from the

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[138] K. Ajegbo, "Curriculum Review: Diversity and Citizenship", (DfES, 2007).
[139] Rhys Andrewsn and Andrew Mycock, "Citizenship Education in the UK :Divergence Within a Multi-National State", *Citizenship Teaching and Learning Vol 3, No. 1*, (2007).
[140] Richard Race, "Teaching the multicultural in education: balancing and fine tuning." *British Politics Review, Volume 6, No. 2*, (2011): 7
[141] Shamit Saggar and Will Somerville, "Building a British Model of Integration in an Era of Immigration: Policy Lessons for Government", (Washington, DC: Migration Policy Institute, 2012): 14-15
[142] ibid.
[143] Ajegbo
[144] Miller et al, 2008

Caribbean region due to the fact that their qualifications are often held as not equivalent to UK qualifications, while this is the opposite with qualifications of teachers from the EEA.[145]

Since 2010, with a change of the ruling party, the rhetoric of the government coalition under David Cameron's leading has become very vocal in terms of its strong opposition to multiculturalism which is blamed for fostering immigrants' segregation. No specific changes in education policies have yet taken place. However, the national curriculum has been under review, and it is unknown at the time of writing whether citizenship education and recognition of ethnic, religious and cultural diversity will remain obligatory, and what changes will happen within the education system in the UK.

In summary, an overview of education policies development in the UK since post-war period shows that there have been several shifts in education approaches with the changes in migration profile, social and political context. Moreover, it suggests that there has been at times a mismatch between the political rhetoric and the actual policy. In the mid-1960s there was a move from laissez-faire and assimilationist to passive multiculturalism (policies that accommodate cultural differences of minority pupils, but diminish the effect of changes on education of majority) which later evolved into active multiculturalism (policies effecting the education of all pupils). Since the late-1980s multiculturalism has been under severe attack with a brief push for progressive multicultural policies in the late-1990s. Following violent disturbances and terrorists attacks of the early-2000s, education policies seem to be moving away from multiculturalism, by promoting British national identity which bears some elements of monoculturalism. Yet despite the lack of official support, multicultural education is still in place, especially at the local level.

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[145] ibid.

Chapter 3: An Overview of Education Policies in Germany

After an overview of education policies in the UK, in this chapter I will proceed with an outline of education initiatives concerning immigrant minorities in Germany. The indigenous minorities (Danes, Frisians, and Sorbs) are not taken into account here, since they face no problems with integration, they are fully bilingual and receive financial support for mother-tongue education (if they are interested). The refugees (*Fluchtlinge*) – ethnic Germans expelled from former German territories after WWII – and resettlers (*Aussiedler*) – people of German origin whose ancestry emigrated to Eastern Europe and Asia some time ago – are also less relevant for this study. Although these people face some problems with integration, they fit more or less into the education system, because they are willing to assimilate. Therefore, these minorities are not addressed in this chapter, which focuses on compulsory education of labor migrants' children.

Obligatory schooling starts in Germany from the age of 6 (in some states - 5) and lasts until the age of 18. Children attend primary school (*Grundschule*) until 4th grade (in Berlin and Brandenburg – until the 6th grade), after which based on their achievements they are sent to different types of secondary schools: *Hauptschule* provides a basic general education, *Realschule* – a more extensive general education, and *Gymnasium* – an in-depth general education.[146] There are also comprehensive schools (*Gesamtschule or Mittelschule*) which represent alternative structure of schools in several federal states. They integrate three main braches (*Hauptschule, Realschule* and *Gymnasium*) under one organizational structure.[147] Pupils attend these schools from the 5th to 10th (sometimes 12th) grade.

As the second chapter, this chapter is concerned with the development of multicultural policies, yet multiculturalism is put in the context with other policies in order to trace raise and fall of multiculturalism. Time periods in the education policies development are defined

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[146] See the Diagram 2 in the appendix.
[147] ibid.

according to changes in the historical context. Nevertheless, different educational approaches are often mixed in practice; three phases can be roughly distinguished using Bleich's definition of education policies. The period from the immediate post-war time till the late 1970s with separation and assimilation being the dominant approaches is treated as a contextual period which explains the rise of multiculturalism. Throughout the 1980s and 1990s the assimilationist approach gave way to some multicultural policies ("intercultural", "integrationist", "pluralistic", "anti-racist" or "cooperative"), which were aimed at preserving the mother-tongue identity and culture of immigrant children. Since the early-2000s, an assimilationist approach has again dominated the education policy development.

3.1. From 1945 to the late 1970s: Separation/Preparation and Assimilation (Ausländerpädagogik)

In the immediate post-WWII period the migration history of Germany showed some parallels to that of the UK. While Britain was "white British", Germany was considered "white German", i.e. an ethnically homogeneous state. Yet for rebuilding its infrastructure after the war, West Germany had to recruit workers from abroad. These were initially native Germans from East Germany, Poland, Hungary and Czechoslovakia, but starting from the mid-1950s the government also signed recruitment agreements with Italy, Spain, Greece, Portugal, and Yugoslavia. After 1961 when the Berlin Wall was built, the government additionally welcomed semi-skilled workers from Mediterranean countries - the largest number from Turkey, then Morocco, and Tunisia.[148]

These foreign workers were referred to as guest workers (*Gastarbeiter*) because they were supposed to stay in Germany temporary (maximum five years) and then be replaced by

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[148] Sigrid Luchtenberg, "Migrant minority groups in Germany: Success and failure in education", in James A. Banks, *The Routledge International Companion to Multicultural Education*, (NY: Routledge, 2009), 1

others.[149] However, this rotation model was not convenient for employers, and many workers began to settle down. The Family Reunification Act of 1972 gave them the right to bring their families to Germany. Their settlement increased after 1973 when the world economy was stricken by "oil crisis" and the German government had to impose a ban on recruitment of guest workers.[150] By 1973, immigrants' share in Germany's total population reached 6.7 percent.[151] The most important source country changed from Italy to Turkey (23 percent of all *Gastarbeiter).*[152]

Similar to laissez-faire approach in the UK, during the first decade of guest workers' immigration, the German education system did not address the needs of these workers or their children, as they were seen as temporary laborers who would go back to their countries of origin. The government was concerned that it would encourage *Gastarbeiter* to stay if more educational provisions were introduced.[153] Schooling for guest workers' children became obligatory only in 1964.[154] This created a huge problem for schools, educators and parents. Taking into account that it was not clear how long the guest workers were going to stay in the country, it was quite difficult to decide which objectives the schools should pursue: whether to prepare pupils to succeed in Germany or in the home country.[155]

In this regard, some educational programs were designed to prepare pupils for a later return to the country of origin; others were aimed at facilitating assimilation. The dominant approach at the early stages, *Ausländerpädagogik* (foreigners' pedagogy), was similar to special-needs education and allowed separation of immigrants from other pupils. The

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[149] Kate Gaebel, "The Failed Project of Multiculturalism: The Case of Turkish Immigrants And/In German Education", *The Journal of Multiculturalism in Education, Vol. 7*, (2011): 5
[150] Luchtenberg, 2009, 1
[151] Veysel Oezcan, "Germany: Immigration in Transition", 2004
http://www.migrationinformation.org/feature/display.cfm?ID=235
[152] ibid.
[153] Gaebel, 6
[154] Daniel Faas, "The Europeanization of German ethnic identities: the case of German and Turkish students in two Stuttgart secondary schools", in *International Studies in Sociology in Education,* (Routledge UK 17 (1) 2007)
[155] Gerd R. Hoff, "Multicultural Education in Germany: Historical Development and Current Status", in *The Handbook of Research on Multicultural Education*, ed. Banks & Banks, 2001, 824

'disability' of guest workers' children was that they were not able to speak German and thus to follow school instructions.[156] They were sent to preparation classes (*Vorbereitungsklassen*) and/or intensive German-language courses (*Deutsch-Foerderkurse*).[157] Even though this separation/preparation policy was intended to prepare immigrants' pupils for re-integration into their home country by providing tutoring in their mother-tongue and "home" culture, they did not succeed academically.[158] Instead of recognizing the development of immigrants' culture in Germany, educators at that time focused mainly on the countries of origin, which often resulted in a rather static concept of culture, which reinforced stereotypes.[159]

Following the ban of guest worker recruitment in 1973 and consequent increase in immigrants' population, a full assimilation into the German mainstream society was chosen as the best strategy to deal with the children of those who stayed in the country. Teachers of that time received little or no support with an exception of a few brief in-service trainings, very often provided by people who had no experience in school education and no sufficient skills in second-language teaching. Teachers were left with no choice but to rely on the few existing programs for teaching German as a second language.[160] Only in the late 1970s universities and colleges did start to create guidelines for teachers.[161]

It was difficult at that time to get financial aid for educational projects concerning the needs of immigrant children, mainly because the government still claimed that Germany was not a country of immigration.[162] Regardless of the fact that eventual funding for some educational programs aimed at addressing the changes within German society was granted,

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[156] Faas,
[157] Hoff, 824
[158] Gaebel, 7
[159] Luchtenberg, 2009, 2
[160] Hoff, 826
[161] ibid.
[162] ibid.

still these projects usually appealed to ideas of cultural assimilation to the German *Volk* (nation) and *Leitkultur* (guiding culture).[163]

3.2. The late 1970s to the early 2000s: Multiculturalism - Local, European and Global Dimensions

By the late 1970s it was clear that many guest workers were intended to stay longer or even permanently. Throughout the 1980s their numbers remained constant – at around 4- 4.5 million – 7.3% of the total population.[164] Yet their labor force participation declined. The most important source countries were still the former recruitment states, though some of them gained the right of free cross-border movement after the accession to the European Community (Italy - in 1968, Greece - 1975, Spain and Portugal - in 1992).[165] By that time, a large share of the immigrant population was represented by the so-called second generation, children born already in Germany, but not granted German citizenship because of *jus sanguinis* principle of citizenship law.[166]

At the end of the decade obvious marginalization of large numbers of immigrants (mostly Turks) and educational underachievement of their children forced government officials and educators to acknowledge that deficit-oriented and assimilationist approaches of *Ausländerpädagogik* were not bringing good results. In 1979, Heinz Kühn, the Federal Commissioner for the Promotion of Integration Among Foreign Workers and their Family Members, delivered a speech in which he not only admitted that guest workers were not willing to leave Germany, but also that their children should be integrated in German society.[167] He stressed the necessity to train teachers to better understand the language

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[163] Gaebel, 2
[164] Oezcan
[165] ibid.
[166] ibid.
[167] Heinz Kühn, 1979, in Luchtenberg, 2009, 3

difficulties of immigrant children and also suggested projects that would promote community engagement.[168]

These ideas of integration were furthered despite the change in party composition of government. In 1982, the Christian Democratic Union came to power and Chancellor Helmut Kohl also supported a multicultural stance. He rejected assimilation and emphasized the necessity of integration, which he defined as "not the loss of one's own identity but rather the most frictionless coexistence possible between foreigners and Germans".[169] His speech also marked a shift in rhetoric about guest workers, by using the term *"Ausländer"* (foreigner) instead of *"Gastarbeiter"*; thus recognizing that Turkish and other immigrants were no longer guests but foreigners.[170]

The change in policy orientation outlined by Kühn and Kohl was followed by a shift in the education policies. Like in the UK, assimilation was replaced by multiculturalism. Since the early 1980s the focus was no longer only on the immigrants' culture in the countries of origin but also on the development of immigration culture within Germany, thus stigmatization was avoided; mother tongue instruction was recommended not because of a possible return, but because of the significance attributed to bilingualism; the necessity of fluency in German - for decent prospects of professional occupation in Germany.[171] It should also be noted that from the introduction of multicultural ideas in German education, there was additional emphasis on racism, discrimination and inequality as obstacles which had to be diminished before inter-ethnic exchange could be achieved.[172]

On the national level, the Standing Conference of the Ministers of Education and Cultural Affairs started to formulate recommendations for improving a dialogue on ethnic,

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[168] ibid.
[169] Kohl, 1982, 46 in Gaebel, 8
[170] ibid.
[171] Sigrid Luchtenberg, "Challenges to multicultural education in the 21 century", (paper presented at the conference entitled *The Challenges of Immigration and Integration in the European Union and Australia, University of Sydney*, National Europe Center Paper No.82, 18020 February 2003), 10
[172] ibid., 3

cultural and religious issues in 1985. [173] The 1996 Conference defined intercultural education as a matter for both minorities and local populations. It proposed concrete measures to be undertaken by *Länder* authorities: to reflect the multilingual and multicultural background of minorities in curriculum and in teaching methods.[174] This can considered as a move towards active multiculturalism at least on paper.

Berlin was among the first federal states which responded to this new multicultural approach. Already in 1980 the Free University of West Berlin opened the first Institute of Intercultural Education (just a year after the launch of the Center for Multicultural Education in London).[175] It produced materials on multicultural education for schools and also introduced the projects with the aim to promote exchanges with institutions in other countries (e.g., the excursions and work camps for future teachers to countries such as Turkey, Nicaragua, Brazil).[176] The universities in other cities (e.g. Bremen, Frankfurt, Hamburg and Oldenburg) launched similar projects.[177] Given the federal structure of the education systems states were free to choose which approach to follow.[178] By the end of the century, multicultural approach was introduced in some of the 16 German states, mostly in states with high percentage of immigrant populations.[179]

In practice, however, active multicultural educational programs were developed only locally, unlike in the UK, since the education system in Germany was (and still is) decentralized. The popular method of funding in Germany at that time was (and still is) the *Modellversuche* (experimental models), the duration of which was usually up to 5 years. Funding could be provided by either the European community or federal government and

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[173] Schoenwaelder, Karen, "Integration policy and pluralism in a self-conscious country of immigration", in *The Multiculturalism Backlash: European discourses, policies and practices*, ed. Vertovec Steven and Wessendorf Susanne, 2010, 159
[174] ibid.
[175] Hoff, 828
[176] Ibid.
[177] Ibid.
[178] Gaebel, 11
[179] ibid.

states or/and the local community itself. Among the most famous examples were Krefelder and Mainzer models, which supported mother tongue teaching and national culture studies and created classroom curricula for the wide-ranging publication on multicultural education.[180]

The additional example is the community oriented project - the state organized centers for establishing cooperation with foreigners (*Regionale Arbeitsstelle fuer Auslaendearbeiter)*, which successfully promoted local initiatives on issues of racism, xenophobia, and ethnic diversity.[181] The outcomes of another project - the French German Youth Foundation - provided evidence that it was possible to get rid of age-old prejudices through long-term educational programs.[182] Notwithstanding the fact that the results in most cases were positive and schools were willing to implement these models, the *Modellversuche* were not further financed, due to the system of funding or to the lack of interest on behalf of local authorities.[183] Only a few projects became a part of ordinary school life.

The most successful large-scale example of progressive/active multiculturalism was the city of Frankfurt. Being an international economic center, this metropolis represents an extremely diverse society with the highest percentages of foreigners in Germany.[184] A special official department dealing with multicultural issues was created there with an intention of preventing intercultural conflicts.[185] There were many efforts to encourage political participation of ethnic minorities through mediatory activities between municipality and ethnic communities. As a result, Frankfurt has not seen any racist protests, and right-wing groups have not gained support.[186]

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[180] ibid., 832-33
[181] ibid.
[182] ibid.
[183] ibid.
[184] Eckardt, Frank. "Multiculturalism in Germnay: From Ideology to Pragmatism – and Back?", *National Identities Vol. 9, No. 3,* 2007, 240
[185] ibid., 241
[186] ibid.

However, due to the European directive of 1988 and UNESCO proposition of international education, the understanding of multicultural education was broadened to European and global perspective.[187] Thus, by the mid-1990s some federal states began moving away from multicultural programs which were focused on cultural diversity within the country to a more European and global standpoints which were concerned with Germany's identity within the European Union and in the world.[188] Teachers often preferred to reflect on issues of diversity in a distant country (like indigenous people in America), but not to pay attention to diversity in the German context.[189]

Furthermore, as in the UK, the most controversial topic within the German education system has always been religious instruction. According to the Constitution, religion is a compulsory subject and is taught based on the principle of 'religious groups'.[190] Since the 1980s Islamic groups strived for recognition, but failed. They did not qualify as 'religious groups' which should have a representative person as this was against the structural organization of Islamic communities.[191] Thus, only Catholic or Protestant Christian religious classes were supported by the government.[192] Yet parents could refuse to send their children to such classes, and then the alternative for them would be neutral subject Ethics. Nevertheless, a few schools started to offer optional courses on Islam in some states as an experiment already in the late 1990s.[193]

3.3. From the early 2000s to the Present Day: Back to Assimilation?

With the change in party composition of the government (the Social Democrat and Green Party coalition was elected in 1998), there were some important changes in

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[187] Lichtenberg, 2009, 3
[188] Faas
[189] ibid.
[190] Miera, 23
[191] ibid.
[192] ibid.
[193] Luchtenberg, 2003, 8

immigration-related legislation and consequently the country's immigration profile. In 2000, a new citizenship law based on *ius soli* principle was introduced.[194] For the first time in almost 90 years, immigrants' children born in Germany were now automatically granted German citizenship, if one parent has legally resided for at least eight years.[195] They are also allowed to have the citizenship of their parents, but must chose to be citizens of either Germany or another country by the age of 23.[196] In the same year, the government launched a "green card" system, which allows for legal residency up to five years for highly qualified professionals.[197] This marked the turn in recruitment from low to highly skilled labor. This change coincided with a demographic shift toward a more aging population.

In 2003, the number of immigrants reached 7.3 million - 8.9 % of the total population.[198] The largest share of immigrant population was still comprised by the former guest workers, notably from Turkey (e.g. Turkish citizens accounted for 1.9 million, including 654,000 who were born in Germany, but excluding half a million Turks who have been naturalized).[199] After the accession of 12 new countries to the EU in 2004 and 2007, the main source countries have become EU countries, and other western and eastern European countries (e.g. Norway, Switzerland, Russia, and Ukraine). Thus, like in the UK, the profile of immigration has become more diverse and temperate in its nature.

Following the changes of the late 1990s and early 2000s, immigrants' integration again became the dominant concern of education policy development. Multicultural education policies did not spread to a nation-wide phenomenon and the marginalization of immigrants was still a reality. This was additionally proven by the results of several studies, including the publication of the Programme for International Student Assessment (PISA) in 2003. The

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[194] Schoenwaelder, 159
[195] ibid.
[196] ibid.
[197] Oezcan
[198] ibid.
[199] ibid.

PISA studies revealed a higher correlation between social background of schoolchildren and their educational attainments in Germany than in other countries.[200]

The first attempt to address educational problems highlighted by PISA was undertaken during the "Integration Conference", which invited the representatives of the federal and states government and civil society organizations in 2006. Following this conference, the federal government issued its "National Integration Plan" that emphasized good German language skills as a prerequisite for educational success of migrant children.[201] It also suggested improving teacher qualifications and increasing the employment of teachers with a migrant background. However, it did not make any recommendations on curricular content and the accommodation of different cultures and religions.[202] Still, it did mention that integration should be based on "our cultural self-concept…, our liberal and democratic order, as it has developed from German and European history…"[203] This somewhat assimilationist stance can be attributed to the fact that the conservative party, the Christian Democratic Union, came to power. In 2010, Chancellor Angela Merkel officially declared the end of multiculturalism and asserted that immigrants have to do more for integration, including learning German.[204]

Consequently, the curriculum has incorporated the need both to influence the development of national identity and to promote democratic values. Within the subject History, textbooks address cultural diversity from German and European viewpoints.[205] The curricular guidelines of such subjects as Social Sciences stress the goal of raising children's awareness of social diversity. As for cultural and religious diversity, it is discussed mainly

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[200] OECD, "Where immigrants succeed. A comparative review of performance and engagement in PISA 2003", http://www.pisa.oecd.org/dataoecd/2/38/36664934.pdf

[201] Bundesregierung (Ed.), "Nationaler Integrationsplan: Neue Wege – Neue Chancen, (Bonn, 2007), http://www.bundesregierung.de/Content/DE/Artikel/2007/07/Anlage/2007-08-30-nationaler-integrationsplan,property=publicationFile.pdf

[202] ibid.

[203] ibid., 12

[204] BBC News, "Merkel says German multicultural society has failed", October 17, 2010, http://www.bbc.co.uk/news/world-europe-11559451

[205] Miera, 25

within the topic of human rights.[206] There are, however, a few exceptions of materials introduced by individual educators that actually deal with the heterogeneity of pupils' backgrounds in a coherent way.[207]

Even though the PISA results also underlined the deficiency of the German multi-track school system and the lack of teachers' competence to diagnose children's abilities, these issues have not received much consideration. The restructuring of the school system by providing equal opportunity for all children has not been a policy priority. For example, the elimination of *Hauptschule*, (which is today considered in some *Länder*) has been opposed by many native German parents who fear that this will lower the standards of other German schools.[208] Up to now, a positive development in regard to improving the educational achievements of pupils with migrant background has been the introduction of full-day schools, which gained financial support from the government since 2003.[209]

Since the PISA results showed that the school participation of pupils with migrant history was worse than that of native Germans, the integration policies have become highly focused on acquisition of German language.[210] Hence, all *Länder* have begun to use German language tests before school enrolment, in some cases denying access to school due to lack of language skills.[211] Berlin is the only state that requires the German test for all children regardless of their origin.[212] As a result, the responsibility for teaching German has been shifted to the educators and caregivers in kindergarten, despite the fact that they neither have a proper educational background nor enough time for this.[213] In schools compulsory German language courses have been put in place. Although some federal Ministers acknowledge the

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[206] ibid.
[207] ibid.
[208] ibid., 12
[209] Bundesministerium für Bildung und Forschung, "Deutschland braucht mehr und bessere schulische Angebote", 2007, http://www.ganztagsschulen.org/108.php
[210] OECD, "Where immigrants succeed. A comparative review of performance and engagement in PISA 2003"
[211] Miera, 21
[212] ibid.
[213] ibid.

significance of bilingual language competence, only pilot schemes have been developed so far, which are often terminated due to the lack of financial support.[214] Within the scheme of bilingual classes the priority is given to European languages (usually English). Some schools offer optional mother tongue classes (in most cases Turkish), while others schools offer them as foreign language courses.[215]

As for preparation of teachers, in most states intercultural/multicultural learning has not become compulsory.[216] Few universities have additional courses on multicultural education in postgraduate studies, with the exception of Hamburg where it is a part of undergraduate programs.[217] Some of these courses deal with teaching German, others with issues of right-wing extremism, mediation and conflict resolution. Yet courses on migration, values and needs of children with migrant background are less common.[218] Regarding the appointment of teachers, there are few teachers with a migrant history. The institutional discrimination in recruitment process has been obvious: according to the legal framework, teachers can be categorized as public servants only if they are German citizens.[219] Despite the changes in citizenship law, it is still hard for people with migrant history to get into teaching positions, especially for female Muslim teachers. The legal restriction of wearing headscarves excludes them from schools.[220]

Regarding the issues surrounding religious instructions in schools, the terrorist attacks of the early 2000s have not only increased the level of mistrust towards Muslims and consequently Islam, but also prompted urgent necessity to deal with these issues. Unlike the UK, where Muslims got the right to open state-funded schools, this has not been the case in Germany. The representation of Islam in schools is still highly opposed. Yet there has been

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[214] ibid, 22
[215] Luchtenberg, 2009, 4
[216] Luchtenberg, 2009, 6
[217] Miera, 25
[218] ibid., 25
[219] ibid., 26
[220] ibid., 25

some progress in finding a compromise. For example, the first German Islam Conference in 2006 achieved the agreement that Islam should be available in school. [221] As a result, some *Länder* launched pilot projects and even included teacher training in university programs (e.g. in Münster and Osnabrück).[222] Due to the fact that Islamic organizations are sometimes suspected in contradicting German Basic Law, these religious classes are often inspected by school administrators.[223]

To conclude, there have been several noteworthy shifts in the development of German education policies since the post-war period. The first shift happened when the separation policy was replaced by assimilationist one – *Ausländerpädagogik.* The second shift was the move towards multicultural position in the late 1970s prompted by alterations in migration situation and socio-political context. However, since education is a responsibility of regional authorities, active multicultural policies were implemented locally only by a few *Länder*, while other states embraced some form of passive multiculturalism or paid more attention to European and global aspects of diversity. Since 2000s the attention of policy-makers has shifted back towards more assimilationist measures which emphasize the acquisition of German language and the adoption of German values and way of life. Despite this new shift, multicultural education is still in place in many educational initiatives on the local level.

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[221] Luchtenberg, 5
[222] ibid.
[223] Miera, 25

Chapter 4: The Analysis of Education Policies in the UK and Germany

Having reviewed education policies in the UK and Germany, it is now possible to compare the development of multicultural education in these countries in order to see whether they show similar or divergent dynamics of multicultural education policies in a longer historical perspective. In order to make such an assessment, this chapter will analyze education policies using the four clusters of indicators (developed on the basis of the conceptual and theoretical framework in the first chapter). They are: 1) the adoption of curriculum that integrates the background of ethnic minority pupils in its content and promotes prejudice reduction; 2) teacher training on multicultural and anti-racist education and the recruitment of teachers with migrant background; 3) support for mother tongue teaching, bilingual educational programs and/or a national language acquisition; 4) support for the minority religions and the consideration for gender-specific practices and other sensitive issues to the values of ethnic minorities (e.g. exemption from dress codes).

Before proceeding to the comparison and analysis of education policies in the UK and Germany, it should be noted that the period from 1945 till the 1960s is treated as an introductory context. In the UK the education system did not take into account the integration problems of immigrants from former colonies. Similarly, in Germany the integration of ethnic Germans recruited from former German territories was not addressed. Only with the change of social context caused by newly arrived immigrants in the 1960s did the first attempts to deal with ethnic and cultural diversity emerge. Thus, the 1960s form a starting point in this analysis.

4.1. Adoption of Multiculturalism in School Curricula

The comparison of the curricula development in the UK and German since the 1960s reveals both similarities and differences. There have been similar broad shifts from one educational approach to another.

First, assimilation to the mainstream society was a dominant goal of schools' curricula in both the UK and Germany in the early 1960s and mid-1970s respectively. Yet additional funding for curricula development was not provided in either country. The choice of assimilation stance can be explained by the changes of social context in these countries. In the case of the UK, a series of violent riots in which white Britons attacked Black immigrants showed that the government should introduce stronger measures to facilitate immigrants' integration. Since the Conservative Party was in power at that time it is quite understandable that assimilation was specifically chosen as an immigrant integration policy. Additional funding was not provided in the UK since immigrant children were not distinguished from socially disadvantages pupils. In the case of Germany, the permanent settlement of guest workers forced the government to adopt more radical policies, even though this might not be expected due to the party composition of the government at that time, with the Social Democratic Party in the lead. The extra funding was not given since the government still claimed that Germany was not a country of immigration.

Secondly, an assimilationist approach was replaced by a multicultural one within school curricula by most local education authorities in the UK and by most of the 16 German federal states. The national governments of both countries not only proclaimed that teaching of different cultures and religions should be included in the curricula of such subjects as history, geography, current affairs, but also provided funds for the curricula development projects. The issues of diversity along with non-discrimination and antiracism became part of school curricula. In the UK, a strong opposition against assimilation from the side of liberal

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organizations and immigrant communities themselves forced the revision of integration policies. This change in the approach can also be attributed to some extent to the election of the Labor Party which applied more liberal principles. In Germany, the shift towards multiculturalism was a pragmatic rather than ideological choice. The marginalization of immigrants (especially Turkish communities) showed that *Ausländerpedagogik* was not effective in fostering integration.

Thirdly, it is possible to see certain parallels between the two countries in the development of their curricula since the beginning of the 21st century. During the last decade and a half the focus of such school subjects as history and social sciences has shifted towards the promotion of national identity and national values. In the UK the revised citizenship education is now preoccupied with building a unique British identity and creating community cohesion on the basis of British values which are in fact not exclusively British, but simply human values recognized by the United Nations. As in the UK, in Germany there has been a shift in the philosophy of the national recommendations which advocates the development of national identity and promotion of democratic values from German and European standpoints. In both the UK and Germany the reason behind this change has been primarily dictated by the increased security and identity concerns triggered by global terrorist attacks, which increased the level of mistrust towards ethnic minorities, especially, Muslim population.

As for the differences, the obvious one is the different time periods when the shifts in the development of education policies, including curricula, occurred. German policies have been developing with a time lag of a few years or even decades in comparison to the UK. For example, assimilationist approach was introduced to school curricula in Germany when multiculturalism was already a part of British curricula in the mid-1970s, or when Germany initially embraced multiculturalism, in the UK there was already an evident retreat from it in the late 1980s. This time difference can be explained by the divergences in immigration

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profiles: massive inflows of immigrants with linguistically, culturally, and religiously diverse backgrounds started to arrive to Germany only after 1961 - a decade and a half later than to the UK. It can also be attributed to changes in a leading party in these countries' governments.

Another difference is that Germany had a separation policy before the adoption of assimilationist approach. There was stress on learning history, mother tongue and culture of the immigrant countries of origin. The choice of this policy was dictated by a country-specific model of economic recruitment. There was an assumption that guest workers were staying temporally, so there was no need to educate them in the German education system, but rather to prepare for re-integration in their countries of origin.

The third difference accounts for the divergent ways of implementing changes in curricula. In contrast to Germany, multiculturalism in the UK was gradually introduced in curricula: first, there was limited influence of the changes on the education of the native British pupils, but later there was a significant impact on their education. Additionally, the UK had the periods of rise and fall in the development of multiculturalism within curricula. Under the Conservative Party multiculturalism was in an evident retreat, but with the election of the Labor Party at the late 1990s it was back in the curriculum. This difference is due to the fact that in the UK the changes in party composition of the government have greater influence on the development of education policies than in Germany because the British education system is more centralized.

In the case of Germany the changes in curricula have been happening mainly locally, despite federal level recommendations. Unlike in the UK, in Germany even the federal states that introduced multiculturalism in their curricula did not implement it in the same way. Due to the broader concept of multiculturalism in Germany, some schools have focused more on local diversity, while others preferred to deal with European and global dimensions of diversity. This can be explained by the fact that in Germany education has always been solely

the responsibility of local authorities, while in the UK local authorities have been less independent, especially after the adoption of the National curriculum, the changes of which they have to follow.

4.2. Mother Tongue, Bilinguism and National Language Acquisition

Unlike the case of curricula development, more differences than similarities can be distinguished between the two countries' approaches to language teaching.

The broad directions of shifts in attitudes towards language support have been similar in both countries. First commonality accounts for the similar approaches towards national language acquisition during assimilationist period. Both in the UK (in the early 1960s) and in Germany (in the mid-1970s), the recommendations of their national agencies strongly emphasized the importance of national language acquisition. Extra language courses became a part of primary and secondary education. This similarity is due to the fact that in both countries there was an urgent need to integrate the growing immigrant population.

Another similarity is a switch of policy orientation from assimilation to multiculturalism on the national level which led to introduction of bilingual programs and mother tongue teaching in both countries. In the UK this was prompted by the increase of linguistic diversity within British society and increased demands for cultural recognition from minorities. In the case of Germany, the increased marginalization of immigrants was a clear sign of failure to integrate them through assimilation. Additionally, this more liberal approach could be expected in the light of party composition of both the British and German governments.

The third similarity refers to the priority of national language acquisition in both the UK and Germany since the 2000s. In the UK, there has not been any official support of mother tongue education, though there has been increase in the budget for English language

training. In Germany migrants get extra support for learning German. There is no coordinated bilingual education in either country; those bilingual classes that exist are usually focused on European languages (mainly, English and French). Surprisingly, migrant bilinguism has not been highly valued in these countries despite the fact that multilingual competence is actually recommended by the national governments and is generally in high esteem in the European Union. The stress on national language acquisition in both countries can be explained by the fact that migrants' low academic achievements are often attributed to their lack of national language skills, while discrimination and inequalities have not been questioned so far.

One of the most significant differences was the introduction of mother tongue teaching at much earlier stage in Germany than in the UK. As already pointed out, maintaining immigrants' native language in German school was a preparation for return to the countries of origin. This difference between two countries is obvious given the variances in immigration profiles: in the UK first immigrants after WWII mostly came from former colonies and spoke English as a mother tongue, so these was no need for mother tongue teaching, while in Germany guest workers came from a variety of non-German speaking countries.

Despite similar recommendations for mother tongue teaching on the national level in both countries, there have been significant differences in the way they have implemented these recommendations. In the UK, during the period of active multiculturalism mother tongue lessons became a part of school curricula, even though in most cases they were still considered as an alternative to the modern European languages and were offered mainly in secondary schools, while ethnic minorities insisted on conducting these lessons in primary schools.

Unlike the UK, in Germany, mother tongue teaching and bilingual projects have always been a matter for individual schools. For example, when the guest worker model was abandoned, teaching of mother tongue was still carried on along with German language

courses in some schools. Currently some German schools offer mother tongue lessons as optional courses, others provide them as a substitute for foreign language courses. In general, mother tongue teaching is in place today in many regions with high percentages of immigrant populations. This difference between the countries can be accounted for the independence of federal states in developing their own educational programs. Additionally, this can be explained by differences in methods of financing the education of immigrant pupils, including language teaching. In the UK, the grants are provided by the national government according to the National Government Acts, while the popular way of funding the educational projects in Germany has been so-called Modellversuche (experimental models), with grants given by the European Community, federal government, federal states or even community (city/town) itself.

4.3. Religious Education

Unlike the changes in curricula and language instructions, attitudes towards religious education have been broadly similar in both the UK and Germany. The major similarity is that religious education which is non-proselytizing in its nature has always been a legally compulsory subject in schools in both countries. This legal obligation is based on the assumption that moral education should have a religious background.

Another similarity is the opportunity to opt out off religious education classes. Despite legal regulation, in practice parents or children themselves from the age of 14 can request withdrawal if they do not belong to the mainstream religion. In Germany, in the case of withdrawal children must attend a neutral course in "Ethics" or "Philosophy" instead. This is most probably done with the intention to avoid conflicts in both countries.

The third commonality is the dominance of Christianity within public schools of both countries, even though religious education classes can deal with other faiths. This can be

explained by the fact that Christian religious groups have been most numerous in these countries throughout most of their historical past.

The fourth resemblance between the countries is the lack of support for separate religious schools before the 1990s. In the UK, in contrast to 100% financial support for Christian and Jewish schools, Muslim and Sikh demands for separate religious teaching were not addressed in the 1980s. Similarly, only Catholic, Protestant and Jewish schools were, and still are, supported financially by the German government, while Muslim groups' demands were rejected. In the UK, the official rejection was probably based on public hostility towards new religious demands. Additionally, there was no clear content of mainstream religious education in schools of that period, but the provision for minorities' religious education would have meant a more clear definition of religious education, and this might have caused conflicts between different interests groups and the British government.

In Germany, the formal reason for refusal was the failure to correspond to the legal principle of "religious groups" which have a representative person, contrary to the institutional organization of Islamic groups. There was also an assumption at that period that Islamic communities, as the immigrants in general, would stay only temporally, so they were not corresponding to the criteria of being a constant religious group. Moreover, they were, and still are, often suspected for noncompliance to the German Basic Law. This lack of support is predictable given the leading party composition of the government in both countries at that time (the Conservative Party in the UK and Christian Democratic Union in Germany).

Furthermore, these days the introduction of Islam along with other religions within school education is unresolved issue in both countries. In the case of the UK, even though religious education in schools deal with a variety of faiths, the legislation still underscores that the content should include more Christianity than other faiths. In Germany, Islamic

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organizations are still suspected in contradicting to German Basic Law; that is why even those few existing experimental courses on Islam are often investigated by the authorities. This similarity is mainly due to the increased security and identity concerns which were triggered by the terrorist attacks in the early-2000s. These tendencies can be additionally attributed to the election of conservative parties in both countries.

As for the differences, in contrast to Germany, some consideration for the specific issues important for minorities' religious values was embraced in Britain since the mid-1960s. For instance, religious clothing was allowed if it corresponded to the colors of school uniform, or vegetarian and halal lunches were served in school canteens. In the early 1970s there was even a move away from a "dogmatic" approach in teaching religious education. Moreover, after the Race Relations Act of 1976 exemptions from dress code were granted in British schools (e.g., the hijab was allowed). In Germany these sensitive issues were not addressed to the same extent as in the UK. Though headscarves are not forbidden, Muslim schoolgirls are discouraged from wearing them by their classmates and even teachers.

Another divergence between these countries is that there has been a breakthrough in the British attitude towards other faiths, while this has not yet happened in Germany. Since the late-1990s followers of Muslim and other religions in the UK have been given the right to establish state-funded religious schools. In contrast, in Germany, there has only been a little progress in recognizing the need to make other religions (mainly Islam) besides Catholic, Protestant and Judaism available in schools. This progress has been primarily localized in the cities with high percentage of Turkish population. Only a few schools have introduced classes on Islam as an experiment so far. These developments have been mostly prompted by the growing Muslim population.

Both differences can be explained by the different party compositions of their governments. While in the UK the changes in religious education were mainly introduced

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under the Labor Party which is generally supportive for ethnic and religious diversity, in Germany most of the time the Christian Democratic Union was in power, which is known for its conservative stance towards religious diversity.

4.4. Training and Recruitment of Teachers

The comparison of the policies related to the preparation and recruitment of teachers in the UK and Germany reveals several similar developments along with minor differences. First of all, at the moment of immigrants' arrival neither British nor German teachers could facilitate knowledge construction of the immigrants' backgrounds. In the UK teachers were often influenced by their prejudices and paid little or no attention towards racism, which was not considered as a matter of school education. In Germany educators did teach the cultures of immigrants' countries of origin, but, as mentioned earlier, this was often a static understanding of culture, resulting in reinforcing stereotypes and prejudices. This can be explained that in both countries teachers simply lacked sufficient knowledge due to the absence of training. In Germany this was also due to the uncertainty concerning the immigrants' length of stay.

The second commonality is the similar problems that teachers in both countries faced when assimilation became the goal of education. Teachers were not provided proper guidelines for teaching national language. In the UK such trainings and seminars appeared only in the mid-1960s, and in Germany - in the late 1970s. The lack of guidelines immediately after the arrival of immigrants could be easily explained by the fact that the adoption of any official recommendations usually takes some time.

Another similar development can be seen when the ideas of multiculturalism became dominant in both British and German schools. The recommendations on the national level stressed the need to prepare teachers to better understand the language and cultural difficulties

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of immigrant pupils and to recruit teachers with migrant background. In the UK teachers got training not only on how to teach English as a second language, but also how to address issues of prejudice, discrimination and low performance of immigrant children. In Germany similar seminars and trainings took place. Universities and colleges of both countries started to include courses on multicultural education in their teacher education programs.

Yet a few differences can be highlighted from that time. In Germany trainings on multicultural education did not become a nation-wide phenomenon. In the UK with the election of Conservative party in the late 1980-s teacher courses on multiculturalism slowly disappeared and were only reintroduced with the change of government composition to the Labor Party in the late-1990s. These fluctuations within and between the countries can be understood against the background of the educational systems: British educational system is dependent on central government while the German one is not.

Furthermore, recently there have been   analogous developments of teacher training in both countries. Courses on multicultural/intercultural education have not become obligatory in the teacher education programs. The funding for those previously introduced courses was significantly cut by the government. In the UK several websites were launched for helping teachers to exchange information and experience regarding issues of diversity, but there are only a few live seminars for teachers. In Germany most training sessions are concerned with topics of prevention of right-wing extremism and facilitation of conflict resolution, while seminars on problems and interests of immigrant children are less popular. This has been happening against the shift in the curriculum development towards acquisition of national language and values. Similar to the explanation of changes within curricula, this can be attributed to the similar changes in political and social context of these countries.

With regard to the appointment of teachers with a migrant background, there have been both differences and similarities between the countries. In contrast to Germany, British

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schools hired thousands of teachers from abroad (mostly from New Commonwealth countries) in the early 1980s, then in late 1990s and early 2000s. This variance is explained by the difference in immigrant-related legislation of these countries. According to British Nationality Act all citizens of Commonwealth countries can legally reside and work in the UK. In Germany teachers must be citizens of the country, that is why applicants have to go through a complicated naturalization process before they can become teachers.

Today the proportion of teachers with a migrant background is very low in both countries. Foreign qualifications are not recognized as equal to that of German or British qualifications and teachers from abroad often do not work according to their qualification, usually they are hired to teach their native language or they have to go through additional training. The need for teachers is satisfied by those coming from other EU states. This is due to the EU enlargement and consequent priority given to the EU citizens.

Moreover, the recruitment process is highly discriminatory in both countries. In Germany, despite changes in citizenship law, it remained problematic for Muslim applicants to get citizenship and consequently it is still challenging for them to get teaching positions. This is especially hard for female Muslims who are prohibited by German law from wearing headscarves. Even though in the UK these gender specific practices are still decided on an individual basis, in most cases teachers are also not allowed to wear headscarves since they are considered to hinder the successful interaction between a teacher and pupils. These recent trends in regard to recruitment of Muslims are mainly due to the increased level of public mistrust and prejudices towards them.

Thus, the comparison and analysis of education policies development in the UK and Germany over more than five decades reveals that there have been more similarities than differences between these countries. The similarities account for the parallel shifts in education approaches (from assimilationist towards multicultural and back to somewhat

assimilationist) which has been accordingly reflected in the development of curricula, language instructions, religious education and teacher training and recruitment. Yet there have been a number of differences in implementing education policies which can be attributed mainly to the divergences in immigration profiles, citizenship legislations, education systems, political party changes and unique social context of these countries. Currently, multiculturalism is in retreat on the national level, but not throughout the whole country either in the UK or Germany. Overall, it is possible to conclude that the curve of multicultural policy development over time has been similarly shaped in both countries even considering all the differences.

Conclusion

Drawing on the comparative analysis of multicultural education policies in the United Kingdom and Germany since the 1960s, this thesis has sought to contribute to the debate about the retreat from multiculturalism and the question of convergence or divergence of integration policies. Even though there have been several divergences in the way of implementing multicultural policies, the analysis shows that the curve of multicultural policies development has been similar in both countries.

The convergence is seen in the broad parallel shifts in education approaches - from assimilationist towards multicultural and back to somewhat assimilationist. These shifts can be observed in the development of four main indicators of multicultural education: curricula, language instructions, religious education, teacher training and recruitment. With the change from assimilation towards multiculturalism, most schools of both countries introduced cultural and religious diversity in the curricula, mother tongue teaching and bilingual programs, recruitment of teachers with a migrant background and teacher training on issues of diversity, prejudice, and discrimination. Since the 2000s, education approaches in both countries have shifted towards the promotion of national identity. Within their curricula and teacher training they emphasized the importance of the national language acquisition. Seminars on multicultural education have almost disappeared. The proportions of teachers with a migrant background have declined due to the discriminatory process of recruitment. In regard to religious education, it has been a compulsory subject with priority given to Christianity in comparison with other faiths. Despite the retreat from the official support of multiculturalism at the national level, multicultural education policies have still remained the part of compulsory schooling in both the UK and Germany, though primary at the local level.

Yet some divergences are attributed to the implementation of education policies in the light of differences in the immigration profiles, citizenship legislations, education systems,

political party changes and unique social context of these countries. The shifts in education approaches in Germany have been happening with a time lag of a few year or even decades in comparison to the UK. Contrary to the UK, German multicultural policies developments have never become nation-wide phenomena given the federalist structure of education system. As for the UK, it introduced multiculturalism gradually and experienced the periods of rise and fall in the development of multicultural policies within curricula, religion education, mother tongue support, training and recruitment of teachers. In contrast to Germany, the UK made a breakthrough by allowing followers of Islam and other religions to establish state-funded schools. Moreover, the UK has introduced some consideration for the issues sensitive to ethnic minorities.

Thus, the findings within this long-term perspective on the development of educational policies reveal that the convergent trends overweigh the divergent ones. Despite the noteworthy differences in the implementation of education policies, the two countries have exhibited similar dynamics in the development of multicultural education over more than five decades. This provides evidence in support of the position of Christian Joppke who sees parallel shift in recent development. Yet it is too early to claim the retreat from multiculturalism which is still present at least at the local level in the field of education policies of two European countries that receive the highest numbers of immigrants. In this regard, it is possible to support Kymlicka's argument that there has not been a wholesome retreat from multiculturalism.

Considering education as one of the most important areas which influence immigrants' integration, it can be concluded that the evidence of education policies convergence of two big countries with the high percentages of immigrants sheds some light on the general debate about the direction of integration policies across Europe. Yet due to the lack of possibility to observe practicing teachers' pedagogy or student response to the social studies curricula, it

was impossible to track whether there has been discrepancy between policies on paper and their implementation. The future studies might address these issues by conducting field research. The space of this thesis did not also allow me to analyze the wide range of policies labeled as multicultural. That is why further research should be devoted to the development of multicultural policies in other spheres. Moreover, other countries should be researched in order to provide additional evidence for identifying the bigger trend with the respect to the multicultural policies development across Europe.

Appendices

Diagram 1: The UK School System

UK SCHOOL SYSTEM IN YEAR GROUPINGS

Age	England & Wales	Northern Ireland	Scotland
3	Nursery (non-compulsory)	Nursery (non-compulsory)	Nursery (non compulsory)
4-5	**Primary - Key Stage 1** Reception class	**Primary - Key Stage 1** Year 1	Nursery (non-compulsory)
5-6	Year 1	Year 2	**Primary** P1
6-7	Year 2	Year 3	P2
7-8	**Key Stage 2** Year 3	**Key Stage 2** Year 4	P3
8-9	Year 4	Year 5	P4
9-10	Year 5	Year 6	P5
10-11	Year 6	Year 7	P6
11-12	**Secondary - Key Stage 3** Year 7	**Secondary - Key Stage 3** Year 8	P7
12-13	Year 8	Year 9	**Secondary** S 1
13-14	Year 9	Year 10	S2
14-15	**Key Stage 4** Year 10	**Key Stage 4** Year 11	S3
15-16	Year 11	Year 12	S4
END	**OF**	**COMPULSORY**	**SCHOOLING**
16-17	Year 12 (Lower Sixth)	Year 13	S5
17-18	Year 13 (Upper Sixth)	Year 14	S6

Source: http://www.britishcouncil.org/ (accessed May 10, 2013).

Diagram 2: German School System
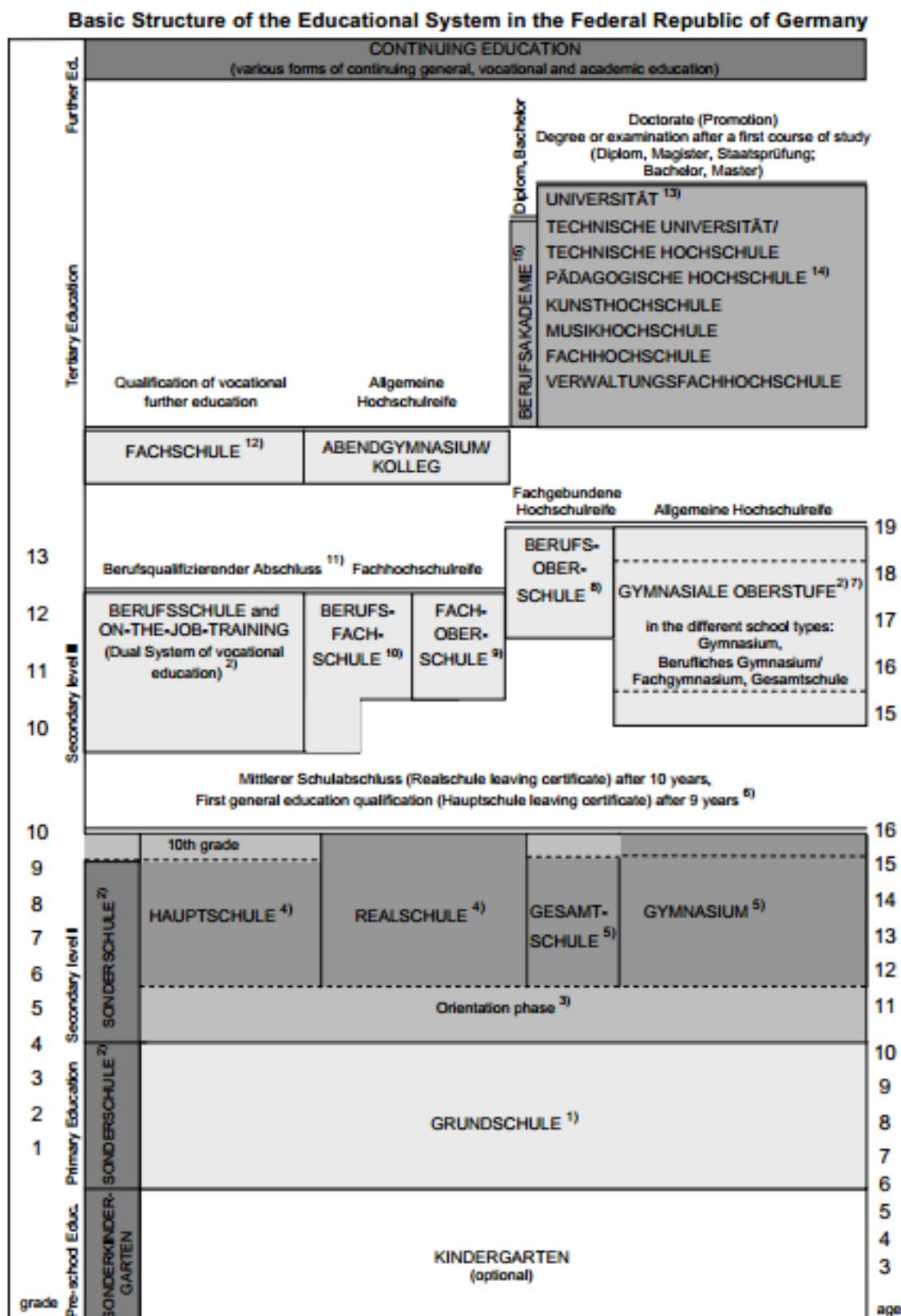
Basic Structure of the Educational System in the Federal Republic of Germany

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