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Religious education in a public school between religious particularism and general education. Comparative analysis

Abstract: The basic determinant of a public school as a social and educational environment should be the promotion of social inclusion and cohesion. In most countries of the European Union, religion is a subject of school education. They adopt different models in terms of legal legitimacy, organisation and curriculum. This article presents a comparative analysis of religious education in public schools from the perspective of the relationship between religious particularism and general education. In doing so, I assume that in different countries both religious particularism and general education may be defined differently in the context of school education. In Poland, religious education at school is optional. Currently, there is an idea of introducing religion (or ethics) as a compulsory subject. Non-public schools, i.e. a school run by social, religious or private entities, have the right to implement special curricular solutions. A public school, i.e. a school free of charge and available to every student, regardless of their worldview, should conduct religious education in the spirit of dialogue and social cohesion as an element of general education.

Keywords: comparative pedagogy, religious pedagogy, religious education in school, general education.

Introduction

From the historical perspective, religious education has formed an essential part of school education. In the past, it had a primarily confessional profile and served to convey the religious doctrine and anchor the student in a community of faith. It should be remembered that, in principle, schools were directly connected to the dominant religious traditions. The Reformation and then the Enlightenment provided the first impulses to a slow emancipation of the school system. With liberal-republican exceptions, the school system for centuries reflected the alliance of the altar and the throne. Religious education at school (I use the terms religion, religious education and religious instruction interchangeably when referring to school) served not only the intergenerational transmission of religious traditions, but also upbringing for participation in public life. In religious states, the content of humanities and social sciences curricula was saturated with religious elements. In this sense, religious education was involved in the implementation of the tasks of general education, as it was understood at the time. However, the fact is that religion, education and pedagogy are historically intertwined. This connection is pedagogical, philosophical, theological, social, cultural and political in its nature (Schweitzer, 2003).

Comparative education is one of the oldest pedagogical disciplines. From the very beginning, It was not only concerned with the comparative study of educational institutions and pedagogical ideas, but also with the typology of social consciousness, analysis of cultural and political currents, i.e. with everything that can influence the shape of education. Therefore, comparative education addresses a broad spectrum of educational issues and has a problem-based character. A simple comparison of institutional arrangements for schooling is only the vestibule of comparative education. R. Nowakowska-Siuta states: 'Comparative research serves as a multifaceted, contextualised analysis of not only education systems, as the subdiscipline was traditionally portrayed, but also of paradigms, philosophical and political discourses present in education, its history, and socio-cultural phenomena. Comparative analyses make it possible to describe not only 'how it is?' but also 'why it is as it is?', to understand the manners in which education is entangled in social, cultural, economic and political dependencies located in the logic of past events' (Nowakowska-Siuta, 2023, p. 53-54).

In the religious pedagogy, comparative education studies have their own history. According to F. Schweitzer, they were initiated at the beginning of the 20th century. In 1913, G.A. Coe in his encyclopaedic article 'Religious Education' compared the experience of religious education in different European countries. In Germany, in 1930, O. Eberhard published a monograph titled 'Welteerziehungsbewegung' on comparative analysis towards value upbringing. Contemporary comparative studies within the religious pedagogy include not only the comparison of religious education arrangements in different countries, but variations between different types of religiosity, forms of spirituality beyond traditional religious denominations, the study of ethics as well. Comparativism thus encompasses many fields of study: pedagogy, theology, religious studies, history, sociology, economics, law (Schweitzer, 2016, p. 15-18). It should be noted that Schweitzer is also the co-author of a classic monograph comparing the multifaceted development of religious education theory in the USA and Germany (Osmer & Schweitzer, 2003).

Religious education has also been addressed by the Council of Europe and other international institutions. They grant the states autonomy to choose their organisational form and teaching model in this area, and advocate for open, diverse and tolerant education at the same time. In 2007, the Office for Democratic Institutions and Human Rights (ODIHR) published a monograph on guidelines and good practices in regard to religious practices and tolerance in schools (ODIHR 2007). In the field of international cooperation and comparativism, numerous international organisations and practical projects have been established. The development of comparativism gains the utmost importance in the discourse at the national level, which allows the latter to include issues beyond the particular interests (Jackson, 2014).

In this article, I am not able to present the historical processes which explain the status of religious instruction at school in different EU countries. However, I shall try to reconstruct the spectrum of contemporary solutions in this respect and one selected cultural and social process that appears to me to characterise – to a greater or lesser extent – the situation in most European countries, namely secularisation. In this context, I will engage in the discussion on the model of religious instruction within public education in Poland. The discussion will focus on the issue of providing religious education at school with the status of a compulsory subject. This is in fact the case in many European Union countries. However, it requires to revise not only the curricular concept, but also the understanding of the sense of religious instruction provided within the public school system. The determinant of religious education in a public school should be the balance between religious particularism and the modern understanding of general education.

European Union: religion at school

In all European Union (EU) countries, religion is a subject of education provided within the public school system. The only exception is France with its own liberal-republican and colonial tradition. However, there are also exceptions within the French Republic due to the special status granted to the Alsace and Moselle regions. In the rest of the EU countries, religion is taught as part of the school system.

The issue of religious education and socialisation in a broad sense, in different religious, social and cultural settings is the subject of religious pedagogy (Domsgen, 2019; Marek 2022; Marek and Walulik 2020; Nipkow 1990). On its basis, standard studies on the comparative teaching of religion as a subject in school education have been prepared (Kuyk and Jensen et. al., 2007; Rothgangel, Jackson and Jäggle, 2014; Rothgangel, Skeie and Jäggle, 2014; Rothgangel, Jäggle and Schlag, 2016; Rothgangel, Danilovich and Jäggle, 2020; Rothgangel, Aslan and Jäggle, 2020; Rothgangel, Mechenmacher and Jäggle, 2020).

In Europe, the implementation of religious education in schools follows different rules. Below I will present a matrix of solutions. The conjunction 'or' used in the statements does not imply a disjunctive alternative, but rather points to opposite poles in an idealised manner. In specific cases, we may observe the integration of selected elements of the alternative solutions.

1) Religion in school may have different legal framework.

An example of a European country, which makes religious education in public schools compulsory at the constitutional level is Germany. The Constitution of the Federal Republic of Germany (1949) states: 'Religious instruction shall form part of the regular curriculum in state schools, with the exception of non-denominational schools. Without prejudice to the state's right of supervision, religious instruction shall be given in accordance with the tenets of the religious community concerned. Teachers may not be obliged against their will to give religious instruction.' (Article 7(3)).

In Poland, religious instruction in school is also established on a constitutional basis, but to a lesser extent in comparison to Germany. The Polish Constitution contains the particle 'may' – religion may be taught at school. Article 53(3) and (4) of the Constitution of the Republic of Poland of 2nd April, 1997 states: '3. Parents shall have the right to ensure their children a moral and religious upbringing and teaching in accordance with their convictions (...). 4.The religion of a church or other legally recognised religious organisation may be taught in schools, but other peoples' freedom of religion and conscience shall not be infringed thereby' (*Journal of Laws of* *1997, No. 78*, item 483). In comparative terms – against the background of many other countries – this is still an important constitutional guarantee.

Among the members of the European Union there are also such democratic, pluralist states, which give privileged status to their dominant religious tradition, the so-called 'Church of the Nation', e.g. Denmark or, until 2000, Sweden. However, the societies of these countries are secularised and sensitive to the rights of those with a different worldview. In this context, Greece is an interesting case, with a society strongly attached to its own religious tradition. The Constitution of Greece of 9 June, 1975 begins with the preamble: 'In the name of the Holy and Consubstantial and Indivisible Trinity' (text of the Constitution: libr.sejm.gov.pl). It states that: 'The prevailing religion in Greece is that of the Eastern Orthodox Church of Christ' (Article 3(1)). At the same time, the Constitution recognises social pluralism, civil liberties and guarantees freedom of conscience, regardless of religious belief (Article 13). On education, it states the following: 'Education constitutes a basic mission for the State and shall aim at the moral, intellectual, professional and physical training of Greeks, the development of national and religious consciousness and at their formation as free and responsible citizens' (Article 16(2)).

The education act and regulations on religious education remain faithful to the spirit of the above provision. Nevertheless, the Constitution of Greece does not speak directly about the teaching of religion in school itself (Mitropoulou, 2020, p. 59-63).

Italy, as a state traditionally associated with Catholicism, guarantees the equality of all religions in its Constitution and does not address the matter of religious education. This issue is the subject of the concordat and agreements between the State and the recognised Churches and religious associations. It should be kept in mind that the original form of the concordat were the so-called Lateran Pacts of 1929. The concordat currently in force was adopted in 1984. While religious instruction was compulsory and confessional in the Lateran Pacts, the 1984 concordat changed its character to optional. Religious instruction has maintained its confessional character and at the same time has been linked to the performance of school educational tasks (Misiaszek, 2010, p. 70; Alber and Rechenmacher, 2020, p. 88-91).

In Spain, yet another country historically associated with the Catholic tradition, the Constitution of 27 December, 1978 does not speak directly about religious instruction in school (text of the Constitution: library.sejm. gov.pl). Article 27(2) and (3) merely state that: '(2) Education shall aim at the full development of human personality with due respect for the democratic

principles of coexistence and for basic rights and freedoms. (3) The public authorities guarantee the right of parents to ensure that their children receive religious and moral instruction in accordance with their own convictions' The Constitution does not address the ways in which the guarantee of religious and moral upbringing is implemented. Such matter are governed by the concordat and the education law (Garcés, 2020, p. 165-171)

In a democratic state, the strongest regulations are those regulations at the constitutional level. Other forms of legal legitimacy for religious instruction are: concordats as forms of international agreements, acts on the relation of the State to particular Churches and religious associations, agreements between the State and Churches and religious associations, education acts and specific executive acts. In the EU, one may observe an entire spectrum of solutions, which does not change the fact that religion remains a subject of school education. In the face of the multiplicity of legal solutions, the challenge is to conceive a structure, which would create a balance between the requirements of a democratic and pluralistic state of law and the legitimate claims of religions to propagate their beliefs in the public space (Zieliński, 2020), also within school education (Milerski and Zieliński, 2022).

2) Religion may be taught as a compulsory or optional subject.

The subject of religion alone may be compulsory, without the possibility to choose an alternative subject, e.g. ethics, philosophy, etc. compulsory character can also be a subject block: religion (for students who identify with a particular religious tradition) and an alternative subject (for students opting out of confessional religious education).

With religion as a compulsory subject, without the possibility to choose an alternative, religious education takes the form of knowledge about religions and the exchange of experiences related to different religious perspectives of understanding and valuing the world (Sweden). Sometimes religion as a compulsory subject of a supra-confessional nature is introduced at a specific stage of education and supplements confessional religious education (some cantons in Switzerland).

If the subject block is compulsory (religion vs. ethics), we can opt out of religion and choose an alternative subject (the so-called negative choice – the pupil opts out of religion in favour of the alternative subject). This is the most common solution in most countries.

In the case of optional nature of the subject block (religion vs. ethics), we can choose religion, choose an alternative subject or choose neither of these subjects (the so-called positive choice – the student enrols in religious education or an alternative subject). The obligatory character of the teaching of religion or the subject block religion vs. ethics (alternative subject) is in place in countries such as: Austria, Belgium, Bulgaria, Denmark, Estonia, Finland, Germany, Greece, Ireland, Lithuania, Norway, Romania, Sweden, Switzerland, the United Kingdom.

Religion as an additional optional subject (without the requirement to choose an alternative subject) is in force in countries such as: Czech Republic, Hungary, Italy, Latvia, the Netherlands, Poland, Slovakia, Spain.

3) Religion may be taught as a confessional or supra-confessional subject.

Supra-confessional religious education is implemented, among others, in: Estonia and Sweden, and from the EU-associated countries, in Norway.

Confessional religious education is provided in most other European countries: Austria, Belgium, Bulgaria, the Czech Republic, Denmark, Estonia, Finland, Germany, Greece, Hungary, Ireland, Italy, Lithuania, Poland, Romania, Slovakia, Scotland, Spain, Switzerland, as well as in some schools in England and Wales and the Netherlands.

In both cases, religion can be taught in accordance with various models at different levels of education, e.g. at primary level as confessional teaching and at secondary level as supra-confessional teaching (e.g. Denmark). In a given country, there may also be both types, meaning that some schools have confessional teaching and some have supra-confessional teaching, based on the authority in charge of the school, especially when the state delegates the management of schools to educational associations (e.g. the Netherlands) or delegates competences of the nature of religious education to local or regional school supervisory boards (e.g. England and Wales).

4) Religion may be taught in accordance with different teaching models.

In the case of confessional teaching, this can be an open model, focused on a dialogue with other faiths and the world from the perspective of one's own denomination, or a catechetical and apologetic model, focused on taking strong root in one's own religious community with its doctrine, worship, ethos and social teachings. In the case of supra-confessional teaching, this can be a religious studies model with principal focus on dominant tradition(s) or a religious studies model highlighting the exchange of experiences from the perspective of different forms of religiosity.

5) Religion may be taught as a subject with different curricular scope.

The teaching of religion may focus mainly on religious phenomena. It might also encompass – especially in the case of the aforementioned open and dialogical confessional teaching model or the supra-confessional model - the whole spectrum of not only religious phenomena, but also existential, social, cultural, historical and political phenomena analysed from the perspective of religion.

6) Religion may be taught as a subject with different decision-making centres.

Religious education may be organised by educational authorities in cooperation with Churches and religious associations or by Churches and religious associations in cooperation with educational authorities (e.g. different solutions in individual German states). In both cases, the nature of the cooperation can vary – it may involve curricular, organisational and teaching matter, or only the latter two with the exclusion of the creation of curricula.

Religion could also be taught as a subject not administered 'arbitrarily' by the educational authorities or Churches, but by grassroot community associations running the schools, being (a large proportion of schools in the Netherlands).

Poland: religion in school

In the context of the outlined matrix of solutions adopted in the countries of the European Union, I will now present the fundamental principles which currently define religious education in Polish schools.

In our country, religion has been an important element of collective identity. For the moment, I leave aside its historical context, especially the role of religion during the Partitions, the Second Republic and World War II.

The fight against religion began after 1945 with the establishment of the communist system. In a nutshell: events such as the rearrangement of the Polish borders (loss of the eastern territories and incorporation of the post-German territories on the western side), deportations and migrations of the population, unification policies, the policy of erasing cultural differences and the establishment of a socialist order were to result in the creation of a new society and a new cultural foundation. Moreover, as a result of the actions by the German Nazis, the culmination of which was the Holocaust, the Jewish population was reduced to a small diaspora. I do not elaborate here on the complex and multi-dimensional Polish-Jewish relations. As a result of the change of the borders and resettlement of population, the number of Eastern Orthodox and Protestant believers radically decreased as well. The communists wanted to make Poland a homogeneous state.

In this context, the activities of the Catholic Church became a cultural and social alternative to the domination of the communist system. On the one hand, the fact that there existed certain internal fractions within the Catholic Church which advocated for an agreement with the communists is well known; on the other hand, we are aware of the aspirations of the political authorities to treat the Catholic Church, as well as minority Churches and religious associations, in an instrumental manner. These phenomena did not generally undermine the positive perception of the social role of the Catholic Church as the guarantee of cultural continuity. For this reason, 'Solidarność' [en. Solidarity] as a trade union and a freedom movement, partly created by left-wing activists, became closer to the Catholic Church, and the Church gave it its support. From the political perspective, this was a stimulus for the re-establishment of the 'throne and altar' alliance we observe in contemporary Poland.

The elimination of religion from the school system was of a sinusoidal character and did not take place at a single point in time. Paradoxically, the final turning point was not the year 1945, as in the end of World War II together with the incorporation of Poland into the communist bloc. More radical measures were only implemented in 1948. From this point onwards began the real and extensively planned removal of religion from schools. However, there were brief periods, such as in 1956, after W. Gomułka assumed political power, in which religious instruction in school was reinstated. It was not until the adoption of the Act on the Development of the Education and Education System (*Journal of Laws 1961, No. 32*, item 160) in 1961 that the entirely secular character of public education was imposed (Article 2 of the Act) and, consequently, religious instruction was finally removed from the school system.

With the political and system transformation in Poland, religious education once again resurfaced as a subject of school education. The change took place in 1990 on the basis of an instruction issued by the then minister responsible for education and upbringing. At the time, the decision sparked considerable public and legal controversy. The legal status of 'instruction' was put in question. In 1991, the Parliament passed a new progressive act on the education system, which legalised religious instruction in school and delegated the authority to issue the legal act in the form of a regulation to the minister. The Education System Act states: 'Public pre-schools and primary schools organise religious instruction at the request of either the parents or the pupils themselves; after reaching the age of majority, the participation in religious instruction and upbringing in consultation with the authorities of the Catholic Church and the Polish Autocephalous Orthodox Church and other Churches and religious associations shall specify, by means of a regulation, the conditions and manner in which schools shall perform the tasks referred to in section 1' (*Journal of Laws of 1991, No. 95*, item 425, as amended; I take into account later amendments concerning pre-schools).

In 1992, the Regulation of the Minister of National Education of 14 April 1992 on the conditions and ways of organising religious education in public pre-schools and schools was published (*Journal of Laws of 1992*, *No. 36*, item 155). The regulation was subsequently amended several times (consolidated text: Journal of Laws of 2020, item 983). However, the essence of the regulation has remained unchanged. The basic provisions of the regulation have been incorporated into the concordat (Article 12) and enjoy the legal status of an international agreement (*Journal of Laws of 1998, No. 51*, item 318).

I will now focus on several fundamental provisions of the regulation. However, I shall not discuss the details. These have been the subject of legal debate (Mezglewski, 2009).

Firstly, the regulation refers to all legally recognised Churches and religious associations. Polish law is especially liberal in this respect. It allows religious minorities to conduct religious instruction not only in a school setting, but also in so-called out-of-school catechetical points, usually located in parishes. After the fulfilment of certain conditions – the teacher must be employed at the school, must have a certain education, must carry out all didactic, educational and organisational duties, and must be supervised by the school management in terms of method and organisation of lessons. The grades from the so-called after-school catechetical point are included in the school diploma.

Secondly, religious education is an additional (optional) subject. Schools should provide education in ethics as well, as an alternative to religious instruction. Nevertheless, a pupil may decide whether to attend lessons of religion or ethics (up to a certain age a parent or legal guardian decides). In Poland, therefore, this is not a case of resignation from religious or ethical education, but a so-called positive choice. It is an option to choose religion as an additional subject, ethics as an additional subject or to choose neither of these subjects. Thus, it is possible to graduate from school without attending religion or ethics lessons.

It was in this context that the idea of a change of status of the religion/ ethics subject block from an additional subject to a compulsory one emerged already during the first conservative party government in 2005-2007. In 2022, the idea was reintroduced to the political discourse. To date, however, the original status has not been changed. The study of religion/ethics remains an additional subject.

Thirdly, the legal construction of the regulation stipulates that religious instruction in school is not a privilege of Churches and religious associations. It is provided at the request of parents and pupils and therefore, of the society. Religious instruction is provided at all levels of school education and, since 1999, in public pre-schools as well, for 2 hours per week. Teachers of religion enjoy in fact equal status as teachers of other subjects and are employed and paid by the school from a state subsidy.

Fourthly, religious education has a confessional character, which was especially firmly established from the legislative point of view. Firstly, curricula constitute the sole responsibility of Churches and religious associations. Secondly, Churches and religious associations have the exclusive right to delegate a teacher of religion. This right includes not only the canonical mission (granting authority to teach on behalf of the Church), but also the referral of a teacher to a particular school institution. Therefore, the principal office has no influence on what is taught and who provides religious instruction. The school authorities' supervision is only limited to matters related to the methodology and documentation of lessons.

The above legal structure has made it impossible to establish religion as an additional subject for the matura exam [exam at the end of secondary education, similar to A-Level exams in the UK or SATs in the USA]. Matura is a state examination, however, in its current form, the state cannot certify an examination in a subject, whose content it is unable to control. The situation remains a stalemate because – as I mentioned – the provisions for religious instruction are currently stipulated not only in the form of a ministerial regulation (a regulation can be amended), but also in the form of a concordat. In this case, a change would in fact require a ratification of a new international agreement. However, in the present state of the law, the question of religion gaining the status of an obligatory subject remains open. This is, then, what contemporary political discourse is concerned with.

From the legal perspective, such a solution is possible. It is essentially a question of political will of the ruling majority, as well as of social acceptance and educational changes. The latter two issues in particular reveal fundamental problems.

Firstly, in the eyes of the public, the current approach to religious instruction should be revised in a spirit of greater openness and dialogue. This is particularly important in the context of secularisation of the Polish society which has resulted in a growing number of people distancing themselves from institutional religion and a decline in the number of students who attend religion lessons (CBOS, 2007; Milerski and Karwowski, 2021).

Secondly, the introduction of compulsory religious instruction would require organisational and curricular measures to correlate the tasks of religious education at school with those of general education and to establish a 'friendly separation' between religious instruction at school and parish catechesis. This is the problem of reconciliation of religious particularism with the mandate of general education which is implemented by public schools.

Secularisation as a context

One of the hallmarks of the origins of modernity is the Reformation. Its representatives were passionate advocates for faith and religion. At the same time, they promoted ideas, which would in the future provide impulses of secularisation (universal priesthood, attributing greater value to secular life, deinstitutionalisation of the Church in the order of salvation, transfer of a part of education to secular authority, complementarity of spiritual and secular power). The key role in the philosophical realm was played by the Enlightenment. At that time, a distinction was made between the religion of the people and the religion of the enlightened. Also proclaimed was autonomy of rational thinking, which became emancipated from the influence of religion. The rationalist manifesto of the Enlightenment was not synonymous with laicisation. A famous sentence by Kant from the introduction to the second edition of the 'Critique of Pure Reason' (1st ed. 1781, 2nd ed. 1787) provides a prime example thereof: 'Thus I had to put knowledge aside in order to gain room for faith' (Kant 2001, 42, BXXX). In the post-Enlightenment era, the dialectics of the critique of religion and defence of faith continued. A classic example is the work of the young F. Schleirmacher, later dean of the Faculty of Theology at the University of Berlin, a member of the Prussian Academy of Sciences and one of the founders of pedagogy as a scientific discipline. In his 1799 phenomenological thesis (R. Otto considered it groundbreaking in the field of phenomenology) 'On Religion: Speeches to its Cultured Despisers', Schleiermacher not only diagnosed the actual nature of secularisation among educated people, but also described the essential character of religion which transcends the institutional corset. Indeed, the basis of religion is a perspective on the universe (Schleiermacher, 1995). In Schleiermacher's later work, the essence of religion becomes a sense of ultimate dependence on sacrum. A notable feature of his discourse is an apology of individual faith. Faith and secularisation are, from this perspective, a matter of individual consciousness. However, Schleiermacher, as an icon of that time, expanded

the spectrum of consideration: he broadened the perspective of individual consciousness to include consciousness of the religious community. Thereby, he brought theology and philosophy 'down to earth'. For individual and social consciousness are not only idealistic categories, they are also subject to historical processes. These processes are an empirical fact and open up the perspective of scientific exploration. Schleiermacher was a peer of G. W. F. Hegel. In his idealist philosophy, Hegel viewed the subject of history (Spirit) in its relation to the development of social consciousness, custom, ethos, social institutions, law. Similarly to an approach taken by Schleiermacher, his thought remained within a dialectical relationship between the Absolute and social reality. It remained unchanged, until the leftist idealist movement reoriented the way of thinking. It associated social consciousness with social existence. Social consciousness, and by extension religious consciousness, is a consequence of a certain state of social relations. Such an approach has opened up the perspective of research on secularisation. It was confirmed by research on the origins of modern religious pedagogy. D. Bonhoeffer, a prominent Protestant theologian, at the start of his journey as a pastor held a vicariate in the working-class neighbourhoods of Berlin. This was the interwar period, prior to the onset of the Nazi dictatorship. In his memoirs, he describes secularisation in a working-class environment. With the beginning of the 20th century, secularisation ceased to be a problem of individual attitudes to religion and the intellectual dilemmas of the enlightened classes, as it became a social fact. As a social challenge, it also provided the stimulus for the emergence of contemporary religious pedagogy (Schweitzer and Simojoki, 2005). Research distinguishes 3 phases in the study of secularisation.

The first phase is characterised by traditional approaches to secularisation which had their origins in the theories of L. Feurebach, K. Marx, F. Nietzsche or Z. Freud. In the traditional approach, elements of individual and cultural consciousness development are intertwined. According to classical psychoanalysis, the development of a person (the individual) and humanity (the society) moves in the same direction. Correspondingly, religion becomes a temporary form of consciousness or illusion of a human, who creates an idealised image of himself or herself. It may be an image of a father reflecting early childhood trauma, cultural patterns or dreams. It is an image through which a human being can become a god and be just like a god. In sociology, the understanding of religious consciousness in the context of the social base has proved to be of significance: the class division of the society, economic stratification, the presence of dominant cultures. The humanisation of the society, the rational and fair nature of social relations will cause religion to subside.

The second phase is related with the debate on the individualisation, privatisation and selective nature of religiosity. Its main point is the belief that religion does not die, but only takes on new forms under the changing social situation. An intrinsic role of religion is to legitimise existence and social life. For social institutions, customs, ethos to be socially recognised, they call for a semi-religious ritualisation (Bellah, 1967). Social transformations, conditioned by the mercantilisation of life, change the individual and social consciousness. They create a peculiar 'imperative of heresy', which does not negate religion, but rather allows the individual to choose and construct his or her own alternative, selective religious perceptions (Berger 1980, Luckmann, 1996). This concept is sometimes referred to as the economic theory of secularisation. With the advancement of industrialisation and urbanisation, the broader social groups, alongside the elites, enjoy the right to choose among basic consumer goods. Over time, the choice has led to a further increase in consumer choice on the part of the economy and, on the part of the individual, to an increase of expectations towards a plurality of choice and subsequently, a further expansion of the range of choice. The possibility of choice then shifted from the consumer sphere to other areas of life, world view and religious matters as well. Moreover, the possibility to make individual choices has become an 'a priori' of social and individual consciousness. As a result, institutional religion has ceased to be accepted in its entirety. Nevertheless, individual religious spirituality has remained an indispensable part of individual and social life. Meanwhile, it was noted that the pluralisation and deinstitutionalisation of religion have brought in elements of risk and uncertainty, which has become a source on which fundamentalist movements emerged or thrived. Therefore, on one end we encounter a selective religion or new spirituality, while on the other we face a religion which is conservative and exclusive. 'In present industrial societies, secularisation is a widespread phenomenon and scholars often assume that it signifies not only the decline but the total collapse of all religions (...). Secularisation marks the transformation of religion, not its annihilation' (Stark and Bainbridge, 2000, p. 339).

The third phase is a modern continuation of phase two and puts forward a proposition of a 'post-secular society', a 'religiously different' society. It has also been reflected in the religious pedagogy, which constantly seeks validation for religious instruction in schools (Franck and Thalén, 2021; Kittelmann, 2017). In 2020, the Protestant Church in Germany issued a comprehensive memorandum on education in the context of the decline of confessional affiliation of pupils and their parents (EKD, 2020). The EKD memorandum resulted in a summary of the relationship between religious education and secularisation in different countries. Analyses in this regard were published in the 'Theo-Web. Zeitschrift für Religionspädagogik. Academic Journal of Religious Education' (2021/1).

In Poland, a discourse in this regard is also present. A classic of Polish sociology of religion wrote the following in relation to religious education: 'In the conditions of the pluralistic society taking shape, faith cannot just be a matter of birth or cultural inheritance, or based on the guarantees of the social environment. For it will be above all an expression of a conscious and personal decision, or there will be none at all. Even if this alternative is not entirely valid, as religious beliefs will always need social and cultural support, it points in the direction of an evolution of religiosity which matches postmodern society, a religiosity treated as a personal value and lived through everyday life' (Mariański, 2004, p. 423).

It is necessary, in my opinion, to recognise the sociological fact of the individual pursuit of adequate forms of spirituality. This fact may be a starting point for the modification of religious education curricula. However, the solid empirical data leave no illusions. Secularisation in its literal sense progresses. The number of students in religious education decreases. The Centre for Public Opinion Research reports that in 2010, 93% of pupils attended religious instruction, in 2018 - 70% and in 2021 - only 54%. The 2021 study involved students of the final years of secondary schools, and thus these results should not be generalised (CBOS 2022, 5-6). The data is obtained from social surveys. The Institute for Catholic Church Statistics reports in its latest Annuarium Statisticum Ecclesiae Polonia that 82.4% of students in the 2021/2022 school year participated in religious instruction. These figures do not distinguish between primary and secondary school pupils (ISKK, 2022, p. 33). Churches provide data based on information submitted by their own organisational units, in the case of the Catholic Church - by the catechetical units of their respective dioceses. In primary schools, participation in religious education is indisputably much higher. In secondary schools, the level of participation falls significantly. It is supported by data from the education departments of the largest cities in Poland. In some conurbations, the percentage of pupils in religious education at secondary level is around 50% or below. For the construction of religious education, it is not only important to make statements about new forms of spirituality. Obviously, these forms may be included in the curricula. However, new forms of spirituality have

one feature – they must be practised. The public school is not an appropriate place for the implementation of religious worship, also in terms of alternative forms of spirituality. For this reason, the teaching of religion at school has to face the growing phenomenon of secularisation (Milerski, 2021; Milerski and Karwowski, 2021).

General education and religious particularism

There is no single definition of general education. In the humanistic tradition, general education is defined as one which goes beyond the acquisition of utilitarian competences. It is illustrated by a maxim, the authorship of which is attributed to various people: General education is what remains in us even when we forget all that we have learned at school. General education refers to the creation of cultural personality, a specific personal structure as a structure of meanings and values. It allows one to independently value and understand one's own existence and external reality. It is a grid of categories which organises other competences acquired in the process of education and socialisation. In the sense of cognitive and constructivist theories, the structure of meanings and values can be understood as the structure of cognitive schemas. However, what these concepts have in common, is the recognition of the subjective and active role of the individual in the construction of this structure. Another common quality which unites these concepts: an ethic of mutual appreciation, the common good and the search among differences for what is shared (EKD, 1994; Nipkow, 1990).

Viewed from this perspective, religious instruction can be a part of general education. However, the problem is that religious education cannot dominate general education. Religious teaching is conditioned by discourses from various perspectives, which it should either integrate or criticise (Domsgen, 2019, p. 23). Nevertheless, it does constitute a part of general education. In a public school, religion can be one of the elements creating the structure of our personality. Education of the future, which takes seriously both the religion with its claim to exclusivism, as well as the public school's commitment to general education, needs to find a balance, and perhaps even – to place religion under the responsibility of the public school as a school for everyone, which serves the collective interest.

The definition of the relationship between general education and religious particularism is a derivative from the legal arrangements about which I wrote in section 2. Nevertheless, the theory and practice of religious education in school depends on a number of historical, social and political factors.

Let's take Poland, for example. If we analyse the core curricula of religious education of different Churches and religious associations in Poland, a broad curricular spectrum, confessional as well as dialogical character of religious education in public schools seems to be apparent. However, social research proves that theoretical assumptions and practice are two different areas of reality. Religious instruction at school is understood as a 'component of catechesis as a whole' (Rogowski, 2016, p. 197). One may venture to argue that such a nature is present in religious instruction in some countries which originated from the socialist bloc, e.g. the Czech Republic and Slovakia. 'In the Czech Republic, religious instruction has an explicitly confessional character' (Muchova, 2016, p. 97). The practice of religious education is of a similar nature in countries associated with the Catholic tradition, including Italy and Spain, as well as in Orthodox Greece. In Spain, similarly to Poland, the goals of religious education encompass religious particularism with general education. Religious education performs the tasks of the school by definition. Nevertheless, it is in fact understood as a different form of catechesis (Garcés, 2020, p. 178-179). A similar situation is present in Italy. Despite the subordination of religious education to the tasks of the public school and the distinction between religious instruction at school and parish catechesis, it remains actually under the authority of the Church. (Alber and Rechenmacher, 2020, p. 98-99). In both countries, the option to abstain from religious education at school still remains. Overall, it can be said that, despite differences in details, there exists a similar model of religious instruction and its relation to the tasks of the public school in the aforementioned countries.

The Baltic states, especially Estonia, are influenced by Scandinavian models. It is an open religious education. In Estonia, there is interconfessional religious instruction. The concept is illustrated by the change in the main goals of religious education in school (Figure 1).

Religious education advisory pro- gramme (1997)	State syllabus for religious education (2010)
to provide knowledge about Christian culture	to provide knowledge about different re- ligions
to create a message for participation in the life of the Church	to support the development of pupils' worldview and critical thinking

Figure 1: Main goals of religious education in Estonia

to create prerequisites for joining church	to support development of student's moral development
to support understanding between confes- sions and to understand people with other religious views	to develop social awareness and respon- sibility, an open identity and readiness for dialogue across different religious and non-religious beliefs

Source: Schihalejev, 2014, p. 87.

In Scandinavia, religious instruction forms a part of the school curriculum and is a component of general education. In Finland, religious education is both confessional and dialogical. The study of religion – referring to Anglo-Saxon terminology – is a study from the perspective of religion, 'from religion', as well as a study 'about religion' (Ubani and Tirri, 2014, p. 110-111). In Sweden, the study of religion has the name 'knowledge about religion' and is, in its nature, above individual denominations. Moreover, the subject is evaluated by educational authorities. They consider it as an equal part of general education (Osbeck and Skeie, 2014, p. 246-249).

The status of religious education in the Netherlands and the United Kingdom, here limited to England, is rather different. On the one hand, it is a result of the historical and social understanding of the importance of religious education at school, as well as – or perhaps above all – the organisation of education and its financing. To put it briefly: in the Netherlands pluralism is considered to be of the utmost importance, which consequently delegates education to different entities managing the schools. Therefore, there is a diversity of teaching models in practice (Geurts, Avest, ter and Bakker 2014, p. 181-184). A personal note: During my study visit at one primary school in Uden in the Netherlands, the lessons had a Christian, biblical character and were taught by the class teacher (so it was not a catechist) every day, in the first hour of school. However, this does not exclude the reverse situation, that in the neighbouring school the religious instruction may have a form of knowledge about religions, existential challenges, society and ethos.

An equally complicated system can be found in England. There as well teaching of religion in school depends on the type of school. They are divided into schools maintained by state funds and those sustained by private funds. 'Within the group of state-maintained schools, there is a diverse mosaic of institutions, with their funding varying from full to partial' (Zielinski, 2016, p. 343). Religious education in schools funded by the state is diverse. This differentiation depends on local education boards. The curricular spectrum is broad, but emphases may be placed on confessional or, in certain multicultural regions, supra-confessional issues. In each case, religious instruction is part of the overall tasks of the school (Gates and Jackson, 2014, p. 78-86).

Religion constitutes a part of general education in Austria, Germany and Switzerland. Each of these countries has their own unique conditions. These are all federal countries divided into regions, cantons or federal states with a high level of autonomy. The situation – in the case of the Catholic Church – is complicated by the plethora of concordats signed with individual federal states (Warchołowski, 1997). Religious education at school is compulsory in the form of a religion/ethics subject block. Religious education has a confessional and dialogical character (Rothgangel and Ziebertz, 2016). It can be supplemented by additional religious formation classes, which are held in parishes, or – as it is currently the case in some Swiss cantons – as 'religion for all', an additional subject, organised additionally during one school year. However, these classes are institutionally separate from religious instruction at school. In some federal states in Germany it is possible to take the end-of-high school (Abitur) exam in religion. The common feature of religious education in these states is their versatile emphasis on: religious knowledge, confessional identity, understanding cultural and social reality. Religious education at school is conducted with two principles in mind. The first is the principle of dual responsibility of Church and State with regard to education and, consequently, cooperation in this regard (Rothgangel and Ziebertz, 2016, p. 120). The second is the principle of acknowledging social reality. The content and delivery of religious education at school must take into account the challenges of a pluralistic society, as well as the processes of secularisation (Schlag, 2016, p. 277).

Conclusion

Comparative studies show that European countries face similar challenges. Religious instruction at school is dependent on the understanding of its relationship to parish catechesis and the tasks of the public school in terms of general education and the promotion of an ethos of the common good. It is my belief that educational and church policy makers need to redefine not only the theory, but the practice of religious education in public schools as well. The redefinition should incorporate the tasks of the public school, a holistic understanding of church education with its religious particularism and, simultaneously, the need to pursue the mission of the public school in terms of general education, the recognition of social pluralism and the idea of the common good. It is essential to take secularisation seriously as a context of socialisation and education. The idea of introducing compulsory religious education in Poland needs to have its curriculum reconsidered in the spirit of dialogue and ecumenism, agreements between educational authorities and Churches on the scope of the curriculum, a clear distinction between religious instruction at school and parish catechesis and – perhaps – some reduction in the amount of course hours. A critical review of the present state of the matter does not serve to discredit the teaching of religion, but rather its defence as an essential part of general education in the public school.

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