Teaching for Toleration in Pluralist Liberal Democracies

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Abstract

This article determines which education enables the perpetuation of diverse ways of life and the liberal democracy that accommodates this diversity. Liberals like John Rawls, Stephen Macedo, and William Galston have disagreed about the scope of civic education. Based on an analysis of toleration—the primary means for maintaining a pluralist liberal democracy—I argue that schools should teach democratic participatory skills and a minimal exposure to diversity to enable citizens to participate in the democratic process of defining which cultural and religious practices the state should tolerate or prohibit through its laws. To make this argument, I contend, in contrast to several scholars, that toleration is practiced primarily between the democratic state and citizens rather than among citizens. Although many theorists do not show the educational implications of their theories, I conclude that schools must teach: (a) mutual respect among citizens, (b) citizens' constitutional rights, (c) democratic participatory skills, (d) a basic understanding of other worldviews, and (e) critical media skills. Students should master these components through instruction on government, cultures and religions, and the media, but more important through discussions and democratic simulations both inside and outside the classroom.

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THIS ARTICLE AIMS to determine which kind of education enables the perpetuation of a reasonable diversity of ways of life and a form of liberal democracy that accommodates this diversity. If there is insufficient civic education, citizens may lose the ability to coexist peacefully. However, if civic education is too extensive, it may forcefully liberalize and destroy reasonable life modes[1]—including their cultural values and morality that some argue liberal democracy depends on (see Galston, 1991, p. 9; Walzer, 1994, pp. 4–21).

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1 *Reasonable life mode* is based on Rawls's concept of "reasonable comprehensive doctrine" (2005, p. 59). However, I prefer reasonable life mode, as it encompasses not only doctrines, religions, and cultures but also their related practices, which can cause division and the need for (legal) accommodation of diversity.

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The question of accommodating diversity implies that education will be based on political liberalism and its emphasis on shared political principles among (conflicting) groups. It precludes a comprehensive liberal education focused on individuality or autonomy, which many liberals advocate (e.g., Callan, 1997; Gutmann, 1995; Levinson, 1999) but which threatens and is therefore unacceptable to certain cultural groups. However, political liberals have responded to this question of schooling differently. Most agree that schools should teach an understanding of liberal institutions but disagree about the degree to which cultural, philosophical, and religious studies, as well as critical thinking skills, should be taught. There are three main positions in this debate:[2]

The moderate view is represented by Rawls. In Rawls's brief treatment of education, he has indicated that children should not be taught comprehensive doctrines including liberal autonomy or individuality but "that children's education include such things as knowledge of their constitutional and civic rights," "prepare them to be fully cooperating members of society and enable them to be self-supporting," and "encourage the political virtues so that they want to honor the fair terms of social cooperation in their relations with the rest of society" (2005, pp. 199–200). Rawls has not really addressed schooling but seems to make civic virtues dependent on the educative function of liberal institutions (2005, pp. 142, 163). However, Costa (2004, p. 9) and Callan (1997, pp. 26–39) infer from Rawls's political liberalism that schooling should include exposure to different life modes so that children can learn to reciprocate civically.

The activist view is explained by Macedo. Macedo has stressed that citizens' freedom of religion does not extend to indoctrinating their children and that the state has a legitimate interest in schools teaching a diversity of worldviews so that children become tolerant (1995; 2000, pp. 12, 167). In contrast to Rawls, Macedo argued that state education should aim to transform children's beliefs for civic purposes. "The success of the negative constitutional project of individual liberty depends on a more positive, transformative enterprise that aims to shape normative diversity in a basic way, to foster a civic life supportive of liberal citizenship," and "individual freedom, the rule of law, and constitutionally limited government depend upon profound transformations in systems of belief and culture" (Macedo, 2000, pp. 10, 276, also 3, 8). For these transformations, Macedo relied on a Millian approach to civic education through institutions, like Rawls has done, but has made it more expansive (2000, pp. 169, also 6, 276). Despite his minimal intentions, Macedo's political liberalism is far-reaching:

> *For a liberal democracy* to thrive and not only survive, *many of its citizens should* develop a shared commitment to a range of political values and virtues: *tolerance,* mutual respect, *and* active

cooperation *among fellow citizens of various races, creeds, and styles of life [emphasis added].*[3] (2000, pp. 10–11; also 1995, p. 487)

The minimalist view is endorsed by Galston. Although Galston shares fundamental views with Rawls and Macedo, he wants schools to teach only toleration and a basic understanding of liberal institutions. He has left the rest up to cultural groups to truly accommodate diversity (1991, p. 256; 1995, pp. 525–528; 2003; 2005, p. 4; 2006, pp. 329, 334). He has argued that the "reasonable" pluralism of Macedo and Rawls, rather than "simple" pluralism, excludes too many life modes that are still compatible with liberal democracy, and that such exclusion causes homogenization and suppression that hurt liberal democratic stability (Galston, 1991, p. 119; 1995, pp. 518–519; 2006, p. 334).[4] Galston's solution to peaceful coexistence is preventing the state from interfering unnecessarily with life modes. He has admitted that the best civic education might be more demanding than what he proposes but argued, in contrast to Macedo, that the state does not have the authority to mandate such education (1995, pp. 528–529; 2002; 2006, p. 333). More than Rawls and Macedo, he fears that teaching children to think autonomously threatens groups with religious or nonliberal life modes and thus wants to keep such teaching to a civic minimum (1995, p. 521; see also Kukathas, 1997; Parekh, 2000, pp. 109–111). He has rejected the argument that toleration demands autonomy to reflect on other life modes, by indicating that citizens merely need to learn to refrain from using state power to advance their life modes over others'. He has conceded that citizens need a minimal awareness of other life modes for toleration but concluded that this does not require schools to teach children to be critical of their own way of life (1995, pp. 524–529).

Despite the different positions on education of these three, Rawls (2005, pp. 59, 194–195) has indicated that toleration is an important component of political liberalism on which education should be based, and Macedo and Galston, along with other scholars (e.g., Shorten, 2010; Weinstock, 2004, p. 114), all have argued that schools should teach toleration. However, none of them has considered the meaning of toleration and the schooling it requires. Toleration is arguably the primary means to perpetuating liberal democracy and allowing for a diversity of (conflicting) life modes. Here I draw out a neglected but important aspect of the education debate by analyzing the demands that toleration places on schooling.

My argument is that schools must teach students the democratic participatory skills needed to define liberal democracy's limits of toleration. I make this argument by showing the limited role of toleration in relations among citizens and offering a theory about how, through the democratic process, citizens help to determine the state laws that regulate society's limits of toleration.

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2   I use Rawls, Macedo, and Galston to illustrate the three positions because they are the most cited scholars in the citizenship education debate (Fernández & Sundström, 2011).

3   For commentary on Macedo and his "totalist" approach to political liberalism, see Fernández & Sundström, 2011, p. 375; Galston, 2002; Gutmann, 1995; Mulhall, 1998. For other comparisons of Rawls and Macedo on education, see also Costa, 2004, pp. 1–2; Vaughan, 2005, pp. 394–395.
4   For a discussion about Galston and his defense of diversity, see Callan, 2004, p. 77; Fullinwider, 2004; Vaughan, 2005, pp. 398–399.

Toleration

To tolerate means to disagree with a belief or practice but nevertheless to refrain from rejecting it. Rejecting a practice thus goes beyond disagreement or disapproval. Rejection means to prevent or eliminate the practice. Normally, we accept what we agree with and reject what we disagree with, but in toleration we do not reject that with which we disagree. For example, in the Netherlands, many non-Muslims disagree with the "radical" Islamic ideas of Salafist organizations but refrain from converting, harming, or persecuting these organizations (see NRC, 2016c). This disagreement defines toleration. If the non-Muslims were indifferent to, or even appreciative of, the orthodox Muslims' beliefs and practices, it would not be toleration. Another example is a Copenhagen public school that organized women-only parents' meetings to accommodate immigrant mothers whose culture would otherwise prevent them from attending. Many Danes disagreed with this initiative but tolerated it because they believed schools should be allowed to make autonomous decisions and it promoted school communication with parents who would otherwise be excluded (Maussen & Bader, 2012, p. 60). Two further observations about toleration are crucial to education:

The first observation is that the limits of toleration are not obvious and require knowledge of life modes and critical thinking to be defined. Defining the limits is complicated, as toleration has two boundaries rather than one. The first arises from the fact that we cannot accept everything. For instance, in 2013, many Australians did not accept the anti-Islam ideas of the Dutch populist Geert Wilders. However, they still chose to "tolerate" these ideas by allowing Wilders to give a speech in Australia (Soutphommasane, 2013). Thus, there is a boundary between acceptance and toleration. The second boundary arises from the fact that we cannot tolerate everything that we do not accept: certain beliefs, or the practices that result from them, are simply wrong. As we have no moral or pragmatic reason to tolerate them nevertheless, we reject them. For example, Turkey tolerated the Islamic beliefs of many of its citizens but banned the Refah Partisi (Welfare Party) in 1997, arguing that this political party's objectives of introducing theocracy and sharia law threatened the country's principle of secularism and democracy (ECHR, 2003). Thus, by determining what is tolerable, we simultaneously determine what should be rejected (see also Barry, 2001, pp. 127–144; Macedo, 1995, p. 485; Parekh, 1999, p. 163; Tamir, 2003, p. 508).

The second observation is that the relations of toleration determine what citizens should be taught in schools. Three ideas are key. First, a prerequisite of any relation of toleration is that the tolerator must have the power to reject the life mode of the tolerated. Consequently, "toleration can take the form of (a) not making people do things they are unwilling to do, as well as (b) not preventing their doing what they wish to do" (Jones, 2010, p. 43, also 40; also Horton, 2011, p. 290; Lægaard, 2010, p. 23). For example, the state is tolerant when it does not force Protestant children to attend secular state schools or does not prevent these children from attending Christian schools. Toleration is consciously refraining from the action of rejecting a belief or practice despite disapproving of it and having the

power to prevent or stop it. Second, this prerequisite of power explains why toleration was traditionally a vertical relation in which a dominant group extended toleration to its subordinates (Forst, 2004, pp. 316–317; Heyd, 2008, pp. 171–194). For example, in previous centuries, monarchs in Europe determined which belief systems they tolerated within their territories. However, Heyd (2008, pp. 171–194) and Creppell (2008, pp. 315–359) have argued that this relation is largely replaced by one in which citizens tolerate each other reciprocally on a horizontal level. Jones added that "personal" toleration among citizens is more prevalent than "political" toleration among institutions and citizens (2010, p. 45). Similarly, Gutmann and Thompson have argued that "procedural principles (such as majority rule) regulate public policy disputes, and interpersonal principles of minimal moral content (such as toleration) take care of disputes outside the public forum" (1990, p. 65). These scholars thus have suggested that the vertical relation of toleration plays a minor role in contemporary liberal democracy—if any. Third, this idea of a horizontal relation coincides with the argument that toleration must be reciprocal (Creppell, 2008, pp. 315–359; Forst, 2004, p. 317; Habermas, 2003, pp. 5, 7). For example, Forst stated that "toleration can only be called for towards those who are tolerant; it is a matter of simple reciprocity" (2004, p. 313).

Respect for Public Identities and Citizens' Lack of Power to Reject Practices

The ideas that determining the limits of toleration is complex and that toleration in contemporary liberal democracy is primarily horizontal and reciprocal among citizens suggest that citizens must make complex evaluations of toleration in their daily interactions. For example, when a Catholic student encounters a Muslim fellow student wearing a niqab on the school bus or sees a gay couple holding hands at her high school, she has to judge whether to tolerate the practices of wearing a veil or displaying homosexuality. To make such judgments, she needs knowledge about other life modes and the deliberative skills to evaluate these appropriately, or so the argument would go. However, I contend that schools should teach this cultural knowledge and reasoning for toleration, but that the reason is different. The relation among citizens requires little toleration. Rather, citizens must gain the capacity to make judgments of toleration for their participation in the democratic political process.

Liberalism attempts to accommodate diversity by encouraging citizens to separate their private and public identities. Their different (mutually exclusive) life modes do not conflict directly, but their public interaction is guided by a shared political identity (see Habermas, 2003, p. 12; Macedo, 2000, p. 164-187; Mendus, 1988, pp. 4–10; Vaughan, 2005, p. 402). Critics may object that it is difficult in practice to distinguish between citizens' public and private sides (see Forst, 2004, p. 319; Horton, 2011, p. 299; Vaughan, 2005, p. 402). For example, an employee of the Dutch National Bank was fired in 2015 because she rented herself out as an S and M mistress in her private time and was therefore said to be liable to blackmail (Standaard, 2015). Thus, the bank punished the woman for having allowed the possibility that her private side might affect

her public side. This is a valid objection, and indeed, separating public and private identities is difficult. However, despite this difficulty, we should not give up trying to foster mutual respect among citizens at least within their public identity. The objection should serve as an additional reason for schools to teach students the merits of minimal civil respect for others.

Once we separate public and private identities, we assign a basic respect to the public side of citizens (see also Dent, 1988, pp. 115–136; Lægaard, 2010, p. 29). Religious people must try to limit the influence of their beliefs on their interactions with other citizens and respect others based on their shared citizenship. Macedo (1995, p. 487) stressed that "evangelical atheists" and "those who espouse totalistic versions of liberalism" must do the same and respect religious people publicly as citizens. Such respect differs from toleration, in that it is unconditional and does not require an evaluation of the other's life mode (see Habermas, 1994, p. 129). For example, in a deeply divided liberal democracy like Israel, students can only interact peacefully so long as they put aside their conflicting Jewish, Christian, and Islamic beliefs and show a basic respect for each other in the public school based on their common Israeli citizenship.

This preclusion of the need for an evaluation of life modes also means that respect is neutral rather than positive. Such neutral respect contrasts with the "appraisal respect" (Darwall, 1977, pp. 39–49) or "mutual respect" (Gutmann & Thompson, 1990, pp. 76–79) that some argue for, in which citizens evaluate each other's moral worth and reach mutual appreciation, and which, therefore, is supposed to be more demanding than toleration (Gutmann & Thompson, 1990, p. 76; also Reich, 2002, p. 136). They contrast this appraisal respect with "recognition respect," which all citizens are accorded without any (positive) evaluation of their life modes (Darwall, 1977, pp. 39–49). However, this unrealistic expectation of appreciation is based on the unwarranted assumption that civic life is about groups coming together morally rather than negotiating politically. Gutmann and Thompson have argued that mutual respect is necessary for "resolving disputes" "on a *moral* basis" rather than "count[ing] on procedural agreements, political deals," and that "the underlying assumption is that we should value reaching conclusions . . . through moral reasoning rather than through self-interested bargaining" (1990, p. 77). The ideals of moral reconciliation and mutual appreciation are praiseworthy but unrealistic in a society divided among conflicting groups. We cannot expect citizens to regard positively those they fundamentally disagree with, but we do need to find a way for them to live together. That is why we need a liberal democracy in the first place: liberal rights protect citizens and accord them political equality, and the democratic process allows them to deliberate their differences peacefully. Even though it is unfortunate that civic life is conducted through "self-interested bargaining" rather than "moral reasoning," it is precisely these "procedural agreements" and "political deals" that enable peaceful coexistence.

Besides, Darwall, Gutmann, and Thompson do not take seriously enough the implication of appraisal respect that, if a citizen does not merit appreciation following evaluation, she will not receive respect. Such lack of respect would put her in danger of

unequal treatment, which is again why the liberal state enforces *recognition* respect among *all* citizens. For example, when male members of the Christian political party SGP in the Netherlands "evaluated" their female coreligionists, they did not reach an equal "appreciation" for them and, therefore, prevented them from standing for election. Consequently, in 2010, the High Council of the Dutch liberal democratic state had to intervene to mandate that the party allow females to be eligible for election (NJCM, 2010), guaranteeing that citizens in their public interactions would continue to respect each other unconditionally as political equals (recognition respect).

Finally, we can define the difference between unconditional respect and conditional appreciation or rejection in terms of status. Status involves no value judgment but is assigned to every citizen.

> *Respect, as used in "respect for persons," invokes an idea of status rather than merit. Thus, we may think that a person's beliefs and form of life are without merit, but our respect for her status as a person can provide a reason why we should tolerate her beliefs and form of life in spite of our negative appraisal of them and even though our negative appraisal is soundly based. (Jones, 2010, p. 45)*

The school environment is illustrative: children are all accorded the status of "student" and subsequently expected to treat each other equally without judging the worth of each other's academic performances or opinions. The notion of status matches the liberal idea of respecting individuals as autonomous agents who can make decisions about their life modes privately (see Raz, 1988, pp. 155-170; Reich on "capacity" for autonomy, 2002, pp. 89–112). Because we respect each other's status as fellow citizens, we can make private decisions about our life modes in our capacity as respected citizens.

Even when a citizen evaluates others' practices, she still has little power to reject them. In a liberal democracy, the state has a monopoly on the means to punish intolerable practices. Therefore, toleration is even less significant in the relation among citizens. Here it is surprising that Jones argued that toleration primarily occurs among citizens, given that he himself has stated that toleration requires power to reject disapproved practices (2010, p. 43–45). Of course, this distinction between a powerful state and powerless citizens is not sharp. Citizens have certain power over others, such as a parent over a child or a teacher over a student. Also, a citizen has minor means of rejecting others' life modes. She has the power of persuasion and can try to change others' beliefs (e.g., Christian missionaries trying to convince atheist pedestrians to abandon their godless beliefs). In addition, "public opinion" could influence what is tolerated or rejected between citizens (Jones, 2010, pp. 44–45). Groups of citizens may ostracize individuals whose life mode they reject (a Hindu student in India might invite all her Hindu classmates to her birthday party but not the only two M Normally, we accept what we agree with and reject what we disagree with uslim classmates). No political system can completely control how citizens associate with each other, and more important, a primary purpose of a liberal democracy is to provide citizens with the freedom to (not) associate with whoever

they want *in private*. However, the power to reject through social exclusion *in public* is limited by antidiscrimination laws. For example, in 2012, the owner of Masterpiece Cakeshop (a "public accommodation") in Colorado tried to "reject" the practice of same sex marriage by refusing to bake a wedding cake for a gay couple, citing his religious beliefs, but the Colorado Civil Rights Commission determined that this refusal had been discriminatory and therefore illegal (ACLU, 2012). Similarly, the state enforces nondiscriminatory recruitment policies: even religious schools are generally not allowed to select students based on their (non) religious identities.

The main point here is that, because respect is the primary means to enabling peaceful coexistence among citizens and these citizens have little power to reject practices, toleration plays only a minor role in the horizontal relation among them.

Defining the Limits of Toleration through Democratic Politics

Even though citizens have little need for toleration among themselves, they must maintain common limits of toleration; otherwise, they risk two scenarios.

The first is an anarchical system in which each citizen defines her own limits of toleration, which are not reciprocal, and therefore, toleration soon fails. For example, many Europeans expect others to tolerate Christian symbols, such as the crucifixes in Italian state schools that the European Court of Human Rights in 2011 ruled did not violate the right to freedom of conscience of non-Christians (Guiraudon, 2011). However, they are often intolerant of Islamic symbols, as illustrated by Ebrahimian v. France, in which the same court judged in 2016 that it was lawful to not renew the contract of a Muslim hospital employee for refusing to remove her veil (Yarrow, 2016). This asymmetrical toleration is arguably making Muslims decreasingly tolerant of non-Muslim symbols, and so a downward spiral of intolerance emerges, in which citizens no longer tolerate other life modes and merely try to promote their own.

The second is a situation of moral relativism in which even harmful practices are tolerated. A citizen might judge that she cannot legitimately evaluate other life modes from within her belief or that the best strategy for perpetuating her life mode is to refrain from criticizing others—to live and let live. For example, following permission granted to Muslims to adjudicate certain cases relating to marriage or divorce in Sharia courts in Britain and Greece, German politicians raised the possibility of allowing Muslims in Germany to settle family cases in Sharia rather than state courts (Spiegel Online, 2012). However, given that women generally have lower status in Sharia courts, citizens protested that German Muslim women might suffer harm resulting from the infringement of their liberal individual rights in this situation of moral relativism.

The idea of shared limits suggests that people must agree on what constitutes reasonable disagreement. Therefore, these limits are reciprocal. Citizens might agree to allow all religious symbols in schools like in Britain or ban religious symbols in schools altogether like in France. To make toleration work and avoid

intolerance or moral relativism, citizens must reciprocally honor these limits. Yet how are the limits determined if not through horizontal interactions? Scholars rarely answer this question. They discuss the boundaries of toleration, but few specify how these are drawn. The best descriptions are found in the justification approach and evaluation approach.

The justification approach is represented by Forst. Here, the limits of toleration depend on the principle of public justification. The approach distinguishes between the "permission conception," in which the majority defines the limits of toleration arbitrarily and, therefore, they are unjust, and the "respect conception," in which citizens create mutually acceptable limits by reciprocally refraining from shaping these limits according to their life modes. The reciprocity of the latter model provides the political justice on which toleration is based (Forst, 2004, pp. 314–318).

The evaluation approach is advocated by Parekh. Its account of how the limits of toleration are defined is more realistic in that it assumes that power relations in society are unequal. Society should decide which practices to tolerate based on its "operative public values." These values are defined in the constitution, laws, and "civic relations" between people. They evolved historically and continue to change through public dialogue. Unlike the public justification principle, the operative public values "articulate a specific conception of the good life" (Parekh, 1999, pp. 168–175). The evaluation approach implies that toleration is still predominantly a vertical relation of power in which an authority extends toleration to the practices of subordinates. However, even though the approach indicates that the operative public values are partly defined in constitutional and regular laws, it does not indicate how these laws emerged.

I have critiqued these approaches elsewhere, arguing that they respectively understate and overstate the influence of citizens' life modes in determining the limits of toleration; that the idea of toleration as restraint of power is too limited in the justification approach; and that both approaches remain too abstract (Van Waarden, 2012). Yet most important is that neither the justification nor the evaluation approach demonstrates how the limits of toleration are primarily defined in liberal democracy—through democratic legislation. Namely, in contrast to what scholars contend about the transition from vertical to horizontal toleration, there is still an important vertical relation of toleration between the democratic state and its citizens. The state continuously (re)defines the limits of toleration and has the power to sanction transgressors. It (re)defines these limits through its laws, which are reciprocally just in that they must be respected by all citizens equally. As a democracy represents its citizens, citizens play a role in determining the extent of its toleration. But how exactly do democracies define the limits of toleration, and which knowledge and skills do citizens require for their involvement?

In liberal democracies, representatives largely determine the limits of toleration through laws on behalf of citizens. These laws indicate which practices the democracy tolerates and which it rejects through prohibition. This prohibition is enforced through prosecution, penalties, and imprisonment. The limits of toleration do not always correspond with what representatives deem

rejectable: sometimes intolerable practices are legally tolerated for moral or pragmatic reasons (see Forst, 2004, pp. 321–322; Jones, 2010, p. 40; and Heyd, 1996, pp. 3–4). Laws only indicate the outer boundary of toleration between the zones of tolerable and rejectable practices, not the inner boundary between tolerable and unobjectionable practices. Citizens can thus choose to approve or disapprove of particular practices—but the laws indicate which practices are rejected. The legal limits of toleration are defined in three situations:

- In the first situation, representatives indicate directly that the state rejects practices that most citizens deem intolerable. Representatives might want to reject female circumcision and, therefore, create a law against it,[5] which means that the practice is no longer tolerated. Some will judge such practices to violate the harm principle (so long as a person does not harm anyone, she should be free to think or do as she wishes, Mill, 2002, pp. 11–13; also Parekh, 1999, p. 165; Raz, 1988, pp. 155–170). Therefore, they might argue that these practices should not even be up for debate, but constitute violations of constitutional rights.

- In the second situation, a shift in the limits of toleration results from a reinterpretation of these constitutional rights. Constitutions are important in defining toleration, as they provide citizens with rights that no cultural practices may infringe. For example, parents generally may not invoke religious reasons to prevent their child from receiving education or life-saving medication, because it would violate the child's individual rights. More generally, the basic rights of life and freedom of conscience prevent practices such as honor killings and forceful religious conversion. Constitutional rights place a basic limit on the toleration of cultural practices. However, these rights are generic formulations that must be interpreted. For example, a debate about constitutional rights to freedom of speech and conscience emerged when an imam in the Netherlands called homosexuality a disease at a Friday worship. Citizens and politicians argued that the imam was violating the principle of nondiscrimination. Others replied that the imam *expressed his belief*, which is protected through the freedoms of conscience and speech. However, in expressing his belief, he arguably incited others to engage in the *practice* of discriminating against homosexuals. The result was a public discussion about the extent of the freedoms of speech and religion and antidiscrimination laws—and thus the extent of toleration (NRC, 2004). Such debates can lead to protests, petitions, and the election of parties that tighten or loosen the application of constitutional rights.

- In the third situation, the limits of toleration are affected indirectly through "neutral" laws that seek to regulate uncontroversial issues. The Dutch state, for example, intended to reduce animal cruelty by prohibiting certain slaughter methods. However, this regulation would have impeded the practices of Muslims and Jews, who require their animals to be slaughtered traditionally, and therefore they successfully protested against the law (Soeters, 2011). A second example is Wisconsin, which mandated that children must attend school until age sixteen. The law meant to ensure that all citizens achieve a basic education, but Amish parents challenged it successfully, claiming that schooling beyond grade eight would hinder their practice of instilling their life mode in their children (see also Galston, 1995; Gutmann, 1995, pp. 565–576). However, the appeal for religious exemption is not always successful: in 2006, the Danish High Court ruled that Sikhs would not be exempted from the law against carrying knives in public to wear their ceremonial kirpan dagger (though countries such as England, Scotland, and Canada have granted this exemption to carry the kirpan in public, including in schools).

What role do citizens play in (re)defining these different types of laws that determine society's limits of toleration? Perhaps most important, citizens elect representatives and hold them accountable. In some places (e.g., 23 U.S. states), citizens also elect judges. Moreover, citizens influence political decisions through contacting their representatives, protesting, writing petitions, writing opinion pieces, and organizing advocacy groups. Once the limits of toleration have been determined, citizens can challenge these limits by taking cases to court. Occasionally citizens have the opportunity to express their views directly through referenda. For example, in 2009, Swiss citizens voted in favor of prohibiting the construction of minarets on mosques, thereby decreasing the state's toleration of Muslim practices (BBC News, 2009). Certain states have proposition systems that allow citizens themselves to introduce laws for a direct vote: citizens of California voted to ban same-sex marriage in Proposition 22 in 2000 and Proposition 8 in 2008, thereby also decreasing the state's toleration of a minority practice.[6] Finally, digital media such as blogs and wikis provide ways through which citizens advocate political views (see Kahne, Lee, & Feezell, 2012, pp. 3–4). Thus, citizens play a limited but important role in shaping the limits of toleration. But do they require particular knowledge for their participation?

To represent themselves politically, citizens require knowledge of the political process and its "access points." They must be able to vote, contact an official, and find a lawyer. More generally, they should know how to volunteer, donate to campaigns, become member of a party, contact a lobbyist, start a petition or proposition, engage in advocacy work, organize protests, and use the (digital and social) media. Important here is that politics is generally not an altruistic deliberation guided by "public reason,"

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5   For example, Law No. 74 of 15 December 1995 Prohibiting Female Genital Mutilation in Norway; Law No. 316 of 27 May 1982 Prohibiting Female Circumcision in Sweden; and the Prohibition of Female Circumcision Act of 16 July 1985 in the United Kingdom.

6   The author thanks one of the anonymous reviewers for bringing to his attention the proposition systems that exist in certain states, which also affect the democratic limits of toleration.

as seems to be promoted by several theorists (e.g., Reich, 2002, p. 126)—in which citizens put aside their narrow interests to discuss the common good—but rather a process of negotiating, bargaining, and compromising among groups with conflicting interests. Consequently, participatory skills are no luxury, but essential to the survival of a citizen's life mode and, indirectly, liberal democracy itself. Citizens need "defensive" participatory skills when they constitute the minority on an issue and must defend their life mode against majority intolerance. This might include the skills to build a coalition, such as the cooperation among the Protestant, Anglican, and Orthodox Churches in the Church and Society Commission that lobbies EU policymakers (De Vlieger, 2012); or to defend religious rights judicially, like Leyla Şahin, who in 1998 took the Turkish state to court for having refused her the right to wear the Islamic headscarf at Istanbul University (ECHR, 2005). Conversely, citizens require "preventive" participatory skills when they form the majority but need to prevent intoleration of minority practices. For example, they should know how to join a majority party like the Dutch liberal party VVD to help reduce its anti-immigrant rhetoric and "tolerate" settling more refugees in the Netherlands. "Preventive" participation is no less essential than the "defensive": diversity can only be maintained when citizens know how to defend their minority practices and prevent the rejection of others' practices if they are tolerable.

In terms of knowledge required to form opinions on which practices the state should tolerate, it might be argued that each citizen could just endorse her life mode's position. However, many citizens do not have coherent life modes and hold conflicting beliefs. In addition, life modes do not prescribe positions on all issues: atheists might oppose Protestant demands for schools to teach creationism and abstinence over evolution and sex education but might not have an opinion on whether Muslim students should be allowed to pray during class time and the Islamic past should be included in the national history curriculum. Subsequently, one might contend that, since laws are about practices, citizens require no knowledge about others' beliefs: the state must allow harmless practices and prohibit harmful ones—regardless of the religious meaning. Indeed, murder should be prohibited, regardless of the murderer's beliefs. However, the meaning of harm is controversial. In determining whether a practice is harmful, it helps to consider its motivation. The Muslim demand that girls wear headscarves in schools may seem oppressive, but some argue that within the girls' culture it is liberating (e.g., Moghadam, 1994). It is meaningful to the girls and improves their equality vis-à-vis boys, as they are no longer judged by appearance. Also, for Rastafarians and certain Native Americans, the use of drugs is a "requirement of their way of life," unlike for "white adolescents" for whom it is "a self-chosen action" (Parekh, 1999, p. 163). These arguments may not persuade others, but the knowledge that practices are obligatory within a different life mode may change citizens' opinions on the limits of toleration. Finally, it may seem that citizens need no prior knowledge of other life modes, because once these are threatened, their adherents will promote their practices via the media in an effort to save them.

Given these considerations, I argue that citizens need a minimal knowledge of other life modes and a solid understanding of how the media work. Citizens obtain information they need for decisions about toleration largely through the media, but they need a framework of reference about cultures and religions in which to interpret this information. Citizens need not have a thorough knowledge of all worldviews—which would be impossible—but to understand demands to wear hijabs or kippahs in workplaces or slaughter animals ritualistically, it would help if they had a basic knowledge of Islam and Judaism. In addition, an understanding of how the media function can help citizens assess media information critically. For example, understanding how the media depend on sensationalism would help citizens to relativize (false) claims like "American schools are becoming Islamized."

The critical thinking required to evaluate cultural practices and their media coverage does not correspond to the "autonomy" that many liberals advocate. Though autonomy is usually associated with comprehensive liberalism, Reich (2002) has argued that even political liberalism relies on "minimalist autonomy": "underlying [the] political virtues is the notion that citizens are autonomous" (pp. 41–42, 46).[7] He acknowledged that autonomy "is not supported by all reasonable ways of life" (p. 46). Galston prioritized accommodating this reasonable diversity over autonomy and claimed that citizens always have a "right of exit" from their cultural group, but Reich has objected that such a right of exit is only meaningful if citizens are *proactively* taught to scrutinize their life modes and consider alternatives autonomously (pp. 53–54). However, Reich has treated liberal democracy too much as a "supermarket" in which life mode "options" should be made available to citizens and from which they should be actively encouraged to choose: "the conception of autonomy I defend refers to a person's ability to reflect independently and critically upon basic commitments, values, desires, and beliefs, be they chosen or unchosen, and to enjoy a range of meaningful life options from which to choose" (p. 105, also pp. 1–14, 46, 101, 106; Nussbaum, 1994, p. 4). Thus, Reich's "minimalist autonomy" is not that minimalist. Reich is correct that citizens need to learn minimal critical thinking and have a basic understanding of other worldviews for liberal democracy to function, but his assumption that political virtues depend on autonomy is incorrect.

My analysis of toleration shows that the demands of liberal democracy are more basic. Citizens need not reflect critically on their own life modes, let alone be encouraged to choose among different life modes in society. To enable the coexistence of cultural groups in a liberal democracy, citizens need not be independent (autonomous) from any religious or cultural commitments. Rather, from within their particular life modes, they should be able to engage in the democratic process to defend their practices and to evaluate critically whether the practices of other groups should be legally tolerated. The limited extent of the demands that toleration

7   For an explanation of the argument that there is a slippery slope between political and comprehensive liberalism, see also Gutmann, 1995, p. 573; Kymlicka, 1995, pp. 107–130, 152–172; 2002, pp. 208–283; Vaughan, 2005, p. 404.

places on citizens—that it does not force people to critically assess their own way of life—also means that there is no conflict between a person's private beliefs and the critical thinking that she is expected to engage in publicly as a citizen.[8] Finally, Reich (2002) has overestimated the demands of a meaningful right of exit. He wondered how "it [would] 'seem desirable' to assess alternatives" unless one is autonomous, and argued that "portals of exit are in effect sealed shut when there are no windows to the outside world" (p. 54). However, history has shown that when people are unhappy with their religious, political, or economic situations, they tend to at least look for alternatives. Many African and Middle Eastern refugees in Europe did not receive an education for autonomy, but once their life situations became undesirable, they sought alternatives. If people in developing countries manage to inform themselves about alternative life modes in another continent, then surely citizens of modern mediatized liberal democracies with more advanced economic and technological means must generally be able to find alternatives within their own society when necessary. Overall, autonomy requires citizens to actively consider other life modes as alternatives to their own, whereas toleration requires citizens to understand that these life modes matter to fellow citizens and therefore perhaps deserve to be tolerated.

The Educational Requirements of Toleration

Toleration thus requires more than the minimalist political liberal education but less than the activist education. The minimalist position is correct that a liberal democracy that seeks to accommodate diversity can only mandate schools to teach toleration and does not require students to scrutinize their own life mode. Yet toleration requires more engagement with different life modes and critical deliberation than Galston has acknowledged. However, the activist position is too demanding, because toleration does not require a broad institutional effort to foster appreciation and cooperation between citizens, nor a transformation of their values. If liberal democracy intends to accommodate its diversity of (conflicting) life modes through toleration, it cannot expect students to develop a positive recognition of beliefs that conflict with their own, or to transform their beliefs so that they will agree more with others. The education required for toleration approximates Rawls's moderate position: that citizens must learn about the liberal democratic process and be exposed to different life modes. This exposure to life modes that the moderate position advocates is primarily based on the idea that citizens must cooperate and reciprocate horizontally. By contrast, an education for toleration includes this minimal exposure to enable citizens to make judgments about vertical toleration between the state and its citizens. Rawls, like many theorists, did not really address the implications of his theory, but what are the consequences of the moderate position for schooling?

Research has shown that democratic education can indeed increase civic participation (Gibson & Levine, 2003; Hess &

McAvoy, 2015, pp. 57, 68, 145; Kahne, Chi, & Middaugh, 2006, pp. 396, 400; on toleration, Avery, Bird, Johnstone, Sullivan, & Thalhammer, 1992; Wood et al., 1994), but that there "has been a striking lack of consensus about what democracy requires of citizens and of schools" (Westheimer & Kahne, 2003, pp. 9–10). Democratic education has different outcomes depending on its objectives, and therefore, it is important to clarify those objectives (Kahne, Chi, & Middaugh, 2006, p. 404). Toleration leads to five objectives: students must learn (1) to respect each other as fellow citizens in public; (2) the constitutional rights that protect citizens' life modes; (3) how to participate in the democratic political process; (4) the basic characteristics of other life modes; and (5) how to obtain and interpret information from the media.

These objectives can be reached through public, as well as private and religious, schools. Toleration does not demand teaching liberal autonomy (including the critical reflection on one's life mode that might be difficult in a religious school) and liberal democracy attempts to enable the perpetuation of reasonable life modes. Even if "mixed" schooling would be ideal for learning to tolerate difference (Brighouse, 2006, p. 21; Marx & Byrnes, 2012), then over time there might be little left to tolerate if cultural groups would not be able to instill their life modes in their children through their schools. Thus, toleration is compatible with, and arguably supports, the practice of most liberal democracies—e.g., Austria, Belgium, and Ireland, but increasingly even France and the United States—of publicly funding religious schools (Maussen & Bader, 2015, pp. 8–9). These religious schools should be allowed to instill their worldviews in their students, in contrast to the argument of Reich (2002), who endorsed religious schools but indicated that regulations should "urge not the teaching *of* religion but teaching *about* religion [Reich's emphases]" (p. 198), and prescribed that "charter schools not distinguish themselves on the basis of ethnoracial, religious, or other cultural divisions in society" (p. 209). Given that Hess and McAvoy found that students educated in a "like-minded school" were more politically engaged (2015, p. 146; see also Jamieson & Cappella, 2008; Mutz, 2006), religious schools might even stimulate participation in democratic deliberation about toleration in later life.

Within the curriculum, three subjects are particularly important for teaching toleration: a government class, a cultural and religious perspectives class, and a media course. The government class seems best placed to teach the first three objectives. First, students must learn to respect each other as fellow citizens in their public interactions, which supports Hess and McAvoy's aim of teaching "political equality" (2015, pp. 5, 156). Students must be shown the reason: that common life only functions peacefully if citizens put aside their differences when interacting in public. Simultaneously, students should learn that not all cultural practices are tolerable but that they should deliberate democratically about what their society should accept or prohibit, rather than acting individually against others. The line between public and private is not always clear, but given the importance of this normative distinction for the maintenance of liberal democratic diversity, schools should encourage students to separate public and private behavior (which supports Dewey's idea that education should be

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8   For the argument that minimal exposure to other life modes and minimal critical thinking skills need not lead to a critical stance towards one's life mode, see also Appiah, 2003, p. 72; Heyd, 1996, p. 15.

"purifying and idealizing the existing social customs," 1916/2007, p. 22).

Second, schools should teach students liberal democracy's constitutional rights, which limit the scope of decisions of toleration. Students should understand that their beliefs, and some of their practices, are protected and must be tolerated by the state, and that conversely there are other beliefs and practices that they cannot legislate against. For example, American students should know that they can use their rights to religion, speech, and assembly to protect their life modes, and German students that they can appeal to their constitution to prohibit intolerant political parties (see Schmitt, 2000). In democracies with judicial review, students should learn about examples of citizens challenging "intolerant" laws in court, such as the advocates of same-sex marriage in the United States in 2015 (Liptak, 2015). This knowledge will clarify to students the power that the state has and will prevent them from unnecessarily fearing intervention in their life modes.

Third, the government class should teach democratic participation. Students should learn how to vote, contact officials, volunteer, access advocacy groups, start a petition, and organize a protest. Again, it is essential that they understand the reason: they need these skills to represent and defend their life modes and to contribute to maintaining a state that tolerates reasonable practices. Students could learn about examples that illustrate the importance of democratic participation for defining toleration. For example, in France they might study S.A.S. v. France, a 2011 case in which a Muslim had objected that a new law prohibiting facial concealment in public conflicted with her religious duties, and in which the ECHR ruled that the French state's aims of pursuing "public safety" and the "protection of the rights and freedoms of others" justified the law. This case is interesting for students, as the court stated that it exercised restraint in its review because society had the freedom to decide on such issues and the law had been arrived at through the democratic process, while the court also warned the state that creating such a law risked further stereotyping between life modes and increasing social conflict (ECHR, 2014). The case shows students that they, as democratic citizens of the society, have influence on the toleration limits but also that they need to consider how laws affect life modes and their interactions. Furthermore, students should learn that even though their life modes might constitute a minority or majority, they share identity characteristics related to, for example, gender, age, and occupation that make them part of different minorities or majorities (Van Waarden, 2014), which places different demands on them in terms of forging coalitions or exercising restraint of majority power. Students need to be shown that their contributions make a difference, so they will be more inclined to participate (see Kahne, Chi, & Middaugh, 2006, p. 397; Levinson, 2013, p. 10). Political participation among young citizens is low and not a focus within civic education (Westheimer & Kahne, 2003, pp. 9–10), but my analysis of toleration shows that teaching participation should be a priority.

The class on cultural and religious perspectives could address the fourth objective: to provide students with a basic understanding of other worldviews. The literature contains theoretical (see Dewey, 1916/2007, p. 22) and empirical arguments (see Brundidge & Rice, 2009) about the value of exposure to diversity for democracy and toleration. However, toleration does not require teachers to "cultivate a cosmopolitan outlook" (Reich, 2002, p. 184) nor an appreciation for other life modes (let alone present them as alternative truths or choices for students). Rather, students should be made aware that there are ways of life different from their own, which matter to other people and do not cause harm and therefore deserve to be tolerated by the state. This minimal understanding should provide students with a framework in which they can interpret new information about others' practices and based on which they can make evaluations of toleration.

The media studies class would train students to become critical (digital) media consumers, meeting the fifth objective. Discussions of media training are less common in civic education writing, but most information that students need in their lives to participate democratically and evaluate social practices they will receive through the media. In addition, political polarization is exacerbated by the increasing segregation of media sources and communities (Schkade, Sunstein, & Hastie, 2007; Sunstein, 2001). Students need to learn about these sources and their differences and how to filter and assess media information. As research has shown that, in contrast to the common perception, students lack critical media skills (Hargittai, 2010), such skills should be included in the curriculum (see Buckingham, 2003; Jenkins, 2006; Stoddard, 2014). A tool for the development of such a curriculum is, for example, Project Look Sharp (www.projectlooksharp.org). Whereas digital media literacy education is found to encourage students to participate politically online (Kahne, Lee, & Feezell, 2012), (digital) media literacy is essential for online and offline participation (though research shows that online also stimulates offline participation, see Mossberger, Tolbert, & McNeal, 2008; Shah, McLeod, & Lee, 2009).

In teaching these objectives, there is a distinction between core knowledge and interactions with others. Core knowledge seems straightforward: the government class should teach how liberal democracy functions; how legislation is proposed, debated, and passed; what the participatory access points are, how laws are reviewed and overturned by courts, and how laws determine what is tolerated in society. The cultural and religious perspectives class should provide a survey of major religions, like Christianity, Islam, and Hinduism, but also atheism and agnosticism, and the reasons for their views on issues like abortion, euthanasia, and same-sex marriage. The media studies class should focus on institutional structures and incentives of media organizations, ideological differences between news outlets, and how selection and framing of news affects its reception.

Building on this core knowledge, the teaching would emphasize interactional learning. The main skill that toleration demands of citizens is democratic deliberation, and the best way to teach this seems to let students deliberate in a democratic manner. This idea is supported by research that shows that the most effective civics teaching occurs through classes that are discussion-based, not

between teacher and students but among students, so that each student gains experience in expressing herself politically and dealing with other perspectives (see Hess, 2002, pp. 11, 36–37; Hess & McAvoy, 2015, pp. 52–57). The government class should include simulations in which students represent their views in moot parliaments and courts (see Avery, 2001; on the proven effectiveness but rare implementation of such simulations, see Kahne, Rodriguez, Smith, & Thiede, 2000; Kahne & Westheimer, 2003; Kahne, Chi, & Middaugh, 2006, p. 402–403) and debate how laws or verdicts would modify the state's toleration of the religious practices of its citizens. Students could use examples from the news that might apply to their school environment. For example, following the effort of the Dutch liberal parties D66 and VVD to remove the official (Christian) Sunday resting day (NRC, 2016b) and the request from primary school students in Amsterdam to make Sugar Festival an official school holiday (NRC, 2016a), students could discuss whether the school should create flexible timetables that would enable students to take off days that carry meaning within their life modes. It is acceptable and even beneficial if students represent personal worldviews in simulations: it makes simulations less threatening by avoiding the need for students to take stands against their life modes and prepares them for reality in which they will also have to represent their life modes democratically. In addition, research suggests that an appeal to students' interests makes simulations more relevant, which in turn improves their participation outcomes (see Kahne, Chi, & Middaugh, 2006, p. 402).

As many schools have a homogenous student population, classes should be encouraged to participate in (inter)national simulations, such as the Model European Parliament or Capitol Forum, in which students encounter peers with other life modes with whom to debate questions of toleration. In addition, like-minded schools can focus on the nuances of opinions within, for example, Christianity or Islam (see Hess & McAvoy, 2015, p. 115). Like-minded schools should also seek other ways for students to experience diversity. The cultural and religious perspectives class could use literature (Hess & McAvoy, 2015, p. 144; Nussbaum, 1998, p. 111); films (Hess & McAvoy, 2015, p. 115); or photographs (Lintner, 2005) as ways to show students other perspectives and highlight other worldviews in historically or geographically removed contexts (see Avery, 2001; Dewey, 1916/2007, p. 163). Invited guest speakers from other religions could present their perspective on controversies like abortion (see Finlay, 2007, p. 488; Hess & McAvoy, 2015, p. 117). The internet increasingly offers opportunities like civic games for students to engage with other viewpoints and their adherents. Unlike other forms of civic participation, such online opportunities are more equally available to all students (see Afsari-Mamagani, 2014; Kahne, Lee, & Feezell, 2012; Kahne, Middaugh, & Evans, 2008; Lenhart et al., 2008).

Finally, teaching for toleration supports the idea of an open classroom environment in which students feel free to express their views (Hahn, 1998; Torney-Purta, Lehmann, Oswald, & Schultz, 2001), and supports a school culture, or "hidden curriculum," that fosters skills necessary for democratic deliberation about questions of common interest (Çubukcu, 2012; De Groof, Elchardus, Franck,

& Kavadias, 2010, p. 24; Dewey, 1916/2007, pp. 34–35, 155, 252, 262–263; Levinson, 2013, p. 12; Meier, 2003). School is the perfect place to teach mutual public respect, as school is an example of an institution that enforces public equality. School uniforms could help to accentuate this equality, as they signal to students that, regardless of their life modes, once they enter the schoolhouse, they are all equal fellow students. A student government (see Theisen, 2002), newspaper, and court (which three Amsterdam high schools are experimenting with, Volkskrant, 2016) could promote political participation. Students should be given the responsibility to discuss rules that determine how the school functions and which behaviors should be (dis)allowed—what they democratically decide is tolerable and intolerable in the school society.

Whereas practices of civic education are mixed, with, for example, digital media training being widespread (Kahne, Lee, & Feezell, 2012, pp. 11, 13) but political discussions being rare (Kahne, Rodriguez, Smith, & Thiede, 2000; Nystrand, Wu, Gamoran, Zeiser, & Long, 2003), my analysis of toleration has strengthened the argument that liberal democracy requires more rigorous civic education (e.g., Westheimer & Kahne, 2003, p. 12). The challenge for empirical research will be to understand how educators can balance teaching a way of life with engaging students minimally with other worldviews. The study of Hess and McAvoy (2015, pp. 133–144) of a teacher who taught minimal critical thinking and diversity from within the Christian worldview provides an example for such research.

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