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Encountering religious diversity: multilevel governance of Islamic education in Finland and Ireland

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Abstract
Recent decades have witnessed a change in European governments' policies from benign neglect to active management of religious diversity, where Islam is often seen as the most challenging religion for the European social order. However, the ways in which this 'management' is justified and undertaken varies from country to country and depends on the situation at hand. This paper will take up the issue of Islamic education in Finland and Ireland, where it is incorporated into the public school system with the state taking an active role in order to control how Islam is taught. The main argument of this article is that the 'management' of Islamic education in both of these countries is ridden with contradictions arising from the difficulty of balancing between an emphasis on particular national traditions, on the one hand, and public policies concerning religious diversity, on the other. Theoretically, the article will employ the perspective of multilevel governance in relation to religious diversity, which helps to widen the analytical lens from regarding the state as a primary explanatory factor to examining different agents of the civil society.

Keywords Multilevel governance · Religious diversity · Islamic education · Finland · Republic of Ireland

1 Introduction

Recent decades have witnessed a change in European governments' policies from benign neglect to active management of religious diversity, where Islam is often seen as one of the most challenging religions for the European social order (Laurence 2012) and Muslims are regarded as a 'policy problem' to be 'managed' (Koenig 2007). One form of this 'management' is the integration of Islam into the mainstream system of school education (Jozsa 2007; see also Miedema 2007, p. 270). At the same time, it seems that European countries are increasingly demanding loyalty of their citizens to the nation-state and its core values, and education is one of the most important means to uphold these values (Himanen 2012). Hence, to use the metaphor of a scale, what European states are faced with is a balancing

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act between growing religious diversity, on the one hand, and upholding historically national traditions, on the other. In this balancing act, state-funded schools, as a microcosm of society, are important social sites where the role of religion has in recent decades become a pressing issue. For the time being, the trend of increasing religious diversity and the emergence of religion as a security issue will keep religion on the agenda of state-funded education (see Van Arragon and Beaman 2015; Jozsa 2007).

With respect to the role of religion in education, this paper will take up the topic of Islamic education in Finland and the Republic of Ireland, which to date have garnered far less attention than some other European countries (see, e.g., Jozsa 2007). In both countries, Islamic education is incorporated into the state-supported school system, so that in Finland Islam is taught as one of the school subjects and in Ireland it is taught in Islamic schools. Thus, in both countries, albeit within different educational systems, the state has taken an active role in order to monitor and control Islam in the field of education (Sakaranaho 2006; Sakaranaho and Martikainen 2015; see also Rissanen and Sai 2018). In line with an argument posed by Willaime (2007, pp. 62–64), both of these countries evidence openness for growing religious diversity while at the same time they aim at integrating religious education (RE) with the overall educational aims of the school, as explicated in national curricula. As noted by Willaime, this parallel aim, which seeks to address religious diversity while holding to certain national ideals concerning school education, easily leads to tensions and debates about the role of religion in education but also in society at large. Moreover, these tensions often revolve around Islam (Willaime 2007, p. 64; see also Miedema 2007, pp. 269–270; Van Arragon and Beaman 2015).

Finland and Ireland are no exceptions to this. As a result of globalisation, there are people in EU countries such as Finland and Ireland who represent religious traditions which have no historical lineage in the country and do not necessarily fit into the institutional structure that has been established through interaction between the state and a dominant Christian church. When looking at the cases of Finland and Ireland, it is obvious that Christian institutional structures constitute, explicitly or implicitly, a normative model for the organisation of religions. Hence, religious communities which are new to the country need to fit in one way or another into the relations between the church and state as they have historically evolved. The institutional necessities and benefits that can be drawn from these relations are obvious in the way that Islamic education is organised and managed in Finland and Ireland. However, in order to get a fuller picture of the ways in which Islamic education is organised in these respective countries, it is important not only to focus on the institutional factors but also to look at Islamic education in practice (Sakaranaho and Martikainen 2015; see Fetzer and Soper 2005).

Consequently, this article will inquire how Islamic education in Finland and Ireland is incorporated into the existing church and state structures, and what kinds of challenges have arisen in relation to Islamic education in these countries. The aim of this article is not to draw a comparison between Finland and Ireland (see Bråten 2013), but rather use them as an example to highlight some issues that societies face when they have been perceived as—and still, to a large extent, are—culturally and ethnically very homogenous, but due to immigration need to come to terms with growing religious diversity.

In the process, religion has become a public issue to be managed in one way or another. In order to theorise what this 'management' is about, there is a growing body of literature that employs the perspective of governance, and this article will follow suit. Hence, in the following, I will first outline the theoretical understanding of the article; second, I will look at the legal issues pertaining to Islamic education in Finland and Ireland; and third, I will discuss some main challenges concerning Islamic education in the respective countries. In so doing, I

will make observations about the challenges concerning the different configurations of Islam and education. Employing the theoretical strategy of multilevel governance can lead to surprising findings, as this article will show in its conclusions.

2 Religion, education and the approach of multilevel governance

As noted above, in Finland and Ireland the state has taken an active role in the field of Islamic education: Islam is taught as a regular school subject in Finnish schools and there are two Muslim primary schools in Ireland. Consequently, one cannot overlook the role of the state in the management of religious diversity. This said, however, it must be noted that in contemporary studies of religion in the public sphere, there has been a move from a narrow understanding of 'government' to a broader view of 'governance' in order to understand the changing power relations in Western state structures, and this is also increasingly noted in the study of Islam in Europe (Bader 2007; Maussen 2007; Martikainen 2007, 2013; Sakaranaho and Martikainen 2015; Sakaranaho 2015).

In brief, a focus on 'government' entails an understanding which emphasises the importance of the state as a primary explanatory factor (see Bell and Hindmoor 2009). This mainly concerns action and coordination between the state and social factors through a public hierarchy consisting of laws, rules and regulations (Bader 2007). With respect to religion and education, the state-centric processes of governance concern national constitutions and laws on religious freedom which directly address religious rights. In turn, the official parameters of education are covered in different educational acts and overall regulations, such as a national syllabus for primary and secondary education in state-supported schools.

The perspective of 'governance' is consequently linked with the process of intensified globalisation and the emergence of new forms of public management in 'the age of neoliberalism', in which the state is increasingly seen to rely on different agents of the civil society in its encounters with social, cultural and religious diversity. In addition to formal processes initiated by the state, the perspective of governance takes into account matters outside the direct influence of the state, and hence it pays attention to what takes place in practice. Attention to these state-centric and practical processes of governance creates the opportunity for deeper analysis, which goes beyond the study of formal legal arrangements and also looks at the various processes of implementation (Martikainen 2013; Sakaranaho and Martikainen 2015; Sakaranaho 2015).

With respect to religious rights and education, the approach of multilevel governance widens the perspective from laws and national regulation concerning religion in education to such questions as how the rights of religious communities are implemented in practice (in teaching, for instance). In sum, focusing on the governance of religion in education on different hierarchical levels is important when studying the relations between 'normative models of appropriate institutions and policies and "what is going on on the ground"' (Bader 2007).

3 State, religion and education

Both Finland and Ireland are small countries on the fringes of Europe, where the effects of immigration to Europe after the Second World War were felt rather late in comparison to other European countries, such as France, Britain and Germany. Until the 1990s, both Finland and Ireland were countries of emigration rather than immigration. In recent decades,

however, the situation has changed and both countries are now receiving immigrants in numbers that they would not have anticipated prior to the 1990s. This change notwithstanding, compared to other European countries, the numbers involved are still rather small. For instance, of the estimated 19 million Muslims in the EU, there are around 70,000 Muslims both in Finland and in the Republic of Ireland. This said, however, it must be noted that the numbers do not tell the whole story. Both Finland and Ireland have been on a steep policy-learning curve for the past decades in order to accommodate the growing religious and cultural diversity in their countries. Different programs of the immigration and integration are but one example of this process.

With respect to religion, both countries have a majority church (i.e. the Evangelical Lutheran Church in Finland and the Roman Catholic Church in Ireland), which has exerted significant influence on the state and, in spite of rapid social change, still does so, at least to some extent. Hence, in both countries there are long-standing legacies of relations between church and state that have a bearing on state policies concerning education and other areas of society (see Willaime 2007).

Even though their legal arrangements of church and state relations differ, both Finland and Ireland have opted for a policy with respect to religious diversity that aims to secure the status quo of a dominant (national) church while also extending to religious minorities some of the legal privileges enjoyed by it (Seppo 2003; Sakaranaho 2006; see also Sakaranaho and Martikainen 2015). It also informs the way that Islamic education is formally organised and practically managed in the respective countries. Consequently, it is necessary to pay attention to the ways that the management of Islamic education in Finland and Ireland reflects the hierarchical, top-down model of governance traditionally associated with the historical relations between church and state.

3.1 Varieties of religious education in Finland

According to the Constitution of Finland (*Suomen perustuslaki*), 'Everyone is equal before the law', and no one should be treated differently from other persons on the ground of religion and conviction, among other things. With respect to religious freedom, Section Eleven (11 §) of the Constitution states the right to religious belief, practice and belonging, whereby belonging is explicated as membership in a religious community (Constitution of Finland 731/1999, 2011). Thus, regarding the manifestation of one's religion in a community with others, the law seems to reiterate the understanding of religious belonging as a membership, which undoubtedly is characteristic of the national churches in Finland and other Nordic countries. However, membership as a mode of religious belonging is not necessarily customary in all religions, of which Muslims constitute one clear example; less than 15% of Muslims have membership in one of the registered Islamic communities in Finland (Pauha and Martikainen 2014). In this respect, the law rearticulates an established Lutheran model of religious belonging and fails to reflect the multi-faith scene of Finnish society (see Sakaranaho 2006, p. 129ff). The same can be said about religious education.

The current Freedom of Religion Act (*Uskonnonvapauslaki* 453/2003) grants children belonging to different religious communities the right to receive 'education in accordance with their own religion' (*oman uskonnon opetus*) as a part of the school curriculum. Moreover, the right for religious education has been passed separately in the Basic Education Act (*Peruskoululaki* 454/2003) and in the Upper-Secondary Education Act (*Lukiolaki* 455/2003), which state that the comprehensive schools (i.e. the primary school (*alakoulu*) and the secondary school (*yläkoulu*)), as well as the upper-secondary school (*lukio*), are

obliged to provide their pupils and students with religious education or education in ethics, respectively, as a part of the school curriculum.

Even though religious education in Finland is divided according to religious traditions—and hence is 'separative' (Alberts 2007), 'pluralist monoreligious' (Ubani 2013) or 'single-faith' (Rissanen 2014)—it should not be confessional, serving the purposes of a religious community, nor should it include religious practice (Sakaranaho 2013). The move away from confessional to non-confessional religious education in Finland took place gradually over the decades as the linkage between the Lutheran Church and school education was severed and religious education was put on the same footing as other school subjects, with their contents being dictated by the aims of the comprehensive school (Seine 2000). Thus, the current model of religious education is a result of a particular kind of historical process that has, in principle, concerned Lutheran RE. It is currently a model that other religious communities also need to comply with, irrespective of their views and needs (Sakaranaho and Salmenkivi 2009).

In any case, in accordance with the Basic Education Act (2003) and that of the Upper-Secondary Education Act (2003), the organisers of comprehensive and upper-secondary education, i.e. municipalities (see Ubani 2013) are first obliged to arrange the religious education of the majority. Since around 70% of Finnish people are members of the Lutheran Church, in practice it is Lutheran religious education which is predominant in Finnish schools. Due to the smaller memberships of other faith communities, it is hard to see any non-Lutheran religious community reaching a majority in Finland in the foreseeable future.

The reification of the Lutheran education is further pronounced in that pupils belonging to the Lutheran Church do not only have a right to participate in the education of their religion but are obliged to do so. In addition, pupils belonging to some other religious community, or no religious community at all, are allowed, if their parents so wish, to participate in Lutheran RE. In this respect, by curtailing the freedom of choice of the Lutheran pupils, the law would seem to discriminate against the members of the majority religion (see Scheinin 2001; Sakaranaho 2006, pp. 358–350).

In contrast to other minority religions, municipalities are obliged to arrange Orthodox RE as soon as they have three Orthodox pupils or students, and no request from the parents or students is needed. For members of religious communities other than those of the Lutheran or Orthodox faiths, religious education should be organised if there are three pupils or students in the area of a municipality belonging to a particular registered religious community and if the parents of these pupils (in the case of comprehensive schools) or the students themselves (in the case of upper-secondary school) request it. Thus, in contrast to the compulsory aspect of Lutheran RE, the education of the minority religions, other than that of the Orthodox Church, is distinctively voluntary and, at least in principle, left to the discretion of the parents or students themselves.

In addition to religious education, municipalities are also obliged to organise education of ethics for those pupils who are not members of any religious community and who do not participate in Lutheran RE. The minimum requirement of pupils is three, but the request of parents is required only in cases where a pupil is a member of a religious community but the municipality does not organise education in her or his religion. Therefore, the education of ethics is on the same standing as Orthodox RE.

Looking at these provisions, it is obvious that they base the right for religious education first and foremost on religious community membership (Sakaranaho 2013; see Seppo 2003, p. 179). In so doing, they clearly reflect the general conception of religious affiliation in Finland, which does not primarily concern believing or behaving in a certain way, but

instead involves membership in the Finnish Lutheran Church—something that is more or less taken for granted in Finland. However, the emphasis on membership can prove to be problematic for adherents of religions which are not organised in line with registered membership. This was voiced by different Christian and Muslim communities in their criticism of the current Freedom of Religion Act (2003). In their view, the Act reiterates dominant language of religious belonging and constructs the Lutheran model as a norm that other religious communities need to comply with (Sakaranaho 2006). From the pupils' point of view, the emphasis on membership in a particular religious community also seems outdated when taking into consideration that their commitment to a particular institutional membership is decreasing and, in line with a general trend in Finland, they tend to have more fluid worldviews, including elements from different religious traditions or no religion at all (Kuusisto and Kallioniemi 2017; see also Nynäs et al. 2015).

In any event, fostering plurality of religious education is seen from the state's point of view as a benevolent gesture of recognition towards different religious communities. As a result of growing religious pluralism in Finland, the number of pupils availing themselves of the right to education of different religions at school is increasing rapidly (Sakaranaho and Salmenkivi 2009; Ubani 2013). Islamic RE started in Helsinki in the middle of the 1980s. The first and only teacher at the time was an imam from the Tatar community. At this stage, there were only a handful of Muslim pupils, who were gathered from different schools. Since 1994, a second teacher was employed to teach Islamic RE, and he circulated between three schools, with a few pupils in each of them. In the other cities of the Helsinki metropolitan area, Islamic RE started after the middle of the 1990s, when the overall number of Muslims began to grow rapidly (see Sakaranaho 2006; Onniselkä 2011; Rissanen 2014, pp. 35–37).

Unlike in many other European countries, in Finland no ethnic group of Muslims dominates the communities living in the country. Thus, in addition to being a rather small number, Muslims in Finland constitute a very heterogeneous population with various ethnic, linguistic and religious affiliations (Pauha and Martikainen 2014). The diversity of Muslims notwithstanding, only one type of Islam—a general sort of Islam suited for both Sunni and Shia adherents – is taught in Finnish schools. However, in regard to actual teaching it is the Sunni interpretation of Islam that tends to dominate (Rissanen and Sai 2018). Thus, the law acknowledges the right of Muslims to have Islamic RE as part of their school curriculum, but it does not recognise the religious diversity of Muslims following different traditions. This in itself is an example of the limits of the model of extended privileges mentioned above and the sort of discrimination they can produce.

3.2 Denominational schools in Ireland

The Constitution of Ireland (*Bunreacht na hÉireann*) is very different from the Finnish constitution in that it starts with a preamble that honours the Most Holy Trinity and acknowledges the obligation of the Irish people to the Divine Lord, Jesus Christ. At the same time, Article 3 of the Constitution states that the aim of the Irish nation is 'to unite all the people who share the territory of the island of Ireland, in all the diversity of their identities and traditions', and that this unity can be brought about by 'peaceful means with the consent of the majority of the people'. In similar fashion to the Finnish constitution, Article 40 of the Irish constitution states that all citizens 'shall be held as equal before the law'. Article 44, on freedom of religion, reiterates the religious language of the preamble by starting with a reference to Almighty God and to the obligation of the state to respect and honour religion

in Ireland. It then goes on to say, 'The State guarantees not to endow any religion' (Article 44.2, Constitution of Ireland 1937).

The aim 'not to endow any religion' is articulated in a provision of Article 44, which states that, with respect to providing state aid for schools, legislation 'shall not discriminate between schools under the management of different religious denominations, nor be such as to affect prejudicially the right of any child to attend a school receiving public money without attending religious instruction at that school'. Moreover, it states, 'Every religious denomination shall have the right to manage its own affairs, own, acquire and administer property, movable and immovable, and maintain institutions for religious or charitable purposes.' (Article 44.2, Constitution of Ireland 1937). This is iterated also in *The Rules for National Schools* (1965, p. 9), which declares that 'these Rules do not discriminate between schools under the management of different religious denominations'. A denominational school system is also strengthened by the Irish Education Act (1999), which allows and even requires 'upholding the characteristic spirit of the school', which is determined by religious values and traditions, among other things (Mawhinney 2015; Sai 2018).

Even though the denominational school system in Ireland provokes heated debate (see Murray 2008; Hogan 2011), for the time being at least it has firm roots in the Constitution of Ireland and hence in practice. The role of the state is to provide premises and sufficient finances for schools, while the schools are managed and run by trustees. Moreover, a similar arrangement also concerns teachers, who are paid by the state but have a contract with school trustees. With respect to these trustees, the vast majority of schools are owned or managed by Catholic parishes or religious orders, serving 90% of the primary school pupils. In addition, there are some schools controlled by Protestant churches and a few schools run by other religious communities (e.g. Jewish and Muslim), as well as a growing number of multidenominational primary schools (Sakaranaho 2015; Mawhinney 2015; Hyland and Bocking 2016).

The denominational system of education in Ireland has ensured that different religious communities, in addition to the Catholic majority, have been able to socialise children in their respective religious traditions. Therefore, it is not surprising that the start of the first Muslim primary school in Ireland went rather smoothly. It was recognised by the state, being officially opened in April 1993 by the President of Ireland, Mrs Mary Robinson. The second Muslim primary school started without much publicity in September 2001, and thus today there are two Muslim primary schools in Dublin. Both of these schools are run under the patronage of the Islamic Foundation of Ireland (IFI) and have school boards with representatives of Muslim parents. The principals and teachers of both schools, excluding the teachers of Islam and Arabic, are non-Muslim (Islamic Foundation of Ireland; Sakaranaho 2015; Sai 2018).

However, a recent report on education and anti-racism in Ireland has pointed out that the Irish system of education is failing to sufficiently address the needs of families who are not Catholic. The present situation, where most schools are under the ownership and management of the Catholic Church, and where only one per cent of schools are multidenominational, leaves very little choice for parents with respect to their children's education (O'Loinsigh 2001). This is especially true for the Muslim community, as its children have a very limited opportunity to receive an Islamic education, taking into consideration that only two primary schools exist in the country and both of them are in Dublin. Consequently, most Muslim children are educated in Catholic schools and some in Protestant schools. Contrary to Finland, schools in Ireland are only obliged to give religious education that accords with their own religious ethos. Therefore, Muslim children are forced to attend Catholic RE or are withdrawn from it by their parents, using their constitutional right to do

so (Cullen 2005; Sakaranaho 2015; Mawhinney 2015; Hyland and Bocking 2016; Shanneik 2016). Moreover, for Muslim pupils attending non-Muslim schools, facilities and time for prayer are not necessarily granted (Sai 2018, p. 9).

Another issue that can be problematic from the point of view of Muslim pupils is that a school's particular ethos is fostered by an integrated curriculum, where religion is taught not simply as a separate subject but as a part of the entire school curriculum. In other words, the particular religious ethos is supposed to permeate the entire school community and inform all the subjects taught in school, as well as its social and cultural activities (Mawhinney 2015). This is apparent, for instance, in the preparation for the First Holy Communion, which is undertaken during school hours (Shanneik 2016). Consequently, a more general question remains as to how the Irish majority schools will, in accordance with the Education Act (1998), accommodate the religious and cultural needs of their pupils and deal with the consequent 'implications for these schools in terms of change in management structures, in terms of change in ethos and in terms of the resourcing of these schools' (O'Loinsigh 2001). A further obstacle that Muslims face in Ireland is admission to secondary school. In particular, Muslim girls have experienced problems around being admitted to (Catholic) secondary schools on the grounds that wearing an Islamic head scarf (*hijab*) violates their Catholic ethos (McGarry 2000; Sakaranaho 2015).

In sum, one may note that the governance of religious education in Ireland in accordance with the model of extended privileges, whereby the status quo of the Catholic schools remains intact but where the denominational school system ensures for religious minorities the right to run schools in accordance with their religious ethos, has serious limitations and, even more importantly, in a sense makes it redundant to address topical issues concerning religious diversity in Irish schools in general.

4 Islamic education in practice

4.1 Teaching Islamic RE in Finland

Since Islam is such a new subject in Finnish schools, it has not, naturally enough, been established in the same manner as Lutheran RE, where teacher education is organised by three different universities and textbooks and teacher guides abound. Due to being such a recent subject, Islamic RE is also more disadvantaged in comparison with the education of Orthodox and Catholic RE, as both of these religions have clear institutional ties with their respective churches. With regard to teacher education, Orthodox teachers are trained at the University of Eastern Finland and Catholic teachers at the University of Helsinki. With respect to the latter, the Catechetic Centre of the Catholic Church in Helsinki gives support to its own teachers and also helps to produce textbooks for Catholic RE. Islamic education does not enjoy such direct institutional benefits (Sakaranaho 2006).

In order to provide teachers of Islam with formal qualifications, in 2007 the University of Helsinki started teacher education in Islamic RE. However, it has managed to attract very few students. This is surprising, given that according to a survey conducted among teachers of Islamic RE in 2004, most expressed interest in training that would qualify them as competent RE teachers. Due to a lack of formal qualifications, teachers of Islam have earned a minimum salary, and this was a problem recognised both by teachers and municipalities alike (Sakaranaho and Jamisto 2007).

Although there may be many reasons for low enrolment in teacher education of Islamic RE, one can mention at least three that have come up in discussions with teachers. In order to qualify as a teacher of religion in a Finnish comprehensive and upper-secondary school, a person needs, unlike in many other European countries, to have a Master's degree, including a certain number of studies in the chosen school subject, coupled with pedagogical studies. In addition, one must have the highest level of proficiency of Finnish language, which is documented by taking a Finnish matriculation exam or a particular language test, organised by the Finnish National Agency for Education. On the main, teachers of Islam come from a range of other countries, such as Somalia, Egypt, Morocco and so forth. Their level of education varies greatly; while all of them have some training in their home country, only very few have a university degree in Finland. Even for a teacher who has received Master's degree in Finland, the language test can be a huge barrier (see Onniselkä 2011). In this respect, the teacher requirements clearly reflect the model of a teacher who has gone through the Finnish school system and has near-perfect Finnish. In practice, this is the case for all Lutheran RE teachers and most Orthodox and Catholic RE ones. The current system does not show much tolerance for cultural and linguistic diversity.

In addition to a lack of sufficient education and language skills, there is a very practical reason for teachers of Islamic RE to not attend teacher education. Teaching Islamic RE is very demanding. Since any given school offers only one or two hours of religious education per week, teachers of Islamic (and other minority) RE are compelled to circulate between numerous locations in order to work a full-time schedule. In some cases, this also concerns teachers of Lutheran RE, but whereas they might have to commute between two or three schools at the most, teachers of Islam may have fifteen schools on their list. Consequently, they often have no school as a base and are not necessarily informed in time about changes in school hours (Sakaranaho 2006).

In addition to the trying conditions concerning teaching in general, the students that teachers of Islam encounter in their work are extremely heterogeneous. As is the case with Muslims in Finland in general, Muslim pupils come from many different countries in North Africa, the Middle East and Asia; alternatively, some have arrived in Finland as refugees from Somalia, Kosovo and Albania. Therefore, Muslim pupils represent different ethnicities and speak many different languages. Often the only language in common between teachers and their pupils is Finnish, which is also officially the main language used in class. In addition to ethnicity and language, pupils from different countries also vary due to their religious upbringing and, based on this, the amount of knowledge they might have about Islam. As one teacher pointed out, a first-year pupil from Somalia might know more about Islam than a fifth-year pupil from Kosovo (Sakaranaho 2006; Onniselkä 2011).

The heterogeneity of Muslim pupils notwithstanding, they often attend the same Islam class. The reason for this arrangement is the lack of sufficient numbers of Muslim pupils in the different year-levels. In order to have a full class, pupils from different year-levels are collected together. Consequently, teachers have to align their teaching to address the needs of pupils with different levels of competence. When teaching pupils from different grades, it is hard for a teacher to follow the Curriculum of Islam with detailed aims for each grade. This discrepancy between the principles of Islamic RE (curriculum) and the harsh reality of the classroom can be very trying for teachers. To some extent, new textbooks recently made available by the Finnish National Agency for Education help in teaching different grades of pupils (Salam—islamin polku 2013–2016).

In the aftermath of the recent Freedom of Religion Act (2003) teachers of Islam also face a change in the law that teachers of religion no longer need to be members of a registered religious community or the religion they teach. According to this line of thought,

training and qualification as a teacher guarantees a teacher's ability to teach religious traditions other than one's own. The change in the law is, of course, congruent with the policy of separating religious education in schools from that of religious communities. Consequently, the same teacher can teach different religions and secular ethics, provided that she or he has enough studies in the subject. In recent years, more and more non-Muslim teachers have qualified as teachers of Islamic RE and, due to their formal qualifications, are stronger candidates for teaching positions of RE. With respect to teachers of RE, the current system favours Finns who have gone through the Finnish school system and are native Finnish (or Swedish) speakers.

Some Muslim parents have expressed a concern for non-Muslim teachers not having enough knowledge and understanding of Islam but, for better or worse, they have no legal grounds for their complaints (Onniselkä 2011; see also Rissanen and Sai 2018, pp. 8–9). All in all, there is an interesting discrepancy in the current system, where teachers of RE are not expected to be members of a religious community—and, hence, can teach any religion—but pupils attending their teaching are divided in terms of their membership in a religious community.

4.2 Guidelines of teaching in Muslim national schools in Ireland

As mentioned above, starting a Muslim primary school in Ireland went rather smoothly two and a half decades ago and today there are two well-established Muslim primary schools in Dublin. In that sense, the 'Catholic legacy' of ensuring religious communities the right to administer their own schools has worked well for Muslims in Ireland. However, their religious ethos notwithstanding, schools should follow an overall curriculum designed for primary schools by the Department of Education and Skills (Sakaranaho 2015).

In practice, schools are governed by a school board consisting of the patron, principal and parents, where the principal is in charge of the daily management of the school. However, a survey undertaken by the Irish Primary Principals Network (IPPN) showed that 'many Principals have a challenging relationship with their Boards of Management' and that 'most Boards do not understand where their role finishes and the Principal's role begins' (Cottrell 2008). As shown in the Whole School Evaluation (WSE) conducted by the Department of Education and Skills (Whole School Evaluation 2005), similar problems have been noted in both of the Muslim primary schools in Dublin (Sakaranaho 2015).

The Whole School Evaluation Report (2005) on the Clonskeagh Muslim National School positively assessed its in-school management, the professionalism of the principal, the teachers and school staff in their work, and their commitment to the ongoing development of the school. With respect to pupils, the report was very positive about their engagement in the learning process, and it also noted that the school took the different cultural backgrounds of pupils into consideration. Finally, the evaluation report also noted that the school was doing very good work regarding many areas of the curriculum, so that pupils were provided with a wide range of abilities (Whole School Evaluation Report 2005). However, it reflected negatively on the fact that some parents were opposed to the teaching of some aspects of music, history and physical education as being contrary to their Islamic faith. In addition, there were Muslim parents who thought that a Muslim primary school should not have a non-Muslim as principal (Reilly 2009).

In its report, the Department of Education recommended that a minority of parents should not have a decisive role in the governance of the Muslim primary schools. Instead, it advised that the board should ascertain that, even though a school might follow the ethos

of Islam, the school curriculum entirely fulfilled the requirements of the national curriculum. The Department of Education did not see this as infringing on the parental right of choice regarding their children's education, which is granted by the constitution of Ireland. In its view, parents could always decide not to enrol their children in this particular school (Whole School Evaluation Report 2005).

Whatever the case may be, opting out and changing schools is easier said than done when taking into consideration that there are only two Muslim primary schools in Ireland, both of which are supported by the state and need to follow the overall primary school curriculum. In other words, in principle parents have the constitutional right to decide on their children's education in accordance with their faith but in practice their educational choices are limited by state policies implemented from the top down (see Mawhinney 2015; Sakaranaho 2015). Moreover, this example illustrates how the government demands adherence to the national values of state-supported schools, irrespective of their religious ethos. In a similar fashion to Finland, it also highlights the difficulties in coming to terms with religious diversity among Muslims (see Sai 2018).

In addition to challenges concerning the implementation of the national curriculum, Muslim primary schools also face the question of how they can advance the Islamic ethos that they are aiming to uphold in teaching. In his recent study on the above-mentioned schools, Sai draws attention to the various ways that the Islamic ethos is understood by Muslims involved with those schools. He also points out that, with respect to the Islamic ethos of the schools, there is a gap between what is intended and what takes place 'on the ground'. In his view, Muslim primary schools should not intend to be 'like every other school' (Sai 2018).

It is not clear how this could be accomplished, especially when one takes into consideration that Muslim primary schools are to a large extent funded by the Irish state and that the Department of Education takes an active role in the governance of the curriculum of these schools, and with the help of Whole School Evaluation reports it also aims to control what is taught in class (see Hyland and Bocking 2016, p. 123). Moreover, the schools are headed by principals and most of the subjects taught by non-Muslims who do not personally subscribe to the Islamic ethos. Here one should also keep in mind that the education of primary teachers in Ireland is provided by publicly funded colleges, most of which are owned and controlled by the Catholic Church (Hyland and Bocking 2016, p. 129).

The fact that non-Muslims have such a central role in the management and teaching of Muslim national schools has been criticised by some parents, as mentioned above, but, due to a lack of competent principals and subject teachers who follow Islam, for the time being there is no expected change in this state of affairs.

5 Concluding remarks

This article took up two examples where a European state manages Islam in the field of education by incorporating Islamic education into the state-supported school system. In Finland, it is done as part of religious education and in Ireland as a part of the denominational school system. Both of these states emphasise the equality of all members of society, irrespective of their religion, and in general show benevolence towards the religious diversity that these societies have been facing to an ever-growing extent since the 1990s.

However, developing policies in relation to religious diversity is a very complicated issue. It requires a sort of balancing act between requirements arising from age-old national

traditions, on the one hand, and from the growing religious diversity, on the other. From the perspective of multilevel governance, the cases of Islamic education in Finland and Ireland readily illustrate that there are clear discrepancies between education in practice and the official rhetoric of equality and educational rights. Both Finland and Ireland follow the 'model of extended privileges' (Sakaranaho 2006), whereby the establishment remains intact while some privileges are also granted to religious minorities. However, while this kind of top-down, hierarchical way of governing Islamic education in Finland and Ireland may serve the national interests in terms of uniformity and social cohesion, it is not truly sensitive to religious diversity, seeing Muslims as a kind of unitary whole rather than as a collection of people with a variety of views about Islam and life in general (see Sakaranaho 2015, pp. 182–183).

Surprisingly enough, there is another observation that one can make concerning how Islamic education is governed in Finland and Ireland. This is related to teaching itself. As a result of the legal changes in Finland, in order to teach a particular religion a teacher does not need to be a member of a registered religious community representing that religion, and this has led to an increase in the number of non-Muslim students undertaking education as teachers of Islam. In addition, the current requirements of being a fully qualified RE teacher favour those who have gone through the mainstream Finnish school system and have proficiency in Finnish (or Swedish) language; for the most part, these students are non-Muslims. In Ireland, founding Islamic schools was aided by the legal backing of the educational rights of religious communities, but in practice the running of Muslim primary schools is in the hands of non-Muslim principals and school subjects other than Arabic and Islam are taught by native Irish who, in most cases, have a Catholic background; furthermore, primary teachers are educated in colleges run by the Catholic Church.

Hence, the effort to encompass religious diversity in both Finland and Ireland has actually resulted in favouring native Finns and Irish. This is an unforeseen development, taking into consideration that the aim in Finland and Ireland has clearly been to integrate Islam and, accordingly, Muslims in the overall system of education. One reason for the outcome may be that in encountering religious diversity, both of these countries show limited sensitivity and understanding of the heterogeneity of Muslims. Perhaps the cases of Finland and Ireland are yet another example of the governance of religious diversity that has contradictory implications for the incorporation of Muslims into a European society (see Koenig 2007). As a follow-up question, one may ask how well these countries are equipped to face religious diversity in general.

From a wider perspective, the case of Islamic education in Finland and Ireland readily illustrates the accumulation of different factors arising from the historically evolved understanding of religious freedom, involving a particular kind of relation between church and state as well as a country's educational system (Berglund et al. 2016). In both countries, the educational system tends to show preference for the teaching of Christian religious traditions; however, this does not mean that the state is hostile to the values held by Muslims (see Fetzer and Soper 2005, p. 22). Due to increasing immigration, both of these countries face growing diversity, which both states acknowledge in principle and approach in a positive manner. With respect to this diversity, both cases also highlight the complexity of issues that a state has to deal with in relation to the accommodation of the religious rights of its inhabitants, including Muslims. Due to this complexity, it is not enough to focus only on top-down policies but also critical to pay attention to what is happening on the ground, as the theoretical perspective of multilevel governance readily illustrates. In general, the perspective of governance can also shed new light on research in Europe on school and religion in general, as well as Islam and education in particular.

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