

The Complexities of Neutrality in Teaching Religious Education: The Ethics and Religious Culture Program as Case Study

Le défi complexe de la neutralité dans l'enseignement de l'éducation religieuse : le cas du programme d'éthique et de culture religieuse

Arzina Zaver

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Article abstract

In 2008, the Québec Ministry of Education introduced the Ethics and Religious Culture (ERC) program. Though the ERC is a positive step forward in promoting and fostering much-needed religious literacy skills, the implications of a “neutral” professional posture asked of its teachers have been difficult to translate into the classroom. Neutrality is seen to infringe on a teacher’s sense of autonomy and authenticity. This article traces the concept of neutrality in Québec back to the state policies, showing that neutral pedagogy contradicts the ethics of religious sensitivity and religious literacy that Québec is seemingly promoting. It concludes by offering a more balanced approach to the teaching of religion in the classroom.

THE COMPLEXITIES OF NEUTRALITY IN TEACHING RELIGIOUS EDUCATION: THE ETHICS AND RELIGIOUS CULTURE PROGRAM AS CASE STUDY

ARZINA ZAVER *McGill University*

ABSTRACT. In 2008, the Québec Ministry of Education introduced the Ethics and Religious Culture (ERC) program. Though the ERC is a positive step forward in promoting and fostering much-needed religious literacy skills, the implications of a “neutral” professional posture asked of its teachers have been difficult to translate into the classroom. Neutrality is seen to infringe on a teacher’s sense of autonomy and authenticity. This article traces the concept of neutrality in Québec back to the state policies, showing that neutral pedagogy contradicts the ethics of religious sensitivity and religious literacy that Québec is seemingly promoting. It concludes by offering a more balanced approach to the teaching of religion in the classroom.

LE DÉFI COMPLEXE DE LA NEUTRALITÉ DANS L'ENSEIGNEMENT DE L'ÉDUCATION RELIGIEUSE : LE CAS DU PROGRAMME D'ÉTHIQUE ET DE CULTURE RELIGIEUSE

RÉSUMÉ. En 2008, le Ministère de l'Éducation du Québec a introduit le programme d'éthique et de culture religieuse (ECR). L'ECR constitue une évolution positive pour la promotion et l'encouragement de compétences indispensables en instruction religieuse. Cependant, tout ce qu'implique et découle de l'adoption d'une attitude professionnelle « neutre » s'avère ardu à appliquer en classe. La neutralité est perçue comme portant atteinte à l'autonomie et l'authenticité des enseignants. Cet article dépeint le concept de neutralité au Québec, allant à la source des politiques gouvernementales et démontrant que la pédagogie neutre est en contradiction avec l'éthique de sensibilités et d'éducation religieuses que Québec vise à promouvoir. Celui-ci se termine en proposant une approche plus équilibrée de l'enseignement de la religion en classe.

In 2008, the Québec Ministry of Education implemented the Ethics and Religious Culture (ERC) program, which became a mandatory course for all elementary and secondary school students in both public and private schools (Maxwell, Waddington, McDonough, Cormier, & Schwimmer, 2012). Though

this is a great step forward in increasing religious literacy¹ and combatting some of the misunderstandings around the differences in religious and cultural practice, the Ministry's outline of the role of the ERC teacher has proven to be extremely problematic in practice. In this article, I explore how the idea that ERC teachers remain neutral pedagogues in the classroom is problematic given the distance they must maintain from their own worldviews.

I begin by showing that the concept of neutrality is rooted in the history of Québec, starting with the movement towards secularism during the onset of the Quiet Revolution in the 1960s. This article explores the way in which the policy of neutrality has affected educational policies, such as the Ministère de l'Éducation, du Loisir et du Sport (MELS)² requirements of professional posture for teachers of ERC. I conclude by showing that the form of neutrality promoted by MELS is not only an extremely difficult request to make of teachers but also that it contradicts the ethics of religious sensitivity and religious literacy promoted in the Bouchard-Taylor report (Bouchard & Taylor, 2008). Instead, I recommend another variation of neutrality that respects the valid fears of indoctrination, born out of a long history of confessional religious instruction in Québec, but that still enables teachers to share their own viewpoints.

CONTEXT OF QUÉBEC

Education in Québec has had several notable turning points. Prior to the Quiet Revolution in Québec, the Catholic Church controlled many government institutions. The relationship between the Catholic Church and the British was formalized in the Québec Act of 1774. The Act granted the Church a "virtual hegemony over the lives of French Canadians" (Fenwick, 1981, p. 200), including the right for the Catholic Church to build and staff educational institutions. The diminishing role of the Catholic Church and the move towards modernity can be seen as the start of secularization in Québec through the distinct separation between Church and State.

With the Quiet Revolution in the 1960s, secularization became a priority. The Quiet Revolution began in part due to the rise of French nationalism in the 1960s and in part from the push for Québécois to be "masters of their own house" (Ghosh, 2004, p. 42). As Ghosh (2004) has noted "the Roman Catholic Church's role was greatly diminished in Québec society, resulting in a significant growth of the education system and making language, rather than religion, the distinguishing characteristic for the Québécois" (p. 58). One feature of the Quiet Revolution was the replacement of the clerical elite by the newly created Ministry of Education (Blad & Couton, 2009; Laplante, 2006). This was a deliberate attempt on the part of the Liberal government to modernize the institutions in Québec in order to make them more relevant in a newly industrialized society (Laplante, 2006).

In 1997, the Task Force Report, headed by Proulx, had further examined religious education in Quebec. Among the recommendations made, of importance here is that elementary and secondary education provide a space to study religion from a cultural perspective, and that religious instruction be mandatory for all children. This report recommended a gradual implementation of the proposals. After much discussion, debate, and counter arguments, the religious education options available (Catholic and Moral Religious Instruction, Protestant Moral Religious Instruction, and the Moral Religious Education instructions) were replaced by the mandatory Ethics and Religious Culture (ERC) program by 2008 (Boudreau, 2011).

The introduction of the ERC coincided with increases in immigration in Québec (Farmer, Ngouem, & Madibbo, 2010; Gagnon 2008). The growing diversity in Québec had given rise to discontent over the reasonable accommodation of immigrant cultural practices. Reasonable accommodation is defined as “the form of arrangement or relaxation aimed at ensuring respect for the right to equality, in particular in combating so-called indirect discrimination, which, following the strict application of an institutional standard, infringes an individual’s right to equality” (Bouchard & Taylor, 2008, p. 6). In Québec, following the “intensification in controversy” as noted by Bouchard and Taylor (2008, p. 13), there was an immense amount of criticism growing over the reasonable accommodation cases between May 2002 to February 2006. Resulting from these issues, the Québec government (through the Commission on Accommodation Practices Related to Cultural Differences) produced a report called *Building the Future: A Time for Reconciliation* authored by Bouchard and Taylor (2008). Its aims included to:

- a) Take stock of accommodation practices in Québec;
- b) Analyze the attendant issues bearing in mind the experience of other societies;
- c) Conduct an extensive consultation on this topic; and
- d) Formulate recommendations to the government to ensure that accommodation practices conform to the values of Québec society as a pluralistic, democratic, egalitarian society. (Bouchard & Taylor, 2008, p. 6)

After examining some of the more popular and contentious examples of reasonable accommodation in Québec, this report concluded by affirming the necessity for interculturalism and religious sensitivity. These conclusions further corroborated the changes in the education system in Québec and the goals of the ERC Program. The aims and goals of the report have had an impact on the way in which religious instruction should be approached in Québec and also helped shaped the overarching goals of the ERC Program.

While the aims of the ERC aspire to mediate some of the tension and misunderstanding around the various religious groups in Québec, the approach to the teaching of ERC is problematic. The ERC takes on a self-defined “de-confessionalized” approach (Ministère de l’Éducation, du Loisir et du Sport [MELS], 2008) to the teaching of religion. This concept of neutrality in education has been referred to as “pedagogical neutrality”, in which a curriculum incorporates a plurality of values and beliefs to which teachers are expected to maintain a critical distance (Noddings, 1993). This is clearly summarized by the MELS (2008) when they stated that it is important that “teachers maintain a critical distance regarding their own world-views especially with respect to their convictions, values and beliefs” (p. 12). The concept of neutrality dates back to the convoluted relationship Québec has had with maintaining a rigid separation between Church and State. However, as I will demonstrate, the concept of neutrality, especially when applied to pedagogy, is problematic. I argue that Québec’s policies of state neutrality have greatly influenced the approach of the ERC, and that this policy is counterintuitive to the aims of intercultural sensitivity and respect for diversity that the Bouchard-Taylor report highlighted.

DEFINITIONS AND APPLICATION OF NEUTRALITY

Neutrality and the State

Religion is assuming a more visible place in public life,³ prompting nation-states to adopt a posture regarding the relationship between religion and state politics. Thus, while some nation-states continue to maintain a non-secular orientation, the majority adopt a type of secular system. Martínez-Torrón and Durham (2012) noted that, among secular states, “there are a range of possible positions with respect to security, ranging from regimes with a very high commitment to secularism to more accommodationist regimes to regimes that remain committed to neutrality of the state but allow high levels of cooperation with religions” (p. 1). In understanding the nuances of the state’s orientation, many have seen it as an “either-or” debate – that is, states are either religious or secular. Martínez-Torrón and Durham (2012), however, saw two systems of belief: secularism and secularity, in which secularity can be a more “flexible or open arrangement” (p. 3).

Using the definition provided by Bouchard and Taylor (2008), state neutrality is the principle that the State must maintain a position of neutrality when faced with deep-seated moral convictions, whether they are religious or secular. During a public consultation held in the Fall of 2007, Québécois massively espoused the concept of secularism, one of the most frequently mentioned themes, but sometimes with different meanings. Bouchard and Taylor (2008) discovered that Quebec citizens typically defined a secular regime in one of two ways: as confining religion to the private sphere, or as state neutrality:

1. “religion must remain in the private sphere” was often cited by the proponents of secularism. Bouchard and Taylor state that, “according to this first meaning, it is... accurate to confirm that religion must be “private.” However, it does not go without saying that secularism demands of religion that it be absent from public space in the broad sense” (Bouchard & Taylor, 2008, p. 44).
2. Under the principle of state neutrality, “the State may not espouse all of the worldviews and deep-seated convictions of all citizens, which are numerous and sometimes hard to reconcile. However, it can promote the values that stem from them and underpin democratic life” (Bouchard & Taylor, 2008, pp. 44-45).

Recently, the philosophy of state neutrality became a key point in the Quebec Charter of Values discussion.⁴ Though the Charter was ousted along with the Parti Québécois (the political party responsible for the introduction of the Charter), strong sentiments regarding the duty of the state surfaced. The Hon. Bernard Drainville, Minister responsible for Democratic Institutions and Active Citizenship, stated:

The state has no place interfering in the moral and religious beliefs of Québécois. The state must be neutral...We therefore propose to affirm in the Québec Charter of Human Rights and Freedoms the state’s independence from religions, to ensure there is no bias in favour of one confession or another. For this religious neutrality to take shape in public institutions, it must also show in the people who work for them. We therefore propose to establish a duty of religious neutrality and reserve among state personnel (as cited in Farrow, 2013, para. 3).

Many scholars, however, have problematized the application of neutrality. Douglas Farrow (2013), for example, suggested that while clear guidelines to moral religious accommodation would be helpful, the concept of a neutral state is “absurd” (para. 8) and that a state which suggests God does not exist in a secular sphere is not neutral; it is in fact agnostic or even atheist. This is corroborated by Moon (2012), who argued “the requirement of state neutrality to take no position on religious issues is actually indicative of a type of state agnosticism” (p. 568).

Neutrality in pedagogy

Neutrality in religious instruction has been a hotly debated issue. In the report conducted by Martínez-Torrón and Durham (2012) examining the implementation of religious education across the world, the authors found that a neutral, non-denominational type of religious education has “been gaining momentum in various countries” (p. 22). In examining the case in Canada, mandatory religious education courses are declared constitutional only so far as they meet certain specific requirements that guarantee their neutrality (Martínez-Torrón & Durham, 2012). However, the report also found that in their examination of the practical problems of the implementation of religious education, the

teaching of such a subject requires teachers that are highly qualified in teaching moral issues, and also that “neutrality is very difficult to achieve in this particularly sensitive area” (Martinez-Torrón & Durham, 2012, p. 23).

Many scholars have explored neutrality vis-à-vis education (Kelly, 1986; Morris, 2011; Warnock, 1975). One of the earliest references to neutrality and pedagogy is Warnock’s (1975) “The Neutral Teacher.” Warnock acknowledged the need for a neutral teacher as stemming from two grounds: fear of teachers indoctrinating students, and the promotion of independent student learning, which is seen to flourish in classes where teachers do not provide their opinion. In addressing these concerns, Warnock outlined her own arguments against neutrality. Firstly, a teacher is a role model and has the responsibility to guide students to understand how to weigh evidence and model to students how to arrive at a conclusion. Warnock (1975) stated, “the teacher must in teaching pupils to assess evidence fairly, give them actual examples of how the teacher does this himself or herself. The pupils may disagree with the teacher” (as cited in Warnock, 1988, p. 181). The openness for students to agree or disagree is a deliberate way to address the fear of indoctrination. The teacher may provide his or her opinion, but in such a way that it is still open to debate and discussion amongst students and thus not the sole governing viewpoint.

The second point Warnock (1975) raised in addressing the challenges of neutrality is the impact that a neutral posture has on teacher authenticity. Warnock argued that a neutral teacher is “play-acting” and that “play-acting is despicable... a person ought to have and express moral beliefs, and this entails that as a teacher one cannot remain neutral” (as cited in Warnock, 1988, p. 185). Warnock outlined the parameters of non-neutrality such as the teacher clearly stating, “that it is simply *his or her opinion*” [emphasis added] when sharing the teacher’s perspectives (Warnock, 1988, p. 184). Finally, Warnock (1988) began to acknowledge the nuances within neutrality, claiming, “uncommitted neutrality in the teacher, in so far as possible, is not desirable” (p. 182). Warnock’s points regarding neutrality help contextualize the early definitions of neutrality and also raise important concerns over the kind of neutrality outlined for ERC teachers. Issues of authenticity and teacher identity are the two overarching concerns Warnock highlighted in relation to adopting a stance of neutrality in the classroom.

Kelly (1986) further developed these nuances and variations of pedagogical neutrality. These include: exclusive neutrality (avoids anything controversial), exclusive impartiality (teaches one perspective as the truth), neutral impartiality (teacher remains viewpoint neutral; does not openly present his/her personal point of view) and committed impartiality (teacher’s views are clearly owned and not disguised). The guidelines for teacher conduct of ERC teachers follow the “neutral impartiality” (Morris, 2011) approach, which has proven to be challenging for the reasons Warnock highlighted. In the following sections,

I discuss the challenge of a neutral impartial approach in the ERC and the suggestion to move to a more balanced teacher posture of “committed impartiality” as highlighted by Kelly. This alternative form of neutrality may help to alleviate some of the concerns surrounding teacher identity and authenticity that Warnock raised.

PROBLEMATIZING THE APPROACH OF THE ERC: THE COMPLEXITIES AND CONTRADICTIONS OF TEACHER NEUTRALITY

The complexity of the ERC lies in a contradiction. While the ERC program espouses an overall goal of recognizing the other, ERC teachers have explicit instructions from the Ministry of Education (MELS) to maintain a stance of neutrality even as they foster the prescribed program competency of engaging students in dialogue. To specify, teachers are asked to bracket their own worldviews and perceptions upon entering the classroom while simultaneously asking students to share *their* perspectives and opinions. This professional stance, referred to as “neutral impartiality” (Kelly, 1986; Morris, 2011), means that in the interest of fairness to students, teachers do not openly express their personal preferences. To elaborate, MELS instructs ERC teachers not to “promote their own beliefs and points of view” and maintain a critical distance with “respect to their own convictions, values, and beliefs” while at the same time fostering values of “openness to diversity, respect for convictions, recognition of self” (Ministère de l'Éducation, du Loisir et du Sport, 2008, p. 12).

The contradiction in the approach of the ERC is described by Farrow (2009) in his examination of the ERC curricular aims. Farrow asked, “ERC claims to be neutral about religion, and to aim at presenting religions in a neutral, objective manner. Is the ERC curriculum actually neutral in its approach to religion?” (p. 9). In discussing the complexities of a program that is not epistemologically neutral, but requires a teacher to be neutral in their professional stance, Farrow highlighted the complexities of neutrality in practice. Farrow raised three points to counter the neutral approach of the ERC.

The first point addresses the philosophies and worldviews inherent in any pedagogy. Farrow (2009) questioned how pedagogies can be neutral as they are rooted in specific philosophies and worldviews. This idea that pedagogy is devoid of fundamental principles and values highlights the fundamental challenge of the ERC. The implications of the Quiet Revolution and the conception of the ERC to combat discrimination against new immigrants demonstrate, on the contrary, that the system of education has a very specific goal.

This brings up Farrow's (2009) second observation. The ERC promotes the dignity of others while at the same token asking teachers to compromise their own identity in the classroom. This is further complicated given that research has shown that teacher satisfaction is linked to feeling natural in the classroom (Schuck, Buchanan, Aubusson, & Russell, 2012). One of the major concerns

with teacher education today is the lack of inclusion of teacher voices in curriculum matters and educational decisions (Moore, 2007; Wilson & Delaney 2010). Asking teachers to leave their worldviews at the door, so to speak, only serves to further marginalize and “other” the teacher by removing them from the conversation (Said, 1979). This exclusion of teacher voice only heightens the marginalization teachers feel when decisions in the educational institutions of which they are a part fail to include their voices.

Farrow’s final point was that while the ERC program may require a level of passivity on the part of the educators, the state takes an active role in deciding how and what should be taught. To this end, Farrow (2009) observed, “by making ERC mandatory – universally mandatory – the State imposes its philosophy and its pedagogy on everyone” (p. 9). This point demonstrates the State’s agenda in supporting their value system through the ERC, while by the same token, asking teachers to be neutral in their approach. I would therefore argue that the “neutral impartiality” approach that the ERC imposes upon teachers is especially difficult given the very active role the State plays in the development of the curricular aims, values, and approaches of the ERC.

DISCUSSION AND RECOMMENDATIONS

Despite the complexities of applying the concept of neutrality in the classroom, some form of pedagogical neutrality has validity. Despite Warnock’s (1975) concerns over the impact of neutrality on a teacher’s sense of self, she raised the point that advocates of neutrality are most concerned with indoctrination and student agency in decision-making. Noddings (1993) explored the challenge of exploring religious thought and experience in school settings. Though Noddings was in agreement that “questions about the existence and nature of gods, about the meaning of life, and about the role of religion in societies... have been recognized as paramount... and, therefore, central to education” (p. xiii), she was clear about the approach teachers should take in the classroom. In addition to extensive preparation that equips teachers to explore existential and religious questions, teachers will succeed if they “are willing to engage in continuous inquiry, and... are committed to pedagogical neutrality” (Noddings, 1993, p. 139). Noddings outlined that pedagogical neutrality requires teachers to “present all significant sides of an issue in their full passion and best reasoning” but “avoid claiming any one perspective as true” (p. 122). Instead the role of the teacher is to “refer to beliefs clearly stated by others and let students weigh the evidence or decide to reject it” (Noddings, 1993, p. 134). This is an oppositional viewpoint to the one Warnock presented, in which teachers model how to weigh evidence by providing their own process of reaching a conclusion.

Therefore, given the debates surrounding the concept and application of neutrality, I would promote the fourth form of teacher posture that Kelly

(1986) spoke about when providing the variations of neutrality: committed impartiality. This approach is corroborated by Rymartz (2012), who suggested that complete neutrality, such as the one required of ERC teachers, is difficult to apply given that one's worldviews permeate into every aspect of one's life. Berger (2002) and Perry (1991) also argued that requiring adherents of faith to leave their beliefs behind when participating in public life is unreasonable, unrealistic, and results in annihilation of a central part of their self. Thus, committed impartiality allows the teacher to participate in classroom dialogue, with the understanding that their viewpoint is owned, presented as one of many perspectives, and that spaces for critical thought are encouraged. Kelly (1986) further asserted that as students mature in thinking and age, they may grow distrustful of the teacher who deliberately avoids providing their input.

In an empirical study conducted on new teachers' views on neutrality in the classroom, Kelly and Brandes (2001) found that their participants felt that total neutrality was unattainable given that "there are ways in which teachers make their opinions known through the language that they use, all sorts of adjectives that we slip in there to describe this politician or that leader" (p. 446). Additionally, one of the participants felt that disguising one's beliefs may convey apathy to students (p. 449). Morris (2011) suggested that committed impartiality may be a better fit for the ERC teacher professional posture provided that teachers follow advice like Kelly's and "praise reasoned oppositional viewpoints, push students' to critique teachers' points of view, publicly engage in self-critique, or critique students who merely parrot them" (Kelly, 1986, p. 132).

In revisiting the report conducted by Bouchard and Taylor (2008), the posture of "committed impartiality" posed by Kelly (1986), would be a good model in achieving the larger aims of pluralism and dialogue. For instance, it balances the negotiations around state neutrality in that teachers are required to own their opinions and clearly state their biases, but also allows for the kind of dialogue a pluralistic society demands. In understanding the integration and intercultural policies highlighted in the report, a "committed impartial" pedagogy would fulfill the premise that Québec society is "pluralistic and open to outside contributions, within the limitations imposed by respect for basic democratic values and the need for intercommunity exchange" (Bouchard & Taylor, 2008, p. 38). Furthermore, in defining interculturalism, Bouchard and Taylor offer a proposal with eleven aspects, one of which reads: "interculturalism strongly emphasizes interaction, in particular intercommunity action, with a view to overcoming stereotypes and defusing fear or rejection of the Other, taking advantage of the enrichment that stems from diversity" (p. 39). This part of the definition of interculturalism highlights a form of dialogue that rests upon sharing perspectives and seeing the potential in diversity. This conversation, governed by the parameters of committed impartiality that is highlighted above, has great potential in the ERC classroom.

CONCLUSION AND FUTURE DIRECTIONS

To conclude, it is important to highlight some of the limitations in the kind of neutral approach the ERC requires. For instance, in understanding the various definitions of neutrality, it is clear from the literature that teachers require key skills in order to navigate amongst this balance of neutrality and facilitation. Moore (2007) highlighted the skill of self-reflexivity vis-à-vis the teaching of religion: “educators should develop the tools of reflective practice that will enable them to interrogate their own assumptions about religion in order to minimize unconscious bias” (p. 92). In this regard, Harvard University’s program in Religion and Secondary Education (PRSE) can be used as an illustrative model. Harvard prepares its teacher candidates to engage their students in diversity among particular traditions without adopting a devotional standpoint. Further research needs to be done in order to explore this aspect further, as it is beyond the scope of this paper, which has examined the concept of neutrality from two perspectives: state and educational. In both instances, the application of neutrality has proven to be problematic given the various definitions attributed to the definition and understanding of neutrality.

I argue that while the ERC is an essential component of a student’s education, the difficulties in applying the kind of neutrality the Ministry of Education outlines hinder the teacher from fostering a space that is open to the kind of dialogue and openness the ERC curriculum aims to achieve. I suggest that another variation of neutrality, that of “committed impartiality,” as defined by Kelly (1986), may be the best pedagogical approach for ERC teachers. This posture allows teachers to contribute to classroom discussion and creates a space for dialogue to flourish while also alleviating fears of indoctrination through the “owning of ideas” and the presentation of multiple perspectives.

In understanding the validity and feasibility of committed impartiality, however, research around teacher experiences with current pedagogical practices in the ERC classroom will require the voices of the teachers. Often scholarly work excludes the voice of the stakeholders; however, these voices are essential in understanding the limitations of theoretical suggestions. There currently exists a gap in literature representing the voice of the ERC teachers, yet as a group, they are one of the most important stakeholders in actualizing its very important aims. The ERC can be successful in fostering values of religious literacy and religious sensitivity; however, the voice of the teacher must be included in assessing the successes and limitations of suggested pedagogical approaches in the classroom.

NOTES

1. For more on religious literacy, see Diane Moore's (2007) *Overcoming Religious Illiteracy: A Cultural Studies Approach to the Study of Religion in Secondary Education*.
2. Now called the Ministère de l'Éducation, de l'Enseignement supérieur et de la Recherche. This paper uses the former name (MELS) to reflect the author of the published the ERC program document.
3. For instance, Statistics Canada (2011) reports, "of the immigrants who came prior to 1971, 2.9% were affiliated with Muslim, Hindu, Sikh or Buddhist religions, whereas 33.0% of immigrants who came between 2001 and 2011 reported affiliation to one of these religions" ("Increased share of recent immigrants from Africa, Caribbean, Central and South America", para. 3).
4. This is shown in the title and terminology the Parti Québécois (PQ) used in the promotion of the Charter of Values. For example, the title was changed to the "charter affirming the values of state secularism and religious neutrality and of equality between women and men, and providing a framework for accommodation requests" and former PQ leader Pauline Marois claimed that the Charter enforced the equality of men and women and state neutrality as the "basic foundations of our society" ("Québec secular charter 'abolishes rights,'" 2013).

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ARZINA ZAVER is a PhD Candidate in the Faculty of Education at McGill University and an experienced educator. She has conducted an ethnographic study on the application of neutrality among Ethics and Religious Culture teachers. arzina.zaver@mail.mcgill.ca

ARZINA ZAVER est doctorante à la faculté des sciences de l'éducation de l'Université McGill et une enseignante d'expérience. Elle a piloté une étude ethnographique auprès des enseignants d'éthique et de culture religieuse sur la mise en pratique de la neutralité. arzina.zaver@mail.mcgill.ca