

Consultation Response Form

This is the response form for the consultation on the green paper, *Integrated Communities Strategy*. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (*).

Full details of the proposals being consulted on can be found at <https://www.gov.uk/government/consultations/integrated-communities-strategy-green-paper>.

The consultation will begin on Wednesday 14th March 2018 and will end on 5th June 2018. All responses should be received by no later than 23:45 on 5th June 2018.

To prevent losing your responses, you may wish to draft your response to the questions in a Microsoft Word document, before copying and pasting into the form.

Navigating the form

There are 14 questions in this form. You **do not** have to answer every question.

Submitting additional information

At the end of the form information is provided on how you can submit additional information or evidence to support your consultation response.

Thank you for taking the time to complete this form. Your responses will inform how we take the proposals forward.

Your details

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Are you happy for the Ministry of Housing, Communities and Local Government to contact you to discuss your response?

Yes

Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?*

Please select an item from the drop down menu:

Organisational response

Please provide the name of your organisation:

National Secular Society

If you are responding on behalf of an organisation, please select the option which best describes your organisation.*

Please select an item from the drop down menu

Other (please specify below)

If you selected 'Other', please state the type of organisation:

Not for profit

General Overview

The questions in this section relate to the Introduction – Building Integrated Communities.

Question 1

We define integrated communities as communities where people - whatever their background - live, work, learn and socialise together, based on shared rights, responsibilities and opportunities. Do you agree with our definition?

Please select an item from the drop down menu

Yes

Please enter any additional comments below:

As an organisation campaigning for freedom, fairness and equality for people of all religions and none, the National Secular Society fully supports the vision of Britain as a nation with fully integrated communities where people of all backgrounds live, work, learn and socialise together, based on shared rights, responsibilities and opportunities. We agree that there are a worrying number of communities divided along race, faith and socio-economic lines and we support action to improve integration. In 21st century Britain, we are now more religiously-diverse than ever before and increasingly irreligious. According to the most recent British Social Attitudes survey, over half of all people in Britain have no religion.

Our approach to integration should not only be about managing 'problems' but setting out a positive vision for what citizenship means in the context of modern Britain. Participation in an integrated society is not a duty to be imposed on people by the state (though it does involve duties). It is a right to be safeguarded by the state. Living together in an integrated society doesn't mean sharing all the same values or ways of life, but it does require a core of shared values.

In recent decades successive governments encouraged a multicultural approach to dealing with the changing demographics of society. This has tended to encourage diversity at the cost of undermining some common human rights and values. More recently, multiculturalism has evolved into 'multifaithism', with identity described around religion. This has resulted in an approach which emphasises communal or group rights, and treats minority religions as homogenous. Such an approach, like multiculturalism, gives unjustified power to group leaders, sometimes at the expense of individual human rights.

A focus on 'communal rights' under the multicultural framework has led to horrendous abuses, be it female genital mutilation (FGM) or forced marriage. People (particularly women) have been left isolated from mainstream society and trapped in cultural and religious blocs, within which group pressure and 'shame' culture denies them their legal rights.

Likewise, under the emerging 'multifaith' approach where minority groups are seen exclusively through the prism of religion, the rights of women and 'minorities within minorities' are abandoned and ignored and secular space has diminished. These groups include, for instance, gay Muslims, ex- Muslims and (though not a minority) women.

The state should treat all citizens equally as individuals rather than as members of communities that are only deemed to be accessible through invariably patriarchal and often unrepresentative community leaders.

While there are proposals in the Integrated Communities Strategy Green Paper that we fully support, there are others which have caused us significant concern. There are some proposals that, if implemented poorly, could result in greater social segregation by privileging the rights of certain groups over others. And there are other proposals that may result in the state encroaching too far into religious practices, undermining the principles of secular democracy.

We are also disappointed that the Paper fails to challenge one of the most significant factors driving segregation in our communities: state-funded faith schools. Rather than acknowledging that faith schools contribute to segregating families along religious lines through both indirect and direct discrimination, this proposal conversely praises faith schools for their academic performance and Ofsted results, while casting the majority of state schools without a religious character as under-achievers.

The Paper (published before the Government's response to the 'Schools that work for everyone' consultation) omits any mention of plans to expand faith school education and increase the number of school places allocated on the basis of faith. This is such a grave omission that it forces us to question the sincerity of proposals to improve integration in schools, particularly in light of the Department for Education's announcement that it will support and fund a new wave of fully religiously selective voluntary-aided schools, albeit it has decided to retain the 50% admissions cap for faith-based free schools.

Please refer to our following responses for more detail on our analysis of the Paper.

The National Secular Society would be happy to assist in advising decision-makers on the impact proposed integration strategies will have on the relationships between people of different religions and beliefs. We encourage you to contact us should you wish to discuss further.

Question 2

We believe that the varied nature and scale of integration challenges means that tailored local plans and interventions are needed to tackle the issues specific to particular places. Do you agree?

Please select an item from the drop down menu

Not sure / don't know

Please enter any additional comments below:

We agree that integration challenges are not uniform throughout the country and that in some cases it is appropriate to tailor local plans and interventions to tackle the issues specific to particular areas.

However, we caution against policies that may result in vastly different provisions in public services in order to meet specific demands of select communities. Please see our response to Question 4 regarding the issue of certain councils supplying unstunned meat for school meals in response to demands from Muslim 'faith leaders', while other councils refuse to supply unstunned meat on animal welfare grounds. Such divisions caused by an over-willingness to accommodate religious demands are a barrier to integration.

Question 3

Do you have any examples of successful approaches to encourage integration that you wish to highlight, particularly approaches which have been subject to evaluation?

Please select an item from the drop down menu

Yes

Please enter any additional comments below:

The two-thirds of schools in the UK that have no religious character are doing excellent work in creating environments where pupils from all backgrounds can study together, and so contribute greatly towards genuine integration.

We are therefore disappointed that the tone of the Green Paper is undermining this excellent work. P.26 of the Green Paper praises faith schools, saying that they “are more likely to be good or outstanding, compared to non-faith schools” and “achieve better results at Key Stages 2 and 4 than non-faith schools”. It also states, “Many faith schools have a diverse intake of pupils from a wide range of ethnic and socio-economic backgrounds.”

But this section fails to mention that non-faith schools are achieving far more in promoting integration than faith schools. Non-faith schools do not promote any specific religious or non-religious worldview, meaning they are welcoming environments for pupils of all faiths or none. They also do not engage in any form of discrimination against pupils or teachers on the basis of faith. In contrast, faith schools promote a single worldview from their own faith perspective, meaning pupils from families who do not share the faith are alienated. Many faith schools also actively discriminate against pupils whose parents do not share the school’s faith, in addition to teachers and prospective teachers who do not share the faith.

Schools without a religious character are not only succeeding in promoting better integration between families of different religions and beliefs. They are also succeeding at reducing ethnic and socio-economic segregation. In 2017, Challenge, SchoolDash and the iCoCo Foundation reported in [Understanding school segregation in England](#) that schools of no faith are less ethnically segregated than faith schools. And according to research by the [Fair Admissions Campaign](#), comprehensive secondary schools with no religious character admit 11% more pupils eligible for free school meals than live in their local areas. Comprehensive Church of England secondaries admit 10% fewer; Roman Catholic secondaries 24% fewer; Jewish secondaries 61% fewer; and Muslim secondaries 25% fewer.

That faith schools admit fewer children from poorer families is why at first glance it appears that faith schools achieve better results at KS2 and KS4. [Research](#) published in 2016 by the Education Policy Institute found that after adjusting for "disadvantage, prior attainment and ethnicity," pupils in primary schools with a faith ethos "seem to do little or no better than in non-faith schools". Pupils in secondary schools with a faith ethos record only "small average gains" over non-faith schools or "just one-seventh of a grade higher" in GCSE results. The Education Policy Institute study concluded that such minute gains came with a risk "of increased social segregation". It also noted that "the average faith school admits fewer pupils from poor backgrounds than the average non-faith school".

Chapter 1: Strengthening Leadership

The questions in this section relate to Chapter 1: Strengthening Leadership.

Question 4

The Green Paper proposes that we need to build the capacity of our leaders to promote and achieve integration outcomes. Do you agree?

Please select an item from the drop down menu

Not sure / don't know

Please enter any additional comments below:

We agree with some aspects of this proposal, but we have some reservations.

We welcome the proposal to make sure that voices from women and minority groups are heard. We would like to add that it is also extremely important that the “minorities within minorities”, such as LGBT people from a faith background, have genuine opportunities to make their voices heard.

Allowing people from all backgrounds to participate and rise to leadership in society requires a bottom up approach. Rather than leadership being the preserve of specific groups or community roles, we would like to see every young person given (through citizenship education and schemes such as the National Citizenship Service that bring people from different backgrounds together) the skills and experience to make their voice heard.

It is positive that the Paper acknowledges that “changemakers” are not always those in positions of authority. However, we still have concerns that the proposal to “build the capacity of our leaders” may result in too much emphasis being placed on ‘faith leaders’ as the representative of particular communities. We agree with Dame Louise Casey that too many leaders in faith institutions and in communities have allowed diversity and difference to become separatism and segregation that has divided communities.

It is vital to acknowledge that ‘faith leaders’ do not represent the views of all members of the faith group they lead, and indeed sometimes their interests may be opposed to the interest of others in the community.

For this reason, we recommend increasing opportunities for ordinary people in particular groups to express their own views, rather than being spoken for, and placing less emphasis on ‘faith leaders’.

Providing support to faith communities needs to be done with great caution. To the extent that religion is often a factor in creating division, more religion may be a backwards step. If faith institutions are not properly checked, this could mean strengthening radical groups which are the most likely to hold anti-integration and intolerant views. Also, it must be noted that although some religious communities work well in interfaith contexts, some religious doctrines can be hostile to all other religions and beliefs.

We also have concerns regarding the implementation of the public sector equality duty (PSED). While we absolutely agree that public authorities have a duty to eliminate discrimination, advance equality of opportunity and foster good relations between people with different characteristics, we are disappointed that in practice there are too many exemptions from the Equality Act to allow public authorities to carry out this duty effectively. State-funded faith schools are permitted to discriminate against people on the grounds of faith in their admissions and employment policies, and to teach aspects of their faith that run contrary to the Equality Act – for example, teaching that same-sex relationships are immoral, as revealed in our [report on Relationships & Sex Education at faith schools](#).

Additionally, we are worried that PSED may be implemented in a way that results in religious groups having their demands prioritised over the non-religious. For example, despite the majority of Muslims accepting stunned halal meat slaughtered in-line with animal welfare laws, we are aware of at least six councils in England that supply unstunned halal meat in schools in response to the demands of a minority of Muslim ‘faith leaders’. Bradford Council even produced an 87-page ‘halal manual’, developed in consultation with Muslim ‘faith leaders’. While councils that form policies based on the demands of religious groups may believe that they are acting within PSED, the reality is that such policies can undermine the needs and views of those who do not share the same beliefs. Due to the suffering it causes to animals, [77% of the British public want to see non-stun slaughter banned](#). It is therefore not in the interest of the majority of the British public for councils to be supplying unstunned halal in school meals. There are far more councils that refuse to supply unstunned halal meat, with many citing animal welfare concerns.

While we support public authority efforts to promote integration, this will not be achieved by giving ‘special treatment’ to religious groups and allowing them exemptions from laws that govern everyone else; this is in fact the very opposite of an integrated community.

Chapter 2: Supporting New Migrants and Resident Communities

The questions in this section relate to Chapter 2: Supporting New Migrants and Resident Communities.

Question 5

The Green Paper proposes measures to support recent migrants so that they have the information they need to integrate into society and understand British values and their rights and responsibilities. Do you agree with this approach?

Please select an item from the drop down menu

Yes

Please enter any additional comments below:

Education is vital in assisting migrants to integrate. All schools should be equally welcoming to migrants from all cultures and faith backgrounds, including those of no faith. We also support initiatives to tackle hate crime, and to promote high-quality citizenship education which promotes an understanding of human rights.

Question 6

The Controlling Migration Fund was constructed to deal with the short-term migration pressures and associated costs that local authorities can encounter. Do you think it adequately achieves this objective?

Please select an item from the drop down menu

Not sure / don't know

Please enter any additional comments below:

While the CMF may tackle some short-term migration pressures, more needs to be done, particularly in the field of education, to deal with the deeper problems of integration.

Chapter 3: Education and Young People

The questions in this section relate to Chapter 3: Education and Young People.

Question 7

The Green Paper proposes measures to ensure that all children and young people are prepared for life in modern Britain and have the opportunity for meaningful social mixing with those from different backgrounds. Do you agree with this approach?

Please select an item from the drop down menu

No

Please enter any additional comments below:

Although there are some proposals in Chapter 3: Education and Young People that we support, we must strongly warn against other policies that will increase segregation. We must also express our dissatisfaction with the Paper's failure to address clear and present barriers to integration within education caused by the provision of state-funded faith schools.

We have outlined our positions on particular aspects of Chapter 3 below.

Faith schools as a barrier to integration

We are dismayed that the Paper, while acknowledging the existence of schools segregated on ethnic and socio-economic lines, does not tackle one of the principle underlying causes: the existence of state-funded faith schools. Instead, the Paper praises faith schools while portraying the two-thirds of British schools without a religious character as lower-achieving. P.26 of the Paper says that faith schools "are more likely to be good or outstanding, compared to non-faith schools" and "achieve better results at Key Stages 2 and 4 than non-faith schools". It also states, "Many faith schools have a diverse intake of pupils from a wide range of ethnic and socio-economic backgrounds."

But this section fails to mention that non-faith schools are achieving far more in promoting integration than faith schools. Most non-faith schools do not promote any specific religious or non-religious worldview, meaning that they are welcoming environments for pupils of all faiths or none. They also do not engage in any form of discrimination against pupils or teachers on the basis of faith.

Schools without a religious character are not only succeeding in promoting better integration between families of different religions and beliefs. They are also succeeding at reducing ethnic and socio-economic segregation. In 2017, Challenge, SchoolDash and the iCoCo Foundation reported in [Understanding school segregation in England](#) that schools of no faith are less ethnically segregated than faith schools. And according to research by the [Fair Admissions Campaign](#), comprehensive secondary schools with no religious character admit 11% more pupils eligible for free school meals than live in their local areas. Comprehensive Church of England secondaries admit 10% fewer; Roman Catholic secondaries 24% fewer; Jewish secondaries 61% fewer; and Muslim secondaries 25% fewer.

Faith schools' admittance of fewer children from poorer families explains why, at first glance, they appear to achieve marginally better results at KS2 and KS4. [Research](#) published in 2016 by the Education Policy Institute found that after adjusting for "disadvantage, prior attainment and ethnicity," pupils in primary schools with a faith ethos "seem to do little or no better than in non-faith schools". Pupils in secondary schools with a faith ethos record only "small average gains" over non-faith schools or "just one-seventh of a grade higher" in GCSE results. The Education Policy Institute study concluded that such minute gains came with a risk "of increased social segregation". It also noted that "the average faith school admits fewer pupils from poor backgrounds than the average non-faith school".

We also concerned that Ofsted is awarding 'good' or 'outstanding' ratings to some faith schools while missing key issues in them. We have found a number of examples of 'good' and 'outstanding' faith schools where policies indicate that pupils are taught that sex outside of marriage, contraceptives and same-sex relationships are morally wrong. Ofsted should penalise schools which fail to provide impartial education on healthy relationships and uphold their duties under the Equality Act.

Instead of promoting schools of no particular religious character that are genuinely inclusive of pupils from all backgrounds, the Paper instead makes reference to school linking programmes. We question why the government has spent £500,000 on school linking programmes to encourage pupils from different faith backgrounds to interact when non-faith schools achieve this on a daily basis with no additional public money required. As the 2017 [Understanding school segregation in England](#) report by Challenge, SchoolDash and the iCoCo Foundation has found, proposals to increase contact between pupils in different schools are "not a substitute for the day to day mixing of children at school".

A case study on p.29 praises the Quwwat-ul-Islam Muslim school for its ties to a Catholic school. This is not enough in itself. The school appears academically sound and says it "celebrates diversity" and "welcomes applications from children of all faiths and backgrounds". However, all the pupils appear to be from Muslim backgrounds, and all the girls wear hijab as their uniform. Although many women choose to wear it, the hijab is a symbol of restriction for many women and seems inappropriate attire in the context of encouraging integration within British values.

One girl at the school is praised on the school website for her memorisation of a large part of the Quran. This form of extreme rote learning of religious texts seems injudicious in a British state-funded educational setting. Can there really be room in such a school for non-Muslim girls?

In its case study on Dixons Mixed Multi-Academy Trust on p.29, the Paper states: "Whilst none of the their Academies holds a specific faith designation, they are all owned equally by children of all faiths and none, and are designed to meet the needs of students from all backgrounds." This model, in which pupils from families of all faiths and none have a genuinely equal stake in the school community, is how our state education system should be – not divided into schools representing different faith communities.

Discrimination in School Admissions

The Paper says "we expect all state-funded schools to be inclusive and welcoming of pupils of different backgrounds". We are disappointed that the Government has no intention of enforcing that or making it a reality.

Whilst we welcome the announcement that the government will retain the 50% faith cap on admissions to new faith-based free schools, plans to actively support the creation of more voluntary-aided schools are a regressive step and a back-door attempt to appease religious lobby groups by expanding faith school education and increasing the number of school places allocated on the basis of faith.

Department for Education guidance on school standards in relation to fundamental British values says it is "unacceptable" for schools to "promote discrimination against people or groups on the basis of their belief, opinion or background". How then, at the same time, can the Government enable and encourage schools to do just that with regard to their admissions arrangements?

If the government is serious about promoting integration, fundamental values and social cohesion, it cannot afford its current equivocal approach.

Equality Law exemptions which allow faith schools to discriminate against pupils and staff on the basis of religion is completely contrary to the notion of "integrated communities". If the Government is sincere in its aim to improve integration, a basic starting point is to ensure no state-funded school can discriminate against people on the basis of religion. Faith schools should follow exactly the same rules as those without a religious character: they should not be able to prioritise any child or staff member on the basis of religion.

Ultimately, the Government should seek to move towards a non-discriminatory, fully inclusive and secular education system.

Home education

We welcome the proposals to revise guidance on home education that will clarify local authorities' existing powers to take action where home educating parents

are not fulfilling their duties to provide their child with suitable full time education. We believe no children should be “invisible” to local authorities because they have never been registered at a school, or have been withdrawn from school and “disappeared” from records. It is vital that all children can be safeguarded against abuse or neglect.

Independent schools

We [strongly support](#) the proposal to review whether the regulatory regime for independent schools that fail to meet required standards should be strengthened. We would like to highlight the issue that there have been independent schools teaching ideas that contradict fundamental British values and the Equality Act.

Universities

We welcome initiatives that ensure lawful free speech can thrive in universities and ensure universities take into account their legal obligations under the equality law. We note that the [report](#) by the Joint Committee on Human Rights (JCHR) on freedom of speech at universities found that critics of religion are among those whose free speech is most likely to be restricted at universities.

School ethos, curriculum and fundamental British values

We strongly support the promotion of ‘fundamental British values’ in schools. We endorse the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs and welcome the fact that this duty on schools provides a mechanism for us to challenge practices including gender discrimination, the promotion of bigotry and hatred against different groups and the doctrinaire teaching of regressive social attitudes.

We also agree with the Paper’s statement that “Pupils have the right to manifest a religion or belief, but not necessarily at all times, in all places or in a particular manner”. We welcome its statement that the government expects “school leaders to consider carefully reasonable requests to accommodate religious or other beliefs but to weigh this against the objectives of creating a unified school ethos or for the safety of pupils”.

The Green Paper states that in formulating their policies, schools need to ensure they act within their duties under equalities and human rights law. This is correct, but equality law exceptions that undermine human rights law must be repealed. These include the exceptions that allow schools to discriminate on grounds of religion or belief and impose acts of worship on pupils. Where religious education is provided, schools should be obliged to provide a broad, balanced and objective curriculum.

Unregistered schools

We strongly support the government’s provision of additional resources to Ofsted to inspect suspected illegal schools, and plans to publish guidance on how the government, Ofsted and local authorities can collaborate to help ensure children

attending unregistered independent schools are safe and receiving a suitable education. We believe unregistered full-time schools must be closed down; no child should attend a school that is unregistered and out of reach of inspectors and local authorities.

Question 8

The Green Paper sets out proposals to support parents with their choice of out-of-school education settings. Do you agree with this approach?

Please select an item from the drop down menu

Yes

Please enter any additional comments below:

Out-of-school educational settings, including religious supplementary schools, are a poorly regulated area and there is [clear evidence](#) of need for a new system of registration, regulation and inspection to ensure that children in such settings are safeguarded.

We fully supported previous proposals to develop such a system and fear a process of voluntary self-regulation will be inadequate to properly safeguard children.

We note with concern that many of the responses opposing proposals for greater regulation of out-of-school settings were from faith groups stating concerns “around the effect that the proposed regulation would have on out-of-school settings being able to exercise religious and other freedoms”. Because these proposals resulted specifically from concerns that “children attending them may be more vulnerable to the risk of extremism and exposure to other forms of harmful practices”, it is worrying that such a large proportion of those opposed represent faith groups.

Children and young people have a fundamental right to be protected from harm. Article 4 of the Convention on the Rights of the Child (Protection of rights) places a duty on governments to take all available measures to make sure children’s rights are respected, protected and fulfilled. By pandering to religious lobbying we fear the Government will leave children in out-of-school settings without sufficient protection.

We welcome the proposal to work with local authorities to provide more guidance for parents to support them in making an informed choice when considering out-of-school education settings, and the steps they can take where they might have concerns.

Chapter 4: Boosting English Language

The questions in this section relate to Chapter 4: Boosting English Language.

Question 9

(a)

The Green Paper proposes a number of measures to improve the offer for people to learn English. Do you agree with this approach?

Please select an item from the drop down menu

Yes

Please enter any additional comments below:

We agree that learning English is vital to integration and we support the Government's proposals in this area. We would like the Government to note that many children raised in isolated religious communities, often attending independent schools, unregistered schools or not attending a school at all, are not taught any English. This can have potentially life-threatening consequences; in 2016, a group of children from the Charedi Jewish community attending an unregistered school nearly drowned on an outing to the Kent coast because their lack of English skills meant they were unable to read warning signs.

(b)

Do you have any other suggestions on how we can improve the offer for people to learn English?

Please select an item from the drop down menu

Yes

Please enter any additional comments below:

No child born in the UK should grow up unable to speak English. All independent schools and home educators should be required to ensure they are teaching their child sufficient English to prepare them for life in the UK.

Chapter 5: Places and Community

The questions in this section relate to Chapter 5: Places and Community.

Question 10

The Green Paper proposes measures to ensure that people, particularly those living in residentially segregated communities, have opportunities to come together with people from different backgrounds and play a part in civic life. Do you agree with this approach?

Please select an item from the drop down menu

Yes

Please enter any additional comments below:

We agree that shared spaces and shared activities can help social integration and bring communities together by creating a sense of place and fostering local residents' pride.

We would emphasise that, from an integration perspective, community initiatives where people come together over shared interests and local issues are preferable to those based around religious identities.

On p.43 the Paper notes that Pakistani, Bangladeshi and other Muslim communities are the least mixed. The Government may wish to consider the extent to which the Islamic doctrine known as al-Wala' wa'l-Bara', meaning (very roughly) loyalty and enmity, creates obstacles to integration. It provides that Muslims should remain loyal exclusively to Muslims and must distance themselves from all other religions and actively hate their followers, as is much emphasised by Salafists, including UK and foreign-based preachers.

It teaches that Muslims should stick together and have nothing or as little as nothing to do with non-Muslims (sometimes referred to by the derogatory term 'kuffar'). Muslims should never associate with non-Muslims, take them as friends, visit their homes, dress like them, congratulate them on their birthdays, weddings, at Christmas – and much more. If taught in mosques, Muslim schools, madrassas and other out-of-school educational settings this could clearly have a negative impact on integration and social cohesion.

We are disappointed that in this Chapter, residential segregation has been cited as “a key factor driving segregation in schools” but the issue of faith schools

fuelling segregation has been ignored. Please see our responses to *Chapter 3: Education and Young People* for our full view regarding faith schools. It must be acknowledged that state schools are themselves public spaces and community hubs; they should therefore all be genuinely welcoming of people of all faiths and none, and neither directly nor indirectly discriminate against them on the basis of religion.

Additionally, we are concerned that some councils have been making planning decisions that fuel division and mistrust between people of different religions and beliefs. Please see our response to Question 4 for details on how some councils have supplied unstunned meat to schools, elevating the demands of a religious minority over the wider public interest and animal welfare concerns.

We would also like to highlight that occasionally religion finds its way into public spaces and activities that should be inclusive to all. One example is the Remembrance Day service at the Cenotaph. Although the Cenotaph itself was designed to be secular, and so inclusive for people of all faiths and none, the service itself has a distinctive Christian character and features hymns, prayers and a procession led by a bishop. Other examples include council-run crematoria with fixed religious symbols present, and public services such as libraries being run by churches who use this as an opportunity to evangelise and proselytise.

We do not object to public services being contracted to providers with a religious ethos – but only if the quality of service is high and there are safeguards in place to ensure the service provided is entirely secular, non-discriminatory and with no suggestion of a particular religion being promoted.

Chapter 6: Increasing Economic Opportunity

The questions in this section relate to Chapter 6: Increasing Economic Opportunity.

Question 11

The Green Paper proposes measures to provide tailored support to people, especially those who may not currently be active in the labour market, to build their confidence and skills to take up employment. Do you agree with this approach?

Please select an item from the drop down menu

Yes

Please enter any additional comments below:

We support the government's initiative to increase economic opportunities for all people from all backgrounds.
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Chapter 7: Rights and Freedoms

The questions in this section relate to Chapter 7: Rights and Freedoms.

Question 12

The Green Paper proposes measures to encourage integration and resist divisive views or actions. Do you agree with this approach?

Please select an item from the drop down menu

Not sure / don't know

Please enter any additional comments below:

While there are some proposals in this Chapter that we support, there are others that cause us concern.

Protecting rights and freedoms

The Green Paper states protections in the UK to allow people to practise their faith or belief are some of the strongest in the world.

We believe integration and social cohesion will be best served by the state defending the absolute freedom of religious and other belief, whilst at the same time being clear that the right to manifest religious belief is only assured insofar as it does not impinge on the rights and freedoms of others.

In seeking to maximise religious freedom, the state must not turn a blind eye to the violation of others' rights and freedoms when done in the name of religion. Therefore, when a religious accommodation would impede the rights of others, undermine legitimate public policy efforts or create an excessive financial burden, the state has every right to restrict religious manifestations.

We welcome the statement (on p.60): "it is important to recognise that the freedom to practise religion needs to be balanced against the rights and freedoms of others".

The Paper adds that "striking the right balance can be challenging, especially as social norms change". The Government must be prepared to strike this balance.

Although the Paper states "the government's respect for faith communities will not prevent us vigorously promoting rights to equal treatment", we see little evidence of this. For example, publicly-funded schools run by religious groups are permitted to discriminate on grounds of religion in admissions and employment practices. Genital cutting of boys is defended with no regard for the rights of the child. Grooming gangs in several cities have been allowed to continue, often out of fear on the part of the police, social workers or councils that they may be

deemed racist or 'Islamophobic' if they acted against them. More broadly, the notion of respect often leads to a refusal to tolerate criticism of religions.

We are alarmed that p.57 states "The law allows people to eat Halal and Kosher meat, with strict rules in place that give the maximum possible protection to animals subject to religious slaughter" as an example of protecting rights and freedoms. Not only does this statement ignore and undermine legitimate animal welfare concerns that the public hold about religious slaughter, but it is also misleading.

Far from animals being given "the maximum possible protection", kosher and halal slaughterhouses are given exemptions from animal welfare laws which mean that they do not have to stun the animals before slaughter, leading to unnecessary suffering. It is clear that the majority of Muslims in the UK accept pre-stunning prior to slaughter; over 80% of all animals slaughtered for halal diets in the UK in 2012 were prestunned. Some halal suppliers, such as Najma, consider stunned meat to be more in-line with Islamic values than unstunned meat because it causes less suffering.

The Farm Animal Welfare Council, the EU's Scientific Panel on Animal Health and Welfare, Federation of Veterinarians of Europe, RSPCA, Compassion in World Farming, the British Veterinary Association all agree that animals should be stunned before slaughter. Many other liberal democracies - Denmark, Estonia, Finland, Iceland, Latvia, Liechtenstein, Lithuania, New Zealand, Norway, Sweden and Switzerland - have banned non-stun slaughter.

[77% of the British public want to see non-stun slaughter banned](#), in line with the rules that apply to all other forms of animal slaughter. In addition to animal welfare concerns, some people have religious or philosophical objections to eating religiously-slaughtered meat; for example, many Sikhs consider halal and kosher meat to be prohibited to them. Yet non-stunned meat is increasingly present in food that is not intended specifically for Muslims and Jews, and it is frequently not labelled as such. As yet, it is still not a legal requirement for unstunned meat to be labelled as such. The fact that it is increasingly difficult for consumers who wish to avoid eating unstunned meat to do so due to lack of labelling laws impedes rights and freedoms, rather than restricting them.

That such a divisive issue as religiously slaughtered meat, which is responsible for fostering bitterness and mistrust between communities, has been cited as an example of "protecting rights and freedoms" shows a serious lack of judgement.

Taking action on hate crime

We welcome government initiatives to tackle hate crime and its causes.

We particularly welcome the fact that religious hate crime data held by the police based on the motivation of the attacker (where this is known) will be available to reveal the true scale and nature of the problem. This is something we have been calling for for many years.

Hate on the internet

While we agree with challenging hateful speech, discrimination and sectarian bigotry, we also believe that a society with robust freedom of expression is best placed to do this. We are concerned that in some cases, criticism and satire of religion on the internet is being wrongly censored as 'hate speech'. It is crucial that any policies to tackle hate on the internet do not restrict the freedom to criticise or mock religion, and so bring back *de facto* 'blasphemy laws'.

The Government and others must recognise that not all criticism of Islam (or religious traditions and practices in general) is due to bigotry.

Tackling extremism

We welcome the new Commission for Countering Extremism and look forward to working with it to support its goals.

Understanding influences from overseas

We support proposals to improve understanding of the ways in which overseas influences can undermine attitudes to rights and freedoms in the UK. We believe that emphasis on the idea of 'one law for all', in that all people from all communities in the UK are subject to the same democratic laws, can help in reducing overseas influences that undermine our rights and freedoms. We support Citizenship education that promotes this idea and other British values, and strongly oppose attempts by religious communities to undermine British law with parallel 'legal systems' based on religious doctrine.

Supporting faith communities

We are concerned that this section of the Paper is too focused on faith institutions, which may lead to the treatment of 'faith communities' as homogenised blocks, a blurring of the separation of church and state and the exclusion of the non-religious.

Although we acknowledge that inter faith activities can help to facilitate dialogue between people of different faiths, some inter faith initiatives and activities can be exclusionary and inward-looking. Inter Faith Network for the UK, one of the organisations that the government funds, will only allow faith groups, inter faith groups, and educational or academic bodies with a focus on inter faith issues to join them. Non-faith groups such as humanists, atheists and human rights groups without a particular faith ethos cannot join, even if they demonstrably share IFN's goals of promoting inter faith understanding and cooperation. Inter faith initiatives that do not include the non-religious merely serve to create a division between the non-religious and the religious.

Strengthening Faith Institutions Programme

Caution is needed here. Some faith institutions, boards of trustees, and minority school boards may simply be learning good PR tactics, having realised that some

of their earlier behaviour gave rise to bad publicity. Strengthening them as faith bodies may not help improve this. Clerical elites may learn governance techniques and become more slick, yet maintain highly orthodox attitudes that are harmful to integration.

The proposals also mention supporting Charity Commission registration. We are concerned that this may lead to more religious organisations that do not provide a genuine public benefit becoming charities, and being entitled to tax exemptions not afforded to non-religious organisations.

Regarding proposals to redefine conditions of the visa system for religious workers, we welcome any initiative that brings the visa system for religious workers in line with those for any other workers in fields with comparable skillsets.

Dar ul Uloom qualifications

We are concerned that the Government will convene a working group to identify barriers to Dar ul Uloom schools to achieve higher education accreditation from UK universities.

Dar ul Ulooms are a 19th-century style of religious academy. The many Dar ul Uloom academies in the UK are direct imports from Pakistan and north India. We understand that they are of Deobandi orientation, meaning that they are likely to adhere to fundamentalist theology, notably in their attitudes to non-Muslims and life in non-Muslim societies. This [short example](#) from a South African Dar ul Uloom argues that Muslims should not shake the hands of non-Muslims.

One Ofsted report on a Birmingham Dar ul Uloom stated: “A large number of copies of a leaflet containing highly concerning and extremist views, such as ‘Music, dancing and singing are acts of devil and prohibited’, were discovered during the inspection.” The school responded by calling the inspection “racist”.

It should also be noted that all Dar ul Ulooms registered in England appear to be single-sex (male), meaning that women are currently unable to access this form of education.

We therefore question the wisdom of linking Dar ul Ulooms with our higher education system and advise extreme caution.

Question 13

The Green Paper proposes measures to address practices which can impact on the rights of women. Do you agree with this approach?

Please select an item from the drop down menu

No

Please enter any additional comments below:

We support reform on the law on marriage to improve equality, fairness, clarity and transparency. However, we are very concerned that the government's proposals in this area will not be conducive to these aims.

The Paper proposes requiring that civil marriages are conducted before or at the same time as religious ceremonies, in response to the issue that women in sharia 'marriages' are being treated unfairly.

We are concerned that if it became a legal requirement for anyone conducting a religious or otherwise ceremonial ritual resembling marriage to ensure the couple were civilly married, this would impinge upon religious and personal freedom. Couples may wish to choose to have a ceremony to commemorate their relationship or satisfy spiritual needs without entering into a legally-binding institution. Pagans and Humanists are two of the groups aside from Muslims that could see their freedoms reduced by a law requiring civil marriage to be held before or at the same time as their ceremonies. We are also concerned that requiring civil marriage to take place before or at the same time as a religious 'marriage' would be a step towards legitimising religious codes, imbuing them with legal significance that they currently lack.

Rather than attempting to 'protect' women by putting restrictions on religious 'marriages', we would like to see women from all communities being genuinely empowered by a program of education to ensure they are aware of their rights and choices in the area of marriage. No woman should ever be in the position where she does not know what constitutes a legal marriage and the difference in the rights and protections involved in a civil marriage and a religious marriage. The government must make every effort to reach women in isolated communities to inform them of the laws of the land.

Religious institutions should be strongly encouraged to take responsibility in ensuring the rights of those entering a ceremonial partnership with another person are being protected and know what the laws of the land are. They should also carefully consider the ethics and safeguarding aspects of who they bind in a religious ceremony if it involves vulnerable people.

If there is evidence that an individual has been misled into thinking an unrecognised religious 'marriage' confers similar rights and protections as a civil marriage, this should be treated as fraud. Additionally, anyone who performs or facilitates a religious ceremony that contributes to a process of grooming underage or vulnerable people unable to consent should be punished under the Sexual Offences Act.

Rather than the state encroaching on religion through imposing new laws on religious ceremonies, we would strongly recommend a complete separation of

religion and state in the institution of marriage. We would like to see marriage reformed completely as a civil institution, with no 'religious' marriage having any legal bearing without a separate civil marriage also taking place. We believe that reforming the current system to secularise the civil act of marriage would result in far less confusion over the status of religious 'marriages' and also make the system fairer for both the religious and non-religious.

One way to achieve this would be to abolish the necessity for legally-binding marriages to be held in a registered building (either religious or civil). Instead, the legal status of the marriage should be determined by the registrar and the registration process. This is in line with arrangements for Jewish and Quaker marriages, as well as the law in Scotland which operates with some success. It would mean that couples would have far greater freedom to marry where they wished; a civil marriage could still take place in a place of worship as part of a religious ceremony.

If the Government is to address practices which can impact on the rights of women it must recognise the ways in which the entrenchment of sharia councils and parallel legal systems within minority communities creates a space for the perpetuation of patriarchal control and harm to women.

It must also recognise the need to challenge 'modesty culture'. One specific arena to do so would be in schools, where education policy should empower girls and help them to make their own decisions once they are ready to do so. For example, girls from Muslim backgrounds could be supported to have free choices, rather than having so called 'modesty' codes imposed on them. NSS research has revealed a number of schools where the hijab is imposed via school uniform policy. No child should be obliged to wear the hijab, or any other article of religious clothing, whilst at school.

Meanwhile, a growing number of schools are making accommodations to allow young girls to wear the hijab – sometimes under pressure from religious communities. The Government should robustly support schools which decide not to incorporate the hijab when they make the decision in the best interests of children. We see no good reason why accommodations to allow the wearing of the hijab should be made by primary schools.

Chapter 8: Measuring Success

The questions in this section relate to Chapter 8: Measuring Success

Question 14

The Green Paper proposes core integration measures for national and local government to focus on. Do you agree these are the right measures?

Please select an item from the drop down menu

Yes

Please enter any additional comments below:

We generally agree with these methods. However, we would like to reiterate our dismay that the segregation inherent to faith schools, and the exemptions from the Equality Act that enable them to self-segregate even further, have not been addressed in these indicators. Although “type and contexts of social mixing among pupils in segregated schools” and “better promotion of integration in schools” have both been listed as indicators, it is hugely regrettable that the Green Paper has not been used as an opportunity to confront the very clear challenge faith schools pose to genuine integration.

The National Secular Society would be very happy to be contacted for further information or advice on methods for improving integration between communities of all faiths and none.

Submitting additional information

You can submit your additional information to the following email address:

IntegrationStrategy@communities.gsi.gov.uk.

You may wish to compress your document into a zip file before sending, or consider using a file transfer link if it is a large document.

If you send your additional information via email, please make sure the subject says "Consultation response: additional information from [insert your name/organisation]".

Personal data

The data protection legislation is changing and a new Data Protection Act will come into force in May 2018. It will give you greater powers to protect your own privacy, and place greater responsibility on those processing your data for any purpose. The following is to explain your rights and give you the information you will be entitled to under the new Act.

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer

The Ministry of Housing, Communities and Local Government (MHCLG) is the data controller. The Data Protection Officer can be contacted at dataprotection@communities.gsi.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

Part 2 of the draft Data Protection Bill (subject to change before it becomes an Act) states that, as a government department, MHCLG may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Responses submitted using this template will be stored securely on the Ministry of Housing, Communities and Local Government's secure IT system.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Please refer to the records retention policy on our website.

<https://www.gov.uk/government/publications/departmental-records-retention-and-disposals-policy>

6. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a. to see what data we have about you
- b. to ask us to stop using your data, but keep it on record
- c. to have all or some of your data deleted or corrected
- d. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be used for any automated decision making.