

Comparing European Policies on Religious Diversity, Inclusion, and Bullying in Schools: A Multi-Dimensional Framework Approach

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Abstract

Importance

Although European education systems increasingly promote diversity and inclusion, little is known about how policies explicitly address religious-based bullying, diversity and inclusion across national contexts. Religious-based bullying is a distinct form of identity-based bullying targeting individuals because of their religious beliefs, practices, or visible religious identity.

Objective

This study examines how policies used by educational systems address religious diversity, inclusion and bullying, to what degree religious-based bullying is recognised as a distinct phenomenon or whether it is embedded within broader equality and diversity frameworks.

Method

A comparative document analysis was conducted of 63 policy documents from nine European countries (Cyprus, Czechia, England, Ireland, Latvia, Malta, Norway, Portugal and Switzerland). Documents included legislation, policy frameworks, curricula, action plans, guidelines and regulations relevant to education. Data were extracted using a standardised qualitative tool and analysed through a hybrid thematic approach combining Clarke and Braun's (2017) six-stage thematic analysis framework with Bråten's (2015) *Three Dimensions and Four Levels Framework* as a deductive analytical lens.

Results

Across all countries, policies reflected strong supranational influences, particularly human rights, equality and inclusion principles. Religion was commonly linked to respect for diversity and social cohesion. Explicit recognition of religious-based bullying was rare. Most countries addressed religion within broader equality, diversity and inclusion or anti-bullying frameworks rather than a distinct policy concern. Cyprus was an exception, explicitly identifying religious-based bullying. While national policies showed substantial alignment in values and objectives, implementation varied considerably at the subnational level due to differences in guidance, resources, accountability mechanisms and teacher training.

Conclusion

European policies related to education broadly promote inclusion and respect for religious diversity, but explicit attention to religious-based bullying remains limited. Policy approaches tend to frame religion within wider equality and diversity agendas, potentially hiding the specific dynamics and experiences associated with religious-based bullying.

Implications for practice

Schools and policymakers should strengthen the visibility of religious-based bullying within anti-bullying policies, provide targeted professional development in religious literacy and diversity, and establish stronger implementation and evaluation mechanisms. Greater engagement with teachers, pupils and communities is needed to ensure that policy commitments translate into inclusive school environments for all learners.

Introduction

Religious diversity has increased significantly across European societies. However, studies examining religious-based bullying, diversity and inclusion are limited (Chan & Stapleton, 2021; Moulin, 2026), despite a growing body of research on bias-based bullying more generally (Sapouna et al., 2026). Religious-based bullying is a specific form of identity-based bullying targeting individuals or groups based on their religious beliefs or practices (Cucoş et al., 2023). Within the school environment, this compromises the fundamental values of inclusion, mutual respect, and social cohesion that should in

schools (Council of Europe, 2015). Moulin (2026) argues that, while religious-based bias may intersect with other forms of prejudice, including ethnic and cultural bias, it has distinctive dimensions, including belief, practice, visibility and history, that shape how bullying is experienced, justified and interpreted. He observes that religious minorities and visibly religious pupils are particularly vulnerable to religious-based bullying, with potential consequences including poorer mental health, school avoidance, and longer-term social and economic disadvantage (Moulin, 2026).

Against this backdrop, our study sought to examine the extent to which European policies address and respond to issues of religious diversity, inclusion and bullying in schools. Particularly whether they recognise the distinctive dynamics of religious-based bullying, or whether religion is subsumed within broader identity categories, such as ethnicity and culture. This understanding would inform the development of a subsequent study exploring educators' and pupils' experiences of policies and practices for identifying, addressing, and responding to religious-based bullying, diversity and inclusion in schools.

Definitions of 'policy' in the literature are ambiguous, nebulous, and therefore difficult to define, reflecting the diverse meanings attributed to policy by different actors and contexts (Mulpeter et al., 2024; Skerritt et al., 2023). Policy has been broadly conceptualised as a process of negotiation and contestation among stakeholders (Ozga, 1999), as a stance adopted by governments or other influential agencies (Considine, 2005), and as a mechanism for addressing identified problems and achieving desired goals (Harman, 1984). For the purposes of our paper, policy is understood as the interrelated body of legislation, circulars, frameworks, guidelines, and procedures through which educational systems articulate expectations, promote values and objectives, and shape professional practice. Consistent with policy enactment perspectives, these policy instruments are viewed not merely as formal texts but as resources that are interpreted, translated, and enacted by educational actors within specific social, cultural, and institutional contexts (Ball et al., 2011).

We draw on data extracted from policy documents across nine European diverse contexts - Cyprus, Czechia, England, Ireland, Latvia, Malta, Norway, Portugal, and Switzerland - to answer our research question "How do policies linked to schooling in different European countries address religious-based bullying, diversity and inclusion?". Given the diversity across the countries, including differences in population demographics, national contexts, religious traditions, educational principles, and schooling systems, a single theoretical framework was insufficient to address our aims. We therefore adopted Bråten's (2015) *Three Dimensions and Four Levels Framework (Multi-Dimensional Framework)* as a comparative analytical lens. This enabled us to examine policies across diverse contexts and contribute to a deeper understanding of the complex social, cultural, and political factors shaping inclusion in a multicultural Europe (Välimäki et al., 2024).

This paper is based upon work from [removed for Blind review].

Literature Review

European education policies are embedded within a human rights framework emphasising intercultural dialogue, social cohesion, and anti-discrimination (Eurydice, 2023). A notable trend is the shift from tolerance to active engagement with diversity, often described as a "pluralistic turn," which promotes participatory and relational pedagogies in schools (Eurydice, 2019). Schools are encouraged to foster dialogue, community involvement, and pupil voices, moving beyond mere tolerance toward genuine understanding and respect (Zilliacus et al., 2017).

Despite shared commitments to anti-discrimination, European countries diverge significantly in policy orientation and implementation. Examples are noted in France's secularist paradigm emphasising civic education and neutrality, often at the expense of religious expression (Franken, 2016). This approach tends to overlook the cultural and religious needs of minorities, potentially fostering exclusion and marginalisation (Jackson & Everington, 2016). In contrast, Germany, Spain, and the Netherlands promote intercultural and interfaith dialogue, religious literacy, and inclusive curricula, which are generally associated with positive pupil outcomes but require substantial resources and teacher competence (Gearon, 2017; Jackson & Everington, 2016). The Netherlands and Belgium exemplify pillarized systems where faith-based schools receive public funding, which can reinforce social segregation if not carefully managed (Franken, 2016). These paradigms demonstrate that

policy success, often associated with learner outcomes, implementation integrity and/or effectiveness, depends less on the chosen model and more on implementation fidelity, teacher training, and school culture (Gearon, 2017).

Macro-Level Factors Shaping Policies

Empirical research indicates that effectiveness of policies addressing diversity depends on contextual factors including resource availability, societal attitudes, and local governance. Contexts where diversity is widely accepted tend to be associated with stronger cultures of inclusion and lower levels of bullying (Välimäki et al., 2024). Resource-rich environments with proactive leadership and well-trained teachers are better positioned to implement comprehensive anti-bullying strategies, including those targeting religious harassment (Meehan & Borg Axisa, 2022).

Political ideologies also shape policy orientations. Firstly, progressive systems generally prioritise human rights, secularism, and intercultural dialogue, fostering inclusive policies. Conversely, nationalist and conservative governments may emphasise religious preservation and restrict diversity initiatives (Stevens, 2023). International norms, including EU directives and UN treaties, provide normative guidance but are often mediated by domestic political will and societal attitudes, which ultimately determine policy implementation and success (Jackson & Everington, 2016).

Second, school leadership and pedagogical practices are critical mediators of effective bullying prevention and in promoting social cohesion. Schools fostering an inclusive ethos, characterised by respect, participation, and recognition, are more effective at reducing bullying and promoting social cohesion (Purdy, 2021). Teacher training in intercultural and religious literacy enhances teachers' capacity to respond to diversity and conflict, fostering respectful classroom environments (Schihalejev et al., 2020).

Finally, curricula emphasising multicultural education and dialogue serve as powerful tools for prejudice reduction and empathy building. Integrating diverse religious and cultural perspectives affirms pupils' identities and promotes mutual understanding, thereby decreasing identity-based bullying (Florian & Spratt, 2013).

Despite extensive scholarship on religious education, intercultural education, and bullying prevention (e.g., Fandrem & Skeie, 2024), few comparative studies have systematically analysed how national policies simultaneously address religious-based bullying, diversity and inclusion across multiple European countries. Existing research typically examines these issues separately or focuses on individual national contexts. Our study addresses this gap by providing a cross-national comparative analysis of policies across nine European countries using Bråten's (2015) *Multi-Dimensional Framework* as a comparative analytical lens.

The Three Dimensions and Four Levels Framework

The countries in our study exhibit diverse arrangements governing the relationship between religion, state, and schooling. Understanding how their education policies address religious-based bullying, diversity and inclusion necessitates a robust analytical lens. Bråten's (2015) *Multi-Dimensional Framework* for comparative religious education offers two sets of analytical comparative dimensions: 1) the interplay of supranational, national, and subnational influences (*Three Dimensions*), and 2) hierarchical curriculum levels - societal, institutional, instructional, and experiential (*Four Levels*). This framework facilitates systematic cross-national comparisons and highlights how macro-level norms translate into micro-level classroom practices (Bråten, 2015).

In the first dimension, comparative educational research focuses on supranational, national and subnational processes rather than treating the nation state as the only meaningful unit of analysis. The supranational dimension encompasses the normative work of bodies including the United Nations, the Council of Europe and the European Union, whose conventions, directives and monitoring instruments circulate expectations about non-discrimination, human rights and social cohesion that member states are expected to absorb (Dale, 2006). For instance, the UN's Convention on the Rights of the Child (UNCRC, 1989) promotes the right to non-discrimination based on religion, thereby influencing national legislation and school policies (UNESCO, 2017). Similarly, EU directives emphasise intercultural dialogue and anti-discrimination measures,

fostering shared commitments across member states (Eurydice, 2016). The European Commission against Racism and Intolerance (ECRI) issued policy recommendations underscoring schools' central role in combating racism and religious intolerance (ECRI, 2006, 2021a, 2021b). These supranational norms serve as normative backbones, shaping national policies that often embed principles of respect, equality, and non-discrimination into school curricula and ethos (Jackson & Everington, 2016).

At the national level, countries translate these supranational norms into context-specific policies, and the political and professional debate, reflecting their historical, cultural, and political landscapes as outlined above. The recognition of religious minorities and their rights vary considerably, shaping curriculum content, teacher training, and school ethos.

Subnational governance further localises policies, adapting national frameworks to community needs and cultural contexts. Norway and Spain exemplify decentralised systems where regional authorities tailor curricula and inclusion strategies, emphasising local identities and languages (Bråten, 2015). Such localisation enhances relevance and effectiveness of national policies but also introduces variability in policy implementation and outcomes.

The second dimension of the framework emphasises the hierarchical curriculum level and involves societal narratives, institutional laws, instructional practices, and pupil experiences (Bråten, 2015). It addresses various socio-political processes shaped by politicians and interest groups that determine which subjects and topics belong in school and which materials are legitimate, how curriculum is formalised in laws, policy and curricula, and how teachers and students enact it in their own classrooms (Bråten, 2015).

Societal narratives, such as Norway's framing of Christianity as cultural heritage, shape societal attitudes towards religious education (Bråten, 2013). Institutional policies formalise principles of inclusion and anti-discrimination; for example, the UK's Equality Act (2010) explicitly recognises religion as a protected characteristic (Stevens, 2023). Instructionally, teachers operationalise these principles through classroom practices, intercultural dialogue, and religious literacy initiatives (Lucas et al., 2008). At the experiential level, pupil perceptions and peer relations mediate policy impacts; positive climates characterised by respect and participation are linked with reduced bullying (Cucoş et al., 2023).

However, influence and hierarchical curriculum do not move neatly between levels. Societal and instructional levels may interact more strongly than institutional and instructional ones, allowing policy ideas to reach classrooms through public debate while bypassing formal institutions (Bråten, 2015). Relations between levels are therefore reciprocal and non-linear (Bråten, 2015). This perspective enables our study to trace where supranational commitments are incorporated into national instruments of the analysed countries, where they are weakened, and where classroom practices around religious-based bullying, diversity and inclusion draw on resources not anticipated by the policy record.

Methodology

As part of the [project details removed for blind review], this study was undertaken by [project details removed for blind review]. One task was to: *Examine policies and practices for schools to deal with diversity and integration, with a particular focus on religion and religious ethos*. Our nine countries, Cyprus, Czechia, England, Ireland, Latvia, Malta, Norway, Portugal, and Switzerland, offer a diverse cross-section of European regions, characterised by substantial variation in economic contexts, population sizes, cultural environments, and educational systems. Population figures differ markedly, ranging from approximately 0.5 million in Malta to around 57 million in England, alongside considerable linguistic diversity across, and sometimes within, the countries. Document analysis enabled us to examine policy content across time and contexts and understand how ideas and information are formally presented (Dalglish et al., 2021).

Eligibility criteria

Documents were included if intended for secondary education settings attended by pupils aged 11 years and above (O'Brien et al., 2025). Eligible materials were publicly accessible and produced by Government, national, regional, or local authorities

with responsibility for secondary education. There were no restrictions on the number of policies reviewed per country and all were sourced from the respective authorities' websites.

A range of document types were considered, in line with our understanding of "policy" (Table 1). Table 2 shows the types and number of documents collected from each country. Excluded documents were those specifically intended for primary schools, vocational education, colleges, or universities.

Table 1
Documents Retrieved

Document type	Description
Government/Ministerial Policy Document	Official policy issued by a ministry, example: frameworks, White Papers, or concept documents.
Strategic Framework/Action plan	Multi-year strategic documents outlining priorities and actions.
Law/Act	National/Regional education law with legal force, passed by parliament/government.
Guidelines/Manuals /Recommendations	Non-binding documents providing recommendations/best practices to schools, teachers, or local authorities.
Curriculum/Educational Programme Document	Official curriculum/syllabus/educational guidelines that integrate religious diversity, inclusion, or anti-bullying principles.
Regulation/Rule/Decree	Specific implementation rule/decreed issued by the ministry/government defining procedures/standards.

Table 2
Number of Documents per Country

	Country								
	Cyprus	Czechia	England	Ireland	Latvia	Malta	Norway	Portugal	Switzerland
Government/Ministerial Policy Document	5		2	1		5		3	1
Strategic Framework/Action plan	1	12			1				
Law/Act		2	2	2	3	3	1	4	3
Guidelines/Manuals /Recommendations			2	1	1				1
Curriculum/Educational Programme Document				1	1		3		
Regulation/Rule/Decree									1
Total	6	14	6	5	6	8	4	7	7

A total of 63 documents were analysed to identify how they address religious-based diversity, inclusion and bullying across nine countries.

To ensure consistency in data extraction, a predefined qualitative Excel data extraction tool was developed through numerous iterations (Ndungo et al., 2025). All team members acted as reviewers conducting in-depth desk-based research by accessing relevant official websites and databases relevant to their respective countries. Reviewers accessed the appropriate documents and copied and pasted the relevant content into the tool. Where necessary, the information was translated into English. The tool consisted of 22 columns; ten related to demographic details, including document type, geographic location, document website, and other relevant details. The subsequent 12 columns focused on specific aspects of the document including macro influences, links to religious/cultural diversity, references to religious-based bullying, and other topics.

Data analysis

We adopted a hybrid approach to data analysis, combining Clarke and Braun's (2017) six-stage thematic analysis framework with Bråten's (2015) *Multi-Dimensional Framework* as a deductive analytical lens.

Bråten's (2015) framework offers multiple entry points for comparative research, including the formulation of research questions (Bråten, 2015). Consequently, it was selected because it supports the systematic comparison of educational approaches to religious diversity across different contexts, while also allowing for consideration of context-specific factors that shape policy and practice.

First, we systematically examined the demographic data (first ten columns) to determine the types of documents included and to identify any missing information. The remaining 12 columns were then categorised into 5 overarching themes (Table 3 in 'Findings') and subsequently analysed to identify points of convergence and divergence across the documents. This process led to a reduction of the dataset, from 12 to 11 columns for thematic coding. The column 'Any emerging trends that might be evident' did not yield useful data for this exercise.

The coding process was initially inductive, involving repeated readings of the data within each column to identify recurring patterns that were refined and organised into broader themes. Bråten's (2015) framework was then applied deductively to structure and interpret the themes across the *Multi-Dimensional Framework*. The analysis was therefore neither purely inductive nor deductive but integrated data-driven theme development with theory-informed interpretation of the data (Fereday & Muir-Cochrane, 2006).

By combining a cross-national comparative design with a theoretically informed analytical framework, this methodology facilitates a layered examination of both the formal structure of policies and their intended educational implications. It also allows for the identification of gaps between policy commitments and the extent to which these are translated into practice at school level.

Findings

Bråten (2015) argues that valid international comparisons must account for the interplay between three overlapping dimensions of influence: Supranational, National and Subnational. To understand how these dimensions translate into practice, Bråten considers four operational levels: Societal, Institutional, Instructional, and Experiential. Table 3 shows how our data were categorised into 5 overarching themes and our deductive analysis in accordance with Bråten's (2015) *framework*.

Table 3
Dimensions and Levels in our Dataset

1	Overarching Themes	11 columns	Data applicable to the three Dimensions	Data applicable to the four Levels
	Context and Purpose	Main purpose of the document	✓	✓
		International - macro influences	✓	✓
2	Values, Principles and Ethos	Stated Values – Principles of the document	✓	
		Reference to religion/religious ethos	✓	✓
		Links to religious/cultural diversity, minorities and inclusion		✓
		Reference to bullying based on religion		✓
3	Governance, Participation and Collaboration	Stakeholder involvement/inter-agency collaboration		✓
4	Implementation and Operationalisation	Implementation mechanisms		✓
		Monitoring and accountability-implementation level	✓	✓
5	Evaluation	Main strengths of the document	✓	✓
		Weaknesses	✓	✓
Note. Cells with ✓ indicate categories applicable to the Multi-Dimensional Framework.				

Supranational

At the supranational dimension, concerns with human rights, child welfare, equality, safeguarding, pluralism, democratic participation and inclusive education are largely reflected in the reviewed documents. These documents are supported by global trends, European policy, human rights conventions and secularisation. They include the United Nations Convention on the Rights of the Child (1989), the European Convention on Human Rights (1953), the Sustainable Development Goals (2016), European Union law and guidelines and policies from the Council of Europe and UNESCO. These influences are evident in the stated purposes of several national documents. For example, Ireland's Education Training Board (ETBI) document: *Patrons' Framework on Ethos (2022)*, drawing on children's rights, equality and inclusion principles, seeks to create school communities characterised by respect, participation and belonging for all learners. Similarly, Norway's *Core Curriculum (2017)*, informed by human rights, democracy and sustainable development, positions education as fostering human dignity, inclusion and active citizenship. Cyprus' *The Integration of Pupils with Migrant Background to the Cyprus Educational System (2016)*, reflects wider European integration and inclusion agendas and promotes social cohesion and intercultural understanding among pupils from diverse religious and cultural backgrounds. Likewise, Portugal's *National Plan to Combat Racism and Discrimination 2021–2025*, shaped by European equality and anti-discrimination priorities, aims to ensure equal participation and protection for marginalised groups. Together, these examples demonstrate how supranational commitments to common values and certain international and EU-wide policies are translated into national policy objectives concerned with equality, participation, inclusion and respect for diversity. These common commitments are evident in the values and principles articulated in all examined documents. Collectively, they employ a rights-based discourse situating religious diversity within a broader supranational commitment to equality, diversity and inclusion.

With reference to religion and belief specifically, the documents reflect broader global human-rights norms. Religion is commonly connected to freedom of conscience (Portugal), non-discrimination (Latvia), equality (England, Switzerland),

protection from hate (Malta), children's rights (Ireland), intercultural education (Norway) and respect for diversity (Cyprus, Czechia). Accordingly, religion is seldom treated as exclusively a private concern and is often framed within broader democratic and rights-based commitments.

National

At the national dimension, international influences are translated through diverse national contexts. For example, through legislation, England (*The Education Act, 2011*) and Ireland (*The Education Act, 1998*) connect equality to school ethos, safeguarding and protected characteristics, while recognising the equal status of religious-based and non-religious schools. The English document *Keeping Children Safe in Education (2025)* directly links with the curriculum by connecting rights frameworks to equality law, safeguarding and school duties. In Ireland, *The Patrons' Framework on Ethos (2022)* draws on children's rights, equality and inclusion. The Norwegian curriculum adapts human-rights and pluralism discourses within a curriculum shaped by Christian-humanist heritage and democratic citizenship (*Curriculum in Christianity, Religion, Beliefs and Ethics (KRLE) (RLE01-03), 2019*). Portugal and Switzerland emphasise secular rights, freedom of conscience and state neutrality. Malta through its' *Constitution (1964)*, foregrounds freedom of worship, and protection from hate and an emphasis on mutual respect, while Czechia (*Anti-Discrimination Act (198/2009)*), Cyprus (*Policy Paper on the Integration of Pupils with Migrant Background to the Cyprus Education System, 2016*), Switzerland (*Federal Constitution of the Swiss Confederation, 1999*) and Latvia (*Education Law, 1999*) emphasise dignity, safety and prevention of discriminatory behaviour. It is important to note that across our countries similar principles were expressed in multiple documents per country.

Where the documents refer to religion or religious ethos, the national dimension is especially diverse because countries translate this through their own legal, historical and educational traditions. England combines faith-school provision, Religious Education (RE) and collective worship with equality and safeguarding duties. Portugal emphasises secularism, non-confessional public education and freedom of conscience. Ireland's *Education Act (1998)* recognises various types of schooling and gives equal status to denominational and multi-denominational approaches to education. Norway links religion and worldviews to Christian-humanist heritage, pluralism and human rights. Malta, Cyprus, Latvia, Czechia and Switzerland similarly combine constitutional rights, curriculum provisions and anti-discrimination principles in nationally specific ways.

Subnational

The subnational dimension refers to the regional, local, and school-level variations in policy and practice within a country. Across the reviewed document this is diverse and relies on implementation locally. In practice, this translates into curriculum content, safeguarding practices, anti-bullying procedures, and developing inclusive school cultures. The realisation of national values is therefore shaped by local capacity, school ethos, teacher confidence, and accountability arrangements. Consequently, distinguishing between national and subnational implementation processes is not always straightforward. Policies established at the national dimension have significant implications for governance and practice at the subnational dimension, while feedback and adaptations emerging from local implementation can influence national policy development.

Consequently, a supranational or national value like "equality" may be interpreted and experienced differently across schools. A similar pattern is evident for religious equality. The same national reference to religion or belief may be enacted and experienced differently depending on factors including ethos, leadership, community composition, available resources, and levels of professional confidence.

At the level of monitoring mechanisms, our documents show that monitoring mechanisms largely happen at the subnational dimension through local monitoring and evaluation. Experiences and perspectives of those involved in implementation are occasionally incorporated. For example, Ireland's *Patrons' Framework on Ethos Guidance (2022)* includes a feedback mechanism to inform policy support needs, while the Church of England's *Flourishing for All (2024, amended 2025)* was developed through stakeholder consultation and implemented nationally. Findings from these processes inform discussions

at the national dimension and may lead to revisions within formal institutional frameworks at both national and subnational dimensions.

Limitations are evident across the documents at the subnational dimension, showing challenges in translating policies, laws and guidelines formulated at the national dimension into effective implementation at the subnational dimension. These gaps suggest that translating broad policy objectives into effective practice within the specific contexts of schools and colleges remains challenging in meeting pupils' needs. Examples of this across the documents can be seen where the national dimension is too complex, broad and ambitious (example; England, Ireland, Portugal) or documents lack specific guidance and a matrix of success (example; Ireland, Portugal). These limitations lead to uneven implementation because of the lack of guidelines and insufficient specialised training (example; Ireland, Latvia, Cyprus) at the subnational dimension. Other limitations are identified where the documents are non-statutory (example; England) or are supported with outdated legal frameworks (example; England).

Four Levels

Societal

At the societal level, the documents demonstrate a strong degree of convergence in the values and objectives associated with religion and belief in education. For example, Ireland's *Patrons' Framework on Ethos (2022)* presents religion and belief as part of creating inclusive, participative school communities characterised by respect, belonging and democratic engagement. Similarly, Norway's *Core Curriculum (2017)*, positions religion and worldviews within broader aims of human dignity, democratic citizenship and social participation.

Consequently, religion and belief are positioned within wider public concerns about participation, belonging and social cohesion rather than being treated solely as a private matter. Religion is in fact presented as a part of wider questions about pluralism, secularism, heritage, identity, migration, social cohesion and democratic life.

A common pattern across the documents (for example, *Compendium of Cultural Policies & Trends Cyprus 2.5.2 (2019)* and *Curriculum in Christianity, Religion, Beliefs and Ethics (KRLE) (RLE01-03) 2019 (Norway)*) is that religion or belief is recognised as relevant to public education. The broader curriculum therefore incorporates critical thinking, identity formation and intercultural competence in all countries. By emphasising diversity as a resource, the reviewed documents aim to develop a school ethos rooted in respect, tolerance, and social cohesion, which extends beyond the classroom into broader society. A notable difference in the documents, is whether religion is framed as a protected freedom (for example, England), a cultural inheritance (for example, Norway), a protected aspect of identity within a multi-denominational ethos (for example, Ireland), or part of a broader diversity and inclusion agenda (for example, Switzerland).

In countries including England, Norway, Malta and Latvia, RE must reflect the Christian tradition and other major religions to promote tolerance. *The Core Curriculum (2017)* in Norway establishes diversity and inclusion as foundational principles across the education system. These concepts are deeply integrated into the school's mission to foster human dignity and democratic participation. In Switzerland, Ireland, and Malta critical engagement with identity, media, and culture is encouraged, promoting a learning environment that respects individual differences in culture, religion, and personal needs. Conversely, Portugal adopts a secular educational model where religion is treated as one aspect of social and cultural diversity rather than as a foundation for school ethos or educational provision.

Within our analysis we understood the societal level to also reflect academic debates and public discourse. This level is noted in some documents where reference to community partnership, faith groups and cultural organisations are encouraged to enhance the RE curriculum. For example, in Cyprus, the policy paper *The Integration of Pupils with Migrant Background to the Cyprus Educational System (2016)* promotes interfaith dialogue through structured conversations and initiatives designed to foster mutual understanding, respect and tolerance among pupils from different religious and belief backgrounds, thereby interrupting stereotypes, prejudice and social division.

Overall, the reviewed documents define an inclusive learning environment as one where diversity is viewed as a resource rather than a challenge. These links are fundamental to creating a democratic, inclusive, and multicultural educational environment that values diversity and promotes social harmony, preparing pupils for active participation in a diverse society.

Institutional

At the institutional level, the reviewed documents set out the purposes of guidance, curricula, strategies and anti-bullying measures that are translated into expectations for schools, whether framed through rights and compliance, curriculum, ethos, or safety and prevention. Accordingly, across the documents reviewed from the nine counties, inclusion is not considered optional or as a peripheral concern but is firmly embedded within national educational visions and underpinning legal frameworks. This is evidenced through the formal recognition of religion and belief as protected categories within legislative and policy structures. For instance, in England 'religion or belief' is one of the nine protected characteristics under *The Equality Act (2010)*, alongside others including race and sexual orientation. This thereby positions religious inclusion within a broader rights-based equality framework. A comparable approach is evident in Ireland, where the *Equal Status Act (2000)* similarly identifies religion as protected, ensuring equitable access to education. Cyprus also operates a rights-based approach reinforced by Article 20 of the Constitution (*Compendium of Cultural Policies & Trends, 2019*), which guarantees all children and young people the right to access education regardless of their religion, nationality, or language. By recognising the need to promote belonging and inclusion in society, various frameworks and guidelines acknowledge the existence of systemic inequality and legal frameworks are created to challenge it.

The reviewed documents note that pupils from minority faiths or cultural backgrounds may face additional intersectional vulnerabilities based on their ethnicity, gender, disability, and socio-economic status and call for proactive strategies to protect and include them. For instance, in Ireland, *The Equal Status Act (2000)* provides protection for Traveller groups; in Czechia integration of Roma/Cizinci populations are encouraged through the *Strategy for Prevention of Risky Behavior 2024–2028* and numerous Norwegian documents have protections for Indigenous Sami People who have a right to education based on their own values, languages, and culture. In Portugal, the Principle of Intersectionality is fundamental to *The National Plan to Combat Racism and Discrimination 2021–2025*. It recognises that discrimination does not occur in isolation and that combating it must consider the multiple identities of individuals.

The reviewed documents demonstrate a multifaceted approach to embedding respect for religious and cultural diversity across equality frameworks, curriculum content, and institutional ethos. For instance, *The Schools Act (561/2004)* in Czechia and *The Disability Discrimination Act, (2002)* in Switzerland, highlight the inclusion of pupils with special educational needs and disabilities. These measures underscore a commitment to ensuring equitable participation across diverse learner profiles, implicitly recognising that vulnerability may arise through the interaction of multiple forms of disadvantage.

References to religious-based bullying are largely implicit within national policy documents, typically addressed under broader equality and anti-discrimination legislation rather than through direct or explicit mention. Most countries (England, Ireland, Norway, Portugal, Malta) frame religious bullying within broader commitments to dignity, equality, and respect without references to 'religious-based bullying'. In Portugal, *The National Plan to Combat Racism and Discrimination 2021–2025* does not explicitly reference "bullying" based on religion, but it tackles the causes of bullying on religious grounds and aims to prevent it in the education system. In Ireland, "*Bí Cineálta: Procedures to Prevent and Address Bullying Behaviour for Primary and Post-Primary Schools*", (2024) identifies pupils who practice or display a religious faith as more at risk of experiencing bullying behaviour.

Cyprus represents a notable exception: the document *A guide to education in Cyprus (2025)* explicitly identifies and addresses religious-based bullying as a distinct form of harassment. This explicit recognition contrasts with the more generalised approaches observed elsewhere.

Across many jurisdictions, anti-bullying policies are robust and comprehensive, covering bullying related to protected characteristics, including religion. However, an important observation is that, aside from the Cypriot context, no national-level

documents explicitly identify religious-based bullying as a separate policy concern. Instead, such behaviours are typically subsumed under broader anti-bullying frameworks or addressed through school-level guidelines. In Latvia, under the *Guidelines for reducing bullying in primary and secondary schools (2023)*, protection from violence and humiliation and ensuring positive wellbeing and safe environments for pupils is provided, and although religious-based bullying is not referred to explicitly it is covered under “bullying”. In Malta, *The Education Act (Cap. 327 of the Laws of Malta 1988)* offers protection against hate or violence due to religious beliefs as well as protection against forced religious instruction with no explicit mention of religious-based bullying.

Instructional

At the Instructional level, policies demonstrate how religion is addressed in schools through the provision of religious, ethical or worldviews education, collective worship, intercultural dialogue, school ethos and anti-bullying policies. England, Ireland, Norway, Switzerland, Cyprus and Malta provide clear links between religion or worldviews and educational practice. Inclusion, respect and belonging require school leaders and teachers to create environments where pupils can express religious or non-religious identities safely. However, many documents still offer limited guidance on how teachers should address religion-based conflict, stereotyping or bullying in everyday classroom interactions.

Given that the Instructional level is associated with how teachers interpret, plan, and deliver the subject in classrooms, monitoring and accountability are usually measured at this level. Teachers and school leaders are expected to deliver an inclusive curriculum promoting respect, recognition for religious and cultural differences, bullying prevention and competent responses to safeguarding concerns. However, guidance, resources and professional learning vary across countries. For example, the Maltese document *Managing Behaviour in Schools (2015)*, lacks a process for monitoring and accountability. This document is important for developing and responding to the diverse needs of pupils with social, emotional, and behavioural difficulties requiring highly skilled and empathetic expertise. Without implementation measures, it is likely that this specialism is not in place and consequently drains already limited resources. In contrast the *Prevention of Risky Behaviour (2024)* strategy document in Czechia, was developed to support crisis intervention in schools. Mobile crisis intervention teams are responsible for implementation, suggesting resources are in place to deliver the strategy thus removing pressure from schools.

A lack of specialist teacher training is identified in some documents, impacting how teachers and school leaders can implement policies and guidelines in the classroom. An example is noted in Latvia. Although it has a strong legal foundation prohibiting discrimination on multiple grounds, including religion, *The Education Law (1999)* does not provide specific procedural guidelines for schools to prevent or address incidents of religious and cultural difference, including bullying. Consequently, teacher training in this space is lacking.

Within the teaching of the curriculum, documents often require schools to recognise and accommodate all faiths through actions such as involving local religious representatives (Ireland), providing culturally responsive resources and facilitating prayer (Cyprus) and recognising religious holidays (Portugal).

Experiential

The Experiential level is concerned with how pupils actively engage with and experience the curriculum. Consequently, because the reviewed documents outline the principles underpinning engagement rather than pupil experiences, direct evidence of this is limited. The intended learner experience is for schools to be safe, inclusive and respectful for all pupils. Few policies show how these values are monitored or evaluated, although there are directions and suggestions about seeking stakeholder views. This can be seen in *A guide to education in Cyprus (2025)* which stresses the importance of engaging pupils and their families in the educational process to ensure their needs and perspectives are considered.

International commitments describe the rights pupils should enjoy, but they provide limited evidence of whether pupils experience those rights as safety, belonging, recognition and protection from bullying.

Monitoring and accountability are implemented through a range of mechanisms, including external review processes in some countries (example; England, Czechia) and internal or cross-institutional review systems in others (example; Portugal, Ireland, Norway, Czechia, Switzerland), occasionally supported by data-driven monitoring tools (example; Latvia, Czechia). While some documents outline comprehensive evaluation frameworks, including multi-layered assessment structures (example; Cyprus, Norway), others provide less detailed guidance (example; Malta). In certain cases, reporting processes incorporate public disclosure measures to enhance transparency, with findings often feeding into national monitoring and data systems (example; Ireland, Latvia). These arrangements help to connect national policy objectives with implementation at the institutional level.

In some countries, monitoring and evaluation processes extend beyond institutional actors to include pupils and parents, thereby incorporating the perspectives and lived experiences of those directly affected by policy implementation. This participatory approach acknowledges the experiential dimension of educational policy and provides insights into how policies are understood and experienced in practice.

Discussion

This study examined how European policies address and respond to issues of religious-based bullying, diversity and inclusion in schools through the lens of Bråten's (2015) *Multi-Dimensional Framework*. Across the supranational, national, and subnational dimensions, a common commitment to inclusion, respect, and diversity is noted. However, a prominent tension is evident between the promotion of religious diversity and the explicit recognition of religious-based bullying. Consequently, this impacts how bullying and exclusion of this nature are addressed and responded to at the school and classroom level.

Religious-Based Bullying as a broader EDI Concern

At the supranational level, international organisations have established comprehensive normative frameworks that significantly influence national policies and educational practices regarding religious education, diversity, and school bullying but how these are enacted nationally and locally is country and context specific. Our overall findings suggest a tension between the promotion of religious diversity and the explicit recognition of religious-based bullying. Although the reviewed documents commonly endorse inclusion, respect, and diversity, religious-based bullying often remains implicit rather than directly addressed. With the exception of the Cypriot documents, bullying of this nature is generally situated within broader Equality, Diversity and Inclusion (EDI) frameworks influenced by the supranational level. This finding reflects broader global and European policy trends where religion is typically incorporated within wider diversity and inclusion agendas rather than addressed through standalone anti-bullying measures (Eurydice, 2023; UNESCO, 2020). Indeed, UNESCO (2020) advocates that religion is a risk factor for bullying that is usually addressed through broader inclusion strategies rather than as a separate policy area. This pattern may reflect the influence of supranational policy agendas, broad EDI frameworks, and differing national approaches to religion within education. Understanding how these dynamics are enacted at school level remains a critical area for future investigation. The reason Cyprus might be an exception within our data could reflect the prominence of religion within educational and national identity debates in Cyprus, where questions of religious diversity and religious education occupy a more visible place in policy discourse (Latif, 2022).

Our findings highlight a convergence in national policy approaches, with documents closely mirroring principles promoted at the supranational level. However, we found that the implementation at the subnational dimension varies. This is partly due to differing implementation mechanisms reflecting diverse education systems, including, often non-existent, monitoring and accountability measures, which highlight limitations in the reviewed documents. Differences in institutional capacity may further influence policy implementation at the subnational level, as effectiveness depends not only on local governance capabilities but also on the extent of inter-sectoral coordination and engagement with civil society and third-sector organisations (Bozic & Gutzwiller-Helfenfinger, 2023). Moreover, implementation also depends on how schools interpret and enact policy, reflecting their ethos and general school climate. Research on anti-bullying policy implementation across European countries demonstrates that local school boards and regional education authorities significantly influence the

fidelity and intensity with which supranational and national anti-bullying frameworks are operationalised (Olweus & Limber, 2010; Støen et al., 2024).

Policy Responses to Religious Diversity

National responses to religious diversity are shaped by differences in church-state relationships and historical traditions (Bråten, 2015). Consequently, the extent to which religion is overtly recognised within national policies related to schools varies across Europe. Our data shows that in countries where religion retains a visible role within public education (for example Cyprus and Norway), policymakers may be more likely to acknowledge religion as a distinct dimension of identity and potential source of discrimination. Conversely, in more secular contexts (for example Portugal and Switzerland), concerns relating to religion may be incorporated within broader equality and anti-discrimination frameworks, resulting in less explicit attention to religious-based bullying and inclusion. European education systems have experienced increasing convergence around principles of inclusion and diversity. However, longstanding national traditions continue to influence how religion is represented within curriculum policy and school governance (Meehan et al., in press). As a result, religion may be more visible as a policy concern in some contexts than in others, even where countries operate within shared European policy frameworks. This raises important questions regarding whether universal approaches to inclusion are sufficient for recognising and responding to forms of victimisation linked specifically to religion and belief.

Teachers as Policy-Enactors

Bråten's model scales down to the subnational dimension and does not focus specifically on educators/teachers who are directly responsible for the implementation of national policies inspired by the supranational dimension. However, the literature (e.g., Izadi & Hart, 2024; O'Higgins Norman et al., 2022) and our findings demonstrate that schools have different capacity to effectively address issues related to bullying within classrooms and the wider school environment. This in part depends on teacher training, an aspect that has been repeatedly identified as one of the limitations for policy implementation (Cunningham et al., 2016). Research indicates that professional development focusing on intercultural skills and religious literacy enhances teachers' capacity to manage diversity effectively, fostering respectful classroom climates (Lucas et al., 2008).

Since all nine countries, bar Cyprus, do not have policies specifically related to religious-based bullying, it is unlikely that subject specific teachers are trained in religious literacy or in addressing bullying through prejudice reduction and counterstereotypes, as suggested by Fandrem and Skeie (2024). Yet, at the instructional level, teachers' practices, training, and classroom interactions operationalise policy principles. Accordingly, this gap directly impacts teachers' practices in the classroom. Positive environments characterised by respect, participation, and social-emotional learning tend to have lower instances of bullying and discrimination, especially related to religion and cultural differences (Cucoş et al., 2023). Conversely, environments marked by segregation or hegemonic narratives may reinforce exclusion and hostility.

Stakeholder Engagement

The effective enactment of supranational principles at the subnational level requires national policies to incorporate robust statutory guidance on implementation, monitoring, and evaluation. These processes facilitate the continuous adaptation of policies and practices in response to emerging weaknesses and gaps. Such responsiveness is particularly important in educational settings, where shifting social dynamics and patterns of diversity may outpace the formal revision of policy frameworks. Consequently, evidence from our data supports the view that implementation and evaluation mechanisms need to draw on stakeholder views, including educators, students, parents/carers, and the wider school community to identify required practical support (e.g., O'Brien & Doyle, 2023).

Data from the reviewed documents did not provide insight to the experiential level of Bråten's framework. Evaluation methods across the documents are more related to the institutional procedural aspect rather than the experiential level. This is an area for further research with members of the school community. Such research could feed into the experiential level of religious-

based bullying and inclusion and contribute to a greater understanding of prevalence and how religious-based bullying is reflected in everyday school experiences.

The transfer of policies from documents to practice not only depends on implementation and evaluation at the subnational dimension. It also requires another dimension that explores the values and capabilities of the wider school community (stakeholders). We term this “The Personal Dimension”, reflecting the collective responsibility of all stakeholders to uphold policies and respect others within shared spaces.

The diversity of countries included in this study highlights a range of implementation and evaluation practices, some of which may be transferable across contexts. Since these policies are grounded in common supranational principles, greater inter-institutional dialogue could support the exchange of best practice between countries and regions. This process of mutual learning may enhance the capacity of national and subnational actors to implement, monitor, and refine policies more effectively.

Conclusion: Implications for Practice and Future Research

Our study provides a cross-national analysis of how policies used by educational systems in nine European countries address religious-based bullying, diversity and inclusion. Using Bråten’s (2015) *Multi-Dimensional Framework*, our findings demonstrate a high degree of alignment with supranational principles of human rights, equality, inclusion, and respect for diversity. Across national contexts, religion is generally recognised as part of broader commitments to democratic citizenship and social cohesion. Despite these shared commitments, religious-based bullying is rarely identified as a distinct policy concern. Instead, it is typically embedded within broader EDI and anti-bullying frameworks, with Cyprus emerging as an exception. The findings further suggest that policy effectiveness depends not only on the principles articulated in national documents but also on the capacity of schools and educators to translate them into practice. Variations in implementation guidance, teacher training and local school contexts contribute to variations in policy enactment across countries. This underscores the importance of strengthening religious literacy and professional development regarding work with the learning environment, particularly in subjects like religion, as well as implementation support within educational systems.

A key limitation, with reference to Bråten’s (2015) framework, is the lack of evidence regarding the experiential level. While policies express intended outcomes, they reveal little about how stakeholders actually experience religious-based bullying, diversity and inclusion in everyday school life. Thus, there is a critical need for empirical research exploring these experiences to provide important insights into the effectiveness of current policies, identify gaps between policy intentions and practice, and inform the development of more inclusive and responsive approaches to preventing religious-based bullying in schools.

Declarations

Competing Interests

Niamh O'Brien is an Editorial Manager for International Journal of Bullying Prevention

Author Contribution

All authors agreed on the research topic and scope including the research question. All authors participated in data collection. SV, AB and LB drafted and refined the literature review. NOB, GBA and SB drafted and refined the methodology and led and wrote up the analysis and the findings. NOB and GBA wrote the Discussion. HF wrote the conclusion and abstract. LB gathered the references and compiled the reference list. EG and AD provided critical reads and refining of the manuscript. NOB collated author feedback and edited the final submission. All authors reviewed the manuscript.

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Data Availability

All data supporting the findings of this study are available within the paper and its Supplementary Information.

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