

Intercultural Communication Education, 3 (2), 75-95 (2020)
<https://doi.org/10.29140/ice.v3n2.286>

Errors by Simpson and Dervin (2019) in their Description of the Council of Europe's Reference Framework of Competences for Democratic Culture



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Abstract

In a recent paper, Simpson and Dervin (2019a) offer a radical critique of the Council of Europe's *Reference Framework of Competences for Democratic Culture* (RFCDC). However, Simpson and Dervin's paper contains numerous factual errors, interpretative errors and category errors in its description of the RFCDC. We identify 12 such errors which invalidate the conclusions drawn by them. We correct all of these errors, and suggest that, rather than using Simpson and Dervin's paper as a source of information about the RFCDC, readers should read the RFCDC itself, before drawing their own conclusions about the RFCDC and the adequacy of the arguments offered by Simpson and Dervin.

Keywords: democracy, intercultural dialogue, democratic competence, intercultural competence, education for democratic citizenship

Introduction

In 2018, the Council of Europe (CoE) published the *Reference Framework of Competences for Democratic Culture* (RFCDC) (Council of Europe, 2018a, 2018b, 2018c). The RFCDC offers a set of materials which can be used by education systems to equip learners with the competences that are required to defend and promote human rights, democracy and the rule of law, and to live peacefully with others in culturally diverse societies. The RFCDC is intended for use by education policy makers and education practitioners, and it covers all levels of formal education from pre-school through to higher education. It provides a systematic approach to designing the teaching, learning and assessment of the competences required for democratic culture and intercultural dialogue.

Simpson and Dervin (2019a) have offered a radical critique of the RFCDC. They argue that there are

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Data Availability Statement: All relevant data are within this paper.

different and contradictory voices present within the texts of the RFCDC, that the “other” is hierarchically marginalised and stigmatised by the discourses employed by the RFCDC, and that the RFCDC disguises Eurocentrism, which it wishes to impose beyond Europe, under intercultural correctness. However, the arguments used by Simpson and Dervin to establish these conclusions contain numerous errors. Here we identify some of these errors and correct them, in order to rectify any misunderstandings about the RFCDC that readers of Simpson and Dervin’s paper might derive from reading their paper.

There are three types of error in Simpson and Dervin’s paper: factual errors, interpretative errors, and category errors. Factual errors are the simplest errors to identify. They can be easily corrected by juxtaposing statements from Simpson and Dervin’s paper alongside statements taken from the source document that is supposedly being described, or alongside statements from other related documents or sources which reveal that Simpson and Dervin have misrepresented the issues.

Interpretative errors are more insidious and are likely to be harder for readers of Simpson and Dervin’s paper to identify because they involve interpretations of statements in the text of the RFCDC, and their identification therefore requires knowledge of that text. For this reason, it is particularly important to correct these misinterpretations, because these are errors that can be easily replicated and promulgated by other scholars who rely on Simpson and Dervin’s paper for their knowledge of the RFCDC. We therefore urge our readers to read the text of the RFCDC for themselves and construct their own understanding, without relying on the erroneous description provided by Simpson and Dervin.

Simpson and Dervin’s paper also contains category errors. A category error involves representing something as belonging to one logical type or category when it actually belongs to another, and as a consequence ascribing features to it which can only be ascribed to something that belongs to a different category (Ryle, 1949). Simpson and Dervin (2019a) make some fundamental category errors in their paper.

In the following, we discuss 12 errors that we have identified in Simpson and Dervin’s paper. These are not the only errors, but are the ones that we judge to be most in need of correction. We then leave to readers to read the RFCDC, to judge for themselves the adequacy of the arguments made by Simpson and Dervin, and to draw their own conclusions.

Error 1 (factual): The statement that a shift took place in the development of the RFCDC in 2015 from the intercultural to democracy

On the second page of their paper, Simpson and Dervin make the following statement about the project through which the RFCDC was developed, without offering any evidence or argument to support it:

The initial focus of the project was the intercultural, however this later shifted to democracy in summer 2015—following the mass arrival of asylum seekers in Europe.
(Simpson & Dervin, 2019a, p. 103)

This statement is a factual error. The RFCDC project originated in a political initiative by the member State of Andorra when it held the Chairmanship of the Committee of Ministers of the CoE from November 2012 until May 2013. When Andorra took up the Chairmanship, the Andorran minister for Foreign Affairs, Gilbert Saboya Sunyé, announced:

Education in human rights, democracy and the rule of law, the Council of Europe essential values, is the top priority of the Chairmanship of the Committee of Ministers

of the Principality of Andorra. [...] The Andorran Chairmanship will carry out a number of activities relating to education for democratic citizenship and human rights, with a particular focus on youth.

(Council of Europe, 2012)

Thus, from the outset, education for democratic citizenship was a key component of the political initiative that led to the production of the RFCDC. In order to pursue this priority, a conference involving the Ambassadors of the CoE's 47 member States, as well as representatives from the Parliamentary Assembly of the CoE, took place in Andorra La Vella in February 2013. The conference was entitled "Competences for a culture of democracy and intercultural dialogue: A political challenge and values." Thus, in the title of the conference, the terms "democracy" and "intercultural dialogue" appeared together. A wide range of issues was discussed at the conference, but especially how education can be used to promote the competences that young people need in order to become active and responsible citizens within open democratic societies (van't Land, 2013). The conference also explored the idea that the CoE should develop a new reference framework of the competences that learners require for democratic culture and intercultural dialogue. In the conference conclusion, Snežana Samardžić-Marković, the CoE's Director General of Democracy, stated that competences for a culture of democracy and intercultural dialogue are fundamental to societies today, that these competences should be promoted by formal education systems within Europe, and that work on developing the reference framework should be included in the CoE's programme for 2014–15. The establishment of the RFCDC expert group in the autumn of 2013, tasked with developing the reference framework, was the direct consequence of this conference conclusion.

In short, there was a twin focus on both democracy and intercultural dialogue from the very inception of the project. There was no shift in the focus of the project away from the intercultural and towards democracy in 2015 due to the mass arrival of asylum seekers in Europe, contrary to Simpson and Dervin's unsubstantiated assertion.

Error 2 (interpretative): The suggestion that the concept of democratic competence is used interchangeably with the concept of intercultural competence in the RFCDC

This interpretative error is also on the second page of Simpson and Dervin's paper, where they state that:

... the authors of the [RFCDC] volumes focus on defining, measuring and promoting the idea of democratic competence, which appears to be used interchangeably with intercultural competence.

(Simpson & Dervin, 2019a, p. 103)

However, the RFCDC does not use the terms "democratic competence" and "intercultural competence" interchangeably with each other, neither in "appearance" nor in fact. Furthermore, there are separate definitions of both "democratic competence" and "intercultural competence" in the RFCDC:

For the purposes of the Framework, the term "competence" is defined as the ability to mobilise and deploy relevant values, attitudes, skills, knowledge and/or understanding in order to respond appropriately and effectively to the demands, challenges and opportunities that are presented by a given type of context.

Democratic situations are one such type of context. Thus, "democratic competence" is the ability to mobilise and deploy relevant psychological resources (namely values,

attitudes, skills, knowledge and/or understanding) in order to respond appropriately and effectively to the demands, challenges and opportunities presented by democratic situations. Likewise, “intercultural competence” is the ability to mobilise and deploy relevant psychological resources in order to respond appropriately and effectively to the demands, challenges and opportunities presented by intercultural situations.

(Council of Europe, 2018a, p. 32) ⁱ

If “democratic competence” and “intercultural competence” were used interchangeably within the RFCDC, there would be no need to distinguish between the two terms in this way.

Note that the definition of intercultural competence provided by the RFCDC refers to “intercultural situations,” which are explicitly defined on the preceding page:

intercultural situations arise when an individual perceives another person (or group of people) as being culturally different from themselves. When other people are perceived as members of a social group and its culture rather than as individuals, then the self is also usually categorised—and may present itself—as a cultural group member rather than in purely individual terms. Intercultural situations, identified in this way, may involve people from different countries, people from different regional, linguistic, ethnic or faith groups, or people who differ from each other because of their lifestyle, gender, age or generation, social class, education, occupation, level of religious observance, sexual orientation, and so on.

(Council of Europe, 2018a, p. 31)

There is no reference to either democracy or democratic competence within this definition, precisely because the intercultural and the democratic are distinct concepts within the RFCDC. This also means that democratic competence can be used in situations which are not intercultural because the individuals in those situations do not perceive their interlocutors as being culturally different from themselves.

However, although distinct, there is a relationship between democratic competence and intercultural competence in the case of citizens who live within culturally diverse democratic societies. This issue is addressed explicitly in the RFCDC:

In culturally diverse societies, democratic processes and institutions require intercultural dialogue. A fundamental principle of democracy is that those affected by political decisions are able to express their views when decisions are being made, and that decision makers pay attention to their views. Intercultural dialogue is, first, the most important means through which citizens can express their views to other citizens with different cultural affiliations. It is, second, the means through which decision makers can understand the views of all citizens, taking account of their various self-ascribed cultural affiliations. In culturally diverse societies, intercultural dialogue is thus crucial for ensuring that all citizens are equally able to participate in public discussion and decision making. Democracy and intercultural dialogue are complementary in culturally diverse societies.

(Council of Europe, 2018a, p. 24)

The RFCDC thus views intercultural competence as an essential component of democratic competence when citizens live within culturally diverse democratic societies. However, democratic competence requires not only intercultural competence—it additionally requires values, attitudes and knowledge

specific to democracy, such as valuing democracy, justice and the rule of law, attitudes such as civic-mindedness and responsibility, and knowledge and critical understanding of politics and law. Democratic competence also requires skills that are present in intercultural competence, such as co-operation skills and conflict-resolution skills. There is therefore overlap between democratic and intercultural competences. This means that where citizens live within culturally diverse democratic societies, intercultural competence is necessary but not sufficient; democratic competence is also needed.

In short, the concept of democratic competence is not used interchangeably with the concept of intercultural competence in the RFCDC, contrary to Simpson and Dervin's statement.

Error 3 (factual): The statement that the model underlying the RFCDC is Byram's model of intercultural competence

Simpson and Dervin (2019a) assert twice in their paper that the model that underlies the RFCDC is Byram's model of intercultural competence:

[...] the basis of the model behind the Framework under review (Byram's work) [...] (Simpson & Dervin, 2019a, p. 109)

[...] as is evident in the liberal approach to democracy in this document [i.e., the RFCDC] and the underlying models of intercultural competence (Byram, 1997). (Simpson & Dervin, 2019a, p. 115)

There is, first, some ambiguity in the second statement which refers to plural "models" and then cites only Byram (1997). More importantly, these statements, with their imprecise notions of "behind" and "underlying" are factually incorrect if they imply that only Byram's model was used in the identification of elements for inclusion in the RFCDC model.

In fact, as has been reported in Council of Europe (2016), a publication to which Simpson and Dervin do not make reference, the contents of the model were developed through a process that began with an audit of existing conceptual schemes of democratic competence, civic competence and intercultural competence. In total, 101 competence schemes were audited (see Council of Europe, 2016, Appendix A). Byram's (1997) model was one of the schemes that was included in this audit, in which specific criteria were used to identify the core competences contained across the 101 schemes. Full details of these criteria are provided in Council of Europe (2016). A conceptual model based on these core competences was produced, and a document describing the RFCDC model was written, and then submitted to an international consultation involving academic experts, education practitioners and policymakers, including experts nominated by the education ministries of the CoE's member States. The model was strongly endorsed in the consultation. Byram's model was not privileged over other models in any way during this process; its components were included in the RFCDC model only because they met the appropriate criteria.

The model that resulted from this development process (see Figure 1) contains twenty specific elements that learners need to acquire in order to act as interculturally competent democratic citizens. As can be seen from the figure, the twenty elements fall into four categories: values, attitudes, skills, and knowledge and critical understanding. Each of these 20 elements is described in detail in Council of Europe (2016, 2018a). It should also be noted that, contrary to Simpson and Dervin's statements, many of the elements included within the RFCDC are not present in Byram's (1997) model, which is not a model of democratic competence but a model of those elements of intercultural communicative

competence that Byram considers to be teachable and assessable in the language classroom.

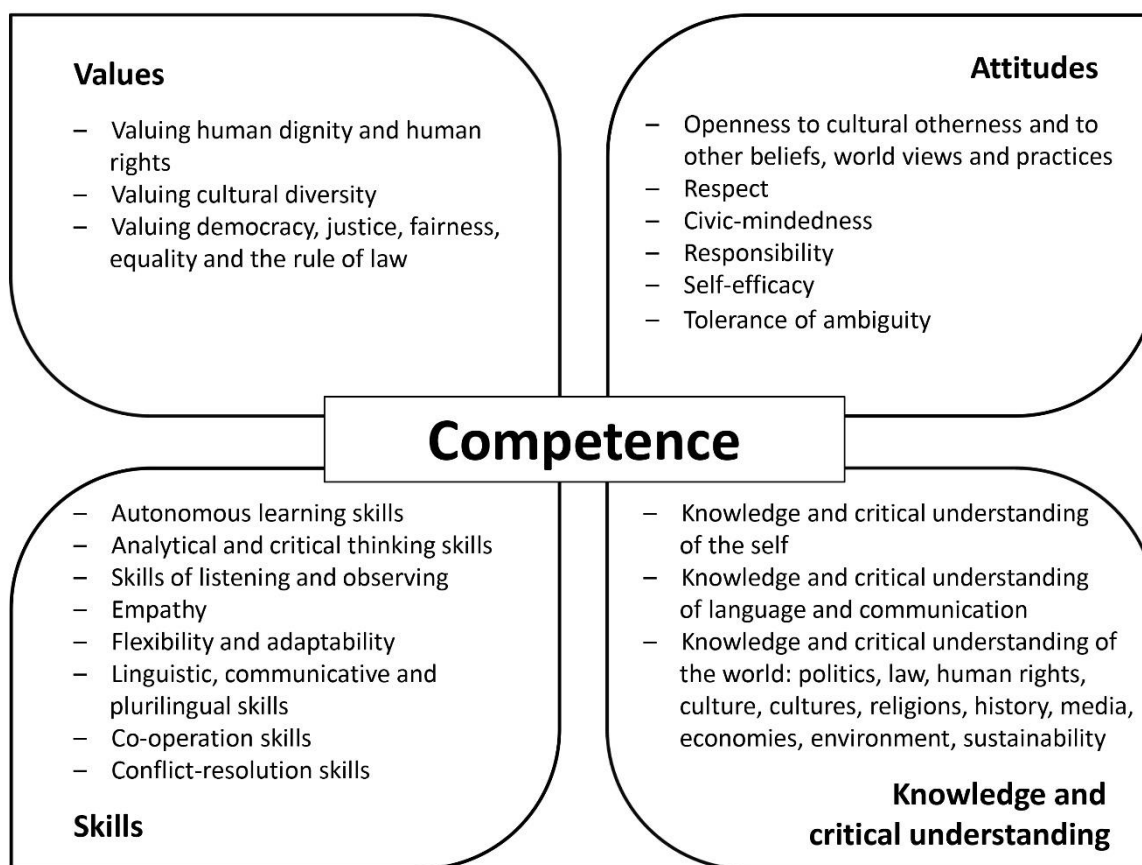


Figure 1. The competence model proposed by the RFCDC (Figure reproduced from Council of Europe (2016) © Council of Europe, reproduced with permission.)

In short, Simpson and Dervin are factually incorrect in their claim that Byram’s model forms the “underlying” basis of the RFCDC competence model. Byram’s model was just one of 101 models of intercultural competence, democratic competence and civic competence that were used to construct the RFCDC model.

Error 4 (factual): The claim that the word “identity” is not used abundantly in the RFCDC

Simpson and Dervin criticise the RFCDC for not using the term “identity” sufficiently:

Maybe without much surprise, and because of the Council of Europe’s parlance, the word identity is not used abundantly in the volumes. In Volume 3, the word identity appears eight times [...]; in Volume 2, twice [...]; and in Volume 1 four times
(Simpson & Dervin, 2019a, p. 107)

We have run electronic word counts on the three volumes of the RFCDC to check the veracity of Simpson and Dervin’s statement. We suggest that, if the aim is to establish the extent to which the *concept* of identity is discussed, the word count should include not only the word “identity” but also

the word “identities” (especially because a key claim made by the RFCDC is that individuals have multiple identities). Doing so yields 15 mentions of the concept in Volume 1 (Council of Europe, 2018a), not 4. In addition, the word count should include the words “identification” and “identify” in cases where these words are used in connection with personal, social, cultural or collective identities. This yields a further four mentions. Thus, the concept of identity is actually referred to 19 times in Volume 1 (not four times, as claimed by Simpson and Dervin). Repeating the exercise on Volume 3 (Council of Europe, 2018c) yields 14 references to the concept of identity (not eight, as claimed by Simpson and Dervin). The number of references in Volume 2 (Council of Europe, 2018b) is irrelevant, because this volume reports the descriptors for the 20 competences in the RFCDC conceptual model and Simpson and Dervin misunderstand the nature of the descriptors (as we shall explain later when we discuss category errors).

In short, Simpson and Dervin substantially underestimate the number of references to personal, social, cultural, or collective identities that are present in Volumes 1 and 3 of the RFCDC.

Simpson and Dervin go on to say in the same paragraph:

It is interesting to note that words such as belonging, citizenship or together are used more often.

(Simpson & Dervin, 2019a, p. 107)

However, performing a word count on “belonging” in Volume 1 reveals that it only occurs eight times, and “together” (as in the phrase “living together” and excluding cases where the term appears in the titles of publications and in phrases such as “drawing the results together”) also occurs only eight times in Volume 1 (Council of Europe, 2018a), less often than the 19 references to the concept of identity. The term “citizenship,” of course, does appear many more times than all of the other terms, but this is because the RFCDC is a text about education for democratic citizenship, not about identity.

However, having pointed out these factual errors in Simpson and Dervin’s word counts, we would argue that these counts are not a particularly pertinent criticism of the RFCDC. This is because, as we have just noted, the RFCDC was intended to be a text about citizenship education, not identity. Criticising the text for discussing citizenship more frequently than identity is therefore jejune.

In short, Simpson and Dervin report incorrect and misleading word counts, which are moreover irrelevant for judging either the internal consistency or the usefulness of the RFCDC for its intended purpose.

Error 5 (factual): The statement that the RFCDC is unclear about whether individuals have multiple identities

Simpson and Dervin (2019a) assert that the formulation of the following statement, which they claim to have taken from the RFCDC, is unclear in its implications:

“Social identities are instead based on memberships of social groups are a particular type of social identity and are central to the concerns of the Framework” (Council of Europe, 2018a, p. 29). (sic)

(Simpson & Dervin, 2019a, p. 107)

Specifically, they claim that this statement from the RFCDC:

does not allow us to decide if the plural of membership refers to a single individual's multiple social groups or to different individuals' groups. In other words, what is unclear [...] is if multiple internal and group identities are "permissible" according to the document.

(Simpson & Dervin, 2019a, p. 108)

However, the statement that they purportedly quote to support this conclusion has not been taken from the RFCDC. It is in fact a corrupted reduction of the following sentence:

Social identities are instead based on memberships of social groups (e.g. a nation, an ethnic group, a religious group, a gender group, an age or generational group, an occupational group, an educational institution, a hobby club, a sports team, a virtual social media group); cultural identities (the identities that people construct on the basis of their membership of cultural groups) are a particular type of social identity, and are central to the concerns of the Framework.

(Council of Europe, 2018a, p. 29)

When cited accurately, this statement is not unclear in its meaning, especially when it is read alongside other accompanying statements in the RFCDC which say explicitly that single individuals belong to multiple social groups and cultures, such as the following:

all people belong to multiple groups and their cultures but participate in different constellations of cultures, so that the ways in which they relate to any one culture depend, at least in part, on the points of view that are present in the other cultures in which they also participate.

(Council of Europe, 2018a, p.30)

any social group can have a culture and all cultures are dynamic and constantly change over time as a result of internal and external factors. All people belong to multiple groups and their cultures, and participate in different constellations of cultures.

(Council of Europe, 2018a, p.73)

In short, by misquotation, Simpson and Dervin obfuscate an issue that is transparent in the RFCDC.

Error 6 (factual): The statement that the RFCDC has been integrated in education in Andorra, Croatia, Georgia and the Slovak Republic

Another factual error made by Simpson and Dervin (2019a) concerns the countries in which the RFCDC has been implemented. They state:

[...] the Framework has been integrated in education in Andorra, Croatia, Georgia and the Slovak Republic (Council of Europe website, 2018).

(Simpson & Dervin, 2019a, p. 104)

In fact, only one of these four countries, Andorra, is mentioned on the webpage that they reference. It is, of course, possible that the contents of the webpage have changed since they consulted it. But irrespective of the origins of this error, we are able to provide a more accurate and up-to-date overview of the current position regarding implementation of the RFCDC. Our information comes from two sources: a survey by the CoE's Education Policy Advisers Network (EPAN) and the CoE's Democratic Schools Network (DSN) website.

The EPAN survey, conducted in April 2019, was designed to ascertain the extent to which the CoE member States were implementing the RFCDC at that point in time. The survey revealed that the RFCDC had already been implemented in whole in Andorra, was in the process of being implemented in whole in Azerbaijan, Belarusⁱⁱ, Cyprus, Finland, Greece, Moldova, Montenegro, Portugal, San Marino, Serbia and Ukraine, and was in the process of being implemented in part in Belgium (French-speaking community), Italy, Latvia, North Macedonia and Romania (Council of Europe, 2019).

The CoE launched the DSN in November 2018, and schools in the CoE's member States may join the DSN if they have implemented a project using the RFCDC. At the time of writing (March 2020), the DSN website reveals that, in addition to the 17 countries listed above, individual schools in a further 15 countries are currently using the RFCDC: in Bosnia and Herzegovina, Bulgaria, Croatia, France, Georgia, Germany, Ireland, Lithuania, Netherlands, Norway, Poland, Republic of Moldova, Russian Federation, Turkey, United Kingdom (Council of Europe, 2020).

In short, contrary to the statement made by Simpson and Dervin, which states that the RFCDC has been integrated in education in four countries, the RFCDC has only been integrated in the national education system of one country, but is being implemented in 16 other countries and is being used by schools in a further 15 countries.

Error 7 (factual): The statement that the RFCDC includes 135 descriptors

Simpson and Dervin (2019a) state that the RFCDC includes 135 descriptors:

Volume 2 [of the RFCDC] includes one hundred and thirty-five competence descriptors

(Simpson & Dervin, 2019a, p. 112)

In fact, Volume 2 of the RFCDC (Council of Europe, 2018b) contains 447 descriptors.

All 447 descriptors were validated empirically, but it was judged that 447 descriptors (more than 20 descriptors per competence on average) would be daunting for teachers to use in the classroom. Therefore, a limited number of "key descriptors" was identified which would indicate for each competence three levels of proficiency (basic, intermediate, and advanced).

The figure of 135 is the number of key descriptors, which are listed in Chapter 1 of Volume 2. The full list of 447 descriptors appears in Chapter 2.

In short, Simpson and Dervin's statement that Volume 2 of the RFCDC includes 135 descriptors is factually incorrect.

Error 8 (category error): Treating the descriptors as if they are theoretical statements

Category errors (Ryle, 1949) underpin several of Simpson and Dervin's arguments, and these errors reveal their fundamental misunderstanding of the RFCDC. The first category error to note is their treatment of the RFCDC descriptors as if they were theoretical statements about the nature of culture, identity, interculturality, etc. Descriptors are not theoretical statements but indicators of proficiency. Simpson and Dervin use their misinterpretation of the nature of descriptors to argue that there are internal contradictions within the text of the RFCDC.

Simpson and Dervin repeat this error throughout their paper. For example, after listing some examples of statements from the RFCDC in their Table 1 (p. 107), they state that:

Seemingly contra an understanding identity (sic) from the position of the self which is present in Examples 1, 2 and 3, Example 4 offers a different ideological refraction.
(Simpson & Dervin, 2019a, p. 108)

However, examples 1, 2 and 3 are theoretical statements taken from Volume 1 of the RFCDC (Council of Europe, 2018a), whereas example 4 is a descriptor, taken from Volume 2 (Council of Europe, 2018b). Example 4 therefore belongs to a different logical category from the theoretical statements that are given as Examples 1, 2, and 3, and is not comparable to them.

Another example is in Simpson and Dervin's Table 3 (p. 112). Here they list five descriptors and argue that there are contradictions among them. For example, they state that:

The relationship between Example 2 and Example 3 can be marked as Janusian perspective (sic). Dervin (2016) articulates the Janusian approach: "A Janusian approach to interculturality is usually contradictory. It consists in both uttering stereotypes about a group and suggesting that the members of this group have multiple identities—thus cancelling out the stereotype" (p. 115).
(Simpson & Dervin, 2019a, p. 112)

However, once again, this rather convoluted argument (which simply says that examples 2 and 3 contradict each other) assumes that the descriptors are making theoretical claims about the nature of interculturality, stereotypes and identities. This is fallacious reasoning, because the descriptors are not theoretical statements. They are empirically derived proficiency indicators, and it is not only possible but also highly likely that some subsets of the descriptors will conflict with one another (as we shall explain below).

The concept of proficiency, and the nature of the descriptors, are explained in detail in several places in the RFCDC, including Chapter 7 in Volume 1, the Introduction to Volume 2, and Chapter 3 of Volume 3. It is helpful to quote directly from the RFCDC, where descriptors are explained in the following way:

the Framework provides descriptors for each of the 20 competences that are contained in the competence model. These descriptors help to operationalise the competences and provide important and useful tools for curriculum planning, teaching and learning, and assessment. Competence descriptors are statements that describe observable behaviours which indicate that the person concerned has achieved a certain level of proficiency with regard to a competence.

(Council of Europe, 2018a, p.59)

The final sentence here is the crucial one—the descriptors are proficiency indicators (not theoretical statements).

The descriptors were derived empirically from teachers' judgements, using a similar procedure to that used for developing the descriptors of the *Common European Framework of Reference for Languages* (CEFR) (Council of Europe, 2001; see North, 2000, and North & Schneider, 1998). Briefly, the procedure began with an audit of existing education policy documents, curricula documents, psychometric scales and research documents that contained potentially suitable statements about

learning outcomes and behaviours that could be matched to one of the twenty competences. In total, 98 source documents were audited. Statements and scale items found in these documents were extracted and rephrased to construct short statements that could potentially serve as descriptors.

Initially, 2,085 descriptors were written. These draft descriptors were evaluated using a series of rating and validation tasks involving teachers, teacher educators and other education professionals across Europe recruited through the education ministries of the CoE's member States. These participants were asked to assign subsets of the draft descriptors to their relevant competences (to ensure that each descriptor mapped unambiguously onto only one competence), to rate the draft descriptors against three criteria (clarity, concreteness, and observability in an education setting), and to rate the usefulness of each draft descriptor for different levels of education. The data were used to identify the descriptors that had received the highest ratings on the various criteria.

These highly rated descriptors were then taken forward into the next phase of the work, in which teachers were asked to conduct relevant activities with learners in their classes, and then to rate individual learners' behaviour within those activities using specified subsets of the descriptors. The data were used to scale the descriptors statistically based on Rasch modelling (Bond & Fox, 2015). The scaling procedure revealed three levels of proficiency – basic, intermediate and advanced (as opposed to the six levels of proficiency identified when the CEFR was developed).

In total, 3,094 education professionals in 53 countries participated in this work. The 447 descriptors mentioned above were the ones which had high validity, were judged to be useful by teachers for educational purposes and could be placed on a scale with satisfactory reliability.

Thus, contrary to the interpretation of Simpson and Dervin (2019a), the descriptors provided by the RFCDC are not theoretical statements made by the RFCDC about culture, identity, citizenship or any other topic. They are empirically derived proficiency indicators that describe learners' levels of proficiency in the use of the 20 competences. To interpret them as theoretical statements made by the RFCDC is to commit a category error.

Furthermore, it is entirely possible for proficiency indicators to contradict one another, because the behaviours of an individual learner, as observed and assessed by their teacher, may not always be consistent. Indeed, it is highly likely that learners, at particular points in development, produce different behaviours in different contexts or towards different people (e.g., family members vs. peers, classmates vs. teachers, members of ingroups vs. outgroups, etc.). There is very good evidence that all human behaviour is variable, depending on both situational contingencies and the characteristics of the other individuals who are present within situations (Hogg & Vaughan, 2017). As descriptive statements about how learners behave in different situations, it is to be expected that there will be some contradictions among different subsets of the descriptors.

In addition, there are likely to be contradictions between descriptors at the basic level (which represent a rudimentary level of proficiency) and descriptors at the advanced level (which represent a sophisticated level of proficiency). It is therefore not surprising that the proficiency indicators describing a six-year-old's competences are different from those describing a 20-year-old's competences. This does not mean that there are internal contradictions between the theoretical statements that comprise the RFCDC.

It is noteworthy that, in another paper, Simpson and Dervin (2019b) identify four different types of descriptor in the RFCDC. These types are what they call monological non-negotiable ethics, pseudo-dialogical façade non-normative ethics, partial dialogism normative ethics, and calls for

dialogism/non-normative ethics. In that paper, they argue that these four categories represent “different and contradictory voices” (Simpson & Dervin, 2019b, p. 12) in the descriptors. This analysis is interesting, and it would be fascinating to try to categorise all 447 descriptors of the RFCDC into the four categories to ascertain whether each descriptor can be reliably categorised in this fourfold way, and whether these four categories are exhaustive or whether other categories of descriptors are also present in the RFCDC. It would also be fascinating to know whether some of these categories occur more frequently among the basic level descriptors and others among the advanced level descriptors, and whether the four categories of descriptors are differentially associated with any of the four classes of competences (i.e., values, attitudes, skills, or knowledge and critical understanding). We would in fact expect such differences. Unfortunately, Simpson and Dervin (2019b) fail to pursue these interesting avenues of exploration, instead preferring to use the differences between the categories to argue (yet again fallaciously) for the presence of contradictions within the RFCDC.

In short, by treating the contents of descriptors as if they were theoretical statements and comparing them to genuine theoretical statements, and by concluding that there are different and contradictory voices present within the texts of the RFCDC, Simpson and Dervin are committing a category error. It is also a category error to argue that, because some descriptors contradict each other, the RFCDC is internally self-contradictory. On the contrary, it is to be expected that some of the descriptors/proficiency indicators will contradict each other, precisely because human behaviour is rarely consistent across contexts and because different subsets of the descriptors in the RFCDC indicate different levels of proficiency.

Error 9 (category error): Treating the name of a competence as a theoretical statement

Another category error perpetrated by Simpson and Dervin (2019a) occurs in the context of their comparison of five “examples” listed in their Table 2 (p. 110). The first example in this table is actually the name of one of the 20 competences in the RFCDC model, “Openness to cultural otherness and to other beliefs, world views and practices.” This phrase is neither a theoretical statement nor is it a descriptor. It is not even a sentence. It is a noun phrase without an accompanying verb phrase that has been taken from a third logical category, the names of competences. The second example in the table is a descriptor. This is followed by three further examples, all of which are lengthy extracts of text from Volume 3 of the RFCDC (Council of Europe, 2018c). Example 1, Example 2 and Examples 3, 4, and 5 are therefore drawn from three different logical categories. However, ignoring this fact, Simpson and Dervin go on to argue that “The relationship between Examples 1 and 2 is ambiguous and perhaps even contradictory” (Simpson & Dervin, 2019a, p.110). They also argue that Example 5 could be contradictory to Example 1, and that Example 2 is “shown through a different light in relation to Examples 3, 4, and 5” (ibid., p. 111), a phrase which is at best difficult to interpret. However, these comparisons and claims assume that the five examples are drawn from the same logical category. They are not.

In short, in drawing their conclusions about these examples, Simpson and Dervin are again making fallacious comparisons between statements that belong to different logical categories. They are once again committing category errors.

Error 10 (interpretative): The claim that the RFCDC stigmatises and marginalises the other/Other through its discourses of democracy

At the end of their analysis of these five examples in their Table 2, Simpson and Dervin conclude by stating that, in the RFCDC:

the other is marginalized and stigmatized through discourses about democracy. Europe is hierarchically positioned as having no falsehoods, no propaganda and no distortions of truth, contra the Other. Thus, the language found within these examples serves not only to *other* the Other but also to sanitize the political through restricting how the political can be understood and expressed (through the demarcation of what is permissible and what is not) and thus making it obedient politics.

(Simpson & Dervin, 2019a, p. 111)

The argument that leads Simpson and Dervin to this generalisation about “the other/Other” (both upper and lower case are used for no apparent reason) and “the political” involves an analysis of three extracts drawn from the guidance chapter on *Building resilience to radicalisation leading to violent extremism and terrorism* in Volume 3 of the RFCDC (Council of Europe, 2018c). Perhaps somewhat inconveniently for their argument, it is explicitly stated near the beginning of this chapter that:

in this chapter, we are concerned solely with radicals who advocate or use violent extremism or terrorism to try to achieve social or political change.

(Council of Europe, 2018c, p. 103)

It is also explicitly stated near the beginning of this chapter that it adopts a human rights perspective on violent extremism and terrorism. This means that in the case of extreme beliefs or practices:

if the behaviour that is associated with an extremist position does not violate or undermine the human rights of other people, or does not aim to introduce non-democratic social or political change, then that position should be respected. Under the European Convention on Human Rights, individuals who adopt an extremist position are entitled, like everyone else, to freedom of thought, conscience and religion, freedom of expression and freedom from discrimination, no matter how unusual or strange their position might appear to others.

(Council of Europe, 2018c, p. 104)

This is the opposite of marginalizing or stigmatizing cultural others. Instead, the case is made explicitly that it is *only* violent extremists and terrorists who need to be opposed so that their actions can be prevented:

Inflicting violence on other people is the most profoundly anti-democratic act and the ultimate violation of the dignity and rights of others. Violent extremism must be opposed and prevented in any democratic society.

(Council of Europe, 2018c, p. 104)

However, even in the case of violent extremists and terrorists, the restrictions that are used to oppose and prevent violence must:

be those that are prescribed by law, are necessary to protect other people within a democratic society, and are proportionate to that need.

(Council of Europe, 2018c, p. 104)

That said, the RFCDC does indeed specify “what is not permissible and what is not” (Simpson & Dervin, 2019a, p. 111) within a culturally diverse democratic society: the violation of the dignity and human rights of other people through the use of violence is not permissible. This is a logical consequence of adopting a human rights perspective.

However, it should be noted that the RFCDC does not argue that, in opposing and placing restrictions on the actions of violent extremists and terrorists, there should be any attempts at restricting extremists' and terrorists' rights to freedom of thought, conscience and religion. Instead, the RFCDC explicitly states that:

From a human rights perspective, another person's *right to freedom of beliefs should always be respected*, but respect cannot be accorded to *the contents of beliefs* that seek to undermine or violate the dignity, human rights and fundamental freedoms of others. In the case of beliefs where the content cannot be respected, restrictions are placed *not on the right to hold the beliefs* but on *the freedom to manifest those beliefs* if such restrictions are necessary for public safety, the protection of public order or the protection of the rights and freedoms of others (see Article 9 of the European Convention on Human Rights: www.echr.coe.int/Documents/Convention_ENG.pdf).

(Council of Europe, 2018a, footnote 8, p. 42, our emphases added)

Apart from this restriction on the freedom to manifest beliefs that seek to undermine or violate the dignity, human rights and fundamental freedoms of other people, the RFCDC specifically states that *everybody without exception* is entitled to freedom of thought, conscience and religion, freedom of expression and freedom from discrimination. We would argue that this is not, as Simpson and Dervin assert: (i) marginalising and stigmatising the other, (ii) othering the Other, or (iii) sanitising the political. We reject all three of these claims.

In addition, it is important to point out in this context (given the content of Simpson and Dervin's statement quoted at the start of this section) that the RFCDC does not state in any of its three volumes that Europe is free from falsehoods, propaganda and distortions of truth. The claim that the RFCDC hierarchically positions Europe in this way is an invention by Simpson and Dervin.

In short, in claiming that the RFCDC stigmatises and marginalises the other, Simpson and Dervin ignore the fact that the RFCDC is explicitly grounded in a human rights perspective, a perspective that is resolutely and tenaciously protective of the dignity and human rights of *all* human beings, irrespective of whether they are European or other. Indeed, it is precisely because of its foundation in universal human rights that the RFCDC censures the actions of violent extremists and terrorists so firmly.

Error 11 (interpretative): The claim that the approach to identity used by the RFCDC places the responsibility on the individual citizen and fails to provide individuals with critical tools to examine decision makers' roles and responsibilities

We also wish to comment on two related interpretative errors which are contained in Simpson and Dervin's statement that the approach to identity used by the RFCDC:

is based almost exclusively on the responsibility of the individual, without providing them with critical tools to look into decision makers' role and responsibility.

(Simpson & Dervin, 2019a, p.110)

We are perplexed by this statement for two reasons. First the RFCDC argues explicitly that participation in democratic processes and intercultural dialogue is not solely a responsibility of the individual. It instead argues that appropriate institutional structures, and actions on structural inequalities and disadvantages, are essential:

in addition to democratically and interculturally competent citizens, a democracy needs democratic political and legal institutions. Such institutions must make available to citizens opportunities for active engagement. Institutions which deny such opportunities are not democratic. For example, citizens' opportunities for democratic activities and participation are denied if there are no institutional consultative bodies through which citizens can communicate their views to politicians. Where this occurs, citizens need to use alternative forms of democratic action if they wish to make their voices heard. Similarly, if there are no institutional structures to support intercultural dialogue, then citizens are less likely to engage in such dialogue. However, if governments provide appropriate places and spaces (for example cultural and social centres, youth clubs, education centres, other leisure facilities or virtual spaces) and promote the use of these facilities for intercultural activities, then citizens are more likely to engage in intercultural dialogue. [...]

Furthermore, where there are systematic patterns of disadvantage and discrimination, and where there are differences in the allocation of resources within societies, people may be disempowered from participation on an equal basis. For example, if citizens do not have sufficient material or financial resources to access information about societal or political issues or to participate in civic actions, they will be disempowered in comparison with people who do have such resources. In this case, their competences for participation are irrelevant because there is no opportunity to use them. [...] For these reasons, special measures need to be adopted to ensure that members of disadvantaged groups enjoy genuine equality of opportunity to engage in democratic action. It is not sufficient only to equip citizens with the competences that are specified by the Framework. It is also necessary to change structural inequalities and disadvantages.

(Council of Europe, 2018a, pp. 27-28)

The second reason why we are perplexed by Simpson and Dervin's statement is because the RFCDC unambiguously specifies numerous competences which provide learners with precisely the critical tools that are needed to examine, question and challenge decision makers' roles and responsibilities.

For example, the RFCDC recommends that a wide range of critical thinking skills should be fostered through education. These include: making evaluations on the basis of internal consistency and consistency with available evidence; making judgments about whether or not materials under analysis are valid, accurate, acceptable, reliable, appropriate, useful and/or persuasive; engaging not only with the literal meaning of materials, but also with their broader rhetorical purpose including the underlying motives, intentions and agendas of those who produced or created them; generating and elaborating different alternative options, possibilities and solutions to those that are present within the materials under consideration; weighing up the pros and cons of the available options, which can include cost-benefit analysis, resource analysis and risk analysis; drawing the results of the evaluative process together in an organised and coherent manner; and recognising one's own assumptions and preconceptions that might have biased the evaluative process, and acknowledging that one's judgments are always contingent and dependent upon one's own cultural affiliations and perspective (see Council of Europe, 2018a, p. 47).

In addition, the RFCDC recommends that numerous aspects of knowledge and critical understanding of politics and law should be fostered through education. These include: knowledge and understanding of political and legal concepts; knowledge and understanding of democratic processes; knowledge and understanding of the diverse ways in which citizens can participate in public deliberations and decision

making and can influence policy and society; understanding power relations, political disagreement and conflict of opinion in democratic societies, and of how such disagreements and conflicts can be peacefully resolved; knowledge and understanding of current affairs, contemporary social and political problems, and the political views of others; and knowledge and understanding of contemporary threats to democracy (see Council of Europe, 2018a, p. 54).

It is self-evident that, equipped through education with all of these critical thinking skills and with all of this knowledge and critical understanding, learners will have the critical tools that are necessary to examine, question and challenge decision makers' roles and responsibilities. Education based on the RFCDC fosters critical and empowered citizens, not "obedient" citizens as claimed by Simpson and Dervin (2019a, p.111).

In short, Simpson and Dervin commit two further interpretative errors by asserting that: (i) the RFCDC places responsibility "almost exclusively" on the individual, and (ii) the RFCDC fails to provide individuals with the critical tools that are needed to challenge decision makers' "role and responsibility" (sic). There is no evidence from the text of the RFCDC to support either of these two assertions.

Error 12 (interpretative): The claim that the RFCDC disguises Eurocentrism under "intercultural correctness" and attempts to mask its internal contradictions by focussing on intercultural openness

The final, interpretative, error that, bearing in mind the constraints of length of this text, we wish to comment on here is contained in Simpson and Dervin's statement that, in the RFCDC:

Eurocentrism is disguised under "intercultural correctness," in part, through appearing to focus on values such as respect and stressing a need for an intercultural dialogue [...].
(Simpson & Dervin, 2019a, p.114)

A subversive rhetorical function is performed through the use of the words "disguised" and "appearing" in this statement, as Simpson and Dervin imply that the focus on respect (which, incidentally, is an attitude, not a value) and the emphasis on intercultural dialogue in the RFCDC are not genuine. Elsewhere, they argue that the RFCDC may be using intercultural openness as a "potential masquerade" to "hide" its internal contradictions:

"openness to cultural otherness and to other beliefs, world views and practices" could be used as a potential masquerade to hide the contradictory agendas found in the other examples.
(Simpson & Dervin, 2019a, p. 111)

Given that the supposed "contradictory agendas" identified by Simpson and Dervin only arise as a consequence of the category errors which they themselves commit, there is no need for any disguises, appearances, masquerades or hiding by the RFCDC.

Contrary to Simpson and Dervin's suggestion that respect, openness and intercultural dialogue are masquerades that are used to conceal the flaws and biases of the RFCDC, respect, openness and intercultural dialogue are vital for developing a coherent programme of education for democratic citizenship, based on universal human rights, for use in culturally diverse societies. Respect is, moreover, a core attitude, because it provides the link between the valuing of human dignity and human rights, the valuing of cultural diversity and intercultural dialogue. As the RFCDC notes:

Respect is an attitude towards someone or something (for example a person, a belief, a symbol, a principle, a practice) where the object of that attitude is judged to have some kind of importance, worth or value which warrants positive regard and esteem. [...]

One type of respect that is especially important in the context of a culture of democracy is the respect that is accorded to other people who are perceived to have different cultural affiliations or different beliefs, opinions or practices from one's own. Such respect assumes the intrinsic dignity and equality of all human beings and their inalienable human right to choose their own affiliations, beliefs, opinions or practices. Importantly, this type of respect does not require minimising or ignoring the actual differences that might exist between the self and the other, which can sometimes be significant and profound, nor does it require agreement with, adoption of or conversion to that which is respected. It is instead an attitude that involves the positive appreciation of the dignity and the right of the other person to hold those affiliations, beliefs, opinions or practices, while nevertheless recognising and acknowledging the differences which exist between the self and the other. An attitude of respect is required to facilitate both democratic interaction and intercultural dialogue with other people.

(Council of Europe, 2018a, p.42)

Likewise, the RFCDC regards "openness to cultural otherness and to other beliefs, world views and practices" as essential for intercultural dialogue. Openness is defined as an attitude towards either people who are perceived to have different cultural affiliations from oneself or towards world views, beliefs, values, and practices that differ from one's own. It is described as involving: sensitivity towards cultural diversity; curiosity about other cultural orientations and affiliations and other world views, beliefs, values, and practices; willingness to suspend judgment and disbelief of other people's world views, beliefs, values, and practices, and willingness to question the "naturalness" of one's own world view, beliefs, values, and practices; emotional readiness to relate to others who are perceived to be different from oneself; and willingness to seek out or take up opportunities to engage, co-operate, and interact with those who are perceived to have cultural affiliations that differ from one's own, in a relationship of equality (see Council of Europe, 2018a, pp. 41-42).

Thus, the RFCDC argues that respect and openness are two fundamental attitudes that are essential for intercultural dialogue. The focus on respect, openness and intercultural dialogue in the RFCDC is due precisely to the judgement that all three are vital for building a culture of democracy in culturally diverse societies. This focus on these three issues has nothing to do with trying to disguise, mask or hide biases or flaws in the RFCDC.

Another issue raised by the quotation from Simpson and Dervin at the beginning of this section is their charge of Eurocentrism in the RFCDC. As we have explained above, the RFCDC is based on the perspective of universal human rights. While it is sometimes claimed that universal human rights as conceived in the Universal Declaration of Human Rights (UDHR) is a Western construction and that the human rights value system differs from other value systems that are used elsewhere in the world, these claims ignore not only the involvement of non-Western scholars in the drafting of the UDHR but also the involvement of non-Western countries in its adoption (Glendon, 1998). Such claims further ignore the sheer multiplicity and diversity of values within and across all societies, including European societies (Sen, 1999). Not that Simpson and Dervin themselves advance the argument that human rights are a Western or European construction that the RFCDC is attempting to impose on the rest of the world. In fact, the only clear argument advanced by Simpson and Dervin for the claim that the RFCDC is Eurocentric is that it was "produced by European scholars" (Simpson & Dervin, 2019a, p. 114). This is an *ad hominem* fallacy: criticising the characteristics of the authors instead of addressing

the substance of their arguments.

Simpson and Dervin go on to claim that the RFCDC represents the *imposition* of a Eurocentric perspective which:

dictates “softly” what is deemed as permissible and not permissible with regards to democracy, culture, and identity.

Simpson and Dervin (2019a, p. 114)

In support of this claim, they cite a statement from the RFCDC which explicitly says that the model of competences (Figure 2) is not an imposition as evidence of imposition, an argument which escapes our logic:

“The model is not an imposition” could be an imposition in itself.

Simpson and Dervin (2019a, p. 114)

They also ignore numerous other statements that appear throughout the RFCDC that all decisions concerning the adaptation and implementation of the RFCDC need to be made by local education policy makers and practitioners, not by the CoE or anyone else. Indeed, the full quotation from the RFCDC concerning the issue of imposition (from which Simpson and Dervin quote selectively) actually reads as follows:

The model is not an imposition of an ideal but a conceptual organisation of the competences to which reference can be made by users of the Framework. Users will decide how to adapt and implement the Framework in their own contexts for their own purposes. The Framework, in the third volume of guidance chapters, describes possibilities and options in its use, and users of the Framework will need to make their own decisions about which options are appropriate in their own context.

(Council of Europe, 2018a, p. 12)

Elsewhere, it is stated that:

the use of the Framework, and the strategy for its implementation in education, will always need to be adapted to the specific local, national and cultural contexts in which it is used [...] Adaptation is necessarily the responsibility of policy makers and practitioners who have the detailed knowledge and understanding of specific contexts [...] Decision making based on the Framework must always take place as near as possible to the level of implementation, such as the national, regional, municipal or education institution, teacher or learner [...]

(Council of Europe, 2018a, p. 20)

Simpson and Dervin’s argument seems to be based on their own misunderstanding of how the CEFR is now being used in many parts of the world, which they similarly claim is an imposition:

considering the symbolic power of the institution [i.e., the CoE] in Europe and elsewhere, for instance in relation to the Common European Framework for Languages, which *volens nolens* has become an imposition in many parts of the world, one could easily predict a spread of the [RFCDC] documents under review in the future.

Simpson and Dervin (2019a, p. 114)

However, they cite no evidence to support their claim that the CEFR “has become an imposition in many parts of the world,” and they fail to make the phrase “many parts of the world” more specific. The use of “*nolens volens*” in this statement only deepens the obscurity. The evidence collected in Byram and Parmenter (2012) demonstrates that the CEFR has in fact been adapted (e.g., in Colombia) and “re-written” (e.g., in Japan). In none of the seven countries outside Europe discussed and carefully analysed by two authors in the case of each country was the CEFR “imposed” or, willingly or unwillingly, adopted without change.

In short, Simpson and Dervin’s statement that the RFCDC disguises Eurocentrism under “intercultural correctness” and attempts to mask its internal contradictions by focussing on intercultural openness is not well founded. In addition, the supposed Eurocentrism of the RFCDC is not demonstrated but merely asserted. There are no internal contradictions in the RFCDC, and respect, openness and intercultural dialogue are three core pillars of the RFCDC, not disguises or masquerades. Finally, Simpson and Dervin fail to provide any coherent argument or evidence that the RFCDC (or indeed, the CEFR) is an “imposition” of a Eurocentric perspective.

Conclusion

We have analysed 12 errors committed by Simpson and Dervin (2019a) in their description of the RFCDC. Some of these errors are factual and can therefore be corrected relatively easily by referring to more reliable sources of information (including the RFCDC itself). Other errors made by these authors are interpretative. These errors require reference to the text of the RFCDC in order to ascertain what this text actually says, rather than relying on any of the glosses, commentaries or interpretations provided by Simpson and Dervin. The third group of errors are category errors, in which Simpson and Dervin compare phrases, sentences or longer stretches of text taken directly from the RFCDC without paying any attention to the logical category from which these extracts have been drawn. By comparing examples drawn from different logical categories, and assuming that all of the examples are making theoretical statements, Simpson and Dervin draw fallacious conclusions about the RFCDC, especially their imputation of internal contradictions.

It is important to be aware that these 12 errors are not the only ones in the paper. We could have discussed many more, but doing so would have become repetitive and would have required this paper to be significantly longer. The 12 errors on which we have focused our attention are the most significant and most urgently in need of correction, to avoid misrepresentations of the RFCDC being adopted and promulgated in the research literature.

We end this paper simply by advising any reader who wishes to construct an accurate understanding of the RFCDC to read the original texts, and to make their own interpretations of those texts. We are confident that readers who undertake this activity will achieve a more accurate understanding of the relevant issues than they will by relying on Simpson and Dervin’s paper. Reading the RFCDC will also ensure that readers are able to draw their own informed conclusions about both the RFCDC and the critique offered by Simpson and Dervin.

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ⁱⁱ Although not a member of the CoE, Belarus is a signatory of the European Cultural Convention, and it can therefore participate in the Education activities of the CoE.