

LGBT-Inclusive Education in Liberal Pluralist Societies

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ABSTRACT *What should be the aim of LGBT-inclusive, state-mandated curricula in liberal, pluralist societies? In this article, I identify two distinct aims that such curricula might have. The first, LGBT Respect, aims to teach that LGBT individuals have equal political status and rights. The second, LGBT Approval, aims to teach a positive attitude towards LGBT relationships, including that there is nothing wrongful about these forms of relationship. I examine what arguments in favour of these different aims are available to the liberal concerned with accommodating pluralism. To capture this concern, I adopt political liberalism's strict standard for legitimate political interventions that these must have justifications that all reasonable citizens can accept. This initially seems to recommend curricula that aim at LGBT Respect but stop short of LGBT Approval. Can the political liberal go any further? I propose and critically discuss the most promising arguments in favour of LGBT Approval, including the need to prevent harm to children, ensure political equality, and secure the social conditions needed for the development of the primary good of self-respect. I tentatively conclude that there exists a cumulative case for state-mandated curricula aiming at LGBT Approval, at least in the contingent, nonideal circumstances that currently obtain.*

1. Introduction

And Tango Makes Three tells the true story of two male penguins at a New York zoo who raise a chick together. *Julian is a Mermaid* is about a little boy who wears lipstick and jewellery as he dresses up as a mermaid. These books were read to children at primary schools in Birmingham, England, focusing on 4–6 year olds, as part of the 'No Outsiders' programme, which introduces children to the characteristics protected by the Equality Act 2010, including sexual orientation and disability. The programme led to protests during 2019 outside several schools, led predominantly, but not exclusively, by Muslims. As Fatima Shah, a mother who was instrumental in initiating the protests, complained, 'Children are being told it's OK to be gay, yet 98% of children at this school are Muslim'.¹

Subsequent changes to England's core curriculum mean that controversies over LGBT content have continued. Since September 2020, a new relationships education curriculum that includes LGBT content has become compulsory for all schools. Whilst parents can choose to withdraw their child from sex education, they cannot withdraw their child from relationships education. Guidance to schools on how to approach LGBT content within the new curriculum has been sparse and sometimes contradictory. The Department for Education's 'FAQs' say that LGBT relationships should be presented as 'loving, healthy' relationships.² But this is not explicit in the curriculum itself, which merely requires that children learn that there are different types of loving families and stable, caring relationships, and that these differences ought to be respected.³ The issue is

further confused by the Department for Education's insistence that 'schools with a religious character can build on the core required content by reflecting their beliefs in their teaching'.⁴ The view that LGBT relationships are 'healthy' conflicts with the teaching of some conservative strands of major religious traditions that these relationships are sinful.⁵

Similar dilemmas confront teachers, schools, and governments in other modern liberal democracies as the need for LGBT-inclusive curricula is increasingly recognised. For example, seven US states now require LGBT content as part of the curriculum, yet there is limited guidance as to content and approach.⁶ There is an open question as to what the aims of LGBT-inclusive curricula ought to be in liberal, pluralist societies, a question that needs answering if teachers are to identify appropriate content.

There are at least two possible aims that one might have in mind for an LGBT-inclusive curriculum.⁷ First, one might aim to teach children that LGBT individuals have equal moral and political status and rights, whilst remaining neutral on the moral status of LGBT relationships. Call this the aim of LGBT Respect. Second, one might aim to cultivate in children a positive attitude towards LGBT relationships, including aiming for students to reject the belief that a relationship being LGBT makes it morally wrongful. Call this the aim of LGBT Approval. Whereas LGBT Respect focuses on teaching children that they ought to respect someone even if they disapprove of their beliefs and actions, LGBT Approval teaches children that they ought not to hold attitudes of LGBT disapproval in the first place.

In order to understand the important difference between LGBT Respect and LGBT Approval, it is helpful to disambiguate two senses of 'morally equal'.

Morally Equal [1]: Entitled to equal (recognition) respect, with the implication that claims and interests matter equally.

Morally Equal [2]: As morally good as each other; living equally choice-worthy lives. Entitled to equal (appraisal) respect in relation to moral attributes.⁸

Someone might plausibly believe that everyone is Morally Equal [1], but that murderers and nonmurderers are not Morally Equal [2]. An evangelical Christian might regard a sexually active homosexual as not Morally Equal [2], because they are living a life that openly embraces sin, whilst at the same time affirming their dignity and Moral Equality [1] as a child of God. Returning to the distinction between different aims of LGBT-inclusive education, LGBT Respect aims to teach children that LGBT individuals are Morally Equal [1] but does not take a stand on whether they are Morally Equal [2]. In contrast, LGBT Approval takes a stand on both types of moral equality. It takes a stand on Moral Equality [2] by aiming to teach that the fact that someone is LGBT should not affect our evaluation of the goodness or choice-worthiness of their life.

In this article, I discuss the dilemma that liberals face over which of these two aims ought to be endorsed in state-mandated school curricula in nonideal societies. In particular, what view should be taken by the liberal concerned with accommodating the diversity of conceptions of the good present in pluralist societies? To capture this concern, I adopt political liberalism's strict standard for legitimate political interventions that these must have 'public' justifications that all reasonable people can accept. If the state refrains from taking a stance on matters of reasonable disagreement about the good life, what arguments can be given for LGBT-inclusive education, and what curriculum aims do these arguments suggest? In Section 2, I show how the mainstream political liberal position

recommends LGBT-inclusive curricula that aim at LGBT Respect but stop short of LGBT Approval. Political liberalism requires that children are taught that LGBT individuals are Morally Equal [1] and thus entitled to equal respect and rights, but schools must remain neutral on whether LGBT individuals are Morally Equal [2] in the sense of living equally choice-worthy lives to those who are not LGBT.

Can the political liberal go any further? In Section 3, I propose and critically discuss the most promising arguments in favour of LGBT Approval that avoid appeal to the truth of premises that are the subject of reasonable disagreement. In particular, these arguments avoid appeal to the view that LGBT relationships are morally acceptable, since a policy intervention justified by that view would be paradigmatically nonneutral. (John Rawls uses same-sex relations as an example of an issue that falls outside the state's legitimate interest in family life.⁹ This is because some people accept what I will refer to as 'LGBT-Wrongfulness': the view that LGBT behaviours are morally wrongful forms of sexual deviance. Some who hold this view are not religious; perhaps their view is rooted in beliefs about what is 'natural', or perhaps it stems from others in their community. For others, the view is rooted in religious traditions that hold LGBT relationships to be sinful. At least according to Rawls, 'all the main historical religions ... may be seen as reasonable comprehensive doctrines'.¹⁰) The arguments of Section 3 are therefore intended to be acceptable to the liberal concerned with accommodating pluralism. I tentatively conclude that taken together, these reasons give a cumulative case for state-mandated curricula aiming at LGBT Approval. Although my focus in this article is specifically on the aims of LGBT-inclusive state curricula, I note that some of the arguments might also apply to other groups that fall outside the 'relationship and orientation mainstream' (such as asexuals), suggesting that a more inclusive approach to relationships education might be required than that which is currently taken in schools.

In Section 4, I discuss two objections to the case for LGBT Approval. My responses highlight in what ways the case for LGBT Approval is conditional upon a particular view of parental rights and upon our current, nonideal circumstances.

The arguments of Section 3 suggest that teachers ought to engage in directive teaching of the view that there is nothing wrongful about LGBT relationships. (Directive teaching is teaching aimed at students coming to hold [or reject] certain beliefs or attitudes.) It is important to note, however, that establishing a particular aim does not imply a particular teaching method.¹¹ In Section 5, I suggest that a light-touch approach, with a strong emphasis on discussion, will often be the right method for teaching LGBT Approval, and I show how this differs from teaching aiming only at LGBT Respect.

The approach in this article differs from that taken by the philosopher of education Michael Hand in his discussions of homosexuality in schools. Hand adopts an 'epistemic criterion' where topics are to be taught as controversial when contrary views can be held on them without those views being contrary to reason. He argues that according to that criterion, the moral status of homosexuality ought to be taught as settled rather than controversial because there are no rationally defensible moral objections to homosexuality.¹² Hand rejects what he calls the 'political criterion', which says that 'a moral question should be taught as controversial when no answer to it is entailed by the public values of the liberal democratic state'.¹³ In contrast, the approach here is to ask whether, if we adopt the 'political criterion', we can get to the same conclusion as Hand regarding LGBT teaching in schools. If we can, this has the advantage of meeting the high standards for legitimacy set by political liberals. But this approach has practical as well

as theoretical advantages, for seeking justifications that will appeal to those resistant to an LGBT-inclusive curriculum is a more peace-keeping strategy than simply dismissing their viewpoints as unreasonable.

2. Teaching LGBT Respect

Political liberals are committed to the view that legitimate political interventions have justifications that all reasonable citizens can accept. Applying this to school curricula, Matthew Clayton and David Stevens argue that

Any subject that has compulsory status for all pupils in state-run schools funded by taxpayers must meet this justificatory burden. That is, there must be sufficiently weighty, non-partisan, reasons that are acceptable to all reasonable citizens ...¹⁴

Reasonable citizens view each other as free and equal partners in social cooperation, and so children's education must develop the capacities required for this status. This includes the capacity to form and revise one's conception of the good. Many political liberals have argued that this implies that children need introducing to a diversity of views.¹⁵ Applying this to LGBT education, we might argue that students should be introduced both to the fact that LGBT relationships exist and that some reasonable citizens view these as healthy relationships.

Political liberalism also implies that schools should be teaching that everyone is entitled to recognition respect: a reciprocal positive regard owed to all persons in virtue of their status as free and equal citizens, regardless of characteristics such as sex, race, and sexual orientation. This respect extends to individuals who you believe have made poor life choices and are mistaken in their beliefs about religious or ethical matters. Respect implies tolerance of people whose actions you disapprove of.

Recognition respect implies that everyone is the rightful recipient of equal political and legal rights. But it also generates moral requirements to treat people in certain ways that go beyond this. For example, it requires not disparaging a person publicly because they have a social identity you find objectionable.¹⁶ Given the high prevalence of bullying and hostility experienced by LGBT individuals in schools, taking seriously recognition respect as an educational aim implies the need for more LGBT-inclusive curricula than is currently provided in most schools in most countries. It would justify steps to reduce hostility towards LGBT individuals in schools, for such hostile behaviour undermines the political liberal commitment to regarding all as equal members of the moral community. One important means of reducing hostility is increased visibility.¹⁷ This might be achieved via early reading programmes featuring books such as those found objectionable by parents in Birmingham.

Although the aim of LGBT Respect takes us a long way from the status quo, what is important for our purposes is noting where it asks us to stop. Schools can read books like *And Tango Makes Three*, teaching directly that same-sex families exist and that these individuals are entitled to respect and equal rights. But what schools may not say is that there is nothing wrong with these families. Whilst the issue of what rights gay people should have is unavoidably in the political sphere, the question of the morality of same-sex relationships is not. The political liberal commitment to neutrality implies that if the

moral status of LGBT relationships is discussed at all, teachers ought to treat the matter as controversial and teach nondirectively.

Someone might object that sex and relationships ought not to be discussed at all in the political liberal state school. Not only does sex education face conservative objections, but perhaps the state should not be promoting relationships of any kind, because the value of relationships is the subject of reasonable disagreement.¹⁸ It is true that sex and relationships education as it is currently taught does prioritise and valorise heterosexual, monogamous romantic relationships and the sex that often accompanies them. In doing so, it excludes those who do not experience sexual desire or a desire for romantic relationships. But this need not be so, and ought not to be so. Sex and relationships education should be taught without endorsing the amatonormative assumption that everyone is better off in an exclusive, romantic, long-term, sexual relationship and without implying that sexual desire is normative, i.e. that everyone ought to experience it.¹⁹ Since sex and relationships will be a feature of the lives of most people and are an important source of flourishing for many people, children need to be taught in schools how to navigate relationships (the importance of consent, how to recognise exploitative or abusive relationships, emotional literacy, how to avoid inflicting harm on a sexual partner, etc.) and about the diversity of relationships and orientations that exist.²⁰ This is especially important in our current nonideal circumstances – the circumstances I address in this article. Since heteronormativity and amatonormativity are so dominant, silence in schools on sex and relationships would negligently fail to address the hostility and lack of recognition respect faced by those that fall outside the ‘relationship and orientation mainstream’.

To return to our question of LGBT education: the mainstream political liberal view points towards schools teaching Moral Equality [1], including exposing children to the fact that LGBT individuals exist and that some people hold that there is nothing wrongful about these forms of relationship. However, schools should refrain from taking a viewpoint on matters relating to Moral Equality [2] that are controversial amongst reasonable citizens, including on the issue of whether LGBT relationships are wrongful. According to this mainstream view, schools should teach LGBT Respect, not LGBT Approval.

3. Teaching LGBT Approval

Curricula aiming at LGBT Approval will only be legitimate from the perspective of political liberalism if they have justifications that reasonable people – including those who hold that LGBT relationships are wrongful – can accept. In this section, I discuss three of the most promising justifications that might meet this requirement. Together, they make a case for schools departing from silence on the value of relationships in this case, in order to push against the damaging LGBT-Wrongfulness view.

3.1. Harm

Political liberals have typically refrained from talk of wellbeing, because what wellbeing amounts to is the subject of reasonable disagreement. This has led to a focus on education for purely civic purposes. Rawls, for example, is explicit that ‘Society’s concern with [children’s] education lies in their role as future citizens ...’.²¹ But there is good reason to think that this restricted focus for education is a mistake. It is consistent with political

liberalism to postulate a 'thin' theory of wellbeing, one that is agreed upon across a wide range of conceptions of the good. Rawls suggests we can move from the political conception of the person as free and equal to 'find a shared idea of citizens' good appropriate for political purposes'.²² This gives us the concept of 'primary goods' – all-purpose means of pursuing whatever conception of the good a person has – and we might conceive of wellbeing in terms of access to these primary goods.

The just society 'ensures ... a fair share' of primary goods.²³ Alongside the fact that the state has especially stringent obligations towards children, this gives a strong case for state interference with children's upbringing when their wellbeing (thinly conceived) is being damaged.²⁴ The political liberal can, and ought to, take some stand on what makes a child's life go well, and that stand should influence state education. So, how might a belief that LGBT behaviours are wrongful prevent a child's life from going well?

First, beliefs about LGBT-Wrongfulness damage mental health. Research suggests that mental health is often very poor amongst LGBT youth, with high levels of self-harm and attempted suicide.²⁵ Mental health is now widely recognised as part of overall health, which Rawls explicitly identified as a primary good.²⁶ So, we might consider the social bases for mental health as a primary good.

One study found that 45% of LGBT students are bullied at school as a result of being LGBT, and it seems plausible that bullying is one cause of poor mental health.²⁷ If schools were successful in teaching LGBT Respect, making schools more welcoming places for LGBT youth, mental health outcomes would likely improve.²⁸ But there are at least two reasons to think that concern with mental health requires the aim of LGBT Approval instead. First, children who identify as LGBT or who have LGBT parents are harmed by their disapproving peers, whose tolerance need only extend to how they are treated in the public sphere. It does not extend to people's personal decisions about, for example, who to invite to a party. Yet social exclusion can be at least as upsetting as outright hostility. Whilst few would endorse state interference in the lives of adults to stop such social exclusion, it is unreasonable to expect children to develop 'thicker skins' and be resilient to social exclusion resulting from people holding negative beliefs about LGBT relationships. Second, as Tim Fowler has argued, the belief that LGBT relationships are wrongful is a case where 'children's interests ... are directly imperilled by the content of their own ethical beliefs'.²⁹ Research suggests that internalised homophobia has a significant negative impact on mental health.³⁰ This is unsurprising; believing that your sexual inclinations are wrongful, and perhaps also that eternal punishment awaits you because of these inclinations, seems obviously damaging to mental health. Teaching aimed at LGBT Approval targets these harmful beliefs in a way that teaching aimed at LGBT Respect does not.

The argument so far has been that the LGBT-Wrongfulness view is associated with poor mental health during childhood. But concern with children's wellbeing ought to extend to protecting their future good and so should also include protection from harms that will not emerge until adulthood. For example, it harms a child to be given a painless hysterectomy, even where this has no effects until adulthood. The option of having children is agreed to be good across a wide range of conceptions of the good, and thus state intervention to secure this option for the future adult ought to be regarded as legitimate from a political liberal perspective. Having the option of romantic relationships is also agreed to be an important life-good across a wide range of conceptions of the good.³¹ Lifelong (or at least long-term) partnerships, an important subset of which are romantic

relationships, are one way of mitigating against loneliness. Loneliness is associated with low levels of subjective wellbeing as well as numerous adverse health outcomes.³² We might even regard fair opportunities to form and maintain meaningful close relationships as a fundamental concern of liberal-egalitarian justice.³³ If that is right, then educational institutions should adopt policies that promote views that facilitate a fair distribution of opportunities to such relationships. The belief that LGBT behaviours are wrongful poses a major obstacle for LGBT individuals to the future fulfilment of the life-good of long-term partnerships. It leads to some people refraining from romantic relationships, with great costs for their wellbeing.³⁴ Indeed, research amongst celibate, gay Christians suggests high levels of distressing loneliness.³⁵ Other LGBT individuals have heterosexual relationships that are unfulfilling for both parties.

It is also agreed upon from a diverse range of perspectives that having opportunities for sexual satisfaction is an important life-good for many. Martha Nussbaum includes sexual satisfaction in her capability theory, which is meant to provide a minimalist account of wellbeing, consistent with political liberalism.³⁶ A state-mandated curriculum that aims at LGBT Approval, offering directive teaching against the view that LGBT relationships are wrongful, may be justified as one way of facilitating fair access for LGBT individuals to the life-goods of romantic relationships and sexual satisfaction.

Even when the belief that LGBT relationships are wrongful does not prevent people from engaging in romantic relationships and sexual experiences, shame and guilt stemming from this belief may damage the quality of these experiences and/or lead to poor mental health outcomes.³⁷ Reflection on this fact helps explain why it is an insufficient response to the harms arising from belief transmission to simply teach ‘for autonomy’, as has often been recommended.³⁸ Ensuring that children develop critical thinking skills so that they possess the tools to reflect on, and potentially reject, the beliefs that they have been brought up with does not eliminate the possibility of harm. There are numerous anecdotal reports of people engaging in remarkable acts of autonomy by turning away from their religious upbringings, yet at the same time being unable to shake the effect of certain beliefs that on a rational level, they reject. For example, I personally know self-proclaimed ‘ex-Jews’ who have left all aspects of their Judaism behind and yet find themselves unable to eat pork because they cannot help but regard it as ‘disgusting’. Feelings of disgust that prevent you from eating pork are a minor obstacle to wellbeing, but the same cannot be said when these feelings relate to sex and relationships. Megan Phelps-Roper, for example, brought up in the Westboro Baptist Church, talks of donning ‘guilt, shame and fear’, which she ‘wore ... like an impenetrable cloak that could never be shed’ and which kept her away from physical contact with men.³⁹ The Internet is full of similar stories, particularly of ex-Catholics who report being unable to shake their ‘Catholic guilt’ and who diagnose themselves as ‘sexually repressed’.⁴⁰

We might even frame the harm done in such cases as damage to autonomy. In his discussion of appearance norms, Andrew Mason has argued that even

when a person rejects ... a social norm ... but she nevertheless experiences feelings of shame and guilt when she doesn’t comply with it, and she cannot get rid of these feelings or can do so only with great difficulty, then these costs should count in determining whether her autonomy is impaired.⁴¹

We might say the same in relation to beliefs. We can exercise our autonomy by standing back and critically evaluating a belief, ultimately rejecting it. But if we continue to

experience shame and guilt attached to certain behaviours that stem from the original belief, our autonomy is, in another sense, damaged. Autonomy is damaged because (for example) the option of a romantic relationship remains unavailable to us or comes with high costs that are not attached to relationships for other groups in society. Our options are restricted by values we do not endorse. Since autonomy is a fundamental ideal animating political liberalism, this is the sort of reason that political liberals ought to care about.⁴² So, if the LGBT-Wrongfulness view damages autonomy, this might justify actions aimed at countering the LGBT-Wrongfulness view, i.e. teaching aimed at LGBT Approval.

The argument from harm is strengthened by reflecting on what types of harms the state ought to interfere with. Clare Chambers has convincingly argued that the state should be concerned with harms where they are unequally dispersed and where these harms result from social norms.⁴³ The norms and beliefs surrounding LGBT-Wrongfulness fit these criteria: the harms discussed in this section are concentrated amongst a particular, oppressed group, and a key source of these harms are norms and beliefs surrounding LGBT-Wrongfulness.

In this section, I have discussed some of the harms that might be reduced by teaching aimed at LGBT Approval. The LGBT-Wrongfulness view leads to a loss of goods that are widely regarded as central to making one's life go well, including adequate mental health and the option of romantic relationships. It may also damage autonomy, by restricting the options that are realistically open. These harms are precisely the sort of harms that all reasonable people ought to be concerned about: they are regarded as harms across many different conceptions of the good, these harms affect different groups unequally, and the harms often result directly from internalising a belief. The state's legitimate concern with children's current and future wellbeing therefore supports the aim of LGBT Approval.

3.2. *Inequality*

Political liberals sometimes distinguish between 'political' and 'substantive' equality. All reasonable people accept political equality, which includes acceptance that everyone is Morally Equal [1], is entitled to the same moral, political, and legal rights, and has equal standing in the political sphere. Substantive equality goes beyond political equality, overreaching what is held in common by all reasonable people. An example of a substantive equality belief is that 'women and men are equally equipped for domestic duties'. An Orthodox Jew might reject that belief, believing instead that God has assigned women and men different (but equally valuable) roles, whilst at the same time believing that women and men are entitled to equal respect and rights (thus affirming political equality).

The mainstream political liberal position discussed in Section 2 implies that state-mandated school curricula should be limited to teaching political equality. Since political liberalism aspires to show that legitimacy is achievable even in a society where people reject broadly liberal ways of life, it seeks to accommodate those who deny substantive equality. So, schools cannot legitimately aim at students adopting substantive equality beliefs such as that women and men are equally equipped for domestic duties or that there is nothing wrongful about LGBT relationships.⁴⁴

However, as has been discussed in feminist literature, the distinction between political and substantive equality is hard to uphold in practice.⁴⁵ The effects of beliefs that conflict with substantive equality trickle into the political sphere, undermining political equality.

For example, these beliefs may lead to negative encounters in the supposedly nonpolitical sphere, which then act to undermine some people's abilities to participate as equals in the political sphere. Similar arguments can be made in relation to the LGBT case. Because of the centrality of sex and relationships to the lives of many people, negative appraisals of LGBT relationships may easily be generalised so as to lead to negative treatment of LGBT individuals more broadly. For example, a landlord's belief in the wrongfulness of LGBT relationships may (consciously or unconsciously) deter her from letting her flat to a same-sex couple. These 'everyday' acts of discrimination may accumulate to undermine the equal status of LGBT individuals. Cheshire Calhoun has argued that

equating being a homosexual with immorality produces a novel civic status: the citizen-deviant. Because all things gay or lesbian are routinely coupled, in legal and lay imaginations, with sodomy, child molestation, solicitation, promiscuity or some other category of immorality, nothing one does as a gay man or lesbian is untainted by the specter of immorality. Constructed as citizen-deviants, gay men and lesbians occupy a shadowy territory neither fully outside nor fully inside civil society.⁴⁶

If Calhoun is right, the LGBT-Wrongfulness view 'infects' political equality by lowering the civic status of LGBT individuals.

It is not plausible that regarding someone as morally inferior [2] always undermines the Moral Equality [1] required by political liberalism. But perhaps when the judgement of moral inferiority [2] arises from, and further exacerbates, harmful social hierarchies, Moral Equality [1] is undermined. In her discussion of wrongful discrimination, Deborah Hellman argues that negative treatment amounts to demeaning behaviour when it stems from unequal power relations and the victim's membership of a stigmatised group.⁴⁷ We might build on her thought as follows: because beliefs about LGBT-Wrongfulness at least partially stem from, and act to solidify, an already-stigmatised group's inferior social position, this undermines equality of standing and political equality.

These sorts of arguments have led some feminists to defend state intervention in matters of substantive equality explicitly from a political liberal perspective. Lori Watson and Christie Hartley, for example, argue that since reciprocity requires that all parties view each other as standing in equal relations of authority, social hierarchies can undermine conditions for reciprocity. Consequently it is within the remit of legitimate action by the political liberal state to enact laws and policies that work to change social norms that contribute to unacceptable forms of social hierarchy.⁴⁸ We might extend the political liberal feminist line of thought to argue that the state can legitimately aim for young people to develop beliefs that pull against unacceptable forms of social hierarchy. That is, schools may teach directly on some matters of substantive equality.

I am unsure of the extent to which this inequality argument is available to political liberals when it comes to justifying teaching LGBT Approval. The political liberal state can only get involved in matters of substantive equality when people's standing as equal citizens is being undermined. Do beliefs about the wrongfulness of LGBT relationships have this effect? In our current nonideal circumstances, they probably do. But this is against a background of widespread LGBT intolerance, and it is not clear that there is a necessary connection between believing that LGBT relationships are wrongful and rejecting LGBT individuals' standing as equal citizens. It should be possible for people to compartmentalise – to avoid generalising the supposed wrongfulness of LGBT

relationships to other domains. Perhaps in a world where there is much more LGBT Respect – where people are better at living out the dictum ‘love the sinner, hate the sin’ – people would not discriminate against LGBT individuals.

On the other hand, we know that implicit biases affect our decision-making, and it might be that the LGBT-Wrongfulness view leads to people making decisions that inadvertently negatively affect LGBT individuals. Minor acts of bias, if systematically encountered, build up to have significant effects. It seems clear that this damages equality of opportunity.⁴⁹ However, as Anca Gheaus points out, damage to equality of opportunity is not sufficient reason to diverge from neutrality on matters of reasonable disagreement. For Rawls and some other conceptions of justice, the freedom to pursue a reasonable conception of the good has priority over equality of opportunity.⁵⁰ But might the effects of implicit biases also act to undermine an individual’s ability to exercise their rights and liberties and to fully participate in the political sphere? If beliefs about LGBT-Wrongfulness are sufficiently widespread, they might have this effect. For example, implicit or unconscious mistrust or dislike could lead to negative evaluations of LGBT individuals, damaging their prospects of being elected, thus damaging their ability to exercise their right to hold public office. Widespread mistrust could also lead to their opinions being taken less seriously in political debates and decision-making, preventing LGBT individuals from enjoying the fair value of their political liberties.⁵¹

This damage to political equality could happen in a world where there are much higher levels of LGBT Respect than our current world. But it is not plausible that it could happen in a world where the LGBT-Wrongfulness view is a very minority view. In such a world, microaggressions resulting from implicit biases would not accrue to an extent that undermines LGBT individuals’ equal standing and ability to exercise their rights and liberties. The inequality argument for LGBT Approval is therefore contingent upon the LGBT-Wrongfulness view being sufficiently widespread, as it is in our world today.

3.3. *Self-Respect*

Rawls talks about self-respect as ‘perhaps the most important primary good’.⁵² As a primary good, it is within the remit of the legitimate state to ensure the social conditions required for its development. This implies not only that institutional structures be set up to ensure a just distribution of political rights, liberties, and access to resources but also that norms governing public interaction among citizens protect the social bases of self-respect.⁵³

If we understand self-respect as appraisal self-respect, as something like self-esteem (as Rawls sometimes explicitly indicates we ought to), then it is obvious how the LGBT-Wrongfulness view undermines the social bases of self-respect.⁵⁴ It is very hard for a homosexual person to view their life as a valuable project when surrounded by those who view homosexual relationships as wrongful. It is even harder if they themselves hold this belief. A person’s romantic and sexual relationships are often regarded as central to both identity and life goals, with the consequence that viewing one’s core actions in this domain as wrongful poses a major obstacle to self-respect.⁵⁵ Indeed, there is a wealth of evidence that supports a link between internalised homophobia, shame, and lack of self-esteem.⁵⁶

However, there are strong reasons to regard Rawls’ equivocation between self-respect and self-esteem as a mistake and to reject the idea that appraisal self-respect is a primary

good. The argument of the last paragraph could also be used to argue that (for example) schools should teach that all careers are equally valuable, since a person's occupation is also central to self-understanding and identity. Indeed, ensuring self-esteem would require far more than this, including perhaps curtailment of core liberties and strict egalitarianism.⁵⁷ It therefore makes sense to interpret self-respect more narrowly, as recognition self-respect. Elizabeth Brake suggests that this might be understood as recognising oneself as the sort of being 'whose striving is worthwhile', 'an agent possessing the moral powers and, accordingly, recognition that these powers give one entitlements as an equal citizen'.⁵⁸

There is reason to think that negative beliefs about LGBT relationships work to devalue LGBT individuals and their experiences in ways that undermine the conditions required for recognition self-respect. Robin Dillon has argued that damage to recognition respect of oneself, 'which can occur when people grow up in social, political, or cultural environments that devalue them or "their kind," can make it impossible for people to properly interpret themselves and their self-worth, because it affects the way in which they assess reality and weigh reasons'.⁵⁹ This might be interpreted as a form of "situated hermeneutical inequality" – the lived experience of being unfairly disadvantaged in rendering one's social experiences intelligible, to others and possibly even to oneself, and indeed Miranda Fricker has argued that gay people are in precisely this position in relation to making sense of their sexuality (Miranda Fricker).⁶⁰ These conditions make it hard to develop a self-identity that is the subject of self-respect.

Self-respect being damaged in this way is particularly worrying from a political liberal perspective, for reciprocity requires that both parties are able to advance claims to justice as equals. This requires not only that others regard you in a certain way but also that you regard yourself in a certain way – you must have adequate self-respect.⁶¹ Using the example of homosexuals as an illustration, Watson and Hartley argue that 'if a person is a member of an oppressed group, then his or her ability to form an identity as an equal citizen can be compromised'.⁶²

Arguing for protective measures by the state to prevent girls' self-respect from being undermined by them adopting conservative beliefs about gender, Brake has argued that believing yourself to be a 'sinful or unclean being' diminishes your sense of yourself as an equal. She also argues that being made to feel shame about your bodily desires could undermine self-worth.⁶³ These reasons point towards teaching aimed at LGBT Approval as a way of helping ensure the social bases of recognition self-respect.

Note that again, this argument pushes against the distinction between 'private' and 'political' domains. It rejects the view that people can be subject to negative judgements in the specific private domain of relationships and yet, despite this, enter the public political domain on an equal footing. I have already suggested that implicit biases might be one way in which that distinction is undermined. Additionally, Brake has argued that even if the private-public distinction holds, children are unable to make this distinction; a girl cannot be expected to adopt a dual sense of herself as unequal in the private domain but equal in the public domain, and thus she cannot be realistically expected to develop adequate self-respect when she is regarded as unequal in the private domain.⁶⁴ I am not convinced that children are significantly different from adults in this regard. Many adults feel attacks on their sexuality as attacks on their identity and equal standing and thus these attacks affect their self-respect. One reason for this might be that people tend to be defined by their sexual preferences (categorised as 'homosexual' or 'bisexual', for example).

This means that if you are (for example) homosexual and believe that there is something wrong with this sexual orientation, this may undermine your (recognition) self-respect. Whilst this most likely affects both adults and children, children's inherent malleability and vulnerability mean that the state has special obligations to put in place the conditions for their (recognition) self-respect.⁶⁵ Teaching aimed at LGBT Approval helps secure these conditions in a way that teaching aimed at LGBT Respect does not. Together with the need to protect children's wellbeing and secure their political equality, this gives a cumulative case for school curricula aiming at LGBT Approval.

The arguments here have been focused exclusively on the case for LGBT Approval. Whereas a liberal perfectionist like Fowler can jump straight to the conclusion that the just society would teach a general permissiveness about sexual choices (on the basis of this being regarded as true), that conclusion is not automatically available for the political liberal.⁶⁶ Many of the arguments of this section will apply to other relationship and orientation minorities. For example, asexual people are harmed by 'everyday erasure and denigration' in a way that makes it hard for them to make sense of their experiences and form an identity, damaging their self-respect.⁶⁷ Other arguments will not transfer over. For example, disapproval of polyamorous relationships need not lead to the harm of loneliness, since polyamorous individuals can still access the life-good of relationships (unless it is the case for some polyamorous people that they can only engage in more than one relationship at the same time). We would need to assess each case for Approval, looking in detail at the current nonideal circumstances and examining the weight of public reason arguments available.

4. Objections to Teaching LGBT Approval

4.1. *What about Parental Rights?*

'My child, my right' and 'say no to undermining parental rights and authority' read some of the signs held by protestors in Birmingham. These slogans assume a traditional view of parental rights, where parents have wide scope to shape their children's values in accordance with their comprehensive commitments. Since part of what it is to live (for example) a Christian way of life is to bring your child up with Christian beliefs and values, the right to shape children's values is often also seen to be an implication of a parent's right to freedom of religion.

If the traditional view is correct, then parental rights are an important competing consideration to those offered in the last section. What would the practical import of that be? No sensible view suggests that parental rights are absolute and that parents may dictate school curricula according to their beliefs, so if there is a strong case for LGBT Approval, then that might still outweigh the competing consideration of parental rights to suggest a place for LGBT Approval on the curriculum. However, the traditional view of parental rights might justify parents being able to exempt their child from aspects of relationships education that aim at LGBT Approval. This would be problematic given that the children of parents who hold the LGBT-Wrongfulness view are a key target.

I reject the traditional view of parental rights. I cannot fully justify my own view here, but some of the reasons that I reject the traditional view are as follows. First, proposed justifications for why parents possess such extensive rights (for example, justifications rooted in ownership claims) lack plausibility. Second, the view has potentially dangerous

consequences for children given their vulnerability.⁶⁸ And third, Gheaus has argued that recognising children's moral status as ends in themselves implies that we may not use them as a mere means to securing other people's interests.⁶⁹ Protecting the freedom of religion of an adult cannot happen at the expense of protecting children's interests.

My view of parental rights is that these are conditional on, and limited by, the (publicly identifiable) interests of children.⁷⁰ Assuming that view, if the arguments discussed in the last section are successful in showing that children's interests are damaged by the LGBT-Wrongfulness view, then parents have no right to teach their children the LGBT-Wrongfulness view. (This might have practical import for belief transmission in the home, but I restrict my interest in this article to schooling.) The arguments above suggest a school curriculum aimed at LGBT Approval, for this is a feasible action that can be taken by the state to counter the harmful LGBT-Wrongfulness view that many students are exposed to in their home lives. If my view of parental rights is correct, parents have no right to exempt their children from such curricula.

4.2. *What about Other Oppressed Minorities?*

Some may worry that if schools endorse a positive attitude towards LGBT relationships, this amounts to a public denial of the divine truth of Scripture, which is a cherished and deeply held belief for many religious people. Arguments like those discussed in Section 3 might then be used to argue for the opposite conclusion: we should not teach LGBT Approval because doing so harms the interests, equal standing, and self-respect of (for example) conservative Muslims, who (at least in the United Kingdom) are also an oppressed minority. Since directive teaching regarding the moral status of LGBT relationships will undermine someone's self-respect, social status, etc., surely it is better to refrain from saying anything on this controversial matter beyond that which is required to teach LGBT Respect?

The force of this objection is somewhat reduced by remembering that the state is restricting its nonneutrality on this issue to the school curriculum, with the aim of protecting children's interests. The state is making no attempt to dissuade adults from holding the LGBT-Wrongfulness view. The objection is more problematic with regard to children who have already internalised beliefs about LGBT-Wrongfulness – for example, teenage Muslims who hold conservative religious beliefs. For these students, teacher endorsement of views that conflict with their own may contribute to a culture of hostility in schools that is damaging to mental health and that undermines self-respect whilst it is in a fragile process of development. It may strengthen harmful social hierarchies in the next generation, undermining the future political equality of Muslims.

In response, we should first remember that political liberalism implies teaching respect for all, including those who hold conservative beliefs. Children should be taught that even where people make mistakes about what to believe, they should be regarded as equal citizens and must not be treated with hostility. In a context of high levels of Islamophobia, schools should be emphasising 'Muslim Respect' and including teaching aimed at countering the stigmatisation of Muslims.

Even in an environment where Muslims are not stigmatised, perhaps there is some damage done to the interests, equality, and self-respect of Muslims by teaching directly a view that conflicts with a conservative Muslim belief. But it is implausible to suggest that the implied denial of one part of the conservative Muslim's belief-set – a denial that is in

fact already in the curriculum via the teaching of evolution – will cause damage to children on the same scale as the damages currently associated with the LGBT-Wrongfulness view that were flagged in Section 3. That is to say, prevalent beliefs in LGBT-Wrongfulness have a more denigrating effect, and are more directly linked with damage to children's wellbeing, equality, and self-respect, than prevalent beliefs about the fallibility of Scripture.

Thinking through this objection highlights that the case for LGBT Approval is made on the basis of children's interests in our contingent, nonideal circumstances. Perhaps circumstances might change and people might get better at keeping their beliefs about LGBT-Wrongfulness out of the public domain. The resulting lack of hostility would no doubt improve, although perhaps not eliminate, negative mental health outcomes for LGBT individuals. Or the LGBT-Wrongfulness view might become such a minority view that the worth and equal standing of LGBT individuals is no longer systematically undermined. In those circumstances, perhaps the state ought to retreat back to the more neutral position of LGBT Respect so as to avoid publicly countering the beliefs of conservative children.

However, note that some of the arguments in Section 3 would hold even in a world where there was widespread LGBT Respect and where the LGBT-Wrongfulness view was rare. The interests of LGBT children are harmed by themselves believing the LGBT-Wrongfulness view, for example via the damage done to fair access to relationships and to the ability to develop self-respect. There does seem to be a special, quite distinctive harm in believing that one's sexual identity is morally wrong. These remaining harms would need to be weighed against the harms caused by teaching LGBT Approval.

5. Implications for Teaching

The arguments in Section 3 support directive teaching aimed at LGBT Approval. But this aim does not imply a particular teaching method. In particular, it should not be taken to imply that schools should teach a positive attitude towards LGBT relationships in the same way as schools teach (for example) that World War II began in 1939. There are good reasons to favour a 'light-touch' approach, with discussion occupying a central role, when it comes to teaching controversial issues.⁷¹ One reason is to lessen the force of the objection just discussed. Whereas didactic teaching is more likely to make minority religious groups feel excluded or demeaned, an approach that encourages genuine discussion of controversial truth-claims is less likely to be perceived as 'unfriendly' to religious views. A second reason is that by giving opportunities for conservative views to be expressed, this provides an opportunity for counterarguments also to be expressed.

Discussion might also feature in classes aiming only at LGBT Respect. So, what are the differences in practice between teaching aimed at LGBT Approval and teaching aimed at LGBT Respect? Teaching LGBT Respect will primarily involve discussing respect and tolerance in general, with the aim of teaching children that even where people make mistakes about what is right and true, they should still be allowed to live according to their beliefs and still be given equal rights. So, schools are directive teaching a kind of universal respect. Depending on the school context and the beliefs of the particular students that make up a class, teaching LGBT Respect might require some specific discussion of LGBT issues to try to persuade some students that LGBT relationships fall within the scope of

tolerance. For example, it might require presenting empirical evidence that children brought up in same-sex families are not harmed in the way that anti-LGBT groups sometimes suggest they are. However, note that a teacher aiming only at LGBT Respect would not be able to fully counter this claim, since they must refrain from taking a stance on whether the child is being brought up in an 'immoral household'. If class discussion gets onto this issue of the morality of LGBT relationships, the discussion must be entirely open in direction.

This is where a key difference lies from a classroom where LGBT Approval is the aim. Classes aiming at LGBT Approval will be organised to include explicit discussion of the morality of LGBT relationships. This discussion will be steered – teachers will be guiding discussion with the intention of students coming to reject the belief that LGBT relationships are wrongful. The teacher's aim will shape their teaching in subtle but important ways. It will affect the research that the teacher undertakes to prepare for class so that they have information at hand that will counter arguments suggesting that LGBT relationships are wrongful. For example, they might familiarise themselves with Jewish, Christian, and Islamic scholarship in favour of LGBT Approval so that they are able to provide some counter to claims that there is only one religious view on LGBT relationships. They might familiarise themselves with theological disagreements over the divine truth of the Torah, Bible, and Qur'an. The aim of LGBT Approval will also affect the resources and evidence that teachers subsequently present in class. For example, teachers might present evidence of biological explanations for homosexuality, evidence which makes the views that homosexuality is 'unnatural' or involves turning away from God's will less plausible. In Birmingham, where there are high numbers of Muslims, the teacher might present an example of a lesbian Muslim, exploring in discussion how she attempts to render her behaviours consistent with her beliefs. The aim of LGBT Approval will also affect how the teacher frames and guides the discussion. For example, it will affect how often they decide to intervene to provide counterarguments, and it could affect the 'side' or point that the teacher chooses to end the discussion on.

I have suggested a light-touch approach, where teachers gently steer towards LGBT Approval through their choice of lesson materials and in the way they guide discussion and where students are allowed to question arguments in favour of LGBT Approval. Beyond this, individual teachers ought to decide the best methods and content for their particular classroom context. However, explicit guidance for teachers regarding the aims of LGBT relationships education is urgently required, to enable teachers to exercise their professional judgement in response to that aim. As this article has shown, there is a genuinely difficult dilemma here, and it is unfairly burdensome to leave decision-making about such matters up to individual teachers.

6. Conclusion

What should be the aim of LGBT-inclusive, state-mandated curricula in liberal, pluralist societies? To capture a concern with accommodating pluralism, I have sought to answer this question by appealing only to justifications that avoid taking a side on matters of reasonable disagreement. Adopting this political liberal restraint on legitimate political interventions initially seemed to suggest a curriculum limited in its aims to teaching that LGBT individuals exist and are entitled to equal rights: LGBT Respect. The curriculum should

not teach that LGBT relationships are ‘loving, healthy’ relationships, as England’s Department for Education has sometimes indicated it ought to.

Can the political liberal go any further? I have discussed possible justifications for the more controversial aim of LGBT Approval. Even in a world where everyone practised the dictum ‘love the sinner, hate the sin’, and where schools were free from hostility towards LGBT individuals, children would still be harmed, both in childhood and in their future adult lives, by the view that LGBT relationships are wrongful. This belief contributes to poor mental health, restricts access to the life-goods of romantic relationships and sexual satisfaction, and causes shame and guilt that damages the autonomy of LGBT individuals. School teaching aimed at LGBT Approval would go at least some way to push against these harms. An aim of LGBT Approval may also help contribute to ensuring the political equality of LGBT individuals. Last, the aim of LGBT Approval helps fulfil the state’s obligation to provide an environment for children that enables the development of self-respect. These justifications are intended to be neutral, in the sense that they offer justification even to someone who believes that LGBT relationships are, as a matter of fact, wrongful. Thus if these justifications are successful, curricula aiming at LGBT Approval pass the political liberal justificatory neutrality test for legitimate political interventions.

I have proposed these justifications in a tentative manner. Against the case for LGBT Approval, we might wonder whether a curriculum that aims hard at LGBT Respect – going beyond most existing curricula – is sufficient to protect children’s wellbeing, equality, and self-respect. Whether this is so depends on tricky empirical questions. Can someone’s belief in LGBT-Wrongfulness be completely isolated, so that it does not affect, even unconsciously, their treatment of LGBT individuals? Can LGBT individuals’ assessments of their personal worth remain unaffected by beliefs about LGBT-Wrongfulness in themselves and others? Whilst it is hard to assess these questions at present against a backdrop of widespread LGBT intolerance, I am pessimistic that either question can be answered affirmatively. Thus I tentatively conclude that there exists, on the basis of the reasons discussed, a cumulative case for state-mandated curricula aiming at LGBT Approval, at least in our current nonideal circumstances.

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NOTES

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- 3 Department for Education. 2020b. "Relationships Education, Relationships and Sex Education (RSE) and Health Education: Statutory Guidance." July 9, 2020. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908013/Relationships_Education__Relationships_and_Sex_Education__RSE_and_Health_Education.pdf. Accessed 20 February 2023.
- 4 Department for Education 2020a.
- 5 However, the relationship between religion and LGBT is not always antagonistic. These religious traditions all have liberal strands that hold positive attitudes towards LGBT individuals. Indeed, religion can sometimes be mobilised as a form of support for LGBT youth (Taylor, Yvette, and Karen Cuthbert. 2019. "Queer Religious Youth in Faith and Community Schools." *Educational Review* 71(3): 382–96).
- 6 Some US states have gone in the opposite direction, with 'Don't Say Gay' bills in place that prohibit educators from discussing LGBT people and issues as part of curricula. This makes it even more important to 'get it right' where LGBT-inclusive curricula are in place. See Buchholz, Katharina. 2022. "The State of LGBTQ Education in the U.S." *Forbes*, March 30, 2022. <https://www.forbes.com/sites/katharinabuchholz/2022/03/30/the-state-of-lgbtq-education-in-the-us-infographic/?sh=d640051f1407>. Accessed 20 February 2023.
- 7 Tim Fowler's discussion of different attitudes that citizens might take to homosexual relationships, where he distinguishes between 'Toleration' and 'Acceptance' views, influenced this article. Fowler, Tim. 2020. *Liberalism, Childhood and Justice: Ethical Issues in Upbringing*. Bristol: Bristol University Press, p. 81.
- 8 Darwall, Stephen. 1977. "Two Kinds of Respect." *Ethics* 88(1): 36–49. Darwall contrasts recognition respect, the regard due to all persons in virtue of them being persons, with appraisal respect, an attitude of positive appraisal responding to a person's character traits.
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- 10 Rawls, John. 2005. *Political Liberalism* (Expanded Edition). New York: Columbia University Press, p. 170.
- 11 On the distinction between directive and nondirective teaching, and its separation from questions of didactic versus nondidactic teaching methods, see Hand, Michael. 2018. *A Theory of Moral Education*. Abingdon: Routledge, p. 37.
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- 18 E.g. Chambers, Clare. 2017. *Against Marriage: An Egalitarian Defence of the Marriage-Free State*. New York: Oxford University Press; Brake, Elizabeth. 2012. *Minimizing Marriage: Marriage, Morality, and the Law*. New York: Oxford University Press.
 - 19 The term 'amatonormativity' was coined by Elizabeth Brake to refer to 'the assumptions that a central, exclusive, amorous relationship is normal for humans, in that it is a universally shared goal, and that such a relationship is normative, in that it should be aimed at in preference to other relationship types' such as friendship (Brake 2012 op. cit., pp. 88–89).
 - 20 For an explicitly political liberal defence of extensive and mandatory personal relationships education in schools, see Cormier, Andr  e-Anne. Forthcoming. "Intimate Justice: A Liberal Case for Mandatory Relationship Education." In *The Future of Education: Reimagining Its Aims and Responsibilities*, edited by Jonathan Beale and Christina Easton. Oxford: Oxford University Press.
 - 21 Rawls 2005 op. cit., p. 199.
 - 22 Ibid., p. 180.
 - 23 Ibid., p. 187.
 - 24 Gheaus, Anca. 2018. "Children's Vulnerability and Legitimate Authority over Children." *Journal of Applied Philosophy* 35(1): 60–75.
 - 25 E.g. Stonewall. 2017. "School Report: The Experiences of Lesbian, Gay, Bi and Trans Young People in Britain's Schools in 2017." https://www.stonewall.org.uk/system/files/the_school_report_2017.pdf. Accessed 20 February 2023.
 - 26 Rawls, John. 1973. *A Theory of Justice*. Oxford: Oxford University Press, p. 62.
 - 27 Stonewall op. cit.
 - 28 These benefits might extend to heterosexuals, who also suffer as a result of hostility and negative attitudes towards LGBT individuals. For example, heterosexual teenage boys are also the subject of "fag discourse" – homophobic taunts and threats targeted at those perceived as displaying momentary lapses in masculinity (Pascoe, C.J. 2013. "Notes on a Sociology of Bullying: Young Men's Homophobia as Gender Socialization." *QED: A Journal in GLBTQ Worldmaking* 1: 87–104).
 - 29 Fowler op. cit., p. 82.
 - 30 For example, Heiden-Rootes, Katie, Ashley Wiegand, Danielle Thomas, Rachel M. Moore, and Kristin A. Ross. 2020. "A National Survey on Depression, Internalized Homophobia, College Religiosity, and Climate of Acceptance on College Campuses for Sexual Minority Adults." *Journal of Homosexuality* 67(4): 435–51.
 - 31 Note that this is not the same as saying that romantic relationships are essential for flourishing. Whilst romantic relationships are a key constituent of the flourishing life for many people, for others they are unimportant.
 - 32 Brownlee, Kimberley. 2013. "A Human Right Against Social Deprivation." *Philosophical Quarterly* 63: 199–222; Brownlee, Kimberley. 2020. *Being Sure of Each Other: An Essay on Social Rights and Freedoms*. Oxford: Oxford University Press.
 - 33 Cordelli, Chiara. 2015. "Justice as Fairness and Relational Resources." *Journal of Political Philosophy* 23(1): 86–110; Cormier op. cit.
 - 34 Fowler op. cit., p. 82.
 - 35 Sadusky, Julia A. 2019. "Loneliness and the Celibate, Gay Christian." PhD diss., Regent University.
 - 36 Fowler op. cit., p. 25; Nussbaum, Martha. 2000. *Women and Human Development: The Capabilities Approach*. Cambridge: Cambridge University Press. Nussbaum's approach has been criticised for implying that since sexual satisfaction is part of a life well-lived, the asexual who refrains from sex lives a deficient life (Begon, Jessica. 2017. "Capabilities for All? From Capabilities to Function, to Capabilities to Control." *Social Theory and Practice* 43(1): 154–79; Brunning, Luke, and Natasha McKeever. 2021. "Asexuality." *Journal of Applied Philosophy* 38(3): 497–517). Rather than make the claim that sexual satisfaction is important to the flourishing of everyone, I just want to say that across a wide range of conceptions of the good, people can agree that sexual satisfaction is important to many people's flourishing.
 - 37 In some cases of 'sexual deviance' such as paedophilia, shame and guilt are justified responses. Neutral considerations (including the need for informed consent) explain why my argument does not apply to such cases.
 - 38 Brighouse, Harry, and Adam Swift. 2014. *Family Values: The Ethics of Parent–Child Relationships*. Princeton, NJ: Princeton University Press; Andersson op. cit.
 - 39 Phelps-Roper, Megan. 2019. *Unfollow: A Journey from Hatred to Hope, Leaving the Westboro Baptist Church*. London: Riverrun, p. 115.

- 40 For examples, see the website 'Reddit Ex-Catholic'. <https://www.reddit.com/r/excatholic/>. Accessed 20 February 2023. For an interview study with gay men, see Figueroa, Victor, and Fiona Tasker. 2014. "I Always Have the Idea of Sin in My Mind ...": Family of Origin, Religion, and Chilean Young Gay Men." *Journal of GLBT Family Studies* 10(3): 269–97.
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- 42 Clayton, Matthew. 2006. *Justice and Legitimacy in Upbringing*. Oxford: Oxford University Press, p. 11.
- 43 Chambers, Clare. 2004. "Are Breast Implants Better Than Female Genital Mutilation? Autonomy, Gender Equality and Nussbaum's Political Liberalism." *Critical Review of International Social and Political Philosophy* 7(3): 1–33.
- 44 For example, Macedo op. cit.
- 45 Moller Okin, Susan. 1989. *Justice, Gender, and the Family*. New York: Basic Books; Schouten, Gina. 2019. *Liberalism, Neutrality, and the Gendered Division of Labor*. Oxford: Oxford University Press; Watson and Hartley; Chambers 2004 op. cit.
- 46 Calhoun, Cheshire. 2000. *Feminism, the Family, and the Politics of the Closet: Lesbian and Gay Displacement*. New York: Oxford University Press, pp. 104–5.
- 47 Hellman, Deborah. 2008. *When Is Discrimination Wrong?* Cambridge, MA: Harvard University Press.
- 48 Watson and Hartley op. cit.
- 49 E.g. Nordell, Jessica. 2021. "This Is How Everyday Sexism Could Stop You from Getting That Promotion." *The New York Times*, October 14, 2021. <https://www.nytimes.com/interactive/2021/10/14/opinion/gender-bias.html>. Accessed 20 February 2023.
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- 51 Ibid.
- 52 Rawls 1973 op. cit., p. 440.
- 53 Dillon, Robin S. 2018. "Respect." In *The Stanford Encyclopedia of Philosophy* (Spring), edited by Edward N. Zalta; Rawls 1973 op. cit., p. 179. <https://plato.stanford.edu/archives/spr2018/entries/respect/>. Accessed 28 February 2023.
- 54 Rawls 1973 op. cit., p. 440.
- 55 Clearly the state's obligations to remove obstacles to self-respect must be restrained by other neutral considerations. For example, it might be core to someone's sexual identity that they are attracted to children, but paedophilia is ruled out by the need for informed consent.
- 56 This literature begins with a seminal study by Allen, David J., and Terry Oleson. 1999. "Shame and Internalized Homophobia in Gay Men." *Journal of Homosexuality* 37(3): 33–43.
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- 61 Watson and Hartley op. cit., p. 153.
- 62 Ibid., p. 154.
- 63 Brake 2013 op. cit., p. 68.
- 64 Ibid., p. 70.
- 65 Gheaus 2018 op. cit.; Fowler op. cit., p. 11.
- 66 Fowler op. cit., p. 81.
- 67 Brunning and McKeever op. cit., pp. 498, 509.
- 68 Gheaus 2018 op. cit.
- 69 Gheaus 2023 op. cit.
- 70 Brighouse and Swift op. cit. This view of parental rights is consistent with political liberalism's requirement of justificatory neutrality (e.g. Clayton op. cit.).
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