

Inquiry into Nationhood, National Identity and Democracy

Legal and Constitutional Affairs Committee

Submission by the Social Global Studies Centre, RMIT University

1. Introduction

The Social Global Studies Centre welcomes this opportunity to make a submission to the Senate Legal and Constitutional Affairs Committee on matters raised by this Inquiry into Nationhood, National Identity and Democracy. Staff in the Centre are concerned by the apparent erosion of democratic norms globally and the challenges to Australia's democratic system posed by the corrosion of trust in public institutions. The Inquiry raises the apparent weakening of social bonds and the increasing demands for governments to replace traditional social structures reason for a claimed contraction of 'civil society' leading to the demise of democratic engagement.

While acknowledging populist extremist groups are gaining political traction within Australia, we would contend that the appeal of these movements is strengthened by governmental failure to address a wide range of critical public interest issues. These issues include, the incidence and perception of official corruption, regulatory failures in the Australian finance industry, climate change, and the growing racism towards migrants from the Middle East and more recently from China. This submission concentrates on two concerns, namely climate change and the amplification xenophobia in Australian society. We would suggest that both relate to matters of public confidence in the democratic process. The Centre also seeks to present more positive news about the changing dynamics of civil society in Australia to drawing attention to global civic engagement by younger Australians outside the sphere of parliamentary and party politics.

2. Trust in Institutions

Australians have every right to scrutinise and to criticise their governments and the institutions through which Australian society is governed. This right extends to the questioning of public authority and expert opinion and is contingent on the public being truthfully informed. It is worrying to see the enjoyment of this fundamental democratic right increasingly constrained by the invocation of national security prerogatives with regard to the former and the vilification of those experts whose opinions do not support the policies of the government of the day.

The scientific consensus is that the Earth's climate is warming in ways that present a fundamental global ecological and political challenge and that urgent steps are imperative to arrest climate change and mitigate its effects.¹ Opinion polling in Australia and Europe

¹ Australian Academy of Science (2015) *The Science of Climate Change: Questions and Answers*. <<https://www.science.org.au/files/userfiles/learning/documents/climate-change-r.pdf>> (September 12, 2019). National Aeronautics and Space Administration (NASA) (c. 2019) "Scientific Consensus: Earth's Climate is Warming". Facts < <https://climate.nasa.gov/scientific-consensus/>> (September 12, 2019)

suggests majority public support for action to address global warming, with support strongest amongst those who identify with ‘left-of-centre’ political ideas.²

People with ‘right-of-centre’ views tend to be more skeptical about the science of climate change. Cross-national analysis of ‘climate skepticism’ suggests a cultural bias against climate science amongst people whose politics are defined by religious belief or whose political values are challenged by the policy implications of adaptation.³ Appealing to this constituency risks increasing distrust of those institutions and persons that argue for effective governmental action on climate change.

The environmental policy rhetoric and practices of current ‘right-of-centre’ governments – in the United States and Brazil for instance - echo populist rejections of climate science, with the notable exception of the United Kingdom, where there is bipartisan agreement on the reality of a global “climate emergency”.⁴

There are other issues undermining public confidence in UK parliamentary democracy that are unlikely to be impacted in any way by the political consensus on climate change. In Australia by way of contrast, federal government reluctance to engage wholeheartedly in global environmental diplomacy and the apparent ambivalence towards the Paris Agreement signals a degree of official skepticism that implies a corrosive disdain for majority expert scientific opinion and for the institutions of scientific research in Australia and overseas tasked with explaining and providing high level advice on the Earth’s changing environment.

The view of researchers in the Social Global Studies Centre’s is that this ambivalence emboldens extremist elements in Australian society by reinforcing prejudices against ‘liberal’ intellectual elites and perpetuating the myth of a global climate conspiracy in which Australian climate scientists and activists are allegedly complicit.⁵

Furthermore, if a majority of surveyed Australians, from across the political spectrum, agree that climate change is real, the refusal to accord the highest priority to reducing carbon emissions can reasonably be assumed to be a contributing factor to rising public disillusionment with the democratic process.⁶

² Katharine Steentjes, Nick Pidgeon, Wouter Poortinga, Adam Corner, Annika Arnold, Gisela Böhm, Claire Mays, Marc Poumadère, Michael Ruddat, Dirk Scheer, Marco Sonnberger, and Endre Tvinnereim, *European Perceptions of Climate Change: Topline Findings of a Survey Conducted in Four European Countries in 2016*. (Cardiff: Cardiff University, 2017). Ebony Bennett, *Climate of the Nation 2018: Tracking Australia’s Attitudes Towards Climate Change and Energy* (Canberra: Australia Institute, 2018), 7-10. Min Zhou, “Public Environmental Skepticism: A Cross-National and Multilevel Analysis,” *International Sociology*, 30:1 (2015): 61-85. Annika Skoglund and Johannes Stripple, “From Climate Skeptic to Climate Cynic,” *Critical Policy Studies*, 13-3 (2019): 345-365.

³ Zhou, “Public Environmental Skepticism,” 64-65.

⁴ Though some senior Conservative politicians are uncomfortable with the use of the word “emergency”. For example, former UK Secretary of State for Environmental, Food and Rural Affairs, Michael Gove, <https://hansard.parliament.uk/commons/2019-05-01/debates/3C133E25-D670-4F2B-B245-33968D0228D2/EnvironmentAndClimateChange> (September 12, 2019).

⁵ SBS News, “Hanson Denies Humans Behind Climate Change, Blames ‘Fearmongering,’” April 23, 2016 <<https://www.sbs.com.au/news/hanson-denies-humans-behind-climate-change-blames-fearmongering>> (September 12, 2019). BBC News, “Australia Senator Malcolm Roberts Calls Climate Change a UN Conspiracy,” (August 5, 2016). <<https://www.bbc.com/news/world-australia-36972449>> (September 12, 2019)

⁶ Rachel Martens, “Swinburne Launches Australian Leadership Index,” (July 25, 2016). <<https://www.swinburne.edu.au/news/latest-news/2019/07/swinburne-launches-australian-leadership-index.php>> (September 20, 2019).

Populists from the left and right share common characteristics. They are anti-elite and anti-establishment, with elites condemned for immorality, selfishness, and greed, and the established order cast as distant from and hostile to the ‘ordinary’ mass of ‘hard working’ ‘decent’ people. Populists are rhetorically democratic but deeply anti-plural in that they cannot accept the legitimacy of contrary arguments that challenge their subjective need to represent an ‘authentic’ and moral majority.⁷

It is however a mistake to dismiss this incongruence as evidence of shallowness and irrationality on the part of those attracted to populist agendas. Disappointment with the established order is an understandable, rational response to protracted global financial crises, seemingly endless overseas military interventions, and intractable social inequalities at home.

3. Political Fracturing

Increasing diversity of social and cultural identities and the democratisation of knowledge are features of an information-enriched, globalised world and are to be welcomed. Australians have largely become accustomed to globalisation and have avoided the worst of the GFC, still, anti-globalist, and ‘nativist’ voices are becoming more strident and confident.

Anti-immigration populism manifests on the far right and left of Australian politics. However, in certain sections of the Australian media, “alt-right” populist views are either openly voiced or countenanced to an alarming degree – and in ways that potentially amplify fears of a loss of sovereign ‘birthrights’ and reinforce belief in a conspiracy against ‘ordinary working Australians’ – which can be interpreted as code for “White Australians” - by distant and disdainful liberal intellectuals and policy elites.

Sympathy with the plight of distant others is strained by amplified fear of a loss of control over national borders and of a threat to majority identity at home. Terrorism and the dreaded risk of terrorist attack is deterring people in most receiving countries from welcoming more refugees and, in the process, provides renewed opportunities for political gain.⁸ This tendency is apparent in Australia, where negative attitudes towards asylum seekers are widely held and actively encouraged in some quarters.⁹

Those experiencing economic hardship, or facing immanent loss of social status, seek out explanations for their circumstances, and look for scapegoats in the guise of immigrants judged to be threatening to ‘rob’ them their ‘place in the sun’¹⁰ This might, in part explain the increasing tolerance for asylum seeker deportations Australian opinion polling.¹¹

⁷ Jan-Werner Müller, *What is Populism?* (London: Penguin Books, 2017), 28-32.

⁸ Zygmund Bauman, *Strangers at Our Door*, (Cambridge: Polity, 2016), 16.

⁹ Alex Oliver, *The Lowy Institute Poll, 2017*, 14-15

<<https://www.lowyinstitute.org/sites/default/files/documents/lowy-2017-pollreport-web.pdf>> (20 February 2018).

¹⁰ Bauman, *Strangers at Our Door*, 112.

¹¹ Guardian Essential Poll, April 24, 2018 <<https://www.theguardian.com/australia-news/ng-interactive/2018/apr/24/the-guardian-essential-report-24-april-results>> (June 3, 2018). Guardian Essential Poll, May 30, 2017 <<https://www.theguardian.com/australia-news/ng-interactive/2017/may/30/the-guardian-essential-report-30-may-results>> (June 3, 2018)

There is very disturbing evidence of significant resentment towards persons of the Islamic faith from the Middle East and South Asia.¹² Importantly, these attitudes are not confined to a single or small number of social groups, distinguishable by low incomes, precarious employment and low levels of educational attainment.¹³ The argument that anti-immigrant and anti-globalist sentiment reflects the views only of those ‘left behind’ by globalisation is dangerously misleading.

One useful barometer of racism in Australia might well be publicly expressed attitudes towards Indigenous Australians. There is strong support for Indigenous self-determination and land rights and for constitutional recognition for “First Nations”.¹⁴ Nonetheless, Reconciliation Australia’s “Reconciliation Barometer” (2016) provides a reminder that racism towards Indigenous Australians remains widespread and takes many forms, from maltreatment at the hands of the state to persistent and increasing social prejudice, including verbal abuse and physical assault.¹⁵

One ray of hope is the finding that non-indigenous and Indigenous people in the 18-39 age group are more likely to hold high levels of trust in each other, with Aboriginal and Torres Strait Islander Australians significantly more trusting.¹⁶

One lesson from Australian debates on asylum seekers and immigration, Indigenous recognition and indeed on the legalisation of same sex marriage, is that political issues can be as divisive as political leaders want them to be. Social division and misinformation serve political agendas in ways that reasoned and balanced debate seemingly does not.

4. Identity Politics

The Inquiry draws attention to the rise of identity politics as a possible contributor to declining public engagement with the democratic process. If the politics of identity is a factor then, arguably, it is the politics of white identity that is most divisive (Tim Soutphommasane cited in Karp, 2018).¹⁷ Australian ‘identitarianism’ and ‘white pride’ lurk at the fringes of politics and action, but the impact of these ideas on ‘mainstream’ political debate is undeniable and their potential for deeper impacts in the future should not be underestimated.

¹² Kathleen Blair, Kevin Dunn, Alanna Kamp, and Oishee Alam, *Challenging Racism Project: 2015-15 National Survey Report*, (Penrith: Western Sydney University, 2017) <http://westernsydney.edu.au/challengingracism/challenging_racism_project/our_research/face_up_to_racism_2015-16_national_survey> (5 April 2018)

¹³ Katharine Betts, and Bob Birrell, *Australian Voters’ Views on Immigration Policy*, (Australian Population Research Institute, 2017)

<<http://tapri.org.au/wp-content/uploads/2016/04/TAPRI-survey-Oct-2017-final.pdf>> (16 April 2018).

¹⁴ Matthew Gray, and William Sanders, *Australian Public Opinion on Indigenous Issues: Injustice, Disadvantage and Support for Recognition*, ANU Poll, Report no. 17, (Canberra: Social Research Centre, 2015), 3-4. Committee for the Economic Development of Australia (CEDA), *Information Paper - Constitutional Reform: Referendums in Australia*, (Melbourne: CEDA, 2016)

<https://www.ceda.com.au/CEDA/media/Attachments/PDF/32567-InformationPaper_constitutionalreform_FINAL.pdf> (September 14, 2019).

¹⁵ Reconciliation Australia, *2016 Australian Reconciliation Barometer*, (Sydney: Polity Research and Consulting, 2016), 18, 61 <https://www.reconciliation.org.au/wp-content/uploads/2017/11/RA_ARB-2016_Full-report_FINAL-1.pdf> (2 October 2018).

¹⁶ Reconciliation Australia, *2016 Australian Reconciliation Barometer*, 21-22.

¹⁷ Paul Karp, “Race Politics is Back”, *Guardian*, (August 6, 2018) <<https://www.theguardian.com/world/2018/aug/06/race-politics-is-back-race-commissioner-exits-with-parting-shots-at-conservatives>> (August 6, 2018).

Australia is a grossly unequal society, and this inequality manifests in ways that cannot be ‘averaged out’. Indigenous Australians are the most socially disadvantaged and the most vulnerable to poor health outcomes, low incomes, and racial discrimination. The vast majority of Australians are, still, of European origin and enjoy significant wealth and social privileges by comparison. Furthermore, there is no evidence whatsoever that these privileges are under threat from without or within.

There are many caveats to claimed Australian values of the ‘fair go’, ‘mateship’ and egalitarianism. These caveats, explicit or unconscious, include issues of a person’s physical appearance; their race, ethnicity, gender, and their moral qualities, their industriousness or loyalty for instance. This bias is intensified by heightened receptivity to arguments in favour of exclusion, the expression of racialized resentment, and the ratification of individual alarm through the collective, if vicarious, media-mediated experience of global terrorism.

The capacity to identify with a distant others’ circumstances and to feel a sense of obligation or ‘duty’ towards them underpin all forms of social cooperation from sophisticated electoral processes to the survival of social groups.¹⁸

Studies of altruism, defined as “disinterested concern for another’s welfare”¹⁹, advance the claim that helping is a conditioned survival strategy among humans and primates. Empathy is not innate, and humans are egotistical, but there are degrees of each along a continuum of altruism and egoism. Some people can be more egotistical or altruistic than others.

The *raison d’être* of the territorial nation state is to control territory and people, and to limit membership of the nation (or state) in order to preserve the benefits of the majority of those who depend upon it for their economic welfare. Some states are more reluctant than others to extend full citizen benefits to all strangers who arrive, by whatever means. Canada, in contrast to Australia, is receptive to asylum seekers.²⁰ Canada claims to be one of the most open and accepting countries for migrants but perceptions of economic and cultural threat, if not physical threat, are significant factors affecting public attitudes in this policy space.²¹

¹⁸ Juris G. Draguns, “Altruism in Its Personal, Social, and Cultural Contexts: An Introduction,” in *Altruism in Cross-Cultural Perspective*, ed. Douglas A. Vakoch, (New York: Springer, 2013), 1-16. Richard Jankowski, *Altruism and Self-Interest in Democracies*, (New York: Palgrave, 2015). Telmo Pievani, “Born to Cooperate: Altruism as Exaptation and the Evolution of Human Sociality,” in *Origins of Altruism and Cooperation*, ed. Robert W. Sussman, and C. Robert Cloninger (New York: Springer Science, 2011), 41-63.

¹⁹ Robert W. Sussman, and C. Robert Cloninger, “Introduction: Origins of Altruism and Cooperation,” in *Origins of Altruism and Cooperation*, ed. Robert W. Sussman, and C. Robert Cloninger (New York: Springer Science, 2011), 1-7.

²⁰ Catherine Dauvergne, *Humanitarianism, Identity and Nation: Migration Laws of Australia and Canada*, (Vancouver: UBC Press, 2005) 123-124.

²¹ Environics Institute, “Focus Canada 2018: Canadian Public Opinion about Immigration and Minority Groups”. (Canadian Race Relations Foundation and Environics Institute for Survey Research, Winter, 2018) <https://www.environicsinstitute.org/docs/default-source/project-documents/focus-canada-winter-2018---immigration-and-minority-groups/focus-canada-winter-2018-survey-on-immigration-and-minority-groups---final-report.pdf?sfvrsn=ede94c5f_2> (June 30, 2018). Timothy B. Gravelle, “Partisanship, Local Context and Group Threat: Canadian Attitudes Towards Immigration and Refugee Policy,” *Migration Studies*, (2017), 2-20 <mnx058, <https://doi-org.ezproxy.lib.rmit.edu.au/10.1093/migration/mnx058>> (June 20, 2018)

Public support for Canada's immigration policy however stands at 60 per cent in 2018, marginally down on the previous year.²² A slight decline in the number of positive responses in Canadian public opinion surveys needs to be seen in the context of a generational shift in favour of immigrant and refugee settlement since the mid-1990s, when as many as 70 per cent of surveyed Canadians believed that immigration was "too high" and 79 per cent suspected that "refugee claimants" were disingenuous.²³

Explanations for the dramatic turnaround can arguably be found in Canada's adoption of a human security-oriented foreign policy in the 1990s. Canada's mission in the world was redefined by former foreign minister, Lloyd Axworthy, as the pursuit disarmament, humanitarian engagement and development assistance.²⁴ Policy leadership by government recrafted Canadian national identity and aligned it to the cause of international human security.

Identity and security - also tightly bound in the minds of a majority of Australians - are crucial in shaping popular attitudes towards the outside world. Australia's national identity is not, anymore, linked to liberal internationalism in ways that it once was but instead, national purpose is framed by official concern for the defence of the nation against external threats; terrorists, drug and people traffickers and the enhancement of national competitive advantage. There is a commitment to a rules based international order in official foreign policy discourse but there is a danger that anti-globalist populism at home will restrict Australia's capacity to pursue its international obligations abroad.

Informed debate about Australia's humanitarian obligations under international law is lacking in the Australian media where there is a powerful bias against international institutions, particularly the United Nations. Australian relief agencies also do not feature widely in the news, except in times of public controversy or scandal. This apparent disinterest perhaps mirrors the marked decline in Australian giving to overseas humanitarian causes.²⁵

5. Civic Engagement Outside Politics

Evidence of disengagement from party politics and disillusionment with the democratic process should be balanced with recognition of the diverse ways in which people operate in civil society beyond, and in preference to, political institutions.

Census data indicates a rising trend in Australian volunteering in the not-for-profit sector - 17.8 (2011) and 19.2 (2016) per cent respectively- among the population aged 15 and over.²⁶

²² Environics Institute, "Focus Canada 2018". Donnelly, M. (2017) *Canadian Exceptionalism: Are We Good, or Are We Lucky?* McGill Institute for the Study of Canada.

https://www.mcgill.ca/misc/files/misc/misc_surveyreport_0.pdf (July 26, 2018)

²³ Environics Institute, "Focus Canada 2018".

²⁴ Heinbecker, P. (2000) "The Concept of Human Security: A Canadian View". *The RUSI Journal*, 145:6, pp. 27-31. Remacle, E. (2008) "Approaches to Human Security: Japan, Canada and Europe in Comparative Perspective". *Journal of Social Science*. 66, pp. 5-34.

²⁵ National Australia Bank, "Charitable Giving Index 2018". < <https://business.nab.com.au/nab-charitable-giving-index-report-february-2018-29193/>> (September 14, 2019)

²⁶ Australian Bureau of Statistics, "2016 Census Quick Stats" *2016 Census*.

<https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/036> (September 13, 2019). Australian Bureau of Statistics (2011) "2011 Census Quick Stats" *2011 Census*.

https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2011/quickstat/0> (September 13, 2019) Volunteering Australia (2017) "2016 Census Reveals Australians Still Committed to Volunteering"

There are undoubtedly many more who work on what might be loosely termed charitable causes but for which they receive an income.

Research interviews conducted by the Social Global Studies Centre shed light on patterns of altruistic and humanitarian engagement among young people in Australia. Young people's journeys to altruistic work come into being through a coming together of biographical, existential and coincidental circumstances that motivated them to "do something" leading them to dedicate effort and time to their cause.

Proximity to otherness and disadvantaged people in youth are significant motivating factors. One respondent had herself experienced homelessness, having been involved in acquiring blankets for 'rough sleepers'. Another experienced an "aha moment" when on holiday in a remote island in Fiji; another found the motivation and interest whilst deployed in East Timor as a reservist.

Positive intentions were sometimes realised by undertaking (what is negatively referred to as) "voluntourism". One interviewee noted that her voluntourist experience as a late teenager was formative for her, although she now feels "conflicted" about it given the cogent critiques of voluntourism of which she has since become aware.

The young humanitarians interviewed were frustrated by the public's lack of understanding of how charities worked and the assumption that charitable work should not attract a wage. One respondent lamented that "I don't know why people don't understand that if you don't pay enough to get good people in, then you won't get good people. Do you not want a good person heading up the organisation?"

Another respondent noted that people are increasingly caught in their own media bubble, meaning that they are able to increasingly satisfy their personal interests and values without reference to anyone outside their selective social sphere. It was also observed that people are now able to avoid engaging with established humanitarian organisations and would do so owing to generic-ness of activity of the former, and a desire for greater directness between their effort or money and a specific desired impact. There is therefore an appetite for individualised and tailored experience, representing a new form of civic engagement and perhaps echoing preferences for a different kind of politics linked to direct action.²⁷

There are new avenues for altruistic social action through market mechanisms, such as micro-lending websites and social impact investing, that can be significant enablers of social welfare gains.²⁸ The market for public welfare is growing rapidly, globally but also in Australia, and this market sentiment seems to signal an investor belief that social needs can be met without fracturing social institutions like the family.²⁹

Media Release, June 27. <<https://www.volunteeringaustralia.org/wp-content/uploads/2016-Census-reveals-Australians-still-committed-to-volunteering.pdf>> (September 12, 2019)

²⁷ Julian C. H. Lee, Paul Battersby, Vandra Harris, Cecilia Hemana and Panayiota Romios, "Australia Turning Inwards? Insights from Humanitarian Australians," *The Round Table*, (2019):1-10. DOI: 10.1080/00358533.2019.1657729.

²⁸ Aya Ono (2016) "New Frontiers of Development: Social finance, the Latent Power of the Private Sector". *International Journal of Interdisciplinary Global Studies*. 11:3, pp. 1-24.

²⁹ Alice Uribe (2018) "Australian social impact investment market hits \$6 billion", *Australian Financial Review*, July 19. <<https://www.afr.com/companies/financial-services/australian-social-impact-investment-market-hits-6-billion-20180718-h12tnx>> (September 14, 2019)

Put another way, the upward trend in volunteering, other forms of unpaid work like disability work in the home (11.3 per cent of 2016 Census respondents) and impact investing, signals growing social needs which, if left unmet, can become a source of public disenchantment with government welfare policies and hence with the political process.

Australians are not uncharitable and charitable giving in Australia is consistently high, even as government and private spending on international aid experiences a pronounced decline.³⁰ Australian people have the capacity to be generous and civil and to pursue civic engagement without immersing themselves in often toxic and increasingly partisan democratic process.

6. Concluding Remarks

What is to be done? What is the way forward? Faith in the power of reason to overcome the hatred and ignorance with which strangers and their sufferings are greeted seems hardly sufficient, but that, it would seem, is what is needed, and this requires a greater not lesser role for government in promoting policies aimed at diminishing social hostility towards the socially disadvantaged, be these minority groups or people on welfare. There are potentially generational benefits to be earned from involving younger Australians in appropriate forms of social intervention in which they have a degree of autonomy over their own practice.

Prescriptions vary but have common themes and all require input from government. These are:

- a) *Social and civic responsibility* can be promoted through “conversations” “understanding” “knowledge” and “agreement” involving people of different social and cultural backgrounds, informed by an awareness of fundamental ethical principles governing peaceful human interactions.³¹
- b) *Intercultural experience* supported by education that promotes social and civic responsibility and an appreciation of different cultural starting points. Here there is scope for reflection on the meaning of social responsibility following on from a) above.
- c) *Language learning* to build the technical skills that enable negotiation and foster cooperation between people from linguistically diverse social groups.³²
- d) *Social entrepreneurship* is an emerging dimension in the Australian social sector and the development sector more broadly. People, often very young people, appear to be searching for opportunities for more autonomous and small-scale social interventions with increasing sophistication and conversance with new forms of aid financing sufficient to support micro-enterprise. The idea of public welfare needs reconceptualising to recognise, accommodate and encourage this trend.

³⁰ National Australia Bank, “Charitable Giving Index 2018”. < <https://business.nab.com.au/nab-charitable-giving-index-report-february-2018-29193/> > (September 14, 2019)

³¹ Jeff Malpas cited in Bauman. (2016) *Strangers at Our Door*. pp. 114-116. Joyce Apsel, (2011) “Educating a New Generation: The Model of the ‘Genocide and Human Rights University Program’,” *Human Rights Review* 12: 4 (2011): 465-486. Paul Bloom, *Against Empathy: The Case for Rational Compassion*, (London: Vintage, 2016).

³² Joseph Lo Bianco, *Conflict, Language Rights, and Education: Building Peace by Solving Language Problems in Southeast Asia*, (Language Policy Research Network, April, 2016)
<<http://www.cal.org/lpren/pdfs/briefs/conflict-language-rights-and-education.pdf>> (September 20, 2019)