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What were the main features of nineteenth century school acts?

Local school organization, basic schooling, a diversity of revenues and the institutional framework of an educational revolution

**Abstract**

This article explores the main features of the provision, organization and funding of nineteenth century European school acts. This article indicates that these promoted schooling that was basic, rather than compulsory, and provided a framework for schools funded by a diversity of revenues, and three types of local organization either based on the church, municipalities or several organizations. As a result, this article complements the analysis of determinants of rise of mass schooling, and the debate on decentralization, with an overview of European school acts and a theoretical challenge to further address the varying institutional framework of nineteenth-century schooling.

**Classification JEL:** N30, N33, H52

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## Introduction

The question of why the whole world is not equally educated remains key to the analysis of school systems. When explaining the strong performance of the United States educational system, Claudia Goldin and Lawrence Katz (Goldin 2001; Goldin and Katz 2003) identified key features of US educational institutions, in place by 1900, that determined the remarkable rise of mass schooling in that country. Founded on a basic principle of egalitarianism, Goldin (2001) described them as “public funding, openness, gender neutrality, local (and also state) control, separation of church and state, and an academic curriculum” (Goldin 2001, p. 265). In turn, they promoted “corollary virtues” such as the use of property taxes and school district competition. Like virtues, the authors acknowledge that these features may not be beneficial in all contexts, and while they do not reflect closer on the subject, their analysis of US education consequently raises questions regarding the virtues of European school systems. What were the features of nineteenth century European school systems that allowed enrolments to rise in, for example, England, France and Sweden?

The European school systems that the school acts regulated were to various extent decentralized (Westberg *et al.* 2019). That is, although national school acts regulated the content and volume of schooling from a central government level, and systems of state subsidies and school inspectors were established, the main responsibility for funding and administering the establishment of schools, the hiring of teachers and the organization of teaching remained at the local level (Cf. definition of decentralization in Bray, 1991).

While the question of whether decentralization promoted or hampered the rise of mass schooling remains debated (Lindert 2004; A'Hearn and Vecchi 2017, Cappelli 2015), less attention has been paid to *how* nineteenth century school systems were decentralized. In this article I will address this question by examining the key features of the institutional framework of European nineteenth-century primary schools. Basing my study on a comparative analysis of school acts and the school system they defined, I examine the school acts' regulations of the content and amount of educational provision, and their regulations on how schools were to be organized and funded. Did European school acts, as their US counterparts, promote free, publicly funded compulsory schooling based on secular local school organizations?

By providing an overview of nineteenth century European school acts, and their definitions of school age, expectations on attendance and so forth, this article indicates that these acts promoted schooling that was basic, rather than compulsory, and provided a framework for school funding based on distributional conflicts rather than egalitarian principles. In terms of local organization, this article proposes a typology of three kinds of local organization either based on the church, secular organizations, or a wide range of organizations.

In doing so, this article also poses questions regarding the relationship between enrolment rates and the provision, organization and funding of schooling as defined by the school acts. Although further studies are required to determine the actual impact of these institutional arrangements, I will suggest that inclusiveness in terms of age and gender, church support, mandatory obligations to establish schools, and mechanisms to distribute school spending across institutions or social groups may be considered as virtues that promoted schooling in these decentralized settings. Unlike Goldin and Katz, I will argue that these virtues were not built on egalitarian principles – the school acts were far from egalitarian – but rather on the

ability to organize and fund basic schooling for the laboring classes in a society marked by severe inequality.

In addition to this analysis of the school acts, following the advice quoted by Ogilvie and Carus (2014) that “everything should be made as simple as possible, but not simpler” (p. 469), I will suggest that we sharpen the definition of some of the main theoretical concepts of the literature in order to acknowledge the wide differences in public funding and local organization. Decentralization, public funding and compulsory schooling could take many forms, and we need research that accounts for the differences in local school organization among, for example, Italian *communi*, Swedish parishes, and Russian *zemstvos*.

### The institutional framework of educational growth

The role of institutions, both formal institutions governed by laws and regulations and informal institutions expressed in social norms and behavior, in economic growth have been addressed from a wide range of perspectives in economic history, inspiring economists and historians alike. Such research has, for example, dealt with core economic institutions in pre-industrial Europe, including serfdom, peasant communes, and the craft guilds (Ogilvie 2007). Studies of the national context of industrialization have examined the role of the domestic market, the supply of capital and credit, the liberalization of the labor market, deregulation of the grain market, and land reform (Magnusson 2000).

While this literature has provided many insights into the institutions that fostered economic growth, less is known about the institutional framework of primary schools that promoted educational growth. Instead, the research on the expansion of primary schooling has focused largely on the supply and demand of schooling, examining how these have been affected by determinants such as industrialization (Galor and Franck 2017), serfdom (Chaudhary *et al.* 2012; Cinnirella and Hornung 2016), landownership concentration (Goni 2013; Cinnirella and Hornung 2016), the distribution of political voice (Go and Lindert 2010; Nafziger 2011), and the wealth level and fiscal capacity of local school districts (Cappelli 2016; Montalbo 2019). The expansion of mass schooling (in terms of enrolment or educational expenditure) is explained either by the will of corporate actors, the demands of parents, or both (cf. Craig 1981).

By examining the institutional framework of nineteenth-century schooling, the present article adds to this research that has addressed issues of schooling, human capital and economic growth. First, the article contributes to studies that have addressed the impact of institutional features such as school organization, management, and funding. In addition to the above mentioned institutional virtues discussed by Goldin and Katz (2003), this research has for example examined the impact of state subsidies (Mitch 1986), colonial public investment (Chaudhary 2010), the institution of school patronage in the Habsburg Empire (Cvrček 2020), the use of common lands (Beltrán Tapia 2013), and school centralization reforms (Cappelli and Vasta 2020).

In the context of this research, this article’s main contribution is to the debate concerning the impact of decentralized school systems, where the power over schooling is largely devoluted to local bodies, who in these instances do not need to seek approval from

regional or national levels for their decisions in organizational or financial matters (Bray 1991, p. 375). Here, Lindert (2004) and Goldin (2001) stressed how local control fostered growth by allowing school districts to meet parental demand by making decisions about increasing educational investments that could not have been made at the central level. In contrast, studies on the Italian case have indicated the detrimental effects of decentralization on educational expansion and economic growth (Cappelli 2015; A'Hearn and Vecchi 2017). Instead, centralized funding (through state subsidies) has been shown to have a positive impact on the supply of education in Italy (Cappelli and Vasta 2020).

The present article adds to this debate on the impact of decentralization by offering an analysis of how nineteenth-century school acts designed decentralized school systems. Instead of examining whether the rise of schooling was promoted by a “spontaneous political will to levy local taxes in thousands of school districts” (Lindert 2004, p. 121), I will raise questions regarding what kinds of local school district organizations, educational provision, and school funding system promoted high enrolment rates. Contrary to Goldin and Katz analysis of the US case, I will suggest that in the European case, church support promoted schooling, and that not all local school organizations provided equally fertile soil for educational growth.

In so doing, this article contributes to those valuable studies of the determinants of schooling. As will be evident from this research, the impact of determinants occasionally varied across contexts. While landownership concentration had a negative effect on educational provision in England and Russia (Goni 2013; Nafziger 2011), this was not the case in Sweden (Andersson and Berger 2019) or the Habsburg Empire (Cvrček and Zajicek 2019). Instead of examining why elites or parents would support education, I provide further insights into how the institutions of schooling, as defined by school acts, channeled elite and popular attitudes towards mass schooling. Thus, this article raises further questions regarding, for example, how English school boards affected the impact of landholding elites, compared to the Habsburg *Schulpatronat* or the Italian *communi*. These are certainly important questions in a research field where the institutional setting is often presented merely as a historical context or an institutional framework in the background section of the article (see, e.g., Goni 2013; Cvrček and Zajicek 2019; Cinnirella and Hornung 2016).

Finally, by examining the institutional framework of schooling in nineteenth-century Europe, this article proposes theoretical challenges for future research on the determinants of educational growth. The overview of institutional arrangements in this article indicates the potential for further conceptual work. Although concepts such as compulsory schooling, public funding, school district, decentralization, and separation of church and state certainly capture aspects of nineteenth-century schooling that make them useful for many investigations, significant dimensions of the institutional framework of schooling remain invisible. As evident from below, an overview of nineteenth century school acts indicate that they did not entail compulsory schooling in the current usage of the term, but instead employed varying definitions of compulsiveness. These school acts also defined varying kinds of local school organization, and denoted varying forms of school funding. In this respect, the theoretical challenge that is posed here includes creating a framework that enables researchers to distinguish between the varying features of decentralized schooling organized by Swedish parishes, French communes, and Russian *zemstvos*.

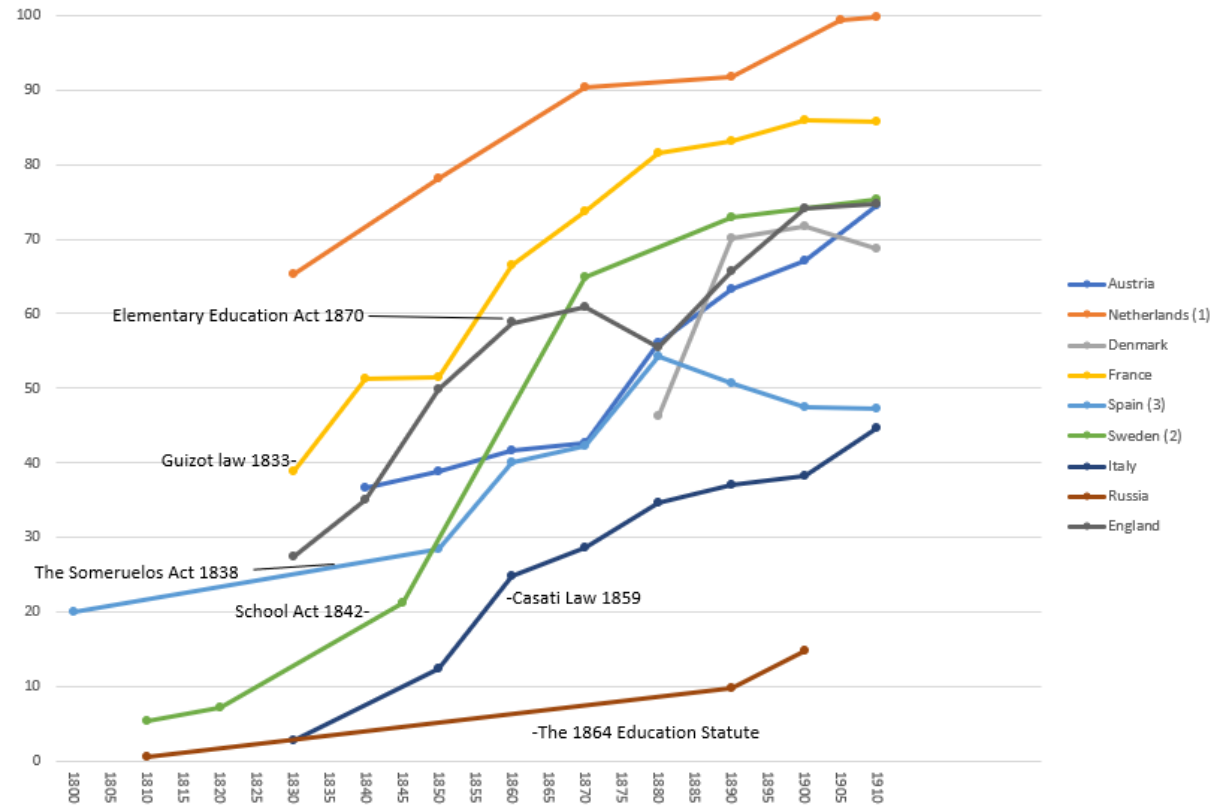
### Nineteenth century school acts

The school acts of the eighteenth, nineteenth and early twentieth centuries were a part of consolidation and formation of (nation-) states in Europe. Through these, the social, economic and political impact of states increased as they imposed taxes, regulations and standards on their inhabitants (Cardoso and Lains 2010). In this context, school acts were linked to the reform of existing states, and the creation of new nation states. Examples of the former include the General School Ordinance of 1774, which was part of the Maria Theresian reforms of the Habsburg Empire, and the Regulations for General Education, issued in 1869 as part of the Tanzimat-reforms of the Ottoman Empire. These also include the Russian 1864 Education Statute, which was part of the major reforms of the Russian Empire which followed on the defeat in the Crimean War of 1853-1856, and the Decree of Elementary Education in the Grand Duchy of Finland in 1866 (Viehhauser 2019; Eklof 2019; Westberg et al. 2018).

In these state formation processes, school acts were often created when new constitutions were enacted. When the Helvetic Republic (Switzerland) received its constitution in 1798, a school act followed a year later, and when the Batavian Republic (Netherlands) received its constitution in 1801, a new school act was passed in 1801. In Spain, the constitution of 1837 was followed by the The Someruelos Act and the Montesino Regulation in 1838 (Mallorquí-Ruscalleda 2019). In France, new constitutions were enacted in 1791, 1793, 1795, 1799, 1814 and 1830, and various kind of school acts adopted in 1792, 1794, 1795, 1802, 1816, and 1833 (Tröhler 2016).

These school acts had varying relationships to the expansion of schooling (see Figure 1). In some cases, school acts regulated schooling when enrolment rates already were comparatively high, as in England in 1870, and where enrolments were low, as in Spain in 1838. The school acts had varying impacts. In Switzerland, the Stapfer School Act remained a draft, only parts of which were passed by the parliament of the Helvetic Republic, but nevertheless won an impact as a source of inspiration for cantonal school systems (Boser *et al.* 2019, p. 74). In France and Sweden, the school acts of 1833 and 1842 were followed by an expansion in terms of primary school enrolment (Alix 2019; Westberg 2019), while the educational growth after the Italian Casati Law of 1859 was unassuming (Cappelli 2019). In Russia, the Education Statute of 1864 was even followed by a reduction of certain kinds of schools (Brooks 1982, p. 252).

**Figure 1.** School acts and enrolment rates (ages 5–14), 1800-1930.



Sources: Lindert 2004, tab. 5.1; Albers 1997; Ljungberg and Nilsson 2009; Bandiera et al. 2019; Houston 2002, p. 23, 52. Note: <sup>(1)</sup>Enrolment rate for ages 6-12; <sup>(2)</sup>Enrolment rate for ages 7-14; <sup>(3)</sup>The actual year for 1800 is 1797, and concerns Castile.

Although school acts thus were integral parts of both developments within and outside of nineteenth century school systems, they occupy a peculiar position in the historiography of schooling. Once heralded by traditional historians of education, who focused on pioneers and major legislative landmarks, school acts have in recent decades been out of focus in many disciplines. For social and intellectual historians alike, school legislation has been perceived as an expression of an old-fashioned and excessive concern with educational legislation (Eklof 1986). For economic historians, school acts have generally merely remained a part of the historical background that provides context and setting, but is rarely in focus of the actual analysis (for exceptions, see Margo and Aldrich Finegan 1996; Clay *et al.* 2012; Bandiera et al. 2019).

Nevertheless, school acts are an excellent source for the institutional arrangements of nineteenth-century primary schooling. Obviously, the regulations were followed to varying degrees and their overarching aims were seldom met. The testimonies of parents' unwillingness to send their children to school, teacher's inability, and local school boards disinterest are numerous, even in school systems with comparatively high levels of enrolment such as that of Sweden (Larsson and Westberg 2020). Still, school acts provide the general outlines of what was meant by primary schooling, and distributed responsibilities for the organization and funding of a school system. This included definitions of school-age, to what respect schooling was compulsory, what kind of attendance that was expected, and the content of schooling. In addition, school acts provide description of the

organizations responsible for providing schooling, while also providing information regarding those who was expected to pay for schooling, and how those costs were to be distributed.

In order to conduct a comprehensive analysis of European school acts, this article builds on existing research that provides excellent opportunities to examine them in detail. Here, a recently finished book project on the international history of school acts has been crucial (Westberg *et al.* 2019). The present article focuses on the ten school acts listed in Table 1, which highlights the

. These include some of the best-known school acts, such as the Guizot Law of 1833 and the Elementary Education Act of 1870, and cover school acts in countries with high enrolment rates (such as Denmark and Sweden), and comparatively low (such as Italy and Spain). This selection includes school systems with varying definitions of school age, compulsive schooling, and school finance schemes. Although the majority of funding remained at the local and regional level, most notably Sweden and England and Wales featured significant central government subsidies during the 1870s (Table 1). In this analysis, the main emphasis is on school acts from 1814 in Denmark to 1870 in England and Wales.

**Table 1.** Educational provision, organization, funding and enrolment rates.

[Insert Table 1 here!]

*Sources:* See Figure 1 and Lindert 2004; Westberg *et al.* 2019; Westberg 2017; Gijlswijk 2016, p. 374; Statens statistiske Bureau: Statistisk Aarbog (1896); Anuario Estadístico de España; Estadística General de Primera Enseñanza; Hoorn 1907, p. 217-230. *Note:* B/G indicates that the school act encompassed both boys and girls. <sup>(1)</sup>Girls, when possible, were to be taught in separate schools; <sup>(2)</sup>Villages with enough resources should also provide schooling for girls; <sup>(3)</sup>Local school districts to decide whether varying demands should be placed on boys and girls; <sup>(4)</sup>Until full proficiency in main school subjects; <sup>(5)</sup>Schooling should start at age 9 the latest. No regulation on the number of years to attend school; <sup>(6)</sup>No definition of the school age; <sup>(7)</sup>the municipalities covered about 97 percent of primary school expenditure, that leaves a maximum of 3 percent for the central government; <sup>(8)</sup>European Russia, <sup>(9)</sup>Sanctions noted in the Casati Law, but could not be enforce because they were absent from the penal law.

All samples of school acts obviously have their limitations, and the vast majority of European nineteenth century school acts are not included in this analysis. This concerns the additional school acts that were enacted in the countries under study, for example the Dutch school acts of 1878 and 1889 (Dekker *et al.* 2019), or the Falloux Law of 1859 and the Duruy Law of 1867 in France (Alix 2019). This also concerns school acts in other political entities, including for example the school act of 1808 of the Duchy of Warsaw, the school act of 1827 in Norway, and 1843 in Luxembourg. Since this article focuses on school acts that concerns entire states (often nation states), political entities that did not issue such laws during the nineteenth century (including Prussia) are not included in this analysis (for the development of school regulations and laws in Prussia, see Caruso and Töpper 2019). While the selection of landmark school acts for this article thus implies omissions, it nevertheless provides a foundation for further explorations into the history of school acts, their varying regulations of the provision, organization and funding of schooling, and its impact on educational expansion.



### The church, the municipality or a range of school organizations

This comparative analysis of the above-mentioned school acts show that the school acts defined the local organization of schooling differently. Although they all devoluted a lot of power to the local level, the local governing bodies that the school acts defined where of different kinds.

Firstly, one may distinguish between those school acts that adhered to the separation of church and state, stressed by Goldin and Katz (2003), and those that did not. In Denmark and Sweden, the decentralized school organization was tightly knit to the church and its parishes. In Sweden, the school districts (*skoldistrikt*) were a new administrative entity that was based on the existing parish organization. The school act of 1842 stated that each of Sweden's more than 2,300 parishes, either alone or in cooperation with another parish, should establish a school district governed by a school board (*skolstyrelse*) chaired by the vicar or his representative (Westberg 2019, p. 202–203). Although the school board was responsible for creating a budget and formulating a local education plan, all vital decisions regarding funding, appointments of teachers, and school building were made by the parish meeting, chaired by the vicar, where all taxable inhabitants of the parish could vote.

In Denmark, the five school acts of 1814 enacted a new local school organization with close ties to the church. In rural areas, local school boards (*skolekommissioner*) were created to organize schools in school districts (*skoledistrikt*), which should have a radius that allowed children to walk to school at a distance of no more than a quarter of a Danish mile (1.9 kilometers). The school board was chaired by the parish priest, reiterating the intimate link between schools and the church. The school boards were obligated to issue a school plan, to be approved by the Ministry for Justice, Church and Education (Larsen 2017, p. 12–13; Larsen 2019, p. 128).

In other countries, secularization of the local organization was accomplished by providing municipalities or communes with the main responsibility to organize schools. This was the case with the framework set by the Someruelos Act and the Montesino Regulation in Spain (1838), and the Casati Law of 1859 in Italy. In Italy, schooling was placed under the municipal councils in the municipalities (*communi*), of which there were 8,200 in the 1870s (Randerad 1993, p. 105). These councils were given the responsibility for providing schools in proportion to the needs of the population and the financial capacity of the municipality. First following the Daneo-Credaro reform of 1911, vital parts of the management of the schools were taken away from the municipal councils to the provincial school boards (*Consiglio scolastico provinciale*), who previously only had an advisory role, enabling them to take an active role in improving the municipal provision of schooling (Cappelli and Vasta 2020, p. 162, 165).

The Guizot Law of 1833 established what has been termed the first definition of an independent local school administration in France (Alix 2019, p. 152). According to this law, every commune was required to either maintain or establish a primary elementary school (Alix 2019, p. 150). The parish priests, who had previously been in charge of village schools, were instead merely given a position in the local inspection committee under the leadership of the mayor or his deputy, which included at least one leading member of the local community (Alix 2019, p. 151). Thus, the Guizot Law separated primary schools from the revenues, such as tithes, which they had previously received as part of the church, and they

were instead given the right to receive funds from taxes created following the French Revolution, including a land tax and a tax on commercial activities (Montalbo 2019, p. 5).

Unlike Goldin and Katz (2003) analysis of the US case, this review of school acts questions whether a secular organization of schooling was a virtue in Europe. In certain countries such as the Netherlands, with significant religious tensions, the separation of church and state in 1795 had certain political benefits. Nevertheless, it raised economic and organizational concerns following the school act of 1801 since this division meant that teachers could not combine their teaching with a job at the church, which led to increased cost for schools. In order to reduce this strain on local schools, the government again allowed teachers to combine teaching with church employment in 1802 (Gijlswijk 2016, p. 370).

Similar experiences from other countries indicates the challenges of providing secular authorities with the responsibility of schooling. In Italy, the problem was partly administrative. The municipalities were criticized for their failure to provide municipal services in general, which partly stemmed from an administrative inability to complete municipal budgets and to levy taxes (Randeraad 1993, 104–105). Fiscal problems were also a feature of the Spanish nineteenth century municipalities, which is an explanation to the slow and uneven development of literacy in Spain (Beltrán 2013, p. 497). In France, school inspectors complained about uneducated mayors lacking the local prestige of priests and were indifferent to the cause of schooling (Koepke 1995, p. 598).

In France, however, the municipalities cooperated with the church. Unlike Goldin (2001), François Guizot (1787-1874) argued that close cooperation with the church was key to success, and there is evidence that supports this argument. According to Koepke (1995), a majority of the priests accepted the new primary schools of the Guizot Law, and many were ardent supporters. School inspectors noted how some priests, rather than mayors, were the main promoters of education in their areas, and how mayors and priests sometimes worked together. For example, the inspector of the Sarthe department remarked that mayors worked hard to get schools funded, although they left the inspection and supervision to the priests (Koepke 1995, p. 599).

There are also examples of the church providing primary schooling with a strong organizational basis. In the Swedish case, being part of the parish organization stretching back to medieval times provided school districts with a long tradition and strong legitimacy to administer taxes and manage public goods. Enacted in order to organize and fund church buildings and priest salaries, the parishes' tasks had included upholding church discipline, settle certain legal matters, and organize poor relief, insurances, parsonages, schools, and other matters of common interest to the local community (Westberg 2014, p. 135–136). These parishes also had a long history of catering to the literacy of the population – as had already been stated clearly in the Church Law of 1686 – and the important role of the parish priests as the main, and sometime only, promotor of primary schools in rural parishes was widely recognized in the nineteenth century. As a result, the Swedish school districts had not only the legitimacy, but also the organizational strength to establish and maintain schools (Westberg 2019).

In addition to these varying relations between church and the school system, the school acts differed in terms of whether they identified one certain organizational entity as responsible

for schools, or whether the school acts created a school system based on several organizations. In Russia, the Education Statute of 1864 opted for a solution in which a wide range of local initiatives were supported by the state. The purpose of this was to retain central control over the content of education, while stimulating local funding (Eklof 1986, p. 55; Eklof 2019, p. 260). As a result, the Education Statute of 1864 gave economic control to the institution providing the funding, and the educational control to school boards at the district and provincial levels. The school boards were given the right to formally acknowledge new schools, identify sources for revenues, and supervise instruction, and consisted of two delegates representing the zemstvos (local administrative bodies dominated by nobility, see Eklof 1986, p. 58–60), and representatives from the Orthodox Church, the Ministry of Education, and other departments (Eklof 1986, p. 54). The main principal owners of primary schools in European Russia were the zemstvos and the church, but schools could also be run by villages, peasant communes, or higher administrative state levels such as the Ministry of Education and the Ministries of Interior, State Domains, Apanages and Mining (Brooks 1982, p. 249–250; Eklof 1986, p. 53).

Although this situation enabled a decentralized school system in which both religious and secular organization could take part, the Russian school system had an important feature that distinguished it from its West European counterparts. By making schooling everyone's (voluntary) responsibility, it also made schooling no one's (mandatory) responsibility. As a result, the number of schools run by the Orthodox Church dropped from over 24,000 in 1866 to slightly more than 4,000 in 1880 (Brooks 1982, p. 252). Zemstvos were given the right to provide schooling and the right to participate in local school boards, but the fact that they were not obliged to establish and maintain schools reduced the inclination of these bodies to provide necessary support to local schools. Dominated by local nobility, the zemstvos instead merely tended to provide additional funds to already established schools funded by peasant communities (Eklof 2019, p. 262. See also Eklof 1986, p. 60, 64).

A similar solution was implemented in England in 1870. Instead of requiring a certain organizational entity to maintain or establish school, the Elementary Education Act acknowledged the primary schools run by, for example, churches, religious groups, philanthropical ventures or local government school boards. The Elementary Education Act strengthened this emphasis on a plurality of organizers by being neutral in terms of religion and by providing additional state funding for schools run, for example, by philanthropic or religious organizations, which had to compete with schools established by the government (Mitch 2019, p. 306–308). Compared with the Russian Education Statute of 1864, however, there was one fundamental difference. The Education Act of 1870 included a mechanism that guaranteed schooling in areas where schools were lacking. In such areas, voluntary societies received six months' notice before the government established a school board to create new schools (Mitch 2019).

As these examples of how school acts constructed the local organization of school systems indicate, nineteenth-century school systems were not only decentralized to various degrees in terms of decision making, but also decentralized in various ways. In this section, I have indicated that there were at least three models of decentralization in nineteenth-century Europe, based on either the parish-organization, secular municipalities, or a diversity of organizations. Further research is of course required to determine whether these actually

were the three main organizational modes of European primary schooling, and what the function of them were. However, as indicated above, there are reasons to believe that church support, rather than the strict division between church and school, promoted educational growth in nineteenth century Europe.

### A basic rather than compulsory schooling

The school acts also provided varying definitions of the schooling that these local organizations were intended to provide. While nineteenth century school acts are commonly referred to as enacting compulsory schooling (e.g., Soysal and Strang 1989, p. 278; de Pleijt 2016, 112; Cvrček 2019, p. 371), the nature and extent of the schooling that the school acts prescribed varied. As evident from below, these definitions differed widely from what today is meant by the term, both in terms of the content and the amount of schooling.

A key feature of the nineteenth-century school acts was that they generally defined a provision of education that was modest both in comparison to twentieth-century primary schooling and the rather lofty aims of nineteenth century schooling. National school systems have, rightly so, been described as part of state formation processes, where schools were required to disseminate nationalist ideologies and establishing a national culture (Green 2000, p. 312). In England, the Education Act of 1870 was seen as mechanism to cope with the competition of the industrialized world (Goni 2013, p. 7; Mitch 2019). In France, the purpose of the Guizot Law was said to be to secure the constitutional monarchy, to develop intelligence, and to disseminate the light of knowledge (Alix 2019, p. 151). In the Batavian Republic, the early nineteenth-century school acts promoted new national values and a new unified system of spelling and grammar for the national language (Dekker *et al.* 2019, p. 95–96). In this respect, schooling has been described as a mechanism for defining the image of a nation and for creating a bond between each citizen and the country flag (Hobsbawm 1992, p. 91).

Despite such lofty ambitions, however, the learning objectives set by school acts were generally quite restrictive, focusing on religious knowledge, reading, writing, and arithmetic. In Denmark, the school act of 1814 for schools in rural areas and in markets towns was intended to educate good Christians, useful citizens, and loyal subjects to the Danish Crown. This was translated into a curriculum with an emphasis on religious knowledge that was complemented with teaching in reading, writing, and arithmetic. Subjects such as history and geography were not taught separately, but as part of the reading and writing instruction (Larsen 2019, p. 125–126). Similarly, the French Guizot Law of 1833 emphasized religious instruction, reading, writing, and calculation. Here, the elements of French language and the French system of weights and measures were also included (Alix 2019, p. 150–152). The curriculum legislated in Russia was similar. In the Education Statute of 1864, the comparatively ambitious curriculum in the drafts for the statute was restricted to Bible study, Russian language, reading, writing, arithmetic, and hymn singing. The latter was intended to strengthen parental interest in schools (Brooks 1982, p. 263; Eklof 2019, p. 259).

The restricted demands of the school acts were reinforced by the fact that they often allowed considerable local and regional variations in educational provision. An example was the Danish school acts of 1814. In Denmark, a total of five school acts were issued, in turn targeting rural regions, markets towns, the capital of Copenhagen, Jews, and the duchies of Schleswig and Holstein (Larsen 2019, p. 125). In Spain, the Montesino Regulation of 1838 distinguished between a complete and an incomplete curriculum. The former included teaching in the Catholic faith, reading, writing, arithmetic, and Spanish grammar (Mallorquí-Ruscalleda 2019, p. 177). The Swedish school act of 1842 made a similar distinction between a minimum level and above minimum level. The minimum level provided instruction in religious knowledge, reading, writing, arithmetic, and church singing, although the latter was only for those students with singing ability. In addition, the primary school curriculum could include history, geography, geometry, linear-drawing, natural history, and physical education. In 1847, however, only six percent of the school children received an education above the minimum level (Westberg 2019, p. 206–207, 211). In this respect, European school acts indicate that regional variations were not only due to regional variations in parental demand – and the distances between the intentions of the school act and the local realities often mentioned in the literature – but could actually be supported by the school acts themselves.

The limited learning objectives were mirrored in the restricted demands put on enrolment and attendance. UNESCO defines compulsory schooling as “a number of years or age span during which children are legally obliged to attend school” (UNESCO 2020), and compulsory schooling is often defined as a period of mandatory educational attendance. In the present article, enrolment refers to being enrolled or registered as a pupil, and attendance denotes the practice of actually attending school (A'Hearn and Vecchi 2017, p. 191).

An important feature of nineteenth-century school acts was that they did not necessarily make schooling compulsory in the UNESCO sense of the word. The 1814 school acts of Denmark came close to this definition of compulsory. They made schooling compulsory for both boys and girls with one exception: only parents who could provide their children with a private teacher were allowed to teach their children at home (Larsen 2019, p. 128). Most commonly, however, the definition of compulsory schooling was less strict. The Habsburg School Ordinance of 1774 enacted merely compulsory education, that is, all citizens were expected to reach a certain level of literacy. According to the Habsburg School Ordinance of 1774, all school-aged children should be educated, either in schools or in their homes (Viehhauser 2019, p. 31). School acts could also include a wide list of exceptions, reducing the compulsory nature of schooling. The Swedish school act of 1842 stated that all children should attend primary schools (*folkskolor*), but exempted children educated at home or attending grammar schools. The school act also noted that children with long school routes were not expected to attend school with the same frequency as other children (Westberg 2019, p. 205).

Apart from these various interpretations of the concept of compulsory schooling, the mandatory nature of schooling could in itself be constructed as a choice. In England and Wales, the Elementary Education Act of 1870 did not enact compulsory education, but allowed local school boards to pass such by-laws regarding school-aged children. Compulsory schooling was thereby merely introduced as an option for school boards. As a

result, school boards could implement regulations stating, for example, that children whose school routes exceeded three miles were not required to attend schools (Mitch 2019, p. 307).

Similar to the concept of compulsory schooling, the school acts' regulations on attendance were often vague and varied. Although schooling was rather compulsory in Denmark, the school act of 1814 did not require children to attend school each day. To accommodate the demands of rural society, school children in rural regions were only expected to attend school every other day, while schools in market towns were organized so that children could work outside of school hours (Larsen 2019, p. 125). In Switzerland, regional school acts also catered to the demands of agriculture. During winter, school weeks could consist of 30 hours, which were reduced to six hours per week in summers, when farm labor was more intensive (Boser *et al.* 2019, p. 77). In Sweden, the school act of 1842 did not state either the number of school days or school weeks, which led to significant variations in attendance and an increasingly widespread tradition of half-time schooling. Half-time schooling meant that children were only expected to attend school every other day, or every other week. Still in 1901, 51 percent of school aged children attended school half time (SCB 1974, Tab. 3.1).

Such vague regulations regarding compulsory schooling and attendance were generally matched by a lack of enforcement. In comparison to the US, where many states enacted school acts that included fines for violation of compulsory schooling (Clay *et al.* 2012, p. 8), the European school acts were less strict. In Switzerland, attendance was rarely enforced (Boser *et al.* 2019, p. 71), and in Sweden warnings were merely to be issued when parents did not adhere to the regulations (SFS 1842:19, § 9). In Habsburg, attendance was to be enforced, but neither methods of enforcement nor penalties was noted in the General School Ordinance of 1774 (Cvrček 2020, p. 29), and in England, the Elementary Education Act of 1870 noted that school boards "if they think fit" could appoint an officer to enforce school attendance (The Elementary Education Act (1870) § 36).

There were instances of school acts that were stricter in some respects. Danish school boards were expected to impose fines on the parents of children who missed school, but since these boards partly consisted of parents, some boards did not distribute fines, some imposed fines at the lowest possible rate, and others merely ignored the issue (Larsen 2017, p. 14). In the Netherlands, schooling was enforced only on the poor, who could otherwise be refused poor relief (Dekker *et al.* 2019, p. 104). In Italy, the Casati Law stated that sanctions should be taken towards parents and schools that did not act in keeping with the law. However, since such regulations were not included in the Italian penal code until 1877, no sanctions were in place (Cappelli 2019, p. 243; Cappelli and Vasta 2020, p. 162).

The compulsory nature of enrolment and attendance was also affected by how school acts defined school children, that is, the children expected to attend school. An important aspect of this was gender (see Table 1): was schools supposed to cater to both boys and girls? In this regard, the regulations varied significantly. Enrolment of both boys and girls, for example, was stated by the school acts of 1814 in Denmark, the school act of 1842 in Sweden, and the Education Act of 1870 (Armytage 1970). In Sweden, however, the school act noted that the local school boards were to decide whether varying demands should be placed on boys and girls (Westberg 2019, p. 206). The Casati Law of 1859 did not exclude

girls, but did not promote female schooling (Cappelli 2019, p. 232). There were also school acts that were less gender-neutral in terms of enrolment. In France, the Guizot Law of 1833 was primarily intended to promote the schooling of boys (Alix 2019, p. 152), and did first include girls in 1836 (Price 1987, p. 318). In Spain, only villages with enough resources were expected to provide schooling for girls (Mallorquí-Ruscalleda 2019, p. 176).

These guidelines also concerned age (Table 1). In the school acts, the definitions of school age or the age spans for children expected to attend school differed both in range and specification. In comparison to late twentieth century definitions of school age, school acts often remained comparatively vague. In the Netherlands, the school act of 1806 defined the school age of primary schools as “youth of all ages” (Hoorn 1907, p. 217), and in France, the Guizot Law of 1833 did not provide a definition of school age. Other school acts merely provided a starting age. The Stapfer school act (1798) for the Helvetic Republic noted that schooling should start at the age of six and end when sufficient proficiency in the main school subjects was reached (Boser *et al.* 2019). In Sweden, the school act of 1842 stated that schooling should start at nine years of age the latest, and did not stipulate a minimum number of school years. First in 1882, 7–14 was defined as the school age (Westberg 2019). In England and Wales, the Elementary Education Act of 1870 merely noted that local school districts should define school ages as somewhere between 5 and 12 (Mitch 2019, p. 306), and in Russia neither school age nor the number of school years were defined (Eklof 1986, p. 54). When school acts did not include a defined school age, the concept of compulsory schooling is obviously difficult to apply.

Some school acts nevertheless provided more restricted definitions of school age. Some school acts defined a short school-age, such as the Italian Casati Law of 1859, which enacted schooling for children aged 6–8 (Cappelli 2019), and the Spanish Montesino Regulation from 1838, which indicated 6–9 as the school age (Mallorquí-Ruscalleda 2019). Some school acts were more ambitious in this respect, such as the General School Ordinance of 1774 describing 6–12 as the school age (Viehhauser 2019), or the school acts of Denmark than in 1814 defined school age as from 6 or 7 to 13 or 14 (Larsen 2019). As in the case of the Danish school acts, the General School Ordinance of 1774 did include the ambiguities that often marked nineteenth century school acts: it both denoted the school starting age as the sixth year of life and the age of six, and both included formulations on 6 or 7 years of attendance, and the voluntary option to stay in school beyond the age of 12 (Cvrček 2020, p. 29–30).

To conclude, the European school acts were generally marked by limited learning objectives, varying perceptions of the compulsory nature of schooling, varying expectations on attendance and varying and a general lack of enforcement, and varying inclusiveness in terms of age and gender. Taken together, nineteenth century school acts thus promoted schooling that most fittingly is described as *basic*, rather than *compulsory* in the UNESCO meaning of the word. In addition, these generally low demands indicate that the regional variations of nineteenth century schooling were not only dependent on determinants at the regional and local level, but were also facilitated by nineteenth-century school acts. An interpretation of these varying definitions of compulsory education is that they provided the regulations and guidelines fitting for a decentralized school system that allowed school districts with high demand for education to invest in schooling accordingly, while allowing

more modest development in other school districts. Notably, several school acts encouraged a school system with high levels of enrolment – in the sense that children were registered at school – and low levels of attendance, complemented by teaching at a basic level. In other words, a limited amount of teaching for a large proportion of school-age children.

## School acts and the diversity of school revenues

The basic and generally non-compulsory schooling that these school acts defined, based on the church organization, municipalities or several kinds of organization, featured a decentralized system of school funding, where the main burden of the school system fell on the local level to varying degrees. As indicated by Table 1, central governments often provided between 0 and 10 percent of primary school funding in the latter half of the nineteenth century, the rest being shared between local level and at times regional levels of schooling.

The literature on nineteenth century schooling has discussed the varying functions of such decentralized funding systems, and examined the roles of public funding, local taxation and central government grants (Mitch 1986; Lindert 2004; Cappelli and Vasta 2020). In the case of the US, Goldin and Katz (2003) has stressed the significance of free public schooling, public funding, local taxation, and property taxes.

When examining European school acts, the most striking feature is the diversity of revenues. The Guizot Law of 1833 presented French municipalities with the opportunities to use various taxes, including the four created after the French revolution. These include a land tax, a so-called *patente* tax on commercial revenues, and a personal property tax on resources other than land and commercial activities. In addition, municipalities could use indirect taxes on products sold in the municipalities, such as salt and beverages. For special purposes, municipalities could also add additional cents per francs paid in taxes for other purposes (Montalbo 2019, p. 5).

This diversity of revenues also marked the school systems of Denmark and Russia. In Russia, schools sponsored by the *zemstvos* received funding from a range of sources. In addition to *zemstvo* support, this included funding from villages, churches, philanthropic organizations, private individuals, school fees, and central government (Eklof 1984, p. 568). In addition to land taxes, which was the main income of *zemstvos*, their revenues also included sources such as duties from patents and levies from taverns, turnpike traffic, and commercial entities (Eklof 1986, p. 80; Eklof 1984, p. 568–569). A similar range of revenues was indicated in Denmark. The school act of 1814 noted revenues that included taxes, a fee from the church at the amount that the church spends on church light (church light money, *kirke-lysepenge*), offertory collected at two Sunday services, voluntary gifts, a tax based on church tithes, and fines for those who violated mandatory school attendance (Danmarkshistorien 2020; Larsen 2019).

In addition to this diversity, European nineteenth-century school funding shared some notable features. In contrast to the US, where free schooling was offered according to Goldin and Katz (2003), European school acts most often either denoted or allowed for school fees (Table 1), at times with exceptions for poor children which was the case for England and



Sweden (The Elementary Education Act 1870 § 17; Westberg 2017 p. 115–16). While being a significant source of income in mind-nineteenth century Netherlands (Gijlswijk 2016, p. 374) and England (Mitch 1986, p. 372), fees remained of little importance in Sweden (Westberg 2017, p. 116). For various reasons, school fees were abolished in the latter half of the nineteenth century in 1881 in France, 1883 in Sweden, and 1893 in England (Lindert 2004, p. 112; Westberg 2017, p. 116; Mitch 2019, p. 303). While mainly publicly funded, nineteenth century schooling was thus often neither compulsory nor entirely free for pupils and their parents.

Several school systems relied, to varying degrees, on property taxes. Land and assets were taxed to fund the primary schools after the school act of 1814 in Denmark (Larsen 2019), and local property taxes were the economic basis of the English school boards created by the Elementary Education Act of 1870 (Mitch 2019). Land and property taxes were also a significant revenue source elsewhere. In France, local property taxes were estimated at half of the public schools revenues in 1870 (Vliet and Smyth 1982, p. 96); in Russia, land taxes provided *zemstvos* with approximately 75 percent of their revenues in the 1860s (Eklof, 1986, 80; Eklof, 1984, p. 568-569).

In this diversity of revenue streams, in-kind resources at times played an important role in school funding. Evidence of teachers receiving in-kind salaries have been gathered from Denmark, France, Habsburg, Russia, Scotland, and Spain, including housing, grains, cow fodder, fuel, milk, wine, bread, meat, and land plots (Table 2). Around the year 1800, 38 percent of Swiss teacher salaries were in-kind in the form of grains, firewood, wine, etc. (Brühwiler 2012), while in 1865, 19.9 percent of the revenues for teacher salaries was provided in-kind by towns and villages in the Habsburg province of Styria in the border-lands between present-day Austria and Slovenia (Cvrček and Zajicek 2019, Tab. 2).

The role of in-kind items were at times indicated by the school acts. In Denmark, the school act of 1814 for rural regions provided guidelines for teacher salaries with a significant share of in-kind items. These included six barrels of rye and 10 barrels of barley. In addition, teachers were provided with hay, straw, or peat to feed the teachers' cattle (estimated at two cows and six sheep), and a small land plot (Larsen 2019, p. 129–130). In Sweden, the school act of 1842 stipulated a minimum wage that included eight barrels of grains, housing, fuel, summer grazing and winter fodder for a cow, and, if possible, a land plot (Westberg 2019, p. 204).

**Table 2.** In-kind items in nineteenth century teacher salaries.

Country	Items mentioned in research literature	Period
Denmark	housing, cow fodder, fuel, grains	1810s
France	milk, butter, eggs, grain, lodging, a garden, fuel	1850s
Habsburg	grains, meat, salt, wood, butter, eggs	19th c.
Russia	grains	1860s, 1870s
Scotland	housing, garden, fuel, cow's grass, garden	1840s
Spain	landplot, lodging, meals	mid 19th c.
Sweden	housing, grains, fuel, cow fodder, land plot	1840s

Switzerland grains, firewood, bread, salt, salmon, 1790s  
wine

*Sources:* See references in Westberg 2018, p. 124 and Cvrček 2020, p. 147; San Román Gago 2000, p. 588.

As mentioned above, there was also a varying reliance on central government grants (Table 1). In some countries, school acts did not enact central government funding. In the Netherlands, central government funding remained marginal up till the 1870s (Giljsvijk 2016, p. 375). In Italy, the Coppino Law of 1877 stated that municipalities could apply for state funding, but state subsidies remained marginal during the nineteenth century in Italy (Cappelli 2019, p. 237). In other countries, state funding provided schools with more significant resources, ranging from 13.7 percent of the revenues in France (1870), 17.3 percent in England and Wales (1870), to 29 percent in Sweden (1874) and 42.5 percent in Belgium (1869) (Lindert 2004, p. 116–117; Westberg 2017, p. 6).

To be sure, such an overview of local taxes, fees, in-kind resources and central government grants indicate the importance of qualifying what is meant by public funding and taxes in the history of nineteenth century schooling. Although it has been stated that schooling rests on dollars and cents (Gidney and Millar 2012), the school acts of 1814 (Denmark) and 1842 (Sweden) offers evidence that promote further exploration of non-monetary dimensions of nineteenth century school funding. In addition, such an overview raises questions about the role that the diversity of revenues played. In relation to modern portfolio theory in financial economics, diversification has been linked to improved financial management and increased revenue stability of local governments (Afonso 2013, p. 652-653), but whether these effects may be identified in nineteenth century schooling has not been determined.

## Distributional conflicts

In addition to a diversity of revenues, the school funding systems defined by these European school acts was marked by the severe inequalities of nineteenth century Europe. Despite providing local organizations with the final say in school funding, none of the school acts under study seems to have been based on the egalitarian principles that marked the U.S. school system according to Goldin and Katz (2003). These were principles that “held the promise of equality of opportunity and a common education for all U.S. children” (Goldin and Katz 2003, p. 1).

As is evident from above, the primary schooling envisaged by the school acts was basic at best, and stood in sharp contrast to the comparatively well-funded secondary education, which, in Spain and Italy, for example, often enjoyed more generous funding from the central government (Cappelli 2019; Mallorquí-Ruscalleda 2019). In Russia (1877), approximately 75 percent of all *zemstvo* schooling funds were spent on secondary education (Eklof 1984, p. 569). In Italy, the central government spent 100 times more on secondary schools than primary schools, counted per pupil (Cappelli 2019, p. 234). Even in a primary school system with high enrolments, total school spending per enrolled school child was 11 times higher in Swedish grammar schools than in primary schools in 1882 (BiSOS P 1882).

In addition, the decentralized school organization defined by the school acts did not necessarily support the popular voice. Instead, school acts could devise mechanisms to

guarantee the political influence of the local elite. In Denmark, rural school boards were expected to include school patrons (*skolepatroner*), who were men of protestant faith above a certain level of wealth (Larsen, 2017, p. 12–13; Danmarkshistorien 2020); in England, elite influence was guaranteed by setting an annual minimum taxation limit or a minimum of landownership to be eligible for positions in school boards (Goni 2013, p. 8). In Italy, municipal councils were selected by votes cast in an electoral system with suffrage limited to those with a certain taxable salary, a necessary level of literacy, or those having a job with a certain professional status, such as professors and government employees (Cappelli, 2016, p. 317). In Russia, the elections for the *zemstvos* was structured according to a set of rules that meant they were generally dominated by local landed nobility, despite the fact that peasants entailed 85 percent of the population in European Russia (Nafziger 2011, p. 405; Eklof 2019, p. 262).

In this context, there are evidence indicating that school funding was based on distributional conflicts rather than egalitarian principles. The implementation of property taxes is an excellent example of this. In the US context, the benefits of property taxes have been stressed. Goldin and Katz (2003) noted the positive feedback mechanism in which the quality of the school system raised the house prices, which in turn raised school district revenues. Property taxes have also been assumed to ensure the autonomy of school administration, and to provide a more stable basis for schooling in comparison with, for example, taxes on income or sales (Mitch 2004, p. 280).

In the European context, property taxes were used in conflicts over resource allocation. At times, they could be used by large landowners to reduce their tax burdens. In Italy, the local municipalities were allowed to fund their activities using taxes on land and property, and an income tax titled family tax (Cappelli 2016, p. 319); this solution allowed municipalities to choose the extent to which schooling should be funded by the propertied population. As A'Hearn and Vecchi (2017) has shown, the tendency to tax land was far greater in the north of Italy than in the south. Land taxes provided similar opportunities for Russian elites. Until the 1890s, the Russian nobility was allowed to assess the quality and size of their lands themselves, which meant that a lot of gentry land remained in practice untaxed, and that taxes were much higher for peasants than for the gentry (Eklof 1986, p. 80; Eklof 1984, p. 568–569).

However, in other funding systems property taxes provided school systems with benefits in a society marked by severe inequalities. In England, the obligation of school boards to establish schools where those were lacking and covering any deficiencies in their school funds with local property taxes (so-called rates) had certain benefits. This school funding design provided school boards with a limited but stable source of income, and was also a political compromise that, according to Norman Morris (1972), made the Education Act of 1870 possible to implement.

A similarly stable financial basis for primary schooling was provided by the school act of 1842 in Sweden. In this case, distributional conflicts between nobility, clergy and farmers – openly expressed in the parliamentary debate – resulted in a school system primarily built on taxation of Swedish farmers, which in 1870 comprised half of rural households (Gadd 2005, p. 51, 67). The school act suggested that the costs for salaries and other current expenditure could be covered by revenues such as a per capita tax, a general tax (designed by the school district), or school fees. Poverty-stricken school districts could apply for state subsidies, which from 1845 onwards were complemented with a general subsidy based on school

district population size. While school fees remained of lesser importance, school districts were funded with a wide range of taxes that, in the first years of the school act, often targeted either individuals or households, and were thereby regressive, taking a larger part of the income from low earners than high earners (Westberg 2017, ch. 4).

Another example of how educational expenditure was distributed was the school funding system created in the Habsburg Empire by the institution of school patronage (*Schulpatronat*), introduced in 1787 and lasting to the 1860s. This system was built on existing institutions of parish or church patronage, and meant that those who had previously been responsible for funding the local church (local nobility, a religious order, an independent fund) were also partly responsible for funding local schools. This included school building, school maintenance, teaching aids, and co-funding of new classrooms. The local villages, towns, and parishes were to provide the teacher salary (Cvrček and Zajicek 2019, p. 375–377; Cvrček 2020, p. 89).

Although this system laid the main burden of running costs on locals, it nevertheless secured a certain economic support from the elite making landed aristocracy into an important sponsor of mass schooling (Cvrček 2020, p. 89) that actually promoted schooling. Next to instances when the central government was the school patron, areas in which feudal lords were school patrons were the most generous in terms of school spending, followed by municipal patrons and religious orders (Cvrček and Zajicek 2019, p. 396). As Cvrček and Zajicek (2019) argued, this might be explained by the fact that, when expanding enrolments, municipalities did not have to pay for both increased teacher salaries and investments in larger school buildings.

As these examples illustrate, school funding could be used in various ways to distribute the burden of mass schooling. In contrast to Golding and Katz (2003), these examples of European school systems indicate that property taxes were not necessarily a virtue, and that egalitarianism was not a main feature of nineteenth-century European school acts. Instead, I have argued that distributional conflicts were fundamental in these contexts, and that property taxes, taxes targeting households and the institution of school patronage could be used both to secure necessary funding, but also for social groups to reduce the burden of school finance. In this context, I would suggest that school acts which promoted educational growth did so not because they were egalitarian, but because they supported institutions that could manage and thus secure necessary funding for primary schools in an unequal context.

## Conclusion

Complementing studies on the determinants of schooling, addressing the impact of the distribution of fiscal capacity, political voice, level of industrialization, or landownership, this article has focused on the institutional features of nineteenth-century schooling. Based on the analysis of ten school acts, I have argued that limited learning objectives, non-compulsory schooling, three types of organizational and financial decentralization, a diversity of revenues and distributional conflicts were main features of nineteenth-century European school systems. Partly in contrast to Goldin and Katz's (2001) description of the virtues of US schools – including public funding, gender neutrality, and separation of church and state – I have proposed that inclusiveness in terms of age and gender, church support,

and mechanisms to distribute school spending across institutions or social groups may be listed as virtues that promoted educational growth in the European setting.

By providing such an initial overview of the institutional arrangements of nineteenth-century schooling, this article indicates the need for more nuanced terminology when examining nineteenth-century schooling. Not all decentralized organizations of schooling provided the same opportunities for educational expansion, and quite different realities may hide under labels such as public funding, decentralization and compulsory schooling. In this respect, this article proposes that it might be useful to employ a typology that discerns between three kinds of local school organization: secular local organizations of schooling, local school organization based on the church, and school systems based on a wide range of local school organizations. Based on the overview presented in this article, I also propose that nineteenth century schooling should be denoted as *basic*, instead of the commonly used term *compulsory*: the varying demands on enrolment and attendance, and the general lack of enforcement, indicates a system of schooling that indeed was basic rather than compulsory.

As a result, this article indicates that the scholarly debate on European school systems might need another focus than the debate concerning the US school system. Instead of centering the discussion around free public funding, local control, property taxes and school district competition, this analysis of school acts indicate the importance of clarifying the differences between municipalities, parishes and zemstvos, and to examine the diversity of school revenues beyond distinctions between central and local, and between public and private. As evident just from a quick glance at school acts, European school funding was a rather complicated matter that requires an understanding the function of not only property taxes, but a wide diverse set of resource allocation systems that included taxes, school fees and institutions such as common lands and school patronage. Unlike US schooling, as portrayed by Goldin and Katz, the European school acts promoted schooling that was mainly publicly funded, but often was not entirely free for children and their parents. The sources of school funding also seem to have had varied roles in Europe. In contrast to the United states, where property taxes provided schooling with a firm foundation, property in Europe was also used by landed elites to restrict their support of mass schooling, and thus reduce the funds available for schooling.

In relation to a broader field of research on schooling, this article stresses the importance of addressing not only more general institutions of society that relates to industrialization, serfdom, landownership concentration or political voice, but also examines the institutional framework of schools and the relationships between school enrolment and the educational provision, organization and funding schemes enacted by the school acts (see Table 1). In this respect, Tomáš Cvrček's work on the institution of school patronage (2019; 2020) is particularly inspiring. Apart from further estimations of the impact of, for example, changing regulations of school age or attendance, such studies could address the introduction of a new local or regional school organization, or school tax reforms. Such quantitative studies could also form the basis for historical local level case studies that further explores the function of such phenomena in regions with varying levels of enrolment, landownership concentration or political voice.

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**Table 1.**

School Act	Year	Political entity	Regulations of educational provision			School funding		Organization
			Gender	School age	Enforcement of attendance	Central level (%)	School fees	Local governing body
General School Ordinance	1774	Habsburg Empire	B/G <sup>(1)</sup>	6–12	no penalties	-	Yes	monasteries, manorial lords, towns, villages etc.
Stapfer-draft school act	1798	Helvetic Republic	B/G	6– <sup>(4)</sup>	-	0.0 (c. 1870)	No	municipalities
The School Act of 1806	1806	The Batavian Republic	B/G	none <sup>(6)</sup>	refusal of poor relief	9.3 (1855)	Yes	public and private organizations
The School Acts of 1814	1814	Kingdom of Denmark	B/G	6/7–13/14	finest	9.1 (1891–92)	No	church based school districts
The Guizot Law	1833	Kingdom of France	B	none <sup>(6)</sup>	no penalties	13.7 (1870)	Yes	municipalities
The Someruelos Act and the Montesino Regulation	1838	Kingdom of Spain	B <sup>(2)</sup>	6–9	no penalties	3 (c. 1900) <sup>(7)</sup>	Yes	municipalities
The School Act of 1842	1842	Kingdom of Sweden	B/G <sup>(3)</sup>	9– <sup>(5)</sup>	warnings	29 (1874)	Yes	church based school districts
The Casati Law	1859	Kingdom of Italy	B/G	6–8	No sanctions in penal code <sup>(9)</sup>	1 (1870)	No	municipalities
The 1864 Education Statute	1864	Russian Empire	B/G	none <sup>(6)</sup>	no penalties	11.3 (1879) <sup>(8)</sup>	Yes	state, zemstvos, local initiatives etc.
The Elementary Education Act	1870	England and Wales	B/G	5–12	optional	35.5 (1874–75)	Yes	voluntary organizations or public school board