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Where Are the Goalposts Now? Christian Theology on Sexuality in a Changing World

Janet Epp Buckingham

In the last 20 years, as LGBTQ rights have greatly advanced, claims to religious freedom that conflict with these rights have been eroded. This paper considers the case of Trinity Western University, which was denied the right to establish a law school by two provincial law associations and the Supreme Court of Canada, and the implications for Christian behaviour in cultures that have shifted away from traditional views of human sexuality.

In light of the rapid change in legal rights and social acceptance of LGBTQ persons in Canada, what is the place of traditional Christian theology on human sexuality? The sexual revolution of the 1960s did not place relentless pressure to conform on religious institutions, but the LGBTQ sexual revolution of the early 2000s has done so. Many Christian institutions have been legally challenged if they refuse to accept the new normal of same-sex marriage. Where are the goalposts? Is there still respect for traditional Christian theology on marriage and sexuality?

Trinity Western University (TWU) is a Christian university located near Vancouver, British Columbia, Canada. In the 1990s, the university developed an education programme and sought accreditation. It was denied on the basis of its code of conduct, which prohibited homosexual intimacy. The university challenged this denial in court and won at all levels, including the Supreme Court of Canada in 2001.[1]

In June 2012, TWU submitted a law school proposal for accreditation. The proposal was very controversial because the school's community covenant, although it had undergone some revision since 2001, still required staff, faculty and students to agree to refrain from sexual intimacy outside heterosexual marriage. The law school proposal was rejected. TWU brought legal challenges and ultimately lost at the Supreme Court of Canada in 2018.[2] Today, there is a School of Education at TWU but no School of Law.

How could there be such a radical shift in 17 years that the Supreme Court of Canada would reverse itself? TWU placed heavy reliance on the previous prec-

1 *Trinity Western University v. British Columbia College of Teachers*, [2001] 1 SCR 772 (Supreme Court of Canada).

2 *Law Society of British Columbia v. Trinity Western University*, [2018] 2 SCR 293; *Trinity Western University v. Law Society of Upper Canada*, [2018] 2 SCR 453 (Supreme Court of Canada).

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edent and thought that lawyers and courts would respect a decision by the highest court in the land. It was bitterly disappointing that the Supreme Court itself did not uphold its previous decision.

During the education case, TWU's faculty and students solidly supported the university and its position. This was not the situation in the law school case. Alumni were divided. Some faculty spoke publicly against the university's position.

In light of social pressure and divisions in evangelical Christianity, is there still a place for traditional beliefs and practices with respect to sexuality and marriage? This paper will explicate the experience of TWU through the eyes of a professor in the midst of it. I conclude with some thoughts on whether orthodox theology on sexuality will be tolerated in Western countries such as Canada and how we can respond.

The context

Theological context

Human sexuality is part of biblical theology. In the creation narrative, God created male and female humans to have sexual intimacy and procreate (Gen 1:27–28). In Old Testament law, homosexual intimacy is condemned (Lev 18:22). In the gospels, Jesus affirms a high view of marriage and condemns divorce (Mt 10:3–9) but does not address homosexuality directly. Paul introduces a high view of celibacy as a preferred alternative to marriage (1 Cor 6:12–20; 7:7) and condemns both sexual intimacy outside marriage and same-sex intimacy (Rom 1:26–27).

In recent decades, some Christians and Christian denominations have questioned the received orthodoxy about sexual intimacy and marriage. Particularly since the sexual revolution of the 1960s, some denominations have accepted divorce and remarriage, premarital sex and common-law unions. With the advance of public policy changes relating to LGBTQ rights, particularly same-sex marriage, mainline Christian denominations in Canada (including the United Church of Canada and the Anglican Church) have accepted and even solemnized same-sex marriages. Denominations and churches have split over this issue, and evangelicals have wrestled with it as well, with some prominent evangelical leaders endorsing same-sex marriage.[3]

Younger generations of evangelicals are much more accepting of LGBTQ rights and same-sex marriage than older generations.[4] It is therefore perhaps not surprising that support for TWU's code of conduct was much different in 2001 than in 2018. During the legal cases over the School of Education, the faculty and students firmly and publicly supported the university administration. During the law school cases, some faculty members publicly opposed the code of conduct's provisions on sexuality. A 'One TWU' group formed to give a voice to LGBTQ alumni and allies who disagreed with the university's position.

3 See Douglas Todd, 'TWU President Says "Society Has Moved the Yardsticks" on Same-Sex Relationships', *Vancouver Sun*, 20 June 2014, www.vancouversun.com/life/Douglas+Todd+president+says+society+moved+yardsticks+same+relationships/9959491/story.html.

4 Alex Vandermaas-Peeler, Daniel Cox, Molly Fisch-Friedman, Rob Griffin and Robert P. Jones, 'Emerging Consensus on LGBT Issues: Findings from the 2017 American Values Atlas', 1 May 2018, https://www.prri.org/research/emerging-consensus-on-lgbt-issues-findings-from-the-2017-american-values-atlas/.

Legal context

Canada did not have a constitutional bill of rights until 1982. In that year, the Canadian Charter of Rights and Freedoms[5] came into force, with the exception of the provision on equality, which took effect in 1985. It requires government to respect the rights and freedoms of Canadians.

As expected, a barrage of litigation followed, to determine if courts would take a broad and liberal interpretation of the Charter. They did. The Charter protects religious freedom in section 2(a) and requires equal treatment without discrimination on the basis of religion in section 15. The rights and freedoms guaranteed in the Charter are subject to a limitation clause, in section 1, which allows the government to violate Charter rights in certain circumstances.

Although the equality clause in section 15 does not specifically protect sexual orientation, the enumerated list of attributes where discrimination is prohibited is open-ended. The first case considering LGBTQ equality rights was heard in 1995. The Canadian government conceded that sexual orientation was an 'analogous ground' of discrimination and so essentially read it into the Charter.

In that first legal case, *Egan v. Canada*, the Supreme Court of Canada specifically affirmed the heterosexual definition of marriage:

> Suffice it to say that marriage has from time immemorial been firmly grounded in our legal tradition, one that is itself a reflection of long-standing philosophical and religious traditions. But its ultimate *raison d'être* transcends all of these and is firmly anchored in the biological and social realities that heterosexual couples have the unique ability to procreate, that most children are the product of these relationships, and that they are generally cared for and nurtured by those who live in that relationship. In this sense, marriage is by nature heterosexual. It would be possible to legally define marriage to include homosexual couples, but this would not change the biological and social realities that underlie the traditional marriage.[6]

In 1999, two momentous events concerning LGBTQ rights occurred. The first was a decision from the Supreme Court of Canada[7] that same-sex couples should have the same rights, obligations and benefits as opposite-sex common-law couples. This decision required the revision of hundreds of pieces of legislation. In response to this ruling, the Canadian House of Commons passed a resolution affirming the opposite-sex definition of marriage.[8]

In the following year, three legal challenges were launched across Canada to challenge the opposite-sex definition of marriage. In Canada, the definition of marriage is the national government's responsibility but solemnization of marriage is a provincial government responsibility. The national government did not have legislation defining marriage but relied on the common-law definition dat-

5 Canadian Charter of Rights and Freedoms, section 7, part 1 of the Constitution Act, 1982, being Schedule B to the Canada Act of 1982, chapter 11.

6 *Egan v. Canada*, [1995] 2 SCR 513 (Supreme Court of Canada), 536.

7 *M v. H*, [1999] 2 SCR 3 (Supreme Court of Canada).

8 House of Commons Journals, No. 240, 8 June 1999, https://www.ourcommons.ca/DocumentViewer/en/36-1/house/sitting-240/journals.

ing back to 1866 from Britain.[9] As the legal challenges were heard and appealed, courts in several provinces redefined marriage to 'between two persons'. They reasoned that the definition was discriminatory and contrary to the Charter of Rights and that a common-law definition could be revised by the courts.

The national government ultimately passed legislation to redefine marriage in 2005.[10] During the hearing process prior to the passage of this legislation, religious leaders expressed concern that changing the definition of marriage would lead to discrimination against and marginalization of those who objected to the new definition on religious grounds. The legislation was amended to add the following two Preambles that recognize religious objections to same-sex marriage:

> WHEREAS nothing in this Act affects the guarantee of freedom of conscience and religion and, in particular, the freedom of members of religious groups to hold and declare their religious beliefs and the freedom of officials of religious groups to refuse to perform marriages that are not in accordance with their religious beliefs;
>
> WHEREAS it is not against the public interest to hold and publicly express diverse views on marriage;

In addition, section 3.1 was added, containing the following guarantee:

> For greater certainty, no person or organization shall be deprived of any benefit, or be subject to any obligation or sanction, under any law of the Parliament of Canada solely by reason of their exercise, in respect of marriage between persons of the same sex, of the freedom of conscience and religion guaranteed under the *Canadian Charter of Rights and Freedoms* or the expression of their beliefs in respect of marriage as the union of a man and woman to the exclusion of all others based on that guaranteed freedom.

In 2005, there was a clear consensus that same-sex marriage and religious beliefs about human sexuality could co-exist in Canada.

Trinity Western University's law school proposal

The university

TWU was founded as a Christian junior college in 1962 and gained full university accreditation in 1984. It is primarily a liberal arts university but also has several professional programmes, including nursing, education and counselling psychology.

Like many Christian universities, TWU has a code of conduct that sets forth behavioural expectations. There are several rationales for such a code of conduct. First, the university is a religious community, in which it is helpful to have common expectations. Second, Christian universities see themselves as standing in the place of parents for students attending. Asking all students to adhere to Christian behaviours reinforces those behaviours and enhances cementing Christian faith in students.[11]

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9 *Hyde v. Hyde and Woodmansee*, [L.R.] 1 P. & D. 130 (English Court of Probate and Divorce).

10 Civil Marriage Act, S.C. 2005, chapter 33.

11 Gerald A. Longjohn, Jr., *By the Book: Spiritual Formation and Conduct Codes at Selected Chris-*

The TWU code of conduct is quite comprehensive and covers issues from human dignity to plagiarism. It has always made reference to expectations related to human sexuality, including a requirement to refrain from sexual intimacy outside marriage. Prior to 2009, the code of conduct stated the sinfulness of homosexual intimacy. In 2009 a more positive statement was adopted. It required abstinence from sexual activity that would violate the sanctity of marriage, defined as between one man and one woman. All aspects of the code of conduct that address Christian behavioural standards are referenced in Scripture.

The pre-2009 version of the code of conduct was at issue in the Supreme Court of Canada's 2001 ruling, addressing a proposed School of Education. TWU had a teacher training programme but was seeking full accreditation so that education students could complete all requirements at the university rather than having a local public university supervise their final year. The British Columbia College of Teachers denied accreditation on the basis of the code of conduct, which prohibited 'activities that are biblically condemned' including 'homosexuality'. The College of Teachers maintained that teachers graduating from such a programme would discriminate against LGBTQ students.

TWU brought a legal challenge against the College of Teachers' decision on the basis that it violated religious freedom. The Supreme Court of Canada ruled in favour of the university by 8 to 1. The essence of its rationale is encapsulated in this statement:

> TWU is not for everybody; it is designed to address the needs of people who share a number of religious convictions. That said, the admissions policy of TWU alone is not in itself sufficient to establish discrimination as it is understood in our s. 15 jurisprudence. It is important to note that this is a private institution that is exempted, in part, from the British Columbia human rights legislation and to which the Charter does not apply. To state that the voluntary adoption of a code of conduct based on a person's own religious beliefs, in a private institution, is sufficient to engage s. 15 would be inconsistent with freedom of conscience and religion, which co-exist with the right to equality.[12]

In 2007, the President of Trinity Western University invited two professors to begin to develop a proposal for a law school. These two professors, Kevin Sawatsky, dean of the School of Business, and Janet Epp Buckingham, director of the Laurentian Leadership Centre, are both lawyers and had expressed prior interest in this project. The two made site visits to several US Christian law schools and convened a blue-ribbon panel of legal experts to consult on the direction for this proposal.

In 2007, it was reasonable that TWU would not consider its code of conduct an impediment to the accreditation of a law school. It had a strong Supreme Court of Canada precedent. The legislation redefining marriage made it clear that there was room for traditional religious beliefs and practices about marriage in Canadian society. When the code of conduct was revised to use language that did not directly condemn homosexuality, any reasons for concern seemed to have been reduced further.

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tian Universities (EdD dissertation, Olivet Nazarene University), 2013, https://digitalcommons.olivet.edu/cgi/viewcontent.cgi?article=1056&context=edd_diss.

12 *TWU v. British Columbia College of Teachers*, para. 25.

The approval process

As of 2007, no new law school had been approved in Canada for over 30 years. There was therefore no process for law school approvals. Another Canadian university signalled its interest in establishing a new law school that year, so the Federation of Law Societies of Canada began developing criteria and procedures for new law school approvals.[13] The Federation is the umbrella association of provincial law societies, which are the governing bodies for the profession of law in Canada. In August 2011, the Federation released the criteria and process for approval of new law schools.[14] TWU now knew, or thought it knew, where the goalposts were for the accreditation of its proposed law school.

TWU submitted its proposal in June 2012 to the Federation of Law Societies of Canada, as that appeared to be the appropriate professional accreditation body. It also submitted the proposal to the Minister of Advanced Education in British Columbia. The Minister approves all new programmes for universities in the province.

TWU had gone out of its way to ensure that its proposal had the best possible chance for approval. Most universities in Canada are public universities, regulated and funded by provincial governments. Very few are private, and most of those are religiously based. TWU knew that as the first private and first Christian university to apply for approval of a law school, it needed to be twice as good as other proposals.

TWU's proposal fulfilled all the criteria required by the Federation. Its developers had consulted with the head of the Council of Canadian Law Deans, the Law Society of British Columbia and the deans of other law schools in British Columbia. None of these entities expressed concerns.

As part of its approval process, the Federation also consulted the Council of Canadian Law Deans and the Law Society of British Columbia. The law deans issued an open letter condemning the proposal on the basis of the university's required community covenant.[15] The media quickly picked up the story,[16] creating pressure on the Federation to deny approval.

The Federation appointed a Special Advisory Committee of experts to address concerns raised about the code of conduct. The advisory committee concluded that as long as the national requirement was met, there was no public-interest reason to exclude future graduates of TWU from law society bar admission programmes. The Federation therefore approved the law school.[17]

The British Columbia Minister of Advanced Education had its own process

13 Ad Hoc Committee on Approval of New Canadian Law Degree Programs, *Report on Applications by Lakehead University and Thompson Rivers University*, Federation of Law Societies of Canada, January 2011, http://docs.flsc.ca/Task-Force-Report-new-law-schools.pdf, 2.

14 Common Law Degree Implementation Committee, 'Final Report', Federation of Law Societies of Canada, August 2011, http://docs.flsc.ca/Implementation-Report-ECC-Aug-2011-R.pdf.

15 Bill Flanagan (President, Canadian Council of Law Deans), letter to Federation of Canadian Law Societies, 20 November 2012, www.docs.flsc.ca/_documents/TWUCouncilofCdnLawDeans-Nov202012.pdf.

16 Douglas Todd, 'Proposed Christian Law School at Trinity Western Under Fire Because of University's Anti-Gay Rules', *Vancouver Sun*, 17 January 2013, www.vancouversun.com/life/Proposed+Christian+school+Trinity+Western+under+fire+because+university+anti+rules/7830354/story.html.

17 Federation of Law Societies of Canada news release, 'Federation of Law Societies of Canada Grants Preliminary Approval of Trinity Western University's Proposed Law Program', 16 December 2013.

for approval. It had appointed an expert panel to do a site visit at TWU. Although some panel members had concerns over the required statement of faith for faculty members, the Minister approved the law school the day after the Federation announced its approval.

The university rejoiced, thinking that the accreditation process was complete and it could make plans to construct a building, hire faculty and recruit students. But this was not the final step.

An unexpected rejection

Although it appeared that provincial law societies had delegated their powers of accreditation to the Federation, that was not actually the case. This issue was important because only graduates from 'approved' law schools can clerk or practise law in each province. Ontario, the largest of Canada's ten provinces, was the only province that had not completed the process to delegate law school accreditation to the Federation. However, the benchers of the Law Society of British Columbia (the elected governing body) had voted to amend their delegation to allow themselves to reverse Federation approval.[18]

In both Ontario and British Columbia, lawyers supportive of LGBTQ rights mobilized opposition to TWU. Both law societies received submissions and held hearings regarding approval. Benchers' meetings are not usually well attended, but these hearings attracted large crowds and became highly politicized. TWU was compared with Bob Jones University in the US, known for prohibiting interracial dating. Bizarre religious issues were raised. TWU's prohibition was likened to the Canadian government's discriminatory head tax on Chinese immigrants (passed in 1885 to discourage further Chinese immigration) and Canada's former residential schools, which had been a collaborative venture of church and state to integrate Indigenous children into white society.

In the end, the law societies in Ontario and British Columbia denied approval of a law school at TWU.[19] Therefore, graduates from the proposed TWU law school would not be able to serve as lawyers in those provinces. The Minister of Advanced Education then withdrew approval on the basis that the law school could not function without professional accreditation.

The court cases

TWU brought legal challenges against the law society decisions on the basis that they violated the religious freedom of the university and its students. It did not take this step lightly; the Board of Governors wrestled with whether going to court was the right step. On one hand, Christians do not want to be perceived as homophobic. On the other hand, this issue was likely to arise for other Christian institutions in Canada as well, and TWU had the best chance of success given

18 Law Society of British Columbia, Law Society Rules, 2–54(3).

19 The Nova Scotia Barristers' Society also denied approval. That action is not addressed here because that law society had delegated approval to the Federation and did not have the authority to deny approval.

the 2001 precedent. In many ways, TWU saw itself as carrying the ball for the Christian community in Canada.

In British Columbia, TWU won at the provincial Supreme Court and the Court of Appeal.[20] These courts ruled that procedures followed by the law society resulted in the benchers failing to properly consider the university's religious freedom. The British Columbia Court of Appeal concluded:

> A society that does not admit of and accommodate differences cannot be a free and democratic society—one in which its citizens are free to think, to disagree, to debate and to challenge the accepted view without fear of reprisal. This case demonstrates that a well-intentioned majority acting in the name of tolerance and liberalism, can, if unchecked, impose its views on the minority in a manner that is in itself intolerant and illiberal.[21]

In Ontario, TWU lost at both levels of court.[22] The judgements ruled that the Law Society of Upper Canada's decision not to approve the TWU law school was reasonable. Justice MacPherson, in his Ontario Court of Appeal ruling, stated, 'My conclusion is a simple one: the part of TWU's Community Covenant in issue in this appeal is deeply discriminatory to the LGBTQ community, and it hurts.'[23]

The Supreme Court of Canada heard both the British Columbia and Ontario appeals together but issued separate judgements.[24] The court was deeply divided, issuing four separate opinions in each of the cases. In the result, seven justices were opposed to TWU's approval and two were in favour.

The majority judgement focused on the fact that signing the code of conduct is mandatory for all students even though the university is open to non-Christians. Thus, the ruling says, TWU 'imposes' its beliefs on students who may or may not share those beliefs. The justices made this statement even though the code of conduct recognizes explicitly that signing the code of conduct does not signify agreement.

Two justices wrote individual opinions against TWU. Justice Rowe stated that the denial of TWU's proposal did not constitute a violation of religious freedom, since evangelical Christian students are free to attend public university law programmes. Chief Justice McLachlin balanced the competing rights of religious freedom and LGBTQ equality and found in favour of the latter.

Justices Brown and Côté, dissenting, would have ruled in favour of TWU. They strongly affirmed religious freedom and the requirement of state neutrality. This quotation from their dissent summarizes their position:

> [I]n conditioning access to the public square as it has, the regulator has—on this Court's own jurisprudence—profoundly interfered with the constitu-

20 *Trinity Western University v. The Law Society of British Columbia* (LSBC) (2015), 85 BCLR (5th) 174 (BC Supreme Court); *Trinity Western University v. LSBC* (2016), 92 BCLR (5th) 42 (BC Court of Appeal).

21 *TWU v. LSBC* (Court of Appeal), para. 193.

22 *Trinity Western University v. The Law Society of Upper Canada* (LSUC) (2015), 126 OR (3rd) 1 (Ontario Divisional Court); *Trinity Western University v. LSUC* (2016), 131 OR (3rd) 113 (Ontario Court of Appeal).

23 *TWU v. LSUC* (Court of Appeal), para. 119.

24 *LSBC v. TWU,* [2018] 2 SCR 293 (Supreme Court of Canada); *TWU v. LSUC,* [2018] 2 SCR 453 (Supreme Court of Canada).

> tionally guaranteed freedom of a community of co-religionists to insist upon certain moral commitments from those who wish to join the private space within which it pursues its religiously based practices. While, therefore, the LSBC [Law Society of British Columbia] has purported to act in the cause of ensuring equal access to the profession, it has effectively denied that access to a segment of Canadian society, solely on religious grounds. In our respectful view, this unfortunate state of affairs merits judicial intervention, not affirmation.[25]

Responses to the decision

In the aftermath of the Supreme Court of Canada's ruling, several accreditation bodies for other professional programmes indicated that they planned to review TWU's prior approval. The TWU Board of Governors decided to make the community covenant non-mandatory for students but to maintain it for administration, faculty and staff. However, the university has not moved forward to establish a law school despite having removed what appeared to be the main factor cited in the adverse Supreme Court of Canada ruling.

The university chose to view the change in the code of conduct as an opportunity rather than a disaster. The student life programme has ensured that it is focused on helping students to experience Christ through chapel and Christian student leadership on campus rather than being hedged in by a code of conduct. Some students, of course, welcomed not having a set of rules to abide by. Others miss having common expectations for behaviour.

While the long-term consequences of the legal cases are not yet known, the university has experienced a growth in enrolment. The publicity resulted in TWU receiving applications for admission from additional parts of Canada. Since the community covenant was made non-mandatory for students, more non-Christians have enrolled. The divisions amongst the faculty continue. Some faculty hoped that the new president, appointed in 2019, would liberalize the theology of sexuality contained in the community covenant but that has not happened.

For me personally, this experience has been very challenging. I first approached TWU with the proposal of founding a law school in 1993, when I was the executive director of the Christian Legal Fellowship. I felt the development of the law school proposal was my calling, and it was a longtime dream for both Kevin Sawatsky and me. I still wrestle with understanding God's plan in all this.

Conclusions

This paper has examined the moving of the goalposts concerning the balance between religious freedom and LGBTQ rights at three different time periods. In 2001, a Christian university's right to establish its theology and religious practices on marriage and sexuality was respected. The Supreme Court of Canada ruled that these factors could not be used to restrict the approval of new programmes

25 *LSBC v. TWU* (Supreme Court of Canada), para. 261.

at the university. In 2005, when same-sex marriage was officially recognized by the Canadian government, the legislation specified that 'diverse views on sexuality' were not contrary to public policy. Again, Christians' theology of sexuality and marriage was recognized and respected. By 2018, however, the situation had changed, and holding to a traditional Christian theology of sexuality and marriage could be considered a bar to approval of new programmes on the basis that they created inequality for LGBTQ persons who may wish to attend the university.

There has been a progressive narrowing of the scope of religious freedom when it comes into conflict with LGBTQ rights. During the Supreme Court of Canada hearing, one lawyer argued that institutions that refuse to recognize equal rights for LGBTQ persons, regardless of whether they are rooted in religious beliefs, should lose all government benefits and recognition. Although the court's ruling did not comment on that argument, it may be a harbinger of where Canadian society is headed. The goalposts are shifting, and where they will finally end up is not yet certain.

Given the cultural, legal and political realities, what should Christian organizations do? Richard Niebuhr's five models of Christian interaction with culture are helpful here.[26] Separatists distance themselves from culture and continue to hold to traditional beliefs, engaging in minimal interaction with the state. At the other end of the spectrum lie culturalists, who would decide in cases like the TWU case that this is not a 'hill to die on' and would simply change or remove policies dealing with human sexuality. Dualists would take a similar approach. Synthesists and conversionists would both try to maintain their beliefs while engaging with their culture in positive ways. Synthesists might try to model positive heterosexual marriages; conversionists might engage with political and legal leaders to encourage them to accept the diversity of beliefs and practices around marriage.

Christians no longer influence culture and public policy as they once did in the West. In Canada, evangelical Christians constitute a very small percentage of the population. Organizations wishing to maintain a traditional view of marriage will find themselves marginalized and may have to accept the separatist stance of staying at a distance from government. For a Christian educational institution, this may mean foregoing not only government financial assistance but possibly accreditation as well.

Christian organizations must recognize the challenges in advance and plan their responses. If an organization has a clear plan and has determined where it is willing to compromise and where it will stand firm, this clarity may prevent internal conflict and public dissension. The battle for public opinion is vital, so it is crucial to choose and train spokespersons in advance.

Although we do not know where the goalposts will move, Christians know what they believe and why. Jesus sent out his disciples with these instructions: 'I am sending you out like sheep among wolves. Therefore be as shrewd as snakes and as innocent as doves' (Mt 10:6). This instruction is as relevant today as it was two thousand years ago.

26 H. Richard Niebuhr, *Christ and Culture* (New York: Harper, 1951).