

Citizenship Education: an International Comparison

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Introduction

The citizenship education thematic study is designed to enrich the International Review of Curriculum and Assessment Frameworks *Archive* (known as *INCA*) by examining six key aspects:

- curriculum aims, organisation and structure
- teaching and learning approaches
- teacher specialisation and teacher training
- use of textbooks and other resources
- assessment arrangements, and
- current and future developments.

These aspects of citizenship education, for students aged five to 16/18, are used to structure the study. The study combines material from: the International Review of Curriculum and Assessment Frameworks Project (the International Review, comprising *INCA* and previous thematic studies); specific enquiries about citizenship education addressed to the 16 countries; discussion at the invitational seminar on citizenship education held by QCA in January 1999 and published sources such as the National Case Study chapters from Phase 1 of the IEA Civics Education Project³ and others (see Appendix 1). Practice in the 16 countries studied is outlined where known, although complete information is not available for all of them at this stage. References are to the 16 countries in the International Review and cannot be generalised beyond these.

Basic details of the structure and aims of the education systems in the 16 countries studied are provided in Appendices 2 and 3, which indicate:

- compulsory education (starting age, duration)
- educational phases (broadly categorised as pre-school, primary, lower secondary and upper secondary), and
- educational aims, purposes, goals and principles.

The combination of what is contained in *INCA* about citizenship education (largely factual information) and the findings of previous thematic studies, with the richer contextual information and analysis from those countries also involved in the IEA Civics Education Project, is intended to produce deeper insights into policy and practice in this area at individual country level, and to raise fundamental questions about aspects of citizenship education as they emerge from the comparative analysis. Some sections of this paper are shorter than others, while others provide more detailed information on certain countries. In each section of the study the key questions for further investigation and discussion are highlighted. Even where details are contained in *INCA* there may be a considerable gap between the rhetoric of policy and the reality of practice.

³ Of the 16 *INCA* countries 10 are or have participated in Phases 1 and 2 of the IEA Civics Education Project. Australia, England, Germany, Hungary, Italy, Switzerland and the USA participated in Phase 1 and are also participating in Phase 2. Canada and the Netherlands participated only in Phase 1 and Sweden is only participating in Phase 2. The outcome of Phase 1 was a national case study report from each country. These case study reports have been used to supplement *INCA*.

Exploring the nature and extent of this gap was a fascinating part of the invitational seminar. It highlighted the fact that, though there are gaps in our knowledge and understanding, there are considerably more areas of common interest and approach to citizenship education across countries. It is hoped the study will encourage further, in-depth exploration of these commonalities, both within and across countries. Such exploration provides important pointers to ensuring more co-ordinated and effective policy and practice in citizenship education.

Citizenship education

Citizenship or civics education is construed broadly to encompass the preparation of young people for their roles and responsibilities as citizens and, in particular, the role of education (through schooling, teaching and learning) in that preparatory process. The term 'citizenship education' is used deliberately throughout this study as it is the term, which describes this area in the curriculum in England. Though there is an attempt to draw a distinction between *citizenship education* and *civics education* later in the study (in line with other commentators, notably Kennedy (1997) and McLaughlin (1992)), the area of citizenship education is covered by a wide range of terms across the 16 countries and comprises many subjects. These terms include citizenship, civics, social sciences, social studies, world studies, society, studies of society, life skills and moral education. The area also has links to curriculum subjects and options, including history, geography, economics, law, politics, environmental studies, values education, religious studies, languages and science. The range of terms and subject connections underlines the breadth and complexity of the issues addressed within this area. This breadth and complexity is both a strength and a weakness.

Citizenship education is highly topical in many countries, at present, as the new century approaches and urgent consideration is given to how better to prepare young people for the challenges and uncertainties of life in a rapidly changing world (Ichilov, 1998). The 'millennium effect' should not be underestimated. It is no coincidence that the majority of International Review project countries are undertaking major reforms of schools and the curriculum which will be in place by 2004. Citizenship education is very much part of this reform process. It underlines the fact that democratic societies, of whatever type and age, from the new democracies of central and eastern Europe, such as Hungary, to the more established democracies such as England and the United States of America (USA), are constantly evolving and responding to change (sometimes planned, sometimes quite unexpected). It is the varied responses of countries to the unprecedented level and pace of global change at the end of the twentieth century which makes this thematic study so fascinating and timely.

England is no exception to this evolutionary process. Indeed, the place and purpose of citizenship education in schools is currently being examined in England, as part of the wider on-going review of the National Curriculum (Kerr, 1999 a and b). The Secretary of State for Education and Employment, David Blunkett, recently set up an advisory group on *Education for Citizenship and the Teaching of Democracy in Schools*, chaired by Professor Bernard Crick, with a remit:

to provide advice on effective education for citizenship in schools - to include the nature and practices of participation in democracy, the duties, responsibilities and right of individuals as citizens; and the value to individuals and society of community activity.

The group was specifically invited by the Secretary of State to set out the aims and purposes of citizenship education and how it could be successfully delivered, both within and outside the formal school curriculum, and through links between schools and the wider community.

The group unanimously agreed a final report, which was published in September 1998, with the central recommendation that 'the teaching of citizenship and democracy is so important both for schools and the life of the nation, that there should be a statutory requirement on schools to ensure that it is part of the entitlement of all pupils.' (Crick, 1998). The report and its recommendations are currently being considered by the Secretary of State, the Department for Education and Employment (DfEE) and QCA as part of the National Curriculum review. It makes this thematic study particularly apposite to the English

context. It is hoped that the outcomes of the study will be of equal benefit to other countries, including those not directly involved in the International Review project.

Curriculum aims, organisation and structure

Key questions for discussion

- *What are the main influences on definition and approaches to citizenship education?*
- *Is there a commonly accepted definition of citizenship and citizenship education?*
- *How is citizenship education defined?*
- *How is citizenship education approached in the school curriculum?*
- *Is there a specific time allocation for citizenship education in the school curriculum?*

Citizenship education in context

The curriculum aims, organisation and structure of citizenship education can only be fully understood by recognising the important role of context. This fits with the basic philosophy underlying the International Review project, namely that context is crucial to an understanding of policy and practice. Context is particularly important in reviewing citizenship education. The complex and contested nature of the concept of citizenship leads to a broad range of interpretations. These interpretations mean that there are many different ways in which citizenship education can be defined and approached. This is underlined in a number of recent comparative studies on citizenship, civics and education for democracy (Torney-Purta et al., 1999; Hahn, 1998; Ichilov, 1998; Kennedy, 1997).

This diversity of approach came through very strongly in the presentations at the invitational seminar. However, participants agreed that through approaches and programmes in citizenship education could be readily be transported from one country to another, such approaches and programmes would only succeed if they took due account of the unique historical, cultural and social traditions of the new context. As is the case in human transplant operations, if the new component did not match existing components it would be quickly rejected. This is an important lesson when citizenship education is being reviewed and renewed. What works in one context cannot simply be transported to another. Careful adaptation rather than wholesale adoption should be the watchword. This applies whether at national, regional, local, school or individual classroom level. A number of the newer democracies among the 16 international review countries, reported difficulties when attempting to introduce ideas and practices from the longer established democratic countries into their schools. This was very evident in Hungary and Korea. It is therefore important to recognise and respect not only the breadth of interpretations of citizenship across the 16 countries but also different approaches which such interpretations lead countries to take to citizenship education.

However, comparative studies, by their nature, enable the highlighting of similarities as well as differences. The contextual base provided by the 16 International Review Project countries, while enabling differences in approach to citizenship education to be identified, also affords the opportunity to distinguish factors which influence definitions of citizenship and citizenship education. These factors can then be examined in order to highlight common challenges in citizenship education, even though the approaches to those challenges may vary from country to country. Indeed as shown by the outcomes of this study, the identification of these common challenges and the discussion of responses to them has the potential to greatly enrich our knowledge and understanding of this complex area.

Broad contextual factors in citizenship education

A review of *INCA* and other literature sources reveals a number of broad contextual factors which influence the definition of and approaches to citizenship education in the 16 countries involved in the project. The main contextual factors are:

- historical tradition
- geographical position

- socio-political structure
- economic system, and
- global trends.

There is neither space nor time in this paper to examine their relative influence and interplay within each country and across countries. Instead a few examples of influence are given under each factor to highlight their impact on definition and approach.

Historical tradition

An understanding of the tradition of how citizenship rights have developed over decades and centuries and the balance achieved between rights and obligations in each country is vital. It helps to explain how underlying values which define how citizenship education has been, and continues to be, approached in that country have evolved. For example, there are clear differences between the Confucian traditions in south-east Asian societies such as Japan, Korea and Singapore, and the social democratic and liberal democratic traditions in England and its former colonies such as the USA, Canada, Australia and New Zealand. This need to understand the tradition of citizenship manifests itself in a number of countries in the close linkage of citizenship education and history in the curriculum.

This historical tradition is not static. Political theorists are continually attempting to define citizenship and to categorise approaches to the rights and obligations anticipated with it. Perhaps the most famous definition is T.H. Marshall's 1950 categorisation of citizenship as the extension of legal, political and social rights. Marshall's definition still underpins discussion of citizenship in many industrialised countries. However, Janoski (1998) has recently reappraised Marshall's definition. This has been brought about by a concern about significant changes in the organisation and conduct of modern societies, and, in particular, the move to more suburban living and the growing influence of large-scale public and private bureaucracies (some at multinational level). The reappraisal has led Janoski to suggest the addition of a fourth category of rights to Marshall's definition, following on from social, namely participation rights.

This is an interesting, if yet, untested hypothesis with clear implications for the definition of and approaches to citizenship education. Interestingly, most International Review project countries include among their aims or goals of citizenship education a strong commitment to the creation of informed, participative citizens who possess the necessary tools to tackle everyday issues. What is also apparent from *INCA* and other literature is that, whatever the historical tradition, the concept of citizenship is coming under increasing strain in all countries from the myriad pressures brought by people trying to live and work together in modern societies.

Geographical position

Where a country is located also influences how citizenship education has been and continues to be approached. For example, Canada still battles to reconcile the legacy of its colonial past, and the links to Britain and France, with the growing influence of its neighbour the USA. Meanwhile, Hungary and Germany are adapting to the collapse of the Soviet empire, while Korea is influenced by its relations with its northern neighbour.

Socio-political structure

The socio-political structure in a country reinforces the values and traditions underpinning society and is the major influence on the direction and handling of legal, political, social and economic matters. The degree of influence of this factor is dependent on a number of variables, most notably, the size of the country and the type of government. Size and type ranges from the small, highly centralised, city-state of Singapore to the much larger, federal states of America. However, even countries small in size can have complex socio-political structures, such as Switzerland with its mix of Swiss, French and German speaking cantons. Changes in the socio-political structure have had, and continue to have, a profound effect on citizenship education. This is very evident in modern times. The growth of more centralised bureaucracies, even in federal systems, with their increasing influence and control over education systems, means that changes in government assume greater importance. Such changes can have a marked influence on the definition of, and approach to, citizenship education and, in particular, the response to current citizenship challenges such as national identity and social cohesion. For example, recent changes of government in England, Sweden, Italy and Australia are having a

considerable influence on the nature and direction of citizenship education in those countries. Sometimes this influence can be positive and at other times retrograde.

Economic system

This factor is important at both the micro level of national economies and the macro level of moves to create larger supranational trading blocs, such as the European Union (EU), and international trade agreements, such as GATT. It means that the micro is increasingly being influenced by the macro, thereby bringing a number of challenges for citizenship education. For example, south-east Asian countries, such as Japan, Singapore and Korea, which concentrated much of their efforts from 1945 on industrialisation and rapid economic growth are now having to deal with the downturn in the world economy. Meanwhile, Australia and New Zealand are repositioning themselves as part of the Pacific Rim economy and away from their former Commonwealth trading partners. Many countries, particularly those in Europe, have to deal with the impact of the migration of workers, both invited and uninvited, across national borders. These challenges present a mixture of opportunity and threat, as shown in attitudes to the European Union (EU). The EU offers greater economic and political cohesion on the one hand, but threatens national identity and self-determination on the other.

Global trends

There is a growing awareness of the impact of what have been termed 'civic megatrends' (Kennedy, 1997), that is developments that affect all countries. These stem from the rapid pace of change in modern life which has brought about a reduction in the perceived size of the planet. This has led to talk of the world as a 'global village', where it is possible to communicate, trade, visit, live and often fight with other peoples and places on a scale never before possible. These trends are presenting a number of challenges to citizenship which are common to all countries. These common challenges are discussed at a later point in this study.

Detailed structural factors in citizenship education

The broad contextual factors outlined above, in turn, influence the nature of a number of detailed structural factors concerning the organisation of the system of government and education in each country. These structural factors are important because they impact not only on the definition and approach to citizenship education but also on the size of the gap between the rhetoric of policy (what is intended) and the practice (what actually happens) in citizenship education. The main structural factors are:

- organisation of, and responsibilities for, education
- educational values and aims, and
- funding and regulatory arrangements.

Organisation of, and responsibilities for, education

How education is organised and how responsibilities are held and delegated by governments within education systems is an important structural factor. The 16 countries in this study can be divided into two groups:

Group A: Those with centralised governments: England, France, Hungary, Italy, Japan, Korea, the Netherlands, New Zealand, Singapore, Spain and Sweden

Group B: Those with federal governments: Australia, Canada, Germany, Switzerland and the USA

There are considerable differences between the two groups in their definition of, and approach to, citizenship education. Countries in Group A have national education systems, and national influence and control can be exercised through a variety of regulatory means - reflecting different balances between national, regional, local and/or municipal government. Practice varies in citizenship education from a highly specified, centrally determined curriculum in Singapore, Korea and Japan, to more flexible arrangements with considerable local autonomy in Italy, Hungary and Spain.

In the federal states of Group B, education is the responsibility of the regions and a nationally agreed definition of, and approach to, citizenship education, as such, can only exist provided the regions agree to it both in

principle and in practice. Canada, Switzerland and the USA do not appear to have developed centralised guidance, but Australia provides an interesting example of a federal country, which is attempting to develop such national, (non-statutory) guidance for citizenship education. In Australia, ten national ‘common and agreed goals for schooling’ have been set out by the Australian Education Council since 1989. Goal 7 ‘to develop knowledge, skills, attitudes and values which will enable students to participate as active and informed citizens in our democratic Australian society within an international context’ and Goal 6 ‘to develop in students a capacity to exercise judgement in matters of morality, ethics and social justice’ make explicit reference to citizenship education.

They offer a structure for co-operation between schools, states, territories and the Commonwealth. A number of states in the USA, among them Kentucky, Maryland and Wisconsin, are also attempting to set standards or expectations for citizenship education through voluntary national standards. These are linked to the establishment of and overarching goals or principles in certain subjects, notably social studies, civics, history and geography.

Educational values and aims

Educational values and aims are an extremely important structural factor. How countries express their values has a marked influence on the definition of, and approach to, citizenship education. The earlier thematic study *Values and Aims in Curriculum and Assessment Frameworks*, conducted by Joanna Le Métails of NFER in 1997, categorised the 16 countries into three broad groups, according to the degree of detail with which national values are expressed or prescribed in education legislation. It is worth bearing these categories in mind when comparing approaches to citizenship education across the 16 project countries. The three categories were:

1. Minimal reference to values in education legislation

The countries in this group share a commitment to pluralism and devolved authority. Values are expressed in the Constitution and/or statutes, which provide a framework for the expression of values through devolved educational structures. They include Canada, England, Hungary, the Netherlands and the USA.

2. National values expressed in general terms

In this group of countries, general statements on values are made at national level, but the details are determined by authorities with devolved responsibilities. They include Australia, New Zealand, Italy and Spain.

3. National values expressed in detail

Countries with highly centralised systems tend to express very detailed aims and clear educational and social values. They include Japan, Korea, Singapore and Sweden.

‘Values-explicit’ and ‘values-neutral’ citizenship education

The three broad categories described above correspond with one of the major tensions countries face in approaching citizenship education, namely the extent to which it is possible to identify, agree and articulate the values and dispositions which underpin citizenship. This tension is both philosophical and practical. The response hinges in many countries on the answer to a simple question: is citizenship education ‘values-explicit’ or ‘values-neutral’? Should citizenship education be ‘values-explicit’ and promote distinct values which are part of a broader nationally accepted system of public values and beliefs? Or should it be ‘values-neutral’ or ‘values-free’ and take a neutral stance to values and controversial issues, leaving the decision on values to the individual? The answer determines a great deal about a country’s approach to citizenship education.

This tension is part of the broader debate about the balance between the ‘public’ and ‘private’ dimensions of citizenship, leading to what the educational philosopher McLaughlin (1992) has termed ‘thick’ and ‘thin’ citizenship education. Those who view citizenship as a largely ‘public’ concern see a major, or ‘thick’, role for education (through the school and formal curriculum) in the promotion of citizenship and, in particular for teachers. Those who view citizenship as a largely ‘private’ affair see a much more limited, or ‘thin’, role for education (largely through the hidden curriculum). They advocate a much stronger role for the family and community organisations than for teachers. ‘Values-explicit’ approaches are commonly criticised for the associated dangers of bias and the indoctrination of students, while ‘values-neutral’ approaches are attacked for their failure to help students to deal adequately with real-life, controversial issues.

Examining the three broad categories it is clear that those countries in the first category take a ‘values-neutral’ approach to citizenship education (this has certainly been the tradition in England); those in the second category are somewhere between ‘values-neutral’ and ‘values-explicit’, depending on the decisions of devolved authorities; while those in the third category are very much ‘values-explicit’ in approach. The implications of the positions for the linkage between rhetoric of policy and actual practice in citizenship education came through very strongly in the presentations at the invitational seminar. Those countries with a ‘values-explicit’ approach, such as Singapore and Korea, were much clearer than those from a ‘values-neutral’ tradition, as to what citizenship education is (aims and goals) and consequently the role of schools, teachers and the curriculum in achieving those goals.

The certainty of such ‘values-explicit’ approaches is very alluring. Seminar participants were agreed that a clear, publicly accepted definition of citizenship was a tremendous benefit in facilitating effective practice in citizenship education. It enabled everyone involved in citizenship education – schools, teachers, students, parents, community representatives, public figures – to be clear about the aims and goals; to understand their roles and responsibilities in achieving those aims and goals; and provided a strong framework upon which approaches and programmes could be constructed with certainty and purpose. Without such a definition there was a danger that citizenship education became a ‘catch-all’ for lots of related topics and aspects and that this lack of focus made it a lower status, low priority area in schools. One participant summed up the effect with a quote from the Jeremiah “Without a vision the people perish”. A clear vision does not guarantee good practice but it is a vital starting-point.

The tripartite categorisation is particularly topical given the claims of some commentators that many countries in response to the challenges and uncertainties in the modern world are moving toward a more explicit statement of the values and aims underpinning their education systems. Indeed this is an interesting development in the current review of the National Curriculum in England. QCA have produced a draft statement of values, aims and purposes of the school curriculum as a potential way of helping schools to develop their own curriculum in a way which reflects the spirit of nationally agreed aims (QCA, 1999). The challenges and uncertainties are forcing countries to re-examine and adjust many of their underlying cultural traditions, values and assumptions. It helps to explain the considerable debate about the values underpinning citizenship education, particularly in those countries with a tradition of a ‘values-neutral’ approach. National values are constantly evolving and that impacts on citizenship education.

National aims of education

Differences in the expression of values also affect what countries decide are the national aims of education and on how those are articulated. The most commonly articulated aims across the 16 countries are:

- developing the capacities of the individual
- promoting equal opportunity
- preparing young people for work
- establishing a foundation for further and higher education
- providing knowledge, skills and understanding
- promoting citizenship (sometimes in the form of promoting democracy or community), and
- ensuring cultural heritage (or literacy).

Of interest to this study is a recognition that most countries specify, either explicitly and/or implicitly, the promotion of citizenship as a fundamental national aim of education (see Appendix 3). However, there is considerable variation as to what this aim encompasses and how far it is translated into policy and practice. In many countries the promotion of citizenship is linked to the overall educational aim of developing well-rounded individuals, or as it is described in Singapore ‘to nurture a person of integrity’. However, such promotion is not solely about developing values and dispositions. It also involves a specific knowledge component as well as practical experience of community interaction. Some seminar participants felt that not enough was being done to turn the rhetoric of developing active, participative citizens into meaningful practice.

Funding and regulatory arrangements

Differences in educational funding arrangements and how countries regulate their curriculum and assessment frameworks can also have a powerful impact on citizenship education. The source of school funds differs considerably between countries, and frequently drives - or reflects - the relationships between government levels in the control of education. For example, in Japan's balanced system of roles for national government, prefectures and municipalities, there is a tradition of consensus policy-making working alongside detailed Ministry controls. Funding reflects the relationship: each of the three main levels of government provides for its own educational responsibilities from its own taxes and other income, yet there are significant general and specific subsidies from national government. In Sweden, national funds are provided to municipalities and are not directly linked to specific forms of school organisation; this is for the municipalities to resolve.

These different funding arrangements can influence the emphasis given to citizenship education, particularly in relation to other subjects and areas of the curriculum. This emphasis can be both negative and positive. In a number of countries, the challenge is to maintain the profile and status of citizenship education in the face of a growing national priority on ‘basic’ aspects of the curriculum. These basic aspects include literacy, numeracy, information and communications technologies (ICT) and science and technology. This challenge is most apparent in Canada, though it is an undercurrent in the discussions about citizenship education in the revised National Curriculum in England. Meanwhile, in other countries the carrot of central funding is being used to promote citizenship education and change practice. For example, in Australia, the federal government has launched the ‘Discovering Democracy’ initiative with funding for the production of classroom materials and teacher training in a bid to encourage states and schools to get involved.

Further differences exist in how countries regulate their curriculum and assessment frameworks. There are examples of countries which adopt regulated syllabuses (e.g. Singapore), attainment targets (e.g. Hungary), basic standards (e.g. Spain), statements of outcome (e.g. New Zealand and parts of Australia), authorised or approved textbooks (e.g. Korea) and school curriculum plans with national core objectives serving as national goals (e.g. the Netherlands). There are also different degrees of authority assumed by government - with some countries adopting guidelines while others mandate localities or schools, through law and other regulation. In a few countries (for example, in France, Japan and England), inspection is also used to ensure schools comply with curricular and assessment expectations. All these differences impact on citizenship education, particularly where it is part of the statutory curriculum experience for students and must therefore comply with national curriculum and assessment frameworks.

Common challenges in citizenship education

Many of the differences in the definition of, and approach to, citizenship education across the countries have arisen because of the interplay and influence of their broad contextual and more detailed structural factors. A recognition of this contextual and structural background is vital to an understanding not only of how citizenship education has evolved across time, but also as to how countries are responding to the current challenges in this area. The identification of these challenges and the quest to examine the responses of International Review Project countries to them is at the heart of this thematic study.

A review of *INCA* and the literature on citizenship education reveals concern in many countries about how to respond to a period of unprecedented global change. This concern was confirmed by the participants at the

invitational seminar. The concern is both immediate – how to respond in the short term through current economic, social and political policies – and more long-term – how better to prepare current and future generations for their roles and responsibilities as citizens, parents, consumers, workers and human beings. Seminar participants agreed that there is no simple, ‘quick-fix’ solution. Though the aims and intended outcomes of citizenship education can be readily drawn up, their successful achievement is a long-term project, often involving more than one generation of students and teachers. The unprecedented global change has thrown up a common set of challenges or issues for countries, which demand a response. They include:

- the rapid movement of people within and across national boundaries
- a growing recognition of the rights of indigenous peoples and minorities
- the collapse of political structures and the birth of new ones
- the changing role of women in society
- the impact of the global economy and changing patterns of work
- the effect of a revolution in information and communications technologies
- an increasing global population, and
- the creation of new forms of community.

The last challenge is of particular relevance in many countries at the moment, with concern about the lack of interest in and involvement of young people in public and political life; what has been termed a ‘democratic deficit’.

These challenges touch on complex issues concerning pluralism, multiculturalism, ethnic and cultural heritage and diversity, tolerance, social cohesion, collective and individual rights and responsibilities, social justice, national identity and consciousness, and freedom among others. The education system is a vital part of the response to these challenges. Although countries have similar sets of national aims in dealing with these challenges and issues, including the aim of promoting citizenship and democratic values, they approach those aims in many different ways. This is, in part, because of the influence of the broad contextual and more detailed structural factors highlighted earlier in the paper.

This variety is underlined when examining the aims and approaches of the INTERNATIONAL REVIEW Project countries to two of these complex issues, namely national identity and social cohesion. Such an examination was undertaken in the earlier thematic study on *Values and Aims in Curriculum and Assessment Frameworks* (SCAA, 1997) and the findings are repeated here.

Examining the INCA archive reveals a variety of approaches to the issues of national identity and social cohesion.

Aims

promoting social cohesion through respect for, and the reconciliation of, diversity

Australia: the National Agenda for Multicultural Australia encourages immigrants to preserve their culture

Hungary: the recognition and integration of the numerous minorities, following the withdrawal of Soviet control

Netherlands: basing education on the principle that pupils grow up in a multicultural society

Sweden: the internationalisation of Swedish society combined with increasing cross-border mobility place great demands on people’s ability to live together and appreciate the values that are to be found in cultural diversity

Switzerland: education should encourage respect for other languages and cultures

the preservation of cultural or linguistic heritage

Australia: promotes understanding and respect for Australia’s cultural heritage, including the particular cultural background of Aboriginal and ethnic groups

Canada: safeguards the linguistic freedom of the French-speaking minority

Netherlands: promotes understanding and respect for cultural heritage and protects the Frisian language by its teaching and use in schools in Friesland

New Zealand: respects the diverse ethnic and cultural heritage of New Zealand people with acknowledgement of the unique place of the Maori

Sweden: awareness of one’s own cultural origins and sharing in a common cultural heritage provides a secure identity which it is important to develop, together with the ability to empathise with the values and conditions of others

Switzerland: safeguards linguistic diversity (French, German, Italian and Romanch)

the (re)assertion of a national identity after political upheaval

Germany: following reunification, Germany has focused political and organisational efforts on re-establishing unity between the 11 old and five new *Länder* in the fields of education, science, culture and sport, and particularly on the establishment of a common and comparable basic structure for education

Hungary: is re-establishing a national identity after decades of Soviet control, taking into consideration its people resident outside Hungary and the minorities within

national assertiveness within an international framework

Hungary: finding the place of the Nation State in the wider world

Japan: educating the individual to live in the global human society

Korea: education has served as a means of political socialisation by causing intentional changes in knowledge, behaviour, values and outlook on the nation and the world. It aims to promote patriotism and affection for others for the continuance and development of national independence, as well as world peace and to preserve and develop national culture

New Zealand: acknowledgement of New Zealand's role in the Pacific and as a member of the international community of nations

Provision

INCA shows several approaches to securing social cohesion:

- *active promotion of multicultural knowledge, skills and understanding for all*, e.g. by including the study of other cultures in the curriculum (Australia, the Netherlands)
- *parity of provision*, by supporting the establishment of schools catering for specific religious or cultural groups e.g. religious schools in many countries, specialist Maori medium schools in New Zealand
- *support for the minority group*, e.g. providing facilities for a minority language community to run mother tongue classes (several countries)
- *compensatory programmes* for those perceived as disadvantaged in terms of the national culture or language e.g. national language classes for immigrants (Australia)

Singapore implicitly promotes social cohesion through values, by explicitly according priority to the needs of the community and the nation over those of the individual. Schools in Sweden are charged with the task of actively confronting xenophobia and intolerance with knowledge, open discussion and effective measures.

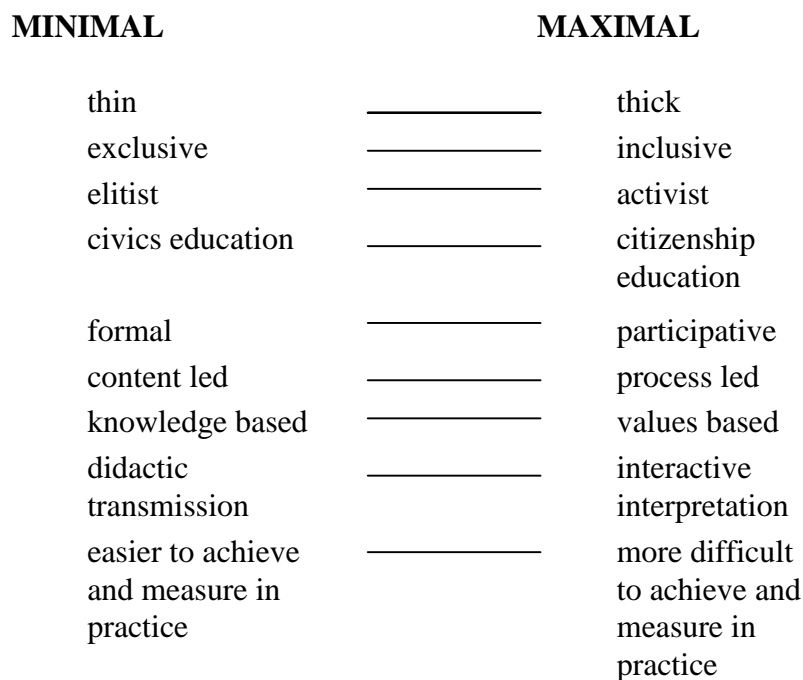
Several countries reinforce the sense of national identity and inculcate pride through ceremonial saluting of the flag and singing the national anthem in school (e.g. Singapore, Japan and the USA).

Though participants in the invitational seminar recognised the diversity of approach to the issues, they were motivated by the opportunity to explore areas of common concern and interest and to learn from the experiences of others. Such an approach enabled the discussion to move beyond the rhetoric to a more in-depth analysis of what is meant by 'effective' citizenship education and how it can be best achieved in practice.

A continuum of citizenship education

The broad range of approaches to these challenges and issues and the subsequent discussion at the invitational seminar suggests the existence of a continuum of citizenship and citizenship education (see Figure 1). Indeed, political philosophers and commentators argue that citizenship is conceptualised and contested along a continuum, which ranges from a **minimal** to a **maximal** interpretation (McLaughlin, 1992). Each end of the continuum displays different characteristics, which affect the definition of, and approach to, citizenship education.

Fig.1 Citizenship education continuum



Minimal interpretations are characterised by a narrow definition of citizenship. They seek to promote particular exclusive and elitist interests, such as the granting of citizenship to certain groups in society but not all. Minimal interpretations lead to narrow, formal approaches to citizenship education - what has been termed *civics education*. This is largely content-led and knowledge-based. It is centred on formal education programmes which concentrate on the transmission to students of knowledge of a country's history and geography, of the structure and processes of its system of government and of its constitution. The primary purpose is to inform through the provision and transmission of information. It lends itself to didactic teaching and learning approaches, with teacher-led, whole-class teaching as the dominant medium. There is little opportunity or encouragement for student interaction and initiative. As the outcomes of minimal approaches are narrow, largely involving the acquisition of knowledge and understanding, it is much easier to measure how successfully the outcomes have been achieved, often through written examinations.

Maximal interpretations are characterised by a broad definition of citizenship. They seek to actively include and involve all groups and interests in society. Maximal interpretations lead to a broad mixture of formal and informal approaches to what has been termed **citizenship education**, as opposed to narrower civics education. This citizenship education includes the content and knowledge components of minimal interpretations, but actively encourages investigation and interpretation of the many different ways in which these components (including the rights and responsibilities of citizens) are determined and carried out. The primary aim is not only to inform, but also to use that information to help students to understand and to enhance their capacity to participate. It is as much about the content as about the process of teaching and learning. It lends itself to a broad mixture of teaching and learning approaches, from the didactic to the interactive, both inside and outside the classroom. Structured opportunities are created for student interaction through discussion and debate, and encouragement is given to students to use their initiative through project work, other forms of independent learning and participative experiences. As the outcomes of maximal approaches are broad, involving the acquisition of knowledge and understanding, and the development of values and dispositions, and skills and attitudes, it is much more difficult to measure how successfully these outcomes have been achieved.

Although the interpretations are polarised when laid out in this way, nevertheless they provide a useful, if crude, scale for determining where each country broadly stands in its definition and approach to citizenship education. Certainly, seminar participants found the continuum useful in conceptualising approaches to citizenship education. However, it was pointed out that an equally valid way of conceptualising approaches is by intended aims or goals. Looked at in this way citizenship education comprises three strands:

- **Education ABOUT citizenship**
 - **Education THROUGH citizenship**, and
 - **Education FOR citizenship**
- **Education ABOUT citizenship** focuses on providing students with sufficient knowledge and understanding of national history and the structures and processes of government and political life.
 - **Education THROUGH citizenship** involves students learning by doing, through active, participative experiences in the school or local community and beyond. This learning reinforces the knowledge component.
 - **Education FOR citizenship** encompasses the other two strands and involves equipping students with a set of tools (knowledge and understanding, skills and aptitudes, values and dispositions) which enable them to participate actively and sensibly in the roles and responsibilities they encounter in their adult lives. This strand links citizenship education with the whole education experience of students.

Seminar participants agreed that it was much easier to deliver ‘**education ABOUT citizenship**’, than the other two strands. However what was taught for one or two hours per week in the classroom was not sufficient to equip students with what was required for their future participation in ‘**education FOR citizenship**’. Instead countries needed to set out the values, dispositions, skills and aptitudes underpinning citizenship education and build in experiences (the ‘**education THROUGH citizenship**’ strand) which complemented the ‘**education ABOUT citizenship**’ strand. Though this was being attempted in some countries much more needed to be done before the goals of ‘**education FOR citizenship**’ were achieved.

Whichever way it is conceptualised, in practice, there are two parallel continuums of citizenship education in operation. The first continuum is at the national level within each country. There is constant movement both backward and forward along this national continuum dependent on the interplay of factors. For example, countries in south-east Asia and in central and eastern Europe are currently attempting to move from a formal (‘**education ABOUT**’) to a more participative (‘**education THROUGH**’) approach to citizenship education. This is in line with revised national educational goals which stress the need for more critical thinking and increased initiative and creativity. Meanwhile, in Australia, the new Liberal-National Party federal government has introduced the ‘Discovering Democracy’ initiative, which is grounded in a more formal ‘**education ABOUT**’ approach to Australia’s national history and constitution, in contrast to the approach of the previous government. Every country experiences these episodes of introspection and revision of citizenship education. Interestingly, the conduct of this thematic study suggests that these episodes may be becoming more frequent and sustained, with some countries close to a perpetual state of review and revision.

The second continuum is at the comparative level across the 16 International Review Project countries. Applying this crude comparative scale places those countries in south-east Asia more toward the minimal, ‘**education ABOUT**’ end of the continuum, those in southern, central and eastern Europe somewhere in the middle, and those in northern Europe and some of the former British colonies such as the USA and New Zealand more toward the maximal ‘**education FOR**’ end. However, this scale is indeed very crude and there are exceptions. Australia, interestingly, views itself as somewhere in the middle of the scale but striving for the maximal, while Hungary is attempting to move away from the minimal. Canada probably cannot be placed because of the variation across its provinces.

Approaches to citizenship education

How citizenship is defined in relation to the continuum affects how citizenship education is approached in schools. Tables 1 and 2 attempt to categorise the terminology, approach and amount of time per week given to citizenship education across the 16 countries. It must be emphasised that this is an attempt to quantify approaches to citizenship education in the formal curriculum. In most countries, citizenship education is

broader than the formal curriculum, involving the hidden curriculum, whole-school and extra-curricular activities, as well as students' everyday experiences of life.

Some countries are attempting to build these activities into the formal curriculum. For example, Japan has special activities, while Singapore has developed a community involvement programme and learning journeys around the key institutions. Other countries have left the choice to schools. In the USA, there has been an expansion in 'service learning' education based on active partnerships between schools and their local communities. It is a growing area of interest in England through the activities of Community Service Volunteers (CSV) and others. Meanwhile some countries are strengthening the involvement of students in school or class councils. However, it is not easy to obtain reliable information on these broader experiences for all countries.

Table 1 examines the curriculum for pupils' aged 5 to 11, what is termed in *INCA* as the primary phase. Table 2 looks at the curriculum for students' aged 11 to 16 or 18, what is termed in *INCA* as the lower and upper secondary phases.

What patterns, if any, are discernible? An examination of both tables enables four points to be made. The first point is that citizenship education and its related issues are addressed in the formal curriculum across the whole age range in every country. The second point to note is the broad range of terms used to describe this area. The third point is the existence of three main curriculum approaches to citizenship education, namely separate, integrated and cross-curricular. In the separate approach, citizenship education or civics is a specific subject or aspect. In the integrated approach, it is part of a broader course, often social sciences or social studies, and linked to other subjects and curricular areas. In the cross-curricular approach, citizenship education is neither a separate subject or topic, nor is it part of an integrated course, but instead it permeates the entire curriculum and is infused into subjects. Some countries adopt a mixed approach to citizenship education, with a broad integrated approach more prevalent in the primary curriculum, giving way to more specialised citizenship education or civics courses in the secondary curriculum. The fourth point is the mixture of statutory and non-statutory approaches to citizenship education. In some countries it is a statutory part of the core national curriculum, while in others it is non-statutory, with greater freedom left to states, districts, municipalities, schools and teachers. However, the non-statutory nature of provision in some countries means that not all students may encounter citizenship education in their curriculum experience.

The primary curriculum (ages 5 to 11)

Table 1: Organisation of citizenship education in the primary phase

Country	Terminology	Approach	Hours per week
England	Education for Citizenship	Non-statutory Cross-curricular	Schools to decide
Australia New South Wales	Human society and it's environment (HSIE)	Non-statutory Integrated	Not specified
Canada	Social studies	Non-statutory Integrated	Not specified
France	Civics as part of 'Discovering the World'	Statutory core Separate and integrated	4 hours out of 26
Germany	Sachunterricht	Non-statutory Integrated	Not specified
Hungary	People and society	Statutory core Integrated	4 to 7% of curriculum time
Italy	Social sciences	Statutory core Integrated	Not specified
Japan	Social studies, living experience and moral education	Statutory core Separate and integrated	175 x 45 minutes per year
Korea	A disciplined life and moral education	Statutory core Separate	Varies dependent on year
The Netherlands	Social structures and life skills	Statutory core Integrated	80 to 100 hours per year
New Zealand	Social studies	Statutory core Integrated	Not specified
Singapore	Civics and moral education	Statutory core Separate and Integrated	3 x 30 minutes lessons
Spain	Knowledge of the natural, social and cultural environment	Non-statutory Integrated	170 hours per year
Sweden	Social sciences	Non-core Integrated	885 hours over 9 years of compulsory schooling
Switzerland	Social studies	Non-statutory Integrated	Not specified
USA Kentucky	Social studies	Statutory core Integrated	Time specified per week varies among states

The major pattern in the primary curriculum is the organisation of citizenship education through an integrated approach of domains or 'brigades' in many countries. It suggests a deliberate emphasis in the intended curriculum, particularly in the early years of this phase, on the integrated learning of the child's understanding of themselves with respect to topics and aspects. For example, France links civics with sciences, technology, history and geography under the heading 'Discovering the World'. Hungary has eight curricular areas, one of which is 'People and Society', while Spain uses the term 'Knowledge of the natural, social and cultural environment'. Moral education is also an important component of citizenship education in many countries, particularly those in Southeast Asia.

The striking example is that of Korea, which addresses citizenship education through the domain of 'a disciplined life'; an integrated course covering social studies and moral education. Time allocations indicate that moral education features heavily in early education. The same is true for Singapore, where moral education is part of mother tongue teaching, and for Japan. In some countries, the range of the curriculum is extended as the primary phase progresses and there is increased time and focus on citizenship education. In Singapore, for instance, the seven-area curriculum from grade 1 (including civics and moral education) is supplemented by the addition of social studies from grade 4, with subjects increasingly taught through the common medium of English as pupils progress.

The secondary curriculum (ages 11 to 16 or 18)

Table 2: Organisation of citizenship education in the lower and upper secondary phase

Country	Terminology	Approach	Hours per week
England	Education for Citizenship	Non-statutory Cross-curricular	Schools to decide
Australia New South Wales	Human society and it's environment (HSIE)	Non-statutory Integrated	Not specified
Canada	Social studies and also history, law, political sciences and economics	Non-statutory Integrated	Not specified
France	Civics linked to history and geography	Statutory core Separate and integrated	3 to 4 hours out of 26
Germany	Social studies linked to history, geography and economics	Non-statutory Integrated	Not specified
Hungary	People and society with specific social studies, civics and economics courses	Statutory core Integrated and specific	10 to 14% of curriculum time
Italy	Civics linked to history and geography	Statutory core Separate and integrated	4 hours
Japan	Social studies, history, geography and civics and moral education	Statutory core Integrated and specific	175 x 50 minutes per year (Grades 7 & 8) 140 x 50 minutes per year (Grade 9) 140 x 50 minutes per year (Upper secondary)
Korea	Social studies and moral education	Statutory core Integrated and specific	Ranges 170 x 45 minutes to 204 x 45 minutes per year
The Netherlands	Civics and citizenship and social studies	Statutory core Integrated	180 hours over 3 years (age 12 – 15) 2 to 4 hours per week (age 16 – 18)
New Zealand	Social studies	Statutory core Integrated	Not specified
Singapore	Civics and moral education	Statutory core Integrated and specific	2 x 30 minutes lessons
Spain	Civics linked to history, geography and social sciences	Non-statutory Separate and integrated	3 hours per week
Sweden	Social sciences including history, geography and social studies	Non-core Integrated	885 hours over 9 years of compulsory schooling
Switzerland	Social studies	Non-statutory Integrated	Not specified
USA Kentucky	Social studies including civics and government	Statutory core Separate and integrated	Time specified per week varies among states

Citizenship education in the secondary curriculum is still organised through an integrated approach in most countries, but often as a discrete, explicit component alongside other subjects and aspects. The most common approach is through social studies or social sciences courses, where citizenship or civics is closely linked to the subjects of history and geography. For example, in Hungary, the domain is still entitled 'People and Society' but incorporates specific reference to social studies, civics and economics courses. In Japan, in junior high school (age 12+-15), social studies is divided into three subjects; geography, history and civics to be taught from 2002 alongside a new general studies course: and in high school (age 15+-18), social studies is divided into two subjects; civics, and geography and history, where civics is further subdivided into modern society, ethics and politics and economics. In the Netherlands, citizenship education is part of history and civics at lower secondary (age 12 to 15) and is an integral part of social studies (*maatschappijleer*) courses, while in some Canadian provinces, social studies is linked with history, law, political sciences and economics.

In many countries, the range of subjects that relate to citizenship education is extended as the secondary phase progresses, taking in economics, law, commerce and political sciences. Moral education continues to be an important component in some countries, particularly those in Southeast Asia. The other feature of the secondary phase is the increased time given to citizenship education particularly in the upper years of this phase. This reflects the growing maturity of students and their ability to handle complex, topical issues. It is spurred by the proximity of students to the end of their compulsory or post-compulsory period of education and to their entry into the world as full citizens, with legal, political, economic and social rights and responsibilities.

Teaching and Learning Approaches

Key questions for discussion

- *What are the main influences on teaching and learning approaches in citizenship education?*
- *What is the range of teaching and learning approaches in citizenship education?*
- *What is the relationship in citizenship education between classroom practice, whole school approaches and links with parents and wider communities?*
- *To what extent is there a gap between the rhetoric of policy and the reality of practice in citizenship education?*

Influences on teaching and learning approaches in citizenship education

There are many influences on teaching and learning approaches in citizenship education. This point was underlined in the two contrasting presentations at the invitational seminar, which lead off this session. The three major influences on teaching and learning approaches are culture, content and climate. The interplay between them is very complex and subtle but can have profound consequences.

Culture, in particular is broad and pervasive. It ranges from the cultural traditions and norms in a society, to the particular culture of specific groups (such as teachers, parents and students), of organisations (such as schools, government departments and businesses) and of institutions (such as parliaments, courts and churches). Indeed Carole Hahn found in her comparative study of citizenship education that there are significant differences between countries in terms of their pedagogic traditions and cultural norms. It explains why approaches and programmes of citizenship education cannot readily be transported from one country to another and expect to be successful. In some countries there are also differences between the prevailing civic and classroom cultures. This underlines the profound influence that teacher culture and beliefs has on approaches to citizenship education.

Content covers the various components of citizenship education in the formal and hidden curriculum. For example, in Korea this comprises four aspects: work in curriculum subjects; optional activities based around 15 cross-curricular themes; cross-curricular activities and service work. These aspects are identifiable in many countries. Content is vital to effective citizenship education. Research shows that students who take citizenship/civics courses in schools are more knowledgeable about political life (both formal and informal) and therefore more likely to participate in the future. Climate includes the ethos in schools, classrooms and impacts, for example on ability to tackle controversial issues and values with students.

These three main influences impact on policy and practice at three levels. The first level is the general structure and aims of education, including the organisation of schooling. The second level is the organisation of the curriculum, including content and teaching and learning methodologies. The third level is what students experience in schools and the balance between the formal and hidden curriculum and individual classroom and school ethos.

At the first level, the broad contextual and structural factors outlined earlier in this paper clearly have a major influence on teaching and learning approaches. They set the official tone and determine the degree of flexibility

available to schools and teachers as to how they approach citizenship education. As might be expected among 16 countries, there are variations in the scope and nature of that influence. For example, teachers in Germany are obliged by law to teach values. Legally speaking, this commitment is just as important as the teaching of knowledge. However, in conformity with the basic law of educational freedom, teachers are free to choose their own methods. In contrast, teachers in Singapore operate within a tightly controlled framework. Civic and moral education are compulsory throughout primary and secondary education, based on a structured syllabus and prescribed textbooks. This learning is reinforced through service programmes (e.g. voluntary work in welfare homes) and by encouraging students to participate in out-of-school club activities.

Sweden is interesting in the extent to which the school's responsibility for 'inculcating' values associated with citizenship education is explicitly defined in terms of the development of skills and attitudes, as well as the acquisition of knowledge:

As well as being open to different ideas and encouraging expression, the school shall emphasise the importance of forming personal standpoints and provide pupils with opportunities for doing this. By making choices over courses and evaluation of their daily education, pupils will develop their ability to exercise influence and take responsibility.

The school shall actively and consciously further equal rights and opportunities for men and women. The way in which boys and girls are treated and assessed in school, as well as the demands and expectations that are placed on them, contributes to their perception of gender differences. The school has a responsibility to counteract traditional gender roles and shall therefore provide pupils with the opportunity of developing their own abilities and interests irrespective of their sexual identity.

The school must actively resist any tendency towards bullying or persecution and confront xenophobia and intolerance with knowledge, open discussion and effective measures.

All school activity shall be carried out in accordance with fundamental democratic values. It is not in itself sufficient that education imparts knowledge of fundamental democratic values. The school must also use democratic working methods and prepare pupils for active participation in civic life.

The Swedish system also puts great emphasis on the whole school community as a vehicle for learning.

At the second and third levels the role of the teacher, collectively and individually, is crucial. Actual classroom practice is critical to the successful achievement of the aims of citizenship education, whether those aims are the transmission of formal historical and political knowledge and/or the encouragement of active participation among students. Teachers have to strike the right balance between the content being covered, the chosen teaching methodology and the learning environment that ensues.

The power of teachers in determining the learning environment in schools is noted in a number of the case study chapters from the IEA Civics Education Project. The same message was underlined by seminar participants. Teachers are themselves influenced, in their beliefs and actions, by the cultural traditions and norms in a country. This can be both positive and negative. It means that they are generally one or two generations removed from the students they teach. Indeed they often have more in common with parents than with students. This can lead to a gap in some countries between teachers and students, and also between teachers and the prevailing civic culture. The latter occurs particularly where significant and rapid change in policy is attempted. Research shows that the culture of schools and classrooms is very slow to adapt to change. There was clear evidence of this from the seminar presentations. For example, in Switzerland, teachers in the secondary phase view their primary duty in citizenship education as providing information about national history and politics and describing relevant situations in a didactic and non-controversial way. There is little room or encouragement for other approaches in the classroom.

Countries with a tradition of a formal, knowledge-based approach to this area can also find it difficult to change teacher attitudes and opinions. This is the case in Hungary, where official moves to a more discussion-based approach to citizenship issues in classrooms are being frustrated by the deep-seated belief of teachers that

controversial or sensitive issues should be kept out of the classroom. Japan and Korea are encountering similar problems in their official attempts to promote more creativity in schools in what are traditionally conformist and centralist societies. The new teaching and learning approaches which are being encouraged at an official level are viewed as having a western basis which does not fit with what people feel in their hearts. The power and durability of teacher culture should not be underestimated in attempts to review and renew citizenship education. While it may be true that ‘the people will perish without a vision’, it is equally true that ‘the people will perish if they do not share and support the vision’.

Range of teaching and learning approaches in citizenship education

The IEA Civics Education Project national case study chapters highlight the wide range of teaching and learning approaches employed by teachers in covering citizenship education. While a number of countries are still dependent on a passive, didactic, transmission approach as the dominant teaching methodology, there are others who encourage a more interactive, participative approach with room for classroom discussion and debate supported by project and inquiry work, fieldwork, visits and extra-curricular learning. There is evidence in Australian classrooms of structured classroom discussion and debate as the most favoured approach, while in the USA, there are many opportunities for learning through extra-curricular activities and through service learning programmes, national competitions and mock elections. There is an equal range of opportunities available in England through the work of the main citizenship organisations and in the encouragement given to school and class councils.

Some countries have developed specific curriculum programmes which encourage a mixture of approaches to ensure the goals of ‘education FOR citizenship’ are achieved. They include the Civic, Social and Political Education (CPSE) course in the Republic of Ireland, the Junior Citizenship project in England, the Opening the Schools project in Germany and the ‘Discovering Democracy’ initiative in Australia among others, but there are far too many to list here. There is an urgent need to map these curriculum projects where they lead to effective practice and to make this practice more widely available both within and across countries. This would also include reference to what is known from effective practice about how students learn best in citizenship education. There was insufficient time in this thematic study to pursue this issue further. However, a number of seminar participants urged the development of a database of projects and resources in order to provide what one participant termed ‘effective and inspiring examples from actual practice’.

However, it should be noted that, even in countries with curriculum projects and effective practice, it is accepted that there is still tremendous variety in approach from school to school and classroom to classroom. This means that not all students experience all approaches. Indeed, in most countries, citizenship education teaching still proceeds from the use of the textbook as the predominant teaching resource. Structured teacher exposition of textbook passages and follow up opportunities for student discussion and questioning is a very common teaching approach.

Some countries are recognising the need for increased encouragement of active and participatory learning in citizenship education through formal structures and policies. For example, in the Netherlands, there is a move in upper secondary schools to a ‘study house’ concept, where students are encouraged to move away from traditional teaching methods and organise other forms of working. Elsewhere, there are attempts to achieve greater coherence between what students learn in the formal subject curriculum with what they experience through the hidden curriculum. For example, in Sweden, schools must use democratic working methods with teachers and students deciding in advance the learning goals in each subject. Meanwhile, the province of Ontario in Canada has recently redefined the word ‘curriculum’ to include all the learning experiences that students have in school.

There are also opportunities in some countries for students to learn about democracy through active participation in school life. In Spain, there are school councils comprising teacher representatives, parents and students that decide, among other things, on curriculum plans, finances and student behaviour. The current reform of the lycée in France aims to give students more say in how their education is conducted, while in England there is growing support for school and/or class councils in every school. However, not all countries have such opportunities. In Australia school representative councils and youth parliaments are rare. There is a distinct lack of such developments in Hungary, while in others, notably Italy, their existence does not mean they function satisfactorily. It is important to note that such opportunities are often open to only a small percentage of students in a school.

Gap between policy and practice in citizenship education

To a degree, practice often lags behind policy in all areas of education. The issues in citizenship education are the size of the gap, how far is it an accepted part of the education system, and what, if anything, is being done to address it where it exists. The gap between policy and practice can exist at many levels, from national policy all the way to policy and practice within an individual school. Indeed, Kennedy (1997) has suggested that the loftier a country's ideals for citizenship education, the less likely it is to have any meaningful practice. As already mentioned, a gap can appear where national policy is attempting to bring a significant shift in teacher attitude and classroom practice in a relatively short period of time. This is the case currently in Hungary, Japan and Korea, with the shift in central policy to encourage more discursive and creative elements in schools. It may well take a generation before new teachers, comfortable with the changed emphasis in practice, begin to close the gap in these countries. Indeed, there is tacit acceptance of this in Korea, where the compulsory retirement age for teachers has been reduced from 65 to 62 in an attempt to increase the number of younger teachers employed in schools.

In other countries, there is a gap which is accepted as part of the system. For example, in Italy, there is a marked contrast for students between the open, participative climate within the hidden curriculum in schools, and the non-participatory climate in the formal curriculum in the classroom. A similar situation exists in Germany, but in reverse. The hidden curriculum in German schools, with its strong emphasis on 'studying for tests' and 'conforming to authority', has a powerful influence on the formal curriculum. Meanwhile, in Canada, it is recognised that actual practice in many provinces is much more conservative and traditional than official policy mandates.

However, these observations should be tempered by a recognition that one of the key points to emerge from the literature in this area is that we have only a limited knowledge and understanding of what actually happens in citizenship education in schools, both in classrooms and elsewhere. Little systematic research has been conducted since the 1970s. Though the research base is growing rapidly with the renewed interest in citizenship education in many countries, it will take some time before research findings and examples of effective practice filter through at international, national, school and classroom level.

Teacher specialisation and teacher training

Key questions for discussion

- *Are teachers of citizenship education specialists or generalists?*
- *Is there any specific initial or in-service training for citizenship education?*
- *How well prepared are teachers to teach citizenship education?*

Specialist or generalist teachers of citizenship education

Practice in whether pupils are taught citizenship education by generalists or specialists is generally consistent, with pupils in the primary phase being taught by generalists and those in the lower and upper secondary phases being taught by specialists. The only variations concern the degree to which older primary pupils receive some

specialist teaching and whether lower secondary pupils receive any teaching from generalists. For example, in Sweden, teachers in years 0 to 7 (students aged 6/7 – 13+) are generalists, but can choose to specialise in social sciences.

While the general picture is one of consensus between countries on the use of generalists to teach citizenship education in the primary school, with increasing teacher specialisation thereafter, the reasons for this are not totally clear. The economics and practicalities of having specialist teaching of citizenship education in the primary school may account for the dominance of generalist teachers, particularly in areas where many primary schools are small. Similarly, educational considerations concerning the centrality of the relationship between teacher and pupil in this phase may be an important factor.

However, it is also important to qualify what is meant by the term ‘specialist teacher’ in the context of citizenship education. In many countries, those who teach citizenship education in the lower secondary, and to a lesser degree upper secondary, phase are specialists either in a number of subjects closely related to and including citizenship education, or in a closely related subject. They are not specialists in citizenship education *per se*, but may teach it alongside their responsibilities as a teacher of social sciences or social studies, or as a teacher of history or geography. This raises the issue of the extent to which these teachers prioritise their citizenship education teaching over their other teaching duties. Are they primarily, for example, a history teacher who does a bit of citizenship education to make up a teaching timetable, or a citizenship education specialist who also contributes to other subjects? Most teachers defined as specialist citizenship education teachers have a background in history or the social sciences through qualifications and experience, and this may determine where their loyalties lie.

Initial and in-service training for citizenship education

In most countries, there is no specific initial and in-service training of teachers for citizenship education. Many teachers are trained in closely related subject areas, notably history, geography and social sciences (often at degree level, in countries with a mainly graduate teaching profession) and follow this with some training in education, where they learn about teaching methodologies. In Hungary, some universities are beginning to introduce specific initial training courses for citizenship education, but it is difficult as there is, as yet, no tradition for training for civics and social studies. Seminar participants were united in their call for more resources for teacher training for citizenship education. However, they recognised that resources were used best where training was founded on a shared definition of citizenship and a clear idea of what teachers had to do and how they had to do it. It was much easier for this to happen in those countries with a ‘values-explicit’ approach to citizenship education. To carry on the maxim of ‘the people will perish without a vision’, the people not only require a vision which they share but they also need to be properly trained to turn that vision into effective practice.

In-service training for teachers of citizenship education already in schools is also very patchy. In the USA, for example, a number of social science bodies offer specific in-service training courses for this area, but they can reach only a limited number of teachers across all the states. However, a number of countries recognise the need to back up curriculum reforms and initiatives with accompanying support materials and professional development for teachers. This is the case in Southeast Asian countries such as Singapore and Japan. Meanwhile, in New Zealand, the Ministry of Education has introduced a programme of professional development for teachers to ensure they are able to teach the new social studies this curriculum was published and distributed to schools in 1998 and will become compulsory from 2000. In Australia the ‘Discovering Democracy’ initiative is also supported by a professional development component, funded by the federal government. A number of countries were pioneering the use of ‘expert’ or ‘master’ teachers, employed alongside teacher educators from universities, to train other teachers because of the relevance of their highly developed classroom practice. This partnership model worked well.

Preparation of teachers for citizenship education

A number of countries involved in the IEA Civics Education Project have commented on the inadequacy of the preparation of teachers to handle citizenship education in the school curriculum. This inadequacy relates not only to a lack of teacher content knowledge but also to an inability to employ a range of teaching and learning approaches appropriate for citizenship education. The generalist nature of the training of teachers in the primary phase presents its own difficulties concerning citizenship education, particularly where, as in the USA, teachers are trained in education rather than social studies, history and geography. However, many of the comments relate to the lower and upper secondary phase. There was some debate in the invitational seminar as to whether teachers who teach citizenship education are lacking appropriate pedagogical techniques and/or an understanding of the central concepts, which underpin citizenship education. Opinion remained divided, though there was general agreement that, whatever the form of training, there was a need for teachers to reflect on their own practice in order to improve it.

A number of countries referred to the inadequacy of a university degree as preparation for the day-to-day demands of citizenship education teaching. This is in terms of degree content and the style of teaching during the course. This problem is noted in Germany, as well as in Italy. There is also a question mark concerning the appropriateness of a degree in history, geography or social sciences as an adequate preparation for the teaching of citizenship education. The role of teachers' personal, political and education experiences is also highlighted. This can be both positive and negative. For example, in the USA a study of social studies teachers using focus groups reported a reliance on their personal experiences in teaching citizenship education issues rather than on any degree knowledge or in-service training programme. However, in Italy there are concerns that teachers cannot fully develop a participative approach to citizenship education because of deficiencies in their own civic and political experiences. The same concerns are apparent in Germany, where an ageing teaching profession, coloured by particular post-war experiences, is having a considerable influence on expectations about, and approaches to, citizenship education. This again underlines the powerful role of teacher beliefs on classroom practice in citizenship education.

In the majority of countries there are limited opportunities for professional collaboration between teachers and schools and little sharing and discussion of materials and approaches. However, in Spain, curriculum plans are drawn up by teams of teachers in each school, while in France, there are attempts to encourage a team approach to civics in the lower and upper secondary phase, through a time allocation each week for meetings of teaching teams in every school. Meanwhile, in Singapore clusters of schools share good practice.

Use of textbooks and other resources

Key questions for discussion

- *What are the main resources for teaching citizenship education?*
- *What is the balance between national, local, official and commercial resources?*
- *How far do textbooks and other resources influence approaches?*

Resources for teaching citizenship education

Textbooks are the major resource underpinning the teaching of citizenship education in most countries. They play an important role in determining the approach of teachers and consequently in shaping the curriculum experiences of citizenship education of students. This is particularly apparent in the primary phase, since teachers are usually generalists, rather than citizenship education specialists.

Given this reliance, it is no surprise to find differences between countries concerning mechanisms for the approval and production of textbooks and other resources. Practice as to whether textbooks are produced, or have to be approved by, national or local (Education) Ministries again varies between countries. In England, Italy, the Netherlands, New Zealand, Australia and Sweden there is no system for the official approval of

textbooks. Countries where approval is required are France, Japan, Korea, Singapore, most Canadian provinces, Germany, most Swiss Cantons and 21 out of the 50 states in the USA. Textbooks are generally approved in Hungary, although this situation is under review, while in Spain, they are produced under the supervision of the Ministry.

Where there is an official approval system, this involves checking that the prescribed curriculum is being followed. In France, textbooks must indicate which class and level they are intended for on the cover or title page. Japan uses a Textbook Authorisation and Research Council to recommend textbooks to the Minister, comprising university and schoolteachers. Korean textbooks fall into three types: those produced by the Ministry, authorised textbooks (authorised by the Ministry) and recognised textbooks (approved by the regional superintendent in each metropolitan or provincial area), and consequently provide an interesting example of co-existence.

In Spain, teaching materials must be consistent with the aims, content, teaching methods and assessment criteria in the relevant legislation. They must also indicate the level, stage, cycle or school year for which they are intended. In Canada, materials produced by provinces are normally piloted before receiving official sanction. Private sector materials are usually subject to an approval process involving the Ministry. The trend here is away from a single textbook to a variety from which to choose.

In Germany, books must be in line with the principles of the Constitution and Education Acts, compatible with the syllabus and with research findings, adequately bound and, interestingly, the price must be justified. Hungary examines content, technical quality and, again, price. In Singapore, textbooks must adhere to the syllabus, give comprehensive coverage of the topics in the syllabus, adopt a clear and logical presentation of concepts and offer activities to enhance the learning experiences of pupils. However, they are deliberately written by curriculum specialists rather than publishers. Swiss Cantons have the authority to authorise or prescribe textbooks. In the USA, practice varies by state. About half of the states recommend textbooks and have a state textbook adoption programme.

The general tendency is for books to be part of a series with one book per year or grade level. In Korea, the primary texts are based on semesters, thus leading to two books per year. Italy is unusual in that its primary textbooks cover a range of subjects, mathematics, science, history, geography and social sciences in the same book. Clearly, where there is an official approval system, this can influence the approach that schools and teachers take to citizenship education. It suggests a certain direction and may suppress the confidence and ability of the teacher to adapt and improvise.

Indeed seminar participants were concerned about the undue influence of textbooks on teaching and learning approaches. Textbooks generally cover the knowledge component of citizenship education (the 'education ABOUT citizenship' strand) rather than the more active 'education THROUGH' and 'education FOR' strands. Over-reliance on textbooks can stifle the other two strands and turn students off citizenship education, particularly where textbooks are out-of-date and full of gaps.

However, there is a move in some countries to expand the range of resources available to teachers and schools to support citizenship education. This is in line with the wide range and form of material available to support citizenship education, particularly through the growing influence of information and communications technologies (ICT) in schools and society. Indeed the challenge in many countries is to adapt materials in a form which best suits the need of busy teachers. This widening of resources is particularly noticeable in countries involved in curriculum reforms and initiatives, which seek to support and/or broaden teacher and classroom practice. For example, in France, teachers' manuals are produced alongside textbooks, while in Korea, the Ministry of Education's 'Education Broadcasting System' includes a television and radio station, which produces programmes on social education, environmental education, culture and Korean unification. The Ministry of Education in New Zealand, likewise, runs an on-line telecommunications network linked to schools. It also produces high quality curriculum resource materials, developed by a national 'Learning Media' organisation. These are distributed free to all schools. In Singapore at primary level, the Ministry of Education produces an instructional package which includes textbooks, workbooks, a teachers guide and audio-visual

materials for each year / grade. At secondary level, the instructional package consists of the workbooks, a teachers guide and audio-visual materials (the workbooks also serve as textbooks). Meanwhile in the Republic of Ireland the main newspaper produces a special weekly edition of current issues and news stories for use in schools. There is insufficient information currently available to determine the effectiveness of these various initiatives on teaching and learning approaches in citizenship education.

Assessment arrangements

Key questions for discussion

- *What are the assessment arrangements for citizenship education?*
- *What is the balance between national and local assessment in citizenship education?*
- *What are the purposes of assessment in citizenship education?*
- *What impact, if any, does assessment have on teaching and learning approaches?*

Assessment arrangements for citizenship education

Assessment arrangements for citizenship education show considerable variation across countries, depending on the formal assessment arrangements in operation, attitudes to the purposes of assessment and the particular phase involved. For example, all of the countries with a centralised government and education system have some sort of formal, though not always compulsory, assessment arrangements. Singapore and Italy have compulsory primary school leaving examinations, but these do not involve an assessment of citizenship education. Italy also has a lower secondary school leaving examination at age 14, which includes an oral combined test for civics, history and geography. Indeed, citizenship education is more likely to be part of a formal assessment system in the lower and upper secondary phases because of the way those phases are organised in many countries around formal examination qualifications such as the *baccalauréat* in France and the General Certificate of Secondary Education (GCSE) and General Certificate of Education Advanced 'A' Levels in England.

Beyond these, the purpose of the assessment affects the structure adopted. Sweden has national tests for students aged 12 and these illustrate that perceptions of purpose may differ. The Government sees the role of these tests as supporting teachers and influencing the allocation of funding to pupils who do not pass, while the National Agency for Education (*Skolverket*) stresses diagnosis for the individual pupil and encouraging reflection on teaching by the teacher. There are also concerns in Sweden about tests influencing the curriculum and the use of item banks to provide tests is seen as a solution. Some of the development work on these is being carried out in co-operation with other Scandinavian countries.

Periodic surveys are used to assess the state of citizenship education in several countries, including Hungary, the USA and the Netherlands. The 1998 National Assessment of Educational Progress (NEAP) in the USA looked at civics and government in a representative sample of schools, based on the voluntary national standards for civics and government. The results should be made public at the end of 1999. Other countries favouring this approach include Korea (at ages ten to 12) and Spain (at age 12). New Zealand has recently set up the National Educational Monitoring Project (NEMP), while the federal government in Australia has announced a baseline survey of student knowledge in civics or citizenship education as part of the 'Discovering Democracy' initiative. Meanwhile, in the Netherlands the National Institute for Educational Measurement (CITO) selects a representative sample of primary schools each year to evaluate pupils' progress in different school subjects, including social structures and life skills. Two-thirds of pupils in the Netherlands also take a voluntary test at the end of the primary schooling, which among other things assesses their knowledge of world studies.

Surveys sometimes involve sampling of pupils, as formerly carried out in England by the Assessment of Performance Unit (APU), which assessed a sample of 2.5 per cent of the chosen age group, and currently by the National Assessment of Educational Progress (NAEP) in the USA. For national surveys, samples of around two to three per cent often suffice. Larger samples may be needed if a representative picture of performance in different regions is required.

The issue of whether it is possible or desirable to make assessments mandatory in all subjects and for all schools is an important one. New Zealand has set up optional testing from nationally developed item banks in mathematics, science and English. The aim is to increase teacher confidence in assessing student achievement against the learning outcomes in the National Curriculum statements for those subjects. These item or resource banks are available to those teaching students approaching points of transition in the education system. No decision has yet been made as to whether to set up an item bank for social studies. Meanwhile in Sweden, assessment at age 12 is mandatory for public schools but not for private ones.

These variations reflect differences both in education systems and in the view taken on the prime purpose of the assessment. Is the prime purpose of assessment to help inform future teaching, or is it to monitor the state of citizenship education performance, or to monitor the performance of individual schools, and so on? Other concerns may result in the absence of formal assessment arrangements. In Switzerland, for example, there are concerns that measuring a process might help to destroy it, but lack of measurement may also mean that the process is not taken seriously by teachers and students.

Most of the International Review Project countries have a mixture of summative and formative assessment arrangements in citizenship education. Continuous student assessment is the responsibility of the individual class teacher in many countries, with formative assessment introduced at a number of natural end points across the school year, often the middle or end of terms. These sometimes coincide with points of transition and exit in the school system, where formative assessment may be part of more formal national procedures. Summative assessment comprises a number of components, including student performance in class tests, the standard of a student's written work and his/her oral contribution in lessons. Indeed, in Sweden, in most grades, schools are free to report on student progress in terms of their creativity, personal conduct and ability to co-operate.

The purposes of assessment are varied. Assessment often helps to inform the teacher and the individual student and may also include some reporting to parents. In Sweden, for example, regular oral and written reports are made to parents, while in Spain, written reports are made to parents every three months. However, assessments may also be increasingly used to monitor the state of citizenship education performance. A number of countries are moving in this direction, through the establishment of national standards for all subjects, with accompanying statements, learning outcomes and testing instruments. This is the case in New Zealand, Sweden and in some Australian and American states. For example, the states of New South Wales and Victoria in Australia are to begin to formally assess civics with history and geography for Year 10 students. Meanwhile in the US state of Kentucky, 57 'Student Academic Expectations' define what students should be able to know and do in five major content areas, including social studies. The social studies expectations stated as learning outcomes, include students' demonstrating effectiveness in community service. There are similar developments afoot in Maryland and Wisconsin.

However, it is vital to give careful consideration to the purpose of assessment in citizenship education and its impact on teaching and learning approaches. Seminar participants saw clarity of purpose as the crucial issue concerning assessment arrangements for citizenship education. What was being assessed, how and for what purpose needed careful consideration. Some participants called for an in-depth discussion of the relationship between citizenship education and assessment, and for assessment issues to be a more explicit part of teacher training. They felt that this was long overdue. In some countries, citizenship was only taken seriously as a recognised and valued part of the curriculum when it became an examination subject. This was the case in the Netherlands with the use of end of year written exams at national school level alongside assessment of practical or experiential components (often in project form). There may be a need for more formal, written examinations as part of the assessment of citizenship education in order to raise its status in the curriculum. However, in some countries, the formal assessment system has a negative influence, both direct and indirect, on citizenship education. For example, in Japan, the senior high school entrance exam, which include social studies, encourages 'teaching to the test'. The same phenomenon is noted in Germany. In Australia, however, the pressure to report on student performance in the Year 12 public examinations is one factor in inhibiting the introduction of citizenship education as a discrete curriculum component.

Finally, it is important, when discussing assessment, to bear in mind the point made by Graham Ruddock in the previous thematic study *Mathematics Education in the School Curriculum: an International Perspective* (QCA, 1998). He gave a reminder that the degree to which assessments can serve more than one purpose has always been a contentious issue. Some aspects of the discussion are technical and systems (as in England) which emphasise results at the school level can also produce a national or regional picture by aggregating school results. More arguable is the degree to which assessment systems can successfully combine summative and formative/diagnostic purposes. A commonly held view is that assessment cannot be expected to meet more than one objective properly, but that summative tests can be used to provide some diagnostic information as a secondary purpose.

Current and future developments

Key questions for discussion

- *What is the current position of citizenship education in the school curriculum?*
- *What are the challenges in citizenship education?*
- *What is meant by 'effective citizenship education'?*
- *Is there any attempt to measure the impact of citizenship education on student attitudes and actions?*

Current position of citizenship education in the school curriculum

In a comparative study of 16 countries, there are bound to be variations in the position of citizenship education in the school curriculum. However, looking across the countries as a whole, the general position of citizenship education is a healthy one, in that it is a recognised and accepted part of the school curriculum in the majority of International Review Project countries. The only exceptions are England, and to a lesser extent Australia, where it has yet to establish a firm hold in the curriculum and Canada, where reforms threaten to severely weaken its curriculum status and position.

Developments in the near future also offer hope. Citizenship education is part of the major reforms of the curriculum currently underway in Spain, France, Hungary, Italy, New Zealand and the Netherlands. It is subject to a change of official emphasis in Japan, Korea and Singapore, as a vehicle for the introduction of more creativity, debate and discussion into the curriculum. The situation is relatively stable in Germany, Switzerland and the USA, with some interesting developments concerning the establishment of standards for citizenship education in a number of US states. Meanwhile, there are promising developments in those countries where citizenship education has yet to take a hold in the curriculum. In England serious consideration is being given to the introduction of citizenship education as a discrete component in the revised National Curriculum from September 2000 while in Australia the federal government is attempting to increase the status and take-up of

citizenship education across the states and territories. Only in Canada is there cause for concern where citizenship education is being marginalised in many provinces by the national emphasis in education on technology, mathematics and science.

Challenges in citizenship education

Many of the current and future challenges facing citizenship education have already been highlighted in the previous sections of this paper. Indeed, a useful way of reading this thematic study is to draw up a list of the common challenges highlighted and gauge the extent to which they match your experience and that of the country you represent. How universal are the common challenges set out here?

The main challenges for citizenship education are to:

- achieve a clear definition and approach
- secure its position and status in the curriculum
- address teacher preparedness and teacher training
- increase the range of appropriate teaching and learning approaches
- improve the quality and range of resources
- decide on appropriate assessment arrangements
- develop and disseminate more widely effective practice
- influence the attitudes of young people.

What is clear is that many of these challenges are interrelated. As countries reconsider and revise their approach to citizenship education, in order to meet the impact of global change, there is a need to consider citizenship education as a whole package. This means not only examining definition, aims and approach, but also ensuring that the curriculum that is drawn up and the curriculum that students experience support the overall aims and approach. For this to happen, more consideration has to be given to the educative process, to teaching and learning approaches, to support structures and to the needs of teachers and students in terms of training, resources and attitudes. There also has to be much deeper thinking about what is meant by 'effective citizenship education'. It is quick and easy to state as a defining aim of education but difficult, messy and time consuming to achieve and sustain in practice.

One of the difficulties facing citizenship education is how to keep up with the incredible pace and impact of change in modern societies at all levels and the implications of such change for groups and individuals in society. As Kennedy (1997) reminds us, this is perhaps the major challenge facing citizenship education, namely how to balance global citizenship issues with national developments and with the realities of life in modern society as experienced by young people. There is growing concern in many countries about the attitudes of young people and, in particular, with the signs of their increasing lack of interest and non-participation in public and political life. Effective citizenship education in schools is seen as crucial to addressing this concern. However, there remains considerable debate as to what is meant by the term 'effective' and how it can best be measured.

Measuring the effectiveness of citizenship education

Despite increased interest in citizenship education in many countries, the knowledge and research base (including examples of effective practice) underpinning this area is still patchy. There has been limited research carried out during the past 20 years on policy and practice and on what influences the attitudes and actions of young people in this area. However, the increased interest in citizenship education across the world is beginning to produce initiatives and projects at both national and international level, which have the capacity to enhance greatly our understanding of this area. At national level, there are initiatives underway in a number of states in Australia and USA, which seek to establish agreed standards and learning goals for citizenship education, and promise baseline information on the attitudes and opinions of young people. The availability of the information later this year from the National Assessment of Education Programme on students' knowledge of civics and government in a representative sample of schools in the USA, should be of particular interest.

Innovative approaches and programmes of citizenship education are also being developed and implemented in many countries. These deserve wider recognition and the increased dissemination of the outcomes.

Meanwhile, at international level the IEA Civics Education Project, involving 28 countries has entered its second phase, with the outcomes of the first phase just published. The project promises to have a major impact on our understanding and on policy and practice in this area across the world, particularly when the findings of the second phase are made public in 2002. There are also a number of comparative studies by individual researchers which will add to our knowledge base. It is hoped that the process of conducting this thematic study, particularly the proceedings of the invitational seminar and this paper, will also, in its small way, add to our knowledge and understanding of this complex and important area.

Conclusions

This thematic study has confirmed a number of the general conclusions from the earlier thematic studies. However, it has also raised specific issues concerning citizenship education, and provided some pointers to effective practice, which require more detailed consideration. The study has reiterated the power of reviewing curriculum and assessment frameworks in the *INCA* 'Archive' with representatives from the relevant countries. The invitational seminar is central to this review process and helps to:

- understand the unstated values and aims underlying the curriculum and any planned reforms;
- challenge stereotypical expectations or assumptions about the meaning of words or concepts;
- avoid sweeping generalisations about policy and practice in countries
- gain an insight into perceptions of the strengths and weaknesses of other education systems
- tackle perceptions of the strengths and weaknesses of the education system in England.

The study has further demonstrated the importance of avoiding superficial solutions to education reform and of carefully examining alternative approaches to issues within the context of other countries' implicit and explicit values and educational aims, structures and curriculum and assessment arrangements. Such links are often complex and subtle but they are always significant. They help to explain the commonality and diversity of educational provision in the 16 International Review Project countries.

The study has found, with reference to citizenship education:

- the topical nature of citizenship education and the breadth, depth and complexity of the issues it addresses. The area is under review with planned revisions in most International Review countries, as part of the overall reform of the school curriculum;
- the important role of context and culture in understanding aims and approaches to citizenship education. What works in one cultural context cannot simply be adopted and expected to achieve the same ends somewhere else. It requires careful adaptation to suit the new cultural context;
- broad agreement among countries on the common challenges facing citizenship education, even if national responses to those challenges vary;
- a recognition that the explicit statement of shared values underpinning citizenship education can make a difference to policy and practice and may make a difference to outcomes. Those countries with a 'values-explicit' tradition are better able to set out the aims and goals of citizenship education (policy), how those are to be delivered (practice) and what the end results should be (outcomes) than those countries with a 'values-neutral' tradition. However, it should be noted that clarity of aims does not guarantee successful outcomes;
- a move in many countries away from a narrow, knowledge-based approach to citizenship education, to a broader approach encompassing knowledge and understanding, active experiences and the development of student values, dispositions, skills and aptitudes. However, this transition was proving difficult to manage because of the impact, in particular, of teacher culture and beliefs and the slow adaptation of schools to change;

- the continuing gap between the rhetoric of policy and the reality of practice in many contexts, from a national level to individual schools and classrooms. There is still a long way to go to ensure that effective practice in citizenship education is developed and sustained within and across countries;
- agreement on the centrality of the teacher in citizenship education and on the need for better targeted training for teachers and the development of a broader range of teacher-friendly resources;
- the need for further discussion about assessment arrangements for citizenship education and the importance of clarity of purpose when deciding what arrangements to make. There was a growing debate in some countries about the desirability of terminal, written exams for citizenship education, as part of compulsory, national assessment systems, and their balance with other types of assessment;
- calls for the urgent co-ordination and dissemination of approaches, programmes and initiatives in citizenship education which are developing effective practice. This could be effected through the establishment of a citizenship education database within each country and across countries. The invitational seminar highlighted the potential for such a database.

What the thematic study has shown, above all, is the commonality of interest, challenge and approach to citizenship education across countries. This came through very strongly in the invitational seminar. Once you get beyond the differences in context and in curriculum and assessment frameworks countries have much more in common concerning citizenship education than they think. Awareness of and in-depth analysis of this commonality is the key to developing more co-ordinated and effective policy and practice in citizenship education. Indeed, active and participatory citizenship requires active and participatory dialogue between all those with an interest in citizenship education – researchers, teachers, policy makers, curriculum designers, government officials, parents and students.

It is to be hoped that this central message will live on beyond this thematic study. There is no reason why the process of dialogue and exchange of information and ideas should be limited to the 16 International Review Project countries. Though some countries are further along the road to securing effective practice in citizenship education, the evolutionary nature of citizenship means that there is still far to go and much to learn along the way. It is perhaps fitting to end this study with the final contribution to the invitational seminar from the Canadian representative.

‘We know enough about how students learn in citizenship education to put in place programmes which are based on the growing research and practice base. We need to draw out what this research and practice base tells us and then create a partnership with policy makers and curriculum designers’.

This spirit of partnership is surely the best way to respond to the current challenges in citizenship education. This sentiment also applies to the review of curriculum and assessment frameworks, to which this thematic study is a contribution.

Appendix 1 Sources

The main sources for this study were:

- Material from *INCA*, the Archive of the International Review of Curriculum and Assessment Frameworks Project on 16 countries;
O'DONNELL, S., LE MÉTAIS, J., BOYD, S. and TABBERER, R. (1998). *INCA: The International Review of Curriculum and Assessment Frameworks Archive* [CD-ROM]. Second edn. London: Qualification and Curriculum Authority. Also available on-line at: <http://www.inca.org.uk>
- Material from the IEA Civics Education Project Phase 1;
TORNEY-PURTA, J., SCHWILLW, J. and AMADEO, J-A (Eds) (1999) *Civic Education Across Countries: 24 Case studies from the IEA Civic Education Project*. Amsterdam: Eburon Publishers for the International Association for the Evaluation of Educational Achievement (IEA).
- Information and news from national co-ordinators at the IEA Civics Education Project Phase 2 meeting, in Berlin November 1998;
- Information from official Ministry of Education websites for many *INCA* countries;
- Published sources on citizenship education and the school curriculum;
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Appendix 2 Outline of the education systems in the 16 countries studied

	Eng	<i>Aust</i>	<i>Can</i>	Fran	<i>Germ</i>	Hung	Italy	Japan	Korea	Neth	NZ	Sing	Spain	Swed	<i>Switz</i>	<i>USA</i>
<i>Compulsory education</i>																
Starting age	5	<i>5/6</i>	<i>6</i>	6	<i>6</i>	6 ³	6	6	6	5	6	6	6	7 ⁸	<i>6</i>	<i>6/7</i>
Minimum school leaving age	16	<i>15/16</i>	<i>15/16</i>	16 ¹	<i>18²</i>	16 ⁴	14+	15	15	16 ⁶	16	16	16	16	<i>15</i>	<i>16</i>
Duration in years	11	<i>10/11</i>	<i>9-10</i>	10	<i>10 FT +2 PT</i>	11	8	9	9	10 FT +2 PT	10	10 ⁷	10	9	9	<i>10</i>
<i>Educational phases (not necessarily involving transfer from one school to another)</i>																
Pre-school	2-5	<i>3-5</i>	<i>5</i>	3-6	<i>3-6</i>	3-6 5 comp	3-6	3-6	3-6	4-5	3-5	3-6	0-6	0-7	<i>0-6</i>	<i>3-6</i>
Primary/basic	5-11	<i>5/6 to 12/13</i>	<i>5 to 12/13</i>	6-11	<i>6 to 10/12</i>	6 to 10/14	6-11	6-12	6-12	5-12	5-12	6-12	6-12	7-16	<i>6 to 10/12</i>	<i>5-13</i>
Lower secondary	11-16	<i>12/13-15/16</i>	<i>12/13 - 17/18</i>	11-15	<i>10/12 to 16</i>	10/14- to 16	11-14	12-15	12-15 ⁵	12-15	12-16	12 to 15/16	12-16	7-16	<i>10/12 - 15/16</i>	<i>14-16</i>
Upper secondary	16-18	<i>15/16 to 18</i>	<i>17-18+</i>	15-18	<i>16 to 18/19</i>	16-18	14-18	15-18	15-18	15 to 16/18	16-18	16/17-18-20	16-18	16-18	<i>16-18/19</i>	<i>16-18</i>
	Eng	<i>Aust</i>	<i>Can</i>	Fran	<i>Germ</i>	Hung	Italy	Japan	Korea	Neth	NZ	Sing	Spain	Swed	<i>Switz</i>	<i>USA</i>

Ages overlap as categories show the age of most pupils at start and end of each school phase.

The countries in *italics* are those with devolved responsibility for education. The information provided, particularly for these countries, may not apply to all regions

Appendix 3 National education aims

Educational aims, purposes, goals and principles, as stated in source documents consulted for *INCA*.

	Eng	Aust	Can	Fran	Germ	Hung	Italy	Japan	Korea	Neth	NZ	Sing	Spain	Swed	Switz	USA
																9

9 **USA:** Although education is the responsibility of individual States, the United States Congress has enacted legislation, including the *Goals 2000: Educate America Act*.

1 **France:** Most students complete lower secondary education at 15 and are consequently required to continue into upper secondary education until they are aged 16.

2 **Germany:** Students must complete at least nine to ten years of full-time education followed by two to three years of part-time education.

3 **Hungary:** But attendance in pre-compulsory education at age five is also compulsory.

4 **Hungary:** There is a proposal to extend this to age 18 from 1998.

5 **Korea:** The first cycle of secondary education (age 12-15) is gradually becoming compulsory throughout the country. Post-compulsory schools (15-18) charge fees.

6 **Netherlands:** Full-time from age five to 17 OR full-time from five to 16 plus two years' part-time education. After age 16, school fees become payable on a means-tested basis.

7 **Singapore:** The average of ten years' formal general education is *universal but not compulsory*

8 **Sweden:** There are proposals to extend the starting age to six for all students from September 1998.

Excellence	X	X	X						X		X	X				X
Individual development	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Social development	X	X	X				X	X	X	X	X	X		X	X	X
Personal qualities	X	X	X				X	X		X	X	X	X	X	X	
Equal opportunity	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X
National economy	X	X	X			X	X	X	X		X	X	X			X
Preparation for work	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X
Basic skills	X	X	X				X	X	X	X	X	X	X	X	X	X
Foundation for further education	X	X	X	X	X		X		X	X	X	X	X		X	
Knowledge/skills/understanding	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X
Citizenship/community/democracy	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Cultural heritage/literacy		X	X				X	X	X	X	X	X	X	X		
Creativity		X	X				X	X	X	X		X				
Environment		X	X						X			X				
Health/physical/leisure		X	X				X	X	X	X		X	X	X		
Lifelong education		X	X						X		X	X		X		
Parental participation		X	X				X				X	X		X	X	X
	Eng	Aust	Can	Fran	Germ	Hung	Italy	Japan	Korea	Neth	NZ	Sing	Spain	Swed	Switz	USA