JSSE

Journal of Social Science Education

2022, Vol. 21(4)

Edited by:

Tilman Grammes, Reinhold Hedtke, Jan Löfström

Country Report

Citizenship education in the United Kingdom: Comparing England, Northern Ireland, Scotland and Wales

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Keywords: citizenship education, curriculum policy, curriculum enactment

Highlights:

- Comparative analysis across the UK to provide insights into different curriculum models.
- Contextualised account of how citizenship education is defined and implemented.

Purpose: In this country case study the authors undertake a comparative analysis of citizenship education across the four nations of the UK. The curriculum and contexts in England, Scotland, Wales and Northern Ireland are first described. Then the article considers how each national example engages with fundamental expectations of citizenship education, specifically in relation to questions of citizenship status and the relationship between citizens and the state; political identity; and active citizenship processes.

Approach: Drawing on the authors' collective experience and insights into policy and practice in each nation, we started with a 'generative conversation' to identify key issues for inclusion in this case study.

Findings: The article unearths a variety of constraints and problems, and situates these in a broader policyscape in which policy accretion and policy approximation generate a permissive culture, which has undermined the promise of citizenship education as an entitlement for all young people.

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Suggested citation:
Jerome, L., Sant, E., Britton, A., Emerson, L., James, S., & Milliken, M. (2022). Citizenship Education in the United Kingdom: Comparing England, Northern Ireland, Scotland and Wales. *Journal of Social Science Education 21(4).* https://doi.org/10.11576/jsse-5853

Declaration of conflicts of interests: No potential conflict of interest was reported by the authors.

1 INTRODUCTION

In previous country case studies (e.g. Kerr, 2003; Davies & Chong, 2016) authors have focused on educational policy, practice, and research in one of the four nations of the UK (Wales, Scotland, Northern Ireland, or England). This approach has been understandable because, after different stages of 'devolution', greater levels of self-government have been granted to three of the four nations (Wales, Scotland, and Northern Ireland) and educational policy is entirely decentralised. However, in this report we have attempted to do something rather different and have co-written a case study from a UK perspective, offering comparative insights across the four nations. In order to achieve this the writing team includes contributors from each of the four nations.

Our starting point was that a conversation between contributors who were extensively involved in citizenship education in each context would stimulate a comparative analysis, and that this approach would generate insights into how the subject is constructed in different contexts and across the UK as a whole. Because we relied on each other's expertise and experience it is appropriate to share some details of our experience to clarify our own 'locus of enunciation' (Mignolo, 1995). Britton works in a senior policy role in Scottish education, having previously worked as an academic with specialisms in citizenship education and policy, and as a practitioner in secondary teaching of Modern Studies (which will be considered as a particular subject in Scotland below). His contribution here is in a personal capacity. Emerson has been a teacher and a teacher educator in Northern Ireland where she was instrumental in preparing teachers for the introduction of citizenship into the school curriculum. Her research has focused on two major themes: (i) children's rights and (ii) critical pedagogical and deliberative approaches to teaching controversial issues, particularly with regard to political education and citizenship education. She has undertaken work on the impact of engaging post-primary students with political ex-prisoners to learn about the Troubles and Northern Irish politics (Emerson, Orr & Connolly, 2014). Prior to his engagement as a researcher at the UNESCO Centre in Ulster University, Milliken had worked extensively with young people in Northern Ireland to develop cross-community initiatives through non-formal education. He has written extensively on the factors that affect the potential of citizenship education to contribute to reconciliation in a society still characterised by the sectarian segregation of schools. James was a primary school teacher and leader, where she led the development of citizenship in her schools. She is now a Senior Lecturer in Education at the University of Wales Trinity St David (UWTSD) and continues to champion and lecture on citizenship education. Jerome has a background as a secondary school humanities teacher and teacher educator in England and has been researching citizenship and children's rights education for 20 years. He was Education Director at the Institute for Citizenship when citizenship education was introduced into the English national curriculum and helped to establish the Association for Citizenship Teachers (ACT). Sant is originally from Catalonia (Spain) where she worked as a social science and citizenship teacher before joining the University to carry out her PhD in social science didactics. She has been working in

England as a citizenship education scholar for the last 8 years.

Pykett, Saward and Schaefer (2010) have argued that it is essential to analyse citizenship education in specific national contexts, because of the ways in which curricula are shaped by the political and educational cultures in which they arise. But, adopting a comparative approach is also useful because it helps to throw into focus issues that might be taken for granted within a specific context, and which only appear significant or worthy of comment by noticing omissions or differences in other contexts (Bray, Adamson and Mason, 2014). Whilst other articles have undertaken a comparative approach to citizenship education across the UK (Andrews and Mycock, 2007; Kisby and Sloam, 2012; Jerome, 2018), none of these has included contributors who work in each of the national education systems. We devised a writing process to balance national insights and comparative analysis. The authors met in Autumn 2021 and discussed the major trends in citizenship education policy and practice in each of the four nations. This initial conversation started with descriptive accounts and progressed onto comparative observations. This was followed by a cooperative process of writing in which each of the authors used their existing knowledge to provide an overview of the key citizenship education policies and practices in each of the four nations. These written accounts were produced after our initial comparative conversation, when some key points of interest had emerged. During these different writing stages, points of synergy and important differences among national approaches became more apparent. The resulting article provides an overview of citizenship education policy and practice that seeks to illuminate shared characteristics across the UK but also to highlight some of the distinctive approaches that Wales, Scotland, Northern Ireland, or England have pursued.

The article begins by exploring the curriculum models for citizenship education in each of the four nations and considers how these models have been practically enacted with reference to wider policy contexts. The following section considers the content of the curricula and explores distinctive ways in which citizenship is conceptualised in each of the nations. The final section provides an overview of shared challenges and possibilities for citizenship education within the UK context.

2. CURRICULUM MODELS IN CONTEXT

2.1 Scotland

In Scotland the status of the curriculum is largely advisory, with only minimal statutory elements (including a duty on local authorities to provide religious education in Scottish schools). There is no 'national curriculum' as such. Instead, the main curriculum framework document, A Curriculum for Excellence (first set out in 2004, and 'refreshed' in 2019), describes four overarching curriculum purposes: to enable young people to become successful learners, confident individuals, effective contributors, and *responsible citizens* (emphasis added). This latter element envisages such citizens as having:

- respect for others,
- commitment to participate responsibly in political, economic, social and cultural life.
- And who are able to:
- develop knowledge and understanding of the world and Scotland's place in it,
- understand different beliefs and cultures,
- make informed choices and decisions,
- evaluate environmental, scientific and technological issues,
- develop informed, ethical views of complex issues.

(See Scotland's Curriculum for Excellence https://scotlandscurriculum.scot)

Over time, the position of citizenship education in Scotland has undergone modification and re-positioning in light of other policy and curriculum developments (Britton, 2018). For example, the political literacy dimension became more prominent around the time of the Referendum on Independence in 2014, with the introduction of voting for 16 year olds in the referendum and certain other elections. Prior to 2014, the explicitly political and structural elements of education for citizenship were arguably underplayed in key documents (Frazer, 2003) in favour of a softer emphasis on 'good' and 'responsible' behaviours (Biesta, 2008).

Citizenship education in Scotland has also become closely associated with, and indeed subsumed within, the overarching frame of Learning for Sustainability (LfS). This latter aspect took on greater currency with the advent of the COP26 summit in Glasgow in November 2020, which refocused attention on the extent to which the entitlement to LfS (first set out in 2011) has been enacted in all schools. The connections between citizenship education and children and young people's rights and the United Nations Conventions on the Rights of the Child (UNCRC) are also potentially strong, notably but not exclusively in relation to Article 12 on participation; again this has been acknowledged at various phases of policy development in Scotland. The intention to incorporate the UNCRC fully into Scots Law provides another inflection point and another opportunity to embed and consolidate citizenship education more generally. At the same time, it is indicative of the fluid and accreting nature of multiple policy influences and drivers in this domain - this can act as a catalyst, but equally can dilute, confuse and add complexity to practice.

As there is no statutory curriculum in Scotland, most elements of curriculum content are instead presented as advisory, or indeed, left to the local discretion of teachers (albeit framed by overarching principles of curriculum design; detailed curriculum experiences and outcomes; and associated benchmarks). Some of these indicators make explicit reference to aspects of learning that fall within a reasonable understanding of 'citizenship education', including references in social studies outcomes to knowledge and understanding of political processes and concepts such as representation, and in skills

relating to the evaluation of the validity of evidence and argument. 'Citizenship' knowledge and skills can also be found in indicators for literacy and language, science, and religious and moral education.

Arguably the most natural curricular 'home' for citizenship education in Scotland is 'modern studies', a subject distinct to Scotland that emerged in the 1960s with a focus on a blend of political, social and economic perspectives and issues (Proctor, 2018). In particular, the political literacy dimension of citizenship is well served by modern studies, with a strong subject focus on principles of the democratic process, elections and voting, the distribution of political power across Scotland and the UK, and international studies. Modern studies teachers are also well-versed in navigating the pedagogy of controversial issues, the evaluation of competing and contested viewpoints, and the skills of debate and influencing. However, specialist provision of the subject sometimes suffers in comparison with history and geography, the other main social studies subjects with which it is often in direct competition when it comes to elective choice in middle and upper secondary schooling.

There is also a relatively small but growing uptake of politics and sociology qualifications in the upper secondary phase. These subject-specific opportunities for citizenship education are however only one part of the picture, indeed the principle conception of education for citizenship in Scotland from the outset, in policy terms, was as a theme that was the responsibility of all educators, irrespective of age, stage and subject (Learning and Teaching Scotland, 2002). One of the challenges in implementation terms has therefore been to ensure that there are citizenship education opportunities in Scottish schools for both breadth (a core entitlement available to all; and delivered by all), and depth (sufficiently advanced study that provides strong foundational knowledge and skills for young people as citizens).

2.2 Wales

In Wales, the revised Curriculum for Wales (CfW) is scheduled to be in place from 2022/23 and is structured on the recommendations from the Successful Futures report (Donaldson, 2015). Since the adoption of this foundation for the CfW schools have been engaged in the process of curriculum design. Central to the CfW vision for education are the four purposes which specifically reference citizenship, elevating citizenship from relative obscurity, and requiring a cross-curricular approach. An increased emphasis on citizenship aligns with the Welsh Government's introduction of the Wellbeing of Future Generations (Wales) Act (2015), which requires public bodies to consider the long term impact of decisions on sustainability. The ambition for CfW is that learners should become 'ethical, informed citizens of Wales and the world,' able to:

- find, evaluate and use evidence in forming views,
- engage with contemporary issues based upon their knowledge and values,

- understand and exercise their human and democratic responsibilities and rights,
- understand and consider the impact of their actions when making choices and acting,
- be knowledgeable about their culture, community, society and the world, now and in the past,
- respect the needs and rights of others, as a member of a diverse society,
- show their commitment to the sustainability of the planet,
- be ready to be citizens of Wales and the world (Welsh Government, 2020).

The CfW builds on the Scottish Curriculum for Excellence and in a similar fashion is clearer on what outcomes are desirable, as opposed to how teachers might achieve them. The curriculum is divided into broad 'areas of learning and experience' and citizenship related content appears most obviously in the 'humanities' area of learning and aspects related to identity also feature in 'health and well-being'. In addition, there is reference to critical media skills in 'languages, literacy and communication' and a Digital Competency Framework. Within humanities, citizenship features as an element across geography, history and religious education, but at the time of writing, the end of school exams are planned to remain as separate subjects - potentially leaving citizenship as marginalised. The primary sector has found the cross-curricular aspects of citizenship simpler to accommodate in its designs, partly because there are no comparable end of school exams in separate subjects.

Since 2015 there have been several policies introduced, which have had a direct impact on citizenship in Wales: the election of a Youth Parliament (2018), and the Senedd & Elections (Wales) Act (2020) which introduced voting rights for 16-year-olds. In addition, the Welsh Government introduced its Race Equality Action Plan in 2021 declaring its intent for Wales to become an anti-racist country by 2030. In conjunction with this Professor Charlotte William's Cynefin report (2021) recommendations are being mandated from October 2021. These added considerations will have a significant bearing on citizenship within the CfW.[1]

It is also relevant to note the relatively high profile of children's rights in Wales. Ministers are subject to a general duty to take into consideration the UN Convention on the Rights of the Child when making decisions and the Children's Commissioner for Wales (2022) is promoting a 'children's human rights approach' to education. This clarifies that human rights education should underpin the whole curriculum, including a commitment to teach about, through and for human rights. It promotes learning about human rights to ensure children understand their own rights, but also explains the connection between the curriculum, inclusion, equalities and empowerment, so that children have opportunities to make and share decisions.

[1] Cynefin is difficult to translate but relates broadly to questions of identity, custom and the land.

The Welsh Government has also made supportive moves to promote the teaching of citizenship and politics in the new curriculum. Its publication 'Teaching Citizenship and Politics: Guidance for Practitioners on Remaining Impartial' (Welsh Government, 2021) grounds this within a children's rights approach. Whilst advising teachers about the legal requirements for impartiality, it also makes it clear that students have rights to information, support to develop informed opinions, skills for media literacy and access to a diverse range of opinions. Whilst the curriculum itself does not create a timetable space for citizenship education as a separate subject, this guidance offers a model for how it should be developed within various areas of learning and experience.

2.3 Northern Ireland

From its creation in 1922, social and civic life in Northern Ireland has been characterised by an enduring schism between two communities each with their own strongly held political, religious and cultural identities: Catholic/Irish and Protestant/British. The provision of schooling has, on the whole, reflected this divide. Community tensions escalated into open conflict at the end of the 1960s and heralded the onset of the period known as 'The Troubles'. Some schools in the 1970s sought to ameliorate the impact of this by building cross-community links with schools on 'the other side'. In the 1980s the Department of Education declared that schools had a role to play in improving community relations and set up funding initiatives to support schools from both sides to work together (Department of Education NI, 1982 & 1988). However, these programmes tended to create opportunities for de-politicised cross-community contact rather than engaging with some of the more challenging issues that lay at the heart of the conflict (Richardson, 2011). The Belfast Agreement heralded an uneasy end to the thirty-year conflict in 1998. A power-sharing Assembly was established, and the Department of Education began the process of developing a new curriculum that was "better suited to the changing needs of pupils, society and the economy" (CCEA, 2000). Issues of identity and citizenship had been very deliberately left open in the peace agreement – citizens were able to choose either an Irish or a British nationality. Since there was no agreed concept of a 'citizen' (Arlow, 2004) educational strategies needed to be developed which would not be seen as promoting any one national identity or political viewpoint over any other (Smith, 2003).

Much of the typical content of citizenship education programmes in politically stable countries was highly contentious in the context of NI. Issues such as symbols of state, flags and anthems were potentially volatile. Instead, young people were to be acquainted with the concepts, language and ideas to allow them to develop their own understanding of citizenship (Gallagher and Duffy, 2016). A syllabus was therefore developed with a focus on how to think and how to do rather than what to think and what to do (Arlow, 2011). Citizenship education was eventually introduced to the statutory curriculum in Northern Ireland schools in 2007.

By contrast to Wales and Scotland, Northern Ireland appears to provide a clearer

curriculum model, although this apparent simplicity masks some complexities that make it far from straightforward. Initial debate focussed around whether the citizenship content should be aligned with humanities content (essentially similar to Scotland and Wales) but instead a decision was taken to create a new learning area called Learning for Life and Work (LLW). Local and Global Citizenship (LGC) was therefore built into the LLW area of the post-primary curriculum. Through LGC students address four inter-related concepts:

- diversity and inclusion,
- human rights and social responsibility,
- equality, social justice and democracy,
- active participation.

(See https://uk.ccea.org.uk/key-stage-3/curriculum/learning-life-work)

It had been intended that these would ensure that contentious local issues could be addressed, including the conflict and its legacy. Whilst LLW enjoys a central role in policy accounts of the curriculum, and is one of the few statutory subjects, in practice it is much more marginal than this suggests. Positioning citizenship in LLW also separates it from the humanities and religious education, which means it is separated from teachers with these areas of subject expertise (although it is possible for schools to map their citizenship provision across other subjects, including history and geography). In practice LLW is often timetabled as one subject and so the three main elements (careers, personal development and citizenship) are often allocated one term each per year. There is a GCSE exam in LLW, which is widely used, but flawed because it cuts across so many distinctive disciplines. As is often the case, the GCSE has a backwash effect, and teachers tend to limit their teaching to the requirements of the exam. A new GCSE in politics has recently been introduced, which offers another possible assessment route for citizenship.

Citizenship education was not only a 'new' subject for teachers to get to grips with but it also required them to engage with inherently contested issues. The enduring sectarian segregation of education meant that few teachers would have any significant professional experience of 'teaching on the other side' and many lack confidence in engaging with issues relating to identity and the conflict (Milliken, Bates & Smith, 2020). Additional training was essential and between 2002 and 2007 a £25 million package of development and support was put in place. Citizenship Officers were appointed, and every post-primary school was offered seven days training for up to five teachers over three years. A suite of teaching and learning materials was produced and many non-governmental organisations developed bespoke resource packages to support teachers as they took their first tentative steps into the new syllabus (McAuley, 2022). However, the implementation phase was varied because it was organised through different local Education and Library Boards. As a consequence, citizenship tends to have a stronger presence in the areas around Belfast and Derry, reflecting the emphasis that was accorded to specialist / cross-

curricular models when the curriculum was originally rolled out to schools. Despite this initial emphasis on training, teachers cannot qualify as specialist LLW teachers and therefore it is taught by a wide variety of non-specialist teachers. Whilst schools generally have a coordinator for LLW, it is rare to have a department, so teaching teams often include a wide range of teachers with expertise in other subject areas.

2.4 England

In England, the situation appears to be quite different in that the national curriculum includes citizenship as a subject for 11-16 year olds. This includes a clear list of content which students should be taught, including:

- The UK government, parliament and the monarchy,
- Europe, the Commonwealth and the UN,
- Diversity in the UK,
- Voting, elections and political parties,
- Freedom, human rights and the justice system,
- The role of public institutions and voluntary groups,
- How citizens work together to improve their communities,
- The functions and uses of money including personal and government budgeting.

(See: www.gov.uk/government/publications/national-curriculum-in-england-citizenship-programmes-of-study)

In the final two years of secondary school (14-16 years of age) students generally study for subject specific examinations (GCSEs) and there is a GCSE available in 'citizenship studies', which includes an opportunity to participate in some form of active citizenship project. These point to citizenship having an equal status to other subjects, especially related subjects such as history, geography and religious education.

However, in practice the situation is more complicated. Only 20,000 students took the GCSE citizenship studies in 2021, compared to almost 800,000 taking English language and 300,000 taking history, suggesting this route is chosen by approximately 2.5% of students (Nuffield, undated). One explanation for this low number is that the national curriculum is no longer a compulsory curriculum in schools which have 'academy' status and, as approximately 75% of secondary schools are academies, this means most schools are not practically required to teach citizenship. In addition, many schools which do teach citizenship do so alongside (and often embedded within) a non-statutory curriculum for personal, social and health education (PSHE). To further complicate matters, some elements of the PSHE curriculum have recently been made compulsory, namely requirements for relationships and sex education (RSE). This means the focus of these

combined PSHE programmes has recently been shifted towards the non-citizenship element, focusing instead on healthy relationships, sexual health, online safety and the law relating to consent, exploitation and safeguarding.

Finally, some of the content of citizenship has been incorporated into yet another non-statutory guidance document, outlining school duties to develop social, moral, spiritual and cultural education (SMSC). This guidance urges schools to promote the fundamental British values (FBVs) defined as democracy, the rule of law, individual liberty, tolerance of religious diversity and mutual respect. This guidance is included in the school inspection handbook, which means schools are strongly encouraged to comply, otherwise they risk a lower grade in their inspection (Busher & Jerome, 2020). Effectively, school inspectors judge the quality of SMSC provision but not citizenship as a stand-alone subject, thus shifting the emphasis onto the former. The Trojan Horse scandal in Birmingham established a high profile warning for those schools who were judged to be inadequately promoting these values, as staff were suspended and several schools had their quality rating reduced (Busher & Jerome, 2020). However, the pressure to conform, and to be seen to be conforming, with this policy, alongside the requirement to 'promote' these ideas as values, as opposed to learning about them or analysing them critically, has led to a form of performative enactment, in which the teaching can be hollowed out and delivered through assemblies, the pastoral curriculum or through school display boards. This also potentially undermines the provision of citizenship education (Vincent, 2019). This coincided with the promotion of character education, which has also been criticized as borrowing some of the language of citizenship (for example 'civic virtues') whilst essentially de-politicizing lessons on public issues (Jerome & Kisby, 2019).

In England the whole curriculum was revised in 2002, 2007 and 2014. In 2002 citizenship education was introduced as a new subject, in 2007 the programme of study was revised and in 2014 it was revised again. The first two curriculum reforms were under a Labour government and the final revision occurred under a Conservative / Liberal Democrat coalition. These changes demonstrate the ways in which citizenship education is shaped by prevailing political discourses about the curriculum and citizenship policy more generally (Jerome & Moorse, 2014). In the first two curricula there was a focus on skills and participation, but in the final version there was a renewed focus on knowledge, which meant that the definition of citizenship skills was much reduced and active citizenship was reformulated as volunteering and social action.

3. DIVERSE APPROACHES TO CURRICULUM CONTENT

In this section we turn to compare some of the aspects of curriculum content that are central to thinking about citizenship. We adopted Osler and Starkey's (2005) model as a sensitizing concept for our comparison as they distinguish between citizenship as status (where are we citizens?), as feeling (who do we identify with?) and as action (what do we do as citizens?). Charmaz (2014) promotes the use of 'sensitizing concepts' as initial ideas to pursue or useful ways to generate questions for further exploration. Whilst we did not

seek to apply Osler and Starkey's tripartite model in any systematic way to our countries, we did find them useful to consider the possible aspects of citizenship that might be included in a curriculum. This prompted us to consider citizenship as a legal status conferred by a state, that recognises an individual as a member of a political community, with rights to services, protection, and participation. But it also recognises that the term citizenship is used to reflect a more affective dimension to our experience, where it might be used to capture some of the more subjective aspects of how we identify ourselves with different communities. This also connects with important processes of othering, as certain groups are included and excluded. And finally, the focus on active citizenship reminds us that democracy is based on the idea of citizens exercising their rights to participate. Whilst voting is often seen as the archetypal expression of citizen action, and this does depend on individuals' recognition by the state, there are other forms of action that can be undertaken regardless of legal citizenship status, such as campaigning, protesting, boycotts etc. We took this model as the starting point for our comparative conversation but we do not want to simply provide a comprehensive list of similarities and differences, rather in this section we share some of the more notable omissions and differences across the four nations.

3.1 Status and identities

Turning first to the issue of citizenship status and the legal relationship between the state and the individual, it is useful to bear in mind Kymlicka's (2011) work on multinational citizenship, given that the UK comprises four 'nations', albeit it as a unitary state rather than a federal one. This still creates some confusion as terms are often used interchangeably, such as Great Britain (only England, Scotland and Wales); The United Kingdom (England, Scotland, Wales and Northern Ireland); and even the British Isles (which is a geographical term incorporating Ireland). Such terms can also be contentious, for example, many in the Republic of Ireland dislike the term 'British Isles' as it affords Britain dominance; similarly many in Northern Ireland dislike the Republic of Ireland being called simply Ireland, because Ireland is the whole island (North and South). The practical distinctions between nations are also blurred, as is demonstrated by each nation fielding their own football teams in FIFA football competitions, but combining as Team GB in the Olympics. And politically, some rights are reserved by the UK government, whilst others are devolved to Scotland, Wales and Northern Ireland, but there is no devolved government for England. This means that Ministers in the UK government have very different remits, for example, the Secretary of State for Education largely only governs English education (as this is devolved to the other three states) but the Secretary of State for Defence speaks for the whole of the UK. We might, therefore, expect citizenship curricula to engage with these rather complex issues. After all, it is useful to clarify the relationship between state and citizen, and also to clarify where responsibilities lie within the various levels of devolved administrations, so citizens can direct their attention to the

appropriate level of government.

In fact, there is relatively little said about this aspect of citizenship. England is the outlier as the curriculum explicitly identifies citizenship within the UK, and then discusses local and regional citizenship, although there is no mention of devolution. But in the other nations UK citizenship is rather downplayed. In the Welsh curriculum the humanities are supposed to help young people become informed citizens of Wales and the world and there is a new focus on 'cynefin' as a cross-curricular theme, signifying the importance of place and belonging (Welsh Government, 2020). Taken together, the evasion of UK citizenship and the promotion of cynefin might be criticised as a rather depoliticised notion of Welsh identity. In Scotland, the curriculum embraced a social model from the outset, focusing on the capabilities of citizens within a framing of social citizenship and people undertaking good actions (Biesta, 2008). As a consequence, it largely sidesteps issues of political ideology, political difference, and citizenship identity (Frazer, 2003). This perhaps reflects some of the communitarian beliefs of the Labour (and then Labour and Liberal Democrat) governments around devolution in 1999 and the period thereafter. The Scottish National Party (in government since 2007) have not sought to revisit substantially these dimensions of the citizenship curriculum. The emphasis has been quite consistently on developing a 'capability for citizenship' (Learning and Teaching Scotland, 2002), rather than engaging explicitly with questions of political identity and what constitutes citizenship itself. In Northern Ireland the word citizen itself is not used within the content of the curriculum. Here, the question of legal status and the relationship between nation state and citizenship was seen as sufficiently divisive to warrant sidestepping the issue. The issue of identity is dealt with in relation to diversity and inclusion, but it does not necessarily connect to political questions of identity, which are so important to understanding the Troubles and their legacy. Emerson has argued that this framing of the curriculum reflects the dominance of a social-psychological framing of community relations policy, which focuses more on group identity than on political divisions (Emerson / McEvoy, 2007).

Multicultural citizenship identities have also worked through the curriculum in slightly different ways. In Northern Ireland there is a sense that embracing a new multicultural citizenship can help move beyond old sectarian divisions and the situating of identity as part of diversity and inclusion tends to reflect this (Gallagher & Duffy, 2016). In England, the 2002 curriculum said relatively little about this, but the 2007 curriculum expanded significantly, introducing 'identity and diversity' as one of four key concepts and requiring new content including: changing identities in the UK, diverse cultures, migration and community cohesion. The 2014 curriculum excised all of this material and returned to a reduced version of the original wording "diverse national, regional, religious and ethnic identities in the UK and the need for mutual respect and understanding." By contrast Wales has adopted a new set of recommendations from the Williams Report (2021) to embrace Black, Asian and Minority perspectives across the curriculum, although these have not been integrated into the new curriculum and so teachers are left to combine

them. In Scotland, education for citizenship has often been presented as overlapping or indeed being essentially synonymous with global citizenship and/or international education. The conception of global citizenship in Scottish frameworks tends to stress cosmopolitanism alongside or indeed over nation-state forms of citizenship.

3.2 Depoliticisation: the example of rights

Comparison across the four curricula also highlights how the concept of citizenship is frequently depoliticised. For example, the Northern Irish curriculum focuses on concepts and issues and, whilst these can be related to political theories of communitarianism, cosmopolitanism etc., such links are not made explicit. This can lead to distortions, for example, human rights are taught as values, which can lead to a focus on responsibilities rather than entitlements. Whilst the intention was that such concepts would be taught intersectionally to combine into a framework for citizenship, in many schools these concepts are simply taught separately. In England, whilst human rights are mentioned for 14-16 year olds, younger students are supposed to learn about the "precious liberties enjoyed by the citizens of the UK," which means there is no requirement to teach about rights at all until the final two years of school. In Scotland there is a focus on learning about rights from a relatively young age, although actual provision may vary, depending on local uptake of schemes such as UNICEF's Rights Respecting Schools award scheme. At the time of writing, the Scottish Government is also seeking to incorporate the UNCRC fully into Scots Law, which would place a statutory obligation on schools to educate all young people about their rights (in accordance with Article 42 of the Convention). Other aspects of the UNCRC are also seen as central to education for citizenship in Scotland, notably Article 12 (respect for the views of the child), which requires authentic consultation and participation of young people in decision-making that affects them, including in schools.

Wales provides a notable exception to this general story as it fully adopted the UNCRC into law in 2011 and schools are encouraged to embrace this as a key part of the wider curriculum and school ethos. Consequently, all schools in Wales must have a school council in respect of Article 12, with some schools developing school parliaments and many encouraging engagement with school governors. The Children's Commissioner in Wales reports annually on the performance of the Welsh government in relation to the enactment of these rights and makes recommendations for improvement. The Commissioner (2022) has issued guidance on how children's rights are embedded in the new curriculum (for example through humanities and well-being and relationships education) and this connects a number of aspects of provision to rights as a theme across the curriculum. This complements specific discussion of rights in the humanities area of learning and experience, where rights are detailed explicitly in the definition of learning outcomes. In the Welsh curriculum, these are provided in five levels, defined as learning steps, and the highest level of achievement requires students to demonstrate they can:

- evaluate the underlying causes of injustice and inequality in a wide range of contexts in the past and present, and how they impact on human rights issues;
- evaluate the causes of human rights violations and the various factors that undermine or support people's rights;
- explain and evaluate the difference between wants, needs and rights;
- evaluate the importance of the roles played by individuals, societies, social movements and governments in respecting and defending people's human rights (Welsh Government, 2020).

3.3 Depoliticisation: soft citizenship and active citizenship

Andreotti (2006) contrasts soft and critical citizenship, where the former focuses on helping others through a sense of common human decency. Whilst laudable, this can restrict solutions to dealing with the superficial problems rather than tackling the underlying causes. It can also prioritise a self-regarding charitable form of action, which fuels a 'hero narrative' and even sustains an attitude of 'white saviourism' (Walsh, 2020). The Scottish curriculum has focused on a form of communitarian participation from the outset, and there has also been some development in young people's participation in their own learning decisions. Similarly, in Northern Ireland democracy and participation is a core concept and the curriculum states that young people should consider community issues and 'suggest actions', but political participation is underplayed in favour of helping out. In Wales there is a well-established Youth Parliament, but there are limited opportunities for students to engage with political participation in the curriculum. In England, as we saw above, the curriculum has always referred to 'responsible action' with a more recent focus on volunteering and helping.

This section has illustrated that, even where there are curriculum documents explicitly referring to citizenship education, there are very different expectations around Osler and Starkey's key dimensions – status, feeling and action. There is no common expectation that students will know about the UK and the devolved governments of Scotland, Wales and Northern Ireland. There is no common standard around understanding rights, even though the UK is a signatory state of the United Nations Declaration of Human Rights and the Convention on the Rights of the Child. And there is a rather 'soft focus' when it comes to thinking about identity and action. We turn finally to consider what our comparison might offer a reader interested in broader issues of curriculum construction.

4. FOUR PERMISSIVE CURRICULA: A RECIPE FOR ADAPTATION OR AVOIDANCE?

Despite the major differences we have explored in the previous sections, the four nations have something in common: their curricula (and the wider education policy overall) are highly permissive leading to a situation of asymmetric citizenship education practices. We are aware of examples of highly elaborated, extensive, and/or comprehensive citizenship

education practices in schools in each of the four nations. For example, in Scotland one group of young people worked with UNICEF UK to produce resources focusing on the causes and consequences of poverty as a lived experience (UNICEF UK, 2013). In Northern Ireland a group of young people has started a Secondary Students Union (Twitter account: @SSUofNI), which has established a working group on political education to lobby the school inspectorate to apply pressure on schools to improve political education. In England, some schools have joined community organising networks to engage young people in activist networks, campaigning for local mental health services, a living wage and safe havens in local communities (Doona, 2019). In Wales the Youth Parliament is directly communicating with the Senedd (Welsh Parliament) regarding issues that children and young people are raising, including mental health, climate, and the curriculum; providing comprehensive reporting on their work through their website and directly to schools. Such examples are inspiring, yet we know that they are not representative of the majority, and they often rely on the work of some highly committed teachers and students. Indeed, many children and young people within the UK have very little (and on occasions no) entitlement to citizenship education. A recent report in England, for instance, suggested only 29% of secondary students had whole lessons dedicated to citizenship education at least once a week (Weinberg, 2020). Similarly, only 27% of post-primary students in Northern Ireland had been afforded opportunities in school to explore local politics in a dedicated citizenship class and just under half had experienced lessons on voting and elections (Milliken & Smith, 2022).

It is worth mentioning that this level and extent of asymmetric practices is not an exception but, rather, a norm within the British education policyscape. Policies in the UK are cumulative - new policies do not necessarily repeal the existing ones and policymakers often publish recommendations and other forms of agenda-setting documents that inform the development of educational practical enactments without legislative change. As a result, the education policy framework and the way schools enact it is highly complex. In brief, as early as 1998, Ball explained, that education policy in the UK:

> displays a complex, fluctuating disarray of policy strategies, political projects and desires, which are popular and incoherent, totalising and individualising, homogenising and fragmenting. What we refer to as education policy is an ensemble of metapolicies which cannibalise and collate bits of other policies in response to the ebb and flow of public panics, inconsistent research, fashion, expedience and blind hopefulness (Ball, 1998: 188).

The situation has not changed much (Ball, 2021), and it is reflected in the complexity of the citizenship education policyscape within each of the four nations. With limited resources and time, schools and teachers in Wales, Scotland, Northern Ireland, and England need to respond to a range of simultaneous policy demands which often pull them towards different educational practices. As an example, we see how many teachers in Scotland could differently interpret and apply the idea of ‘global citizenship’ from within

the Learning for Sustainability framework, or choose to connect with the emphasis on 'responsible citizens' from the top level Curriculum for Excellence, or frame a learning experience from the curricular area of social studies or prepare their students to sit an advanced qualification in modern studies. On the one hand this complexity could be viewed favourably as representing a buffet of pedagogical choice, but on the other hand it might be seen as a confusing and cluttered landscape which risks incoherence and a lack of continuity and progression in learning. This is also to say nothing of the other competing and dominant priorities such as literacy, numeracy and the need to tackle fundamental issues of educational inequality.

The possibilities of these complex (but permissive) policyscapes are numerous. The existing frameworks allow schools and teachers across the UK to differently interpret curricula and other policy demands. This provides them with the flexibility to tailor citizenship education practices considering the context and the needs and challenges experienced by their students. For instance, young people in Northern Ireland have repeatedly said they are keen to learn about potentially controversial local issues of division and difference – including sectarianism, cultural identity, cultural expression and unresolved legacy issues (Bell et al, 2010; McGill et al, 2018). However, with a few notable exceptions (for example Emerson, Orr & Connolly, 2014), there is significant evidence that teachers are deliberately avoiding engaging in such issues. Indeed, it is the flexibility afforded by the curriculum that provides teachers with a 'loophole' to sidestep contentious issues and focus instead on the safer landscape of, for example, global poverty (Smith et al., 2019).

Simultaneously, the range of competing demands and the vagueness of many current policies favour different interpretations and enactments of these policies (Elwick & Jerome, 2019). In England, for instance, the controversial policy that requests all teachers to actively promote fundamental British values (FBV) has led to, at least four different interpretations (Vincent, 2019). Some schools just represent a cultural understanding of Britishness displaying posters and union jack-themed decoration; other schools repackage existing activities (e.g. school councils) to justify their alignment with the policy; a third group relocates the values explicitly described within FBV as school values; and a fourth group takes a critical approach to the FBV policy, for instance, democratising discussions around the meaning of democracy itself. Whilst this can be seen as a deficit in the coherent application of the policy, there is also a possibility that these different enactments illustrate the plurality of conceptions of citizenship within the same UK context (Sant & Hanley, 2018).

However, there is also a question of the degree to which these theoretical possibilities can be transformed into reality. Teachers' agency in the UK is increasingly constrained by accountability and standardisation practices (Sant et al., forthcoming) and schools are primarily evaluated by students' examination outcomes. The general lack of citizenship education evaluation across the four nations is likely to push schools to deviate their efforts towards other areas of study that are part of the formally evaluated curricula. This

is most evident in Wales and Scotland, where there are no explicit citizenship exams, but there is a more insidious effect in England and Northern Ireland, where the existing citizenship exams are often perceived as having a lower status to more established subjects. Simultaneously, teachers' practices are increasingly scrutinised in relation to a range of codes of conduct and inspection criteria. The existing documentation tends to position the enactment of citizenship education policies as a secondary aspect of educational practice. Again, this explains that schools, most of them suffering from limited time and resources, prioritise other areas of the curriculum and other aspects of schooling practice. What this means in practice is that, even if a curriculum remains in place, it is perfectly possible for it to be downgraded in practical importance, simply because other priorities are promoted above it - this is arguably happening in England, where a renewed focus on PSHE, RSE, the FBVs (and, for a brief time, 'character') are displacing the citizenship curriculum, even though the citizenship curriculum has not changed since 2014. This reflects what Emerson (2007) has referred to as a process of policy approximation, where teachers are left to do a lot of interpretation work themselves. In citizenship education this process of interpretation reflects the knowledge and attitudes of the (mostly non-specialist) teachers and the prevailing political messages about the role of schools and the nature of contemporary citizenship.

We also wonder whether teachers in the UK are prepared to navigate this policy complexity and exercise their potential agency. We can see how, across the four nations, the number of university courses dedicated to preparing citizenship education teachers has exponentially decreased. As we write these lines, only four universities in England (plus 11 small school-based courses) provide specialist teacher education for citizenship teachers, and one university in Northern Ireland incorporates citizenship as an element in a social science course. In Scotland, for the reasons stated previously, there is no dedicated initial teacher education course explicitly for the preparation of citizenship teachers, although a number of universities run postgraduate programmes for aspiring modern studies teachers, and some of the programmes aimed at the primary sector will include some content relating to rights, citizenship or global citizenship. Teacher training in Wales, for both primary and secondary, focuses on developing specialisms within the designated areas of learning and experience (AoLE). Currently, citizenship does not have a discrete subject and is considered to be a cross-curricular aspect of the CfW and all AoLE's are expected to engage with relevant concepts. Specialism in citizenship education would currently only be possible through additional academic programmes. As a consequence there are very few teachers who are explicitly prepared to teach citizenship education as a main subject specialism and to apply their expertise to enact citizenship education policies within schools.

5. CONCLUSIONS

Whilst citizenship education features in all four nations of the UK, we have argued that there are a number of factors that muddle the picture. First, whilst all the curricula are structured around subjects or clusters of subjects, the place of citizenship is inconsistent. Where citizenship appears as a curricular theme, it is often displaced in practice because it is not examined. Where it is specified as a subject, it is not always taught as such. And even where it is taught, the exam can exercise a distorting backwash effect, as restricted interpretations and non-specialist teachers create a narrow curriculum offer.

A second observation is that the content of the curricula often sidesteps important aspects of citizenship status and identity. None of the four curricula we have discussed include a comprehensive account of governance and citizenship in the context of devolved government in a unitary multi-nation state. In addition, the conception of citizenship tends towards soft citizenship, rather than critical citizenship, where social action, volunteering and doing good take precedence over critical political action.

Third, the curriculum in all four nations operates as a permissive framework. This means that particularly well-informed and motivated teachers and young people are not prohibited from undertaking politically informed active citizenship, but it also means they are not required to do so. Whilst inspiring examples exist, the norm is more likely to be restricted by competing priorities, lack of adequate teacher training, and a backwash effect of high stakes examinations and inspections.

Fourth, there is a tendency in all four nations for education policy to experience what we have called policy accretion. This is a relatively minor area of the curriculum, but a relatively significant political issue. Thus, citizenship education may exist in the cracks between better established subjects (as in the Welsh and Scottish curricula), and yet still be subject to a steady flow of announcements and policy initiatives, all of which have implications for citizenship, but none of which are necessarily integrated with it. Recent examples include education for sustainability (Scotland / England), LGBT education (England), economic understanding (England), and Black, Asian and Minority cultural understanding (Wales). Teachers, who are largely not trained as subject experts, find themselves grappling with these pressures and devising ‘approximations’ in the best way they can to reconcile all these pressures, given the lack of time, status, resources and expertise available to them. All of this suggests that all four nations have some way to go if they want education to play a role in helping young people to be adequately prepared for citizenship.

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