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CHAPTER 24

CITIZENSHIP EDUCATION IN FRANCE AND ENGLAND: CONTRASTING APPROACHES TO NATIONAL IDENTITY AND DIVERSITY

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There is often a perceived tension within education programs between promoting national unity and identity, and addressing diversity and the multiple identities of students. The ways in which nation-states address the tension between unity and diversity in the education of citizens (Parker, 2003; Banks et al., 2005) is no longer merely the topic of academic debate but is being discussed by political leaders and policy-makers as they respond to concerns about terrorism and seek to secure political loyalty (Osler, 2008). There is also a tension between the goal of promoting a specific and narrowly defined national identity (which in some cases may imply indoctrination) and the goal of educating for independent, critical thought. This chapter reports on a study of two neighboring European countries, England and France, both of which were introducing new citizenship education programs at the beginning of the twenty-first century. Drawing on documentary evidence, the study analyzes their contrasting approaches to national identity, social cohesion, and diversity.

The study also examines how French and English citizenship programs address the on-going challenge which racism and xenophobia pose to democracy in Europe. In 2007, nearly four million people in France voted in the first round of the presidential election for the far right *Front national* candidate, Jean-Marie Le Pen, who has an explicitly xenophobic agenda. The political success of the far right has been attributed to feelings of insecurity fuelled by the media, which from the mid-1990s has linked urban violence with the presence of minorities (Wieviorka, 1999; Osler & Starkey, 2005).

In Britain, although voter support for far right parties is much less than in France, support for the British National Party increased from just under 50,000 votes at the 2001 general election to nearly 200,000 in 2005 and 238,000 votes in local elections in 2006, resulting in 49 local councilors. Support for racist parties is strong in certain localities. The discourse of far right parties sometimes has an impact on the discourse and behavior of mainstream party candidates in those localities. Institutional racism was identified by the report into the racist murder of Stephen Lawrence (Macpherson, 1999) as pervading British life. Following the attacks of September 2001 in the United States and more particularly the London terrorist bombings in July 2005, there has been a growth in Islamophobic rhetoric in sections of the British media. Racism and political support for racist agendas are thus continuing features of French and British society and a danger to democracy (Osler & Starkey, 2002).

National Contexts

A new citizenship education program for England was introduced during a period of constitutional reform, which included the introduction of the Human Rights Act 1998, incorporating the European Convention on Human Rights into UK law; the establishment of a

Scottish Parliament and Welsh Assembly; and a new settlement in Northern Ireland, also involving devolved government. These developments are encouraging public debate about the meanings of nationality, national identity, and citizenship and the extent to which individuals and groups from both majority and minority communities feel a sense of belonging to the United Kingdom and/or its constituent countries of England, Scotland, Wales, and Northern Ireland.

Citizenship education was introduced in England partly in order to counteract disinterest in formal political processes, as expressed by record levels of voter abstentions. The program of study followed the recommendations of the government-commissioned Crick report which claimed: “There are worrying levels of apathy, ignorance and cynicism about public life” (Qualifications and Curriculum Authority [QCA], 1998, p. 8). The apparent apathy is seen to threaten democracy itself, with the Crick report quoting the Lord Chancellor as saying: “Unless we become a nation of engaged citizens, our democracy is not secure” (QCA, 1998, p. 8).

The citizenship education program is described as having three main strands: social and moral responsibility, community involvement, and political literacy (QCA, 1998). As well as a formal brief, and a prescribed program, secondary school teachers have official schemes of work for students (Years 7 -11) (QCA & Department for Education and Skills [DfES], 2001, 2002).

However, between the publication of the Crick report and its implementation, the Stephen Lawrence Inquiry report was published (Macpherson, 1999)— which highlighted the institutional racism which pervades the police force and other areas of public life, including education. The report identified the key role which schools can play in challenging racism. The Government responded by acknowledging institutional racism and identifying citizenship education as a key means for challenging racism (Home Office, 1999).

In the light of this expectation that citizenship education should challenge racism, the assumptions of the Crick report may not be well founded. It is not self-evident that voting behavior is an accurate indicator of political interest or engagement. Other evidence suggests increasing levels of political activity, broadly defined, amongst young people in England (Roker, Player, & Coleman, 1999). Although young people from particular minority groups have shown higher levels of abstention than their peers (Commission for Racial Equality [CRE], 1998), this may reflect experiences of exclusion and institutional racism, as reflected in lower educational outcomes and employment rates in these same groups.

The French guidelines and program of study, developed by a working party, the *Groupe Technique Disciplinaire, Éducation Civique* [Technical subject group for civic education], were introduced in stages, beginning in 1996 with students in Year 7 (6e). Teachers were provided with detailed official guidance (Ministère de l'Éducation Nationale de la Recherche et de la Technologie, 1998) and a number of educational publishers produced textbooks based on the programs of study.

Citizenship education has traditionally been high on the political agenda in France, having its roots in the need to consolidate support for the Third Republic from 1871, when democracy was restored. The first compulsory primary education curriculum statement, published in Article One of the Jules Ferry law 1882, put *instruction morale et civique* [moral and civic training] before reading, writing, and literature among national priorities (Costa-Lascoux, 1998). Government concern that students receive an education that helps them to become good citizens of the French Republic persists to the present day.

Citizenship education from its origins has been intended to help integrate a diverse population into a single national French culture defined as Republican, in other words, based on the principles of freedom, equality, and solidarity [*liberté, égalité, fraternité*] and on human rights. It is based on the conviction that the nation-state is responsible for transmitting shared principles for the public sphere.

Citizenship education in France is thus central to publicly funded schooling. The school is the Republic's primary institution for socializing citizens. It is the school, through its curriculum, that is entrusted with the mission of defining what it means to be a citizen and of ensuring that there is a common understanding of the rights and obligations of citizenship. The basis of national education in France is initiation into a common culture through a single curriculum. It does not recognize difference, but starts from the premise that, within the French Republic, all citizens are equal. Inequalities are deemed to stem from family background and therefore are irrelevant to the school, which belongs to the public sphere.

This official French Republican perspective, which finds expression in education legislation, is based on the premise that there is a danger of society fragmenting into ghettos or ethnic minority or religious communities (*communautés*). Such a tendency would undermine the very basis of the nation-state, which is to integrate all citizens into a single Republic founded on common universal values, namely human rights and the rule of law. This reluctance to recognize community identities has engendered conflicts and difficulties for schools, as with the various headscarf affairs since 1989, culminating in the outright ban in schools of all outward and visible signs of religious identity, including the *hijab*, in 2004 (Gaspard & Khosrokar, 1995; Starkey, 1999; Lorcerie, 2005; Tévanian, 2005).

Framework of Analysis

This chapter examines the secondary school citizenship education programs in England and France, using two of the 18 framing questions from the comparative civic education study initiated by the International Association for the Evaluation of Educational Achievement (IEA). The IEA study (1995) aimed “to explore and clarify how civic education is actually conceptualized and understood within each participating country.” Its rationale emphasizes fears for the future of democracy similar to those expressed by Crick: “increasing numbers of adolescents...are disengaged from the political system...Polite expressions of opinion...have little appeal among youth, many of whom distrust government deeply” (Torney-Purta, Schwille, & Amadeo, 1999, p. 14).

The two questions selected for the present study are IEA Core International Framing Questions 2 and 3. These deal respectively with national identity and relations between nations (Figure 1) and with social cohesion and social diversity (Figure 2). They do not explore the tension within programs between socialization into a national identity and education for critical thought. They are applied here to document evidence from each country, namely, the published programs of study and official guidance to teachers, supplemented, in the case of France, with a citizenship education textbook. In the case of England the examination of the programs of study is undertaken in the light of the government-commissioned Crick report, which provides a detailed rationale for the specified topics and approach.

The aim of the present study is to highlight similarities and significant differences between the two national programs and identify potential weaknesses. In France, textbooks play an important part in lesson planning for all subjects, including citizenship and are the main

source of teaching material. The same assumption cannot be made for citizenship teaching in England, since schools draw on specific local and topical concerns selected by teachers.

In carrying out this research, we wanted to explore the extent to which these programs of study may be said to be inclusive of all those who may be attending school in each country, particularly minority students. This analysis is original in that France is not included in the IEA survey. Furthermore the IEA data for England (Kerr, 1999) was collected before citizenship curriculum plans were published.

Given that educational institutions in both countries tend to reflect the social structures of the ruling strata of society (men dominating decision-making groups; under-representation of minorities), we pay particular attention to the extent to which the perspectives of minorities are included in citizenship programs. By definition, citizenship is an inclusive concept and the exclusion of minority perspectives would be a contradiction which would vitiate its effective implementation.

INSERT FIGURE 1 ABOUT HERE

Citizenship Education and National Identity

This section analyses the documentation for England and then France using the framing questions in Figure 1.

England

The program of citizenship education in England, implemented from 2002, consisted of a brief formal list of skills, knowledge, and understanding to be achieved and attainment targets to be met (Department for Education and Employment [DfEE] & Qualifications and Curriculum Authority [QCA], 1999). The Crick report, from which the program of study was derived, makes

references to the changing constitutional context in which citizenship education was introduced, arguing that by the end of compulsory schooling at age 16 pupils should:

[K]now about the changing constitution of the UK, including the relationship between the two Houses of Parliament, the changing role of the monarchy, shifting relationships between England, Scotland, Wales, and Northern Ireland and Britain's relationship with the European Union and the Commonwealth (QCA, 1998, p. 51).

Although British citizenship is presented as inclusive of national differences between England, Scotland, Wales, and Northern Ireland, the Crick report presents visible minorities as "other". Certainly, the general principle is inclusivity:

[A] main aim for the whole community should be to find or restore a sense of common citizenship, including a national identity that is secure enough to find a place in the plurality of nations, cultures, ethnic identities and religions long found in the United Kingdom. Citizenship education creates a common ground between different ethnic and religious identities (QCA, 1998, p. 17).

But this spirit of inclusion does not extend to minorities who, it is implied, cannot necessarily be relied upon to conform to the laws, standards, customs, and conventions of our democratic society:

[M]inorities must learn and respect the laws, codes and conventions as much as the majority—not merely because it is useful to do so, but because this process helps foster common citizenship (QCA, 1998, p. 18).

Thus the report assumes that minorities (here it is referring to Black British rather than White ethnicities such as Welsh or Scottish) need to change in order to realize a common

citizenship. No similar demand is placed on the majority White community, who are simply required to “tolerate” minorities. There is no recognition that minorities also exercise tolerance as part of the everyday experience of living in a multicultural society.

The implied processes of integration require change on the part of minorities, but none in the practices of White British citizens. The report presents a deficit model of minority cultures which are somehow less law-abiding (and possibly less democratic) than those of Whites, and which is also symptomatic of a colonial approach to Black British communities throughout the report. Such communities have more need of citizenship education than the majority because they are less familiar with and accepting of “laws, codes and conventions”. The report itself appears flawed in the way it reflects rather than challenges institutionalized racism in Britain (Osler, 2000).

There is an implicit recognition of the multiple identities held by British citizens. Yet there is also the hint that “national identity” and “common citizenship” may, in fact, be fragile. While there is no direct suggestion that any sub-national group may threaten a common British citizenship, the report argues that:

[T]hese matters of national identity in a pluralist society are complex and should never be taken for granted. We all need to learn more about each other. This should entail learning not only about the United Kingdom - including all four of its component parts—but also about the European, Commonwealth and the global dimensions of citizenship, with due regard being given to the homelands of our minority communities and to the main countries of British emigration (QCA, 1998, p. 18).

The report implies that some British citizens, those who are not White, cannot really call Britain home.

There is no acknowledgement of racism, but official guidance, published two years later, suggests there should be “consideration of local issues (such as particular manifestations of racism and its removal)” (QCA, 2000, p. 5), though no example is given of how schools might address these manifestations. The guidance recommends seven topics for organizing the study of citizenship and the first of these is “human rights (including anti-racism)” (QCA, 2000, p.20). Again, no further explanation is provided.

The Crick report developed learning outcomes for the lower secondary school (Years 7 to 9), and anticipated that students would study the UN Convention on the Rights of the Child (CRC) 1989, the Universal Declaration of Human Rights (UDHR) 1948, and the European Convention on Human Rights (ECHR) 1950. The context for this learning is framed by concepts such as *discrimination*, *equal opportunities*, *tribunal*, *ballot*, and *trade unions* for the CRC, and *prejudice*, *discrimination*, *xenophobia*, and *pluralism* in the section mentioning the other two human rights instruments. Human rights are also linked to *overseas aid*, *development*, and *charity* (QCA, 1998, pp. 49-52). This guidance fails to stress how ratification of the CRC and of the ECHR places obligations on the government to uphold rights. Instead, the emphasis is on the responsibilities of individual citizens.

The framing questions (Figure 1) refer to “documents, role models, or historical events” which might be used to illustrate the elements of the program of study. In the Crick report there is little in the way of documents or symbols suggested to reinforce national identity. The only documents cited are international human rights texts. The institutions mentioned in the programs

of study include parliament, the criminal and civil justice systems, the European Union, the Commonwealth, and the United Nations. The Crick report also included “the changing role of the monarchy” but along with other national institutions which retain a powerful role, such as the Established Church and the armed forces, the monarchy is omitted from the programs of study. There is no reference to national symbols such as the national flag or anthem. In this sense, neither the Crick report nor the programs of study are prescriptive of a national identity.

France

The French documentation, namely the citizenship program of study and official guidance (Ministère de l'Éducation Nationale, 1998), lays considerable stress on national identity and nationality. At the start of secondary school, in Year 7 (*6e*) there is consideration of personal identity, but only in relation to the nation-state (i.e., birth, marriage and death certificates, driving license, or passport). There is an emphasis on entitlement to French nationality and a detailed description of current nationality law. The section on nationality is closely linked to six main national symbols, representing common national values, namely, the Phrygian hat; the national day (14 July); Marianne (personification of the Republic); the flag; the national motto; and the national anthem. The exact same topics have already been covered at primary school and are revisited at the end of the lower secondary school, three years later.

The sections on acquiring French citizenship are addressed essentially to those who may not have it automatically, namely, those whose parents are not French and who were born outside France. Citizenship is portrayed as a function of nationality which is, in turn, defined by commitment to officially recognized shared symbols and values. This is a vertical, rather than

horizontal, view of citizenship. A horizontal interpretation does not require either citizenship or citizenship education to be linked necessarily to nationality.

Students in France are expected to study certain key documents, particularly legal and constitutional texts. In Year 7 (*6e*) the program starts with the formal *règlement intérieur*, the text that governs school behavior and procedures, emphasizing that students are in a rule-bound institution. In this school year there are two other national texts and two international. The preamble to the Constitution of the IV Republic (1946–1958) refers back to a French tradition of human rights developed at the time of the 1789 Revolution that is maintained in the constitution of the current V Republic and therefore stresses continuity of commitment to these principles.

The other key national document is a letter from the Minister of Education to teachers dated 1883 setting out the key importance of civic and moral education based on universal principles. These universal principles are set out in the two international texts, the UDHR 1948 and the CRC 1989. The clear implication is that French national values are universal. The principle is evident, but the experience of the way these universal values are embedded or not in the institutions of the French state, including schools, will be perceived differently by different categories of pupil. There is evidence, for instance, of differential treatment by French employers, police and schools according to perceived ethnic origins (Bataille, 1999; Savidan, 2007).

The study of the French constitution and of international human rights texts, including the ECHR, continues to underpin each year of the secondary program of study. Towards the end of lower secondary school, pupils study the European Union, introduced as a progressive supranational institution of positive benefit to France.

The programs are clear about their purpose, namely, to provide:

[E]ducation for human rights and citizenship, through the acquisition of the principles and the values which underpin and organize democracy and the Republic, through knowledge of institutions and laws, through an understanding of the rules of social and political life (Ministère de l'Éducation Nationale, 1998, p. 7).

This explicit statement that respect for and knowledge of human rights is a major goal of citizenship education is repeated and emphasized in the official guidance. The UDHR is designated as a “reference document” for each of the four years of lower secondary school and the whole text, or extracts, are reproduced in textbooks.

The emphasis on human rights is considerably more developed in the French program than in the English. A very influential report for the minister of education in 1984 and a subsequent action research program ensured that the case for human rights as the fundamental principles underpinning education for citizenship is accepted by all major political parties (Audigier, 1991). In contrast, the Crick report and the subsequent teacher guidance place human rights in a legal, rather than a broader social or political framework (QCA, 1998, p. 49; 2000, p. 20). The English formulation of purpose is:

Citizenship gives pupils the knowledge, skills and understanding to play an effective role in society at local, national and international levels. It helps them to become informed, thoughtful and responsible citizens who are aware of their duties and rights (DfEE & QCA, 1999).

Concepts of Community

Citizenship can be understood as belonging to a community. Individuals experience citizenship in local communities, through engagement with others in those communities (Osler & Starkey, 1999, 2005). It is at this level that young people most commonly appear to express their sense of allegiance and belonging (Osler & Starkey, 2003; Mitchell & Parker, 2008). IEA framing questions (Figure 1) introduce the notion of communities.

The Crick report gives strong emphasis to the local community; in particular, ways students can learn about citizenship through “volunteering” (service learning). Crick contends that a key role of citizenship education is to promote political literacy at national, and especially at local or community level. Citizenship education should encourage: “An active and politically-literate citizenry convinced that they can influence government and community affairs” (QCA, 1998, p. 9). Lack of involvement is explained in terms of lack of knowledge or skills, rather than with any disillusionment in political processes arising through structural disadvantage, or through observation of the behavior of certain public figures.

There is an emphasis on rights and responsibilities, which might be construed as implying that citizenship is not an automatic right but must be earned. This raises questions about the citizenship status of those who for whatever reason are not able to take an active part in the community. There is no acknowledgement that experiences such as poverty, unemployment or disability may lead to social exclusion and prevent full participation.

An understanding of national and ethnic identities and of the UK as a political entity and its relation with other nations does, however, require a study of empire and of independence struggles. From 2008, the history program of study refers to decolonization and resistance to empire. The British government has also approved the recommendation of the Ajegbo report

(DfES, 2007) to add an additional strand to the citizenship curriculum “identity and diversity: living together in the UK”. Unfortunately, this report fails to adopt a critical perspective on race or multiculturalism or adequately address the relationship between citizenship and history education (Osler, 2008, in press).

It is on the question of community that the French program contrasts most starkly with that for England. In France, at the beginning of secondary school, the school as a community is the subject of the first few lessons. The emphasis, however, is on understanding the school as an institution: roles; facilities; the system of governance through class and school councils; and school rules. Elections are held for class representatives who have a formal role in representing the views of fellow students in the class councils [*conseil de classe*] and on the governing body [*conseil d’administration*].

There is a substantial section on local democracy, including the powers of local councils and a clear indication of who is eligible to stand for election and who can vote, namely French and EU Member State nationals. A further local dimension is the environment and concern to protect local and national heritage, including: traditional customs and folklore; food and cooking; art and culture; and historic buildings. This is a conservative agenda in a literal sense. The only indications of cultural diversity relate to regional culinary and folkloric traditions and the collections of local museums.

The work of political parties, unions, pressure groups, and other associations is presented as healthy elements in a democracy. Students are expected to discuss and debate issues these groups raise, and consider ways in which citizens work through them to influence democratic decision-making. What is entirely absent is a consideration of religious groups and structures, in

spite of the fact that the Catholic Church, for instance, remains a powerful political force in France. There is no equivalent to the section of the English program of study which refers to “faith groups”.

The missing religious dimension, a function of the French Republic’s constitutional commitment to neutrality in education [*laïcité*], is likely to limit the scope of discussions on a number of the issues arising from the program of study, including women in society and issues of social justice. Each of these is potentially the subject of pronouncements by religious authorities whose views may be important to some pupils’ families. However, following the US/UK invasion of Iraq in 2003, there were political concerns about increasingly public assertions of Muslim identities. The 2003 reports of the Stasi and the Debré commissions led to a cross-party consensus to pass legislation to ban visible religious symbols from schools from September 2004 (Lorcerie, 2005).

In contrast to France, publicly-funded schools in England have had an obligation, since 1944, to include a daily act of worship and religious education. From 1997, the Labour government gave an additional impetus to publicly-funded faith schools. Although such schools (Christian and Jewish) have been incorporated into the public sector since the nineteenth century establishment of a national education system, government support for such schools has extended and now includes a small number of Islamic, Hindu, and Sikh institutions. Many such faith schools have a greater degree of independence in their admissions policies and curricula than other publicly-funded institutions (Osler, 2007).

INSERT FIGURE 2 ABOUT HERE

Social Cohesion and Cultural Diversity

This section addresses the second set of IEA framing questions (Figure 2).

England

The Crick report gives relatively little attention to the impact of race, ethnicity, home language, social class, religion or gender on citizenship. There is one passing reference to “an awareness of equal opportunities issues, national identity and cultural differences” (QCA, 1998, p. 19). The only explicit reference to exclusion or discrimination is as follows:

The curriculum should consider the factors that lead to exclusion from society, such as bullying, colour and other forms of “difference”. It should make students aware of the difficulties such exclusion can have on the individual and society (QCA, 1998, p. 19).

Discrimination is set in the context of “bullying” which may be interpreted as an interpersonal action rather than structural disadvantage. There are no references to past discrimination; instead, the move towards universal enfranchisement is presented as successful and complete.

There is no sense of historical struggles for social, economic, civil, and political rights. The notion that for some groups this struggle continues is absent. The emphasis is on the need for cohesion, the need to get minorities on board, and on the rule of law. Conflict is portrayed as a problem; there are no examples of positive outcomes arising from societal conflict. Although there is concern that the education service be inclusive, it is left to schools and teachers to apply the advice to citizenship education or not.

France

An analysis of a textbook (Lauby, 1999), developed to support the program for students in Year 10, provides evidence on French perspectives on social cohesion and social diversity. Social cohesion is presented in this textbook as shared commitment to the fundamental principles

of the Republic: freedom, equality, and solidarity. The program for Year 10 (3e) progresses from the individual and individual identity within society to collective citizenship within the nation. The early pages contain several color photographs showing Black people and minorities identifying with the national flag, and proudly representing the nation. The multiethnic French football team's victory in the 1998 World Cup is portrayed as demonstrating the integrative capacity of the Republic.

The Republic is characterized as “indivisible,” meaning citizens are guaranteed equality before the law. However, the gap between principles and social reality is explicitly acknowledged. In the textbook, the late President François Mitterrand is quoted as saying in 1988 that “Mutual respect is the basis for the pact without which national community would have no meaning. An unjust France is a divided France” (Lauby, 1999, 15). In other words, national political action must focus on justice without which the principle of indivisibility is breached. This statement, although coming from a political figure closely identified with a left of centre party, is presented as an uncontroversial French Republican statement, rather than a party political claim. It is provided in order to contrast with claims made by “enemies of the [French] Republic”, namely, the far right, racist *Front national* party. A section on threats to the Republic highlights the armed Corsican independence movement, racist politicians and, as in England, voter apathy.

The emphasis, supported by numerous images, is of citizens actively engaged in the French Republic's central task of promoting justice. The book's cover shows young people involved in a demonstration and there are a further nine photographs of demonstrations and strikes, all presented positively. Active citizenship is linked explicitly to demonstrations, political

party membership, and participating in strike action. Striking is described as “one of the great social achievements of workers, it is recognized by the Constitution” (Lauby, 1999, p. 83).

The Republic is portrayed as a “melting pot.” France is described as “a country of immigration.” People have come to France from all over the world and “accepting the values and the symbols of the Republic they have integrated into French society. Their children have become French citizens” (Lauby, 1999, p. 28). However, it is also pointed out that only French nationals may vote and so “citizenship is linked to the possession of French nationality” (Lauby, 1999, p. 29). There is little to suggest that minorities may be subject to discrimination, except at the hands of far right political parties. There is a reminder of the 1940 Vichy law excluding Jews from any public office or job but this is not matched with evidence of current discrimination against minorities in housing, policing, and employment (Dewitte, 1999).

On the other hand there is acknowledgement of social exclusion, represented in the textbook by the homeless and the unemployed. One section is devoted to women’s struggle for parity and one of the illustrations is clearly linked to the communist trade union movement.

While individual members of minorities are welcomed as French citizens, the textbook also makes clear that any attempt to develop a sense of community founded not on citizenship but on ethnic identity or solidarity is alien to the values of the Republic: “The Republic cannot accept an inward-looking communitarianism which is likely to endanger the unity of the nation.” Communitarianism is defined as:

[A] situation where society is split into inward-looking groups based on ethnicity, culture or religion. This often leads to the setting up of ghettos and sometimes to conflicts

between groups. It is the opposite of the French Republic's principle of indivisibility (Lauby, 1999, p.15).

This tension is demonstrated by a picture of a large number of Muslims praying in a Paris street. The caption is "exercising fundamental rights." The commentary reads:

To be a citizen is to be able to exercise one's rights freely. Practicing the religion of one's choice is a fundamental right. However, exercising this right implies not offending other people's religious convictions; there is no place for acts of worship in public places.

Consequently all religions should have available properly appointed places of worship (Lauby, 1999).

This implies that those in the picture are at fault and should be inside. It fails to take into account the attitude of local councils which have frequently denied planning consent for mosques (Hamm & Starkey, 1998).

Compared to the English program of study, the French program is much more ready to take a positive view of political activity and recognize that social conflict can lead to progress. But it is unable to accept notions of personal identity within the Republic, where these identifications are related to ethnicity, culture or religion. Given that multiple identities are the norm in modern societies, France's failure to recognize the possibility of combining a group identity with a French and Republican identity defines citizenship in exclusive terms (Gaspard & Khosrokar, 1995).

Conclusion

A comparative study places national programs of citizenship education in a fresh perspective, allowing readers to reflect on both the countries under discussion and others with

which they may be familiar. Any discussion of citizenship education, national identity, and diversity raises questions about the tensions which may be experienced by students between the inclusive ideal and the exclusive (and potentially alienating) reality.

In both England and France, new programs of education for citizenship aim to reinforce and strengthen democracy. The French program is based on Republican values, particularly human rights, and emphasizes the unacceptability of racism and discrimination. The program for England emphasizes social and moral responsibility and active engagement with society. It is therefore more pragmatic and less concerned with core principles.

The French program of study is declarative of its principles of freedom, equality, solidarity, and human rights. These are presented as problematic only in that there is an on-going struggle for their implementation. Pupils are invited to join that struggle. There is a clear sense of national identity associated with the French Republic.

The English program of study, like the British Constitution, relies heavily on the implicit. There is no sense of an existing national identity, which is presented as something yet to be created (QCA, 1998). The very notion of citizenship is relatively new and remains as something to be defined. It is implied that citizenship will develop through consensus rather than struggle. Young people, it is suggested, will grow as citizens through service learning in the local community rather than through participating in strikes, struggles, or demonstrations for change. Local community engagement is presented as equally important to an awareness of national issues. Teachers in England are amazed to hear that French textbooks emphasize the right to strike, and it is difficult to imagine that such a textbook would be well received by British parents.

In both France and England the population is increasingly secular, yet also, paradoxically, increasingly multi-faith. The two countries have adopted different responses to these developments. The French government has taken an approach in which symbols of religion, including the headscarf, which were often in practice tolerated, are no longer permitted. Religion has been pushed, as far as is possible, into the private sphere. By contrast, the British government acknowledges religious diversity and has increased the power and status of religious groups and authorities in schooling. Both approaches bring with them problems. In England, students have the opportunity to study religious identity, although in some schools and some areas students are increasingly segregated by religion. In France, young citizens are expected to ignore their religious identities at school; although these very identities may help shape their public lives as citizens.

Neither program of study gives significant weight to the perspectives or experiences of minorities. The French program roundly condemns racism but fails to explore it. The English program recognizes a range of ethnic groups and expects understanding of diversity. It expects individuals to challenge prejudice and discrimination, but does not consider collective responses or the existence of institutional racism and structural disadvantage. Perhaps the major conclusion that applies to both national programs of study is that there is little evidence that minority groups participated in their formulation. Until national curricula and discourses on citizenship are responsive to minority as well as majority perspectives they are likely to remain exclusive.

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