

**CONVERGENCE AND DIVERGENCE IN CONCEPTIONS OF
CITIZENSHIP WITHIN GHANAIAN, SINGAPOREAN, AND
WELSH CITIZENSHIP EDUCATION CURRICULA: A
MIXED-METHOD COMPARATIVE ANALYSIS**

ROBERT. G. JAMES

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Abstract

This thesis investigates changing conceptions of citizenship in the national curriculum documents of three postcolonial countries, Ghana, Singapore, and Wales, between 1991 and 2024, to assess the extent to which their conceptions of citizenship are converging. Against a backdrop of accelerated globalisation, it examines how Citizenship Education Curricula (CEC) interpret and emphasise three core dimensions of citizenship (*Rights and Responsibilities*, *Participation*, and *Identity and Belonging*). While citizenship is widely considered to be an essentially contested concept, research has largely focused on implementation and the subjective experiences of teachers and pupils, rather than the concept itself, via the intended curriculum. This study addresses that gap.

Employing an innovative cross-national and temporal research design, the study analysed twenty officially sanctioned syllabi, using a mixed-methods approach, combining content analysis, an innovative Key Syllabus Mechanism (KSM) analysis, and detailed textual analysis. This enabled a robust comparison of CEC across countries and over time, which is a necessary approach if one is to demonstrate curriculum convergence.

Findings showed in all three countries curricula emphasis on citizen's *responsibilities* has grown, whilst aims and content addressing citizens' *rights* has declined, sharply in Singapore, moderately in Ghana, and unevenly in Wales. Furthermore, representations of citizens' responsibilities have shifted from broadly socio-political to almost exclusively social and civic, and representations of rights, have seen Ghana increasingly combine constitutional and human rights framings, Wales consistently foreground universal human rights, and Singapore largely omits them altogether. Additionally, a strong trend toward shaping autonomous, decision-making individuals also emerged, along with new responsibilities related to digital citizenship, accompanying consistent concerns with economic development and environmental stewardship.

The citizenship dimension *Participation* has become more prominent across the board, particularly as a KSM and curricular aim, but participation is also, increasingly framed as social and community engagement rather than political involvement. Efforts to foster

participation in government, politics, and democracy have weakened in all three cases. Instead, Ghana stresses participation in nation-building, Singapore, as social cohesion, and Wales, as social action.

The most convergent citizenship dimension, both in terms of emphasis and meaning, was *Identity and Belonging*, which saw the concept's syllabus coverage expand universally, in all three countries, where its meaning also evolved, from monocultural and nationally-bound, towards multilayered conceptions, inclusive of self, social, cultural, national, and global belonging. National identity remains central and global identity is only tentatively emerging by comparison.

Overall, the study finds evidence of convergence in the emphases each nation places on the three citizenship dimensions (*rights and responsibilities*, *participation*, and *identity and belonging*), reflecting shared international pressures, but simultaneous convergence and divergence in terms of what these concepts actually mean and how they are framed in each nation's CEC, reflecting different national, political, cultural, social, geographic, and historical contexts. Citizenship remains framed as a national enterprise, even as global influences reshape its expression. This thesis contributes to the fields of curriculum and citizenship studies, and comparative international education, offering new insight into how states define the citizens they seek to shape in a globalising world.

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Chapter One: Introduction and Study Background

1.1 Introduction

This exploratory study set out to understand changing conceptions of citizenship in a selection of Ghanaian, Singaporean, and Welsh Citizenship Education¹ Curricula (Hereafter CEC) documents implemented between 1991 and 2024. By comparatively analysing consecutive curriculum interventions from these three postcolonial² nations, during a period of “accelerated globalisation” (Tomlinson, 2007:410, Tuncer, 2023:87), where Ghana and Singapore represent meaningfully contrasting cases, the study seeks to explore how conceptions of citizenship are evolving within national contexts, and whether or not they show signs of convergence cross-nationally.

Citizenship education can help pupils develop the knowledge, skills, and attitudes needed for full participation in a democratic society. It can help shape identity, foster belonging, imbue a civic spirit, assist social cohesion, boost volunteerism, and develop rights-awareness. It can further inculcate responsible citizenship and produce law abiding citizens. Subsequently, “Citizenship is many things to many people” (Joppke, 2007:37) and varies cross-nationally accordingly (Han et al., 2013). As citizenship has been presented as a “panacea to solving problems confronting humankind” (Koku 2017:101), the last three or four decades has seen an “explosion of interest in citizenship teaching” (Keating, 2016:40) and in “...scholarship in

¹ Unless otherwise stated, the phrase “citizenship education” refers to a broad collection of subjects, not just strictly those titled citizenship education. It essentially refers to any prescribed curricula that holds as a central goal, the shaping of future citizens. Common examples include, social studies, character education, civics, and many more.

² Although Wales is technically not a postcolonial nation, its devolved status, particularly with regard to education, means it can be considered postcolonial for the purposes of this study

comparative civic education” (Hahn 2015:3). This time has seen an empirical research base of CEC “grown remarkably” (Akar, 2018:415), with many nations also expanding or revising their curricula to ensure the best approaches to citizen shaping are maintained (Brooks and Holford, 2009). This includes the study countries, all three of which are actively involved in implementing newly reformed Citizenship Education Curricula (Hereafter CEC) as of 2024. In Ghana and Singapore, 2024 saw the introduction of a new Social Studies curriculum, and in Wales, the rolling out a *Curriculum for Wales* (2022)³ is scheduled to last until 2026/7. Yet, despite this increased attention, a universally accepted definition of citizenship remains out of reach.

As will be elaborated in Chapter Two, the reasons for this lack of definitional coherence, is that citizenship is essentially contested (Lister, 1997:1, 2012:373), philosophically deep-rooted (Fouts and Lee, 2005:20), undergoing rapid domestic and international change (Soysal, 1994:1/2, 1997:3), and generally context dependent (Whitty 1999:1). Subsequently, three key questions emerge, how is citizenship conceived in different national curricula, how is this changing, if at all, and finally, does any of this reflect a convergence in the types of citizens these nations seek to shape.

For the remainder of this chapter, sections 1.2 to 1.10 articulate the research problem (1.2), justify the use of curriculum documents as expressions of governmental intent (1.3), outline the theoretical framework (1.4), explain the selection of Ghana, Singapore, and Wales (1.5), and their colonial contexts (1.6), present the research questions (1.7) and timing of the study (1.8), before providing an overview of the thesis and its principal findings (1.8).

1.2 Articulating the Research Problem

The essential problem is that citizenship is a “contested concept” (Lister, 1997:1, 2012:373, Kerr and Cleaver, 2004:7, Clegg 2020:15), rooted in conflicting philosophical traditions (Fouts and Lee, 2005:20), including liberalism, civic republicanism and communitarianism. It

³ NB. Whilst Wales’s new curriculum, *A Curriculum for Wales*, was implemented in 2022, the *Humanities AOLE draft guidance document* was actually published in 2019. Consequently, the following references have been deployed in this thesis respectively: *A Curriculum for Wales* (2022) and *Humanities AOLE* (WG, 2019)

suffers conceptual conflation, inflation, and diverse disciplinary interpretations. Its meaning has developed, evolved, and more recently proliferated across multiple fields. Consequently, CEC and the conceptions of citizenship and the good citizen embedded within, can vary substantively. One nation's conception of citizenship may be very different from another's. They may emphasise different aspects of citizenship and even interpret citizenship in fundamentally different ways. We cannot assume therefore, that because multiple countries implement citizenship education, they seek to shape the same types of citizens, nor can we assume that a nation's conception of citizenship today is the same as in the past, or that it will remain unchanged into the future.

Recent research on citizenship education has arguably underexplored these questions, as it has instead engaged enthusiastically with questions of efficacy (Keating and Janmaat 2016, Campbell and Niemi 2016, Ten Dam et al., 2020, and Hernandez and Gailis 2021), leading to a concern with the subjective experiences of *teachers* (Evans, 2006, Osler, 2011, Patterson et al., 2012, Akdag, 2021, Pala, 2023, Wu and Tse, 2025) and *pupils* (Sandström et al., 2010, Fournier-Sylvester, 2014, Wood, 2014, Olson, 2015, Heathcote, 2017, Saha 2020, Ten Dam et al 2020, Dansholm, 2022).

Ultimately, research on the intended curriculum seems to be less prominent in the relevant empirical literature than studies of the subjective experiences and interpretations of educational stakeholders (pupils, teachers, and to a much lesser degree, parents), though CEC are included, nominally, as a triangulatory device, in a range of curriculum coherence, implementation, and efficacy studies. Since the early 1990s, “unprecedented extension and intensification of globalisation.” (Crafts, 2024:1) has occurred, challenging traditional notions of nation-bound citizenship and citizenship education.

In a rapidly globalising and increasingly postnational world, it is more important than ever to examine CEC, particularly as expressions of national governments' intentions for shaping future citizens. This requires sustained attention to how conceptions of citizenship are defined, emphasised, framed, reframed, and sometimes omitted within national curricula, as these documents provide critical insight into how states seek to negotiate citizenship, and citizen shaping in schools, amid changing global conditions.

1.3 Researching Government Intentions Using CEC

Documents

Some researchers have questioned studies that seek to understand meaning in the minds of subjective actors (Hodder et al, 2000, Miller and Alvarado, 2005; Bowen, 2009), including pupils and teachers. However, similar concerns also apply to research on intent more broadly, including those of curriculum makers. If intentions exist only in individuals' minds, how can researchers access them? This issue is captured by Wimsatt and Beardsley's (1946:468) argument that "the design or intention of the author is neither available nor desirable as a standard" for research. While developed as literary criticism, it highlights a broader methodological challenge, that researchers cannot reliably know what policymakers or curriculum developers were thinking when a text was produced. In this sense researching intent is arguably impossible.

The current study however does not seek to penetrate such intentions. Instead, it treats syllabi as official statements of intent in their own right, sanctioned by respective governments. As authorised curriculum texts, syllabi specify the knowledge, skills, values, and behaviours deemed legitimate for education, and needed by society. Their aims, learning outcomes, content, and assessment structures indicate what governments want students to know, value, and become. Accordingly, syllabi can, and are, treated here as formally sanctioned expressions of governmental intent for shaping future citizens. This is an important distinction, the theoretical and methodological basis for which, is elaborated on in Chapter Four, Section 4.8.2, but for now, it must be clarified, the focus of this research is not the intentions of curriculum makers responsible for the syllabi analysed, but the syllabi themselves, whose design and contents are presumed intentional, by virtue of being in the document in the first place. With this distinction made, let us turn our attention to the theoretical basis for the research, and the reason these documents have been targeted for analysis in the first place.

1.4 Theoretical Basis for the Research

Traditional, nation-state-based conceptions of citizenship are being challenged by the rapid social, political, economic, technological, and cultural transformations taking place in

contemporary societies (Soysal, 1994:1/2). Two contrasting interpretations of this process dominate the literature and form a central debate in the literature, regarding national and postnational citizenship and globalisation.

Firstly, *national erosion* is the idea that globalisation leads to the erosion of state autonomy, the homogenisation of national cultures, and the weakening of traditional bonds of identity between citizens and the state (Bird and Stevens, 2003:395, Brodie, 2004:323, Falk, 2000:5.) In this view, the increasing interconnectedness among economies, governments, and citizens, of different countries, economically, politically, and culturally, are understood to loosen the bonds of national citizenship. Bird and Stevens addressed this (2003:396), arguing globalisation is fostering an “...obsolescence of national cultures around the world...” and that there is an “associated convergence of these national cultures into one commonly accepted global culture.” Bird and Stevens cautioned however, that it is fanciful to imagine emerging global cultures will fully replace national cultures, but that nevertheless, the latter must adapt, if they “...wish to remain relevant in some viable fashion.” (2003:39). For the remainder of the thesis, ‘national erosion’ will be the name attributed to this broad position, where nation states and national cultures are obsolesced, disempowered, and otherwise eroded by homogenising global forces. It is in this context that postnational citizenship has emerged as a heuristic device (Soysal, 2024:69), to explain transitions in contemporary citizenship, where citizens’ rights, responsibilities, belonging, and identity, are increasingly decoupled from the nation state, and positioned beyond once thought of as impermeable national boundaries and borders.

By contrast, the other interpretation of the effect of globalisation is *national resilience*, which recognises globalisation’s transformative capacity but refutes its terminal diagnosis of the health of the nation state as overstated (Green, 2003:9, Tomlinson, 2003:269, Ang, 2014:10). As Green (1997:9) argued, despite globalisation’s homogenising effect, “Nation states, ... will survive as the only viable sites of political representation” (Green, 1997:9), Tomlinson (2003:269) added, “...that cultural identity, properly understood, is much more the product of globalization than its victim” (Tomlinson, 2003:269), and Ang (2014), even warns:

...the more global the world becomes, the more insistent particular differences, especially of the nationalist kind, are being articulated around the world (2014:10)

It is important to consider that citizenship education research has traditionally been confined to an examination of the national citizen. However, in response to globalising forces, it has been suggested that such research “must embrace the concept of the global citizen” (Gopinathan 2012:2). Some postmodernists and postnationalists have even predicted national educational systems will struggle in a post-modern and postnational world, if not become extinct, and that “globalization theory predicts the end of the national economy and the end of the nation state as the primary unit of political organization and loyalty” (Green, 1997:169). The implications of this for education, Green suggests, are immense. The concern being that curricula would “gradually converge towards some regional or global norm, divested of any specific national characteristics.” (1997:169) and that, “The historic function of NESs, to transmit national cultures and to reproduce national labour power, would become obsolete” (1997:169). Green however, argued the nation state will retain a role in educating its citizens, despite the ongoing impacts of globalisation on education.

As globalisation accelerates, the question emerges, are countries’ curricula converging in response? Green posits the only way to assess whether such changes are occurring, is to deploy an approach that is both cross-national (global) and temporal (historical) explaining that,

The theory of globalisation is based on revolutionary notions of time and space and how these dimensions are changing in the postmodern world...its claims, logically, can only be assessed through an approach which is both global and historical (1997:169)

While comparative research ordinarily assumes important differences among countries, to some, globalisation means greater homogenisation (Anderson-Levitt, 2008:349). One of the problems in trying to understand this tension more clearly, is that much related literature is normative, tending to concern itself with what citizenship education should be, rather than what it is, making it difficult to understand the nuance in actual national provisions (Goren and Yemini, 2017:181). It becomes clear then, that researchers must first ask the question, what forms of citizenship are countries actually delivering. This Anderson-Levitt suggests, is an appropriate starting point for discussing empirical investigations of curriculum change. Only then can we address the broader question of whether curricula are converging cross-nationally in postcolonial contexts. However, before asking what is going on in Ghanaian,

Singaporean, and Welsh CEC, it is first necessary to outline why these countries were selected to participate in the study to begin with.

1.5 Why Ghana, Singapore, and Wales

Wales, to a large degree, was a mandatory inclusion in this study, owing to the researcher's ESRC-funded focus on the *Curriculum for Wales* (2022), their being born in Wales, and their current residency in the country. The challenge was to identify two additional nations that would provide meaningful contrasts with Wales and with each other, to enable a rich cross-national comparison of how postcolonial nations shape citizens through curriculum reform. One approach used in comparative analysis, employed by Palinkas et al (2015:3) is to “cases with maximum variation for the purpose of documenting unique or diverse variations that have emerged in adapting to different conditions, and to identify important common patterns that cut across variations” (2015:3). For this reason, the principle that comparative research should involve meaningfully contrasting cases, drove participant country selection. The researcher sought to include only countries that contrasted meaningfully, which for this study, meant contrasting PESTLE⁴ contexts. For comparability however, participant countries had to be anglophone in orientation, a former British colony, and undergoing CEC reform or revision.

From an initial pool of fifteen eligible postcolonial countries, Ghana and Singapore emerged as the most analytically productive contrasts. Both nations share British colonial histories and have engaged in intentional nation-building through curriculum design and redesign, yet they differ markedly in socioeconomic development, political cultures, and educational orientations.

Ghana represents a context where empirical work on citizenship education is sparse, with existing literature dominated by historiography and commentary rather than direct curricular analysis. This gap offered an opportunity to generate original insights and address the continent-wide underrepresentation of African countries in major citizenship education studies. Singapore, by contrast, provided a highly developed, well-documented system with

⁴ PESTLE audits were conducted on Ghana (Appendix Two), Singapore (Appendix Three) and Wales (Appendix Four)

extensive scholarship on citizenship education, albeit often limited to regional comparisons. Its strong state-led nation-building agenda, coupled with abundant policy documentation, offered a counterpoint to Ghana's comparatively under-examined curriculum landscape. Together, the three countries, Wales, Ghana, and Singapore, form a strategically contrasting triad, balancing pragmatic factors such as document availability with the theoretical aim of examining postcolonial citizenship through curriculum reform.

1.6 Colonialism and Postcolonialism in Ghana, Singapore, and Wales

A key feature of this study is its examination of citizenship through the lens of education in postcolonial contexts. Although Ghana, Singapore, and Wales have experienced distinct historical trajectories, all three have been shaped by British influence and inherited educational systems, reflecting Western political and cultural traditions. Ghana, formerly the British Gold Coast, gained independence in 1957, while Singapore emerged from British colonial rule and subsequent nation-building processes following independence in 1965. Wales, although not formally a colony, experienced centuries of political incorporation into England. It was militarily annexed by the "English Crown in 1284 under a prerogative act known as the Statute of Rhuddlan (or Statutes of Wales)" (Great Britain. Parliament. House of Commons Library, 2026, 2026: para. 4), and subsequently incorporated into England through the Acts of Union between 1535 and 1542. Although Wales is not conventionally regarded as postcolonial, its experience shares important characteristics with postcolonial societies, particularly following devolution from Westminster in 1999, which granted increasing control over domestic policy, including education. These differing historical experiences provide important context for understanding how citizenship is conceptualised and taught within each setting.

In all three countries, education has played a significant role in transmitting ideas about citizens' rights, responsibilities, participation, identity and belonging. Colonial educational systems in Ghana and Singapore privileged English-language instruction, Western curricula, and institutional models that continue to influence contemporary schooling. In Ghana, colonial and missionary education established structures designed largely to serve

administrative and economic interests, while post-independence reforms selectively incorporated new international influences. For example, Mereku (2023: 489) identifies a shift in mathematics education from the pre-independence “British School Mathematics Project tradition” to the post-independence “American School Mathematics Study Group tradition”, while the development of social studies education has been shown to closely parallel developments in the United States (Dwomoh, 2019). Similarly, Singapore inherited a fragmented colonial education system divided among English, Chinese, Malay, and Tamil schools, and following Japanese occupation, the return of British rule, and eventual independence, education became central to promoting social cohesion, meritocracy, and national identity (Yong, 2019). Successive citizenship-related reforms, including Ethics, Civics, Education for Living, and Good Citizen programmes, reflect Singapore’s continuing efforts to define civic responsibility in a multicultural society. In Wales, education historically promoted English language, culture, and British identity, often at the expense of Welsh traditions and linguistic heritage. The 1847 *Reports of the Commissioners of Inquiry into the State of Education in Wales* (the “Blue Books”) exemplified this process by portraying Welsh society as culturally deficient and associating progress with anglicisation (Williams, 2025). Consequently, each country has had to adapt educational systems shaped by external influences while developing distinctive national identities and civic priorities. Examining these contexts comparatively therefore provides an opportunity to explore how ostensibly universal conceptions of citizenship, particularly those rooted in Western liberal traditions of rights, participation, and political membership, are interpreted, adapted, and contested within societies shaped by colonial or de facto colonial experiences.

1.7 Research Questions and Approach

Research questions should help narrow the focus of a research project and provide structure, playing a key role in the research design process (Kross and Guist 2019). The following research questions were devised for the overall purpose of the research, uncovering signs of curriculum convergence:

1. How is citizenship conceived within the national curricula of Ghana, Singapore, and Wales?

2. How have these conceptions changed during an era of accelerated globalisation (1991-2024)
3. Do these changes reflect convergence in the types of citizens these nations have sought to shape?

The overall purpose of these research questions was to establish whether, and if so, how, the countries' conceptions of the good citizen are becoming more similar. These questions seek to understand how CEC are changing during a period of accelerated globalisation. Subsequently a key consideration in the research was the suitability of the timing of this study. This is now discussed.

1.8 Background and Timing of Study

There are several reasons this is important and timely research. Firstly, in pragmatic terms, Wales are involved in an ongoing implementation of their new curriculum, a *Curriculum for Wales* (2022), and whilst there have been several studies to examine the associated curriculum documents directly (Gatley, 2020, Huckle, 2022, Lowri-Roberts, 2023), none were found to have examined it for conceptions of citizenship. The two countries selected for comparison, are also engaged in implementing new CEC. This being a key reason for country comparator selection.

Ongoing curriculum implementation in all three countries provides a timely opportunity to gain a better understanding of the *curriculum journey* the three postcolonial countries have made since Wales first launched its own CEC in 1991. Of particular interest is how conceptions of citizenship have evolved over that time as the countries have sought to build themselves during a period of accelerated globalisation, where globalisation, increased migration, and the rapid development of communications technologies have transformed citizenship and citizenship education in recent decades (Keating 2016). Furthermore, curriculum reforms present an opportunity to identify changes of course, in how a variety of citizenship related concepts and ideas are understood, omitted, included, and framed.

Domestically, there have also been events and processes that render this study timely and appropriate. For example, the nature of young people's citizenship is current amongst the

political parties in the UK, the media, and the British public. Additionally, Labour, with support from organisations such as *Vote16*, have called for the voting age to be lowered, while the Conservatives pledged a form of national service for 18-year-olds, should they have won the 2024 general election. There are also public concerns about, and growing attention being paid to curriculum prescriptions, with several demonstrations having recently taken place outside schools in Wales, e.g. “Protesters gather as Welsh Government taken to court over compulsory sex education” (Wales Online, 2024:1) on what exactly is included in the new curriculum. Although these demonstrations are primarily about the sex education component, it does demonstrate how the Welsh curriculum is under scrutiny not just by academics, but also by the public.

What becomes clear, is that there is a growing need for an unbiased and trustworthy investigation into what Wales, but also what Ghana and Singapore have actually included in their curricula documents in recent decades, regarding citizenship. The final section of this introductory chapter sets out the thesis structure, and includes summary findings for each chapter.

1.9 Thesis Structure and Summary Findings

Chapter One has articulated the research problem, explained the background and timing of the study, established its theoretical basis, research questions and approach, and outlined the overall thesis structure.

Chapter Two reviews how citizenship is defined, contested, and historically developed, tracing its evolution from classical republicanism through liberal and communitarian traditions to contemporary, globally influenced models. It establishes contemporary citizenship as a multidimensional concept that encompasses three core dimensions, *rights and responsibilities*, *participation*, and *identity and belonging*, and examines how globalisation and shifting political contexts continue to reshape national and postnational forms of citizenship.

Chapter Three, reviews empirical research of CEC, focusing on how rights and responsibilities, participation, and identity and belonging are conceptualised in national,

cross-national, and temporal studies. It finds a strong methodological bias toward textbook analysis and curriculum implementation, with limited systematic study of intended curricula, particularly syllabi, which it argues, most clearly reflect government intentions.

Substantively, across regions and over time, CEC tends to prioritise national cohesion, responsibility, and moral or economic utility, while political participation and rights-based citizenship are comparatively weak. Although global citizenship discourses have expanded, national frameworks remain dominant, indicating resilience rather than erosion of the nation-state and highlighting the need for global, cross-national–temporal syllabus-based research.

Chapter Four explains how the study employs an innovative cross-national-temporal approach to analysis, arguing this to be the most appropriate approach to establishing cross-national curriculum convergence, which in this case, related to conceptions of citizenship. The chapter justifies all methodological choices, data collection decisions, and analytical techniques. Crucially it also outlines how COVID-19 necessitated a redesign of the study, resulting in a robust, document-focused comparative approach.

Chapter Five shows that across Ghana, Singapore and Wales, citizenship curricula have increasingly prioritised *responsibilities* over *rights*, with responsibilities more frequently embedded in key curriculum structures and aims. At the same time, the types and scales of responsibilities have shifted, towards social/civic, familial, and individual decision-making, while rights have become more uneven, with Wales emphasising universal human rights, Ghana blending constitutional and human-rights framings, and Singapore largely omitting rights altogether.

Chapter Six illustrates how Ghana, Singapore, and Wales, have conceptualised, and increasingly sought to foster citizen participation in their CEC between 1991 and 2024, revealing broadly convergent approaches, though with varying intensity. It concludes that all three study countries have increasingly sought to shape socially participative citizens, whilst concurrently reducing political education and decoupling the notions of politics and participation almost entirely.

Chapter Seven shows how the citizenship dimension *identity and belonging* has increasingly been emphasised in all three countries. The chapter further elaborates on a shared transition that occurred in Ghana, Singapore, and Wales, regarding their understandings of identity

itself, where earlier nation-centric and monocultural approaches were replaced with a recognition of identity and belonging as a complex intersection of cultural, social, national, global, and individual identities. It argues that while national identity remains a central curriculum focus, the countries all exhibit a clear convergence towards multicultural and multilayered understandings of identity.

Finally, *Chapter Eight*, concludes the thesis, arguing that whilst Ghana, Singapore, and Wales show clear convergence in how their CEC emphasise rights, responsibilities, participation, and identity over time, the *meanings* attached to these dimensions have diverged substantially due to contrasting national contexts. Overall, citizenship remains framed primarily as a national project despite globalising pressures, illustrating a pattern of simultaneous convergence in emphasis and divergence in interpretation, where national resilience more than national erosion, best describes the transitions underway.

1.10 Chapter Conclusions

This chapter has outlined the research topic, background, and contextual framework. It then defined the research problem, objectives, and questions, and presented the structure of the thesis to guide the reader and provide an overview of the study. In particular, the chapter outlined plan for an exploratory, cross-national-temporal comparative study of how citizenship has been conceived in CEC documents from Ghana, Singapore, and Wales between 1991 and 2024, a period marked by accelerated globalisation. It positions citizenship as a contested, evolving concept shaped by competing philosophical traditions and national contexts, and argues that CEC (particularly syllabi) provide a valuable yet underused window into nation-states' intentions for citizen shaping. While research on citizenship education has expanded significantly since the 1990s, the chapter identifies a notable gap in empirical analyses of the planned curriculum, with scholarship tending instead to prioritise implementation, efficacy, and lived experiences.

Grounded in debates over national erosion, national resilience, and postnational citizenship, the study adopts a cross-national and historical approach to examine whether globalisation is producing convergence in curriculum conceptions of citizenship. Ghana, Singapore, and Wales are justified as meaningfully contrasting postcolonial cases undergoing curriculum

reform, offering rich analytical leverage. Overall, the chapter establishes the importance and timeliness for examining what citizenship curricula actually contain and how they change. It frames the central contribution of the thesis as clarifying whether, how, and to what extent national CEC are converging in purpose, emphasis, and underlying conceptions of citizenship amid domestic and global pressures.

Chapter Two: Citizenship in Theory and Transformation: Philosophical Foundations and Contemporary Challenges

2.1 Introduction

This chapter presents a review of the literature developed using a *theoretical-conceptual literature review approach*. The chapter defines and problematises the key concept (citizenship), reviews competing theoretical perspectives, traces the historical development of citizenship, examines contemporary debates, and finally, synthesises the literature into an analytical framework for understanding citizenship. Ultimately, the chapter moves from conceptual discussion to theoretical synthesis, producing a three-dimensional analytical model, which provides the basis for the subsequent empirical review of citizenship education curricula (hereafter CEC) studies in the literature (Chapter Three), as well as the study's central analysis of Ghanaian, Singaporean, and Welsh CEC (Chapters Five to Seven).

This chapter begins with an introduction (2.1), followed by a review of the key definitional challenges surrounding citizenship (2.2) and an exploration of its contested nature (2.3), outlining why scholars consistently regard citizenship as a “contested concept” (Lister,

1997:1, 2012:373, Kerr and Cleaver, 2004:7, Clegg, 2020:15), before addressing citizenship's inherent Western nature (2.4). It then traces the historical development of citizenship (2.5), from its classical origins to its contemporary diversity, highlighting major foci and traditions, before section (2.6) elaborates on the three main philosophical traditions and the dimensions of citizenship with which they are most commonly associated, liberalism and rights, civic republicanism and participation (political), and communitarianism and identity and belonging. In section (2.7), the historical focus is set aside and contemporary citizenship is considered through an exploration of national citizenship, globalisation and migration, and the effects of these forces on traditionally nation-bound understandings of citizenship, ultimately identifying the key contemporary issue on which the current study is focused, debates surrounding postnational and multilevel citizenship. Together, these discussions establish the conceptual foundations necessary for analysing Ghanaian, Singaporean and Welsh CEC. The chapter concludes (2.8) that, although citizenship remains a contested concept, rooted in competing philosophical traditions and challenged by contemporary domestic and international transformations, it is fundamentally constituted, albeit in different forms, by three core dimensions, *rights and responsibilities*, *participation* (social and political), and *identity and belonging*. It also provides the conceptual basis for understanding how other researchers have investigated CEC more broadly, as is the focus of the following chapter.

2.2 Defining Citizenship

It is generally acknowledged the main purpose of schooling is to shape future citizens (Kymlicka, 2001:293), yet a universally accepted definition of citizenship has evaded scholars, with some suggesting this will always be the case (Kerr and Cleaver, 2004:7). As Shklar observed, "There is no notion more central in politics than citizenship, and none more variable in history or contested in theory." (Shklar, 1991:1). Despite this inherent contestation, research on citizenship policy initiatives has "exploded" (Brooks and Holford, 2009:1) and due to this recent and energetic growth "the field of citizenship studies flourished" (Goodman 2023:136). This has meant the task of defining citizenship has arguably become more important, especially as particular conceptions of citizenship undergird programmes of citizenship education, which in turn influence the types of citizens schools ultimately shape.

Rather than simply being a device to assist the reader and delineate the research variables, defining citizenship goes to the heart of the research problem being addressed here, that citizenship is an example of what Gallie (1955) referred to as an “essentially contested concept” (Gallie, 1955:167). Gallie did not describe citizenship as an essentially contested concept in his paper of the same name, instead offering examples including art and democracy. Nevertheless, citizenship qualifies using his criteria, and has since been identified as such, by many scholars (Lister, 1997:1, 2012:373, Kerr and Cleaver, 2004:7, Clegg 2020:15), meaning there are multifarious often conflicting notions as to what it entails and how it should be defined. The contested nature of citizenship however is not a contemporary development, with Aristotle once asking, at arguably citizenship’s conceptual birth - Athenian democracy - “Who is the citizen, and what is the meaning of the term?”, before acknowledging “there may be a difference of opinion” (Aristotle, *Politics*, bk. III, 1995), in a sense, foreshadowing the continued contestation characterising debates about citizenship today (Falcke and Peters, 2025:5213).

It has been argued this contestation is in part due to competing philosophical traditions in which understandings are rooted (Fouts and Lee, 2005:20). Goodman (2023:136) added that recent “energetic growth” in this contested field of citizenship studies is due to citizenship’s increasing application in different fields, and associated methodological experimentation. Additionally, the challenges to traditional nation-bound conceptions of citizenship by globalisation (Green, 1997) and expanding rights claims within increasingly culturally diverse societies (Falcke and Peters, 2025:5214, Joppke 2021:1) have complexified the issue. Consequently, citizen-shaping in schools can be predicated on a wide variety of interpretations of what a citizen should be.

This is not to say however, that definitions of citizenship in the literature do not contain commonalities, they do. For example, citizenship is regularly understood as a status (McCowan, 2009:3) and as a practice (Ekman and Amna, 2012). In fact, common features of citizenship as a legal status of membership, as involving political and social participation, and as constituted by notions of identity and belonging, tend to feature in most definitions of citizenship, albeit in various compositions. A useful way of thinking about these views of citizenship is to conceptualise them along a continuum, where narrowly conceived citizenship is restricted only to legal status, but where wider conceptions consider issues of participation, belonging, and identity. Due to the centrality of citizenship’s contested nature to this research,

the next section explores briefly, perspectives on the question of why citizenship is a contested concept.

2.3 Citizenship as a Contested Concept

The field of citizenship studies has been described as a place where fundamental propositions were being contested and debated in important ways (Isin and Turner, 2002:2). Whilst there are many reasons for this, three central explanations have emerged, that citizenship conceptions are rooted in different philosophical traditions, that countries are undergoing rapid domestic and international transitions, and finally that such conceptions are contextually bound.

The first of these issues is that conceptions of citizenship are invariably rooted in different political traditions (Lister, 2007:8, Fouts and Lee, 2005:23), that hold different views on key citizenship issues. Lister (1997b:30) drew on notions of participation and membership as providing a bridge between a Marshallian liberal rights approach and civic republican positions, which she states, are two competing traditions. Oldfield (1990) described these traditions as citizenship as a status and citizenship as a practice. Communitarians may add citizenship as belonging. Consequently, political philosophical traditions underpin some of the key differences of opinion in the literature.

The main political traditions of liberalism, communitarianism, and civic republicanism share common features (e.g. they all involve a citizen-state dynamic), but they also differ in important ways. The liberal conception of citizenship is concerned with the individual, their private interests, and how governments should exist only to protect the rights and freedoms of the individual (Schuck, 2002). Civic republican citizenship stems from Ancient Greece, and whilst it also values freedom, it conceives of it differently (as freedom from domination). Civic republicanism also seeks to foster political participation, civic virtue, and public deliberation of the common good (Dagger, 2002), as opposed to a focus on private interests. Communitarianism also criticises liberalism's blinkered individualism, instead arguing for the importance of community, identity, and belonging. A key notion in communitarianism being that one's identity is shaped through their relationship with the community, necessitating a healthy community, and a sense of responsibility to the community (Etzioni, 2011).

The second reason citizenship is a contested notion is that many modern nations are experiencing rapid change, both domestically and internationally. Domestically, many countries are seeing additional rights claims on the state, as societies become more culturally diverse (Falcke and Peters, 2025:5214), challenges arise from societal changes including the reconfiguration of family units (from the standard heteronormative conceptualisation of family as 4.2 Children to diverse non-standard family arrangements), increasing political polarisation, including the rise of populism, and decentralisation (e.g. Devolution of UK) of political power. Societies are changing in many other ways too, social media, albeit a worldwide phenomenon is drastically affecting how people socialise, and patterns of employment are also changing rapidly.

Change is also increasingly being imposed from beyond the nation-state. The centralisation of political power in supranational bodies such as the European Union (van der Mei, 2019), alongside globalising neoliberalism (Mavelli, 2018), growing migration (Paparusso and Whitol-de-Wenden, 2025) instability and climate change (Burkett, 2011), and the rapid advancement of ICT, social media, and more recently AI (Formosa et al., 2025), have increasingly challenged traditional understandings of nation and national citizenship. Brexit - Britain's protracted exit from the EU - has further complicated notions of national citizenship in Wales, and most recently, the worldwide Covid-19 pandemic imposed unprecedented levels of changes in how society operates, particularly education (Hayward 2020:4).

The third reason for contestation, as Dominelli (2016:4) explains, is that citizenship is "context-specific", meaning understandings are dependent on the particular social, cultural, and political conditions of the location in which it emerges (Cloud Baars, 2014:23). Despite citizenship's abstract universality, it is:

...increasingly appreciated that citizenship is understood and experienced within specific national and local social and political contexts, reflecting historical traditions and institutional and cultural complexes" (Lister, 2007:55)

and so creates a myriad of conceptual interpretations.

In summary the key reasons citizenship is a contested concept, are that different notions of citizenship have roots in competing philosophical traditions, but also that nations are

experiencing rapid internal and external change, and that context matters. To examine the first of these point more closely, the next section outlines the historical development of citizenship, partly to establish a background to the phenomenon, but mainly as it permits an extraction of the key stances on citizenship and the different dimensions each stance generally seeks to foster (*liberalism and rights, civic republicanism and participation, and communitarianism and identity*).

2.4 Citizenship: A Western Construct

Although citizenship is a contested concept, increasingly applied in non-Western contexts, it remains fundamentally rooted in Western political thought. While alternative forms of political membership and belonging exist, the Western conception of citizenship continues to dominate both academic scholarship and educational practice. This is largely because contemporary understandings of citizenship emerged from a distinctly Western historical trajectory (Chung, 2017:439). Consequently, the adoption of citizenship in contexts such as Ghana and Singapore is not a neutral process, rather they entail engagement with, adaptation of, or resistance to normative assumptions embedded within Western political traditions that continue to underpin contemporary citizenship institutions and practices. Therefore, consideration of citizenship's Western origins is a key and necessary step when researching its application in non-Western contexts.

Citizenship's Western origins can be traced to Ancient Greece (Oats, 2014:24), and its application to the later Roman Empire and most recently, modern nation states. Falk (2000:5) further argues that "...liberal democratic states of the West..." were "...the main settings within which citizenship in its modern forms emerged". These origins highlight an important point that must be acknowledged, citizenship *is not* politically or culturally neutral, but deeply embedded within Western histories of governance, law, and participation. Its Western foundations are also evident etymologically, where the term itself derives from Anglo-French and means, "city-dweller" (Martinez Jiminez, 2020:91). Although non-Western forms of political organisation exist, including tribal, religious, kinship, and lineage-based systems, "modern citizenship is [nevertheless] western-centric" (Guo, 2022:480).

These origins have even shaped citizenship research scholarship. Isin and Nyers (2014:7) argue that social scientists long assumed:

...citizenship was a uniquely Western institution that not only explained the differences between despotic and authoritarian regimes in the East but also ostensibly explained why the West ‘took off’ and the East has stagnated.

This fostered “...the normative assumption of the Western conception of the political subject being superior to its Eastern counterpart” (Isin and Nyers, 2014:7). As a result, Western understandings of rights, participation, and membership have often been treated as universal standards against which alternative forms of political belonging are evaluated. Some scholars also link the global spread of citizenship and democracy to wider processes of Westernisation (Tully, 2008:461).

Furthermore, Westernised citizenship models have been promoted globally through international organisations, development agencies, and transnational education initiatives. For example, UNESCO’s promotion of Global Citizenship Education (GCED) has encouraged the incorporation of citizenship-related knowledge, skills, values, and dispositions into curricula worldwide (UNESCO, 2014). Similarly, international development actors have exerted significant influence over education policy in many African and Asian nations, through financial assistance, technical expertise, policy advice, and programme conditionalities (Knack, 2004, Edwards Jr, et al 2023). Mechanisms such as loans, conditionalities, technical assistance, and policy coordination have enabled organisations such as the World Bank to shape national education reform agendas (Edwards Jr, et al., 2023). Consequently, the global spread of citizenship education has been catalysed by significant Western influences, institutions, and normative assumptions, that they seek to perpetuate, knowingly or unknowingly.

In response, some studies have emerged that highlight efforts to de-Westernise citizenship. In this way, Guo (2022:480) identified three key challenges:

...the diversification of the subjects and contents of citizenship rights; ‘citizenship after Orientalism’, which advocates bringing oriental societies into citizenship studies; and ‘acts of citizenship’, which shifts the core of citizenship from rights to acts.

Together, these approaches encourage “...the study of citizenship from a wider range of perspectives” (Guo, 2022:480) and greater sensitivity to non-Western experiences of political belonging.

Finally, acknowledging citizenship's Western origins does not invalidate its use in comparative research. Rather, it requires a reflexive awareness of the concept's historical foundations and potential biases. Although citizenship is a global framework, its meanings and assumptions are not universally shared, making critical examination of diverse understandings of rights, responsibilities, participation, identity and belonging, an essential undertaking, one which the present study has embraced.

2.5 Historical Development of Citizenship

Historical accounts of citizenship are common (Marshall 1950, Kymlicka and Norman 1994, Arthur 2003). In the historical tradition, citizenship is conceived as having developed through several significant transitions, a process that has been referred to as a story of expanding rights (Marshall, 1950, KH Choi 2007). In this view, citizenship is not fixed but develops over time. Zajda and Majhanovich (2021:39) describe this history of citizenship as a:

...struggle with two questions: What does it mean to belong? [and] Who sets the rules of belonging”. This section outlines this history, from citizenship’s conception to contemporary interpretations, a journey from singularism to pluralism.

At arguably the beginning, Aristotle defined the citizen as “someone who rules and is ruled in turn” (Turner and Isin, 2002:106), a conception inseparable from political governance. Despite the exclusion of most Athenians from democratic participation, including Aristotle himself, this participatory understanding of citizenship influenced subsequent traditions from Rome to modern republicanism. Athenian citizenship was, however, highly exclusive, Bloom (1958:59) explained Greek thinkers believed inequality meant only a few could achieve the good life and thus qualify as citizens. As de Melo Maia and Pereira (2012:5) similarly observed, Greek and Roman citizenship excluded women, children, slaves, foreigners, and artists, making exclusion a persistent feature of citizenship debates.

This participatory but exclusionary approach informed classical republicanism, underpinning later republican traditions, and rested on the idea of the citizenry as an “autonomous polity” (Rubenstein and Addler, 2000:520), with sovereignty transferred from rulers to ‘the people’ as a collective. However, citizenship was largely confined to Athens and declined following Alexander’s conquests (Turner and Isin, 2002:106), only to re-emerge in the Roman Empire. Roman citizenship differed markedly from the Athenian model, as it was grounded in law and justice rather than direct political participation, enabling rights and protections across a vast empire. While some participatory rights existed, Roman citizenship functioned primarily as a legal status conferring rights such as property ownership, marriage, trade, and legal recognition (Bloom, 1958:59) permitting transit and trade across a vast empire.

Following Rome’s sacking in 410CE (Inglebert, 2020:245), citizenship was thought to have declined, replaced by feudal and Christian structures (Turner and Isin, 2002:107). Limited municipal self-rule later emerged before renaissance city-states revived republican ideals. These developments influenced the anti-monarchical revolutions culminating in US independence (1776) and the French Revolution (1789) during the Enlightenment (late 17th–early 18th centuries).

Through the late 18th and the 19th centuries, the industrial revolution enabled an expansion of capitalism. Liberal citizenship emerged during this period, as city-states became nation-states. This was also a period where national citizenship reached its zenith (Falcke and Peters, 2025:5213) and the Westphalian model of a world of nations emerged. Furthermore, World War II provided a global shock and a subsequent appetite for equality arose. In this setting, TH Marshall produced his highly influential essay *Citizenship and Social Class* (1950), in which he set out a theory of citizenship as a process of expanding rights entitlements, with civil, political, and social rights, emerging through the eighteenth, nineteenth, and twentieth centuries, respectively. He argued the development of rights through each century, was enabled by the growth of specific sets of institutions (Rees, 2016:4). Marshall’s (1950:28) theory ascribes a correlation between human dignity and full membership of a community, arguing citizenship to be a “status bestowed on all those who are full members of a community.” and that “All who possess the status are equal with respect to the rights and duties with which the status endowed”. Alluding to the powerful influence of context, Marhsall added:

There is no universal principle that determines what those rights and duties shall be, but societies in which citizenship is a developing institution create an image of an ideal citizenship against which achievement can be measured and towards which aspiration can be directed. (Marshall:1950:29).

In Marshall's theory, the development of *civil* rights through the eighteenth century was concerned with the principles of liberal democracy and the rights necessary for individual freedom, including freedom of speech, thought and faith, to own property, conclude valid contracts, and the right to justice (Rees, 2016:5). Legal institutions, including courts of justice were developed to protect citizens' civil rights. The nineteenth century saw an expansion of the right to participate, and with it a greater stake for citizens in the mechanics of democracy. Additionally, the spread of government bodies locally and nationally enabled the exercise of citizens' political rights. Finally, Marshall described social rights as necessary for full membership in a community. He argued a citizen is prevented from realising their civil and political rights unless they could access the minimum standard of social security necessary to do so. Particularly, he argued civil and political rights were mere abstract notions, to someone without the socio-economic means of accessing justice and or political decision making. Marshall believed capitalism had brought benefits, but also significant economic inequality, and viewed citizenship as an apt counterbalance to the excesses of capitalism and particularly to its propensity to isolate individuals in expansive modern societies.

Marshall's work on rights, argued that these phases of citizenship development reflected battles over citizenship status, that in turn reflected the concerns with British citizenship through these centuries. Marshall's argument that citizens should be entitled to social welfare, alongside their civil and political rights was progressive and reflected the mood of a postwar nation. It was also an acknowledgment of the apparent failure of classical liberal citizenship in expansive modern nation states.

Marshall's work on citizenship is not without criticism, however. Turner (1990:194) notes for example, citing Giddens (1982) that Marshall's theory has been criticized for its evolutionary perspective, failing to consider wider context, and for "perceiving the historical emergence of citizenship to be an irreversible process within contemporary society". Feminist critiques of Marshall's work tend to observe the exclusion of women and other minorities (Walby, 1994). Another key critique comes from the postnationalist school, who highlight the nation-

centricity of Marshall's work, arguing that citizen membership is no longer nationally restricted, and as such, that a nation-bound framework, is insufficient for understanding modern rights claims, and citizenship more broadly. (Soysal, 1994:136).

Nevertheless, Marshall's theory of historical development has influenced our understanding of citizenship, arguably more than any other contemporary theory, spawning not only criticism, but also collaboration and development, with those seeking to build on its central premise, like Janoski (1998) who developed Marshall's work to include a fourth category of rights, participation rights, and Hina et al (2011:41) who also argued for a fourth category, this time, "cultural and collective" rights.

Traditional ideas of citizenship were challenged in the late twentieth century, a period characterised by "accelerated globalisation" (Tomlinson, 2007:410, Tuncer, 2023:87). The 1980's seeing a key transition in the way citizenship was framed. Concurrently, disillusionment with liberalism and the harsh effects of capitalism were being recognised.

[The] liberal emphasis on distributive justice and individual rights works to divide the citizens of the modern state against one another, thereby fostering isolation, alienation, and apathy rather than commitment to a common civic enterprise (Dagger, 2004:172)

A rebuttal of liberalism is credited in part with establishing communitarian citizenship as well as prompting the revival in civic republican citizenship (Dagger, 2002). Developed in detail in the next section, both approaches arose in response to liberalism's supposed imbalanced focus on the individual and the capitalistic tendency in large modern societies to generate economic inequality. However, the key difference between civic republicans and communitarians lies in the latter's lament of the "erosion of community" (Dagger, 2004:171), while civic republicans are chiefly concerned with the weakening of active citizenship, particularly declining political participation and an increasing public disengagement from politics and democratic processes.

Concerns about falling community engagement, catalysed by Putnam's (1995) essay *Bowling Alone: America's declining social capital*, which drawing on Bourdieu's theory of capital, illustrated through many examples, the most notable being bowling itself, how Americans

social capital is declining. It was in this context, in the 1980s, that communitarian citizenship consolidated, and whilst communitarianism emerged generally only as a topic of interest among political philosophers, it did occasionally inform real world policy.

Most notably, Bill Clinton in the United States and Tony Blair in Britain appealed to communitarian concerns as they advocated policies meant to give as much weight to individual responsibilities as to individual rights. (Dagger, 2004:171)

This period also saw a renewed interest in the principles of classical republicanism, leading to neo-republicanism, which emerged to define a movement that was “preoccupied with extending practices of democracy, cooperatism, as well as the idea of freedom as non-domination” (Mulvad and Popp-Madson, 2022:99).

Contemporary citizenship can be said to be characterised by diversity, with many types understood to exist today, including but not exclusively; ecological citizenship (Dobson, 2006), 21st century citizenship (Cogan and Derricott, 2014), multicultural citizenship (Kymlicka, 2020), transnational citizenship (Fox, 2005), dual citizenship (Spiro, 2010), active citizenship (Johanson and Hvinden, 2007), neoliberal citizenship (Mavelli, 2022), gendered citizenship (Arnot, 2008), consumer citizenship (Jubas, 2007), cosmopolitan citizenship (Osler and Starkey, 2018) global citizenship (Dower, 2003), and in an apparent attempt to capture this diversity, multidimensional citizenship (Kubow et al., 2014).

There are simply too many conceptions of citizenship in the contemporary literature to detail and critique each one, though they all have one thing in common, they are all expressions of a postnational view of citizenship. This proliferation of forms of citizenship is in part a result of the transition of national sovereignty and the autonomy of national citizenship to forms of postnational citizenship, that due to increased migration, increasingly porous national borders, growing technological closeness of once unconnected societies, and growing civil and political rights challenges, along with other domestic and international challenges, increasingly sees citizenship as performed in locations beyond and not just within the nation state (Soysal, 1994). These different citizenship types, that in some capacity co-exist in contemporary societies, all reflect different responses to changes imposed by globalisation.

For example, Turner (2021) understood efforts to foster neo-liberal citizenship, and the consumer-citizen are two logical responses to the financialization of societies, and global movements that emphasise free-markets, privatisation, deregulation, and minimal state interference. Though permeated globally, neoliberalism has been criticised for the inequality it creates or ignores (Lane, 2023). The notion of the consumer citizen has also been criticized for presupposing “a weak state, and the decline of civic institutions, where the passive citizen becomes a consumer of privatised goods and services” (Turner, 2017:11). In these views, it is the market, Turner argues, not civil society, which becomes the setting for citizenship. This is important, as the view of citizenship as a counterbalance to the inequalities created by ‘the market’ is surely undermined by a conflation of citizenship and the market.

Another example is ecological citizenship (Curtin, 2002), similar to environmental citizenship, it is essentially concerned with moral or ethically based responses to climate change and ecological degradation by human activities, that seeks, in alignment with the sustainable development agenda, to address macro scale environmental and social challenges.

More recently, the notion of 21st century citizenship has emerged as a response to the rapid social and cultural change in modern societies (Cogan and Derricott, 2014). In this view, values such as critical thinking, global awareness, and sustainable development among other universal principles, lay emphasis on the skills citizens will need in an uncertain future.

In the present, accelerated migration and notions and realities of multinational, transnational, and dual-national citizenship have also emerged, in theory and practice. Tangibly this can mean dual passports, but ultimately it means that citizens are no longer bound to a single nation, and subject to *only* its laws, authority, and influence. Where once, a citizen of *Land A* had no access, physical or otherwise to citizens in *Land B*, this is no longer the case. Just a few examples, such as, intercultural marriages, economic migration, cheap international travel, the internet, and social media, all essentially mean the national-bound nature of citizenship is under threat, where citizens social, economic, and political interests are increasingly being located outside of the nation-state.

Perhaps the most widely applied recent citizenship type to emerge in the last twenty years, related to globalisation, is the rise of active citizenship. The tenuous link to globalisation, being, as countries populations have grown, participation in the political process, and

democracy more broadly, has not kept up. Evidence of falling political participation and growing political apathy have prompted concerns about the health of democracy and its potential longevity. Coupled to this, addressed above, were growing concerns about social participation and community engagement, which were also thought to be in decline. The solution, apparently, was active citizenship. Citizens needed to engage more in self-governance, in the classical republican sense, but also with their fellow neighbours and citizens in their communities, as social decline, like that articulated by Putnam (1995) was also considered in need of attention. Consequently, active citizenship has emerged as policy in various fields. A problem with active citizenship however, as we have seen with so many sociological concepts, is that it is open to a wide degree of interpretation as to what it is, and how, where, and why it should be applied. Nevertheless, as Lord MacLennan of Rogart asserted in a common's speech in 2010 (MacLennan of Rogart, 2010), active citizenship is today's buzzword, which whilst appearing positive at first, can be interpreted as quite disparaging.

Yet another type of citizenship to have emerged in recent decades is multicultural citizenship, which relates specifically to the growing cultural diversity within societies. As observed in Kymlicka (1995:Back Cover) the "increasingly multicultural fabric of modern societies have given rise to many new issues and conflicts, as ethnic and national minorities demand recognition and support for their cultural identity". Joppke similarly believes multicultural citizenship "signals a general concern for reconciling the universalism of rights and membership in liberal nation-states with the challenge of ethnic diversity and other ascriptive 'identity' claims." (2002:245). Multicultural citizenship then is an effort to recognise both the intentional harm and the symbolic violence imposed on minority groups, and account for those injustices by enabling all to claim citizenship, regardless of race, ethnicity, or religion, or indeed other classifications by which people are discriminated against. Multicultural citizenship is characterised by a focus on human rights, language rights, diversity, migration, and integration. However, it appears such integration is not as welcome by some contingents in some countries, who in many cases have retrenched into popularism and nationalism⁵.

⁵ Most notably, the USA under Trump, Argentina under Milei, and many others. Though Hungary's recent 2026 election defeat for the populist Victor Orban, could signal a reversal in the popularity of popularism.

Finally, the last two types of citizenship to be addressed here, have emerged in contemporary societies in recent decades, and are the most obviously postnational. They are global citizenship and cosmopolitan citizenship, and both overlap substantially with principles of multiculturalism, universal rights, and equality. The exact distinction between global citizenship and cosmopolitan citizenship has been heavily debated (Parekh, 2003) but is not of concern here, suffice to say however, they are both frameworks of citizenship that seek to imbue sovereignty in a world community, where national citizenship becomes, at least in their fullest and most extreme expressions, redundant. As mentioned earlier, multidimensional citizenship, devised in part in recognition of the many different perspectives on citizenship, emerged as yet another concept in an already contested field, albeit one that seeks to unify the others in some way.

In conclusion, this brief history has illustrated a key claim about citizenship, that broadly speaking, it has evolved from a unitary concept (albeit contested), applicable only to a single city-state, to a multiply understood, and highly differentiated concept, variously applied globally. Furthermore, that the institution of citizenship has evolved from its Athenian origins where classical republicanism was chiefly concerned with participation in self-governance, through periods of liberal citizenship, which concerned the rights and freedoms of the individual, to more contemporary forms of citizenship, primarily communitarianism, which acknowledge its affective dimensions of identity and belonging (Cloud Baars, 2014:24). Subsequently the next section explores these political philosophies in more detail, focussing on the development of rights (through liberalism), participation (via civic republicanism) and identity and belonging (in communitarianism).

2.6. Philosophical Traditions and the Three Dimensions of Citizenship

2.6.1 Introduction

This section sets out the three main political philosophies and the key dimensions of citizenship they developed. The difference between liberalism, civic republicanism, and communitarianism, and their corresponding models of citizenship, is that the former are

political philosophies, while the latter are their practical expressions in government policy. To understand these citizenship models, it is first necessary to outline the core ideas, similarities, and critiques of each philosophy, where broadly, liberalism prioritises individual rights, civic republicanism emphasises active political participation, and communitarianism focuses on shared identity and belonging.

2.6.2 Liberal Citizenship: *Rights*

Liberal Citizenship is premised on the philosophy of liberalism, most famously associated with John Locke and his works *Two Treatises of Government* (1689) and *Some Thoughts Concerning Education* (1693), but also with the influential writings of Rousseau, Hobbes, Jefferson, and Rawls. Liberalism is premised on the freedom of the individual, and an unobtrusive government, whose only role should be the protection of individual freedoms. In this view, all citizens are theoretically equal, because freedom is equality. Many states, including the USA, France, the UK, Australia, and Canada, are liberal democracies. Its key tenets include support for private property, universal rights, and limited constitutional government, as well as freedom from interference as a foundational principle.

Schuck (2002:132) described the principle of liberty has having been variously conceived. Drawing on Isaiah Berlin's *Four Essays on Liberty* (1969), he highlights negative liberty as freedom from interference as essential to classical liberalism, and positive liberty, which reflects the idea that freedom is incomplete unless one's social, economic, and educational needs are met, a principle underlying the distinct tradition of modern liberalism.

In *Two Treatises of Government* (1689), Locke rejected the idea that people were subjects of monarchs by divine right. He argued that humans possess rights, including life, liberty, and property, which exist independently of any particular society's laws. Locke used the claim that individuals are naturally free and equal to justify legitimate political authority as emerging from a social contract in which individuals "conditionally transfer some of their rights to the government" to secure their lives, liberty, and property (Tuckness, 2015:433)

The corpus of scholarship on liberal citizenship, includes TH Marshall's *Citizenship and Social Class* (1950), John Rawls's and his *Egalitarian Theory of Justice* (1971), Robert Nozick's *Anarchy, State, and Utopia* (1974), Ronald Dworkin's *Taking Rights Seriously*

(1977), and Bruce Ackerman's *Social Justice in the Liberal State* (1980), all of which Dagger tells us, came in for criticism for being too abstract and universalistic (2004:171). Though criticism has primarily focused on liberalism not sufficiently considering the role of the community. For example, Dagger (2002:152) was concerned “the liberal emphasis on individual rights and liberties has worked to loosen civic bonds and undermine self-government.”. Scholars, including, Sandel (1984) and Walzer (1990), have also contributed to this critique but from a communitarian perspective. Further significant criticism of liberalism arrived in the form of the feminist critique (see Nussbaum, 2021) which centred on the exclusion of women in a system that was inherently patriarchal. Though only briefly addressed, these examples show how deficient perspectives of liberalism and by corollary liberal citizenship led to interest for example, in civic republicanism, leading to a civic republican revival, addressed in the next section.

2.6.3 Civic Republican Citizenship: *Participation*

Firstly, it must be clarified that the focus here is classical and modern republicanism as well as civic republican citizenship, which are distinct from the US political party ‘the Republicans’. Although they share a common derivation in Western antiquity, they have diversified away from each other to mean very different things today, though they are frequently confused. To be clear the focus here is, classical and modern republicanism, which are long-standing traditions that have developed into political philosophies and theories of citizenship (Dagger, 2002).

It is first necessary to distinguish between classical and modern republicanism. Importantly in republican thought, “...the government of the state or society is a public matter, and the people rule themselves” (Dagger, 2002:146). These two conditions, Dagger argued, *publicity* and *self-governance*, underpin the republican philosophy, and further, that it is within these two conditions that more contemporary schools of civic republicanism contest the original philosophy. For example, in the classical formulation, citizenship was restricted to the public, which referred to “property-owning, arms bearing men” (Dagger, 2002:146 and 2004:168), whilst modern republicanism has had to evolve in response to the increasing rights claims from denizens and those who do not yet enjoy full citizenship (Falcke and Peters, 2025:5214), including women and minorities, children and young people (hereafter CYP).

Republican citizenship, be it classical or modern, centres on citizen participation in self-governance. Classical republicanism holds that citizens should participate directly in their own rule. Modern republicanism, by contrast, is grounded in the notion of representative government, which came about as a response to population growth, and viewed the goal of full participation in politics and democracy as unfeasible. The exact emergence of representative government, otherwise known as representative democracy, is a matter of debate, but the system has been in place in many western democracies for centuries.

On the transition from monarchies to modern republics, we turn to the enlightenment-era revolutions in France and the USA. These new states drew on classical republican ideas and rebuilt their societies around the principle that sovereignty lies with the citizens, not the monarch. This was supported by the idea of a social contract proposed and developed by Hobbes, Locke, and Rousseau (Morris, 1999). This historical shift is important as it highlights a central challenge for modern citizenship, that many people now feel apathetic and disconnected from political and democratic processes, particularly the young (Kerr, 1999:11/12).

A key difference between liberalism and republicanism, beyond the rights versus participation foci respectively, lies in the latter's conceptions of the common good. Broadly speaking, republicanism is concerned with the common good over individual interests, and where tensions emerge between the two, republicanism holds that the common good, following substantial public deliberation, be upheld.

Another key difference between liberalism and republicanism relates to freedom and how it is understood. The example frequently given is of the benevolent or indifferent slave master, under whom a slave, by virtue of not being interfered with by their master could be considered free, though they were still a slave. This liberal conception of freedom as non-interference, often termed the negative conception of rights, was challenged by civic republican thinkers like Pettit who argued, a premise that enables a view of slaves as free was absurd (Goldwater, 2020:133). Pettit argued the slave would remain dominated by the master, and so, freedom from domination was the only true form of freedom. Pettit's work is wide ranging, with *Republicanism: A theory of freedom and government* (1997) and *Freedom as nondomination. What is Freedom? Conversations with Historians, Philosophers, and Activists* (2021), in particular espousing Pettit's critique of freedom of interference and the promotion of the view of freedom as non-domination.

Republicanism consequently developed a focus on anticorruption, participation in democracy and public deliberation as mechanisms to guard against domination, and ensure citizens remain free in the republican sense. More recently, proponents of civic republicanism, and many others for that matter, have sought to foster active citizenship. Whilst not strictly a republican idea, active citizenship can be considered republican-aligned as citizenship in the republican view involves active participation in decision-making. This point was made by Gaynor:

Citizenship, within development education and more broadly, is not something which just exists; it must be claimed. Such claims involve struggles and tensions. In short, they involve activism. (2023:15)

Active citizenship through a civic republican lens is considered an antidote to the apparent growing political apathy across western nations (Dagger 2004), that the combination of growing national populations and the model of representative democracy, via processes of disenfranchisement have contributed to. The republican tradition ultimately promotes:

... citizens' obligations to participate in public affairs and points to a more active notion of citizenship, one that recognises the political agency of people and groups. (McClosky, 2019:17)

The central concern to republicans then, is participation in democracy, not just as a right, but as a duty, conducted by citizens with civic virtue, and where active citizenship is the tradition's contemporary call to arms.

Like liberalism, civic republicanism is not without critique, one of which, is that individual liberty may be sacrificed in a system of citizenship that prioritises a common good, as is the case in the republican tradition. Additionally, it has been argued that republicanism's principle of participation is simply unachievable in today's societies, consisting of tens and even hundreds of millions of citizens. On the contrary, civic republicanism, in its classical form was conceived for smaller societies, not even for nation-states, which came later. As Dagger notes, "A prudent republic will also be a small one" (2002:148). When this philosophy originated, those who devised it, quite understandably, could not predict the scale and complexity of modern societies, and so the principle that citizens should participate in

their own self-governance becomes more challenging as societies become more complex. Finally, where liberalism is fundamentally concerned with citizens' *rights*, civic republicanism has as its central concern, the *participation* of citizens in their self-governance.

At this stage it is prudent to introduce Westheimer and Khane's (2004) paper, *What Type of Citizen?* A seminal paper and key contribution to understanding citizenship, it proposes a typology of three citizen types, the *personally responsible* citizen, the *participatory citizen*, and the *justice-oriented* citizen. This typology allows us to classify and categorise CEC according to the type of citizen they seek to shape.

2.6.4 Communitarianism Citizenship: *Identity and Belonging*

Communitarian citizenship is unsurprisingly rooted in communitarianism, a political philosophy consolidated in the nineteenth century, which since the 1980s has gained currency as a result of the "so-called liberal-communitarian debate." (Dagger, 2004:167), although its antecedents stretch back to such east Asian philosophies of Daoism, Buddhism, and Confucianism. By contrast republicanism has its roots in western antiquity. Like republicanism, communitarianism promotes the value of citizen participation, albeit as an active member of the community (socially) rather than in an active role in government (politically) as in the republican ideal. To Bell:

Communitarianism is the idea that human identities are largely shaped by different kinds of constitutive communities (or social relations) and that this conception of human nature should inform our moral and political judgments as well as policies and institutions. (Bell, 2001:1).

Analogising that humans are more like social lions than solitary tigers, Bell (2001:1) argues that each citizen should seek to nurture the community of which it is part, as it is the community that "provide[s] meaning for our lives, without which we'd be disoriented, deeply lonely, and incapable of informed moral and political judgment." Communitarians hold a fundamentally different view of the nature of the individual, as Delanty neatly summarises:

Communitarians argue that citizenship is rooted in a culturally defined community, while liberals argue that citizenship rests on individuals and that therefore political community is derivative of its members, who are always individuals (Delanty, 2002:159)

In this sense, communitarianism, and republicanism, share ground in that the “emergence of communitarianism and the revival of republicanism in recent years stem from an uneasiness with liberalism.” (Dagger, 2004:167), specifically, its underpinning philosophy of individualism, arguing community plays a much bigger role in citizenship, particularly in relation to identity. Communitarianism contends a citizen’s identity is constituted in relation to the community (Delanty, 2002). Additionally, Dagger (2004) points out acknowledging their Latin derivations, that like republicanism, communitarians are:

...concerned with *communitas*, the common life of people who form a community, and republicans are devoted to the *res publica*, the good of the public. (2004:167)

Essentially, communitarianism concerns communities at all levels, where “communities are social collectivities, whose members are tied to one another by bonds of affection and by at least a core of shared values” (Etzioni, 2011:336). The nation can be considered a community in this sense.

A particular design, or framework for understanding communitarian efforts, is Diversity Within Unity (DWU), which is a “societal design” (Etzioni, 2011:340) that seeks to establish a tenable solution to the increasingly culturally diverse societies arising from historical and contemporary migration. Assimilative policies, aligned with ethno-nationalism, seek broadly to assimilate new individuals into the domestic-national culture, so much so, that one may not be able to tell their original country from their appearance and/or actions. On the other hand, fuller expressions of multiculturalism argue for nations free of unified national character (Etzioni, 2011:337), to allow constituent communities their own full expression as modifier of behaviour, provider of identity, and security, and the ultimate power to which the citizen submits. At the extreme end of this continuum, radical multiculturalists:

... argue that the state should strive for normative neutrality centred around the protection of rights that all share and should not foster a distinct conception of the common good and the particularistic commitments It entails. (Etzioni, 2011:337)

And that:

... the values to be promoted should be those that ease the said conflict. such as tolerance. diversity. rights and due process. (Etzioni, 2011:337)

DWU then:

... assumes that all citizens will embrace a core of values (the unity element) while being not just allowed, but welcomed, to follow their own subcultures on other matters (the diversity elements). The DWU thus differs from both radical multiculturalism (which maximised diversity) and full-blown assimilation (which maximises unity). (Etzioni, 2011:340/341)

Whilst there are substantive differences among liberal, civic republican, and communitarian political philosophies and by corollary conceptions of citizenship, it must be noted there are also broad overlapping themes. Additionally, just because liberalism is concerned with rights and civic republicanism, participation, this does not mean civic republicanism is unconcerned with rights, or that liberalism is unconcerned with participation, particularly modern liberalism. Furthermore, just because identity is the “very defining issue of communitarian citizenship” (Thun, 2016:27) it does not mean communitarian citizenship is unconcerned with rights or participation. On the contrary, these are central themes. This section has outlined the three main political philosophies of citizenship and in doing so has revealed their central concerns, rights (liberalism), political participation (civic republicanism) and identity and belonging (communitarianism).

2.6.5 Section Conclusions

Drawing from the central concerns of these three philosophical traditions we can understand citizenship to be three-dimensional, having developed the dimensions of *rights* (associated

with liberalism) *responsibilities* (with civic republicanism and communitarianism, whose foci are political and social responsibility respectively) *participation* in politics and democracy (civic republican) and although not solely associated with communitarianism, *identity and belonging*, which in their view is inextricably linked to community. The traditions outlined, provide a backdrop and context for the development of the three dimensions of citizenship. The next section describes the central contemporary challenge to such conceptions, particularly to national citizenship, however conceived - globalisation.

2.7 National Citizenship and Globalisation

2.7.1 Introduction

This section firstly outlines national citizenship, then addresses issues pertaining to globalisation, before considering the effects of globalisation on conceptions of national citizenship.

Debates about the nature and value of national citizenship in an era of accelerated globalisation are generally concerned (regarding the three dimensions of citizenship outlined) with whether the citizens' rights are determined, issued, and protected by national governments or by supranational declarations and conventions, namely the *Universal Declaration of Human Rights* (UDHR, 1948), and the *United Nations Convention on the Rights of the Child* (UNCRC, 1989) and universal principles of human rights and equality for all people. Whether, when and where citizens should participate, socially, and politically, and whether particularistic forms of national identity and community belonging, are under threat from assimilative forms of globalisation. The next three sections (2.7.2 - 2.7.4) delineate how two schools of thought have essentially been created, regarding how national citizenship is responding to such pressures. They are national erosion and national resilience.

2.7.2 National Citizenship

Citizenship in its traditional form is fundamentally a nationally bounded concept. As Soysal (1994:1/2, 1997:3) observed, citizenship "defines bounded populations, with a specific set of

rights and duties,” distinguishing members from non-members on the basis of nationality. While early polities were city-based, their expansion led to the emergence of the nation as the primary political unit. As cities such as Athens and Rome grew beyond manageable size, decision-making concerning industrial development, infrastructure, and education shifted from city-states to nation-states (Sassen, 2002:218).

Ultimately, national citizenship emerged concurrently with the nation-state as the dominant form of social and political organisation worldwide (Sassen, 2002:218). Within this framework, citizenship, and nationality, though intricately linked, are not viewed as identical. Sassen argued, nationality operates both domestically and internationally, situating individuals within a system of states, whereas citizenship is primarily a domestic institution concerned with questions of inclusion and exclusion within the national political community. Citizenship therefore delineates who belongs as a full member of the nation and who does not. Accordingly, traditional theories of citizenship locate it firmly within national political communities (Soysal, 1994:1/2, 1997:3, Hafner-Fink et al., 2013:867). In this view, citizenship is inseparable from the nation-state, and “by definition, modern citizenship has little meaning, except within the context of the consolidation and evolution of national states” (Brodie, 2004:324). Modern citizenship is thus oriented towards the nation as its central point of reference.

This national model of citizenship is grounded in the Westphalian system of sovereign states (Falcke and Peters, 2025:5213). As aforementioned, Westphalia established a world order based on territorially bounded states, each possessing sovereignty over a captive domestic population assumed to have limited political or social ties beyond national borders. This historical arrangement shaped both the development and the perceived stability of national citizenship. However, its continued viability has been questioned. As Osiander observed, scholars increasingly ask whether the “pillars of the Westphalian temple” are eroding and whether the international system is moving “beyond Westphalia” (2001:251). Such enquiries indicate concerns about the durability of national citizenship in an era of globalisation, where cross-border connections increasingly blur the boundaries of nation-states.

An important distinction to make when discussing national citizenship however, as national citizenship can be premised on different ideological nationalisms, is that of civic nationalism and ethno-nationalism. Civic nationalism emphasises allegiance to state institutions rather

than shared ethnicity or culture, prioritising equality before the law and accommodating social diversity (Gutmann, 1995). By contrast, ethno-nationalism defines membership along cultural or ethnic lines, with national boundaries that are “rarely coterminous with those of a sovereign state” (Faulks, 2000:4). In such contexts, citizenship tends to be allocated in exclusionary ways, reinforcing strict distinctions between citizens and non-citizens.

Understanding national citizenship is essential because it establishes the historical and institutional foundations of membership, sovereignty, and political belonging against which contemporary changes must be measured. Only by grasping how citizenship has been organised around territorially bounded states and nationalist ideologies can the transformative pressures of globalisation on these arrangements be meaningfully assessed.

2.7.3 Globalisation

This section reviews key interpretations of globalisation, highlighting its contested nature, multidimensional scope, and implications for the nation state, culture, and identity. A key point to make here is that the literature broadly agrees that globalisation is neither uniform nor straightforward. Green (2002:8) stresses that it is “hardly a seamless phenomenon” and, like capitalism generally, is characterised by uneven spatial and temporal development. In contrast, other scholars emphasise globalisation’s homogenising tendencies. Barnett and Cavanagh (2014:169) argue that economic globalisation intrinsically drives “the rapid homogenisation of global culture.” This position has been challenged by researchers who views globalisation as combining universality with local diversity, producing heterogeneous rather than uniform outcomes, such as Zajda and Mjhanovich (2021:2). In this sense, globalisation is increasingly understood as a differentiated process rather than a singular, homogenising force.

Another key point is that, historically, globalisation is not a new phenomenon, with claims tracing it back to the “dawn of history” (Chanda, 2008:119). However, contemporary globalisation, referred to as “accelerated globalisation” by Tuncer (2023:87) is seen as distinct in its scale and intensity. Green (2002:8) argues that the post-1970s period represents a qualitatively and quantitatively new phase, driven by cheap energy, transport, ICT development, and trade and financial liberalisation.

Definitions of globalisation vary but many converge on cross-border interconnectedness and are often economic in orientation. Green (2002:7) for example, defines globalisation as the rapid acceleration of flows of capital, goods, labour, services, and information, Gilpin (2016:3) highlights economic interdependence, while Tuncer (2023:85) foregrounds global interaction across economic, cultural, and social domains. Brodie (2004:323) also emphasises globalisation as a contested and historically unfolding set of interactions, and Tuncer's definition underscores that globalisation is not purely an economic phenomenon but can also be considered, political, social, and most commonly (economic aside), cultural.

In terms of culture, globalisation can be understood to have both assimilative and integrative effects. The concept of glocalisation, defined as "the interpenetration of the global and the local" (Ritzer, 2003:193) has even been posited to capture hybrid outcomes that are neither assimilative nor integrative, but combinative. While globalisation can provoke cultural revival and intensified national identities (Ang, 2014:10), these responses may also foster exclusionary nationalism (Frasin, 2012:37). This has contributed to models of "multiple or nested identities" (Ross, 2007:13), reflecting a transition toward multilayered understandings of identity in a globalised world.

It is also important to distinguish among the ideas of globalisation, globality, and globalism (Green, 2002:8, Scholte, 2002, Brodie, 2004). Globality refers to the condition of intensified global interconnectedness (Brodie, 2004:324), while globalisation denotes the process driving this condition. Globalism, by contrast, is conceptualised as a political ideology, particularly associated with neo-liberalism, prioritising market logics, and economic growth, often at the expense of public governance and national autonomy (Green, 2002:8, Brodie, 2004:324). As institutions of national citizenship contend with globalisation, debate continues over whether globalisation undermines the nation state and so leads to national erosion, or whether it prompts a counter response, thereby developing national resilience. The following and concluding section examines postnational citizenship, and the two theories put forward to describe how nations and national citizenship is responding to globalisation.

2.7.4 Postnational Citizenship and Globalisation

Globalisation's impact on national citizenship has been complex, uneven, and open to contestation (Brodie, 2004:324). Debates regarding the relevance of citizenship in an era of globalisation stretch back over three decades and have at their core, two opposing perspectives (Osiander, 2001:251, Schuster and Solomos, 2002:7, Brodie, 2004:323, Zajda and Mjhanovich, 2021:5, Falcke and Peters, 2025:5214). The first perspective views the legitimacy of national citizenship, as premised on the Westphalian model of the nation-state, (Osiander, 2001:251) to be eroding because of "accelerated globalisation" (Tomlinson, 2007:410, Tuncer, 2023:87).

In this view, the increasing interconnectedness among not only governments but also citizens of different nations, economically, politically, and culturally, challenge the monopoly of nation in citizenship. As noted earlier, Green (1997:169) pointed out that for:

...postmodern educational theorists, such as Usher and Edwards (1995), globalisation portends the demise of national education and the national education system as we know it.

Whether this extreme scenario awaits us, is a matter of debate but as Brodie (2004:323) acknowledged,

Globalisation is commonly linked to the erosion of the capacity of national states to exercise sovereignty over domestic policy and territorial boundaries or to buffer its citizens from an increasing predatory and unpredictable international political economy.

Similarly, Falk (2000:5) wrote of the effects of "global market forces" on "traditional conceptions of citizenship" premised on affiliation with the nation state, arguing that:

...the erosion of state autonomy and the emergence of arenas of decision and power beyond the control of the state have been weakening traditional bonds of identity between individuals and the state. (2000:5)

Regarding the central citizenship issue of rights, the development of universal human rights, along with the emergence of globally focussed supranational institutions like the World Trade

Organisation, the World Bank, the international Monetary Fund (IMF) and the United Nations (UN), are seen to effectively delegitimise the state as rights giver and sole political authority, whilst affording more legitimacy to the sovereignty of personhood (Falcke and Peters, 2025:5214) as an expression of universal equality. Concurrently however, processes of devolutionary governance, expanded rights claims, and cultural restoration emerged as bottom-up challenges to normative understandings of national citizenship. At its most basic, this perspective sees globalisation as a homogenising force that leads to economic, political, social, and cultural convergence among nations. Some theorists even predict the decline of the nation-state as the “primary unit of political organisation and loyalty” (Green, 1997:169), though others, notably Brodie (2004:323), argue that globalisation remains dependent on state power and consent. Brodie’s position leads us to the second perspective.

The second perspective, by contrast, views the nation state as resilient (Schuster and Solomos, 2002:7, Ricupero, 2008:144), acknowledges globalisation and its transformative capacity, but rejects the notion it will inevitably lead to the demise of the nation state and by corollary, national citizenship. Instead, Green argues, “nation states will remain the only viable sites of political representation” (1997:9). Zajda and Majihonovich (2021:5) describe these perspectives as “the ubiquitous processes of globalisation affecting everything” and the “...transformation and reaffirmation of nation-building, and cultural identities...”. Zajda and Majihonovich also suggest that a rejection of globalisation’s homogenising effects in some countries, resulted from “dominant political and religious ideologies” that sought to

preserve their historically defined identities, based on language, nationality, ethnicity, religion, territory, and other relevant identity-defining characteristics (2021:5).

The central argument of the first perspective, say Falcke and Peters, is that “...state-based citizenship has been gradually eroded by the rise of a transnational order” (2025:5214) where personhood assumes centrality over national affiliation. Scholars writing from this perspective, including the distinguished Yasemin Soysal, understand the traditional view of national citizenship, as demarked by physical borders, heterogenous populations, and the state as rights giver and protector, as being in transformation by globalisation, into postnational forms citizenship, defined by porous international borders and increased global migration. They argue, this leads to more culturally diverse populations, where citizens

identity and participation, are no longer territorially defined and confined, but where instead many hold deep economic, cultural, and political ties beyond the nation.

The first perspective of globalisation as homogeniser of particularised identity and culture, reflects postnational citizenship in that it emphasises the role of supranational forces.

Postnational citizenship is an umbrella term for all the forms of citizenship that have emerged in tandem with the recent acceleration of globalisation. The basic premise is that these forms of citizenship are a response to the challenges facing traditional nation-based models of citizenship. Sub-national and supranational transformations in how citizenship is located have fuelled these more recent understanding of citizenship.

Transnational citizenship can be conceived horizontally, where citizens navigate multiple national sets of rights and obligations of the modern nation-states to which they belong, and multilevel citizenship, can be considered vertical, in that citizens nationally determined rights and responsibilities are increasingly challenged by authorities both beyond, and within the modern nation state. Falcke and Peters (2025) describe these processes as supranational citizenship and subnational citizenship, respectively.

Supranational citizenship, such as that granted by the European Union, allows individuals to hold citizenship rights that apply to territorial jurisdictions that transcend nations. Conversely, subnational citizenship emphasises the role of regional or municipal authorities in defining membership, leading to disparities in how rights are distributed within a single country.” (Falcke and Peters, 2025:5214)

The key issue under investigation it has been argued, is that “...an era of postnational citizenship had emerged now that migrant rights depend not so much on citizenship but on territorial embeddedness” (Kofman 2005:454).

2.8 Chapter Conclusions

This chapter has demonstrated that citizenship is an essentially contested, historically developed, and contextually bound concept whose meanings, rooted in competing political philosophies, have evolved in response to contemporary globalisation. Drawing on a wide

body of scholarship the chapter has shown that the diversity of present-day conceptions of citizenship arises from the interplay of these philosophical traditions, profound domestic and global transformations, and the specific contexts in which citizenship is understood, experienced, and institutionalised. Rather than reflecting conceptual confusion, such contestation is intrinsic to citizenship itself, which has long been bound up with questions of belonging, power, and authority.

Through a historical and theoretical review, the chapter has traced citizenship's development from its classical origins to its modern and post-modern expressions. This trajectory reveals a movement from highly exclusive and participation-centred models of citizenship, through liberal expansions of rights within the nation-state, toward increasingly pluralised and multi-layered forms shaped by globalisation, migration, and supranational governance. While globalisation has undoubtedly destabilised traditional nation-bound assumptions of citizenship, the literature does not support a simple narrative of national decline. Instead, it highlights an ongoing tension between forces of erosion and resilience, with national citizenship being simultaneously challenged, reconfigured, and reaffirmed.

Crucially, despite its diversity of forms and interpretations, the literature reviewed leads to a foundational insight, that citizenship, however conceived, is generally structured around three core dimensions, *rights and responsibilities*, *participation (political and social)*, and *identity and belonging*. These dimensions are most clearly articulated through the philosophical traditions of liberalism, civic republicanism, and communitarianism, respectively, though no single tradition encompasses citizenship in its entirety. Contemporary forms of citizenship, including postnational, transnational, multicultural, and global variants, can be understood as a recombination and recalibration of these dimensions rather than their replacement.

Establishing this three-dimensional framework is central to the aims of the current study, as it provides a coherent conceptual lens through which CEC can be analysed, compared, and interpreted across different national contexts during a period of accelerated globalisation. The following chapter builds on this foundation by reviewing the empirical literature on citizenship education studies. Taken together, Chapters Two and Three establish the theoretical and empirical groundwork necessary for analysing how citizenship is included, omitted, and framed within the Ghanaian, Singaporean, and Welsh contexts examined in this study (Chapters Five, Six and Seven respectively)

Chapter Three: Citizenship Education Curricula in a Comparative Perspective: A Methodological and Empirical Review

3.1 Introduction

This chapter presents an empirical literature review of citizenship education curricula (CEC) research. It combines methodological review and conceptual analysis, to identify empirical, conceptual, and methodological gaps that justify the study's cross-national and temporal research design. Specifically, the review synthesises findings from a large body of empirical studies, compares methodologies across studies, identifies gaps in the literature, critiques existing approaches (e.g., overreliance on textbook analysis, lack of syllabus analysis, little holistic analysis of all three citizenship dimensions identified in Chapter Two), and develops a rationale and proposal for the current study.

3.1.1 Summary Findings

The review focussed on the conceptualisation of citizenship and its core dimensions (*rights and responsibilities, participation, and identity and belonging*) in research involving CEC

documents, in the form of single-country case studies, cross-national comparisons, and temporal analyses. Several key findings emerged.

Firstly, while many case studies provide useful methodological insights and contextual understanding, temporal and cross-national studies are especially important for identifying curriculum convergence. Cross-national studies help compare similarities and differences between countries' CEC, while temporal studies reveal how CEC changes or remains consistent over time. However, only three studies were found to examine CEC cross-nationally and temporally, simultaneously, an approach that is arguably essential for demonstrating curriculum convergence cross-nationally.

Secondly, most studies were found to focus on only one, or sometimes two citizenship dimensions (*rights and responsibilities, participation, or identity and belonging*) but rarely all three, which can lead to an incomplete understanding of the aims and nature of government intentions for shaping citizens. Most research focuses on a single dimension, as Lowri-Roberts (2023) did by focussing on identity in Wales's new *Curriculum for Wales* (2022), or commonly two, such as, Wohnig (2016) who examined responsibilities and participation, but omitted rights and identity, and more recently, Usmi and Murdiono's (2021) who addressed rights, responsibilities, and participation, but again no real mention of identity or belonging. Including all three dimensions in an analysis of citizenship education curriculum documents has the potential to illuminate the relationships between the dimensions, as well as the particular trade-offs that have occurred regarding what is to be included, omitted, and emphasised in the curriculum.

Additionally, it is important to check the intentions of national governments regarding all three dimensions, as government's intentions have not always been self-evident, though they are crucially captured in curriculum documents for researchers to decode, understand and compare, as is the aim of this study. The review therefore focussed on the intended curriculum, of which the current study has determined four broad categories: *textbooks, syllabi, curriculum frameworks, and policy texts*.

The review found much of the literature has investigated CEC via analyses of curriculum documents but disproportionately so, as textbooks are heavily relied upon, whereby syllabus analysis is relatively rare, generally used only to triangulate findings from other methods, to

address questions of curriculum efficacy (how citizenship education works in practice), or as part of curriculum coherence studies (how well curriculum components align).

By reviewing studies from diverse geopolitical regions including Europe, Asia, and Africa⁶, and including nations' postcolonial contexts, the chapter identifies key trends, including firstly that comparisons tend to involve only a handful of nations at a time, and secondly, that CEC tends to be restricted to intracontinental comparisons only. Such studies are very useful but perhaps less so when investigating truly global phenomena such as globalisation.

The key finding of the chapter, theoretically at least, regarding the issue of postnational citizenship, globalisation, and CEC reform, is that the influence of the nation remains strong, despite emerging forms of global citizenship education, often referred to as GCED.

Regarding the dichotomy proffered in the last chapter, this points to national resilience over national erosion, as more representative of the impact globalisation has had on national CEC. Together, these findings reveal important gaps and opportunities for research to combine cross-national and temporal approaches to understanding how conceptions of citizenship develop, diverge, or potentially converge across nations during an era of accelerated globalisation.

3.1.2 Chapter Structure

The remainder of this chapter introduces citizenship education (3.2.1), and citizenship education research (3.2.2) summarises its brief history (3.2.2), and its nature in a globalised era (3.2.4), in order to frame the latter part of the chapter. Section 3.2 reviews the empirical literature, presenting methodological insights for researching the intended curriculum (3.3.2), and explains the exclusion of document-free CEC research (3.3.3), using document analysis as triangulation (3.3.4), and highlighting an overreliance on textbook analysis (3.3.5). The final sections of this chapter separately review the approach and findings of studies that conducted national case studies of CEC documents (3.4) and cross-national studies of CEC documents (3.5). Within Section 3.5, Subsection 3.5.2 highlights the tendency for comparative analyses of CEC to be intracontinental rather than global, while sections (3.5.3-3.5.5) separately examine findings relating to Ghana and Africa, Singapore and Asia, and

⁶ Not included in the analysis were the Americas, primarily as the current study, necessarily requires an understanding of European, Asian, and African contexts but not that of the Americas.

Wales, and Europe, thereby concluding the review of cross-national comparisons. The following section reviews temporal analyses, defined as studies examining change over time within a single country (3.5), before Section 3.6 addresses the small number of studies combining cross-national and temporal analysis (3.7). The penultimate section, Section 3.8, synthesises findings through the lens of the three dimensions of citizenship identified in the previous chapter, with the concluding section summarising the chapter, identifying a research opportunity, and proposing a plan for research (3.9).

3.2 Citizenship Education

3.2.1 Citizenship Education

It is generally accepted that “schools play a key role in educating children for citizenship” (Kymlicka, 2001:293) and that in “most contemporary modern societies schools are obligated to provide citizenship education” (Geboers et al., 2013:158) either explicitly or implicitly (Kerr, 1999:8). Explicit citizenship education involves discrete subjects often titled citizenship education, but this is not a rule. Explicit citizenship education can also take the form of cross-curricula, integrated, and holistic provisions, the key determinant being its dedicated curriculum space and time. Implicit citizenship education on the other hand, tends to be informal, often relating to extracurricular and hidden curricula activity, where the former involves activity over and above the curriculum prescriptions, and the latter, informal and school specific activity, involving the cultivation of a school culture and ethos. The focus of the current study is the explicit curriculum, and so the review includes studies of citizenship education regardless of the mode of delivery (integrated, cross-curricula, discrete, holistic) of the provisions being investigated.

It has been argued a key transition in the fundamental nature of citizenship education is currently underway, where many countries are moving from a knowledge-based model, to skills-based model of citizenship education, as a response to uncertainty surrounding what skills citizens will need in the 21st century (Darmawan et al., 2025:527), though broadly they are considered to be “critical thinking, creativity, communication, and collaboration”. This is because the future has been thought of as uncertain and unstable, but also complete with

inherent opportunities. Subsequently many nations are now seeking to inculcate universal skills in their citizens, to deal with such global uncertainty. All three countries in the current study have either made or are making this transition currently (as of 2025), further rendering them suitable contexts for researching curricula transitions in a global era.

Despite being “a fundamental national aim of education” (Kerr 1999:8) different views exist on what citizenship education should seek to achieve. This is partly because citizenship itself is often positioned as a “panacea to solving problems confronting humankind” (Koku 2017:101). As established in Chapter Two, it is also because, citizenship is essentially contested (Lister, 1997:1, 2012:373, Kerr and Cleaver, 2004:7, Clegg 2020:15), philosophically deep-rooted in liberal traditions (rights and freedoms), civic republican traditions (common good and participation), and communitarian traditions (identity and belonging) (Lister, 2007:8, Fouts and Lee, 2005:20), undergoing rapid domestic and international change (Soysal, 1994:1/2), and is generally context dependent (Whitty 1999:1), where the citizenship education a nation develops, reflects its particular “cultural norms, political priorities, social expectations, national economic development aspirations, geographical political contexts and historical antecedents” (Kennedy, 2004:17). It is the particular mix and interaction of these factors, at local, national, and global scales, that in part, produce the diversity of programmes of citizenship education that exists today, as Kerr alluded:

Many of the differences in the definition of, and approach to, citizenship education across ... countries have arisen because of the interplay and influence of their broad contextual and more detailed structural factors. (1999:8)

Ultimately, the primary reason citizenship education is difficult to define is the “the continual diversities or elusiveness around the term citizenship” (Fouts and Lee, 2005:20) itself. An implication of which is that national programmes of citizenship education can vary considerably.

Broadly however citizenship education is thought to “encompass[es] the preparation of young people for their roles and responsibilities as citizens and, in particular, the role of education... in that preparatory process” (Kerr, 1999:2). While this may be uncontroversial, the conflicting views on what those roles and responsibilities should be, continue to justify

research into citizenship education, in order that we understand what type of citizens governments are attempting to shape at a given points in time. This needs to be done regularly, as curricula are being reformed ever more frequently, in what some commentators describe as a global “reform movement” (Sahlberg, 2016:128) or “curriculum reform and development trend” (Mitchel and Buntic, 2023:27).

3.2.2 Citizenship Education Research

Citizenship education research (also known as the field of Citizenship Education Studies) has developed as a multidisciplinary field concerned with how societies seek to cultivate informed, engaged, and responsible citizens through formal education. Over time, this body of scholarship has expanded beyond normative and policy-driven accounts to explore how citizenship is interpreted, enacted, and experienced within educational contexts. Additionally, and despite the different perspectives that characterise the literature on citizenship, a concern has arisen over the need for more effective citizenship education (Geboers et al., 2013). Consequently, much related research has focused on curriculum efficacy and curriculum coherence, where the former concerns questions of whether citizenship education actually works in addressing the myriad of problems it has been proposed to resolve, and the latter, whether the skills, knowledge, and abilities that citizens actually acquire, are those that were intended. Furthermore, citizenship education research is in transition, post interpretivist turn, towards a research agenda increasingly concerned with teachers’ and pupils’ subjective experiences and interpretations of curricula and related issues. However, it must be asserted that CEC documents, i.e. the intended curriculum, should remain an important focus for empirical investigation, primarily as citizenship education can tell us a lot about the socio-political development of a country, especially in postcolonial countries, particularly as they engage with contemporary globalisation. The following section outlines a brief history of citizenship education before contextualising contemporary citizenship education in the global era.

3.2.3 Brief History of Citizenship Education

Historically, citizenship learning occurred informally within small communities and as part of family traditions (Filonik et al:2023:2), before becoming an explicit school curricular aim

centred on preparing young people to be good citizens of the state. In its earliest forms, citizenship was learned through participation in communal life rather than through formal instruction, and “reciprocity and mutual aid (or mutual reliance), whether appearing in horizontal or vertical social relations” was the “common pattern of normative behaviour in ancient civic communities” (Filonik et al., 2023:2). However, the origins of what we may understand citizenship education to be today can be traced to “Greece during the Archaic Age (776–479 BC)” (Oats, 2014:24). Modern forms, such as democratic citizenship education, emerged in nineteenth century (Olgun Baytas, 2021:18), representing a key transition in the history of citizenship education, from informal socialisation towards more intentional preparation for civic life - as designed by the state, and not the community, family, or city. As schooling became institutionalised in the late 19th and early 20th centuries, citizenship education took on a formal role within education systems providing reformers a “powerful tool” to shape future citizens (Giudici, 2026:4). The concept of citizenship education in the twentieth century was initially used as a vehicle for moral and religious training, but was adopted more fully as countries prepared for the “Brave New World [that was] to follow the war” (Best, 1960:100).

In the 20th century, after WW1, Best (1960:100) claimed progressive citizenship education was embraced as a “willing and competent” vehicle, government could deploy to tackle the social and democratic challenges that faced countries engaged in national reconstruction. During this period, theoretical developments further anchored citizenship education within the formal purposes of schooling. For example, Marshall’s (1950) work on a social rights helped connect education with equality, and full social membership, as a key social right, and an imperative also for the state, in order to have an influence in shaping future citizens (Hoxsey, 2011:918). For much of the twentieth century, these developments remained firmly national in conception, with citizenship education oriented towards social cohesion, democratic participation, and loyalty within the bounded nation-state. This nationally framed understanding reflected a pre-globalisation context in which political, economic, and cultural life was largely conceived within domestic borders, though, in the 1970s and 1980s, concern grew over globalisation and the ways national models of citizenship respond, leading, among other developments, to the emergence of Global Citizenship Education (GCED) as a framework for schools (Demir, 2021: 60) to address these changes.

By the late twentieth century, citizenship education expanded beyond its traditional national focus. Globalisation has brought challenges linked to migration, multiculturalism, and intensifying economic interdependence, prompting the study of its inclusion, omission, and framing in many nations' CEC (Leek, 2016, Demir, 2021, Beribe, 2023, McClosky, 2023). By the early 21st century, citizenship education had proliferated into a variety of forms, and had come to be regarded as the central purpose of schooling (Deng, 2012), even though defining and conceptualising citizenship remained a challenge due to its contested and multidimensional nature. This centrality reflects citizenship's formal institutional status and its expanding scope. More recently, Zhong and Zeng (2023:1) argued, the current era is one of digital citizenship education, where the aim is to "transform children from digital natives into qualified digital citizens". This marks a further diversification of citizenship education in response to technological and societal change both within and beyond national borders.

3.2.4 Citizenship Education in a Globalised Era

Globalisation can be considered the most significant challenge or catalyst for change to citizenship education since its formalisation into national curricula. To Kerr (1999:2) these challenges facing modern nations derive from the "unprecedented level and pace of global change at the end of the twentieth century" and so if schools are to effectively prepare pupils for the future they must acknowledge and address:

- the rapid movement of people within and across national boundaries
- a growing recognition of the rights of Indigenous peoples and minorities
- the collapse of political structures and the birth of new ones
- the changing role of women in society
- the impact of the global economy and changing patterns of work
- the effect of a revolution in information and communications technologies
- an increasing global population, and
- the creation of new forms of community (Kerr, 1999:9)

These global transformations provide a rationale for why traditional, nationally bounded models of citizenship education have come under increasing pressure. The extent to which these changes have impacted CEC design is up for debate, what is clear however, is that

recently, "...discourses of citizenship have been influenced by globalisation" (Abowitz and Harnish, 2006:653), but also that those discourses range themselves, in terms of their objectives, as Wahlstrom (2018:588) alluded to, with the somewhat rhetorical question "Recognizing globalisation, but from what perspective?". Though, it was contended that:

... 'transnational' and 'critical' discourses have yet to significantly challenge the dominant discourses that shape citizenship education in schools." (Abowitz and Harnish, 2006:653)

Taken together, these arguments suggest that while globalisation has reshaped the context of citizenship education, its configuration into CEC remains uneven and contested.

Nevertheless, much of the recent theoretical and empirical literature draws on citizenship education and its global orientation (Gopinathan 2012, Hartung 2017, Goren and Yemini, 2017, Howard et al 2018). Of relevance to this investigation is the empirical research that employs citizenship education curriculum documents directly, in order to understand these global orientations in the curriculum. Several such studies in the form of systematic literature reviews (Goren and Yemini 2017, Hou, 2020) have sought to establish a better understanding of the different national provisions of Global Citizenship Education (GCED), as this becomes a feature not just of national provisions of citizenship education but also much of the research (Moon and Koo, 2011, Alviar-Martin and Baildon, 2016, Swanson and Ashby, 2016).

Many nations are increasingly responding to globalisation by way of including globally oriented aims and content in their curricula. These approaches are often labelled, Global Citizenship Education (GCED), though not always. Regardless of the program title, Dill (2013:4) suggests there are two broad approaches, the "global competencies approach", which aims to develop in pupils the skills required to thrive in a global society, and the "global consciousness approach", which aims to foster in pupils a global orientation, empathy, and cultural sensitivity. This is an important distinction, as it suggests some nations are shaping citizens according to the fundamental principles associated with universalist notions of global citizenship, where others are more pragmatically concerned, not with developing global citizens, but with resilient national citizens, capable of surviving and thriving in a global society, or perhaps more accurately, a global economy. This distinction shows globalisation has not resulted in a singular shift, but has rather prompted divergent curricular responses to such global pressures.

Many nations are increasingly responding to globalisation by incorporating globally oriented aims and content into their curricula, often through programmes grouped under the umbrella of Global Citizenship Education (GCED), which combines elements of global education and citizenship education (Davies et al., 2005:66). However, Dill (2013:4) argues that there are two broad approaches to GCED: the *global competencies* approach, which seeks to develop the skills required for pupils to survive and thrive in a global society, and the *global consciousness* approach, which aims to foster a global orientation, empathy, and cultural sensitivity. This distinction is significant because it suggests that states respond to globalisation in different ways. Some seek to cultivate citizens according to the humanitarian principles associated with universalist understandings of global citizenship, while others adopt a more pragmatic approach, focusing on developing resilient national citizens who can succeed within an increasingly globalised society and economy, but who's loyalty rests with the nation. As such, globalisation has not produced a singular curricular response but has instead generated divergent educational approaches shaped by differing national priorities.

However, GCED is not without critique, however. For example, Howard et al (2018:498) “argue that global citizenship education serves a means for reinforcing Western values, norms, and ideas”, and that the real challenge for GCED research seems to be the widespread problem of how to “promote common and collective identity, participation, and interests while respecting differences” (2018:499). These critiques expose normative tensions at the heart of GCED, particularly regarding power, representation, and universality.

Highly useful to the current study, and a key contribution to the field of GCED studies is *Globalisation and Curriculum*, in which Anderson-Levitt (2008) posed three significant questions regarding the impact of globalisation on citizenship education research. The three questions represent a rare attempt in the literature to break down what is required to study curriculum convergence, by question. The questions, complete with Anderson-Levitt's (2008) rationale, are quoted in full below:

The first question needs to be, “What is actually going on?” That is, how are curriculum and instruction organized in different places across the globe? Although comparative research usually assumes that there are important differences among countries, other people often assume that globalisation means increasing homogenization. Thus, a second question is, “Are curriculum and instruction in fact

becoming more similar around the world?” Whether curricula are converging or diverging a comparative perspective helps answer a third question, namely, “How have we come to teach what we teach and to teach as we do?” Specifically, a global perspective lets us ask how national and regional contexts shape curriculum and how worldwide movements and power struggles have had an influence on what we teach. (2008:349)

The significance of this Anderson-Levitt (2008) contribution is that it seeks not merely to document globalisation’s impact on curricula but to ask if it is leading to curriculum convergence. This is a question that aligns with the current study, and its guiding research questions; how is citizenship conceived in Ghanaian, Singaporean, and Welsh CEC? (RQ1), how if at all is this changing? (RQ2), and are conceptions of citizenship in these postcolonial nations converging? (RQ3). This is important, as whilst some believe globalisation means inevitable cross-national convergence, Whitty (1999) cautions against this assumption, arguing that “...contextual specificities are at least as significant as any broader cross-national developments” (Whitty 1999:1). What we do know, is the relationship between globalisation and convergence remains contested, hence the current study.

3.3 Review of Citizenship Education Studies

3.3.1 Introduction

Curriculum studies (including those of CEC) often conceptualise curriculum along a continuum from narrow notions of prescribed content to expansive understandings of learners’ total experiences, but methodologically this breadth poses challenges for empirical enquiry. A widely used analytical framework distinguishes between *intended*, *implemented*, and *attained* curricula (Thijs and Van den Aker, 2009:10), clarifying where evidence can be found in the curriculum process, and what claims can legitimately be made.

This study situates itself firmly at the level of the *intended curriculum*, focusing on official curriculum documents as primary data to interrogate governmental intentions in shaping

citizenship, across national and historical contexts. Methodologically, this choice responds to a crowded field in CEC research that increasingly prioritises implementation, efficacy, and coherence through interpretivist approaches centred on teachers' and pupils' experiences. While valuable, such approaches often relegate curriculum documents to a triangulatory role, obscuring what can be known from the intended curriculum itself. By foregrounding direct, systematic analysis of curriculum documents, specifically syllabi, the current study adopts a clarified methodological stance that seeks to isolate and analyse government intentions rather than conflate outcomes or enactments.

3.3.2 Intent and the Intended Curriculum

The intended curriculum assumes that syllabus documents embody governments' educational intentions. This study therefore treats syllabi as authorised expressions of governmental intent, focusing on the published policy text rather than the curriculum development process or individual contributors' motivations. The methodological implications of this approach are discussed in Section 4.8.2.

3.3.3 Researching the Intended Curriculum

Curriculum studies and related fields have seen many attempts to define their core concept - curriculum. A helpful way of classifying definitions of curriculum is by considering the continuum of narrow to wide curricula. Lunenburg (2011:1) addresses this continuum telling us that some define curriculum (narrowly) as "a formal course of study, emphasising content or subject matter" while others suggest it is "the totality of experiences of each learner" which registers at the wider end. In this sense the current study is restricted to the intended curriculum, it registers at the narrower end of this continuum.

A second, and arguably more useful distinction in curriculum research concerns the different types of curricula that make up the overall curriculum process. These are typically understood as part of a three-stage process. (English, 1978, Levin, 2001, and Thijs and Van Den Aker, 2009:10).

Firstly, and crucially the focus of the current study, is the *intended curriculum* (Thijs and Van Den Aker, 2009:10). also known as the planned and prescribed curriculums. The intended curriculum refers to the physical plans (now commonly in digital format) for teaching and learning, and is the first stage in the curriculum process – to the degree a circular process can have an ‘first’ stage (Thijs and Van Den Aker, 2009:10). Such plans have been examined by many researchers, for example, Merey (2012) and Sautereau and Faas (2023) both of whom focus on the intended curriculum in their studies. The second stage of the curriculum process is commonly called the *implemented curriculum* (Thijs and Van Den Aker, 2009:10). also known as the taught and enacted curriculums. Researchers investigating this stage are broadly concerned with actual teaching, as well as teachers’ subjective interpretations (Evans, 2006, Osler, 2011, Patterson et al., 2012, Akdag, 2021, Pala, 2023, Wu and Tse, 2025). The final stage of the curriculum process involves enquiring into what students have actually learned, and so logically referred to as the *attained curriculum* (Thijs and Van Den Aker, 2009:10), also known as the received curriculum. This type of research generally involves enquiries into what students have actually learned as well as their subjective interpretations of related topics (Sandstrhom et al., 2010, Fournier-Sylvester, 2014, Wood, 2014, Olson, 2015, Heathcote, 2017, Saha 2020, Ten Dam et al 2020, Dansholm, 2022).

Levin (2008:9) used the slightly more elaborated, “origins (where do[es] policy come from), adoption (from an idea to a decision) and implementation and outcomes (results, intended or not, of decisions)” and many others employ different terminology again, though it was felt, particularly as this study is interested in the intentions of governments for shaping citizens, that Thijs and Van Den Aker’s (2009:10) phraseology be adopted. Consequently, the three stages of the curriculum process are hereafter referred to as the *intended*, *implemented*, and *attained* curriculums.

It must also be clarified that the focus of the current study is exclusively the intended curriculum, and so subsequently, is the rest of this review. Although curriculum is understood as a three-stage process, and while issues of implementation, and attainment, and the experiences of teachers and pupils are major areas of contemporary research, they lie outside the scope of the current study, which instead, addresses the essential task of analysing intended curricula, not only within individual national contexts but also through cross-national comparison and across different historical phases in the development of citizenship

education, essential tasks if one is to understand a country's place in its postcolonial curriculum journey.

However, much contemporary CEC research is concerned with questions curriculum implementation, efficacy, and coherence, where curriculum implementation relates to the enactment of curricula in school settings, curriculum efficacy concerns questions of whether citizenship education actually works in addressing the myriads of problems it has been proposed to resolve, and curriculum coherence concerns questions of whether the skills, knowledge, and abilities that citizens actually acquire are those that were intended.

In studies of curriculum efficacy, the primary sources of data are often the subjective interpretations and experiences of pupils (Sandstrhom et al., 2010, Fournier-Sylvester, 2014, Wood, 2014, Olson, 2015, Heathcote, 2017, Saha 2020, Ten Dam et al 2020, Dansholm, 2022) and teachers (Evans, 2006, Osler, 2011, Patterson et al., 2012, Akdag, 2021, Pala, 2023, Wu and Tse, 2025), and sometimes both (Yoshino 2024). The aim is generally to determine whether the curricula have achieved their objectives. Such studies can be considered a response to an earlier real or perceived imbalance in curriculum studies, where experiences of pupils and teachers were not taken into account. Since the interpretivist turn, this appears to have changed with many studies examining the perspectives of pupils and teachers. Other studies specifically address the efficacy or otherwise of citizenship education provisions. For example, Keating and Janmaat, (2016:424) used path analysis of CELS⁷ data, to show political-based activities in school, do have a positive impact on “electoral and expressive political engagement among young people in England”. The jury is still out regarding this essential question of whether citizenship education works.

The related issue of a *coherent curriculum*, where coherence “entails unity and connectedness among the aims, content, instructional practices, learning experiences and assessments” (Sullanma et al., 2019, p.210) has also spawned a lot of research attention, with curriculum coherence studies examining the degree of coherence among the different components of a curriculum. Two such examples found in the review include Mathebula (2009:iii) who found:

⁷ CELS is a longitudinal study of citizenship education in England 2001-2010

... post-apartheid citizenship education policy lack of conceptual clarity, coherence and consistency [and] can be attributed in large part to the conflicting forms and conceptions of citizenship in South Africa.

And also in Africa, Ghebru and Lloyd's (2020:1) study of Ethiopian curricula found "inconsistencies in the materials between the stated aims of the CEE program and the textbook content itself". Also, pertinently to the current study, given the overlapping focus on Wales's new curriculum, is Gatley's (2020) paper, which questions the compatibility of two features of that holistic curriculum, the *Four Purposes* (syllabus aims), and the *Areas of Learning and Experience* (AOLE) which addresses content. Gatley argues AOLEs will become "redundant" if the curriculum is "entirely driven by the four purposes" (2020:202). The other type of study that commonly examines CEC documents, but again only nominally, are *implementation studies*, which generally examine the last stage of the curriculum process - its enactment in school settings. Studies such as Evans's (2025) reflective paper on the early implementation phase of Wales's new curriculum, and Stewart's (2023:172) analysis of children's rights in that same curriculum, and Mickovska-Raleva's (2019) analysis that examined the implementation of Macedonian civic education, as well as Hameed et al's (2023) paper comparing GCE in Singapore and Australia, all explore the nature of curriculum implementation processes, challenges, and opportunities.

Before moving onto an explication of the review's findings regarding conceptions of citizenship and its dimensions in national CEC, it is important to explain a key feature of the empirical literature, regarding the methodological approaches commonly employed by researchers, and that is essentially that many studies of CEC do not actually involve analysis of official curriculum documents at all, despite said curricula being the focus of their research. Examples include McAllister's (1998) paper on civic education in Australia, Garba's (2015) paper on social studies in Nigeria, and Wang and Print (2024) study of Singaporean citizenship education. Such studies are only addressed here to highlight the difficulty faced in ascertaining what research has actually analysed curriculum documents, and furthermore, what findings can be attributed to what research activity.

Other cases do include the analysis of curriculum documents, but often in combination with other approaches, such as, historical policy analysis, interviews with policy makers and curriculum makers, literature reviews, and more. Such studies show that curriculum

documents, and particularly syllabi are frequently employed only to triangulate findings from other methods, meaning studies often conflate findings from multiple sources. Because these sources are often combined without clear separation, it becomes difficult to determine which findings originate specifically from the curriculum documents (i.e., the intended curriculum) and which come from other data. For example, Wainaina et al., (2011:179) combined analysis of “education syllabi and curriculum documents” with analysis of “government policy documents, as well as political statements, speeches, development reports, technical commission reports, media articles, research publications, and reports”. Similarly, Perveen and Awan’s (2017) analysis included curriculum documents but also, policy documents, textbooks, and the views of teachers. More recently, Thaiyalan and Choo (2024:1174) combined analysis of Singaporean curriculum documents with that of “political speeches [and] press releases”. This methodological blending can obscure the unique contributions of textbook or syllabus analysis.

Sometimes the specific syllabi are cited but addressed only as the topic of discussion, rather than data to be analysed, consequently it can be unclear whether they have been analysed at all. An example is Hung’s (2015) paper on the 2010 Taiwanese citizenship curriculum. To be clear, this is not a criticism, as detailed analysis of CEC documents was not their goal, but it does illustrate the challenge in discerning findings from studies involving CEC. Whilst these studies are valuable, such approaches often complicate efforts to understand the intended curriculum in isolation (the goal of the current study). Another type of study found in the review, that again employs curriculum documents, but not necessarily as a central feature of the research, was Sinnemma et al’s (2020) discussion of “challenges and opportunities” presented by Wales’s new curriculum. In such studies the curriculum features as a kind of onramp to other discussions, rather than the focus on analysis itself.

Of much more relevance to the current study are examples of research that empirically analysed curriculum documents directly, where curriculum documents fell into one of four categories: *textbooks*, *syllabi*, *curriculum frameworks*, and *guidance documents*.

Textbooks dominate the empirical research of CEC. Many studies position textbooks as the central data source, with syllabi often only employed to check stated curriculum aims, against which other materials are examined for coherence (Mathebula, 2009:iii, Ghebru and Lloyd, 2020:1). Similarly, syllabi are frequently only used as a means of triangulating findings from

other methods. Nevertheless, textbooks far outnumber the other three categories of curriculum document in terms of representation in the empirical research.

Usefully, textbooks have also been used to track change over time, as in Tooth's (2008) analysis of Manitoban History, Civics, and Social Studies textbooks from 1911 to 2007, and Kwan-Choi Tse's (2011) comparison of 1997 and 2005 Chinese textbooks, as well similarity and difference cross-nationally, as in Kotowski's (2013) comparison of US and German social studies textbooks. Ultimately textbooks appear to be the citizenship education researcher's preferred choice of data for analysis. This makes sense for qualitative researchers who value the rich data, and quantitative researchers, for whom a textbook provides a complete, and voluminous text for producing comparative data. Other studies address curriculum frameworks and policy documents, for example, Engel's (2014) combined analysis of Spanish curriculum, and associated materials, however many more, possibly even a majority, employ textbook analysis. The following list illustrates this point, highlighting how consistently researchers have been exploring citizenship via textbook analysis, since at least the turn of the century: Tooth (2008), Hina et al (2011), Silman and Caglar (2010), Kwan-Choi Tse (2011), Faas and Ross (2012), Morris et al (2013), Ersoy, (2013), Kotowski (2013), Moon and Koo (2011), Mori and Davies (2015), Albanesi (2018), Ghebru and Lloyd (2020), Idrissi and Benabderrazik (2020), Pinson (2020), Pinson and Agbaria (2021), and Garica-Alvarez and Arias-Garcia (2022). This sample illustrates the strong reliance on commercially produced textbooks in CEC research, rather than analysing syllabi. This illustrates a gap or an opportunity, for researchers to examine more thoroughly, syllabus documents, partly because this has arguably not been done sufficiently in recent years, but also because not all schools receive textbooks, some cannot afford them, others prioritise other expenditures. Furthermore, countries sometimes have multiple published and sanctioned textbooks in circulation simultaneously.

An associated problem is that a school may have invested in textbooks, that they are then unwilling to discard when a new curriculum is implemented, or textbook revision released. Syllabi, on the other hand, at least in theory, are applied universally, made available publicly, applied to every child, with no variation, or intermediary interpreting agreed upon statements of government intentions and objectives, and reflect, at least when launched the government's positions of the time. Syllabus analysis is an underused approach to understanding contemporary provisions of citizenship education, which holds great potential, particularly as

is the case here, when attempting to understand government intentions, as encapsulated in curriculum documents.

Where curriculum documents are incorporated either in combination or as the sole focus of a research project, document analysis (DA) is frequently deployed as the method of enquiry in (Gunel and Pehlivan 2015, Muff, 2019, Tahirsylaj 2021), and content analysis (Merey, 2012, Ahghar and Eftekhari 2016, Santamaría-Cárdaba and Lourenço 2021), and forms of discourse analysis (Zilliacus et al 2017, Choi and Kim 2020, Gurel and Avci 2022), including Critical Discourse Analysis (CDA) (Gonsalvez, 2013, Gurel, and Avci 2022) are commonly used analytical techniques. CDA, developed by Fairclough, Foucault, Wodak and others, is a common technique applied in documentary analysis of citizenship education, primarily because it considers the social, political, and other contexts of the text production, and reception. In this approach language is considered a “social act” that is contextually and temporally situated and so must be analysed dialectically as such. Whilst this is a terrific method of enquiry, it is ultimately not suitable for studies that employ the rare temporal-cross-national dynamic. The reason being mainly practical. Take for example, a study of three nations at three different points in time. This creates a need to understand, to a native researcher’s level of proficiency, nine sets of PESTLE contexts, as these do not remain static over time, in order to situate each analysis. Subsequently DA and CDA were deemed infeasible approaches for the current study. Content Analysis (CA) and Textual Analysis (TA) however, can be applied in isolation to CEC documents an analysis, without knowledge of context (though this can and was developed, as is shown in the next chapter) and so can be applied reliably to more complicated cases that straddle cross-national and temporal designs.

A key point here is syllabi are rarely analysed directly and if they are, it tends to be as part of a triangulation strategy, or to check other sources are true to the syllabus stated aims (namely textbooks) and not systematically examined for substantive content, which appears as a gap in the empirical literature.

3.3.4 Conclusion

Methodologically, the review revealed a clear imbalance in citizenship education research. Despite the centrality of the intended curriculum to actual outcomes, syllabi are rarely

analysed directly and systematically. Instead, the empirical literature is dominated by qualitative document analysis of commercially produced textbooks, often combined with policy analysis, interviews, and other data sources, making it difficult to attribute findings specifically to the curriculum documents in isolation. Even where curriculum documents are included, methodological blending frequently obscures their distinct analytical contribution. Content analysis, textual analysis, and discourse-based approaches, particularly Critical Discourse Analysis, prevail, yet are often applied to textbooks rather than universally mandated syllabi. This pattern exposes a significant gap and opportunity for syllabus analysis, which offers a more direct, uniform, and policy-proximate lens on government intentions, free from market mediation or uneven implementation. Methodologically, the study therefore justifies its exclusive focus on the intended curriculum and its use of systematic syllabus analysis as an underutilised but powerful approach for understanding citizenship education within postcolonial, cross-national, and temporal curriculum trajectories.

For the remainder of this review then, five inclusion/exclusion criteria were set, which included: adopting a broad definition of citizenship education, encompassing formally delivered school-based programmes across varied subjects and modes, but excluding hidden curricula and extracurricular activity, it included studies published between 1991 and 2024 to reflect the growth and reconfiguration of citizenship education under globalisation, it placed no geographical restrictions to strengthen comparability beyond postcolonial contexts, it focused on primary and secondary curricula relevant to 11–16-year-olds, and excluded senior and tertiary education. The final and perhaps most important criteria is that only studies of the intended curriculum were included, which importantly, also included those analysing curriculum documents only as a means of triangulation, or in coherence, efficacy, and implementation-focused research.

Whilst the chapter has thus far been methodologically oriented, the remainder, whilst still addressing methodological concerns, switches its attention and focus to the theoretical findings of studies involved in CEC analysis. In particular, those regarding the three dimensions of citizenship (*rights, responsibilities, participation, and identity and belonging*)

3.4 National Case Studies

The national case studies of CEC reviewed provide detailed insight into national priorities and meanings attached to citizenship, but rarely examine all citizenship dimensions simultaneously, often privileging one or two dimensions of citizenship, as Lowri-Roberts (2023) did by focussing on identity. This is not a criticism however, as including all three dimensions of citizenship in her analysis was not her aim. Resultantly, however, citizenship is commonly presented in fragmented ways that reflect domestic political and cultural priorities rather than via a holistic understanding of all of its dimensions.

With respect to rights, national case studies show they are often acknowledged symbolically but weakly developed. In Ghana, analyses of Social Studies curricula highlight limited engagement with liberal democratic citizenship, with Osei-Owusu (2020:ii) arguing that citizenship education presents “distorted views of participation, deliberation and belonging” and narrows rights through a strongly nationalistic framing. Osman and Mensah (2020:194) similarly identify an emphasis on national consciousness over rights-based citizenship. In Singapore, studies of national curricula have shown that rights are largely embedded within moral education frameworks, subordinated to social harmony and national priorities rather than articulated as political claims (Alviar-Martin and Baildon, 2016). In Wales, rights have been more explicitly referenced at policy level, particularly children’s rights, but curriculum-focused research suggests an ongoing gap between stated intentions and curriculum realisation (Stewart, 2023).

Across national case studies, responsibilities are the most consistently emphasised citizenship dimension. Ghanaian curricula frame citizenship through duties to nation building, unity, and economic development, positioning responsibility as a central civic virtue (Arnot et al., 2018, Amoako and Otchere, 2024). Singaporean studies likewise identify a strong emphasis on disciplined, responsible behaviour and contribution to collective wellbeing, constructing citizenship as moral obligation rather than political engagement (TG Tin, 2006, Tan et al., 2018). In Wales, research has found that responsibilities are embedded within ethical and community-oriented citizenship aims, where “responsible citizens” make positive contributions to society.” (Smith, 2015).

In relation to participation, national case studies have found that political participation is weakly articulated. Ghanaian curricula gesture towards civic participation but offer limited opportunities for critical or democratic engagement, contributing to a disconnect between curriculum content and young persons lived experiences (Kyei and Liyab, 2022). In Singapore, participation has been framed primarily as social and community involvement rather than formal political action (Alviar-Martin and Baidon, 2016). Some Welsh studies highlight aspirations for learner voice and civic engagement but question whether these aims are translated into concrete curricular provisions (Smith, 2015) reflecting an implementation focus.

Finally, identity and belonging have also been addressed in national case studies, typically in nation-centred terms. Ghanaian curricula promote national unity and shared identity (Osman and Mensah, 2020), while Singaporean citizenship education carefully manages belonging through shared values and multicultural harmony (TG Tin, 2006). In Wales, recent curriculum research identified identity as plural, fluid, and discursively constructed, though still embedded within national narratives (Lowri-Roberts, 2023), where older conceptions had been charged with ethnocultural and even stereotypical presentation.

Overall, national case studies are too varied to generalise, or draw broad conclusions. What the case studies under review showed was a prioritized focus placed on responsibility, cohesion, and national belonging over robust rights-based and participatory citizenship. The next section explores the empirical literature on cross-national comparisons of CEC, where findings were equally enlightening, but where the research design was more usefully aligned with that of the current study.

3.5 Cross-National Studies

3.5.1 Introduction

This section examines cross-national research of CEC, paying particular attention to how regions and countries are selected and compared, before moving onto more specific analysis of the participant countries. It highlights prevailing methodological approaches in the

literature and situates the current study within broader debates about globalisation, nationalism, and curriculum convergence.

3.5.2 Regions and Countries in Cross-National Research

Studies of CEC have increased since the 1990s, particularly in cross-national research. The most influential is arguably the *International Civic and Citizenship Education Study* (ICCS), overseen by the *International Association for the Evaluation of Educational Achievement* (IEA). Whilst generating a vast number of papers (Schulz et al., 2011, Bascope et al., 2013, Schulz et al 2018, Joris and Agirdag, 2019, Damiani and Frailon, 2025), the project suffers from the same issue developed above, that many studies do not provide clear in-depth analysis of curriculum documents.

Whilst curriculum aims are often referenced, no clear analysis of the intended curricula can be discerned. Increasingly, the ICCS is being joined by a growing number of other studies that employ cross-national designs to understand similarities and differences in national programmes of citizenship education (Santamaría-Cárdaba and Lourenço, 2021, Hameed et al 2023). This section reviews such studies to show how they tend to be continentally restricted, and contain no more than ten countries. The review begins broad, and then addresses each of the study countries and the continents in which they are located, separately.

A key observation of cross-national comparisons, regardless of numbers of participant countries included, is that they tend to be almost entirely regional. That is to say it is rare for countries from different continents to be compared. Table 3.1 presents a list of studies that illustrates this point.

Table 3.1 Country Comparisons in the Empirical Literature

Authors	Year	Countries Included
<i>Europe</i>		
Osler and Starkey	2001	England and France
Faas	2011	Germany, Greece, and England
O'Connor and Faas	2012	England, France, and Ireland
Johnson and Morris	2012	England and France

Garratt and Piper	2008	England and Wales
Zilliacus et al	2017	Finland and Sweden
Santamaría-Cárdaba and Lourenço	2021	Portugal and Spain
Piskur et al	2022	Netherlands, Finland, Iceland, Norway, and Sweden
Sautereau and Faas	2023	France and Ireland
<i>Asia and Australasia</i>		
TG Tin	2006	Hong Kong and Singapore
Alviar-Martin and Baidon	2016	Hong Kong and Singapore
Ying Neoh	2020	Singapore and Australia
Zguir et al	2022	New Zealand and Singapore
Qian and Leong	2024	Hong Kong and Macau
Hameed et al	2023	Australia and Singapore
<i>Africa</i>		
Quaynor	2015	Ghana and Liberia

This is not always the case as some studies draw comparisons between countries from different continents, such as Kotowski’s (2013) study of US and German textbooks, and Erdal and Kennelly’s (2024:407) study of the good citizen in “national, provincial, and state civics curricula in five Anglo-American liberal democracies: Canada, the USA, Australia, England, and New Zealand.” These types of studies are much rarer than strictly intracontinental comparisons, which dominate the literature.

Of these regional comparisons, the UK stands out for having been investigated regularly. The United Kingdom is distinctive in its history, politics, geography, languages, culture, and demographics, shaped by the union of four nations, England, Northern Ireland, Scotland, and Wales. This has led to differing national provisions, that researchers have sought to understand comparatively, leading to UK-based comparisons such as, Andrews and Mycock’s (2007) *Citizenship education in the UK: devolution, diversity and divergence*, Kisby and Sloam’s (2012) *Citizenship, Democracy and Education in the UK: Towards a Common Framework for Citizenship Lessons in the Four Home Nations*, Beauvallet’s (2016) *Four Nations Going Their Own Ways? Citizenship Education in the United Kingdom*, and most recently, Jerome et al’s (2022) *Citizenship education in the United Kingdom: Comparing England, Northern Ireland, Scotland, and Wales*

Other useful studies, though not strictly cross-national, have emerged in recent years, where comparisons are subnational rather than national. A good example is Silman and Caglar's (2010) analysis of North Cyprus (Turkish system) and South Cyprus (Greek system) citizenship textbooks, which were found to reflect the respective countries national political positions, and further found that:

Although Turkey is a candidate state for the European Union, the Turkish book focuses on empowering local citizen identity in the nation state and does not discuss broader issues related to global citizenship. By contrast, the Greek textbook covers both national and global issues concerning citizenship (2010:671)

On the whole however, comparisons in the literature tend to be intracontinental rather than intercontinental or global. This is an important conclusion given the current study's concern with globalisation and its convergent potential on national curricula. This is because an assessment of globalisation would by nature require a dataset that is global - not just regional (intracontinental). With a global-in-scope study, important differences among continents could be illuminated. Equally, a study that only compares countries from one region, may attribute a universal status to a finding, where it actually only applies to that continent.

Additionally, studies are generally restricted to comparisons of no more than five to ten countries. Several studies include numbers of participant countries at the middle to higher end of this range, including, Morris et al's (2013) study of six societies, and Piskur et al (2022) who compared five countries. A few studies compare higher numbers of countries, such as Ouakrim-Soivio and Lofstrom's (2022) conceptual analysis of curricula from Nordic countries, including Estonia, and Han et al's (2013:1) examination of "structural features and curriculum content of citizenship education from 16 Western and East Asian countries". However, far more frequently, two or three countries are compared, as in Hameed et al's (2023) study of GCED in Singapore, and Australia, and Sautereau and Faas's (2023) analysis of France and Ireland. The low numbers of participant countries arguably reflecting the difficulty involved in qualitatively analysing large numbers of curricula, the purpose of the current study.

The following three sections address cross-national research but also include, where appropriate, reference to single-country case studies. As mentioned above, the following

sections examine empirical research from Ghana and Africa, Singapore, and Asia, as well as Wales and Europe.

3.5.3 Comparative Research in *Ghana* and Africa

Studies of Ghanaian CEC were found to highlight a strong emphasis on national identity, unity, and development, whilst inadequately addressing participation and belonging. For example, Osman and Mensah's (2020:198) analysis of Ghanaian Social Studies curricula uncovered efforts to develop "... a sense of national unity and national consciousness", reflecting a nation-building orientation also noted in broader scholarship (Darby, 2013). Arnot et al (2018) similarly emphasise how Ghanaian CEC reflects postcolonial concerns with national development. Osei-Owusu (2020) however argues that liberal Democratic Citizenship Education (DCE) in Ghanaian basic education is inadequate, giving "distorted views of participation, deliberation and belonging" and offering a limited conceptualisation of DCE due to "its nationalistic approach that narrows education to national development and neglects humanistic overtones." (2020:ii).

The relationship between politics and curriculum design was the focus of Amoako and Otchere's (2024) paper, who concluded via a discussion of the "selection and presentation of subject matter/content" (2024:91), that the "politicization of Ghana's curriculum can be traced to the precolonial era, and this phenomenon has never ceased to suffice"(2024:88), a sentiment echoed by Asiedu and Fienberg (2024:3) who's analysis of Ghanaian social studies, argued "postcolonial countries struggle with developing curriculum that is independent of colonial powers and germane to national needs.". Further Ghana-based investigations include Boadu's (2025) CDA of pre-tertiary curriculum, which revealed a "social justice orientation" to shaping citizens, and Kyei and Liyab's (2022:150) analysis of Social Studies curricula, which warns that national cohesion goals are undermined by a disconnect between curriculum content and Ghanaian pupils' life experiences.

These findings are also reflected in those from the wider continent of Africa. In Ethiopia for example, research reveals a similarly strong focus on nationalism and responsibility. Ghebru and Loyd (2020:1) analysis of Civics and Ethical Education textbooks found emphases on "sovereignty, patriotism, and responsibility" with decision-making and self-reliance, also

foregrounded. They argued that “responsibility for Ethiopia’s economic development is largely placed on citizens” (2020:5), linking patriotic identity to economic duties. Moroccan CEC studies reveal a different but related pattern, a discourse of rights combined with strong emphasis on responsibilities, yet little attention to multicultural contexts. Idrissi and Benabderrazik, (2020) found that Moroccan textbooks focussed:

...primarily on transmitting procedural knowledge and values about human or child rights, rather than socialising students to a set of skills and competencies that reinforce their critical understandings of citizenship issues and active participation in the future. (2020:43)

while paying “limited attention” to “diversity and pluralism.” They observe that:

Although the important points related to global citizenship education have been mentioned among the curriculum subject priority objectives, addressing aspects of global competency in the 21st century and the role of global citizen as a citizen who is seeking contribution and international mindedness appear ignored and neglected. (2020:43)

Idrissi and Benabderrazik, highlight the work of Jackson, 2014; Montgomery, 2005; Nasser and Nasser, 2008, in arguing that “social studies textbooks do not sufficiently deal with multiculturalism, pluralism or minority rights” (2020:43). Studies of Kenyan CEC likewise demonstrate how political history shapes citizenship curricula. Wainaina et al., (2011:179) describe how, post-independence, the government sought to rethink colonial concepts of citizenship “in line with its political–cultural traditions,” promoting new forms of belonging, civic virtue and duties connected to “nation-building and economic development.” Complementing this, Mukhungo’s (2010:ii) study of Kenyan social studies found textbooks covered “democracy and human rights” the most, but need more to be included on diversity and conflict resolution.

3.5.4 Comparative Research in *Singapore* and Asia

In Singapore, comparative analyses have documented a depoliticisation of CEC, along with tensions between traditional national narratives and emerging multicultural or global concerns. For example, Alviar-Martin and Baidon's (2016:2) comparative case study of global civic education in Hong Kong and Singapore found that the versions of citizenship in both contexts had reverted to depoliticized forms of citizenship that were consistent with a broader approach to citizenship that is.

... more nationalistic than global in nature; moral rather than political; and focused mainly on utilitarian goals to produce adaptable workers able to support national economic projects in the global economy. (2016:17)

The same year, though examining policy rather than curriculum, Baidon collaborated with Sim and Paculdar, to compare the Philippines and Singapore. They concluded:

States utilise educational systems as instruments of nation-building (Green 1997) and the demands of national development in challenging global contexts have shaped citizenship education in postcolonial societies like Singapore and the Philippines. (2016:110)

More recently, Neoh (2020) via a comparisons of Singaporean and Australian CEC, in the context of globalisation, found they differ in focus, but ultimately warned, that “without a firm commitment to democracy, citizenship education can inadvertently become a tool to support the goals of neoliberalism, which are fundamentally at odds with the classical tradition of democracy” (2020:59)

In Asia, several comparative analyses have documented similar tensions between traditional national narratives and emerging multicultural or global concerns. Choi and Kim's (2020:464) analysis of South Korean social studies textbooks identified a “prevalence of a neoliberal agenda and nationalist rhetoric in the global citizenship discourses in the textbooks” that marginalises multiculturalism and social justice.

In China, Kwan-Choi Tse's (2011:161) comparison of textbooks showed that 2005 editions “adopt[ed] a stance of greater reconciliation with human rights, and global citizenship” than its predecessor, yet still expected students to “shoulder the mission of national revival and

socialist modernisation” (2011:161). Reinforcing this picture Wang and Print (2024:398) found in qualitative analysis of Chinese secondary schools “a deliberate effort to connect global citizenship with the necessity of adapting to international competition and China’s role in world leadership” though they did not include any curriculum documents in their analysis. Wang and Print’s work was followed up a year later by Wang (2025:658) themselves, with an analysis of Chinese GCE, which showed the role of the global in a school system dominated by nationalism, found essentially that two discourses prevailed, though inconsistently, one is rooted in Confucianism’s oneness principle, and the other designed to develop global competencies, thought to be needed in the ever-imposing global economy.

TG Tin’s (2006:45) findings are also relevant to the current study, showing national identity is strong in Singapore and Hong Kong, two Asian countries that share a focus on “globalised national identity”, illustrating both a recognition of globalisation and of the resilience of the nation. This is consistent with findings of many studies of Asian CEC (Sim and Print 2005, Sun, 2011), with Ho (2017) showing this to be the case as recently as nine years ago.

Studies covering Taiwan, Thailand, Japan, and Hong Kong however illustrate the region’s diversity. Morris et al (2013:115) observed that in “Hong Kong, Taiwan, and Thailand, moral education and the common good were dominant, and that in the “centralized Asian educational systems, the stated aims were more explicit and focused on the moral behaviour of individuals, communal interests, national identity, social cohesion....” Later Mori and Davies (2015:153) analysed seven Japanese textbooks, observing that active participatory approaches to living in contemporary society were encouraged but that political participation was only limitedly addressed.

Beyond East Asia, research in Southeast and South Asia also reflects complex relationships among national, moral, and global orientations in CEC. Tan et al’s (2018) study of Malaysia’s moral education textbooks found responsibility to be the dominant value associated with good citizenship. They argued that the responsible citizen in the curriculum “embraces not only the meanings of self-obligation and accountability” but also “self-discipline in their behaviour that enables them to avoid conflict and strive for harmonious social order” (2018:119). Yee (2018:193) also found in Malaysian civic textbooks, that despite a growing presence of multicultural concepts, the curriculum did not include an “element of empowering student’s participatory skills in a pluralistic society.”, and Law’s (2004:253)

comparative study of Hong Kong and Taiwan found that despite curricula increasingly emphasising “generic and transnational skills,” they still paid “more attention to local and national than to global concerns.”. Finally, Moon and Koo (2011:574) found via an examination of South Korean textbooks, “national citizenship themes remain core elements but that their emphases have weakened, while global citizenship themes have dramatically increased”.

Fostering social harmony appears to be a core focus for many countries in the southeast and south of Asia. In Pakistan, Hina et al’s (2011:42) content analysis of secondary social studies textbooks, using a four-point framework covering rights and responsibilities, civic sense/public life/law, and cultural and social values, revealed that societal values such as trust, cooperation, and respect for human rights were considered important elements of good citizenship. However, Perveen and Awan (2017) uncovered a “poor situation” regarding “the inclusion of political literacy as a dimension of citizenship education in the curriculum” (2017:187).

Taken together, these studies show that curricula across Asia vary significantly in how they balance national, multicultural, and global factors. Many continue to emphasise national or ethnonational identity and belonging, communitarian responsibilities, social harmony, and state-framed forms of citizenship, even as others illustrate more pluralistic, rights-based, or postnational directions. Overall, the literature depicts Asian CEC as seeking to integrate increasing multicultural or global elements while maintaining strong commitments to national cohesion.

3.5.5 Comparative Research in *Wales* and Europe

Research of Welsh CEC has also been varied, but is less abundant compared to Singapore. though similar to Ghana. Research on countries from the wider continent, however, is quite voluminous, and features two broad themes: UK Based comparisons, and European comparisons – related to EU Membership and its impact on member states.

Many studies of Welsh CEC involved UK-wide cross-national comparisons, as shown in Andrews and Mycock (2007), Kisby, and Sloam (2012), Beauvallet (2016), and Svennevig et

al., (2022), who show research has focussed, arguably insufficiently, only comparisons of education systems and modes of delivery within the UK only.

Garratt and Piper (2008) compared English and Welsh citizenship models, which have since been reformed, arguing that school councils and forums in the English system offered a questionable and narrowly conceived means of fulfilling curricular requirements, where the Welsh system appeared “...more open, democratic and rooted in community involvement” (2008:481). Four year later, Garratt and Piper (2012:1) followed up with a paper arguing “...the development of philosophy and critical thinking skills may usefully improve social and political awareness in young people.”

Since Wales assumed control of their national curriculum development, efforts have been made to develop policy that addresses the country’s unique culture, language, and identity. Much of which has been critiqued for a restricted understanding of ‘Welshness’ anchored in stereotypical notions and unhelpful symbols (sheep, dragons, rugby), as these tell us little about actually being Welsh. Smith’s (2015:2) study of Wales’s Curriculum Cymreig exemplifies this, highlighting intended aims for pupils “to appreciate the distinctive quality of living and learning in Wales” and to “develop their own sense of Welshness,” concluding that a more critical curriculum was required. More recently, Lowri-Roberts (2023) explored discursive constructions of nation, identity and belonging, in the new *Curriculum for Wales* (2022), and through Foucauldian discourse analysis, located identity as “diverse, fluid, spatial and strategic” (2023:38).

Many studies of Welsh CEC, particularly in the contemporary research, have focussed on implementation. Stewart’s (2023:172) study for example, examined teachers rather than pupils during ongoing reforms, and via supplementary document analysis identified an implementation gap, regarding children’s rights, with Stewart suggesting there is some way to go in terms of integrating this critical aspect of citizenship into the curriculum.

Across broader European contexts, tensions frequently emerged between national and supranational identities. Osler and Starkey (2001:302) found that while both French and English curricula addressed human rights, France explicitly foregrounded “freedom, equality, solidarity and human rights,” whereas England relied on “implicit references.” They also observed that England displaced explicit references to the UDHR, UNCRC, and the European

Convention of Human Rights (ECHR, 1950), with the sentence “...the legal and human rights and responsibilities underpinning society” (QCA/DfEE, 2001:294), concluding that France’s approach aligned with universalist, republican traditions. Osler and Starkey have collaborated several times since, including 2001, 2002, 2003, 2005, and more recently 2018, generally examining English curricula, argue that “education for human rights and cosmopolitan citizenship is more urgent than ever” (Osler and Starkey, 2018:31)

Faas (2011:471) similarly found English civic education underemphasised Europe, instead stressing community, and Britishness as multiculturalism, while Greek citizenship “veer[ed] between ethnocentrism and Europeanism.” In Spain, Collado and Azurra (2006:205) argued that “European ideals of citizenship education are dealt with unevenly, and in some cases barely,” and Garcia-Alvarez and Arias-Garcia (2022:1) found EU content “usually scarce and... never considered as important as content explaining the Spanish political system.” Albanesi (2018:21) reported that Italian textbooks weakly incorporated European citizenship recommendations. Keating (2009:159) found Ireland conceived European citizenship “narrowly,” a trend echoed by Sauterreau and Faas (2023:555), who found “French curricula privilege national topics, especially in history and civic education, whereas Irish curricula veer between national, European and international (global) notions”.

The nature and impact of European citizenship, via membership of the European Union (EU), is fertile ground for research into postnational citizenship and globalisation, particularly, for research involving the UK and its four constituent nations (England, NI, Scotland, and Wales) over the period since 1991, as this timeframe also captures the country’s exit from the union. EU or no EU, many studies of European (geographically) countries, observe a trend toward postnational citizenship. Szakacz (2013) for example noted, that Romanian curricula expressed.

... a complex picture of change combining liberal, communitarian and cosmopolitan renditions of the new citizen, all having a common thread: the shift towards a postnational ethos delinking the citizen from the exclusive purchase of national belonging and decoupling citizen action from the absolute duty to the patria. (2013:6)

Additionally, Sen (2019) identified neoliberal, statist, and ethno-religious values in Turkish curricula as “conflicting discourses”. Sen (2022) later described Turkish citizenship education as containing “three evil discourses”: statism, ethno-religion, and neoliberalism.

Regarding social and political participation, evidence was found illustrating concern with reduced curriculum attention, and insufficient programs. In Germany, Wahnig (2016:244) found social learning programmes aimed to “attain pro-social change” and emphasised citizens’ “personal responsibilities” over “critical analysis and truly political participation.” Turkish studies provide similar complexity. Ersoy (2013:137), for example, found textbooks offered “limited content and activities for students to improve their competences for political literacy, participation, critical thinking, respect for diversity and conflict resolution.” Mickovska-Raleva (2019:108) reported that Macedonian civic education lacked content “likely to lead towards an effective development of democratic and participative practices.” More recently, Piskur et al., (2022:352) found that curricula across the Netherlands, Finland, Iceland, Norway, and Sweden did not “provide sufficient frameworks for promoting children’s ...participation.”

A broader emphasis on ‘personal responsibility’ appears across several studies. Engel (2014:246) found Spanish curricula emphasised “Interpersonal relations and participation,” with a focus on “personal autonomy,” and identified neoliberal influences shaping “responsible consumers” prepared for a “global world.” This aligns with Wahnig’s (2016:244) argument that in some nations “personal responsibility” has overtaken “critical analysis and truly political participation.”

Concerns also arise about the balance between social and political participation. Biesta’s (2008:38) analysis of Scottish curricula, warned that emphasis on “[social] activity and community” risked marginalising political dimensions of citizenship. Tahirsylaj (2021:115), drawing on Westheimer and Kahne (2004), found Kosovan curricula promoted a social rather than political conception of participation. Borhaug (2014:431) found Norwegian curricula encouraged critical perspectives but “systematically directed” them away from challenging “core political and legal institutions.”

The challenge of multiculturalism to national citizenship was acknowledged by Patterson and Choi (2018:477) found Scottish curricula “acknowledge the presence of migrants without

disturbing a stable vision... of Scottish national identities,” linking this to patterns in South Korea.

Global citizenship also features widely. Engel (2014:247) argued Spanish global citizenship education provided “an opportunity to challenge an unequal world.” Silman and Caglar (2010:671) found Greek textbooks addressed national *and* global citizenship issues. Faas and Ross (2012:575) found Irish primary curricula emphasised “diversity and active citizenship in a plural society” more than in secondary curricula but noted “discrepancies between the progressive rhetoric of policy documents and the content of textbooks.”

3.5.6 Conclusion

Across regions, the empirical literature reveals clear and recurring patterns in comparative research on CEC. Most notably, studies tend to be intracontinental and limited to small numbers of countries, often privileging historically, culturally, or politically proximate cases. While this has produced rich, context-sensitive insights, particularly in Europe, Asia, and within the UK, it also constrains the conclusions that can be drawn about global trends. The dominance of regional comparisons risks overstating the universality of findings that may in fact be continent-specific, while the frequent absence of sustained curriculum document analysis further limits understanding of intended curricular aims. Despite some exceptions, genuinely global comparative analyses of intended curricula remain rare.

Substantively, the reviewed studies point to a widespread emphasis on national cohesion, responsible citizenship, and economic utility in citizenship education, frequently at the expense of political participation, critical engagement, and pluralistic or multicultural dimensions. These tendencies cut across Ghana, Singapore, Wales, and their respective continental contexts, albeit expressed through different historical, political, and cultural lenses. While global and rights-based discourses are increasingly visible, they are often subordinated to nationalist or state-framed agendas. Taken together, this body of work underscores the need for a broader, globally scoped comparative study that systematically analyses curriculum documents across continents, in order to better assess the convergent and divergent effects of globalisation on citizenship education and to avoid conflating regional patterns with global norms.

So far, insights have been garnered from case studies and cross-national studies, with the latter proving particularly useful in illuminating similarities and differences in CEC approaches. The next section addresses temporal studies of CEC found in the empirical literature.

3.6 Temporal Studies of CEC

Temporal studies are among the most common empirical approaches used to understand CEC, offering valuable insight into how such curricula evolve within a single country over time. While cross-national research highlights similarities and differences between nations, temporal analyses reveals patterns of change and continuity, helping scholars understand how domestic transitions and international pressures shape national conceptions of citizenship, and approaches to citizenship education. Because the current study examines convergence, a process that is simultaneously both temporal *and* cross-national, studies that analysed successive curricula from the same country, were also found to be useful, particularly for showing how CEC change over time. Although they are used in varied ways, the examples that follow illustrate the main trends in how CEC have been analysed temporally in the existing literature.

Temporal studies of CEC show several interconnected global trends, beginning with a shifting balance between rights and responsibilities. Moon (2013:424) for example, found that South Korean curricula increasingly addressed “rights of diverse groups and the need to empower them to tackle inequality,” a development consistent with the modern liberal democratic tradition. Yet this trend is contrasted with findings across much of Asia, where communal responsibilities are prioritised over a liberal, individual rights-focused conceptions of citizenship, such as in Li’s (2025) study of Chinese curricula. This contrast illustrates a broader rights-responsibilities divide shaping citizenship education across different political cultures.

A major pattern in temporal studies concerns the steady deemphasis of political participation alongside the rise of community-focused citizenship. Several temporal analyses show a diminishing interest in explicitly political or democratic participation, is being replaced by an emphasis on community engagement, social participation, and pluralistic coexistence. Tooth’s

(2008:vi) analysis of Manitoban textbooks from 1911 to 2007 identified three eras of citizenship themes in textbooks; the assimilative era rooted in British values, the community life and service era emphasising community participation, and finally the multiculturalism era that sought to acknowledge ethnic and cultural diversity. Despite these shifts, Tooth found, a “Generally passive political participation with limited civic involvement in support of specific causes” (2008:167).

Similarly, Butler and Milley’s (2020:25) analysis of consecutive Ontario curriculum documents (1999-2018) found a systematic removal of the 1999 curriculum focus on citizen action, both local and national, which they argue reflects an “ideological liberal concern over the complexity of ethical action within a pluralistic public sphere.” These trends are reinforced by Choo et al’s (2025) mixed method study, which included analysis of three versions of Singapore’s CCE curriculum (2007, 2014, 2021), where they identified a discernible shift from moral adaptation to “more active, critical engagement” (2025:1582) was identified from 2010 on. Such findings align with literature showing that, while multiculturalism and acceptance of pluralism are increasing, Asian states often maintain priorities involving the cultivation of a depoliticised citizenry. This study carries additional relevance to the current study as they both directly analyse three of the same Singaporean syllabi.

Another major theme across temporal studies involves the relationship between political change and curriculum reform. For example, Sánchez-Agustí and Miguel-Revilla’s (2020:166) analysis of Spanish reforms between 2006 and 2013 argues that “contrasting ideological and political values” were the main drivers behind the transition from a discrete subject, “Citizenship Education and Human Rights,” to a cross-curricular approach, due to political and social protest. In Kosovo, Tahirsylaj (2021:115) found that the 2011 curriculum served political goals aligned with the European Commission’s key competence framework, effectively branding Kosovars as “Young Europeans,” while promoting “personally responsible/individualist” and “participatory/social” citizenship conceptions. Studies of Israel show similarly political dynamics, with Pinson and Agbaria (2021:733) finding that 2016 textbooks “often prioritises the ethno-national model of the nation state over and above the commitment to democratic values, including minority rights.” The effects of political upheaval are also evident in Turkey, where Sen (2019) found that after the 1997 coup, new textbooks replaced the more human-rights-oriented Citizenship and Human Rights Education

curriculum. According to Sen, this shift was marked by the “negative depiction of the Kurdish people and political Islamists and the hagiographic portrayal of Atatürk and the army” (2019:1). Szakacz’s study, mentioned above, was also temporal in nature, and as already mentioned, identified a transition towards postnational citizenship (2013:6). Together, these examples show how political interests, regime changes, and ideological imperatives shape curriculum content and sometimes lead to forms of depoliticisation or even indoctrination, as noted in studies such as Kwan-Choi Tse (2011).

Long-term historical studies also demonstrate transitions from passive to active citizen conceptions. Asare-Danso (2018:34), analysing Ghanaian education across pre-colonial (1820-1850), colonial (1851-1956), and postcolonial (1957-2017) contexts, identified the Indoctrinative, Romanticist, and Cognitive-Structural approaches respectively, illustrating a general progression “from fostering passive to fostering active citizens.”

Globalisation also features heavily in the literature, especially in studies examining developments since the 1990s, described by Tuncer (2023:87) as a period of “accelerated globalisation.” Many temporal studies document transitions from monocultural to multicultural frameworks, and from nation-centric citizenship towards multilevel or global citizenship models. Yet these shifts often coexist with strong national priorities. Li and Ma’s (2025:15) analysis of Chinese citizenship education through four phases moving from a traditional nation-state model towards multilevel citizenship, found:

It increasingly focuses on global dimensions to facilitate individual comprehensive understanding of multiple identities and abilities to cope with complex, pluralistic, and changing societies. (2025:15)

However, other studies show that such transitions often reflect state-managed rearticulations of national identity rather than its weakening. For example, Kwan-Choi Tse (2011) study found that while a transition toward human rights awareness and global citizenship was discerned, national priorities remained, where citizens were expected to “shoulder the burden” of the “national revival” as well as “socialist modernisation” (2011:161)

Similarly, Moon and Koo (2011:574) found that in South Korea, national citizenship themes “remain core elements but... their emphases have weakened,” while global citizenship

references “dramatically increased” during the 1990s and 2000s. Their mixed-methods design, combining quantitative trend measures with qualitative thematic analysis, is highlighted as a model for future multi-country temporal comparisons. Moon and Koo’s (2011) study gives an indication of how Singapore’s curriculum reflects an emerging global perspective as it intersects with a longstanding national focus, catalysed in 1997 by the launch of National Education (NE) a policy designed to imbue a national perspective to education. Moon’s (2013:424) later study of sixty South Korean civics textbooks uncovered an increasing presence of Western liberal notions of diversity and multiculturalism over time, illustrating how earlier depictions of ethnic homogeneity gave way in the 1990s to a focus on the rights of diverse groups, supporting the idea of citizenship as an expansion of rights claims.

Further temporal comparisons similarly highlight a preoccupation in curricula with national and local priorities. Law’s one hundred-year study (2013) of Chinese curricula showed long-term tensions between accommodating global influences and preserving national identity. He found that early 20th-century struggles between domestic and foreign orientations were replaced by strong state-led efforts to define and foster national identity, culminating in a curriculum aimed at supporting “national rejuvenation” while promoting multilevel citizenship (2013:596). In Malaysia, Hoon’s (2013:58) analysis of Moral Education syllabi found the number of values addressed dropped from eighty in 1983 to thirty-six in 2000 and to fourteen in 2010. These changes closely aligned to national policies and agendas but also “global trends in education” (2013:54). Hoon describes:

An urgent need for MOE to review the existing core values, and identify the values that are consensually acceptable by the different religious, ethnic, and cultural groups that constitute Malaysian society, and at the same time educate Malaysians to be global citizens (2013:58)

This seemingly reflects the challenges faced in many pluralistic societies.

Overall, temporal studies consistently show that while diversity, pluralism, and globalisation increasingly influence citizenship education, national narratives, state priorities, and political interests continue to shape the aims, content, and direction of curricula. This results in recurring tensions, between rights and responsibilities, political participation and community

engagement, and identity and belonging, in nation-centric and global perspectives. These studies collectively highlight the complex interplay between societal change and state authority in shaping evolving understandings of citizenship. As seen, citizenship education research is replete with examples of both cross-national and temporal research, though combining the two, as is addressed in the next section, is extremely rare.

3.7 Comparing Cross-Nationally and Temporally

Analysis of CEC cross-nationally and temporally in one study is rare, so rare in fact that only three were found to employ such a design during this review. Their rarity may be due to the difficulty involved in conducting such spatial-temporal analyses. Regardless, by design, the three examples below carry a lot of significance for the current study.

TG Tin (2006) conducted a temporal and cross-national comparison of Hong Kong and Singapore's citizenship education, but combined multiple sources and findings, so that findings extracted from the actual syllabi were hard to distinguish. TG Tin's references also list multiple syllabi from both countries spanning 1985-2005, but only two versions of Hong Kong's "Guidelines for Civic Education in Schools" from 1985 and 1996 were consecutive. All other syllabi cited were singular, meaning no prior or subsequent versions were included in the analysis. Nevertheless, this is an especially useful study, not only because it examines Singaporean CEC during an overlapping period with the current study, but also because it examines both temporally and cross-nationally, an argument the researcher makes for anyone wishing to uncover evidence of convergence.

Another study to attempt this rare approach was Nakagawa and Wotipka (2016:519) who analysed five hundred textbooks published between 1970 and 2008 in seventy-four countries, finding that mentions of rights and women's rights specifically, had increased over four decades in social science textbooks globally. This they explain is in part a result of "linkages to global norms of human and women's rights" (2016:501).

And finally, in another rare research design, Garcia-Alvarez and Arias-Garcia (2022:7) compared Spanish national curricula with regional curricula, at five points between 1990 and 2020. However, despite technically involving temporal and spatial comparisons, there is no

comparison between nations. Furthermore, the large number of variables involved in the study (years, subjects, search terms, and educational laws) meant that analysis, appropriate for their objective to “study the way EDE has been integrated into the Spanish education system.” is perhaps not as appropriate for examining curricula for conceptions of citizenship. Collectively, these three studies represent the entirety of relevant studies found to combine cross-national (or regional) and temporal analyses of CEC.

A final point on the cross-national/temporal research design, revisits the methodological concerns highlighted earlier, that some studies in which it *is* adopted, most notably the *ICCS*, the focus is on the subjective interpretations of stakeholders (teachers, pupils, and less so parents), and not the intended curriculum.

3.8 Chapter Conclusions

There are five key conclusions to draw from this empirical literature review, that when considered together, indicate a need for further research to investigate curriculum change over time, comparatively, across national contexts, and by means of analyses of the actual syllabi. Such approaches would allow for an illumination and comparison of different nations’ curriculum journeys, something that, in this review at least, was not found to have existed outside of a handful of studies.

Firstly, an opportunity within the empirical research exists to examine more broadly the citizenship content of national programmes of citizenship education, as currently there seems to be a tendency to focus on one, or even two of the dimensions identified in the previous chapter, (*rights and responsibilities*, *participation*, or *identity and belonging*) but rarely all three. This means that discussions of citizenship are commonly restricted to an incomplete picture. For example, an analysis of ‘identity’ is unlikely to also provide a clear picture of the related rights and responsibilities, and vice versa. Citizenship is, as we have seen, a complex and contested notion that is constituted by *rights and responsibilities*, *participation*, and *identity and belonging* so although it is important to focus on these dimensions individually it is also important to have a more comprehensive overview, especially if the overall research objective is to establish whether conceptions of citizenship are converging.

Secondly, analyses of syllabi are rare, especially in comparison to textbook analysis, and are often only conducted as a means of triangulating from other methods, or as part of curriculum coherence approaches, whilst textbooks analysis was much more common. Textbooks do provide rich data for analysis but have drawbacks for those seeking to analyse the intended curriculum - namely that they are not necessarily distributed nationally, are often produced privately, and sometimes by different companies. Textbooks serve different stakeholders, primarily the private entities that produce them, and do not necessarily reflect solely the government's official perspective and priorities. Textbooks are not always distributed to every child in a country in the same way a syllabus is applied to every child. Additionally, syllabi are often only analysed as a means of triangulating findings from other methods, particularly interviews with educators and pupils, which whilst important, means that syllabi are often only ever examined as far as the stated aims, which are then used to confirm teachers and pupils' subjectivities.

Thirdly, there is a dominating concern with postnational citizenship and globalisation and the extent to which countries are seeking to shape global citizens. This focus possibly downplays the extent to which countries, at times, might still want to undertake important nation building activities. For some postcolonial states, including those in this study, nation building may continue to be a high priority. Therefore, a study of CED not GCED is required, but crucially one that is open to the global elements of the analysis and data, which will inevitably arise.

Fourthly, though these studies are both interesting and illuminating, uncovering change over time via temporal analyses of a single country's curricula at different periods, or similarity and difference among national approaches via cross-national analyses are common, yet studies that make comparisons over time *and* across contexts, appeared extremely rare. However, this is a necessary approach if one is to demonstrate convergence, as this study seeks to do by focusing on the curriculum journey's postcolonial states make. To conduct such a study is important and will aid curriculum makers in better understanding curriculum inclusions, omissions, tensions, and framings, as well provide opportunities for improvements through the borrowing of curriculum ideas.

Finally, no studies were found that sought to uncover signs of convergence specifically, and only a few examined CEC cross-nationally and temporally at the same time, nevertheless

comparing the findings from different studies does suggest some areas of convergence and divergence. Broadly, studies showed that while references to rights, such as human rights, minority rights, and global citizenship, have increased in several regions over time, many countries, particularly in Africa and Asia, maintain a strong emphasis on responsibilities, often linking civic duty to national development, economic contribution, or moral behaviour (e.g., Ghana, Ethiopia, Malaysia). Political participation is frequently underplayed, temporal studies often show a long-term drift away from explicitly political engagement toward forms of social participation, community involvement, and service-based citizenship, with many countries encouraging harmony, cooperation, and social cohesion over democratic action or critique. Finally, Identity and belonging remain primarily nation-centric, although multicultural and global dimensions have expanded, most curricula continue to prioritise national cohesion, patriotic identity, or state-framed narratives, with global or plural identities incorporated selectively and often without impacting nationalistic goals. Together, these patterns illustrate citizenship education that increasingly acknowledges diversity and globalisation but remains anchored in national priorities, responsibility-focused citizenship, and depoliticised forms of participation.

3.8.1 The Research proposal

The research proposal, based on this review, is elaborated in Chapter Four, but essentially involves the analysis of consecutive curriculum documents from multiple countries, in order to demonstrate possible convergence among postcolonial countries CEC interpretations of citizenship and its core dimensions.

Chapter Four: Outlining the Methodological Approach

4.1 Introduction

This chapter sets out key decisions made during the research and the rationale that guided them. Such transparency is important in interpretive research generally but particularly in this case, as the methodology was relatively complex, uniquely incorporating cross-national and temporal comparisons simultaneously, in a research design that involved both quantitative and qualitative analytical techniques, which also included an innovative approach developed purposely for this study.

This chapter outlines and justifies the methodological approach adopted in the study. Section (4.1) introduces the chapter, while (4.2) explains the transformational impact of COVID-19 on the research and the resulting redesign of the project. Section (4.3) revisits the research problem and questions, and (4.4) outlines the study's philosophical stance, including its ontological, epistemological, and reasoning positions. The research design is then presented in (4.5), followed by discussion of the age range and study period selected (4.6) and the rationale for choosing the participant countries (4.7). Section (4.8) justifies document analysis as the method of enquiry, while (4.9) explains how curriculum documents were obtained and selected for analysis. The analytical approaches employed are detailed in (4.10), before (4.11) addresses issues of quality, trustworthiness, reflexivity, positionality, and internal coherence. Finally, (4.12) concludes the chapter, reflecting on the limitations and challenges encountered, the suitability of the approach adopted, and providing sufficient methodological transparency for the study to be replicated, developed, and critically scrutinised.

4.2 Covid-19 Impact on the Research

This research was funded by the ESRC via the Wales DTP and originally centred on the *Curriculum for Wales* (2022), via the 2020 guidance document (WG, 2020). Designed as a curriculum coherence study, its objective was to determine whether teachers and pupils' understandings of citizenship aligned with those prescribed by the Welsh Government via the curriculum guidance document. As the *Curriculum for Wales* (2022) is still in its implementation phase, the study was positioned to contribute original insights. The researcher's experience conducting interviews and focus groups both academically and in a professional capacity provided a confidence this initial approach was viable.

However, by spring 2022, eighteen months into the project, the COVID-19 pandemic introduced unprecedented restrictions, school access ceased, public buildings closed, and increased teacher workloads made participation in external research projects all but impossible. Subsequent attempts to amend the research plan proved insufficient, and a comprehensive reformulation of the research became necessary. Following an emergency supervisory meeting, a new study was devised, necessarily limited to the intended curriculum. The revised overarching research objective became the comparison of intended curricula from Wales (as was always partly the plan), with that of two other meaningfully contrasting postcolonial countries, examining their conceptions of citizenship to determine if they are converging in an era of "accelerated globalisation" (Tuncer, 2023:87).

Throughout the research process, the central goal of investigating conceptions of citizenship in the *Curriculum for Wales* (2022) remained, only now the investigation was both constricted, via its sole focus on the intended curriculum, and expanded, via the inclusion of multiple syllabi from Ghana and Singapore, as well as Wales. Green argues an examination of the spatial and temporal is the only way claims of globalisation's effects can be assessed (2002:8). As globalisation is a spatial and temporal phenomenon, this revised approach, that is both cross-national and historic, was considered appropriate for an investigation into globalisation and its possible convergent effects on curricula.

4.3 Research Problem and Questions Revisited

Despite the revised research plan, the central challenge remained that citizenship is an “contested concept” (Lister, 1997:1, 2012:373, Kerr and Cleaver, 2004:7, Clegg 2020:15), rooted in conflicting philosophical traditions (Fouts and Lee, 2005:20), including liberalism, civic republicanism, and communitarianism, that it is context dependent (Whitty, 1999:1), with multiple, often conflicting interpretations of what it is and should be. Because of this conceptual diversity, CEC can vary significantly between nations. We must not assume therefore, the presence of citizenship in any two countries’ national curricula imply they seek to shape the same type of citizen, nor can we assume that because a country seeks to shape a particular type of citizen now that that was the case in the past, or will continue to be the case into the future. This research subsequently sought to track change and continuity in conceptions of citizenship in the CEC of Ghana, Singapore, and Wales between 1991 and 2024. The study was particularly interested in how these three postcolonial nations CEC have responded to “accelerated globalisation” (Tomlinson, 2007:410, Tuncer, 2023:87), and particularly whether evidence could be found of convergence among their conceptions of citizenship.

This research problem required specific research questions, that in their final form (below) were designed to be cumulative, permitting the overarching question (RQ3) to be answered. The final research questions were:

1. How is citizenship conceived within the national curricula of Ghana, Singapore, and Wales?
2. How have these conceptions changed during an era of accelerated globalisation (1991-2024)
3. Do these changes reflect convergence in the types of citizens these nations have sought to shape?

It must be made clear that these questions were not fixed from the outset but rather evolved throughout process, meaning there were several revisions, which in turn directed and redirected research efforts, refining both the research questions and the analytical approach. It was recognised from the outset having clear and succinct research questions would inform methodology, data collection, and analysis in a coherent way (Palermo et al 2012).

Subsequently, a review of the literature was conducted that permitted the delineation a new research problem, and research questions. To be effective they had to be “unambiguous statement[s] that clearly articulate the phenomenon” under investigation (Kivunja, 2016:167). Creating such unambiguous statements was a challenging task here, as the research objective demanded a research design only seen implemented three other times in the empirical literature, and an analytical technique that was developed specifically for this study. All research, regardless of what the research questions are trying to achieve, has an underpinning philosophical stance. This study’s stance is discussed in the next section.

4.4 Philosophical Stance and Reasoning Style

Whilst developing the research questions, a deeper consideration of the study’s philosophical stance was conducted. A philosophical stance in research refers to the underpinning beliefs of the researcher in relation to the researched. As Boucher (2014:2331) explains, they are “pragmatically justified perspectives, or ways of seeing”. A researcher’s stance can change depending on the study or stay firm throughout their career. Some are strongly associated with epistemological and ontological stances and can be classified easily (Max Weber the interpretivist for example), others such as Michel Foucault, the renowned sociologist, have been more reticent to label themselves anything, align with any school of thought, field of study, or general position. Foucault felt so strongly about this, he invented an original title for himself “at the College de France, as Professor of the History of Systems of Thought” (Ball 2012:10), intended as it was not to not align with any of the established positions.

A philosophical stance essentially concerns the researcher’s ontological and epistemological positions regarding the research. Ontology in short is concerned with what is real, whether reality exists objectively, or is the result of subjective experience (Al-Saadi, 2014)

The two core ontological positions are firstly, realism or relativism, which asserts reality exists independently of the researcher, is objective and measurable, and the second, social constructivism, claims reality is not a single objective truth, but multiple subjective and socially created realities, mediated through cultural and social contexts.

Where ontology refers to what is real, epistemology concerns what can be known about what is real, in other words it involves knowledge, or more specifically, the “nature of knowledge”,

as Al-Saddi (2014:2) explains, “epistemology deals with the ‘nature’ of knowledge, its possibility (what knowledge is possible and can be attempted and what is not), its scope and legitimacy.”. Broadly speaking the two core epistemological positions are, firstly, positivism or objectivism, which, aligns with a realist ontology, asserts that because reality is objective, independent and measurable, knowledge of it can be obtained via empirical testing, and secondly, interpretivism, which aligns with a constructivist ontology holds that, as reality is constructed in the minds of subjective actors, knowledge of it, must be obtained and interpreted through research with those very actors.

As with many aspects of the current study, determining an ontological and epistemological philosophical stance was challenging. As a sole researcher, interpreting the data in general isolation, the research has a constructivist ontology and an interpretivist epistemology, particularly where latent meaning is concerned. However, as the research mainly involves quantitative content analysis, where mentions of terms are counted, there is an assumption that knowledge is objective, independent, and measurable. Ultimately, being inflexible regarding stance, can be limiting. The current study is consequently a mix of constructivist-realist ontology and interpretivist-positivist epistemology.

Another distinction that needs to be made in a research project relates to the style of reasoning applied, and whether the logic of enquiry is deductive or inductive, where the former seeks to confirm theory and the latter, to build it. A third way, which combines elements of both - an inductive-deductive hybrid approach - involves an iterative approach to method building, literature reviewing and research question development. This was an appropriate approach in this instance for several reasons. It allowed for correction and revision, but also permitted a framework of enquiry to be established, developed from an initial review of the literature (that included six dimensions; participation, membership and identity, rights and responsibilities, state neutrality, morality, values and education, and finally law and order), which was then refined after initial data collection, which crucially allowed for the ongoing development of the RQs and the framework itself. This approach not only refined the citizenship dimensions that formed the focus of this investigation but also as Bowen (2009:30) writes they, “...suggest some questions that need to be asked and situations that need to be observed as part of the research.” These can be otherwise unforeseen but incredibly valuable to an investigation, as was the case here, where new categories or

dimensions of citizenship (*rights and responsibilities, participation, and identity and belonging*) emerged from the data.

4.5 Research Design

4.5.1 Introduction

Conscious of the study's ontological and epistemological stance (*constructivist/realist interpretivist/positivist*) and overall research objective (to compare and track change and continuity in curricula conceptions of citizenship, with the aim of uncovering signs of curriculum convergence), a research design was decided upon to provide a structure for the investigation.

There are four principal research designs; longitudinal, cross-sectional, case study and comparative analysis, and the research design should lead on naturally from the research questions. If we wish to establish change and continuity, a *longitudinal* approach is sensible, should we wish to evaluate a theory, then we could employ an *experimental* design, deep contextual understanding, a *case study*, variation a *cross-sectional* design, and comparison a *comparative* design. The current study is essentially a cross-national comparative analysis on account of its comparison of citizenship conceptions across different postcolonial national contexts, though as will be shown, a non-standard example, on account of the incorporation of a temporal dimension to analysis. Firstly however, the following section explores cross-national comparative analysis as a research design.

4.5.2 Cross-National Comparative Analysis

The study's research design was shaped by interpretivist influences, and the objective to examine change and continuity in curricular conceptions of citizenship. A research design was selected to provide a coherent structure for addressing the research questions and generating reliable, interpretable data. While longitudinal, cross-sectional, case study and comparative designs, were options, the focus on identifying convergence and divergence across nations made a cross-national comparative analysis the most appropriate overarching

approach. However, the study's complexity required a hybrid research design. Although fundamentally comparative, it also incorporated a temporal dimension, as curriculum convergence can only be assessed across both space and time. The research effectively compared three retrospective longitudinal analyses, tracking citizenship curricula in each nation over three decades. This allowed the study to identify patterns of continuity and change within each national context, as well as degrees of convergence or divergence among national contexts.

The logic of comparison, particularly the selection of meaningfully contrasting national cases, underpinned the design. The aim was not only to compare curricula across countries but also to understand how citizenship dimensions have been included, omitted, framed, and reframed over time within each context, and how these trajectories relate to one another. Within the fields of citizenship education studies and comparative international education, cross-national studies remain relatively limited, and are often Eurocentric, with African countries historically excluded. This study sought to address that gap by contributing new empirical evidence. A cross-national comparative approach was employed to uncover signs of convergence, draw lessons for policy and practice, especially in Wales, and deepen the field's understanding of citizenship conceptions in postcolonial contexts.

Central to the field of citizenship education research, and comparative international education (CIE), are the *International Association for the Evaluation of Educational Achievement* (IEA) cross-national studies, described in the previous chapter, which include the more recent *International Civic and Citizenship Education* (ICCS) studies, but as Hahn (2015) noted, their studies aside, "only a few researchers conducted studies that spanned multiple countries" (2015:3). Furthermore, African countries were entirely omitted from the IEA studies to begin with, which is heavily Eurocentric in terms of participant countries. This exploratory study aims to add to this corpus of empirical cross-national research into citizenship education.

Recognising that education policy is simultaneously global and local, the comparative approach was particularly suited to analysing these dynamics. The study focused specifically on comparing conceptions of citizenship as articulated in the intended curricula of Ghana, Singapore, and Wales, rather than broader curricular features, making the comparison both targeted, theoretically grounded, and effective.

For a comparative analysis to be effective, we must first be clear on what is being compared. A curriculum has a wide range of features open to investigation. For example, McPhail and Rata (2016) compared curricula for “powerful knowledge” while Sautereau and Faas (2023) examined discourses of national identity. The current study sought to compare conceptions of citizenship within the prescribed curricula of Ghana, Singapore, and Wales.

The purpose of comparative research designs, Hantrais (1999) argued, is to test theories, draw lessons for best practice, or just to gain a better understanding of social processes more generally. As the current study aimed to test the theory of convergence (or at least uncover evidence of convergence), draw lessons for best practice for the Welsh context, and gain a better understanding of how citizenship is conceived in postcolonial nations, a cross-national comparative research design was deemed appropriate. The paradox at the heart of this research is that a cross-national approach, can be considered “...a response to the internationalisation of education policy while simultaneously recognising that education is a highly regional and local activity (Wahlstrom et al 2018:587)

Ultimately, to establish whether the CEC of postcolonial countries of the former British Empire are converging (or indeed diverging, continually different or continually similar) regarding their conceptions of citizenship, it was logical to employ a cross-national comparative research design, in order to “...observe social phenomena across nations, to develop robust explanations of similarities or differences ...” (Hantrais, 1999:97).

4.5.3 Introducing Temporality to the Research Design

A standard cross-national comparison of CEC from singular points in time, can reveal similarities and differences in national conceptions of citizenship among multiple countries, but it cannot tell us anything about how curricula change and evolve. A temporal comparison of citizenship conceptions from within one country, can reveal such change, but only in that one country. Broadly speaking, comparative studies of CEC are either cross-national or temporal, but rarely both, as illustrated in the previous chapter. However, as convergence is a spatial and temporal phenomenon, its illumination requires a combination of both cross-national and temporal analysis. For this reason, the current study included both contemporary and recently historic curriculum documents from Ghana, Singapore, and Wales.

4.6 Age Range and Study Period Selection

4.6.1 Defining an age range for comparison.

Selecting an appropriate age range was another key methodological decision. McNamee and Seymour's (2013:156) analysis of 320 articles of empirical research with children found that the most researched age range was 10 to 12 years. While this age range was included within the present study, the upper limit was extended to 15 years to accommodate variations in the delivery of core CEC across the three national contexts. More specifically, a provisional age range of 11-12 years was expanded to 10-15 years in order to capture the compulsory phase of pre-tertiary education immediately preceding examination-specialisation pathways. The lower limit was dropped from 11 to 10 years, solely because the study included Ghanaian syllabi delivered at the upper primary level (10-11), notably *Citizenship Education* (CRDD, 2007a) and *Our World Our People* (NCCA, 2019), which are designed for pupils aged approximately 10-11 years. The upper limit of 15 years was chosen to ensure inclusion of the relevant Welsh and Singaporean CEC, some of which are delivered to pupils up to age 15. In this way, the study focused on the mandatory years of pre-tertiary education, during which pupils generally follow a common curriculum and have limited opportunity to choose subjects, rather than the later years when curricular differentiation and high-stakes examination pathways become more prominent. This decision therefore enabled a more comparable alignment of study cohorts across Ghana, Singapore, and Wales by including 10-11-year-olds while maintaining a shared focus on compulsory, pre-examination civic and citizenship education provision.

4.6.2 Determining the Study Period

A further key decision involved setting the study period. In determining how far back the study should go, it was decided that an investigation of curriculum convergence would require a span of many decades. However, it became clear national curricula are a relatively recent phenomena in many countries and so the study period was revised downwards.

Wales implemented its first provision of national (Welsh not British) citizenship education as a cross-curricular theme in 1991 entitled *Community Understanding* (CCW, 1991). This was

the logical starting point for data collection as it was in essence the beginning of Wales's national citizenship education curriculum (CEC) journey.

A key criterion to be met when attempting to demonstrate convergence is that it requires at least three data points. It was subsequently decided the analysis should include CEC implemented following the last three major curriculum reforms in each country (Table 4.1). The study period 1991-2024 accommodated the last three reforms in each country.

Table 4.1 The Last three Curriculum Reforms of CEC in each Country.

	2 nd Most Recent Reform	Most Recent Reform	Current Reform
Ghana	2005	2019	2024
Singapore	2004	2012	2024 (Ongoing)
Wales	1991	2008	2022 (Ongoing)

4.7 Selecting Participant Countries

4.7.1 Introduction

As stated, partly due to funding requirements, the research was initially entirely focused on the new Welsh curriculum, subsequently, Wales became a de facto mandatory inclusion. Upon revising the research plan, the challenge became the identification of two postcolonial countries that would meaningfully contrast with Wales, and each other, in order to best draw out the similarities and differences in the type of citizen they have each sought to shape.

4.7.2 Setting initial inclusion criteria.

A few key features of the research mandated certain parameters be imposed. Firstly, the comparator countries had to be Anglocentric, for mainly pragmatic reasons of cost and access, be a former British colony, or have been under British jurisdiction and governance, have a system of national education where curricula are accessible and able to be compared,

and be currently involved (as of 2022) in programmes of curriculum reform. This criterion generated a list of fifteen countries: Australia, Canada, India, Jamaica, Kenya, Malaysia, Northern Ireland, New Zealand, Nigeria, Philippines, Republic of Ireland, Scotland, South Africa, USA, and Israel. Key features of each country's contemporary and historic CEC were compiled (Appendix One) and the countries appraised for inclusion in the study, the main instrument of appraisal being whether the countries contrasted meaningfully in PESTLE terms, which is to say, politically, economically, socially, technologically, legally, and environmentally.

4.7.3 Narrowing down the pool.

A key point to emphasise here is that the approach adopted to study curriculum convergence was exploratory, and fairly unique. That being so, there was little precedent for determining the number of participant countries that should be involved. It was decided however, that a minimum number of participant countries would be required to demonstrate convergence, but too many would render qualitative analysis unmanageable. Three countries were consequently considered not just appropriate but optimal, given the study's unique approach, meaning two further countries were to be selected from the provisional pool of fifteen. There are several types of purposive sampling designs (Palinkas et al., 2015:3), including the selection of "extreme or deviant (outlier) cases", from which we can examine "unusual manifestations of phenomena of interest". There is also the "selection of homogeneous cases for the purpose of reducing variation", however the most appropriate design for the current study, addressed by Palinkas, is:

... the selection of cases with maximum variation for the purpose of documenting unique or diverse variations that have emerged in adapting to different conditions, and to identify important common patterns that cut across variations (2015:3)

In essence this means selecting cases which contrast sufficiently to enable valuable comparison to be made. This fundamental point drove the early search for suitable cases, as well as forming the main qualifying criteria for the two additional nations ultimately included in this cross-national comparison - Ghana and Singapore.

As the research was concerned with postcolonial contexts and their influence on CEC, country PESTLE profiles were chosen as the main theoretical criteria for participant country inclusion. A PESTLE analysis is a means of understanding the particular political, economic, social, technological, legal, and environmental conditions within a country or geographic location, in a brief but wide-ranging manner. A PESTLE analysis was performed for each participating country (Appendices 2-4). It must be added the more impactful criteria for inclusion however was the pragmatic reality of document availability.

4.7.4 Unequal national distribution of empirical studies

A review of the Ghanaian literature revealed empirical investigations into the country's citizenship education curricula (hereafter CEC) were few and often not focussed on the Junior High School (JHS) and Upper Primary (UP) school curricula. Instead, much of the Ghanaian literature consists of historiographies (Akyeampong, 2010, Dwomoh 2018, 2022), investigations of the wider school systems (Akyeampong, 2010) or examinations of the Senior High School curriculum (Bekoe, 2006, Angyagre and Quainoo, 2019). Additionally, African countries have not been included in the field's major studies, as Quaynor (2015) explains:

Despite the crucial role of civic education in new democracies in Africa, the most comprehensive studies of civic education to date, the 1999 International Association for the Evaluation of Educational Achievement Civic Education study (CIVED) and the 2009 International Civic and Citizenship Study (ICCS), included no countries from the continent (Quaynor, 2015:121).

Despite multiple iterations of the ICCS since, African countries continue to not be included. Also, despite Wales being a de facto mandatory inclusion in the study, here too, empirical research of CEC is sparse, where earlier studies, as illustrated in Chapter Three, were mostly dominated by UK based comparisons. Additionally, studies addressing the new Welsh curriculum have, perhaps naturally, so far tended to focus on its implementation (Sinnema et al 2020).

Singapore on the other hand has produced a substantial corpus of empirical research investigating CEC, a large component of which is cross-national in nature, but generally regional in scope. Rarely, has the research compared Singapore to countries in for example Europe, Africa, and the Americas. Regionally however, Singaporean CEC has been compared regularly with Hong Kong (Tan, 1997, Wing-Leong and Sidhu 2003, Lo, 2010), but also China (Huang and Bond, 2016), and Australia (Neoh, 2020, Hameed, 2020) among others.

4.7.5 Mitigating Unfamiliarity with national contexts

Greator et al (2019:13) suggest “...comparing countries requires country experts, whereas detailed comparison of subject content requires subject experts”. As this study attempted both simultaneously, in Greator et al’s (2019) view, it required national experts on Ghana, Singapore and Wales, and subject experts of the respective curricula analysed. As the researcher is Welsh and resides in Wales, this category appeared partially satisfied. The researcher’s knowledge of Ghana and Singapore’s national, historical and PESTLE contexts did not equate to that of the Welsh context, and so a plan to mitigate a lack of familiarity was implemented.

Firstly however, regarding Greator et al’s (2019) position that effective analysis of subject content requires subject experts, it was felt that this criterion had been partially satisfied as the researcher is a former teacher of citizenship education, more specifically they have experience delivering several of the subjects the study is investigating, including *PSE* (WAG, 2008) and *ESDGC* (WAG, 2008a).

The plan to mitigate the researcher’s unfamiliarity with the Ghanaian and Singaporean subject content involved iterative readings of both the curriculum documents themselves as well as secondary literature addressing the subjects they represent. However, the plan to mitigate unfamiliarity with the national contexts of these two countries was less simple, and in the first instance involved the compilation of country narratives. This involved writing extensive profiles of each country, addressing their geographies, demographics, populations, economies, cultures, and educational systems. This process involved desk research, and required periodic appraisals of domestic news feeds from both Ghana (including *Ghanaweb.com*) and Singapore (including *The Straits Times*) to stay abreast of relevant

current affairs. These strategies, though not elevating the researcher's understanding of Ghanaian and Singaporean national contexts to that of a native or resident, did undoubtedly mitigate a lack of familiarity. This was especially helpful as efforts to visit Ghana and Singapore, to better understand their systems of education, were also thwarted by Covid-19 restrictions.

4.8 Method of Enquiry: Document Analysis

4.8.1 Document Analysis and the Intended Curriculum

Document Analysis has been described as a “systematic procedure for reviewing or evaluating documents...”, where documents are “...examined and interpreted in order to elicit meaning, gain understanding, and develop empirical knowledge” (Bowen 2009:27). The intended curriculum, traditionally written out on paper and increasingly in digital format, broadly prescribes the teaching and learning to be conducted over a particular time period. Consequently, document analysis was considered the most logical means of enquiry into the intended curriculum. A key consideration was that the document analysis can illuminate both explicit and implicit meaning (Davie and Wyatt, 2021:401). While explicit meaning is easily accessed, implicit and deeper meanings often remain obscured. Document analysis enables access to those deeper meanings by illuminating patterns, in this case quantitative and qualitative patterns of convergence and divergence.

4.8.2: The Nature of Intent and Syllabus Assumptions

Syllabi are a central component of what Thijs and Van Den Akker (2009:10) terms the intended curriculum. This study adopts the assumption that curriculum documents express educational intentions, but focuses specifically on the syllabus as a social artefact, and as an officially sanctioned policy text, which directs educational activity within a nation. Rather than analysing curriculum development processes or the personal motives of participants, it examines the intentions communicated through the final authorised document.

This distinction aligns with Ball and Bowe's (1992) policy cycle approach, which differentiates between the context of influence, the context of policy text production, and the context of practice. Research based on curriculum documents can be thought of as situated within the context of policy text production. While interviews with policymakers, curriculum writers, teachers, or other stakeholders may illuminate curriculum development (i.e. the context of influence), they cannot provide definitive evidence of intent. Curriculum design is a collective process involving multiple actors, and no individual can claim sole ownership of the final text. Even comprehensive interview data would only offer subjective and retrospective interpretations rather than authoritative statements of intent.

Accordingly, this study treats syllabus documents as the most reliable evidence of governmental intent. Once formally approved and implemented, a syllabus becomes the authorised statement of educational priorities, regardless of the negotiations that preceded it. Intent is therefore understood as embedded within the syllabus itself. Through aims, learning outcomes, curriculum content, and assessment requirements, syllabi communicate what students should know, understand, value, and be able to do. Syllabus aims are particularly significant because they constitute explicit statements of educational intention, while assessment requirements reinforce these intentions by signalling which forms of knowledge, behaviour, skills, and dispositions are considered important.

The significance of syllabi extends beyond content alone. They establish the boundaries of educational activity for entire cohorts, determining what may be taught, what must be taught, and what will be assessed. In subjects concerned with citizenship, civic education, and social studies, they therefore offer valuable insight into the qualities, values, competencies, and dispositions governments seek to cultivate in future citizens. This understanding underpins the thesis's analytical framework and the development of KSM analysis. KSM analysis assumes that syllabus mechanisms such as aims, rationales, learning outcomes, core concepts, and assessment structures signal intent with varying degrees of emphasis. The location of an idea within these mechanisms matters, for if a concept appears in a syllabus aim, it can reasonably be inferred that particular importance has been assigned to it. Consequently, references throughout this thesis to governmental intentions over the past thirty years refer not to the private motivations of curriculum developers or ministers, but to intentions expressed through officially sanctioned syllabus documents at the point of publication and implementation.

4.8.3 Documentary Research as a Sole Method of Enquiry

Documentary analysis is most commonly employed as a complementary research method (Bowen 2009), and generally utilized for its capacity to triangulate findings, often in a cheap, time efficient and manageable way. Whilst this study also benefits from these often-cited advantages (Cardno, 2018) it used documentary analysis as a sole research method, which is rare. However, Bowen (2009:29) acknowledged the value of utilizing documentary analysis as a stand-alone method, arguing there are certain research problems that require it.

Illuminating change and continuity in the type of citizen, national governments seek to shape via their CEC is one such problem.

The study's focus on the intended curriculum meant that the research questions devised could be answered via analysis of the curriculum documents alone. No other method was necessary. Additional methods, aside from time and cost implications, would only have provided superfluous information and obfuscated findings. Interviews were conducted with researchers from England, Singapore, and Wales, including two emeritus professors of education, who have published prolifically on the Welsh context.

Ghanaian academics were contacted but did not respond. To be clear however, the purpose of these interviews was to establish context and help identify potential documents for analysis, not to triangulate findings. Other curriculum documents, including textbooks, despite their suitability for qualitative research via their rich detail and thick descriptions of concepts, are not necessarily distributed nationally, where curriculum frameworks and syllabi generally are, and so, more suited to cross-national comparison seeking to understand differences between nations.

4.8.4 Assessing the Quality of Documents

The quality of findings in documentary analysis will invariably reflect the strength of the data on which they are based. Several methods for assessing the quality of documents have been proffered in the literature. One such contribution by Scott (2016) sets out four criteria against which document quality should be assessed. They are:

1. *Authenticity*: Is the evidence genuine and of unquestionable origin?

2. *Credibility*: Is the evidence free from error and distortion?
3. *Representativeness*: Is the evidence typical of its kind, and, if not, is the extent of its untypicality known?
4. *Meaning*: Is the evidence clear and comprehensible? (Scott, 2016:3)

Using Scott's criteria to assess the quality of documents in this study, we see they are *authentic*, as the evidence was genuine and of unquestionable origin, with all documents having been obtained via official government websites, previously listed. The documents are also *credible*, as they are the original source, are not in any way being represented by a third party, and have not been reproduced to contain variation. Also, as errors and distortion were considered part of the data, they were subsequently analysed, sometimes fruitfully, as in the occasion where a syllabus included the phrase "public accountability" and was replaced with "social accountability" in a later section, possibly revealing a tension.

Further still, the documents selected in this study, conventional syllabi (and to a lesser extent, frameworks, and policy documents), are highly typical of the documents conventionally analysed in citizenship and curriculum studies. In fact, any study of the planned or prescribed curriculum generally use as their starting point these very documents. Even studies of pupil and teacher perceptions or curriculum efficacy tend to use these documents for triangulation (Faas and Ross, 2012, Engel 2014, Ghebru, et al 2020). So, in terms of Scott's criteria of *representativeness*, this study's documents (predominantly syllabi) can be considered very typical of evidence in the field.

The final of Scott's document quality checks relates to *meaning* and asks, is the evidence clear and comprehensible? Here once more, in part because each nation has generally followed the genre's common approach (aims, content and structure), meaning is apparent and accessible at one level (the superficial) and accessible at another (deeper meaning) level. In summary, according to Scott's checks, the study's dataset is authentic, credible, representative, and capable of elucidating meaning, making this a qualitatively trustworthy study.

4.8.5 Document Reactivity and Unobtrusiveness

In many forms of qualitative research, particularly focus groups and interviews, the researcher will inevitably influence the findings, despite their best efforts to do otherwise. The data produced through such methods is said to be reactive to the researcher. Documents however are non-reactive (Cardno 2021:626, Bowen 2009:31) meaning they do not change when being researched, and consequently counter concerns related to reactivity in qualitative research (Bowen, 2009:31).

Another strength lays in the time-capsule like effect of discontinued curriculum documents. Stuck in time and non-reactive to the researcher, which is to say unchangeable when employed in research (Bowen 2009), these documents offer a snapshot into, among other things, the past intentions of governments on shaping citizens.

4.8.6 Document Analysis: Tracking Change and Continuity

In 2009's *Document Analysis as a Qualitative Research Method*, Bowen describes five specific functions of document analysis (DA) as a method of enquiry. One of which is “tracking change and development” (2009:30), precisely the aim of this study by analysing thirty-three years of selected curriculum documents from each country. Bowen adds, “Where various drafts of a particular document are accessible”, such as consecutive iterations of a syllabus, they allow the researcher to identify changes between them. Bowen makes an important point that, “Even subtle changes in a draft can reflect substantive developments in a project...” (Bowen, 2009:30).

The specific changes tracked and explained in this thesis relate to conceptions of citizenship and the three identified dimensions. As demonstrated in the literature review, we can consider citizenship constituted by three dimensions; *rights and responsibilities*, *participation*, and *identity and belonging*. How these dimensions are framed, or whether they are included at all, in a country's CEC, are important decisions that have the capacity to shape quite diverse types of citizens.

4.9 Obtaining Documents for Analysis

4.9.1 Introduction

This section sets out the steps taken to obtain documents for analysis, from setting the parameters for document inclusion, to the challenges faced and mitigated, which included diminishing access of older documents, before addressing a later decision made in the research regarding whether or not to include new data as it emerged.

4.9.2 Setting Parameters for Document Inclusion

Setting parameters for document selection is an important task, which if done correctly, can produce a dataset appropriate to permit the research questions be answered (Morgan, 2022:72). The study employed a purposive sampling approach to document selection. This is a non-probability sampling technique, where the researcher's specialist knowledge can be used to inform case selection. Datasets tend to be smaller than in probability sampling, and are selected on the basis of a variety of criteria, which permit the answering of a given research question. (Rai and Thapa, 2015:12)

Documents were only included in the analysis if they were, a) written in English, b) implemented between 1991-2024, c) addressed ages 10 to 15, and d) had the stated aim of shaping future citizens, where this was confirmed in the official curriculum documents themselves. Twenty documents met the criteria (listed in Figure 4.1), five from Ghana, eight from Singapore, and seven from Wales.

Figure 4.1. List of curriculum documents included in the analysis.

Ghana:

- *Teaching Syllabus for Citizenship Education [Basic 4–6]* (CRDD, 2007a)
- *JHS Social Studies Teaching Syllabus* (CRDD, 2007)
- *Our World Our People Curriculum [Basic 4–6]* (NCCA, 2019)
- *Social Studies Common Core Programme (CCP) Curriculum JHS1/JHS3* (NaCCA, 2020)

- *Social Studies Common Core Programme (CCP) Curriculum JHS1/JHS3* (NaCCA, 2024)

Singapore:

- *Social Studies Syllabus [Lower Secondary Normal (Technical)]* (CPDD, 2005)
- *Secondary Social Studies: Normal [Technical] Syllabus* (CPDD, 2014)
- *Social Studies Teaching and Learning Syllabus: Normal (Technical)* (CPDD, 2020)
- *Humanities Teaching and Learning Syllabus: Social Studies Normal (Technical)* (CPDD, 2023)
- *Humanities Teaching and Learning Syllabus: Lower Secondary G1* (CPDD, 2024)
- *Civics and Moral Education Syllabus* (CPDD, 2007)
- *Character and Citizenship Education (CCE)* (SDCD, 2014)
- *Character and Citizenship Education (CCE)* (SDCD, 2021)

Wales:

- *Community Understanding: A Framework...* (CCW, 1991)
- *Developing the Curriculum Cymreig* (ACCAC, 2003)
- *Personal and Social Education Framework* (WAG, 2008)
- *Education for Sustainable Development and Global Citizenship* (WAG, 2008a)
- *Wales, Europe, and the World* (WAG, 2009)
- *Unity and Diversity* (WAG, 2010)
- *Draft Curriculum for Wales: Humanities AoLE* (WG, 2019)*

*Hereafter *Humanities AOLE (2019)* for quicker reference.

This sample was deemed appropriate for mixed methods analysis, attempting to demonstrate convergence, given the study's overarching research question, as a sample's appropriateness in document analysis depends on the research questions (Morgan, 2022:72).

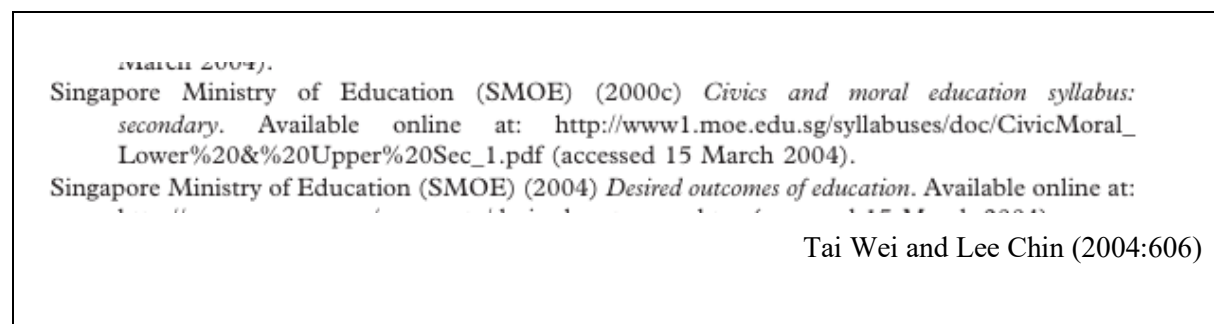
4.9.3 Overcoming Challenges in Document Acquisition

Document acquisition was a continuous and complex process. Identifying relevant curriculum documents required months of online research, as it was often unclear which documents were central, peripheral, affiliated, or officially authorised. Countries differed in whether they used frameworks, guides, syllabi, or sanctioned textbooks, and ongoing

revisions added further complexity. The purposive sampling strategy employed, focused on documents most relevant to shaping future citizens. This required understanding how documents related to one another, which were mandatory or advisory, which versions were current or discontinued, and crucially when those changes occurred.

Greator et al (2019:12) recommends the analysis of “official curriculum documents” and where they are difficult to locate, that “related literature” be searched. This approach was enacted using Google scholar and other search engines, though many cited were often no longer publicly accessible, as was the case in Figure 4.2 below, with Singapore’s 2000 *Civics and Moral Education Syllabus*, cited by Tai Wei and Chin (2004), that remained unavailable throughout.

Figure 4.2 Screenshot of cited but inaccessible document.



Establishing whether Singaporean CEC documents met the inclusion criteria was especially challenging. For example, until 2024 they operated multiple pathways, including the *Normal/Technical Pathway*, and the *Normal Academic and [Express] Pathway*. Furthermore, *Character and Citizenship Education* is studied by all students. Additional syllabus updates in 2023 and 2024 and the introduction of full Subject Based Banding in 2024 (MOE, 2026) added to this complexity.

Greator et al., (2019:12) also recommends “consulting experts” if document identification and acquisition is challenging. This proved to be the case, subsequently I corresponded with, not only the aforementioned researchers based in England, Singapore, and Wales, but also Ghana. It should be noted the aim of these correspondences was to locate documentation and establish context, not to triangulate findings, though that too would likely be a valuable exercise.

Of the twenty documents included in the final analysis, the current Ghanaian components were accessed via the country's official MOE or Ministry of Education website (moe.gov.gh), Singapore's similarly through their official MOE website (moe.gov.sg), and Wales through their official digital education hub (www.hwb.com). Some older documents were sourced from third parties, including, the British Library, Birmingham University, and Singapore's curriculum authority, the National Council for Curriculum and Assessment (nacca.gov.gh).

4.9.4 Diminishing Access to Older Documents

Regarding this researcher's experience and particularly in the case of Ghana within this research, document acquisition was a challenge. As older syllabi are replaced, they often become much more inaccessible, sometimes being removed from public access entirely. Consequently, if a convergence study of the period in question here (1991-2024) is not conducted now, issues with data access will likely grow, making such a study, or for that matter any study concerned with these documents, more difficult in the future.

The most persistent challenge to obtaining a suitable dataset, was the inaccessibility of key curriculum documents, where many cited in the literature remained inaccessible throughout the study. As shown, some curriculum documents were clearly referenced in bibliographies yet unobtainable in practice. This well-known limitation of documentary analysis (Chanda, 2021:7) proved problematic. Despite repeated telephone calls, emails, and use of the Ghanaian Ministry of Education's website instant message function, no response was received regarding curriculum documents produced before 2005. These materials remained inaccessible throughout the study, despite extensive web searches, library searches, and article snowballing. Examples of inaccessible syllabi included:

- Ghana Education Service (2001). Junior secondary school social studies syllabus.
- Ghana Education Service [GES] (2010). Syllabus for teaching social studies - JHS.

Even the Ministry of Education sites, where all *current* curriculum documents were sourced, rarely hosted older versions, making historic materials difficult to obtain. Ghanaian documents were particularly inaccessible despite contacting, the Ghana Education Service (GES), the *National Commission for Civic Education* (NCCE), *Ghana's Ministry of*

Education (MOE), the *National Council for Curriculum and Assessment* (NaCCA), the *Ghana Centre for Democratic Development* (GCDD) and *Ghana's Right to Information Commission* (RTI). Only the last two responded, and their guidance was followed, but no documents were obtained. Ghana's RTI responded with a letter (Appendix Five) offering initial hope, however adherence to the guidance therein did not produce any more documents.

The inaccessibility of Ghanaian and Singaporean curriculum documents prior to 2005 proved problematic, and presented two options, either rely on secondary literature to fill the gaps, or only assess their provisions from those years onwards. The latter option was deemed more acceptable for several reasons, not least that those dates still permitted the analysis of curricula development through at least three curriculum reforms, in all three countries, permitting an assessment of convergence. Ultimately, documents were included in the analysis if they were written to directly inform curriculum planning and enactment. The dataset therefore consisted primarily of syllabi, supplemented by a few, mainly Welsh policy documents, and learning frameworks.

4.9.5 Incorporating new data *after* data analysis has commenced.

A key decision during the research was whether to include newly implemented curriculum documents after the analysis had begun. Specifically, Singapore implemented two new versions of social studies in 2023 and 2024, and Ghana implemented an updated version of social studies in 2024 also. These were ultimately incorporated into the analysis. As the analysis was iterative, this was done without too much disruption. Given a general concern in the research was the balance to be struck on the number of documents to include, particularly given the study was mixed (quantitative and qualitative), and specifically because Ghanaian curriculum documents were fewer in number anyway, and often inaccessible, the addition of these documents were considered to strengthen the dataset as a whole, adding validity to the analysis performed.

4.10 Analytical Approaches Employed

4.10.1 Introduction

With participant countries selected, method of enquiry confirmed, and data collected, analysis commenced. This section addresses key analytical decisions made during the research, such as the recognition of syllabi as a specific genre of document (Fairclough, 2003) that subsequently required a unique approach to their analysis.

However, the first stage of the analytical approach undertaken, involved the identification of the three stages of curriculum development, and the specification of one of those stages for analysis. According to Thjis and Van Den Aker (2009:10), these include the intended, implemented, and attained curricula. This study is firmly concerned with the intended curriculum, which in this case has essentially meant the analysis of syllabus documents. However, syllabus documents do not conform to a standard understanding of a policy document, instead containing unique features, which perform various key functions. Fairclough refers to this issue in document analysis as ‘genre’. The next section elaborates on how this idea has shaped this research.

4.10.2 Fairclough’s Genre and Curriculum Documents

Fairclough’s concept of “*Genre*” in documentary analysis refers to the different “way[s] of acting and interacting linguistically” (2003:18). Different genres of document are too multifarious to list, but include for example, newspapers, reports, interviews, lecture notes, and syllabi for example. Each Genre has specific features and “structures texts in different ways” (2003:17). The genre of curriculum documents, more specifically syllabi, invariably conform to traditional structuring, with key syllabus mechanisms including, rationale, scope, syllabus aims, unit aims, and core concepts among others, all of which instruct classroom action in specific ways. Additionally, syllabus *content* is often organized hierarchically, from main themes, through sub-themes, and guiding questions. All of which means a syllabus is very unlike a standard document, and should subsequently be approached with this in mind.

This genre of document allows for a relatively easy analysis of the changeable priorities of governments regarding citizen shaping, over time, as concepts are easily identifiable through their inclusion or omission in key syllabus mechanisms. This realisation underpinned an exploratory approach to the analysis, addressed in section 4.10. Though a real strength of the

official government documents analysed in this study, is that they are generally very carefully inspected by government agents and agencies (such as curriculum authorities and ministries of education) so as to ensure the texts produced are all on point, that is to say they are all crafted to convey official government positions.

4.10.3 Three-pronged Analytical Approach

The analytical approach employed was threefold. Firstly, a basic content analysis of key terms and their synonyms was performed on all curriculum documents obtained. Secondly, an innovative approach was devised that tracked key terms and synonyms in the documents' seven key syllabus mechanisms (KSMs), which include the syllabus scope, syllabus rationale, syllabus aim[s], unit aim[s], syllabus theme[s]⁸, core concepts, and attitudes/values. This approach added nuance, illuminating which citizenship dimensions (rights and responsibilities, participation, and identity and belonging) were being emphasised, via their inclusion in the KSMs. However, a qualitative understanding of the meanings and contexts behind each reference was also required, as each pertinent mention carried layers of situated meaning that the quantitative analysis alone could not unlock. A third approach subsequently applied textual analysis techniques to the documents to illuminate the meaning of each reference to citizenship and its three dimensions.

Establishing what the countries mean when they address these dimensions in their CEC, through qualitative investigation, and highlighting which dimensions are being emphasised and deemphasised via quantitative investigation, provides an indication of what each respective country prioritises in their efforts to shape citizens. This is important, as governments will invariably want to shape citizens according to different aspirational visions of the good citizen, which themselves depend on the geographic, political, social, cultural, and ideological contexts in which they arise.

What follows is an account of the analysis undertaken, split, to firstly address the quantitative components, followed by the qualitative, though in reality, the basic content analysis and the textual analysis were conducted simultaneously, and the notion of analysing key syllabus

⁸ To qualify, the identifying term had to appear in the theme title.

mechanisms (KSMs) only arose after reflecting on the deficiencies of content analysis in capturing the nuance of a syllabus, where mentions do not necessarily carry the same weight.

4.10.4 Basic Content Analysis and Key Word Coding

Basic content analysis involves counting key terms or concepts in order to establish both explicit and implicit meaning. To Holsti (1969:14) content analysis is "any technique for making inferences by objectively and systematically identifying specified characteristics of messages". To Elo and Kyngas (2008:108) content analysis is a "systematic and objective means of describing and quantifying phenomena", that can be deployed to analyse manifest or latent content, or both. One way of analysing latent content, Elo and Kyngas (2008) suggest, is to "notice silence", i.e. where concepts are omitted. Conversely, saturation reflects the opposite situation. Both scenarios strongly indicate, in the former, an effort to overlook, ignore, downplay, and exclude a concept, and the latter an attempt to emphasise the concept.

Despite their inherent quantitative nature, content analyses are employed in both quantitative and qualitative paradigms and can be inductively or deductively applied. The content analyses conducted in the current study were deductive, based initially on a framework of six citizenship dimensions that after refinement became a framework of three citizenship dimensions (*rights and responsibilities, participation, and identity and belonging*). These dimensions, and selected synonyms formed the basis of the searched terms. This method, criticized by some quantitative specialists for being oversimplistic, incapable of detailed analysis and not sufficiently qualitative in nature (Elo and Kyngas 2008), was a valuable approach here due to its capacity to illuminate patterns of change and contrast.

However, one must be cautious when employing a content analysis. Firstly, there are homonyms present, meaning not all mentions of a term will be pertinent. Secondly, there is the not so trivial matter of context, where a term could be pertinent but be found in an impertinent context (for example the message "all rights reserved" is clearly related to the concept of rights, but ultimately not pertinent, as it pertains to copyright and not citizens' rights). Resultantly, all pertinent mentions of a term were checked for context.

An element of the content analysed in this study was structure. An analysis of structure and in particular how concepts and ideas would move around and through, up and down the curriculum structures, highlighted the changing relative importance of those concepts and ideas. Han et al (2013) argue however, that features such as structures, objectives, and subject categories are superficial and that the more substantive issues of values and norms are overlooked due to the difficulty involved in their investigation. My response is twofold, firstly, I do not believe these features to be superficial, speaking as a former teacher and user of curricula in the planning of my teaching, these features are key in directing activity. Secondly by employing basic content analysis (BCA) and textual analysis (TA), within a documentary analysis of curriculum documents, I have been able to combine a study of structure, objectives, and subject categories, with an analysis of values and norms, by tracking the quantifiable movement of key terms (BCA) and analysing their contexts (TA).

Also seeking to examine change over time in CEC, Moon and Koo (2011) used key word coding to analyse four consecutive versions of Ethics and Social Studies textbooks. They showed “clear quantitative changes over time” (2011:583) by “...read[ing] each textbook page by page, counting the number of keyword mentions and dividing this number by the total number of pages to obtain an average per page.” (2011:583). The current study replicated this approach to ensure comparability between documents, which ranged between 19 and 158 pages.

In this study, the three dimensions of citizenship identified in Chapter Two, as 1) *rights and responsibilities*, 2) *participation*, and 3) *identity and belonging*, formed a basic framework, from which the documents were analysed. Terms and synonyms selected for each dimension were identified (see Table 4.2) as those deemed most likely to locate curricula content related to the three dimensions. The terms selected for analysis included general synonyms, as well as synonyms found in the literature (e.g. participation and engagement) and in the initial curriculum document-read throughs.

Table 4.2 Terms and synonyms employed in content analysis.

Rights and Responsibilities	Participation	Identity and Belonging
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Rights via 'right*' Entitlements via 'entitle*' Freedoms via 'free*' Liberties via 'Libert*'	Responsibilities via 'responsib*' Obligations via 'obligat*' Commitments via 'commit*' Duties via 'dut*'	Participation via 'participat*' Including part, as in to take, or be. Contribution via 'contrib*' Engagement via 'engag*' Involvement via 'Involv*'	Identity and Identities via 'ident*' Belonging via 'belong*'
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All curriculum documents included in the final analysis, were held in digital (pdf) format. The search function within the pdfs allowed for quick identification and extraction (via cut and paste) of all instances where a citizenship dimension, or an identified synonym (listed in Table 4.2 above) appeared in a curriculum document. The analysis included all grammatic variations of pertinent terms, for example, participation, participating, participate, participant, partake, take part, and be part. Non-pertinent examples of terms were disregarded, and varied, but broadly fitted into the following categories: the subject of the sentence was not the citizen or pupil, i.e. 'the teacher participated in', the subject of the sentence is inanimate, i.e. 'a committed curriculum', the search term was being employed with an alternate meaning 'i.e. 'part of the approach' where part refers to a section, and not action. Many examples presented but were organised according to these rules.

Totals for each dimension and each curriculum document were compiled. *Total Mentions per Syllabus* (or TMS) figures, simply reflected the total number of times the dimension via the terms and synonyms listed in Table 4.2 were mentioned in total per syllabus. This provided useful context, especially when broken down and compared. *Reference Per Page* (RPP) figures added value, comparatively speaking at least, as they were arrived at by dividing a TMS figure by the number of pages in that particular syllabus, allowing both temporal and cross-national comparisons to be made between the documents' reference per page (RPP) values. From there, the quantitative data was tabulated and interpreted graphically to show trends of growth and decline of the inclusion of the dimensions in the different curriculum documents. Qualitative data analysed thematically within each dimension.

Tracking the RPP values was particularly useful, allowing different syllabi, of different page lengths, from different countries, and different points in time, to be compared directly – which is necessary given the different scales and sizes of the various CEC documents analysed. The TMS figure was also important in the comparative analysis as it illuminated scale. Both these perspectives were necessary to establish the speed and direction of any quantitative change in the CEC approaches.

4.10.5 Qualitative Capture and Developing Themes

The key word approach to coding identified above inevitably excludes sections of documents from analysis. To address this shortfall, and also to establish meaning more broadly, thematic analysis was employed.

In the data extraction phase, a choice was taken to maximise the size of the cut and pasted extracts. This meant copy and pasting several paragraphs before and after a term appeared. This often-involved whole page extractions, primarily to ensure no context was lost.

Discourse Analysis: What is it? The most pertinent point to make regarding Discourse Analysis (DA) is that there is no one version of it, no correct way to conduct it, and no plan to follow when performing it. Characterized more by diversity than unity in approach, DA continues to be adopted and adapted in the social sciences and humanities, to date resisting efforts to be simplified into a standardized and singular methodology for the analysis of discourse. Instead, and fundamentally a result of the rejection of the existence of an objective reality during the interpretivist turn, some social constructionists, postmodernists and poststructuralists among others, followed a denunciation of corresponding epistemological claims that objective reality or objective truth can be ‘got at’ through proper, or quantitatively framed empirical research, guided by experimental and positivist research designs. This proliferation has led to a succession of theoretical and methodological branching off.

This is turn has led to a proliferation of specific approaches to DA (Critical Linguistics, CDA, PDA and SFL among others) as well as specialist DA academics, although they may not appreciate being labelled as such (Foucault, Habermas, Fairclough, Van Dijk, Jan Blommaert, Rebecca Rogers, Paul Gee, Kress, Wodak, Meyer and others) DA journals (*Discourse*

Studies, Discourse and Society, and *Critical Discourse Studies*) DA institutes (*Centre for Ideology and Discourse Analysis*, Exeter, the *Centre for Discourse Studies* in Barcelona, and simply the *Discourse Institute*) and DA conferences (Critical Approaches to Discourse Analysis across Disciplines Or CADAAD University of Lancs, International Conference on Discourse Analysis or ICDA in Tokyo, and many more).

Before attempting to make sense of this diversity and decide on a course of action it was first necessary to take a step back and ask, what is discourse? How does it differ from language and text, if at all? And how can it help me with my investigation? To Fairclough, discourse was simply language viewed a certain way. Referencing CDA's emancipatory capacity as a social practice, Fairclough (1989) commented:

It aims to raise consciousness of how language contributes to the domination of some people by others, as a step towards social emancipation (1989:4)

Fundamentally, Fairclough and others concerned with discourse analysis, critically or otherwise, generally view discourse is a social practice, and an “irreducible part of social life” (Fairclough, 2003:2).

4.10.6 Manual Coding

A decision was taken to manually code the data. In ‘*Manual or electronic? The role of coding in qualitative data analysis* (2003), Basit tells us, “Most qualitative researchers analyse their own data.” and that deeper understanding requires “continually refine[d] interpretations” (2003:143). Whilst software like NVivo has changed the approach of many qualitative researchers to coding data, the need for deeper understanding and continued refining of interpretation, drove in part, the decision to manually code the curriculum documents in this study.

Another key reason for this decision was that syllabi are a particular genre of document, with specific mechanisms (rationale, aims, themes). Reports, interview transcripts, lecture notes, and syllabi, are all examples of genres of document, each with specific features that structure texts in different ways. It follows that different document types are more and less amenable to

different analytical techniques, depending on their complexity. Syllabi are in this sense, a relatively more complex form of document complete with standard features, including generally: scope, rationale, syllabus aim[s], unit aim[s], syllabus themes⁹, core concepts, and values/attitudes. Garica-Alvarez and Arias-Garcia (2022:7) similarly identified “justification, objectives, contents, evaluation criteria, and learning standards”, but the seven identified above were deemed appropriate, as they were broadly the terms employed in the syllabi the study proceeded to analyse¹⁰.

Despite usefully illustrating national trends, the basic content analysis was restricted when applied to syllabi as a specific genre of document. Essentially, it did not pick up differences in the way these key syllabus mechanisms were being employed to lay emphasis on the different dimension of citizenship. Out of this problem, the researcher developed a technique, KSM analysis, or key syllabus mechanism analysis. This rather complicated sounding approach was actually a simple case of counting, in which KSMs, the three dimension of citizenship, via the identified terms and synonyms employed in the basic content analysis, appeared. Much like with the TMS and RPP figures, each syllabus’s KSM data was recorded and compared over time, to illuminate a more nuanced view of changing emphases.

Placement within a syllabus matters because curriculum documents are hierarchically structured to signal priorities. References in sections such as syllabus aims and rationale carry greater interpretive weight than those embedded elsewhere in the syllabus as this particular role within the syllabus articulates official curriculum intent, i.e. the agreed upon central goals. Bernstein’s theory of *classification and framing* (1973) helps explain this phenomenon. Classification refers to the boundaries between knowledge domains, while framing concerns the degree of control over the communication of knowledge, what counts as legitimate content and how it should be taught. Strong framing occurs when curriculum intent is explicit, and as is argued here, positioned within KSMs such as stated aims or rationale statements. Weak framing occurs when references are dispersed in the general text of the document. Thus, a mention of “citizens’ rights” for example, in a general aim signals strong

⁹ To qualify as featuring in this KSM, a pertinent term (rights, entitlements, duties, responsibilities etc) must occur in the theme title or sub-title

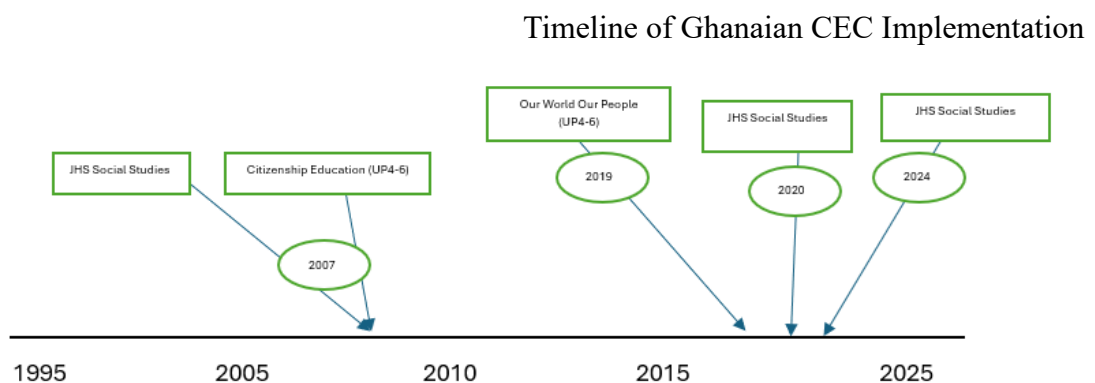
¹⁰ Terminology was standardized to ensure comparability across national contexts. For example, syllabus aims were also referred to as general aims and curriculum aims, attitudes presented as dispositions, and core concepts as key ideas

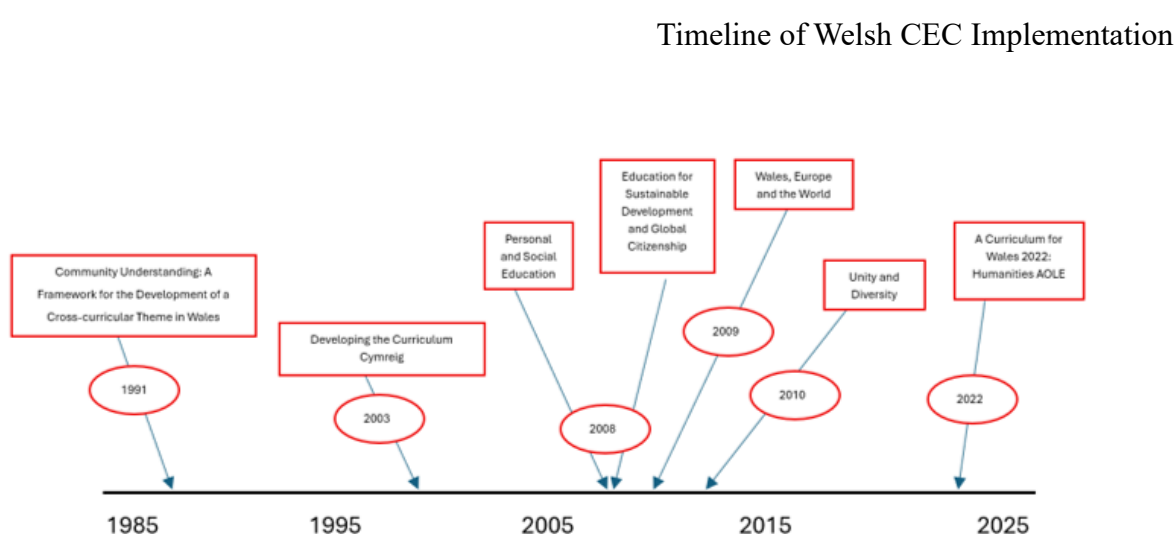
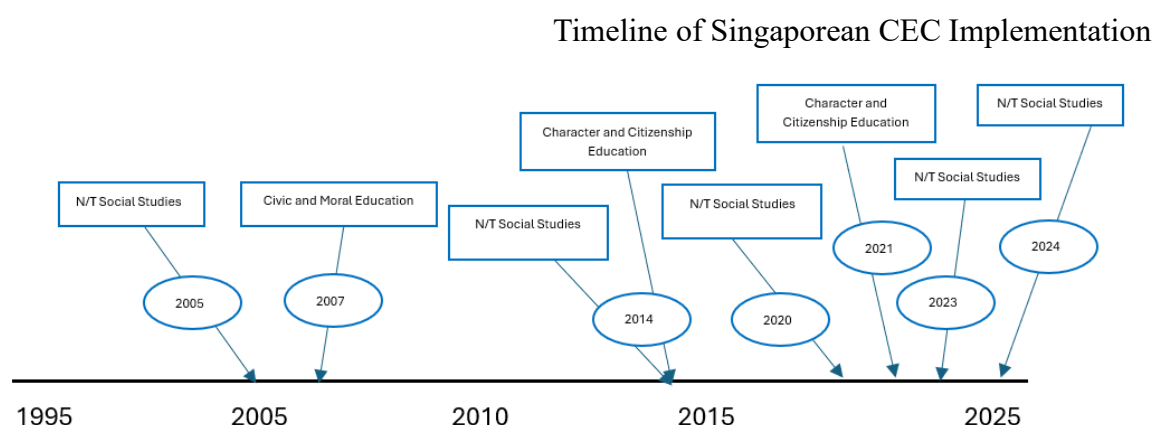
framing, it prescribes a core expectation. Conversely, the same concept buried in a case study for example, reflects weak framing. In short, placement signals emphasis. References in Key Syllabus Mechanisms (KSMs) are strongly framed and therefore more influential, whereas those outside these structures are weakly framed and peripheral. This distinction underpins the study's decision to treat KSM-based references as carrying greater interpretive weight than general mentions.

4.10.7 Document Implementation Timelines

The study was concerned with change over time, and so the syllabi were arranged chronologically, visualised as timelines in Figures 4.3, this initially seemed the best way to arrange the documents for analysis.

Figure 4.3 Syllabus Implementation Timelines





However, as the researcher developed more familiarity with the documents it became clear they were in several respects, incomparable. The next section explains the decision taken to divide each country's CEC documents into two analytical groups.

4.10.8 Document Grouping for Analysis and Reporting

Upon closer familiarity with the curriculum documents and the national education systems from which they hailed, and after drafting graphs to show how emphasis on the dimensions was changing, it was realised that a purely chronological approach to analysis was insufficient, and may not illuminate change so much as difference. This was a particular challenge for the quantitative analysis, where the goal was to identify convergence, by first

establishing change. Take for example Singapore, who until 2025, operated dual educational pathways, *Normal (Technical) Pathway* and the *Normal Academic (and Express) Pathway*. The initial dataset included both, and was found to fluctuate significantly, which was hard to explain. Splitting the provisions removed this problem and allowed for the identification of real change in syllabi that were designed to replace one another. The *Normal (Technical) Pathway* documents were retained in the analysis, and *Normal Academic (and Express) Pathway* documents excluded. This was partly due to pragmatic reasons but mainly because the latter pathway was accessible only for higher performing students, whereas the former reflected the universal entitlement in Singapore. Also, with Ghana, it made little sense to track change across Junior High School's *Social Studies* (CRDD, 2007), through Upper Primary's *Our World Our People* (NCCA, 2019) back through Junior High School's *Social Studies* (NaCCA, 2020) for example. In Wales also, it seemed imprudent to compare change across documents that on the one hand, were clearly central to the country's citizen shaping efforts, like *Community Understanding* (CCW, 1991), *PSE* (WAG, 2008) and *Humanities AOLE* (WG, 2019), with policy documents that were, on the other, designed only to inform and guide curriculum design decisions, like *Developing the Curriculum Cymreig* (ACCAC, 2003) and *Unity and Diversity* (WAG, 2010). Subsequently, the curriculum documents were sorted into the following analytical groups:

1. Ghana's *JHS Social Studies* Syllabi from 2007, 2020, and 2024 (Core Provision)
2. Ghana's 2007 *Citizenship Education* and 2019 *Our World our People* syllabi (Extended Provision)
3. Singapore's *N(T) Social Studies* syllabi from 2005, 2014, 2020, 2023, and 2024 (Core Provision)
4. Singapore's 2007 *Civic and Moral Education* along with 2014 and 2021's *Character and Citizenship Education* syllabi (Extended Provision)
5. Wales's 1991 *Community Understanding*, with 2008's *PSE*, and 2019's *Humanities AOLE* (Core Provision)
6. Wales's 2003 *Developing the Curriculum Cymreig*, with 2008's *ESDGC*, 2009's *Wales, Europe, and the World*, and 2010's *Unity and Diversity* (Extended Provision)

This approach had practical but more importantly theoretical advantages. Practically, using the analytical group names (in brackets above) in the finding's chapters, allowed for quick reference to quantitative change. For example, instead of writing out:

Singapore's Normal (Technical) Social Studies (CPDD, 2005) registered 'X' total mentions of the dimension participation, growing to 'X' in Normal (Technical) Social Studies (CPDD, 2014) before dropping to 'X' in Normal (Technical) Social Studies (CPDD, 2020)

Use of the group names meant this could be written as so:

In Singapore's core provision, the dimension participation was mentioned 'X' in 2005, rising to 'X' in 2014, before dropping to 'X' in 2020

This helped with clarity, but also in illustrating reliably, real change.

It was determined the most valid way to demonstrate curriculum change over time was to identify changes between sequential syllabus documents. That is to say, syllabi, where one syllabus has directly replaced another. This meant including successive versions of Singapore's *Character and Citizenship Education* (2014 and 2021), five versions of Singapore's *Normal (Technical) Social Studies* (2005, 2020, 2023, 2024), and three of Ghana's *JHS Social Studies* (2007, 2020, 2024). It also included Ghana's *Our World Our People* (NCCA, 2019), which, despite a change in name, was explicitly designed to replace *Citizenship Education* (CRDD, 2007). Due to the varied curriculum reforms introduced in Wales since 1991, the Welsh CEC examined were not strictly sequential, although they were chronological. While this limits direct comparison, the analysis remains valuable and should be interpreted within this context. Nonetheless, Wales also benefited from this analytical reorganisation, as it can be argued, that Wales also maintains both core and extended CEC provision. The key point is that the group names (core and extended) are to a degree arbitrary, but the reorganisation of the documents for analysis, was theoretically underpinned. From this position, the analysis could clearly identify change and continuity in both the way concepts were conceived and the way they were emphasised.

4.11 Quality and Trustworthiness in Mixed Research

4.11.1 Researcher Positionality and Reflexivity in Qualitative Research

In the following description of my positionality and reflexivity as researcher, and for this section only, I intentionally write in the first person, to respond to the “rigour” requirement in qualitative research, where transparency of decision-making is one of several strategies employed to achieve research trustworthiness (Adler, 2022:600)

In this sense, Pierre Bourdieu reminds us that the role of the researcher, is within, not distinct, from the research (Inghilleri, 2005:126), and that consequently as researchers we should be conscious of our role, which in this study was fairly substantial, mainly as I was a lone researcher. Being the lone researcher, and particularly the sole interpreter of the curriculum documents, I could not disentangle myself from my research. My presuppositions, worldview and life experience among other things are invariably going to affect the way I interpret the documents in the study. If someone else were to fulfil this role they would no doubt achieve different interpretations. It is crucial then to describe as transparently as possible all key decisions made, processes followed and their underpinning rationale. This it was hoped would mitigate the variability in human interpretation, narrow the possibility for bias, and strengthen the reliability of the study.

Unlike quantitative research which is generally undergirded by positivist and realist stances and seeks to generalise findings, qualitative research achieves credibility in other ways. Reliability, validity, and credibility are bywords for quality in quantitative research. However, according to Labuschagne “The validity and reliability of qualitative data depend to a great extent on the methodological skill, sensitivity and training of the evaluator.” (Labuschagne 2003:101). This, he said, was important for those aiming to conduct qualitative research, including qualitative versions of content analysis.

Whilst I am not a tenured professor, or field specialist, my qualifications and experience to date mean I have a sufficient level of methodological skill, sensitivity, and training necessary to conduct this research, or at the least mitigate some of the issues that can arise from professional inexperience. As a former teacher of *Citizenship Education* (DfE, 2013) in an English secondary school, and of *Personal and Social Education* (WAG, 2008) in Welsh

schools, I experienced at least two different perspectives on citizenship education, from neighbouring countries.

In obtaining my P.G.C.E (M Level) I passed a level 7 project on curriculum development. I also completed a master's in social and public policy, where I was trained in methods and conducted an individual qualitative research project. Pertinently to my methodology I also obtained a CELTA qualification and spent time teaching English to speakers of other languages. These qualifications and experiences I feel have engendered in me the methodological skill, sensitivity and training that Labuschagne (2003) believed was required to build reliability and validity.

Additionally, the comparative perspective I gained as a practitioner prompted me to ask questions such as, why does the English system operate a discrete subject for its citizenship provision, whilst Wales opts for a cross-curricular approach. The root of this question for me, was essentially which is most effective. I wondered upon my return to Wales, whether anything could be learned from the English model, to aid efficacious citizen shaping in Wales. As explained at the beginning of the chapter, the efficacy of such programs was my initial concern, before Covid-19 prompted me to consider an arguably deeper question, of how citizenship is conceived and constructed in the curricula documents in the first place.

4.11.2 Transparency and Accuracy in Reporting

Transparency of decision-making is one of several strategies employed to achieve what in quantitative paradigms is generally referred to as credibility and reliability (Loh 2013) but what in qualitative paradigms is more commonly referred to as "Trustworthiness" (Stahl and King, 2020). Qualitative research must be documented for it to be trustworthy. Its very design and conduct should be clear with "robust data collection techniques" accompanied by a thorough "documentation of the research procedure" (Bowen, 2009:29). In doing so, Bowen (2009) asserted, the research should be as transparent as possible and consequently trustworthy. I subsequently had a responsibility to describe as objectively and transparently as possible my own involvement in the research, from the identification of research questions, selecting participant nations, and gathering of data, to the interpretation and analysis of that data, which I hope to have done in this chapter so far.

Whilst transparency and accuracy are important in qualitative research, such efforts would be redundant if the study lacked coherence among its central components. This equally crucial aspect of research evaluation is now discussed.

4.11.3 Establishing Internal Coherence

Internal coherence in qualitative research refers to the degree of alignment between the different components of a research study. Namely it questions whether particular aspects of that study ‘fit together’, and includes invariably the study’s “ontology (nature of reality), epistemology (nature of knowledge), axiology (values), methodology and methods” (Palermo et al 2021:252). The need to establish internal coherence is an “often overlooked element of research quality”, though holding it as an evaluative principle is considered essential, and so guided decision making here to strengthen the study’s trustworthiness, i.e. its credibility and reliability.

The first practical step in achieving internal coherence was to establish my philosophical stance, which informed the research questions that sought to compare national curricula of different countries, subsequently determining an appropriate research design, an exploratory cross-national comparative and temporal analysis. The study’s method of enquiry *document analysis* was selected, given the documentary nature of curriculum prescriptions. Finally, the particular mix of methods that included, content, textual, and the experimental key syllabus mechanism analysis, were considered suitable for the study’s overarching aim of establishing (or otherwise) convergence.

4.12 Chapter Conclusion

This chapter has set out and justified the methodological foundations of the study, demonstrating how a complex and evolving research design was carefully constructed to address the research problem. The impact of the COVID-19 pandemic was shown to be pivotal, necessitating a substantial redesign of the original study. While this constrained the research to the intended curriculum, it also enabled a more theoretically robust cross-national and temporal comparison suited to investigating curriculum convergence under conditions of

accelerated globalisation. The revisiting of the research problem and questions clarified citizenship as a contested, historically situated concept, requiring a cumulative set of questions capable of tracing both change and continuity. The articulation of an interpretivist philosophical stance and an inductive–deductive hybrid logic of enquiry provided a coherent foundation for iterative refinement of the analytical framework, ensuring alignment between epistemology, research design, and methods.

The chapter also justified key design decisions relating to the comparative, cross-national, and temporal nature of the study. The selection of Ghana, Singapore, and Wales as meaningfully contrasting postcolonial cases, alongside a clearly defined age range and study period, balanced theoretical ambition with pragmatic constraints. These choices addressed notable gaps in the citizenship education literature, particularly the underrepresentation of African contexts in comparative studies.

Document analysis was defended as both an appropriate and sufficient method of enquiry for examining the intended curriculum. The combined use of basic content analysis, qualitative textual analysis, and the innovative Key Syllabus Mechanism (KSM) analysis enabled the study to capture both emphasis and meaning within curriculum documents. Finally, transparency, reflexivity, and internal coherence, were foregrounded as central to ensuring trustworthiness to the qualitative elements of this mixed methods interpretive study. Having established and justified the methodological approach, the next chapter turns to the findings, presenting what the analysis reveals about how citizenship has been included, omitted, framed, and reframed within Ghanaian, Singaporean, and Welsh CEC, since 1991.

Chapter Five: Rights and Responsibilities

5.1 Introduction and Chapter Structure

This chapter presents a comparative analysis of how Ghanaian, Singaporean, and Welsh citizenship education curricula (hereafter CEC) have included, omitted, and framed the citizenship dimension *rights and responsibilities* between 1991 and 2024. It is important to note, as outlined in Chapter Two, that whilst in the overall study, rights and responsibilities are considered a single citizenship dimension; to allow for a clearer comparison between them this chapter presents and discusses rights and responsibilities separately. Using content and textual analysis, the chapter charts the changes in the frequency and interpretation of the concepts over time in the countries CEC. A new analytical technique, Key Syllabus Mechanism (KSM) analysis, was also deployed to explore with greater nuance, how countries have emphasised and deemphasised each concept.

In general, rights safeguard individual freedoms, while responsibilities prevent infringement of the freedoms of others, and legitimize national government. Globalisation has introduced universalist notions of human rights and global responsibilities, most prominently environmental protection, alongside traditional state-centric views. Examining how these concepts appear in a country's CEC at various points can reveal the type of citizen each government seeks to shape, as well as how these change, or remain the same through sequential curriculum reforms.

This chapter analyses how the countries' CEC have included, omitted, and framed rights and responsibilities. Following the introduction and chapter structure (5.1), the chapter traces changing quantitative emphases on rights and responsibilities, showing the former to be in general decline and the latter to be broadly growing (5.2). Section 5.3 examines evolving curricula conceptions and types of citizens' responsibilities, and explores how responsibilities are scaled locally, nationally, globally, and in multilayered forms (5.4). Section 5.5 explores

whether citizens' rights are conceived as universal human rights or state-derived entitlements and explores how rights are embedded in contrasting ideas of justice and the law. Section 5.6 examines how these rights are situated across local, national, and global scales, before Section 5.7 offers conclusive remarks.

5.2 Shaping Responsible and Rights-Aware Citizens: Changing (Quantitative) Emphasis

5.2.1 Introduction

The quantitative analysis conducted in this mixed-method study took three forms. Firstly, a basic content analysis of the key terms and synonyms, rights (entitlements, freedoms, liberties) and responsibilities (obligations, duties, commitments) was performed. Specifically, total mentions per syllabus (TMS) and average references per page (RPP) values were recorded and tabularised (Tables 5.1 and 5.2 below). This essentially illuminated trends of emphasis and deemphasis. Secondly, changing curricula balances between rights and responsibilities RPP values were compared graphically and discussed. Finally, an innovative analytical approach outlined in Chapter Four, devised purposefully for this study, Key Syllabus Mechanism (KSM) analysis, was implemented. This allowed for a more nuanced understanding of how the country's design CEC to emphasise and/or deemphasise rights and/or responsibilities. Collectively, these analytical techniques revealed a general decline in emphasis on shaping rights-aware citizens, and a growing emphasis on shaping responsible citizens. The next four sections set out the evidence and data supporting these claims.

5.2.2 Citizens' Rights: A Declining Emphasis

Table 5.1 shows a declining emphasis on citizens' rights in the Ghanaian and Singaporean CEC analysed, regarding the volume of curriculum attention paid to the concept, at least in terms of References Per Page (hereafter RPP) and Total Mentions per Syllabus (hereafter

TMS). Wales however recorded a decline in RPP in their core provision, but an overall increase in RPP and TMS elsewhere in their data.

Table 5.1 References to the Citizenship Dimension *Rights*

	No. of Pages	Rights Mentions	Entitlements Mentions	Freedom Mentions	Liberties Mentions	Total Mentions per Syllabus (TMS)	Dimension References per Page (RPP) [to 2dp]
Ghana							
<i>Core Provision</i>							
JHS Social Studies 2007	51	39	1	10	1	51	1.00
JHS Social Studies 2020	158	29	1	2	0	32	0.20
JHS Social Studies 2024	129	40	1	0	0	41	0.32
<i>Extended Provision</i>							
Citizenship Education (2007)	44	51	0	4	0	55	1.25
Our World Our People (2019)	82	29	2	0	0	31	0.38
Singapore							
<i>Core Provision</i>							
Social Studies (2005)	19	0	0	0	0	0	0
Social Studies (2014)	49	0	0	0	0	0	0
Social Studies (2020)	57	1	0	0	0	1	0.02
Social Studies (2023)	32	1	0	0	0	1	0.03
Social Studies (2024)	48	1	0	0	0	1	0.02
<i>Extended Provision</i>							
Civics and Moral Education (2007)	71	10	0	6	9	25	0.35
Character and Citizenship Education (2014)	60	1	0	0	0	1	0.02
Character and Citizenship Education (2021)	34	0	0	0	0	0	0
Wales							
<i>Core Provision</i>							
Community Understanding (1991)	19	14	1	2	0	17	0.89
PSE (2008)	36	17	7	0	0	24	0.67
Humanities AOLE (2019)	84	51	2	0	0	53	0.63
<i>Extended Provision</i>							
Developing Curriculum Cymreig (2003)	66	0	1	0	0	1	0.02
ESDGC (2008a)	54	23	1	1	0	25	0.46
Wales Europe and the World (2009)	52	9	3	0	0	12	0.23
Unity and Diversity (2010)	67	45	0	4	0	49	0.73

To break the figures down, the table shows an overall decline in RPP to citizens' rights in Ghana's *core* provision, falling from a high of one reference per page on average in 2007,

down significantly to 0.22 RPP in 2020, before recovering slightly to 0.32 RPP in 2024, which notably was still less than a third of 2007's figure. TMS also decreased from fifty-one to thirty-two, before rising to forty-one, in 2007, 2020, and 2024, respectively. Ghana's *extended* provision followed a sharper downward trend, from 1.25 RPP and fifty-five TMS in 2007 to 0.38 RPP and thirty-one TMS in 2019. These patterns suggest shaping rights-aware citizens is becoming less of a focus in Ghana.

Substantially lower volumes of curriculum attention have been paid to citizens' rights in Singapore. Their *core* provision barely mentioned rights at all. The concept was literally absent in 2005 and 2014, appeared marginally at 0.02 RPP in 2020, peaked at a nominal 0.03 in 2023, before dropping back to 0.02 in 2024. Across the five versions of *Normal (Technical) Social Studies* that constitute Singapore's *core* provision in this study, rights were mentioned just three times, highlighting how this dimension of citizenship has essentially been omitted through several curriculum reforms, and only addressed sparsely when included. Singapore's *extended provision* in 2007 mentioned rights every third page, but this fell sharply from 0.35 RPP and 25 TMS in 2007 to 0.2 RPP and 1 TMS in 2014, to zero in 2021. The fact that Singapore's *extended provision* has seen rights mentions decline terminally, whilst their *core* provision simultaneously introduced references to rights, having previously omitted them, suggests a possible tension.

Ghana and Singapore have either, omitted, reduced, or included negligible rights references in their CEC. Wales by contrast, though presenting a mixed picture, mainly increased rights references. TMS values increased substantially in both their *core* (seventeen in 1991 to fifty-three in 2019) and *extended* (one in 2003 to forty-nine in 2010) provisions, as did the RPP values in the country's *extended* provision from 0.02 (2003) to 0.73 (2010). However, RPP values in the country's *core* provision decreased from 0.89 in 1991 to 0.67 in 2008 to 0.64 in 2019, though remaining comparatively high compared with Ghana and Singapore. This is an important observation, which arguably reflects, rather than a limited focus in recent syllabi, a saturated focus in earlier syllabi, namely *Community Understanding* (CCW, 1991). Overall, the values show a strong emphasis on shaping rights-aware citizens in Wales.

In summary, we see clear divergence between on the one hand Ghana and Singapore, who have scaled back emphasis on rights, and Wales on the other, who, have generally increased

theirs and where they have not, values remain comparatively high. The next section addresses the equivalent changes in RPP and TMS values for citizens responsibilities.

5.2.3 Citizens Responsibilities: A Growing Emphasis

Table 5.2 shows long-term variability rather than uniform trajectories, with Ghana exhibiting mixed but overall growth (especially in their extended provision), Singapore shifting from fluctuation to a recent de-emphasis, and Wales maintaining a consistently strong presence despite cyclical rises and falls, though they are arguably the result of the varied foci of curriculum interventions in Wales over the period in question, more than a deliberate change in emphasis on citizens responsibilities in their CEC.

In Ghana, emphasis on citizens responsibilities was mixed, although overall growth could be discerned. Their core provision recorded a drop from 0.43 RPP for the citizenship dimension responsibilities in 2007, to 0.16 RPP in 2020, before recovering slightly to 0.22 RPP in 2024. At the same time however, TMS increased from 22 in 2007 to 26 in 2020, to 28 in 2024. Meanwhile Ghana's *extended provision* recorded clearer signs of growth, with fifty-eight TMS and 1.32 RPP in 2007 rising to 165 TMS and 2.01 RPP in 2019.

Singaporean CEC presented a different pattern. Their *core provision* recorded exactly the same RPP (0.42) in the earliest syllabi in the provision (2005) as with the most recent (2024), having risen to a high of 1.16 in-between in 2014. However, TMS values recorded double in 2024 that of 2005. Singapore's *extended provision* presented a clear pattern of decline in both TMS (140 in 2007, 80 in 2014, and 37 in 2021) and RPP (1.97 in 2007, 1.33 in 2014, and 1.09 in 2021) values. Importantly, the table also shows that between 2020 and 2023 the trend of increasing TMS and RPP values was reversed, having since fallen in line with the country's extended provision, meaning despite the variability in Singapore over the years, a clear trend towards deemphasising responsibilities has recently emerged – at least in terms of this basic content analysis. As will be shown in Subsection 3.2.5, a different picture emerges when seen through the lens of KSM analysis.

Table 5.2 References to the Citizenship Dimension *Responsibilities*

	No. of Pages	Responsibilities Mentions (Including Part as in Take)	Obligations Mentions	Duties Mentions	Commitments Mentions	Total Mentions per Syllabus (TMS)	Responsibilities References per Page (RPP) [to 2dp]
Ghana							
<i>Core Provision</i>							
JHS Social Studies 2007	51	15	3	4	0	22	0.43
JHS Social Studies 2020	158	23	1	0	2	26	0.16
JHS Social Studies 2024	129	26	0	0	2	28	0.22
<i>Extended Provision</i>							
Citizenship Education (2007)	44	47	1	1	9	58	1.32
Our World Our People (2019)	82	94	0	9	62	165	2.01
Singapore							
<i>Core Provision</i>							
Social Studies (2005)	19	4	0	0	4	8	0.42
Social Studies (2014)	49	52	0	0	5	57	1.16
Social Studies (2020)	57	60	0	0	3	63	1.11
Social Studies (2023)	32	19	0	0	2	21	0.66
Social Studies (2024)	48	17	0	0	3	20	0.42
<i>Extended Provision</i>							
Civics and Moral Education (2007)	71	114	2	7	17	140	1.97
Character and Citizenship Education (2014)	60	59	0	3	18	80	1.33
Character and Citizenship Education (2021)	34	32	0	0	5	37	1.09
Wales							
<i>Core Provision</i>							
Community Understanding (1991)	19	8	0	0	0	8	0.42
PSE (2008)	36	37	0	0	4	41	1.14
Humanities AOLE (2019)	84	34	0	0	7	41	0.49
<i>Extended Provision</i>							
Developing Curriculum Cymreig (2003)	66	7	0	0	0	7	0.11
ESDGC (2008a)	54	13	0	0	0	13	0.24
Wales Europe and the World (2009)	52	19	0	0	0	19	0.37
Unity and Diversity (2010)	67	10	0	0	0	10	0.15

In a curious development, Wales's extended provision mirrored that of Singapore's core provision, regarding responsibilities' RPP increasing and decreasing over time before

stabilising at comparable levels in the first (0.11 in 2003) and most recent syllabi (0.15 in 2010) analysed, having reached a high of 0.37 in 2009. TMS figures also rose and fell, with the earliest syllabus recording seven TMS (2003) and their most recent, ten TMS (2010), having reached nineteen in-between in 2009. A clearer pattern of growth could be discerned regarding TMS values in Wales's *core provision*, with eight in 1991, rising to forty-one in 2008 and 2019. However corresponding RPP values again rose and fell, before again stabilising at around the same level in the country's most recent (0.49 in 2019) syllabus in the provision, as the earliest (0.42 in 1991) having reached a high of 1.14 RPP in 2008. Collectively the data shows a consistently strong representation of citizens responsibilities in the Welsh CEC, despite the variability of rising and falling TMS and RPP values.

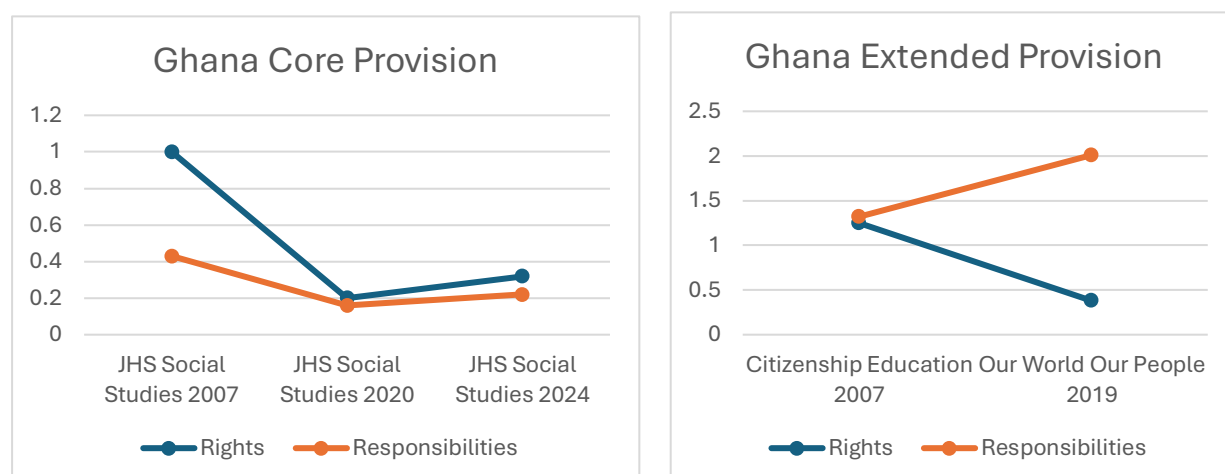
Thus far, the chapter has quantitatively addressed general country trends relating to the dimension rights and responsibilities, broadly showing the former is declining whilst the latter is in growth. The following section looks at each country's *core* and *extended* provisions (RPP¹¹ only) graphically, to highlight the changing balances of rights and responsibilities RPPs in each country.

5.2.4 Balancing Rights and Responsibilities: National Comparative Breakdowns

The balance of rights and responsibilities in a country's CEC will invariably reveal one of three orientations: rights-leaning, responsibilities-leaning, and broadly balanced. A rights-leaning curriculum may encourage participation or reduce discrimination for example but may also neglect civic duty and the needs of society, while a responsibilities-focussed approach may develop law abiding responsible citizens, but risks enabling rights abuses due to a subsequent lack of rights-awareness among citizens. Ghanaian (Figure 5.1), Singaporean (Figure 5.2), and Welsh (Figure 5.3) *core* and *extended* provisions are plotted as graphs below to highlight the changing balances between rights references and responsibilities references in each provision. The graphs also visually depict the trends discussed in the previous sections.

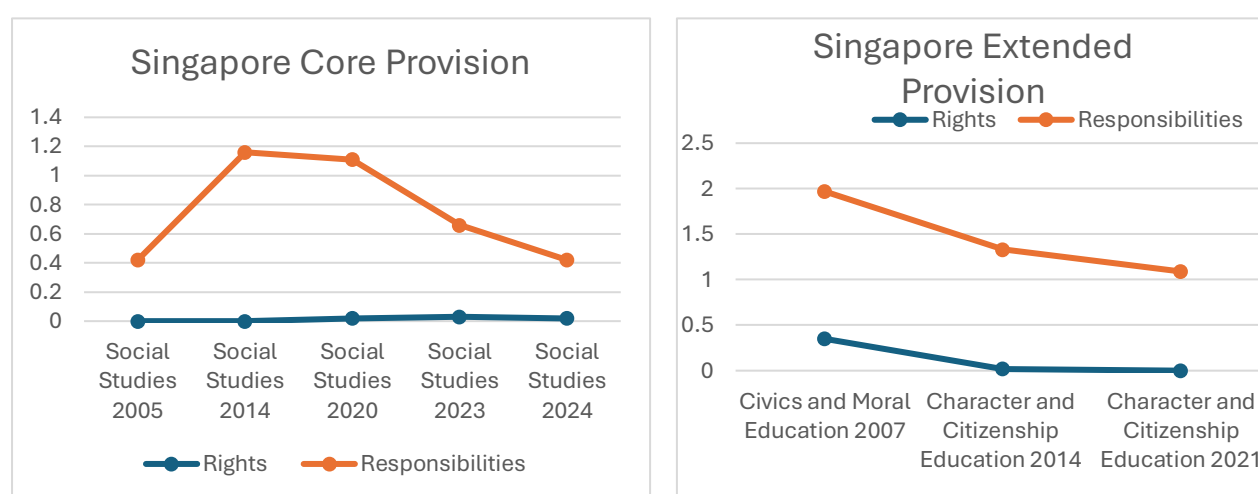
¹¹ RPP values allow for comparison across contrastingly sized documents, which describes the documents in the analysis which range from 19 to 158 pages.

Figure 5.1 References Per Page values (RPP) for Ghana's Core and Extended Provisions



Ghana's *core* provision (i.e. three consecutive versions of JHS Social Studies) has consistently included more references to rights than responsibilities. In 2007, rights were referenced more than double the frequency of responsibilities. The gap narrowed in 2020 as both concepts were referenced less but widened again slightly in 2024. Ghana's *Extended* provision, albeit based on just two data points, shows an abrupt departure from a position of near balance, to one where citizens' responsibilities are referenced more than four times as frequently as citizens' rights. Collectively these changes reflect a transition towards a responsibilities-leaning curriculum.

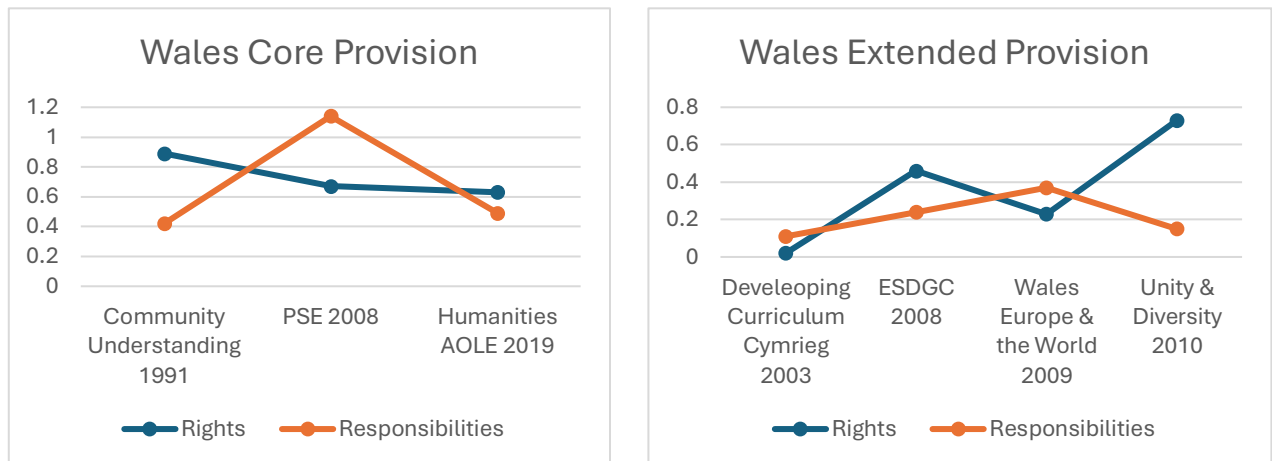
Figure 5.2 References Per Page (RPP) for Singapore's Core and Extended Provisions



Similarly, in Singapore, both provisions strongly emphasize responsibilities, with rights absent in their core provision in 2005 and 2014 and also their extended provision by 2021.

Despite being in decline, references to citizens responsibilities remain consistently high. Taken together, these changes strongly suggest Singapore has consistently operated a responsibilities-leaning CEC.

Figure 5.3 References Per Page (RPP) for Wales's Core and Extended Provisions



Wales's core and extended provisions showed variability, but again, this is arguably due to the diverse nature of the curricula interventions in Wales during this period, each representing different stakeholders to Welsh curriculum development, including but not exclusively, the *Curriculum Council for Wales* (CCW), the *Qualifications, Curriculum and Assessment Authority for Wales* (ACCAC), and the *Welsh Assembly Government* (WAG). Nevertheless, there is a trend toward greater rights inclusion in recent years, with a significant spike upwards in the *Unity and Diversity* (WAG, 2010) and a corresponding downturn in responsibilities references, so one might conclude that the Welsh CEC is rights-leaning.

In summary, regarding curricula balances between rights and responsibilities RPP values, Ghana's core provision is slightly more rights-oriented, but their extended provision is clearly responsibilities-oriented, which together can be considered responsibilities-leaning. Singapore leans firmly toward a responsibilities-orientation, with a diminishing and often minimal role for rights, while Wales exhibits variability in the way these two concepts are addressed, but with overall growth trend undergirding both rights and responsibilities.

So far, the chapter has compared directly the countries' RPP and TMS values, in words, in table form, and graphically, to illuminate trends of emphasis and de-emphasis, and to illustrate the changing curricula balances between the concept deployments in the countries' CEC. These are useful indicators of change and relative importance, but they do not capture the full picture when applied to syllabi, as a specific document type. This is because syllabi, as a specific genre of document (Fairclough, 2003:17), differ from standard policy documents in that the placement of concepts within their structural framework affects their interpretive weight. This study takes the view that references embedded in particular key syllabus mechanisms (KSMs) such as, aims and core concepts, have a greater influence on intended outcomes, than those appearing in the general body of text. The power of these mechanisms is known, and their conscious design, can be revealing.

Ultimately, syllabi are unique, and able to emphasise concepts in such ways that basic content analysis simply does not capture. The next section describes and applies an innovative KSM analysis, that the researcher offers as a unique approach for understanding how concepts transit KSMs of sequential syllabi, and what this tells us about each country's ideal type citizen.

5.2.5 Key Syllabus Mechanisms (KSM) Analysis: Emphasising Responsible Citizenship over Rights-Awareness

To show how Ghana, Singapore, and Wales, have each employed Key Syllabus Mechanisms (KSMs) in the service of shaping rights-aware and responsible citizens, the study identified seven KSMs: *Scope, Rationale (or Philosophy), Syllabus Aims, Unit Aims, Syllabus Themes, Core Concepts*, and *Attitudes/Values*¹², and recorded every time the terms *rights* or *responsibilities* and any identified synonyms (entitlements, freedoms, liberties and obligations, duties, commitments) appeared in them. Additionally, all lexemes and inflected forms of each term and synonym were included, though mentions deemed impertinent were not.

¹² Terminology was standardized to ensure comparability across national contexts. For example, attitudes also presented as dispositions, and core concepts as key ideas.

The basis for the application of this additional technique was primarily that these mechanisms perform specific functions, subsequently references located within them should be considered more significant than those in non-KSM sections. This could be taken further where different weightings could be assigned to the different functions, but this is beyond the scope of this study. Here a binary approach has been taken, where the concept is either included in a KSM or not, and Tables 5.3 to 5.8 show which KSMs included the concepts rights and responsibilities in each countries' core and extended provisions of CEC. This is an important undertaking because placement signals emphasis and authority, and all three countries are increasingly placing citizens responsibilities or the responsible citizen in the KSMs of their curricula, whilst the opposite is happening with rights. This is a particularly interesting finding, which mostly aligns with the RPP values discussed in Section 5.2, which uncovered a responsibilities-dominated CEC in Singapore, and a strong surge of responsibilities RPPs in Ghana. However, it does not align with the Welsh data, which shows responsibilities outnumbering rights in the KSMs of the country's most recent CEC. This suggests a tension, or possible dual priorities, as rights and responsibilities are ultimately not dichotomous priorities.

Table 5.3 KSMs featuring Rights and Responsibilities in Ghana's Core Provision

Syllabus Title > Syllabus Mechanism V	<i>Social Studies 2007</i>		<i>Social Studies 2020</i>		<i>Social Studies 2024</i>	
	<i>Rights</i>	<i>Responsibilities</i>	<i>Rights</i>	<i>Responsibilities</i>	<i>Rights</i>	<i>Responsibilities</i>
SCOPE	X		X			
RATIONALE		O		O		O
SYLLABUS AIM[S]	X			O		O
UNIT AIM[S]	X	O		O		O
SYLLABUS THEMES (in Title)	X		X		X	
CORE CONCEPTS						
ATTITUDES/ VALUES	X	O		O		O

Table 5.4 KSMs featuring Rights and Responsibilities in Ghana's Extended Provision

Syllabus Title > Syllabus Mechanism V	Citizenship Education 2007		Our World Our People 2019	
	<i>Rights</i>	Responsibilities	<i>Rights</i>	Responsibilities
SCOPE	X			
RATIONALE				O
SYLLABUS AIM[S]	X			O
UNIT AIM[S]	X	O		O
SYLLABUS THEMES (in Title)	X	O	X	O
CORE CONCEPTS	X	O		
ATTITUDES/ VALUES		O	X	O

Table 5.5 KSMs featuring Rights and Responsibilities in Singapore's Core Provision

Syllabus Title > Syllabus Mechanism V	Social Studies 2005		Social Studies 2014		Social Studies 2020		Social Studies 2023		Social Studies 2024	
	<i>Rights</i>	Responsibilities	<i>Rights</i>	Responsibilities	<i>Rights</i>	Responsibilities	<i>Rights</i>	Responsibilities	<i>Rights</i>	Responsibilities
SCOPE										O
RATIONALE				O		O		O		O
SYLLABUS AIM[S]				O	X	O	X	O	X	O
UNIT AIM[S]		O		O		O		O		O
SYLLABUS THEMES (in Title)		O		O						
CORE CONCEPTS				O		O				
ATTITUDES/ VALUES		O		O		O		O		O

Table 5.6 KSMs featuring Rights and Responsibilities in Singapore's Extended Provision

Syllabus Title > Syllabus Mechanism V	Civics and Moral Education 2007		Character and Citizenship Education 2014		Character and Citizenship Education 2021	
	<i>Rights</i>	Responsibilities	<i>Rights</i>	Responsibilities	<i>Rights</i>	Responsibilities
SCOPE	X	O		O		
RATIONALE						O
SYLLABUS AIM[S]		O		O		O

UNIT AIM[S]		O		O		
SYLLABUS THEMES (in Title)		O				O
CORE CONCEPTS	X	O				O
ATTITUDES/ VALUES	X	O		O		O

Table 5.7 KSMs featuring Rights and Responsibilities in Wales's Core Provision

Syllabus Title > Syllabus Mechanism V	<i>Community Understanding (1991)</i>		<i>PSE (2008)</i>		<i>Humanities AOLE (2019)</i>	
	<i>Rights</i>	<i>Responsibilities</i>	<i>Rights</i>	<i>Responsibilities</i>	<i>Rights</i>	<i>Responsibilities</i>
SCOPE						
RATIONALE		O	X	O	X	O
SYLLABUS AIM[S]				O	X	O
UNIT AIM[S]	X	O	X	O	X	O
SYLLABUS THEMES (in Title)	X				X	O
CORE CONCEPTS	X	O			X	O
ATTITUDES/ VALUES	X					

Table 5.8 KSMs featuring Rights and Responsibilities in Wales's Extended Provision

Syllabus Title > Syllabus Mechanism V	<i>Curriculum Cymreig (2003)</i>		<i>ESDGC (2008a)</i>		<i>Wales Europe and the World (2009)</i>		<i>Unity and Diversity (2010)</i>	
	<i>Rights</i>	<i>Responsibilities</i>	<i>Rights</i>	<i>Responsibilities</i>	<i>Rights</i>	<i>Responsibilities</i>	<i>Rights</i>	<i>Responsibilities</i>
SCOPE								
RATIONALE			X	O			X	
SYLLABUS AIM[S]			X				X	
UNIT AIM[S]			X	O	X		X	O
SYLLABUS THEMES (in Title)		O					X	
CORE CONCEPTS			X					
ATTITUDES/ VALUES							X	

Ghana presented a decline in KSMs featuring rights alongside an expansion of KSMs incorporating responsibilities, signalling a transition toward responsibility-focused

citizenship. Singapore reflects this trend even more strongly, with responsibilities dominating both core and extended provisions, where rights typically only appear in isolation, if at all. Wales, by contrast, demonstrated fluctuation over time, where *Community Understanding* (CCW, 1991) was strongly rights-oriented, *PSE* (WAG, 2008) presented a reduced focus, and *Humanities AOLE* (WG, 2019) introduced greater balance, with rights and responsibilities each appearing in five KSMs. Wales's extended provision has also oscillated, moving from rights-free in 2003 to rights-heavy in 2010, where the concept featured in five KSMs.

Across all three contexts, arguably the most influential of the KSMs - syllabus and unit aims - have been frequently employed in the pursuit of shaping responsible citizens, and less frequently to shape rights-aware citizens. The remainder of this section presents a focus on the KSM - syllabus aims. Syllabus aims are arguably the most influential KSMs, acting as explicit statements of curriculum intent. Across the data, curriculum aims frequently address citizens' responsibilities, but citizens' rights appear in only five aims in total. In Singapore, rights were generally absent from syllabus aims except for a repeated aim in *Social Studies* (2020, 2023 and 2024) where pupils were expected to:

understand the rights and responsibilities of citizens and the role of the government in society (2020:5, 2023:3, and 2024:6)

However, these references are largely isolated and lack follow-up, with only limited elaboration in the 2023 syllabus (CPDD, 2023:14and16), which could prompt claims of tokenism, and at least points to a tension. In Wales, *ESDGC* (WAG, 2008a) included the statement that learners should study “the issues they have a right to know about for their future” (2008:7), but no other Welsh syllabus aims included reference to rights. Similarly, rights do not appear in any of the Ghanaian curriculum aims analysed, despite high volumes of curricula attention attributed to rights elsewhere in their CEC.

Conversely, responsibility-oriented aims have expanded over time. In 2007, Ghana omitted responsibilities in the syllabus aims of their CEC, but later provisions introduced the aim for learners to “demonstrate responsible citizenship” (2019:v, 2020:xiii, and 2024:xiii). This is significant and consistent, suggesting a conscious and committed effort to use syllabus aims to shape responsible citizens. In short Singapore has also consistently prioritised responsibilities since at least 2005, with aims such as:

To inculcate in students a sense of appreciation and responsibility for the society and environment (CPDD, 2005:1)

and later, empowering citizens to:

... take personal and collective responsibility for effecting change for the good of society... (*ibid.* 2014:5, 2016:3, 2020:5, 2020b: 2023:5, and 2024:5)

This repeated aim was one of just a few references to collective responsibility, all of which occurred in the Singaporean CEC. This is another important finding that seemingly reflects the regional (continental) contexts, as Singapore and SE Asia more broadly have been heavily influenced by Taoism, Buddhism, and Hinduism among others, all of which have a common understanding of oneness, community, and environmental stewardship. Whilst contrasting notions of individualism and competition have undergirded western trends. In Ghana and Wales, citizens actions were portrayed as individual and generally not collective. Only Singapore, influenced by eastern philosophies such as Confucianism conveyed the collective nature of citizenship as an explicit responsibility of the citizen.

5.2.6 Conclusions

The quantitative analysis strongly suggests two fundamental trends, shaping responsible citizens is becoming more important, and shaping rights-aware citizens, less so. A subsequent question emerges, if more emphasis is being placed on shaping citizens responsibilities, how are those responsibilities conceived, and is this also changing. Are responsibilities conceived of as economic, political, social, or familial? Are they individual or collective? Are they local, national, or global? Just because the countries are converging in terms of increasing emphasis on shaping responsible citizens, it does not mean they conceive of those responsibilities in the same way. Much like the concept of citizenship itself, notions of what a citizen's responsibilities should be can differ significantly.

The main differences lay in that civic republicans like Dagger (2002) argue political responsibility to participate to be fundamental, communitarians like Etzioni (2011) broadly argue that a citizen's identity and responsibilities are inextricably linked to the community,

and liberals, such as Locke, who held narrow views of citizens responsibilities as mainly legal and political, but within representative system of government.

Importantly, quantitative analysis (TMS, RPP, and KSM) only illuminates part of the picture, highlighting changing emphases. To gain a better understanding, specifically of the meanings attributed to the values discussed above, it was necessary to delve into each one and explore the meaning, context, and prominence of each. The following sections (5.3-5.6) discuss how actual interpretations of the concepts of rights and responsibilities have changed over time.

5.3 Citizens Responsibilities: Changing Foci

5.3.1 Introduction

This section first addresses the most common expression found in all three countries CEC, that of social and civic responsibilities (5.3.2), before outlining a convergent fading focus on citizens' political responsibilities (5.3.3), as well as the divergent approaches to familial responsibility, a concept generally omitted in Wales, but one that is growing in focus in Ghana and Singapore (5.3.4). Finally, the section examines an emerging focus on responsible online citizenship and responsible decision making.

5.3.2 Social and Civic Responsibilities: Growing Focus

This section highlights a consistent curriculum focus on fostering socially and civically responsible citizens across the board, showing how responsible citizenship is a community-based endeavour, more so than a national or global consideration, at least in terms of the individual citizen.

At least as early as 2007, Ghana incorporated a unit in their dedicated *Citizenship Education* (CRDD, 2007a) provision, entitled “values and responsibilities in our community” (CRDD, 2007a:11) where the following reasons were listed for upholding societal values:

Preserves the society.
Finds us together as one people.
Gives us a sense of identity.
Promotes law and order.
Prevents child delinquency.
Makes people responsible (CRDD, 2007a:11)

From this list, we see the rationale for being a responsible community member is based on developing unity, obedience, and belonging. It was further stated that teachers should “Stress that pupils have the responsibility to uphold values in the community.” (CRDD, 2007:11). This is a rare instruction in a syllabus that reflects a concerted effort to inculcate these values in future citizens. It is as if the document author has taken a highlighter and circled this content and marked ‘important’.

This approach carried into 2019’s replacement syllabi, *Our World Our People* (NCCA, 2019), that set out in its rationale, a KSM, that learners will address “contemporary social challenges” which it describes as “sanitation, climate change and environmental degradation, social media and technology misuse, unhealthy living, and non-compliance of civic responsibilities.” (2019:iv). This is an enlightening list of examples to include, which reflects the social, environmental, and technological concerns facing Ghana. A big focus of this syllabus was the need for citizens to live in harmony with their neighbours (2019:3) and to “respect others” (2019:36). As with Singapore, the notion of harmony, was an important goal in Ghana, where at least eight tribal groups coexist, including the Ashanti-Akan, Mole-Dagbon, Ewe, Ga-Dangme, Gurma, Guang, Grusi, and Mande.

Similarly, Singapore has consistently and increasingly addressed citizens social and civic responsibilities. In their core provision for example, one of five syllabus aims in 2005 was for students to have “responsibility for the society and environment” (2005:1). In 2014 “meeting the needs of society” was outlined as a goal of the *21st Century Competency framework* (2014:41) that guides curriculum design, but responsibility also featured as a key concept, notably as “shared responsibility” (2014:34), and as a key understanding where everyone “has the responsibility to care” for society (2014:34). Where citizens responsibilities were explicitly addressed in this *Social Studies* (CPDD, 2014) syllabus, they were entirely social or civic in nature.

Additionally, in Singapore's *Desired Outcomes of Education* (another key educational policy that has guided curriculum design since 1997 and which is sometimes referenced in the curriculum documents themselves), a key outcome is the shaping of:

A concerned citizen...[who] is rooted to Singapore, has a strong civic responsibility, is informed about Singapore and the world, and takes an active part in bettering the lives of others around him" (2014:3)

Social responsibilities were consolidated in Singapore's *Social Studies* (CPDD, 2020) and featured in several KSMs, including the syllabus aims, to "understand the rights and responsibilities of citizens and the role of the government in society" and to "take responsible personal and collective actions to effect change for the good of society" (CPDD, 2020:5), the philosophy, to have an "...impassioned spirit to contribute responsibly to the society..." (CPDD, 2020:4) and again, the desired outcome of education (DOE) for learners, to:

...take responsible personal and collective actions to effect change for the good of society; and • be resilient in addressing concerns of society in spite of challenges faced.

The syllabus was scattered with additional references to responsibilities to community, and for social development, listing "civic responsibilities" as a core value (CPDD, 2020:31-37) no less than seven times. In 2023, this centralised focus on developing the citizens social responsibilities was maintained, again through the syllabus aims, to "have a sense of belonging to the nation, appreciate and be committed to building social cohesion in a diverse society" and to "take responsible personal and collective actions to effect change for the good of society" (CPDD, 2023:3), philosophy "with an impassioned spirit to contribute responsibly to the society" (CPDD, 2023:2) and once again the DOE (CPDD, 2023:3)

A concerned citizen... is rooted to Singapore, has a strong civic consciousness, are responsible to their family, community and nation and take active roles in improving the lives of others.

Again, additional references to community responsibilities (CPDD, 2023:15), and being a "caring member of society" (CPDD, 2023:21) means we can consider the syllabus socially

oriented. Most recently, Singaporean Social Studies, continued to foreground social responsibilities, in its aims (CPDD, 2024:6), philosophy (CPDD, 2024:6) and DOEs (CPDD, 2024:7), meaning fulfilling one's social responsibilities has been at the heart of Singaporean good citizenship, through several curriculum reforms.

This focus on the society, and other people, as opposed to self, was a retained message in the country's extended provision also, where a Social and Emotional Learning (SEL) competency was defined as that which:

Enable[s] us to examine and understand our own thoughts and emotions, develop a sense of responsibility and concern for others, and act for the good of self, others, and the society. When we apply these competencies, we live out our values and grow our character (2021:10)

And where students are told to:

... deepen their reflection of their roles and responsibilities in consideration of the broader social, cultural, national, and global contexts within which they live (2021:19)

And also, to practice "respect and responsibility in common spaces" (2021:30).

A focus on social development and community wellbeing also presented in Wales's core provision. Amply addressed in terms of RPP at least and aptly titled *Community Understanding* (CCW, 1991) their first effort at CEC was highly community oriented, and was designed to:

assist them in taking responsibility for, and control of, their own lives. At the same time they will be encouraged to contribute, as active, participating, critically reflective members of their communities in Wales, or wherever they may subsequently live. (CCW, 1991:4)

The syllabus also stated pupils "...should know of their responsibility in respecting, protecting and promoting the rights of others." (CCW, 1991:7), identifying "the social and moral responsibilities of the individual" (CCW, 1991:14) as key knowledge to be learned.

Where later, *PSE* (WAG, 2008) which included the aim for learners to be “personally and socially effective” (2008:4) and to “promote self-respect, respect for others...” (2008:4) consolidated a focus on personal and social development, as the name suggests. Helpfully clarifying the responsibilities of young citizens, the syllabus explicitly explains:

Learners should also consider their responsibilities as young citizens and be equipped to participate in community life through service and action which promotes the well-being of that community (2008:11)

Besides recognising learners *as young citizens*, which speaks to universalist discourses of children’s rights and participation, this quote illustrates the social nature of their expected behaviours. Additionally, the 2008 syllabus included a substantial number of references to the citizens social responsibilities, such as their responsibility for “social development” (2008:24), their “shared values” (2008:25a) and “personal relationships” (2008:23a&12). Most recently *Humanities AOLE* (WG, 2019) maintained a focus on the social but more frequently via calls to social action in the pursuit of a socially just society, indicating a social-justice oriented approach, to use Westheimer and Khane’s (2004) typology of the good citizen. This can be seen in the requirement for pupils to “develop a commitment to social justice and social action, within Wales and the wider world.” (2019:12) as humanities, it states, focusses on a “...commitment toward social action as caring, participative citizens of local, national and global communities” (2019:15). In this most recent syllabus, the phrase “social action” was included a substantial twenty-six times, where pupils were required to meet the achievement outcome to be “part of a group engaged in responsible social action, in my local community, to effect positive change.” (2019:72). This social perspective presents in the syllabus’s description of “human societies” which is oriented around social justice:

Human societies are complex and diverse, and shaped by human actions and beliefs.

- Justice and fairness in societies.
- Economic development of societies.
- Political structures in societies.
- The nature of citizenship.
- Social roles and responsibilities.
- Impact of actions on society. (WG, 2019:74)

In a what matters statement, which essentially reflect the *curriculum's* prescribed content, the syllabus consolidates these features:

In this what matters statement, learners should explore concepts including economic, environmental, and social sustainability; citizenship; power and authority; interconnectedness; justice and equality; rights; and social action and responsibility. (2019:76)

The prevalence of the citizens' social responsibilities throughout the document strongly suggests it is a current priority regarding good citizenship in Wales today.

In terms of the philosophical rootedness of these conveyed conceptions of citizenship, we see a clear indication of communitarian underpinnings to the notion of citizens responsibilities in Wales's most recent CEC, in the statement "the importance of the rules, roles and responsibilities in the various communities that they belong to" (WG, 2019:77). The acknowledgement of the idea that one can be a member of multiple communities simultaneously is a uniquely communitarian principle, and speaks to the Welsh understanding of one's social, communal, and civic responsibilities.

A focus on social issues and social development also spanned Wales's extended provision, where it was stated "social issues" were linked to "lifestyle choices" in *Wales Europe and the World* (WAG, 2009:21), where pupils were also told to:

Accept responsibility for all aspects of personal and social development and well-being – Act as positive role models – Exercise responsibility for group safety in social settings (WAG, 2009:41)

This focus was less clear in *Unity and Diversity* (WAG, 2010) however, with a handful of indirectly linked mentions, but no explicit or central focus on developing citizens' social responsibilities. Taken together, successive Welsh curricula demonstrate a sustained and increasingly explicit prioritisation of social development, community participation, and citizens' social responsibilities, evolving from community understanding and personal effectiveness toward overt commitments to social justice and social action. This trajectory reflects a distinctly communitarian conception of citizenship in Wales, in which learners are

positioned as members of multiple, interconnected communities with shared responsibilities for collective wellbeing and societal change.

5.3.3 Political Responsibilities: A Fading Focus

This section illustrates how citizens' political responsibilities have been explicitly deemphasized in Ghana and Wales and remain generally absent in the Singaporean CEC examined.

In Ghana, a political focus also appears to be shrinking, though their CEC did explicitly link citizens' responsibilities to politics and democracy in 2007. In *Citizenship Education* (CRDD, 2007a) it was clearly stated, that the "Citizens' responsibilities which promote nation building include...participation in decision making", considered a proxy for political participation. More directly, that "voting in an election" (CPDD, 2007:24) was a citizen's responsibility, which is unambiguous, narrow, but unmistakably a political responsibility. The list of citizens' responsibilities, repeated in full below, is enlightening when we consider political participation, as there are two relevant entries, highlighted in *italic*, whose combined logic implies an expectation of participation beyond the narrow conception of voting:

Citizens' responsibilities which promote nation building include:

- payment of taxes
- protection of public property
- *participation in decision making*
- performing national service
- participation in communal labour
- *voting in an election, etc* (CPDD, 2007:24)

This is an interesting list, as it separately identifies "voting in an election" and "participation in decision-making", suggesting wider notions of participation underpinned the conception of citizenship at the time. In fact, voting was mentioned a significant eight times:

Democracy and autocracy are different ways of ruling people. In democratic governance, the people select their own leaders. The people can also change the leaders through voting, if they do not want them again. (CRDD, 2007:27)

Individuals can promote democracy by: • voting during elections • expressing their views on issues • obeying the laws • respecting the views of others. (CRDD, 2007:27)

And in the definition of syllabus organising theme (1/3) Authority:

Pupils to understand what authority and power are and how to respect authority, acquire skills and knowledge for voting people into positions of authority. They also will be able to examine sources of authority and analyse the costs and benefits of authority. (CRDD, 2007:ii)

Despite the message of broad participation in democracy, the conception of democracy itself is conveyed as representative, and the repeated messaging around voting, consolidates the notion that citizens' political responsibilities were narrowly conceived.

Another section of the 2007 syllabus that addressed citizens' responsibilities, but in the form of "good citizenship behaviours" occurred in a section addressing nation building, and included forms of political engagement, via the proxy of familial and school based decision-making processes, with the explicit, yet narrow example offered as "voting during school elections" (CRDD, 2007:24). Finally, this earlier 2007 syllabus contained the following message directly to the syllabus user:

NOTE: Teacher stresses the need for all eligible voters to vote during elections. (CRDD, 2007:24)

The syllabus further confirms that citizens responsibilities, in other words their obligations, are spelled out in the national constitution.

The Constitution of Ghana consists of laws and various guidelines for governing our nation. E.g. The Constitution identifies the arms of Government (the Judiciary,

Executive and the Legislature). It also spells out the rights and obligations of the people. (CRDD, 2007:16)

This, the most strongly oriented of all the Ghanaian CEC studied in terms of fostering political responsibility, also clearly stated, “It is the responsibility of every Ghanaian to respect, protect and defend the Constitution”. before adding curiously “Any citizen who finds any mistake with the Constitution can suggest a change” (CRDD, 2007:16). This seemingly odd example, that on the surface suggests citizens can really participate in developing democracy, in another reading, reflects a restrictive engagement, where citizen contributions are only required to identify mistakes, not challenge fundamental principles. Nevertheless, the syllabus presents politics, democracy, and citizens responsibilities to them, strongly, but crucially in a way, which would not be maintained in later versions.

Collectively, these references to decision-making, participation, voting, and to a lesser degree, the constitution, highlight *Citizenship Education* (CRDD, 2007a), as the most GPD aligned curriculum in the study, where GPD stands for government, politics, and democracy. However, *Our World Our People* (NCCA, 2019), *Citizenship Education*’s replacement, had no such focus, and even the phrases “rights and obligations” and “constitution” were decoupled.

This is an appropriate point to address the challenges that have arisen regarding the separating out of political participation and political responsibilities. There is a substantial degree of overlap between them, and both are addressed here, and the next chapter, which holds as its focus the citizenship dimension of participation. The essential difference being that this chapter has addressed political participation, where and when it has been presented as responsibility, whereas Chapter Six presents a much more detailed examination of the concept, and how it has featured in the countries CEC.

Key point aside, and back to Ghana’s CEC, the analysis showed a similar fading focus on political responsibility in Ghana’s core provision. In 2007, a third of the syllabus was dedicated to “Governance, Politics and Stability”, and contained many references to citizens’ responsibilities under the constitution.

The constitution is the highest law of the land. It is the constitution that spells out the rights and responsibilities of the individual as well as how the country should be governed. (CRDD, 2007:20)

Our responsibilities include: - defending the 1992 constitution of Ghana (CRDD, 2007:20)

Obligations are the duties and responsibilities of the individual under the Constitution (CRDD, 2007:20)

Independence and self-government imposes certain rights and responsibilities on citizens of the country (CRDD, 2007:8)

These examples give little away but stress the point that citizens' responsibilities are "enshrined" in the constitution. Despite the regular references to constitutional responsibilities, and the separations of powers (CRDD, 2007:20), content that could enable a degree of political literacy (see below), and despite a third of the syllabus focussing on "Governance, Politics, and Stability", there are no explicit messages about citizens political responsibilities, only an implicit instruction to protect the constitution:

A constitution is a set of rules for governing a country. A constitution may be written e.g. the 1992 constitution of Ghana or unwritten (as in Britain).

The three main organs of government are the Legislature, the Judiciary, and the Executive

Separation of Powers; it is a concept that means that the three organs of government (Legislature, Judiciary, and the Executive) are expected to work independently of each other.

Separation of powers however operates with the concept of Checks and Balances (CRDD, 2007:20)

Again, however, in subsequent iterations of Social Studies in 2020 and 2024, such examples are generally omitted, and the third of the syllabus that was dedicated to Governance, Politics, and Stability, was removed in 2020, with the content it once held, re-assigned to the strand (or theme) “Law and Order”, essentially demoting the importance of politics, governance, and stability, and with it the citizens’ political responsibilities. Where a focus on the political responsibilities of citizens has been scaled back in Ghana, it barely presented at all in Singapore, apart from in the earliest of their syllabi included in the analysis, *Civics and Moral Education* (CPDD, 2007). In fact, across all ten Singaporean syllabi analysed, the terms *politics* and political, appeared only 15 times, typically listed without elaboration, and, as illustrated in the example below, repeated in four versions of the country’s social studies syllabus, is not specifically responsibility linked.

...students will draw on the disciplines of the humanities and social sciences, including History, Geography, Political Science, Sociology and Economics (CPDD, 2014:8, 2020:10, 2023:8, and 2024:11)

Of the fifteen mentions of politic*, none explicitly link to citizens’ responsibilities. Even the repeated instruction quoted above, is a responsibility of the student, not the citizen. Another mention of political addressed the “political challenges faced by people in post-war Singapore” (CPDD, 2024:32) but notably not those faced by contemporary Singaporeans, restricting consideration of political concepts to the historical domain, instead of presenting politics a contemporary citizens’ responsibility. Three more mentions were found in the syllabus bibliography, suggesting an overall lack of importance.

The de-emphasis of a political focus in the Singaporean CEC has been accompanied by the regular inclusion of the *Desired Outcomes of Education* (DOE) since 1997, which are frequently cited in their syllabi. One of these, repeated in three social studies syllabi, is particularly revealing, if we examine the latent content. The outcome reads:

As informed citizens, students will understand the rights and responsibilities of citizens and the role of the government in society (CPDD, 2020:5, 2023:3, 2024:6)

By grammatically separating the clauses “the rights and responsibilities of citizens” and “role of the government in society” either side of a coordinating conjunction, we can infer that

citizens' responsibilities and the government should also be separate, an implication of which would be that the citizens are not expected to engage with the domain of politics, otherwise known as the operating of democracy or government policymaking. In this reading, the government's role and the citizens responsibilities are non-overlapping entities, aligned maybe, but separate, nonetheless.

No references to political responsibilities or political responsibility were explicitly made in the Singaporean CEC studied. This absence, coupled with the lack of references to politics generally, suggests shaping politically minded and politically responsible citizens has not been a priority.

In Wales, as in Ghana, the argument can be made that fostering citizens' political responsibilities was once a relatively important feature of their CEC, but is less so now. For example, in *Community Understanding* (CCW, 1991), it was stated that pupils should know their "political rights" (1991:7). Reflecting the goal of raising political participation, albeit via discourses of decision-making, which the chapter will return to in more detail in section (5.3.6), the syllabus could be described as seeking to foster a participatory form of democracy.

Participation in Decision-Making Power and authority and therefore decision-making, operate at a number of levels: the family, the classroom, the school, local government, national government and internationally through such agencies as the United Nations. Pupils need to examine how these processes work and be aware of the part they can play as individuals. Wales is part of the community of democratic nations, therefore pupils should understand what democracy means in practice and how a democratic political system works. They will need to acquire the knowledge and skills that will permit them to participate fully in decision-making processes. Pupils should know about the various political parties, their differences and similarities. They should understand how communities can be influenced by means of pressure groups, interest groups, trades unions and professional associations. (CCW, 1991:8)

What is particularly interesting, is that the political participation of the pupil-citizen was referenced three times in this short description, indicating early efforts to cultivate political

forms of participation, beyond just voting. In later syllabi, namely *PSE* (WAG, 2008) it was stated,

The school ethos, enshrined in democratically agreed rules, can provide a stable and ordered environment in which values such as respect, honesty, fairness, and responsibility can be promoted (WAG, 2008:13)

Whilst this may not reflect attempts to improve political literacy via conventional means, didactic delivery of content - as was the preferred mode in Ghana at the same time, it does speak to an experiential form of political literacy, but in a more active and experiential manner, that itself reflects supranational influences such as the Rights of the Child policy, and in particular the right to be part of decisions affecting them. Agreeing rules, is such an example.

The same year, in the country's extended provision, *ESDGC* (2008a) omitted any such focus. However, a year later, *Wales Europe and the World* (WAG, 2009) did a lot to catalyse political education generally, with a quarter of the syllabus dedicated to the "political element" of citizenship, and a focus laid on citizens' political responsibilities, and it was stated, "political responsibility is linked to personal responsibility" (WAG, 2009:21). This particular sentence appears to intentionally conflate the two, and draws emphasis on the individual as opposed to the kinds of collective responsibility, Singapore continues to seek to foster for example.

The final of the syllabi in Wales's core provision, was *Unity and Diversity* (WAG, 2010), which included the aim, for students to:

develop an awareness of human rights, and the skills of participation and responsible action – for example, engaging learners (via the school council) in defining racism and identifying actions to stop it. (WAG, 2010:22)

Whilst not explicitly political, the phrase "the skills of participation and responsible action" accompanied by the example of a school council, can be reasonably interpreted as an attempt to shape politically responsible citizens.

Wales's most recent syllabus, *Humanities AOLE* (WG, 2019) heavily referenced the terms, social (86) political (37) cultural (59) religious (127) economic (38) and environmental (99), invariably in list format, with little explanation or detail, and thus limited ability to interpret the meanings behind mentions, and ultimately the intentions for shaping politically responsible citizens by governments. Examples include:

Societies are characterised by a range of cultural, economic, legal, and political norms and values. (WG, 2019:8)

...justify their decisions when acting socially, politically, economically, and entrepreneurially. (WG, 2019:8)

...explore rights and their history and the social, psychological, spiritual, religious, political, legal, historic, ethical, and cultural dimensions that influence sexuality over a lifespan. (WG, 2019:15)

...know political, economic, business ideologies and perspectives (WG, 2019:45)

This approach is so prevalent in Wales's current CEC, that only rarely could any context and meaning be deduced. Unlike several of the other syllabi in the analysis, there were no themes, or sections dedicated to this topic, which could therefore be analysed in an effective qualitative way. It must be acknowledged however, that this was not a specific challenge for investigating citizens' political responsibilities, it was a broader problem, where many issues were addressed, simply by telling pupils they need to consider a range of political, economic, social, technological, legal, and ethical/environmental, among other factors, in doing so. This is perhaps understandable for a holistic curriculum, that by adopting a model coproduction must theoretically permit almost any content.

One such example, states:

Learners need to know political, economic, business ideologies and perspectives (WG, 2019:45)

This broad instruction permits a wide range of possible content, but does not provide any rich material for interpretation. Essentially, it is extremely difficult to interpret what the citizen's political responsibilities are meant to be in *Humanities AOLE* (WG, 2019), given they are never stated. A similar problem appears in the syllabus's treatment of responsibilities in general, rarely defining or contextualising them. Although it states that learners should have "...opportunities to become responsible citizens..." (WG, 2019:8), it provides no clarification about what specific responsibilities this should involve. General descriptions of the contexts (social, political, cultural, economic etc) in which these responsibilities are to be held, are provided, where for example, pupils are encouraged to exercise "their democratic rights and responsibilities" (WG, 2019:8), but little depth, details or insight is available as to what these should be. In a sense this constitutes, maybe not a reduction in emphasis on developing political responsibilities, but certainly a withdrawal of detail regarding citizens' political responsibilities, as it the case with their responsibilities more broadly.

This perspective is offset by the "what matters statement" which envisioned "informed, self-aware citizens..." who are "able to consider the impact of their actions when making choices and exercising their democratic rights and responsibilities" (WG, 2019:8 and 70), and are urged to,

...utilise their social and political literacy to build a conscious understanding of their own role and their responsibilities towards others and towards the environment (WG, 2019:91)

This example again shows an understanding of citizens' political responsibilities, even directing them to the domains of society and environment, but again do not provide any explanation of what they should be. Collectively, developments in Wales and Ghana indicate a de-prioritisation of this element of citizenship, converging with Singapore's position, where political responsibilities of citizens receive little attention.

5.3.4 Emergent Themes: Familial Rights and Responsibilities

Familial responsibilities are considered by some to be a private matter, to others they reside in the public sphere. Liberalism generally perceives the family to be a private interest, and

therefore citizenship education, in such societies is unlikely to seek to foster any familial responsibilities, nor carry any family related content more generally. By contrast, civic republicans, in the classical formation at least, hold traditional views of patriarchal family units. In the modern interpretation, more flexibility exists regarding non-standard family structures, but in both, the state can become involved, and seek for example, to design curricula which addresses familial responsibilities as part of efforts to shape future citizens. Similarly, communitarians generally view the family as the fundamental unit of society, where one's core identity is derived, not as in liberalism, only through the individual, and so are also likely to address familial responsibilities.

With regard to the family then, a clear divergence was delineated, between on the one hand Wales, who barely referenced family and included no direct references to familial responsibilities at all, and Ghana and Singapore on the other, who included a significant focus on family, including explicit references to familial responsibilities.

There are twenty-eight references to family in Ghana's *Citizenship Education* (CRDD, 2007a), the vast majority of which occurred in a unit entitled 'Domestic Violence and Conflict in the Family', essentially training students to be able to identify and deal with such conflicts. This was typical of the syllabus's strategy of problematising issues. In *Our World Our People* (NCCA, 2019), the subject's replacement, the "right to family" was included as one of three exemplars of rights, along with the "right to life" and the "right to protection" (NCCA, 2019:13). The syllabus goes on to list the "Fundamental human rights as a family member" as being the,

- Right to live with family
- Right to guardianship
- Right to education
- Right to health
- Right to belong to a family
- Right to education (2019:13)

Furthermore, the syllabus instructed "Learners [to] compose songs and rhymes on the right to belong to a family" (2019:34). What all this focus represents is an emerging concern in the

Ghanaian curriculum with familial rights, a concern that simply did not exist previously, outside of the notion of familial conflict.

Although family had featured in Ghana's *Social Studies* and was highlighted in the 2020 syllabus through an entire strand titled "Family Life" and the aim to "exhibit a sense of belonging to the family" (2020: xviii), the focus remained largely descriptive. It centred on understanding Ghanaian family structures, comparing them with those of other nations, and outlining how learners could be good family members. Explicit discussion of *familial rights* did not appear until the introduction of *Our World Our People* (NCCA, 2019).

Ghana's CEC uniquely highlights familial rights, while Singapore and Wales's do not, with Singapore only addressing family responsibilities indirectly via the inculcation of related core values. Ghana's core provision, saw a significant transition take place, from five unrelated references to family in 2005 to a whole dedicated section in 2020, where six of the twenty-three references to citizens responsibilities were to family, meaning over a quarter of all references to citizens' responsibilities in this syllabus were familial. This familial focus carried into 2024's syllabus, where a substantial focus on family responsibilities was nested in authority and power, describing a responsible family member as obedient and respectful. This furthers the argument that Ghana is increasingly seeking obedient and well-behaved citizens, be it in the home, school, or wider community. The concept of family was also found extensively in Ghana's *Citizenship Education* (CRDD, 2007a) and its replacement *Our World Our People* (NCCA, 2019). More illuminating was the associated shift in focus from conflict in the family in 2007, to family as authority in 2019.

In Wales, *Personal and Social Education* (WAG, 2008) was the first of the interventions studied to include any significant focus on family, where related citizens' responsibilities were brought up:

the role of marriage, the importance of stable family relationships and the responsibilities of parents (2008:21a)

Beyond this, no familial focus was identified, and even this is a tenuous link at best.

In Singapore, no familial responsibilities presented in *Social Studies* (CPDD, 2005 and 2014), after which however, the desired outcomes of education, which seek to shape concerned citizens, took on an addition. Conspicuously, the word family was added so that from 2020, it read,

a *concerned citizen* who is rooted to Singapore, has a strong civic consciousness, are responsible to their family, community and nation and take active roles in improving the lives of others. (2020:3, 2023:6, and 2024:6)

This is significant and reflects a growing push to bring the family back into conceptions of citizenship in Singapore. By contrast however, Singapore's extended provision contained many references to familial responsibilities, with the DOE "a concerned citizen who is rooted to Singapore, has a strong civic consciousness, are responsible to their family..." made explicit.

5.3.5 Emergent Themes: Responsible Online Citizenship

One trend of globalisation is the increasing reach of technology and in particular the rise of digital and social media technologies. In alignment with these developments, being responsible online has emerged as a theme in all three countries over the course of the study period.

In Singapore, a focus on being responsible online grew in the country's core and extended provisions. Responsible ICT use also grew in focus in Singapore's core provision, where in 2020, a core value was "...the importance of civic responsibility in public and online space" (CPDD, 2020:35). In Singapore's extended provision, three mentions of internet use that essentially amount to advice to be responsible online presented as early as *Civics and Moral Education* (CPDD, 2007:12, 16and22). In its replacement, *Character, and Citizenship Education* (CPDD, 2014) this focus was crystalised as a core competency (one of seven), that included:

Education and Career Guidance (ECG)
Sexuality Education (SEd)
Cyber Wellness (CW)

Information and Communication Technologies (ICT)

In Singapore’s most recent syllabus, in their extended provision, *Character and Citizenship Education* (NaCCA, 2021) the phrase “cyber wellness” appears fourteen times and is defined as,

Cyber Wellness (CW): are becoming increasingly pervasive in our world. While creating instant connectivity and access to vast repositories of information, knowledge, and opinions, the open nature of the Internet can expose our students to undesirable content and influences. CW in CCE is important as it focuses on the well-being of our students as they navigate cyberspace, equipping them with the knowledge and skills to harness the power of ICT for positive purposes, maintain a positive presence in cyberspace, and be safe and responsible users of ICT. (2021:13)

Originally in Ghana, the internet was only included as a pedagogy “IF available”, with three examples of where it says exactly that in *Social Studies* (CRDD, 2007). However, by *Social Studies* (NaCCA, 2024) the “internet” was included without this caveat. Additionally, since *Social Studies* (NaCCA, 2020) “Digital Literacy” became a core competency, which it was stated, involved:

... guiding learners to discover, acquire skills in and communicate through ICT to support their learning and make use of digital media responsibly (NaCCA, 2020:xxviii)

and where pupils were to be taught to “recognise and avoid traps in cyber space” and “Understand the sociological and emotional aspects of cyberspace” (NaCCA, 2020:118). The same core competency and definition were retained in 2024’s *Social Studies*, where pupils were urged to “...responsibly use digital media.” (NaCCA, 2024:xxvi). A consistent approach was presented in *Character and Citizenship Education* (SDCD, 2021:vi) which also includes the same definition and core competency.

Ghana’s *Social Studies* (CRDD, 2007), written for an audience who didn’t necessarily have the internet “NOTE If the Internet is available in the community, help pupils to use it to see how people in other countries are solving the problem of environmental degradation”

(CRDD, 2007:2) and “Read on technologies in agriculture from the internet if available.” (CRDD, 2007:28). Responsible use of ICT, digital media, internet, cyber, online have proliferated in Wales since 2008, In *PSE* (WAG, 2008) for example, pupils are instructed to “use ICT safely responsibly and independently, embedding appropriate behaviours and techniques into activities to ensure they remain both safe and legal at all times” (2008:25a).

5.3.6 Emergent Themes: Responsible Decision-Making

Emphasis on responsible decision making has almost universally grown. Closely related to political responsibilities, and an emergent theme in all three countries, though only addressed as a communal activity in the Singaporean CEC, was a focus on responsible decision-making, which was predominantly presented as an individualised activity. As a skill that will be needed increasingly, particularly in discerning between information and misinformation, in an unpredictable global era, decision-making has transitioned from peripheral, and rarely mentioned, to becoming a key feature in all three countries.

In Ghana’s 2007 *Social Studies* (CRDD, 2007:xiii) there was no focus on decision making. However, by the syllabus’s 2020 revision, decision making had become well integrated, demonstrable in part by the core competency “preparedness to make a better decision using available information”, repeated six times throughout the syllabus. Also, of the eleven mentions of “decision” overall in the syllabus, one occurs importantly in the general syllabus aim, where it is written ‘Social Studies aims to produce reflective, concerned and competent citizens, who will make informed decisions for individual and public good’ (2020:xiii). In fact, the very definition of responsibility in the syllabus, centres the notion of decision-making ‘Responsibility: the ability to act independently and make decisions; be morally accountable for one’s action and be capable of rational conduct’ (2020:xvi). Furthermore, under *Strand Three: Sense of Purpose*, there is the rather enlightening reference to collective decision-making, when pupils are asked to “explain the factors to be considered in community decision-making process, including investigating, developing and evaluating alternatives” (2020:56) which implies underlying communitarian or civic republican influences. All of which, was maintained in 2024’s version of the syllabus.

Decision-making was also the focus of pedagogical suggestions and definitions of responsibility in Ghana's *Citizenship Education* (CRDD, 2007a:iii&vi), but beyond occupying a core competency in 2019's syllabus replacement, there was little to suggest it was a major focus, contrasting strongly with the country's core provision (Social Studies).

In Singapore, decision-making has been a central and pervasive feature of the country's CEC and is so extensively embedded across the curriculum that it cannot be comprehensively listed here. What follows, therefore, is the formal definition of responsible decision-making provided in *Citizenship Education* (CRDD, 2007a):

Responsible decision-making is essential for personal and social wellbeing. It involves critical thinking skills that enable individuals to make informed and responsible decisions, and to evaluate these decisions according to personal, social, moral, and ethical considerations. It also requires translating decisions into action, and having the courage and conviction to stand by them (CRDD, 2007a: 8)

In Wales, too, decision-making, particularly since 2008, has been a significant curricular focus. As in Singapore, references are too numerous to cite exhaustively, but illustrative examples include expectations that learners become "well-organised and take responsibility for their actions and decisions..." (WAG, 2008:23b). Learners are also encouraged to think analytically and globally about decision-making processes:

Learners acquire the skills, knowledge and understanding that enable them to compare decision-making within their communities and at local, national, and global levels, thereby supporting participation in world issues as global citizens (WAG, 2008: 23b).

However, this clear and sustained emphasis on decision-making has not been maintained within the country's most recent syllabi. Collectively however, this aspect of citizenship has become an increasingly important focus across the countries.

5.4 Citizens Responsibilities: Changing Scales

In all three study countries, citizens' responsibilities have been framed very differently by scale and context. In Ghana, responsibilities are consistently legally framed, anchored in constitutional authority and obedience, reflecting concerns with national stability. In Singapore, responsibilities are primarily morally framed, emphasising emotional commitment, collective responsibility, and nation-building. In Wales, responsibilities are not strongly nationalised, they appear rarely at the national scale and are more often framed locally or globally, with little explicit emphasis on duties to the nation. The next three sections (5.4.1-5.4.3) address community-based, national, and global responsibilities, respectively

5.4.1 Community-based Responsibilities (Localism)

All three study countries included community-based strategies, most notably through project work and service learning, but the emphasis and visibility differ markedly. In Ghana, community responsibilities were strongly emphasised in earlier iterations of *Citizenship Education* (CRDD, 2007a) which included dedicated units on community responsibility. Community projects later became embedded structurally, with “community projects and community service...integrated into the CCP as part of a comprehensive assessment programme” (NaCCA, 2020:iii). However, this communitarian framing largely disappears in later syllabi such as *Our World Our People* (NCCA, 2019) and subsequent *Social Studies* curricula (NaCCA, 2020; 2024), where only isolated references remain.

Singapore likewise embeds responsibility through structured programmes such as the *Community Involvement Programme* (CIP), designed to “develop character, competence and commitment as responsible citizens and future leaders” and “nurture the spirit of volunteerism” (CPDD, 2007:9). However, community responsibility is less frequently framed at a local scale. Instead, responsibilities are situated in school, home, and work settings rather than geographically defined communities (CPDD, 2007), though these are recognisable communities through a communitarian lens. References to community responsibility ultimately declined over time, disappearing entirely from 2021's *Character and Citizenship Education* (NaCCA, 2021)

In contrast, Wales consistently foregrounds local belonging and community participation. Most recently, their *Humanities AOLE* (WG, 2019) syllabus refers explicitly to “roles and responsibilities within the various communities to which I belong” (WG, 2019:60), and the term *local* appears frequently. This reflects a communitarian but non-national orientation, where responsibility is rooted in place without strong linkage to the Welsh nation-state.

5.4.2 Citizens’ Responsibilities to the Nation (Particularism)

Nationally framed responsibilities constitute the starkest point of divergence among the study countries. In Wales, only one explicit national reference was identified, learners should “understand their responsibilities as young citizens in Wales” (WAG, 2008:20). Even this solitary direct reference refers to citizens *in* Wales rather than citizens *of* Wales, reinforcing the weak national anchoring of responsibilities. While Welsh identity is promoted indirectly, through language, culture, and the concept of *Cynefin*, responsibility itself, was generally not framed as a national duty. However, many examples of indirect nationally focussed citizens responsibilities were found in the Welsh syllabi. The clearest example of this was the promotion and mandating of the Welsh language, specifically in *Wales, Europe, and the World* (WAG, 2009:14), which addressed Wales’s statutory requirement for pupils to learn Welsh.

By contrast, Ghanaian CEC has been consistently and explicitly national. Responsibilities are repeatedly described as constitutional obligations, as in “defending the 1992 constitution” and “paying taxes” (CRDD, 2007:8), but later expanded to “protect[ing] public property”, “respecting national symbols” and again “paying taxes” (NaCCA, 2020:20 and 60; NaCCA, 2024:36). Learners are told unambiguously that “it is the constitution that spells out the rights and responsibilities of the individual” and that citizens should acquaint themselves with it (CRDD, 2007:8). Ghana’s extended provision adds voting, national service, communal labour, and patriotism (CPDD, 2007, NCCA, 2019) to the list of responsibilities a citizen should have. Overall, Ghanaian CEC repeatedly invokes nation-building “under the constitution” (CPDD, 2007:32) as the agenda to which citizens should ultimately be responsible. Singapore also nationalises responsibility, but in a moral rather than legal manner. Learners were encouraged to “stay rooted to Singapore” (CPDD, 2007:7) and to “demonstrate a sense of pride, loyalty and commitment to Singapore” (CPDD, 2005:2).

Furthermore, *National Education* (NE) and the “Head, Heart, Hands” framework aimed at “developing their emotional bonds to Singapore” (CPDD, 2016:4). Even responsible decision-making, addressed in the previous section, was explicitly contextualised within “Singapore’s unique contexts, constraints, and vulnerabilities” (CPDD, 2023:13-19). The curriculum even anthropomorphises the nation, asking: “How would we demonstrate our commitment to the well-being of Singapore?” (SDCD, 2014).

Importantly, these differences should not be seen as a simple developmental hierarchy in which moral framing is inherently “more advanced” than legal framing. Rather, the evidence suggests contextual variation. Ghana’s constitutional emphasis reflects postcolonial state-building and stability concerns, while Singapore’s moral orientation draws on collectivist, Confucian, Daoist, and Buddhist traditions and long-standing nation-building strategies. Each framing responds to distinct historical, political, and cultural conditions rather than representing linear progression.

5.4.3 Global Citizenship Responsibilities (Universalism)

Whilst all three countries addressed the environment as a responsibility of the citizen regularly, inherently a globalised concern, explicit statements that assign global responsibilities to the citizen were rare. However, over time, all three countries introduced the notion of global responsibility, though unevenly. Ghanaian CEC did not reference global responsibilities at all. Wales, by contrast, demonstrated a different approach from 2008 onward. *PSE* required learners to “actively demonstrate personal responsibility as a global citizen” (WAG, 2008:25), reinforced through *ESDGC* (WAG, 2008a) and references to international charters such as the Rights of the Child and human rights conventions (WAG, 2008b; 2009; 2010). Most recently, the *Humanities AOLE* (WG, 2019:72-73) consistently framed responsibility across “local community, Wales and the wider world”.

5.4.4 Multilayered Citizenship Responsibilities

Finally, applying Yuval-Davies’s (1997:4) concept of citizenship as “multilayered”, evidence of simultaneously articulated local, national, and global responsibilities is limited but emerging.

Ghana does not articulate this multilayered conception, but Singapore includes the idea explicitly, defining the responsible citizen as one who recognises duties “to himself, his family, community, nation, and the world” (CPDD, 2007:7 and 21). Wales shows the clearest institutionalisation of this idea, particularly in *PSE* (WAG, 2008) and *Humanities AOLE* (WG, 2019), which empower learners to act “locally, nationally, and globally” (WAG, 2008:4, WG, 2019:73). While often presented as lists rather than fully theorised constructs, these formulations nonetheless indicate growing curricular awareness of responsibility as simultaneously multilayered, aligning with cosmopolitan and communitarian thinking.

In conclusion, comparative analysis shows that citizens’ responsibilities are scaled and prioritised very differently across the three contexts, Ghana emphasises constitutionally grounded national obligations, Singapore moralises responsibility through emotionally embedded nation-building while selectively engaging local and global scales, and Wales largely sidesteps national particularism in favour of local and global framings, with only emergent, and uneven, recognition of citizenship as a multilayered construct spanning community, nation, and world.

5.5 Citizens’ Rights as Human Rights

5.5.1 Introduction

This section examines how CEC frame the concept of human rights, revealing underlying assumptions of universalism in citizenship. By comparing the inclusion, frequency, and curricular positioning of human rights across the countries CEC, it highlights fundamentally different understandings of whether rights derive from human status or state authority.

5.5.2 Inclusion and Framing of Human Rights

Human rights are commonly defined as universal and inalienable. As the *Equality and Human Rights Commission* states, they are “the basic rights and freedoms that belong to every person in the world, from birth until death” (EHRC, 2023). Their inclusion in citizenship curricula therefore signals an assumption that rights derive from human status rather than national membership.

Across the data, one of the clearest divisions between the countries concerned the presence or absence of the phrase, human rights. Ghana and Wales both included the phrase consistently and increasingly, while Singapore omitted it entirely from all analysed syllabi. This divergence is striking and suggests fundamentally different conceptions of citizenship rights. Quantitatively, the prominence of human rights within rights discourse increased over time in both Ghana and Wales. In Ghana’s core provision, references to rights prefixed with the word ‘human’ rose from 41% in 2007 to 42% in 2020, to 55% in 2024. In their extended provision, the proportion rose from 29% (2007) to 52% (2019). Wales exhibited a similar, though less linear, pattern, with their core provision, increasing from 24% (2008) to 51% (2010), before settling at 31% in their most recent syllabus *Humanities AOLE* (WG, 2019), where human rights still account for approximately a third of all references to rights. By contrast, the phrase “human rights” does not appear at all in the Singaporean CEC analysed. Rights, when mentioned, were framed narrowly as constitutional liberties guaranteed by the state, rather than as universal entitlements.

In Ghana, the growing salience of human rights is further evidenced by deliberate wording changes. Between 2020 and 2024, iterations of *Social Studies* (NaCCA, 2020 and 2024) saw the recurring phrase “rights and responsibilities” systematically replaced with “human rights and responsibilities”. While the earlier versions used the unqualified phrase five times (2007) and four times (2020), the 2024 syllabus repeats the reworded formulation eight times. This shift suggests an explicit attempt to universalise the language of citizenship rights.

However, this growing rhetorical emphasis coexists with structural downgrading. In both Ghana’s core and extended provisions, human rights have been demoted from full units to sub-strands. For example, “Unit 1: Basic Rights of Human Beings” in *Citizenship Education* (CRDD, 2007a) became a sub-strand entitled “Basic Human Rights” in *Our World Our People* (NCCA, 2019). Similarly, “UNIT 4: Citizenship and Human Rights” in *Social Studies* (CRDD, 2007) was reduced to a sub-strand in the 2020 and 2024 revisions. This tension suggests that while the *language* of human rights has expanded, their curricular *centrality* has diminished.

In Wales, human rights have been integrated more consistently into their CEC. *Community Understanding* (CCW, 1991) positioned human rights as a core organising theme, and *Unity and Diversity* (WAG, 2010) embedded them as a curriculum rationale, syllabus aim, and

analytical lens. More recently, in the *Humanities AOLE* (WG, 2019), learners are explicitly required to understand:

- the distinction between wants, needs, and rights.
- that children have human rights codified in the UNCRC.
- challenges to human rights at local, national, and global scales
- the roles of governments and NGOs in protecting or denying rights.

(WG, 2019:78-79)

Achievement outcomes further require students to explain and evaluate contemporary human rights issues and movements in Wales and the wider world (WG, 2019:73). In Wales, then, human rights are not merely referenced but integrated into progression frameworks and assessment expectations. Overall, while both Ghana and Wales demonstrate increasing reference to human rights, Wales embeds them more deeply and coherently, whereas Ghana's curriculum reveals unresolved tensions between universalist language and national control. Singapore, by contrast, omits human rights entirely.

Ultimately, children possess human rights under the UDHR (1948) but receive additional protection through under the UNCRC (1989). The inclusion of the UNCRC within CEC therefore signals recognition of supranational authority and a commitment to child-centred citizenship. The next section addresses presents a brief analysis of the inclusion and framing of the UNCRC and child's rights in the countries' CEC.

5.5.3 Inclusion and Framing of the Rights of the Child

Ghana's engagement with children's rights has been limited and inconsistent. *Citizenship Education* (CRDD, 2007a:17) instructed teachers to "emphasise the rights of the child", but made no reference to the UNCRC or its articles. Subsequent curricula introduced learning indicators relating to children's rights, but consistently framed them through the 1992 Constitution, rather than addressing the international conventions. This suggests a preference for national sovereignty over UN authority. Only in the 2024 curriculum are learners instructed to "search and discuss the United Nations Declaration on Human Rights" (CPDD, 2024:54), indicating a tentative adoption of at least a partial international engagement.

Wales, by contrast, has progressively embedded the UNCRC since 2008. The *Humanities AOLE* (WG, 2019) includes eleven references to the UNCRC, a dedicated section on Human Rights Education, and hyperlinks to UN resources. The current Welsh curriculum is explicitly rights-based and arguably most closely aligned with a child-rights education model among the three cases.

Singapore on the other hand represents a clear departure from a rights perspective. While earlier curricula such as *Civics and Moral Education* (CPDD, 2007) included limited rights-oriented aims, more recent syllabi, particularly *Character and Citizenship Education* (SDCD, 2021), omit references to human rights, the UDHR, or the UNCRC altogether. Instead, they privilege family values, character development, and social harmony, seemingly marking a deliberate retreat from global rights frameworks, including the UNCRC. Consequently, human and child's rights are two areas where the three countries diverge. This was also true of justice and the law more broadly, as the next section explains.

5.5.4 Rights, Responsibilities, Justice, and the Law

A further distinction lies in how rights are positioned in relation to law, justice, and responsibility. In Ghana, rights are frequently embedded within discourses of obedience, respect, and lawfulness, whereas Welsh CEC tend to frame rights as tools for social justice and civic action, broadly aligning with Westheimer and Khane's (2004) responsible and social-justice oriented citizens, respectively.

In Ghana, successive curriculum revisions have progressively relocated human rights into strands focused on law and order. For example, in *Social Studies* (NaCCA, 2020 and 2024), "Citizenship and Human Rights" is now positioned within "Law and Order in the Ghanaian Society", implying that rights are primarily about compliance and social stability. Similarly, in *Citizenship Education* (CRDD, 2007a), human rights were predominantly discussed in the context of abuses, reinforcing a defensive rather than emancipatory framing. In their extended provision, another transition can be discerned. *Our World Our People* (NCCA, 2019) places "Basic Human Rights" within the strand "Our Beliefs and Values", alongside an expanded focus on religion. References to the "three main religions" appear repeatedly, an approach that risks exclusion while also signalling a transfer of moral authority from constitutional to

religious frameworks. This repositioning suggests that the ideal Ghanaian citizen is increasingly constructed as religious and obedient, rather than rights-bearing and politically empowered.

Welsh curricula present a contrasting orientation. In *Humanities AOLE* (WG, 2019), law and justice are explicitly connected to social action, where learners are expected to develop “a commitment to social justice and social action, within Wales and the wider world” (WG, 2019:15). Justice is framed as something to be evaluated, contested, and pursued collectively, rather than merely obeyed. Rights, in this context, function as instruments for participation and critique. In addition to these divergent and fundamentally different perspectives underpinning the countries conceptions of citizens’ rights, changes have also occurred regarding the scales at which the CEC portray rights as given, held, and protected. This is discussed in the next section.

5.6 Citizens’ Rights: Changing Scales

5.6.1 Introduction

A longstanding debate in citizenship theory concerns whether rights are universal, held by all humans and protected supranationally, or whether they are particularistic, deriving from national and local contexts. Globalisation has intensified this debate, with some scholars arguing it challenges the notion of nation as rights giver and protector. Soysal, (1994:136) for example argues that the emergence and consolidation of supranational institutions of rights, such as the UN and UNICEF, premised on a universal notion of all humans as equal, evidences just such a transition. Others emphasise national resilience (Green, 1997). As shown in Section 5.6, Ghana and Wales increasingly reference human rights, while Singapore does not. This section therefore focuses more narrowly on how curricula locate rights spatially, at local, national, or global scales, and how these scales interact.

5.6.2 Community-based Rights (Localism)

Community level rights, or local rights, appeared infrequently across CEC studied, but Ghana provided the clearest examples. Several syllabi encouraged community projects on citizens' or human rights (CRDD, 2007; NaCCA, 2020; NaCCA, 2024), and linked rights to conflict prevention within local contexts. These references operationalised rights through community engagement, albeit still framed as universal human rights rather than locally derived entitlements. Comparable references were largely absent in Singapore, while Wales's recent curricula subsume community-level rights within a multilayered human rights framework (see 5.5.5).

5.6.3 Nationally Constituted Rights (Particularism)

National constitutions featured prominently in Ghanaian and, to a lesser extent, Singaporean curricula as sources of rights. Ghana's *Social Studies* (CRDD, 2007:8) repeatedly described rights as "enshrined in the 1992 Constitution", portraying the constitution as both rights-giver and protector. Although later curricula introduced stronger human rights language, rights were still often presented as valid *because* they are constitutionally recognised.

Singapore's *Civics and Moral Education* (CPDD, 2007) similarly attributes justification for rights to the constitution, stating that "Fundamental liberties are individual rights which the Constitution of Singapore guarantees to citizens" (2007:19). In the absence of universalist framing, constitutional authority dominates. Wales stands apart. While the Welsh Government is frequently referenced, it is positioned as implementing or supporting rights derived from international conventions, especially the UDHR and UNCRC. Rights are not presented as nationally gifted, but as universally held.

5.6.4 Globally Aligned Rights (Universalism)

Alignment with universalist notions of human rights, is most evident in Wales, where rights are consistently framed as human rights anchored in international conventions. Ghana also includes substantial human rights content, but often for different purposes, particularly discussing abuses rather than empowerment. Singapore again omits this scale entirely.

5.6.5 Multilayered View of Citizens' Rights

A multilayered conception of rights, operating simultaneously at local, national, and global levels (Yuval-Davies, 1997), presented in Wales's more recently implemented curricula, having not featured in earlier versions, such as *Community Understanding* (CCW, 1991). Even here, however, the rights in question remain universally conceived human rights, only applied across different scales. Neither Ghana nor Singapore displayed comparable multilayered constructions.

Overall, the sections' analysis shows that citizens' rights are positioned at markedly different spatial scales across the three curricula, Ghana, and Singapore largely ground rights in national constitutional authority, while Wales consistently frame them as universal human rights, recently presenting them as operating across interconnected local, national, and global levels. This divergence highlights how curricular conceptions of rights reflect broader tensions between particularism and universalism in contemporary citizenship education.

5.7 Chapter Conclusions

This chapter has shown a clear transition in how CEC in Ghana, Singapore, and Wales have included, omitted, and framed citizens' rights and responsibilities between 1991 and 2024. In all three countries, the most consistent convergence regarding the citizenship dimension rights and responsibilities, was the increasing emphasis placed on citizens' responsibilities, alongside a relative decline, marginalisation, or repositioning of citizens' rights. However, beneath these convergent trends, lay fundamentally different positions on both the nature and scale of rights and responsibilities conceptions in the countries CEC.

Quantitative analysis (TMS, RPP values) revealed that Ghana and Singapore have progressively reduced emphasis on rights, while correspondingly increasing emphasis on responsibilities. Wales generally increased their curricular emphasis on rights, particularly through a human rights lens, but their recent employment of KSMs presents a balance between rights and responsibilities, with both featuring extensively, including in the syllabus aims. However, this conflicts somewhat with the more rights-leaning findings of the TMS and RPP analysis of the Welsh CEC. Across all three contexts, responsibilities have increasingly been embedded in aims, values, and core concepts, signalling a deliberate use of curriculum architecture or key syllabus mechanisms to foreground responsibility.

Additionally, the qualitative analysis showed that responsibilities are not conceived of uniformly. Ghana frames responsibility primarily as constitutional, legal, and behavioural, oriented toward obedience, social order, and nation-building. Singapore moralises responsibility, emphasising collective duty, social harmony, and emotional attachment to the nation, while largely disengaging from rights-based or political discourses. Wales, by contrast, situates responsibility within social justice, community engagement, and global awareness, while displaying relatively weak national particularism. These differences underscore that curricular convergence around “responsibility” masks divergence in meaning, scale, and intent.

The chapter also demonstrated sharp contrasts regarding rights. Wales consistently frames rights universally, as human rights, increasingly operationalised at local, national, and global scales. Ghana exhibits a growing use of human rights language, but it is often in tension with efforts at national control, obedience, and law-and-order framings. Finally, Singapore largely omits human rights altogether, positioning rights narrowly as constitutional liberties, if at all. These patterns reveal fundamental differences in whether citizenship is conceived primarily as a status-bearing, rights-holding condition, aligned with liberal positions, or as a moral and behavioural role within society, which align more with communitarian positions.

Overall, the chapter shows that citizenship education in these postcolonial countries is not simply becoming more “responsibility-focused” across contexts, but is doing so in ways that reflect distinct political histories, cultural traditions, and state priorities. The next chapter addresses the closely related issue of citizen participation.

Chapter Six: From Political Participation to Social Action

6.1. Introduction and Chapter Structure

This chapter presents a comparative analysis of how Ghanaian, Singaporean, and Welsh citizenship education curricula (hereafter CEC) have included, omitted, and framed the citizenship dimension *participation* between 1991 and 2024. Basic content analysis was employed to track changing frequencies with which the concept *citizen participation* appeared in the various syllabi over time, which in turn permitted a rudimentary assessment of the change in relative importance of the concept, at least to government sanctioned curriculum makers.

Total Mentions per Syllabus (hereafter TMS) and average References Per Page (hereafter RPP) were again used to compare provisions. Supplemented by textual analysis techniques and KSM analysis, deployed to uncover nuance, context, and meaning, and generally a deeper level of change and/or continuity within the countries' conceptions of the participation itself, as these also change over time.

It is generally accepted that *citizen participation* is a positive thing (Day, 1997, Stansbury and Irvin, 2004, Callahan, 2007 Michels, 2011; Radtke et al., 2017) even a “vital aspect” of democracy (Michels and De Graff 2010:477). From this positive perspective “dissent is rare” (Stansbury and Irvin, 2004:1) but beyond this accord are different ideas about who should participate, in what, when, where, to what extent, and perhaps most importantly, to what end. Answers to these questions vary but depend largely on underpinning ideological views of the

nature of government, the role of the citizen, and type of democracy and society that should be nurtured. On these questions, two contrasting schools of thought exist, firstly there is *participatory democracy*, which promotes increased citizen participation amid concerns over declining social engagement (Putnam, 1995) and political participation (Great Britain. Parliament. House of Commons Library, 2022), especially among children and young people (hereafter CYP) (Ekman and Amna, 2012), the secondly, there is, *representative democracy*, which prioritises system effectiveness over participation (Pitkin, 2007). This is an important distinction when analysing CEC for notions of citizen participation, which will be returned to in Subsection 6.4.4.

First however, beyond this introduction (6.1), Section 6.2 addresses quantitative analysis of how participation has been included, omitted, and framed in CEC over time, including frequency trends, synonymic choices, and Key Syllabus Mechanisms (KSMs). Section 6.3 addresses changing fields of citizenship participation, tracing the transition from political participation toward social action across contexts. Section 6.4 then addresses participation and exclusionary citizenship, focusing on age, children's rights, inclusion, and competing models of participative versus representative democracy. Section 6.5 addresses the emergence and consolidation of active citizenship in all three countries, highlighting its predominantly social and community-oriented character, and Section 6.6 addresses the changing scales of participation (local, national, global), examining how curricula reposition citizenship engagement beyond the nation-state. Finally, the chapter concludes (Section 6.7), synthesising quantitative and qualitative findings and assessing patterns of convergence, divergence, and depoliticisation in citizenship participation.

6.2 Shaping Participative Citizens: A Quantitative Analysis

6.2.1 Introduction

The quantitative analysis described in this section was threefold. Like the previous chapter, a basic content analysis of the key term (participation) and identified synonyms (engagement,

contribution, involvement) was first performed. Specifically, total mentions per syllabus (TMS) and average references per page (RPP) were recorded and tabularised (Tables 6.1). Secondly, brief comparisons are drawn between RPP trends for the terms participation and contribution, illustrated graphically. Finally, the same innovative analytical approach described in Chapter Four and applied in Chapter Five - Key Syllabus Mechanism (KSM) analysis - was implemented in order to uncover greater nuance and in the way the countries emphasise participation. The quantitative analysis uncovered an overall pattern of decline.

6.2.2 Citizen Participation: A Mixed Picture

Table 6.1 shows a fall in the frequency with which the concept *citizen participation* is mentioned in Ghana, despite the TMS figures showing nominal levels of growth. In Singapore, TMS figures have risen and fallen, though remain comparatively much higher than Ghana. In Wales, the concept appears strongly in the countries first and last CEC documents analysed, in *Community Understanding* (CCW, 1991) and the *Humanities AOLE* in (WG, 2019), between which, the Welsh data presented as variable. These changes are also illustrated graphically (Figures 6.1 and 6.2) to help compare national provisions.

Table 6.1 References to the Citizenship Dimension *Participation*.

	No. of Pages	Participation Mentions (Including Part as in Take)	Engagement Mentions	Contribution Mentions	Involvement Mentions	Total Mentions per Syllabus (TMS)	Participation Dimension References per Page (RPP) [to 2dp]
Ghana							
<i>Core Provision</i>							
JHS Social Studies 2007	51	3	0	1	0	4	0.8
JHS Social Studies 2020	158	2	0	6	3	11	0.7
JHS Social Studies 2024	129	2	1	8	1	12	0.11
<i>Extended Provision</i>							
Citizenship Education (2007)	44	14	3	7	4	28	0.63
Our World Our People (2019)	82	5	11	10	1	27	0.33
Singapore							
<i>Core Provision</i>							
Social Studies (2005)	19	1	0	2	1	4	0.21

Social Studies (2014)	49	10	2	33	1	46	0.94
Social Studies (2020)	57	44	2	28	3	77	1.35
Social Studies (2023)	32	13	1	7	0	21	0.66
Social Studies (2024)	48	8	2	12	1	23	0.48
<i>Extended Provision</i>							
Civics and Moral Education (2007)	71	15	8	14	10	47	0.66
Character and Citizenship Education (2014)	60	24	3	19	0	46	0.77
Character and Citizenship Education (2021)	34	3	5	14	0	22	0.65
Wales							
<i>Core Provision</i>							
Community Understanding (1991)	19	7	0	3	0	10	0.53
PSE (2008)	36	18	4	2	5	29	0.80
Humanities AOLE (2019)	84	45	46	12	0	93	1.11
<i>Extended Provision</i>							
Developing Curriculum Cymreig (2003)	66	11	1	2	3	17	0.26
ESDGC (2008a)	54	5	2	1	5	14	0.26
Wales Europe and the World (2009)	52	10	8	1	10	29	0.56
Unity and Diversity (2010)	67	14	14	2	7	37	0.46

Figure 6.1 Total Mentions per Syllabus (TMS) of *Participation*

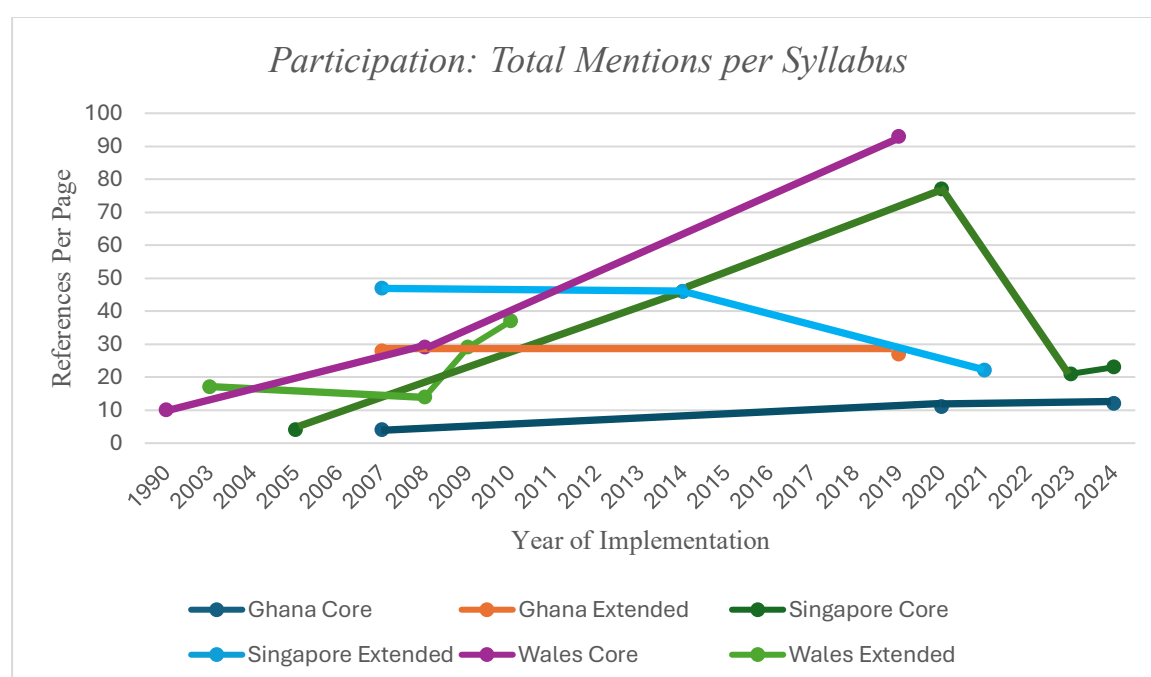
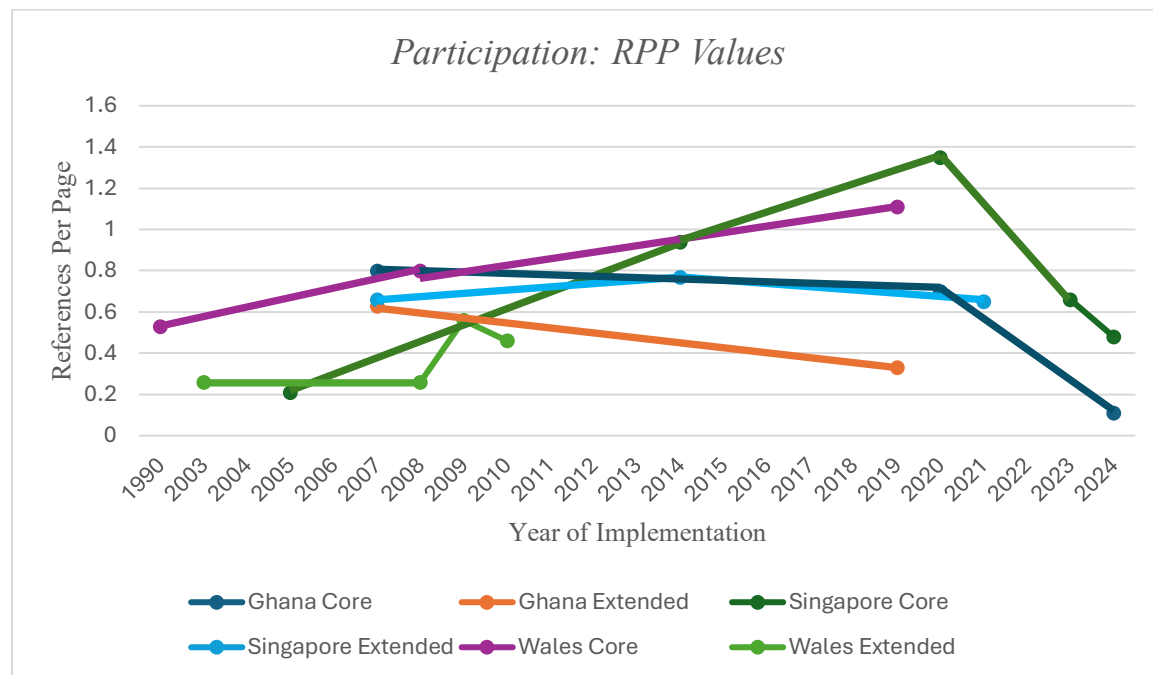


Figure 6.2 Average References Per Page (RPP) of *Participation*



Describing these trends, we see Ghana recorded a rise in TMS in their core provision, from 4 in 2005, to 11 in 2020, and finally to a high of 12 in 2024, though their extended provision dropped slightly, 28 TMS in 2007 to 27 TMS in 2019. RPP rose overall in Ghana's core provision (from 0.8 in 2007, to 0.7 in 2020, to 0.11 in 2024) but fell in the country's extended provision (0.63 in 2007 to 0.33 in 2019). Collectively, these figures present a mixed picture, of both an increasing and decreasing curricula presence for *participation* in Ghana's CEC.

A similarly mixed picture was found in Singapore, though a bell curve pattern to their data could be discerned. In Singapore's core provision, TMS figures broadly rose and fell, from 4 in 2005, to a high of 77 in 2020, and back to 23 in 2024. RPP figures followed a similar trajectory, rising from 0.21 in 2005, to 1.35 in 2020, to 0.48 in 2024. Interestingly, this same pattern appeared in Singapore's extended provision, where 0.66 RPP was recorded in 2007, rising to 0.77 in 2014, only to drop back to 0.65 in 2021. In contrast however, TMS figures simply fell, first slightly, from 47 in 2007 to 46 in 2024, and then significantly, to 22 in 2021. Essentially these figures were trending upwards, until 2020, when a reversal of the trend can clearly be identified. This is important as it suggests a change of policy or stance on the issue of citizen participation by the government, as intentional or not, representation of the concept

rose steeply until 2020, but fell sharply thereafter. If intentional, this suggests the Singaporean ideal-type citizen was being conceived increasingly as participative until 2020, beyond which it has become less participative.

Demonstrating much clearer trajectories, in Wales bar for the syllabus *Unity and Diversity* (WAG, 2010), TMS and RPP figures increased across the board, with TMS rising in the country's core provision, from 10 in 1991 to 29 in 2008, to a substantial 93 in 2019, and in their extended provision, from 17 in 2003 to 14 in 2008, to 29 in 2009, and to 37 in 2010. RPP figures also rose in Wales's core provision, from an already high 0.53 in 1991 to 0.80 in 2008, to the substantial 1.11 in 2019. Even though RPP figures dropped nominally between 2009 and 2010 (from 0.56 to 0.46 respectively) in the country's extended provision, it too recorded overall growth, from 0.26 in 2003 to 0.46 in 2010.

In terms of the current CEC implemented in each country, *participation* RPP features least in Ghana at a rate of 0.11RPP, but in Wales this is a whole order of magnitude higher at 1.11RPP, while Singapore occupy a middle position, recording 0.48RPP. The difference between the countries can also be seen in the TMS figures, where Ghana and Singapore recorded 12 and 23 respectively, but where Wales recorded a substantial 93.

In summary, despite a recent downturn in RPP in four of six total provisions, TMS figures generally grew, with the Welsh CEC lending itself most to shaping participative citizens, Ghana the least, and Singapore in a kind of middle position between the two. The differences are significant. Regarding convergence and divergence, there are strong patterns of both, across the TMS and RPP figures. However, if we isolate the TMS figures, we can see, that with only one exception, they are all increasing.

A close reading of synonymic choices raise a further question that the next section addresses directly, which is, beyond the words used to signify participation, how far do curricula structurally, and intentionally, prioritise citizen participation, by deploying the concept in key syllabus mechanisms (KSMs).

6.2.3 Synonymic Choice Matters (Contribution Versus Participation)

Words carry meaning and prompt different effects. Word choices can have significant effects on outcomes, and have to be considered carefully. Equally, words can be deployed in the pursuit of specific effects. Conscious or not, the choice to deploy one expression over another, can be revealing.

In this important regard, Ghanaian and Singaporean CEC contrasts with that of Wales, regarding how citizen participation is represented, through deployment of the term *participation* itself, or by using a synonym. The key point here, observed by Scaff (1975:461), is that, ultimately “whatever term or phrase is chosen to represent the participation of citizens in their societies and governance, ‘it involves a value-orientation’” (Scaff 1975:461[quotes in original])

As explained in Chapter Two, the term *participation* has connotations of bilateral, two-way, equitable, interactional, deliberative, and co-operative engagement of individuals in social and public life, where the term *contribution* can connote, quite contrastingly, a unilateral, one-way, instrumental, outcome-oriented action elicited from citizens by states. The former, can be emancipating, and the latter disempowering, when seeking to foster authentic citizen participation, as Arnstein (1969) described, it therefore matters which is chosen.

The study determined the frequency of five terms; part (as in take-part, partake, partakes, taken, taking part, takes part, taken part and took part), engage, involve, contribute and participate in each syllabus, and found the first three terms were used extremely sparingly, with a few exceptions, in all three countries, whilst the two remaining synonyms accounted for the majority of mentions overall, although not in a balanced way. In the syllabi analysed, Ghana and Singapore preferred *contribution*, whilst Wales preferred *participation*, moreover at a growing rate.

The content analysis presented in Table 6.1, included breakdowns for each of the synonyms TMS figures. These were used in the comparisons illustrated in Figures 6.3-6.5. Figure 6.3 shows that in Ghana’s core provision, their latest *social studies* syllabus, preferred the term *contribution* to *participation* by a ratio of four to one, with participation mentions having fallen, and contribution mentions risen since 2007. In Ghana’s extended provision,

contribution featured seven times less than *participation* in *Citizenship Education* (CRDD, 2007a) but increased in its replacement *Our World Our People* (NCCA, 2019), featuring five times more than *participation*.

Singapore experienced more variability in this regard. Shown in Figure 6.4 the latest syllabus in their core provision, *Social Studies* (CPDD, 2024) used the term *contribution* slightly more than *participation*. This too reflects a change, as in 2020 and 2023, the opposite was true. In Singapore's extended provision, currently entitled *Character and Citizenship Education* (SDCD, 2021), we see a clearer favouring of the term *contribution*, though this reflects a change of trajectory, from 2014, in which the syllabus's predecessor *Civics and Moral Education* (CPDD, 2007), preferred *participation*, suggesting a degree of undecidedness in Singapore's terminological choices.

By contrast to Ghana and Singapore, Wales, as shown in Figure 6.5, has consistently and increasingly preferred the term *participation* over *contribution*, with both terms experiencing a steep rise in usage in Wales most recently implemented syllabus, *Humanities AOLE* (WG, 2019). Together, these strong upwards trajectories, suggest a conscious and accelerated use of the term to foster participative citizens.

Figure 6.3 TMS in Ghana's Core and Extended Provisions

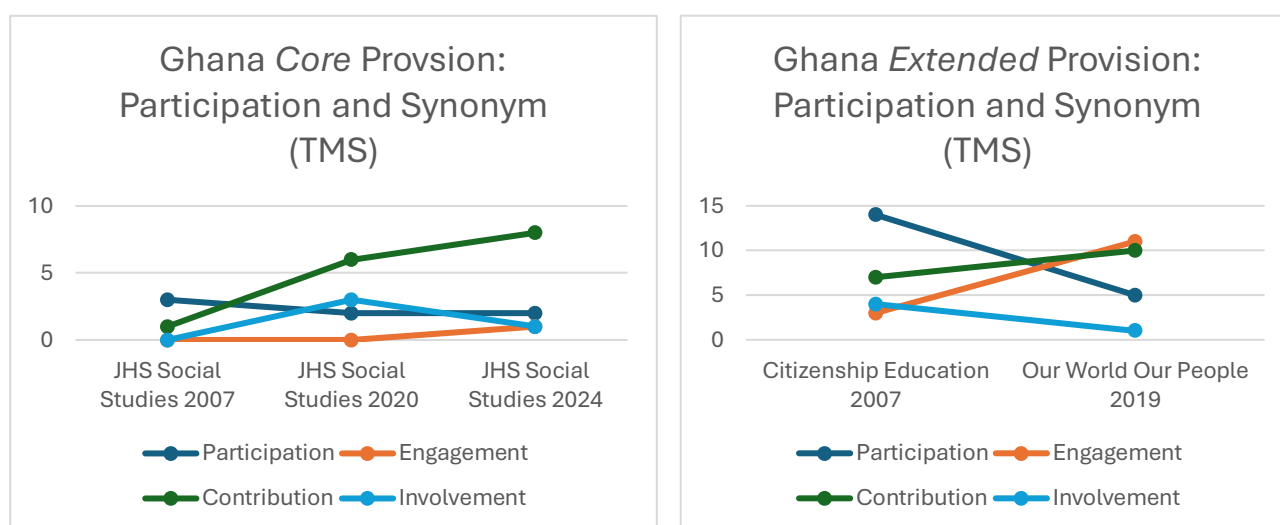


Figure 6.4 TMS Breakdowns for *participation* in Singapore's Core and Extended Provisions

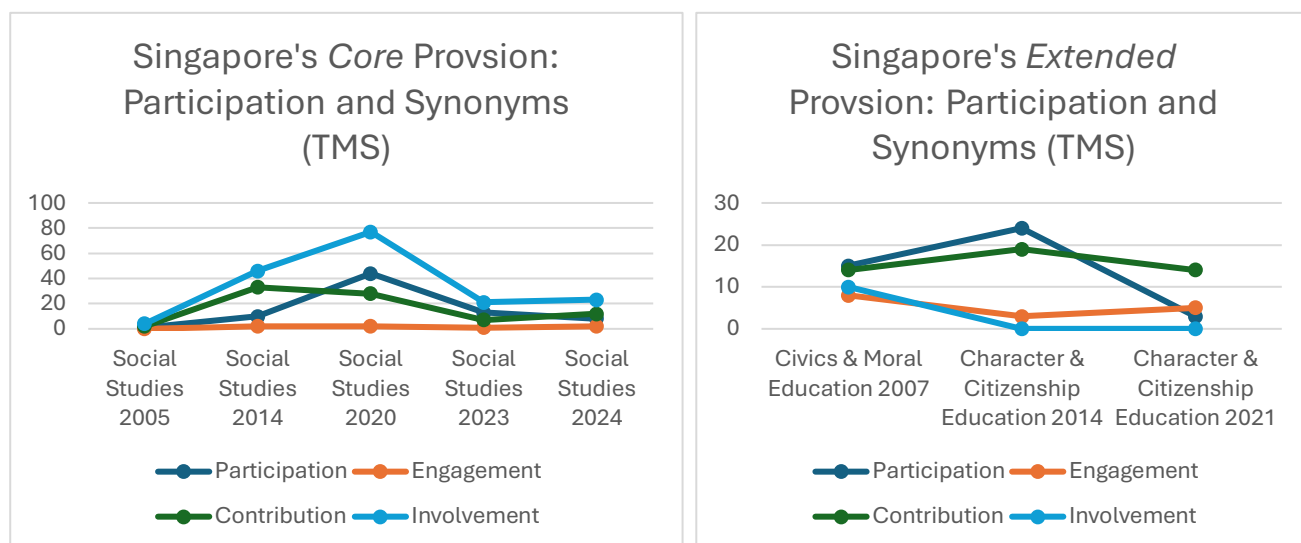
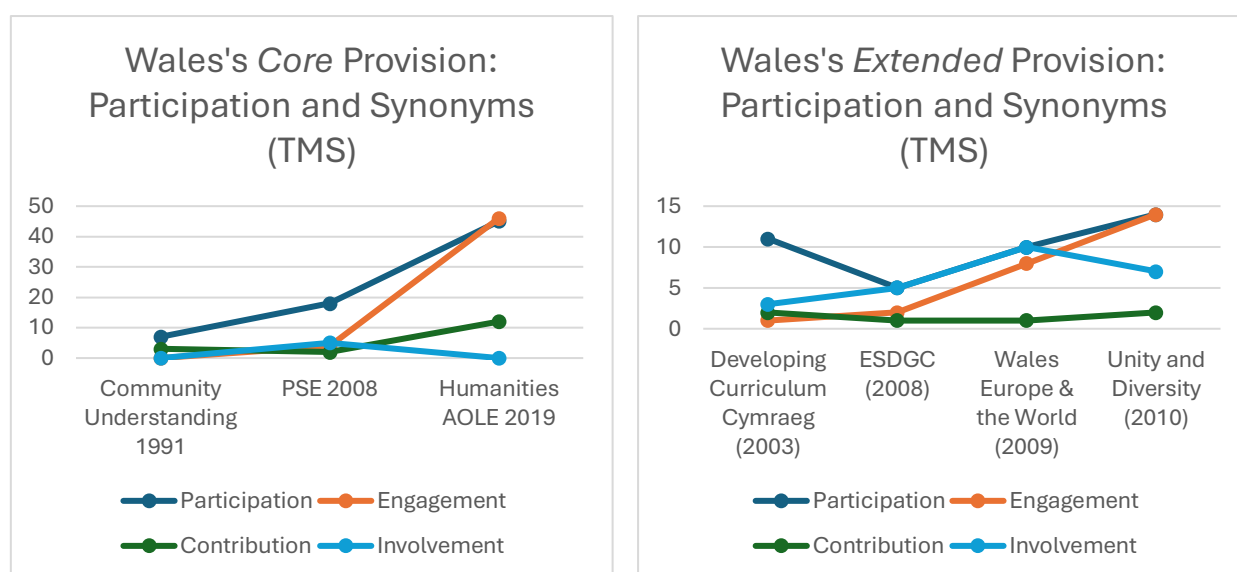


Figure 6.5 TMS Breakdowns for *participation* in Wales's Core and Extended Provisions



In summary, Wales contrasts with the other two countries, through its consistent and increasing preference for the term *participation* over *contribution*, where Ghana favours contribution¹³, and Singapore uses both variably. The potential influence of this decision is that overly deploying the term *contribution*, may lead to the shaping of citizens who are only expected to contribute, but not participate, where the use of *participation*, due the term's

¹³ Technically, engagement is preferred, but for the purpose of a contribution v participation comparison, contribution is preferred.

inherent bilateralism, may produce a more engaged citizenry, whose relationship with the state could be described as give-and-take, where contribution just implies giving.

6.2.4 Emphasising Citizen Participation with Key Syllabus Mechanisms (KSMs)

Key Syllabus Mechanism (KSM) analysis was again performed, and again proved revealing. Using the same seven KSMs as the previous chapter (*Scope, Rationale (or Philosophy), Syllabus Aims, Unit Aims, Syllabus Themes, Core Concepts, and Attitudes/Values*) a record was made every time the term *participation* or an identified synonym (*Engagement, Involvement, Contribution*) appeared in them. Again, all lexemes and inflected forms of each term and synonym were included, though mentions deemed impertinent were not. Tables 6.2-6.7 present findings of this analysis, wherein X denotes the presence of the concept *participation* in that particular KSM.

Table 6.2 KSMs featuring *Participation* in Ghana's Core Provision

Syllabus Title > Syllabus Mechanism V	<i>Social Studies 2007</i>	<i>Social Studies 2020</i>	<i>Social Studies 2024</i>
SCOPE			
RATIONALE		X	X
SYLLABUS AIM[S]	X	X	X
UNIT AIM[S]			
SYLLABUS THEMES (in Title)		X	X
CORE CONCEPTS			

Table 6.3 KSMs featuring *Participation* in Ghana's Extended Provision

Syllabus Title > Syllabus Mechanism V	Citizenship Education 2007	Our World Our People 2019
SCOPE		
RATIONALE		X
SYLLABUS AIM[S]		X

UNIT AIM[S]	X	
SYLLABUS THEMES (in Title)		
CORE CONCEPTS	X	
ATTITUDES and VALUES		

Table 6.4 KSMs featuring *Participation* in Singapore's Core Provision

Syllabus Title > Syllabus Mechanism V	Social Studies 2005	Social Studies 2014	Social Studies 2020	Social Studies 2023	Social Studies 2024
SCOPE					
RATIONALE	X	X	X		X
SYLLABUS AIM[S]		X	X	X	X
UNIT AIM[S]		X	X		
SYLLABUS THEMES (in Title)			X	X	X
CORE CONCEPTS		X	X		X
ATTITUDES and VALUES			X		

Table 6.5 KSMs featuring *Participation* in Singapore's Extended Provision

Syllabus Title > Syllabus Mechanism V	Civics and Moral Education 2007	Character and Citizenship Education 2014	Character and Citizenship Education 2021
SCOPE	X		
RATIONALE	X		
SYLLABUS AIM[S]	X	X	X
UNIT AIM[S]			
SYLLABUS THEMES (in Title)		X	X
CORE CONCEPTS	X		
ATTITUDES and VALUES	X		

Table 6.6 KSMs featuring *Participation* in Wales's Core Provision

Syllabus Title > Syllabus Mechanism V	<i>Community Under- standing (1991)</i>	<i>PSE (2008b)</i>	<i>Humanities AOLE (2019)</i>
SCOPE		X	X
RATIONALE	X	X	X
SYLLABUS AIM[S]	X	X	X
UNIT AIM[S]			X
SYLLABUS THEMES (in Title)	X	X	X
CORE CONCEPTS	X	X	X
ATTITUDES and VALUES	X	X	

Table 6.7 KSMs featuring *Participation* in Wales's Extended Provision.

Syllabus Title > Syllabus Mechanism V	<i>Curriculum Cymreig (2003)</i>	<i>ESDGC (2008a)</i>	<i>Wales Europe and the World (2009)</i>	<i>Unity and Diversity (2010)</i>
SCOPE				
RATIONALE	X	X		X
SYLLABUS AIM[S]		X	X	
UNIT AIM[S]				
SYLLABUS THEMES (in Title)				
CORE CONCEPTS		X	X	
ATTITUDES and VALUES			X	

To summarise the KSM findings, in Ghana, there was a limited and uneven increase, with participation gradually appearing in more KSMs in the core provision but remaining inconsistent overall. Singapore showed an overall increase in the core provision, where participation was progressively embedded across a wider range of KSMs, albeit alongside a decline in the extended provision, where the concept presented less over time. In Wales however, participation demonstrated a strong and sustained increase in the core provision,

contrasted with a variable trend in their extended provision, where KSM usage first expanded before being scaled back. Although as has been suggested, this is more likely a result of the varied curricula interventions implemented in Wales as part of their extended provision, than changes of policy on key issues. In this way, it could be argued, Wales's core provision is more representative of actual trends, than their extended provision.

6.2.5 Conclusions

To summarise, KSM usage in all three countries' core provisions rose over the study period, indicating efforts to raise participation, aligning with the TMS figures recorded. However, this stands in conflict with the RPP figures, which showed participation to be broadly receiving less curriculum attention over time, in most (5/6) provisions. Overall, this can be considered to reflect a general increase in curricular presence and emphasis on citizen participation, supporting the notion that the countries are increasingly seeking to raise participation.

However, the contrast between the KSM and TMS findings, and the RPP figures, suggests a tension, but it is argued here, increasing KSM usage indicates more accurately government intentions, over a rise (for argument's sake, proportionally) in syllabus references, because, as explained in Chapter Four, KSM placement signals intent and frames the concept more strongly in the curriculum, particularly if manifested as rationale or a syllabus aim. In this sense the participative or participatory citizen, is now an underpinning "rationale", a prescribed "syllabus aim", or key "what-matters-statement", in Ghana, Singapore and Wales's most recent CEC respectively, as illustrated in the quotes below:

The philosophy of learning Social Studies [in Ghana] is based on the need to train citizens who are reflective, concerned, active and participatory citizens to fit into the ever-changing world and contribute their quota to society. (NaCCA, 2024:xii)

As participative citizens, students [in Singapore] will: take responsible personal and collective actions to effect change for the good of society; and be resilient in addressing concerns of society despite challenges faced. (CPDD, 2024:6)

This will enable learners [in Wales] to take committed social action as caring, participative citizens of their local and global communities, showing a dedication to justice, diversity, and the protection of the environment. (WG, 2019:8,15and70)

We can infer therefore, that actually, despite all three countries seeing drops in RPP figures, the KSM analysis, in alignment with the TMS figures, which show growth, are a more insightful reflection of government intent, or at least that of sanctioned curriculum makers, and show that, overall, *participation* is an increasingly important dimension of good citizenship, in all three countries' CEC. The remainder of this chapter analyses CEC interpretations of citizenship qualitatively, as marked changes in the way participation is conceived can also reflect policy changes, and are key to answering the first and second research question in this study.

6.3 From Political Participation to Social Action: Changing Fields of Citizenship Participation (Mixed Analysis)

6.3.1 Introduction

Thus far, the chapter has presented quantitative findings and insight. The remainder of the chapter includes mixed quantitative and qualitative analysis, and asks in which fields (*family, school, community, work, environment, government and democracy*) Ghana, Singapore and Wales, are seeking to foster citizen participation in, whether this is changing, and ultimately, addressing the overarching research question, whether this constitutes convergence. Though all three countries have emphasised the importance of cultivating participative citizens, albeit to differing degrees, their CEC are both converging and diverging regarding the fields in which participation is envisaged, as outlined in the following sections on economic and environmental participation (6.3.2), political participation and democratic engagement (6.3.3), and community participation and social development (6.3.4).

6.3.2 Economic and Environmental Participation as core Aspects of Citizenship

There has been a consistent and uncontroversial effort in all three countries to cultivate *economic* and *environmental participation*, since at least 2005. The terminology and discourses differ slightly regarding economic participation, we see it fostered in Wales through discourses of “the world of work”, in Singapore as “managing financial resources” and Ghana as, “hard work”, but the goals remain broadly the same, to inculcate the necessary skills and knowledge required for economic participation, and environmental protection. Though interestingly these two appear conflated in much of the Ghanaian CEC. A lot can be read into these different discourses, and indeed environmental and economic CEC aims and content more broadly, but given their ubiquity across all provisions, as well as thesis space and time restrictions, the chapter restricts its focus, in the next two sections, to the exploration of the countries’ efforts to foster political (6.6.3) and social participation, as these offer much richer and more relevant contexts to explore conceptions of citizenship.

6.3.3 Political Education, Without Political Participation

Across the three countries, political education understood as content referring to government, politics and democracy (GPD) persists, but it does so largely as knowledge about democratic systems rather than as an invitation to participate in them, curricula focusing on decision-making and generic forms of participation have expanded, but the explicit linking of participation to GPD content, once present in all three countries’ earlier syllabi, has been almost entirely phased out.

In Ghana, political education has not disappeared but has clearly declined in volume, status, and purpose. The combined references to government, politics and democracy in *Social Studies* fell from eighty-one mentions in 2005 to fifty-two in 2020 and just thirty-three in 2024. This decline is mirrored structurally. In 2007, political education was one of only three organising themes in *Social Studies*, under the heading “Governance, Politics and Stability”, where pupils were to “recognize the structure of government in Ghana and the functions of the various arms of government” (2007:20). By 2020, this had been demoted to a sub-theme, “Promoting Democracy and Political Stability”, nested within the larger theme “Law and Order”, an approach retained in 2024 under “Political Institutions and Structures in Ghana”

but again within “Law and Order in the Ghanaian Society” (2024:vi). A similar contraction was evident in the transition from *Citizenship Education* (CRDD, 2007a) to *Our World Our People* (NCCA, 2019), where GPD references fell from eighty-two to twenty-three, and where political education was removed entirely from the curriculum aims, rationale, philosophy, and unit aims.

Earlier Ghanaian syllabi, however, linked political education to participation, albeit narrowly. *Citizenship Education* (CRDD, 2007a) included unit titles such as “How to be a democratic citizen” and “Peace Building and Democratic Living” and made explicit calls for participation, including “voting during elections” and “expressing their views on issues” (CRDD, 2007:24, 24 and 27). Pupils were told they should “acquire skills and knowledge for voting people into positions of authority” and examine authority and power (CRDD, 2007:ii). Democratic governance was described as a system where “people participate in decision-making” (2007:27), and even participatory conceptions extended into everyday life through content such as “democratic living in the home”. However, this orientation did not survive into later reforms. *Our World Our People* (NCCA, 2019) retained GPD content only as contextual knowledge, understanding good governance, identifying political regions, and describing international cooperation, without forming any argument for citizen participation in GPD. What persists, therefore, is political education as history, structure, and national justification, consistent with Evans (2006:83) notion of curricula legitimising government, rather than enabling participation.

Singapore presented a sharper contraction, with their CEC almost entirely omitting explicit political education at the lower secondary level for several decades. This was not always the case however, as *Social Studies* (CPDD, 2005) included political education as a curriculum aim, “To know the system of government and the principles of good governance” (2005:2), and dedicated a full theme to “Governing Singapore”. Students were to study “representative democracy”, and government structures, where a syllabus aim required knowledge of “the principles of good governance” (2005:12). *Civics and Moral Education* (CPDD, 2007) went further by explicitly defining “Being an active citizen” and stating that active citizens “take part in policy making” and that political knowledge would “enable citizens to participate effectively in the democratic process, e.g. when voting, and empower them to play a more active and meaningful role in the way Singapore is governed” (2007:32). These were clear attempts to foster political participation. Yet this has effectively disappeared. Across 2005,

2014, 2020, 2023 and 2024's Singaporean *Social Studies* syllabi studied, the term politics appears only a handful of times, often merely as an item in a list of academic disciplines, "History, Geography, Political Science, Sociology and Economics" (2014:8; 2020:10; 2023:8).

In Singapore's current CEC provisions, *Character and Citizenship Education* (SDCD, 2021) and *Social Studies* (CPDD, 2024), politics is mentioned just five times, mostly as historical content, never linked to participation. Even where GPD content does appear it emphasises clearly delineated, non-overlapping roles, citizens contribute socially and to nation building, and government governs. This separation has the effect of 'othering' the government from the citizen and reinforces a representative, non-participatory model consistent with Singapore's long-standing political context. At the same time, references to participation have increased, but almost exclusively in social and community forms, less so with political ones. Again, this was not always the case, as recently as *Social Studies* (CPDD, 2020:27 and 36) student were told to "appreciate the role played by citizens in the government's decision making processes.", though even this suggest students and citizens are separate, and gives no indication of what that role is.

Wales differed in trajectory. From the earliest syllabus analysed, *Community Understanding* (CCW, 1991), Welsh curricula have explicitly linked political education and participation. One of eight components of this earliest attempt at a Welsh CEC, "participation in decision-making", required pupils to examine how power operates "at a number of levels: the family, the classroom, the school, local government, national government and internationally through such agencies as the United Nations", and to "be aware of the part they can play as individuals" (1991:8). Pupils were to "acquire the knowledge and skills that will permit them to participate fully in decision-making processes" and learn about democracy "in practice" (1991:8), including political parties and pressure groups. Subsequent syllabi in the late 2000s expanded political education further. *Personal and Social Education* (WAG, 2008) stressed "the importance of participating in democratic elections and the links between political decisions and their own lives" (2008:22) and sought to develop political literacy enabling learners "to make effective decisions and judgements in the world of political and legal systems" (2008:11). *ESDGC* (WAG, 2008a) defined active citizenship to include "political literacy" (2008:12), and called on learners to "participate in democratic elections and consultation processes" (2008:42), and even required participation in decision-making within

schools themselves (2008:17). *Wales Europe and the World* (WAG, 2009) provided extensive contexts for engagement with politicians, pressure groups, mock elections, and debates, but no clear calls to participate in GPD were found, though they were required to critically, contextualise Welsh government:

The study of Government and Politics encourages students to look critically at both theory and practice... The development of the devolved government in Wales, with its implications for politics and local administration, provides ample opportunities to compare and contrast both with central government and with other governmental and political systems studied. (ACCAC, 2003:9)

Even at their strongest, these syllabi often framed participation narrowly, as voting, consultation, debate, and frequently positioned political decisions as something external to learners' lives, to be "influenced" rather than made, echoing Arnstein's (1969) critique of tokenism. More importantly for this study, *Humanities AOLE* (WG, 2019) included GPD concepts ubiquitously, but they largely appear in undeveloped lists, such as "political, legal, socio-cultural, religious and economic factors" (2019:80), with no elaboration and no explicit call for participation. Decision-making as a generic right continues to be valorised, reflecting long-standing discourses of children's rights and devolved governance, but it is no longer directly connected to government, politics, or democracy.

Taken together, a clear pattern can be discerned across all three countries. Political education in the form of GPD content persists, whether as national history and national justification in Ghana and Singapore, or as ubiquitous but thinly elaborated suggested context in Wales. At the same time, notions of participation, especially participation in decision-making, have expanded, often framed as universal rights rather than political acts. However, importantly, what is no longer included in all three countries CEC, are explicit links between decision-making and GPD. Earlier syllabi in Ghana, Singapore and Wales all connected political knowledge to participation, even if narrowly conceived, contemporary curricula however, largely do not. The findings suggest CEC have been depoliticised, while participation is now generally contextualised as a social activity, and as rights-based decision-making, leaving the politically participative citizen largely absent from the countries current CEC provisions.

The following section examines a further convergence across the cases, namely the treatment of participation within the school, particularly through school councils and decision-making practices, as a form of preparation for political participation in government, politics, and democracy more broadly.

6.3.4 School-Based Decision-Making as Pre-Political Participation

The CEC analysed often presented participation in the school as a proxy for political participation. The most visible examples of this occurred when school councils were addressed and promoted. Another form of participation in the school that reflects efforts to raise participation in GPD more broadly, it can be argued, were the numerous attempts to involve pupils in decision-making, either regarding school policies or more commonly curriculum decisions. This is of course most pronounced in Wales's new curriculum, which allows schools to ultimately design their own curricula, guided that is, by the documents analysed here.

The growth in discourses of 'participation in decision-making' can be traced to the UN, or more specifically, the UDHR (1948) and UNCRC (1989), and can, where present indicate pro-globalist, and pro-universal rights positions. This is strongly the case in Wales, where such discourses have remained throughout several phases of reform, from the first and last CEC interventions included in the analysis. Whilst decision making, or 'making informed decisions' is a discourse also commonly found in Ghanaian CEC, 'participating in decision-making' is not. Decision making has been a consistent curriculum presence in Ghana, and is now a core competency "Preparedness to make better decisions using available information", appearing twelve times in *Social Studies* (CRDD, 2024). It was also found most pertinently in a list of good citizenship behaviours, listed in *Citizenship Education* (CRDD, 2007a):

1. participates in national development.
2. protects the environment.
3. participates in communal labour.
4. protects public property.
5. respects elders and authority

6. participates in decision-making at home and in school e.g. voting during school elections.
7. is honest and avoids any form of cheating.
8. gives a helping hand to the elderly (2007:3)

Singapore's focus on developing students' decision-making capacities can be seen in the set of curriculum aims included through five version of *Social Studies* (2014, 2016, 2020, 2020b, 2023, and 2024). These syllabi included the following general curriculum aims, "apply reflective thought in making quality decisions", "evaluate information, consider different viewpoints and exercise discernment in reaching well-deliberated conclusions and responsible decisions", and "have an awareness of the ethical considerations and consequences of decision-making".

Mainly, however, the country's CEC includes discourses of 'responsible decision-making, with that exact phrase appearing twenty-four times in *Citizenship Education* in 2007 and five times in its replacement. What does not appear as frequently are references to participation in decision making at the school or in the home or community. They are to participate in these places yes, but not necessarily in the associated decision-making. Essentially it can be argued, Welsh CEC continues to view the school as a proxy for political participation, and decision-making within the home as proxies for political decision-making, Ghanaian CEC no longer seems to, though they had, and Singapore never really did. This matters because providing safe spaces for pupils to practice democracy and political engagement, in order to learn how to be a democratic and politically active citizens, a common contemporary goal, catalysed by recent misgivings with public education and its capacity to supply politically literate and participatory citizens (the disengagement paradigm), is crucial if CYP are to evade indoctrination and discern misinformation. This is learning to do citizenship (action-experimental) as opposed to learning about citizenship, and is a progressive trend in the field, which is increasingly believed to be an effective way to cultivate particular citizenship traits.

6.3.5 Community Participation and the Socialisation of Citizenship.

Across Ghana, Singapore, and Wales there has been a clear and increasing curricular emphasis on citizen participation, particularly through the concept's deployment in the

countries' KSMMs as shown in Section 6.2. Unlike efforts to foster political participation, which were found to be fading in the countries CEC, community participation and social development are consistently and explicitly linked to the idea of what it means to be a citizen, across the board. While the trajectories differ in emphasis and expression, all three countries increasingly conceive citizen participation as something done in, for, and with communities, rather than primarily through formal political institutions.

In Ghana, despite references to citizen participation having declined over time, those that remain have become more narrowly and consistently community-focused, increasingly emphasising socially cohesive citizenship. In *Social Studies* (CRDD, 2007) there was little evidence of a coordinated or focussed approach to fostering participation generally, with mentions scattered across disparate topics, and only one explicit attempt to link participation to community life. This appeared in a statement of the “desired characteristics of citizens for nation building”, which included:

...democratic living at home and in the workplace; respect for elders and for authority, hard and productive work attitude, voting during elections, joining neighbourhood associations, and doing neighbourhood work, maintaining public property, tolerating one another and participation in community activities (2007:8).

Although this list includes civic and political behaviours such as voting, the dominant emphasis is clearly social and relational, tolerance, respect, neighbourhood work, communal responsibility, and maintenance of shared resources. These are framed less as political acts and more as the moral and social dispositions required for peaceful coexistence, or as the title states “nation building”.

Over time, Ghana's curricula showed fewer explicit invocations of participation, but an increasing homogeneity in how participation itself is conceived, namely as participation that strengthens community cohesion and social order. Participation is taught less as active contestation or social change, and more as a set of values, attitudes, and behaviours that sustain harmony in everyday communal life. This strategy is plausibly linked to Ghana's high ethnic, cultural, and religious diversity, where education has long been positioned as a mechanism for fostering unity, tolerance, and social stability.

In Singapore, social cohesion combined with structured social action, characterises their CEC. In the introduction of the earliest Singaporean syllabus analysed, *Social Studies* (CPDD, 2005), participation is framed as enabling students to contribute to “the improvement of our local and global communities” (2005:1) indicating communitarian influences, by reference to multiple communities. However, direct references linking participation and community were limited, with the only explicit pairing, “community participation and involvement”, appearing just once, as a desired value/attitude in the topic “Housing Our People” (2005:10), where neither was elaborated nor revisited.

A significant transition occurred in *Social Studies* (CPDD, 2014:5), which saw an explosion of participation-related content. A participative citizen was now defined as someone who would:

- be motivated to identify issues of concern and take action.
- be resilient in addressing concerns of the community or society; and
- take personal and collective responsibility for effecting change for the good of society.

Here, the social orientation became explicit, “The curriculum therefore envisions SS students as informed, concerned and participative citizens” (2014:4). The phrase “Care for others and contribute actively to the progress of our community and nation” was repeated six times (2014:7,7,7,43,44and47), the message closely aligning with the Desired Outcomes of Education (since 1997), also listed, which define a concerned citizen as one who is “responsible to their family, community and nation and take[s] active roles in improving the lives of others” (2014:33).

Since 2014, Singapore has maintained socially oriented KSM aims, particularly around social cohesion in a diverse society, ethical reflection, and engagement with societal issues.

However, unlike Ghana, Singapore increasingly couple’s discourses of social cohesion with explicit expectations of social action (as will be shown shortly, so does Wales).

Singapore’s extended provision, (*Civics and Moral Education* (CPDD, 2007), and *Character and Citizenship Education* (SDCD, 2014 and 2021)) reinforced the notion that citizens should socially engage and participate in their community, via a constant incorporation of experiential learning projects such as the *Community Involvement Programme* (CIP) in 2007,

and *Values in Action* (VIA) in 2014 and 2021, all of which require authentic participation in community settings. Since 2014, *Social Studies* syllabus aims have consistently addressed participation skills such as negotiation, (CPDD, 2014:5, 2020:5, 2023:3, 2024:6) in order to develop interpersonal harmony, while maintaining social order.

Key examples of Singapore's concern with the capacity of citizens to engage healthily and productively in society, included SEL or rather Social and Emotional Learning in 2005 and the 21st Century Competencies Framework in 2010, both of which sought to develop the pupil-citizen's social capacities.

Figure 6.6 Singapore's Social and Emotional Learning (2005) framework, and the 21st Century Competencies Framework (2010).



(MOE, 2025)

Whilst present in earlier *Social Studies* (2005 and 2014) syllabi as 21st Century Competencies, the formalisation of social needs into underpinning educational policy, reflected a strong social orientation, that Singaporean CEC presented. Given the accompanying strong focus on morality, particularly, as the name suggests, in *Civic and Moral Education* (CRDD, 2007), these findings resonate with broader patterns in Asian CEC research, as articulated by Lee (2003), who wrote of Asian citizenship studies:

As far as the nature of citizenship is concerned, there is an inclination toward relationship rather than rights and responsibilities. And as far as relationship is

concerned, there is an inclination toward harmony in civic relationship. Moreover, in Asia, there is always an attempt to perceive an individual in his/her relationship with the society and nature from a moral and spiritual dimension. (2003:1)

This is important as it supports the notion that citizenship is geographically and contextually dependent.

Overall, Ghana and Singapore have increasingly sought to shape socially minded citizens, capable of getting along, and avoiding conflict. This focus has grown over the years but generally reflected the same goal - social harmony. In Singapore however, there is evidence of a different agenda emerging, one that is aligned with a form of blended version of Westheimer and Khane's (2004) second and third type of citizen, the participative citizen, and the socially justice-oriented citizen.

This is an effective way of understanding Wales's curriculum journey. Here this transition was even more stark, from community participation to social action. A focus on community participation was strong in *Community Understanding* (CCW, 1991), where learners were encouraged to become, "active, participating, critically reflective members of their communities in Wales, or wherever they may subsequently live" (1991:5), and has been ever-present since. This early framing is striking in both its communitarian and plural orientation, recognising that individuals belong to multiple communities and may live beyond national borders. This position, recognising postnational citizenship, was consolidated throughout the syllabus, with a key syllabus aim helping pupils to "take an active and meaningful part in the life of their communities" (1991:3).

Subsequent syllabi, *Developing the Curriculum Cymreig* (ACCAC, 2003), deepened this commitment by requiring "practical involvement" (2003:12), including voluntary activity (2003:11), and also required "candidates are expected to take part in a voluntary activity in their own community" (2003:11), similar to the requirement in Singapore. Though in *PSE* (WAG, 2008) the only requirement was to understand "how individuals and voluntary groups can bring about change locally, nationally and internationally" (2008:24), though they were explicitly advised to "engage in practical involvement in the community" (2008:2) Active citizenship was also explicitly defined as to "participate in community life through service and action which promotes the well-being of that community" (2008:11). Across

Singapore's extended provision, community participation was consistently framed as both experiential and ethical, grounded in action rather than disposition alone, aligning with the position in the current Welsh CEC but contrasting with that of Ghana's.

This long-standing focus culminated in the *Humanities AOLE* (WG, 2019), where references to participation, community, and society increase dramatically, and where crucially, participation is now repeatedly and explicitly framed as social action, with learners expected to "take committed social action as caring, participative citizens of their local and global communities" (2019:8), "participate in society and social action" (2019:31) as well as to "participate in social action in response to challenges and opportunities locally, nationally and globally" (2019:80). Here, the goal it seemed was not just to promote belonging and cohesion, though the CEC does do that also, but was also to develop learners as agents capable of understanding, questioning, and changing society, a shift that aligns closely with UNCRC principles around participation, voice, and agency.

In conclusion, all three countries demonstrated a clear and increasing emphasis on citizen participation. Ghana has pursued a predominantly socially cohesive model, likely reflecting its cultural and ethnic diversity. Singapore follows a similar cohesion-oriented path, again likely reflecting their diversity, but increasingly integrates social action, consolidated in the curriculum, through experiential programmes. Wales too, has maintained a longstanding commitment to community participation, which in its most recent curriculum is unmistakably oriented toward social action, change, and learner agency.

6.3.6 Conclusions

This section has shown that while Ghana, Singapore and Wales all emphasise participation as a core dimension of citizenship, they increasingly conceptualise participation in socially and communally bounded terms rather than as engagement with government, politics, and democracy. Across the countries, economic, environmental, and especially community participation are strongly and explicitly linked to citizenship, whereas political participation has been progressively narrowed, displaced, or re-routed through decision-making and school-based practices. Earlier syllabi, from all three countries explicitly linked political knowledge to participation, contemporary curricula, by contrast, tend to preserve political education as descriptive knowledge while promoting participation as largely a social practice.

The findings point to a pattern of convergence, where participation content has expanded, and its political content has been somewhat diluted, leaving the politically participative citizen a marginal role within current CEC provisions.

6.4 Participation and Exclusionary Citizenship

6.4.1 Introduction

A key debate in the literature relates to citizenship status, who gets it and who is excluded.

This has implications for the question of who participates in democracy and society.

Citizenship as a legal status has a long history of a lack of universality, with the exclusion of slaves in ancient Rome, women until women's suffrage, and people of colour until the civil rights movement.

This section consequently examines how the three countries' CEC addressed CYP. It first considers how age shapes the right to participate, particularly in decision-making, in line with Article 12 of the *UNCRC*. It then explores efforts to broaden inclusion, especially regarding gender expressions. Finally, the section examines the CEC for notions of representative or participative democracy, to see if political participation itself is considered a key aspect of citizenship, or whether participation in politics is more narrowly understood. Overall, the analysis found that all three countries have expanded their understanding of citizenship, who counts as a citizen, and who citizenship applies to.

6.4.2 Right to Participate as Children

Since 1989, children have theoretically at least, had the right to participate in decisions affecting their lives (*UNCRC*, 1989), even if in practice this is not the case. The notion that citizens have a right to participate in the decisions affecting their lives is frequently expressed in the literature (Wengert 1976; Midgely 1986; Roberts 2003). It is a universal human right (*UDHR* 1948), a stated right of the child (*UNCRC* 1989), and a fundamental tenet of many contemporary notions of citizen participation. Its adoption in CEC can indicate globalist, cosmopolitan or otherwise supranational and postnational perspectives, and can be identified

by a.) lots of references to supranational organisations like the UN and UDHR, and UNCRC, b.) an acknowledgment of youth citizenship and young citizens, c.) the inclusion of school councils, and other preparatory processes of democracy, such as class presidents, and student votes. Conversely statements that acknowledge children not to be citizens, primarily by positioning citizenship as an outcome of education, convey the idea that CYP require training before they can participate effectively.

Of particular interest in this section is whether CYP, defined here as being under the age of sixteen, are portrayed as citizens-in-training, or as full-citizens-now in the countries' CEC. The former view presupposes CYP are not citizens by nature and necessarily require development to become a fully participative citizen. The latter view however recognises CYP as full-citizens-now. Which view is adopted has implications for participation, a citizen-in-training view presupposes participation as a goal of the process of citizenship education, it is instrumental and outcome oriented, where a full-citizen-now view sees pupils as citizens, complete with rights, the most pertinent here being the right to participate, and so opportunities for their participation should be provided, though possibly in a way that is age accountable.

Since at least 2007, Ghanaian CEC has presented an inconsistent framing of the child, sometimes as full citizen, and others as citizen-in-training. For example, *Citizenship Education (CRDD, 2007a)* used the future tense instructing pupils “how to become a democratic citizen[s]” (2007a:ii) and determining whether “...he/she will become a responsible adult citizen.” (2007a:31), as well as building students “into responsible citizens” (2007:ii). The phraseology did not recognise the child as-full-citizen. However, the same year, whilst generally utilising future tense, *Social Studies (CRDD, 2007)* also urged pupils to “recognize his/her rights as a citizen of Ghana” (2007:4)

By 2019 in *Our World Our People* (NCCA, 2019), the view of pupils *as* citizens had been established and the inconsistency settled. In *Social Studies (CPDD, 2014)*, sub-strands such as “Being a Citizen” and phraseology including “as a citizen”, “as a global citizen” and “as a responsible citizen” indicate a view of CYP as holding the status of citizen. However, in 2020's version, there is reference to “producing citizens” in the general aims and “enabling” them in the specific aims, as well as “becoming citizens” in the rationale, whilst pupils are

also directly instructed to, “Discuss the rights of the child as enshrined in the 1992 Constitution” (CPDD, 2020:91), leading to a mixed picture.

Despite never addressing the UNCRC or child’s rights directly, the first three Singaporean *Social Studies* curricula analysed here (2005, 2014, 2020) contained both stances, citizen-in-training, and citizen-now – like Ghana. However, a transition was discernible. In *Social Studies* (CPDD, 2014) explicit statements clarified a view of the pupil as citizen-in-training “SS seeks to develop the civic competencies of students by the end of a 10-year Social Studies education.” (2014:5), supported by the syllabus aims, that also present students’ citizenship as a contingent possible future status, and not a current status which they are afforded. However, by 2020, a transition had mostly occurred, where phrasing becomes more consistently student “as citizen” as seen in the following examples:

The Curriculum therefore envisions students as informed, concerned, and participative citizens (CPDD, 2020:4)

This will guide them in making well-reasoned and responsible decisions as informed, concerned, and participative citizens in a globalised world (CPDD, 2020:25)

However, this phraseology was not consistent, as shown in the following examples that perceived the student as in need of development, before full citizenship is bestowed, such as:

The syllabus considers societal issues that affect the lives of the students and prepares them for the responsibilities they need to exercise as citizens. (CPDD, 2020:10)

And,

The knowledge, skills and values acquired through exploring these Issues will develop students into informed, concerned, and participative citizens. (CPDD, 2020:10)

Nevertheless, a broad transition from pupil as citizen-in-training to pupil-as-citizen can be discerned.

Perhaps more indicative of intent, as situated in the KSM syllabus aims was the consistent use of a full-*citizen-now* approach, for all three core aims, “as informed, students will understand...”, “as concerned students, citizens will have...”, and “as participative citizens, student will take...” (CPDD, 2020:5). Also, examples explicitly identified CYP as active citizens, as they are prompted to “explain how youths can be active citizens in building an inclusive society.” (2020:29), although the linked *Desired Outcomes of Education (MOE, 2025)* underpinning all learning in Singapore, were still listed as “attributes that educators aspire for students to have by the completion of their formal education” (2020:6). The same mix was found in *Social Studies* (CPDD, 2023:3) three years later.

In contrast, Wales has generally conveyed the pupil as citizen, in line with the broader integration of UNCRC principles, since at least 2008. Examples include acknowledgements in *PSE* (WAG, 2008) of the “UNCRC” (2008:6and11), the “United Nations Convention on the Rights of the Child” (2008:19) and the cross-cutting theme “Human rights education and the United Nations Convention on the Rights of the Child (UNCRC)” (2008:41). This is an important and direct acknowledgement of the UNCRC’s principles, namely the right of any pupil to have their view considered in any decision that affects them. This in general, and in Wales’s new curriculum, has led to the promotion of school councils, mock elections, and student representatives, all of which function as a sort of formative politics (Dagger 2014), preparing pupils as citizens for participation in politics and democracy. This active approach is also arguably better at fostering behaviours than simply ‘learning about’ politics in a traditional fashion.

The UNCRC views children as full citizens now, not as has historically been the case, as citizens-in-training. This can be seen in Welsh curricula, particularly in *ESDGC* (WAG, 2008a) and in *Unity and Diversity* (WAG, 2010), where the school is adopted as a proxy for national government, but has been quite inconsistent since. However, Wales currently views children-as-citizens- now, courtesy of its application of UNCRC principles.

6.4.3 Participative Citizens or Citizen Representatives

So far, this section assumed citizens should participate in decisions affecting them, with the only question concerning who should participate, addressing exclusionary practices around

age and gender. However, there is a deeper question in citizenship theory which needs to be asked of CEC, do they portray citizens as participating in decisions affecting them? (*yes/no*) if so, to what extent? (*more/less*). Answers to these question will help illuminate underlying positions regarding a key citizenship debate, direct versus indirect democracy, otherwise known as participative versus representative government, which in turn, indicates whether the goal of shaping participative citizens (as is the case in all three countries, demonstrated in Section 6.2), is a democratic and politically contextualised goal, or whether assertions of representative government and absences of notions of participative government, suggest the otherwise.

This section essentially asks, what form of government is portrayed and justified in the countries' CEC, representative and indirect or participative and direct, as who is portrayed as participating in government and democracy matters. In particular, the question of whether the citizen participates directly in GPD, or whether a representative does so on their behalf, is crucial, and indicates the type of ideal system of government, a country seeks to justify and foster. In a representative system of government, the citizen's role is generally limited to traditional forms of engagement such as voting and party memberships. While participatory forms of government encourage involvement in government policy making beyond narrow forms.

Some earlier syllabi made clear reference to participatory democracy, for example in Wales's *Community Understanding* (CCW, 1991), in a section entitled "Participation in Decision-Making", we were told that:

Power and authority and therefore decision-making, operate at a number of levels: the family, the classroom, the school, local government, national government and internationally through such agencies as the United Nations. (1991:8)

And that "Pupils need to examine how these processes work and be aware of the part they can play as individuals" (1991:8). It is further explained that:

Wales is part of the community of democratic nations; therefore, pupils should understand what democracy means in practice and how a democratic political system

works. They will need to acquire the knowledge and skills that will permit them to participate fully in decision-making processes. (CCW, 1991:8)

This description of participation in decision-making, is clearly contextualised politically, and reflecting a participative understating of democracy. *PSE* (WAG, 2008:18) too, presented a participative model of democratic government, which required students understand “the importance of democratic decision making”, the “principles of democracy in Wales, the UK and the EU” (WAG, 2008:20), “opportunities to participate in the democratic process locally, nationally and internationally” (WAG, 2008:24), and “the importance of participating in democratic elections and the links between political decisions and their own lives” (WAG, 2008:22). More specifically student were told to “take part in debates and vote on issue[s]” These statements are unambiguous in calling for participation, but conceive of political participation narrowly as voting, though the phrase “participating in democratic elections” could theoretically cover, campaigning, running for office, and generally wider conceptions of participation. Ultimately however, the context for this participation is representative government, and not full participation of citizens in the democracy.

Most recently however in *Humanities AOLE* (WG, 2019), phrases such as “exercising their democratic rights and responsibilities” (WG, 2019:8) and “consider the impact of their actions when making choices and exercising their democratic rights and responsibilities”, imply participative democracy. However, no clear statements are provided that indicate a preference for participative democracy, nor is there anything that clearly portrays this form of government. In fact, the ‘listed’ nature of the syllabus, as alluded to earlier, tends to allow all possibilities, through lack of detail. Additionally, the vast majority of references to “participation” explicitly, tend to be socially interpreted, seeking to cultivate specifically and repeatedly, “social action” (WG, 2019:08,15, 31,70,76,77,78,79and80)

Early in Wales’s extended provision, *Developing Curriculum Cymreig* (ACCAC, 2003) gave little away, except to establish that pre-age eleven, students learn about, “the democratic decision-making process” and where after eleven:

...they focus on practical involvement in the community, specific knowledge about democratic systems and the development of a sense of personal responsibility towards the environment and to sustainable development. (ACCAC, 2003:11)

ESGDGC (WAG, 2008b), similarly but vaguely, called for improvements in “political literacy” (2008b:12), and for the students to understand “the links between political decisions and their own lives • and how to influence political decisions” (2008b:42). Similarly, students were to know “the principles of democracy” but crucially, also be given opportunities to “participate in democratic elections and • consultation processes” (2008b:42). Though these are again narrowly conceived forms that underpin representative models of government and democracy, and while government is addressed frequently, its nature remained generally unelaborated.

A similar position was consolidated in *Unity and Diversity* (WAG, 2010), which, whilst requiring “Political ideas such as resistance, human rights, democracy and equality should be explicitly taught with opportunities to challenge bias and evaluate sources from different perspectives...” (2010:5), also called for students to “Participate in debate, democratic elections and consultation processes.” – again narrow, and again indicative of representative forms of governance and democracy.

In Wales then, earlier curricula clearly promoted a participative, politically contextualised view of democracy, encouraging pupils to understand and take part in decision-making, but participation was largely framed through a representative understanding of democracy, such as voting, debate, and consultation. More recent curricula imply democratic participation yet are increasingly vague and socially oriented, offering little explicit commitment to participative democracy beyond representative models of government.

More firmly representative throughout however, Ghana’s *Social Studies* (CPDD, 2007:8) narrowly conceived of political participation as “voting during elections”, and whilst explaining democracy, omits clarification of whether Ghana is premised on a representative or participative democratic structure, though mentioning “political parties” and “free and fair elections” (2007:36) and deficiencies of “political representation” for some groups (2007:8) suggest the former. In 2020’s syllabus, students were still required to “Explain the concepts of democracy and election” (CPDD, 2020:95) and “explain political stability” (2020:99), where political stability, mentioned sixteen times, appeared to be the central purpose of the GPD content in that syllabus, which is quite extensive, and permits examination of government systems, but broadly, makes little distinction between representative and participative government and democracy. By 2024, This picture had consolidated, and GPD content

broadly scaled back, though students were then instructed to “create posters describing the political systems in pre-colonial Ghana.” (2024:15) as well as to “examine the nature of modern political institutions in Ghana” (2024:16).

Singapore, as has been demonstrated, consistently sought to shape participative citizens, as a syllabus aim and DOE, and whilst this once included political conceptions, such efforts are invariably socially contextualised. Take for example these earlier politically contextualised examples of direct democracy:

Citizenship education is a subject that aims at producing competent, reflective, concerned, and participatory citizens who will contribute to the development of the communities and country in the spirit of patriotism and democracy (2007:ii)

And:

Citizenship Education covers the child's role as an effective and participatory member of the democratic political community...[and]...active participation in the public life and community (2007:ii)

and also, that they “participate in decision-making” (2007:13, 24and27) specifically “...at home and in school e.g. voting during school elections” (2007:13) but also that students should challenge the notion that “Females are not permitted to effectively participate in decision making even if it affects them, etc.” (2007:28). The syllabus, extensively addressed notions of government, stating “people participate in decision-making” but also that “people choose their own leaders to rule them” and that “leaders rule according to the Constitution and other laws of the nation, etc.”, clearly indicative of representative models, which additional narrow expressions of political participation support, including mentioning voting six times.

In *Our World Our People* (NCCA, 2019) the government continued to be presented as representative, again via narrow conceptions of political participation, this time set in the context of the democratic school, where, “Learners discuss the features of democratic governance in Ghana e.g. tolerance, election of leaders, transparency.” (2019:59). More clearly preparing students for Ghana's representative system, are references to mock class

elections (2019:39and59) in which “Learners demonstrate how to elect a leader in a democratic way” (2019:59).

Across successive Singaporean CEC (2005-2024), political participation has been narrowly framed, largely equated with voting and elections, implicitly orienting students toward a representative democratic model, with growing emphasis on political stability and reduced participatory scope. Meanwhile the Singaporean CEC frequently addressed participative citizenship but prioritized socially contextualised, limited, and predominantly representative forms of democratic engagement. Singapore was the only country of the three to explicitly clarify its system of government as representative (2005:12), although the Welsh CEC did address democratic representatives sporadically.

Additionally, this knowledge became a central aim of the syllabus, where students were “To know the system of government and the principles of good governance” (2005:2). However, in 2014 politics and democracy were mentioned just once each, voting not at all, and the clarification regarding representative systems of government was omitted. Whilst government was referenced regularly, it was routinely presented as a separate to citizens, Singaporeans and indeed migrants, as shown in the following example:

...students will explore the roles played by Singaporeans, the government and migrants in creating a sense ...” (2014:26)

This approach was continued into the 2020 and 2023 syllabi, both of which mentioned politics and democracy just once each, and where both continued to omit specific clarification of Singapore as a representative democracy. Government continued to be portrayed as something separate from the citizens, with this continuing to be the case today in Singapore’s *Social Studies* (CPDD, 2024). No indications of a desired participatory democracy, coupled with clear statements confirming Singapore’s representative system, amount to a clear suggestion that citizens should not generally participate in democracy beyond limited and narrow forms, namely voting - conducive with models of representative government. As GPD content also faded, we can conclude participation in GPD is being encouraged less over time.

In Singapore's extended provision (2007a) we saw a very different picture where *Citizenship Education* (CRDD, 2007:32), that indicated a wider understanding of what constitutes citizen participation in democracy:

His [sic] knowledge will enable citizens to participate effectively in the democratic process e.g. when voting, and empower them to play a more active and meaningful role in the way Singapore is governed.

Perhaps revealing a tension however, that very syllabus also maintained a position that the roles of government and that of the citizen are separate (2007a:32), where the government is provider, not participative partner. This view is maintained throughout their extended provision, where GPD is barely mentioned at all. However, the earlier evidence does point to representative over participatory democratic influences.

In summary, in Ghana, there has been a consistent and unbroken view of government as representative. This has also been the case in Singapore, and whilst some earlier syllabi in Wales included discourses of participatory democracy, this has now broadly subsided. Before concluding this section fully, the chapter must address another key indicator of whether CEC seeks to foster a participatory or representative form of democracy, and that is the different usage of government and governance, as show in the next section.

6.4.4 Government versus Governance

Here government can generally be read as representing traditional understandings of power in democratic societies, exercised via the government itself, where the term governance is a broader concept that connotes a more participative view of power as a process in which participation should not be restricted. The latter is oft associated with theories of participatory democracy.

As highlighted earlier, in relation to the decision of whether to deploy the term “contribution” or “participation”, synonyms matter. A further example of this, explored here for its capacity to reveal participatory and representative understandings of democracy, is the difference between government and governance, where government is the formal legal institution that

societies enable to govern on their behalf, but where governance refers to a broader processes and systems of governing that are not necessarily restricted to the actions of government. The former reflecting traditional representative understandings of democracy, while the latter reflects more democratic, flexible, and even temporary arrangements, aligned with participatory approaches.

Whilst the following ratios are taken from the data table at the beginning of the chapter, their presentation here, as ratios, is to represent the scale of the differences between syllabi. In Ghana, the core provision (social studies) analysed, presented a ratio of the terms, government to governance, as 27:9 in 2005, 16:0 in 2020, to 6:0 in 2024. Meanwhile their extended provision, namely *Citizenship Education* (CRDD, 2007a) also favoured the term governance to government by a ratio of 25:18, though this ration altered significantly in 2019 to 12:0 in the syllabus's replacement *Our World Our People* (NCCA, 2019). In Singapore's core provision (also social studies), the syllabi presented a ratio of government to governance, as 13:3 in 2005, 9:0 in 2014, 42:0 in 2020, 7:0 in 2020, and finally 4:0 in 2024. Singapore's extended provision similarly registered ratios of 6:0 in 2007, 1:0 in 2014, and finally 0:0 in 2021. What we are seeing in both Ghana and Singapore, is a reduction of focus generally on government/governance, but also importantly, a universal disappearing of the term governance, and with it arguably, the possibilities of creating and fostering a participative citizenry. In Wales, the ratios of government to governance, in their core provision (mixed), was recorded as 2:0 in 1991, 9:0 in 2008, and 4:3 in 2019. In their extended provision, they recorded 6:0 in 2003, 15:1 in 2008a, 26:1 in 2009, and 19:2 in 2010. Despite general increases in the use of the term government in the country's CEC, we also see a clear emergence of the term governance, particularly in the country's extended provision from 2008. More tellingly, the country's most recent CEC intervention, a *Humanities AOLE* (WG, 2019), actually mentioned government to governance at a ratio of four to three. What this simple analysis demonstrates, is that the countries portrayals of power and democracy are diverging at least regarding terminological preferences (government versus governance).

This section shows how the curricula have imagined power, whether it has been framed as fixed or fluid, centralised or diffused, representative or participatory. The following section addresses 'active citizenship' which shows how learners are expected to act within that imagined system.

6.5 Active citizenship

The concept of active citizenship has emerged strongly, and its usage intensified in Ghana, Singapore, and Wales, broadly aligning with Dalton's claim that "Citizenship norms are shifting from a pattern of duty-based citizenship to engaged citizenship" (Dalton 2008:77/78). However, while all three countries now emphasise active citizenship, they do so in primarily social and community-oriented terms, as opposed to political and democratically participative terms participation.

In Ghana, explicit references to active citizenship were absent in *Social Studies* (CRDD, 2007). However, *Citizenship Education* (CRDD, 2007a) stated that selected issues were intended to "promote the child's active participation in the public life and community issues in an informed, committed and constructive manner, with a focus on the common good" (2007a:ii). This reflects a mixed position in Ghana's CEC, as instituted in 2007.

A significant transition occurred in 2020's revised *Social Studies* (NaCCA, 2020) syllabus, where active citizenship became a prominent organising principle, embedded in key syllabus mechanisms. The syllabus aimed to develop learners who "put country and service foremost through an understanding of what it means to be active citizens" (2020:xxvii), and to produce "character-minded learners who can play active roles in dealing with the increasing challenges facing Ghana and the global society" (2020:viii). The rationale and philosophy reinforced this orientation, seeking to equip learners to become "active, informed, innovative and responsible citizens" (2020:xi) and "reflective, concerned, active and participatory" contributors to society (2020:xii). This framing was retained in *Social Studies* (NaCCA, 2024), repeating identical language in the introduction, rationale, and philosophy (2024:ix; 2024:xi; 2024:xii). Despite this stronger emphasis in the country's core provision, in their extended provision's, *Our World Our People* (NCCA, 2019), active citizens were defined as those who "contribute to the well-being of his or her community" (2019:16), suggesting active citizenship in Ghana is predominantly conceived in communitarian, rather than civic republican, or more broadly, political terms.

In Singapore, a gradual but deliberate transition toward active citizenship is clearly visible in *Social Studies*. Curriculum aims evolved from encouraging students to "appreciate issues of societal concern" (2005; 2012) to "be motivated to engage in issues of societal concern"

(2020; 2023). Similarly, “appreciate the importance of engaging” (2014:5) was replaced by “be motivated to engage” (2020:5). A key change came in 2020, when National Education dispositions were embedded explicitly into the *Social Studies* (CPDD, 2020) syllabus, including “a sense of reality”, “a sense of belonging”, “a sense of hope”, and critically, “the will to act” (CPDD, 2020:8). The phrase “the will to act” appeared sixteen times and was applied across domains such as multiculturalism, migration, peacebuilding, being part of a globalised world, environmental protection, and nation-building (2020:31–37). This suggests Singapore is attempting to stimulate citizen action in all facets of Singaporean life and society, both within, and beyond Singapore. *Civics and Moral Education* (CPDD, 2007) supported this approach through a focus on moral knowing, reasoning, and moral action, and by defining active citizenship as “playing one’s part in ensuring the well-being of the nation” (2007:9). In the syllabus’s replacement, *Character and Citizenship Education* (SDCD, 2014), “Active community life” was incorporated as a core civic outcome (2014:4). While these developments indicate a strong commitment to action and participation, they are consistently channelled into social cohesion, community well-being, and nation building, rather than political engagement.

In Wales, active citizenship was found in the earliest syllabus analysed as an explicit curriculum goal. *Community Understanding* (CCW, 1991) required pupils to “take an active and meaningful part in the life of their communities” (1991:3) and included a full component dedicated to active citizenship. This orientation persisted through successive reforms, notably in *Personal and Social Education* (WAG, 2008), where active citizenship was defined as participation “in community life through service and action which promotes the well-being of that community” (2008:14). More recently in *Humanities AOLE* (WG, 2019), active citizenship became one of six core themes, extensively elaborated (2019:11), with the term “social action” appearing at least twenty-five times. Despite this prominence, the emphasis again lies on social action and community engagement rather than direct political participation.

In conclusion, Ghana, Singapore, and Wales, have all embraced active citizenship as an educational ideal, but have largely depoliticised it. Active citizenship is consistently framed as social engagement, community contribution, and responsible action, while active political participation, once more directly encouraged, now plays less of a role. The following section covers a key issue that this research seeks to understand, postnational citizenship. More

specifically it examines how CEC have been contextually or explicitly situated locally, nationally, or globally, illustrating a broad trend away from restricted localised conceptions of citizen participation, towards more globally focussed understandings, reflecting Postnational positions.

6.6 Scales of Participation (Local/National/Global)

This section examines the changing scales at which Ghana, Singapore, and Wales have sought to foster citizen participation. Whilst further sub-categorisation of scales is possible (sub-national, continental (regional)) the general local-national-global framework guides the following discussion.

In Ancient Greece, arguably the earliest citizens, were citizens in large part because they participated in society, however determined. This was necessarily a localised enterprise pre-Westphalia world system of nation states, and significantly prior to globalised notions of citizenship. However, as demonstrated in Chapter Two, the institution of citizenship itself has developed from the local, to the national, to the global. This journey is in part reflected in the changes between syllabi examined in this study.

In Ghana, *Social Studies* (CRDD, 2007) only addressed local and national citizen participation. For example, a unit aim sought to “develop positive attitudes and values for contributing to nation building” (CRDD, 2007:4) in students, who were also encouraged to “contribute to social programmes of their community and of the country etc.” (CRDD, 2007:30), and where values of a good citizen are listed, one of which is “participation in community activities.” (CRDD, 2007:8). The only real reference to any kind of citizen participation at a global level, came in the odd pedagogical suggestion that:

Pupils brainstorm on what they as individuals can do to influence decision-making in foreign matters. (Use newspaper cuttings or readers’ letters to illustrate how individuals can participate in shaping foreign policy). (CRDD, 2007:24)

Otherwise, as the selection of examples above illustrates, this, the earliest of the Ghanaian syllabi analysed, conceived of citizen participation entirely in local (community) and national terms.

More recently, in Ghana, *Social Studies* (NaCCA, 2020:viii) surmised:

Ultimately, this will produce character-minded learners who can play active roles in dealing with the increasing challenges facing Ghana and the global society. (NaCCA, 2020:viii)

In this syllabus we can see that Ghana seeks to shape future citizens to be active at several levels. Firstly, they are to serve the family and community, and to volunteer (NaCCA, 2020:57), but also that they will “contribute meaningfully towards the socio-economic development of the country” (NaCCA, 2020:xxvii). Service to the nation is “foremost” (2020:xxvii) to the Ghanaian citizen, where commitment is defined as “the determination to contribute to national development” (NaCCA, 2020:xvi). However, this syllabus marks a distinct transition, as these messages are contained within the definition of the core competency *Cultural Identity and Global Citizenship*, which also encouraged students to “contribute to the global community.” (NaCCA, 2020:xxvii). In 2024, the syllabus’s most recent revision retained these statements (NaCCA, 2024:xv and xxvi)

The same transition was discernible in the country’s extended provision, where at the beginning of the *Our World Our People* (NCCA, 2019), in core competency “cultural identity and global citizenship” (2019:vi) which covers most forms of participation, it is again explicitly stated that citizens should “contribute to the global community” (2019:vi). Again, however, it still includes the caveat, that learners, “...put country and service as foremost through an understanding of what it means to be active citizens.” (2019:vi)

This was not the case in the syllabus it replaced, *Citizenship Education* (CRDD, 2007a:39), where the only mention of global was not related to participation, and the equivalent core competency, requested students “contribute to national development” (2007a:19) and “the development of the country” (2007a:33), where “commitment was defined as “determination to contribute to national development.” (2007a:vi) and where even the rationale stated:

Citizenship education is a subject that aims at producing competent, reflective, concerned, and participatory citizens who will contribute to the development of the communities and country in the spirit of patriotism and democracy (2007:ii)

Ghana's CEC has developed from an earlier focus on citizen participation as primarily local and national, to a more recent framework that still prioritises service to the nation but increasingly acknowledges citizens' roles in contributing to the global community, while ensuring national interests continue to be prioritised.

A clear transition can also be discerned in Singapore's CEC, where the concept of citizen participation has expanded from a largely localised, community-based activity, into a multilevel requirement encompassing global engagement. In *Social Studies* (CPDD, 2005), participation appears only once, listed as a value and contextualised at the community level. As the text is never returned to, participation is implied as local and bounded, with little conceptual development beyond immediate community involvement. By *Social Studies* (CPDD, 2014), participation became more explicit and multilevel. The syllabus philosophy described students as "informed, concerned and participative citizens competent in decision-making with an impassioned spirit to contribute responsibly to the world they live in." (2014:4). Whilst the syllabus aim was more locally focussed "As *participative* citizens, students would be resilient in addressing concerns of the community or society in spite of challenges faced" (2014:5, italics in original) further on the syllabus expresses what could be considered a multilayered view of citizen participation through the description of participative citizens as those who act "...meaningfully towards the community, are committed to nation-building, and who effect a positive change in the world" (2014:7).

This expansion was made structurally explicit in *Social Studies* (CPDD, 2020). Alongside the familiar formulation of participative citizenship (2020:4), which are broadly social, the syllabus introduces Issue 5A, "Being part of a Globalised World," asking, "How can we participate in a globalised world?" (2020:11, 25), and explaining "This will guide them in making well-reasoned and responsible decisions as informed, concerned, and participative citizens in a globalised world" (2020:25). The syllabus adds studying this issue, will "enable them to participate sensibly in a globalised world." (2020:27 and 36). Here then, participation is no longer only community based, or nationally framed, but also global, requiring engagement with the world beyond national boundaries.

The 2023 and 2024 syllabi consolidated this trajectory, both reiterating participation as responsibility to “the society and the world they live in” (SDCD, 2023:2, SDCD, 2024:4). However, whilst the subsection “How can we participate in a globalised world” (SDCD, 2023:11,25and35) was retained in 2023, where it is stated, “The study of this Issue will provide students with the skills and habits necessary to enable them to participate sensibly in a globalised world.” (SDCD, 2023:19), this was omitted in the country’s most recent syllabus analysed from 2024, in which a strong global perspective to citizen participation was developed and consolidated.

Parallel developments presented in, *Civic and Moral Education* (CRDD, 2007) and *Character and Citizenship Education* (SDCD, 2014 and 2021). Early emphases on school and community-based participation (CRDD, 2007:46) was complemented by questions such as “How can we be caring members of the global community?” (CRDD, 2007:50), suggesting students can become:

... involved in humanitarian efforts to improve the well-being of others in the international community, such as taking part in overseas volunteer programmes and being involved in fund raising for the needy in other countries (CRDD, 2007:50),

However, *Character and Citizenship Education* (SDCD, 2014) localised its framing of citizen participation, for example describing “Preparing for and participating in camps” (SDCD, 2014:14) and “Participating in family outings” (SDCD, 2014:16). Ultimately however, the syllabus is organized by domain (local, national global etc.) and addresses participation directly or indirectly in each. Participation in school activities was a big focus in this syllabus but grew to become an even bigger focus in the later *Character and Citizenship Education* (SDCD, 2021), continuing to anchor participation in school practices (SDCD, 2021:17-18), while treating the school as a proxy for society, preparing students for wider civic and global participation. In summary, while a strong community focus to participation exists in Singapore, primarily via school based and community-based activity, a discourse of global participation did emerge (2020), develop (2023) but disappear (2024), suggesting perhaps a walking back of such an outlook and related content.

Across the Welsh CEC, citizen participation evolved early and consistently as a multi-layered concept, progressing from community-based engagement to explicit local, national, and

global participation. Unsurprisingly perhaps, *Community Understanding* (CCW, 1991) sought to foster community participation, instructing that “Pupils should be aware of the diversity of races, faiths and languages, within Wales and beyond, and how they contribute to community life” (1991:9). However, participation was already framed beyond the immediate locality, in this 1991 syllabus. Pupils were expected to contribute as “active, participating, critically reflective members of their communities in Wales, or wherever they may subsequently live.” (1991:2, 9), suggesting cosmopolitan influences. Crucially, the syllabus situates participation within overlapping scales of levels “the family, the classroom, the school, local government, national government and internationally through such agencies as the United Nations.” (1991:8), suggesting communitarian influences. This signals an early communitarian–cosmopolitan synthesis, where civic action is embedded across scales.

This multilevel orientation became explicit and repeated in *PSE* (WAG, 2008). Learners were to be empowered to “participate in their schools and communities as active responsible citizens locally, nationally and globally” (2008:8), and “acquire the skills, values and knowledge that equips them to participate in decision-making within their communities, locally, nationally and globally.” (2008:8). Several other examples, included below, illustrate the breadth with which the multilevel view was inculcated into the syllabus.

Learners are members of communities, from local through national to global, and can be helped to play a meaningful and active part in them (2008:11)

.... participate in individual and collective decision-making, both locally and globally, that will improve the quality of life now without damaging the planet for the future (2008:14)

... participate within their communities as active citizens in the twenty-first century. (2008:17)

... participate for the benefit of their communities both locally and globally. (2008:17)

... participate in school and the wider community (2008:20)

... participate in decision-making, both locally and nationally (2008:22)

... participate in the democratic process locally, nationally and Internationally (2008:24)

Most recently a multilevel view of citizenship participation has been firmly consolidated within the *Humanities AOLE* (WG, 2019) which aims to:

...enable learners to take committed social action as caring, participative citizens of their local, national and global communities (2019:8)

This multiscale worldview permeates the *Humanities AOLE* (WG, 2019) syllabus, albeit in the form of the repeated lexical grouping of the terms local, national, and global, which, while clearly indicating a multilevel conception of citizenship (Yuval-Davies, 1997), could be criticised for lacking substance. More specifically however, the quote above is unambiguously multilevel, the Ideal type Welsh citizen, should participate, via committed social action, in their local, national, and global communities. Participation was operationalised through repeated expectations to “plan, participate in and evaluate their social action... locally, nationally and globally” (2019:79-80). Learners were also positioned as “ethical global citizens” whose participation included social, political, economic, and environmental action (2019:70). The country’s extended provision reinforced this pattern. *Developing the Curriculum Cymreig* (ACCAC, 2003) stressed “participation locally, nationally and globally” (2003:12) alongside international links, while *ESDGC* (WAG, 2008a) and *Wales Europe and the World* (WAG, 2009) explicitly aligned participation with global issues. Even where participation appeared school-centred, as in *Unity and Diversity* (WAG, 2010), it was framed as preparation for engagement “in their local community and beyond.” (2010:23). Overall, the Welsh CEC demonstrated a longstanding and increasingly structured expansion of participation, from community involvement to sustained civic action across interconnected local, national, and global domains.

In all three countries’ CEC, a transition could be seen from a sole focus on local participation toward multi-level engagement, but with different degrees of consolidation. Ghana presented a cautious expansion, where global participation is now recognised, yet firmly subordinated to service to the nation, where in Singapore, global participation was introduced and briefly

developed, but later curtailed, leaving participation anchored in school and community contexts. Wales, by contrast, embedded participation early and consistently across local, national, and global scales, culminating in an explicit expectation of civic and social action at all levels.

6.7 Chapter Conclusions

This chapter has demonstrated that across Ghana, Singapore, and Wales, participation has been an increasingly emphasised dimension of CEC, though the concept's treatment is neither uniform nor linear. Quantitatively, total mentions per syllabus (TMS) and expanding use of Key Syllabus Mechanisms suggest that participation has gained structural importance over time, particularly in core provisions. Despite references per page (RPP) declining, participation was more frequently positioned as a rationale, syllabus aim, or organising principle, indicating a strengthening of intent among curriculum makers. In this sense, participation is broadly gaining curricular presence and emphasis across all three cases.

However, closer qualitative readings reveal a parallel and arguably more consequential transition, while participation is increasingly emphasised, its meaning is changing. The three countries' CEC appear to be converging around a predominantly social conception of participation, emphasising community involvement, social responsibility, cohesion, and, in Singapore and Wales at least, social action. In Ghana, participation has become more consistently framed as communal contribution and nation-building. In Singapore, participative citizenship is now closely tied to social action, moral development, and community engagement, also deploying experiential learning to that effect, while remaining carefully distanced from discourses of political participation. In Wales, a long-standing commitment to participation has culminated in an explicit framing of citizenship as committed social action across local, national, and global communities.

At the same time, political participation has weakened across all three contexts. Earlier syllabi in Ghana, Singapore, and Wales explicitly linked political knowledge to participation in government, democracy, and decision-making. Contemporary CEC, by contrast, largely retain political education as descriptive or contextual knowledge, while decoupling it from participatory practice. Where participation is encouraged, it is rarely tied to formal politics,

and more often redirected through school-based decision-making or generalised rights discourse. The politically participative citizen, once more visible, is now marginal.

Taken together, the findings point to partial curriculum convergence, where participation is increasingly central to citizenship education, but is also increasingly understood socially rather than politically. This convergence reflects a broader depoliticisation of citizenship education, where engagement, action, and responsibility are valued, yet largely situated outside formal democratic participation, a finding that aligns again with many Asian countries' curricula (Lee, 2003). The next chapter now presents a mixed method analysis of the citizenship dimension *identity and belonging* in the countries CEC.

Chapter Seven: From Monocultural to Multicultural and From Singular to Multiple Identities

7.1 Introduction and Chapter Structure

Many have posited that globalisation, as premised in Gramsci's theory of hegemony, (Mouffe, 2014), leads to cultural assimilation (Berry, 2008:328, Sanchez, 2010:71, Awashreh and Ghanaimi, 2024:5906), with supranational bodies such as the UN, catalysing the spread of Western culture and social organisation (Awashreh and Ghanaimi, 2024:5906), to the detriment, and possible death of localised, and even national cultures. Others, however, have argued this is not a true reflection of what "accelerated globalisation" (Tomlinson, 2007:410, Tuncer, 2023:87) has brought with it, and that, in fact, local and national cultural identities can be resilient in the face of globalisation (Schuster and Solomos, 2002:12, Ricupero, 2008:129).

As discussed in Chapter Two, a third way of thinking about globalisation's impact on local and national communities, their culture and identity is the notion of *Glocalization*, defined by Ritzer (2003) as "the interpenetration of the global and the local" (2003:193). This perspective argues the dichotomy between assimilative and integrative is false, and that, globalisation doesn't inevitably produce "economic, political, institutional, and... most importantly, cultural homogeneity" (2003:193) but rather that processes of globalisation

interact with conditions, agendas, and ways of organising socially and politically, at local and national levels, leading to unique forms of hybridisation. As Ang observed:

... the more global the world becomes, the more insistent particular differences, especially of the nationalist kind, are being articulated around the world...” (Ang, 2014:10).

At the cultural level, globalisation is understood to produce both integrative multiculturalism, often described as the “salad bowl” model, and cultural assimilation (Berray, 2019) more commonly known by the metaphor, the melting pot. Perceived threats to local cultures have contributed to their increased recognition through activism and legislation. A question then emerges, is this reflected in CEC. In addition to this longstanding dichotomy, contemporary citizenship studies increasingly point to an emergent focus on self-identity, as some have argued, as an expression of global citizenship, and more specifically, a global competencies approach (Dill, 2013:4).

Perhaps timely then, a concept has now emerged, that seeks in a way, to incorporate the proliferation of identity types that now characterise debate, and as this chapter will illustrate CEC in Ghana, Singapore, and Wales. This form of identity has been called “multiple identities” (Ross, 2007:4), as well as multilevel identities, and essentially reflects the idea that contemporary citizens’ identities are constituted by multiple influences, both within, and increasingly beyond the nation’s borders. This represents a shift from monocultural, nationally oriented models, toward more complex identity configurations. While resurgent national and cultural identities may be interpreted as defensive responses to globalisation, self-identity reflects its more enabling dimensions.

This chapter begins by situating identity and belonging within debates on globalisation and citizenship, outlining its theoretical framing and analytical approach (7.1). It then presents a quantitative analysis of trends in references to identity and belonging across the three countries’ CEC, including their embedding within key syllabus mechanisms (7.2.3). The chapter subsequently develops a mixed-method analysis that examines the emergence of multilevel citizenship identities, focusing in turn on global identity (7.3.2), national identity (7.3.3), cultural identity (7.3.4), self and social identities (7.3.5), and the consolidation of

multiple identity frameworks (7.3.6), before concluding with a synthesis of the key findings and their implications for contemporary citizenship education (7.4).

7.2 Shaping Citizens' Identity and Belonging: A Quantitative Analysis

7.2.1 Introduction

The quantitative analysis described in this Chapter was twofold. Firstly, as with the previous findings' chapters, a basic content analysis of key terms (identity and belonging) is presented. Unlike the previous two chapters, no synonyms were included in the analysis, fundamentally as none were identified as suitable. Therefore, the TMS figures for this dimension of citizenship, entitled *identity and belonging*, simply reflect the number of times the word *identity* was mentioned and the number of times the word *belonging* was mentioned in the same syllabus. RPP values were calculated the same way (TMS/no. of pages in syllabus). TMS and RPP figures have again been tabularised (Table 7.1) and illustrated graphically (Figures 7.1 and 7.2)

A further difference with the previous findings chapters is that they included sections comparing key ideas. In Chapter Five, this took the form of a rights versus responsibilities analysis. In Chapter Six, it focussed on the different synonyms employed, specifically, contribution and participation. In this chapter, no such comparison was required. The two terms examined, *identity* and *belonging*, were deemed for the purpose of this study, indicative of the same concept, and closely related enough not to warrant a comparison between the two. Using both terms together was considered the most effective way to capture all relevant material associated with the broader citizenship dimension *Identity and Belonging*.

Finally, as with the previous two chapters, innovative Key Syllabus Mechanism (KSM) analysis was also performed. Collectively, the quantitative analysis revealed a universal

growth in emphasis on the citizenship dimension *Identity and Belonging*, as the remainder of this section demonstrates.

7.2.2 Identity and Belonging: A Growing Emphasis

Table 7.1 and figures 7.1 and 7.2 below, show a growing curricula emphasis on the citizenship dimension *identity and belonging*. With only a few exceptions, both TMS and RPP figures have risen steadily. In every case, the most recent syllabus in each provision recorded higher TMS and RPP figures than the earliest, often with substantial growth.

Table 7.1 References to the Citizenship Dimension *Identity and Belonging*

	No. of Pages	<i>Identity Mentions</i>	<i>Belonging Mentions</i>	Total Mentions per Syllabus (TMS)	Dimension References per Page (RPP) [to 2dp]
Ghana					
<i>Core provision</i>					
JHS Social Studies 2007	51	3	1	4	0.08
JHS Social Studies 2020	158	24	17	41	0.26
JHS Social Studies 2024	129	43	6	49	0.38
<i>Extended provision</i>					
Citizenship Education (2007)	44	5	12	17	0.39
Our World Our People (2019)	82	57	4	61	0.74
Singapore					
<i>Core provision</i>					
Social Studies (2005)	19	1	1	2	0.11
Social Studies (2014)	49	13	1	14	0.29
Social Studies (2020)	57	17	17	34	0.60
Social Studies (2023)	32	2	3	5	0.16
Social Studies (2024)	48	9	4	13	0.27
<i>Extended provision</i>					
Civics and Moral Education (2007)	71	6	8	14	0.20

Character and Citizenship Education (2014)	60	56	8	64	1.07
Character and Citizenship Education (2021)	34	27	11	38	1.12
Wales					
<i>Core provision</i>					
Community Understanding (1991)	19	2	1	3	0.16
PSE (2008)	36	6	0	6	0.17
Humanities AOLE (2019)	84	27	9	36	0.43
<i>Extended provision</i>					
Developing Curriculum Cymreig (2003)	66	7	6	13	0.20
ESDGC (2008a)	54	14	0	14	0.26
Wales Europe and the World (2009)	52	6	0	6	0.12
Unity and Diversity (2010)	67	41	16	57	0.85

Figure 7.1 Total Mentions per Syllabus (TMS) of *Identity and Belonging*.

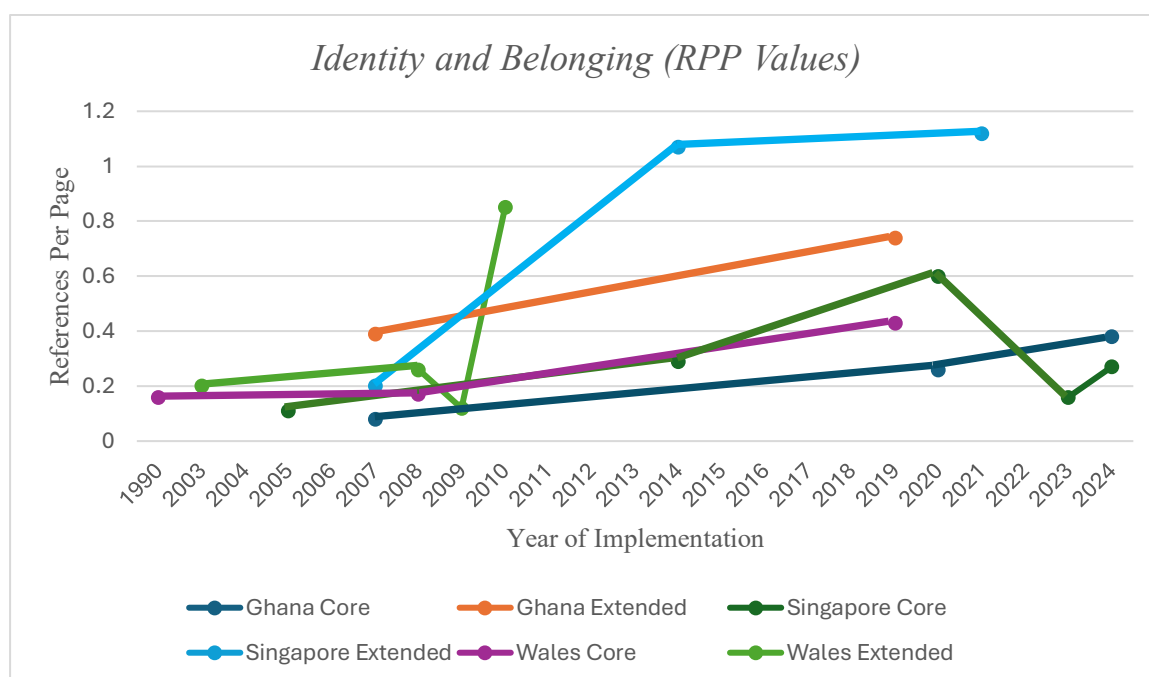
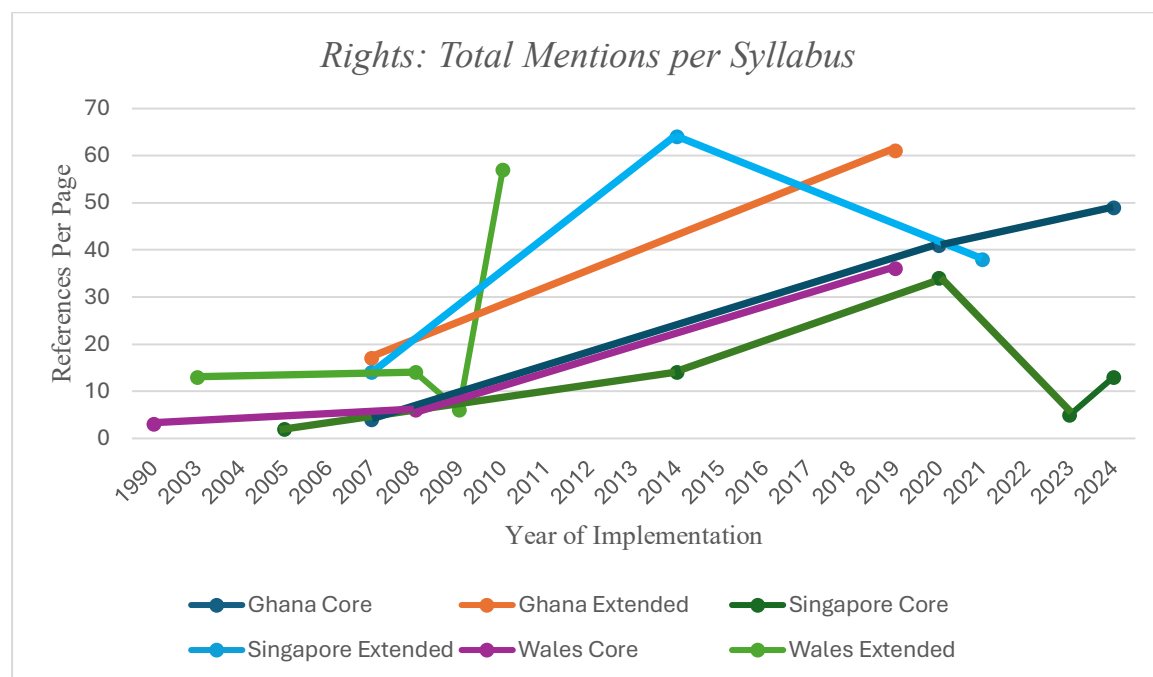


Figure 7.2 Average References Per Page (RPP) of *Identity and Belonging*



References to identity grew steadily in Ghana's core provision, from a negligible 0.08 RPP in 2007 to 0.26 in 2020, to 0.38 in 2024. TMS also rose from four, to 41, to 49, in 2007, 2020, and 2024, respectively. The country's extended provision completed a coherent pattern of growth, with RPP rising from 0.39 in 2007 to 0.74 in 2019, and TMS rising significantly from 17 in 2007 to 61 in 2019.

Similar growth presented in Singapore, where the country's core provision's RPP rose significantly from 0.11 in 2005, to 0.29 in 2014, to 0.60 in 2020 (a figure more than five times that of 2005), before falling to 0.16 in 2023, and recovering to 0.27 in 2024. TMS figures also grew from just two (2005) to 14 (2014), to 34 (2020) (a figure nearly three times as large as 2014 and 17 times larger than 2005), down to just five in 2023, before rising to 13 in 2024. While Singapore's core provision loosely mirrored a bell curve distribution, their extended provision presented a more coherent pattern of growth, recording 0.20 RPP in 2007, 1.07 in 2014, and 1.12 in 2021 (a figure more than five times as large as 2007). Although TMS figures again mirrored a bell curve, but rose overall from 14 in 2007 to 38 in 2021, having spiked in 2014 at a substantial fifty-four. In summary Singapore presented overall growth in both TMS and RPP figures in both provisions (core and extended).

Strong growth also presented in Wales's core provision (0.16 RPP in 1991 and 0.17 in 2008, to 0.43 in 2019), reflecting a big jump in references to identity and belonging, from approximately once every five pages in 1991, to approximately once every two pages in 2019. This was a pattern borne out in the TMS figures also, where just three were recorded in 1991, doubled to six in 2008, before rising significantly to 36 in 2019. Wales's extended provision also recorded overall growth, from 0.20 RPP in 2003, to 0.26 in 2008, dropping to 0.12 in 2009, before rising again, substantially, to 0.85 in 2010. The TMS figures followed an identical pattern, rising from thirteen in 2003, to 14 in 2008, then falling to just six in 2009, before rising again to a substantial 57 in 2010.

What these figures, as well as the table and graphical illustrations above demonstrate, is overall growth, across all three countries, which often presented as strong and consistent. The rising curricular presence of the citizenship dimension *identity and belonging* was the clearest sign of convergence found among the countries CEC. As already established however, syllabus documents are a unique genre (Fairclough, 2003:17), with specific mechanisms, that serve to emphasise whichever concepts, ideas, or agendas, are incorporated within them. Subsequently, key syllabus mechanisms (KSMs) were once again analysed, this time for their inclusion or otherwise, of the terms identity and belonging. To reiterate, this is important, because placement in the KSMs signals intent. To use the focus of the previous chapter to justify this approach, a curriculum that includes, raising citizen participation, as a syllabus aim, is far more indicative of a government's intention to increase participation than one where the same objective appears only implicitly, such as within a case study or exemplar.

7.2.3 Emphasising Citizens' Identity and Belonging Using Key Syllabus Mechanisms (KSMs)

This Section presents an analysis of how identity and belonging have been included or omitted in the countries' KSMs over the study period. Tables 7.2-7.7 illustrate the presence (marked with an x) or absence (left blank) of the terms identity or belonging in countries' KSMs.

Table 7.2 KSMs featuring *Identity and Belonging* in Ghana's Core Provision

Syllabus Title > Syllabus Mechanism V	<i>Social Studies 2007</i>	<i>Social Studies 2020</i>	<i>Social Studies 2024</i>
SCOPE			
RATIONALE	X	X	X
SYLLABUS AIM[S]	X	X	X
UNIT AIM[S]			
SYLLABUS THEMES (in Title)		X	X
CORE CONCEPTS			
ATTITUDES and VALUES	X	X	X

Table 7.3 KSMs featuring *Identity and Belonging* in Ghana's Extended Provision

Syllabus Title > Syllabus Mechanism V	Citizenship Education 2007	Our World Our People 2019
SCOPE		
RATIONALE	X	X
SYLLABUS AIM[S]		X
UNIT AIM[S]	X	
SYLLABUS THEMES (in Title)		
CORE CONCEPTS		
ATTITUDES and VALUES		X

Table 7.4 KSMs featuring *Identity and Belonging* in Singapore's Core Provision

Syllabus Title > Syllabus Mechanism V	Social Studies 2005	Social Studies 2014	Social Studies 2020	Social Studies 2023	Social Studies 2024
SCOPE	X				
RATIONALE		X			
SYLLABUS AIM[S]		X	X	X	X
UNIT AIM[S]		X	X		X
SYLLABUS THEMES (in Title)		X			
CORE CONCEPTS		X	X		X
ATTITUDES and VALUES			X	X	X

Table 7.5 KSMs featuring *Identity and Belonging* in Singapore's Extended Provision

Syllabus Title > Syllabus Mechanism V	Civics and Moral Education 2007	Character and Citizenship Education 2014	Character and Citizenship Education 2021
SCOPE	X		
RATIONALE	X		
SYLLABUS AIM[S]	X	X	X
UNIT AIM[S]		X	
SYLLABUS THEMES (in Title)		X	X
CORE CONCEPTS		X	
ATTITUDES and VALUES	X	X	

Table 7.6 KSMS featuring *Identity and Belonging* in Wales's Core Provision

Syllabus Title > Syllabus Mechanism V	<i>Community Under- standing (1991)</i>	<i>PSE (2008b)</i>	<i>Humanities AOLE (2019)</i>
SCOPE			X
RATIONALE			X
SYLLABUS AIM[S]			X
UNIT AIM[S]			X
SYLLABUS THEMES (in Title)			
CORE CONCEPTS			
ATTITUDES and VALUES			

Table 7.7 KSMS featuring *Identity and Belonging* in Wales's Extended Provision

Syllabus Title > Syllabus Mechanism V	<i>Curriculum Cymreig (2003)</i>	<i>ESDGC (2008a)</i>	<i>Wales Europe and the World (2009)</i>	<i>Unity and Diversity (2010)</i>
SCOPE	X			
RATIONALE				X
SYLLABUS AIM[S]			X	
UNIT AIM[S]	X			
SYLLABUS THEMES (in Title)		X		
CORE CONCEPTS				
ATTITUDES and VALUES				

Ghana, Singapore, and Wales demonstrated contrasting approaches to embedding identity and belonging within the key syllabus mechanisms (KSMS) of the CEC analysed.

Ghana showed the strongest and most consistent use of KSMS for this purpose. Across all three *Social Studies* syllabi in 2007, 2020, and 2024 (core provision), identity and/or belonging were embedded in the rationale and syllabus aims, as well as in the attitudes and

values KSM. This already strong focus intensified in 2020 with the introduction of “Self-Identity” and “Culture and National Identity” as dedicated sub-strands (i.e. the KSM Syllabus Themes). Ghana’s extended provision similarly emphasised identity and belonging, with the terms appearing in the rationales of both the 2007 and 2019 syllabi, and occupying syllabus aims, and attitudes and values, in later iterations. Overall, Ghana’s core and extended provisions show an increasing use of KSMs to address issues of identity and belonging, over time.

Singapore presented a more variable trajectory. Its core provision embedded the terms’ identity and belonging sparingly within KSMs in 2005, but by 2014 expanded their inclusion across five KSMs and elevated identity to one of the “Three Big Ideas” underpinning the syllabus. In 2020, although identity and belonging were no longer present in the rationale or organising themes, they remained prominent in syllabus aims, unit aims, core concepts, and attitudes and values. Singapore’s extended provision followed a similar rise and partial contraction, from four KSMs in 2007 to five in 2014, declining to two in 2021, though retaining identity-focused syllabus aims and themes.

Wales contrasts sharply with both countries. Despite rises in TMS and RPP figures for identity and belonging in the Welsh CEC, few KSMs addressed identity and belonging until recently. A key change occurred with the launch of *Humanities AOLE* (WG, 2019), where these concepts appeared in the scope, rationale, syllabus aims, and unit aims, embedding the notions firmly within the syllabus structure, and suggesting identity and belonging, to now be a central focus of CEC in Wales. None of the Welsh syllabi analysed included the terms’ identity or belonging in more than one or two KSMs, and so their deployment in four, in *Humanities AOLE* (WG, 2019), marks a late but abrupt prioritisation of the concept.

7.2.4 Conclusions

Identity and belonging have become an increasingly important dimension of all three countries’ conceptions of citizenship, as determined by generally consistent growth in TMS and RPP figures as well as growing embeddedness of the concept in key syllabus mechanisms (KSM).

Across Ghana, Singapore, and Wales, references to identity and belonging increased overall in both core and extended CEC provisions, with Ghana showing the most consistent and sustained growth, Singapore displaying fluctuation alongside long-term expansion, and Wales demonstrating later but sharp increases, indicating convergence across all three systems in the rising curricular salience of identity and belonging. Additionally, the analysis illustrated differing but generally increasing use of key syllabus mechanisms (KSMs) to promote identity and belonging within citizenship education. Ghana demonstrates the strongest and most consistent emphasis. Both its main and Extended provisions regularly incorporated identity and belonging across rationales, aims, themes, competencies, and values, with a notable intensification from 2020 onwards through dedicated themes and competencies such as cultural identity and global citizenship. Singapore presents a more uneven pattern, with a clear expansion in its core provision by 2014, most prominently through the “Three Big Ideas” framework, followed by some retrenchment in 2020. Although identity and belonging remained embedded in aims, concepts, and values, Singapore’s extended provision similarly peaked in 2014 before declining in KSM usage by 2021. Wales contrasts with the other two countries in that identity and belonging only emerged relatively late, particularly in *Humanities AOLE* (WG, 2019) and *Unity and Diversity* (WAG, 2010), with these most recent syllabi accounting for the majority of KSMs identified, suggesting a sudden and growing prioritisation of this citizenship dimension rather than a long-term, gradual development.

This analysis was very revealing, illustrating changing emphases over time, but to understand what is happening regarding the country’s CEC framing of these concepts, how they are interpreted over time, and how this changes, we must qualitatively examine the syllabi, as well as quantitatively, to uncover nuance, context and meaning. The remainder of this chapter does this by presenting a mixed-method analysis, that addresses the consolidation of global citizenship versus the emergence of global identity (7.3.2), the resilience of national identity (7.3.3), the prevalence of cultural identity (7.3.4), a dominating focus on self and social identities (7.3.5), as well as finally, the adoption of a multiple or multileveled identity and belonging (7.3.6) conceptual frame, designed to incorporate the many that have emerged, over the study period.

7.3 Toward Multilevel Citizenship Identities

7.3.1 Introduction

This section presents a mixed quantitative and qualitative analysis of *identity and belonging* in the countries CEC. The overall finding is that conceptions are becoming more complex, and multileveled, increasingly incorporating notions of the self, social, cultural, and global, along with the more traditional, community and nation, found in the earlier syllabi analysed. Furthermore, the evidence suggests theories of cultural resilience better describe these transitions, than do cultural assimilation. This section essentially tells the story of the effect of globalisation on the countries' CEC, where earlier monocultural and nationalistic understandings gave way to multilevel conceptions that incorporate not just national and global identities, but also cultural, self, social forms.

7.3.2 Globalisation, Global Citizenship, and Global Identity

A key issue in citizenship is Globalisation. In one view it can homogenise local cultures and national identities (Berry, 2008:328, Sanchez, 2010:71, Awashreh and Ghanaimi, 2024:5906), assimilating them to some global norm. Some postnational political philosophies, including cosmopolitanism, describe a spread of global citizenship and universal global identity, even though this is sometimes considered detrimental to localised national identities. In such philosophies, citizens are inclined to identify with supranational political communities over their nation-states.

This section first explores a growing global perspective to citizenship found in the countries' CEC, showing how it aligns with Dill's (2013) global competencies approach over a global consciousnesses approach. It then examines evidence of recent but limited efforts to foster specifically a global sense of identity and belonging in future citizens (global consciousness) approach.

Across Ghana, Singapore, and Wales, Citizenship Education Curricula (hereafter CEC) increasingly presented a global perspective, although explicit references to global identity or global belonging did not appear until after 2020. Even then, such references remained rare

compared with national, cultural, self, and social identities. Nevertheless, evidence indicated emerging efforts to cultivate specifically global identities and belonging, albeit lagging behind the earlier consolidation of global citizenship perspectives more broadly. The earlier globalised curriculum content resonates with a “global competencies” over “global consciousness approach”, in that it seemed included to develop skills and outlooks so the student can essentially engage in a globalised economy. This is essentially a way to develop human capital. A global consciousness approach, aligned the human rights approach, sees the planet as one, and us as caretakers. In short, it is very well named. It seeks to develop a global consciousness in all citizens. (Dill, 2013)

This section will now highlight evidence of this earlier “global competencies” approach, which essentially involves here, imbuing a global perspective to the syllabus, and show how since 2020, a different, more directly “global consciousness” approach has emerged, by way of a handful of explicit references to cultivating a specifically global identity in future citizens.

To begin with, all three countries recorded growth in TMS of the term *global*, though Singapore and Wales experienced recent declines. Ghana’s core provision rose from one mention of global in 2007 to 22 in 2020 and 41 in 2024, while its extended provision increased from one in 2007 to 61 in 2019. Singapore’s core provision grew from four mentions in 2005 to 91 in 2020, before dropping sharply to 30 in 2023 and 12 in 2024, its extended provision followed a similar rise and decline. Wales’s core provision increased global references steadily throughout, while its extended provision peaked in 2008 before declining. These patterns suggest a growing global perspective overall, but recent reversals raise questions about the strength and direction of this trend.

In addition to charting an overall rise in syllabus mentions of the term *global*, this perspective was also found to increasingly feature in key syllabus mechanisms (KSMs). In Ghana, the term was absent in 2007 but appeared five times in both 2020 and 2024, with notable emphasis in the core competency “Cultural Identity and Global Citizenship” (2020:xxvi, 2024:xxvi). Similarly, in Singapore, the theme “Being Part of a Globalized World” was included in both the 2020 and 2023 *Social Studies* syllabi, but omitted in 2024, again pointing to 2023 as the year something changed in Singapore’s CEC. Also, in Wales, *global* mentions

appeared in KSMs from 2008, and the *Humanities AOLE* (WG, 2019) used the term frequently, though often in formulaic lists.

Overall, while increased use of the term *global*, both generally and with respect to the KSMs, supports the claim that global perspectives were becoming more important, most references addressed globalisation, global issues, or global citizenship more broadly, rather than global identity or belonging specifically. The reason this is addressed here, is that it illustrates the relatively long period of time, all three countries have been building a global perspective to their CEC, yet omitted, knowingly or not, a global perspective to the citizenship dimension, identity and belonging. Comparatively speaking, global identity landed in the countries CEC, after, global rights, global responsibilities, and global participation, as the previous chapters will attest.

Explicit attempts to shape citizens with a specific global identity or belonging appeared only after 2019. Ghana explicitly included the phrase “global identity” from 2019 onwards, where “The graduates from Ghana’s schools should be leaders with high sense of national and global identity.”(NCCA, 2019:ii), and in 2020 and 2024, though with limited conceptual elaboration, as a component of the core competency “cultural identity and global citizenship” that required students to “Exhibit a sense of nationality and global identity” (NaCCA, 2020:16and116, NaCCA, 2024:22,27,27,48and90). This handful of mentions reflected the most clearly articulated attempt to inculcate global identity found in the study.

Contrastingly, Singapore and Wales did not use the phrase “global identity” at all, though both have recently addressed specifically a sense of global belonging. In Singapore, this took the form of amendments to the definition of “a sense of belonging” between 2020 and 2023, where it was reframed to specifically include a global dimension, signalling a move toward global belonging. Included below in full, are the 2020 and 2023 syllabus versions of the definitions of “a sense of belonging” where 2023’s version has clearly been imbued with a global perspective, underlined by this researcher to illustrate the difference more clearly.

In 2020’s version, context is social and national:

A sense of belonging and a sense of hope. As students inquire into societal issues, they will be more cognisant that Singapore’s social fabric is continually evolving and

thus develop a deeper awareness of who they are as Singaporeans. This can help students appreciate the importance of engaging in societal issues and build the trust and belief that there is a place for each and every one of them here in Singapore. This will help build their confidence and optimism in the future of the nation and be resilient to face the challenges ahead. (CPDD, 2020:8)

By 2023 however, a clear global perspective was included:

A sense of belonging and a sense of hope. As students inquire into real-world issues and people's relationships with self, society and the environment, they will be more cognisant that Singapore's and the world's social fabric is continually evolving and thus develop a deeper awareness of who they are as locally confident and globally competent Singaporeans. This can help students appreciate the importance of engaging in real-world issues and build the trust and belief that there is a place for everyone in Singapore. This will help build their confidence and optimism in the future of our nation and be resilient in facing the challenges ahead. (CPDD, 2023:5)

Ghanaians were also instructed to identify with the global community in order to contribute to it:

They build skills to critically analyse cultural trends, identify and contribute to the global community. (NCCA, 2019:vi)

This very approach was also discernible in Wales's most recent CEC, which sought to shape citizens "who are able to identify with and contribute to their local, national, and global communities, now and in their future lives" (WG, 2019:8,8,70, 70). Whilst subtle, Ghana and Wales's recent CEC do present evidence of efforts to cultivate global belonging and by corollary, identity.

In summary, global perspectives have steadily expanded across all three countries' CEC, though recent drops occurred in Singapore and Wales. More notably, explicit attempts to promote a global identity emerge only after 2020. These efforts are most pronounced and explicit in Ghana, more indirect yet still significant in Singapore through newly globalised notions of belonging, and evident in Wales through requirements to "identify with" (WG,

2019:8and70) not just local and national but also explicitly, global communities”.

Collectively, this pattern suggests a reluctance to engage with postnational or cosmopolitan forms of identity formation. By contrast, and elaborated in the next section, national identity has held an enduring role in the countries’ CEC.

7.3.3 Enduring Importance of National Identity

This section presents an examination of national identity in the countries’ CEC, illustrating its enduring importance to their curricula conceptions of the good citizen. Where examples of the global contextualisation of identity and belonging, including the use of the explicit phrase “global identity” were found to be rare, and only since 2020, nationally oriented equivalents were found frequently across the study period, in most of the syllabi analysed, including in KSMs. By comparison then, all three countries CEC have been nationally, more than globally aligned in shaping citizens’ identity and belonging.

In Ghana’s core provision, *Social Studies* (CRDD, 2007) referenced identity just three times and belonging once, with national identity appearing in a syllabus aim to “develop a sense of national consciousness and national identity” (2007:iii), and national belonging in the problem statement:

Many Ghanaians tend to isolate themselves from issues of national concern. A fair knowledge of what the country is and means to the individual will rekindle the sense of belonging (CRDD, 2007:18).

Two further references described a loss of “true identity.” (CRDD, 2007:6and6), seemingly alluding to tribal identities, which the syllabus presents as “lost” through colonialism. Tribal identity is a component of cultural identity, which as will be shown in the next section, was found to be more prevalent than national or global identities in many of the syllabi analysed – particularly the later versions. Nevertheless, addressing a loss of true identity is enlightening, partly because it is emotive, but also because it appears to create a tension with the syllabus aim, for Ghanaians to develop a national identity. Tribal, or cultural identity, was addressed in the past tense and portrayed as historic, but also as something Ghanaians should grieve. Across all four references in the 2007 syllabus, national identity was either explicitly

encouraged or indirectly framed as what emerges after the loss of tribal identities. Combined with the omission of “global identity” or any global perspective, the syllabus made a small but unequivocal effort to foster national identity and belonging, while expressing regret for lost “true” identities.

The 2020 syllabus’s revision referenced identity and belonging far more frequently and embedded them within two sub-strands, “Self-Identity” and “Culture and National Identity.” The chapter will proceed to a discussion of these forms of identity, but the key point here, is that references to national identity increased significantly in 2020, appearing in the core competency “Exhibit a sense of nationality and global identity” (NaCCA, 2020:116), the sub-strand “Cultural and National Identity,” and the syllabus aim to “develop a sense of patriotism and national pride” (NaCCA, 2020:xiii). Although not always named explicitly, national identity became more deeply embedded.

In this Ghanaian *Social Studies* (NaCCA, 2020) syllabus, fostering a unified national identity that acknowledged cultural diversity was central to “strand three: a sense of purpose,” where learners were instructed to “Evaluate the place of culture in national identity” and “explain the concept national identity” (NaCCA, 2020:87). Further requirements included, “Sing patriotic songs and discuss how songs promote national identity” (NaCCA, 2020:87), “Interpret some national and traditional symbols and evaluate their importance in fostering national unity” (NaCCA, 2020:88), “Discuss ways of fostering national unity and defending the integrity of the nation” (NaCCA, 2020:88) and “Discuss how national ceremonies can be used to foster national unity” (NaCCA, 2020:88). This all reflected a strengthening of efforts to foster national identity.

The syllabus also introduced the core competency “Cultural Identity and Global Citizenship,” which despite its title, prioritises nation and service, as illustrated in the repeated statement in multiple syllabi from 2019, 2020, and 2024:

This competence aims to develop learners who put country and service foremost...
(NCCA, 2019:vi; NaCCA, 2020:xxvii; NaCCA, 2024:xxvi)

Lack of elaboration on what an active citizen actually is in the syllabus, further obscures meaning. Overall, national identity remained more central than global identity in Ghana, even

as newer forms of identity have entered the curriculum (cultural and self). Globalisation was even portrayed as something that could challenge national identity, where students were to understand “influences of globalisation on traditions, languages, and cultures” and “recognise resistance to global practices that are inimical to our culture” (2020:16). Ghana’s 2024 *Social Studies* syllabus (NaCCA, 2024) retained the core competency “Cultural Identity and Global Citizenship” but omitted the phrase “national identity” entirely, even as it mapped the competency across more content.

Summarising national identity and belonging in Ghana’s core provision, we can say that emphasis intensified between 2007 and 2020, but the phrase itself was omitted in 2024, even as multiple identities were encouraged, raising questions, as to why this longstanding feature of Ghanaian CEC has been omitted.

A similar focus on national identity existed in the extended provision, *Citizenship Education* (CRDD, 2007a), whose syllabus aim was to “develop a sense of national consciousness, unity, and development” and “acquire the desired characteristics of a Ghanaian patriot” (2007a:2). National identity was most visible in “National Symbols and Me” where learners were to identify national symbols, sing the anthem, recite the pledge, and demonstrate commitment by:

- Standing at attention during the anthem
- Placing the right hand on the chest during the pledge
- Flying the national flag
- Singing the anthem at major events (CRDD, 2007:12)

Although the phrase “national identity” was not explicitly used, these activities clearly sought to foster it, as can be seen in the statement “Our National symbols give us identity as Ghanaians” (2007:12). Identity was also framed through the lens of community (CRDD, 2007:11), and self (CRDD, 2007:9). *Citizenship Education*’s replacement, *Our World Our People* (NCCA, 2019), mentioned identity sixty-one times but national identity only once, in a forward, written by Dr. Matthew Opoku Prempeh (MP), and so arguably not part of the curriculum at all, the reference nevertheless reads,

The graduates from Ghana's schools should be leaders with high sense of national and global identity (NCCA, 2019:ii)

Aside from this solitary mention, the syllabus included a scattering of references to familial and community belonging, emphasising cultural identity over national or global identities. Unlike Ghana's core provision, which transitioned toward multiple identities from 2020, the country's extended provision consistently addressed self, national, and communal types since 2007. It could be contended that this does not reflect a multilevel view of citizens' identity, as in Yuval-Davies's (1997) theorisation, but rather a case of unclear and/or vague identities. However, the analysis identified consistent usage of KSMs for this dimension of citizenship. National, along with global, cultural, self, and social identity, all featured in particular KSMs, affording them central roles in the curriculum, and more importantly to this study, indicating their inclusion is intentional. See following examples:

Core Competency: Exhibit a sense of nationality and global identity. (NaCCA, 2020:16, 116)

Core Competency: Cultural Identity and Global Citizenship (CG) (NaCCA, 2020:xxvii,16, 116)

CG5.1: Show a strong sense of belongingness to one's culture (NaCCA, 2020:116)

CG5.4: Develop and exhibit a sense of cultural identity (NaCCA, 2020:116)

Sub-strand [theme]: Self-Identity (NaCCA, 2020:v,xxxiii,18)

Sub-strand 3: Culture and National Identity (NaCCA, 2020:vii,xxxiii,87)

In addition, the 2020 syllabus included the aim for learners to "exhibit a sense of belonging to the family and community" (NaCCA, 2020:xiii), and more generically to "Demonstrate sense of belongingness to a group" (NaCCA, 2020:13,13,21,76,79,82,84,85,86,90,94,97,105,106 and 101) clearly emphasising the requirement for social belonging. This approach was carried into 2024's syllabus, which also addressed the same forms of identity, in a variety of KSMs.

Singapore's CEC changed significantly between 2005 and 2024, where in the 2005 *Social Studies* syllabus (CPDD, 2005), identity and belonging were mentioned only once each, identity in relation to "fostering social cohesion and national identity through National Education" (CPDD, 2005:11), and belonging as developing "a sense of belonging to the community and nation" (CPDD, 2005:1). The syllabus also required students to "demonstrate a sense of pride, loyalty and commitment to Singapore" (CPDD, 2005:2). No references to global identity or other identity types appeared, meaning this syllabus was largely singular in its conception of identity as nationally framed.

As identity became a central focus in 2014, two social studies syllabus aims formalised the goal of shaping citizens' national identity:

As informed citizens, students will understand their individual identity vis-à-vis their identity as Singaporeans with a global outlook (CPDD, 2014:5)
and

And as concerned citizens, students would have a sense of belonging to their community and nation (CPDD, 2014:5)

While both aims clearly nationally oriented, the first is interesting as it equates one's self-identity with their national identity, implying there is/should be nothing more to self-identity than identification with the nation. As well as an increased focus on national identity and belonging, cultural identity featured more frequently. The 2020 syllabus retained both aims (see below), but removed the individual identity element, subsequently foregrounding national identity, albeit with the caveat that their identity should also have a "regional and global outlook",

As *informed* citizens, students will understand their identity as Singaporeans, with a regional and global outlook (CPDD, 2020:5)

As *concerned* citizens, students will have a sense of belonging to the nation, appreciate and be committed to building social cohesion in a diverse society" (CPDD, 2020:5)

Whilst these aims omitted the term “community” they incorporated “social cohesion” and the “diverse society”, which aligned with a growing cultural focus in the provision, but as is clear from the quotes above, national identity continued to be the central type in the curriculum’s increasingly complex conception of identity.

The 2020 *Social Studies* syllabus also explicitly identified “three levels of identity” (CPDD, 2020:15and31) and included nation among them, along with individual and community. This was perhaps the clearest indication that Singaporean identity is to have a national dimension. However, these classifications were later removed, signalling tension in Singapore’s CEC approach to identity. Further factors proffered to affect identity included, “personal qualities, family, culture, and nationality” (CPDD, 2020:31), again consolidating the role of the nation. The inclusion of ‘nation’ in the syllabus’s identity levels and aims reinforced national identity as a priority. The absence of ‘global identity’ further supported this. Furthermore, *Social Studies* (CPDD, 2020) also emphasised belonging, framed as belonging to Singapore, achieved through contributing to nation-building. The National Education disposition ‘Sense of belonging,’ repeated throughout the syllabus, stated students,

can play a part to make a difference in Singapore [which] in turn develops a sense of belonging” (CPDD, 2020:31–37).

The 2020 *Social Studies* (CPDD, 2020) syllabus aims remained in identical form in the 2023 and 2024 revisions. Beyond these aims however, there was little focus on national identity in the entirety of this provision, and less on global identity. These syllabi, up to and including 2024’s most recent version, focused on cultural identity, but again we see the factors that influence identity, listed as “personal qualities, family, and nationality” (CPDD, 2020:31). Beyond this the provision appears focussed on developing social belonging, in Singapore’s multicultural society.

In Singapore’s extended provision, the 2007 syllabus aimed to answer, “Who are we as a nation?” and “What constitutes our national identity?” (CPDD, 2007:5). Although topic content focused on global and macro-economic issues, national identity appeared prominently in key syllabus mechanisms. Importantly in the rationale, it was asserted that:

As citizens, our young need to cultivate values which develop a sense of belonging to Singapore... (CPDD, 2007:4)

In the syllabus scope, we are told “Being a Singaporean is an important part of our identity” (CPDD, 2007:48) and in a core concept, that “Singapore is our homeland, this is where we belong” (CPDD, 2007:48). One related question was posed “Why is caring for the nation important?” and answered,

Singapore is our homeland and our families, hopes, aspirations, and dreams belong here... Being a Singaporean is an important part of our identity... (CPDD, 2007:48)

This emotive language, “homeland” “hopes” and “dreams”, appear included to foster and build emotional bonds between the citizen and nation.

From 2014, the *Desired Outcomes of Education* (MOE, 1998, 2010a, 2022) were incorporated into Singapore’s *Social Studies* syllabi, the descriptions of which consistently included the aim of shaping “a concerned citizen who is rooted to Singapore...” (CPDD, 2014:3, 2020:5, 2023:3, 2024:7). The use of emotive language connoting strong organic bonds between citizens and nation, consistently through several curriculum reforms, exemplifies the continued importance placed on national identity in Singapore’s CEC.

Like Ghana, Singapore framed globalisation as a challenge to national identity, in 2007, only more overtly, as can be seen in the excerpt “Singapore needs to preserve its national identity in the face of globalisation” (CRDD, 2007:59). In *Civic and Moral Education* (CPDD, 2007) replacement, *Character and Citizenship Education* (SDCD, 2014), a focus on cultivating national identity continued, where it was claimed:

A person with National and Cultural Identity possesses a sense of responsibility to the nation... (SDCD, 2014:4)

More influentially the syllabus aim[s] for children to “Take pride in our national identity... and be committed to nation-building” (SDCD, 2014:5) strongly indicating a national perspective to identity is dominant in this provision. The message “Developing a Sense of National Identity and Nation Building” was then presented alongside the domain “nation”

prompting students to ask, “what makes us Singaporeans” (SDCD, 2014:5), which points to national identity remaining an important dimension in Singaporean conceptions of good citizenship.

In 2021 the syllabus was revised but *Character and Citizenship Education* (SDCD, 2021), continued a focus on national identity. Once again, it formed a syllabus aim, this time to shape active citizens, who “Develop a strong national identity based on a sense of belonging to the nation...” (SDCD, 2021:8). The adjective ‘strong’ implies a superficially or weaker national identity is unacceptable, and that only a powerful form of national identity will do. The reinstated “Three Big Ideas”, where “CCE Curriculum Content is premised on the three big ideas of Identity, Relationships and Choices” (SDCD, 2021:12), included identity, which encompassed nationality, religion, ethnicity, and profession (SDCD, 2021:11). Relationships were said to influence “national identity” (SDCD, 2021:11) and students were expected to “reflect on their national identity” (SDCD, 2021:14) and “strengthen their sense of national identity and commitment to contribute to society” (SDCD, 2021:26).

Across aims and themes, the phrase ‘national identity’ appeared eight times. National Education (MOE, 1997) again framed identity, instructing students to “experience and explore their national identity as Singaporeans... and foster a sense of hope and belonging to Singapore.” (SDCD, 2021:12). Although references to social belonging appeared more frequently, both types, national and social, were emphasised throughout.

In Wales, a recent focus on citizens’ identity was abrupt rather than gradual, and unlike Ghana or Singapore, Wales rarely addressed national identity directly. In the earliest syllabus (1991) analysed there was no specific national identity focus, rather emphasis was on community development, with only references to “shared identity” (CCW, 1991:4) and heritage. This lack of usage of the phrase “national identity” or indeed the equivalent “Welsh Identity” continued in *PSE* (WAG, 2008), which instead promoted notions on self-identity (half of all identity mentions) and cultural identity (half of all identity mentions), with no mentions at all, of national identity or belonging. Thus, in Wales’s core provision, the first two syllabi analysed, omitted national identity entirely. The most recent however, *Humanities AOLE* (WG, 2019) does include a national dimension to identity, and it is explicit.

The aim to shape “Informed, self-aware citizens...” (WG, 2019:8and70) describes learners “who are able to identify with and contribute to their local, national and global communities” (WG, 2019:8and70), implying the development of national identity – among others. The syllabus also requires schools imbue a “Welsh dimension and international perspective,” to learning, developing in learners “a sense of identity and of their own Cynefin [a Welsh word often translated as ‘habitat’ or ‘place of belonging (HWB, 20205)] and an understanding of Wales and its place in the wider world” (WG, 2019:12). Although direct links between “identity” and “nation” were limited, national contexts appeared frequently through the lexical group “local, national and global”, repeated eighteen times.

In the country’s Extended provision, *Developing the Curriculum Cymreig* (ACCAC, 2003) offered a stronger representation of national identity, stating,

A Curriculum Cymreig helps pupils to... identify their own sense of Welshness and to feel a heightened sense of belonging to their local community and country (ACCAC, 2003:2).

Myth and tradition were also deployed as mechanism to inculcate national identity,

Pupils found much to identify with... tales... drawing on tradition, myth, and legend (ACCAC, 2003:17).

Warnings against stereotyping were then issued, with the syllabus acknowledging, Wales “...has never been a homogenous society”, and that Welsh symbols may help young pupils, but that “If their use continues with older pupils, it gives a very false impression of Wales in the modern world” (ACCAC, 2003:6). A *Curriculum Cymreig* is positioned as “a unifying principle... fostering a sense of belonging for all pupils” (ACCAC, 2003:6), aiming for an “... increasing sense of belonging and understanding of their own Welshness” (ACCAC, 2003:13). In contrast, *ESDGC* (WAG, 2008a) focused on cultural rather than national identity. *Wales Europe and the World* (WAG, 2009) also emphasised cultural and self-identity, with one rationale statement linking multiple levels of belonging “...your home, your community, your nation and... the world as a whole. Our identity matters.” (WAG, 2009:14). Most recently, *Unity and Diversity* (WAG, 2010) prioritised cultural, self, familial, group, school, and community identities, with only two mentions of national identity,

including one in the glossary, “People with the same ethnic or national identity can have different perspectives and experiences” (WAG, 2010:35). A stronger statement appears in its rationale, referring to “belonging to their local community and country...” (WAG, 2010:4). Across the Welsh provisions, national identity appears far less frequently than in Ghana or Singapore.

To summarise, across the countries CEC, a focus on identity and belonging has evolved from weak or fragmented treatments toward more prominent, multilevel constructions. In Ghana, identity was marginal and nation-centred in 2007, framed as emerging after “loss of true”, presumably tribal identities, but became far more prominent and multilayered from 2020, with strengthened emphasis on national identity as patriotism, unity, and national consciousness, alongside cultural and self-identities, even as global identity remained vague or positioned as a threat. By 2024, explicit references to national identity were omitted despite continued encouragement of multiple identities pointing to a possible tension. Singapore consistently foregrounded national identity across curricular reforms, framing belonging through loyalty, contribution, social cohesion, and nation-building, while integrating cultural diversity and a global outlook, without weakening the primacy of the nation. Wales followed a different trajectory, largely avoiding explicit references to national identity in earlier curricula and prioritising self, cultural, and community social identities, with only recent reforms including a clearer national dimension embedded within broader local, national, and global frameworks.

Having established the enduring importance of national identity, the analysis now turns to cultural identity, which emerges as one of the most expansive and transformative dimensions of identity within the curricula.

7.3.4 Growing Emphasis on Cultural Identity

As pointed out already, globalisation is often thought of as a homogenising force, where localised cultural identities are incrementally replaced by a uniform, assimilative form of global identity (Davis-Hanson 2021). Globalisation has even been said to destroy cultures. Tomlinson (2003:15) for example described the general view of globalisation, as sweeping like:

...a flood tide through the world's manifold and discrete cultures, destroying stable localities, displacing peoples, bringing market-driven, 'branded' homogenisation of cultural experiences, thus obliterating the difference between locality-defined cultures which had constituted our identities. (2003:15 [quotation marks in original])

However, Tomlinson also offers an alternate explanation, common in the literature, that "...far from destroying it [localised culture], globalisation has been perhaps the most significant force in creating and proliferating cultural identity" (Tomlinson, 2003:16). Aligned with the national erosion versus national resilience dichotomy addressed earlier, the former view expects cultures, and by extension, cultural identity, to be eroded under accelerated globalisation, and the latter, sees them as resilient, where efforts are made to protect local and national cultures and identities. For the purpose of this study, cultural identity, as is addressed in the countries CEC, is broadly constituted by ethnicity, religion, and unsurprisingly, culture.

The remainder of this sub-section addresses the emergent and subsequently pervasive inclusion and foregrounding of cultural identity in all three countries CEC, highlighting how mainly monocultural understandings of identity, have given way to multicultural interpretations. Most directly, across Ghanaian CEC, explicit mentions of the phrase "cultural identity" were absent in 2007, but appeared in their core provision six times in 2020 and twenty-one times in 2024, with fifty-four occurrences in their 2019 Extended provision. In Singapore, the phrase was never used, although this is misleading as the qualitative analysis found culture to be a consistent element of the Singaporean CEC discussions of identity. Wales demonstrated greater fluctuation, not including the phrase in their Core provision in 1991, three times in 2008, but only once in 2019. In their Extended provision, "cultural identity" was included once in 2003, twice in 2008, not at all in 2009, before jumping to eleven in 2010. Notably, documents such as *ESDGC* (WAG, 2008) and *Wales, Europe and the World* (WAG, 2009) integrated cultural identity as a core thematic component despite limited explicit terminology.

In Ghana's 2007 *Social Studies* (CRDD, 2007), only four references to identity and belonging appeared, two on national identity and two describing Ghanaians' "loss of true identity" (2007:6) as a negative effect of colonization, linked to a "dependency mentality" and "distortion of cultures" (CRDD, 2007:6). Given Ghana's extensive ethnic diversity: Akan 47.5%, Mole-Dagbon 16.6%, Ewe 13.9%, GaDangme 7.4%, Gurma 5.7%, Guan 3.7%, Grusi

2.5%, Mande-Busanga 1.1%, Other 1.6% (Ghana High Commission Canada, 2026), these appear to be the identities described as ‘lost’. The syllabus implied citizens should grieve past identities, while simultaneously prioritising national identity. Although an entire unit, “Our Culture”, was included, its objectives framed culture negatively by requiring learners to examine “outmoded cultures and superstition” (CRDD, 2007:16), including “witchcraft” and “juju”, which allegedly cause “suspicion...unscientific thinking...[and] unnecessary fear” (CRDD, 2007:16). In this way the syllabus’s conception of identity can be considered monocultural, and national.

The 2020 *Social Studies* syllabus (NaCCA, 2020) marked a major shift, where cultural identity was no longer portrayed as lost but presented as a contemporary issue and citizenship competency, appearing in the syllabus rationale (2020:xi), KSM/Sub-strand and core competency “Cultural Identity and Global Citizenship” (2020:87), the description of which (2020:xxvii) as already explained was nationally focussed, despite its name. Nevertheless, the competency breakdown required learners to

Show a strong sense of belonging to one’s culture.

Develop and exhibit ability to defend one’s cultural beliefs, practices, and norms.

Develop and express respect, recognition, and appreciation of other’s cultures.

Develop and exhibit a sense of cultural identity (2020:116)

All of which supports the idea that fostering cultural identity in Ghana’s multicultural society, was a growing priority, though the only other sentence included in that breakdown pointed to a more assimilative form of civic nationalism, “Adjust to the demands of customs, traditions, values and attitudes of society” (2020:116) possibly illuminating a tension. However, the syllabus did formalise a focus on cultural identity in the KSM/sub-strand “culture and national identity,” where learners were to “Evaluate the place of culture in national identity” (2020:88), clearly affording it importance. The syllabus also referenced Ghana’s cultural diversity positively, requiring the study of “national and traditional symbols” such as “... Adinkra and other Ghanaian symbol[s] (CRDD, 2020:87). The syllabus urged respect for multiculturalism, prompting learners to,

Discuss how respecting the customs and culture of other groups plays a part in celebrating diversity in Ghana... (CRDD, 2020:88)

And providing the culturally diverse examples, “... Homowo celebrated by the Gas, Hogbetsoto by the Anlos, [and] Kundum by the Nzema” (NaCCA, 2020:88). These are examples of Ghanaian tribal festivals and ethnic groups cited in the syllabus. However, including symbols from some cultural groups but not others is itself potentially problematic, as it opens the door to charges of favouritism and exclusionism. That aside, acknowledging tribal cultural diversity this way represented a clear departure from 2007’s discourse of lost identities.

In 2024 (NaCCA, 2024), cultural identity and global citizenship again appeared in the rationale (2024:xi/xii) and remained a core competency (2024:xxv). The sub-strand “culture and national identity” however was omitted. The closest equivalent, “sociocultural practices in Ghana”, was housed in the broader strand “Identity, Significance and Purpose” (NaCCA, 2024:xxx), suggesting growing curricular emphasis on identity but a decoupling of cultural and national identity. The syllabus still required learners to “show a strong sense of belongingness to one’s culture” (NaCCA, 2024:14, 40, 48, 90), and the core competency ‘cultural identity and global citizenship’ was mapped fourteen times, with the subskill ‘Develop and exhibit a sense of cultural identity’, itself mapped six times (NaCCA, 2024:2, 6, 39, 41, and 90). This most recent syllabus represented a continuation of some of the focus on cultural identity via the competency, but it lost its position as a KSM/sub-strand title.

A similar emergence and growth of focus on cultural identity was found in Ghana’s Extended provision. 2007’s *Citizenship Education* (CRDD, 2007a) offered minimal focus on cultural identity, defining ethnicity simply as group belonging (CRDD, 2007a:30), with most references relating to self, social, and national identity in the context of peer groups. Culture appeared in “One People, One Nation” (CRDD, 2007a:23), where cultural diversity was described as a national strength but without a real focus on cultural identity.

A major shift occurred in 2019’s *Our World Our People* (NCCA, 2019), which referenced ‘cultural identity’ fifty-four times due to the extensively mapped core competency “Cultural Identity and Global Citizenship” (NCCA, 2019:vi) which as explained was later incorporated into Ghana’s Core provision, the coherent approach suggest this was an important focus. The competency was mapped forty-two times as “cultural identity and global citizenship” (NCCA, 2019:2-62) but “cultural identity” was also mapped nine times (NCCA, 2019:11-53), indicating its rising importance in Ghanaian conceptions of citizenship.

Overall, the treatment of cultural identity shifted dramatically in Ghana, from being described as ‘lost’ in 2007, to frequent but vague inclusion in 2019, to more detailed, positive, and competency-based approaches in 2020 and 2024. Subskills in the later syllabi portray cultural identity as something to value, defend, and feel belonging toward, contrasting sharply with 2007’s deficit framing. Definitions of culture also evolved from a monocultural, national understandings in 2007 to explicit recognition of Ghana as a multicultural society in 2020 and 2024. Yet the expectation that citizens adjust to the demands of customs, traditions, values, and attitudes of society (NaCCA, 2020:116; 2024:90) suggests a civic national emphasis, revealing potential tension between multicultural recognition and national cohesion.

In Singapore, the phrase “cultural identity” never appeared explicitly, but this is misleading as the concept was referenced extensively, featuring in key syllabus mechanisms (KSMs), including influentially aims and themes. In *Social Studies* (CPDD, 2005) culture and identity appeared infrequently and were never connected. Multiculturalism was addressed under “Living in Peace and Harmony”, which addressed “Living in multi-racial Singapore” (CPDD, 2005:5) and required students to “appreciate our cultural diversity” (CPDD, 2005:13).

The 2014 syllabus explicitly introduced cultural identity, prompting learners to “describe how identity could be shaped by one’s culture” (CPDD, 2014:24), where “our culture and experiences help shape our identity” (CPDD, 2014:24,25,42), and reiterated these within the unit “Living in a Multicultural Society” which was retained in subsequent syllabi. Its syllabus aims however, only emphasised “a sense of belonging to their community and nation” (CPDD, 2014:5) only.

By 2020, cultural identity references in *Social Studies* expanded further. The syllabus aim shifted to “have a sense of belonging to the nation... committed to building social cohesion in a diverse society” (CPDD, 2020:5), signalling increased emphasis on diversity. The Key Understandings reinforced culture’s role in shaping identity (CPDD, 2020:31), and core values (Respect, Harmony) connected identity, multicultural experience, and social cohesion. Students were to be taught how examining identities in a multicultural society fosters cultural understanding (CPDD, 2020:31) and supports the “National Education disposition of belonging” (CPDD, 2020:31). This all reflected a growing emphasis on fostering cultural identity, however, an explicit definition identified three levels of identity “individual,

community, and national” (CPDD, 2020:31), omitting cultural identity and so creating ambiguity, reflecting a tension.

Singapore’s 2023 Social Studies syllabus retained the diversity focused citizenship aim (CPDD, 2023) but significantly reduced cultural identity content and removed *Living in a Multicultural Society*, suggesting a potential shift away from the earlier trend. However, the 2024 syllabus reinstated “Living in a Multicultural Society” (CPDD, 2024:11) and restored cultural identity emphasis, including the guiding question “How is my identity shaped by my culture?” (CPDD, 2024:16). The citizenship aim again stressed cohesion in a diverse society (CPDD, 2024:6). With themes on migration and conflict resolution, 75% of Singapore’s 2024 syllabus content related to culture, and furthermore the KSMs linked culture and identity (CPDD, 2024:15-16). However, definitions of identity (personal qualities, family, culture, nationality) and culture (race/ethnicity, religion, customs) were brief and left conceptual ambiguity. A concrete example was provided in the reference to Malay “traditional kampung spirit” (CPDD, 2024:28), which if Chinese (approx. 75% of population) would risk privileging the dominant ethnicity, but as it’s Malay (approx. 14%), a minority group, more likely reflects a cultural resilience response to globalisation.

Singapore’s extended provision presented a weaker focus on cultural identity. *Civic and Moral Education* (CRDD, 2007) referenced identity as national or school-based, belonging was fostered largely to the nation, with no cultural or global identity addressed, indicating a nationalist orientation. Topics aligned loosely with identity and belonging but not cultural identity. *Character and Citizenship Education* (SDCD, 2014) included cultural identity through Singapore’s *21st Century Competencies* (MOE, 2010), defining a person with “national and cultural identity” as one committed to national ideals and culture (SDCD, 2014:4). This monocultural framing conflicted with references to sociocultural sensitivity, and mapping activities expanded through self, family, school, community, nation, world, but omitted cultural identity, reflecting inconsistency between Singapore’s main and Extended provisions. 2021’s *Character and Citizenship Education* (SDCD, 2021) continued to prioritise national identity over cultural identity. Its only direct link between identity and culture appeared in the “*three big ideas*” - essentially syllabus organising themes – noting, identity may derive from ethnicity, religion, profession, and nationality (SDCD, 2021:11). National identity was strengthened through understanding diverse backgrounds (SDCD, 2021:29), but references to *culture* fell between 2014 and 2021.

In Wales, cultural identity has been consistently addressed across the curriculum provision. The earliest syllabus, *Community Understanding* (CCW, 1991), sought to help pupils “identify and appreciate the common experience of their cultural heritage as well as understand its diverse and distinctive aspects” (CCW, 1991:2). Three (of six) syllabus aims indirectly addressed cultural identity through a focus on heritage and community:

1. appreciate the common experience of their cultural heritage.
2. know what is distinctive about their own communities.
3. understand how heritage is mediated and modified by time and place. (CCW, 1991:3)

It emphasised relating subjects to pupils’ experiences, cultural heritage, and active citizenship, warning against stereotyping in relation to gender and race (CCW, 1991:6) and promoting understanding of cultural diversity within and beyond Wales (CCW, 1991:9). In *PSE* (WAG, 2008), cultural identity remained central. Learners were to develop “a sense of personal and cultural identity that is receptive and respectful towards others” (WAG, 2008:6), with support for ethnic and cultural identities and preparation for life as global citizens (WAG, 2008:6). The syllabus promoted awareness of diverse cultures (WAG, 2008:16) and required understanding of Welsh cultural heritage and diversity (WAG, 2008:18), including how cultural and religious values shape life (WAG, 2008:19a). Of six references to identity, half concerned cultural identity. By 2019, cultural identity appeared through the *Welsh dimension*, requiring exploration of “Welsh businesses, cultures, history, geography, politics, religions, societies, and world views” (WG, 2019:12) to develop “a sense of identity and of their own *Cynefin*” (WG, 2019:12), where *Cynefin* was defined as a historic, cultural and social sense of belonging (WG, 2019:62). What Matters statements further highlighted how “identity, heritage and *Cynefin*” influence learners (WG, 2019:07, 58) and how the natural world contributes to belonging (WG, 2019:07, 46).

The *Humanities AOLE* sought understanding of “what it means to be Welsh” through study of Wales’s cultures, languages, and beliefs (WG, 2019:12), with further attention to “Identity and language” (WG, 2019:39) and social viewpoints shaped by identity, multiculturalism, gender and sexuality (WG, 2019:45). An Achievement Outcome required understanding cultural diversity and “the importance of language, beliefs and values in the formation of cultural identities” (WG, 2019:60). Most influentially and directly the syllabus aim for “Humanities to support learners” to “study the history, geography, cultures, values,

languages, and beliefs of Wales, which helps them to make sense of their identity” (WG, 2019:12) formalised a focus on cultural identity.

Wales’s Extended provision, *Developing the Curriculum Cymreig* (ACCAC, 2003), addressed cultural identity and belonging directly. The “Myself and Others” unit included discussion of cultural identity (ACCAC, 2003:11), and how pupils were supported to “understand what is distinctive about life in Wales, to celebrate diversity and to acquire a real sense of belonging” (ACCAC, 2003:4). Welshness was developed through local experiences (ACCAC, 2003:12) and a broader sense of belonging (ACCAC, 2003:2). The syllabus warned against stereotypical Welsh imagery suggesting the following are suitable contexts-for-learning only for younger children, “images of dolls in Welsh costume, red dragon flags, daffodils, castles and sheep” (ACCAC, 2003:6). In *ESDGC* (WAG, 2008a), “Identity and Culture” formed an organising theme, appearing nine times, mapping a quarter of the syllabus, from the rise of fascism (WAG, 2008:38) to how cultural differences shape society (WAG, 2008:42). Opportunities included developing personal values, respecting diversity, questioning stereotypes, understanding beliefs, challenging prejudice, and recognising the enrichment brought by cultural diversity (WAG, 2008:34). Illustrations included analysing media portrayals, antiracism campaigns, faith perspectives, religion in Wales, and asylum seekers’ experiences (WAG, 2008:36). Cultural influences, language, beliefs, and values were emphasised (WAG, 2008:38). This promoted multicultural citizenship despite Wales’s relative demographic homogeneity.

Wales, Europe, and the World (WAG, 2009) continued this focus, seeking to enhance identity and heritage (WAG, 2009:10) and studying equal opportunities, diversity, languages, beliefs, and values (WAG, 2009:39). Most visibly the syllabus was divided into four components (Political, Social, Cultural, Economic), with the syllabus aim of providing learners with “opportunities to experience and undertake activities that enhance their sense of identity and heritage” (WAG, 2010:10).

In *Unity and Diversity* (WAG, 2010), cultural identity was pervasive across themes of multiculturalism, equality, and belonging. The syllabus drew on *Rights to Action* (2004), requiring learners’ race and cultural identity be recognised and supported (WAG, 2010:2). The syllabus aim tasked learners to develop a sense of personal and cultural identity, receptive to others and be prepared for multi-ethnic Wales (WAG, 2010:2). Identity and

culture included valuing diversity, exploring how cultural differences shape worldviews, and understanding societal ethical issues (WAG, 2010:56). Case studies emphasised belonging, diversity, and respect (WAG, 2010:6, 11, 21). Identity also appeared across curriculum mapping, including religious/cultural identity (WAG, 2010:51, 57), personal/cultural identity (WAG, 2010:41, 43), and cultural identities unique to Wales (WAG, 2010:43). Definitions included ethnicity as socially constructed and culturally based (WAG, 2010:34), plurilingualism (WAG, 2010:37), pluralism (WAG, 2010:37), multiculturalism (WAG, 2010:36), and identity as socially constructed and multiple (WAG, 2010:35). The rationale emphasised belonging to Wales while valuing other cultures (WAG, 2010:4). The syllabus aims included an unambiguous entry that sought the development of self and cultural forms of identity.

Every learner should develop a sense of personal and cultural identity that is receptive and respectful towards others. (WAG, 2010:2)

All of which suggests cultural identity is an increasingly key component of one's identity in the Welsh CEC.

Overall, the analysis demonstrates a clear shift across Ghana, Singapore, and Wales away from predominantly national conceptions of identity towards increased engagement with cultural identity in citizenship education, though with significant differences in emphasis and consistency. In Ghana, cultural identity moved from a deficit framing in 2007, where Indigenous cultures were portrayed as lost or problematic, to a more positive and competency-based focus from 2019 onwards that increasingly recognises multicultural diversity, albeit alongside expectations of civic national conformity. Singapore followed a trajectory, with culture progressively shaping discussions of identity, diversity, and social cohesion despite limited explicit use of the term “cultural identity” and ongoing prioritisation of national unity. Wales demonstrated sustained and explicit engagement, with strong emphasis on heritage, belonging, diversity, and the socially constructed nature of identity. Taken together, these cases suggest that globalisation has not simply homogenised citizenship education but has instead prompted varied national responses in which cultural identity has become increasingly salient.

7.3.5 Self and Social Identity and Belonging: Changing Balances

It has been claimed that “Our era is witnessing an increasing impact of globalisation on self and identity” (Hermans and Dimaggio, 2007:31). Self-identity is unique to the individual and reflects the intersection of different local-global influences. A focus on self-identity, acknowledges globalisation and the composite identities with which modern citizens can align, by recognising individuals construct their own identities. Similarly, efforts to foster social (including familial) belonging, possibly represent localised responses to globalisation. This section explores how both concepts were treated in the countries’ CEC.

In Ghana’s core provision, explicit reference to *self-identity* was absent in 2007, emerged five times in 2020 where it constituted an entire sub-strand, and declined again in 2024, appearing only twice with the sub-strand removed. In Ghana’s extended provision, the term similarly received minimal attention in 2007 not appearing at all, and only once in 2019, indicating a consistently limited emphasis on the concept.

Ghana’s *Social Studies* (NaCCA, 2020) demonstrated the strongest engagement with self-identity, devoting a full sub-strand to cultivating learners’ understanding of themselves as unique individuals. This included identifying attitudes that promote self-worth, such as self-confidence, a can-do spirit, and positive life orientation (NaCCA, 2020:18), and examining the importance of knowing oneself, including recognising one’s strengths and weaknesses (NaCCA, 2020:19). By 2024, this sub-strand was reconfigured as “The Individual and the Community”, omitting the explicit label identity but maintaining its substantive focus. Learners were required to examine the concepts of “self” and “self-identity” (NaCCA, 2024:8), discuss the reasons for knowing oneself (NaCCA, 2024:9), and identify attitudes that enhance self-worth.

In Ghana’s 2007 extended provision, content relating to the individual comprised approximately one quarter of the syllabus. The unit “Knowing Myself” required pupils to identify their individuality (CRDD, 2007:9) and addressed self-identity through narrowly defined exemplars such as physical appearance, personal preferences, talents, and again strengths and weaknesses (CRDD, 2007:9). Learners were further instructed to know themselves (CRDD, 2007:9,20) and develop self-confidence (CRDD, 2007:9,20,32).

Although the 2019 curriculum referenced self-identity only once (NCCA, 2019:17), its overarching aim for learners to “Appreciate themselves as unique individuals” (NCCA, 2019:v) nonetheless indirectly invoked identity formation. A notable example appeared within the sub-strand Nature of God, where learners were expected to explain “how special each individual is” (NCCA, 2019:2). The exemplar accompanying this task articulated self-identity explicitly: “My name is Esi, I am black and beautiful... I am proud to be a Ghanaian” (NCCA, 2019:2). Other self-related constructs, including self-awareness (NCCA, 2019:vi,3), self-knowledge (NCCA, 2019:vi), self-esteem (NCCA, 2019:vi), self-confidence (NCCA, 2019:vi,14,45), self-regulation (NCCA, 2019:vi), self-control (NCCA, 2019:56), and self-consciousness (NCCA, 2019:57), further underscored the curriculum’s orientation toward the individual, even where identity was not explicitly named. By contrast, themes of social belonging and communal identity appeared far less frequently. The 2007 Core provision did not address them, other than in the form of lost tribal identity, as addressed, and although the 2020 curriculum introduced the explicit objective for learners to “exhibit a sense of belonging to the family and community” (NaCCA, 2020:xiii) as well as the core competency “Demonstrate sense of belongingness to a group” (NaCCA, 2020:13, 21, 76–116), these elements remained marginal relative to the extensive treatment of self-identity. The two it must be clarified are not mutually exclusive. *Social Studies* (NaCCA, 2024) retained the syllabus aim “exhibit a sense of belonging to family and community” (2024:xiii) and despite addressing community issues more broadly, seldom linked these to identity formation, suggesting unresolved tensions regarding the appropriate role for fostering community belonging, when shaping citizens.

Ghana’s extended provision displayed comparatively stronger, though still limited, engagement with belonging. Most influentially the syllabus aim to “exhibit a sense of belonging to the family and community” (NCCA, 2019:v) was introduced. Other examples included discussion of the benefits and dangers of peer groups (NCCA, 2019:28), and activities such as composing songs about the right to belong to a family (NCCA, 2019:34). Within “Our Nation Ghana, being a Citizen” the curriculum linked the development of positive self-identity to civic commitment (NCCA, 2019:17), acknowledging, at least implicitly, the social dimensions of identity formation. Sub-strands organised under this broader identity related theme, such as “The People of Ghana” and “Socio-Cultural Practices in Ghana” and “The Individual and Community Development” addressed socially constituted identities more directly and aligned with communitarian perspectives.

Much like Ghana, Singapore's 2005 *Social Studies* syllabus did not include *self-identity*, but did reference several self-oriented values such as self-motivation (CPDD, 2005:11), self-reliance (CPDD, 2005:14), and self-confidence (CPDD, 2005:16), alongside an ability-oriented aim "to maximise their individual talents..." (CRDD, 2005:1), again similar to Ghana. The term *self-identity* was absent. Again, however a shift occurred in 2014, when *Social Studies* (CPDD, 2014) introduced the syllabus aim. "...understand their individual identity visa vis their identity as Singaporeans with a global outlook" (CPDD, 2014:5). This reflected a formalisation of focus on self, or individual identity, but also implied it equated largely to national identity. That the terms "*individual*" and "*vis-à-vis*" disappeared from later syllabus aims (CPDD, 2020:5; 2023:3; 2024:6) adds uncertainty to any claim self-identity was a growing focus.

Contrastingly however, between 2014-2024, Singapore's Desired Outcomes of Education included the aim to shape confident people. The aim instructed students to "know himself[sic]" in 2014, "know himself/herself" in 2020, and "know themselves" in 2023 and 2024. In the same repeatedly deployed aim, they were to "think independently and critically" (2014:3, 2020:6, 2023:3, and 2024:7). However, these do not explicitly address self-identity. Nevertheless from 2014, other forms of self-awareness were emphasised, including "self-reflective inquiry" (CPDD, 2014:10), "self-awareness" (CPDD, 2014:15,36), "self-esteem" (CPDD, 2014:18), "financial self-reliance" (2014:32-41), and "self-management" (CPDD, 2014:36-41). The term *individual* appeared eighteen times, but mainly in communitarian contexts, either through coupling with the term community, or via references to the individual and the group (2014:24).

The 21st Century Competencies (Figure 6.6 above) was an educational framework launched in 2020 in Singapore to ensure pupils graduate with an appropriate set of flexible skills, competencies and awarenesses to survive and thrive in a highly unpredictable contemporary global society. It further strengthened self-focused content, however they rarely addressed identity, and if they did, they did so contextualising self, socially (CPDD, 2014:6). In other words, a healthy happy society, is full of healthy happy individuals. Self is contextualised with communitarian as opposed to individualist paradigms.

By 2020, self-identity gained clearer emphasis, and personal qualities were included as factors shaping identity (CPDD, 2020:31), and the syllabus referenced the *self*, forty-two

times (versus twenty-six in 2014 and nine in 2005). It also retained the self-reflective desired outcome (CPDD, 2020:6). However, the term *individual identity* was removed from syllabus aims, despite increased self-awareness references. Most fundamentally, identity was again defined as comprising the individual, community, and nation (CPDD, 2020:31), an unambiguous finding, qualifying that self-identity had indeed become a recognised form of identity. The 2023 syllabus retained aims and desired outcomes focusing on self-knowledge but not self-identity. A definition of belonging referenced one's relationship with oneself. In 2024, these aims persisted, with reduced references to *self*, though personal qualities again appeared as identity shaping factors (CPDD, 2024:16). Alongside an emergence of the self, all Singaporean syllabi analysed consistently stressed community or social belonging. In 2005, students were to “develop a sense of belonging to the community and nation” (CPDD, 2005:1). This became a formal aim in 2014 (CPDD, 2014:5), and in 2020/2024 shifted slightly but maintained a communitarian emphasis (CPDD, 2020:5; 2024:5). In 2024, an emphasis on self was clarified through the requirement to “Understand... People's Relationships with Self, Society, and the Environment” (CPDD, 2024:5), which the syllabus describes as overarching themes.

In Singapore's Extended provision, the 2007 syllabus contained no direct self-identity references, though the term *self*, appeared eighty-two times, primarily as pragmatic preparation for the future (NCCA, 2019:4). In 2014, the “3 Big Ideas” of “identity, relationships, choices” returned, with sixty mentions of *self*, but again without direct cultivation of self-identity. A definition of identity however, in *Character and Citizenship's* (SDCD, 2014) “3 Big Ideas”, did appear to infuse a focus on self-identity, albeit indirectly, via its focus on “individual uniqueness (Marcia, 1966). [and] the development of self-understanding... (SDCD, 2014:9)

By 2021's revision of *Character and Citizenship Education*, self-identity appeared overtly. Identity was defined via the question “Who am I?” (SDCD, 2021:11), as a subjective experience shaped by social interaction. It included belonging to social groups such as ethnicity, religion, profession, nationality (SDCD, 2021:11). Self-identity became central, with guiding questions such as “Who am I?” ‘Who do I want to be?’ and ‘What does my best self-look like’ intended to shape their students' identity positively (SDCD, 2021:11). The syllabus aimed for students to “understand themselves and appreciate what is a healthy self-identity” (SDCD, 2021:27), explicitly linking self-identity development to social cohesion

and collective identity. Relationships, another of the “3 Big Ideas”, were framed as shaping personal, social, civic, and national identity (SDCD, 2021:11) again suggesting identity is formed through social interaction, a uniquely communitarian principle. Thus, while Singapore increasingly incorporated self-identity, especially post-2021, both main and Extended provisions retained a strong, consistent emphasis on social belonging and communal identity.

Correlatively, in Wales’s core provision, self-identity was absent in 1991’s *Community Understanding* (CCW, 1991), where, as the name suggested, attention centred on shared and communal identities. *Community Understanding* (CCW, 1991) foregrounded nongeographic communities defined by common interests or shared identity, such as the London Welsh community, the Jewish community, or the scientific community (CCW, 1991:4). It required learners to appreciate their cultural heritage, recognise distinct features of their own communities, and understand how heritage is mediated by time and place (CCW, 1991:3). Additional guidance emphasised the importance of “shared values and beliefs” in forming cultural heritage and identity (CCW, 1991:9), and encouraged pupils to explore their communities through geographical, historical, social, economic, political, cultural, and scientific perspectives to enhance their sense of belonging (CCW, 1991:5).

A significant transition occurred in 2008 with the introduction of *Personal and Social Education* (WAG, 2008), which incorporated an individualised dimension of identity alongside the earlier communal emphasis. The *PSE* (WAG, 2008) syllabus marked the emergence of an explicit and equal (at least from the title) focus on self-identity and social belonging. *PSE*, concerned with personal and social development, also paid attention to socially contextualised understandings of the self. This is evident in statements that learning providers should cultivate in every learner “a sense of personal and cultural identity that is receptive and respectful towards others” (WAG, 2008:6), that children express feelings and develop empathy as their self-identity evolves (WAG, 2008:16), and that learners should assume responsibility for their personal and social development through increased awareness of self-identity (WAG, 2008:17).

In Wales’s most recent Core provision, the *Humanities AOLE* (WG, 2019), self-identity remains a consistent but often socially embedded theme. Examples include, how individual values and norms contribute to collective identity (WG, 2019:39), and the assertion that self-

understanding enables learners to develop their identity and influence the communities in which they live (WG, 2019:58). This syllabus also introduces the concept of “Cynefin” defined as “the place where we belong” is not merely a physical location but a historic, cultural, and social environment that shapes the community (WG, 2019:82). The concept underscores the curriculum’s ongoing emphasis on belonging and cultural rootedness.

In Wales’s extended provision, early reference to self-identity appears in *Developing the Curriculum Cymreig* (ACCAC, 2003), requiring:

Pupils discuss their own and others’ beliefs and understand how these shape individual and group identity (2003:54).

Later syllabi, such as *ESDGC* (WAG, 2008a), did not foreground self-identity, though it re-emerged in *Wales, Europe and the World* (WAG, 2009) through a focus on moral and spiritual development, particularly in relation to how beliefs and values influence personal identity and lifestyle (WAG, 2009:38-39). A more pronounced emphasis was articulated in *Unity and Diversity* (WAG, 2010), which addressed personal identity extensively, required learners express their “personal/cultural identity” (WAG, 2010:43). The document further stated that every learner should develop a sense of personal and cultural identity that is receptive to others (WAG, 2010:2), that the *Curriculum Cymreig* should cultivate pride in self, school, and community (WAG, 2010:6), and that personal identity is grounded in the fundamental human need to belong, initially to the family and subsequently to broader groups such as school, community, ethnic, cultural, or linguistic groups (WAG, 2010:21). Identity was defined as both self-image and the perception of others (WAG, 2010:41), while learners were also encouraged to explore how music can address personal identity and social issues (WAG, 2010:49). The syllabus further required learners to develop awareness of self-identity and self-worth (WAG, 2010:58), and to understand how beliefs and values influence personal identity and lifestyle (WAG, 2010:58).

Taken together, Wales’s evolving curriculum reveals a pattern of shifting emphases, with different periods prioritising communal or individualised interpretations of identity. Nonetheless, across interventions such as *Community Understanding* (CCW, 1991) and *Personal and Social Education* (WAG, 2008), the curriculum has consistently incorporated

both collective and personal dimensions of identity, albeit with varying degrees of prominence over time.

Across all three national contexts, early syllabi tended to prioritise communal and national identities, with limited or no explicit attention to self-identity. Over time, particularly from the late 2000s onward, self-oriented concepts such as self-knowledge, self-confidence, and self-awareness increasingly appeared. Ghana's curricula showed fluctuating attention to self-identity, peaking in 2020 with a dedicated sub-strand before being reconfigured in 2024, while Singapore demonstrated a gradual formalisation of self-identity, especially after 2020 and most clearly in 2021's *Character and Citizenship Education* (SDCD, 2021), though consistently framed within communitarian values. Wales shows the most sustained balance, moving from a strong communal focus in the 1990s to an explicit integration of personal and social identity through *Personal and Social Education* (WAG, 2008) and later the *Humanities AOLE* (WG, 2019).

So far, the chapter has illustrated a late but emergent focus on global identity, a resilient curriculum space for national identity, growing focus on cultural identity and shifting balances of social and self-identity. This proliferation has been theorised to actually be part of the same dynamic of simply having multiple citizenship identities. This idea that has emerged, is known variously as multiple, multiscale, and multilevel citizenship among others, and essentially refers to the idea that our citizenship identities are formed through interaction with, and response to many influences, both from within, and beyond nation-state borders. Situated in the context of postnational citizenship, this idea accommodates all of the forms addressed so far in the chapter, and this is perhaps why it has been adopted so readily across the board, as will now be shown in the chapter's penultimate section before the conclusions.

7.3.6 Multiple Citizenship Identities

A longstanding debate in the literature concerns whether identity is a fixed construct (traditionally conceived as within national boundaries), or an evolving amalgam of different influences, with increasing scholarly consensus favouring the latter (Yuval-Davies, 1999), where research has also shown that the interaction of local and global forces can result in hybrid and multilayered identities.

The remainder of this section presents a short analysis of explicit references to such concepts, as well as a logical deduction of the meaning behind the proliferation of different types of identity being addressed in the countries' CEC, where static and nationally-bound model give way to more fluid, socially-constructed, and multiply constituted conceptions, reflecting a significant transition in the countries understanding of the good citizens, albeit to differing degrees in all three nations. Early syllabi predominantly framed identity as singular, typically expressed through national or communal belonging. Subsequent iterations however, increasingly conceptualised identity as multiple, and multilayered, reflecting recent research on globalisation's influence in fostering citizenship identity as multilayered (Yuval-Davies, 1999) inclusive of evolving notions of self and autonomy.

Ghanaian CEC transitioned from a focus on just national identity and community belonging (CRDD, 2007) to an explicit engagement with multifaceted identity formations encompassing self, cultural, national, and global identity. Despite *Social Studies* (CRDD, 2007) asserting “Culture is never static” (CRDD, 2007:15), its treatment of identity initially remained relatively fixed. Later syllabus content, however, acknowledged multiple identities through discussions of cultural resilience, hybridity, and parallel cultures (CRDD, 2007:16), where the latter are defined as

When two culturally different ways of doing the same things is adopted while only one way could suffice, the two ways are referred to as “parallel cultures” (CRDD, 2007:16)

The 2020 syllabus revision articulated identity as a multidimensional construct by embedding self-, cultural- and national identity across its sub-strands, and the 2024 syllabus continued to promote multiple identities, albeit with a reduced emphasis on self-identity. Earlier Singaporean syllabi also only emphasised national identity and communal belonging, yet, like Ghana, progressively incorporated a broader spectrum of identities, including self, familial, school, community, national and global. *Social Studies* (NaCCA, 2020) made this explicit by delineating three levels of identity as individual, community, and nation (NaCCA, 2020:15). Although subsequent syllabi removed this direct articulation, they retained a multidimensional framework.

In *Citizenship and Character Education* (SDCD, 2014), the second of Singapore's Extended provision included in the analysis, identity was presented as evolving across childhood and adolescence, shaped by competence, self-understanding, and values (SDCD, 2014:9). Identity was also mapped across interactions with self, family, school, community, nation and world, further eluding to multiple identity. 2021's syllabus revision further reinforced this view of identity by explicitly describing it as a "complex and multi-faceted construct," (SDCD, 2021:11) influenced by personal experience and the social environment, including ethnicity, religion, and nationality (SDCD, 2021:11). Increasing emphasis was placed on self, cultural, and global identity within the broader conception of identity.

Early in Wales's core provision, *Community Understanding* (CCW, 1991) recognised that citizens simultaneously belong to multiple communities (family, locality, Wales, the UK, the Commonwealth, Europe, and the global community) (CCW, 1991:4), though it did not explicitly address the multiplicity or fluidity of identity. *PSE* (WAG, 2008) encouraged the development of personal and cultural identity and alluded to identity's evolving nature ("As their self-identity develops...") (WAG, 2008:16), though without fully theorising multiplicity. *Humanities AOLE* (WG, 2019) highlighted learners' participation in multiple communities and required engagement at local, national, and global levels (WG, 2019:8 and 70), as well as engagement with multiple perspectives (WG, 2019:45), yet remained largely detached from explicit identity theory.

In contrast, Wales's extended provision offered a more comprehensive treatment. *Wales, Europe, and the World* (WAG, 2009) implied multilayered belonging (WAG, 2009:14). *Unity and Diversity* (WAG, 2010) advanced a sophisticated account of identity as "socially constructed and multiple," shifting across contexts and time (WAG, 2010:35), affirmed the fluidity of culture (WAG, 2010:18) and noted that individuals may hold "multiple identities" (WAG, 2010:3) and belong to groups that change over time (WAG, 2010:21).

To summarise, across Ghana, Singapore and Wales, CEC provisions have increasingly incorporated broader and more differentiated forms of identity. Beyond the earlier preoccupation with national and communal identity, later syllabi engaged extensively with cultural, self, and global identity, and in some instances introduced additional dimensions such as familial, moral and gender identity. Collectively, these developments demonstrate a

clear convergence toward a conceptualisation of identity as multiple, and contextually constituted across the three systems.

7.4 Chapter Conclusions

The analysis shows a clear and shared transition in Ghana, Singapore, and Wales's CEC, towards greater and more complex emphasis on identity and belonging in citizenship education. Over successive curriculum reforms, all three countries increasingly foregrounded identity, moving from earlier nation-centred and occasionally community-based conceptions toward more diverse and multileveled understandings, where nation remains a resilient influence, but where the CEC also encompass cultural, self, social, and emerging global understandings.

Quantitatively, references to identity and belonging rose consistently across reforms, with Ghana and Singapore showing steady intensification and Wales exhibiting more variation but sharp recent increases in 2010 and 2019. Key syllabus mechanism usage reinforced these trends slightly differently, with Ghana and Singapore embedding identity and belonging in KSMs constantly and increasingly, while Wales used fewer mechanisms overall to address identity and belonging, but saw a sharp increase in usage in 2019.

Three substantive findings emerged in this chapter. First, national identity remains a durable anchor in all three systems. Ghana and Singapore explicitly foreground national identity as a stabilising response to globalisation, while Wales embeds national belonging more implicitly through Welsh culture, heritage, and *Cynefin*. Second, cultural identity becomes the most consistently expanding dimension. All three move from marginal or deficit-based treatments to viewing cultural identity as active, plural, and central to learning, with Wales offering the most explicit and theoretically developed framing. Third, self-identity and social belonging gained prominence in later syllabi, reflecting a shift from externally assigned identities toward identities that are relational and internally negotiated. Additionally, explicit global identity appears only recently and tentatively. While global perspectives are present, direct cultivation of global identity remains limited, signalling ongoing tension between national commitments and cosmopolitan aspirations.

Finally, a strong focus on self-identity, alongside a weak focus on global identity, in syllabi that are otherwise internationalised, that is to say, contain a global perspective, suggests, what Dill (2013) described as a global competencies approach (preparation for global competitiveness), over the global consciousness approach (world as one). Overall, the findings indicate convergence toward multileveled conceptions of identity in citizenship education, combining continuity in national identity with broadened cultural, self, social, and emerging global identities.

The following chapter is the last of the thesis, and offer conclusions and final thoughts.

Chapter Eight: Conclusions

8.1 Introduction and Chapter Structure

This concluding chapter draws together the study's findings, reflects on their broader significance for citizenship education theory, research, policy, and practice, with particular attention to the Welsh context.

Beyond this introduction (8.1) the chapter anchors the discussion by revisiting the research problem and methodological approach (8.2), before summarising evidence of convergence and divergence, in both emphasis and meaning, in how citizenship has been conceptualised in the citizenship education curricula (hereafter CEC) of Ghana, Singapore, and Wales over the past three decades (8.3). It situates the findings within key debates on globalisation, postnational citizenship, and national resilience and erosion, outlining the study's original contributions (8.4), and reflecting on the study's limitations (8.5). The chapter continues by locating the findings within the existing empirical literature (8.6) addressing implications for practice (8.7) and policy (8.8), and possible directions for future research (8.9) before concluding with the central argument of the thesis, that global pressures shape citizenship education curricula in convergent ways, but that national contexts continue to exert a strong influence on how citizenship is ultimately framed, leading to convergent but also divergent approaches (8.10).

8.2 Revisiting the Research Problem and Approach

As addressed in Chapter Two, citizenship remains inherently contested (Lister, 1997:1, 2012:373, Kerr and Cleaver, 2004:7, Clegg 2020:15), context dependent (Whitty, 1999:1), and shaped by competing philosophical traditions such as liberalism, communitarianism, and

civic republicanism (Lister, 2007:8, Fouts and Lee, 2005:20). As globalisation accelerates, traditional understandings of citizenship as nationally bound are increasingly being challenged by domestic and international change (Soysal, 1994:1/2). The central debate that has emerged in this context is that of postnational citizenship and its character. Essentially, it asks whether globalisation and migration lead to the erosion of local and national cultures and identities, the acceptance of multiculturalism and cosmopolitan values, such as human rights, or whether it prompts cultural and national resilience.

This study empirically contributes to this debate through its comparative analysis of Ghanaian, Singaporean, and Welsh CEC, showing how their conceptions of citizenship have evolved over the past three decades. The countries included, were chosen to enable a rich, purposive cross-national comparison of how postcolonial nations shape citizenship through curriculum reform. Wales was a required case due to the researcher's ESRC-funded focus, background, and residence, while Ghana and Singapore were selected to provide meaningful contrast in their PESTLE contexts, yet remain comparable through shared anglophone traditions, former British governance, and ongoing national curriculum reform.

The study first established, in Chapter Two, that citizenship is constituted by three core dimensions, *rights and responsibilities*, *participation*, and *identity and belonging*. These dimensions, were used as a framework for analysing the CEC of the three countries, quantitatively and qualitatively, establishing how each included, omitted, framed, and reframed, these core dimensions. To this end the following research questions were operationalised:

1. How is citizenship conceived within the national curricula of Ghana, Singapore, and Wales?
2. How have these conceptions changed during an era of accelerated globalisation (1991-2024)
3. Do these changes reflect convergence in the types of citizens these nations have sought to shape?

The study adopted a cumulative approach to the research question design, in which each question built on the previous one, making research question three the study's overarching aim. Using content analysis, textual analysis, and the innovative key syllabus mechanism

(KSM) analysis, it examined change and continuity in how citizenship and its three core dimensions were emphasised, de-emphasised, and conceptually framed across multiple phases of curriculum reform. The research employed a rare cross-national and temporal comparison of CEC, enabling informed judgements about whether citizenship conceptions in postcolonial curricula are converging. This unusual research design, that also included innovative quantitative techniques, was considered necessary for investigating curriculum convergence particularly in the context of globalisation, as Green (1997:169) explains:

The theory of globalisation is based on revolutionary notions of time and space and how these dimensions are changing in the postmodern world. Its claims, logically, can only be assessed through an approach which is both global and historical, although sadly much of the theorizing to date has been somewhat wanting on both these counts.

Ultimately, the direct answer to the overarching research question is, yes, the findings indicate clear areas of convergence, but also importantly, no, as there are also signs of divergence. The following sections, explore these findings and their relevance.

8.3 Understanding the Findings

This section synthesises the study's quantitative and qualitative findings to explain how CEC in Ghana, Singapore, and Wales have simultaneously converged and diverged over time. It describes the nature of the findings, highlighting two general forms, quantitative and qualitative, where quantitative techniques (Content Analysis and Key Syllabus Mechanism Analysis) were employed primarily to illuminate changing *emphases* on the citizenship dimensions, and where both quantitative and qualitative techniques (Content Analysis, Key Syllabus Mechanism Analysis, and Textual Analysis) were used to reveal transformations in the *meanings* attributed to each citizenship dimension.

8.3.1 Changing Emphases

The study found signs of convergence, as all three countries broadly emphasised and deemphasised the same dimensions of citizenship at roughly the same times over the last

thirty years. References to identity and belonging consistently rose, by contrast, rights references fell in most provisions. Responsibilities and participation mentions presented growth trends across all three countries, before RPP declined in five of the six total provisions analysed, with only Ghana consistently increasing references to responsibilities, and Wales, participation. Broadly however, the countries' trajectories matched. The KSM analysis reinforced these patterns, particularly the long-term decline in rights-related references, and the growing curricular weight placed on identity, and until later syllabi at least, also responsibilities. Wales demonstrated sustained KSM emphasis on participation but a recent sharp decline in references per page (RPP) to the concept, indicated a possible emerging tension, while Ghana and Singapore's core provisions increasingly included participation in its KSMs, but a static or declining use in their extended provisions, again suggesting a possible tension. Combined, the basic content analysis and KSM analysis, showed the three countries CEC broadly emphasise and deemphasise the same dimensions concurrently, reflecting shared international pressures (globalisation). However, the CEC also presented contrasting conceptions of those dimensions, suggesting local and national contexts retain a strong influence on citizenship conceptions.

The exploration of changing emphases was revealing but emphasis alone cannot determine conceptual convergence. While the timing and direction of emphasis largely converged, the interpretations of the dimensions varied, sometimes correlating cross-nationally, and sometimes not, producing simultaneous convergence of emphasis, but both convergence and divergence of meaning. The next sub-section outlines the main points of convergence and divergence in the *meanings* the countries attributed to citizenship in their CEC.

8.3.2 Changing Meanings

The study conceptualised meaning through two complementary lenses, first, the definitional and descriptive messages embedded in the terms, phrases, and ideas used within the CEC were decoded, and second, the relative emphasis assigned to each of the three dimensions were also compared. For example, as emphasis on political participation declined and social engagement rose, the conception of citizenship in the study countries CEC also changed, becoming depoliticized and more socially oriented. Similarly, as curricular attention to identity and belonging rose in all three countries, whilst attention to rights fell across the

board, we can infer that citizenship, is, universally among the study countries at least, less rights aware, but more conscious of their own identities and sense of belonging, wherever that is located, within or beyond the nation. Adopting these two approaches, it was found that meanings diverged most sharply over particularist (national) versus universalist (global) understandings of citizens' rights, and the role of family in responsible citizenship. But convergence was also observed around transitions from political participation to social action, and from monocultural, nation-centred identities to multicultural, multilevel conceptions of identity.

Regarding citizens' *rights*, Wales generally interpreted them universally, through human rights frameworks and reference to supranational institutions of citizenship such as the UDHR and the UNCRC. Ghana included both human rights and constitutional rights, though the former was invariably framed through the lens of rights violations, and the latter ultimately as rights giver. In Singapore, references to constitutional rights have disappeared, and human rights discourse omitted entirely. Recent Singaporean CEC in fact have so few references to rights (under three mentions in the last three syllabi in total), that it is not possible to interpret them as national or universal. In terms of citizens' *responsibilities*, Ghana and Singapore emphasised family and community obligations, while Wales emphasises social, civic, and reflective responsibilities. All three countries increasingly stress personal responsibility, including decision-making, and digital citizenship, though each interprets these concepts slightly differently.

Notions of *participation* were found to broadly converge, in terms of meaning, where despite the conception of citizenship in Ghana reducing and Singapore almost omitting political education, often framing participation in terms of contribution to social or national goals, rather than politically, Wales has maintained a clearer role for political education in their CEC, though recent syllabi frame participation more broadly and link it less explicitly to notions of government, politics, and democracy. All three countries have, nevertheless, increasingly conceived of the good citizen as socially engaged, but not necessarily politically active, although emergent school-based participation efforts, including school councils, and pupil involvement in school decision making, appear in all countries, to varying degrees, depth, and purpose.

Finally, *identity and belonging* was the only dimension where meaning mainly converged, as all three countries transitioned from monocultural to multicultural, and from national to multileveled understandings of citizenship identity and belonging, and though national and cultural identities remained dominant foci, global identity emerged weakly. Thus, while the dimensions followed similar patterns of emphasis, reflecting joint international pressures, underlying meanings often differed, reflecting local and national concerns and contextual dependencies, all of which created a pattern of simultaneous convergence and divergence. Having summarised the study's findings in terms of emphasis and meaning, the next section outlines its original contributions.

8.4 Original Contributions of the Research

This section outlines the study's original methodological and substantive contributions to the fields of citizenship education studies, curriculum studies, and comparative international education.

8.4.1 Original Methodological Contribution

This research implemented two methodological innovations, which it is suggested could be refined and developed in future research seeking to understand curriculum convergence, and curriculum development more broadly.

Firstly, the idea that CEC are becoming more homogenous is not unique in the literature (Andrews and Mycock, 2007:74, Koopman et al., 2012:1204). However few studies have directly compared consecutive CEC empirically from multiple countries simultaneously, which is arguably a necessary approach if convergence is to be demonstrated. Many empirical studies investigate curriculum change either temporally, or cross-nationally, but rarely both simultaneously, meaning conclusions about cross-national convergence are often based on conjecture. This research subsequently developed an approach that combines cross-national and temporal analysis in a single study. This approach was believed to be the best way to assess claims of convergence, not just in citizenship, but in relation to any curricula topic.

Additionally, most studies that examine citizenship education curriculum (CEC) documents, as outlined in Chapter Four, tend to focus on textbooks. Such research is logical and useful, as textbooks provide rich material suitable for both qualitative and quantitative analysis. By contrast, this research examined syllabi, which are less compatible with many traditional analytical approaches such as Discourse Analysis (DA), Critical Discourse Analysis (CDA), or Thematic Analysis (ThA), when studying many different international syllabi from different points in time. The reasons for this incompatibility was twofold, firstly, and pragmatically, a study of multiple syllabi, from multiple countries, from multiple points in time, would require an infeasible effort for a doctoral student to conduct discourse analysis and particularly critical discourse analysis, on them all. In particular, CDA requires an analysis of language in context, which in this study would have meant requiring specialisms in the political, social, and historical contexts of all three countries, over three decades, which were not available to the researcher.

Additionally, as a specific “genre” of document (Fairclough, 2003:17) with unique features that perform particular functions, syllabi are not ideally suited to thematic analysis either. This is because these methods generally do not account for the *location* of a term within a document, beyond its relationship to other terms, and with respect to CDA, the social context in which the text was produced. In textbook analysis, two words appearing in different sections usually carry similar weight, however, in a syllabus, a term appearing as part of a syllabus aim for example, is, it is proposed here, more influential on outcomes, than one found in the main body. Location within the document is therefore important, and a way through which emphasis is created.

The second methodological innovation of this study, accounted for the positioning of words in a syllabus, by identifying and analysing key syllabus mechanisms, or KSMs. This approach has the potential to be refined and adapted by future researchers working with syllabi. It offers a practical way to examine how concepts are emphasised and deemphasised across multiple versions of the same syllabus over time, which is arguably more indicative of the intentions of curriculum makers more than a basic analysis of content. It also enables comparisons of emphasis across different syllabi, cross-nationally, and over time. However, this approach does have limitations. Although many syllabi follow a broadly similar structure (such as rationale, aims, themes), many do not. Even among those that do, it can sometimes be unclear which parts operate as key syllabus mechanisms (KSMs). This was found to be a

challenge with many of the Welsh curriculum documents in this study, as it was not always clear what the aims and themes actually were. Nonetheless, most syllabi contained elements that can be distilled into seven KSMs: scope, rationale, syllabus aims, unit aims, syllabus themes, core concepts, and attitudes and values. It should be acknowledged however, that these mechanisms were developed specifically for this study. Future researchers may wish to develop alternative or more comprehensive categories, possibly even adding weightings.

An example of where this unique technique was fruitful in this research occurred in relation to citizens' responsibilities references, which were variable across the countries. However, the KSM analysis picked up the concerted efforts across the countries to frame citizens responsibilities more strongly, via their inclusion in KSMs, such as the syllabus aims, indicating that actually despite the mixed references, responsibility was an increasingly important dimension of citizenship the countries seek to convey. Both these innovations, whether unique or just rare, offer an alternative way for researchers to approach curricula analysis, especially when attempting to establish convergence. The following sub-section outlines the original contribution to knowledge that these approaches were able to make.

8.4.2 Original Contribution to Knowledge

The study contributes to debates on postnational citizenship, that increasingly reject the simple opposition between national erosion and national resilience, instead emphasising how global pressures interact with national contexts (Bird and Stevens, 2003:395, Brodie, 2004:323, Falk, 2000:5), in a process sometimes described as “glocalisation.” (Ritzer, 2003:193) Building on this perspective, the study's innovative approach shows that Ghana, Singapore, and Wales have broadly emphasised and deemphasised similar dimensions of citizenship education at comparable times, reflecting shared global concerns. At the same time, the meanings attached to these dimensions have both converged and diverged, shaped by distinct national histories and priorities, demonstrating that the impact of globalisation on citizenship education is more nuanced than a binary framework suggests.

Additionally, the research generated new knowledge by comparing current Ghanaian, Singaporean and Welsh CEC as part of its approach. Ghana and Singapore, reflected under researched and over researched contexts respectively, but their inclusion in this study,

alongside the de facto mandatory Wales (due to funding), rest mainly on their suitably contrasting PESTLE profiles, where meaningfully contrasting cases were considered the most likely to generate appropriate findings.

The study is also one of only a few studies to empirically analyse Wales's new *Curriculum for Wales* (2022), directly, as well as Ghanaian CEC more generally (as many do not include analysis of the curriculum documents directly). The study also incorporated Ghana's *Social Studies* (NaCCA, 2024) and Singapore's *Social Studies* (CPDD, 2024), making the study relevant and current. This combination of up-to-date data sources meant the most recent curriculum reforms were included in the analysis. This transpired to be important, as Ghana's *Social Studies* (NaCCA, 2024), somewhat unexpectedly removed all reference to "national identity", despite this having previously been a growing focus, again raising questions about the intent behind such marked changes.

Through the development of methodological techniques and the inclusion of the most up to date information, the study was able to contribute new knowledge to the field of citizenship education studies, cross-national comparative research, and curriculum studies. Building on these methodological and empirical contributions, the chapter now situates the findings within wider theoretical debates on citizenship and globalisation, focussing on each dimension's central finding (8.6). Firstly however, the study's limitations are addressed.

8.5 Study Limitations

This section critically reflects on the methodological and practical limitations of the research and their implications for interpreting the findings. One principle of the interpretivist approach is the recognition that objective truth is never accessed directly, only glimpsed through the subjectivity of the researcher and the limitations of the method. Acknowledging these limitations allows their effects to be mitigated, or at least understood. Four limitations of the research are outlined below and their impact on the research described.

The *continual inaccessibility of historic curriculum documents* was the main challenge faced during this research, and whilst many were able to be accessed after much searching and many requests to relevant institutions, several that otherwise would have been included in this

analysis, were not. Two examples included Ghana's *Social Studies* (CRDD, 2001), and Wales's 2002 version of *ESDGC* (WAG, 2002). It was felt this research would have particularly benefitted from the inclusion of earlier Ghanaian and Singaporean syllabi, as the only syllabi included in the study, implemented prior to 2005, was Wales's *Community Understanding* (CCW, 1991). Including earlier Ghanaian and Singaporean syllabi would have improved the comparability of the CEC provisions, although as it transpired, the key changes identified generally occurred between 2005-2012.

The other central challenge was the researcher's *unequal familiarity with the different national contexts* of the countries under investigation. Whilst being a long-term resident and educator in Wales meant the Welsh context was already familiar, prior knowledge of Ghana and Singapore was limited. To address this, extensive desk research was conducted and knowledge of current affairs in the countries, maintained. Experts were consulted, remotely via zoom, 5,000-word national profiles of all three countries, covering geography, languages, culture, education, economics, and history, to ensure a sound contextual understanding necessary for analysing the countries' curricula, were created and converted into PESTLE audits (Appendices 2,3 and 4) for easier application to the research. Nevertheless, an imbalance of familiarity existed, which must be observed when these findings are considered.

The innovation of key syllabus mechanism (KSM) analysis, whilst enlightening in this study, and potentially useful to others, also had limitations in that several of the Welsh syllabi analysed, were in *a nontraditional format*, meaning it was sometimes hard to discern which parts of the documents corresponded to the seven KSMs the study operationalised.

Finally, CEC documents, as shown in chapter two, are frequently analysed as part of curriculum coherence studies, which essentially assess the coherence between the intended curriculum and the received curriculum. Subsequently, research has focussed on teachers and pupils' subjective interpretations of the intended curricula. That this *study does not address these factors* can be considered a limitation. However, the aim of this study was to understand the intentions of governments, regarding how they conceptualise citizenship, and so a study limited to analysis of the intended curriculum was deemed sufficient. This restricted focus, rendered the inclusion of implementation effects an unnecessary step in the analysis, though this makes a sensible next step for potential future research, which is now discussed before the chapter and the thesis concludes.

Having recognised the study's limitations, the chapter now contextualises the findings in relation to the existing literature.

8.6 Implications for Theory (Situating the Findings)

This section situates the study's findings in the existing empirical literature highlighting their implications for debates on globalisation and postnationalism citizenship.

8.6.1 From Rights-Awareness to Responsible Citizenship

The research highlighted a clear re-conceptualisation of citizenship in the CEC of Ghana, Singapore, and Wales, all of whom increasingly deemphasised *citizens' rights*, whilst increasingly emphasising on *citizens' responsibilities*. This shift reflects not merely curricular adjustment, but a broader transformation in how citizenship itself is being understood.

Across all three contexts, traditional liberal citizenship, centred on notions of individual rights and freedoms, has been progressively deemphasised. Instead, citizenship is increasingly framed through obligation, conduct, and responsibility. This finding contrasts directly with Gonzalez et al., (2004:301), who argued that liberal rights “far outnumber concepts associated with classical republicanism or communitarianism” in citizenship education, though their study was of the USA. The present study however supports the argument that citizenship is less concerned with rights, and more concerned with responsibility. This reorientation toward responsibility seems to reflect growing communitarian and civic republican influences. Communitarian perspectives view the citizen's responsibilities as socially rooted and oriented toward the welfare of the community (Etzioni, 2011), while civic republicans emphasise political duties such as preserving democracy and engaging in public deliberation (Dagger, 2002). Although both frameworks foreground responsibility, the CEC analysis shows that political responsibility has weakened relative to social and personal responsibility.

Despite converging trends, national contexts remain central in shaping how rights are interpreted. The biggest cleavage in this respect, was that human rights were prominent in

Ghanaian and Welsh curricula but entirely absent in Singapore's. Even where present, rights were framed differently. Ghana approached human rights pragmatically, focusing on recognising and preventing abuses, an orientation shaped by ongoing national challenges where rights abuses continue to be a significant nationwide problem (Amnesty International, 2025). Wales, in contrast, framed rights analytically and universally, frequently referencing supranational frameworks such as the UDHR and UNCRC, and aligning strongly with Westheimer and Khane's (2004) "social-justice oriented citizen". Singapore's general absence of a human rights discourse, and its presentation of rights solely as constitutionally derived, is partly explained by its authoritative government and long-standing rule by the PAP (or People's Action Party) since 1965. This absence also explains why postnational conceptions of citizenship, often associated with human rights, were evident in Ghana and Wales but not Singapore.

Regarding citizens responsibilities, all three countries strongly emphasised social and civic, reflecting communitarian concerns with social cohesion and, contemporary concerns about declining social capital (Putnam, 1995). This trend aligns with research identifying a growing responsabilisation of citizenship (Swanson and Ashby, 2016, Tan et al., 2018, Ghebru et al., 2020), often favouring social responsibilities over political ones. At the same time, there has been an increased focus on personal responsibility, particularly in relation to decision-making, and digital citizenship. However, Westheimer and Khane (2004:5) warned, a focus on shaping "personally responsible citizens" is an "inadequate response to the challenges of educating a democratic citizenry." Nevertheless, personal responsibility was regularly addressed and primarily framed as an individual activity in Ghana and Wales, whilst in Singapore, it was framed communally, reflecting Confucian and socially oriented philosophies, that other researchers have also found, influence regional curricula (Tan, 2018, Sim and Chow, 2019, Wang, 2025). Though the growing emphasis on autonomy, competence, and responsible self-management also suggests neoliberal influences, also a common finding in empirical studies of Asian CEC (Kwan-Choi Tse, 2011, Choi and Kim, 2020, Wang and Print, 2024) but also more broadly, as Engel's (2014) study of Spanish curricula showed.

Across all three postcolonial countries, the responsible citizen emerged as a "social creature" (Berry, 1982:234), and a more central focus of citizen shaping efforts, where citizens' obligations were framed primarily in communal terms. However, the simultaneous decline in political responsibility is particularly significant, reinforcing concerns about political

disengagement, particularly among the young (Grassi et al., 2024:584) and lending weight to critiques of diminishing political agency in contemporary citizenship education (TG Tin, 2006, Alviar-Martin and Baidon, 2016, Tan et al., 2018)

Finally, differences in how law and justice were framed, further illuminated the type of citizen each country sought to shape, with Ghana and Singapore largely presenting law as disciplinary and behaviour-regulating, whilst Wales framed it as emancipatory and enabling, coupled with the strong focus on citizens' responsibilities in Ghana and Singapore, the findings broadly reflect Westheimer and Kahne's (2004) distinct citizen types, the "responsible citizen" (Ghana and Singapore) and the social "justice-oriented citizen" (Wales).

Overall, the research highlighted how the countries CEC now prioritises socially embedded, personally responsible, but increasingly depoliticised citizens. These hybrid forms ultimately, reflecting global pressures, and how they are refracted through national cultures and political traditions, producing distinct but convergent models of citizenship (Ritzer, 2003:193). In a consolidatory finding, discussed in the next sub-section, the transition from political to social also presented in relation to conceptions of participation.

8.6.2 From Political Participation to Social Action

This sub-section shows that participation, long considered a defining feature of citizenship, is being reframed, from participation as a political practice tied to self-governance, toward participation conceived socially and morally, detached from formal politics. Although the level of curricular emphasis on participation varied, all three countries were found to increasingly emphasise the concept overall, indicating that participation has become a more important element of good citizenship in all three contexts. This trend is likely to appeal to communitarians, as participation in Ghana and Singapore, and to a lesser extent Wales, is mainly framed socially, rather than politically. Encouraging this form of community engagement may also resonate with those who argue that declining social participation is undermining democratic societies, particularly in the West (Putnam, 1995).

These findings align with a substantial body of empirical literature that identifies political participation to be a shrinking focus within citizenship education, in Singapore (TG Tin, 2006, Tan et al., 2018) but also more widely. For example, Mickovska-Raleva (2019) found Macedonian civic education lacked content “likely to lead towards an effective development of democratic and participative practices” (2019:108). Tooth (2008) also observed a long-term drift in Manitoba away from political participation and toward social integration.

Over the study period Wales maintained explicit references to politics and political participation, although the *Humanities AOLE* (WG, 2019) decoupled these two notions (participation from politics), presenting politics alongside other lenses (social, moral, legal, economic) to be considered, but crucially not mandated, often in unelaborated lists, unrelated to citizen participation, effectively rendering less important the goal of fostering political participation. Similarly, Ghana measurably reduced political education or GPD content, while Singapore largely omitted it altogether. Collectively, this suggests a convergence toward conceiving citizenship as a non-political status and practice, an understanding fundamentally at odds with the Athenian conception of citizenship as participation in self-governance (Turner and Isin, 2002:106). This depoliticisation echoes findings from numerous studies. Ersoy (2013) found Turkish textbooks offered limited opportunities for developing political literacy and participation (2013:137). Wahnig (2016) showed that German citizenship education prioritised personal responsibility over “truly political participation” (2016:244). Perveen and Awan (2017) reported a “very poor situation” regarding political literacy in Pakistan (2017:187). More directly relevant, in 2016 Alviar-Martin and Baildon demonstrated that Singapore’s curriculum promoted a “depoliticized” citizenship that was more “moral rather than political” (2016:2), a concern echoed by Leung (2014:279) in their study of several Western democracies.

This study reinforces these critiques. Political participation, where acknowledged, is defined narrowly, most commonly as voting, mirroring Gonzalez et al’s (2004:301) finding that participation beyond voting “plays a very small role.” Instead, schools have themselves become possible proxies for participation through student councils and decision-making exercises. While valuable, Biesta (2008) cautions that such approaches may privilege the social over the political, leaving students underprepared for democratic citizenship in pluralist societies (2008:38).

Additionally, a useful lens for interpreting differences in meaning is Arnstein's (1969) ladder of participation, which distinguishes between substantive participation and tokenistic forms, ranging from full citizen control to manipulation, respectively. Applying this framework to the findings highlighted the importance of language. Ghana and Singapore consistently framed the active citizen in terms of "contribution," while Wales favoured "participation." This distinction is significant, as "contribution" implies a one-way, goal-oriented action, whereas "participation" suggests interactional, process-based engagement. As a result, the Welsh curriculum appears more genuinely participatory, while the Ghanaian and Singaporean curricula risk positioning citizens as contributors *to* the state rather than participants *within* it.

Overall, the research shows strong convergence around social and community participation and an erosion of political participation. Citizenship is increasingly framed as social engagement rather than political agency. When combined with findings on rights and responsibilities, and viewed through Westheimer and Kahne's (2004) typology, Ghana aligns most closely with the personally responsible citizen, Singapore with the socially participatory (but depoliticised) citizen, and Wales with the participatory and social-justice-oriented citizen. While each curriculum contains elements of all three types, conceptions of participation have shifted decisively from social-political toward predominantly social, revealing a fundamental transformation in what it now means to "participate" as a citizen. The next sub-section considers the shared transition the countries experienced from nation-bound monocultural conceptions, to understanding citizenship identity and belonging as multileveled.

8.6.3 Toward Multilevel Citizenship Identities

Identity and belonging showed clear convergence across Ghanaian, Singaporean, and Welsh CEC, which increasingly incorporated cultural, social, and emerging global identities alongside national identity, reflecting a shared shift toward plural, socially constructed understandings of citizenship under conditions of diversity (Kymlicka, 1995) and "accelerated globalisation" (Tomlinson, 2007:410, Tuncer, 2023:87), aligning with arguments of national resilience, over national erosion, in debates about postnational citizenship, though, again, elements of both presented.

The clearest and most consistent transition concerned cultural identity. Early curricula, particularly Ghana's *Social Studies* (CRDD, 2007), framed culture, partially in marginal or deficit terms, portraying Indigenous identities as “lost” or problematic and reflecting assimilationist orientations. From 2019 however, in Ghana, cultural identity was reframed positively, emphasising belonging, respect for diversity, and culture’s role in shaping identity, bringing it in line with the Singaporean CEC analysed. Wales demonstrated the most sustained engagement with the concept, embedding cultural identity through heritage, language, diversity, and the concept of *Cynefin*, and presenting identity as multiple and socially constructed. Across all three contexts, cultural identity shifted from a peripheral concern to a central organising feature of their CEC, reflecting the increasing multiculturalism in western liberal democracies (Kymlicka, 1995:Back Cover), and the challenge this poses, when considering universal liberal notions of rights (Joppke, 2002:245).

Alongside this, self-identity became more prominent, whereby Ghana's *Social Studies* (NaCCA, 2020) introduced an explicit focus on understanding oneself as a unique individual, though this emphasis weakened in 2024's revised syllabus. Singapore developed a formalised conception of self-identity in relation to society, particularly in *Character and Citizenship Education* (SDCD, 2021), framing identity through reflection and social relationships. Wales similarly integrated self-identity from 2008 onward addressing both personal development and socially situated identity contexts, most notably in *Personal and Social Education* (WAG, 2008). A focus on self, not just in relation to identity but more broadly around individual capacity building, is arguably an expression of global citizenship, and more specifically a global competencies approach (Dill, 2013), that recognises the importance of flexible and adaptable human capital in a knowledge-based economy. At the same time, community belonging has been consolidated across all curricula, reflecting communitarian principles, albeit conceived slightly differently, where contrastingly Ghana increased emphasis on family belonging from 2020 onward, in addition to its existing community focus. Singapore consistently foregrounded community loyalty, cohesion, and contribution as central to identity formation, whilst Wales embedded belonging within *Cynefin*, linking personal identity to place, heritage, and social relations. Nevertheless, the shared growing emphasis the countries placed on social belonging, reinforced conceptions of the citizen as socially embedded rather than individually formed.

Perhaps the most important question the research explored was, which identity do the countries seek to foster most, national, or global. The study showed that while global identity begun to emerge in all three countries, it remains cautious and marginal relative to national identity, echoing findings from Ghana (Arnot et al., 2018, Osman and Mensah, 2020, Osei-Owusu, 2020), Singapore (TG Tin, 2006), and more widely (Silman and Caglar, 2010, Law 2013, Patterson and Choi, 2018) all of which identified *a* global perspective to the provisions they analysed, but observed a prioritisation of national interests.

The research uncovered a further distinction, illustrating how all three countries CEC's global perspective mostly served pragmatic purposes, preparing citizens for global economic participation, more so than fostering cosmopolitan identities. This aligns with neoliberal conceptions of the "economic citizen" (Crowley and Swan, 2018) and comparable findings in Law's (2013) analysis of Chinese curricula. In terms of Dill's (2003) distinction of responses to globalisation (global competencies and global consciousnesses) explained in chapter three, the research found more evidence of the former, suggesting governments' intentions were more pragmatic and economic, than universal and egalitarian. The tentative emergence of global citizenship identities may signal a transition toward the globalisation of national identities (TG Tin, 2006), but future curriculum analysis is needed to determine whether this trend will strengthen or decline.

By contrast, national identity remained a consistent feature of the countries CEC. Ghana and Singapore strongly reaffirmed national belonging, even explicitly in response to globalisation. Ghana's curriculum historically promoted patriotism and national unity, responding to a perceived "loss of true identity" (CRDD, 2007:6), though the 2024 syllabus suggests emerging tensions through the omission of explicit references to national identity. Singapore consistently foregrounded national identity through aims, values, and emotionally grounded narratives of loyalty and nation-building, aligning with findings from other studies of the Asian context (Morris et al., 2013), whilst Wales articulated national identity more subtly, through heritage, language, and belonging, particularly in the *Humanities AOLE* (WG, 2019), having emphasised the national-cultural aspects of life in Wales in earlier *Developing the Curriculum Cymreig* (ACCAC, 2003).

Overall, the predominant focus on national over global identity reinforces Ang's (2014:10) observation that "...the more global the world becomes, the more insistent particular

differences, especially of the nationalist kind, are being articulated...”. The findings also support wider evidence that globalisation can strengthen rather than erode national identity (Ricupero, 2008). The research also illuminated a shared transition in the countries CEC, away from monocultural national identity toward multileveled citizenship identities (Mass, 2013), pluralised identities, while retaining strong national anchors. In this regard, citizenship is increasingly understood as the negotiation of multiple forms of belonging, including, familial, communal, cultural, national, and, to a lesser extent, global, confirming patterns identified in studies such as Moon (2013) and Lowri-Roberts (2023). Furthermore, that frameworks of self-identity, and multiple identities, have emerged to add coherence to these changes, aligning with postnational understandings of citizenship as identity and belonging, situated both within and beyond national boundaries.

Having explored the theoretical implications of the findings, the chapter next considers their significance for educational practice.

8.7 Implications for Educational Practice

The next two sections consider the implications of the study for the education sector. This section explores the practical implications of the study’s findings for teachers and learners, primarily in Wales but with broader relevance.

8.7.1 Implications for Practitioners (Teachers)

This sub-section outlines key implications of the curricula changes the study uncovered, for the practice of citizenship education, primarily for the Welsh context but also more widely. To clarify, the study did not examine enactment, or the subjective experiences of curriculum stakeholders, namely teachers and pupils, so the following discussion can only be speculative, hence why it is presented in the conclusion chapter.

Whilst not a specific focus of this study, the curriculum implementation timelines in chapter four clearly illustrate the frequency with which CEC are being reformed is accelerating in all three countries. As a former teacher who has experienced curriculum reform as a practitioner,

I would be concerned with this trend, given the known challenges teachers are already facing, financially, materially, and in terms of workloads. A recent survey showed 41% of teachers (National Education Union Members) described their workloads as “unmanageable” (National Education Union, 2026). The survey also cited “government-driven” factors such as inspection as the cause of the unmanageable workloads but did not address curriculum reform. Regardless, the study found the “overriding cause [was] poor work-life balance brought on by high workload.” Additionally, the Institute for Fiscal Studies reported this year, that:

School absences remain 50% higher than in 2019, Welsh school pupils have seen their performance fall in internationally comparable tests, and the share of young people staying in education post-16 is lower now than 10 years ago. (Brogard et al., 2026: Paragraph 2)

Around the world, and particularly in Wales, schools are facing financial, material, and frankly good-will related challenges, that Covid-19 exacerbated. Successful curriculum implementation requires vast collective efforts and resources. If these trends continue, the consequences of more frequent reforms could be detrimental and will certainly add pressure to those already “unmanageable workloads”.

Another key implication is that Wales’s new *Humanities AOLE* (WG, 2019), which frequently instructed a political perspective should be brought to a range of learning scenarios was often, as already shown, unelaborated, in list format, commonly with, social, economic, environmental, technological, and legal perspectives for example. This permits a wide range of teaching and topics, but mandates none, and so in Wales, schools and teachers, the new curriculum designers, should use their newfound autonomy over curriculum development to ensure an appropriate political education component is included. Furthermore, the importance of engaging in politics, governance, and democracy, beyond just voting, should be highlighted, and encouraged.

Participatory teaching was encouraged, but this pedagogy must not be confused with citizen participation, or even pupil participation in school life as a citizen of the school. Perhaps the difference between the two could be clarified in the curriculum documents. Finally, as curricula are increasingly engaging with concepts of cultural diversity, it is suggested

mandatory CPD training be provided. This was a universal finding, and so this recommendation applies to Ghana and Singapore as well as Wales.

8.7.2 Implications for Future Citizens (Pupils)

The ways in which teachers interpret CEC, can be key to its success or failure in delivering intended outcomes. This is also true of the interpretations of pupils who receive citizenship education. Subsequently this sub-section addresses the implications of the curricula changes uncovered, on pupils and by extension, future citizens. The sub-section essentially asks, what kind of citizen are these curricula likely to produce, making use of Westheimer and Khane's (2004) typology to frame some of the discussion.

Broadly speaking the research has several possible implications for pupils, and by extension, future citizens. Perhaps the most important, certainly to civic republicans, is that based on the trends identified, future citizens in all three countries are likely to be less politically literate, and subsequently, less politically engaged, at least in conventional means. The fading political perspective in their CEC permits teachers who find it difficult to simply ignore, omit, or work around including it in their teaching. This is a concern, as Pace and Oberholzer (2022: Paragraph 1) explain "Teachers and teacher educators often find it difficult to explore controversial issues in their classrooms, especially in politically fraught times" such as these. If teachers are inclined to avoid political education, or are not required to engage with it, this risks a generation of politically illiterate and passively engaged citizens.

The study also found a growing focus on responsible social citizenship and social action, which could lead to future Ghanaian, Singaporean and Welsh citizens becoming more socially active, participatory, and community-minded, reflecting Westheimer and Khane's "participatory citizen", the social interpretation. In Wales, future citizens raised on the current curriculum may differ from their Ghanaian and Singaporean counterparts, as they will also be socially "justice oriented" (Westheimer and Khane, 2004). Where Ghanaian and Singaporean future citizens will be socially fluent, Welsh citizens may be able to apply social critique more adeptly.

Due to the growing curriculum focus on cultural identity, multiple identities, and recognising and respecting one another's identities, future citizens in all three countries have a better chance of living in harmonious relationship with each other, particularly as countries become more diverse, and migration continues. This seems particularly important in Wales, given increases in reported hate crime (BBC, 2025).

A central enquiry of this research related to the national-global dichotomy and whether citizens are more nationally or globally aligned. In this respect, all three countries citizens are likely to continue to develop, at least an awareness, if not an identity, which is nationalistic in orientation, particularly over a global equivalent. This, in and of itself, is un concerning. If however, we consider the rising forms of negative nationalism prevalent in western societies, this could appear to consolidate or confirm some of the more xenophobic and extreme positions. Pupils need to be able to discern between positive and negative forms of nationalism.

The remainder of this sub-section addresses some general issues highlighted through the course of the research. Firstly, when considering the potential implications of the research on pupils, I am drawn to my own experiences as a teacher. My lowest attendance rates were for citizenship education subjects, it engaged pupils the least of any subject I taught, which over a decade, has been many. Most students complained about the rationale of the subject, and could not understand why they had to study citizenship. In maths the rationale was to add up and take away, that made sense to them, English, to learn how to spell and read, again that made sense, but when it came to citizenship, there appeared a significant disconnect between what the subject was trying to achieve, and what students thought it was about. Citizenship education is a vital component of a balanced curriculum, though in my experience, pupils have sometimes developed a combative stance towards it. The holistic nature of the new curriculum in Wales could very well circumvent this problem, through its embedding of citizenship goals throughout, provided schools balance their own citizenship education component to address all three dimensions of citizenship, as identified here.

Additionally, like teachers, pupils can be negatively impacted by the increasing pace of curriculum reform. The quality of educational provisions may suffer if schools are not permitted the necessary time and resources to implement curricula effectively, and that means, its assessment too. This takes time. The lengths of time in between some of the

reforms considered here is clearly reducing, most recently just literally only a few years. Such an increasing frequency will likely negatively impact both teachers, and consequently, pupils – i.e. future citizens.

Beyond classrooms and learners, the trends identified also raise important questions for curriculum and education policy, which the next section addresses.

8.8 Implications for Education Policy

This section addresses key implications of the research for educational policymakers, beginning with recommendations to seek to achieve balance between efforts to shape rights-oriented and responsible citizens, moving onto the challenge of political education, and how to include it appropriately and uncontroversially, before offering a recommendation on how policymakers can respond to rising tensions between nationalists on the one hand, and globalists on the other, particularly in relation to identity and belonging. The section is rounded off with several general recommendations, which were not citizenship dimension-specific, but rather could be more broadly applied, including, to reconsider the role of “powerful knowledge”, and to avoid ambiguity by providing detail.

8.8.1 Balance Rights-Awareness and Responsible Citizenship

Curriculum makers generally, but those in Ghana and Singapore specifically, should seek to imbue balance into their CEC when it comes to shaping responsible and rights-aware citizens. They could also embed both concepts in the more directive syllabus aims equally, which should inform pedagogy and assessment, and provide a target against which learning can be measured. However, if rights or responsibilities do become stated aims, countries should ensure they are operationalized in content and not present as isolated and tokenistic (as was the case with Singapore in this study).

Additionally, regarding human rights and the human rights framework, specifically the Universal Declaration of Human Rights (UDHR), which all three countries endorse, and the related treaties and conventions that Singapore has been reluctant to ratify (UNHRC, 2011:2),

the Singaporean CEC, although reflecting the country's broader approach of not formally recognising human rights, could nonetheless consider incorporating these principles. Ghanaian curriculum makers may also wish to consider the particular balance between rights and responsibilities in their CEC, as it also becomes less rights focussed.

In Singapore, the isolated curriculum aim, in the country's most recent syllabus analysed, *Social Studies* (CPDD, 2024), having been retained but not developed across three separate reforms, could be developed, linked to human rights, or if the country wishes to continue its current approach, to increase rights content more broadly. The trouble with not knowing one's rights for the individual may be problematic, but this is true for society also, as rights are likely to be infringed and entitlements unprotected if no knowledge of those rights exists among the rights holders.

A further recommendation relates to the individual and collective nature of decision-making as fostered in the CEC. Although a unified curricular focus has emerged on decision-making, it is predominantly conceived as individualised activity. Only in Singapore were references to collective decision-making regularly found. This likely reflects, as pointed out, the influence of more communally based Asian philosophies. However, the current political climate in many liberal democracies is one of division and an inability for those with differing political views to communicate, let alone deliberate issues. This is proving to be one of, if not *the* central challenge to democracy as an institution today, a challenge that requires attention. The recommendation of this study then, based on the findings presented here, is that educational policy makers in Wales and Ghana, but also more broadly, may wish to include a focus on collective decision-making in the curriculum, for balance. This will hopefully have the effect of developing the deliberation skills of future citizens. Importantly, this is already present in experiential and participative form, via the school councils and the participation of pupils in school-based decision making, but a formal recognition of collective decision-making as knowledge to be imparted, within the syllabi themselves, maybe as core concepts, would consolidate the idea that societies have to make collective decisions, and reduce the potential for miscommunication.

Finally, if global responsibilities are to be fostered, it may help to also seek to inculcate a collective global citizenship identity, and a sense of belonging that transcends national boundaries, in order that the motivation for citizens to fulfil their 'global' responsibilities can

also be developed. Developing a sense of belonging and identity at a national level, whilst identifying challenges that require a coordinated global response, like climate change, potentially reflects a tension, or at least a misalignment of citizenship goals.

8.8.2 Stem the Fading Focus on Fostering Political Participation

Another challenge for policy makers relates to falling political participation, where the findings of this study may raise concerns. A healthy democratic society has engaged, politically literate citizens. Any deemphasis on this aspect of citizenship, as was found strongly in Singapore and to a lesser extent Ghana, but also in Wales, risks undermining democracy and further isolating average citizens from the very self-governance which is at the core of civic republicanism conceptions of citizenship.

Curriculum and educational policy makers need to consider increasing the amount of political education in their CEC, and include efforts to foster political participation, even if just narrowly. Key syllabus mechanisms, particularly syllabus aims, could be employed to this end. For the Welsh context specifically, additional guidance could be offered on the new curriculum's political education component, as currently few details and little clarity is offered in the *Humanities AOLE* (WG, 2019) syllabus. This is a challenge for policy makers.

The 2026 Senedd elections recorded the highest turnout in its history, of 51.72% (Wales Online, 2026b:No page No.), rounded up, that is 5% higher than 2021 (47%), demonstrating a growing appetite within the Welsh public to engage in the political process. However, a troubling 14% of 11–25-year-olds in Wales knew about the election (The Electoral Commission, 2026:Title). Furthermore, despite 16- and 17-year-olds now being able to vote, they registered “the lowest willingness to vote across all four UK nations.”. What is required then, is better and more clearly elaborated political education, not fading and ambiguous political education. Ultimately “72% of young people in Wales want more democratic education in school” (The Electoral Commission, 2026:Title). This is clearly a challenge for educational policy makers in Wales, for Welsh society broadly, but also for Ghana and Singapore. A recommendation of this study is for Wales in particular, to offer additional guidance, until the next curriculum reform, where more detailed and elaborated political

education could be included, and explicit expectations of political participation foregrounded, maybe in key syllabus mechanisms (KSMs).

An associated issue is that Wales's current curriculum allows teacher's autonomy over content selection. Contrastingly, Ghanaian syllabi were overly prescriptive. These two extreme positions can be problematic, the former for not ensuring a universal content provision, and the latter, for not allowing room for the type of flexibility required to accommodate local contexts. Ghana's curriculum in this sense was inflexible, but things are changing. It is recommended this continue, particularly as tribal differences that still influence modern Ghana likely mean different locationally specific educational needs, and ways of understanding.

8.8.3 Managing a focus on Identity and Belonging in Polarised Times

If the trends identified in this study continue, Identity and Belonging could become a dominant focus in the curriculum of the three postcolonial countries, possibly marginalizing other dimensions. Rights references have been trending down for some time, and participation and responsibilities references also downturned.

In recent Welsh CEC belonging has been linked to place, heritage, and social relations, via the concept of "*Cynefin*", though it somewhat overlooked the role of the family in creating a sense of identity and belonging for the contemporary Welsh citizen. Welsh policy makers may wish to revise the role of the family, and 'borrow' a familial component from Ghanaian and Singaporean curricula. It was recently reported by *Children in Wales* that "A strong stable family and good education are key components for a child's health, well-being and future prospects." (PHWO, 2025:3) but that not only are traditionally understood familial problems in Wales increasing, they are "becoming more complex" whilst new problems are also "emerging". These problems, ranging from the regulation of emotions, behavioural outbursts, and anxiety, to self-harm and abuse, could be tackled by an appropriately developed family education component of the curriculum, similar to provisions in Ghana and Singapore, only tailored to the Welsh context. Whilst some accounts position family outside of civil society, others include it firmly. Either way, citizenship education in Wales could address family,

partly for the reasons above, but also because, as Power et al (2018:194) succinctly assert “changes in the family change civil society, and changes in civil society change families”.

8.8.4 Teacher Autonomy, Powerful Knowledge, and the Risks of an Under-Prescribed Curriculum

In Wales most recent curriculum, and particularly the *Humanities AOLE* (WG, 2019), the drive to increase teacher autonomy, has meant, a scaling back of prescribed curriculum content. However, this can lead to problems. Pupils attend schools to access and acquire “powerful knowledge” (Young, 2013), though syllabi that lack detail, where knowledge is not delineated beyond references lists, risks overlooking this need.

Firstly, “Powerful Knowledge”, popularised by Young (2013) and critiqued by Beck (2013), refers to the idea that not all knowledge is equal and that we go to school to receive knowledge we ordinarily would not be exposed to in our day to day lives. This is “powerful knowledge. Curriculum makers in Wales, at a national, but also now at the school level, should aim to include specific and essential knowledge, though determining what that would be is a different debate. The inclusion of “powerful knowledge” would improve a curriculum that has been criticised for its lack of prescription. The Institute for Fiscal Studies for example report that “The new Curriculum for Wales should place greater emphasis on specific knowledge” (Sibieta, 2026).

An associated suggestion would be to avoid ambiguity and to be explicit and detailed in definitional and descriptive content. Developers of national CEC could avoid the challenges posed by citizenship’s contested nature by including detailed, comprehensive definitions in the introductory sections of their syllabi. Although some do provide such definitions, they are often quite narrow. Adopting a broader definition, one that fully addresses all three dimensions of citizenship, would help ensure these dimensions are properly integrated into the curriculum. The *Humanities AOLE* (WG, 2019) has gone some way to addressing this by including a glossary, but it does not include a definition of citizenship, and regardless is peripheral. The recommendation here, is for clear, detailed definitions, within the core of the syllabus itself to be provided.

As well as considering the implications of the research for policy and practice, discussed above, it is also necessary to consider future research opportunities, addressed in the next section of this thesis.

8.9 Opportunities for Future Research

This section will outline key directions for future research, building on the study's findings, methods, and acknowledged limitations. Following the analysis of the intended curriculum, a clear priority for future research will be the undertaking of coherence studies. In addition, for curricula that are still in the process of being rolled out (as is the case in Wales and Singapore), implementation studies will be particularly appropriate. Both forms of investigation will be essential to developing a fuller understanding of the Welsh curriculum and are therefore strongly recommended.

Future research will need to examine the enactment of the curriculum through the subjective interpretations, experiences, and perceptions of key stakeholders, most notably teachers and pupils. Such enactment-focused research should form a central component of both implementation and coherence studies, which are widely recognised as crucial stages of curriculum research. This will be especially important in the Welsh context, where the new curriculum is characterised by relatively low levels of prescription and has been criticised for its lack of “specific knowledge” (Sibieta, 2026). As Glover has observed, it will also be “critical to examine individual school curricula specifically, once they are written” (Glover, 2023: 1). This will be particularly pertinent given that teachers in Wales have been granted not only increased autonomy, but also a *Humanities AOLE* (WG, 2019) syllabus that permits a wide degree of interpretation, potentially resulting in significant variation between schools.

Future research will also be able to build on the methodological contribution of this study. Section 8.4 introduced KSM analysis as an innovative methodological approach designed specifically to analyse syllabi as a distinct documentary genre (Fairclough, 2003) and to capture more nuanced forms of conceptual emphasis. This technique could be further developed through application to a wider dataset, refinement of analytical categories, or the introduction of differential weightings. For example, future studies might distinguish more

clearly between conceptual references located in syllabus aims, arguably more directive of intended outcomes, and those found within unit aims, themes, or core concepts, for example. Additionally, the temporal cross-national research design employed in this study, while methodologically challenging, demonstrated its suitability for assessing claims of curricular convergence. This approach could be applied in other geographical contexts, with different cohorts, and curricular areas, at sub-national as well as national levels.

Finally, future research will have opportunities to extend and deepen intercontinental comparative analyses. This study was unusual in including an African country within a cross-national comparison, highlighting both an underrepresentation and an opportunity within the field. Future research should continue to incorporate countries that are currently marginalised in comparative curriculum studies. Cross-national research has the potential not only to illuminate difference, but also to support curriculum improvement through processes of curriculum borrowing. African nations should therefore be included as equal participants in this mutually beneficial exchange.

With these directions for future research outlined, the chapter will conclude by returning to the study's overarching aims and summarising its key conclusions.

8.10 Conclusions and Final Comments

This thesis set out to examine whether globalisation has driven convergence in how citizenship is conceptualised within citizenship education curricula (CEC) of three postcolonial countries, and whether national contexts continue to shape those conceptions, particularly during accelerated globalisation. Through a rare cross-national and temporal comparison of curricula from Ghana, Singapore, and Wales, the study demonstrated that the countries' CEC has indeed converged in important ways. Across all three contexts, curricular emphasis has shifted away from rights-based and politically oriented models of citizenship toward forms that prioritise responsibility, social action, and identity and belonging. These shared trajectories reflect common global pressures, including economic globalisation, social diversification, and concerns about social cohesion, supporting claims that citizenship education is increasingly shaped by transnational forces.

However, the study also showed that convergence in emphasis does not necessarily equate to convergence in meaning. National histories, political traditions, and cultural priorities continue to exert a powerful influence over how citizenship is framed, producing distinct curricular interpretations. Wales largely advances a social-justice-oriented and rights-based conception of citizenship, Ghana foregrounds responsibility and communal belonging within a constitutional framework, and Singapore promotes a socially participatory, yet explicitly depoliticised model centred on contribution and national cohesion. Together, these findings challenge binary accounts of postnational citizenship as either national erosion or national resilience. Instead, the thesis advances a more nuanced conclusion, that citizenship education is being reshaped through processes of convergence and divergence simultaneously, as global pressures interact with enduring national contexts. In doing so, the study contributes empirical evidence to debates on postnational citizenship, curriculum convergence, and the evolving purposes of citizenship education in postcolonial settings.

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Appendix One: International Curriculum Map – Documentation Availability and Coverage

International Curriculum Map – Documentation Availability and Coverage								
Country & (If applicable the state/Region/Province)	Curriculum Name and Applicable age-range	Central Curriculum Document &/OR Central Curriculum Website	Curriculum Framework(s)	Relevant subject OR Learning Area documents (Citizenship, Social Studies and Humanities)	Current Curriculum and year(s) of most recent reform	Pertinent Links on host site and Other hosted documents	Existing and Ongoing Research (Comparative – Curriculum – Document-based)	Notes and key points:
R. Ireland (Nationwide)	4 Curriculum phases, called. Early Childhood Early Childhood (curriculumonline.ie) Primary Primary (curriculumonline.ie) Junior Cycle Junior cycle (curriculumonline.ie) Senior Cycle Senior cycle (curriculumonline.ie)	Not available as single doc – (A combination of the Junior Cycle Framework and the CSPE short course specification are required to determine the citizenship provision), available at Home (curriculumonline.ie) Main curriculum website is Home (curriculumonline.ie)	Framework for 'New Junior Cycle' Framework-for-Junior-Cycle-2015-2 NCCA (11-15 year olds) There is also a 'Primary Cycle' (<11) and a 'Senior Cycle' (15-18)	Now Citizenship Education is covered in Geography and History respectively JC_Geography-en.pdf (curriculumonline.ie) Junior-Cycle-History-Specification.pdf (curriculumonline.ie) As of 2016 a short course in Citizenship education has been available on the junior cycle, called 'Civic Social and Political Education	Curriculum revised and implemented from 2014 onwards Beginning in September 2014, the new junior cycle began to be phased in. This revision featured subjects and short courses, a focus on literacy, numeracy and key skills, and new approaches of assessment and reporting Schools now have more freedom to design junior cycle programmes that meet the learning	Link to the now defunct Environmental and Social studies (ESS) which was removed from the Junior Cycle Curriculum in 2018 –PGImage (curriculumonline.ie)	2020 - Curriculum change in Australia and Ireland - Gleeson. 2018 - Curriculum reform in Irish secondary schools a focus on algebra - Prendergast and Treacy 2018 - Time to reflect: Lessons learned from an Irish Curriculum Reform – A O'Meara - Findings: Curriculum developers should include 'Guided Learning Hours' Association of Secondary teachers Ireland (ASTI) not happy with 'move away from knowledge delivery' BUT commends the focus on 'skills' and 'Active Learning' (Gleeson et al 2020)	-More freedom for schools and teachers to choose content and methods -The Junior Cycle caters for students aged from 11 to 15 years and students normally sit the exam at the age of 14 or 15, after 3 years of post-primary education. -However, the Junior Certificate is not limited to post-primary school students - Schools have the flexibility to adapt any NCCA short course to suit their particular needs and school context -schools also allowed to develop their own short courses

	Junior Cycle is a mix of subjects and short courses as well as other learning experiences.			(CSPE) – A Citizenship Course: 2016-Junior-Cycle-Short-Course-CSPE-EN.pdf (curriculumonline.ie)	needs of all students.		2008 – Teaching and Learning International Survey (TALIS) (OECD 2009) found that Irish teachers favour ‘transmission’ over ‘constructivism’ as a pedagogy - Possible tension then in moving to a constructivist model, as this reform was partly about.	20 x subject in the Junior Cycle 10 x NCCA short courses: -Coding -Civic, Social and Political Education (CSPE) -Physical Education (PE) -Digital Media Literacy (DML) -A Personal Project: Caring for Animals (Level 2) -Social, Personal and Health Education (SPHE) -Artistic Performance -CSI: Exploring Forensic Science (Level 2) -Chinese Language and Culture -Philosophy Schools have the right to create their own short courses and/or adapt those provided by the NCCA. Civic, Social and Political Education (CSPE) has essentially replaced ESS
N.Ireland (Nationwide)	Northern Ireland Curriculum Key stage 3 – Ages 11-14	Main site for NI Curriculum: Curriculum and learning Department of Education	Post 14yrs – there is an entitlement framework available at	Key stage 3 Curriculum – ages 11-14, years 8,9 and 10: Statutory Curriculum - Key stage 3 - ages 11-	Education Act 1989 – Now – 2007 Curriculum in place	Post primary quick guide to the curriculum (Official document) Post Primary quick guide	2021 - Secondary schools in Northern Ireland - Governance, Policy and Curriculum - McFlynn, McQueen and Murphy	-curriculum applies to all 12 years of compulsory schooling Citizenship Education status ???????? KS3?

	Key stage 4 – Ages 14-16	(education-ni.gov.uk)	Entitlement Framework Department of Education (education-ni.gov.uk) However not the same as a curriculum framework	14 - years 8,9 and 10 - Rationale and Detail.pdf Local and Global Citizenship- Guidance for Key stage 4 Literally Optional – Local and Global Citizenship - Key stage 4 - ages 14-16 - years 11 and 12 - Guidance doc.pdf		to the curriculum.pdf Curricular planning documents: Circular 2021/19 - Curriculum Planning for Post Primary Schools 2021/22 Department of Education (education-ni.gov.uk) Languages for the future final report: Languages for the Future - Northern Ireland languages strategy - Final report Department of Education (education-ni.gov.uk)	2016 - Everyone Has to Find Themselves in the Story Exploring Minority Group Representation in the Citizenship C – Hanna	Term for secondary loosely translates as ‘post primary’ The revised curriculum, approved in 2004, was the culmination of 5 years of research and consultation. A significant change to the curriculum has been the removal of many statutory requirements relating to subject content. 2004-2007 removal of many statutory requirements relating to subject content.
Wales (Nationwide)	Curriculum for Wales (CfW) Year 7 through to Year 10 by 2026 (adding each year 7 group to the new curriculum as they transit between foundation and CfW)	Called the ‘curriculum guidance document’ - curriculum-for-wales-guidance-120320.pdf (gov.wales) Hwb (gov.wales) 	Not available OR it is called the ‘curriculum guidance document’	Humanities Humanities: Introduction - Hwb (gov.wales) Containing broadly an: Introduction Statements of what matters Principles of progression	2022 Early Implementation programs operated as pilot from 2019 Planned full Implementation in 2026	Introduction to Curriculum for Wales guidance Summary of legislation Designing your Curriculum Supporting Learner Progression: Assessment The journey to Curriculum rollout	See year One PhD folders	Consultations in 2020 looked at Relationships and Sexuality Education guidance and Code Religion Values and Ethics Careers and Work-Related Experiences Enabling Pathways Revisions to the Cross Curricular Skills Frameworks A curriculum for non-maintained settings to adopt Draft Progression Code Draft Statements of What Matters Code

				Descriptions of learning Designing your curriculum		Implementation Plan 6 x AOLE Cross-curricular skills framework Routes for Learning Reading and Numeracy Assessments Education is Changing A guide for children, young people and families Siarter lath guidance doc Curriculum for Wales Blog A new Curriculum in Wales: An Easy Read		- My CDA - WISERD Work Hosts a National network for Curriculum Implementation
Scotland (Nationwide)	Currently ruled out on the basis of its 'similarities' with Wales and the CfW – particularly the involvement of Prof Graham Donaldson and his educational ideas of reform							
England (Nationwide)	See first year PhD files and articles and findings – Citizenship is a subject with GCSEs and A'S level exams. – Powerful knowledge and the issue of 'if it's not assessed, its not credible' – well the opposite is of course also true and applies here – Many articles address this							

Australia (Nationwide) & (State-Specific)	F-10 Curriculum = First 11 years of compulsory schooling	AC docs available at: Home The Australian Curriculum	Framework in the AC context refers to the:	Humanities and Social Sciences available at Humanities and Social Sciences The Australian Curriculum	AC implemented by Labour Gov' in 2007.	Numerous – All available from the central platform F-10 curriculum The Australian Curriculum	2008 – Teaching and Learning International Survey (TALIS) (OECD 2009) found that Australian teachers favour 'constructivism' over 'transmission' as a pedagogy – Whilst this coheres with both the VC and the AC, the Australian Government (2014) noted that 'more transmission' was needed to compliment the constructivist approach that defines these two curricula.	Australian states have a strong history of school-based curriculum development – which bodes well for widescale adoption.
	Senior Secondary Curriculum = Similar to A'levels – Same age range Experimental state wide specs - As in Queensland's introduction of 'The New Basics' Also Victoria's F10 Curriculum	ACARA - Curriculum VC docs available at Download curriculum - Victorian Curriculum (vcaa.vic.edu.au) The New Basics docs available at Home Queensland Curriculum and Assessment Authority (qcaa.qld.edu.au)	'Framework for Aboriginal Languages and Torres Strait Islander Languages' from 2022 And so, what we would understand as a curriculum framework can instead be found in (ACARA 2012 p,222) Frameworks for Victoria' Curriculum can be found here: The Progressive Curriculum Frameworks for The Victorian	Of which one of the five component parts is entitled, 'Civics and Citizenship' available at Civics and Citizenship The Australian Curriculum Which is studied in Years' 7, 8, 9 and 10 (and optional in the senior secondary curriculum) This page includes for all year 7-10, the course rationale, aims, structure and supporting docs. ASWELL AS: required general capabilities, cross-curricular priorities, further	In 2014/15 National-Liberal Gov' elected and Immediately commissioned a revision of the AC AC version 8.4 is currently in use but due for revision 2021' However the revision has been postponed due to Covid	Numerous – Comprehensive coverage at Civics and Citizenship The Australian Curriculum Key docs include: 'The shape of the Australian Curriculum' Shape of the Australian Curriculum v4.0 (acara.edu.au) 'Curriculum Development process' curriculum-development-process-v6-0-final-acara.pdf 'Australian Gov' 2014 Review of Curriculum – Final report' Review of the Australian Curriculum Final Report 2014 - Department of	2020 -Curriculum change in Australia and Ireland - Gleeson 2010 - Policy borrowing policy learning testing times in Australian schooling - Lingard 2014 - Two contrasting Australian curriculum responses to Globalisation - What students should learn or become - Lingard and McGregor The AC was developed without significant consultation with teachers and the profession – Lingard 2018, p. 62 = OPPOSITE TO CfW	"The 'New Basics' experiment that occurred in the State of Queensland (2000–2003) – Separate from the Australian Curriculum (AC)... The New Basics project abandoned traditional school subjects for futures oriented, 'real-world' learning... The Australian Curriculum demonstrates a strong return to 'the disciplines', partly as a local backlash against experiments like the New Basics and Outcomes Based Education (Lingard 2014) Despite this the Triadic structure of the AC does acknowledge the global trend towards 'developing the Individual' as capable of integration in a highly changeable globalised future. -AC and VC are competency based –

			Curriculum - Effective Curriculum Ideas (weebly.com)	info, level descriptions, content descriptions. Achievement standards and work samples Civics performance criteria Civics and Citizenship Sequence of achievement_7-10.pdf & Civics_Citizenship - Sequence of content.pdf		Education, Skills and Employment, Australian Government (dese.gov.au) Through Growth to Achievement: 2018 Report of the Review to Achieve Educational Excellence in Australian Schools 662684_tgta_accessible_final_0 (1).pdf	2016 - Who is steering the ship National curriculum reform and the reshaping of Australian federalism – Savage 2018 -The Australian Curriculum - A Critical interrogation of why, what and where to – Lingard 2018 - Critiquing Curriculum Policy Reform in Finland and Australia- A Non-affirmative, and Praxis-oriented Approach – Hardy and Uljuns ‘Curriculum reform’ research conducted by NCEE (See British Columbia) partnered with ACERA Australian Council for Educational Research (ACER) Ongoing Research - NCEE OECD increasingly influencing global curricula, inc Australia (Lingard 2013) Emergent emphasis on skills, and knowledge, learning and teaching: teacher/student agency and regulation (Gleeson et al 2020)	However there has been a return to the disciplinary approach to constructing curricula -ACARA hosts a digital glossary Website is Heavily interactive with a comprehensive set of digital resources and support resources Cit Ed ACARA said to be too far removed from the curriculum and the teaching community Control of the curriculum by state authorities impact the level of teacher and school agency
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							Australian debate regarding NC was dominated by power struggles between federal and state entities over the need for a nationwide curriculum. Phenomenon of 'curriculum globalisation/globalization' present in AUS Curriculum (Gleeson et al 2020)	
New Zealand (Nationwide)	The New Zealand Curriculum for English Medium Teaching and Learning in years 1-13 & The Te Marautanga o Aotearoa	Two main Curriculum documents used in conjunction are the 'New Zealand Curriculum' - available at NZ Curriculum years 1-13 [2007].pdf and the Te Marautanga o Aotearoa – available at <i>Te Marautanga o Aotearoa</i> https://www.education.govt.nz	N/A	'Social Sciences' 1 of 8 AOEs – What are the social sciences? / Social sciences / The New Zealand Curriculum / Kia ora - NZ Curriculum Online (tki.org.nz) – Contains objectives by level, summaries, structures etc	Curriculum enacted since 2007 Aotearoa New Zealand's histories to be taught from 2020 Rest of Curriculum to undergo reform this year 2022, as part of the EWP New Zealand Government currently reviewing its 'entire' education strategy – no explicit mentions of Curriculum or Citizenship' ?????? Information on the development of the draft curriculum	Search results – Education in New Zealand Resources on the curriculum change – Education in New Zealand Treaty of Waitangi - Treaty of Waitangi - 4 pages.pdf Assessment resources and lesson plans Level 3 Social studies / Social studies / Social sciences / Resources for Internally Assessed Achievement Standards / NCEA on TKI - NCEA  The New Zealand Curriculum (PDF, 9 MB)	Curriculum and Reform: NZ has downgraded 'Knowledge in their most recent curriculum reform. (Preistley and Sinnemma 2014) compares this with Scotland – And further comparisons can then be drawn with the CfW in Wales Citizenship Education: 2016 - Citizenship Education in New Zealand - Policy and Practice - Wood and Milligan 2019 - Not-a-subject-but-an-end-goal_education-for-citizenship-in-new-zealand - CA Mutch 2020 - Moments of possibility in politics policy and practice in New Zealand citizenship	Global trend of revitalising local languages and cultures prevalent here with Colonial and Indigenous populations attempting to address their difficult history. NZ rewrite of history curriculum (as opposed to ALL of the curriculum) this year 2021 – with English Maths and Science scheduled for next year In March 2021 the Cabinet agreed to the contents of the Education Work Programme (EWP) 2021 for this term of Government. The Education Work Programme 2021 has a strong focus on implementation and delivery, and on addressing

					content available at Aotearoa New Zealand's histories: More detail on the draft content creation and how we will support schools and kura.	 Revised Technology learning area (PDF, 297 KB)  Curriculum achievement objectives by level (PDF, 597 KB)	education - Mutch and Wood 2021 - Embedding Education for Sustainable Development (ESD) and SDGs values in curriculum: A comparative review on Qatar, Singapore and New Zealand – Zigur et al CA Mutch – key author on NZ Citizenship and Curriculum	systemic issues within the education system, such as falling levels of achievement in maths and science, poor and declining rates of attendance, and the relatively high levels of bullying within the schooling system. Interestingly no mention of citizenship – However clear attempts at historical redress with indigenous communities ?????
Ghana (Nationwide)	GES NCAA Curriculum	Main site: Just In: GES Academic Calendar 2022 January 2022 Out (avenuegh.com) Separate syllabus available at Download New GES Syllabus (NaCCA Curriculum) All Subjects (B1 to B6) - 2022 - Avenuegh.com Online Portal Age Ranges:	National Pre-tertiary Education Curriculum Framework Ghana Curriculum Framework 2018.pdf	Pre-Primary and Lower Primary = Ages 4-8 > GES-New-R.-M.-E-Syllabus-Lower-Primary-Basic-1-6-September-2019.pdf (avenuegh.com) GES-New-History-Syllabus-Lower-Primary-Basic-1-6-September-2019.pdf (avenuegh.com)	Free high school for all established in 2017 – in 2019 mor reform in the way of a new Curriculum. Some Curriculum docs are dated 2020	2018-2030 Strategic Education Plan: Ghana Education Strategic Plan 2018 - 2030.pdf Religious and Moral Education (Basic 7 - 10) [2020] : GES-New-JHS-Syllabus-RELIGIOUS-AND-MORAL-EDUCATION-CCP-CURRICULUM-FOR-B7-B10-ZERO-DRAFT.pdf	2020 - Factors that affect the development and planning of the Curriculum in Ghana - Dawmina et al MPHIL THESIS 2020 - Relevance of the Senior High School Curriculum in Ghana in Relation to Contextual Reality of the World of Work - Kwadwo et al 2020 - Teacher's perception of the new educational curriculum - Aboagabye and Yawson	Citizenship is sub-strand 1, of strand 4, of the GES Upper primary 'our world our people' No social studies subjects, units, modules etc Same for Citizenship Religiously oriented (Seemingly low status) Former British Colony, with earlier cultural influences from the Portuguese via trading – Gained Independence in 1957.

		Pre-Primary (KG) and Primary Lower - Ages 4-8 Primary Upper – Ages 8-12 JHS – Ages 12-15 SHS/TVET – Ages 15-18 Units that could carry Citizenship include: - Lower and Upper primary : -GES History -GES Our World Our People and - GES Religious and Moral Education		GES-New-Syllabus-OWOP- Lower-Primary-Basic-1-3-September-2019.pdf (avenuegh.com) Upper Primary > GES-New-French-Syllabus-Upper-Primary-Basic-4-6-September-2019.pdf (avenuegh.com) GES-New-Curriculum-OWOP-Upper-Primary-Basic-4-6-September-2019-Edition-.pdf (avenuegh.com) GES-New-R.-M.-E-Syllabus-Lower-Primary-Basic-1-6-September-2019.pdf (avenuegh.com) Social Studies teaching syllabus (Senior High School 1-3): social-studies-shs-1-3-2010.pdf Social Studies (Basic 7 – 10)			2021 - The Impact of Free Secondary Education in Ghana - Duflo et al Implementation and evaluative studies ongoing by the Kenyan Gov	Religious and Moral Education Common Core Programme Curriculum (Basic 7-10)– Prominent position in the Curriculum. Focus on maths for tech opportunities. Four R's to improve literacy and citizenship and work prep for graduation and life in an everchanging world.
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				[2020] GES-New-JHS-Syllabus-SOCIAL-STUDIES-CCP-CURRICULUM-B7-B10-DRAFT-ZERO.pdf NB For all other C's and Syllabi's see file 'C docs for Ghana'				
Kenya (Nationwide)	CBC Competency Based Curriculum 5 grades	Kenya Institute of Curriculum Development (kicd.ac.ke)	Curriculum Framework equivalent in Kenya in the 'Curriculum Design' and they are available for all 18 Learning Areas, across; pre-grade 4, Grade 4, Grade 5, Grade 6 and Grade 7.	Social Studies is 1 of 'Learning Areas' - SOCIAL-STUDIES-GRADE-6-CURRICULUM-DESIGN.pdf (kicd.ac.ke) Full list of Learning Areas in alphabetical order of presentation of website: -Agriculture -Arabic -Art and Crafts -Christian -Religious Education -English -French -German -Home Science -Hindu Religious Education	CBC introduced in 2017	Multiple links to various reports, papers, committees, sample work, curriculum frameworks, learner materials etc etc Curriculum Reform Policy : Kenya Institute of Curriculum Development (kicd.ac.ke)	2018 - The New Curriculum of Education in Kenya A Linguistic and Education Paradigm Shift – Kaviti	New Curriculum is competency-based and focuses more on skills acquisition as opposed to a purely knowledge-based acquisition system 2017 response to historical curriculum developments, ex-colonial influences etc New Curriculum announced alongside 'free secondary schooling' announcement Is this new 'C' drafted with children's rights in mind? The CBC was researched and developed by KICD (Kenya Institute of Curriculum development. BBC article Kenya's CBC education reform: How

				-Indigenous Languages -Islamic Religious Education -Kiswahili -Mandarin Chinese -Mathematics -Music -Physical Health Education -Social Studies -Science and Technology				scarecrows are terrifying parents - BBC News
Nigeria (Nationwide)		Curriculum Nigeria Education (nigeria-education.org)	2017 – Reform where the traditional academic subjects were supplemented by 34 vocational subjects	Citizenship Education: Curriculum Implications in Nigeria Secondary Schools. Nigeria Education (nigeria-education.org)			2013 - Comparative analysis of the intended and the achieved Senior Secondary school physics Curriculum in Nigeria - Oladeji 2015 - Recent Curriculum Reforms at the Basic Education Level in Nigeria Aimed at Catching Them Young to Create Change – Igbokwe 2021 - Comparative Studies of History and Civic Studies in Nigeria Education – Orighmisan 2021 - The new educational curriculum in Nigeria - Udofia	Nigeria has introduced a new senior secondary education model that emphasizes the skills as well as the academic development of learners. The skills component of the model is being pursued through the teaching and learning of 34 vocational (trade-based) subjects developed by the Nigerian Educational Research and Development Council (NERDC), Nigeria's agency for curriculum development.

USA '50 states -50 Curricula' - No National Curriculum – enshrined in law in 1965 Elementary and Secondary Education Act. Certain Laws need heading but otherwise the curriculum is only guided by non-statutory codes	'50 states 50 curricula' – No national curriculum as mandated by 1965 Elementary and Secondary Education Act	No central website or access point Curricula are devised locally at state/school district and major city level – see State Contacts and Information (ed.gov) - contains interactive map that links to each states versions of curriculum Based on the 'American Common Core State Standards' Home Common Core State Standards Initiative (corestandards.org) of which 41 states, the District of Columbia, four territories, and the Department of Defence Education Activity (DoDEA) have	An example of the curriculum frameworks used in Massachusetts Current Curriculum Frameworks - Massachusetts Department of Elementary and Secondary Education	By the nature of the country's curricula organisation, there is no 'one way' However citizenship or 'Civics' is generally covered with the 'social sciences' curricula	Various		See first year PhD research and files - Lots of US coverage 2003 - U.S. High School Curriculum Three Phases of Contemporary Research and Reform - Lee and Ready 2011 - Common Core Standards - The New U.S. Intended Curriculum - Porter et al	US Curriculum is a 'mile wide and an inch deep' quote
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		voluntarily adopted. The core standards cover: - English language arts and Literacy (ELA)						
Jamaica (Nationwide)	National Standards Curriculum (NSC) Education compulsory for 6-11 yr olds (Primary Equivalent) Secondary education covers five years (grades seven to eleven) with an additional two years (grades twelve and thirteen) for those who want to move on to higher education.	Not available, but broken down into components available at Curricula – Ministry of Education, Youth and Information (moey.gov.jm)		Lower2nd-social_studies.doc (moey.gov.jm) & GuideGrade7-9_SocialStudies.pdf	Revision of the curricula commenced in 2012. Piloted between 2014 and 2016 Phased Implementation commenced in 2016 Replaced the ROSE (Reform Of Secondary Education) Curriculum which operated through the 90s and 2000s NSC grades 7-9 published 2020			Not a single mention of ‘citizenship’ in Lower 2 ND and Grade 7-9 social studies syllabus Only 3 mentions of ‘Citizen’ There are now multiple pathways The Proficiency Pathway and Alternative Pathway to Secondary Education. The Proficiency Pathway is a targeted approach to identify students who need special intervention, and this continues at the primary level. The APSE encompasses Secondary Pathways I, II, and III – (SPI, SPII and SPIII). These are three pathways that are distinguished by the level of reflective coaching support and

	The years in secondary school are divided into two cycles: first-cycle (grades seven and eight) and second cycle (grades nine through eleven)							customized or individualized learning required to help students succeed. The students on Pathways II and III receive support from coaches who are special education trained teachers. Additionally, specialized teaching/learning approaches are employed, for example, Differentiated Instruction, Response to Intervention (RtI) and class size is smaller than the average class size. Aim = 25 pupils per teacher Secondary content 'coming soon' on website
India (Nationwide)	K to 12 Basic Education Kindergarten to year 12	2021 New Curriculum docs available at CBSE Academics Unit : Curriculum/Syllabus (cbseacademic.nic.in) – In separate docs	Latest framework currently still employed from 2005 – available at: 2005 National Curriculum Framework. pdf To be revised/replaced	2017 Module 1 of 'Understanding the CISCE Curriculum' 2017 - Module I - Understanding the CISCE Curriculum (2 of 2 Curriculum documents).pdf The Central board of Secondary Education' 2020-21 Curriculum	Current Curriculum in place since 2005 Latest 'citizenship module' issued in 2017 Currently in Review as of 2021 Based on: The NEP (National Education Policy 2020) available at	National Education Policy 2020 2021-22 Social Science syllabus.pdf National Education Policy 2020 – Background paper for Teacher's fest 2020 - National Education Policy - Background Paper for Teacher's fest.pdf	2018 - Conflict between covers - Confronting official curriculum in Indian textbooks – Syeed National Curriculum Review 2021 - Ongoing	More 'local flavour' and focus on heritage There are two key versions of the Indian curriculum: the CBSE (Central Board of Secondary Education) and the CISCE (Council for the Indian School Certificate Examinations) -entirely paperless reform

			Imminently (following 2020/21 review)	2020-21 - The Central Board of Secondary Education (1 OF 2 Main Curriculum documents).pdf 2021 – Social Science Syllabus 2021-22 Social Science syllabus.pdf	NEP_Final_English_0.pdf (education.gov.in)			-Claimed to be unique due to ‘bottom up’ development process – however??? CfW and others -core focus on ‘Citizenship’
Philippines (Nationwide)	K to 12 Basic Education Curriculum Kindergarten to Year 12	Multiple docs available via K to 12 Basic Education Curriculum Department of Education (deped.gov.ph)	Frame work available at (PDF) The K to 12 Curriculum The K to 12 Philippine Basic Education Curriculum Framework DEPARTM ENT OF EDUCATI ON Venus Cortes - Academia.e du ONLY upon joining google or facebook		Enhanced Basic Education Act of 2013 (EBEA), prompted reform of K to 12		2019 - On the many educational reforms in the Philippines - ?	- At present, the Philippines is the last country in Asia and one of only three countries in the world with a 10-year pre-university program
Canada (Nation-level specificities and requirements)	N/A						2021 - Curriculum reform in a culture of redress: how social and political pressures are shaping social studies curricula in Canada - James Miles	

							2013 - Related and conflated - A theoretical and discursive framing of multiculturalism and GCE in the Canadian context - Pashby	
Canada (Alberta)	K-12	K to 12 curriculum and programs of study Alberta.ca	Not Yet Located (NYL)	Can only find up to grade 6 [11-12 yr olds] [social studies] [review in 2021] [no overviews, other subject area docs and competency, numeracy and literacy progression docs = same as cross-curricular????]			2016 - Towards a critical global citizenship - A comparison of GC in Scotland and Alberta- Swanson and Pashby	
Canada (British Columbia)	BC Curriculum	Curriculum Building Student Success - B.C. Curriculum (gov.bc.ca)	NYL	Social Studies by subject – Various docs and links			National Centre on Education and the Economy (NCEE) USA – Many countries ‘C’ comparatively – inc British Columbia	
Canada (Manitoba)	K-12	Curriculum Manitoba Education (gov.mb.ca)	NYL	Curriculum Manitoba Education (gov.mb.ca) Curriculum Subjects links: -Anglais -Arts Education -Career Development				

				-Diversity Education -Education for Sustainable Development -English as an Additional Language -English Language Arts -English Language Arts – Immersion -François arts langagiers – immersion -French (English Program) -Indigenous Education -Information and Communication Technology -International and Heritage Languages -Mathematics -Physical Education/Health Education -Psychology -Science -Social Studies ----- --- (Social Studies Manitoba				
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				Education (gov.mb.ca) ----- -- -Sustainable Tourism -Technology Education				
Canada (New Brunswick)	K-12	Curriculum Development (Anglophone Sector) (gnb.ca)	NYL	Social Studies 1of3 Learning Areas				
Canada (New Foundland)	K-12	Curriculum - Education (gov.nl.ca)	NYL	(BILINGUAL) – Again loads of subject based Pdfs – Curriculum implementation 2020 – social studies broken into age and grade				
Canada (Northwest Territories)	K-12	NWT Education Programs Education, Culture and Employment (gov.nt.ca)	NYL	Active reform in place 2020-2021 – Again multiple docs and social studies available				
Canada (Nova Scotia)	K-12	Overview Canada: Curriculum Teach in Nova Scotia (teach-in- novascotia.ca)	NYL	Many curriculum docs – subject and age specific				
Canada (Nunavut)	K-12	Curriculum and Learning Resources	NYL	One 'C' doc encompassing all - multilingual				

		Government of Nunavut						
Canada (Ontario)	K-12	Curriculum (gov.on.ca)	NYL	Social Studies Social Studies (gov.on.ca)	2018 Revisions			
Canada (Prince Edward Island)	K-12	Programs of Study Government of Prince Edward Island	NYL	Social Studies - various links				
Canada (Quebec)	K-12	Québec Education Program Ministère de l'Éducation et Ministère de l'Enseignement supérieur (gouv.qc.ca)	NYL	(FRENCH but Docs in English) – Social studies divided into 6 docs – one is explicitly 'History and Citizenship Education'				
Canada (Saskatchewan)	K-12	Saskatchewan Curriculum Home (edonline.sk.ca)	NYL	Social studies – again part of multiple docs				
Canada (Yukon)		Learn about Yukon's school curriculum	NYL	Yukon schools follow the British Columbia (BC) curriculum, with the addition of the 'Yukon content' and the 'Yukon First Nations – ways of knowing and doing'				
	K-12							

Appendix Two: PESTLE Audit for Ghana

PESTLE Audit of Ghana (Bullet-Pointed)

Political Factors

- Stable parliamentary democracy since adoption of multi-party constitution in 1992
- Independence achieved in 1957 after prolonged European colonial rule
- History of military coups (1960s to 1980s), followed by sustained political stability
- Regularly ranks among top African nations for freedom of speech and press freedom
- Categorised as a “*flawed democracy*” due to corruption, electoral irregularities, and journalist harassment
- Estimated annual corruption losses of \$3 billion, despite being among Africa’s least corrupt states
- Politically stronger than many regional neighbours classified as “hybrid” or “authoritarian” regimes
- Active member of international and regional bodies:
 - ECOWAS
 - African Union (AU/AUC)
 - Organisation of African Unity (OAU)
 - African Continental Free Trade Area (AfCFTA)
- Recognised as a regional stabiliser and diplomatic leader in West Africa

Economic Factors

- One of Africa’s fastest-growing economies with a mixed economic structure
- Services sector contributes the largest share of GDP
- Agriculture employs 45% of the population
- Major global exporter of:
 - Cocoa (2nd largest globally)
 - Gold (2nd largest producer in Africa)
- Oil and gas enhance diversification but increase exposure to global price volatility
- Vulnerable to external shocks from commodity market fluctuations
- High public debt of 78% debt-to-GDP ratio
- Poverty increased slightly from 25% (2019) to 25.5% (2021)
- GDP per capita approximately \$5,700
- Overall GDP decline attributed partly to COVID-19 impacts

- Weak rankings in:
 - Global Innovation Index
 - Human Capital Index
 - Economic Freedom Index
- Performs comparatively well within Sub-Saharan Africa
- Major trading partners include:
 - China, United States, Nigeria
 - Belgium, Turkey, Canada, India
- Long-term goal to become a regional trade hub leveraging ECOWAS membership and stability

Social Factors

- Population exceeds 32 million with 2.15% growth rate
- Youthful population:
 - Over 50% under age 25
 - Only 3.6% aged 65+
- Potential demographic dividend alongside pressure on education, jobs, and infrastructure
- Ethnically diverse but socially cohesive society
- Major ethnic groups include:
 - Ashanti/Akan
 - Mole-Dagbon
 - Ewe
 - Ga-Dangme
- Occasional land-based inter-tribal disputes, but peaceful political transitions are the norm
- Highly religious society (95% religious adherence):
 - Predominantly Christian
 - Followed by Islam and traditional religions
 - Common hybrid religious practices
- Net migration slightly negative due to youth “brain drain”
- Significant inward migration from ECOWAS neighbours
- Persistent gender inequality:
 - Limited access to land, credit, and leadership for women
 - Women hold 13% of parliamentary seats

- High Gender Inequality Index score

Technological Factors

- Weak innovation and technological capacity
- Ranked 112th out of 132 countries in the Global Innovation Index
- Low performance in human capital and R&D indicators
- Structural barriers to research, innovation, and productivity
- Expanding investment in education and technological infrastructure
- School-building initiatives and expanded secondary education capacity
- Technological readiness improving gradually but below global averages

Legal Factors

- 1992 Constitution guarantees equality before the law and human rights protection
- Persistent structural gender inequalities, especially in land ownership and economic participation
- Key legislative efforts include:
 - Domestic violence laws
 - Disability protection legislation
 - Social protection strategies
- Immigration regulated by Ghana Immigration Service under “*Friendship with Vigilance*” principle
- Focus on migration control and national security
- Legal framework robust in theory but inconsistent in enforcement
- Gaps remain in realising rights for women and rural populations

Environmental Factors

- Environmental protection strongly linked to national identity
- Predominantly hot, dry, tropical climate with rich biodiversity
- Major environmental challenges include:
 - Deforestation
 - Land degradation
 - Unsustainable farming practices
 - Forest fires
 - Mining-related environmental damage
- Rapid decline in forest cover due to commercial exploitation and weak enforcement
- Participation in international environmental agreements
- National Adaptation Plan (NAP) 2018 targets climate resilience and sustainability

- High vulnerability to climate change and environmental degradation
- Malaria remains leading cause of death, highlighting environmental health linkages

Appendix Three: PESTLE Audit for Singapore

PESTLE Audit: Singapore

Political

- Singapore operates as a representative parliamentary democracy with mandatory voting for eligible citizens. While the President serves as the ceremonial head of state, the Prime Minister holds executive authority.
- The People's Action Party (PAP) has governed continuously since independence in 1965, producing long periods of political stability under leaders such as Lee Kuan Yew, Goh Chok Tong, and Lee Hsien Loong.
- The country is widely regarded for clean governance, consistently ranking among the least corrupt nations.
- Although stable, the political environment is often labelled a “flawed democracy” due to the dominant-party system and limited opposition competitiveness.
- National strategy emphasises “Total Defence,” an approach integrating military, economic, social, ideological, and civil preparedness.

Economic

- Singapore has achieved high long-term economic growth and is recognised globally for economic openness, competitiveness, and strong human capital.
- The economy includes robust sectors in transport, finance, business services, insurance, retail, electronics, chemicals, and logistics.
- Economic development historically relied on shifting from entrepôt trade towards industrialisation and later globalised, high-value sectors such as technology and financial services.
- Education has been central to economic strategy, with continual investment in skills, literacy, and workforce capability.
- Government expenditure remains supportive, including strong public investment in education.

- Social policy is tied to a mandatory savings system (CPF), supporting pensions, healthcare, and housing, which contributes to economic resilience.

Sociocultural

- Singapore has a population of roughly 5.45 million with extremely high population density and projected future growth, presenting pressures on housing, services, and infrastructure.
- The society is multi-ethnic and multi-religious, with Chinese, Malay, and Indian communities forming the major demographic groups, alongside a large non-resident population.
- The country identifies constitutionally as a secular democratic state, yet religious diversity is extensive, shaping community norms and social policy.
- Nation-building initiatives, such as the Singapore Pledge, flag ceremonies, and National Service, reinforce shared identity in a diverse society.
- Public housing policy has created high rates of home ownership and contributed to social cohesion.
- Bilingual education (English plus a Mother Tongue language) reinforces both national unity and global competitiveness.

Technological

- Singapore is internationally recognised for innovation and technological capability, reflected in strong global innovation rankings and competitive high-tech sectors.
- Industrial policy prioritises electronics, engineering, and advanced services, supported by a future-ready education system.
- Education reforms, including the shift from streaming to subject-based banding, aim to nurture flexible, skills-based learning aligned with technological change.
- High performance in international assessments reflects sustained investment in STEM-aligned competencies.

Legal

- Mandatory voting and well-defined electoral processes underpin civic participation.

- Multiple official languages, Malay, Chinese, Tamil, and English, are legally recognised, with Malay designated the national language.
- National Service is required for most male citizens, forming part of the wider Total Defence policy.
- Social legislation supports welfare, pensions, and familial obligations, including policies tied to compulsory savings and parental maintenance.
- Ethnic integration policies, such as housing quotas, are embedded in law to support social cohesion and prevent segregation.

Environmental

- Singapore is a compact island state of limited land area (main island plus around 64 smaller islands), situated just north of the equator.
- Extreme population density and land scarcity shape policy decisions in urban planning, sustainability, and resource management.
- Limited natural resources have required strategic long-term planning in land reclamation, water management, and infrastructure efficiency.

Appendix Four: PESTLE Audit for Wales

PESTLE Audit: Wales

Political Factors

- Devolved governance structure: Since 1999, Wales has transitioned from limited administrative autonomy to a mature devolved legislature (the Senedd), with powers expanding over five Assemblies. The shift from a *conferred powers* to a *reserved powers* model has significantly strengthened Welsh governmental authority.
- Political stability and continuity: Welsh Labour has dominated government since devolution, providing stable executive leadership and long-term direction. This continuity has enabled consistent policymaking, particularly around language revitalisation, education, and economic strategy.
- Tension and interdependence with Westminster, where Welsh governance operates within a multilevel system where many areas (e.g., defence) remain UK-reserved. Brexit intensified vertical power tensions, as Wales gained devolved powers while Westminster reabsorbed EU-derived competencies.
- High democratic standards: Wales scores as a “Full Democracy”, with strong electoral processes, civil liberties, and political culture.
- Local governance structure: Wales is subdivided into 22 principal areas (counties, county boroughs, and cities), enabling localised administration and contributing to policy complexity in service delivery.

Economic Factors

- Mixed economic performance since devolution. GDP of approximately £77.5bn (2021) and generally rising long-term, despite shocks from the 2009 recession and Covid-19.
- GDP growth remains volatile and has recently recovered to pre-Covid trends.
- Relative underperformance within the UK. GVA per head declined from 87.6% to 83.7% of the UK average (1999 to 2017), leaving Wales the lowest-ranked UK nation/region in productivity.

- Wales continues to face structural economic challenges linked to historic deindustrialisation.
- High poverty levels: About 700,000 people (roughly a quarter of the population) live in poverty, with Welsh children the poorest of any UK nation.
- Labour market. Employment improvements, especially for women (60.8% in 1999 > 69.6% in 2018).
- Persistent *in-work poverty*, with an estimated 270,000 working-age adults in relative poverty.
- 43,000 workers on zero-hours contracts.
- Foundational economy strategy. Responding to stagnant productivity, Wales is now investing in the “foundational economy”, core local services such as care, retail, food, and tourism, to improve resilience and community wellbeing.
- EU structural funding previously supported major job creation, though this has changed post-Brexit.
- Debt and macro-level indicators: Wales’ estimated debt-to-GDP ratio of 23.9% exceeds that of Scotland and the broader UK.

Social Factors

- Demographics. Population approx. 3.17 million, projected to decline by 2050 due to ageing and slowing growth.
- Ageing population: those aged 65+ expected to grow by 30% over 20 years.
- Population density concentrated in the South and North coastal areas.
- Migration. Wales is approximately 94 to 98% White Welsh/British, with diversity concentrated in Cardiff, Swansea, and Newport.
- Historically shaped by waves of migration (e.g., industrial-era inward migration; 18th–19th century emigration to Patagonia, US, Australia).
- Contemporary migration flows are comparatively low.
- Religion and culture. Rapid secularisation: Christian affiliation fell from 71.9% (2001) to 57.6% (2011), with “no religion” rising to 32.1% (2021).
- Welsh culture remains strongly associated with rugby, music, chapels, literature, and national identity.
- Social challenges. High levels of deprivation in several towns.

- Race and religion-based hate crime accounts for two-thirds of Welsh hate crime incidents.

Technological Factors

- Infrastructure shaped by historical industrialisation. Historically strong in rail and port infrastructure (e.g., Taff Vale Railway, Cardiff and Barry docks), laying the groundwork for industrial development.
- Current technological positioning. Wales does not appear separately in global innovation indices and is instead represented through UK-wide averages.
- Although the UK ranks highly for innovation, regional disparities mean Welsh technological capacity lags behind national averages.
- Digital public services and bilingual provision. Policies increasingly mandate bilingual digital and administrative services, influencing technological investment needs across government and public institutions.
- Education-driven innovation potential. Curriculum reforms (e.g., Curriculum for Wales 2022) focus on skills for a digital future, signalling attempts to cultivate human capital for a high-tech economy in the long-term.

Legal Factors

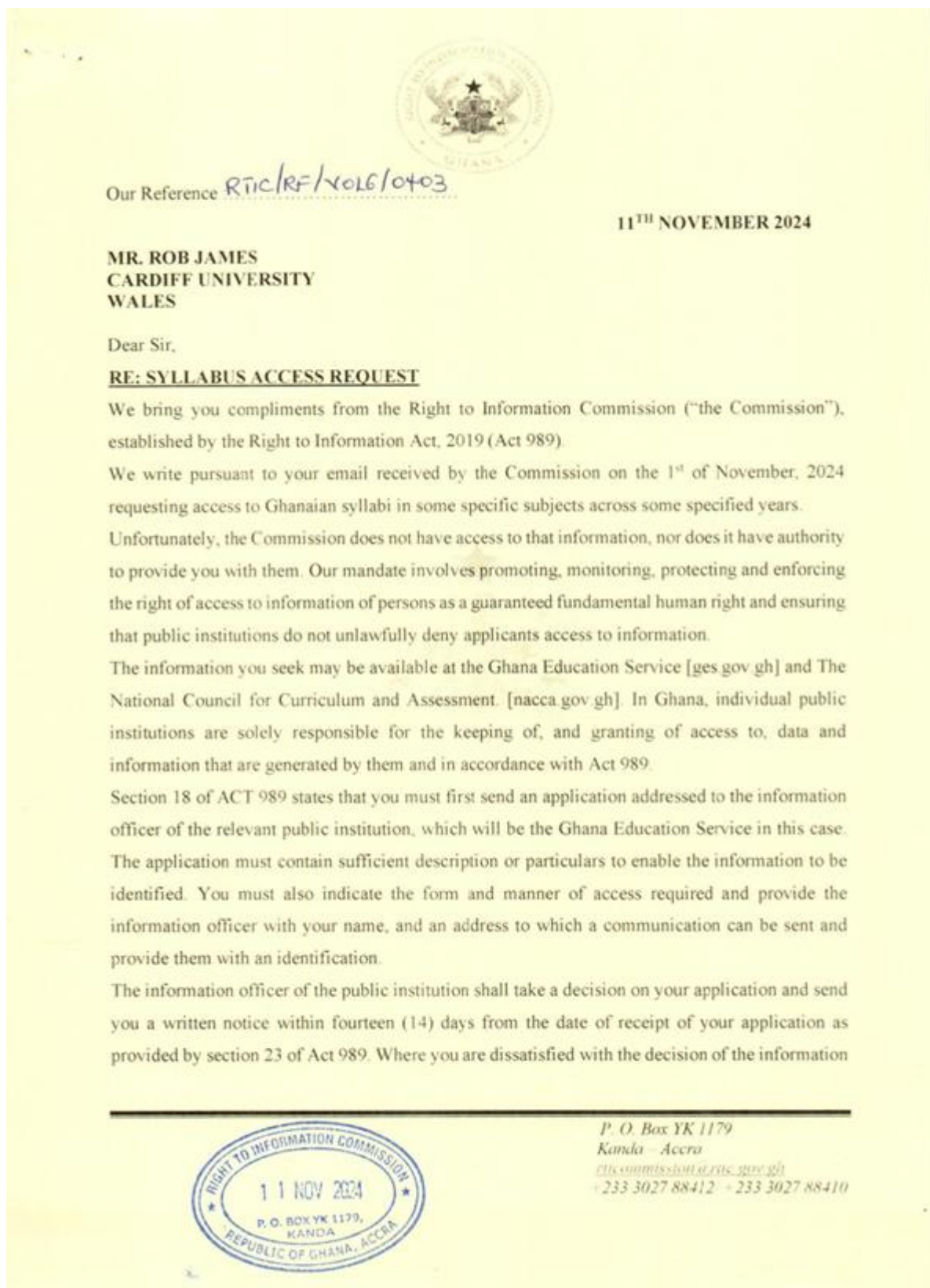
- Devolution of legal powers. Wales now passes its own primary legislation and has steadily expanded its legal autonomy.
- The transition from conferred to reserved powers significantly enhanced legislative clarity.
- Welsh language legislation. The *Welsh Language Act 2012* and associated Official Language Schemes (2013, 2017) create statutory duties for bilingual services.
- Gwynedd remains the only county where Welsh and English have equal workplace status, but policy aims toward nationwide bilingual provision.
- Equalities framework. Freedom of religion and other protected characteristics are formally enshrined under the UK Equality Act 2010, applicable in Wales.

- Education law and reform. Wales has full legislative control over education, enabling radical reforms such as the Curriculum for Wales 2022.
- Welsh is compulsory in schools until age 16, bilingual education and translanguaging are policy-supported approaches.

Environmental Factors

- Rich natural landscape and heritage, Wales is defined by mountainous terrain (Brecon Beacons, Cambrian Mountains), extensive coastline, and agricultural land.
- Historic environment protection. CADW emphasises the historic environment as “the physical manifestation of Wales’s cultural heritage”, central to national identity.
- Heritage assets. Wales claims the highest number of castles per square mile globally, alongside thousands of chapels, important both culturally and environmentally (in terms of built heritage management).
- Environmental governance. Many environmental and heritage functions are devolved, enabling Wales to set distinct sustainability, conservation, and tourism policies.
- Rural/urban divides, Environmental and geographic characteristics contribute to uneven population density, transport challenges, and regional disparities in economic development.

Appendix Five: Letter Response from Ghana's RTI Regarding Document Acquisition



officer or the information fails to respond to your application, you may apply to the Commission for review. the relevant provisions provide as follows:

Section 23

“(1) Where an application for access is received by a public institution, the information officer shall take a decision on the application and send a written notice to the applicant within fourteen days from the date of receipt of the application.

(5) Where an information officer fails to determine an application within fourteen days after the application is received by the public institution, the application is deemed to have been refused and the applicant has the right to seek redress under sections 31 to 39”

As earlier indicated, you have the right to apply to the head of the Public institution, if you are aggrieved by the decision of the information officer, for internal review of that decision under Section 31 of Act 989.

Section 31

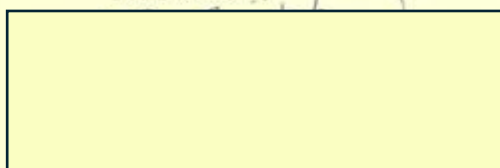
Except as otherwise provided in this Act, a person aggrieved by a decision of the information officer of a public institution may submit an application for internal review of that decision to the head of the public institution.

The head of the public institution shall within fifteen (15) days and as soon as practicable, make a decision and notify you of same in writing. Where the head of the public institution determines to grant you access to the information, he shall state the fees payable and the form in which access will be given.

If after exhausting these procedures, you are still dissatisfied with the decision from the public institution, you may then apply to the Commission for a review in accordance with section 65 of Act 989.

Be assured of our continuous cooperation.

Yours faithfully,



Appendix Six: Email Proforma's sent out to Various Institutions in Ghana (the country with the greatest challenge accessing documents)

Dear (Name Redacted)

My name is Robert James, I am a PhD researcher from Cardiff University (Wales), and as part of my investigation I am attempting to conduct a comparative analysis of Ghanaian, Singaporean, and Welsh citizenship education curricula - circa 1990-2025. In particular I am analysing Upper Primary Level and the Junior High School Level curriculums.

Unfortunately I have found sourcing some Ghanaian curriculum documents to be very difficult. Whilst I have managed to obtain electronic copies of *JHS Social Studies 2007*, *JHS Social Studies 2020*, *Primary 4-6 Citizenship Education 2007*, and *Basic 4-6 Our World Our People 2019*, I have been unable to locate any other Ghanaian syllabuses from between 1990 and 2025 that aim to educate future citizens, I.e. Citizenship Education and Social Studies. In particular, I am seeking to gain access to paper or electronic (preferably electronic), copies of any Social Studies Syllabi from 1990 onwards (excluding the two identified above).

I believe there may have been Social Studies Syllabi at JHS implemented in 1987, 2001 and another version in 2010, as well as Upper Primary versions of Citizenship Education, and Social Studies, also from the same period, but ultimately anything you can provide would be hugely appreciated, be they for example, ethics, civics, social studies, or indeed citizenship education (basically any syllabus implemented between 1990 and 2025 at the Upper Primary and JHS levels, that held specific responsibility for educating for citizenship)

I can imagine you are extremely busy and so I would appreciate anything at all that you could confirm, send, email, or signpost me to. I would of course acknowledge your assistance in my research, cover any costs, and provide you with a copy of my final thesis, should this be of any interest to you.

Thank you so much for your time and attention on this matter. I eagerly await your reply.

Kind regards

Robert James MSc, BSc, PGCE

PhD Researcher

Welsh Institute of Economic Research and Data

Cardiff University (South Wales)

sbarc|spark

Maindy Road

CF24 4HQ

Appendix Seven: Email Proforma's sent out to Various Institutions in Ghana (Example provided was sent to the NaCCA – Seven others were sent)

NaCCA Head Office
Ghana Literacy House
Accra
Ghana Post
GPS · GA-016-9970

05.12.24

FOA Information Officer,

Please accept the following request, pursuant to section 18 of ACT 989, of the Rights to Information Act 2019. Any information or actual documents you are able to provide will be greatly appreciated.

My name is Rob James, I am a PhD researcher from Cardiff University, Wales, working out of the Welsh Institute of Economic Research and Data (link to my profile: Rob James – Wales Institute of Social and Economic Research and Data) and I am attempting to conduct a comparative analysis of Ghanaian, Singaporean and Welsh Citizenship Education Curricula circa 1990 – 2023, but unfortunately, I have found sourcing some curriculum documents to be very difficult.

I have electronic copies of the following syllabi needed for my research:

1. CRDD (2007). Social Studies teaching syllabus for Junior High Schools. Accra: Ministry of Education
2. NCCA (2020) Junior High School Social Studies COMMON CORE PROGRAMME (CCP) CURRICULUM FOR B7/JHS1 - B9/JHS3

But I have been unable to source other important syllabi needed for my research, and was hoping you may be able to provide access to the syllabi/specifications that the following bibliography exerts refer:

1. CRDD (1987). Social Studies syllabus for Junior Secondary Schools, Accra: Ministry of Education.
2. Ghana Education Service, (2001). Junior secondary school social studies syllabus. Accra: Curriculum Research and Development Division.
3. Ghana Education Service, [GES]. (2010). syllabus for teaching social studies–Junior secondary school (JHS).Accra: Curriculum Research and Development Division
4. *Any other* Social Studies Syllabi for either primary pupils of Junior High School pupils, implemented between 1990 and 2024

I am also hoping to obtain copies of any 'citizenship' oriented syllabi from the same period, with the same age groups (Primary 4-6 and JHS or equivalent). I have already obtained:

1. *Primary 4-6 Citizenship Education (2007) syllabus*
2. *Basic 4-6 Our World Our People (2019) syllabus*

However, I would hugely appreciate access to any syllabi that Ghana has implemented with the goal of moulding future citizens between 1991-2024, be they titled; ethics, civics, social studies, humanities, or citizenship education.

Finally, I am happy to incur any financial cost in gaining access to these documents. I would of course acknowledge your assistance in my research, and provide you with a copy of my final thesis, should this be of any interest to you.

Thank you so much for your time and attention on this matter. I eagerly await your reply, and look forward to a fruitful and meaningful exchange.

Kind regards

Rob James BSc, P.G.C.E(M), MSc, PhD Researcher

END OF THESIS



School of
Social Sciences
Ysgol y Gwyddorau
Cymdeithasol

