Abstract

This article examines the extent to which citizens of migrant origin are included within discourses of national identity in civic education curricula in England, France and Ireland. We explore how much space is given to citizens of migrant origin in discourses of national identity in civic education curricula and how they fit with ‘central’ values normalized by a higher degree of recognition in schools. Although early immigration systems assumed that incorporation of migrants into the national polity would take place via socialization in education, the failure to include citizens of migrant origin in the contemporary ‘imagined community’ articulated in civic education discourses risks marginalizing some citizens which gives rise to a sovereignty gap. The disparity between legal and cultural belonging of some individuals in Western Europe presents a major challenge for education systems which are tasked with making national identity discourse resonate with a globalized citizenry. The study found that despite commonalities around the promotion of human rights and democracy, civic education curricula diverge with regard to representation of religion. Moreover, nationalistic aspects of the French model contrast with a multicultural, and recently global, approach to citizenship education in England and the promotion of European citizenship in Ireland.

Key words: citizenship, national identity, migration, education, sovereignty gap
Introduction

This article aims to assess whether variation exists between the degree to which citizens of migrant origin\(^1\) are incorporated into the discourses of national identity in civic education curricula in England\(^2\), France and Ireland. In contemporary society, national identity offers stability and territorial attachment that reassures individuals who are perturbed by the dislocation, isolation and insecurity of globalized life (Guibernau 2007). National identity can be understood as a cultural concept that creates bonds between individuals on the basis of values that are perceived to be communal (Faas 2010). The ferocity of globalization and the ‘risk’ society has reified identity, whether national or post-national (Soysal 1994; Zurn and Leibfried 2005), as a crucial part of the individual’s response to the uncertainty of globalized society (Beck 2000; Holton 2008). The nation-state has a crucial role in the articulation of identities that allow individuals to participate in the globalized world (Castells and Hinamen 2002) as it offers an unparalleled legitimate and internationally-recognized identity. A credible national identity seems to provide advantages because mutually recognizable identities minimize transaction costs given that they carry ‘knowledge’ values about norms and values of identity holders. As the platform for global participation, internationally recognized national identities along with legal citizenship underpin individual sovereignty in the contemporary globalized world.

However, migration is calling into question the neat system of singular national identities that organizes and simplifies the massive global society (Benhabib 2004). Migration movements are testing the adaptability of national identities\(^3\). The right to citizenship is becoming increasingly contentious and questions are being raised about who has the right to participate and avail of established national identities (Koopmans et al. 2005) and whether multiple national identities can be held simultaneously. Although the legal criteria for obtaining a passport allows for a variety of diverse citizens, access to national identity has not
necessarily evolved with the diversification of citizens and subsequently ‘the ethnos no longer overlaps the demos’ (Benhabib 2004, 207).

Habermas (1998, 115-16) has argued that ‘there is a conceptual gap in the legal construction of the constitutional state, a gap that is tempting to fill with a naturalistic conception of the people’. Early nation-states filled this gap with a single national identity. However, a gap remains for those who are citizens by law but excluded from national identity. Thus, some individuals can be citizens on paper but outsiders in reality. The incongruence between citizenship and national identity is termed the ‘sovereignty gap’ (Ghani and Lockhart 2008) to denote disjunction between the legal entitlements of citizens and their reduced capacity to execute them in practice. Rigid national identities exacerbate the sovereignty gap experienced by citizens of migrant origin. Citizens of migrant origin who do not have a stake in the ‘imagined community’ (Anderson 2006) face the frustration of a limited role in global society because they are marginalized and/or excluded from national identity and cannot participate in global society with the same ease or to the same extent as others. The disparity between citizenship and national identity risks disenfranchising citizens of migrant origin because they cannot realize their individual sovereignty to which they are entitled. Indeed, the London bombings demonstrate how citizens experiencing a sovereignty gap found identity recognition and emotional attachment from an alternative source (Guibernau 2007). One of the most striking elements of the sovereignty gap in contemporary Europe is that it is not immigrants who manifest their identity frustration violently, but their children and grandchildren (Fanning 2007).

In November 2004, due to the widespread disaffection of Islamic communities in Europe, the Dutch EU presidency established a set of ‘Common Basic Principles’ of Integration. The fifth principle involved education and stated that ‘efforts in education are critical to preparing immigrants and particularly their descendants to be more successful and
more active participants in society’ (Council of Justice and Home Affairs Ministers 2004). The emphasis on education as a socialization tool is not new; national education systems have always been used to promote citizenship and national identity based on tautological and linear assumptions (Beck 2000), nevertheless, the challenge of reconciling the identity needs of a diverse citizenry in the classroom remains the most pressing issue for Western education systems (Guibernau 2007). Although the EU considers education to be a key tool for inclusion, there is divergence among curricula.

In the UK, citizenship education has been introduced on recommendation of the Crick Report in schools in September 2002. Recent alterations to the citizenship education curriculum, finalized in 2008, include an additional dimension under the auspices of ‘Identity and Diversity: Living together in the UK’ (Department for Education and Skills 2007) and a move towards more flexible global conceptions of citizenship (see Davies et al. 2008). Although citizenship education in England is still in embryonic form, Guibernau (2007) notes that Britain’s post-colonial guilt and the relatively early racial diversification of citizens due to the 1948 ‘Windrush’ generation sparked the multicultural approach to citizenship that aims to foster social cohesion and create a plural culture through commitment to basic values of liberal society (Faas 2010).

In contrast to the British approach, discussion on citizenship in France has been at the forefront of political debate for years. Brubaker (1992) has noted the prevalence of the theme of ‘desacralization’ of citizenship; the idea that French citizenship is merely an instrumental tool for accessing rights. In the 1980s, the agitations of extreme right-wing groups such as the Front National resulted in the Pasqua-Méhaignerie law in 1993 which made access to French nationality more difficult for individuals of migrant origin born in France. In 2005, the government introduced a controversial law (later repealed) stating that the positive aspects of colonialism in North Africa must be recognized in textbooks (Fanning 2007). These recent
polemics demonstrate the difficulties of incorporating individuals of migrant origin in the assimilationist French education discourse (Soysal 1994).

Ireland differs from the other two cases as it promotes intercultural civic education that aims to address all children by emphasizing cultural identity. However, inclusiveness is limited by ‘White, heterosexual, Irish, settled, Catholic’ (WHISC) mentality that tends to dominates public discourse (Tracy 2000). For example, in June 2004, a referendum on citizenship removed the jus soli grounds for citizenship from Irish-born children whose parents were neither Irish nor EU citizens (Fanning 2007). Euro-centrism has also been noticed in civic education in Ireland (Keating 2009) where minimal coverage is given to ‘third-country’ issues. Each context must negotiate its own history and society in order to develop an effective model of immigrant incorporation (Hantrais 1999). To avoid exacerbating the sovereignty gap, governments must supplement the diversification of the legal citizenry with an equivalent broadening of civic education curricula.

The three countries in this study rely on different models on how to address diversity in education. The idea of interculturalism, as distinct from multiculturalism, has hitherto more commonly been found in Dutch and German accounts of integration, particularly in the field of education (Gundara 2000). Proponents of interculturalism emphasize communication, interaction and dialogue while those who favour multiculturalism argue that reciprocity, dialogue and civic integration are also central to most, if not all, contemporary accounts of multiculturalism (Faas 2010). According to the United Nations Educational, Scientific and Cultural Organization (UNESCO 2006), multiculturalism describes the culturally diverse nature of societies. It not only refers to elements of ethnic or national culture, but also includes linguistic, religious and socio-economic diversity. In contrast, interculturalism refers to evolving interactions between cultural groups. Multicultural education uses learning about other cultures in order to produce acceptance, or at least tolerance, of these cultures whereas
intercultural education aims to go beyond passive coexistence, to achieve a developing and sustainable way of living together in culturally diverse societies through the creation of respect for and dialogue between the different cultural groups. According to Banks (1997), multiculturalism is a concept, an educational reform movement, and a process. For Banks, the intention of multicultural education is to create an environment offering equal education opportunities to students from different racial, ethnic and socio-economic backgrounds, thus preserving and promoting diversity while supporting students in becoming critical thinkers and responsible democratic citizens. To carry out these goals through multicultural education, Banks (2004) identified five crucial dimensions: content integration, knowledge construction, prejudice reduction, equity pedagogy, and an empowering school culture.

Although it can be argued that interculturalism is merely an updated version of multiculturalism, a key difference lies in the openness of space for communication. The emphasis of interculturalism on interaction and communication allows for unhindered participation of multiple identities, whereas communication space under multiculturalism can be aligned to the strength of present identities. In contrast, assimilationist curricula tend to restrict communication space to a single identity only. By assessing the space outlined in civic education curricula for the iteration of civic values, we can analyze to what extent citizens of migrant origin are incorporated into discourses of national identity.

**Theorizing National Identity and Citizenship**

National identity and citizenship have often been conflated because they both indicate a sense of ‘belonging’. Guibernau (2007) nuances between the two; national identity is an emotional attachment with a psychological element whereas citizenship is legal and political belonging. Traditional dialectics of rights and identities assume that the individual, as the subject of rights, has a fixed identity which determines the entitlement of rights (Benhabib 2004).
Congruence between the demos, ethnos and the territory was assumed and membership based on identity grounds was common practice (Delanty 2000; Faist 2007). However, globalization and migration have led to a rapid multiplication of identities (Caglar 1997). The incongruence of identities and rights has shaken up traditional notions of citizenship and national identities and provoked a re-evaluation of citizenship models. Debates range from the ‘decline of citizenship’ school (Todd 1994; Walzer 1994) to the elaboration of a post-national model of citizenship (Soysal 1994; Benhabib 2004).

The ‘decline of citizenship’ school emerged under concern for the integrity of the civic institutions of citizenship and national identity (Walzer 1994). The ‘decline of citizenship’ school claims that cosmopolitan ideas of world citizenship are not sufficiently sensitive to the special connections that individuals have to their land and history. ‘Decline of citizenship’ theorists fear the unravelling and ‘deracinated’ state of individuals in culturally diverse societies (Benhabib 2004). For example, Brubaker (1992) notes criticism of French citizens of migrant origin for viewing citizenship as a convenience rather than a privilege. A lack of emotional attachment to the nation allegedly demonstrates a ‘decline’ in the value of citizenship. Kymlicka (1995) notes that modern society requires a ‘societal culture’ common to all members, which requires an assimilationist model of civic education (Osler and Starkey 2001). If some members are not part of ‘societal culture’, then ensuing sovereignty gaps may undermine the functioning of society.

Alternatively, Guibernau (2007) notes that although citizenship models are changing, they remain potent in the era of unprecedented globalization. This argument criticizes the ‘decline of citizenship’ school for failing to consider the importance of constructing relevant citizenship through education (Devine et al. 2008). Guibernau emphasizes that psychological function of national identity cannot be underestimated as a means to offset negative aspects of modernity such as isolation and uncertainty. Taylor (1994) underlines the element of
recognition in identity and how this contributes to self-esteem. His work also deals with how identity is partly shaped by recognition or an absence of recognition, adding that misrecognition can be detrimental.

Models of citizenship within the nation-state framework tend to be grounded on a single cultural tradition, which facilitates the articulation and recognition of certain identities over others (Parekh 1997). National identity is a particular authorized version of events (Guibernau 2007) which excludes alternative experiences. The emotional bond between citizens that stems from sharing national identity does not resonate as strongly with those citizens whose personal experiences are not included in national identity (Eriksen 2001). When new citizens are denied a stake in identity discourse in the new culture, a sovereignty gap emerges because they cannot exercise their legal right to nationality (Article 1 of the Universal Declaration of Human Rights) and the loss of self-esteem becomes a potential risk as they have no sense of belonging (Ghani and Lockhart 2008). The consequences of the sovereignty gap can be severe as in the case of the London bombings (Guibernau 2007) because an identity vacuum emerges and citizens lose trust in institutions that do not grant identity recognition.

Other scholars have focused more on how migration flows and universalization of human rights discourse has resulted in the emergence of a post-national model of citizenship (e.g. Soysal 1994; Benhabib 2004). Post-national theorists see a dialectic of rights and identities which renders citizenship criteria a negotiable and fluid process. Shapiro’s principle of ‘affected interests’ states that individuals whose interests are at stake have a strong claim to inclusion in the demos (Benhabib 2004). Therefore, a legal citizen of a nation-state has a right to participate in the elaboration of that country’s national identity and thus should be included in the process of self-definition. Including the expanded demos in the elaboration of national identity also offers nation-states the opportunity to enhance their legitimacy by remaining
relevant to their citizens (Ghani and Lockhart 2008). In order to manage the coexistence of individuals from different cultures in the same public space, post-national theorists advocate a space for the reinterpretation of identities (Benhabib 2004). In France, the ‘Mémoire Fertile’ movement aimed to negotiate a new belonging in the nation-state by reclaiming and legitimizing the history of immigrants as part of French history (Soysal 1994). Reconfiguration of citizenship models allow multiplicity of membership and enable more identities to be accommodated.

Faced with an eclectic mix of citizens, with varying experiences, democratic iteration would allow for the creation of a new fluid citizenship model. In classroom practice, however, the legacy of the illusory notion of a homogenous ethnos acts as a barrier to entry to the democratic iteration process (Bryan 2010) and citizens of migrant origin who have different cultural affinities are excluded or marginalized from the discourse (Parekh 1997). Without adequate interaction between different cultural groups in society, perspectives on identity overlook internal heterogeneity within minority groups (Caglar 1997; Faist 2007).

**Research Methodology**

In order to capture the similarities and differences between these three countries that have contrasting approaches to integration – France is described as assimilationist (Soysal 1994), the UK as multicultural and Ireland uses interculturalism (Department of Education and Science 2006) – multiple case study design was used for this research. Education curricula served as units of analysis to allow examination of the varied extent to which citizens of migrant origin are incorporated into civic education. Although case study design has been criticized for lacking rigour that does not inform generalizations (Yin 2009), potential weaknesses can be offset *a priori* by ensuring equivalence is maintained between units of
analysis (Pepin 2006) in order to maintain the validity of the comparison (Engel and Hinderliter Ortloff 2009).

For this research, age equivalency is an issue because school systems are not aligned. The Irish syllabus applies to students aged 12-15, finishing a year earlier than the English and French systems. The English system commences one year earlier, at age 11. Nevertheless, the age groups chosen are the functional equivalent for each system (Hantrais 1999) because in all three countries they represent the last stage of compulsory education. Another equivalency concern is the range of titles of each curriculum; from ‘citizenship’ (England), to ‘civic, social and political education’ (Ireland), to ‘history, geography and civic education’ (France). However, Engel and Hinderliter Ortloff (2009) note that international study of civic education has established that civic education (in democratic countries) draws on the same material.

Following Engel and Hinderliter Ortloff (2009) who argue that civic education curricula can be conceived as the state’s expression of the ‘ideal citizen’ because the government produces and maintains the meaning of citizenship through civic education, these documents were chosen for sampling. For the purpose of this research, the documents were treated as primary sources because civic education curricula are compiled periodically by appropriate government-sponsored bodies and are thus the most contemporary document available for analysis.

There are multiple limitations to this study, from the possibility of conscience omissions (Mangen 1999) to the variation in practice according to the classroom context which are impenetrable from studying one text alone. Particularly in a cross-national study, different education cultures that form the backdrop for each curriculum influence how subjects are taught (Pepin 2006). Similarly, it is possible that the content of civic education curricula does not resonate with students and therefore is not transferred beyond the
classroom environment. These aspects of civic education cannot be investigated through the analysis of documentary sources and will limit conclusions.

Critical discourse analysis (CDA) targets the socially constructed nature of national identity discourse and will be used to explore whether some discourses of identity are privileged over others in civic education. CDA is a form of socio-political discourse analysis (Van Dijk 2001) which assess how dominance in discourse is produced and maintained. Maclure (2003) notes that CDA links domination in discourse to social inequalities in society by denaturalizing discursive power and exposing how discourse naturalizes power relations which disadvantage particular groups (Foucault 1980). CDA particularly emphasizes access to discourse as a source of social power which suggests that a sovereignty gap emerges for individuals who are excluded from discourse. Maclure’s work (2003) on binary oppositions in Western education demonstrates the potential for exclusion in classrooms where multiple identities are present.

CDA enables us to identify how nation-states use civic education discourse to establish national identity as a social reality and validate the identities of citizens. By looking at the ‘air-time’ given to certain identities, this article investigates how experiences of citizens of migrant origin fit with dominant identities. Particular attention is paid to whether reconciliation of multiple identities takes place via the social institution of civic education. Koopmans et al. (2005) have studied the impact of terminology on the self-definition of minority groups and the opportunity structures that exist for them to access identity articulation and challenge fixed notions (Holton 2008) of identity. Although the national is now being recast as ‘European’ (Schissler and Soysal 2005), there has been little investigation into whether this repackaging creates new exclusions (Delanty 2000). Habermas (1998) called for a legal identity to fill the European void, yet legal norms and values such as human rights and democracy can be culturalized (Sen 2006). If such values are branded ‘European’ in civic
education, does this disenfranchise citizens of non-European origin form this identity? Two themes of human rights and democracy (Steiner-Khamsi et al. 2002) and religion (Jackson et al. 2007, Knauth et al. 2008) were chosen for analysis because they illustrate two areas of citizenship education that offer opportunity for inclusion but can equally serve as mechanisms of exclusion. These two themes also allow variation between the three case studies to be demonstrated.

**Building citizens or cementing the sovereignty gap?**

The promotion of ‘human rights’ and ‘democracy’ is evident in all three civic education curricula which prioritize these values by presenting them as unquestionable norms. They are linked by using normative concepts such as justice, freedom and responsibility. The French curriculum states that ‘democracy recognizes and develops freedoms’ (Centre National de Documentation Pédagogique 2009, 56). In the Irish curriculum, the two concepts form part of the expected educational outcome, ‘a personal commitment (...) to the values of human rights, social responsibilities and democracy’ (Department of Education 1996, 14). The English curriculum explicitly couples human rights and democracy as a ‘shared responsibility we all (our emphasis) have to support and promote democratic values’ (Qualifications and Curriculum Authority 2009, 43).

The normalization of the values of democracy and human rights is facilitated through use of binary oppositions (Maclure 2003) which contrast state-sponsored values (Guibernau 2007) with negatively portrayed attributes. The Irish curriculum equates democracy with participation whereas non-participation is associated with ‘lack of responsibility on the part of the individual’ (Department of Education 1996, 10). In the same vein, the curriculum states that ‘denial of human rights results in the domination and oppression of people’ which dichotomizes the concept of human rights. The Irish curriculum demonstrates bias in favour
of human rights as children are expected to develop their ‘critical and moral faculties in agreement with a system of values based on human rights’ (Department of Education 1996, 7). This demonstrates government monopoly over the ‘suitability’ of national identity values which ensures that approved norms such as human rights and democracy dominate discourse.

Similarly, the English curriculum validates democracy and human rights through juxtaposition with ‘other’ values. The study of democracy in England is via comparison with ‘other forms of government, both democratic and non-democratic beyond the UK’ (Qualifications and Curriculum Authority 2009, 46). Binary oppositions are further used to construct the ‘imagined other’ when freedom of speech is described ‘in the context of threats from extremism and terrorism’ (Qualifications and Curriculum Authority 2009, 29). Given that human rights are also qualified as a European and international norm through reference to the United Nations (Qualifications and Curriculum Authority 2009) the ‘non-democratic’ or ‘extremist/terrorist’ is imagined as non-European and against international norms (Keating et al. 2009). The use of emotional language to imagine the threatening ‘other’ reinforces support for ‘normal’ values whose superiority is attested by an apparent parity with global norms.

The French curriculum also uses binary oppositions to evoke emotional attachment for the norms of democracy and human rights through discussion of security (Centre National de Documentation Pédagogique 2009, 57). ‘Security’ is described as a human right and the curriculum states that ‘in a democracy, the law ensures the security of people and goods’, a claim which is validated and normalized through reference to the European Convention on Human Rights. Democracy and human rights are also labelled as ‘French’ through use of intertextual references to historical documents such as the ‘Declaration of the Rights of Man and the Citizen’, which was a foundation of the French nation.

The similarities between the three documents regarding values of democracy and human rights reflect Soysal’s (1994) observation of the universalization of human rights
discourses. The normalization of these values through binary oppositions shows that governments continue to claim to adhere to these ‘universal’ values through civic education curricula in order to demonstrate the superiority of the values that constitute their national identity. In spite of potential exclusions, civic education curricula remain Eurocentric and ignore the contribution of Confucian philosophy and Buddhist (Sen 2006) scholarship to the articulation of the concepts which are understood today as human rights (Meckled-García 2005) and democracy. The omission of discussion about ‘universal’ concepts of human rights and democracy minimizes the extent to which citizens of non-European migrant origin are included, particularly if they are associated with the seemingly incompatible ‘other’. Democratic iterations are key to collective identity formation (Benhabib 2004) and an absence of debate marginalizes some participants because values remain static (Holton 2008) which diminishes the contemporary relevance of national identity. In spite of well-intentioned attempts to unite all citizens by alluding to universal values (Koopmans et al. 2005), the lack of recognition of other approaches to human rights and absence of provision for discussion about democracy reduces limits the inclusiveness of national identity discourse in civic education.

Turning now to the representation of religion, we can see that the three curricula diverge considerably. In France, laïcité is introduced early on as a fundamental principle of neutral public establishments (Raveaud 2008) through reference to the 2004 law that outlawed the wearing of ostentatious religious signs in schools (Centre National de Documentation Pédagogique 2009, 23-24). Later on, laïcité is situated alongside ‘freedom of thought’ and ‘freedom of expression’, as a human right (Centre National de Documentation Pédagogique 2009, 55). In the final year of school, laïcité promoted as a national identity value through reference to the 1905 law on the Separation of the Church and the State (Centre National de Documentation Pédagogique 2009, 76). The insistence on laïcité as a core value of French
Republican national identity is problematic because it is a contentious concept (Bowen 2007). Although laïcité is included as a discussion topic under the rubric of dealing with conflicting rights in society (Centre National de Documentation Pédagogique 2009, 56), the room for dynamic discussion of laïcité is limited given that the traditionalist understanding of the value is normalized in the first year of secondary education. Dominant discourse favours ‘traditional’ laïcité given the use of intertextual legal references such as the 2004 law⁷, which was widely criticized for targeting Muslim school girls (Benhabib 2004). The monopolization of French national identity by traditionalists results in the potential misrecognition (Taylor 1994) of proponents of ‘open laïcité’ (Baubérot 1990) as un-French. The curriculum does not provide adequate space for democratic iteration, despite the potential reinterpretation of laïcité, which implies tension between church and state, to fit the contemporary reality of twenty-first century France that is home to Europe’s largest Muslim population.

In contrast, the Irish curriculum focuses on transcendental values that unite all communities in spite of sectarian divisions. The Irish curriculum facilitates dialogue between communities by articulating values such as ‘interdependence’ (Department of Education 1996, 11). The delicate treatment of religion in the Irish curriculum reflects historical tensions between Protestant and Catholic communities. Minor reference is made to the Christian character of religion in Ireland when ‘schools are encouraged to augment (the) value-base to reflect the particular educational programme, ethos and denomination (our emphasis) of the school’ (Department of Education 1996, 15). The term ‘denomination’ has Christian connotations and reflects the nature of dominant discourse in Ireland (Tracy 2000). Christian overtones are evident in Section 2.2.2 where the concept of environmental responsibility is labelled ‘stewardship’⁸. Prioritizing the Christian approach to environmental responsibility potentially marginalizes non-Christian students, putting them at a disadvantage in terms of access to discourse as they would not be as familiar with the concept articulated in this way.
(Foucault 1980). Nevertheless, space for democratic iteration remains a substantial part of the Irish curriculum, involving an ‘action project’ and communication with the community beyond the school. This component would allow the concept of ‘stewardship’ to be reinterpreted in a plebiscitary nature to reflect the reality of the community.

Lastly, the English curriculum is unique as it demonstrates almost no influence of Christian culture, but rather emphasizes considering ‘different understandings of what it means to be a citizen in the UK’ (Qualifications and Curriculum Authority 2009). Discussion space is organized by emphasizing the importance of ‘distancing techniques’ and participation through ‘maximum inclusion’. Given that a plurality of perceptions of values is affirmed in the curriculum and all pupils regardless of legal status must enter into discussion about citizenship qualities, the provisions for democratic iteration of national identity are comprehensive. Distancing techniques aim to de-controversialize topics and prevent discussion from becoming emotional, however this mechanism could have an adverse effect on the extent to which discourse resonates with pupils. If items under discussion appear abstract and unrelated, the effectiveness of democratic iterations may be weakened. ‘Maximum inclusion’ can also be criticized when it appears alongside a suggestion to study the Commonwealth and its link to the British Empire as a diversity topic (Qualifications and Curriculum Authority 2009, 33). Framing diversity under the aegis of the British Empire and the Commonwealth, in a classroom where citizens of colonial or Commonwealth origin may be present limits discussion of identity which is based on a single version of history (Osler and Starkey 2001). The disparity between the space for proud emotional reaction to this topic and alternative post-colonial manifestation of resentment which is not endorsed by the curriculum demonstrates a fundamental weakness in the structure of democratic iterations and its capacity to resonate with the diversity of the classroom.
**National identity (re)constructions**

The gradual erosion of the nationalist character of citizenship is considered more conducive to global community cohesion as it removes imagined barriers (Philippou et al. 2009) that exclude and marginalize some communities.

The Irish curriculum constructs a post-national identity based on ‘universal’ values such as human rights. The promotion of democracy reflects the explicitly European character of this curriculum (Keating 2009). The move to this model of citizenship in Ireland was partially pre-empted by the situation in Northern Ireland where community conflict necessitated a non-exclusive model of citizenship (Gallagher 2007). The intercultural approach to education in Ireland was cemented in 1998 (Smyth et al. 2009), the same year as the establishment of the Good Friday Agreement (McEvoy 2007).

Nevertheless, post-national models of citizenship are not immune to exclusionary elements. The assumption that ‘universal’ values exist overlooks the cultural bias embedded in values such as human rights and democracy. Post-national citizenship may result in new exclusions especially where support for identity is generated by focusing on the ‘other’ (Philippou et al. 2009). The Irish curriculum demonstrates clear sponsorship of certain ‘normal’ values framed with reference to Europe (Keating 2009), risking the exclusion of citizens of migrant origin from outside the EEA area (Smyth et al. 2009). Post-national citizenship does not necessarily increase inclusion because it is not a form of ‘a-national’ citizenship. It involves reduced space for the national and its associated exclusions rather than complete removal. Although a model of ‘a-national’ citizenship could perhaps achieve maximum inclusion, it is politically unappealing given that national identity remains the global brand of nation-states (Ghani and Lockhart 2008). In terms of the sovereignty gap, the Irish case demonstrates that a move to post-national citizenship boosts the flexibility of
identity iteration. By emphasizing interaction and communication, the discourse of national identity in Irish civic education attempts to avoid the marginalization of minority groups.

Similarly, the recent Ajegbo report that reviewed citizenship education in England resulted in a stronger emphasis on post-national (global) elements of citizenship (Osler 2008). However, the multicultural credentials of the UK have been criticized by some for failing to tackle the structural dimensions of social cohesion. Significant events such as the publication of the MacPherson report on institutional racism in 1999 after the death of Stephen Lawrence (Pearce 2005) and the more recent London bombings illuminate the de facto sovereignty gap experienced by some citizens. Although it is impossible to gauge the impact of recent reform, the present UK government is attempting to improve the inclusionary factors in national identity through schemes such as the ‘Islam and Citizenship Education’ programme for madrassas in the UK which teaches students aged 7-14 how to link Muslim values such as ‘shura’ with good citizenship.

Nevertheless, our analysis of the English curriculum highlights the difficulties of ensuring that civic education discourse resonates with the wide cross-section of students. A number of identities compete for adherents (Osler and Starkey 2001) in the modern public sphere and the nation-state must remain relevant and competitive in order to endure in the minds of students. Identity mongering is delicate, particularly regarding the psychological and emotional aspects of national identity (Guibernau 2007). Legitimate identity will prevail when it is simultaneously ascribed to by identity distributors and chosen by identity holders.

The French case, on the other hand, has not followed the wider European trend of post-national citizenship. Instead, the ‘national’ space remains and ethno-cultural values determined by the history of the French republic dominate construction of national identity (Osler and Starkey 2001). The narrow national lens allows for a single vision of laïcité only (Bourdieu 2002) and consigns citizens of migrant origin who may not comply with the
‘normal’ values to exclusion. The ramifications of assimilationist integration policy can be seen in the extreme disparity between opportunities for French citizens and French citizens of migrant, particularly Maghreb, origin (Oberti 2005). Violent manifestation of the frustration felt by migrant youths who are marginalized socially, economically and politically reflects the lack of recognition afforded to these citizens by French society. The diminished self-esteem that emanates from absence of due recognition (Taylor 1994) encourages the search for recognition elsewhere.

The limits of French self-understanding are illustrated by the attitude of Nicolas Sarkozy and intellectuals such as Kepel (2003) who mistake the social motivation of re-islamization movements as a political challenge. The move in January 2010 to ban the burqa on French territory and the misrepresentation of the Salafism as a single violent political movement (Kundnani 2008) has contributed to the exacerbation of sovereignty gap experienced by French citizens of migrant and Muslim origin. The ‘pensée unique’ (Bowen 2007) that dominates the French public sphere has jeopardized interaction between communities in French society. The assimilationist approach to civic education needs to be revised in order for French national identity to incorporate the variation and flexibility it requires to validate its claims of ‘Liberté, Egalité, Fraternité’.

Concluding remarks

Recognition of diversity is one dimension that determines the boundaries of national identity in education and is an indicator of the nation-state’s self-perception (Schissler and Soysal 2005). Analysing how nation-states recognize diversity in civic education shows how nation-states are responding in varied ways to the identity needs of a diversified citizenry. Indeed, whereas the assimilationist aspects of the French citizenship model (Soysal 1994) are particularly evident in lack of space afforded to alternative concepts of laïcité, the
multicultural approach in England encourages a plurality of perspectives organized around common values. Ireland’s intercultural focus also aims to build collective dialogues but emphasizes the cultural variation of citizens.

The function of national identity and citizenship has evolved with the speed and volume of global interaction (Crozier, Bhopal and Devine 2010) to include enfranchising individuals to participate in the multiple levels of society. National identity is the platform from which the individual avails of his or her citizenship rights; it offers citizens a stake in society (Ghani and Lockhart 2008). It is therefore crucial that the sovereignty gap is minimized by incorporating citizens of migrant origin in civic education discourse. Attempts at inclusion must also extend to the construction of EU citizenship to avoid EU citizens of migrant origin beyond the EEA being excluded (Keating 2009). It is beyond the scope of this article to comment on other curricular resources, however further research involving ethnographies of the school environment would improve understanding the link between citizenship education and the sovereignty gap.

Curriculum design should aim to include the variety of national identities that exist in contemporary society and curriculum developers should also consider the implications of identity-related bias in other subjects that extend beyond the confines of civic education. History, geography, religious education and language and literature contain discourses of identity that can potentially marginalize the efforts of civic education to establish intercultural identity discourses. Schissler and Soysal (2005) have noted that national narratives are no longer sufficient to educate students. The diversity of contemporary citizenries and the accompanying plurality of identities require civic education to offer students a framework in which they can make reasoned choice about their individual identities.

In England, France and Ireland, where a multitude of identities are being negotiated in the multicultural classroom, the sphere of education is a potential haven for an identity
sovereignty gap to establish itself (Pearce 2005). Educational marginalization and discursive exclusion in civic education are potentially a source of frustration for citizens of migrant origin that may not fit into the traditional homogenous ‘imagined community’ of the nation-state. Civic education that avoids essentialist paradigms of identity can contribute to the construction of a path to a citizenship and identity that avoids identity disenfranchisement. A more diverse citizenry necessitates a plurality of national identities and a more flexible self-perception of nation-states because the identities of twenty-first century citizens are no longer identical.

Notes

1. The term ‘citizens of migrant’ origin refers to individuals who experience incongruence between their citizenship and identity as a by-product of migration. This term does not intend to singularize this group of heterogeneous individuals.

2. The case of the UK requires nuanced use of the terms ‘England’ and the ‘UK’ and their respective adjectives given the devolved nature of education policy in the UK. The curriculum developed by the Qualifications and Curriculum Authority (QCA) is only implemented in England. However the citizenship education curriculum for England refers to the ‘UK’ as the nation-state and ‘British’ national identity. In this article, ‘England’ refers only to the area in which the curriculum is implemented.

3. Other forces such as regionalization, devolution and Europeanization also evoke changes in national identity, but fall outside the scope of this article (see Schissler and Soysal 2005; Cowan and McMurtary 2009).

4. This law was replaced by the Guigou law in 1998 which re-established the balance between citizenship by blood and citizenship by birth in France (Brubaker 1992).
5. For this article, only the ‘civic education’ section of the French ‘histoire, géographie, education civique’ curriculum was analyzed.

6. This law was derived from the report compiled by the Stasi Commission of which only a minority were representative of the ‘open laïcité’ school of thought (Willaime 2004). Consequently, the traditionalist concept of laïcité (Kepel 2003) is legally enshrined and students who object to it do not have an equal stake in the discourse because their views of laïcité are not recognized by the curricula.

7. Environmental stewardship describes the Christian approach to ecology and conservation (Berry 2006).

8. Kerr et al. (2004), for instance, identified four school approaches to citizenship in England. ‘Minimalist schools’ are at a planning stage whereas ‘focused schools’ have schemes in place to recognize achievement but still need to develop opportunities for active citizenship in community. ‘Implicit schools’ do not yet focus explicitly on citizenship in the curriculum but provide for active citizenship. ‘Progressing schools’ have an ethos that is participatory and supportive of the aims of citizenship education and draw on a wide variety of delivery methods. Further research on how the content of civic education curricula translates into the practical classroom environment would be useful, especially for the French and Irish context.

References


