

Human rights teaching: snapshots from four countries

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Abstract: This article examines how some schools with ethnically diverse student populations are teaching *about*, *for*, and *through* human rights. The author conducted a secondary analysis of qualitative data from a multi-site study, which included secondary schools serving students from immigrant backgrounds in four countries: Denmark, Germany, the Netherlands, and the United Kingdom (England and Scotland). The author found that schools taught *about* the history of human rights, rights in terms of national constitutions, and violations of human rights in the Global South; she observed fewer examples of human rights discourse addressing national and local issues. Across schools, students experienced respect of their human rights, *through* voicing their opinions and contributing to school-level decisions primarily on school councils. Some students developed knowledge, skills, and dispositions *for* exercising their rights and respecting others' rights as they deliberated issues and took civic action locally and globally.

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Introduction

At this moment in time, the world is witnessing a global health pandemic, a massive economic recession, daily examples of extreme inequality, and racial injustice. Such times reveal individuals' basic instincts for survival. To some it is a time to think and act first to protect their own family, community, and nation. To others, the times demand that we come together, as one human family to tackle overwhelming problems that cannot be solved alone and work harder for justice for all, particularly for the poorest and most vulnerable of our societies, near and far. The latter inclination makes clear the need for human rights education (HRE) now more than ever. As scholars Osler (2016) and Barton (2020) emphasize, HRE, unlike nationalistic approaches to civic education, promotes a broadly humanistic regard for all people, whereby individuals think and act in solidarity with all members of the human community. Additionally, HRE can expose young people to universal standards and means for protecting and ensuring rights for all.

As a teacher educator in the United States, I have had a longstanding interest in education for global citizenship and human rights education (Hahn, 1984, 1985, 2005). When I took my first sabbatical from university teaching over 30 years ago, I used the opportunity to research education for citizenship in diverse European countries (Hahn, 1998). Since then I have identified as a comparative civic education researcher, seeking opportunities to learn from researchers and practitioners working in varied socio-cultural and national contexts. Most recently I conducted a study of education for democratic citizenship in an age of globalization, migration, and transnationalism (Hahn, 2020), focusing on secondary schools serving many

students from immigrant backgrounds in four north European countries – Denmark, Germany, the Netherlands, and the United Kingdom (England and Scotland). From 2009 until 2018 I made repeated visits to schools, observing lessons in subjects like social studies, social science or citizenship, and interviewing teachers and students. The purpose of that study was to address questions related to a number of issues: transnationalism and student identity, teaching practices and globalization, migration, and transnationalism, and teacher perceptions of challenges and opportunities in teaching for democratic citizenship to students from immigrant backgrounds (Hahn, 2020). While collecting data for that study I noted examples of human rights education, although that had not been my original focus. For this article, I conducted a secondary analysis of my data for evidence to answer the question: *How do classroom teachers and schools enact human rights education in different national contexts?*

Literature review

The concept of human rights has a long history, from ancient Greece through the Enlightenment to the present; however, research on human rights education [HRE] is relatively new and theories of HRE are in their infancy. Synthesizing HRE scholarship, Bajaj (2011) concluded there were varied ‘schemas for theorizing the emergence, conceptualization, and implementation of human rights education across the globe’ (Bajaj, 2011, p. 485). She posited that the ideological orientations of most HRE initiatives could be classified in one of three categories: (1) HRE for Global Citizenship; (2) HRE for Coexistence (to sustain peace in post-conflict societies); and (3) HRE for Transformative Action (in the tradition of Paulo Freire’s work). Bajaj noted that although the categories were not mutually exclusive, they offered a useful way to conceptualize differing rationales for HRE. This article and the data upon which it is based fit within the category of HRE for Global Citizenship. Bajaj explained that HRE for Global Citizenship seeks to prepare youth for membership in an international community by developing their knowledge and skills related to universal values. From this perspective, the content knowledge that is taught includes international treaties and conventions, the words and practices of human rights leaders, and the history of human rights. This approach seeks to develop empathy and compassion, including solidarity with those who are oppressed; it promotes student actions such as letter writing, fundraising, and participation in Model United Nations programs. Rooted in a cosmopolitan framework, this perspective seeks to cultivate a sense of global citizenship, emphasizing interdependence and a need to work for justice everywhere. As I collected data for my study I observed these features of the enacted curriculum and instruction in the schools I studied.

Within the Global Citizenship tradition, many years ago, Lister (1981) distinguished teaching *about* human rights (knowledge and awareness); teaching *for* (the securing and maintenance of) human rights; and teaching *in* human rights (teaching in institutions that respect human rights). Thirty years later, the United Nations [UN] adopted a similar framework in the United Nations Declaration on Human Rights Education and Training (UN, 2011). It defines HRE as including teaching *about*, *through*, and *for* human rights. Education about human rights includes developing knowledge of human rights norms and principles, the values that underpin them, and the ways they can be protected. Education through human rights includes teaching and learning in ways that respect the rights of teachers and

students. Teaching for human rights aims to empower learners to exercise their rights and respect and uphold the rights of others. Taken together, these dimensions aim to foster a human rights culture.

As I used the UN (2011) framework to analyse and present the data from this study, I found much overlap. One instructional activity or experience often addressed two or even three categories. That was particularly true for activities that simultaneously respected students' rights and prepared them to take action to exercise their rights and respect those of others. Nevertheless, I found the framework useful for comparing HRE content and processes across schools and countries.

As the scholarly literature in human rights education has grown, most authors have advocated for what HRE should be, rather than reported empirical research. Among the empirical studies, several researchers have examined policy documents, curricula, and/or textbooks for their treatment of human rights content and pedagogy (e.g. Meyer, Bromley, & Ramirez, 2010; Osler, 2015; Skinner & Bromley, 2019). Other scholars have explored students' understanding of human rights and human rights-related topics using quantitative (Hahn, 2005; Torney-Purta, Wilkenfeld & Barber, 2008) and qualitative (Barton, 2020) methods.

There are, however, few studies of the enacted curriculum using ethnographic methods in naturalistic settings, such as classrooms, in different countries. One exception is Russell's study of the intended and enacted curriculum in post-conflict Rwanda (Russell, 2018). In that study, in addition to examining policy documents and textbooks, Russell observed classes in seven schools and interviewed teachers and students. She found the intended and enacted curriculum included global norms toward human rights and global citizenship as well as traditional approaches to building a national identity. She also found that human rights discourse focused on abstract principles and vague concepts, rather than tackling issues that were sensitive in the contemporary Rwandan context. Teachers and students tended to focus on noncontroversial aspects of human rights linked to international organizations, violations in other countries, and Rwanda's past history of genocide. Notably, teachers "constrained discussion of contentious" topics and avoided confronting human rights violations in present day Rwanda. In particular, there was no discussion of ethnicity and multiculturalism, which were sensitive topics following the Rwandan genocide. Additionally, non-controversial economic and social rights were prioritized over political rights, thus avoiding discussions that could lead to criticism of the current political regime. Russell emphasized that her findings were obtained in a particular context with a legacy of genocide and an authoritarian government, where freedom of expression was not guaranteed. She called for greater attention to context in conducting future research in post-conflict societies. Like Russell, I sought to gain insights into the enacted curriculum and pedagogy of HRE in a particular region, but unlike Russell, I situated my study in a region with a long history of democracy and human rights ideals.

Looking at previous literature on HRE in northwest Europe, where I conducted my study, I identified several empirical studies. Conducting a discourse analysis of Norwegian policy documents, Vesterdal (2019) demonstrated that human rights was a component of Norway's identity and foreign policy, conveying that the country was a peace-loving promoter of human rights and democracy. However, he found the country's approach in both foreign policy and education emphasized human rights violations in other countries. He concluded that although there was some limited recognition that human rights violations could occur in Norway, overall

'the message is that human rights are basically a problem outside Norwegian borders, where the violations are large-scale and extremely grave' (Vesterdal, 2019, p. 14). He argued such a view reproduces stereotypes and moral superiority, while maintaining Norway's reputation as a human rights-friendly nation. Osler (2015) similarly criticized Norway's policies and practices that focused on human rights violations abroad while failing to reflect critically on the country's human rights record at home. She argued that although the approach might encourage empathy and concern for oppressed people elsewhere, it could lead to citizens being blind to injustice for some individuals in their own country or community.

Denmark is another northwest European country with an international reputation for supporting human rights and was a specific focus of my study. In 2013 The Danish Institute for Human Rights [DIHR] published a report of their study of human rights education in primary and lower secondary schools (Decara, 2013). The researchers analysed policy documents, surveyed teachers, and conducted focus group interviews with students and teacher educators. They found that HRE in primary and lower secondary schools, as well as in teacher education programs (for teachers of that level), was 'diffuse and unsystematic.' For the most part, human rights were taught indirectly, without teachers referring explicitly to 'human rights.' The law governing *folkeskoler* (basic schools for pupils in grades 0 to 9 or 10) required schools to prepare young people for 'participation, joint responsibility, rights and duties in a society based on fundamental freedoms and democracy,' offering unrealised potential for including HRE. The DIHR, therefore, recommended that the Education Act be revised to specifically include attention to human rights, as well as to democracy and equality.

Writing about the Netherlands, Oomen (2013a) (like Vesterdal writing about Norway) noted that human rights held a central place in Dutch foreign policy. She explained the Netherlands used human rights law as a yardstick for others and was viewed as a guiding nation for international human rights law, particularly as host of the International Court in The Hague. However, argued Oomen (2013b), the Netherlands did not confront racism, domestic abuse, and other issues as human rights issues at home and HRE was not prominent in the Netherlands. She argued that while the Ministry of Foreign Affairs gave a high priority to human rights, it was her experience that departments within the Ministry of Education did not. Importantly, in 2006, at a time of increasing concern about growing numbers of immigrants with a Muslim heritage, the Netherlands adopted a new educational policy requiring primary and lower secondary schools to provide instruction for 'active citizenship and social cohesion.' The policy emphasized social skills and acceptance of basic Dutch values such as tolerance and non-discrimination, rather than referencing human rights. Citing a series of events, Oomen (2013b) argued the Ministry of Education lacked interest in developing a national action plan on HRE. The Ministry took the position that the topic was already featured in the curriculum, that under the Dutch principle of 'freedom of education' the government could not impose topics, and the government's priorities were language skills and mathematics. Other scholars, Bron and Thijs (2011), also reported that human rights was not a prominent topic in the curriculum for Dutch basic education. They explained that by leaving it to individual schools to decide how they would implement citizenship education, 'any emphasis on human rights or the rights of the child depends on the perceptions and motives of individual teachers' (Bron & Thijs, 2011).

Looking at HRE in Germany, Stone (2020) focused on the requirement that

immigrants demonstrate proficiency in the German language and understanding of German norms and values. To enable individuals to meet the requirements, the state provided instruction in the German language and an orientation course covering norms and values. However, the requirements, Stone argued, revealed a deficit perspective, assuming that newcomers were lacking essential skills and knowledge for their successful integration into German society. Stone conducted a content analysis of the unit 'Politics in Democracy,' which was part of the orientation course. He found that the course did teach about 'fundamental rights' in terms of rights guaranteed in the German Basic Law (the de facto constitution), rather than explaining that fundamental rights apply to all people in the world. He concluded that although there was potential to teach HRE to the adult newcomers, the course material revealed a missed opportunity in favour of a national approach to rights. Other scholars, Eksner and Cheema (2017), described a human rights project sponsored by an NGO in Germany. The goal of the project was to empower marginalized youth, particularly those who are marked as Muslim, to recognize and confront human rights abuses in their daily lives. The program was run by the Anne Frank Education Center in Frankfurt, which promoted democratic principles based on human rights and discussion of human rights issues from diverse perspectives. Although the authors of these articles made comments about the typical approach to civic education in German schools, which focused on political literacy and the German constitution, they did not study practices in primary and/or secondary schools.

In the United Kingdom (UK), when the Labour Party came to power in 1997, Prime Minister Tony Blair appointed an Advisory Group, chaired by Bernard Crick, to develop a plan to introduce Citizenship into the national curriculum in England. Subsequently, schools were required for the first time to deliver Citizenship in 2002. Critics of the Crick report, the subsequent legislation, and a later curriculum review led by Keith Ajebo argued that those initiatives gave insufficient attention to human rights (Osler, 2008). Further, as increased attention, particularly after the London bombings, focused on the need to promote 'British values,' critics such as Osler (2008) and Starkey (2018) called for greater attention to global values of universal human rights.

Also referring to UK policies, Jerome (2013) argued that from the time Citizenship was introduced there was an on-going tension as to whether the subject should promote human rights as universally held by all individuals or whether rights should be understood as conditional on the rights-bearer's acceptance of a social contract in which duties were specified. Jerome explained that New Labour under Prime Minister Blair wanted to promote a culture of universal human rights as associated with the Human Rights Act while simultaneously promoting a communitarian view of rights and responsibilities. The latter idea was extended by Prime Minister Brown who emphasized that for newcomers, citizenship 'should depend upon actively entering into a contract through which, by virtue of responsibilities accepted, the right of citizenship is earned' (Brown, 2008, as quoted in Jerome, 2013). Jerome argued the tension between understanding rights as rights for all humans (including children) and emphasizing rights and responsibilities as reciprocal was evident in the series of educational policy documents, including the Crick report, the Ajebo review, and the curriculum and assessment authority's policy papers. In addition, Jerome conducted case study research in two schools to determine how teachers and students understood rights. He found that at one school

teachers' and students' understanding reflected a 'vague communitarian model, in which responsibilities were always attached to rights and these were frequently seen as moral obligations, derived from relationships' (Jerome, 2013, p.10). At the second school there was more routine teaching about human rights, but 'this was most frequently discussed in relation to overseas contexts...as a framework for understanding conflict and the consequences of underdevelopment' (Jerome, 2013, p. 10). Jerome was sceptical of human rights being addressed in more depth in the near future as Conservative-led governments under Prime Minister Cameron (from 2010 onward) were increasingly hostile to the notion of human rights, the Human Rights Act, and decisions of the European Court of Human Rights.

In summary, findings from the available studies indicate several themes. Multiple researchers found that curriculum and/or instruction focused more frequently on rights as guaranteed by national constitutions than on international human rights; when instruction did address international human rights, it tended to focus on violations in other countries and did not use human rights language to describe issues in the home country. Further, although authors wrote that HRE should give attention to pedagogy, as well as content, most studies focused primarily on content or the knowledge to be acquired rather than on the processes of instruction and school ethos. I identified no qualitative studies of the enacted curriculum and instruction that examined HRE practices at multiple sites in and across countries. This study sought to build on the earlier literature by looking at how students were taught about, through, and for human rights in multiple schools across countries, with an eye toward whether instruction addressed local, national, and/or global applications of human rights.

Methods

This study is a secondary analysis of a qualitative data set that I generated in a study of civic education, globalisation, migration, and transnationalism in four northwestern European countries. In the original study I observed civic-related classes and interviewed teachers and students in secondary schools (for pupils aged approximately 11-18 years old) that served students from immigrant backgrounds.

Sample

I selected the four countries of Denmark, Germany, the Netherlands, and the United Kingdom because they were similar economically, politically, and culturally, yet had different approaches to civic education (Hahn, 1998). Importantly, these four countries shared a long intertwined history and historic commitments (interrupted by World War II and the Holocaust) to democracy and human rights ideals. As members of the Council of Europe (COE), these countries were signatories to the European Convention on Human Rights and, along with other member states, they adopted the COE Charter on Education for Democratic Citizenship and Human Rights Education (Council of Europe, 2010). Although the four countries had reputations as open and tolerant societies, in recent years all had experienced xenophobic incidents, populist political parties, and anti-immigrant movements.¹ Since 1985 I had been following developments related to civic education in those countries and I had colleagues who could assist me in recruiting schools.

Because the initial study focused on relationships between civic education and globalisation, migration, and transnationalism, I purposefully selected four or five secondary schools in each country that met these criteria: they served students

from immigrant backgrounds (immigrants, migrants, refugees, and children of immigrants); they reflected different types of schools characteristic of each country (such as gymnasia and integrated schools in Germany; mixed vocational and general, and more academic tracks in the Netherlands; comprehensive state schools in England and Scotland, including one single-sex school in England; and gymnasia and a basic school in Denmark); and they were located in different regions of each country. Most schools were located in urban areas (and in western states in Germany), where many immigrants lived. Although most of the schools served a population that was more than one-third from immigrant backgrounds, in each country I included one school with fewer immigrant-background students to capture a range of experiences. (See Appendix for schools and their demographics).

Procedures

I observed lessons in Citizenship in England and Modern Studies in Scotland, Social Studies and Social Science (*samfundsfag*) in Denmark, Study of Society (*Maatschappijleer*) in the Netherlands, and Civics or Social Studies in Germany. From 2009 through 2018 I made repeated visits to 18 schools for a total of 60 days.² In field notes I recorded the main content themes of each lesson and the instructional activities used. After each lesson, teachers debriefed with me (in English) to ensure I had understood the main ideas that were taught in Danish, German, and Dutch. I also conducted semi-structured 90 minute interviews in English with 52 teachers and I interviewed students (n=85) (in English) in small groups and at one school in each country as a whole class. Teachers and colleagues acted as translators as needed, particularly in interviews with lower track students in the Netherlands and some classroom observations in Germany. For this article, I drew primarily on observational data, as they contained more information about HRE than did the interviews. For further details of research methods see Hahn (2020).

Analysis

I read through all field notes and transcripts multiple times. For this analysis I initially coded examples of human rights, rights, civic action, and pedagogy. Then I went through the identified examples and recoded as evidence of teaching about, through/in, or for human rights. I compared examples across schools within each country, then compared examples across countries. I sought multiple examples of the same phenomena, contrasting examples, and unique examples to illustrate the range of practice.

Positionality

As an American, throughout my schooling I learned about rights in terms of the U.S. Constitution and Bill of Rights and the history of civil rights and civil liberties in the United States. While in graduate school in the 1970s I was introduced to the concept of global education or global perspectives in education, which included attention to international human rights. In the 1980s I attended several international conferences that addressed HRE and I began to write and speak about the need for U.S. schools to give greater attention to international human rights (Hahn, 1985). It was also in the 1980s that I began to conduct research on education for citizenship in the four countries that are the focus of this study. During that period, I met several British academics who were early advocates of HRE: Ian Lister at The University of York, Derek Heater at Brighton Polytechnic, and Jim Dunlop at Jordanhill College, Glasgow.

As a teacher educator, for many years I included the topic teaching international human rights in the global perspectives as part of my social studies methods courses for beginning and experienced teachers. Despite these experiences, I did not approach this study initially in terms of HRE, but rather as a study of education for democratic citizenship, with attention to increasing transnational diversity in student populations. Although I had been studying civic education and civic culture in the four countries of interest over many years, as an English-speaking American academic, I remained a cultural outsider with both advantages and disadvantages. On the one hand, I likely noticed some things that an insider would take for granted. On the other hand, no matter how much I checked my evolving understanding with insider key informants, probably there remain cultural understandings that I misunderstood or missed altogether. Conducting research across national contexts, I am a constant learner, which makes such work fascinating.

Limitations

It is important to keep in mind that the teachers and schools in my sample were not selected because of a commitment to human rights education, nor did I explicitly ask about their views of human rights education. Rather, while looking at citizenship education in 18 schools, I obtained “snapshots” of how human rights teaching can address similar goals yet vary in practice as it reflects the educational policies, pedagogical culture, and the wider socio-cultural context of a country. Like all qualitative studies in naturalistic settings, this one reflects limitations and benefits. My findings are limited to the schools and classes I studied and cannot be generalized to all schools. Rather, the findings might suggest hypotheses and questions for further research and/or offer insights for practices and policies that educators in other contexts might adapt. Further, what I observed may not have been ‘typical’ of practices on the days I was not present and other observers may have interpreted the settings differently. I had the benefit of observing the enacted curriculum in real classrooms across time, schools, and countries.

I have organized my findings by country because teachers in the same country are influenced by similar educational policies, pedagogical traditions, and cultural factors. Within countries, I describe human rights education in terms of dimensions identified by Ian Lister (1981) and used by subsequent human rights educators over the years (UN, 2011): teaching *about* human rights (knowledge and understanding); teaching *for* (the securing and maintenance of) human rights; and teaching *in* or *through* human rights (teaching in institutions that respect the human rights of teachers and students).

Teaching human rights

In Denmark

Students in Denmark attend the basic school, called a *folkeskole*, from years 0 (kindergarten) through 9 or 10; they usually stay with the same class of students from years 1 through 9/10 (and either the same teacher for 9/10 years or one team of teachers through primary grades and another team through the upper grades). During this time, students study history in grades 3 through 9 and social studies (*samfundsfag*) in years 7-9, which includes politics, economics, sociology, and international relations. Most students subsequently attend a gymnasium for three years, where they take history and social science (also called *samfundsfag* and covering politics, economics, sociology, and international relations) or they enroll in

a two-year program to prepare for the 'HF' exam. Notably, *folkeskoles* are required to teach democracy by modelling democratic practices, while in gymnasia, teaching should contribute to developing students' interest in and capacity for active participation in a democratic society. The subject social science aims to develop a critical-perspective in students.

Teaching and learning about human rights

Although there was an official chronological 'canon' for history, teachers with whom I spoke seemed to see it as a general guideline primarily for *folkeskoles* and did not report feeling constrained by it. The canon included several human rights-related events and the specific topic 'human rights' in the post-World War II period. Gymnasium teachers and students explained that in history and social studies/social science classes (as well as in most other subjects), students in consultation with their teachers decided what topics they would study and how within broad guidelines. In the schools I studied, gymnasium students had chosen to study the topics migration, the Danish welfare state, and political topics, which implicitly teach about human rights without using the specific label 'human rights.' One gymnasium social science class had chosen to study human rights explicitly, including the Universal Declaration of Human Rights. Many of the immigrant-background students were in the HF track, which was more prescriptive. For example, the Ministry of Education specified that the topic 'democracy and human rights' was required.

Gymnasium students were required to do interdisciplinary inquiry projects (modified somewhat since 2016). Classes I visited at Syd and Oester Gymnasia³ did projects related to human trafficking, South African education, and one called 'Blood in the Mobiles' to create awareness of child labour in the Democratic Republic of the Congo, from where minerals were mined for mobile phones. By taking civic action after researching these topics, students learned both about human rights and taking action as global citizens. One day I observed a group of teachers and students who were generating plans for their global school. The students discussed what they could do to avoid a 'saviour-victim' approach when tackling issues in the Global South. Despite this concern among some students, others explained to me they were undertaking a project 'to help' children in a partner school in South Africa (7/10/12).

Learning through and for human rights

Importantly, Danish students learn through human rights as they participate in frequent deliberative discussions and decision making, such as in the planning session for the global school noted above. Many students reported that they had participated in numerous discussions – both in class and among peer groups – about a newspaper publishing a political cartoon depicting Muhammad as a terrorist. The students said that in those discussions they talked about balancing freedom of speech and respect for diverse religions and cultures.

Folkeskole classes had regular class meetings where they discussed issues related to student behaviour, planned class trips, and advised their representatives to the student council. Student councils in both *folkeskoles* and gymnasia engaged in lively discussions about issues that students raised. The national organization for student councils in gymnasia sponsored an annual Operation Work Day, when individuals stayed out of school to spend the day raising money for a designated project. During the years I visited Danish schools, students raised money for projects in Myanmar, Niger, and the Amazon basin. One year a student council at Oester

Gymnasium was especially active, sending representatives to the Copenhagen Youth Climate Conference and sponsoring a whole school debate on whether they should become a Fair Trade School. Students, teachers, and canteen (cafeteria) workers participated in that school-wide deliberation. The president of the student council that year also told me that they sponsored a Culture and Debate group where they ‘talked about human rights issues.’ This school was more activist and globally-oriented than the others I studied, yet across schools, many students had participated in Operation Work Day, student councils were important to the life of the school, and students described many class discussions in which they expressed their opinions about public policy issues. Clearly, students’ rights to express their opinions and influence the learning environment were respected. In addition, as they experienced democratic deliberation and decision-making they developed skills and participative dispositions for exercising and working for human rights in the present and future.

A number of teachers and students made comments similar to those of the student who said, ‘being Danish means having a commitment to the Danish welfare system, participation, and supporting free speech’ (3/10/10). Such commitments can be seen as important to preparing young citizens for a society that respects human rights; alternatively such notions can be seen as implying that those values are uniquely Danish and immigrants are deficient in those values, which they must acquire to successfully integrate into Danish society.

In Germany

In Germany’s federal system, education is the responsibility of the federal states and as a consequence titles and content of courses, required hours of instruction, and school organization (comprehensive or tracked by ability) varies from state to state. Nevertheless, in all the schools I visited in three different states, students took a course in something like social studies every year they were in school.

Teaching and learning about human rights

The social studies courses included topics related to human rights. For example, one grade 9 social studies textbook discussed human rights since the French Revolution, citing articles from the Universal Declaration of Human Rights. It discussed rights violations in the Democratic Republic of the Congo and Myanmar and conflicts and crises in Africa, the Middle East, and Asia, and included a highlighted section on ‘child soldiers.’ The textbook also showed human rights violations in Germany in the past, including child labour during the Industrial Revolution and the Holocaust in Nazi Germany. A chapter on ‘Youth and their Rights’ addressed contemporary issues.

Further indications of students learning about human rights came from teachers saying that year 9 students learned about Germany’s Basic Law (constitution), the French Revolution (as the foundation for human rights), migration, and young people and the law. With respect to global citizenship education, but not explicitly human rights, I observed multiple lessons in social studies classes on climate change, renewable energy policies, and financial and economic policies at the national and European level. Additionally, several teachers and students noted that students learned about multiculturalism in their language lessons, such as in the English-speaking or Spanish-speaking world in their English and Spanish classes.

I also observed history lessons on Nazism and the Holocaust and I accompanied a 9th grade class from Nordweston Stadtteilschule to a reconstructed work camp. One of the teachers told me she wanted her students to learn from the

visit 'that average people were in the SS' (6/5/2012). At the camp, when students asked 'why didn't they run away?' guides explained that people living near the camp were complicit and would likely have reported any escapees. The guides and the displays did not tell a story of victimization alone, rather they discussed the perpetrators and resistance in the camps. A colleague who also accompanied the field trip explained to me that it could be a challenge to teach this topic to students of migrant backgrounds because they sometimes raise the point: Why should we study this? This was a German problem. That is why, my colleague emphasized, it is important to teach that the Holocaust was a human problem that could happen again, anywhere.

Learning through and for human rights

In the entrances to several German schools I observed signs that read 'School without Racism, A School with Courage.' Schools received the designation when students voted to become such a school and pledged to hold events against racism. One teacher explained, however, that although achieving that status had been meaningful to the cohort of students who made the pledge and worked for the designation, with time she did not think it meant as much to subsequent classes of students.

The schools I visited in Germany all had elected student councils, with teachers and students noting that some years they were more active than other years. For example, when one federal state government adopted a policy requiring all comprehensive schools to distinguish between a pre-university and a less-academic track, the student council at a school that would be affected organized a large demonstration in the city centre and the student council president spoke to the media. Eventually, the policy was modified (perhaps in response to adults' objections more than students'; however, either way students observed that civic action can affect policy).

Teachers in two schools in Germany commented that students had raised money for victims of disasters. These included victims of an earthquake in Haiti and the earthquake, tsunami, and nuclear power plant meltdown in Japan.

Importantly, like students in the Danish schools in my study, the students in the German schools were most likely to learn through human rights practices as they participated in frequent discussions of public policies. In all of the German schools I observed *Pro-Contra* discussions. These were discussions in which students gave arguments for (pro) or against (contra) a particular policy, such as lowering the voting age in their state's elections or changing asylum laws. At Nordosten Gesamtschule, a banner in the school lobby welcomed visitors to their 'European School.' On one of my visits I observed the celebration of Europe Day, when classes were suspended and students participated in several Europe-related activities. The older students (approximately aged 15-18), heard a presentation from their Member of the European Parliament (MEP), who spoke about European economic, financial, and migration policies. That was followed by a challenging and wide-ranging question and answer session.

After the MEP left, the students observed a student-run debate on the question: Should Turkey be admitted to the European Union? One student gave the arguments for and another gave arguments against admission. Then the discussion was opened up to everyone in an auditorium full of about 200 students standing and expressing their opinion. The MEP had earlier stated that Turkey would have to comply with human rights laws and regulations if it were to join the EU. The students'

arguments referenced human rights criteria as they mentioned ending torture, ensuring equal rights for women, and improving rights for Kurds. One girl stood up and said, 'after World War II, there were still Nazis and other countries helped Germany to become a normal country...so we should help Turkey become a respecter of human rights' (5/26/11). Clearly, these students had learned the language of human rights and many were passionate about applying those principles to contemporary issues.

In the Netherlands

When students in the Netherlands leave elementary school at the end of grade 6 (about 12 years old), they follow one of six tracks, from vocational to pre-university academic tracks. Only since 2006 have elementary and lower-secondary schools (for students to age 16) been required to promote active 'citizenship and social integration.' Following the Dutch principle of 'freedom of education,' it has been left to each school to decide how it addresses the cross-curricular theme with attention to democracy, diversity, tolerance, and acceptance. Additionally, at the time of the study, secondary schools offered a one- or two-year course in the study of society (*maatschappijleer*), which addressed the topics politics, the multicultural or plural society, media, youth, criminality, and work. History was taught as a separate subject, or in some schools combined with the study of society.

Teaching and learning about human rights

Zuid Schole featured human rights in two art installations. A large fingerprint was painted over the United Nations Declaration of the Rights of the Child on a wall in a stairwell that students used multiple times daily. On another wall, portraits of human rights leaders including Nelson Mandela and Martin Luther King Jr. were painted. Despite these visible symbols, none of the teachers at the school mentioned teaching human rights in the subject *maatschappijleer* (study of society). They did, however, teach history lessons about Nazism, the Holocaust, the Nazi occupation of the Netherlands, and post-World War II immigration.

At another Dutch school, West Schole, students did study the topic 'human rights' explicitly, along with 'Dutch rights,' in their *maatshappileer* class. In teaching Dutch rights, they focused primarily on Article I of the Dutch constitution, which ensures equality for all and says there shall be no discrimination. At this school, like the one noted above, students had history lessons about World War II, the Holocaust, and immigration. They also studied the European Union and the United Nations.

Teaching through human rights

The four Dutch schools I studied had student councils, reflecting a relatively new policy. However, unlike in the other countries in this study, the student councils in these schools were not elected, but were made up of volunteers and operated like a club, although (unlike schools in the other countries) the schools did not have clubs. Because the student councils were not elected in competitive elections, this could be seen as a missed opportunity to experience the human rights principle of electoral representation. Two of the schools did, however, hold mock elections at the time of the general election.

Teaching for human rights

Students in some schools were encouraged to take action to help others, which might enable them to develop skills, values, and dispositions for taking action to exercise and support human rights in the future. At two schools, students raised money for victims of disasters. In only one Dutch school, Zuid West Katholieke Schole (ZWKS), which was located in a small town, did a teacher report there was a local tradition of volunteerism. For several years the Ministry of Education required all students to engage in a certain number of hours of 'community service,' but eventually the policy was dropped. When the policy was in effect I visited West Schole, which was a pioneer in offering community service opportunities to students. I observed students visiting a home for elderly people. The next day, young people from immigrant backgrounds (with families primarily from Suriname) would be taking the white Dutch elders to a nearby forest. A few years later, however, students in only one 'profile' (specialty) at that school continued to engage in community service—primarily serving guests at school functions. Another school, Noord College, asked students to keep track of the number of hours they helped others, such as helping neighbours, family members, and small children.

Across schools in the Netherlands, teachers emphasised the importance of teaching students to respect different views, as well as cultures. For example, one teacher at ZWKS explained, 'students need to recognize different ideologies and different views...not to have a right or wrong position but to know the alternatives and that positions depend on your world view' (4/20/12). Another teacher, at Noord College, explained, 'The Plural Society is a topic we teach. It is perfect that we have 55 nationalities at the school...no one is considered strange. They accept differences and learn to respect different opinions' (9/29/16).

In the United Kingdom

I found the greatest variation among the schools I studied in the United Kingdom. Because each nation – England, Scotland, Wales, and Northern Ireland – determines its own educational policies, it was not surprising that I found differences between the schools in England and Scotland in my study. In addition, within England I observed a wide variation in practices. Since Citizenship was required in 2002, it has been left to each school to decide how it would implement the mandated subject. Additionally, since the Labour Government was replaced by a series of Conservative-led governments beginning in 2010, Government policies have deemphasised citizenship education and promoted other initiatives like Academies and Free Schools, and the teaching of 'Fundamental British Values' (FBVs).

Teaching about human rights

In North Street School, in Scotland, students took the subject Modern Studies, which included a unit on 'Representation and Democracy.' In it, students learned about the Scottish Assembly and the Westminster Parliament. I observed lessons in which students simulated a general election and studied United Nations agencies. Two English schools combined Citizenship with Personal, Social, and Health Education (PSHE), which was taught by non-specialist 'tutors' (like German class teachers or U.S. homeroom teachers). When one of those schools became an Academy, it dropped Citizenship lessons completely; students then had weekly news quizzes in 'tutor time' and a school administrator gave talks on 'Democracy' and 'Fundamental British Values' in two school assemblies. In history lessons, students in various schools

studied the Trans-Atlantic slave trade, child labour in the Industrial Revolution, Nazism and the Holocaust, and the U.S. Civil Rights Movement. In none of these three schools did any teachers or students mention that they had explicitly addressed the topic of human rights.

In contrast, Southside Girls School (SGS) gave Citizenship and HRE a very high priority. Initially, all students prepared to qualify for a Citizenship General Certificate in Secondary Education (GCSE). Later, Citizenship became an optional course for the GCSE. Nevertheless, all students continued to have lessons in Citizenship as part of Social Studies in years 7 through 9, which included the topic human rights; and some students chose the optional Citizenship subject for years 10 and 11 in which they studied many issues connected to human rights. In order to fulfil requirements for 'controlled assessments,' students chose to explore an issue among several possibilities. They were required to research the issue, explain how it was a local, national, and/or global issue, interview individuals with different opinions on the issue or research different views, identify related articles in the UNDHR and/or Rights of the Child, write their opinion about the problem and possible solutions, and finally decide on and execute an action they would take. Some of the issues which students investigated and took action for were: Syrian refugees, mental health, climate change, clean water, food poverty, a living wage, housing benefits, funding for women's refuges, and lowering the voting age to 16.

Teaching through and for human rights

East High School recognized Black History month each October with wall displays and a school assembly. For several years, they also had an event celebrating refugees, as their school population contained 192 students from refugee families. Students in the four British schools I studied had frequent charity drives, with students raising money for many local, national, and international causes that were related to human rights.

The British schools all had elected student councils until the one Academy replaced its council with a group of teacher-appointed 'Leaders.' Reflecting the idea in the UN Convention on the Rights of the Child and European human rights law requiring students to participate in decisions that affect their schooling, 'Student Voice' programs were prominent in the British schools I studied. As part of the Student Voice programs at East High School and SGS, some students had been trained to observe lessons and give feedback to teachers and some students participated in the process of interviewing candidates for teaching and administrative posts at the schools. Even the Academy solicited student opinion, with surveys on topics like the learning environment and bullying.

HRE was most pervasive in the one school that gave the subject Citizenship a high priority, Southside Girls School. The active student council worked hard for several years for their school to become one of UK UNICEF's Rights Respecting Schools. The school had an active Amnesty International Club, which sponsored activities to involve the whole school in letter writing and other campaigns. There was also a Model United Nations Club that participated in city-wide conferences. Citizenship lessons addressed human rights topics from the local to the global. Each year students participated in civic action projects, working with local charities and national NGOs. They worked on campaigns against female homelessness and 'forced marriages,' and for affordable housing, a living wage, and girls' education globally, as well as a campaign called 'Refugees Welcome Here.' They also worked on local and

global campaigns for clean air and water, as well as addressing climate change. In Spring 2019 some of the students participated in the 'climate strike,' boycotting school for a day to draw attention to the climate crisis. The Citizenship teachers decided to show their solidarity with the students by carrying placards that read 'We support our students' in front of the school at lunch time. As noted earlier, when SGS students wrote up their projects for class assignments and for their GCSE assessment, they were required to reference the appropriate article from the Universal Declaration of Human Rights and/or the Rights of the Child. Although this is the only school in my study where HRE permeated the whole school, it showed me what is possible.

Summary and discussion

Because the samples of schools that I visited in each of four countries were not representative ones, it is not appropriate to generalize to all schools in a given country. Additionally, it is possible that students received more lessons about human rights at times when I was not present, although this was not mentioned by teachers or students. Other researchers who plan studies explicitly focusing on HRE in these and other countries should from the beginning systematically examine curricular documents and textbooks for human rights content and directly ask students and teachers about the teaching of human rights over the course of a year. As this represents a secondary analysis of an existing dataset, I was not able to do that. Nevertheless, from my snapshots in schools, I did obtain insights that reinforce and extend findings from other studies, which might be useful to future researchers and practitioners.

Let me begin with what I observed about teaching and learning *about* human rights. Like Russell (2018), I observed that across schools in this study in the four countries, students studied about the history of human rights-related events such as the Trans-Atlantic Slave Trade, the French Revolution, the Holocaust, and the Civil Rights movement. However, in most of these cases they did not use the language of human rights. As Oomen (2013b) and Stone (2020) found, I observed in the study's schools in Germany and the Netherlands, students studied about rights issues in terms of their national constitutions. One Dutch teacher reported that his school taught the topic 'human rights'; however, I did not hear that term used in the other Dutch schools. In one German school, students were knowledgeable about and used the language of human rights as they tackled global issues, such as how the international community should deal with countries that violated human rights.

Like Jerome (2013), I found that several UK schools taught the topic 'rights and responsibilities' but only the one Rights Respecting School explicitly taught the topic human rights and asked students to apply human rights principles in their investigations of numerous issues. Osler (2008) and Starkey (2018) had warned about the danger of focusing on 'British values,' including democracy, the rule of law, individual liberty, and tolerance of those with different faiths and beliefs as if these were unique to Britain. I similarly heard reference to Dutch values of non-discrimination and freedom and Danish values of democratic participation and freedom of expression. Without referencing standards that apply to all humans, students might mistakenly believe their country is the only one holding such values and that individuals who live in their country but are not national citizens do not also have rights.

Decara (2013) found that *folkeskoles* in Denmark tended to approach human rights indirectly, rather than explicitly using human rights language. However, I found a more complex picture. While listing many topics from Danish national history, the chronological canon for history instruction did list the topic United Nations Human Rights for the 20th century. For students older than 16, the topics for the HF exam also included the topic ‘democracy and human rights.’ Danish gymnasium students deliberated and decided what and how they would study topics; consequently, only one gymnasium teacher mentioned that a class had decided to study human rights per se. Other gymnasium students had learned about violations of human rights as they undertook multidisciplinary inquiry projects like the ones I observed about conditions in the Congo and South Africa; and many Danish students also learned about human rights violations in countries that were the focus of Operation Work Day. As Vesterdal (2019) and Osler (2015, 2016) noted, such an approach can convey a sense of moral superiority over those who live in the Global South. Interestingly, it was a group of students in one Danish gymnasium who articulated the potential problem of instilling a saviour-victim attitude toward the Global South. A similar problem can ensue when students raise money for victims of disasters around the world, without taking similar action for those whose human rights were not being met in their local and national communities.

Osler (2016) and Gaudelli (2016) have written about the need for students to become aware of the everyday experiences of human rights in their own communities, as well as to develop empathy and solidarity with human rights activists in communities far and wide. In my study only one school, SGS, taught about human rights at the local, national, and global levels. The students had numerous lessons and projects that referenced human rights documents and they engaged in campaigns to address human rights at all levels.

Numerous authors recommended that HRE should not be limited to knowledge about human rights, it but should also provide students experiences in and through human rights (in institutions that respected human rights), and for the exercise of their rights and respect for others’ rights. I did not, however, locate any previous empirical studies that identified if and how those goals were being implemented. I found that all of the schools in my study offered some opportunities in and through human rights although they did not label them as ‘human rights in action. Students did have experiences that enabled them to exercise their rights and to develop skills and attitudes for (securing and maintaining) human rights. In particular, the schools provided opportunities for students to discuss and debate about political and social issues and to make decisions that affected life in their school community. These opportunities were extensive in three British schools (particularly SGS and excluding the Academy) and in the Danish and German schools I visited. In lessons and in student extra-curricular activities students deliberated about issues in their school and in the wider society. Student councils were more or less active from one year to the next, and one school to another. Clubs were less common, but the few schools that had Amnesty International, Model United Nations, or a Culture and Debate Club enabled students to exercise their rights as global citizens working to ensure rights for all. All of the schools in the study reflected Bajaj’s (2011) description of HRE for Global Citizenship, with the varied ways they enacted education about, through, and for human rights.

One theme that emerged from my study was that visible symbols of a human rights culture can lose their value over time as individual students and teachers move

on. At one point in time a class of students deliberated and took seriously the decision to become a Fair Trade School and other classes committed to being a School without Racism, a School with Courage. Similarly, adults planned inspirational art installations at one school to feature the Rights of the Child and human rights leaders' portraits; they may have hoped, but could not guarantee, that the hundreds of students who passed those images daily would absorb their meaning. Without deliberate efforts to keep such symbols alive, they can easily become forgotten messages from earlier times. Alternatively, they can continue to inspire new generations if committed teachers are alert to their potential and deliberately use the symbols as catalysts to ask students to reflect on what the symbols could mean in the present in their multiple communities – local, national, and global.

Recently, Parker (2018) has called for more robust HRE than that which predominated in the past. He argues that we should develop and enact curricula that provide students with 'powerful knowledge.' He explains that such knowledge includes abstract concepts, which are powerful because they can be applied to numerous cases across time and space. He suggests several concepts that can contribute to a robust HRE, including universal rights, human dignity, justice, dissent, and activism. Parker recommends that curriculum scholars work with human development specialists to identify conceptual progressions that will connect young people's everyday experiences and knowledge with powerful concepts, thus enabling youth to develop deeper understandings of the wider world. My snapshots indicate that the seeds of such an enacted curriculum exist in some schools. Although some examples fall short of the ideal as they use only national referents rather than those of human rights and/or they focus on violations in the Global South or in the national past while overlooking violations close to home in the present, those seeds could be nurtured and developed into a more robust HRE. Importantly, some students are already learning powerful concepts and principles articulated in international documents which they are able to apply to diverse cases. Although I only saw students at one school using human rights discourse extensively as they studied issues and engaged in civic action at the local, national, and global levels, their experiences indicate what is possible with a cohesive, carefully sequenced, robust HRE.

Finally, it is clear that across schools and countries, the ways in which human rights education is carried out varies in light of the interest and commitment of individual teachers and schools, as well as the pedagogical culture of a society. Human rights is not merely a topic to be studied but a way of life and worldview or perspective to be experienced.

Notes

¹ These include but are not limited to the following: In Denmark the rise of the Danish People's Party and the incident of a political cartoon that depicted Muhammad as a terrorist, which generated protests across the globe; In the Netherlands, international media covered the killing of two individuals who argued against 'the Islamization of society' and Geert Wilders' anti-immigrant party obtained seats in Parliament; in Germany, the rise of the far right political party Alternative for Germany; and in the United Kingdom, earlier anti-immigrant rhetoric of the British National Party and more recently anti-immigrant and anti-Europe sentiments of the UKIP and Brexit parties.

² I visited most schools three times over this period. However, I was only able to visit one city in Germany and one city in Denmark once. At the other end of the spectrum, I visited one school in England, SGS, 10 times because it was such an 'information-rich' case.

³ Names of schools are pseudonyms.

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Appendix: Schools and their demographics

Country	School *	Demographics**
UK-England	Southside Girls School	95% 'ethnic minority.' Most 2 nd generation Bangladeshi + some Somali, E. European immigrants
UK-England	East High School	92% 'ethnic minority' diverse heritage countries include Turkey, Bangladesh, Pakistan, India, Somalia, etc.
UK-England	West Academy	10% 'ethnic minority' Most 2 nd generation Pakistani heritage
UK-Scotland	North Street School	50% ethnic minority, speaking 46 languages (hyper-diversity)
Denmark	Centrum Skole	90% immigrant & 2 nd generation from Turkey, Pakistan, Palestine etc. Immigrants from Afghanistan, Iraq, Somalia, Morocco, Syria, Ghana, Albania, Georgia (country)
Denmark	Oester Gymnasium	40% immigrant background, most 2 nd generation, from Middle East, Africa, South Asia
Denmark	Nord Gymnasium	30% immigrant background, most 2 nd generation from 30 countries
Denmark	Vesterskole	22% immigrant backgrounds
Denmark	Syd Gymnasium	10% immigrant backgrounds, including from Turkey, Afghanistan
Germany	Nordosten Gesamtschule	Backgrounds: Iraq, Afghanistan, Turkey, Palestine, Panama, Korea, Egypt, Poland, Russia, Vietnam
Germany	Gymnasium Nordwesten	60% with 'migration backgrounds' from Turkey, Macedonia, Ghana, China
Germany	Nordwesten Stadtteilschule	15-20% migration backgrounds from Turkey, Afghanistan, Saudi Arabia, India, Poland, Russia
Germany	Sudosten Schule	Backgrounds from Turkey, Morocco, Afghanistan, Iran, Pakistan, Kosovo, Croatia

Germany	Gymnasium Sudwesten	90% migrant background. 40 languages (hyper-diversity), Iran, Afghan, Bangladesh, Morocco, Russia, Serbia, Vietnam, China, Japan etc.
Netherlands	Zuid vmbo	Many families from Turkey & Morocco. Also from Curacao, Indonesia, Aruba
Netherlands	West vmbo	Most 2 nd & 3 rd generation from Suriname & many from Turkey, Morocco
Netherlands	Noord College	50% new immigrants. 50% went to Dutch elementary schools, most 2 nd generation, from 55 countries (hyper-diversity), e.g. Turkey, Morocco, Syria, Ghana, Antilles, Suriname, Ethiopia, Eritrea, Ecuador, Italy
Netherlands	Zuid West Katholieke Skole	10%-- Most in mavo track, from Turkey, Morocco, Poland, Russia, Indonesia, Vietnam, Spain

*Names of schools, as well as of teachers, here and in the text are pseudonyms. I added a 5th (*folkeskole*) school for Denmark, and an additional school for Germany that I was only able to visit once.

**Demographics were reported to me by teachers and principals. They tended to use general percentages and they used different terms in different countries, such as from ‘ethnic minority communities’ in England and ‘migration backgrounds’ in Germany. I have used the term ‘hyper-diversity’ when a school contains students from as many as 40 national backgrounds. I have included urban schools with a majority of students from immigrant backgrounds and schools in towns with many fewer immigrant-heritage students to reflect the range that exists.

***I have noted the grade or year in school in parentheses, although terms vary across countries. For example, in England, teachers refer to years 7 through 11 and in Scotland, teachers use the terms S1 to S4 for secondary school Standard 1 to Standard 4. Because Danish basic schools (*folkeskoler*) include grades 0 to 9 or 10 and many students take a year or more out before attending gymnasia or HF programs, my citing years 11-13 is an approximation.