

# CITIZENSHIP EDUCATION AS A CONCEPT AND ITS IMPLEMENTATION IN DIFFERENT COUNTRIES

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**ABSTRACT:** The importance of citizenship education in ensuring that students are well-informed and educated citizens makes it one of the subjects that cannot be separated from the field of education. The main topic of this paper is the concerns surrounding citizenship education, which begins with a discussion of its definition, purpose, elements, and application methods in various countries. The literature study method, which draws on library and online resources, was used to obtain information for this study. In addition, information was acquired from books, papers, newspapers, magazines, and journal articles. The results of this study explain how citizenship education is taught in both general and special education, as well as how the implementation of citizenship education varies depending on the country.

**KEYWORDS:** Acquisition, Citizenship, Civic Education, and Citizenship Education



#### INTRODUCTION

Currently, the world is undergoing advancements in various fields, including education, which is progressively leading to rapid advancement. Creating a learning environment is crucial since education aims to develop a learner's potential on all levels, including religion, personality, self-control, intelligence, and skill. As a result, education will always alter to reflect developments made around the world. Education is defined by psychology as the conscious direction and leadership provided by an individual or group to promote the learners' growth toward a particular objective. Since it aids students in developing their personalities and character, citizenship education is the subject we need to cover in order to meet the educational goals.

A person who is a legitimate citizen and who owes allegiance to the country of residence.

Such a person is fully entitled to civil and political rights in the country in which they reside, and they are prepared to pay the ultimate price to defend their state or country. Therefore, the term "citizenship" refers to the position of a person who has full legal and political rights in a state or country. Therefore, it may be claimed that not everyone living on a country's territory is a citizen (Edinyang and Yusuf, 2021).

The idea of citizenship education is centered on educating people about their rights, obligations, and roles as citizens of a given nation. The implementation of citizenship education differs throughout nations. Its goal is to create knowledgeable, engaged citizens who are aware of their rights and obligations and actively involved in their communities and society (Spiro, 2017). While some nations may use less structured methods, others may have formal citizenship education programs integrated into their school curricula. For instance, in the United States, Citizenship Education is frequently taught through Social Studies classes, where students learn about the country's history, government, and democratic principles. The content and methods of citizenship education also vary depending on the values, political system, and cultural context of the country. Citizenship education may be taught as a separate subject in several European nations, with a focus on issues like human rights, democracy, and civic engagement.

The idea of teaching citizenship in schools is a relatively new one in human history. However, Civic Education or Citizenship as a subject in the classroom has a big impact on how pupils develop (Barnes, 2018). Citizenship education can refer to a variety of concepts, including a person's political rights, social interactions, and legal standing within a state. All activities that affect people's commitments, abilities, and behaviors as existing or potential community members are considered to be part of citizenship education, according to Levinson (2014). They are crucial ideas in the philosophy of education because the purpose, goals, and approaches associated with citizenship education have a considerable impact on many professions, particularly the field of education.

Almost every country in the world has recognized the existence of citizenship education, while each has used and implemented the notion in a distinctive way (Galston, 2007). Citizenship education aims to produce good citizens who can assist the nation and the state. To put it another way, civic education assists in the development of intelligent and responsible citizens. Because of this, the writer of this essay explores the main principles of citizenship education and how they are applied in various countries. Citizenship education is provided by both the public and private sectors of society. Similar to how families and civil society participate in



citizenship education both explicitly and implicitly, schools in different nations use a range of techniques to deliver it.

#### **METHODOLOGY**

This essay was created via a literature review process or research methods that drew data from libraries. Books, papers, magazines, journals, newspapers, and other media may also contain the information. The research on Civic Education and how it is practiced in various countries is the focus of the library items explored in this article. The results from the numerous prior references are categorized in accordance with the stages of development of the approach described in the article. The author used the information to process, compare, and comprehend the various data sources obtained from a reference source after the materials were collected and structured. The research's results were subsequently collected into an article by the author.

#### FINDINGS AND DISCUSSION

# **Findings**

Citizenship Education is a topic covered in practically every country globally, and the author of this study looked at how it is implemented in various nations. Citizenship education goes under many various titles around the world, including the following:

- 1) Pendidikan Kewarganegaraan Indonesia
- 2) Education on Citizenship in the United Kingdom
- 3) Civic Education in the United States
- 4) Ta'limatulMuwwatonah / Tarbiyatul AlWatoniyah in Middle Eastern nations
- 5) GrazhdanstvoObrazovaniya in Russian
- 6) Sachunterricht in Germany
- 7) Social Studies in New Zealand
- 8) Civics in Australia
- 9) Citizenship education in Nigeria as well.



#### **DISCUSSION**

Citizenship education often stresses on the responsibility that people have to the country as a whole in terms of social, political, religious, and legal problems. Studying citizenship gives students the skills, information, and understanding they need to participate fully as responsible, engaged citizens in a democratic society. Voting, politics, and the parliament are all topics that are taught to kids. Citizenship education is a sort of education that promotes positive values, attitudes, abilities, and knowledge in people so they can actively participate in their communities' affairs or adjust to their new duties as responsible citizens. They also study the economy, personal finance, justice, the law, sustainability, and media literacy.

Children in Nigeria are taught about the numerous national institutions as well as the notion that the law governs social interactions and interpersonal relationships as part of their citizenship education. Additionally, it requires imparting to the child the importance of actively participating in national politics.

Citizenship or Civics Education is construed to encompass the preparation of young people for their roles and responsibilities as citizens and, in particular, the role of education (through schooling, teaching, and learning) in that preparatory process, says Barnes (2018) in his definition of the subject.

According to Anisah & Marzuki (2019), citizenship education is the process of teaching kids from an early age how to think critically and participate in societal decisions. In this context, the term "society" refers to a nation with a defined territory that is regarded as a state.

Teaching citizenship education aims to develop citizens so they can uphold the constitution's principles and become better citizens. The fact that Citizenship Education is an educational program, the topic of political democracy or citizens' roles in various facets of national and state life, as well as other factors that contribute positively to the development of these roles, both derived from the family, school, and community, are some of its distinguishing features.

#### A BRIEF HISTORY OF CITIZENSHIP EDUCATION

From a historical and epistemological standpoint, it can be said that the United States of America (USA) was the state that pioneered academic and curricular changes that contributed to shaping the concept and paradigm of "Citizenship Education." In the middle of the 1880s in the USA, "Civics" was first presented as a curriculum at a school that studied government-related material. Early in the 20th century, the term "civics" was joined by the term "citizenship education," which is used to refer to a particular kind of "character education" or educational character as well as "teaching the personal ethics and virtues" or education, ethics, and virtues. (Allen, 1960). Early in the 1900s, the phrase "Civic Education" was first used; it is now frequently used in place of the more traditional term "Citizenship Education."



#### COMPETENCE IN CITIZENSHIP EDUCATION

In order for each citizen to engage responsibly in a democratic society, a set of knowledge, abilities, and attitudes known as the citizenship competencies must be present. These competencies cover the cognitive, emotional, and psychomotor domains. Anisah & Marzuki (2019) identified the basic components of civic competence as the purpose of Citizenship Education. Civic competence is the combination of knowledge, skills, attitudes, and values that empowers citizens to carry out duties like active civic participation, which includes communication, problem-solving, critical and creative reflection, decision-making, responsibility, respect for values, and other tasks. These comprise civic knowledge (citizenship knowledge), civic abilities (citizenship skills), and civic disposition (citizenship disposition). Citizens must own the three parts of citizenship education if they wish to become knowledgeable citizens with high moral standards who actively contribute to the growth of their country.

- i) Civic Knowledge: This is the body of knowledge that members of the public should be familiar with, especially when it comes to subjects that are important to citizenship. According to Kerr (2000), the five central questions that make up Citizenship Education can be used to symbolise civic knowledge. These are the five queries:
- i) What are civic life, politics, and the government?
- ii) What makes up the cornerstone of the state system?
- iii) How does the constitutionally created government respect the objectives, tenets, and ideals of the democratic state?
- iv) How does the state engage in international relations and other issues?
- v) In a democracy, what roles do citizens have?

These five inquiries must be made as part of citizenship education in each state to raise civic literacy. In addition to these, there are additional important aspects. Citizenship, political institutions, a model of the political system, state institutions, democracy, and globalization are all included in the political element. On the other hand, the law includes the rule of law, the legal system, sources of law, legal subjects, objects, events, and sanctions of law, as well as the legal system itself. Morals encompasses an awareness of values, norms, and moral; the relationship between values, norms, and moral; the historical context of moral teachings; societal norms; and the execution of the ethical precepts that serve as the cornerstone of the state.

ii) Civic Skills: Civic skills are the core capacities that apply to or are associated with a citizen, city, or citizenship. These include the skills required to participate in society as an accountable citizen. The National Standards for Civic and Government Education and The Civic Framework for the 1988 National Assessment of Educational Progress (NAEP) reaffirmed that critical thinking skills include recognizing, classifying, explaining, and generalizing. Critical thinking skills are also required for the application and evaluation of science. Citizens must first and foremost possess the capacity for critical thought (thinking skills), which includes the



capacity for conceptualization, interpretation, analysis, generalization, and the application and evaluation of science. Third, academic study skills, such as the capacity to arrange, organize, and gather information through reading, listening, and observation; the capacity to communicate both orally and in writing; the capacity to develop hypotheses in the context of scientific issues; and the capacity to use the evidence to test the hypothesis and make generalizations. The second skill is the ability to develop social (social science inquiry skills). The group's ability (group skills) to function well as both leaders and followers in resolving group issues, participate in the research project group, contribute to the development of the group's purpose, use power fairly and effectively in the group's circumstances, communicate effectively within the group, and assist in resolving conflicts within the group are the fourth and final factors.

- iii) Civic Dispositions: Civic dispositions are among the most important elements of citizenship education. The main objective of the civic disposition is to foster good citizenship, which includes both private virtues like moral responsibility, self-control, and respect for each person's inherent dignity, as well as public virtues like civic responsibility, decency, adhering to the law, critical thinking, and a readiness to listen, negotiate, and compromise (Kerr, 2000). This is a part of the entire societal service provided by a citizen. The National Standards for Civics and Government identified civic dispositions that promote one's political effectiveness, the smooth operation of the political system, one's sense of self-worth and dignity, and the common good. For the sake of concision, the following private and public dispositions are listed:
- a) Becoming a self-sufficient member of society: This attitude entails accepting accountability for one's actions, abiding by the moral and legal obligations of citizenship in a democratic society, and adhering voluntarily to self-imposed standards of conduct rather than clamoring for the imposition of external controls.
- b) Taking up a citizen's financial, political, and personal tasks, which include taking care of oneself, providing for one's family, and raising and educating one's children. These acts also include paying taxes, voting, serving on juries, volunteering, and holding leadership positions that are suitable for one's talents.
- c) Respecting individual value and human dignity: Respecting others involves supporting the principle of majority rule while acknowledging the right of the minority to dissent. It also involves being attentive to others' rights and interests.
- d) Engaging in civic affairs intelligently and effectively: This quality comprises conducting a study before voting or speaking out in a public discussion, engaging in respectful dialogue, and taking the initiative when necessary. It also requires considering if and when one's duties as a citizen necessitate one to set aside one's personal interests and aspirations in favour of the larger good. Additionally, it requires choosing whether or not one is compelled to violate particular civic expectations as a consequence of one's commitments or constitutional principles.
- e) Supporting the robust operation of constitutional democracy: This strategy involves keeping abreast of current affairs, paying attention to them, learning about and taking into account constitutional values and principles, monitoring how well political leaders and governmental institutions uphold those values and principles, and acting appropriately when



called upon. If citizens possess this temperament, they are also more inclined to adopt peaceful, legal ways to modify laws they think are dumb or unfair.

# FOUR MAJOR DOMAINS OF CITIZENSHIP EDUCATION

The substance of citizenship education is divided into four primary categories, which are as follows:

# i) Democracy and democratic institutions

Democracy is a political system that is based on the principle of "power of the people," i.e., power that is held by, used by, and for the benefit of the people. The Greek word "democracy" is composed of the two words demos, which means "the people," and crate, which means "to rule" or "to govern." That suggests that the people are the ultimate sovereigns in a government. Democracy assures that the people will enact laws to protect their rights further and that they are the power source. In essence, it alludes to a system of administration in which the populace has the final say. In certain forms, democracy can be exercised directly by the populace, but in large societies, democracy is exercised indirectly through the use of people chosen by each society to function as its representatives. As Lechman (2009) noted, democracy is a concept with a broad definition and numerous complex elements.

Democracy is a method for selecting political leaders on a political level. The public may elect one of the candidates for political office. Lechman (2009) presented an overview of what democracy is in his opinion. According to him, democracy is a form of government that must have four key elements in order to function: the capacity to choose and replace the government through free and fair elections, active citizen involvement in politics and civic life, protection of all citizens' human rights; and the rule of law, which ensures that all citizens are treated equally under the law. For democracy to succeed, democratic institutions that teach and disseminate information are crucial. One of the institutions that played a crucial role in this circumstance was the institution of education, which served as a conduit between students and teachers to spread democracy through civic education.

# ii) Identity as a nation

Nationalism, citizenship, civic education, and nation and nationalism are all closely related to the concept of national identity. The term "identity" refers to the special qualities or identity associated with someone or something. In contrast, the word "nation" is the root of the word "national," which refers to a nation. The nation can be understood as a group of people who share similar physical characteristics, cultural attributes, religious beliefs, linguistic norms, or ideals. In order to carry out the goals of national identity, we must understand the parameters of national identity formation. The first psychological dimension is the one that derives from the perception of the proximity or bond that a group of people feel they share as a nation. Second, there are cultural dimensions, which are those aspects of a society that have been preserved over time. Fourth, the size of the territory relative to the region that became the nation's homeland and the location of everyone's principal residence. The next consideration is political, which has an impact on how the country's authorities decide who will continue to rule its citizens.



#### iii) Regional and international organizations

The phrase "international organizations" refers to a broad range of formal structures with both shared elements and distinctive characteristics that call for explanation. The term "international organizations" is occasionally used to refer to international corporations, bilateral organizations, multilateral organizations, and international non-governmental organizations (INGOs) (Dijkzeul et al., 2003). The International Organization is an intergovernmental body with the power to draft international agreements and is recognized as a subject of international law. Regional organizations are set up to promote democracy and human rights, defend the territorial integrity of member states, offer security, and forge economic ties through trade and cooperation for rapid development. Some regional organizations are founded with broader goals in mind, such as environmental protection or the preservation of cultural heritage. On the other hand, many regional organizations founded on security considerations have members that do not share borders with other members, making them geographically non-contiguous. Regional groups usually uphold regional contiguity based on economic, cultural, and environmental concerns.

# iv) Diversity and Social Cohesion

The level of relationships and camaraderie between social classes is known as social cohesion. Its two primary dimensions are relationships within the community and a sense of belonging to it. Social cohesion is a social process that aims to repair social gaps brought on by injustice and socioeconomic disparities in order to strengthen citizenship diversity. Social cohesiveness is a non-material phenomenon that can be observed in people's cognitions (Filonov, 2016).

Thus, it follows that while elements like employment, the rule of law, and equal opportunity for all citizens are important—possibly even more so than social cohesion—they do not, by themselves, represent indicators of social cohesion. Diversity is described as being distinct, different, of a different kind, or variety by Dimitrov & Boyadjieva (2009). When we talk about diversity, we are talking about a range of people from various racial, ethnic, socioeconomic, and cultural backgrounds, as well as with various lives, backgrounds, and interests. We can infer that diversity refers to the fact that there are numerous variations in a variety of societal domains.

In a nutshell, civic knowledge, civic skills, civic ideals, and civic involvement are the four main pillars of citizenship education. Civic knowledge is the knowledge of the rights, responsibilities, and institutions of a democratic society. A few civic skills required for participation in democratic and civic processes include critical thinking, effective communication, and problem-solving. Civic values are the beliefs, principles, and behaviors that preserve democratic norms, including respect for others' differences and legal compliance. Last but not least, civic engagement is actively taking part in democratic processes and contributing favorably to the neighborhood and society at large.



#### IMPORTANCE OF CITIZENSHIP EDUCATION

The fact that it encourages the development of soft skills like teamwork, communication, initiative, and social interaction is just one of many elements that make citizenship education important. Civic education helps citizens better understand, interact with, and critique democratic society, including politics, the media, civil society, the economy, and the law. Civic education prepares regular people with knowledge about democracy and the constitution and enables us to be informed, engaged citizens who can change the world. Citizens of democracies should learn civic education to become more engaged, knowledgeable, and capable of taking responsibility for themselves, their communities, and the political process. Additionally, it aids citizens in understanding their responsibilities to the nation and their local communities.

Citizenship education is essential to sustaining the state as a whole and accomplishing the state's civic objectives. It helps children develop a sense of agency and self-assurance so they may successfully deal with life transitions and challenges like bullying and prejudice. It gives children a say in issues affecting their communities, schools, and society as a whole. By equipping students with the abilities and knowledge required to express their rights and comprehend their obligations, learning citizenship education may benefit them.

# CITIZENSHIP EDUCATION NOW AVAILABLE IN SOME CHOSEN COUNTRIES

#### EDUCATION FOR CITIZENSHIP IN INDONESIA

In Indonesia, citizenship education is a subject that is obligatory from elementary school through college. Children are encouraged to develop a sense of nationalism and a commitment to the nation's moral principles through citizenship education. This matter is evolving into a yardstick for one's obligations and acquired rights as a citizen for the sake of one's honour and the honour of the nation. Promoting citizens' participation in the state's life in accordance with Pancasila and the UUD 1945 is the aim of citizenship education in Indonesia. It is a part of political education, and this role is the main topic of the readings. Based on personal experience, the author believes Indonesia has successfully implemented citizenship education. The 1945 constitution's protection and regulation of these subjects are demonstrated by the inclusion of citizenship education in the curriculum.

# **Indonesian Citizenship Acquisition and Loss**

There may be a number of ways to become an Indonesian citizen, depending on the situation. In theory, naturalisation is the only way to become an Indonesian citizen unless you are an adopted kid or a foreigner who has significantly benefited the nation (Hussein & Intan, 2020).

# Getting an Indonesian passport

Hussein & Intan (2020) state that Indonesian citizenship can be obtained by adoption, birth, marriage, or naturalization.



# **Adoption**

Adopted children under the age of five who have at least one Indonesian parent are able to apply for nationality there. Indonesian children adopted by foreign parents are likewise regarded as Indonesian until they reach adulthood and declare a nationality (Jerónimo, 2017).

#### **Birth**

According to Honohan & Rougier (2018), the following people can be deemed Indonesians by birth:

- i) Individuals with one Indonesian parent who are born on Indonesian soil or abroad;
- ii) Foundlings with unidentified parents who were born in Indonesia;
- iii) Children born in the territory to stateless parents; or
- iv) Individuals who would have acquired Indonesian citizenship but for the passing of a parent.

# **Matrimony**

By submitting a formal declaration to the authorities, foreign spouses of Indonesian citizens may choose to become citizens of Indonesia. The spouse must meet the requirements of five continuous or 10 cumulative years of residence in Indonesia or obtain a permit to remain in the country while holding dual citizenship (Guerry & Rundell, 2016).

# **Through Naturalization**

In Indonesia, there are two methods of naturalization. For regular naturalization, an applicant must be of legal age and capacity. The Minister of Law and Human Rights must receive the application fee and supporting documents. A five-year residency or ten years of intermittent cumulative residence must be established before applying. The applicant must demonstrate that they have no prior convictions that resulted in a jail sentence of one year or more, that they are in excellent bodily and mental health, and that they are financially independent. Additionally, they must vouch for their ability to communicate in Indonesian and demonstrate a working understanding of Indonesian civics. Applications are considered at the President of Indonesia's discretion, and if accepted, the applicant must renounce all prior nationalities (Harijanti, 2017).

The other category of naturalization is for extraordinary merit, which includes accomplishments that have improved the country through science, sport, technology, the environment, or culture. For their exceptional contributions, public or private groups may suggest a candidate to the Minister of Law and Human Rights. Parliament must review the application, and the Indonesian President has the final say.

# Losing one's citizenship in Indonesia

If an Indonesian has attained legal majority, has total capacity, and would not become stateless by such renunciation, they may voluntarily resign their citizenship. Generally speaking, individuals who have lost their citizenship can regain it by requesting ministerial approval or applying for naturalization. Denaturalization is an option for:

i) Voluntarily gaining a different citizenship or swearing allegiance to a different nation;



- ii) Refusing to renounce a different nationality when given the chance to do so;
- iii) Participating in elections in a different nation;
- iv) Owning a passport or another official document of nationality issued by a foreign country;
- v) Setting up a residency overseas for five or more years in a row without working for the Indonesian government or failing to notify the appropriate authorities every five years that you want to keep your Indonesian nationality or
- vi) Working in a foreign military or government position without receiving Indonesian government authorization. The Indonesian government proclaimed in 2020 that anyone who joined the terrorist organization Islamic State of Iraq and the Levant (ISIL) would immediately forfeit their Indonesian citizenship and become a stateless person. ISIL fighters' nationalities were revoked along with a ban on repatriating captured combatants, except for minors under eighteen who lived abroad with the fighters' families.

# **Dual nationality**

In Indonesia, having two nationalities is often not permitted. However, in 2006, the nationality law was changed to permit children to maintain dual citizenship until they reach the age of legal majority, which is seventeen, as a result of campaigning by women's rights organisations. If they are still under 18, they must get an affidavit for a Limited Indonesian Dual Nationality Passport (Indonesian: Paspor Warga Negara Indonesia Ganda Terbatas) in order to maintain their dual status. They are required to select a single nationality after they turn 21 (Boll, 2007; Afrisia, 2016).

#### CITIZENSHIP EDUCATION IN UNITED KINGDOM

In the UK, citizenship education was not explicitly incorporated into the curriculum for students between the ages of 11 and 16 until 2002. However, since 2002, the content and context of civic education have significantly changed. Before this, no established national policy was established to guide instruction in this area.

This policy reform aimed to increase political literacy and responsible, active participation in the political and civic spheres at the local, national, European, and international levels. The United Kingdom's civic education curriculum was modified to achieve this.

# **UK Citizenship: Gaining and Losing Citizenship**

Residents of the British Islands (the UK, the Isle of Man, and the Channel Islands) are entitled to British nationality. Prior to 1983, all infants born in the British Islands (the United Kingdom and Crown Dependencies) had British citizenship regardless of the nationality of their parents. People born after that date only receive citizenship at birth if at least one parent is a British citizen or is recognized as having settled status in the UK. A child born abroad is assumed to be a British citizen by descent, subject to some limitations, if either parent is a citizen other than by descent. Adopted children are treated equally to all other children born to the adoptive parents at the time of adoption. Children born overseas to British service members or civilians employed by the Crown are treated the same as children born in the UK.



Children born to an Irish resident in the UK are always British citizens. Since 1983, a child's status has been determined by the parents' citizenship or status as permanent residents in the UK at the time of the child's birth. When they arrive in the UK, Irish people are regarded as having settled status (Bagnall & Sherratt, 2021).

The children born over the various regulation periods have been impacted by the major changes in the status of other European Union (EU), European Economic Area (EEA), and Swiss nationals who have settled status over time. Before October 2, 2000, those who lived in the EU or EEA were automatically recognised as having made their home in the UK. Between that date and April 29, 2006, citizens of the EU/EEA were required to submit a permanent residency application. Swiss nationals were subject to the same regulations on June 1, 2002. From 30 April 2006 until 30 June 2021, individuals from the EU, EEA, and Switzerland who have been in the UK for at least five years automatically receive permanent resident status. On July 1, 2021, these nationals' status as lawful permanent residents ended. Now, they must continue to be established under the EU Settlement Scheme or find another option.

Foreign people are able to naturalize as British citizens if they have lived in the UK for more than five years and have had ILR for at least a year. The residency requirement is lowered to three years if the applicant is married to a British citizen and becomes instantly eligible for naturalization after obtaining ILR or an equivalent. Candidates must pass the Life in the UK exam and demonstrate English, Welsh, or Scottish Gaelic language proficiency.

A person is a British national if they are a British citizen, a citizen of the British Overseas Territories (BOTC), a citizen of the British Overseas (BOC), a British National (Overseas) (BN(O)), a citizen of the British Subjects, or a citizen of the British Protected Persons. Among these categories, only British citizenship grants a person an automatic right to reside in the UK. British Overseas Territories are areas where the UK controls outside the British Islands. Almost all BOTCs have also held British citizenship since 2002, with the exception of those associated with Akrotiri and Dhekelia (Bagnall & Sherratt, 2021).

The final four groups are residual nationality classes, which are often impossible to attain. People who have ties to former British colonies but do not reside in the UK or any other overseas country are known as BOCs. BN(O)s were Hong Kong residents who voluntarily applied for this status before the area was returned to China in 1997. Those who have ties to either what is now the Republic of Ireland or what was once British India until 1949 are known as British subjects. These include the British Empire's protectorates, protected states, mandated territories, and Indian princely states—all of which were never formally acknowledged as Crown territory (McMillan, 2017).

#### The loss of British citizenship

After the Nationality, Immigration, and Asylum Act of 2002 went into effect, British citizens could no longer be stripped of their citizenship unless the Secretary of State determined they were responsible for serious offences against the vital interests of the United Kingdom or a foreign territory (McMillan, 2017). This was made more expansive by the Immigration, Asylum and Nationality Act of 2006: people who are British citizens and also hold a second nationality may have their British citizenship revoked if the Secretary of State decides that "deprivation is conducive to the public good" or if their nationality was acquired fraudulently,



falsely represented, or by concealing a material fact (Immigration Minister Mark Harper, 2014).

Any type of British citizenship may be renounced by submitting a declaration to the Home Secretary, provided the declarant already holds another nationality or intends to do so.[93] Former British citizens or BOTCs may then apply for the reinstatement of nationality. A person may only register as a BOTC or British citizen once if they previously gave up their British citizenship in order to keep or acquire another nationality. A person who initially renounced their British nationality for a purpose unrelated to attaining or maintaining an alternative nationality would require the Home Secretary's discretionary permission (McMillan, 2017) for any subsequent renunciation and application for restoration.

# **Loss of British Citizenship Automatic**

When acquiring any other type of nationality, British subjects (apart from those who are British subjects because of a relationship to the Republic of Ireland) and British-protected persons lose their British nationality.

- i) These regulations do not cover British citizens.
- ii) British Overseas Territories Citizens (BOTCs) who acquire a different nationality may not forfeit their BOTC status. However, they may be in danger of losing their status as citizens under the immigration laws of their home country. Such individuals are urged to contact the territory's governor for information (Bagnall & Sherratt, 2021).
- iii) British Overseas Citizens (BOCs) who acquire new citizenship do not lose their BOC status; nonetheless, they are no longer eligible to register as British citizens under the pretext of having no other nationality (Nugent, 2017).

# 7CITIZENSHIP EDUCATION IN THE UNITED STATES OF AMERICA

Teachers in the United States of America added information on community civics, civics, and vocational economic civics to teach in schools after taking a political science course in the form of political democracy. In order to develop learners or citizens in a democratic society with the aim of becoming an American citizen, citizenship education then moves on to community civic movement and movement civic education (Anisah & Marzuki, 2019).

#### The acquisition of American citizenship

Citizenship in the United States grants the ability to obtain an American passport. A passport is frequently used as both a form of identification and citizenship documentation.

Due to their status as citizens, Americans have various privileges, obligations, protections, and rights within the nation. The freedom of expression, the right to due process, the right to vote (though not everyone has this right in all federal elections, such as those held in Puerto Rico), the right to live and work in the US, and the right to receive federal assistance all have their roots in it and are supported by the US Constitution and laws.



Barnes (2018) recognized naturalization and birthright citizenship as the two main pathways to American citizenship.

Persons born abroad to parents who are United States citizens are also deemed citizens under the birthright citizenship doctrine, provided certain additional conditions are satisfied.

**Citizenship by Naturalization** is the procedure by which a qualified legal immigrant applies for and is granted citizenship. The citizenship clause of the Fourteenth Amendment to the Constitution, which reads as follows, specifies the first of these two routes to citizenship:

All people who are subject to the jurisdiction of the United States and who were born or naturalised there are citizens of both the nation and the state in which they currently reside.

The second is covered by American law. Congress is clearly given the authority to create a "uniform rule of naturalisation" in Article One of the Constitution.

Americans can renounce their citizenship by going through a formal process at a US consulate.

On the other hand, state citizenship refers to a person's connection to a particular state and frequently only affects domestic matters. On the other hand, national citizenship designates affiliation with the nation as a whole. Three factors, including tax options, eligibility for certain state benefits, such as higher education, and eligibility for state political posts, like U.S. senator, may be impacted by citizenship: Since it was popularly regarded to have a claim to the citizens' allegiance in the seceding Southern states during the American Civil War, state citizenship gained much more significance (Barnes, 2018).

# **Dual nationality**

People with dual citizenship are able to travel using two passports. Dual citizenship is acceptable in both Nicaragua and the United States. A person with dual citizenship is one who is regarded as a citizen by two or more countries. A citizen of the United States can hold dual citizenship; this can be done in a number of ways, including by being born in the country with parents who are citizens of different nations (or, in some cases, by grandparents), by being born abroad with parents who are citizens of the United States, or by having parents who are citizens of different nations. During the naturalization ceremony, everyone wishing to become a United States citizen must renounce any prior "allegiance" to any other nation (Peter, 2007).

Multiple citizenship is permitted under American law. When a foreign national becomes a citizen of the United States, they can keep their former citizenship, but they must renounce their allegiance to the foreign nation. If the new country's rules let it, a citizen of the United States keeps that citizenship after becoming a citizen of that nation (Spiro, 2017).

# Loss of Citizenship in the United States of America

United States citizens have the choice to renounce their citizenship, which includes giving up any remaining rights and obligations as well as the right to reside there. The term "relinquishment", as used in 8 U.S.C. 1481(a), refers to all seven potential expatriating acts (means of relinquishing citizenship). Two of these actions are referred to by the word "renunciation": taking an oath of renunciation in front of a foreign diplomatic or consular official of the United States or in front of a person inside the nation whom the attorney general has selected while the nation is at war. Spiro (2017) asserts that while U.S. tax law has treated



such individuals as U.S. citizens since 2004 and treats them as such until they notify the State Department and apply for a Certificate of Loss of Nationality (CLN), U.S. nationality law treats people who perform potentially expatriating acts with the intent to renounce U.S. citizenship as ceasing to be U.S. citizens from the moment of the act.

Renunciation necessitates an oath to be taken before a State Department official, necessitating physical presence at an embassy or consulate; however, applicants for CLNs based on other potentially expatriating acts are also required to appear in person for an interview. An official from the State Department evaluates whether the applicant acted voluntarily, meant to relinquish all citizenship rights, and understood the repercussions of their decision during the interview. The State Department will allow Americans to become stateless provided they are aware of the repercussions and strongly advises those planning to renounce their citizenship to obtain another citizenship (Spiro, 2017). The process entails an administrative cost of US\$2,350. Additionally, some people who give up their citizenship are subject to an expatriation tax; however, this tax is not legally required to be paid before giving up citizenship; instead, it is due on the regular tax filing deadline of the year after giving up citizenship. Interviewees are not asked for any tax-related information by State Department representatives, who advise them to send any tax-related inquiries to the IRS.

# CITIZENSHIP EDUCATION IN NEW ZEALAND

Civics is taught through social studies, particularly in New Zealand. This subject has never been taught as a standalone subject in the history of our country's educational system. Through the ideals to be upheld, the attributes to be cultivated, and the material to be studied in classes like History and Social Studies, citizenship concepts have been included in the curriculum's overarching objectives. Ideas of what it meant to be a New Zealand citizen have changed to reflect the social and political events as the country's identity developed from that of a British colony through independence to that of a bi-cultural nation with a more global outlook. Social studies, moral education, history, and geography classes initially covered the fundamentals of citizenship. Although some countries, such as the United Kingdom, have shifted to an explicit Citizenship Education program, New Zealand currently teaches citizenship utilizing an integrated curriculum approach supported by participatory pedagogical methodologies.

# Citizenship in New Zealand: Acquiring and Losing Citizenship

The same citizenship regulations apply to all of New Zealand's territory, including the Cook Islands, Niue, Tokelau, and the Ross Dependency. The airspace, internal waterways, registered ships, and aircraft of New Zealand are all regarded as belonging to the Realm for the purposes of nationality.

#### **Acquiring New Zealand citizenship**

New Zealand citizenship can be obtained through birth, ancestry, or adoption.

# **Nationality by Birth**

Anyone born in the Realm before 2006 was immediately granted citizenship, regardless of their parent's nationality. After that year, the child born in the Realm immediately receives New



Zealand citizenship if at least one parent is a citizen of New Zealand or has another legal right to stay in New Zealand permanently (McMillan & Hood, 2016).

# Citizenship by Adoption or Descent

If either parent is a citizen of New Zealand other than through descent, any children born outside of New Zealand are citizens by descent. At the time of adoption, adopted children are treated just like any other kid born to adoptive parents (McMillan & Hood, 2016).

# **Obtaining New Zealand Citizenship voluntarily**

Foreign nationals above the age of 16 may petition for citizenship in New Zealand after residing in the Realm for more than five years and possessing an indefinite visa. According to McMillan (2015), this usually refers to having a permanent residence in New Zealand, where Australian nationals and permanent residents also have an unlimited right to abode. Permanent residents of the Cook Islands, Niue, and Tokelau are likewise subject to this requirement. Candidates must demonstrate English language proficiency and be physically present in the country for at least 240 days each of the five years of the five-year term, or at least 1,350 days total. In rare circumstances, the physical presence requirement may be reduced to 450 days during a 20-month period. Candidates who accompany New Zealand citizen spouses serving overseas on behalf of the Crown are given the same consideration as candidates who are physically present in New Zealand at the time of their service. At citizenship ceremonies that typically take place three to five months following approval, successful applicants who are 14 years of age and older must take an oath or affirmation of citizenship in which they swear allegiance to the New Zealand monarch (Bloom, 2011).

The several citizenships that are available in New Zealand cannot be distinguished or ranked in any meaningful way. The only significant drawback is that descendants of citizens cannot convey citizenship to their offspring who were born overseas (McMillan, 2015). After completing the five-year residency and physical presence requirements, these people may petition to become citizens by grant. If not, they can request that the Minister of Internal Affairs award citizenship to their children who were born abroad. Through the 2010s, citizenship was granted to 28,000 persons annually on average. According to the 2018 census, 1.27 million of New Zealanders who typically dwell there were foreign-born.

Samoan nationals can apply for citizenship by grant without meeting any residency requirements if they arrive in New Zealand after September 14, 1982, and have permission to stay there indefinitely. Samoans who were already New Zealand residents on that date were automatically given citizenship. When Tokelauan mothers seeking medical attention in Samoa give birth to New Zealand citizens at birth, their care is provided in the same manner as if the mothers had been Tokelauans who had been Tokelau citizens at birth (Bloom, 2011).

#### Loss of New Zealand citizenship

The declarant may resign their New Zealand citizenship if they already have another citizenship by submitting a declaration of renunciation. Renunciation may be rejected if the petitioner is still residing in New Zealand or if the country is at war with another country. Citizenship can be involuntarily revoked from someone who got it fraudulently or who held another citizenship but purposefully worked against the country's interests (Sawyer, 2013).



#### CITIZENSHIP EDUCATION IN RUSSIAN

As the Citizenship Education system in our country develops the features of the national movement and clarifies the challenges facing civil society, it will be required to update the application of national civil law. The practice of social mass will require a program of the state and civil comprehensiveness in order to combat crime and remove illicit activity in the production and management structures independent of ownership. As we continue with the sociocultural and socio-pedagogical experiments designed to learn from a pattern thought civilians in both personal and social concepts, we get closer to understanding the essence of the change of the mechanism of innovative and innovation development of their optimal in the federal government and the regional level (Filonov, 2016).

# Russian citizenship: obtaining it and losing it

Anyone born in Russia immediately receives Russian citizenship if at least one of their parents is a citizen. People born in the country to two foreign parents are only given Russian citizenship by birth if they cannot obtain either parent's citizenship. Russian citizenship is only conferred to children with one Russian parent born abroad if they would otherwise be stateless. Russian citizenship can be inherited by children born to two Russian parents overseas. Children who have been abandoned are presumed to be Russian citizens by birth if their parents cannot be found within six months (Shevel, 2012).

After staying in the nation with a valid residency visa for more than five years, foreigners may be admitted as Russian citizens. People without permits who moved to Russia permanently before July 1, 2002, are treated as if they have had a permit since the day they registered their address. Candidates must be able to speak Russian well and have a reliable source of income (Zevelev, 2021). For those who have been given asylum or refugee status or who have made remarkable contributions to science, technology, or culture, the residence requirement is reduced to one year. Citizens of other post-Soviet nations who have spent at least three years in the Russian Armed Forces may likewise be exempt from it. Additionally, any foreigner may be granted citizenship directly by the Russian president at his or her discretion.

Certain categories of foreign nationals and stateless people are eligible for a facilitated citizenship acquisition process in Russia without meeting residency requirements. These people include those with at least one Russian parent who resides in Russia, former Soviet citizens who have lived in a post-Soviet state permanently but have not obtained citizenship there, and former Soviet citizens who have attended Russian secondary schools or universities since July 1, 2002. If a foreigner or stateless person residing in Russia meets the following requirements, they may also be eligible for this streamlined process: they were born as former Soviet citizens in the Russian Soviet Federative Socialist Republic; they were married to a Russian citizen for at least three years; they had an adult child who was a Russian citizen; they had a Russian citizen child, but their Russian spouse was missing, deceased, or otherwise unable to exercise parental rights; or they w

# Russian citizenship is lost

Renunciation of Russian citizenship necessitates a formal declaration of renunciation. Parents of Russian citizens are allowed to relinquish their rights on behalf of their children. In circumstances where the Russian Federation cedes territory to a foreign country, Russians



residing in the affected territory can maintain their Russian citizenship or adopt citizenship of the new ruling state (Pirker & Entin, 2020).

# **Russian Citizenship through Naturalization**

Naturalization is a frequent method of obtaining Russian citizenship. Candidates must show proof of a current residency permit and that they spend at most three months annually outside of Russia. Some of the formalities are listed below:

- i) Agree to uphold the Russian Constitution.
- ii) Provide documentation demonstrating a minimum 5-year residence in Russia.
- iii) Give financial details and demonstrate that they have the resources to sustain their family.
- iv) Possess a working understanding of the Russian language.
- v) To renounce one's nationality of birth unless Russia and a certain state have reached an agreement in this regard.

# Russian Citizenship by Marriage

If a person has been married to a Russian citizen for more than three years, they may apply for Russian citizenship. In some cases, former Russian citizens who had previously renounced their Russian nationality choose to do so. They had to live in Russia for three years before they could petition for citizenship (Salenko, 2012).

# Russian Citizenship by Birth

If their parents were born in Russia, individuals can obtain Russian nationality. Even if one was born elsewhere but their parents were not, it is still feasible to petition for Russian citizenship by birth. Russian nationality can be obtained with the birth of just one parent there. Even if the process is rather simple, it is advisable to work with a Russian lawyer experienced in immigration law to ensure that the application will not be turned down (Molodikova, 2017).

#### Russian dual citizenship

The Russian Federation Constitution, namely Articles 62 and 6, permits Russian dual citizenship. However, there are also extremely precise requirements in this circumstance. Russian dual citizenship is only allowed when Russia and another country have reached an agreement—currently, only with Tajikistan and Turkmenistan. They must renounce their previous citizenship if they want to obtain Russian citizenship.

Russian citizens, however, are exempt from this need if they obtain citizenship in another country. However, notice must be given to the Russian General Directorate of Migratory Affairs (Zevelev, 2021).

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#### CITIZENSHIP EDUCATION IN NIGERIA

The ethnic nationalities that make up Nigeria each have their cultural preferences and values. There are about 250 distinct ethnic groups in Nigeria. The concept of indigenization was more influential than citizenship. The result of the 1914 merger of the previous Northern and Southern protectorates—and even up until Nigeria's post-independence—was the formation of fundamental cleavages surrounding ethnic causes and ambitions. Events in the past have had a big influence on nationalism, achieving true nationhood, and citizenship. For example, a Yoruba man would likely put his allegiance to the Yoruba cause over national concerns. A similar mentality can be seen in other ethnic groups. Many researchers have suggested the ideal focus point of citizenship education in Nigeria. As a result, the concept of citizenship is fuzzy, changing, and imagined rather than actual. Soon after independence on October 1st, 1960, there was considerable concern over the quality of curriculum content in relation to the beneficiaries. The early school curriculum was significantly influenced by the colonial ruler, Britain, and was primarily designed with Western ambitions in mind. In Nigeria, it was common for a child to be very ignorant of what was happening in his or her surrounding area while being well-versed in events happening elsewhere. This is partially a result of the significant British impact on the educational system in Nigeria (Fafunwa, 2018).

Agi (1999) maintains that citizenship education should emphasize nationalism rather than ethnocentrism and individualistic tendencies, arguing that it should not "define nationality in terms of ethnic, religious, and cultural identity." According to Agi (1999), citizenship education has the potential to raise citizens' awareness of the importance of reducing divisive animosity and fostering material ties that bring people together, as well as fostering the development of a sense of community among the ethnic nationalism that comprise a state.

# Nigerian Citizenship: Gaining and Losing Citizenship

The Federal Republic of Nigeria's 1999 modified Constitution (the "CFRN" or "Constitution") lists three ways to become a citizen of Nigeria: birth, registration, and naturalization. In order to be eligible for Nigerian citizenship through any of these routes, applicants must check off a number of boxes in the Constitution. However, the procedure and documentation requirements are further detailed in the Citizenship Requirements Handbook, published by the Federal Ministry of Interior's Citizenship and Business Department.

According to section 28 (2) of the Constitution, only those who are citizens of another country by birth are allowed to become citizens of Nigeria by registration or naturalization. The certificate of registration or naturalization will not be granted to someone not born in another country if they have not renounced their citizenship or nationality within five months of the registration or grant of the certificate of naturalization (Manby & Momoh, 2020).

The three ways to become a citizen of Nigeria are covered below:

# Citizenship by birth

Typically, foundlings or orphans whose parents are unknown remain stateless in Nigeria because there are no mechanisms for acquiring citizenship by jus soli, or by birth in the territory (Fafunwa, 2018). Individuals who qualify for citizenship by birth include:

• People born abroad whose parents are citizens of Nigeria; or



• People born in Nigeria who had at least one grandfather who was a native of that country or who belonged to one before it gained independence.

The people who fit this description for citizenship eligibility are described in full in Section 25 of the Nigerian Constitution. These individuals fit this category and are eligible for citizenship:

- i) People who were born in Nigeria before October 1, 1960, and who have any ancestors who are either current or former members of an indigenous Nigerian group. The word "indigenous" to Nigeria, which denotes that an individual must have blood ties to Nigeria, is highlighted in this subsection. However, a person must have had one of his parents or grandparents born in Nigeria to be a citizen of this country by birth.
- ii) People born in Nigerian territory after October 1, 1960, whose parents or any of their grandparents are Nigerian citizens; and
- iii) People born outside of Nigeria but whose parents are both citizens of that country. Citizenship through birth through descent is the subject of this subsection.

It is clear from the aforementioned, especially the third category, that one need not have been born in Nigeria in order to be a citizen of that country. Though ones parents or grandparents are citizens of Nigeria, they may seek citizenship by birth there even though they were not born there.

# Registration as a Citizen

Section 26 of the Nigerian Constitution applies to this type of citizenship. Registration as a citizen is only applicable to the following:

- 1. Women who are wed to Nigerian nationals. Due to the patriarchal nature of the country, a man who marries a woman from Nigeria does not have the same rights under the Constitution.
- 2.People who are of legal age and capacity who were born outside of Nigeria but whose grandparents are all Nigerian citizens

It is important to note that the phrase "grandparent(s)" is the critical phrase in the second condition. This distinguishes it from the third category of individuals qualified to become Nigerian citizens by birth—those born abroad but whose parents, but not grandparents, are residents of the nation. A person who meets the requirements of Section 28 (2) of the Constitution may be registered as a citizen of Nigeria if the President is satisfied that:

- a. He has a good moral character;
- b. He has made it plain that he intends to make Nigeria his home and
- c. He has taken the Oath of Allegiance provided in this Constitution's Seventh Schedule.

# Naturalization as Citizenship

Persons who have lived in Nigeria long enough to demonstrate their familiarity with the culture, traditions, and obligations of citizenship may be awarded naturalization. Applications are filed to the Interior Ministry, which then distributes the documentation to a number of state organizations, including the Immigration Service State Security Service, as well as the state



governor, the head of the local governing body, and the police. The application is subsequently forwarded to the Federal Executive Council for a recommendation if it is approved. The President of Nigeria makes the final determination regarding the application. Candidates must generally meet the requirements of excellent moral character and ability to advance the country. No provisions in Nigerian law allow adopted children to become citizens. The applicant must confirm a minimum of fifteen years of lawful residency. The wife of a Nigerian national who meets the other requirements for naturalization may also register without a residency requirement in addition to foreigners who match the criteria (Manby & Momoh, 2020).

The President will give a certificate of naturalization to those who meet the requirements of Section 27(2) of the Constitution. Such individuals must demonstrate to the President that:

- (a) He is a mature adult with full capacity;
- (b) He possesses good moral character;
- (c) He has made it known that he wants to call Nigeria his home;
- (d) He is considered to be acceptable by the neighborhood in which he intends to live permanently and has integrated into Nigerian culture in that region of the Federation, according to the Governor of the State where he currently resides or intends to do so;
- (e) He is a person who has contributed to Nigeria's development, growth, or well-being or is capable of doing so;
- (f) He has sworn the oath of allegiance required by this Constitution's Seventh Schedule; and
- (g) He has, within one year of the application date, either-
- Has lived continuously in Nigeria for fifteen years or
- Had a continuous residence in Nigeria for twelve months and a cumulative total of at least fifteen years of residence in Nigeria over the twenty years immediately prior to those twelve months.

#### **Special Immigrant Status (SIS)**

Male spouses of non-Nigerian Nigerian citizens are eligible for this. It is contingent upon five (5) years of continuous marriage and residence in Nigeria. The Nigerian Constitution's Chapter III, Section 32 governs this group.

The three stages of this process, according to Falola, Genova, and Heaton (2018), are as follows:

- a. Document submission to the Federal Ministry of Interior (FMI), Abuja, is the initial step.
- b. The issue and submission of an authentic report from the applicant's state of residency to Abuja will constitute the second stage (please note that the documents and procedures for this second stage differ from state to state), along with two further steps.



c. The FMI will grant the approval, and the Nigerian Immigration Service will issue the Combined Expatriate Residence Permit and Aliens Card (or "CERPAC") in conjunction with it.

# **Dual nationality**

The majority of Nigerians are allowed to hold dual citizenship. However, those who have already gone through naturalization in another country are not. Nigerians or people of other nationalities can naturalize without giving up their prior citizenship. Dual citizenship is not permissible for elected officials such as the president, governor, and legislators at the state and federal levels (Manby & Momoh, 2020).

#### Citizenship loss

Nigerian citizens are permitted to renounce their nationality as long as they follow the registration requirements. The government might disagree when there is a conflict. Citizens of origin cannot lose their citizenship. Falola, Genova, and Heaton (2018) claim that naturalized individuals risk losing their citizenship if they labour illegally for another nation, engage in serious misconduct, act disloyally, or commit crimes against the state or state security.

#### **CONCLUSION**

Education is one of the most crucial aspects of life. One of the main goals of education is to help students reach their full potential in terms of intelligence, skill, self-control, and religious convictions. We need a subject that helps students develop their character and individuality if we are going to meet the goals of education. The subject at hand is civics instruction. The term "citizenship education" refers to all programs that influence participants' attitudes, capacities, and actions as current or potential members of the community. Knowing educational philosophy requires knowing the purpose, goals, and methods of citizenship education because these ideas significantly impact many sectors, including education.

In order to achieve the program's goals of helping students become informed and moral citizens, students in citizenship education must understand a variety of topics and concepts. One of the most important subjects that are taught in almost every country on the planet is citizenship education. But the names of various nations may vary.

According to the author, citizenship education has generally been adopted worldwide. Despite the difficulties and obstacles involved, governments in several countries have made every effort to adopt citizenship education to benefit all.

Overall, the way citizenship education is implemented in various nations reflects the distinctive educational frameworks, cultural values, and goals for training individuals for social engagement.



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