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When does a nation-level analysis make sense? ESD and educational governance in Brazil, South Africa, and the USA

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International policy analysis tends to simplify the nation state, portraying countries as coherent units that can be described by one statistic or placed into one category. As scholars from Brazil, South Africa, and the USA, we find the nation-centric research perspective particularly challenging. In each of our home countries, the effective influence of the national government on education is quite limited, particularly in fringe and emerging areas of education such as Education for Sustainable Development (ESD) and Climate Change Education (CCE). This essay explores how nation-level comparisons are and are not useful for international research on ESD and CCE. We consider several layers of decentralized governance, but ultimately come to the conclusion that ESD governance in our respective countries is polycentric rather than decentralized. We discuss the implications of this idea for cross-national policy research on ESD and CCE.

Keywords: education for sustainable development; climate change; international comparisons; polycentric; governance; policy

1. Introduction

International policy analysis tends to simplify the nation state, portraying countries as coherent units that can be described by one statistic or placed into one category. This convenient illusion enables researchers to draw clear comparisons among countries, hiding the complexity within nations in order to provide a satellite-view picture of similarity and difference. At its best, this picture is useful and provocative, allowing researchers, policy-makers, and practitioners to confront inequity, acknowledge shared challenges, and even reconsider their previous conclusions about the situation ‘at home.’ For educational researchers working within a particular national context, however, it can be difficult or impossible to sustain the illusion of internal coherence. In many countries, education is profoundly shaped by local and regional factors, including demographic variation, uneven infrastructure, and a web of influential stakeholders, including state or provincial authorities that wield considerable power.

As scholars from Brazil, South Africa, and the USA, we find the nation-centric research perspective particularly challenging. In each of our home countries, the

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effective influence of the national government is quite limited. This is particularly true in fringe and emerging areas of education such as Education for Sustainable Development (ESD) and Climate Change Education (CCE). Local and non-governmental stakeholders exert a powerful influence on ESD and CCE, complementing and sometimes overshadowing the efforts of national authorities. In each country, a stable central government is balanced by local and regional autonomy, making it difficult to tell a single, unified story about the evolution of ESD and CCE. Yet, all three countries are home to important ESD work – work in which regional governments, practitioner networks and non-governmental organizations (NGOs) play important roles.

This essay emerged from the collaboration of American, Brazilian, and South African researchers on the 2009 report *Climate Change and Sustainable Development: The Response from Education*¹ produced by the International Alliance of Leading Education Institutes (IALEI 2009).² Our participation in that project, as authors and reviewers, convinced us that the complexity of our three nations was poorly captured in cross-national analysis. Of the ten nations represented in the IALEI report, South Africa, the USA, and Brazil share a marked decentralization of their education systems. Yet our conversations led also us to believe that formal decentralization was only the beginning of the story. In the pages that follow, we use our knowledge of ESD and CCE in our national contexts to explore how nation-level comparisons are and are not useful for international research on education – particularly, though not exclusively, in nations characterized by ‘decentralized’ educational governance. We begin with the idea of decentralization, usually defined as the absence of strong, national-level authority over policy and practice (Dubois and Fattore 2009). We consider how the absence of coherent policy, a long ‘chain of implementation,’ and resource or infrastructure shortages can all contribute to *de facto* decentralization. We then address the influence of non-governmental organizations in each country, leading us to the conclusion that educational governance can be polycentric rather than decentralized. In the final section, we discuss the implications of this idea for cross-national policy research on ESD and CCE.

1.1. Notes about method and context

Each section of this essay uses examples from Brazil, the USA, and South Africa to examine when and how a nation-level perspective can be useful for educational researchers. Most of our examples come from research we conducted for the IALEI report. The IALEI process was designed to produce a relatively comprehensive account of policy and the policy climate, supported by scholarly research (where such was available) and enriched by concrete examples of ESD and CCE practice. The nature of the IALEI collaboration, including data gathering and analysis procedures, is discussed in greater detail in the introduction to the review symposium (Feinstein et al. this issue). Because this essay draws on data from the IALEI collaboration, it may be useful for readers to know that data collection focused first on formal policy documents at the national level (such as laws, regulations, and publicly available strategic plans), second on relevant peer-reviewed research, and third on local or regional practice.

In this paper, as in the rest of the review symposium, terminology poses a challenge. The earlier essay by Blum et al., discusses some of the conceptual and political tensions that are embedded in the use of phrases such as ‘environmental

education,' 'climate change education,' and, above all, 'education for sustainable development' (Blum et al. this issue). Our position is that terminological debates may be intensely relevant within countries, but are difficult to generalize across countries. This is in part because phrases take on different meanings when translated into different languages. It is also because the same phrase (e.g. Environmental Education) in the same language (e.g. English) means different things to the citizens of different countries (Lotz-Sisitka 2004). In this essay, we use the phrase 'education for sustainable development,' and its abbreviation ESD, as generic terms, encompassing ESD and EE, as well as variants such as Education for Sustainability. We do not do this out of any principled commitment to this phrase, but rather because it was the common term in the IALEI process that prompted this review symposium.

Our joint focus on ESD and CCE is inherited from the 2009 IALEI project, which was designed to inform the international climate policy discussion that took place in Copenhagen in 2009 (IALEI 2009). Although ESD and CCE are distinct fields, they are unquestionably connected: ESD is often evoked in discussions about climate change, and climate change is usually seen as one great challenge for practitioners of ESD. By discussing them in the same report, the leaders of the IALEI project hoped to draw attention to the ways in which the two educational discourses could inform each other. Our goal is slightly different. ESD has a longer history than CCE, and most of our discussion focuses on ESD governance. Indeed, our capacity to address CCE was limited by the relative lack of CCE policy and research at the time of writing. On the plus side, the nascent status of CCE provides an opportunity to extend our conclusions about educational governance. In the final section of this essay, we use our analysis of ESD governance to make predictions about how CCE might evolve under the same complex conditions. These predictions form the basis for future studies about CCE, ESD, and educational governance.

2. Governance and decentralization

Much of our analysis is rooted in the idea of governance. Following Elizabeth Bomberg, we define governance as

established patterns of rules and norms steering a polity in a stipulated direction. It implies the incorporation of principles, practices and mechanisms which enable a community to be governed even without a government or ruler. It may well include declarations, laws and policies mandated by government or from 'the centre', but it is much broader, including soft law, non-regulatory tools and policy learning. (Bomberg 2009, 23)

This definition highlights many of the factors that shape education, and suggests a dynamic balance of forces rather than a rigid hierarchy.

In practice, educational governance in countries such as South Africa, Brazil, and the USA is usually described as *decentralized* (Dubois and Fattore 2009). Researchers and policy-makers use the word 'decentralized' in inconsistent and contradictory ways, however (Weiler 1990; Meyer 2009), and the picture is further complicated by the fact that decentralization has different historical and cultural connotations in each of the three nations discussed here. In Brazil, for example, decentralization is associated with the transfer of authority over primary education

from state governments to local municipalities – a relatively recent administrative reform strategy intended to improve the overall quality of educational services (Leme, Paredes, and Portela 2009). In South Africa, decentralization is associated with the post-1996 formation of School Governing Bodies, representative councils from each public school with broad authority over many aspects of school administration (Naidoo 2005). In the USA, local and regional control over public schooling is a constitutional reality as old as public schooling itself, yet the federal government has exerted a steadily increasing influence over schools through sixty years of national policy initiatives (Kaestle and Smith 1982). In short, though all three countries can be thought of as ‘decentralized,’ the historical contexts and policy trajectories of the USA, South Africa, and Brazil are markedly different. A governance-oriented analysis begins, but does not end, with the idea of decentralization.

2.1. Legal mandate and the existence of coherent policies

At an abstract level, ‘centralization’ can be thought of a measure of within-nation variability. In an extremely centralized case, all decisions would be made by a single central authority with sweeping power to both set and implement policy. In an extremely decentralized case, all decisions would be made locally, with no central agenda or regulatory control over implementation. Many factors determine where a particular country falls on the continuum of educational decentralization. Most researchers look at formal national policies first, but such policies rely on something more foundational: whether or not a national government has the legal authority to regulate education. In the USA, education is delegated to the fifty separate states, and the national government has no constitutional authority to regulate practice (though this is a matter of debate, e.g. Kaestle and Smith 1982). In Brazil and South Africa, educational policies are developed at the national level but implemented by local or provincial governments.³

Of course, a national government can exercise its statutory authority in very different ways. A government may choose *not* to issue policies on ESD – or, if it does, to issue policies in a fragmented manner, dispersed among initiatives and programs where it is one among many competing priorities. This is exemplified by the Brazilian federal government, which explicitly supports the right of all citizens to ESD but does not clearly define its role in the curriculum. Sustainability-related topics are theoretically diffused throughout the different academic areas within the national curriculum, but because very little is specified, the scale and scope of implementation vary enormously (Jacobi et al. 2009).

The situation is similar in South Africa, though national policy is perhaps one degree clearer. South Africa’s National Curriculum Statement emphasizes the need for a healthy environment that takes account of the relationship between environment, society, and economy, and that deals with critical environmental issues. Although it does not use the language of ESD or CCE, sustainability and climate issues are integrated into the curriculum in various ways. For example, the Natural Sciences Curriculum includes a focus on biodiversity, the Technology Curriculum includes a focus on the environmental impacts of technology, and the Social Sciences curriculum includes a focus on environment and development issues (including climate change). These official documents represent an attempt to integrate ESD across the education and training system as originally envisaged by the first White Paper on Education and Training in South Africa (RSA 1995). Their impact is

limited, however, by the lack of a clearly articulated section devoted to ESD teaching and learning practices (Winter 2009). As a result, climate and sustainability issues are poorly integrated into the national system of education and training (RSA 2010a).

If the national governments of Brazil and South Africa regulate ESD somewhat less than might be expected based on their federal education policies, other national governments may do slightly more than their federal education policies require. In the USA, for example, federal agencies have played a small but consistent background role in the development of ESD, mostly through small grants and contracts that support research and practice. The lack of a constitutional mandate, however, has virtually guaranteed that these federal efforts are decentralized even within the national government. The last time a comprehensive review was undertaken, fourteen different agencies offered some degree of support or funding for ESD with almost no coordination among them (EPA 2002).

2.2. *Realities of resource and infrastructure*

Resource constraints and infrastructure problems can also turn an apparently centralized system into a *de facto* decentralized one. All policies, even those that are clearly stated and internally consistent, are weakened as they pass through the administrative levels that separate them from practice (Elmore 1979). These levels are sometimes called the chain of implementation; if one more or more links in the chain are weakened by limited resources or divergent understandings of a key policy goal, some aspect of the policy may be lost (e.g. Kettl 2000). One exceptionally clear example of this is the shortage of adequately prepared teachers. South Africa, Brazil, and the USA face very different educational challenges, but all three nations lack adequate teacher education in ESD-related fields. In South Africa, environmental education and training skills were identified as a critical area of short supply in a recent large-scale assessment of national capacity for sustainable development and climate change response (RSA 2010a,b). In fact, the authors of the assessment suggested that inadequate *educator capacity* might be the ultimate constraint on implementation of new ESD policies. In Brazil, too, inadequate teacher preparation appears to be a critical impediment to improving the number and quality of ESD initiatives (Brasil 2010). Most Brazilian teachers have a precariously inadequate background in the scientific concepts and knowledge that are integral to ESD and, in particular, CCE, limiting their capacity to participate in ESD initiatives and causing school-wide initiatives and new ESD curricula to stop at a superficial level, while the more powerful instances of ESD remain fragmented – isolated instances spread across the school and curriculum (Deboni 2007). In the USA, only a few teacher education programs offer mandatory ESD training for pre-service teachers, and those that do are often viewed as inadequate by their own participants (Heimlich et al. 2004; Nolet 2009).

Along the same lines, our analysis of research and policy documents revealed a lack of infrastructure for ESD assessment in all three nations. Assessment systems, at least systems that are capable of revealing where, when, and to what effect ESD is being implemented, are often built at the national level. Without such systems, it is difficult to evaluate the status of South African, Brazilian, or American ESD, much less affect a positive transformation. This is especially true in the assessment-driven policy climate that currently pervades all three countries – a climate in which

ESD is likely to be frozen out of the school system unless there are mechanisms in place to capture and report student performance (e.g. King and Zucker 2005).

2.3. *Decentralization in practice*

Although more could be said about the continuum of centralization, these examples should be sufficient to demonstrate that ‘decentralized’ is a large and diverse category. It is true that national governments have different degrees of legal authority over education, but it is equally important for researchers to examine if and how this authority is used to influence a particular area of practice. Thus, when ESD is included but poorly specified in the national curriculum, as it is in Brazil, or broken into pieces that are distributed among the disciplines, as it is in South Africa, there is little effective centralization. Furthermore, resource and infrastructural deficiencies can weaken the chain of implementation to such an extent that policies have no impact on local practice. This is true even in the USA, where the (comparatively) well-resourced apparatus for teacher education offers little support for the development and delivery of ESD. In short, the legal authority of a national government to regulate education merely sets an upper limit on centralization – it does not guarantee that educational governance will be centralized to the extent permitted by law.

3. Governance beyond government

When educational policy is not forthcoming from the national government, other authorities may step in. In Brazil, South Africa, and the USA, local and regional governments regulate the funding, staffing, and management of schools, thereby providing much of the guidance that national governments do not (e.g. Feinstein and Carlton 2012). The fact that local and regional governments are not equally interested in (or capable of) implementing ESD contributes to uneven policy implementation (e.g. Rabe 2004). Governance does not stop with government, however. NGOs and other, less formal civil service organizations provided critical support for ESD in all three of our respective countries. Rather than competing with regional or national government to influence ESD, NGOs often act in concert with federal and state initiatives, both providing and responding to new initiatives.

In the USA, NGOs have exerted a stronger influence on the slow-but-steady growth of ESD than either state or national regulatory agencies (Feinstein 2009). NGOs have created, refined, and implemented ESD curricula; disseminated academic standards; and facilitated the adoption of ESD practices in districts, schools, and classrooms. State and local agencies usually play a passive role, releasing school- and district-level leaders from administrative constraints or adopting innovative programs created by NGOs. The role of the federal (national) government is usually limited to support for NGOs, distributed through competitive grants or contracts. The interaction between these three entities is neatly illustrated by the evolution of academic standards for sustainability in the state of Vermont, which were shaped by the work of an educational NGO called Shelburne Farms. Shelburne Farms received funding from the federal government to develop curriculum materials and build local capacity for environmental education, but it also mobilized popular opinion and drafted new standards for consideration by the state. Thus,

federal support empowered an NGO to propose policy changes, which were then implemented by the state (*ibid.*).

In Brazil, the importance of civil society organizations is codified in law. The same statute that affirms the right of all Brazilians to ESD also emphasizes that the responsibility for providing ESD is shared across all levels of government and society, including educational institutions, NGOs, the media, and the private sector (Jacobi et al. 2009). Brazilian ESD has, as a central goal, the diffusion and internalization of sustainability values throughout society (Gadotti 2008). This may explain the strong programmatic emphasis on local participation, supported but not directed by the federal government. The multiplication of climate-related initiatives, in particular, has been driven by partnerships between government and NGOs.

To foster the diffusion of environmental knowledge and innovative practices, the Brazilian federal government has complemented its investment in local projects with repeated efforts to build regional and national networks. For example, the relatively recent Program for professional development of environmental educators (Brasil 2004, 2005) relies on a set of local networks called Education Collectives for Sustainable Territories that promote ESD competence formation. Education collectives meet on a regular basis, drawing together representatives from educational institutions, grassroots social movements, NGOs, and local government agencies to address environmental education and decision-making challenges in the social and environmental context of their particular region. In 1992, an over-arching network called REBEA (Brazilian Network for Environmental Education) was formed to connect the many smaller networks of EE practitioners. By 2007, REBEA linked together almost 50 local and regional networks.

In South Africa, it can be difficult to draw a clear line between government and NGOs. NGOs led most of the pre-1994 struggle that brought an end to the apartheid system and resulted in the country being governed, for the first time in its history, by a true majority. The new government drew its staff from within the ranks of the struggle movement, including many people from NGOs. Thus, the relationship between NGOs and government, post-1994, reflected unusually direct and intimate collaboration rather than tension or resistance. This pattern has recently begun to change, as critiques of current governance inefficiencies emerge from within society at large. Furthermore, facing a lack of ESD-capable educators, South African NGOs currently tend to follow educational models from the Global North,⁴ a trend that is particularly strong where CCE is concerned (Lotz-Sisitka 2009). Under these conditions, the continued involvement of NGOs in the policy planning process may ironically result in the dominance of widely available models from abroad rather than models sensitive to the contextual challenges of South Africa.

4. Polycentric systems and the historical coherence of nations

Two important lessons emerge from the discussion of NGOs in the USA, Brazil, and South Africa. First, it may be more accurate to describe ESD governance in these countries as polycentric rather than decentralized. According to Ostrom, Tiebout, and Warren,

'Polycentric' connotes many centers of decision making that are formally independent of each other. ... To the extent that they take each other into account in competitive relationships, enter into various contractual and cooperative undertakings or have

recourse to central mechanisms to resolve conflicts, the various political jurisdictions... may function in a coherent manner with consistent and predictable patterns of interacting behavior. To the extent that this is so, they may be said to function as a 'system.' (Ostrom, Tiebout, and Warren 1961, 831)

McGinnis contends that polycentric systems can form and function even when there is no central mechanism to resolve conflicts, and argues that they are likely to form whenever a problem arises that does not equally concern all citizens and 'cannot be directly related to one or more of the existing governance units' (McGinnis 2005, 9).

Initially used to examine cities, the idea of polycentrism has since been applied at larger scales. Scholars have examined the polycentric governance of human-environmental systems both within (Milman and Scott 2010) and across nations (Sovacool 2011). At all scales, analyzing polycentric systems requires paying attention to many centers of influence, and to the relationships among them. This is a very satisfying idea for scholars in our field, as 'systems thinking' is an emerging pillar of ESD. Yet, we should not take for granted that multiple centers of influence constitute a system, or that the boundaries of a system correspond to the boundaries of a nation-state. Are there truly *systems* of polycentric governance in our three countries, and if so, what are the consequences for international studies of ESD policy and practice?

We believe that this question can only be addressed by viewing a country's current circumstances in historical context. Indeed, the second lesson that emerges from our analysis is that within-nation historical trends can reveal the internal coherence of the complex, polycentric systems of ESD governance in South Africa, Brazil, and the USA. In each country, the influence of NGOs reflects their historical relationship to the state. Thus, as described above, South African NGOs have cooperated with the national government to set ESD policy since the early days of post-Apartheid democracy, whereas American NGOs accept funding from the national government but seek primarily to influence policy-makers at the state level. The players in a polycentric system are constantly renegotiating their relationships with each other, but they do so against the backdrop of established norms – 'typical' ways of making ESD happen.

This is the residual value of nation-level analysis in countries with relatively little central control over ESD. Even when a national government has no legal authority over ESD (as in the USA) or when national and regional policies are drastically undermined by the shortage of ESD-competent teachers (as in all three of our countries), the stable web of relationships within each country provides useful insight into what ESD means, and how it is implemented, at a particular moment in history. To make meaningful comparisons of ESD governance among countries such as ours, one must consider both the centers of influence that populate each polycentric system and the historical conditions that have made them into *systems*.

The recent historical context of ESD in each of our countries helps to substantiate this argument. For example, the significance of South Africa's ambitious sustainability policies must be seen in the context of 18 years of social reorientation that has left South Africans with a great deal of new policy. South Africa's 1996 Constitution enshrined the right of all South Africans to an environment that is not detrimental to their health and well-being and to sustainable management of natural resources for current and future generations. Since then, there have been many sustainability-related additions to South African policy. A new 'people-centered' environmental policy regime was introduced through the National Environmental

Management Act in 1998; this was incorporated into the National Sustainable Development Framework in 2007. In 2009, the government produced a national climate change mitigation strategy. Although the proliferation of ESD and CCE policies reflects real political concern for these issues, the ‘newness’ of discourses such as ESD and CCE in South African society presents a real challenge in a societal and policy context that is already saturated with new policy and rapid social transformation.

If domestic policy upheaval is key to understanding ESD governance in South Africa, the current forms of ESD governance in Brazil owe a considerable debt to international policies. The roots of Brazilian ESD go quite deep, but many current policy initiatives were set in motion by the 1992 United Nations Conference on Environment and Development. The ‘Rio Conference,’ as it is internationally known, was an important landmark for the host country, where it unified diverse perspectives and offered a core set of sustainability values that influenced Brazil’s approach to Agenda 21 (Brasil 2009). The social dimension of Agenda 21 emphasizes the promotion of a ‘sustainability culture’ through values like ethics, solidarity, cooperation, affection, and spirituality. In this context, education becomes a fundamental instrument for change through which the ideals of sustainability can be internalized by both citizens and institutions (Diegues 1992). The emphasis on sustainability culture also helps to explain why so many Brazilian initiatives focus on grassroots networks and efforts to strengthen civil society.

In the USA, the implicit partnership between Federal government, State government, and NGOs was forged during an earlier political era, when the federal government chose to play an agenda-setting role in ESD. During the presidency of William Clinton (1993–2001), the President’s Council on Sustainable Development (PCSD) convened stakeholder conferences that were notably successful in establishing a national vision for sustainable development (Maurer 1999a). The clarity and unity achieved by the PCSD were obscured and eventually lost in the face of shifting legislative priorities and partisan political conflict (Maurer, 1999b), but individual agencies continued to pursue the priorities established by the PCSD. By offering grants to local and regional NGOs, these agencies have helped foster a wide range of innovative programs (EPA 2002).

5. Implications for climate change education

To this point, we have said little about Climate Change Education. At the time of the IALEI report, there was little information available about CCE in our respective countries. The situation has improved, but CCE is still at a nascent stage characterized by iterative goal-setting initiatives and efforts to identify ‘promising practices’ (e.g. Forest and Feder 2011; Brasil 2008). In each of our countries, we found that scientific institutions were playing a very active role in CCE. For example, in South Africa, the Department of Science and Technology is driving the educational response to climate change under the banner of a Global Change National Research Plan (RSA 2010c). As a result, CCE is largely limited to climate *science* education in all three countries.

Our historical understanding of polycentric governance in Brazil, South Africa and the USA offers insight into what might happen next. In all three countries, governance for science education is more centralized than ESD governance, with clearer curricular policies and more resources devoted to implementation, teacher

education, and assessment. Unless influential NGOs devote time and resources to integrate ESD and CCE, the relatively centralized bureaucracies for science may overwhelm other sources of influence. In this case, ESD and CCE are likely to remain separate, with CCE restricted to science. It is even possible that ESD and CCE will be seen as competing programs. In the USA, sustainability-branded initiatives have been steadily supplanted by climate change initiatives in recent years. For example, the U.S. Conference of Mayors launched their Climate Protection Center after withdrawing from the Joint Center on Sustainable Communities in 2005. Although each country will ultimately address CCE in its own way, we believe that there is an urgent need to rethink the pedagogical strategies that are used to address climate change, and to identify ways of responding climate science's complex and troubling vision of the future (Freitas 2007; Guerra et al. 2010). This challenge will be more difficult if ESD is seen as an entirely separate and perhaps competing field of education.

6. Conclusion

According to our analysis, ESD governance is the product of a place-specific and historically contingent balance between national government, regional governments, and NGOs. As Crossley (2002) observed, 'national and local cultures can and do play a significant role in mediating global influences' (p. 82). What are the consequences for organizations such as the IALEI that sponsor cross-national comparative research on education? First, they should accept the fact that formal policies offer little insight into *de facto* governance in many countries. If they wish to offer truly insightful accounts of countries where national governments are only minor players in educational policy and practice, they must employ research methods that are sensitive to the realities of decentralized and polycentric governance. In concrete terms, this means examining the relationships between national, regional, and local governments, and accounting for the role of NGOs and civil society organizations. It also means placing a nation's current circumstances in historical context. Even brief historical accounts such as those offered above can help outsiders understand the relationships among forces that, together, constitute a polycentric system of governance.

Notes

1. Results of the report and accompanying recommendations (Læssøe, Schnack, Breiting, and Rolls 2009; IALEI 2009) are publicly accessible online at <http://www.intlalliance.org/home/>
2. The IALEI is an international collaboration among ten universities in the field of teacher education and educational research that aims to generate ideas, identify trends, and serve as a collective voice on important educational issues. It includes representatives from the Graduate School of Education, University of Melbourne, Australia; the Faculty of Education, University of São Paulo, Brazil; the Ontario Institute for Studies in Education, University of Toronto, Canada; the School of Education, Beijing Normal University, People's Republic of China; the Danish School of Education, University of Aarhus, Denmark; the National Institute of Education, Nanyang Technological University, Singapore; the School of Education, University of Cape Town, South Africa; College of Education, Seoul National University, South Korea; the Institute of Education, University of London, United Kingdom; and the School of Education, University of Wisconsin-Madison, USA.

3. In keeping with the editorial style of this journal, we have omitted most references to relevant laws and statutes from the three case study nations (these references are available from the authors on request). We have, however, included references to government reports where applicable.
4. In international development and international education literature, it is common to use the words 'North' and 'South' (or the phrases 'Global North' and 'Global South') rather than the phrases 'developed/industrialized nations' and 'developing nations,' which are overtly normative. There is some controversy over such terminology, but it is beyond the scope of this paper.

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