The Curriculum as a Governing Instrument – A Comparative Study of Finland and Norway

Christina Elde Mølstad* & Sven-Erik Hansén**

Abstract
Traditionally, the Nordic curriculum has been viewed as a document with school subjects in focus. This article reports on how two national curricula function as instruments for governing education and explores the possible differences in how national curricula govern education. This investigation was carried out by researching curricula for compulsory schools in Norway (2006) and Finland (2004). In Norway, the governing that emphasises output mechanisms is compared to Finland where the governing is distributed in a more intricate manner at three identified levels. All three levels in the hierarchical legal levels (Act, Regulation and circular letters) are directly activated in the formal rule system, whereas only the two first levels, as part of the formal rule system, are used within the Finnish curriculum decision-making structure. A second finding is that a consequence of the use of the formal rule system is that, at the higher level of the legal status, legitimacy is acquired through a process of essential voices being heard in the process of creating the curricula. Unlike the Finnish curriculum, the Norwegian curriculum does not have the same level of democratic procedures behind it concerning consultation over the content.

Keywords: curriculum, governing instrument, Norway, Finland, comparative research

Introduction
In this article, the use of a curriculum as an instrument for governing schools is studied in two national settings: Norway and Finland. In Northern European countries, the curriculum has traditionally been an ideological document in which the school subjects have been important. Today, however, the ideological input view of the curriculum seems to leave space for a new output ideology condensed in notions like accountability and the culture of evaluation. Langfeldt (2011) claims that, since the beginning of this millennium, governing by accountability has become an established mode of conducting education. Hopmann (2007) calls it “management by expectations” or a culture of evaluation, which implies that schools are made responsible for fulfilling their tasks within given frames. The focus of the new governing is therefore changing from one of control of internal processes in schools to a market-adjusted external control through, for example,
national tests and rankings as ways of stating quality (Langfeldt 2011; Hudson 2011; Afdal 2012).

The concept of governing is constituted of both the limitations and regulations of the central governing system in the schools and by the given space of action for participants. Thus, any curriculum involves governing as a process of influence on the curricular content that includes forms of control over who is to have the opportunity to influence the curriculum. Hence, governing and control are central to any curriculum theory (Lundgren 1979). The way the curriculum, as a governing instrument, has been used differs from time to time and country to country. It can be argued that, when viewing the curriculum as a legal document, it is evident that its vertical distribution on different levels is essential in the governing hierarchy. This deviates from the concept of governance in which a network is the “model” of governing (Ozga 2011) where a horizontal influence characterises the governing. In our view, governing is framed within hierarchical legal levels defined by the legal curriculum documents. However, as a governing instrument, the curriculum can take different forms and vary from being strictly regulated and detailed on one hand to being broadly governed on the other, thus bringing to the fore questions like “At which level of education systems are decisions concerning the curriculum made and what is the nature of decisions at each level?” Curriculum making is embedded within the state’s structures for managing the school system and interests around education. Lindensjö and Lundgren (1986) use the notion context of formulation to describe the formulation of educational politics and context of realisation, in which the curriculum is converted into practice. Our focus will be on variations in the governing system, supported by Hopmann et al. (2004, 13) who state that “…the question is not whether education is regulated, but at which level and to what degree”.

What is the relevance of this topic? The curriculum has been, and still is, the core means for conducting and structuring the content and time frame of education; studying the curriculum as a governing instrument reveals how education is regulated. It raises questions about whose voices are projected through the curriculum-making processes. In some countries, the national level of curriculum development plays an essential role in curriculum governing, while the governing of curriculum-making processes in other countries is to a great extent practised on the intermediate and/or local level. Regulation of the curriculum includes both the process of how the curriculum is developed and the outcome, or product, of this process. Another important issue for this study concerns comparisons of governing curricula structures in two countries: Norway and Finland. Both are countries with long traditions of national governing through curricula, although they have established differently framed legal frameworks for using their national curricula as instruments for governing compulsory schools. These two countries represent two cases that share several socioeconomic similarities, but show cultural and political
differences reflected in education and educational policy (Afdal 2012). Finland’s success in the international testing of students’ school achievements contributes to the interest in a comparative approach in which governing systems can be juxtaposed, and similarities and differences explored. The research literature is scarce and so far very few studies have been oriented to analysing the curriculum as an instrument for governing education in a comparative perspective, which accentuates the need for further investigation.

The aim of this article is therefore to deepen the understanding of how national curricula function as instruments for governing education and possible differences in how national curricula are used to govern. The focus will be restricted to governing, i.e., the power distribution within the education systems or the intention of control through the legally framed curriculum (Lundgren 1972) in the arena of formulation (Lindensjö and Lundgren 1986). This means that only national-level regulation, as reflected in curricula in the countries, will be investigated through the two governing authorities. The selected curricula are the Norwegian curriculum “Knowledge Promotion” (2006), and the Finnish curriculum “National Core Curriculum for Basic Education” (2004). The investigation is limited to compulsory schools in Finland and Norway.

**Theoretical Framework: Frame Factors Governing the Curriculum and Differentiation Processes**

The study of curriculum governing in different countries reveals, as previously mentioned, a variety of diverse ways to regulate and control schools (Elstad 2010). The concept of a national curriculum has long been the norm in Norway and Finland. Gundem (2008) characterises the concept of curricula in Nordic countries, and also in Germany, as first and foremost one that is associated with a written text formulated by the government and directed to the activities in schools.

Frame factor theory has been developed as a model for highlighting and structuring factors regulating the education system and governing through a curriculum (Lundgren 1972, 1977, 1979; Lundgren et al. 1984). Lundgren (1972) developed the frame factor theory on Dahllof’s paradigm (Lundgren 1972). The theory contains factors determined outside the teaching process that constrain, govern and regulate the teaching process, called frame systems (Lundgren, 1972, 1977, 1979; Lundgren et al. 1984). Nordin (2012) states that the frame factor theory contributes to a useful perspective on the governing of schools, especially after a school is being governed through resources and regulations. He further argues that the theory has applicable concepts related to school governing that can be connected to both macro- and micro perspectives. The frame factor theory illustrates how different aspects of education systems are linked to the curriculum.

Constituents of the theory are the goal, the frame, and the formal rule system (Lundgren 1972, 1977, 1979; Lundgren et al. 1984). The goal system is connected to
the curriculum and is the actual consequence of a specific curriculum, such as a syllabus, recommendations for teaching, teaching materials, and so forth. The frame system is linked to the administrative apparatus and comprises constraints of the teaching process outside of teaching itself. The constraints can be physical equipment (such as rooms), organisational arrangements (such as the size of the school and class), ability grouping, the time available for teaching, and so on. Last, the formal rule system contains regulations of a legislative nature concerning the school and the duties of the teacher (such as marking systems), and rules concerning the required number of lessons per week and demands for competency (Lundgren 1977). Lundgren also, at a later point, established evaluation as a separate part of the system. However, we chose to use the original frame factor theory. The reasoning behind that decision is that the original theory, especially the goal and frame systems, facilitates the highlighting of units for comparison and is thus an adequate theory for this research. The formal rule system and the goal system will mostly be used because the two curricula, as cases, both represent documents with a legal status.

To gain a better understanding of how national curricula are developed and how control is distributed, we will briefly describe and utilise a conceptual frame of differentiation processes of curricula. Hopmann (1991; also see Gundem 1993) identifies two essential differentiation processes: compartmentalisation and licensing. These concepts illustrate the differentiation between the three systems in the frame factor theory and demonstrate how the systems are connected and how they interact. The differentiation can be between and within the system, in our case the frame factor systems. Compartmentalisation concerns the process through which the formal rule systems, i.e., the educational regulations, are segmented into distinct sections. A result of this process is that no one can be responsible for the whole (Hopmann 1991). Gundem (1993) discusses that a result of compartmentalisation is that it provides fixed frames so that questions concerning the curriculum are limited to specific subject issues. It is not necessary to consider overall aims for education and schooling; this is internal differentiation (ibid.).

Licensing is based on an explicit differentiation of the responsibilities of content and methods; in this view, a teacher has the methodological abilities to handle whatever content is required, and the outcome of the instruction is not measured (Hopmann 1991). Gundem (1993) explains licensing as a hierarchical relation between different levels, an administrative mechanism wherein the responsibility of planning and control is separated from those with the responsibility for practice. We will use these two concepts to discuss how the frame factor systems are connected.

Methods
For this article we compare two countries: Norway and Finland. A curriculum as an instrument of governing concerns how the curriculum is constructed to prescribe the aim and content of schooling. By choosing Norway and Finland as our countries for
comparison, we are able to establish a discussion concerning how, in general, different shapes of national curricula create various types of governing instruments.

In this article, a comparison of the curriculum as a governing instrument will be made. To establish a systematised form for comparison, a well-framed concept of structure is important. Structure can be understood “as a group of interacting, interrelated, or interdependent components forming a complex whole” (Bray and Kai 2007, 26). This definition can be applied to any form of structure, and we refer this definition to the question of how the Educational Act and regulations define the curricula.

The comparative-research approach used raises several methodological challenges. How can a reasonable level of equivalence between the compared phenomena be reached? At least three aspects have to be taken into consideration when working comparatively: linguistic equivalence, organisational equivalence, and contextual equivalence (Backström-Widjeskog and Hansén 2002). Linguistic equivalence concerns the question of how to understand each other when different languages are involved. The challenge is to identify key notions and concepts that correspond and refer to the same phenomena. Striving for linguistic equivalence includes both the translation and an adequate utilisation of notions and concepts. The requirements for linguistic equivalence are demanding. The Finnish and Norwegian languages are not similar, and the language of education follows different structures, causing challenges in translations. Finland is a bilingual country with Finns in the majority, although Swedish is formally one of the two national languages. Legislation and official documents are written in both languages so the requirements for linguistic equivalence in this respect are filled. One issue we have had to address is the translation of the Finnish concepts, “asetus” and “ohjesääntö”, translated to Finland-Swedish, of “förordning” (asetus) and “föreskrift” (ohjesääntö) compared with the Norwegian concept of “forskrift”. We have chosen to translate both the Finnish and the Norwegian concepts with regulation, despite the fact that the concept of regulation will include two Finnish legal statuses. Other types of documents, investigations, reports etc. are often written only in Finnish and have to be compared with the Norwegian language via Swedish and further translated into English.

Organisational equivalence relates to the challenge of understanding how the organisation of curricula government is constructed and establishing a frame exposing prerequisites for comparison. The countries share traditions and habits and have, in many respects, gone through the same kinds of reorganisations of their education systems. The compulsory education is structured similarly; teacher education is provided by higher education institutions, and the teachers’ responsibility for educating young people is accentuated. On the other hand, there are also many differences between the education systems: for instance, the concept of teacher education, teachers’ competence requirements, and the structure of primary and secondary education (cf. Hopmann 2006; Afdal 2012).
Contextual equivalence concerns positioning the study in a context made understandable and comparable. In the following section, the context description describes organisational and contextual similarities and differences. Both countries share the basic values of a modern welfare society, and the cultural social and partly historical conditions are in some respects quite similar.

We tried to meet the challenges of comparative research by relating to three concepts of equivalence. For the analysis, we developed a hierarchical structure connected to the way national bodies are practicing curriculum governing (see the Appendix). The levels refer to the relationship between the goal system (ideological) and the formal rule (legal) system discussed (Lundgren 1972, 1977, 1979; Lundgren et al. 1984). The formal rule system materialised in regulations and a hierarchical framework therefore expresses the legal status of the curricula, dividing the governing into three legal levels:

- **Act (lov, lag)**
- **Regulation (forskrift/förordning/föreskrift)**
- **Circular letters (rundskriv, rekommendationer etc.)**

We include these levels with the governing bodies in the two countries. They are the Parliament, the Ministries, the Norwegian Directorate of Education and Training, and the Finnish National Board of Education. Thereby, we use the legal framework combined with the governing bodies to illustrate how the curriculum as a governing instrument functions in the two countries. This establishes a conceptual framework for investigating similarities and differences in the curricula and the connection between the goal and the formal rule system and governing. By making this link, we establish a connection between our two units of analysis: (1) the legal status and language of the curriculum documents; and (2) the national authorities. This will provide us with a discussion of how, in general, different shapes of national curriculum make various types of governing instruments.

For our research, we used a qualitative content analysis. The analysis focused mainly on a description of the manifest content of documents, but also allowed an interpretation of latent content (Aspfors 2012). This implies that we analysed the documents with an analytical-conceptual frame based on the framework we established through the frame factor theory. Thereby, we investigated the semantics of the systems, i.e., the semantics related to the connection between the goal and formal rule system.

Both countries’ documents related to curricular matters on the national context of formulation were used as empirical data for the content analysis. Only formal documents on the manifest level, and not underlying investigations and committee reports, were selected.
The Curriculum as a Governing Instrument

Curriculum Context
In the following section we describe the curriculum context for the two countries, which is background information necessary for understanding the findings and the discussion that follow. The most important issue of interest in this curriculum context is how the curriculum has been an instrument of governing the schools in the two countries. Two dimensions can describe the governing in an education system: The first concerns the location of power, and the second concerns the holders of power. This establishes dimensions between local and central, combined with political and professional (Granheim et al. 1990).

The curriculum in Norway is nationally determined and established by the government and Parliament, within a long tradition of being a state-based curriculum (Westbury 2008). The Norwegian seven-year compulsory school was established before the Second World War, with a resolution in the Norwegian Parliament in 1959, and in 1969 it was extended to nine years (Telhaug et al. 2006). Further, it can be said that in Norway the school has had the role of realising the values of Norwegian society: equality, justice, ‘Norwegianness’, and diligence. Because of this, it was important to be able to proscribe the content of schooling in certain ways through school legislation and curriculum guidelines (Gundem 1993).

In Norway, the role of the curriculum in governing has varied over time. Mønsterplan 74 was written for the individual teacher and recognised that the teacher should have the authority to make judgments concerning the content used for teaching. Traditionally, the teacher determined the teaching methods; however, the idea of the teacher deciding on the content was new. In addition, in the next curriculum, Mønsterplan 87, the choice of content was the responsibility of local-level educators. However, it was the teachers at a school who jointly developed the local curriculum. Together, the teachers were to establish the school’s platform and develop local subject plans with specific content for the teaching, i.e. power was situated at the local professional level. In the period from 1990 to 1995, the influence of educational experts was reduced in favour of a strong political centre, i.e. there was a shift in power from the professional to the political arena. This change was part of the establishment of the idea of a strong state combining central management with social democratic confidence in the strong state (Telhaug et al. 2006). In Norway, the decade of the 1990s, which saw many educational reforms, was also when most of the education system was transformed. The reforms continued in the 2000s with the reform called Knowledge Promotion in 2006. The reforms have issues related to how teaching is organised locally and in the classroom. With Reform 97 and L97, decisions that placed power at the local level with M87 moved to the national level. These reforms were revised and replaced by Knowledge Promotion with a set of subsiding curricular documents in 2006, keeping some parts of the curriculum documents from the Reform 94 and additional documents.
added after the year of the reform. The intention of Knowledge Promotion was to transfer much of the system back to decentralisation with a significant share of action and responsibility allocated to local school authorities and local schools (Engelsen 2008), thereby placing more power at the local level.

The governing of the curriculum system in Finland has hovered between centralised and decentralised governing structures since the comprehensive school system was established in the 1970s. The discussion has centred on the question of which parts and what levels in the educational organisation should be given the right to decide the curriculum. The decision-making process concerning the first curriculum for the comprehensive school was highly centralised. A Finnish state-curriculum committee report (1970) was converted to a formal curriculum through central decisions. The arguments behind the centralised decisions emphasised the demands for equal basic educational opportunities for each child, regardless of their social position, settlement or economic status. Further, the ideology behind the Finnish curriculum altered during the 1990s when decision-making became based on a more decentralised concept. A central authority should perform only those tasks that could not be performed effectively at a more immediate or local level, i.e. municipalities and schools. The curriculum from 1994 was an extreme expression of decentralisation, and the centrally formulated parts only contained general guidelines or a curriculum framework which had to be concretised in schools and local communities. Power over the decision-making process was moved to the local level, particularly to the schools. Teaching staff was given increased responsibility for developing and deciding the curricular content on the basis of the guidelines provided. Thus, the requirements of uniformity, according to the prevalent ideology, had to be balanced against the requirements of local variation (Hansén 1998).

The Finnish curriculum reform of 2004 is the object of this study. It is placed between the discussed extremes of centralised and decentralised decision making, but leans to the latter extreme. The context of formulation exposed a firmer grip on the decision-making process. The curriculum became more detailed than the previous one, and clearly prescribed the requirements. The curriculum document was named the National Core Curriculum for Basic Education by the Finnish National Board of Education (2004), and from now on will be referred to as NCCBE. Besides the description of the objectives and the core contents of the different subjects, the NCCBE also devoted attention to the principles of pupil assessment, special-needs education, pupil welfare, and educational guidance. Further, this curriculum framework described the principles of a good learning environment, working approaches, and the concept of learning. While the curriculum planning was decentralised, the process of evaluation was, on the contrary, centralised. Under NCCBE, schools were increasingly held accountable for the outcomes they were expected to produce. The decisions were made more centralised and shifted to the political level.
The Curriculum as an Instrument of Governing in Norway and Finland

How do the curricula in Norway and Finland serve as instruments for governing education? In this section, we present and discuss our comparative research. To systematise the analysis, we used the legal levels established in the methods section to establish a legal framework of the curriculum (see the Appendix for an extended table). The following table provides findings at the following three levels: Act, regulation, and circular letter.

1. Schematic view of the legal regulation of the curriculum

| Hierarchical legal framework | Norwegian governing body | Finnish governing body |
|-----------------------------|--------------------------|------------------------|
| Act                         | Parliament               | Parliament             |
| Regulation (Forskrift/Förrådning) | Government            | Government             |
| Regulation (Forskrift/Föreskrift) | Ministry of Education     | Ministry of Education   |
| Level Three:                | Directorate of Education and Training | National Board of Education |
| Circular letter (Rundskriv, rekommendationer, cirkulärvare etc.) | Directorate of Education and Training | National Board of Education |

The comparison resulted in extracting three themes that will be described and analysed: the legal framework, referring the formal rule system, the language structure, pointing to the formal language style, and the format structure, which is the physical format and characteristics of the curricula.

Legal Framework

On level one, both countries have curricula based on the same type of school legislation, namely educational Acts, which is to say that the requirements of organisational equivalence in that respect are met. The Acts are provided by the same kinds of legislative assemblies, i.e. by the parliaments.

On level two, however, the countries show various profiles, and different kinds of prescriptive regulations specifying the curricular government were identified and collected under the notion regulation. Governing actors are the governments, the Ministries of Education, and the Directorate of Education and Training in Norway and the National Board of Education in Finland.

On level three, containing circular letters etc., governing is practised through regulations and recommendations that are less prescriptive than those on the previous level. Thus, the legal framework moves from normative prescriptions on level one to less rigid, but often more detailed, recommendations on level three.
In Finland, on level two, succeeding the Act on level one, are the government regulations (Asetus/Förordning). The governing role of the Ministry of Education concerning the curriculum is indirect, meaning preparing Acts and regulations for the government and Parliament and commissioning the National Board of Education with tasks. The regulations provide the legal status (for instance, Regulation 1435/2001) concerning the curriculum, like stating the general national objectives of education, the distribution of lesson hours to the teaching of different subjects, and the subject groups. Based on the same regulation, the Finnish National Board of Education is given the responsibility for determining the objectives and core contents of different subjects and cross-curricular themes. Thus, the governing of the framework curriculum, NCCBE, is provided with legal status. The education provider (for instance, a school or a municipality) is responsible for adopting the curriculum for education referred to in the regulation from 2001. The documents on level three are rare in the Finnish context, and those few positioned here are usually different kinds of recommendations, messages, accompanying letters etc. expressed in the curriculum framework with ordinary and non-literary prose.

The governing system is different for Norway. Several of the Norwegian documents that follow the Act have the legal status of a regulation (forskrift), provided by the Ministry of Education 2006. The Regulation of the Educational Act, a document of legal regulation, specifies which other parts of the curriculum have legal status as a regulation. The documents with a regulation status are the core curriculum (Royal Ministry of Education Research and Church Affairs 1993) and subject curricula, the quality framework (Norwegian Directorate of Education and Training 2006), and the distribution of teaching hours per subject (Norwegian Directorate of Education and Training 2010a). The last document is a circular letter but, as already stated, it is a regulation by the Educational Act (Ministry of Education 2006). These curriculum documents are spread out at various levels of the legal framework (see the Appendix); however, the majority are at the level of regulation.

As already noted, the Norwegian curriculum was revised and largely replaced by a set of curricular documents in 2006, with additional documents added after the new educational reform, like circular letters etc. This illustrates that the emphasis placed on the curriculum has disintegrated. In Finland, the emphasis was on establishing a holistic national curriculum framework in 2004, which was completed with the curricular supplement/amendment in 2011 (Finnish National Board of Education 2011). The framework has to be converted by local school authorities into a school-based or municipality-based curriculum.

The difference is obvious when looking at assessment and the distribution of teaching hours within curriculum regulations in Norway and Finland. In Finland, these topics are integrated into the main national curriculum framework, whereas in Norway these topics are addressed and elaborated upon in separate documents or
circular letters at the level of the legal framework. The Norwegian Directorate for Education and Training (2010b) supplies the curriculum, concerning assessment, with a circular letter – Individual Assessment in Primary and Secondary Education According to the Regulation of the Educational Act. This 95-page document supplements and describes the regulation of the Act. On the first page of the document, it is stated that the purpose of the document is to be an encyclopaedia for interpreting the provisions in the regulation (Norwegian Directorate of Education and Training 2010b).

In this respect, Hopmann’s (1991) concept of licensing portrays an essential difference in the distribution of power in the two countries. School leaders and teachers in Norway have the mandate to directly interpret the curriculum regulations. By establishing the circular letter regarding assessment, it seems as though the Norwegian directorate steps into the area licensed for the teachers by providing school leaders and teachers with the directorate’s interpretation of the assessment regulation. The situation is different in Finland where the regulations concerning assessment are an integrated part of the framework curriculum provided by the National Board of Education.

Further, drawing on Hopmann (1991), the concept of compartmentalisation demonstrates the problems related to the perception of the curriculum as a unified and coherent entity. Compartmentalisation illustrates how the curriculum system is differentiated. Hopmann (1991) and Gundem (1993) state that if a system operates independently of its intentions there are consequences for the governing of the curriculum. If the distribution is concentrated, in this case, at a few levels, the governing system appears clearer and more distinct compared to a more widely distributed structure. In Norway, the governing mechanisms are, compared to Finland, distributed in a more intricate manner at the three identified levels of governing. All three levels in the hierarchical legal framework are directly activated in the ruling system; whereas only the two first levels, as part of the formal rule system, are emphasised within the Finnish curriculum decision-making framework. The Finnish system also exposes a different governing structure in relation to Norway on level two. Compared to Norway, the main direct actor on level two is the Finnish government, while the Ministry of Education governs on level two more indirectly. A wider structure, like in Norway, can make it challenging to identify where the power in the governing is shaped and who holds the power compared to Finland, where the distribution of governing is more concentrated.

In both countries, the national curricular documents play an important role in governing the content and objects of education but, as described, they take different routes in the legal framework. The national curricula in both countries contain the frame systems with goals, content, and the formal rule system. The national curricula contain regulations of legislative nature as described by Lundgren (1972, 1977, 1979; Lundgren et al. 1984).
Language Structure

The second topic of our findings and discussion concerns language structure dealing with the writing style in the documents combined with the levels of the legal structure. The language styles vary, depending on the three levels, from a legal level characterised by short, concentrated sentences and sections, minimised definitions, clearly stated purposes, logically arranged information units etc. to an extended factual, non-literary, narrative prose and well-defined notions on the second and third levels.

In the Finnish context, the top of the legal framework is the Act. The content is in the Act (Basic Education Act 628/1998), presented in topically separated sections, and the language reflects features characteristic of a highly legal character; for instance, the sentences begin repeatedly with the same word, the sentences and sections are short etc.

In the next Finnish document, the regulation explaining the Act (Ministry of Education and Culture, 2001) on the level of regulation, the legal style is equal to the Act except for the text being, as in regulation in general, more detailed, extended and continuous than in the Act.

The main curriculum document, the NCCBE by the Finnish National Board of Education (2004), has a prescriptive (föreskrift) status, as clearly stated on the front page and located at the regulation level. The curriculum is published as a book, with chapters and ordinary headings. In the curriculum, the legal writing style is replaced with ordinary and extended factual prose. One typical textual feature is the prescriptive style; for instance, objectives for different subjects are listed under headings such as “The pupil shall...”. The central content is also presented in lists of statements and key words, thus emphasising the mandatory governing delegated to the National Board of Education.

The Norwegian Act is written in the same formal legal style as in the corresponding Finnish document. In the Norwegian Educational Act, the language is very similar to the Finnish case. The next document in Norway’s legal framework is the regulation specifying the Educational Act (Ministry of Education and Research 2006). The stylistic characteristics of the language are almost equal to the Norwegian Educational Act.

Two Norwegian subject documents included in this research at the level of regulation are the curriculum for the subjects of Norwegian (Ministry of Education and Research 2010b) and mathematics (Ministry of Education and Research 2010a). Both of these documents are placed at the same level, with a language style that is less formal, with no paragraphs in the headings, more consistent language, and longer sections. As in the Finnish case, the text is written in ordinary and extended factual prose. The curriculum for the Norwegian subject at the level of regulation in the legal structure reads as follows:
The purpose of the subject

The Norwegian subject has been central for cultural understanding, communication, education and identity development. Through the active use of the Norwegian language in their texts and in interaction with others, children and young people are included in culture and society. The Norwegian subject opens a venue where they have an opportunity to find their own voices, speak, be heard and receive answers (Ministry of Education and Research 2010b, 1).

The next document in the Norwegian legal framework is the Quality Framework (Norwegian directorate of education and training 2006) by the Norwegian Directorate of Education and Training at the regulation level. The writing style is the same as for documents covering curriculum subjects. For example, see page 3 of the Quality Framework (Norwegian directorate of education and training 2006). These Norwegian documents feature more or less the same style of writing. The headings have no references to paragraphs, nor are there any references to paragraphs in the text. Further, the topics of the sentences follow each other in a logical way, which provides a coherent text.

At level three concerning circular letters in the legal framework, the difference between the governing systems in Norway and Finland is visible concerning the topics of assessment and distribution of teaching hours. While no national governing document besides the Integrated Curriculum Framework (2004), completed with the Curricular Supplement (2011), was identified by the Finnish National Board of Education, the Norwegian Directorate produced two documents within the studied time frame. These two documents are the circular letter concerning distribution of teaching hours per subject and the circular letter concerning assessment. The difference between these two documents is that, by the regulation of the Education Act, the circular letter concerning distribution of teaching hours per subject has status as a regulation despite the fact that it is placed on the circular-letters level. However, the document has a style and language with fewer references of a legal type than the circular letter concerning assessment. See, for example, pages 7–8 of the circular letter on assessment (Norwegian Directorate of Education and Training 2010b). Here, one sentence comprises a section by itself, and the text frequently contains paragraphs. This stands in contrast to the circular letter on distribution of teaching hours per subject (Norwegian Directorate of Education and Training 2010a, 2), in which the heading and text make no reference to paragraphs. Therefore, the documents with the highest legal status of the two documents have less legal language style than the document with the lowest legal status. This shows that the writing style of the Norwegian curriculum does not correspond with the legal framework in the country. In addition, the circular letter concerning assessment has more legal references than, for example, the Quality Framework located at the higher level of the governing structure.
In summing up the observations, it is noticeable that in scrutinising the documents the language framework was not the main theme of interest, but while reading the documents we became gradually more aware of the language features characterising the curriculum texts. The language style in the Act was, in both cases, quite homogeneous. One feature in the Finnish curriculum documents is that the language style corresponds with the legal hierarchical framework, which means the curriculum, and therefore the function of the documents, is clearly defined. This again makes the curriculum clearer as a governing instrument.

**Format Structure**

A third unexpected observation we made is the difference in the concrete format of the curriculum systems. The main Finnish framework curriculum document (Finnish National Board of Education 2004) is published with all descriptions, featuring a book, cover, preface, content list, chapters, ordinary headings etc. and contains a collected and holistic set of topics. Further, an imprint of the regulation (1435/2001) is placed between the covers. The Norwegian curriculum, on the contrary, is not published as a book, but is made up of several documents produced over a period of time.

The differences in the format structure reveal different perceptions of the curriculum. Both have their advantages and disadvantages. The curriculum is a holistic document, i.e. a book that provides all information collected while challenging the risk of being disintegrated. The curriculum as separate documents is open to ongoing integrated changes, while an overview of the total curriculum is difficult to accomplish.

**Conclusion: Curricula as Governing Structures**

The aim of this article was to study the curriculum as an instrument of governing compulsory school in Norway and Finland. Our efforts to establish comparable phenomena permeated the writing process.

Establishing contextual equivalence was the focus of our effort to understand the entire education systems in their respective national contexts, which was not a major problem because the educational contexts are relatively similar. The main emphasis and challenge was on understanding the governing of the curriculum. To reach organisational equivalence, thorough investigative activities and discussions, as well as the study of documents, were required. Establishing a frame (shown in Table 1 and Appendix 1) of the legal framework by identifying three levels clearly established a relatively reasonable structure of organisational equivalence. Each country’s governing is complicated in itself, but the complexity will increase even more when it has to match and apply to the structures in two countries.

In close connection with our efforts to establish organisational equivalence, we also faced the challenges of establishing language equivalence, which caused several
problems in the efforts to select adequate notions referring to the studied objects. How to select notions with the capacity to capture the essence of a certain phenomenon in both countries, particularly the specified legal language attached to national traditions, with various connotations and all that this implies, entailed a continuous balancing of notions on the levels of Act and regulation. Further, the fact that four different languages were involved in the writing process also contributed to the complexity.

Lundgren’s frame factor theory offered an appropriate platform for highlighting curricular themes as the focus for this article. The results were presented and discussed according to the three levels identified in the countries’ governing and within the context of three themes: *legal framework, language structure, and format*. Frame factor theory highlighted the fact that the curriculum is connected to the goal system. Further, when addressing the legal status of the curriculum in Finland and Norway, it seems that the goal system is connected to the formal rule system in an inseparable way. However, the concepts of licensing and compartmentalisation demonstrate that the formal rule system can govern in different ways. This is illustrated through the comparative perspective threads that can be collected in two major topics and that expose similarities and differences between the governing in both countries. The first concerns profiles in the *distribution power* on various levels. The second topic relates to the external *format of the curriculum* reflecting conceptions of governing. We will discuss these two topics, which form the foundation for our primary conclusion.

The first topic concerns the *distribution of power*, and the profiles for each country vary. This relates to the use of circular letters in Norway. Here the questions of which procedures are required to change the curriculum are important. Certain types of documents need hearings etc. to be changed; this applies to regulations and acts. Other legal documents can be changed without any involvement outside the educational authorities. Therefore, it is important to be aware of what legal status the curriculum documents reflect and where the power to change it is situated. Further, this leads to a reflection on how the Norwegian circular letter provides a middle interpretation of the Regulation of Educational Act and thereby moves into the area licensed for the teachers and school leaders. This places additional power in the governing system and undermines the teachers’ responsibilities.

The second topic, the *curriculum format*, showed quite different profiles for the countries. Traditionally, curricula in Norway and Finland, as in other Nordic countries, have been printed as compiled and holistic books, and remained in force a certain number of years. Finland still follows the tradition, while Norway has made a qualitative change. The change of the curriculum format in Norway might be a result of compartmentalisation. The Norwegian solution, meaning a set of *separate* curriculum documents, places the emphasis on an approach aimed at meeting the requirements of an ongoing process of development in accordance with changes in
Knowledge Production. This process approach, by having the curriculum in separate documents, enables a continuous and flexible avenue of change. The differences in the formal structure of the studied curricula represent expressions of how to understand, interpret, and steer curriculum development. Therefore, the format of the curricular documents is not only a practical matter, but also a conceptual issue about which functions the curriculum is intended to serve and about what curriculum development is. Further, it is interesting to reflect on whether or not the compartmentalisation of the curriculum can lead to different ways of interpreting the curriculum at the school level.

Finally, this article has shown that both countries have in recent years developed curriculum governing connected to the formal rule system, meaning that the curricula have become part of a prescriptive legal framework. Before this connection was made, the curricula were an instrument for helping teachers placed in the goal system for facilitation and preparations of teaching; this was the semantics of didactics. Further, now that the curricula are connected to the formal rule system, the language becomes clearly connected to political and legal semantics. In this article, we have shown that this connection between the goal system and the formal rule system has implications for the concept of curriculum and what curricula are. This article also showed that there are different ways to use a curriculum as a governing instrument. By using the third level of the legal framework, possibly as a result of compartmentalisation, the Norwegian curriculum does not have the same level of democratic procedures behind it as the Finnish curriculum. These democratic procedures provide legitimacy acquired through a process of essential voices in the process of creating the curricula. Further, the Norwegian curriculum includes the directorate’s interpretation of parts of the curriculum and therefore steps into the licensing of the teachers. We argue that these two issues change the curriculum. The major consequence of the use of the formal rule system is that, at a higher level of the legal framework, legitimacy is acquired through a process of essential voices in creating the curricula. Norway, with its circular letters, does not include these processes and thus undermines the curriculum in the formal rule system, i.e. the legal system. Thus, the Norwegian government’s tight regulation of the curriculum seems to be an expression of less trust compared to Finland where a more autonomous space for action is provided for teachers.

Christina Elde Mølstad & Sven-Erik Hansén

750
References

Afdal, Hilde Wa˚ga˚s (2012). Constructing knowledge for the teaching profession. A comparative analysis of policy making, curricula content, and novice teachers’ knowledge relations in the cases of Finland and Norway. Oslo: University of Oslo.

Aspfors, Jessica (2012). Induction practices: experiences of newly qualified teachers. PhD diss., Åbo Akademi University.

Backström-Widjeskog, B. & Hansén, Sven-Erik. (2002). Problem concerning comparative research of curriculum development. In Comparing Curriculum-Making Processes, M. Rosenmund, A.-V. Fries & W. Helle (eds.), 55–71. Bern: P. Lang.

Bray, Mark & Kai, Jiang (2007). Comparing systems. In Comparative Education Research: Approaches and Methods, Mark Bray, Bob Adamson & Mark Mason (eds.), 123–144. Hong Kong, Comparative Education Research Centre, University of Hong Kong.

Elstad, Eyvind (2010). In PISA: sannheten om skolen? Elstad, Eyvind & Sivesind, Kirsten (eds.). Oslo: 54-66. Universitetsforlaget.

Engelsen, Britt Ulstrup (2008). Kunnskapsløftet sentrale styringssignaler og lokale strategidokumenter. Oslo: Universitet i Oslo, Pedagogisk forskningsinsitutt.

Granheim, Marit, Kogan, Maurice & Lundgren, Ulf P. (1990). Evaluation as policymaking: introducing evaluation into a national decentralised educational system. London: Jessica Kingsley Publishers.

Gundem, Bjørg Brandtzæg (1993). Mot en ny skolevirkelighet?: læreplanen i et sentraliserings- og desentraliseringsperspektiv. Oslo: Pensumtjeneste.

Gundem, Bjørg Brandtzæg (2008). Perspektiv på læreplanen. Bergen: Fagbokforlaget.

Hanseń, Sven-Erik (1998). Preparing student teachers for curriculum-making. Journal of Curriculum Studies, 30(2), 165–179.

Hopmann, Stefan. Retracing curriculum theory: the multiple realities of curriculum making. (1991). In Curriculum Work and Curriculum Content: Theory and Practice: Contemporary and Historical Perspectives, Bjørg Brandtzæg Gundem, Britt Ulstrup Engelsen & Berit Karseth (eds.), 49–69. Oslo: University of Oslo, Institute for Educational Research.

Hopmann, Stefan. Læreruddannelsen i Norden - et internationalt perspektiv. (2006). In Læreruddannelsen i Norden, Skagen, Kaare (ed.), 109-136. Kristiansand: Forl. Unge Pædagoger.

Hopmann, Stefan, Afsar, Azita, Bachmann, Kari Elisabeth & Sivesind, Kirsten (2004). Hvordan formidles læreplanen?: en komparativ evaluering av læreplanbaserte virkemidler – deres utforming, konsistens og betydning for læreres praksis. Kristiansand: Høgskolen i Agder.

Hopmann, Stefan (2007). Epilogue: no child, no school, no state left behind. Wien: LIT-Verlag, 363–400.

Hudson, Christina (2011). Evaluation – the (not so) softly-softly approach to governance and its consequences for compulsory education in the Nordic countries. Education Inquiry, 2(4), 671–687.

Langfeldt, G. Ansvarsstyrning – didaktikens slutpunkt? (2011). In Allmändidaktik – Vetenskap för lärare, S.-E. Hansén & L. Forsman (eds.), 133–152. Lund: Studentlitteratur.

Lindensjö, Bo & Lundgren, Ulf P., ed. (1986). Politisk styrning och utbildningsreformer. Stockholm: Liber Utbildningsförlaget.

Lundgren, Ulf P. (1972). Frame factors and the teaching process: a contribution to curriculum theory and theory of teaching. PhD diss., Göteborg, Acta Universitatis Gothoburgensis.

Lundgren, Ulf P. (1977). Model analysis of pedagogical processes. Lund: CWK/Gleerup.

Lundgren, Ulf P. (1979). Att organisera omvärlden: en introduktion till läroplansteori. Stockholm: Liber Förlag.
Lundgren, Ulf P., Wallen, Erik & Svingby, Gunilla (1984). Makten över läroplaner: en konferensrapport. Stockholm: Högskolan för lärarutbildning.

Ministry of Education and Culture. (2001). Regulation concerning national goals for education (No. 143572001). [Statsrådet (2001) Statsrådets förordning om riksomfattande mål för utbildningen enligt lagen om grundläggande utbildning och om timfördelning i den grundläggande utbildningen. 1435/2001]. Helsingfors.

Ministry of Education and Research. (2006). The regulation of the educational act [Kunnskapsdepartementet (2006): FOR 2006-06-23 nr 724: Forskrift til opplæringslova.]

Ministry of Education and Research. (2010a). The mathematics subject curriculum. [Kunnskapsdepartementet (2010a) Læreplan i fellesfaget matematikk.]

Ministry of Education and Research. (2010b). The Norwegian subject curriculum. [Kunnskapsdepartementet (2010b) Læreplan i norsk.]

Nordin, Andreas (2012). Kunskapens politik – en studie av kunnskapsdiskurser i svensk og europeisk utvildningspolicy. PhD diss., Linnaeus University.

Oftedal Tellhaug, Alfred, Medås, Odd Asbjørn & Aasen, Petter (2006). The Nordic Model in education: education as part of the political system in the last 50 years. Scandinavian Journal of Educational Research 50(3): 245–283.

Ozga, Jenny (2011). Governing narratives: “local” meanings and globalising education policy. Education Inquiry, 2(2), 305–318.

Parliament. Basic Education Act (628/1998) with amendments. [Undervisningsministeriet (1999) Lag om grundläggande utbildning 21.8.1998/628.]

Parliament. The Educational Act (LOV 1998-07-17 nr 61). [Stortinget (1998) LOV 1998-07-17 nr 61: Lov om grunnskolen og den videregående opplæringa (opplæringslova).]

The Finnish National Board of Education. (2004). National Core Curriculum for Basic Education. [Utbildningsstyrelsen. 2004. Grunderna för läroplanen för den grundläggande utbildningen 2004.]

The Finnish National Board of Education. (2011). Changes and supplements to the curriculum for basic education 2011. [Utbildningsstyrelsen. 2011. Ändringar och kompletteringar av grunderna för läroplanen för den grundläggande utbildningen 2011.]

The Norwegian Directorate of Education and Training. (2006). The quality framework [Utdanningsdirektoratet. 2006. Prinsipper for opplæringen.]

The Norwegian Directorate of Education and Training. (2010a). Distribution of teaching hours per subject. [Utdanningsdirektoratet. 2010a. Rundskriv UDir -08-2010 Kunnskapsloftet - om fag- og timefordeling for grunopplæringen og tilbudssstrukturen i videregående opplæring.]

The Norwegian Directorate of Education and Training. (2010b). Circular letter about assessment. [Utdanningsdirektoratet. 2010b. Udir-1-2010 – Individuell vurdering i grunnskolen og videregående opplæring etter forskrift til opplæringsloven kapittel 3. Utdanningsdirektoratet.]

The Royal Ministry of Education, Research and Church Affairs. (1993). The core curriculum. [Det kongelige kirke-, utdannings- og forskningsdepartement. 1993. Generell del av læreplanverket]

Westbury, Ian (2008). Making curricula: why do states make curricula and how? In The SAGE Handbook of Curriculum and Instruction, F. Michael Connelly, Ming Fang He & JoAnn Phillion (eds.), 45–65. USA: Sage Publications.
### Appendix 1 Governing Framework

| Hierarchical legal framework | Norwegian governing body | Finnish governing body |
|------------------------------|--------------------------|------------------------|
| **Level one:**               |                          |                        |
| Act                          | Parliament               | Parliament             |
|                              | The Educational Act     | Basic Education Act    |
|                              | (LOV 1998-07-17 no. 61) | (628/1998) with        |
|                              |                          | amendments             |
| **Level two:**               |                          |                        |
| Regulation (forskrift/fo¨reskrift/förordning) | Government             | Government             |
|                              | Ministry of Education and Research (2006): The Regulation of the Educational Act | Ministry of Education and Research (1435/2001) |
|                              | The Royal Ministry of Education, Research and Church Affairs (1993): The core curriculum |                    |
|                              | Ministry of Education and Research (2010): The Norwegian subject curriculum |                    |
|                              | Ministry of Education and Research (2010): The mathematics subject curriculum |                    |
| **Level three:**             |                          |                        |
| Circular letter (rundskriv/rekommendationer etc.) | The Norwegian Directorate of Education and Training (2006): The quality framework | The Finnish National Board of Education (2004): National Core Curriculum for Basic Education |
|                              | The Norwegian Directorate of Education and Training (2010b): Circular letter about assessment | The Finnish National Board of Education (2011): Changes and supplements to the curriculum for basic education 2011 |
|                              | The Norwegian Directorate of Education and Training (2010a): Distribution of teaching hours per subject | Recommendations of different kinds and accompanying letters, messages etc. |