School Censorship Appropriateness

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Significant tensions surrounding the topic of censorship in schools have existed for decades. These tensions reflect issues that have vexed and perplexed societies since ancient times. Navigating the tensions and complexities is essential for educators, parents, and other mentors concerned about helping students develop media and socioemotional literacies in a technology-saturated world.

In modern history, censorship in schools has involved educators deciding—often in a vacuum—what content is appropriate for libraries, curricula, or student expression. The digital age has introduced new layers of complexity into age-old debates, as new media mix with old and as information access can extend far beyond the walls of a brick-and-mortar classroom or library. Through the Internet, most people in the free world, including children and youth, can have access to nearly unlimited information. One-third of people in the world have a social media profile, and percentages are projected to continue to rise (Statistica, 2017). Nearly any person with Internet access can challenge existing institutions and voices of authority in unprecedented ways. The likelihood of children and youths being exposed to potentially offensive or dangerous content is higher than ever. These realities intensify the debates around censorship and invite schools to renegotiate norms related to content management and appropriateness.

But, even as new media introduce new layers to debates about censorship, many of the issues at the heart of the current discussion mirror debates of the past. History illustrates that, in dealing with human systems, the question is never *whether* a moral code is dictating decisions about things such as content access and control; the questions are *whose* moral code is at the helm at any given time, *why* and *how* that code is being upheld, and what norms exist around open discourse and whether discovery is being encouraged or supported. History teaches that navigating these questions is never simple or straightforward; thus some engagement with the lessons and patterns of history can help give context for those who negotiate (or renegotiate) norms related to content management and appropriateness in schools.

Censorship as a formal concept can first be traced back to Athens in the 5th century BCE (Newth, 2010). Censors were not only charged with the census and financial matters but were also responsible for protecting the state's definition of morality in society.

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Censorship was projected as an action toward the greater good, when in reality it reinforced the government's power with little to no respect for individual will or thought. In ancient Athens, heavy-handed government censorship was the force that led to the death of Socrates (Mark, 2009), a man considered by many to be one of the greatest moral philosophers in history.

Technological and societal advances have had a significant impact on issues related to censorship, and parallels to the digital age are important to note (Ludlow, 2016). For example, the widespread dissemination of information that came with the printing press increased institutional fears, concerns, and attempts at censorship (Cotter 2003; Newth, 2010; Wilke 2013). The expanded availability of information during this period significantly impacted educational processes as well. "Learning no longer required the presence of a mentor; it could be done privately" (Dewar, 1998). The printing press increased the amount of erroneous information that coexisted with truth, increasing both the opportunities and the need for individual discernment. In addition, conflicts among thought leaders became more visible in society, often increasing cultural and philosophical confusion (Rosaldo, 1981).

The constitution of the United States of America was the first successful attempt to codify more of a balance of ideological power between governments and individuals (see the Bill of Rights at https://www.archives.gov/founding-docs/bill-of-rights-transcript). Policies in other nations were eventually developed that expanded protections for citizens and facilitated more civic participation (Wilke, 2013). These significant changes did not eliminate tensions between institutional and individual forces, however; if anything, they brought such tensions more clearly into view, as individual rights gained increased protection in the public square. And, even as codified rights around freedom of speech demanded more accountability from governments and other institutions, they also recognized the need for individual citizens to accept the responsibilities that are intertwined with such freedom (see Council of Europe, 1995—which, as the title indicates, is an edition of Article 10 from the 1950 document).

The various pieces of this history, as well as the continuing debates around censorship, make it clear that there are rarely clear-cut answers about how to navigate the tensions around censorship issues. In schools, "educators [must] balance [free expression] obligations and principles against other concerns—such as maintaining the integrity of the educational program, meeting state education requirements, respecting the judgments of professional staff, and addressing deeply held beliefs in students and members of the community" (NCAC, n.d.). Another topic commonly broached in discussions of censorship is the responsibility of schools to balance students' rights to free speech with the school's responsibility to maintain order and an appropriate learning environment.

A case that made its way to the United States Supreme Court, *Hazelwood School District v. Kuhlmeier* (1988), illustrates the kinds of tensions inherent in both historical and current discussions around content management and freedom of expression in schools. Journalism students claimed that their free speech rights were violated when the school's principal required that two articles from the school's paper be deleted. The district court held that the students' rights had not been violated. The case was appealed, and the court of appeals overturned the original ruling. However, in a 5-3 decision, the US Supreme Court reversed the second court's decision, protecting

schools' rights to censor material *under certain limited conditions and for certain limited reasons*. It should be noted that this case does not provide justification for carte blanche censorship in schools, but can be misused by those favorable to heavy-handed school censorship.

In *Hazelwood* (1988, p. 268), the Court ruled that "public schools do not possess all of the attributes of streets, parks, and other traditional public forums" when it comes to free speech protections. Schools may define curricula, projects, or activities as existing for purposes *only* within the educational setting, and not within the public square. Thus some educational activities may be allowed restrictions on speech in order to "assure that participants learn whatever lessons the activity is designed to teach, that readers or listeners are not exposed to material that may be inappropriate for their level of maturity, and that the views [or poor quality of communication] of the individual speaker are not erroneously attributed to the school" (p. 271). The Court also maintained that the principal's decision—considering the time constraints imposed by publishing deadlines and his concerns about adherence to potentially substandard journalistic standards of privacy and fairness—was well within reason.

Obviously, the 5–3 Court ruling illustrates that there was disagreement about the best course of action. The dissenting opinion insisted that the Court's decision undermined a previous, landmark decision of the Court (see *Tinker v. Des Moines Independent Community School District*, 1969) and violated the students' need to engage in learning experiences "required not merely to survive in, but to contribute to, civilized society" (*Hazelwood* 1988, p. 278). Concerns of the dissenting opinion also included significant fears about establishing a precedent for potential institutional abuses from which free speech rights intend to protect individuals, and alleged overreach of the Court's role in establishing standards for the educational process.

Tensions and dissentions throughout the process of the *Hazelwood* case—from the principal's decision to the original court case, to the appeal, to the Supreme Court decision, to the dissenting opinion, and to current debates around the case—spotlight the difficult challenges and intense disagreements around issues related to censorship and appropriateness. The case can also underscore why media literacy education (MLE) is so important in schools.

The dissenting opinion acknowledged that educators face "weighty and delicate" challenges in "preparing ... youth for life in our increasingly complex society and for the duties of citizenship." Such a responsibility involves "particularized and supremely subjective choices among diverse curricula, moral values, and political stances to teach or inculcate in students, and among various methodologies for doing so" (*Hazelwood* 1988, p. 278).

It should be assumed that every player in the case endeavored to the best of his or her ability to make appropriate decisions in his or her spheres of influence, and yet intense disagreement defined the nature of the case. Media literacy skills can prepare students and adults alike for such difficulties, which are endemic to both educational and civic processes. Individuals must continually learn how to assimilate multiple pieces and layers of information; to research, cite, and debate various sides of an issue; to make room for different opinions; and to take action with integrity to conscience—while respecting others' rights to do the same.

Hazelwood clearly illustrates that media literacy skills do not guarantee protection against continued tensions and vigorous debates; there will always be disagreement on controversial topics such as censorship. But the ability to allow for and lean into such tensions is at the heart of healthy relationships, schools, and societies. For this reason, MLE is critical to preparing students to become contributing members in all spheres of their lives—personal, educational, professional, digital, local, and even global.

Because issues surrounding censorship and appropriateness are complex, educators and administrators would be wise to engage both students and parents in exploring these issues, rather than making unilateral decisions. Such participatory discussions could not only help bridge the frequent divides that may exist between schools and their beneficiaries, but also leverage the lived experience of youths and their families. This kind of participation could be sought for anything, from creating policies for acceptable technology use in the school to discussions about school curricula, programming, age appropriateness, and conflict resolution at school. Educators and administrators could even consider discussing case studies in their communities in order to raise further awareness about these complexities. For example, schools could explore censorship debates that currently exist in the realm of higher education in the United States—for example, the appropriateness (or lack thereof) of so-called *safe spaces* and *trigger warnings* (Vivanco & Rhodes, 2016), or the appropriateness (or lack thereof) of boycotts or violent protests of guest speakers (Newsome, 2017).

Allowing parents to give input on how to address controversial topics—such as sexual health; substance, sexual, verbal, or Internet abuse prevention; pornography prevention, age-appropriate Internet filtering or monitoring; and crime or violence prevention—enables these parents to make themselves heard, while also giving them opportunities to better appreciate the complexity of these issues and the difficult responsibilities placed on educators.

In such discussions it should be acknowledged that it is not uncommon for material that contains threads of challenging themes to be the material that some will seek to censor (Rickman, 2010). Media literacy educators can help parents, peers, administrators, and others to understand that, especially when students have been exposed to MLE concepts, engaging material with some degree of conflict or controversy can help them consider and build their own sense of values and personal morality. Such engagement can also help them assimilate, vicariously, life lessons that adults often don't want children to have to learn through hard, potentially harmful experience. With MLE principles as a foundation, students can also learn to have conversations among themselves about possibly controversial subjects while respecting others' values and experiences in the process.

While benefits of MLE have been known to media literacy experts for decades, far too few influencers outside of the realm of MLE (and still too few within the education sector) understand or practice media literacy principles in personal, political, or professional spheres. In addition, some people are using and sometimes commercializing the term *media literacy* in ways that frame it as nothing more than checking facts in the face of fake news or some sort of agenda-driven fad. Media literacy experts face significant barriers to helping people understand how critical MLE is to empowering

students to build skills for lifelong learning, civic engagement, and healthy personal and professional relationships.

To address these and other challenges, in addition to engaging all players in school communities, experts in MLE should also find ways to collaborate with experts in other sectors (Impero Software, EPIK Deliberate Digital, Digital Citizenship Institute, & Educate Empower Kids, 2017). A growing research base has demonstrated that media literacy holds much promise for helping youths develop critical skills for living in a digital age. For example, a meta-study review found that media literacy interventions counteract effects associated with risky and antisocial behaviors, and research indicates that MLE increases civic responsibility and participation. It can also significantly impact students' self-efficacy, attitudes, influence, perceptions, and beliefs (Jeong, Cho, & Hwang, 2012; Cohen, Kahne, Bowyer, Middaugh, & Rogowski, 2012). But much more collaborative, multidisciplinary research exploring the potential benefits of MLE is needed to raise awareness and legitimacy of MLE, in the hope of increasing levels of support and funding for MLE.

Research should continue to explore how media literacy can help students build internal heuristics in order to analyze, filter, process, and create media; to avoid dangers endemic to the digital age; and to both listen and share ideas with the intent to help foster a culture of respect and innovation. Research could also be done to explore media literacy's potential benefits for adults in educational, professional, civic, and personal realms.

As media literacy principles become more entrenched in the broader culture *around* schools, tensions about issues related to censorship and appropriateness *within* schools could be navigated in more effective ways.

SEE ALSO: Acceptable Use Policies; Adolescent Literacy in a Digital World; Connected Learning; Critical Information Literacy; Critical Theory Applied to Media Literacy; Digital Literacy; Media Access and Activism; Media Activism and Action-Oriented Learning; Participatory Action Research; Participatory Politics and the Civic Dimensions of Media Literacy; Youth Digital Culture

References

Cohen, C.J., Kahne, J., Bowyer, B., Middaugh, E., & Rogowski, J. (2012). *Participatory politics: New media and youth political action*. The MacArthur Research Network on Youth and Participatory Politics. Retrieved from https://ypp.dmlcentral.net/sites/default/files/publications/Participatory_Politics_Report.pdf

Cotter, T.F. (2003). Gutenberg's legacy: Copyright, censorship and religious pluralism. *California Law Review*, 323. Retrieved from https://scholarship.law.berkeley.edu/cgi/viewcontent.cgi?article=1378&context=californialawreview

Council of Europe. (1995–2016). The European Convention on Human Rights (1950), Article 10. Retrieved from http://www.hri.org/docs/ECHR50.html

Dewar, J.A. (1998). The information age and the printing press: Looking backward to see ahead. Rand Corporation. Retrieved from https://www.rand.org/pubs/papers/P8014/index2.html#fnb39

Hazelwood School District v. Kuhlmeier, 484 US 260 (1988). Retrieved from http://www.bc.edu/bc_org/avp/cas/comm/free_speech/hazelwood.html

Impero Software, EPIK Deliberate Digital, Digital Citizenship Institute, & Educate Empower Kids (2017). *Prevention science: A framework for positive digital citizenship*. Retrieved from https://digcitsummit2017.com/wp-content/uploads/2017/07/White-Paper-A-Framework-for-Positive-Digital-Citizenship.pdf

Jeong, S.H., Cho, H., & Hwang, Y. (2012) Media literacy interventions: A meta-analytic review. *Journal of Communications*, 62(3), 454–472. doi: 10.1111/j.1460–2466.2012.01643.x

Ludlow, L.M. (2016). Johannes Gutenberg's information revolution: Foundation for economic education. FEE. Retrieved from https://fee.org/articles/johannes-gutenberg-benefactor-ofhumankind

Mark, J. J. (2009). Socrates. In *Ancient History Encyclopedia*. Retrieved from https://www.ancient.eu/socrates

National Coalition against Censorship (NCAC). (n.d.). The First Amendment in schools: Censorship. NCAC. Retrieved from https://ncac.org/resource/the-first-amendment-in-schools-censorship

Newsome, B. (2017). When "protest" is *wrong*. Berkeley Blog, UC Berkeley. Retrieved from http://blogs.berkeley.edu/2017/02/02/when-protest-is-wrong

Newth, M. (2010). The long history of censorship. Beacon for Freedom of Expression. Retrieved from http://www.beaconforfreedom.org/liste.html?tid=415&art_id=475

Rickman, W. (2010). A study of self-censorship by school librarians. *School Library Research*, 13. Retrieved from http://www.ala.org/aasl/sites/ala.org.aasl/files/content/aaslpubsandjournals/slr/vol13/SLR_StudyofSelf-Censorship_V13.pdf

Rosaldo, R. (1981). The cultural impact of the printed word: A review article. *Comparative Studies in Society and History*, 23(3), 508–513.

Statistica. (2017). Number of social network users worldwide from 2010 to 2021 (in billions). Retrieved from https://www.statista.com/statistics/278414/number-of-worldwide-social-network-users

Tinker v. Des Moines Independent Community School District, 393 US 503 (1969).

Vivanco, L., & Rhodes, D. (2016). U of C tells incoming freshmen it does not support "trigger warnings" or "safe spaces." *Chicago Tribune*, Aug. 25, 2016, Retrieved from http://www.chicagotribune.com/news/local/breaking/ct-university-of-chicago-safe-spaces-letter-met-20160825-story.html

Wilke, J. (2013). Censorship and freedom of the press [English version]. European History Online (EGO), published by the Leibniz Institute of European History (IEG). Retrieved from http://ieg-ego.eu/en/threads/european-media/censorship-and-freedom-of-the-press/juergen-wilke-censorship-and-freedom-of-the-press#InsertNoteID_2

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