

April 17, 2025

Dear Buffy,

Thank you for the invitation to contribute to your work on school improvement and learner attainment.

I have outlined in brief some initial thoughts below. I would be happy to discuss these further with the committee in due course, should the opportunity arise.

Best wishes

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- With regards to school improvement arrangements, there needs to be a clearer articulation of what school improvement (SI) is and for. There is general consensus within the academic community that SI should be school-led and involve the rigorous use of data to evaluate progress (Potter et al. 2002; Schildkamp, 2019). Furthermore, SI should be seen as a continuous and long-term process, rather than a specific one-off or carefully orchestrated ‘event’ (Koh et al. 2023). In this respect, it is useful to consider SI as a journey; and one that *all* schools are on, regardless of context or strength relative to others. Currently, there is congruence between the Welsh Government’s (2024a) and Estyn’s (2023) view of SI, which they describe as being focussed on helping schools to give learners the best possible learning experiences and outcomes. This is helpful, as it provides clarity to schools that learners sit at the heart of the SI agenda. However, it is not immediately clear what constitutes SI at a practical level, and indeed, how SI itself can be independently verified and/or assessed. SI is often interpreted as something of an abstract idea, particularly when its parameters or expectations are not clearly defined. This gives rise to confusion and misinterpretation; we must avoid a situation in which schools feel they are engaging in purposeful SI activity, when in reality, they are doing little more than treading water. This implies that strong, independent advice will be required and made available to all schools as a matter of course (this happens now, through designated school improvement advisors, but consistency of messaging and quality of support is considered variable).
- It is also important to reflect on Wales’ recent history in relation to SI, and the somewhat negative connotations deriving from a more openly punitive policy environment (Evans, 2022). For example, in the early to mid-2010s SI was part of a broad suite of policy levers designed to ‘raise standards’, boost attainment and elevate Wales’ standing in international comparators. There has been a considerable shift in the policy, and by extension, political narrative in the intervening decade, which has

to some extent repositioned SI as being more collaborative and less threatening. The temperature of accountability has been reduced, and there is promise of more ‘carrot’ than ‘stick’ (as evidenced by a softening of approach to inspection). It is important that this shift in approach is properly communicated to the school system, and that schools understand SI as something developmental (and, ultimately, helpful) and not so obviously associated with accountability and the threat of repercussion. Similarly, it should be acknowledged that a good number of schools are already making positive strides forward, both in terms of their curriculum development and more generic pedagogical innovations, and are not therefore starting from a position of weakness. Seeing every school as being on their own improvement journey is important in this regard.

- The new School Improvement Partnership Programme (SIPP) has been announced (Neagle, 2025) and will replace the national model for regional working (Welsh Government, 2015), as you are no doubt aware. The new approach will see a reallocation of funding across the ‘middle-tier’, and to schools, and put more emphasis on local authorities to work together in partnership with schools to drive SI. On the one hand, this is good news, in that it should negate unnecessary duplication in the middle-tier (most notably between regional consortia and local authorities) and reposition schools – and teachers – as being central to the school SI process. However, on the other hand, this could lead to further inconsistencies in messaging and delivery, with the net result being many more variations on a theme (Wales effectively moving from four consortia to an as yet unknown number of ‘partnerships’). As with schools, there are distinctions between local authority areas that prevent the adoption of one, universal approach to support in the middle-tier. Nevertheless, it is essential that partners in the new SIPP agree on aspects of delivery, operations and funding that are consistent across all to ensure an acceptable level of provision and mutual access to services. In other words, no school, teacher or learner should be disadvantaged by geography. It is a point seemingly acknowledged by Kirsty Williams (2024), chair of the National Coherence Group (NCG), established to support the delivery of SI arrangements:

‘Recognising that responsibility for school improvement lies with each local authority, we acknowledge the need for flexibility in how the proposals are implemented in local areas. However, there should be a focus on ensuring clarity about the outcomes that are expected from this process.’

This commitment to ensuring clarity should not be understated, and must form the basis of ongoing discussions related to the SIPP.

- ‘Collective responsibility’ is a central tenet of the SIPP, and requires that school leaders and their governing bodies ‘should feel collectively responsible for improving learning in other schools/settings’ (Welsh Government, 2024b). This is a noble ambition, and plays into the underlying motivation of educators to do the best by all children, regardless of who they are or where they come from. However, it is important to bear in mind that not all schools will be in a position to support other

schools; and in some cases, schools' attention will be rightly focussed on their own improvement journeys. For example, schools causing concern and/or in more intensive monitoring will require additional support and, potentially, external intervention that could preclude them from collaborating in a more formal way with others (at least for a given period of time). As such, the capacity of schools to collaborate meaningfully should be properly considered and the new SIPP model should allow scope for adaptation based on individual school circumstance.

- The perceived misalignment between qualifications (GCSEs and A-levels, specifically) and curriculum remains problematic, and can be considered an ongoing hindrance to curriculum development. A new suite of national qualifications for 14 to 16-year-olds will be introduced from September 2025, with first award in summer 2027. However, there is some concern within the teaching profession that the qualifications, whilst 'made-in-Wales' and more in tune with the developing curriculum (Qualifications Wales, 2025), remain too content-heavy and prescriptive, and thus restricting rather than empowering teacher agency. Particularly relevant in this context is the experience of Scotland, whose curriculum (similar to Curriculum for Wales in design and conceptualisation) has been severely hampered by the 'backwash' from the secondary stage into primary schools, where 'concerns about readiness for subject choice and examination success' have shaped parents' and teachers' perception of what learners should be doing earlier in their education (OECD, 2021). That is not to say that clearly-defined and specified qualifications are a bad thing, necessarily, more that they are not in keeping with more teacher-led curriculum design and development; in fact, it could be argued that they are diametrically opposed.
- The Welsh Government appears confident that the new Curriculum for Wales will contribute to a narrowing of the long-held and stubbornly fixed attainment gap between pupils from disadvantaged backgrounds and their more affluent peers (Welsh Government, 2021). 'Closing the gap' remains a key educational priority for the Welsh Government and its education secretary (Neagle, 2024). However, there remains considerable concern that adoption of a new prescription-lite curriculum that encourages the development of more localised curricula could in fact contribute to a *widening* of the attainment gap, by limiting the opportunities some children have to learn new knowledge and skills (BBC Wales, 2019; Taylor et al. 2020; Evans, 2021). At its most basic level, it cannot be assumed that pupils from more deprived backgrounds will have access to and benefit from the same resources, technologies or parental support as their more affluent peers, and so ensuring schools provide access to 'powerful knowledge' (Young, 2009) – knowledge that, in simple terms, is empowering and enriching and not typically accessible at home – is considered one way of levelling the playing field. The reluctance of Welsh policymakers to promote a canonical knowledge base, as an extension of the high-level conceptual model that exists currently, has exacerbated unease amongst those for whom subsidiarity is a pathway to further imbalance (Evans, 2023). That is not to suggest that the reintroduction of prescriptive content is guaranteed to resolve the situation; one is acutely mindful that decisions regarding what to include in a core canon will be

heavily influenced by the lens through which those chosen to decide see the world (and so some perspectives will be accommodated, others not). And therein lies the curriculum's foremost tension; how to respect the nuance of school context, whilst at the same time guaranteeing a level of consistency from one setting to the next. With this in mind, the Welsh Government needs to make clear how it intends to mitigate against the potential for increased subsidiarity to impact negatively on particular cohorts; as yet, it has not made a persuasive enough case in this regard.

- Related to this, the potential for variation and/or contradiction in what children and young people learn, dependent on where they live and study in Wales, should be fully explored – and with it, the notion of a ‘core curriculum’ involving so-called ‘powerful knowledge’ to which all pupils should be given introduction as a matter of course. The balance between prescription and teacher agency is finely trodden, and the flexibility afforded by broad expectations for learning both a gift and a burden (Sinnema et al. 2020). At very least, practitioners require clearer direction as to what leeway they will be afforded when selecting preferred curriculum content and schemes of working. At the moment, these significant decisions are very much open to individual interpretation – and discussion should be had regarding the extent to which pupils will be allowed to learn different things, and to what end. In short, teachers need to know what tolerance is available; this in turn will give teachers greater confidence to innovate and develop their curricula in a way that has fidelity to the original vision (Donaldson, 2015).
- A review of school spending in Wales, published in 2020, revealed a 6% real-terms fall in education spending per learner over the preceding decade, with extra funding for schools serving deprived communities significantly lower in Wales than in neighbouring England (Sibieta, 2020). Audit Wales, the body responsible for overseeing public finances, has since warned that direct spending on the curriculum may be at the high end, or more than, the Welsh Government's 2021 estimates and that there will be ‘significant opportunity costs to schools until at least March 2026’ (Audit Wales, 2022). It laid bare in its own review of Curriculum for Wales expenditure that the Welsh Government had not assessed the likely costs when it first set out on its journey of curriculum reform. Both reports warned of the ongoing influence of the COVID-19 pandemic on school funding. More recently, in October 2023, Welsh ministers announced a £74m reduction in education spending for 2023–2024 as part of a wider efficiency review triggered by high inflation and increased public sector pay (Welsh Government, 2023). Wales' challenging budgetary context feels all the more significant, given the well-documented detrimental impact of the global financial crisis on Scotland's Curriculum for Excellence roll-out from 2010 (Donaldson, 2014; Livingston, 2012). Whilst no doubt hamstrung by events, the Scottish experience serves as a salutary reminder that reform of this nature and on this scale cannot be done on the cheap. And so in Wales, the issue is not so much the cultural or discursive environment in which teachers work, as the day-to-day functionality of the environment itself, with schools having to manage curriculum design, and protect the time and space needed to undertake such activity, against the backdrop of a challenging fiscal climate. An uplift of £114m in-year education funding for 2024–25 and a further £111.5m for 2025–26, announced in December 2024 (Welsh Government, 2024c), is to be welcomed and recognises the financial burden facing schools, but unions have warned that the additional funding does not go

far enough (Doel, 2025; Fitzpatrick, 2024). In my experience of working with schools, the successful roll-out of Curriculum for Wales is being directly impeded by a scarcity of resource that endangers not only curriculum realisation in a more practical sense but also the motivation and goodwill of teachers to make it work. It is not that they do not *want* to engage in curriculum reform, more that they feel they cannot do it justice.

- Finally, the role of the inspectorate in maintaining standards of education in Wales should not be overlooked. In his paper on the future of inspection in England post-Covid, Richards (2020) likens the role of the inspector to that of the theatre critic; while critics judge how far the performance reflects the content and intentions of the play text, inspectors comment on the rationale and implementation of the ‘text’ of the curriculum. The difficulty in Wales, of course, is that the so-called ‘text’ is much more open to interpretation under the new Curriculum for Wales. Like theatre criticism, inspection is a value-laden exercise that involves observation and discussion at a particular moment in time. This raises two important questions; firstly, with fewer benchmarks of performance (owing largely to a less-descriptive curriculum framework) and more high-level assessment criteria, how can one be sure that inspectors make comparable judgements? And second, to what extent is the professional learning available to inspectors analogous with that being given to teachers? It is well-documented that practice in schools is driven, to varying degrees, by Estyn’s common inspection framework and what it considers to be something akin to best or acceptable practice (Evans, 2025). It is important, therefore, that the inspectorate and those responsible for curriculum development – most obviously in government, but at all levels ideally – work in lockstep and have a shared understanding of what Curriculum for Wales means for schools.

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