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A common policy theme across education jurisdictions is the need to improve student achievement and outcomes to bring greater equality, despite evidence showing the opposite to be true (OECD 2012). The quest to bring about systemic improvement to both raise achievement and increase equality has led to a significant tension in many education systems.

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5 6 Systems of Education Governance and Cultures of Justice in Ireland, Scotland and Pakistan

Fiona King, Christine Forde, Jamila Razzaq and Deirdre Torrance

Introduction: Education Governance and Cultures of Justice

- 9 A common policy theme across education jurisdictions is the need to
- improve student achievement and outcomes to bring greater equality,
- despite evidence showing the opposite to be true (OECD 2012). The
- quest to bring about systemic improvement to both raise achievement
- and increase equality has led to a significant tension in many education
- systems. According to Hudson (2007, p. 269):
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the state is faced with a conundrum; it needs to control education, but its means of regulation must not constrain the potential for finding new ways of meeting or adapting to increasingly diverse and changeable societies and problems.

In these efforts to realise policy ambitions to improve learner outcomes, increasing attention is being paid to systems of education governance. Governance refers to the ways in which an education system is regulated: the processes and structures which set direction through policy and hold to account those charged with enacting policy (Bache 2003). The state oversees the provision of education through a range of networks and providers including local government, commercial or charitable bodies, monitoring performance through data (Grek 2008). Governance moves through the different levels of a system—the macro (central government), meso (local councils, agencies, trusts, boards of management) and micro (school and school leaders). In contexts where education policy is dynamic and at times even volatile there is an ever-evolving set of relationships between these various levels, what Bache (2003) terms multilevel governance. The recent OECD's (2015a, p. 16) study of governance in complex systems notes that 'ministries of education remain responsible for ensuring high-quality, efficient, equitable and innovative education'. This raises the question about how ideas of social justice and equality inform the systems of governance within education in different nations. The increased attention placed on governance might suggest that governments are relinquishing control of education: particularly where the corporate sector has an expanding role, or where there is growing devolved local decision-making. However, Hudson (2007) disputes that this trend represents a retreat on the part of the nation-state from its role in education but rather that governance represents new forms of state regulation. Ball (2008) writing specifically about English education argues similarly that governance is not a reduction of the role of the state since the complex networks of policy actors it consists of, exert centralised influence. This move to governance is marked by 'soft governance' (Hudson 2007), a focus on outputs and the processes of self-monitoring against external criteria, with benchmarks measuring performance at every level of decision-making.

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International benchmarks, monitoring and comparing national performance, are a major tool of governance systems.

International benchmarks, 'knowledge-based regulation tools' (Rinne and Ozga 2013), are increasingly used by governments to judge systems-level performance. The Programme for International Student Assessment (PISA) (OECD 2015b) is a key policy tool for member states including Scotland and Ireland. However, other supranational organisations such as UNESCO gather and publish information about national systems, including statistics on enrolment, completion of education and literacy rates—significant issues in many developing education systems (UNESCO 2015). At one level, such tools potentially bring to the fore issues of social justice and (in)equality. For example, patterns in non-enrolment, levels of literacy or attainment, can distinguish significant inequities. Pupil performance on standardised tests can reveal inequities between the achievement of different groups of learners. Conversely, in the drive to identify 'successful' systems and 'improving' systems, the focus on comparative statistical data can lead to a narrowing of education policy and its regulation. Instead of attention being paid to the conditions of learning and the barriers to learning experienced by diverse groups of learners, policy strategies are shaped to meet less complex measures of system improvement. How such tensions are reconciled in contrasting international contexts provides thought-provoking insights.

The Case Studies

This chapter compares the cultures of justice in education governance 73 within three systems: Ireland, Scotland and Pakistan. These systems pro-74 vide interesting points of similarity and contrast. Though Ireland and 75 Scotland are developed economies, the economic downturn of 2008 76 has led to financial constraints, while Pakistan is viewed as an emerging economy. Both Ireland and Pakistan have developed from the colo-78 nial occupation in the twentieth century to being independent states. 79 Scotland has an element of devolved government with the establish-80 ment of the Scottish Parliament. There is a significant contrast between 81 Pakistan as a large country with a population of approximately 200 82

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million, while both Scotland and Ireland are small states with pop-83 ulations of approximately 5.5 million and 4.5 million respectively. 84 Nevertheless, education is central to economic policy in each state. 85 Side by side with the imperative for economic growth, exists the place 86 of education socially and culturally. In Ireland historically, Roman Catholicism has been the dominant religion, in Scotland historically 88 Protestantism occupied this position and in Pakistan, Islam is the dom-89 inant religion. Consequently, there are some interesting parallels about 90 the relationship between religion, culture and education particularly 91 addressing increasing pupil diversity. 92

Given the increasing focus on governance to set direction and monitor performance, this comparative study is based on three case studies of key policy texts related to regulation and accountability. A diverse range of documents was used, selected on the basis of their current significance within the particular system:

- For Ireland, the main policy documents were the Action Plans for Education 2017 and 2018 (DES 2017, 2018) which emanated from *Education Action Plan* 2016–2019 (DES 2016a).
- For Scotland, it was policy documents for reforms to education governance and improvement (SG 2016a, b, 2017a, b, c).
- For Pakistan, the government owned policy documents such as 103 the National Education Policy (GoP 2009, 2010, 2016, 2017), the 104 Constitution of Pakistan, and the National Education Management 105 Information Service-Academy of Education Planning and Management 106 (NEMIS-AEPAM) 2017 report, were used as sources. In addition, some 107 research papers, two UN reports: the UN Development Programmes 108 (UN 2016) and the UN Women Annual Report (Zaidi et al. 2016) 109 were used to substantiate the analysis. 110

A set of research questions was developed at the outset:

- What are the main wider societal issues around equality and social justice?
- How, if at all, are the concepts of 'equality' and 'social justice' constructed in policies?
- How are decisions made for education—the structures of governance?

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• Within the systems of governance, for what are school leaders held accountable and how do these relate to issues of equality and social justice?

• How are these accountabilities articulated and to whom do school leaders need to account?

The set of documents for each system was analysed identifying key themes (Miles and Huberman 1994). From this examination the data was reduced through the generation of short summaries presented below. A further stage of analysis was undertaken where the summaries from each case study were reviewed to identify some overarching themes.

Issues of Equality and Social Justice

The increasing significance of knowledge-based regulation tools (Rinne and Ozga 2013) reflects the globalisation of education policies and reform strategies. However, the issues to be addressed in terms of equality and social justice within an education system are deeply contextualised. To consider the relationship between systems of education governance and cultures of justice, we need to consider the socio-political backdrop.

Ireland

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Ireland has experienced significant immigration in recent years, espe-136 cially from the UK, Brazil and Poland (CSO 2016). Fears around 137 increasing immigration continue in light of the ongoing uncertainty 138 about Brexit with many individuals and companies relocating to 139 Dublin, thus adding to the existing crisis around housing and home-140 lessness. This increased diversity has resulted in the Department of 141 Education and Skills (DES) looking at the issue of meeting 'parental 142 demand for patronage diversity' (DES 2017, p. 46) in a system where 143 over 96% of primary schools are under Catholic patronage. However, 144

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despite evidence of parental desire for choice from the school patronage survey in 2012 and 2013 and parents' constitutional rights for choice (Article 42.3), little progress has been made (O'Leary 2018). Minister Brunton recently stated that the government was not in a financial position to build additional schools. However, *Action Plan 2018* (DES 2018) aims to 'agree detailed arrangements for the transfer of patronage of schools, following consultation' (DES 2018, p. 52). O'Leary (2018) has suggested that given the issues related to historic abuse, on moral grounds the Roman Catholic Church should hand over vacant school buildings to non-denominational/multi-denominational schools.

Action Plan 2017's goal is 'to improve the educational outcomes of learners at risk of educational disadvantage or learners with special educational needs' (DES 2017, p. 29). It introduced a new Special Education Needs allocation model, and a new Inclusion Support Service for schools that will be reviewed in 2018. Action Plan 2018 acknowledges increased school retention and attendance figures, 'a narrowing of the gap between DEIS [Delivering Equality of Opportunity in Schools] and non-DEIS schools in areas including standards of literacy', along with some evincing improvement in the progression to higher education of students who come to education at a disadvantage and/or have special education needs. Action Plan 2018, reflecting the Programme for Government, argues that 'education is the key to giving each child an equal opportunity in life' (DES 2018, p. 8) and looks to 'tackling disadvantages and strengthening inclusion'. However, it still falls short in recognising an intersectionality perspective (Lumby and Coleman 2016) which would consider issues of poverty and homelessness and their impact on outcomes for learners at risk of educational disadvantage or learners with special educational needs.

Scotland

There are several issues in relation to social justice and equality in Scotland. Like many developed economies, Scotland has experienced multiple waves of immigration; since the early 1960s from areas of the Commonwealth, more recently from Eastern Europe and the

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Middle East. The historical sectarianism between immigrant Catholic communities and the Protestant Scottish communities remains a significant socio-political concern, side by side with the integration of diverse newly arrived communities. However, the focus of the current Scottish Government (SG) policy is on poverty: 'Our vision for education is to close the unacceptable gap in attainment between our least and most disadvantaged children and to raise attainment for all' (SG 2017a). UK wide legislation (PofUK 2010) identifies protected characteristics including gender, ethnicity, faith, disability and sexuality. However, the intersection of such factors with poverty is not included. Advantage and disadvantage is situated largely in economic and material terms and so complex issues raised by the increasing diversity of pupil populations can be overlooked in target setting to reduce a 'poverty-related attainment gap' (SG 2017a, p. 9). Moreover, there is limited discussion around the lived experiences of minority and marginalised communities, including barriers to effective learning and achievement.

Pakistan

The issues of social justice and equality in Pakistan are linked with a widespread incidence of poverty, insufficient basic infrastructure and inadequate access to social services for the low-income groups more generally, and people living in remote geographic locations particularly. Where access to quality social services is determined by positioning in socio-economic strata and urban–rural divide, the dynamics of gender-based inequity add another lens to framing social justice in the country. Pakistan ranks at 147 on the Human Development Index and 130 on the gender inequality index (UNDP 2016). Women participation in the labour force is just 26% (Zaidi et al. 2016), which puts them at the lowest rungs of both human development and poverty indicators. Among all denominators of poverty, gender disparity in education is most pervasive. This is reflected in the mean years of schooling for women, 3.7 years in comparison with 6.5 years for men alongside only 26.5% of women accessing some secondary education

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in comparison with 46.1% of men in this category (UNDP 2016).

Geographic disparity on a multidimensional poverty index ranges from

between 86.6% for rural Baluchistan to 6.3% in Urban Punjab, which

has serious implications for social justice issues in the country. Access to

and the quality of social services, especially education, is linked to these

rural-urban differentials (GoP 2016; ASER 2015).

Policy Constructions of Equality and Social Justice

Within the wider socio-political context of each education system, the interplay of history, cultures and communities gives rise to particular

issues of equality and social justice. Therefore, we need to consider how

the concepts of equality and social justice are contextualised within the

education policy.

Ireland

In Irish society in recent years there has been a growing emphasis on 225 social justice in terms of equality, anti-discrimination, poverty and 226 homelessness. Within education the words 'social justice' fail to appear 227 in many policies including the Action Plan 2018 (DES 2018). In spirit 228 it is evidenced in Towards 2016: Ten-Year Framework Social Partnership 229 Agreement 2006-2015, in terms of an investment in 'human capital' 230 with a focus on higher retention rates and enhanced academic outcomes 231 for learners from socio-economic disadvantaged areas (Department of 232 the Taoiseach 2006, p. 23). Action Plan 2018 proposes the introduc-233 tion of specific literary and numeracy targets for disadvantaged schools. 234 At a surface level, individual academic mobilisation within schools and 235 social mobility may be seen as markers for social inclusion but are argu-236 ably merely reflective of neoliberalism and perpetuating existing power 237 structures (Berkovich 2013). This is once again evident in Action Plan 238 2018 (DES 2018, p. 28): 'education and training are the key to breaking 239 the cycle of disadvantage'. Social justice issues need to be considered as 240

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socio-ecological issues (Berkovich 2013) with an emphasis on listening to the voices of those being marginalised (Skrtic 2012). Commendably the *Action Plan 2018* aims to increase diversity of learning opportunities, diversity of school types, have more collaboration with parents, communities and other government departments and talks about harnessing 'education and training to break down barriers for groups at risk of exclusion and set the benchmark for social inclusion' (p. 8). It also focuses on initiatives in DEIS schools to promote student well-being and resilience. However, it arguably still falls short in terms of understanding how social justice, in the context of a broader definition of disadvantage and social inclusion, is understood within an educational context and how this understanding informs policy development at the macro level and in turn policy enactment at the meso and micro levels.

Scotland

The concepts of equity and excellence are central to current Scottish educational policy. Arnott and Ozga (2016, p. 253) argue that the Scottish Nationalist Party's education policy 'works to mobilise a narrative of a "journey to independence" drawing on historically embedded themes and myths about fairness' particularly the democratic traditions of Scottish education. Torrance and Forde (2017) depict the way in which a discourse related to 'all learners' runs through the levels of decision-making, accountability frameworks and policy guidelines. In these documents there is the constant use of positive language with the constructs of discrimination, marginalisation and prejudice not forming part of a policy discourse. Successive reports and performance data on attainment instead underline the continued underachievement of pupils from poor and marginalised communities. Notwithstanding a strong policy discourse around 'excellence' and 'equity', the underpinning concepts relate to the need to drive economic development and to address a 'poverty-related attainment gap' (SG 2017c, p. 3). The measure used for determining disadvantage is the Scottish Index of Multiple Deprivation (SIMD) where localities are rated (SG 2016b) using indicators including parental income, rate and type of employment, pupil

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performance, availability of services including sports, shops and leisure facilities. Although empowerment is a keynote of the current reforms to support local decisions to meet local circumstances, improvement is judged predominantly on the government-mandated target of closing the attainment gap.

Pakistan

The national education policy of Pakistan sets out to achieve 20 goals, including universal access to all children in the age range of 5-16 years by 2020, and the 'provision of standardised facilities and services by removing all kinds of disparities, inequities and imbalances including gender disparities and geographical imbalances' (GoP 2017, p. 11). This statement affirms the existence of gender and geography related disparities, but falls short of acknowledging huge disparities due to the fourtier parallel education systems: Madrassas (Religious Schools), Private Schools (English and Urdu), Public Schools and Army Public schools (Andrabi et al. 2005; Lall 2009; Rahman 2005). The quality of teaching and learning process and its evaluation; qualifications, skills and work conditions of teachers; the curriculum; and concepts of citizenship promoted among all learners vary significantly across these four systems. The system has generally failed to unleash the potential of millions of learners where only about 49% of grade 5 students can read a sentence in English; about half of them being able to compute a 2-digit division (ASER Pakistan 2015). Another facet of structural inequity is the language of instruction in different systems and its implications for employment opportunities. English is the standard language of communication in a prestigious job market including the civil services of Pakistan, multinational companies, international organisations and the corporate sector of Pakistan. English is not the language of instruction in public system schools, low fee private schools or madrassah, while high-end private schools focus on developing English language skills. This structural issue results in differentials in career aspirations, confidence and success in acquiring prestigious jobs among young people coming from these various systems.

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Structures of Governance and Decision-Making in Education

The structures of governance are crucial in shaping decision-making at the different levels of an education system. The International School Leadership Development Network (ISLDN) framework of macro, meso and micro levels is used to identify the decision-making processes and the relationships between the different sites of decision-making in a system.

Ireland

Ireland continues to emerge from a severe economic crisis which 316 began in 2007, with the knowledge economy promulgated as the pan-317 acea and so the 'perfect storm' (Conway and Murphy 2013) resulted 318 in an education system with 'new vocabularies of practice' arguably 319 reflective of neoliberalism (Ball 2016, p. 1050). Action Plan 2018 320 includes numerous targets related to performance in PISA. The strive 321 for equity and excellence (Chapman et al. 2011) or 'a stronger econ-322 omy and a fairer society' (DES 2017, p. 6) is a challenge at all levels 323 of the system with a somewhat oversimplified perspective of narrow-324 ing the attainment gap seen as the way forward (DES 2011). This 325 is further compounded by a complex educational system with cen-326 tralised policy making by the DES at the macro level and notable 327 decentralisation of provision at the meso level by a number of sup-328 port agencies, the Teaching Council and Inspectorate who operate in 329 different ways, thus resulting in tensions (Forde et al. 2017). Despite 330 this, at the primary level decision-making is largely the responsibil-331 ity of individual school Boards of Management (BOMs) or trusts. 332 At the secondary level, there are a number of Educational Training 333 Boards (ETBs) which act as a meso layer for some schools. All pub-334 lically funded schools annually report achievement scores in literacy 335 and numeracy to the DES who are setting new targets up to 2020 in 336 this area (DES 2017). 337

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Scotland

In the political context of a devolved Parliament and a nationalist government (Arnott and Ozga 2016) education is used to assert the distinctiveness of Scotland and build an economy for independence: 'The central purpose of this Government is to create a more successful country with opportunities for all of Scotland to flourish, through increasing sustainable economic growth' (SG 2016a, p. 3). However, an enduring attainment gap between pupils from advantaged and disadvantaged backgrounds has led to a sharp focus on the systems of education governance. The regulation of education currently occurs through the settled relationships connecting the three levels of macro, meso and micro. Central government initiates national policies and monitors national performance across the system; local authorities (LAs) are responsible for the provision of education within their locality, including school improvement and for ensuring schools address national policy. School leaders work to develop policy and practice to take forward national policy and are then judged on the school's performance in terms of pupil attainment and achievement, and wider school improvement. However, an OECD (2015c) review of Scottish education guestioned the relationships between and across these levels. The stated intention of the Scottish Government was to bring forward legislation in mid-2018 (SG 2017b), which would strengthen central government's direction of collaboration for improvement and alter relationships between schools and between LAs as well as between a school and their LA. The proposed legislation included the Regional Improvement Collaboratives (RICs) and the Headteacher Charter. However, following ongoing discussions with the LAs, the Minister for Education announced in June 2018 that at that point they would not progress to legislation. He indicated nevertheless that the proposals set out in the consultative paper (SG 2017b) must be implemented or legislation would be introduced to address the provisions. The LAs now work in RICs reporting to the newly formed Scottish Education Council on progress made with addressing the poverty-related attainment gap. Under the proposals, headteachers will have a duty to collaborate with other schools to foster higher achievement and address the attainment gap.

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Pakistan

Since its formation in 1947, Pakistan followed a centralised education system until April 2010 when the 18th amendment in the constitution decentralised the system of education, limited the role of the federal government, and expanded the purview of the provincial governments in the education sector. This amendment includes Article 25A, stating a 'Right to education: The state shall provide free and compulsory education to all children between the age of five to sixteen years in such manner as may be determined by law' (GoP 2010) which obligates provincial governments to ensure universal secondary education. This two-pronged responsibility for the provision of compulsory education as well as the determining and development of policy, planning, curriculum, standards and services has highlighted gaps in provincial capacity (Imran 2016). The sheer size of the educational system (44,435,753 diverse learners, 1,652,141 teachers and 267,955 existing educational institutions) is overwhelming. Though Pakistan's National Education Policy is the reference document, added challenges emanate from low funding allocations, politically motivated interference to limit socio-economic mobility, a capacity deficit and pervasive corruption in the system (GoP 2009), all make the task more daunting for ill-prepared provincial systems. Over the last seven years, provincial governments with technical and financial assistance of bilateral (UK, US, European, German, Australian Governments' aid programmes) and multilateral donors (UN, Global Partnership for Education and World Bank) have made progress on the road maps for improved teacher and school management and monitoring structures. The curriculum, textbooks and examination systems still need urgent attention at the level of provincial government. This devolution of education function from federal to provincial level is still in the process of settling down and the governance system is now working at both macro and meso levels, with federal government providing broader policy guidelines and provincial governments building governance mechanisms for their education systems respectively. Though part of the vision of provincial governments, the district level governance system and ultimately school-based management system will take some time to evolve. Thus, there is a gradual

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move from dominance of the macro level to building decision-making and regulation processes at both the meso and micro level.

Social Justice and the Accountability of School Leaders

Within each system the macro level planning process includes targets used in education regulation related to equality and social justice and these issues are variously constructed: 'poverty-related attainment gap', 'anti-discrimination, diversity, poverty and homelessness' or 'inequities and imbalances'. Therefore, we need to consider how such issues are reflected in the structures of governance and expectations placed on school leaders.

Ireland

Within the Action Plan 2018 there is little explicit evidence of what 420 school leaders are accountable for. There is an emphasis on strength-421 ening leadership through access to professional learning opportunities 422 such as coaching as well as a proposal 'for the better involvement of 423 Principals with inspection teams' (DES 2017, p. 37). Inspection is cen-424 tred on 'identifying and implementing improvements...assuring quality, 425 and providing information for parents' (p. 44) in line with the stand-426 ards set out in Looking At Our Schools (LAOS) (DES 2016b). In relation 427 to social justice and equality principals are accountable for fostering 428 'a commitment to inclusion, equality of opportunity and the holistic 429 development of each pupil' as well as managing 'challenging and com-430 plex situations in a manner that demonstrates equality, fairness and jus-431 tice' (DES 2016b, p. 12). Noteworthy also is an accountability towards 432 'pupil voice, pupil participation, and pupil leadership' (p. 12) which, if 433 executed in a meaningful way, could provide insights from marginal-434 ised voices (Skrtic 2012) towards a better and broader understanding 435 of disadvantage, special educational needs and any other marginalising 436 characteristics. 437

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Scotland

The driving political force is tackling the poverty-related attainment gap which is significantly changing the responsibilities of the headteacher exemplified in a proposed legislated Headteachers' Charter (SG 2017b). While the keynote of this suite of policies is the 'empowerment' of headteachers, schools and school communities, the extension of headteacher responsibilities bears a strong resemblance to the processes identified by Keddie (2017). A headteacher is given sufficient scope to generate strategies and make decisions to address local circumstances and is then held to account for the outcomes achieved. Specifically, in terms of social justice and equality, headteachers are being directed to close the attainment gap between advantaged and disadvantaged pupils without recognising complex and interrelating societal factors beyond their control. Further, headteachers will be held to account for the strategies and the outcomes they deliver in relation to central government's targets for closing the attainment gap (SG 2017c). Education and more specifically headteachers are to be held accountable for the entrenched failings of society at large.

Pakistan

Due to the centralised governance structure of Pakistan's public education system, initially at national and now at the provincial levels, the professional freedom at the headteacher level is quite limited. With no expectations or space for independent decisions for school-based management from the headteacher, there is no separate service cadre for this tier in the education system. Teachers achieve promotion to become heads of the institutions based on their length of service. The headteacher has no role in the selection and deployment of teachers, curriculum, textbooks to be used for each subject, school timings, enrolment targets, assessment type and frequency, student uniform and school facilities. Therefore, both in the public perception and across the education system, the head teacher is not held accountable for the quality of the teaching and learning process, or for student learning outcomes. In private schools, the headteacher is primarily accountable for responding to the expectations

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of parents and school owners. If the clientele of the school comprises 470 educated parents who are aware and interested in the quality of learning, 471 then a headteacher is held to account for ensuring this. However, in the 472 case of low fee private schools the expectations of parents can be limited 473 to the regularity of lessons, the teaching of English language and disci-474 pline in the school. Here the headteacher is responsible for maintaining 475 these basic standards. There are no state-managed regulations or stand-476 ards for the private sector schools, hence the accountability of school 477 managers is confined to the parents who pay for the services. 478

Accountability and the Exercise of Social Justice Leadership

The relationship between policy intentions related to equality and social justice and the systems of governance in each nation is crucial: these accountabilities can hinder or facilitate the exercise of headteachers' social justice leadership.

Ireland

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In Ireland, educational provision at primary level is largely publicly 486 funded (97%) despite being privately owned by patrons. However, there 487 is greater diversity in funding and governance arrangements at secondary 488 level (King and Travers 2017). Nevertheless, principals are held account-489 able for the performance and improvement of their school through 490 BOMs, Trusts and/or ETBs, along with the DES, which includes the 491 Inspectorate, and the Teaching Council. School principals are held to 492 account for the performance of their school in the following ways: 493

- whole school self-evaluation based on a quality assurance framework, Looking At Our School (DES 2016b) which includes a standard related to inclusion, equality and social justice;
- annual short self-evaluation report and school improvement plan to implement national initiatives and address curriculum areas or aspects of teaching and learning (DES 2016c); and

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• annual reporting of pupil performance on standardised school assessments for literacy and numeracy for certain class levels to parents, boards of management and the DES (DES 2012).

Scotland

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- Nationally, educational provision is largely located within the public sector (95%) and so headteachers are held accountable for the performance and improvement of their school through both the local authority (the employer) and central government, including national agencies such as Education Scotland (which includes the Inspectorate) and the General Teaching Council for Scotland. Headteachers are currently (as of 2017) accountable for the performance of their school through:
- annual school improvement plan to address national aims and priorities, notably the 'poverty-related attainment gap';
- whole school self-evaluation based on a quality assurance framework,
 How Good is Our School (Education Scotland 2015, p. 16); and
- pupil performance on school assessments and examination results,
 where pupil performance is analysed using the SIMD measurement
 of social and economic advantage and disadvantage (SG 2016b).
- The proposed Headteachers' Charter outlined above would bring significant changes to the accountabilities and the bodies to whom headteachers will have to account.

Pakistan

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In Pakistan, approximately 43% of all Pakistani students are enrolled in private schools (NEMIS-AEPAM 2017) and attract learners from mid to high-income groups (DeStefano and Moore 2010; Razzaq 2015). There is an increasing trend for private schooling in urban areas with more affluent populations. This trend has implications for social justice and equity as some private institutions charge high fees for their quality services (Andrabi et al. 2005) and the subsidised public system fails

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to provide similar levels of quality education. With the recent reforms, 529 mainly through donor-funded technical and financial assistance pro-530 grammes, provincial governments are establishing monitoring sys-531 tems for public schools and have devised school enrolment targets to 532 meet their mandate in relation to the Right to Education Act. At the 533 initial stages of this accountability mechanism, Punjab (Programme 534 Monitoring and Implementation Unit [PMIU]) and KPK (Independent 535 Monitoring Unit [IMU]) have started collecting data on mainly absen-536 teeism among teachers. In this system, the headteacher is accountable 537 for ensuring the presence of teachers though the implications of absen-538 teeism are restricted to teachers only. One aspect for which headteachers 539 are solely accountable is the enrolment into schools and ensuring the 540 maintenance of these numbers, not necessarily through retention. These 541 targets are linked with equity and are mainly focused upon ensuring 542 school-aged children attend school. However, these concerns need to be 543 connected with deeper issues of equity particularly by linking the issues 544 of retention of students with the quality of student learning outcomes. 545

Discussion: Comparing Systems of Education Governance and Cultures of Justice

Across the three education systems there are some important similarities but also significant differences and these help illuminate further issues related to social justice in education and the processes of education governance. Three key issues are: firstly, the improvement of a state education system; secondly, decentralisation and centralisation in governance structures and thirdly, the expectations placed on school leaders.

The Improvement of State Education

The improvement of state education is set within a wider socio-political and economic context. The most marked contrast is the unquestioned assumption about access to education in Scotland and Ireland, while in Pakistan remote locations, poverty and traditional cultures are

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among the barriers to access. This comparison highlights disparities in economic disadvantage between developing and developed economies and education remains an important tool to ameliorate such conditions. Common across all three systems is a policy concern to address the impact of poverty and social disadvantage on educational participation and achievement. However, while for Scotland and Ireland the issue of poverty predominates, in Pakistan a more nuanced focus helps point out the intersection of poverty with other factors, in this case gender and geographical location. This comparison also highlights existing structural inequalities related to the impact of private education on state provision. The impact of private education in Pakistan is noted but this issue does not figure in the policy imagination in Scotland and Ireland. Even in Scotland, with a very high proportion of state provision (over 95%), the private sector can have a significant impact on urban localities (Torrance and Forde 2017). The case study of Pakistan illuminates

this question of social mobility and the balance of private and public

education—a balance becoming increasingly more complex with the

growing presence of the corporate sector and philanthropic organisa-

tions. These developments will alter the structures of education govern-

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Centralisation and Decentralisation in Governance

ance and the role of school leaders.

An aspect pertinent to the question of cultures of justice in systems of governance is the degree of centralisation and decentralisation in decision-making and regulation. From the case studies, the impact of the wider socio-political context on education is compounded by the scale of the system. Potentially smaller systems might attain greater coherence between policy intentions and the structures of governance, yet, in Pakistani education coherence is more clearly evident in a centralised system. Scale intersects with the degree of centralisation in decision-making in a system. The meso level in Irish education has no local council intermediation between the national government policy direction and the schools and BOMs and Trusts that provide governance oversight of individual schools. Both Pakistan and Scotland are

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reforming their systems of governance but whereas Pakistan is looking to strengthening local decision-making, the Scottish reforms are increasing central direction. In Pakistan, the move from federal to provincial oversight is underway but requires substantial development across a large system to build a provincial system and then district and school level management. Much smaller in scale but equally complex, are reforms in Scotland. The relationships between the levels of macro (central government), meso (local authorities) and micro (schools) are being reconstructed in the current reform programme. Of particular focus is collaboration between LAs at the meso level and changing the relationship between LAs and schools where schools may have greater autonomy. These developments are principally about gaining greater policy traction in educational provision. Here the case studies highlight that the place and construction of equality and social justice in these systems of governance are important in fostering social justice leadership in schools but there are questions about the scope of local decision-making.

Empowerment and Compliance

The accountabilities of the school leader reflect systemic issues across the three nations, with increasing use of similar accountability tools. Currently in Pakistani education, the development of the teaching profession is designed to support the drive to increase engagement in education (Razzaq and Forde 2014). While there is a question of the standing of the teaching profession and the scope of their decision-making in Pakistani education, the issue of professional standing is also a question in Irish and Scottish education. Here increasingly accountability, designed to track performance against central statistical targets, is reducing the ability of headteachers and their staff to make decisions based on local circumstances and the needs of their learners.

Though the structures of governance are increasingly focused on performance against targets (which relate to external systems of measurement through supranational organisations) a common theme in Scottish and Irish education is the importance of school leaders

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engaging with pupils, parents and local communities to build inclusive practice. However, in both systems there is a tendency to present parents and communities as homogenous constituencies without any consideration of engaging with 'hard-to-reach' parents and communities to tackle educational disadvantage. The case study from Pakistan helps to illuminate the tensions where specific parent and community groups can seek to shape practice and policy in schools. Policy can provide a tool to support professional decision-making but one of the critical tasks for school leaders is then balancing the aspirations of different groups with their professional values in seeking to meet the needs of diverse groups of learners.

Conclusion

One of the questions around structures of governance and cultures of justice is the balance between centralised direction and meaningful local autonomy. Contextualised issues of social justice and equality are evident in the education policies of the three case study nations, the role of school leader in enacting policy is the focus for regulation. However, a critical issue is the way in which the professional practice of the school leader to address areas of inequalities and marginalisation is constrained or supported by education governance within a specific education system. The OECD (2015a) study identified several key elements of effective governance including the need to focus on processes and build sufficient flexibility to adapt to change; the use of constructive accountability for feedback and opportunities to trial approaches; a whole system approach where aspects align; use of research and evidence to inform practice; the need to build capacity and work through stakeholder involvement and open dialogue. This calls for a participative approach with strong connections between the different levels of macro, meso and micro and their different stakeholders, and with some form of local decision-making to address local circumstances. However, the degree to which school leaders can genuinely generate alternative approaches to bring greater equality across diverse groups of learners is curtailed by the drive to improve education against narrow measures.

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There is no doubt that issues such as poverty, of minority status, of social turbulence, of non-engagement in school education have a significant impact on the well-being and life chances of young people. However, holding school leaders accountable to address what are wider societal concerns will not resolve these issues. There is a danger therefore that systems of governance are not designed to promote the genuine participative empowerment required to enable schools and leaders to build quality relationships and work with communities to address local circumstances. Instead, school leaders are held to account in a topdown model of regulation (Shamir 2008) within an increasingly narrow focus on statistical targets including international benchmarking tools, designed to engender greater policy compliance and standardisation of practice on the part of school leaders, who in turn demand this of teachers. This is unlikely to bring about significant and lasting change for the benefit of all pupils, regardless of their background or personal circumstances. For this to become a reality, a radical rethink of cultures of justice within systems of education governance is needed. We need to move beyond policy rhetoric to greater coherence in policy, so that systems of governance are indeed imbued with a culture of social justice, where some of the complex issues are grappled with to bring about genuine improvement in the conditions of learning rather than simply meeting targets whether for attainment or for enrolment.

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