

Education in Wales since Devolution: Three Waves of Policy, and the Pressing and Reoccurring Challenge of Implementation

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ABSTRACT

On the occasion of 25 years since the advent of devolution to Wales, this article explores the three distinct waves of Welsh education policy and practice which have been identified and explored by the authors of this article and other commentators as having occurred since 1999 (Egan, 2017; Connolly, et al., 2018; Titley et al., 2020; Evans, 2022; Milton et al., 2023). It starts by tracing the early days of the devolved settlement, and the experimental approach to new policy piloted between 1999 and 2010 (Moon, 2012). It then looks at the policy turn towards greater accountability and challenge signalled in 2010 following the disappointing 2009 PISA results (Davies et al., 2018), which constituted the start of the Second Wave. It then critically examines the Third Wave of policy from around 2015, which is characterised by Wales's ambitious reform journey (OECD, 2017) embodied in the national mission for education (Welsh Government, 2017a). It proposes that Wales has, since around 2021, entered a distinctive and challenging phase within this transformative Third Wave of policy. The current situation, we argue, is characterised by uncertainty and unprecedented levels of system upheaval which have arisen from the reach, scope and the complex practical implications of implementing the post-2015 reforms. This article concludes that to realise the ambitious curriculum reform agenda it has set itself, Wales now needs

to ask searching questions about the implementation and the clarity of curricular guidance; to re-evaluate its approach to subsidiarity; and to heed the warnings from other jurisdictions where similar curriculum reforms have negatively impacted learner outcomes and exacerbated inequalities. Without this there may be implications for realising the Curriculum for Wales, teacher retention and learner experiences in Wales.

Keywords: education policy, wales, devolution, curriculum for wales

Introduction

This article evaluates twenty-five years of devolved education policymaking in Wales. It has become commonplace in the literature to think of post-devolution Welsh educational policy as being structured into three phases or waves, each of which have taken differing positions on issues such as accountability, teacher autonomy and agency, and the framing of educational standards (see Egan, 2017; Connolly, et al., 2018; Titley et al., 2020; Evans, 2022; Milton et al., 2023). Our analysis starts by tracing the early days of the devolved settlement, and the experimental approach to new policy piloted between 1999 and 2010 (Moon, 2012). It then looks at the policy turn towards greater accountability and challenge signalled in 2010 following the publication of disappointing PISA results (Davies et al., 2018), which constituted the start of the Second Wave. We then critically examine the Third Wave of policy from around 2015, which is characterised by Wales's ambitious reform journey (OECD, 2017), embodied in the 'National Mission' for education (Welsh Government, 2017a). In evaluating the current situation, we argue that it is only now, since the start of the implementation of the reform centrepiece, the Curriculum for Wales (CfW) (September 2022), that Wales's system is fully engaged in grappling with the complex implementation and sense-making in practice of the full suite of post-2015 reforms.

The First Wave: 'The Policy Laboratory'

The period immediately following the devolution of powers to Wales witnessed an intensive period of activity in the field of education, as the

newly devolved institution began exploring the policy levers at its disposal. We can point to two key guiding principles which drove policymaking in education at this stage of devolution: firstly, the period has been characterised as being a ‘policy laboratory’ (Reynolds, 2008, p. 753). There was a clear, discernible urge to pioneer new post-devolution approaches to education, employing what Evans (2022, p. 373) has called a ‘license to innovate’, so as to produce new policy solutions which reflected the needs and aspirations of Wales’s population (Jones and Roderick, 2003). On the other hand, was the stated desire of the new *Welsh Labour* administration in Cardiff Bay to differentiate itself from the Blairite *New Labour* government in Westminster through demarcating the much-quoted ‘clear red water’ between them (Morgan, 2002; Moon 2012, p. 315).

Rhodri Morgan (First Minister between 2000 and 2009), speaking retrospectively in 2010, reflected on the early devolved institutions as being legislative ‘laboratories’, testing new approaches, and bringing an infusion of new ideas to policymaking across the UK (Morgan, 2010, cited in Moon, 2012, p. 307). The (as was) Welsh Assembly Government’s overall strategy for education, outlined in *The Learning Country* (Welsh Assembly Government, 2002), was fittingly ambitious in tone, articulating a desire to develop an education system that reflected the aspirations and needs of Welsh society (Jones and Roderick 2003). The raft of policy initiatives (such as the Welsh Baccalaureate and the Foundation Phase curriculum) which emanated from the devolved government during this period were ostensibly ambitious at the level of policy discourse and rhetoric, but it has been argued that they were, in terms of their political orientation, far from radical. As Rees (2007) notes, they involved a commitment to classic universalist social democratic principles; citizen rights and obligations extended to children and young people; and the development of a partnership model between government, middle-tier arms-length bodies and various professional groups.

The Welsh Labour government was explicit in its commitment to prioritising equality of outcome over choice (Morgan, 2002), in advocating for the non-selective comprehensive school system (Welsh Assembly Government, 2002, p. 21), and in rejecting the rhetoric of choice and marketisation, which had been embraced in England in the early 1990s, and which was sustained during the New Labour years (Power, 2016; Connolly et al., 2018). The so-called Welsh ‘alternative’ (Reynolds, 2008, p. 318) that emerged during these early years further

advocated for trust in, and partnership with, the teaching profession. It also took a markedly less centralised and directive position on the issue of external accountability (Power, 2016), with the abolition of two of the most visible markers of school performance: performance tables (2001) and SATs (2004). *The Learning Country* instead proposed a more holistic appraisal of schools' effectiveness (Welsh Assembly Government, 2002), and explicitly stated that, 'the informed professional judgement of teachers, lecturers and trainers must be celebrated without prejudice to the disciplines of public accountability; and with proper regard to clearing the way to unleash the capacity and expertise of practitioners' (Welsh Assembly Government, 2002, p. 11).

This experimental First Wave ushered in a number of new policy initiatives under the umbrella of the *Learning Country*, which it stated were intended to provide a more bespoke educational system 'suited directly to the country's needs' (Welsh Assembly Government, 2002, p. 5). These included the initiation of the Welsh Baccalaureate, then envisaged as a European-style curriculum, affording breadth and cross-curricular learning; the establishment of 14–19 Learning Pathways, which aimed at creating locally-coherent study routes for young people at the key points of transition between Key Stages 3 and 4, as well as aiming for greater parity of esteem between vocational and academic qualifications (Welsh Assembly Government, 2002, p. 10). This period also saw the planning and piloting of the Foundation Phase, a learner-centred, play-based curriculum for the early years which has been termed by some as progressive (Jones, 2024). This curriculum adopted a socio-cultural and constructivist approach to experiential and play-based early learning to both engage all young children and aimed to ameliorate the impact of socio-economic disadvantage on children's educational experiences and outcomes (Maynard et al., 2013; Jones, 2024).

Initially, this experiential and child-led curriculum was welcomed by the teaching profession. However, academic research began to highlight some of the challenges and complexities in realising this curriculum in practice. An early example was a report by Siraj-Blatchford et al. (2005) which highlighted the gap in expertise and capacity required to realise the ambitions of the Foundation Phase curriculum. In addition, at this time an initially supportive press began to scrutinise the outcomes of this First Wave of policy-making, resulting in the emergence of what became a narrative of 'policy failure' and/or 'crisis' in relation to Welsh education (Rees and Taylor, 2014; Dixon 2016).

The Second Wave: 'A Complacent system?'

The OECD's 2010 publication of the 2009 PISA results for Wales could be viewed as marking the beginning of the second movement of post-devolution policymaking. Wales had fared particularly poorly in the 2009 tests, with significantly lower scores than those posted in 2006, across Reading, Mathematics and Science. One of the strategies embedded within the PISA assessment regime was to leverage systemic change in low performing countries through mediatised governance (Grey and Morris, 2022): the mechanism by which local press would agitate for policy change based on PISA-generated data. This was particularly effective in Wales, where an increasingly critical press amplified the narrative of Welsh educational failure, often ignoring the nuances or even critiques of PISA (see Rees and Taylor, 2014). This narrative was addressed and endorsed by the newly appointed Minister for Children, Education and Lifelong Learning, Leighton Andrews, whose response to this poor performance was described by some as being 'zealous' (Egan, 2016, p. 30). In a much-quoted speech delivered in early 2011, Andrews laid down a robust challenge to the sector. He stated that: 'PISA, I am afraid, is a wake-up call to a complacent system. There are no alibis and no excuses. It is evidence of systemic failure. But, as I always say, never waste a crisis' (Andrews, 2011).

While not directly criticising his predecessors, Andrews denounced the *laissez-faire* policies which were a feature of the First Wave, and was vocal in challenging what he called three 'libertarian myths' about education, that he argued had taken hold in Wales: namely, that children should allowed to develop at their own pace; that greater choice for learners would in itself drive engagement; and, that teachers should be left to teach as they saw fit (Andrews, 2014, p. 31). To varying degrees these 'myths' represented a direct challenge to some of the key assumptions implicit in the policy agenda outlined in *The Learning Country*. The policy initiatives which these challenges precipitated were, a move away from many of the key aspects of Wave One policymaking.

Andrews's 20-point plan, unveiled at his 2011 speech, proceeded to outline a bold transformation agenda which put at its core literacy, numeracy, school standards and a 'managerial' approach to external accountability (Brady, 2021, p. 26). National tests were (re)instated for literacy and numeracy from the end of Year 2, through Key Stages 2 and 3, as well as Baseline Assessments within the Foundation Phase.

Following the implementation of a National Categorisation System, schools were assigned to bands according to their performance against a range of key measures – a system which was subsequently replaced with a traffic light approach to categorisation in 2014, and which was extended to primary schools in 2015. The policy commentary around banding and categorisation maintained that it was not a return to league tables, but rather framed the new system as being a means of ensuring targeted support, rather than as a means of naming and stigmatising schools who were seen to be underperforming (Welsh Government, 2011; Connolly et al., 2018). The Welsh Government also embarked on a number of high- and middle-level structural reforms during this period, designed to support its improvement agenda, and reset the significant latitude which was afforded to the teaching profession during the First Wave. The most significant of these was the establishment of a School Standards and Delivery Unit within Welsh Government, with a remit to drive improvement, and to support and challenge the sector. Wales's twenty-two Local Authority-led school improvement services, that had been criticised for variability of quality and complacency in the face of poor standards (Andrews, 2014), were consolidated into four regional consortia, with the aim of providing more consistent and better-quality support and intervention.

One of the enduring legacies of this period of policymaking was the end of the three-jurisdiction regulatory settlement on GCSEs between Wales, England and Northern Ireland in 2013, which had been in place since 1988 (Andrews, 2014; Barrance and Elwood, 2018). Andrews had been vocal about need for reform of GCSEs, and the post-2013 specifications included less controlled assessment; were subject to greater externality; and were more purposefully aligned with the types of skills measured by PISA (Andrews, 2014; Titley et al., 2020). His reform of GCSE qualifications from 2013 opened the door to the distinctive approach to qualification governance in Wales, and arguably paved the way for the Made-for-Wales qualifications which will begin to be implemented and rolled-out from 2025 (Qualifications Wales, 2024).

The Third Wave: A 'National Mission', and a Roadmap for Welsh Reform

It was perhaps the commissioning of the independent review of the school curriculum by then Education Minister Huw Lewis in 2014,

culminating in the publication of *Successful Futures* (Donaldson, 2015), which marked the start of an intensive period of system re-modelling which has characterised the Third Wave of policymaking. The influence of the OECD on Welsh policy since devolution has been significant (Egan, 2017), with the Welsh Government having commissioned a total of five reports on the Welsh education system between 2014 and 2021. In 2014, the OECD published an analysis of the issues facing Wales's education system and assessed how well placed the nation was to respond to its own improvement agenda as set out in the Second Wave (OECD, 2014). One of the OECD's conclusions was that Wales needed a longer-term strategic plan for education, and that it had tried to move too quickly for reform to take hold (OECD, 2014, pp. 34; 116). Whilst curriculum reform was not its purpose, or among its main recommendations, the OECD report did acknowledge the Welsh curriculum review that was underway, and suggested a number of systems to which Wales might look for inspiration. It cited curriculum reforms in Norway that had provided greater autonomy for teachers and outcomes-based learning experiences for pupils (OECD, 2014, p. 47); it proposed building social capital through teacher collaboration, citing the Finnish model (OECD, 2014, p. 69); and noted that a common feature of 'high-performing' jurisdictions was greater curriculum control and pedagogical leadership for teachers (OECD, 2014, p. 71–2). In many ways, these ideas prefigured the recommendations of *Successful Futures*, and are in line with what Shapira and Priestley (2018, p. 75) term a new international 'genericism' in contemporary curriculum design, which foreground learner competences, outcomes and active pedagogies.

In addition to curriculum redesign, the next Education Minister from 2016–21, Kirsty Williams, also oversaw myriad new reforms under the umbrella of the National Mission (Welsh Government 2017a). These were intended to remodel the education system, to support the development and realisation of the new curriculum, and, crucially, provide the long-term strategic framework that the OECD had proposed in 2014 (OECD, 2014, p. 116). The reforms included revised professional standards which set out the pedagogical and leadership competences teachers and leaders should demonstrate at all career stages (including engagement with research and enquiry) (Welsh Government, 2017b). The OECD (2018) were commissioned to develop a Wales-specific blueprint for the reimagining of schools as 'learning organisations' (SLOs), based on its well-established conceptual model (Harris et al.,

2022; Welsh Government, 2018). However, it has been argued that the adoption of this SLO framework neglected to address the challenges and shortcomings of importing a model from business with limited evidence of how it might align with the Welsh professional standards for teachers and leaders (Egan et al., 2018). Kirsty Williams also took a more relaxed view on the issue of accountability within the system, compared with the approach taken during the Second Wave of policy post-2010. In 2017, she announced that as part of her reforms, accountability in education would be ‘fairer’, more ‘proportionate’ and ‘transparent’, and that the approach would be co-constructed with the profession (Evans, 2017). The National Mission itself proposed de-coupling assessment from so-called high-stakes accountability (Welsh Government 2019, pp. 39–40; Titley et al., 2020), favouring self-improving accountability based on inter-school collaboration (Welsh Government, 2017a).

The coalescence of these reforms under the umbrella of the National Mission gave them an outward appearance of being co-ordinated and complementary in nature. And, at the level of policy intention, reading across these key reform documents, there is a consistent commitment to certain principles such as curricular autonomy, teacher agency, teacher professionalism and (re)-professionalisation, research-informed practice and proportionate accountability. However, given the lack of detail and clarity of some of the reforms (discussed below) it is perhaps unsurprising that Wales seems to be experiencing a concerning ‘implementation dip’ of the kind outlined in Fullan’s model (2001, p. 5), where enthusiastic innovation, aspiration and sincere intent meet the realities of professional capacity and system readiness – largely as some in the profession have expressed uncertainty as to exactly what they are being expected to deliver (Duggan et al., 2022; Crehan 2024).

The Third Wave hits the shore: the search for clarity and coherence in implementing the vision

Since around 2021 Wales has entered a phase of uncertainty and unprecedented period of system upheaval arising from the implementation of the Third Wave. To extend the analogy, it is only now that the Third Wave of policy has hit the shore of practice, and with it the full reach of the post-2015 reforms is now becoming apparent. As noted above, the policy perspective employed during the first five years

of the Third Wave was in many respects aspirational, prospective, and therefore concerned (in post-2016 policy terms) with *co-constructing* and *road-mapping* the reform journey in the future tense. What is distinct about the current reality we propose here is that the system is now focused on, and faced with, the granular, day-to-day questions around the implementation in practice of the post-2015 agenda – most notably the CfW – described as the centrepiece of the post-2015 suite of reforms (Davies, 2025, in press). The current situation is therefore characterised by the complexity of sense-seeking and sense-making of education professionals in their respective contexts (Ball, 2011; 2012), in moving from aspirational policy intentions to on-the-ground practice. It is increasingly becoming dominated by the incremental journey faced by schools and teachers in attempting to find clarity and coherence in developing curricular content and in assessing learner progression, and now doing so within a very challenging context, both financially and in terms of dealing with the ongoing legacy of Covid-19. This stage has, by necessity, therefore, brought into sharp focus the omissions, and scarcity of detail and clarity that have arisen from the deliberately under-prescribed curriculum guidance (Crehan, 2024).

A key principle of reform since the end of the Second Wave has been to give teachers and schools greater curricular autonomy and agency, as reflected in recent guidance on CfW: ‘The Curriculum for Wales celebrates the agency and professional judgement of all practitioners’ (Welsh Government, 2024). This has arisen arguably from Donaldson’s advocacy in *Successful Futures* of a change strategy based on the principle of subsidiarity with the aim of ‘encouraging local ownership and responsibility within a clear national framework of expectation and support’ (Donaldson, 2015, p. 99). Donaldson further noted that a key challenge in exercising appropriate subsidiarity was locating ‘the right balance between central direction and local flexibility’ (Donaldson, 2015, p. 99). It is this dilemma of agreeing and setting the point at which government and the profession agree to demarcate and delegate responsibility that now requires further consideration, along with the direction of that delegation, as we argue below.

Handy (1994, p.115) argues that true subsidiarity is ‘reverse delegation – the delegation by the parts to the centre’. A key principle of subsidiarity is that power stays as close as is possible to practice, and is delegated upwards by teachers, not downwards by central government. Subsidiarity is therefore not about devolving control from the centre to the local:

indeed, the Latin term *subsidiium* translates as to provide help, aid or support. Therefore, subsidiarity is about the duty of the higher order authority (central government) to provide assistance to the lower order (schools and teachers) as it is deemed appropriate by the expressed needs of the lower order. So, in practice, this means helping schools and individual teachers do what they cannot do alone. Indeed, Newton's (2020) interrogation of understandings of subsidiarity in the CfW warns of the risk of conceptualising it as a way of decentralising governance, without devolving power.

Importantly whilst there has been much discussion about the approaches to curriculum design that teachers might adopt in the classroom to realise the CfW, there seems to have been far less consideration and co-construction of exactly what type of decision-making is best devolved and what level of national guidance should be provided. Handy's analysis of subsidiarity suggests that opportunities for 'trust and confidence' must precipitate honest conversations, and that opportunities for 'positive disagreement and argument' are fundamental to embracing subsidiarity successfully (Handy 1995 cited in Donaldson 2015, p. 99). Recent work in Wales suggests that this way of working may not currently be commonplace in school settings (Milton and Morgan, 2023) and therefore establishing trust and confidence as a bidirectional feature of educational leadership practice in Wales within, and beyond, school settings may be important going forward (Morgan et al. 2024).

This might suggest that the level of autonomy currently afforded to schools and teachers by the version of subsidiarity exercised in framing the CfW is then perhaps out of sync with the model originally proposed in *Successful Futures*:

Discussions with stakeholders suggest strongly that there is a real desire among the profession for schools and teachers to have more (but not complete) autonomy to make their own decisions within a national curriculum framework (Donaldson, 2015, p. 15).

Whilst delegating significant responsibility can enable autonomy, it can also neglect the extent to which support and guidance are needed to create the conditions for teacher to feel that they have agency and can be agentic. Indeed, it is argued here that the relationship between autonomy and agency during the Third Wave phase of policymaking is deceptively

complex, and may also be at the heart of the uncertainty and lack of confidence that some practitioners have reported in realising the curriculum (Duggan et al., 2022, p. 60). Priestley et al. (2015) make the point that autonomy and agency are distinct and nuanced terms, which, we suggest, are often mistakenly used interchangeably. Autonomy can be understood as nominally having the freedom to make professional judgements, facilitated by a comparative lack of external regulation (Priestley et al., 2015, p. 7). Agency, on the other hand, is a term which is often ‘inexact and poorly conceptualised’ (Priestley et al., 2015, p. 2). It can be defined broadly as a sense of professional control, which is largely contingent on possessing autonomy, but also it relies on a number of other key conditions. Some of these are practical and concrete (such as resource and time) and others which are conceptual and abstract (such as capacity, professional capital, professional knowledge and an enabling culture) (Hughes and Lewis, 2020). It is the precise and contextually-appropriate combination of all these conditions working together which is needed to support teachers to feel they can be agentic, which may then equip them with the ability to enact change and realise their professional values and aspirations. Priestley et al. (2015) and Daly et al. (2022) express this as having a supportive ecology around the teacher, which enables them to act with agency. So, whilst autonomy is often a pre-requisite for agency, it does not guarantee it.

A theme of recent research in Wales has been to consider the implementation of the CfW from an *emancipatory* perspective for teachers (Davies, 2025, in press). Commentators have examined how moves towards teacher-led curricula can potentially, and under the right circumstances, increase teacher agency by expanding the autonomous space within which teachers operate, thus creating the conditions for *re-professionalising* an allegedly de-professionalised workforce (Hizli Alkan and Priestley, 2018; Hughes and Lewis, 2020; Sinnema et al., 2020). Yet, in contrast, these studies have also considered the unintended consequences that may arise from inexact implementation: namely that in spite of an ostensibly well-intentioned under-prescription of content and assessment in the name of autonomy, teachers and schools could struggle with an ‘absence of specificity’ (Crehan, 2024, p. 2). The clear risk is that the almost complete delegation of curriculum development to a workforce who were never initially trained to be curriculum makers, may not all want this responsibility, and in some contexts who may lack the ecological infrastructure to support true agency, could lead to

uncertainty, divergent practice and inequality (Hizli Alkan and Priestley 2018; Hughes and Lewis, 2020; Power et al., 2020; Sinnema et al., 2020, Crehan, 2024). A recent study of teachers in Wales has pointed towards such uncertainty, anxiety, and an absence of clarity about approaches to assessment and progression, as well as a lack of confidence amongst some senior leaders and practitioners as to whether their current modes of development and delivery were truly consistent with the vision of the CfW (Duggan et al., 2022). Some practitioners in this study expressed misgivings as to whether they were ‘they were on the right track’, and spoke of needing reassurance and further support (Duggan et al., p. 60). One of the key sites of uncertainty has clearly been the contested position of knowledge in the curriculum, and a number of commentators have questioned how a purpose-led approach can guarantee a knowledge-rich curriculum (Donaldson, 2015; Hizli Alkan and Priestley 2018; Sinnema et al., 2020). Power et al. (2020) have probed the real implications for inequality of both experiences and outcomes that can arise from curricula lacking agreed corpuses of powerful knowledge (Power et al., 2020; Davies, 2025, in press). As Crehan (2024, p. 2) has recently pointed out: ‘When the curriculum contains only high-level, somewhat ambiguous statements, it leads to variation in interpretation that doesn’t only lead to differences in taught content (which needn’t be a problem), but to different standards in different schools.’

Looking forward

The implementation of the CfW will inevitably dominate the Welsh educational landscape for the foreseeable future. Consequently, to realise the ambitious curriculum reform agenda it has set itself during the Third Wave, we conclude that Wales needs now to ask searching questions about what support is needed to enable implementation. A re-evaluation is potentially needed by Welsh Government of the understanding and enactment of subsidiarity, and the importance of promoting of trust and honest conversations as advocated right at the outset of the curriculum reform process by Donaldson (2015) in *Successful Futures*. There is also a pressing need to heed the warnings emanating from other jurisdictions which have followed a similar path on curriculum reform, especially where these have impacted learner outcomes negatively and exacerbated inequalities (Shapira et al., 2023; Crehan 2024). This will also mean

taking seriously the concerns raised by practitioners in Wales about the lack of coherence and clarity of the current guidance (Duggan et al., 2022), whilst guarding against *ad hoc* and piecemeal additions. These issues, along with the most recent assessment of Wales's progress (Sibieta, 2024) are sobering, and present a clear and pointed challenge to a system undergoing seismic reform.

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