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## The Redistribution of Responsibilities in Five European Educational Systems: from global trends to national arrangements

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**ABSTRACT** This article provides a comparative analysis on the evolution of the distribution of responsibilities – the authority of deciding over a particular domain – at the national, regional, and local levels in the European Union educational systems. After explaining common trends in the institutional arrangements through the role of evaluation, the elaboration of a typology on the patterns of relations and actors' responsibilities enables research on particular evolutions and specificities in five educational systems (Portuguese, Italian, French Community of Belgium, Danish, and English) due to their particular history and institutional features. This analysis aims to contribute to the discussion on the similarities and differences on the evolution of educational systems and their policies.

### Introduction

One of the main debates in the field of education focuses on the question as to whether there is a tendency to the development of similar or identical policies across countries over time, especially given the growing interconnectedness in the context of globalisation and Europeanisation. Some studies stress the importance of global forces and the identification of common elements between educational policies; others emphasise major differences and specificities between countries due to national histories, cultures, and institutions.

It is the aim of this article to contribute to this discussion through a comparative analysis on the evolution of the distribution of responsibilities at the national, regional, and local levels in the European Union (EU) educational systems in non-tertiary education.[1] Responsibility refers to the authority of deciding over a particular domain, which can be related to personnel management, financial resources, pedagogical and organisational issues, or evaluation. The reflection on the institutional arrangements strives to identify the actors (central, regional, local governments, schools, parents, and civil society) implied in decision-making processes in specific domains and their relation. Actually, most European educational systems have known normative transformations in their organisation in the last three decades, in the context of decentralisation and school autonomy processes, that granted more responsibilities to regional or local levels over some domains. Are the similarities in the evolution of these processes among EU systems pointing to a relative convergence in the distribution of responsibilities, or do the differences and specificities between them remain more important?

The analysis pursued is based on a comparative and comprehensive approach suggested by Van Zanten and Ball (2000), which considers the interplay between various scales in the production of education policies. The intent is to identify, on the one hand, common orientations and trends at the European scale, and, on the other hand, to question to what extent the evolutions on the distribution of responsibilities at the system scale can be interpreted by those global orientations, or can respond more to historical, cultural, and institutional differences.

This issue points to the relationship between structure and agency, both in the articulation between global orientations and national arrangements, and in the study of changes in a specific educational system. Archer's classic work in educational systems' origin and evolution (1979) framed the importance of comparative and historical dimensions in the analysis of change processes: policymakers are constrained either by global orientations or by the historical, cultural, and organisational features of their systems. However, even if both global orientations (as cognitive frameworks) and the system's trajectory (as historical, cultural, and institutional constraints) condition the evolution on the distribution of responsibilities at the educational system scale, there is a relative autonomy of policymakers (Ferreira, 2005), a scope for them to decide about the direction of educational systems and policies. Thus, while recognising the permanent interaction between structure and agency as in the duality of structure theorem (Giddens, 1979/2000), we see them here as being ontologically independent so that their interdependency can be analysed, thus following Archer's realist proposal of analytical dualism (1995), which is based on the pre-existence of structure and causal power assumptions.

Accordingly, the study of the distribution of responsibilities in EU educational systems was approached in three steps: (1) identification of common orientations and trends in EU systems; (2) elaboration of a typology on the patterns of relations and actors' responsibilities in order to distinguish types of systems according to the way they similarly respond to these global orientations due to historical similarities; and (3) historical profile of one example of each type, considering the evolutions and particularities at the system scale. The analysis developed essentially relies on the elaboration of orientations, ideas, and trends at the EU level, and the influence, constraints, or impact that it might have over both national political agenda and legislation due to historical differences. A reference will be made to particular negotiations or implementations when considered crucial for the analysis of how global trends articulate with national specificities.

The indicators mobilised from international organisations [2] were the main source of the data comprised in the first two steps. In order to overcome some limitations – namely the reduction of the system's complex reality in the comparable indicators (Smith, 2008), the risk that official data (collected by national experts and related to specific legislation) might not match with the actors' practice reality, and the lack of data for some systems, or data unreliability – we used indicators from several sources so that we could both improve the database (as suggested by Duru-Bellat et al, 2004), and compare official data to principals' perceptions (through the Organisation for Economic Cooperation and Development [OECD, 2010] survey). The access to national reports and scientific researches on the subject provided a more qualitative and deeper overview on the simplified and homogenised data (Mons, 2007). This triangulation method was crucial to the interpretation of results and consideration of national contexts.

## **The Redistribution of Responsibilities in the European Union**

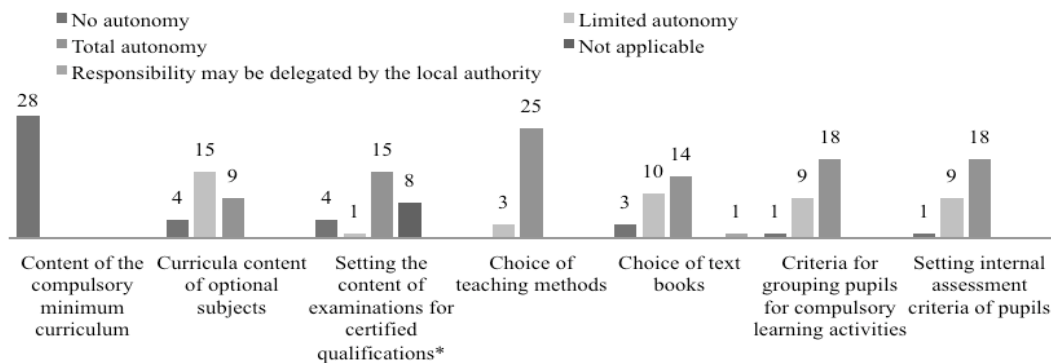
### *Global Trends: the role of evaluation*

The participation in the elaboration and influence on education policies and in the coordination of educational systems can emerge from a plurality of sources and instances. From a constructivist point of view, the regulation of educational systems implies a cognitive framework, a normative or political regulation, as well as local regulations. As argued by Van Haecht (2003), the theoretical framework and instruments of public policies are useful tools in the analysis of educational policies. Probably inspired by the referential [3] concept, Maroy mobilises the concept of models of regulation to understand the changes in the distribution of responsibilities among educational actors in European systems. The observed trends in the development of new modes of institutional regulation at the system scale – specific configurations of coordination and control mechanisms put in practice by public state action (Maroy, 2005) – are oriented essentially by two models – ideal types that can inspire changes in the modes of regulation – that replace the former bureaucratic-professional model where a conjoint regulation by state and teachers relied on the control of standardisation and rationalisation. As referentials, these (global) models participate essentially as a cognitive regulation which can influence or condition national political agendas and legislations.

The concepts of 'Evaluative State' (Neave, 1988; Broadfoot, 1996) and 'Quasi-Market' (Whitty, 1996; Maroy, 2005) are usually conveyed to synthesise the emergent models of regulation.

Both concepts refer to the role of evaluation on the redistribution of responsibilities among educational actors, a role that provides an explanation to common trends in European policies and the evolution of educational systems. The first concept refers to an evaluation a posteriori of the results, in the context of a ‘steer’ remote control by the state which defines system’s objectives and controls its quality, leaving the means to achieve goals to regional or local authorities. It is also associated to accountability which involves the development of evaluative tools and the school’s responsibility to respond via control devices (such as school inspections). Besides a similar redefinition of roles between central and local authorities, the second concept implies the adoption of mechanisms like school choice or public financing of private schools, as well as the publication of results. The role of evaluation becomes clear, then, as a ‘government-based accountability’ in the first concept, based on the inspection and monitoring of results by the central public authority, and as a ‘market accountability’ (Dumay, 2009) in the second, where school clients exert pressure on schools through their right to choose. The comparative analysis at the European level to identify common elements of observed transformations presented in this article follows Normand and Derouet’s work (2011) on Anglo-Saxon educational systems, as a reflection about the distribution of responsibilities according to the role of evaluation.

A previous analysis of the European reconfiguration of the institutional arrangements (Batista, 2012) stands up for these arguments. First, in issues related to content and teaching processes: in most systems, one sees a complete school autonomy (an improved power of decision or the responsibility of deciding) or a higher flexibility in decisions concerning organisation and teaching (retention, internal evaluation, criteria for grouping students, teaching methods, and so forth); but in few (15 out of the 28 educational systems considered), schools set the content of certification exams; and in all systems schools cannot decide about the national minimal curriculum (Figure 1).



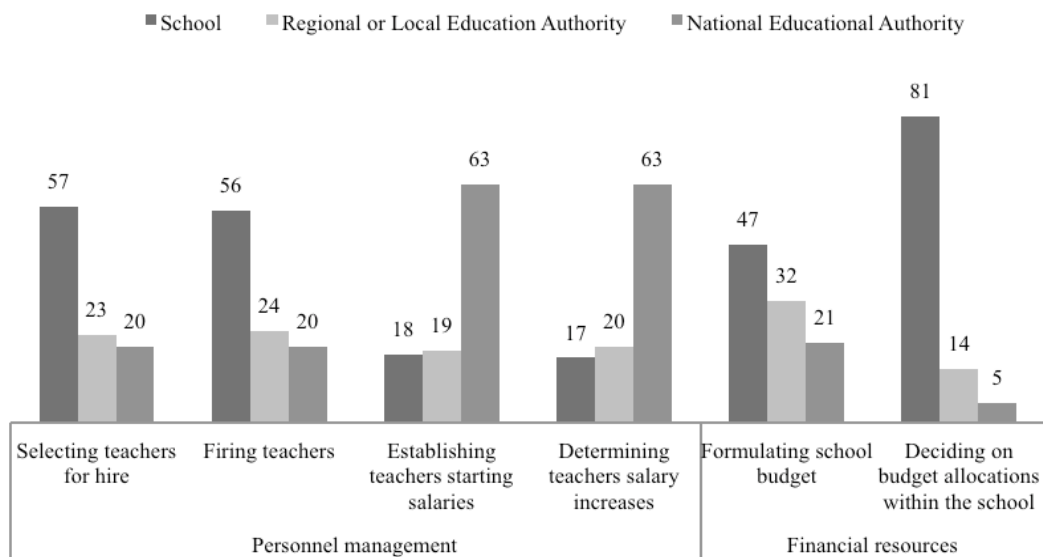
Note: Among the 27 EU countries, 28 educational systems were considered, as a distinction was made between the French and Flemish communities of Belgium.

Figure 1. School autonomy in teaching and learning, EU systems, public sector, ISCED 2-3, 2010-11.

Source: Eurydice, \*2009a, 2012.

This central control in defining the compulsory curriculum content gives room to an assessment of results while giving more flexibility to processes. Second, in the decentralisation [4] of resources and management responsibilities, the circumscription of roles between central and local authorities explained above can be partially endorsed. Local or school levels can generally select teachers to be hired or dismissed, then frequently becoming the teachers’ employers – this is clear in principals’ responses (see Figure 2), which are in line with indicators from other sources (OECD, 2008; Eurydice, 2012). The setting of starting salaries, increases in salaries, or the total amount of expenses spent on the teaching staff, as well as the assignment of their service conditions (Eurydice, 2012), are nevertheless usually central or strongly assigned and framed by superior levels. The redefinition of responsibilities usually meant also a shift of the financial resources responsibilities to local authorities, as well as to schools (OECD, 2008). Central and local authorities (or even both) usually define the total amount of expenses spent on human and material resources; schools seem to be more autonomous in managing public funds (Eurydice, 2012), especially in operating expenses and in buying computer equipment (but less in capital expenses and, as shown above, in

human resources). Thereby, principals' perceptions, as shown in Figure 2, point to not only the shared responsibilities in formulating the school budget, but to a clear predominance of schools in deciding the funds' management within the school site.



Note: The OECD report provides distributions of mean percentages of students enrolled in schools where principals report that principals, teachers, school board, regional or local education authority or national education authority have some responsibility for any area considered for each system analysed. For the 24 EU participating systems, we recoded the variable so that the three first categories were aggregated in 'school'. Then, we calculated the average for EU systems.

Figure 2. Responsibility in EU systems for financial resources and personnel management: mean distribution in EU systems on average of students enrolled in schools where principals responded that one of these authorities has these types of responsibilities.

Source: Organisation for Economic Cooperation and Development (OECD), 2010.

Finally, evaluation tools seem to have become widespread across the EU (Table I).

		n	Total	%
'Results evaluation'	National exams (1) ISCED 2	9	21	43
	National exams (1) ISCED 3	15	21	71
	Use for national monitoring (2)*	22	25	88
'Regulatory evaluation'	School inspections ISCED 2 (1)	15	22	68
	Use for national monitoring (2)	19	22	86
	Reports to local/municipal (1)	18	21	86
	Reports to regional/national (1)	20	21	95
'Market evaluation'	School choice (2)**	12	27	44
	Financial incentives for private education (1)***	9	21	43
	Publication of results (2)	11	25	44

Note: \*the use of national results of mean classification in national exams or tests; \*\*The degree of school choice indicator was recoded in order to distinguish systems where families can choose schools, even if latter public authorities can intervene in order to regulate students' flows; \*\*\*Existence of one or more financial incentives (scholarships, financial assistance, or tax credits for parents) for the fees in private schools independent of the state.

Table I. Three kinds of evaluation devices in EU educational systems.

Sources: (1) OECD, 2011; (2) Eurydice, 2012.

First, by mechanisms related to measuring 'performance', as national exams (with formal implications in the students' academic trajectory) play an increasing role as a tool for measuring and controlling education quality (Eurydice, 2009b): they are used in 15 among 21 systems

considered by the OECD (2011) in ISCED 3 (they are less common in ISCED 2).[5] The nature of these exams seems compatible with the Evaluative State model, as they are usually based on 'criterion-reference' (OECD, 2011), assessing the extent to which students have reached the goals comprised in a set of standards or national curriculum. Second, by tools pointing to a 'regulatory accountability': school inspections are common (taking place in 15 among 22 EU systems) and suit national monitoring; schools report to superior authorities in the majority of systems and show the growing responsibility of schools. Finally, still in a more discreet way, by evaluation devices that point to 'market accountability', namely in school choice in the public sector (in 12 among the 27 systems considered by Eurydice [2012]), financial incentives for private education (in few systems according to the OECD, [2011]), and in the publication of school performance results at an individual level in 11 systems.

*Global Trends and National Arrangements: for a typology*

Evaluative State and Quasi-Market models provide pertinent tools for understanding some common elements in the redistribution of responsibilities among educational actors in EU systems seized by international comparable indicators, namely on the domains decentralised or the increased diversity of actors participating in decision-making and control processes. However, they cannot completely account for the complexity of the actors' relations and responsibilities in concrete educational systems. Considering the system's relative autonomy in defining its paths or policies in relation to global orientations, there are different appropriations at the educational system level. Moreover, as recalled by Maroy (2005), there is also the constraint that comes from the systems' pre-existing situations. According to Ball (1998), the elaboration of educational policies by policymakers is a process of 'bricolage', which combines the borrowing of some fragments of foreign ideas, interpreted in local contexts and ideologies, and their adaptation to pre-existing institutional structures.

In order to articulate common elements with systems' differential responses based on their historical and institutional features, we propose a typology of patterns of relations and educational actors' responsibilities (Batista, 2012) that identifies different groups of systems which mediate similarly common orientations. The multiple configurations contrast with the classical distinction between centralised and decentralised systems (proposed by Archer, 1979), as five types are identified according to the educational actors involved in the decision-making processes, the domains over which they have responsibilities for, and their relation. The description of these five types shows how these changes are dealt with in different institutional contexts, resulting in different distributions of responsibilities.

The first type – centralised systems with limited school autonomy (e.g. France, Malta, Portugal) – refers to systems where the central government defines structures and planning in almost all of the domains; manages teachers' recruitment, placement, and dismissal; and conceives the so-called minimal compulsory curriculum, programmes, and exams content. Since the mid-1980s, these systems have started deconcentration and decentralisation processes, although the responsibilities of local authorities and schools are still limited when compared to other systems. System evaluation usually takes into account schools and teachers; national exams and schools inspections are used in national monitoring. During the past years, the geographical criterion in students' admission has become less rigid, thus promoting school choice in the public sector; private education is restricted and strongly controlled by the central government.

In predominantly centralised systems with local certification (e.g. Greece, Italy, Romania), the central government still has an important role in the organisation and management of the system, but local authorities or schools are responsible for quality control or certification. Local authorities also have some responsibilities in financial resources and/ or on personnel management, and school autonomy is more developed than in the centralised systems with limited school autonomy. The evaluation system is weak: school inspections are not required or used in the system's monitoring. There are usually some possibilities for school choice in the predominant public sector; similar to the previous group, private education is strongly controlled by the central government.

In federalised systems with importance of regions (e.g. Belgium, Germany, Spain), regions remain in the centre of educational systems, defining its rules and often managing them. Regions differ according to the system: they are *Landers*, *Comunidades Autonomas*, or *Communautés*. School autonomy deeply varies in these systems and often within its structure. Recent changes introduced elements that point to a higher centralisation, either defining national standards or imposing cooperation between regions. School inspections are generally required, though differently from national exams (when they exist, they are entirely designed and ranked regionally). Private education also strongly differs in this group of systems.

Decentralisation processes have retained central government's presence, but have given important powers to local levels (and sometimes schools) in traditional state's responsibilities in systems of collaboration between central and local levels (e.g. Denmark, Finland, Poland). Most areas are then shared, such as financial resources or personnel management. Local and school levels may set schedules, the academic school calendar, they may choose programmes and courses to be offered, or increase the time schedule for the required courses, but the central government still accurately frames pedagogical activities. In some of them, system evaluation is basically focused on local authorities' evaluation; the nature and use of national exams highly differs in these systems. In general, the private sector is restricted.

In decentralised systems with larger school autonomy (e.g. England, Hungary, Sweden), schools and/or local authorities have high responsibilities, while the central government is limited to the tasks of both regulating and controlling the system. The central government usually sets educational goals, but management tasks are delegated to local actors and often to schools with larger autonomy. The evaluation of systems generally considers schools and teachers; the results of the external evaluation are frequently published and the results of national exams are usually used for national monitoring. Private education – with a long tradition or in a rapid expansion – is financially supported.

### **The Analysis of Recent Changes in the Five Educational Systems: between global orientations and historical constraints**

The comparative analysis carried out until this point establishes the framework for the analysis of concrete educational systems, identifying, on the one hand, common orientations and trends that could work as influence or conditioning on national political agendas or legislations, and, on the other hand, grouping them in systems with a similar response to changes under the typology. The analysis on the evolution of the redistribution of responsibilities between educational actors in one system corresponding to each type (Portuguese, Italian, French Community of Belgium, Danish, and English) allows a deeper consideration of historical and institutional constraints in the development of new modes of regulation.

The historical profiles of systems will be presented one at the time when it comes to the terms of its organisational origins and the recent changes with impact on the redistribution of responsibilities between educational actors. These will be analysed finally with reference to Evaluative State and Quasi-Market models.

#### *Portuguese Educational System*

The Portuguese educational system has a long tradition of centralisation, but, since the 1980s, some legislation efforts have been made towards decentralisation and school autonomy. These efforts have been complemented by the introduction of a set of evaluative mechanisms in the last decade. The responsibilities of lower levels of the government are still limited, as the central government still has predominance over key areas of the educational system. As for the families, their choice is constrained by several criteria (in a system where the majority of students are enrolled in the public sector), although the results of national exams are systematically published, and their participation in decision-making in schools, contemplated legally, is more symbolic than real.

The strong centralised tradition dates from the beginnings of the Portuguese educational system, when the eighteenth-century first reform in education sought to substitute the church control over education for a state-centralised administration. This administrative organisation

would be maintained during the next decades and reinforced during the dictatorial regime (1926-1974) via privileged issues, such as curriculum, pedagogy, assessment, and teacher training (Mónica, 1978; Lima & Afonso, 1995). Despite the existence of autonomous experiences in schools in the post-revolutionary period (Lima, 2006), the system has remained predominantly centralised. After the ratification of the Republic Constitution (in 1976), the Ministry of Education was constituted by deconcentrated structures, though without the participation of regional or local authorities; schools were left without pedagogical, administrative, or financial autonomy (Lima & Afonso, 1995), and were managed by collegial structures.

In the early 1980s, these centralised policies and the bureaucratic apparatus were strongly criticised, and therefore the 1986 law started a new cycle of reforms, apparently under the perspective of decentralisation and school autonomy (Lima & Afonso, 1995), but the system was still marked by a strong vertical structure and centralised responsibilities. As for other systems of this type, recent changes introduced elements that show a higher decentralisation of both processes and resources, while retaining the predominance of the central government in key areas of the educational system. In Portugal, this meant, on the one hand, the growing, although still limited, responsibilities of local authorities, seen as a coordinative structure in social policies, financial management, and building maintenance. On the other hand, decentralisation was visible by the increasing importance of school autonomy in political discourses and legislation.

The 1989 'autonomy's decree' was the first normative text within a set of decrees for a new school management model, last changed in February 2012. Along with the main legislative changes that occurred, it is important to stress the transition from the concept of a 'decreed autonomy' to a 'constructed autonomy' concept (Barroso, 2005), which assumed that schools must apply for autonomy through the establishment of contracts (only developed in 2007). The school autonomy contracts may indicate a relative expression of the Evaluative State referential, insofar as it involves the setting of concrete goals and ensures school autonomy in processes and ways – promoting a regulation by remote control in the comparison between goals and results. In 2008, a new direction board, the principal, was created and directly associated to accountability issues. Earlier, in 2001, the main guidelines for a new curriculum management and learning assessment were defined, through both common curricular and goals expected to be achieved. Schools were given the opportunity to adapt the national content to their school and classes curricular project – something that was considered an important device for school autonomy to come into effect (Formosinho et al, 2010).

These decentralisation processes were accompanied by a consolidation of steering and evaluation system mechanisms. Since the 1990s, several programmes of school evaluation have been trialled (Grilo & Machado, 2009), but the actual programme of the external evaluation of schools coordinated by the General Educational Inspection (IGE) only began in 2006. External evaluation of students, abolished in the post-revolutionary period, was gradually reintroduced in the end of every cycle of education, and the results of national exams in ISCED 2 and 3 are annually published in the form of school rankings. Since 2007, teachers' evaluations have been planned, in a model that implied a differential principle between teachers and evaluation mechanisms linked to career development.

Some aspects in recent Portuguese education policies, in line with European trends, point thus to the role of evaluation in the redefinition of responsibilities between educational actors. Among the typical elements of the Evaluative State model, one may identify decentralisation processes, a new rhetoric of political discourses, and the development of evaluation instruments to the system's steering. The Quasi-Market model, albeit less obvious, is also expressed in the relaxation of the geographical criteria for assignment in a particular school, in the strengthening of legislation that promotes families' participation (through Parents' Associations or in their representation on schools management boards), and especially in the systematic publication of results. However, concrete education policies, tools, and especially the forms of implementation are constrained by a specific national history and culture of this system which remains highly centralised. Among the particularities are the advances and retreats in legislation and appropriation of school autonomy: two key areas of school autonomy, namely recruitment of teachers and financial and equipment resources, are not even contemplated in legislation (Formosinho et al, 2010); the limits of families' participation, often more symbolic than real; the special configuration of the school inspection design, which privilege responsive (Afonso, 2010) and formative (Abrantes

et al, 2010) dimensions over accountability or support to decision-making; or the difficult implementation of the teachers' evaluation model, which motivated a great number of protests.

### *Italian Educational System*

The Italian educational system has a centralised origin. The central government is still predominant in the system's organisation and regulation, despite the gradual transference of responsibilities over administrative tasks to regions, provinces, and communes, and the development in the last decade of school autonomy policies. In recent years, there have been some efforts and trial projects to overcome the lack or insufficient development of evaluation mechanisms and accountability procedures. Competition between schools increased after school autonomy policies were accompanied by the right of families to choose among public schools and the financial mechanisms available to a minority of students in independent private schools.

In order to protect the cohesion of a recently funded state (1861), strong centralisation featured in the first developments of the Italian educational system organised by the 1859 Casati Law. Since the beginnings of the twentieth century, schools passed from municipalities to the state and principals were conceived as representatives of the state and policies. During the fascist regime (1922-1945), schools were politicised (Barzano, 2009) and the entire system was changed (in 1923), reinforcing both an authoritarian control and centralisation.

Since the restoration of the democratic regime (in 1946), local and regional decentralisation contemplated in the constitution allowed the gradual transference of responsibilities over administrative tasks to regions, provinces, and communes. After a difficult parliamentary debate, a policy of school autonomy was adopted in the late 1990s, aiming to transfer financial, organisational, and functional autonomy to schools (Bracci, 2009). Since 2001, school autonomy has been constitutionally recognised, while the state has been entrusted with the setting of general standards and basic principles valuable for the whole country; regions became responsible for legislation on the subjects to be taught. In spite of this reform, the educational system remains strongly centralised (Fernandes, 2005; Bracci, 2009) as far as organisation, evaluation, allocation of financial resources, organisation of teaching, and curriculum content are concerned. Regions share legislative powers with the state and are responsible for planning the school network, constructions, training, and social service. Schools gained some responsibilities over administrative functions, but more in pedagogic and teaching organisation.

The political discourse on school autonomy reform in 2001 was linked to schools accountability, both in reference to students' and parents' needs and to superior authorities on the efficient and effective use of resources (Bracci, 2009). Regulatory accountability is based on compulsory reports to higher authorities which refer the accomplishment of norms and regulations, but do not allow a quality or performance evaluation. In fact, as for other systems of this type, Italy has few evaluation mechanisms to control the quality of education: it is essentially assured by self-evaluation procedures, but school inspections do not exist (OECD, 2011).

Only in recent years, the development of some mechanisms pointed to a higher formality and generality in evaluation procedures. National Guidelines (in 2004) and Guidelines for the Curriculum (in 2007) were defined, aiming to underline the essential performance levels that should be assured by each school, although they can adapt it to local needs. The National Institute for the Evaluation of Education, Training and Teaching (INVALSI) became responsible for developing a standardised system evaluation in order to provide national benchmarks for schools, taking into account contextual and socio-economic conditions. In 2011, the national evaluation system was restructured in order to comprise an autonomous and independent inspectorate to evaluate schools and principals. Trial projects are currently being developed in order to define a national model for the evaluation of schools and principals. National exams were also recently restructured, as in the case of the compulsory lower secondary examination whose criterion-referenced national part was introduced in 2007-08 (OECD, 2011), but contrary to the majority of EU countries, their elaboration is the responsibility of the schools (Eurydice, 2009a). The results are used for diagnosis purposes, in order to provide schools with a formative feedback, and are directly shared with school administrators and education authorities. These results are not shared with



teachers, parents, students, or the media – serving essentially the purpose of central diagnosis of the educational system and providing schools with data for their self-evaluation.

The development of these evaluation mechanisms, as well as the policies on school's autonomy, seems to be the best examples of the kind of distribution of responsibilities related to Evaluative State. The higher power of schools and regions is counterbalanced with the need for a national monitoring of performances and the definition of common guidelines to all schools. Nevertheless, the higher school autonomy and the new status of principals are not suited by appropriate structures that officially support accountability procedures, as shown in Barzano's work (2009): Italian inspectors, for example, do not perform a systematic or general control on schools, serving essentially a support or formative purpose and intervening only in cases of serious problems. The lack of implementation of a systematic and general programme for school inspections, now under study, is actually a crucial issue in the current debate on education in the country.

According to Bracci (2009), one of the impacts of school autonomy policies was to increase competition among schools as they compete for more students (something that influences their funding formula). This feature could point to aspects of the Quasi-Market model, reinforced by the right of families to choose among public schools and the financial mechanisms available to students in independent private schools. However, the publication of the results in national tests is a decision of the school; schools are not expected to submit any reports to parents (OECD, 2011).

#### *The French Community of Belgium's Educational System*

The French Community of Belgium's educational system has been marked since its beginnings by a plural and decentralised offer and the constitutional freedom for families to choose a school for their children. From the late 1990s, there have been efforts towards a greater harmonisation (in the matters of education's general goals, missions, and skills that should guide all educational programmes) among the different education networks, public or organised by private entities but with public funding, and the development of evaluation mechanisms. Respecting their relative autonomy and a 'discretion principle', however, there is no publication of results or comparisons between schools; external evaluations have mainly a formative purpose.

Being a fairly new country (it was created in 1830), Belgium's history is marked by group conflicts and compromises in a plural and 'pillared' society (Van Haecht, 2004), constituted by a large number of separate organisations that ensure their peaceful coexistence. The compromise between Catholics and seculars in education was achieved by the constitutional principle of freedom in education, that resulted in a multiple and decentralised school initiative (Delvaux & Maroy, 2009) where the authorities responsible for both proposing and implementing education (called organising powers) benefited from a strong autonomy. After some disputes, the commitment between the two parties was sealed in the Educational Pact (1959), allowing simultaneously an enlargement of public offer and the concession of large and generalised funding to all legitimised organising powers. Another crucial and perhaps deeper cleavage of Belgium's society, based on linguistic and cultural differences between Flemish and Walloons, also had its impact on education, namely in the communalisation of education (1988) through the devolution of responsibilities to three federal entities for the development of the educational systems, that thereafter differed greatly. The federal state only preserved three responsibilities: the definition of the beginning and end of compulsory education; minimal conditions for getting a certificate; and the pension scheme.

After a troubled beginning, marked by protests motivated by financial restriction measures, the different organising powers of the French Community educational system tried to find a consensus by defining, in the 'missions decree' (published in 1997), the general goals of education, the common missions, the basis of skills that should guide all educational programmes, and the guiding assessment scales. This decree officially recognised organising powers' federations, commonly called educational networks. Today, the educational system's structure mirrors the different segmentations within the Belgian society: an official education organised by the French Community and by the decentralised public powers coexists with a 'free' education organised by private entities funded by public aid, which can be confessional or not. Education policies have

always respected a 'discretion principle' (Mangez, 2011), in order to protect the networks' coexistence and organising powers' autonomy. The educational networks are the privileged actors of dialogue with the public authorities, but have a variable power – the Federation of Catholic Education, for example, coordinates the definition of programmes and the teachers' inspection of their members. Organising powers propose a strategic direction, manage financial and personnel matters, and choose school principals, but may delegate some responsibilities to schools, usually over pedagogical issues. The regional authority (the French Community) is responsible for organising education, and its main competency relies upon financial resources. Compared to other systems, it has a fairly modest role, but a particular ambiguous nature, since its importance is also due to its role as organising power itself (Dupriez & Maroy, 1999).

As for other systems of this type, recent changes introduced elements that point to a greater harmonisation. The regional authority was strengthened through the definition of skill basis in the 'mission's decree': while standardising the system, common norms open the possibility of further control of results in comparison to goals centrally defined (Van Haecht, 2004). The educational networks were reinforced, being linked from the beginning to the definition of central education policies and the system's steering with an advisory role (Mangez, 2011). Some measures of steering and evaluation were also slowly but gradually implemented. Among them, it is important to stress the creation of the Steering Commission (2002), the proliferation and consolidation of the external assessments' structure – once organised by educational networks, today replaced by common devices, sometimes mandatory – and the publication of educational indicators (2006), and the reform of the inspection service (2007).

Although the progression of Evaluative State's referential being then indisputable, the complexity of the French Community of Belgium's educational system makes its generalisation difficult. The fragmented nature of education still exists, in spite of the increase in common rules (Delvaux & Maroy, 2009) or the development of multiple spaces of dialogue and negotiation between networks (Maroy, 2000). The Quasi-Market figure, present since the beginning, could explain the particular appropriation of the new referential, since the system has always been characterised by competition between schools, though respecting their autonomous space by the 'discretion principle'.

According to Maroy (2000) and Van Haecht (2004), recent cultural and social changes highlighted the logic of the Quasi-Market model, since members of the original sociological communities became progressively similar to clients who evaluate a service more for its intrinsic quality than for its identity, thereby modifying the use of their constitutional right to choose their school. At the same time, schools developed strategic market conducts, adapting their products and services in order to maintain or increase the number of students, a fact with strong influence over their funding. Due to the high inequality and school segregation resulting from this system, some measures were introduced to regulate this Quasi-Market model, namely in students' admission, limiting school autonomy in these matters, but preserving families' freedom of choice (Delvaux & Maroy, 2009). Families, however, are not informed about the quality of schools by any publication of results or ranking of schools: respecting the particularities of this system, only a formative use is made of external evaluation of students (Dupriez, 2004), and any attempts to compare individual schools and networks or publication of results is forbidden.

#### *Danish Educational System*

In the Danish educational system, local authorities have traditionally great responsibilities in education (and also in matters of financing), and they may delegate some of these responsibilities to schools, which can result in local variations. In recent years, the decentralisation process confirmed the power of local authorities, while the state became responsible for setting principal goals and a central framework for evaluation mechanisms. Many of the changes introduced, namely those relative to the development of evaluation mechanisms (which are usually published), were motivated mainly by an effort to improve quality. The diversity of educational alternatives is in part due to the development of a financed private education with a large autonomy; families can choose among public and private sectors.

Education in Denmark was originally linked to Catholic schools, transferred to the Crown in the sixteenth century. Public popular education was limited, but started to grow throughout the following century. During the nineteenth century, when the absolute monarchy was replaced by a free constitution and a democratic regime (in 1849), compulsory education was established and the system of municipal education authorities (for public schools) and alternative free independent schools was set. The *Folkeskole* (public primary school) was formally established in 1894. After World War II, several educational reforms were made, aiming to introduce a broader and unitary national educational system: urban and rural school systems were unified (1958), and a comprehensive primary and lower secondary education was introduced (1975).

Today, the Danish public educational system is centrally managed by four different ministries and locally by the local authorities together with the school boards. Local authorities have great responsibilities in education, mainly in the primary schools, on matters such as financial issues, the approval of the school academic calendar and programmes, supervision of the internal organisation of schools, the principal's nomination (Fernandes, 2005), and staff management. Schools also have large autonomy, since they write the proposals for local authorities' approval and these local authorities can also choose whether or not to delegate powers to schools in some management areas. The school board selects teachers and decides over certain aspects or pedagogical organisation (as criteria for grouping students). In recent years, the decentralisation process aimed towards innovation and quality through the fostering of competition among schools, and the bureaucratic control was substituted by an overall target and framework management. One of the main changes was motivated by the structural reform of the municipalities in 2007 that modified both regional and local divisions in Denmark. The municipalities continued to be mainly responsible for primary education, while the state became responsible for the setting of goals on the contents of primary education.

Evaluation mechanisms were consolidated in an approach that combined a central legal framework, specification of evaluation requirements and goals, responsibility for municipalities to ensure quality control within this framework (thus possibly introducing local features and indicators), and autonomy for schools on administrative and pedagogical policies. Traditionally, the configuration of educational actors' relationships and responsibilities placed local authorities in the centre of the evaluation processes in public schools that were mainly accountable to them, whereas parent-elected boards were responsible for quality assurance in the private sector (OECD, 2011). Local authorities, as for other systems of this type, were – and are – evaluated by the central government. Since the 1990s, the central government has tried to consolidate a national structure for school accountability linked to the development of national standards and student achievement in standardised tests. Local authorities still have a central role, but the Danish Evaluation Institute, created in 1999, has to carry out national evaluations based on a sample of schools.

In the last years, there have been some attempts to systematise external school evaluation – that before differed according to the municipality – and to define common goals of education and achievement for all schools. In 2003, the National Common Objectives became mandatory by the new Act on the *Folkeskole* for compulsory education, thus framing the basis of the assessment of students. Three years later, summative assessments for students were introduced throughout ISCED 1 and 2, aiming to identify learning needs and to adapt teaching processes, and the final examination of *Folkeskole*, introduced in 1975, became mandatory (Eurydice, 2009b) – only the results of this exam are published. In 2010, the 'Professionalism and Freedom' reform proposed a balance between greater freedom for schools and the publication of results of the national tests. As for school evaluation, since 2006, the process conducted at the local level has to be focused on centrally defined indicators, and municipalities are responsible for producing annual quality reports for all primary and secondary schools under their jurisdiction and publishing them on the internet (Eurydice, 2012).

The decentralisation process and increased local autonomy in the Danish educational system points to some inherent elements of the Evaluative State: it is based on the central definition of overall targets and requirements, whereas the implementation of policies and activities are left to local authorities and schools (that can introduce local variations). The development of evaluation tools is nevertheless not only motivated by control concerns, but also necessary to provide tools for improving quality, an element that became a reason for the introduction of many changes – as an example, the summative assessments and the creation of mandatory Individual Student Plans to

document student learning. The elements of the Quasi-Market model are visible in the growing publication of results, in the strengthening of parental participation (namely by the introduction in 1991 of a new system of school boards), and in the parents' freedom to choose their children's schools. In fact, unlike other systems of this type, private education in Denmark is developed, financially supported, and largely autonomous, which grants the existence of diversity of educational alternatives. Though comprising a much lower percentage of the school population than the public system, financial vouchers are given to families in private education since the system came into existence in the democratic period.

### *English Educational System*

The English educational system has a decentralised tradition which was mainly centred in the responsibility of local authorities in the regulation and management of educational offers. The reforms undertaken in the late 1980s were characterised, on the one hand, by the establishment of a national compulsory curriculum and national assessments, and, on the other hand, by the increased power of schools (namely in school boards, with teachers, parents, and local community representatives) to the detriment of local authorities. Since the 1980s, families have had the right to choose between schools which operate in competition, which is fostered by the publication of 'league-tables' and a high-risk accountability system.

The decentralised tradition in the English educational system goes back to the nineteenth century, when education was assured by local authorities or private entities, and it was constituted by a differential and hierarchical offer between courses and establishments, operating an early selection of students (Dumay, 2009). The local autonomy was highly broad, including in matters like curriculum, funding, administrative management, and teachers and principals' recruitment (Fernandes, 2005) – elements that limited the influence of central authority.

A set of education laws in the early twentieth century established some norms to unify the turmoil that framed the educational administration (Barzano, 2009), thereby creating the local educational authorities (LEAs). The emergence of a national education system locally administrated (Dumay, 2009) remained throughout the first-half of the twentieth century. LEAs regulated the educational offer and controlled schools by local inspectors who provided essentially pedagogical counselling and support, thus relegating the central inspection service (Her Majesty's Inspectors) to a complementary role (Dumay, 2009). In the following decades, the debate on education relied upon its nature, goals, and quality, as well as on the lack of information on a system level. According to Barzano (2009), the strong corporatism that existed between LEAs and teachers was gradually replaced by the accountability idea, and education began to focus on the establishment of quality standards and costs control.

The reforms undertaken in the 1980s, particularly the Educational Act (1988), marked a new period of the English educational system. For the first time, a national compulsory curriculum, as well as national assessments of students' achievement, was implemented, pursuing a global system's evaluation (Broadfoot, 2000). School autonomy was increased by the transference of responsibilities over financial resources and personnel management to school governing boards (SGB). These SGBs nominate school principals and are constituted not only by LEAs and teachers' representatives, but also by local community and parents' representatives, thus allowing increased participation (after, in 1980, they were given the ability to choose schools within the public system). School autonomy continued to increase in the last decades, namely with the possibility of broader flexibility for certain schools in certain areas of the national curriculum (in decrees published in 2002 and 2011). This context allowed the development of a new and intensified logic of evaluation, whose results, always published, foster competition among schools and families' choice (Afonso, 2003) – for example, the famous 'league tables' that rank schools according to their classification in national exams or tests. In the 1990s, that logic became based on the reorganisation of the central service of inspection, and in the creation of a governmental department responsible for evaluating schools, the Office for Educational Standards (Ofsted). This service started systematic cycles of school inspections at the national level by teams of independent inspectors, linked to a 'high-risk' accountability (Barzano, 2009), due to their consequences (based on a system of rewards and sanctions and a school response through an improvement plan in the case of a negative evaluation).

The English educational system, in line with other systems in its group, but probably most intensely, seems then to have developed a combination of typical elements of both models of regulation identified at the European level (Dumay, 2009). The elements pointing to an Evaluative State are present at the new balance between local and central authorities: the traditional power of LEAs was weakened, on the one hand, by the increase in responsibilities of the SGB, and, on the other hand, by the reinforcement of the central government through an implementation of a national curriculum and evaluation mechanisms. An ex-post evaluation is then possible: the central government sets general goals and develops a range of devices to monitor the results of schools (Meuret et al, 2001). The recent promotion of an 'intelligent accountability' (Dumay, 2009; Normand & Derouet, 2011) through self-evaluations based on the comparison of indicators centrally defined to set improvement plans does not change the global traditional approach of accountability (Barzano, 2009).

The elements of the Quasi-Market model are in turn visible in the publication of results ('league-tables', school inspection results on the web) as a way to inform families about the quality of schools; the right of school choice promoted also by financial mechanisms; the increasing participation of families in the policies of schools, especially by their representation on school boards; and about both comparison and competition between schools.

### **Final Remarks**

Evaluation is the common element in the models of regulation which are usually mobilised to understand the processes of redistribution of responsibilities among educational actors in EU systems (Evaluative State and Quasi-Market). It explains the tendency to concentrate the definition of education's main goals and content at the central level; decentralise responsibilities over organisation and teaching to schools, and over resources and management to local or school levels; and the development of evaluation tools (national exams or tests, school inspections, or those related to a market accountability). These general trends are nevertheless developed in the context of different or even antagonistic previous situations, thus implying movements that seem contradictory: for example, in systems where the historical tradition allowed the provision of a local-based educational offer, the reinforcement of central control or harmonisation constitutes the dominant development (Afonso, 2003); in systems traditionally centralised, the drift lies in the introduction of some mechanisms that give broader responsibilities to local authorities and schools.

The typology of patterns of relations and educational actors' responsibilities presented here is the first step towards the articulation of the elements of convergence and the systems different responses based on their histories and local institution features. The historical profiles of one system of each type consider the evolutions at the system scale, with concrete legislation and instruments. This exercise allowed the identification of elements that can be interpreted by the two models of regulation presented as global orientations in each system, namely in the central definition of common goals, decentralisation, and/or school autonomy policies; the development of performance and regulatory evaluation mechanisms; and, more timidly, some elements that point to a greater school choice (see Table II). But it also made clear some systems' specificities. First of all, in the period these reforms and mechanisms were adopted and those which indicate major changes in traditional institutions, England seems to be the system where the elements in line with global trends came first (with Education Reform Act in 1988), whereas, for example, in the other four systems, the development of evaluation mechanisms was made essentially in the last decade. In systems traditionally centralised (Italy and Portugal), the policies of decentralisation and school autonomy were the focus of several legislations, particularly in the 1990s, while in Belgium (Fr.), the concern was mainly in the central definition of minimal curriculum or common goals for a decentralised offer. Table III provides a comparison on other central differences identified, namely in the actors involved in decision-making processes (central government, state, regional or local authorities, and schools) and the principal characteristics of evaluation mechanisms.

So, are these evolutions pointing to growing similarities among EU systems or do differences and specificities remain more important? In respect to the evolution in the distribution of responsibilities between educational actors, the analysis carried out in this article points to a relative convergence in the direction of these changes, specifically in the growing diversity of actors

implied in decision-making and the type of domains (de)centralised. In the five historical profiles, the concern with the distribution of responsibilities between educational actors is clear in recent evolutions, yet differences are visible in the kind of actors involved in each system and for each domain, as well as in the specificity of instruments' configurations and use.

The debate on convergence or divergence between educational systems can only be enriched by the analysis of concrete empirical examples which elucidate over timings, struggles, and specific configurations and instruments adopted, which in this matter still denote more differences than similarities across systems. This reflection may be consolidated by a study on the interplay between global and national forces in the various stages of education policy (setting the agenda, policy structuring, implementation, and results) in concrete educational systems.

	Portugal	Italy	Belgium (Fr.)	Denmark	England
Central definition of content/ common goals	National Curriculum with competencies goals expected to be achieved (2001).	National Guidelines (2004) and Guidelines for the Curriculum (2007).	Missions' Decree (1997).	National Objectives in the <i>Folkeskole</i> new Act (2003).	Education Reform Act (1988) – central control of school curriculum.
Decentralisation/ School autonomy policies	Education Law (1986); Autonomy's decree (1989); Other decrees on school management (1991-2012).	Local and Regional decentralisation contemplated in Constitution (1946); Policy of school autonomy (since 1997).	Traditional autonomy of organising powers and educational networks.	Traditional power of local authorities; School autonomy (2004).	Education Reform Act (1988) – transfer of responsibilities for financial and personnel management from local authorities to schools.
Evaluation mechanisms (performance and regulatory)	School inspections (2006); National exams in ISCED 2 (since 2005) and 3 (since 1994).	National exams restructured (2007); Efforts and trial projects for creating school inspections (ongoing).	National exams (Primary level – 2007); School inspections (2007).	Local school evaluation based on central indicators (2006); National exams mandatory (2006).	Education Reform Act (1988); National exams (ISCED 4 – 1988).
School choice and publication of results	Geographical criteria in initial assignment (but free choice of other public schools if there are places available); Tuition tax credits available for families in private schooling; Systematic publication of results.	Parents choose a school but public authorities may intervene; Tuition tax credits available for families in private schooling; Publication of whole-school results in national tests at the discretion of the school.	Traditional freedom of school choice; funded private sector.	Students are allocated to a specific school but parents may request alternative; Financed private education; Growing publication of results.	Parents choose a school but public authorities may intervene; Publication of 'league tables'.

Table II. Global trends in one example of each type.

*Redistribution of Responsibilities in Five European Educational Systems*

	Portugal	Italy	Belgium (Fr.)	Denmark	England
<i>Level(s) of government mainly responsible for ...<sup>1</sup></i>					
Planning and Structures	Central government.	Central government and schools. Schools have autonomy in setting the content of examinations for certified qualifications and credentials	State authorities (Communities).	Central government and Local authorities.	Schools and local authorities.
Personnel Management	Central government.	Central government and Regional authorities.	State authorities (Communities).	Local authorities and schools.	Schools. Local authorities or schools are responsible for employing teachers.
Resource management	Central government.	Central government and schools.	State authorities (Communities) and schools.	Schools and local authorities.	Schools.
<i>Principal characteristics of ...</i>					
National exams/certification	National exams at the end of every cycle of education devised and graded by central government.	National exams at secondary education devised and graded by central government.	National exams and assessments at primary education. Formative use of external evaluation of students.	National exams at secondary education devised and graded by central government.	National exams at upper secondary education devised and graded by central government.
Schools inspections	Highly structured, organised by central government. Privilege responsive and formative dimensions.	No school inspections, but this is a crucial issue currently being debated.	Partially structured, organised by State authorities.	Not required; local authorities must evaluate each school individually.	Highly structured, organised by the central government; High-risk accountability procedures.

<sup>1</sup>The domains are based on the OECD report (2012) and only the principal levels of government with responsibilities over each domain were identified (mainly according to the percentage of decisions taken). 'Planning and Structures' refers to decisions on the creation and closure of school or grade level, designing programmes of study, selection of programmes or subjects taught in a particular school, definition of course content, setting of qualifying examinations for a certificate of diploma, and credentialing; 'Personnel Management' refers to decisions on hiring and dismissing personnel, definition of duties and conditions of service, fixing of salary levels, and influence over careers; 'Resource Management' refers to decisions on allocation of resources.

Table III. Comparison of the principal levels of government with responsibilities in each example by domain and particularities in evaluation mechanisms.

## Notes

- [1] For comparative purposes, the International Standard Classification on Education (ISCED) of 1997 was used in this article. The main levels represented here are ISCED 1 (which corresponds to primary education), ISCED 2 (lower secondary education), and ISCED 3 (upper secondary education).
- [2] The Organisation for Economic Cooperation and Development (OECD) reports contain indicators about the distribution of responsibilities among government levels in each system (2008) and instruments of evaluation (2011) collected by teams of national experts from each country. The Programme for International Student Assessment (PISA) principals' survey (OECD, 2010) provides variables about areas and domains of distribution of responsibilities among educational actors from the principals' point of view. Finally, the Education Information Network in the European Community (Eurydice) reports (2009a, 2012) have information about areas and domains of school autonomy and accountability elaborated from the responses of national expert teams.
- [3] Set of beliefs, values, principles that structure public policy or a world vision that allows the classification of a set of problems around a central norm (Muller, 1998, cited in Van Haecht, 2003).
- [4] The term 'decentralisation' describes the process of distribution of authority, power, and resources to lower levels of decision less dependent on the state. 'Deconcentration' refers to a similar process, but to regional or local services in the state's direct administration. To avoid looking only at a territorial dimension of decentralisation – to see which level of government has more responsibilities – it is important to consider also its functional dimension (Formosinho, 2005), focusing on precisely which domains each actor has responsibilities for.
- [5] See note [1].

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