Global Education Monitoring Report Consultation: Accountability
Global Campaign for Education Response

Overview and methodology

The Global Campaign for Education is the world’s biggest civil society movement working to end the global education crisis. With a network of 112 national, regional and international members – themselves with networks of tens to hundreds of member organisations – operating in over 100 countries, GCE represents a broad base of civil society actors including NGOs, teachers’ unions, social movements, youth networks, and grassroots groups.

Following the Global Education Monitoring (GEM) report consultation regarding its proposed theme of accountability, in June 2016, GCE hosted a consultation with its members to gather responses on the different aspects proposed by the GEM report for analysis, as well as to tap into the collective experience of its members. GCE hosted this consultation online in English, French, Spanish, Portuguese, and Arabic, with responses received predominantly from GCE members in the global South.

Main considerations and findings

Holding governments to account is a core function of organised civil society, and GCE and its members have long been actively involved in many aspects of accountability processes, at different levels of government, and using a wide variety of mechanisms to do so. As such, respondents to the consultation welcomed the proposed theme of the GEM report.

Social accountability was felt to be a critical measure and additional technical support and resources should be invested in capacity-building of community leaders, teachers, students and parents, as well as CSOs to be able to play a role effectively. At the same time, significant concerns were voiced about two forms flagged in the report outline, namely (i) performance based or test-based accountability and (ii) market accountability to expand parental choice in selection of schools. The omission of the accountability of other actors (as discussed later in the report) was also regretted.

Concerns were very clear regarding the divergence between the conceptual framework proposed by the GEM report and the SDG4/Education 2030 Framework for Action. It establishes a service-client (thus private) relationship as opposed to state-peoples (thus public) accountability relationship. Emphasis is placed on accountability at the school level, effectively placing responsibility on the shoulders of teachers, without analysing the extent to which the necessary preconditions have been put in place; this again places focus on individuals, rather than systems. Accountability of education systems, which should be developed (and adequately resourced) to deliver inclusive, equitable and quality education, is critical; failing to hold the system to account for delivering these fundamental elements of SDG4 and the FFA will foster inequality in the absence of any supportive measures to help students from marginalised backgrounds, for example.

At the same time, members pointed out that the Education 2030 agenda commits States to delivering at least 12 years of free education, considering one year of pre-primary, primary and secondary, and progressively so for other levels. Although the commitment towards free education was one of the key achievements of the SDGs and the Education 2030 FFA, the concept note mentions education needing to be “affordable”: this must be removed as it is in direct contradiction to what has been approved by the United Nations, and the centrality of the Member States’ commitment to delivering free primary and secondary education must be reinforced. Some respondents raised the issue of the grave implications the approval and implementation of new international trade and service agreements will have on the right to education and other human rights. This includes the Trade in Services Agreement (TiSA), being currently negotiated in secrecy, and the Transatlantic Trade Investment Partnership (TTIP), both of which will open up public service provision to private, for-profit companies.
While the proposed framework for the report has a focus on schools and tertiary education institutions, emphasis should also be placed on ECCE, adult literacy and TVET programmes in light of their inclusion in the new SDG framework.

Returning to more specific concerns about the forms of accountability highlighted in the concept note:

a. **Concerns with performance-based accountability**
   Considerable evidence has emerged documenting the negative consequences of standardised testing. It will be important to clearly highlight the drawbacks of standardised tests – including the feasibility and desirability of achieving a single “globally comparable learning metric” given the cultural and linguistic diversity worldwide. Respondents felt that adopting an unquestioning approach towards standardised tests risks strengthening the testing industry. Increased standardised testing has been known to undermine diversity (promoting instead homogenisation), weaken commitment to collective achievements and collaboration (promoting instead individualisation and competition), promote rote learning (as opposed to critical thinking and creativity) and unfairly penalise frontline providers (teachers, instead of the government) as well as students themselves. It was felt that excessive emphasis on performance or testing reproduces false assumptions – that quality equals performance on standardised tests developed by big businesses. Any learning assessments undertaken must include assessments of both academic and non-academic performance.

b. **Market accountability**
   Several respondents pointed to the negative impact of privatisation and questioned the inclusion of market accountability as a legitimate form of accountability for delivering a fundamental right. Growing privatisation has pushed students into fee-charging schools, increasing the household costs of education. It struck respondents how far removed this approach was from the Education 2030 Agenda narrative, which was constructed through years of negotiation and consensus. The report must, therefore, examine the regulatory provisions for private education and the steps needing to be taken to strengthen their implementation. Indeed, some respondents felt that given that Member States are committed to delivering free education at primary and secondary levels, private providers – particularly for-profit providers – which charge fees at the point of use violate this core accountability to deliver free education, and should not receive any state subsidies or tax breaks. The growth in private schools itself may be considered to be a reflection of constrained choice when the public system fails to expand to cover all school-aged children. Thus, in countries such as India and Bangladesh, for example, the number of state-run schools has not increased in proportion to the demand for education, pushing many students into private schools. A large number of respondents felt that the growth of private schools goes against the spirit of the FFA, which commits States to delivering 12 years of publicly funded basic education. Furthermore, market principles in education tend to distort public systems and increase inequality. Extending choice in education has tended to widen social inequalities and damage social cohesion. The key question for the report, therefore, is how can governments ensure that all education providers are held to account for delivering on all aspects of the right to education - including non-discrimination. Doing so makes this firmly a matter of core state obligation – not something that could be left to the vagaries of market dynamics and choice.

c. **Professional accountability of teachers**
   Respondents raised concerns regarding the inclusion of the professional accountability of teachers, as it was felt that elements of the concept note placed undue or unfair responsibility on the part of teachers as individuals, instead of considering the systemic failures which directly lead to poor quality being delivered in the classroom. For example, issues like teacher absence were highlighted in the original concept note as examples of failure of accountability, but there are well-known, researched, and acknowledged systemic reasons behind this. This ranges from requirements of teachers to take part in official duties which keeps them away from classrooms, to salaries being paid many months in arrears – or even salaries having to be collected in person at long distances away from their places of work or homes. Other challenges are the numbers of trained teachers, the distribution of teachers (between urban and rural settings, for example), and the quality and duration of teacher training – all of which are systemic issues for which governments should be held to account, not teachers.
   However, local level and school delivery can still be held to account, using alternatives which do not place undue responsibility on teachers as individuals. For example, teacher and school autonomy, and modalities of collective decision-making at school level, could be alternative mechanisms of ensuring systemic accountability at these levels.
**Key mechanisms for a Member State to be accountable to its people**

Respondents felt that government accountability needs to be viewed as a core function of the State, with space and mechanisms to enable both legislative bodies, such as a parliament or congress, and the public to hold governments to account. Accountability mechanisms must also be more than cosmetic; they must be genuinely transparent and participatory.

Accountability in the education system is, therefore, dependent on the extent to which Member States are accountable to citizens overall. Elements of accountability must also be built into each tier of the education system, from the grassroots to the national level.

However, respondents noted that there are significant problems when these fundamental conditions do not – or cannot – exist. One major example given was that of fragile states, and states affected by conflict; when no legitimate or democratic government is functional, it is a vast challenge for civil society actors – or even citizens at large – to play a significant role in holding states to account, even where some form of education system is functioning.

The GEM 2017 report must take a strong equity angle. A specific emphasis must be placed on ensuring that the voice of traditionally marginalised communities and children and youth are heard and reflected in decisions eventually taken, and that education providers (public or private) do not discriminate against marginalised communities.

The consultation highlighted the following mechanisms of accountability, either supplementing or expanding the mechanisms already identified in the concept note prepared by the GEM report. Furthermore, we feel that the 2017 report should look at the unintended negative consequences of different accountability policies.

- **Legislative accountability.** In international law the State is ultimately responsible for the implementation of the right to education. The elected government is, therefore, ultimately responsible for ensuring that the right to education is implemented. Apart from the government in power, wider mechanisms for legislators’ oversight over policy design and implementation exist in many countries, although their effectiveness varies. These mechanisms need to be looked into with a view to exploring possibilities of improving this aspect. It may likewise be noted that democratically elected governments are not a feature of just the national government, but may exist at provincial, district, or lower levels, especially in decentralised regimes.

- **Systemic and administrative accountability.** National education systems are complex systems with a range of specialised stakeholders undertaking specific roles. The scale at which education systems operate makes it essential for them to maintain fairly large cadres of administrative staff who perform essential functions. Formal grievance redress mechanisms also exist in a number of education systems as a means of ensuring systemic accountability. This includes administrative redress mechanisms like departmental helplines and government human rights bodies like national ombudsmen. Internal auditing mechanisms exist to ensure financial accountability. The accountability of each layer and of each actor in the educational system must be ensured. It may also be important to recognise that power asymmetries exist between the different stakeholders being held to account; those at the lowest level of the education department will have relatively less power to implement change.

- **Judicial accountability.** Many states have a right to education law which lays down the broad contours of the right to education. This must be supplemented by a clear mechanism for legal recourse that is accessible to those whose rights are violated and the mechanism must have adequate legitimacy that aggrieved parties can realistically expect timely and adequate remedy. For legislation to be effective, there must also be awareness about its provisions, the capacity to exercise it, a means to enforce it and community support and advocacy in its support.¹

- **Social/participatory accountability.** When a democratic environment and effective systems for participation are not in place, accountability cannot be social or participatory. The section on participatory accountability in the original concept note only considers the engagement of parents and local communities in grassroots level participatory structures, and appears to conceptualise accountability as a relationship between the family and the school. It would be important to not restrict the analysis to only grassroots level participation, but to also consider the extent to which citizens have a real chance to engage with processes at district and national levels. Autonomous education participatory fora, which bring together representatives from the government, civil society and the education community (especially teachers and students), are needed at all levels, be it at local or national, where policy is debated and decided, and where accountability takes place. Furthermore, even effective

¹ Juneja, N 2009 derived from using the conceptual frameworks proposed by Eugeen Verhellen (2000), and the ‘General Measures of Implementation’ of the CRC
engagement at school level by parents and communities must be scaffolded through mechanisms for training and ongoing support, and by measures to ensure timely and transparent access to key information. The section may also need to consider community awareness and the extent to which transparency policies are implemented as prerequisites for effective participatory accountability. Research evidence on the extent of effectiveness of parental and community and school governance mechanisms has been mixed. It may become necessary to look at the specific design elements of successful (and unsuccessful) community participation initiatives.

**What are some reasons behind less than effective accountability?**

Respondents considered the phenomenon of state and systemic accountability in more detail. We looked at the reasons for weak accountability relationships and some of the steps that could be taken to strengthen them. Given the influence of the GEM report, some consideration and examination of these issues within the 2017 report may have a positive impact on States addressing these systemic weaknesses.

GCE members listed the following as reasons behind weak systemic accountability:

- The State does not consider ordinary citizens and civil society organisations as valid interlocutors to whom it is accountable. Setting up of representative organisations and strengthening their capacities is critical. Civil society organisations must build broad alliances and bring together allies like key political representatives who support processes of dialogue and accountability by the State to civil society. Patriarchal and utilitarian views of the forms of government contribute to this trend.

- Failure to invest sufficiently in accountability structures – either formal or informal – and overall failure to invest in public education systems. These are, therefore, over-stretched and under-resourced. Although benchmarks for overall allocations to education exist, these are not closely tracked and member states are not held to account for making adequate investments.

- Lack of mechanisms for meaningful consultation and information. Failure to ensure teachers and civil society actors are engaged at all stages, from policy development to implementation and monitoring, has contributed to poor policy implementation.

- Anti-democratic mechanisms in several states and overall progressive shrinking of political space in some countries, and the rise of the criminalisation of teachers, students and education activists.

- Growing private sector/corporate influence over governments. Privatisation of education implies a shift from public accountability (of the State being responsible to its people) to a more individualised accountability relationship between a service provider and its client. Accountability relationships have also changed with private actors directly influencing policy-making. This makes it essential to put in place transparency and accountability measures to better understand the nature of lobbying undertaken. With the number of private providers increasing, the absence of effective regulation of private actors is emerging as a problem creating an accountability deficit.

- Narrowing definition of accountability to responsibility for delivering learning outcomes on standardised tests. These tests frequently adopt a narrow and extractive approach to assessment that focuses on collecting comparable data across countries instead of supporting student learning. A broad formative assessment in classrooms where teachers can link evidence about progress of students, given background and contextual differences, to actual improvements in their teaching is more likely to lead to improvement. There are clear, well-documented, negative consequences of testing-based accountability.

- Weak state capacity (especially in fragile and conflict-affected states). As stated earlier, an education system’s failure to deliver may be a reflection of a genuine lack of capacity to deliver results, rather than a mere absence of political will.

- Overall design of the governance system – such as excessively centralised, or ineffective decentralised mechanisms. For example, Bangladesh nationalised 26,000 registered primary schools in line with its right to education obligations; while state accountability was improved, this had not been adequately considered in the national budget.

- Parents’ limited knowledge on the right to education, lack of access to information related to utilisation of budget, weak engagement in planning processes, and absence of redress mechanisms for parents all negatively impact the ability of communities to hold governments to account. The existence of institutionalised spaces of participation, for example, require effort and political will, and a recognition of participation as a right in itself.

- Politicisation. While the role of the legislative branch is critical in ensuring accountability, it is important to recognise that elected officials – ministers, legislators and village heads alike – are likely to have their own political (and party political) interests.
• Reluctance to engage with topics considered controversial: in some cases, there is a lack of political will to implement policies pertaining to gender, holistic sex education in schools, sexual and reproductive rights, free education and non-formal education programmes for adults with a focus on citizenship.
• Corruption leeches already scarce resources and damages the State’s credibility, making it less accountable. The GEM report may want to consider issues of non-financial corruption.

How can accountability be strengthened?

Respondents also made some suggestions for strengthening accountability. These components must be part of accountability mechanisms at all levels of the education system, and again could be taken in tandem with the above observations to improve accountability.

• **Institutionalised spaces and mechanisms for democratic governance and clear lines of responsibility and accountability** must be part of national legislations and policies. Accountability institutions must be established at different levels, which must be designed with a view to ensuring that citizens are able to use those platforms.

• **Structured, transparent and functioning consultation mechanisms at all levels**: critical decisions including amendments to education policies or budgets must not be made behind closed doors. They must be subject to parliamentary oversight and be made through a process that involves ongoing dialogue with representative civil society organisations, including teachers, parents and students. Similar consultative processes are needed at provincial, district and local levels. These mechanisms must be in accordance with domestic and international human rights law, provide for consultation with all segments of the population, including children and young people and people with disabilities, and provide for an effective response within a reasonable timeframe.

• **Institutionalisation of spaces for social dialogue and accountability**. Adequate representation of civil society in policy formulation, implementation, planning, monitoring and evaluation processes, including advisory committees, task-forces, working groups and other relevant domains, must be provided at the national and provincial levels. Local Education Groups must include concerned government agencies, development partners and representative civil society organisations. Similar space for representative civil society and other stakeholders is needed at intermediate levels of the education system.

• **Adequate transparency, and adequate and timely access to information**. Prior dissemination of planned policies before their adoption is critical. Data and reports generated through government monitoring must be kept in the public domain and in forms that can be accessed by majority of citizens. For civil society’s role to be effective, it must have adequate access to information. Mechanisms for submission of alternative/shadow reports in case of need may also be necessary.

• **Finding the right balance of decentralisation** – both financial and non-financial – is vital. Decentralisation processes are important because they provide for handing more power to the people. However, it is important to recognise that many different administrative arrangements are classified as decentralisation and many regimes have not yielded desired results. The report should, therefore, look at the different modalities of decentralisation. Which powers are delegated to which set of stakeholders (community, local elected government, lower tiers of the education administration) and how these are then expected to work with each other determines the success and failure of decentralisation policies.

• **While accountability has been devolved, control over funds has remained centralised. In other instances, capacities of stakeholders have not been built to take on the new responsibilities.**

• **Strengthen internal auditing mechanisms** to ensure financial accountability of the state. Public expenditures must be tracked to ensure that the activities agreed are implemented in a timely manner and in the geographies agreed upon.

Several responses pointed to the interrelationships between national accountability and the role of the international community or international bodies.

• The international community plays a critical role in fragile states and countries affected by emergencies and conflict. Holding such a state to the same standard of accountability is problematic. The GEM report must devote space to the specific situation of accountability in such contexts.

• However, in today’s globalised and interconnected world, all countries face collective challenges and need collective solutions. Therefore, the report should recognise the accountability of international actors and donors, which must be accountable for their commitments to fund and support education. Similarly, civil society receiving status, support and funding from international donors should be held accountable.
International treaty bodies and review mechanisms are important spaces of accountability. Formal reports to human rights treaty bodies provide an international space for state accountability. Similar processes are also part of the emerging mechanisms for accountability as part of the follow-up and review of the SDG agenda.

Member states are part of and contribute to the functioning of the UN system and the international development systems. Countries must engage with and allocate adequate resources for engagement with international processes, including the newly created SDG architecture. This includes member states’ engagement at the regional and global levels and with the Geneva-based treaty bodies, and UNESCO. A special mention may be made to the Montevideo Convention and its Operational Guide.

The report should assess the extent to which new national, regional and global structures are prioritising the implementation of the Education 2030 agenda and necessary adjustments being made in legislation, sector plans, policies and programmes in light of the new provisions.

In conclusion

Respondents to the GCE consultation felt that the report must:

- Highlight the accountability of the State to deliver free education (and not ‘affordable’, as mentioned in the original concept note for the 2017 Report).
- Not position market-based accountability as a legitimate form of accountability, given that this is opposed to the letter and spirit of the Education 2030 Framework for Action.
- Take a critical stance against standardised testing as an accountability mechanism, and not hold teachers solely responsible for poor learning outcomes; this tends to place responsibility on individuals, as opposed to taking a systemic approach, which would affect more positive change.
- Address the role of the new governance structures and processes created as part of the SDG and Education 2030 agendas, including the High Level Political Forum, the role of the regional Commissions and of the SDG4/Education 2030 Steering Committee towards delivering the new agenda.
- Recognise existing power asymmetries in accountability relationships and examine the extent to which the voice of the poor and marginalised is included in decision-making.
- Recognise the importance of CSO inclusion in accountability mechanisms.

In terms of the overall approach, the report must focus on the State’s accountability to its people and address the role of the different parts of the education system to deliver the Education 2030 agenda in particular, and the right to education in general. The report’s framing must, therefore, be in terms of both (a) State accountability and (b) system accountability. As such, the accountability of democratic governance structures at the national and subnational levels, education planners, donors and education departments and other levels of the education system must be highlighted. Mechanisms arising from the justiciability of the right to education at the global, regional and national levels, including utilising the legal route towards accountability, must also be considered.