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Executive Summary

This response document is presented by the PTA Executive committees of East End Primary, St. David's Primary, St. George's Preparatory and other members of the community of St. George's. It is supported by its key stakeholders, including parents and guardians, teachers, and other wider community members, as evidenced in at the end of this document. It is presented in response to the 2021 "Consultation on a Proposal for the Introduction of Parish Primary Schools" ("the Parish Proposal"). The PTA Executives of each of the three St. George's Primary Schools have reviewed this document, and will submit school specific comments relevant to their particular parent groups.

There is no denying that Bermuda's public education system is in need of significant reform. Since the late 1980's there have been many attempts - reports have been commissioned, blueprints and plans have been implemented, but improvements have been marginal at best. As the world's education systems evolved and improved, Bermuda and its children have fallen further and further behind. Today's children will become the cornerstone of tomorrow's economy, and so the success of our education system will impact every facet of our Island. The time is now - we cannot afford to delay but, perhaps more importantly, we cannot afford to get it wrong.

It is almost impossible today for residents of Bermuda to understand how our schools are performing –

both against each other, against plan, and against international benchmarks. The severe lack of transparency, accountability and leadership highlighted in the Hopkins Report 2007 is still as much of a problem now as it was almost 14 years ago - and it is not as a result of inadequate funding. With an average spend of \$30,615 per child, the spend per child is 27% greater than even the most expensive private school on the island.

After thorough review and consultation, we believe the considerable shortcomings of this proposal will be fundamentally problematic, and will almost certainly inhibit any kind of successful reform.

Furthermore, we believe this proposal lacks sufficient detail for any person to make an informed decision to support. For example, though it is highlighted that successful education reform needs to address fundamental shortcomings in teacher performance, the curriculum, assessment frameworks and accreditation models, the Parish Proposal fails to address any of these issues. Globally, fiscal responsibility has never been more important, and there is no mention as to how this reform is to be funded - we estimate the building cost alone could be as high as \$207m. It is even unclear who the author is, what experience they have in this field, and how qualified they are to be providing advice on such an impactful proposal.

Executive Summary continued

The Parish Proposal centers education reform around the quality of buildings - a rationale that is fundamentally misaligned with both the plethora of research on this well-travelled road, and the Hopkins recommendations of 2007 - the experts behind this report being some of the leading faces of effective education. It is a one-size-fits-all approach applied across arbitrary geographical boundaries that would require the education system to essentially be rebuilt from the ground up. It would disadvantage those children that are in successful primary schools today, and goes against the typical approach taken to improvement - one of looking towards a system's successes and working out how to build on those.

As a public sector initiative, this report demonstrates a lack of proper consultation. It fails to meet both the fundamental principles of effective consultation, as well as the legal requirements that stipulate consultation **must** occur when proposals are still in a formative stage.

It is well understood that a lack of proper consultation results in less-informed decision making, lesser satisfaction from stakeholders with the outcome, and, most critically, a lesser chance of successful implementation. **This is a complicated undertaking.**

What is highlighted in this document is a fundamental need to revisit the consultation process, to include meaningful feedback from the community at each **step of the proposed changes.** We need to ensure the appropriate professionals are in place to guide and oversee the process from start to finish. We must start with a real consultation - a legally and morally acceptable unbiased process whose outcome drives the building blocks of a much more considered approach to school reform. We must collect sufficient, quantitative data that for perhaps the first time truly allows us to understand how our schools are performing today and we should use that data to develop an implementation plan that is methodical, strategic, targeted and flexible. A plan that builds upon what exists today and works systematically to improve, as opposed to discarding altogether. It's common practice in other education systems in the world to build on what works and use frameworks that are strategically designed to incrementally improve. We are confident that the outcome will not only generate increased stakeholder confidence but also do a better job of meeting the many and complex objectives of education reform and will ultimately improve the quality of public education in Bermuda. In the short term, this may mean taking a step back – and this is most probably true, but for long-term

Executive Summary continued

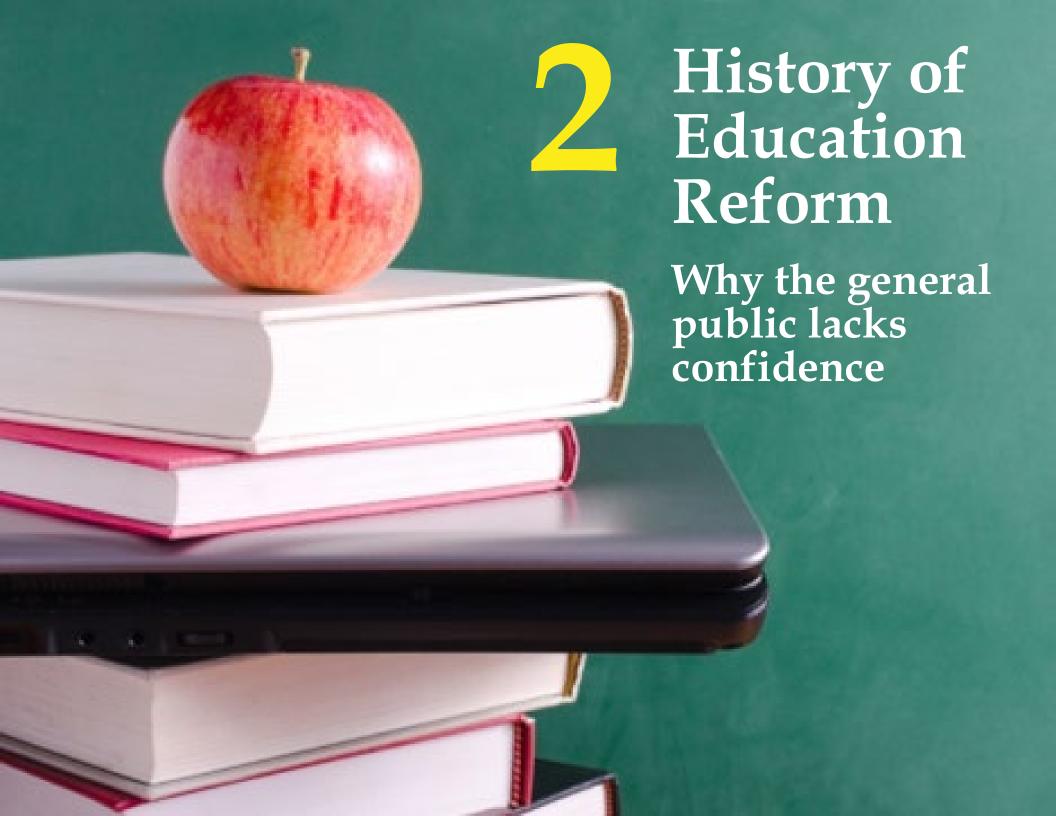
success, it is imperative that we ensure we are building on a solid foundation. We cannot afford to fail our children, again.

Education reform should not be about re-inventing the wheel. We demonstrate in this document that it is possible to streamline our primary school system in a more strategic manner - focusing on keeping school sizes small and class sizes at 20 children or under which aligns with academic research, whilst achieving the same efficiency metrics. We believe wholeheartedly that school closure decisions should be driven by academic performance, again in alignment with academic research, and that we should be examining our current successes and replicating where we can. We should be leveraging a pilot scheme before plunging head-first into nation-wide reform and we should be learning, adapting, and improving as a result of this experience. The aided school model (and similar Academy and Charter models in the UK and US respectively) have grown in popularity in these jurisdictions in recent years, as their governance structure is widely accepted to drive accountability and so teacher performance, and thus positively impact students academic achievement. should be leveraging these successes for our children.

We need to focus on tried-and-tested strategies that have been successfully delivered across the world.

"The route to achieving equity will not be accomplished through treating everyone equally. It will be achieved by treating everyone justly according to their circumstances."

-Paula Dressel



Why the general public lacks confidence

Since 2007, the Ministry of Education has placed before it a set of actionable recommendations, presented by some of the world's leading educational experts, that if implemented successfully would improve the quality of public education in Bermuda. Over the last 14 years, it has tried, but failed to even take the smallest steps on the path to reform.

The Department fundamentally lacks transparency, accountability, and leadership and has demonstrated a clear lack of either ability or willingness to change any of these key qualities, that are fundamental to the success of any team. It is almost impossible for residents of Bermuda to understand how well our schools are performing – both against each other, against plan, and against international benchmarks.

Over and over "Plans" and "Blueprints" are presented and not followed through. Multi-year plans have been released, and the general public are yet to see a single follow up document that demonstrates any kind of status update versus original goals.

With a 2020/2021 budget of \$137,462,000 and a current enrollment of 4,490 children as of September 2020 (including Preschool, Primary, Middle, Senior, Special and Alternative Education) this is equivalent to

\$30,615 per child. This number exceeds the cost of even the most expensive private school on the island by 27%. None of these private schools are suffering from the same issues in terms of performance or facilities. This statistic alone should raise grave concern in relation to the ability of the Ministry of Education, without drastic reform, and significant qualified guidance, to provide a better future to the children of Bermuda. Back in the late 1990's, Minister Dill stated that the top goal in public education was to make each public school as good as the very best private school. (J. Dill, personal communication, as cited in Williams, 2004). For two decades, the Ministry of Education has fallen short.

Confidence is therefore extraordinarily **low**. Under the current structure, the Ministry of Education does not have the ability to implement such transformational and bold changes as is now being proposed in the most recent education reform proposal of Parish Primary Schools.

Whilst the vast majority of schools in Bermuda are underperforming, there are few that, for one reason or another, are providing an exceptional education to the children of Bermuda, and, in light of the above concerns, it would be gravely irresponsible to support the idea of disseminating these successes in favor of such reform.

Early days

The restructuring attempts of the Bermuda Public School System dates back as far as 1987, when, as a result of extreme dissatisfaction with public schools, the government announced its intention to restructure education. The Minister of Education, Gerald D. E. Simons, appointed an Education Planning Team (EPT) to design a restructuring plan, and the team worked eight years developing it. An attempt was made in 1995 to implement the EPT restructuring plan by opening CedarBridge Academy with Principal M. Payette, but it was not accepted by the public (Williams, 2004).

Little changed in the years that followed, and the education system was struggling by 2003, Dr. James Kennedy, United States educator said, "If what has been done to the Education System [in Bermuda] had been done by a foreign power, it would have been deemed an Act of War" (Williams, 2004).

Hopkins Report

In March of 2007, a team of six educators with over 150 years of relevant experience reviewed Bermuda's education system. The team was made up of the following individuals:

- Professor David Hopkins (ranked world's 16th most influential educator)
- Professor Peter Matthews, OBE, (responsible for Inspection Quality and Development in Ofsted from near its inception in 1992 until 2003)
- Two evaluators from England who are former members of Her Majesty's Inspectorate
- Two team members with direct Bermuda experience

This report noted, "direct observation of education taking place in Bermuda was fundamental to the review process". As such these reviews were carried out over two trips to Bermuda, with visits to all public primary, middle, secondary and special schools, a sample of pre-schools and Bermuda College. Additionally, the process included interviews with key stakeholders, analysis of documentation and performance data, there were three public meetings, and an open invitation to anyone with views about public education in Bermuda to write in confidence to the Review Team.

Rigorous findings were published in May of the same year in the form of the "Hopkins Report". The 40-page report consisted of 133 findings and ten recommendations (see following page). Although the Hopkins Report findings present a "fairly bleak" picture, the redeeming feature was a strong potential for improvement among teachers and principals. The Hopkins review team was asked to focus on six areas of concern including: corporate leadership; a strategy for education; support for the improvement of education; social inclusion and special educational needs; the quality of leadership; and standards of teaching, learning, and achievement.

Hopkins Report continued

The ten recommendations outlined in the Hopkins Report are to:

- 1. create self-governing Federations around clusters of primary schools and each middle school,
- dramatically improve the quality of teaching,
- move quickly to improve the quality of leadership by principals,
- 4. introduce delegation and transparent accountability at all levels,
- 5. radically reform the Ministry of Education,
- 6. strengthen the strategic management of the education system,
- federate secondary and tertiary education, and, as soon as possible, raise the school leaving age,
- align the curriculum both vertically and horizontally,
- 9. respond to concerns about inclusion and behavior,
- 10. harness the power of parents, business and the community in the reform effort.

It should be noted, the Hopkins report is the only one in recent decades that not only assessed the existing conditions but developed a set of actionable recommendations for improvement. Additionally, not a single one of these recommendations focus, even partially, on the condition of the physical walls in which our children are housed whilst being educated.

The findings outlined in the Hopkins Report suggest that implementation of the 10 recommendations should result in raising the standard of education in Bermuda. (Hopkins et al., 2007)

There are pockets of excellence in our school system. Of the 25 schools examined (18 primary, 5 middle, 2 senior)

- two schools were awarded an "Outstanding" grade for school effectiveness
- three were awarded an "Outstanding" grade for quality of leadership

Blueprint for Education Reform

It took an additional three years for the Ministry of Education to release their Blueprint for Education Reform. The Bermuda Public School System Strategic (BPSS) Plan mapped out the strategic vision to improve public education from 2010-2015. The primary goal of this document was to operationalize the priorities recommended in the Hopkins Report (2007) and address the goals and targets set for improved student outcomes.

The Review Team proposed a reform model that was based heavily on "re-professionalization" as a means of addressing the issue of teaching and learning, recognizing that fundamentally, it is the quality of teaching, and what happens in the classroom that matters. The plan proposed to hold all students and professionals accountable for results, and recognized leadership to be a crucial determinant of school success, intending to give principals autonomy around curriculum delivery; teacher evaluation, selection and retention; facility management; and budget, while holding them accountable for student growth.

To ensure principals are supported in this expansion of authority, the blueprint outlined that School Advisory Councils (SAC) were to be formed at each school which does not currently have a school board. The mandate of which was to provide advice and guidance to the principals on policy matters that lead to increased student outcomes. It was noted that this will be an opportunity for the community to embrace our schools and to build leadership capacity within the BPSS.

There were seven strategic priorities to be implemented in the five-year plan, with a focus on the first three in Year 1:

- 1) Implement an internationally recognized curriculum that is externally assessed;
- 2) Improve the quality of teaching and learning in the classroom;
- 3) Strengthen and distribute leadership;
- 4) Facilitate the improvement of standards via accountability and transparency;
- 5) Maximize the contribution of parents and community;
- 6) Improve the efficiency of delivery;
- 7) Improve the culture and climate of the Department of Education and schools.

The report contained a significant amount of data, demonstrating actual school performance over the 2016-2019 period, as well as specific, measurable goals and targets for the future. The intention was for the plan to be revisited, modified and adapted on an annual basis to assess our progress and to refine our objectives for the period ahead, reporting transparently on the performance of schools, the Board, and the system as a whole and to drive the accountability and transparency that had been missing for so long.

Blueprint for Education Reform continued

The Cambridge curriculum was established in May 2010 for English, Math and Science.					
The Department of Education failed to publish a single progress review. There is no evidence to suggest priorities 2-7 of the Blueprint Educational reform were implemented.					

SCORE Report 2015

The next significant initiative was in October 2015, the SCORE advisory committee was established – adopting the almost identical "Vision" and "Mission" as the Blueprint for Reform in Education 5 years earlier, and based upon the Hopkins report data of 2007, to provide findings to address the following issues:

- i. Schools for consolidation or closure for 2016/17 academic year and beyond Proposals for school closure were provided, though not subsequently actioned.
- ii. Plans for improving the quality and consistency of programming across primary schools

The committee was to provide <u>plans for improving the quality and consistency of programming</u>, other than several mentions in the report that alludes this has been considered "a research team had been formed to gather information on school systems throughout the world that demonstrated continued excellence", this report fell extremely short, and turned out to be essentially no more than a review of existing conditions. The subsequent value of this became no more than a laundry list of health and safety items to be remediated.

https://www.gov.bm/articles/education-minister-provides-update-score-report-repairs-and-public-school-

maintenance-works

***The report strongly advised the need to introduce a systemic plan for maintenance and repairs, however this was never implemented, and as solidified by the 2018 Safety and Health Inspection Report produced by the Cabinet Office, this report identified that these 2015 "unresolved issues had subsequently grown into larger ones." ***

iii. Opportunities for efficiencies and cost savings

This was not reported as "much of the financial information required was not readily available", "in some cases there was no record at all." This report was commissioned at the Ministry of Education's request and for insufficient data to be available is cause for concern

(Score Advisory Committee, Report of Findings and Recommendations, December 2015).

SCORE Report 2015 continued

In terms of assisting the Ministry of Education in "delivering a first-class education of global standards" this report did not deliver. There were no actionable proposals that addressed the quality and consistency of education. However, what it did provide was an extremely rigorous process around assessing these existing facilities by designing, testing, standardizing (as far as possible) and implementing a quantitative scale that rigorously assessed the following 13 "Study Factor" criteria:

- 1. School Utilization
- 2. Classroom Capacity
- 3. Financial Resources
- 4. Building Condition
- 5. Safety and Accessibility
- 6. Recreational Space
- 7. Range of Programs
- 8. Student/Staff Ratio
- 9. IT Infrastructure
- 10. Special Services
- 11. Transportation
- 12. School as a Community
- 13. Flexibility

SCORE Report 2015 continued

Though the SCORE report failed to address a majority of key directives, it still had more rigor than the current Parish Proposal. Factors that improved the rigor and confidence around these results include:

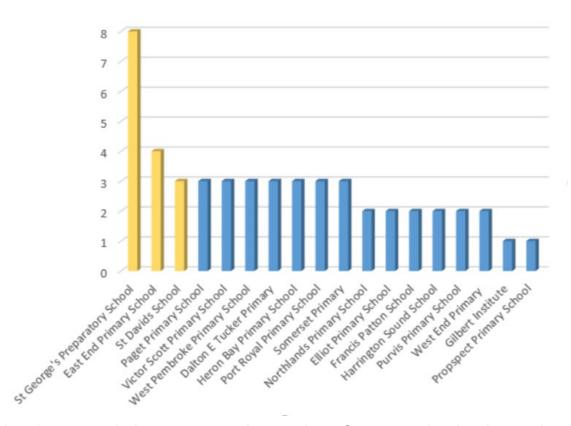
- Engagement Key recognition that, according to Larry Ferlazzo, there is a distinct difference between Involvement and Engagement. The conscious understanding that engagement suggests a much more inclusive approach to include open and proactive communication with all stakeholders. They utilized a process that would engage and involve stakeholders, allowing them the opportunity to contribute to the process regarding these issues.
 - Interviews were carried out with a diverse cross-section of school staff members – including counselors, learning support, music, Art, PE, foreign language teachers, principals, deputy principals, custodians, administrative assistants, P1-P6 teacher representatives.
 - Principals were invited to submit an "open submission" which allowed them the opportunity to provide any additional information that they felt was not captured on the School Profile Summary or during the school site visit.
 - In efforts to increase engagement two public sessions, and one session with the Department of Education staff were held to allow stakeholders to contribute their observations and concerns regarding their school communities – the feedback gathered was submitted to the Data Analysis Subcommittee so that the voices of the stakeholders could be reflected in the report findings.

- Suitable Qualifications The SCORE Advisory committee
 was comprised of 22 individuals, and included a large
 cross-section of stakeholders, namely parents,
 principals, teachers, Bermuda Union of Teacher
 representatives, Ministry of Education representatives,
 and other community members that were suitably
 qualified to conduct the investigations.
- Appropriate and Consistent Process A process committee was established to develop a terms of reference document for the SCORE advisory committee to use as a rigorous framework to govern the scoring process (this comprised of a School Profile Summary, and a rating system).
 - Phase One included testing the accuracy of the rating system that would subsequently be used to provide a qualitative measure for each school.
 - O Phase Two included training sessions to ensure members were able to accurately use the survey tools, the accompanying rating system, and the established site visit protocols, and a training session for Principals that also included the School Profile Summary that was to be completed by them prior to school site visits.
 - Three identical site visit teams were established and given strict protocols to follow regarding how the site visit should be conducted to increase consistency.

SCORE Report 2015 continued

The data for each of the above Study Factor criteria was reviewed and scored on a scale of 1 to 5 for each school. Schools with scores of 4 or 5 indicate strong or excellent achievement of the criteria, a score of 3 indicates satisfactory achievement of the criteria, and a score of 1 and 2 represents either no achievement or partial achievement.

Number of times Primary Schools scored 4+ out of 13 Study Factors Assessed

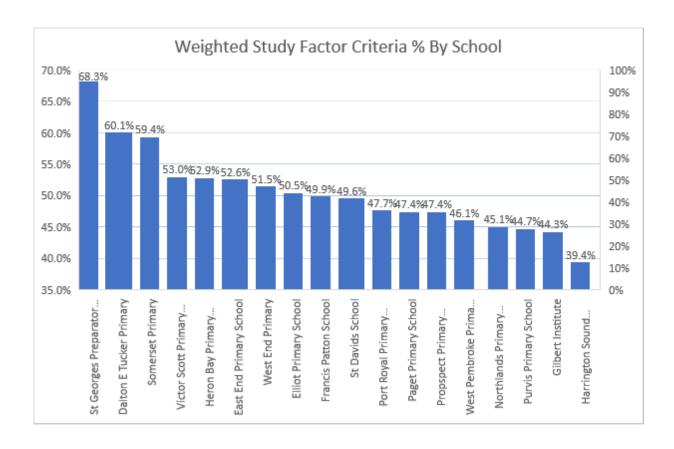


**It should be noted that the top three schools when scoring 4+ on study factors are in St. George's Parish. **

The above graph demonstrates the number of times each school scored either a 4 or 5 (indicating strong or excellent achievement) out of a total of 13 factors.

SCORE Report 2015 continued

Once all schools had been assessed, p72 of the report allocates a "weighting" to each of these results and generated a "weighted average system score %". The below graph displays these results.

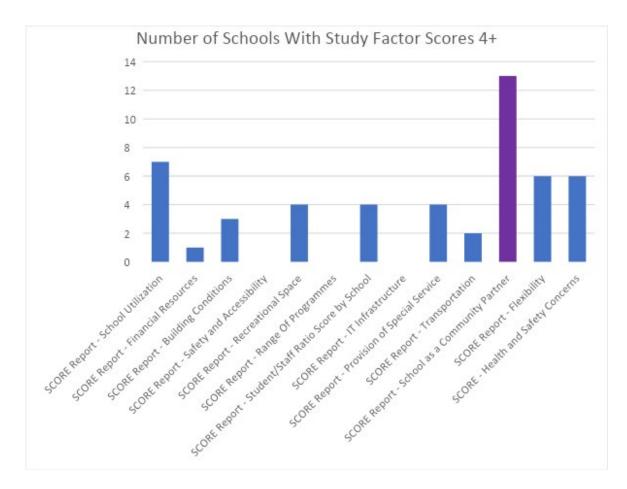


As with the above testing criteria, St. George's Prep, East End Primary and St. David's Primary ranked first, sixth and tenth respectively.

SCORE Report 2015 continued

In particular, it should be noted that the "Community Partner" criteria that appears to be fundamental to the Parish Proposal, was weighted at a 1, on a scale of 1-4, with 1 being the lowest importance, and 4 being the highest.

Furthermore, it was specifically called out in the SCORE report that Bermuda, as a whole, obtained strong results in only one of the Study Factor Criteria – Community Partner – obtaining a score of 72%, with 13 of 18 schools scoring a 4 or 5. Therefore it is surprising that this appears to be a fundamental driver behind the 2021 Parish Primary proposal given we already concluded this was our single most successful attribute.



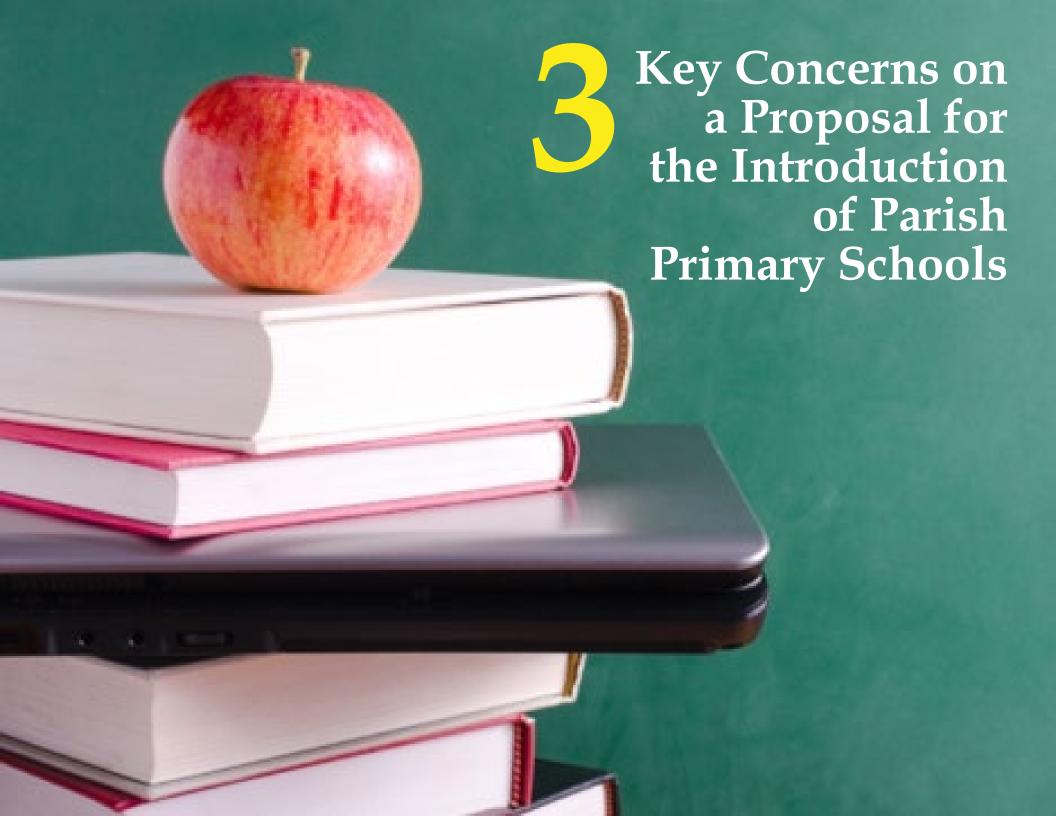
Similarly to other significant education reform documents, there were no further action points taken following the release of this document. This perhaps is not surprising given the lack of attention given to the Hopkins recommendations highlighting the urgent need for both radical reform of the Ministry of Education and the call to strengthen the strategic management of the education system.

Plan 2022

In 2017, Plan 2022 was developed. It is unclear as to what the basis for Plan 2022 was, however, following significant consultation with 1,309 Bermudians in Phase 1 and 1,444 Bermudians in phase 2, it set 5 specific, measurable, strategic "key outcomes" to achieve by 2022:

- Priority 1 Increasing Academic Rigour and Student Engagement Priority
- **Priority 2** Ensuring Career, College, and Workforce Readiness
- Priority 3 Enhancing the Quality of Teacher Practice and System Leadership
- **Priority 4** Improving Infrastructure and Instructional Resources
- **Priority 5** Ensuring System Success

There has been no data released that demonstrates how we are progressing against the key outcomes set in Plan 2022.



Feedback on Parish Primary Schools

The 2021 Proposal for the Introduction of Parish Primary Schools ("the Parish Proposal") outlines that there are four main reasons why holistic and wideranging change is being undertaken:

- the Government mandate to deliver on its commitment to change and transform public education
- ii. community demands for change and transformation through the development and articulation of Plan 2022: Bermuda's Strategic Plan for Public School Education
- iii. the trend of declining enrolment and,
- iv. most importantly, the need to improve student outcomes and attainment for all learners.

Whilst fully supportive of each of these reasons individually, we absolutely recognize the data supporting declining enrolment and the need to adapt, and subsequent agreement that resources would be better deployed to fewer facilities. We also strongly support the position that there needs to be an equitable public education system for <u>ALL</u> of Bermuda's children, which should become the first choice of education for all. After several decades of significant underperformance, it is time for this vision to finally be delivered for the benefit of our children.

"To deliver a first-class education of global standards ensuring students reach their full potential."

Ministry of Education, Bermuda - Vision

Feedback on Parish Primary Schools

Furthermore, there is strong support for the phasing out of middle schools and returning the system to a 2-tier education system — many individuals in support of this submission have experienced first-hand the negative impact the middle school transition has had on their children, and see this as yet another shortcoming of the historic performance of the Ministry of Education. This is absolutely consistent with the feedback provided as part of the 2007 Hopkins report. Contained within the executive summary on page 7, the Proposal explains that:

"If we are to see improvements in education across all school and year levels, we must:

- shift to an assessment programme that is varied, robust, relevant and enables students to demonstrate what they have learned in a variety of authentic ways
- shift to a system-wide research-based 21st century instructional model for delivering the curriculum
- ensure that all teachers in our classrooms and all leaders of our schools have the qualifications and certifications needed to improve education outcomes for our students."

Again, we agree entirely with the above three action points, as a subset of the complete picture. What

follows in the remaining 79 pages of the Parish Proposal is therefore particularly confusing, as it does not outline how any of these key action points are to be addressed.

We oppose the Parish Proposal as presented. We believe the underlying principles need to be better aligned with education best practice.

We believe the Proposal needs to be given additional consideration to ensure it becomes a more robust and all encompassing framework that is capable of driving the successful reform Bermuda so desperately needs.

The following six points encompass our key concerns with the Parish Proposal as presented:

1. Direction is Contrary to that of the Highly-Skilled Preceding Educational Advisors

The Parish Proposal goes against every one of the Hopkins recommendations. The Hopkins report is the most comprehensive and high quality review in the history of the Bermuda education system. The collective experience of this report group stands at over 150 years. Hopkins himself has been ranked as the world's 16th most influential educator, Professor Peter Matthews, OBE, was responsible for Inspection Quality and Development in OFSTED from near its inception in 1992 until 2003, along with a further two evaluators from England who are former members of Her Majesty's Inspectorate, and two team members with direct Bermuda experience.

2. Rationale

The Parish Proposal is driven entirely around the quality of existing buildings with a somewhat peripheral supporting rationale as it correlates to successful education. Even if the quality of the building were to drive successful education, it could be argued that any school selected to remain open would require such significant modification of infrastructure to meet the new standard, that the scores concerning the condition of the properties become largely irrelevant.

It is hard to support the quality of building as a key correlate of education, when it appears to contradict the plethora of research done over the years around school effectiveness. One of the most prominent theories of effective education that is used today to shape education improvements is that of Lezotte, 1990. There have been many similar theories over time, but fundamentally these correlates remain largely unchanged. We must ensure that the actions taken on the way to transformational education reform align with that of current best practice to ensure we achieve optimum results for the children of Bermuda.

2. Rationale cont'd

The 7 Correlates of Effective Education (Lezotte, 1990)

- · productive climate and culture,
- · focus on central learning skills,
- appropriate monitoring,
- · practice-oriented staff development,
- strong leadership,
- · salient parent involvement, and
- high expectations and requirements

The PISA report that is referenced in the Parish Proposal supports the same points made above.

Though these correlates may appear dated in terms of development they are still widely used and relevant as a foundation to a quality education worldwide:

The Council of Ontario Directors of Education (CODE) is an advisory and consultative organization composed of the CEOs of each of the 72 District School Boards in Ontario;

http://www.ontariodirectors.ca/CODE Advisories/Downloads/CODE%20Advisory%20No%209%20WEB.pdf

District of Columbia Public Schools – 49,065 Students

https://web.archive.org/web/20150223025655/http://dcps.dc.gov/DCPS/About+DCPS/Strategic+Documents/Effective+Schools+Framework

Sunnyvale School District California – 6,600 students https://www.sesd.org/Page/1001

Ypsilanti School District, Michigan – 3,840 Students https://www.ycschools.us/our-schools/high-school-resources/seven-correlates-of-effectiveness/

3. High Performing Schools are being penalized

This proposal essentially penalizes those primary schools that are currently providing a high standard of education to our children as opposed to understanding better how they work and applying this model nationwide. More typically, when trying to improve a program, we tend to look towards its successes and work out how to build on those. Ample research suggests the aided school model yields superior results, with the ability of the school to hire its own staff, and harness accountability at all levels - yet this does not appear to be a consideration.

It is possible, with incredible commitment and governance (which has not been reflected in past performance), that many of these positive attributes can be rebuilt under the new structure with time, but the risk of implementation failure of such an approach would be inherently higher than with an approach that would keep these high performing schools in operation.

Consider for example the OFSTED (Office for Standards In Education) inspection and regulation model in the UK. The rigorous inspection framework yields four overall judgements - Outstanding, Good, Requires Improvement and Inadequate. Those schools ranked Outstanding are exempt from regular inspections and will not be inspected again unless concerns are raised or some very specific conditions are met. Similarly, those schools ranked Good will only receive a short one-day inspection every four years. OFSTED focus their attention primarily on those schools that are not adequately performing in an effort to raise the overall standard of education nationally, and leave alone those systems that are currently performing as required.

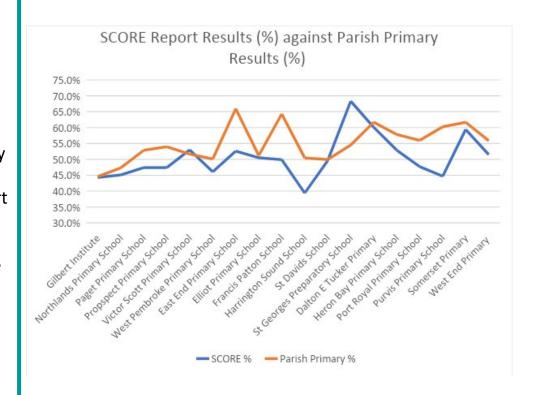
4. Experience and breadth of those responsible for the Parish Proposal

The report lacks an author. It does not identify those responsible for its production, their credentials and relevant experience in producing such a document. It is important for the stakeholders to understand whether collectively there is sufficient experienced personnel involved in this process to be able to take an educated position on how much reliance can be placed on its content. In addition, and in contrast to the SCORE report, there is a lack of disclosure as to who comprises the Location Strategy Team – the report does disclose only 40 years of collective experience, which is not sufficient to be advising in such capacity. Research suggests that cumulative experience should be between 70 - 100 years for a team to have confidence in the reporting outcomes.

5. Subjectivity

The "Comprehensive Rubric" for scoring the study factors is much more subjective as a result of being much less quantitative than that established during the SCORE report. There are significant discrepancies on how the SCORE report ranked schools and how the Proposal ranks when essentially the criteria is extremely similar. In fact, it is our understanding that in some instances data was taken directly from the SCORE report and utilized in this capacity in its original form. Many factors discussed earlier in this document (p14) would deduce that the SCORE process was implemented more rigorously and consequently results would be more representative of the environment than the Proposal and therefore concern arises as to the reliability of the underlying data. The below graph shows the results of both studies plotted on the same scale – there are significant discrepancies between the two sets of reports – in some cases as much as 35%. Whilst there was a 5 year period between both sets of results, there seems to be very little correlation between the two sets of data, calling into question their reliability.

Statistically, these data sets demonstrate a correlate of 0.4 where -1/1 is strong correlation between the two data sets and 0 is equal to no correlation.



6. Weighting and Transparency

The Proposal groups the "Study factors" into 4 broad categories:

- i. Existing Building Conditions
- ii. Land/Property Conditions
- iii. Safety & Health
- iv. Transportation

These categories were then allocated 20%/30%/30%/20% based upon "their level of importance". These allocations appear to be somewhat arbitrary and come with no additional information - of particular interest was a low 20% weighting allocated to existing building conditions, given of course that is the basis for the Parish Proposal. Furthermore, although the scoring process was explained, the cumulative effect of the six person scoring along with the application of maximum ratio points means it is almost impossible to use this data to "unwind" the calculations to really understand how the different schools scored against the rubric.



Perhaps more importantly, are those factors we believe should be included within any competent proposal but have not been addressed.

1. No understanding of financial implications of this Proposal

Throughout the 86-page Proposal there are 3 paragraphs that reference funding. There is no clear budget or direction and, in fact, as part of the Parish Zoom presentations it was conveyed that the Minister of Education does not believe in setting a budget before his educational dreams. At a build cost of \$500/sqft, based upon an estimated cost for the new Somersfield Academy's Centre for International Education, at a 188sqft/student target (https://spaces4learning.com/Articles/2015/07/01/School-Costs.aspx) and 2020/2021 enrollment numbers, this initiative could cost the Ministry of Education an estimated \$207m, which does not cover a single dollar outside of capital construction costs. In the current economic circumstances this is not a fiscally responsible approach, nor do we believe this presents the best return for the education system. Any additional debt service costs will essentially take away the funding that will be directly expended in the pursuit of better education.

Per the 2021/2022 Pre-Budget report, "At the end of September 2020, total net government debt outstanding was \$2.9 billion, which was \$600 million beneath the present statutory debt ceiling of \$3.5 billion. The Ministry of Finance regards this level of debt as a serious challenge. With recent borrowings, the annual debt service cost is currently \$127.2 million, claiming 13.6 cents of every dollar of revenue that the government takes in. This underlines the urgent need to balance the budget and eventually pay down on our debt."

Furthermore, this position is anticipated to worsen - "After factoring in the impact of COVID-19, and various austerity measures taken by the government, the revised deficit for 2020/21 is estimated at \$295.4 million. This level of deficit is unsustainable."

Initial 2021/2022 estimates under the two initial scenarios presented anticipate a further budget deficit of - \$127m to -\$156m. (2021 Pre-budget report)

2. Lack of Proper Consultation

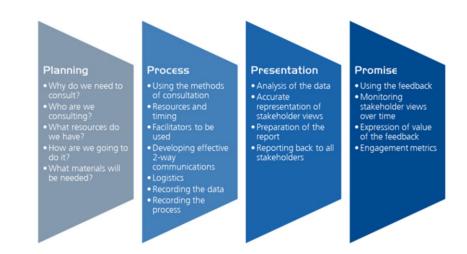
The lack of proper consultation results in less-informed decision making, lesser stakeholder satisfaction with regarding outcomes, and a lesser chance of successful implementation. "Public services, in particular, have embraced the approach, seeking involvement of the public in the development and shaping of future services to particular communities; an acknowledgement of the need to involve service users in service development, review and policy making. Thus, consultation has become a requirement in the successful development of public policy and service" (Carol Ann Morgan – B2B International). This was also called out in the 2015 SCORE Report Section V: Closing Considerations:

"Consultation with impacted staff, parents, and other key stakeholders should take place early in the process to promote understanding, ownership and the opportunity to contribute to the final outcome."

(SCORE Report – 2015)

Unlike the majority of prior education publications discussed above (Hopkins report, SCORE report, Plan 2022), the Parish Proposal has not followed a true consultation process. It was felt by many during the Parish Zoom presentations that the decisions had already been made and additional feedback was not well received.

The below figure demonstrates the consultation process (Carol Ann Morgan – B2B International).



Through a legal lens, the same conclusions can be drawn (see [i] below) - There are four components to fair consultation. They were first articulated by Stephen Sedley QC, and accepted by Hodgson J, in R v Brent London Borough Council, Ex p Gunning (1985) 84 LGR 168 QB at 198; endorsed by the Court of Appeal of England and Wales, eg in R v North and East Devon HA, Ex p Coughlan [2001] QB 213 EWCA per Lord Woolf at para 108; and in the UK Supreme Court by Lord Wilson and Lord Kerr JJSC in Moseley at para 23. Lord Woolf summarized them thus:

2. Lack of Proper Consultation cont'd

"It is common ground that, whether or not a consultation of interested parties and the public is a legal requirement, if it is embarked upon it must be carried out properly. To be proper,

- i. Consultation must be undertaken at a time when proposals are still at a formative stage;
- ii. It must include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response;
- iii. Adequate time must be given for this purpose; and
- iv. The product of consultation must be conscientiously taken into account when the ultimate decision is taken...

For completeness, Lord Wilson identified three further points which emerged from the authorities:

- i. The degree of specificity with which the decision maker conducts the consultation may be influenced by the identity of the consulted: the more expert the consultees, it may be, the less the need for specificity;
- ii. The demands of fairness are likely to be higher where the decision maker contemplates depriving someone of an existing benefit or advantage than when the claimant is simply an applicant for a future benefit; and
- ii. Sometimes, particularly but not only when this subject of the consultation is limited to the decision maker's preferred option, fairness may require consultation about, or at least reference to, other options, even where these have been discarded. See paragraphs 26-28.

3. Significant Gaps in Information Provided

The proposal identifies key implementation factors for success and then fails completely at addressing them. There are many fundamental areas not addressed in the Parish Proposal. The five interrelated priorities outlined in Plan 2022 have not been covered in synchronization. Only part of Proposal 4 is covered, which in our opinion is insufficient.

To demonstrate this point, we have added Figure 1 from the Parish Proposal, which illustrates the current state of primary education and contrasts it with the proposed and intended future state under the Parish Primary School model. On the right-hand side of this table you will see either a tick or a cross, depending on whether we believe the issue has been addressed within the Parish Proposal. There are 7 items highlighted as addressed, and 15 highlighted as not-addressed which is a 32% rate of address. Furthermore, almost all of the complex and strategic items to be addressed (such as curriculum, instruction, assessment and accreditation) are not addressed.

We believe the Parish Proposal lacks sufficient detail for any person to make an informed decision to support.

Figure 1. The Current State and Future State for Primary Schools

Category	Current State	1	Future State	
Number Schools	18 Schools		10 Schools	
Enrollment	65 to 195 Students		Up to 300 Students	
Teacher Student Ratio	1: 16 and 1:25		1:15	
Location	Dispersed		Parish Primary Schools	
Age of Students	5 Years to 11 Years	·	5 Years to 13 Years	
Year Levels	Primary 1 to Primary 6		Primary 1 to Primary 8	
Facilities	47 to 100 Years Old	Redesigned, Expanded and Purpose-built		
Ethos	Disciplinary		Restorative	
Curriculum	Misaligned, antiquated and limited offerings		Vertically aligned, rigorous, relevant, expand offerings	
Instruction	Non-systemic Instructional Practices		21st Century Instructional Models	
Assessment	One Size Fits All Assessment Programme		Varied, Rigorous and Relevant	
Assessment	Preparation for Assessments		Preparation for college, university, workforce and global citizenship	
Staffing	Current Positions and Required Qualifications		Additional Specialists and Expanded Qualifications	
Programmes	Limited in Scope and Number	Expanded		
Services	Learning Support, Counselling, Behaviour		Wrap-Around Services	
Technology	Computer Labs		Computer Labs and Individual Devices	
Food Services	Selective and sporadic		Cafeteria Services	
Services	External services for OT, PT, Speech		OT, PT and Speech Staff	
Transportation	Public Buses		Dedicated School Buses	
College/Career Entrepreneurship Focus	Non-Existent		Embedded into the Curriculum	
Accredited	Non Accredited	All Accredited		
Outcomes	Minority of Students Attaining Targets		All Students Growing and Achieving Success	

4. No implementation plan communicated

Such transformational change cannot be supported without a detailed understanding of how it is proposed that this is to be achieved, particularly in light of prior shortcomings surrounding implementation. Understanding this detailed plan will improve stakeholder confidence.

5. No consideration has been given to running a pilot school – and should be.

This will allow methodologies to be tried, tested and improved before rollout of a nationwide scheme and a successful implementation will improve stakeholder confidence and support.

6. The scale of reform considered within this document is overwhelming

A phased approach should be considered – targeting middle school reform, primary school consolidation, introduction of signature schools, building improvements, and the overall transformational improvement required in teaching standards, assessment criteria, and accreditation all at once is far too ambitious for even the most effective governance structures.

7. One size fits all approach is misguided

This will not result in the best decisions on a location-by-location basis. The Proposal notes, "The primary schools within each parish have been evaluated using an assigned weighting for each of the study factors. Therefore, the final weighted scores for each primary school must be considered by parish, and not nationally across all public primary schools".

Upon further review, we are still unable to link how the conclusion (second sentence) is derived from the statement (first sentence), however, in contrast, we do not believe that each primary school must be considered by parish. If, in fact, we did agree with this Proposal's methodology, at a minimum we would ask the question as to why the top 10 scoring schools overall were not selected, rather than utilizing an arbitrary geographical boundary? The impact of selecting the top school in each parish, versus the top 10 schools overall can be seen below – assuming school #10 in Devonshire is new. By implementing arbitrary parish boundaries in the selection criteria the outcome is only 5 of the top 9 (or 56%) of the top performing schools being selected.

Of course, there are additional factors to consider here, such as location and logistics and so perhaps that is somewhat of a simplistic view, however when you

School	Parish Primary %	Rank Based on Top 9 Scores (Assume 1 new)	Selection Based on Top School Per Parish
Gilbert Institute	44.58%	18	n
Northlands Primary School	47.31%	17	n
Paget Primary School	52.85%	11	٧
Propspect Primary School	53.97%	10	n
Victor Scott Primary School	51.64%	12	Y
West Pembroke Primary School	50.11%	15	y
East End Primary School	65.91%	1	У
Elliot Primary School	51.19%	13	n
Francis Patton School	64.27%	2	У
Harrington Sound School	50.44%	14	Y
St Davids School	49.94%	16	n
St George's Preparatory School	54.52%	9	n
Dalton E Tucker Primary	61.69%	3	¥
Heron Bay Primary School	57.83%	6	n
Port Royal Primary School	55.97%	7	n
Purvis Primary School	60.26%	5	У
Somerset Primary	61.66%	4	y
West End Primary	55.88%	8	n

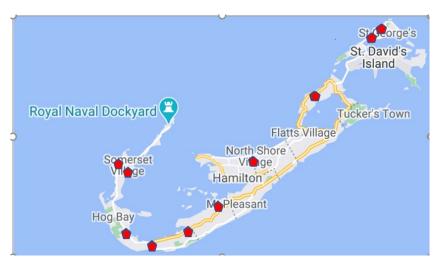
Column 2 identifies the scores given to each school based on the Parish Proposal grading of the building. Column 3 highlights the top 9 scoring schools according to the scores in column 2. Column 4 identifies those schools finally selected.

**Note — only those in green represent the selection of a top ranking school of the Parish Proposal

overlay the top 10 schools over a map of the island you can see that whilst there would be one or two additional locations that would require further consideration, it would very likely result in the basis for a proposal that encompassed a greater volume of the top rated schools versus the Proposal that has been put forward.

Factors that have not been addressed

7. Continued



Furthermore, no data has been presented to show that the community in St. George's Parish has called for improvements in Primary School education. During recent school and community polls, parents have demonstrated that they are highly satisfied with the educational outcomes at Primary School level in St George's Parish. However, it is understandable that the national surveys, overall, show considerable demand for improvement. This indicates that the one size fits all approach will penalize high performing schools because of a national result. It is not logical to transform education in a neighbourhood where students are performing strongly and parents, teachers and the community are very satisfied with the standard. The proposed changes in St. George's

Parish risk lowering the overall standard and decrease parent, student and community satisfaction. Many people in this Parish have built their lives around these small community schools.

In addition, this blanket approach is likely to cause problems for the St. David's community. Neighbourhoods with no schools are less desirable for homeowners and tenants. With the current proposal suggesting the closure of St. David's Primary School, it follows that the value of homes in the area will decrease. Landlords will suffer rent losses. Additionally, it is unreasonable to expect families with school children to add a 20 minute commute each way daily, to travel from St David's to East End Primary which is the current school proposed to stay open in St. George's The increase in traffic congestion through St. Parish. George's will be problematic. There will be 300+ parents and staff vehicles accessing the same drop-off/pick-up at the same time, as well as traffic to and from the St. Regis Hotel on the very same roads.

Increasing daily commutes, and potential reduction in property values, in a parish where the primary school education system is already working very well is another example of how nationwide reform does not positively impact all parishes. The initiative would further neglect the community of St David's, completely contrary to the Parish Proposal's goal of increasing community involvement.



Rather than use this forum to simply critique the Parish Proposal presented, we would like to offer our collective thoughts on both a different approach and possible alternative outcomes for consideration.

This proposed process involves a thorough, legally and morally acceptable consultation process, places reliance on only the most qualified education professionals, and, as a result, we are confident that the outcome will not only generate increased stakeholder confidence but also do a better job of meeting the many and complex objectives of education reform. In the short term, this may appear as though we are taking a step backwards — and this is most probably true, but in terms of long-term success, it is imperative that we fundamentally ensure we are building on a solid foundation.

"A child miseducated is a child lost."

- John F. Kennedy

1. Ensure the appropriate team is on-boarded to manage the process from start to finish

With the right guidance, we can have incredible impact on the children of Bermuda and their education. Education reform is one of the top issues for the people of Bermuda and after many years of inconsistency we must get this right. When reviewing almost 20 years of education reform documentation in Bermuda the one document that stands head and shoulders above the rest is the Hopkins report. This report is the only document that has taken a review of the current education system as far as to provide actionable recommendations for improvement. The team behind this report are, if anything, overqualified with over 150 years of experience and have held a range of prestigious positions. They are already familiar with the existing education system in Bermuda. Our proposal would, in the first instance, be to re-engage as many people as possible from this engagement to provide leadership, strategic guidance and oversight to a truly successful education reform pathway. If it is not possible to re-assemble the bulk of this team, then we should seek an alternative, similarly qualified consortium of professionals to stand in this role.

There will undoubtedly be a cost associated with this approach, however we will reap the benefits of this many times over as a result of much more considered and efficient implementation. It is also likely, as has been the case historically, that this team can be strengthened with valuable, invested and willing members of the community that would be willing to contribute to this effort on a pro-bono basis. As well as adding expertise at no cost, this inclusion will drive positive stakeholder engagement.

2. Revisit the consultation process

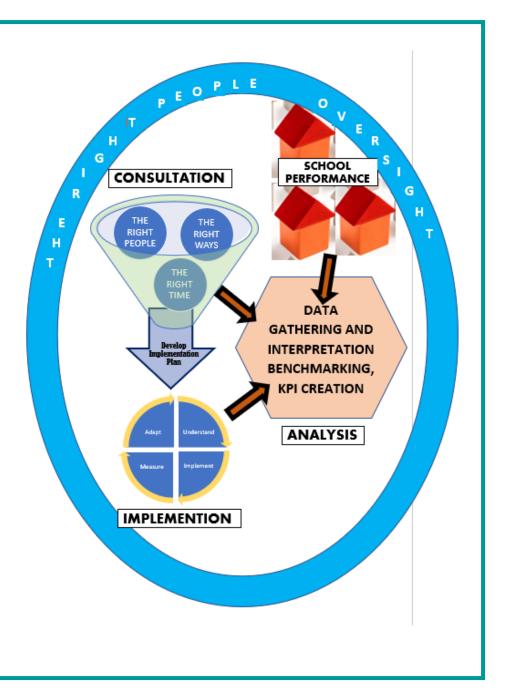
In line with best practice requirements, consult openly with all stakeholders as part of a process that is free from existing bias. Provide multiple platforms for communication, ensure all relevant stakeholders are included. Collate the results accurately for analysis, so that the outcome of this consultation drives the proposal.

3. Simultaneously with the above, ensure we are collecting sufficient quantitative data that allows us to truly understand how we are performing

Ensure a framework is implemented that gathers and publishes the same set of data for each school islandwide, at set time intervals. For decisions to be made on education reform it is imperative that we understand "Where are we now?" Once we understand this, we will be able to use this data to make much more intelligent decisions on the best way forward. It will allow us to make more specific, incremental decisions that will be both easier to manage and will produce targeted improvements in the areas we need the most. The ongoing nature of this framework will allow us to measure success and help us to understand which "levers" we need to pull to make methodical improvements throughout the education system.

4. Develop an All-Encompassing Implementation Plan that is Methodical, Strategic, Targeted and Flexible

This should cover all 5 of the inter-related Plan 2022 priorities, along with an understanding of sequencing and timing. It should contain incremental targets and milestones, predicted outcomes, an evaluation process that allows us to be able to understand the question "is



this working as we expected?", and the flexibility to change directions depending on the answer. Key information from this plan should be shared with the public to encourage transparency and accountability, and progress should be reported back periodically.

There are many significant initiatives currently being contemplated, and it is necessary to sequence these over a multi-year timeline so that they each receive the focus and commitment they deserve. Undoubtedly this will take longer to cross the finish line, but the focus should be on effectiveness rather than speed.

We believe the implementation of the above process will put us firmly on the path for successful education reform, and will appropriately drive the direction that Bermuda must take. We anticipate that some of the below examples must ultimately be considered.

Alternative Process Example

Stage 1: Phase out middle schools (for example, the current P4 class will be the first year to stay in Primary schools up to P7)

Stage 2: Review and analyze

Stage 3: Introduce Preschools into the current Primary Schools

Stage 4: Review stage before moving on to stage 5 and make any changes, updates with the above mentioned stages as they are.

Stage 5: Introduce Signature Schools (this in and of itself will have to be a phased in approach)

Stage 6: Review stage again

Stage 7: After all of the above stages have occurred and been analyzed, the Ministry will be in an informed position to make any necessary further changes.

5. School Closure Decisions Should Be Based upon Academic Performance

Implementation of a more rigorous framework for gathering qualitative academic performance data in a timely manner so we are able to understand with certainty where our performance is best. This approach would still support a similar consolidation effort, but would effectively allow us to start from a higher ground. It is much harder to rebuild successful schools in a new location amid significant change. It is not impossible, but subject to a higher risk of implementation failure.

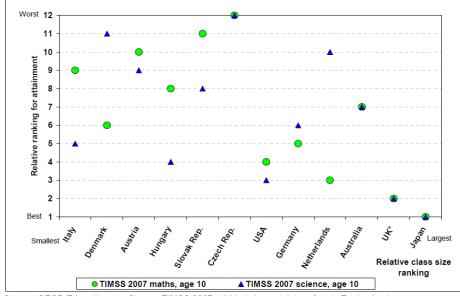
6. We should leverage existing research to support a new primary structure, as opposed to an arbitrary "Parish" School basis

There is little research to support the benefit of reducing class sizes as low as 15, and, on the contrary, much evidence to support that a smaller school improves academic performance. The Proposal essentially contradicts both of these facts and favors an arbitrary geographical methodology that is not supported by the plethora of educational research that exists.

In light of this, our proposal centers around maintaining the size of our current schools, but right sizing to respond to the declining enrolment rate. There are currently 23 P1 "streams" spread across 18 schools, and with current enrollment of 320 in P1 (and declining). Maintaining a class size of 18-20 children (which falls into line with the NCTE definition of a "small" elementary class being 20 or fewer children), this would allow us to reduce the number of P1 "streams" from 23 to 16-18, resulting in the removal of 5-7 "streams", which equates to a reduction of between 3-7 schools, depending on whether these schools are single or double tier. This would achieve operating savings, optimize classroom size for performance, whilst still affording students the benefits of being part of a smaller, more inclusive school.

Below is a graph taken from the UK Department of Research Education Standards Analysis and Research Division Report Titled "Class Size and Education in England Evidence Report (Report #DFE-RR169) that plots the TIMSS assessment score (an international indicator of educational achievement consisting of an academic assessment and also includes teacher, school and student questionnaires) against class size for 12 OECD countries, and concludes that there is little correlation between the two.

Figure 5-3 – Relationship between class size in 2004 and science and maths attainment in international studies in 2007, primary level, countries ranked on horizontal axis in ascending order of class size (left to right).



Source: OECD Education at a Glance, TIMSS 2007. * UK attainment data refers to England only

Conversely, there has been significant research undertaken in the US that concludes that smaller schools are in fact better. The below excerpt is taken from the Education Resource Information Center "Current Literature on Small Schools. ERIC Digest"

(ERIC Identifier: ED425049)

"The small schools literature began with the largescale quantitative studies of the late 1980s and early 1990s that firmly established small schools as more productive and effective than large ones. These studies, involving large numbers of students, schools, and districts, confirmed that students learn more and better in small schools (Lee & Smith, 1995). Students make more rapid progress toward graduation (McMullan, Sipe, & Wolf, 1994). They are more satisfied with small schools, and fewer of them drop out than from larger schools (Pittman & Haughwout, 1987). Students behave better in smaller schools, which thus experience fewer instances of both minor and serious infractions (Stockard & Mayberry, 1992). All of this is particularly true for disadvantaged students, who perform far differently in small schools and appear more dependent upon them for success than do more fortunate youngsters (Lee & Smith, 1995).

All of these things we have confirmed with clarity and at a level of confidence rare in the annals of education research. As one researcher summed it up, "a large body of research in the affective and social realms

overwhelmingly affirms the superiority of small schools" (Cotton, 1996b). Another researcher noted that size exerts a "unique influence" on students' academic accomplishment, with a strong negative relationship linking the two: the larger the school, the lower the students' achievement levels (Howley,1994).

Such quantitative studies have built an impressive case for smallness. And a number of literature syntheses and reviews have now displayed the findings of such extensive studies and the advantages of small schools (e.g., Cotton, 1996a; Gladden, 1998)".

(ERIC Digest - ED425049)

7. Running a Pilot Program

However the implementation plan sets out change, in any instances where we identify a consistent process across multiple locations we should consider a pilot scheme. Even with the most thorough plans and the most competent teams, pilot schemes repeatedly add value. Although the timeline may be extended, the specificity and impact of delivery will ultimately be improved. It would be logical to select one Parish for a pilot program. A successful pilot program will certainly increase public confidence and buy-in.

8. We should examine our current successes, replicate where we can, and consider expansion of the aided school model to other facilities

There is significant global traction in the education community that supports the aided school model. The governance structure is widely accepted to drive accountability and teacher performance, and thus positively impact students' academic achievements. On a local level, several of Bermuda's top educators endorse the same powerful notion - greater autonomy will benefit Bermuda's schools:

"All schools have the potential to perform...there are many factors that go into children's performance. It is not based on the physical plant; it is a function of the staff. What the [government-fee] aided schools have that the other [government] schools have not been afforded the right to is the autonomy of principals to pick their staff. That is the biggest difference. Principals need more autonomy and people need to believe in the public-school system."

Mary Lodge

(former principal of St George's Preparatory School)

"They have autonomy over enrolment, hiring of staff, and they have full responsibility for their payroll and premises."
--In the Context of Charter Schools
Becky Ausenda

(passionate education advocate of the Bermuda Education Network)

A model that is gaining popularity in both the US and the UK due to its academic success, is the Charter/Academy model, which relies on a level of Government funding comparable to public schools. However, the accountability and autonomy created as a result of this adoption has improved overall student performance. This would be an option for existing aided schools, (and this transition in reality would change little in terms of day to day operations), but also potentially could open the door to other charitable trusts who may have responsibility for one or more schools. From a Ministry of Education perspective, given the scale of the transformation ahead, this option would effectively reduce the number of schools and children that reform needs to touch, without causing additional capital or operating spend, allowing greater focus for those that remain. These schools would still be subject to the regulation and inspection criteria as other government schools, but may take less effort in terms of central management and therefore could actually result in centralized cost savings.

What is a Charter/Academy School?

- Government Funded
- Independent of Local Authority Control
- Terms are set out in individual academy funding agreements where accountability extends to academic, operational and financial performance
- Self-governing, non-profit charitable trusts
- May receive additional support from personal or corporate sponsors, either financially or in kind
- Do not have to follow the national curriculum but have to ensure curriculum is broad and balanced and include core subjects
- Subject to inspections in the same manner as all public schools
- Flexibility to be innovative

In the USA, between 1993-2009 the number of charter schools grew 10-15% each year. In the UK, academy schools grew from 200 in May 2010 to 4,500 in March 2015.



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