FEEDBACK RELATING TO THE DRAFT DOCUMENT OF THE NATIONAL EDUCATION STRATEGY 2024 – 2030

FACULTY OF EDUCATION

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1.0 Introduction

In an era marked by dynamic societal shifts and evolving global challenges, the formulation of a forward-thinking national strategy on education becomes imperative. Malta, echoing this sentiment, has laid out a National Strategy for Education (2024 to 2030). This feedback report aims to scrutinise the intricate details of this strategy, applauding its visionary aspects while delving into areas that warrant further consideration. This feedback serves as a critical examination of the proposed strategies and initiatives put forward in this document, and offers insights and recommendations aimed at further enhancing accessibility, equity, and quality education for all learners in Malta.

The commendable facets of the strategy are readily apparent, with its overarching emphasis on a holistic approach. The three pillars of well-being, learning and growth, and a socially just education system, underlined by the principles of equality and active citizenship, showcase a commitment to nurturing not just academically proficient individuals, but resilient, socially aware citizens. The incorporation of family-community-school programmes as the linchpin of this strategy reflects an understanding of the interconnectedness of these entities in shaping a student's educational journey. Moreover, the strategy's foundation on the transformative concept aligns with the dynamic needs of a rapidly changing world and strives towards achieving Sustainable Development Goal (SDG) 4 – Quality Education by 2030.

The strategy features a considerable degree of goodwill and positive intent to move forward. However, some of the proposed initiatives lack clarity regarding their specific components and their eventual implementation. The setting up of a National Learners' Wellbeing Unit that offers specialised service to learners, is a case in point.

A number of initiatives outlined in the document require a dedicated workforce. An example is the proposed linguistic, educational background and socio-emotional assessment carried out for international students. Notwithstanding its importance, this laborious task may present a number of challenges in terms of feasibility and resource allocation. The strategy does not indicate who will be responsible for such assessments or how they will be carried out. Such

initiatives would necessitate a thorough examination of the available resources.

The strategy features an undertone that prioritises a market model over the realities of stakeholders; teachers, LSEs etc. The strategy should clearly articulate the principles guiding the document and the philosophical foundations at its core.

1.1 The Three Pillars

The National Education Strategy 2024-2030 focuses on several key objectives. These are directed to transform and enhance the education system in Malta within the parametric qualities that make us humans, as articulated within the three strategic pillars below. The strategy proposes objectives directed towards the implementation of comprehensive and digitally mediated changes which will require significant resources and careful planning to avoid overwhelming students, educators and institutions respectively.

These objectives are centred within the three main pillars that include:

a. The Wellbeing, directed to enhance the mental, socio-emotional, and physical health of learners and educators.

It is reassuring to see how the strategy aligns with the forwarded notions of Education 5.0. In this case, the holistic developments are being directed towards the enhancement and merging of socio-emotional skills and other 21st century skills such as critical thinking, creativity, and problem-solving, augmenting them through the use of Technology Enhanced Learning without neglecting the wellbeing of both students and educators.

The fact that the strategy starts with the educators' wellbeing is commendable. By recognising educators as important role models, the Education Strategy underscores the importance of their wellbeing. It pledges to enhance job satisfaction and aims to make the teaching profession more appealing to prospective educators. The introduction of the Wellbeing Programme is a significant and valuable initiative, highlighting a holistic approach to educational excellence.

However, the document lacks a sense of organic development, as it perpetuates a medical model that accentuates deficits. While acknowledging the importance of addressing deficits, the strategy's

approach should pivot towards a more pedagogical perspective rather than adopting a medical model. Clearly, the document mistakenly views well-being as separate from pedagogy when in reality professional teachers, LSEs and education stakeholders should play a central role in providing initial assistance, support, and ensuring student well-being. Beyond founding a well-being unit for educators, it is crucial to identify the underlying difficulties and crises faced by educators. The proposed well-being unit could potentially serve as a research hub to explore the root causes of educators' distress. Well-being should be perceived not only on an individual level but also on a social level. The promotion of empathy through reflective processes within the curriculum is essential.

The Benesseri programme would have benefited from a clear definition and further information to aid understanding. Education is not merely about coping; it should aim to foster autonomy and agency among learners.

It is essential to clarify how autonomy for educators and schools will be implemented effectively. All education stakeholders should be empowered with autonomy, but any support provided should ultimately lead to the development of autonomous individuals rather than fostering dependence on support systems.

The "Stakeholder Engagement" and "Action-Based Strategic Orientation" sections of the "National Education Strategy 2024-2030" document continue to not explicitly mention languages or the teaching and learning of the Maltese language. The document emphasises the importance of stakeholder engagement, strategic orientation, foresight, and a cross-sectional and integrated approach. It also highlights the need for policy development to be evidence-based and for education to be ingrained within the realities of today's educational institutions and the social and global context. However, it does not specifically address the role of languages or the teaching and learning of the Maltese language in achieving these goals. It might be beneficial to include a section dedicated to language education, given its importance in communication, cultural understanding, and cognitive development. This could also address the specific needs and challenges associated with the teaching and learning of the Maltese language. The "Strategic Orientation and the Three Pillars" section of the "National Education Strategy 2024–2030" document continues to not explicitly mention languages or the teaching and learning of the Maltese language.

The document emphasises the importance of adaptability, the acquisition of basic skills, socio-emotional skills, civic duties, literacy, numeracy, and twenty-first-century skills. It also highlights the impact of the COVID-19 pandemic on education and the need for a person-centred approach. However, it does not specifically address the role of languages or the teaching and learning of the Maltese language in achieving these goals.

The Family-Community-School link programme should be expanded to the active encouragement and funding of school-based projects that engage the local community. Projects can also be funded that encourage communities to engage schools. For example, a part of a school (that can be isolated and separated from the rest of the school for security reasons) can be turned into a community garden that is open to community members and school staff and students to use to grow vegetables and fruit and herbs, these can be used by nearby residents or the school itself by the canteen or Home Economics. The Family-Community-School link programme should be linked to the open school and open science concepts.

b. Growth and Empowerment, *as continuous improvement and lifelong learning for both learners and educators by revising the National Curriculum Framework, implementing innovative teaching methods, and enhancing educational achievement through 21st century skills and digital literacy.*

This strongly promotes the importance of professional judgement among educators to enable a gradual shift towards a skills-based system. However, the current discourse as outlined in this strategy appears overly generalised. Growth should also encompass attitudes and not only skills. Hence, the document remains overly technical in its approach.

Furthermore, reliance on services should not overshadow the significance of fostering a learning community to support growth. The document should shift away from fragmented service provision towards a more cohesive approach that facilitates growth.

The plan to address challenges at the Malta Visual and Performing Arts College (MVPA) is important, particularly in the light of recent research leading to an Arts Council Malta-commissioned publication 'A Review of Arts Education in Malta up to School-leaving Age' (Vella et al., 2022).

This national report indicated various deficiencies in the provision of quality arts education, particularly in state-owned specialised arts (and other) contexts. The strategy's aim to develop specialised training even further by establishing an academy for the arts could also lead to positive results in this sector, though combining the visual and performing arts at this level might prove to be over-ambitious in the local context. Nevertheless, it is important to note that such an academy could present students attending the MVPA and similar institutions with a motivation for further study and specialisation, which would undoubtedly benefit the local artistic scene.

However, the wording of the brief section on the arts in the strategy is problematic because it does not refer to the arts as forming a crucial component in all students' wellbeing, empowerment, etc. Rather, it gives the impression that the arts cater only for talented students (attending specialised schools) both at the secondary and post-secondary levels, and hence implies that only changes within specialised arts contexts are required.

As the above-mentioned report and its fifty recommendations demonstrate, the arts and creativity should be central to any educational strategy, along with other skills referred to with some frequency in the strategy, like reading, active citizenship, sustainability and global citizenship. Unfortunately, the strategy's lack of reference to the value of creativity and the arts in students' general education and its focus on specialisation replicate popular perceptions about the use-value of the arts in society, further perpetuating an economy-driven, rather than inclusive or empowering, educational model.

In emphasizing key skills, creative and critical thinking are essential to mention. More emphasis on the arts, and the arts incorporated into other subjects like science or design needs to be emphasised for a more holistic educations (such as STEAM).

In the measure: "improved synergy between the education sector and the industry" we see communication skills as a key "soft" skill. We would add this skill alongside entrepreneurship. If you cannot pitch a Business idea how far can you go?

*c. **Equity and inclusion** namely promoting intercultural understanding and the addressing of diverse learning needs, and adaptations towards societal changes.*

Under the third pillar, education for inclusion should go beyond treating diversity as an issue to be addressed, as this perpetuates a medical model. Instead, diversity should be perceived as an opportunity for enrichment, with cultural differences viewed as opportunities for learning rather than 'sources of tension' as the document specifies.

The strategy should place a high priority on retaining long-term Senior Management Team (SMT) members within schools. Continuous turnover can unintentionally disrupt the coherence of the school's vision. Therefore, it is essential to implement measures that foster the retention of experienced staff, ensuring a more stable and aligned environment for the realisation of the school's overarching goals.

The strategy needs to explicitly mention LGBTQIA+, gender, minority groups in this objective. We would suggest that certain principles are transferred into concrete suggestions on how they can be addressed in action.

1.2 Emphasis on The Person

The emphasis on personal and individual goal achievement is an interesting aspect which is recurring throughout the strategy, suggesting that future educational policies may prioritise flexibility to accommodate personalised goals for every student. However, the strategies which will enable greater personalisation are notably absent from this document.

It is positive to note that the document claims that it puts the human person at the centre and that wellbeing is identified as the first of the three pillars, nonetheless the language used throughout the whole document is vague and may be easily interpreted in various ways. Once published, all strategies may be interpreted by the policy makers in any way that they may wish to. This is especially so since most proposals are vague and do not clarify the intentions of the authors.

The fundamental principle underlying this document appears to be advocating for remedial and individualistic approach wherein individuals lacking certain skills would be provided with necessary

support. However, this approach seems to be rigidly imposed, with emotional support being offered as an afterthought.

The current context of this strategy demands a paradigm shift towards a person-centred philosophy, yet this document appears to dilute this principle into individualistic perspectives. An anthropological consideration arises: Who is the individual we aim to educate? This existential crisis necessitates a deeper understanding of person-centred approaches and the human condition in relation to societal dynamics. The focus on agency and change should be on the present rather than the future, as the strategy itself states.

The three pillars which emerge are from a person-centred approach. The person-centred approach is an attempt to not limit educational institutions to academic achievement and instead embrace a more holistic approach to education. Historically, the person-centred approach originated as a guiding philosophical principle for psychologists and therapists to prioritise and identify individual needs and develop a strategy to cater to these needs.

Thus, while a person-centred approach can be beneficial when utilised in medical and/or psychological therapeutic settings, transference of this approach into educational settings requires a solid critical educational input, not to allow for the medicalisation or the marketisation of educational institutions where learners are perceived as "clients" (p.29).

A National Educational Strategy should aim to offer a holistic and critical educational experience, where learners are perceived as agents and active participants within a community-of-learners setting. Educational institutions as communities of learners are premised on recognising every individual within the educational institution as an active contributor and collaborator in the educational process.

The emergence of the three pillars from a person-centred approach, as presented in the document, is deficient in both the learners' agentic role and the organic social and community experience that educational institutions should offer.

   - *Wellbeing:* Focuses exclusively on the individual wellbeing and does not connect the individual wellbeing with the relational and social setting.

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- Growth and empowerment: Does not value education institutions (schools, classrooms and other educational places/institutions) as places that generate a sense of community and relationality. Growth and empowerment are intrinsic to human life's relational and social aspects; thus, prominence should be given to the community experiences that these institutions generate.

- Equity and Inclusion: Inclusion in the document is perceived exclusively as assistance and support to individual needs. No reference to educational institutions as places where learners learn to be inclusive. Equity and inclusion in an educational context should not be limited to the assistance of learners. They should include the teaching of equity and inclusion to support the development of agency and moral responsibility.

The qualifications of 'educators' at primary school level are also of great concern. Over the past years, too many people have been employed in primary education who do not hold a permanent teaching warrant. We are concerned by the increasingly common use of 'educators' instead of 'teachers'. It makes us wonder whether this is due to the inclusion of Learning Support Educators (LSE) or to detract from the number of supply and casual staff employed to occupy the role of 'teacher'. The roles of teacher and LSE are different so one would not expect them to always be referred to jointly as 'educators'.

Moreover, it is very worrying to witness the large number of unqualified 'supply educators' being employed within the pre-compulsory and compulsory early years of primary education. It is likewise of great concern that so many educators leaving the profession at unprecedented rates. If the country does not seriously invest in attracting and retaining teachers or educators in the educational profession now, then there will not be enough professionals to see even a part of this strategy come to fruition. Hence, all effort should be exerted to ensure that a suitably qualified workforce is in place, if the National Education Strategy for 2024-2030 is to be deployed and implemented successfully.

We are also concerned that we had not been consulted about the measure whereby an initiative to revise 'programmes being offered as Initial Teacher Education' will be one of the measures to be implemented.

1.3 Skills and Employment

If the skills are qualified as "important twenty-first century skills", the education experience is to be "holistic" and citizenship "active". In justice-bound jargon, the education system is to be "fair and just", ensuring "equal access to success" by "reducing disparities and inequalities, whereby each child feels a sense of belonging and is provided with appropriate opportunities."

On the strength of two other World Economic Forum texts, *Catalysing Education 4.0 Investing in the Future of Learning for a Human-Centric Recovery* (2022) and *Here's Why Education Systems Need to Start Taking a 'Skills-First' Approach* (2023), there is a declared belief in the professional judgement of educators, and the Strategy team is committed to offer all the necessary support so that there is a gradual shift towards a more skills-based system: "It is our aim to have an education system with a finer balance between knowledge generation and practical application".

The sciences (STEM) as a generic reference, as opposed to the arts (STEAM), are the winners in this document, perhaps because they are perceived as economically viable and serve well on the market agenda, as opposed to the perception of the arts as a hobby, a leisure-free activity, and a non-income or minimal income generator. The arts come across as the lesser-best option, despite some good intentions. By way of example, reference is made to Section 05, Pillar 2, Measure 1, p. 54.

> *Establishment of a Visual and Performing Arts Academy, as an expansion of the existing Malta Visual Arts School, that offers accredited programmes and qualifications up to MQF Level 5.*

Could the Talented Athlete Scheme, as spelled on p. 53, be replicated as a part of this section and be referred to as the Talented Artistic Scheme? If going to the trouble to establish an academy, why is it limited to offering programmes and qualifications up to MQF5? Perhaps an academy should be a subsidiary entity of MEYR and/or UM, with the ability to offer higher training aligned with the understanding of an arts academy—a prestigious and selective organisation similar to the professional sports ones.

Additionally, it is recommended that the National School of Performing Arts also be part of the MAV College. It should also include its own Year 12, perhaps as a subsidiary of the Academy and/or as its foundation pathway. The Academy, at all times, should serve as the national arts body, securing international standards and rigour while safeguarding, promoting, and nourishing local talent.

In Strategic Objective 1 of the Strategy as it refers to obligatory schooling, we get an idea of the client. The client becomes "human capital". All talk about values turns out to be human beings understood as carrying (and being) potential assets based on employers' demands and future labour market predictions. If we ignore understandable 'predictability' difficulties in 'difficult-to-predict' times, the theory defines human beings as capital just like other assets owned by employers. Finally, we get a structured concept in the Strategy.

Ownership of such a concept/thought is not difficult to discover. One of the phenomena we are currently experiencing is the accelerated rate by which change is happening. Solution? Any employer association's manifesto has the solution - upskill. We need skills for the geopolitical scenario that is "characterised by volatility and this necessitates the prioritisation of higher-order executive functions, transversal skills and mobilisation of knowledge that makes us resilient, flexible and future-ready". The source to this ubiquitous education strategy gem? The Ministry for Finance and Employment's 2021 report, *The National Employment Policy 2021 – 2030*.

The balance between individual development and economic human capital is dialectically solved in Strategic Objective 2 as the disquieting shift towards individualism, highlighted by the World Economic Forum (none other) in its 2015 *Could Our Growing Individualism Lead to Greater Dependence?* Describes how our young people "today live in complex and dynamic realties which require a high degree of flexibility, adaptability and resilience, key components in human capital development". To make the WEF's point, and the Strategy's point even more clear, there is a need to educate "the ability to connect to others, form meaningful relationships and navigate through insecurity and instability" as the "key transversal skills and social competences that are shaping the future of any workplace". Not so difficult to get the inspiration and social concern for human development after all.

1.4 Diversity

An SOP for potential cases of radicalization is needed. This is something which has been in the pipeline for years, but has never been implemented. Recognising radicalisation as a critical concern for international bodies like the UN and RAN, the SOP aims to heighten awareness among Maltese educators and school leaders about the dynamics of extremism and radicalisation. Many students become radicalised through online exposure to extremist content and the use of the internet for recruitment and propaganda. It is important to note that radicalisation can take many forms, and is not tied to one political or religious belief.

Considering the diverse student body in schools – suffice to say that one in every five students is not Maltese, not to mention students of dual heritage – it is very disappointing to see that the term "multicultural/ism" does not feature at all in the National Education strategy document. The third pillar argues for "a just education system" which "ensures that all students have an equal access to success" (p.9). It elaborates that success is more attainable when a child feels a sense of belonging. This sense of belonging is fostered, amongst other things, through the recognition of culturally diverse identities. Students need to feel 'seen', their culture, faith and language accorded the recognition and dignity they deserve. Such recognition needs to be addressed through a culturally responsive curriculum, policies and practices, aided by the continuous professional development of teachers, LSEs and SMTs.

The NES strategy cannot ensure an inclusive, equitable and quality education for all (SDG4) when 20% of students are absent from the narrative. Adding to this, the NES wrongly refers to migrant and refugee students as international students. The terms are not interchangable. Unlike international students, migrant students are residents in the host country. According to OECD, "International students are those who received their prior education in another country and are not residents of their current country of study".[1]

Therefore, it is important that these students are referred to by the correct terminology, since their needs are different from those of international students. This does not mean that migrant students all

[1] OECD (2024), International student mobility (indicator). doi: 10.1787/4bcf6fc3-en (Accessed on 25 January 2024)

have the same needs, since these are based on individual and intersectional factors, such as ethnic background, socio-economic background, age, and age at migration, for instance. What is for sure is that many of the migrant students would be at disadvantage when compared to native students. One example is their possible limited proficiency in the host language and/or languages of instruction.

OECD (2015) puts support for language learning of host country at the fore of academic inclusion. It also encourages schools to provide opportunities to students to maintain their native tongue. The proposed strategy does not have any provisions for such support. The NES speaks of assessment of migrant students prior to entering the compulsory education system. Such assessment, while necessary, needs to take into consideration the cultural, educational, and linguistic background of the students.

Even though the NES speaks of belonging, it does not address the issue of religious divesity and how most schools ignore this altogether, or take a tokenist approach. Most schools operate a limited tolerance towards the religious other and there exists very little sensitivity towards the religious needs of the non-Catholic students. To the contrary, we are witnessing a surge in religious practices – and those schools/who are sensitive (few and far between) do not have any policies to follow, thus taking ad hoc decisions on how to address the religious needs, or at least do not oppress, the non-Catholic students.

A multicultural community which promotes religious pluralism is one where a policy on religious and cultural diversity promotes respect towards and understanding among students and staff. It also provides guidelines on how to address the religious needs of the students.

The wellbeing of students is compromised when they experience racism, cultural racism and Islamophobia. Such behaviour towards them causes them to feel unsafe. Prejudice and discrimination based on 'race', culture, and/or faith impact learning, development, and achievement.

The NES highlights the importance of educational achievement which may be attained by an educational setting which is more inviting, equitable educational provision, as well as having a more cohesive and inclusive community. One, therefore, notices inconsistencies in such claims, since anti-racist discourse is totally absent from the strategy.

One is to note that while migrant students are barely mentioned, when they are, they are framed in a narrative of deficiency. This deficit

discourse locates these students as being responsible for the challenges and inequalites they experience in schools. Consequently, practitioners, policies and administrators are not held accountable.

The Strategy promotes a "sharpened awareness on how to deal with issues like radicalization" and the "creation of SOPs, available to all educational institutions on the steps to take when there is suspicion of radicalisation". One would have thought that instrumentalising education for work readiness (including interpersonal, and very personal features) was enough. Such anti-radicalisation crusades are incredibly ill-advised and how such an item was integrated into a Strategy of Education is of concern. The implementation of "anti-radicalisation" policies would imply policing for educators and a further serious risk for engaging with open, critical education since limits to what is and isn't radicalised, and what is permissible and not, can hardly be turned into a science.

1.5 Inclusion

The assumption that the existing inclusion model requires revision raises several questions. The strategy falls short of clearly defining the rationale for such a proposed change. The absence of a clear and consistent definition of inclusive education can result in inadequate resources, facilities, and specialised staff to support students with diverse needs and may, ironically, result in exclusionary practices such as (dis)ability grouping and segregation. We ask: what the vision of education and more specifically, of inclusive education, is this strategy promoting?

The term "inclusive education" has multiple definitions due to its broad and evolving nature. However, the multiple definitions can lead to confusion and ambiguity, making it difficult for educators, policymakers, and stakeholders to understand the core principles and goals of inclusive education. This can result in inconsistent implementation and inadequate support for students with diverse profiles. Furthermore, professionals with less in-depth understanding of inclusive education may report more negative attitudes and feel less prepared to implement inclusive practices. This can lead to a lack of commitment and dedication to inclusive education, which, in turn, can negatively impact the learning experiences of students.

A number of initiatives outlined in the strategy emphasise the expansion of services, but it remains unclear how these will be integrated and pushed into school settings. Additionally, the role of educators, and specifically that of teachers and LSEs, should be clearly delineated, as they are essential stakeholders in this document.

The lack of transparency regarding specialised settings raises concerns. Notably, the terms 'multicultural' or 'cultural differences' are conspicuously absent from the document.

Inclusion should be approached from an empowering and agentic perspective, that is integrated within pedagogy to promote a sense of belonging for all learners. Inclusion within an educational context should not be limited to the assistance of learners' needs; instead, inclusion as inclusive education should also envisage a pedagogy of inclusive, where learners learn to include. Thus, classroom pullout and segregated learning spaces do not fit the inclusive education model and should only be limited to exceptional situations. Furthermore, inclusive education is central to the formation of citizenship education, where educational institutions should offer a robust learning community to promote more inclusive and responsible citizenship.

Some definitions of inclusive education may not fully address the need for students with disabilities to be taught with their peers in a mainstream classroom for the majority of the school day. This can lead to segregation, where students with disabilities are isolated in special units or classrooms, rather than being fully integrated into the mainstream educational environment.

1.6 Teachers and Teacher Education

Initial Teacher Education (ITE) is included under the Strategic Objective 1: Educators' Wellbeing. It is unclear how it fits specifically under this objective.

Again, in relation to this, it must be reminded that ample space was dedicated to ITE, including teachers' qualification and requirements for warranting, in the proposed Profession in Education Act (2016). In this Strategy reference is made to "a revision of the programmes being offered as Initial Teacher Education, in collaboration with the University

of Malta (UoM), the IfE and the Malta College of Arts, Science and Technology (MCAST)". This raises the following questions:

1. Will these three institutions' ITE programmes be aligned, also on the basis of a mutually-agreed exit level qualification for teachers (Level 6 or 7)?

2. How will this "revision" occur in practice, also taking into consideration that the three institutions are governed by different regulations and bye-laws?

The following suggestions are therefore being proposed:

1. The formulation of national standards for ITE, based on quality education, needs to be given priority over the "revision" of ITE programmes. These also require consultation with major stakeholders. i.e. School Principals & Heads, teachers, students etc.

2. A framework then needs to be provided, on the basis of which institutions which are responsible for ITE will devise their programmes. This would need to include set parameters (e.g. time devoted to the practicum, criteria on how it is assessed, weight given to subject-methodology and educational theory study units) while also leaving space for these institutions to exploit their expertise for other areas of their programmes.

The Faculty of Education also proposes that Malta's national strategy for induction of NQTs (as described in the handbook by the Directorates for Quality and Standards, 2013) is developed further to focus on the development of policies for professional teacher learning that are coordinated, coherent, adequately resourced and quality assured. Teachers should have sufficient incentives throughout their careers to review their learning needs and to acquire new knowledge, skills and competences. For this to happen, there needs to be better coordination between the various strands of teacher education – from initial education, through 'induction' to in-service professional development.

It is also important that the actors in these systems share a common language about teacher qualities and an understanding of each other's

roles and activities. Coherence in the induction system requires mutual trust between all stakeholders (NQTs, Teacher Mentors, Head of Schools, Head of College Networks, experts in Initial Teacher Education, CPD providers, etc.) in the various phases of initial training and professional development.

It seems that the professional development opportunities that educators are currently being offered locally are still very much expert-driven, in the sense that we still seem to be assuming that teacher educators are there to 'teach' educators how to teach and/or how to run schools. Hence, addressing this measure and, more specifically, '*The provision of more relevant and evidence-based training*' requires a transformation in the way we see and enact CPD – from something done on teacher to a collaborative experience that is carried out with them.

Hence, we need to expose and engage educators to more collaborative models of CPD that engage them more actively in working together to identify issues with teaching and then seeking to find solutions that can work within their own school environments and classrooms. In other words, through collaborative CPD, educators learn to become reflective practitioners and researchers (for example, we can help them to use action research) of their own practices.

Rather than doing the research for educators, educators themselves need to be supported so that they could do it and value how such self-directed research may help them understand better the situations that they face and then attempt, with the help of outside experts, to address them by finding possible solutions. This transformation places educators as experts and helps them to gain the needed ownership so that they themselves can drive their own professional learning.

What we need is to expose educators (including school leaders) to collaborative and long-term CPD models and then provide educators with support structures that can help them become their own agents of the change. CPD needs to become an integral part of what educators do on everyday basis.

Overall, there is limited focus on the notion of leadership and being a leader. The need to link governance and leadership is also lacking. These are two central dimensions that are crucial for the strategy to succeed. There needs to be alignment between Vision, Strategy, Policies and Targets/Outcomes. This is fundamentally lacking.

For this to take place we need to focus on a leadership that engages, empowers educators working at the College/school level to take responsibility for their learning. There is nothing within the document that looks at the why, what and how the Heads of the College Network and Heads of School will be given the latitude to restructure their organisation.

A central and key aspect behind *Strategic Objective 3: Growth and Empowerment* should be the professional learning and development of educators. For this to take place we need to review our governance structures. We need to move away from a governance which is currently transactional to one which is transformational. We need a system that encourages greater College/school autonomy. This will help us move away from contractual accountability to responsive and reciprocal accountability.

Therefore, linking autonomy with responsibility and accountability is crucial. For this we need to include a measure and initiatives that see Colleges/schools transformed into Professional Learning Communities. This will help us redesign learning for all educators and for Heads/ Assistant Heads/ Heads of Department functioning as school leaders. Teacher learning needs to become job-embedded. This has been reinforced over the years by the OECD through their international studies (e.g. TIMSS, PISA). Furthermore, top-ranked nations focus on ensuring that schools become communities of practice and that school leaders are involved at fulfilling four domains of transformational leadership, namely:

- o Setting Direction;
- o Building relationships and developing people;
- o Developing the organisation to support desired practices; and
- o Improve the instructional programme.

The remit of successful school leaders and leadership therefore focuses on teaching and learning, on not only facilitating the learning taking place in class, but in the creation of learning opportunities for teachers to come together and constantly reflect and review their practices. Furthermore, school leaders need to be provided with varied learning opportunities that see them come together to share good practices, challenges that they facing to grow as a team or cluster.

On page 33 an outreach programme is suggested. Outreach means that you are giving a one way form of community from the ministry to others. We would suggest it is reworded to an Engagement programme to indicate that it will be a two way form of communication or dialogue.

For the measure, page 36, "A targeted promotional campaign on the teaching profession as part of the Ministry's human capital planning" we suggest that market research is done beforehand to identify the different potential target audiences that would be interested in taking a teaching profession. The market research needs to see how different target groups perceive the teaching profession and what would encourage them to take it up.

Any promotional campaigns for the teaching profession should be performed in collaboration with key stakeholders providing teaching education / training.

The only mention of the Council for the Teaching Profession (p. 36) refers to "a revision" of its aims, function and remit. In relation to this, it must be pointed out that in the proposed Professions in Education Act (2016), a whole section was devoted to the CTP (therein re-baptised as 'Educators' Council') in which its composition, functions, proceedings etc. were defined. Will the proposed "revision" take this into consideration, or will the process start anew?

Over the past years, to our knowledge, there was no mention of this proposed "revision" within the CTP itself. This body ought to be consulted, especially if its "remit" will be changed.

The current functions of the CTP, as established by the 1988 Education Act (Ch. 327, par. 27, p. 18) include regulating the practice of the teaching profession in Malta. It must be noted that this is currently a problematic endeavour, in the absence of nationally-agreed criteria on the standards expected to be reached by educators, both via their initial qualification, which introduces them to the different educational professions, and through continuing professional development.

1.7 Higher Education

The main institutions of the tertiary sector are sidelined. The isolated references to *tertiary* are indicative however of the role of the political state, and is the consideration that it is the third tier of the state-regulated education system. A mapping exercise of all the initiatives in the education system, from childcare to tertiary settings, was being carried out by the Ministry and the primary goal was the improvement of cross-functionality. One cross-functional challenge is how the National Education Strategy 2024-2030 "will merge with and consolidate the major objectives of the five documents complementing it, namely A Quality Assurance Framework for Education in Malta (0-16 Years), National Quality Standards in Education (3-16 years), Early Leaving from Education and Training Strategy (2023-2030), National Lifelong Learning Strategy 2023-2030 and the Digital Education Strategy (2024-2030)". This is not addressed.

Another similar need for cross-functionality not addressed is the requirement to maintain communication lines among the array of institutions mentioned in the document even if limited to what concerns the tertiary sector. How will they be networked and such a network rendered sustainable? Among others, the document refers to the Ministry for Economy, European Funds and Lands; Ministry for the Environment, Energy and Enterprise; Ministry for Finance and Employment; Ministry for the Home Affairs, Security, Reforms and Equality; Ministry for Health; Ministry for the Home Affairs, Security, Reforms and Equality; Ministry for Inclusion, Voluntary Organisation and Consumer Rights; Ministry for the National Heritage, The Arts and Local Government; Ministry for Social Policy and Children's Rights; and, Ministry for Social and Affordable Accommodation, Ministry for Tourism.

Financing the tertiary sector and academic system within, continues to be the crucial responsibility of the state. It is also, in different ways, regulated by the state. The Strategy itself is one other means. However, and indicative of the state taking a step back, there is no clear overall plan. The governance of the sector requires further thought. Meanwhile, the management of public money pumped into what are in terms of outcomes, clearly related to private interests, continues. It is accompanied by an increasing financial dependence on EU funding.

A very serious absence is the silence on the professional workforce within tertiary education. There is no reference to the tenured-casual divide, and the growth of short-term precarity. The abysmal social divide created by the distinction between the professors and the rest, including not least, the forgotten administrative staff, is negatively impressive. This is paradoxical when one considers the Manichean interests of the Strategy in the formation of an economy-ready workforce formation.

The 'business' context of university education is not restricted to the realisation of the booming and ongoing exercise of heavily neoliberalised spaces created for consumption and commerce, or the other local favourites namely the fixed capital produced by development and construction; it is also characterised by the proliferation of private forms of universities. The medical sector is a case in point. It is not alone.

At the same time, core education functions have to compete for financial support, not always successfully, as sport and leisure facilities, student and foreign academic accommodation, medical centres, etc., garner more support than other Cinderella branches of knowledge and research.

Strangely, there is nothing in the Strategy about all this even if, one has to remark, the University has already anticipated the Strategy's call for infrastructural projects that "ensure[s] embellishment works".

2.0 Curricular Areas

Strengths include:

- Measures that seek to address overlap and overload of content;
- Attention to alternative formative and summative assessment;
- Attention to AI;
- Attention to the Maltese language, also through digital investment;
- Measures/initiatives that seek to prevent ELET, and through alternative and accredited   programmes;
- synergies for trade and entrepreneurship between FHE institutions (p. 55): MCAST, ITS, UM, albeit without mention of what role could be played by and with the IFE and the IPS in this regard!

The Introduction of Ethics as one of the option subjects at Secondary level. This is a very positive development. Parents have often expressed the wish for their children to take Ethics without dropping Religion. The Education Strategy proposed a way for this to happen in Secondary school. Ethics is a subject which fosters values and critical thinking skills, which are very valuable in their own right. It is also deals with very topical issues related to digital citizenship (e.g. the Ethics of AI, respectful online behaviour, hate speech, extremism, etc.).

Opportunities include:

Complementing "(t)he incremental increase of reading time across the Early Years" (p. 49) and "The learning gap is narrowed at Primary School level" (p. 50) with less formal spaces and modalities of discussing literature and narratives, e.g., book club and human library sessions integrated within the weekly classroom / school day schedule and/or afterschool. This should include opportunities for the participation of family members.

Adopting a Participatory Action Research (PAR) design for the "(r)esearch on the use of Artificial Intelligence (AI) technologies by educators leading to a set of guidelines and good practice" (p. 49) to enhance the ownership of such guidelines. Participants of the PAR would include educators and families. Output of this research can include a framework for CPD on AI for educators and families and the setting up of a community of trainers who will include research participants.

Quality Assurance of FHE (p. 53) can consider specialisation of educators in these sectors, in collaboration with the Faculty of Education of the University of Malta. The Faculty is currently developing targeted and diversified programmes of study, suitable for educators who are newly qualified or at more advanced career stages in the formal and non-formal FHE sectors, that will be offered via flexible online / hybrid course, certificate and stand-alone modalities.

Adding SMART objectives of infrastructural and professional development investment in the measures and initiatives concerning sports, Arts-education and AI, particularly those detailed in pp. 49, 53-54.

Important limitations include:

There is negligible integration of the "Family-Community-School Link Programme" (notably described as "the linchpin of the strategy" on p. 9) in the measures and initiatives detailed in this whole section Chapter 5, Pillar 2 – Growth & Empowerment. This suggests a corroboration of the broader and long-standing gaps in lifelong education, particularly that which is not driven by employment.

To this end, changes proposed in the *National Lifelong Learning Strategy 2023-2030,* such as the professionalisation of the adult educator in Pillar 3, are welcome. The *Education Strategy 2024-2030* under review herein is limited in tapping opportunities for convergence. Some examples of such opportunities are mentioned in the last section of this response.

Measures and initiatives risk superficial / cosmetic address throughout the Strategy implementation years, unless these are pegged to SMART objectives. This is particularly the case for measures and initiatives related to in Arts-education, sports, AI, Klabb 3-16 and FHE.

Examples:

> * p. 49 where with respect to Klabb 3-16, the Strategy is limited to "rebranding" rather than targeted participation rates and from which social cohorts (students and families); and/or investment in the PD of Klabb 3-16 HR; or in needs analysis / evaluation research OR programme development for Klabb 3-16;

> * p. 54 "Establishment of a Visual and Performing Arts Academy" with no specification as to whether this will be an "on paper" change or an actual physical/hybrid academy with state-of-the-art infrastructure that is quantified with % increase in spaces / equipment / investment etc., this in the light that infrastructural limitations emerged as one of the most damning shortcomings of the current provision in the recent study, Vella, R., Brown, M., Xuereb, K. & Cauchi, L. (2022). *A Review of Arts Education up to School-leaving Age: Research Project Report.* Malta: Arts Council Malta / Malta University Consulting.

There is no mention of the role that the Directorate responsible for Research within MEYR can have in the steering / support / other role pertinent to any research-based measures / initiatives detailed in this Strategy; particularly measures and initiatives detailed under Pillar 2 – Growth & Empowerment (under review herein).

There is a mention of the Learning Outcomes Framework Survey, which underscored the fact that professionals in schools want us to place greater value on stakeholder communication, especially through direct involvement in the decision-making mechanism, for the benefit of all learners.

One may ask, how are the stakeholders involved? How are the learning outcomes which aim at linking schools to the outside world linking some of the outcomes to industry and further education? And why is it that a system that was aimed at decentralising, now presents set lessons to all teachers irrespective of culture, ability and link to previously achieved outcomes? Where has teacher autonomy gone? Initiatives such as the Ħidma Kollaborattiva in the teaching of Maltese, for example, are killing all teacher initiatives and consider students' learning processes to be sausage machines where one size fits all.

Although there is a mention of learning outcomes:
> a. There is no mention of student input achievement and there is no mechanism that ensures a link between the different phases of a student's schooling. Teachers look at their outcomes for the year with hardly any information regarding what outcomes have been previously achieved;
> b. School-based assessments which have been linked to the learning outcomes are putting additional pressure on our students due to an increase in (formal) assessments as opposed to what the learning outcomes system truly advocates.

Open schooling concepts and open science concepts should be embedded in the school/college's ethos and culture.

We recommend:
- o Embedding Transdisciplinary education in formal learning. With the current curriculum and institutional structures, it is very difficult for a dance teacher to collaborate with a science teacher to setup a theatre piece for the community that the students also learn from: this could help creative, critical thinking;

- o Embedding STEAM pedagogy and processes in formal, informal and non-formal education;

- Project based learning and open ended pedagogy. There should be active support to encourage learners to work with researchers, educators and members of their community to enact research within their community and use this to improve the wellbeing of all in the area. For example, the Vuċijiet Beltin project, saw University of Malta researchers, artistic practitioners and science in the city work together in order for school students and educators to do research in their area, present this research to the Valletta mayor and setup a play for the community in a community theatre.. These sort of projects need to be embedded in the school processes, not one off externally funded events;

- Creative and critical thinking should be embedded in curricula and in the process of education;

- Supporting initiatives that promote lifelong learning through informal and non-formal education.

The EU level targets are good. What we can also add is that we rank above EU average in PIMS and TIMMS scores. We also welcome more diverse assessment methods and move away from sit down exams.

Science (STEM / STEAM) education and research (performed by students as part of their learning experience) are not mentioned extensively in the document. These need to be emphasised. It is mentioned for scholarships, which is to be applauded but this is not enough on its own to encourage STEM education and career uptake.

Should the Trade Institute be incorporated into MCAST which is its original idea of setting up?

There is no strong department or strategy document that will incorporate research (and innovation) processes and learning within education.

2.1 Adult Education

The document serves to keep Adult Education on the agenda. It ignores, however, published and non-published Malta-related research in the international lifelong learning literature.

The document mentions our small percentage of people actively pursuing adult education according to statistics provided by Eurostat. It however ignores one important insight from the Borg et al (2016) study concerning non-quantified uptake of informal provision through intergenerational learning in the family especially with regard to ICT. A lot of non-formal and informal adult and also initial learning occurs beneath the radar and eludes measuring mechanisms.

The main positive point about this document is its rather belated embracement of the 'learning city', promoted by the EU. Like most master concepts promoted by international organisations such as UNESCO previously (the ' Learning Society', [Wain, 2004], or the EU later, let us not treat these concepts as new.

The challenges of an ever evolving multi-ethnic or multicultural society, marked in the latter case, by gender, class, age and racial/ ethnic differences, are given short shrift in this document. The great challenge for lifelong education at all levels, among children and adults, is to engage in and foster interpersonal and inter group understanding among persons who are different but not antagonistic. What role does lifelong education play here? How can community centres, such as schools as lifelong learning community centres, or other community centres and people's museums serve as hubs for intercultural dialogue, where people from the different genders, classes and ethnicities in society teach and learn from each other?

2.2 Early Childhood

A noteworthy observation arises when examining the strategy: a seemingly minimal reference to the importance of the roots of the education system – the early years. As we navigate the terrain of educational improvement, the question looms large: how can we not prioritise the foundational years if we seek a holistic and lasting enhancement of the educational landscape? This report endeavours to unravel this apparent oversight, exploring the implications and proposing considerations for a more comprehensive and inclusive educational strategy that nurtures the roots for the achievement of proposed targets and sustained growth.

A critical examination of Malta's National Education Strategy for the period 2024-2030 reveals a significant focus on compulsory schooling, as evidenced by the strategy's pillars centred around the belief that basic skills, socio-emotional skills, and civic duties are primarily acquired during this phase - compulsory (p. 26). This focus is further emphasised through proposals for an increase in the time and quality of physical activity in compulsory schooling (p. 42). The strategy, as articulated on page 52, does acknowledge the importance of improved quality in pre-compulsory settings, suggesting a revision of quality standards, a more robust legislative framework for 0-3 years, and continuous professional development for the workforce in these settings. Yet, it is imperative to question the placement of this statement within the document and the exclusive emphasis on the 0-3 age group, rather than the 0-7 age group.

The recognised significance of the first seven years of life, endorsed in various European documents, underscores the need for a more comprehensive approach, encompassing the 0-7 age range. In addition, European directives, including the European Pillar of Social Rights and the Charter of Fundamental Rights of the European Union, affirm the right to affordable and high-quality early childhood education and care (ECEC) for all children.

Additionally, international agreements such as the United Nations' Convention on the Rights of the Child and Sustainable Development Goal 4.2 emphasise the importance of access to high-quality early childhood development, care, and pre-primary education by 2030. Hence, the current strategy's limited emphasis on the early years raises questions about the feasibility of achieving and sustaining proposed targets. Advocating for a holistic approach, it is essential to extend the strategy's vision beyond compulsory schooling and integrate a comprehensive perspective on ECEC, that places priority on the 0-7 age range. Furthermore, to ensure alignment with the strategy's objectives, the establishment of a Ministerial Early Childhood Education and Care (ECEC) Advisory Group is recommended. This group could play a pivotal role in prioritising multisectoral action (National Policy Framework ECEC, 2021) and ensuring that the early years education (0-7) is not just acknowledged but actively integrated into the overarching educational strategy.

We believe that having a well-defined and forward-looking strategy is a pivotal stride in working towards providing a quality education to all

children. Children have a right to a quality education, and we welcome any improvements towards this end. However, the document does not directly discuss how to provide a quality education or how to bring back the levels of attendance to those attained during pre-Covid times.

We are encouraged by the inclusion of the three main pillars in the National Educational Strategy 2030, namely: (i) growth and empowerment, (ii) well-being, and (iii) equity and inclusion. A holistic approach to the well-being of children, families, and educators is necessary now more than ever. In the light of the multifaceted changes posed by shifts in demographics, swiftly changing cultural and linguistic landscapes, together with disruptions evoked by the pandemic over the past few years, have added new layers of challenge to the provision of a quality education for all children.

Target 1 of the EU Level Targets 2030 (Council Resolution 2021, Towards the European Educational Area and Beyond 2021-2030) states that:

1. *By 2030 at least 96% of children between 3 years old and the starting age for compulsory education should participate in Early Childhood Education and Care.*

Over the years, the percentage rate of attendance of children in KG I and KG II has diminished. The Covid-19 pandemic played a contributory role in the reduced number of children being enrolled in childcare or Kindergarten. The number of children of pre-compulsory school age in Malta has increased considerably due to migration and the diverse cultures and traditions of families may impinge on whether young children are enrolled in early childhood education and/or childcare settings. An OECD report (2018) clearly indicates that more Maltese (90%) than migrant children (80%) attended preschool education in Malta at the time. The figures currently available are not clear as

they vary according to the admission of children into KG preschool at different intake intervals throughout the year.

According to Early Childhood Education Statistics published by Eurostat, for the year 2021, 86.2% children aged between 3 and 5 years in Malta were enrolled in pre-primary education (Eurostat Statistics Explained, Nov 2023). A discernible decline in children from age 3 to

the start of compulsory education is evident from Year 2016. This information is depicted in the graph below:

(Info from above graph: 2014 95.5%; 2015 96.8%; 2016 95%; 2017 93.2%; 2018 93.8%; 2019 91.9%; 2020 89.1%; 2021 86.2%).

We really expect to see more importance given to pre-compulsory years (0-5) as the foundation for children's education in this strategy. Despite the evident focus of Target 1 above, this is sorely under-represented in the rest of the document. There is an urgent need for monitoring of quality and standards at this level given the discernible disparities in the quality of various childcare centres (0-3 years).

The age cohort encompassing 5 to 7 years, constituting the early years within compulsory schooling (Years 1 and 2), merits increased scrutiny to effectively build upon the foundational elements established in preceding years. The learning programmes are still coming across as highly prescribed. Unfortunately, the introduction of a child-centred emergent approach to the curriculum seems to be at a standstill. We urge authorities to prioritise this area and ensure educators hold a degree in education and/or early childhood education and care. A clear national qualifications framework is imperative to ensure that all educators and teachers attain a predetermined professional standard at the commencement of their employment. Furthermore, there is a need for a comprehensive professional programme to facilitate and encourage ongoing professional development for both novice teachers (NQT) and experienced educators throughout their careers.

Page 26 of Malta's National Education Strategy for the years 2024-2030 draws attention to the importance of literacy and numeracy as basic skills, aligning with the global emphasis of Sustainable Development Goal 4. However, for effective teaching of these foundational skills, it is imperative to draw insights from research, particularly studies that

incorporate young *children's feedback* on their learning experiences. Bonello's local research in 2022, for instance, delves into this crucial aspect, shedding light on how young boys respond to highly-formalised literacy instruction and learning experiences from their earliest years. Their voices, so far, have been silenced. All children have the right to participate in decisions that affect their lives. Therefore, such research should be emphasised in the strategy to ensure that future actions are grounded in democratic and socially-just decision-making.

The strategy further emphasises the significance of achieving at least a minimum proficient level in reading and mathematics, as outlined by SDG4 on page 27. Meaningful, contextualised, and playful pedagogies in early childhood are fundamental in laying the groundwork for sustained intrinsic motivation toward literacy, numeracy, and other learning domains. Research suggests that low-quality early childhood education, and the push-down of highly-formalised practices in early years, may inadvertently focus on extrinsic motivation and decontextualised practices, potentially stifling children's innate desire to become literate. For comprehensive progress in this strategy, a unified and child/student participatory research-informed stance on early childhood education and beyond, is indispensable. Furthermore, integrating ECEC experts into decision-making structures, also when it comes to specific areas of learning such as literacy etc., will ensure that the strategy aligns with the principles of quality early childhood education, ultimately contributing to the holistic well-being and development of every child in Malta – one of the fundamental pillars of this strategy.

The strategy acknowledges the importance of holistic experiences for students (p. 28), but it is essential to recognise that true holistic development begins in the early years. The brain's foundational development during this period emphasises the need for high-quality ECEC to promote optimal cognitive, social, and emotional growth. The National Policy Framework for Early Childhood Education and Care (ECEC, 2021) advocates for a multisectoral approach to improve the quality of ECEC. Aligning the implementation of the national educational strategy with this framework ensures a comprehensive and sustainable impact, addressing the targets not only for the next six years but also for 2050, cultivating a "future-ready nation."

2.3 Health Literacy

A holistic approach to overall health literacy is missing from the strategy. The need to develop a comprehensive and integrated approach within the education strategy that focuses on holistic well-being, including mental, physical and emotional aspects and not excluding overall health is needed. By integrating a holistic health education into the education system, one can create a comprehensive strategy that addresses the diverse needs of students and promotes their holistic well-being.

Establishing a holistic well-being framework and integrating a well-being education into the mainstream curriculum across all levels, from early childhood education to post-secondary, through age-appropriate modules that address emotional intelligence, physical health, mental health and interpersonal skills.

The strategy does not highlight action for activities and modules that specifically offer a health education curriculum through: physical education, overall fitness, nutrition, and knowledge on how to make healthy lifestyle choices.

When discussing holistic wellbeing, importance to ALL dimensions is key. It is laudable and timely that mental and emotional wellbeing are emphasised; however physical wellbeing should not be limited only to physical activity but also food and nutrition. Although the physical aspect is included under the wellbeing pillar, it skews mainly towards mental wellbeing.

One needs to look at both the quality of the food environment in schools and also the presence of food and nutrition in the curriculum. Both of these are very pertinent with regards to the increasing prevalence of NCDs (Non Communicable Diseases) among youths and in the preparation of schoolchildren for independent living – essential life skills. Worksite health promotion could also be initiated for the school adult community (all staff) in order to offer guidance on lifestyle choices which can facilitate physical (e.g. healthy eating), mental (e.g. time management) and emotional intelligence and wellbeing (e.g. communication).

Students are entitled to food and nutrition education programmes

throughout their compulsory education. Poor food choices and eating behaviours are key determinants of obesity, cardiovascular disease, diabetes, high blood pressure, etc (NCDs). The prevalence of NCD in Malta is high and education starting from the early years is key to aid in their prevention and to nurture healthy lifestyles. There is no mention of food and nutrition education or attempts at food and health literacy programmes. The focus on health in the document is more on mental well-being. This omits addressing important aspects of education for health such as diet and nutrition. At this stage, especially in the primary level food education including cooking skills is lacking, teachers' content knowledge in the area is limited and often self-taught, and no structure exists for a curriculum on food and nutrition. Research conducted by Piscopo and Mugliett (2022) offers this evidence.

Incorporation of units on healthy lifestyle, with clear learning outcomes and related project based assignment, in the After-Schools Programmes: This initiative is appropriate and its project-based approach has the potential to foster critical, decision-making problem-solving, teamwork, organisational and practical skills. Schools provide a useful setting for food skills education. School food and nutrition curricula have the potential to effectively communicate healthy eating messages and to reach all students and their families. Healthy lifestyle education should be an entitlement for ALL students. It cannot be limited to only those who choose to participate in After-School Programmes.

Examples of programmes are food preparation, cooking and storage skills; sustainable shopping practices; personal finance and budgeting; such as the project-based 4-H programme implemented in the USA. Wherever 'healthy lifestyle' is mentioned, the focus seems to be on physical health from the physical activity and mental health perspectives.

It is unclear what the healthy lifestyle units will actually cover. Well-being needs to be addressed more holistically, throughout one's compulsory schooling, and include diet, sustainable consumption, health promoting leisure time activities and how one can improve quality of life at an individual, family and community level.

One could also extend the After-School Programme/s to involve family members. This could also be part of a nationwide campaign or project to improve families' quality of life as part of a national, public well-being vision.

The focus on capacity-building recognises that education must address emerging needs for learners of all ages and thus requires that teachers are involved in ongoing professional development. Capacity building in the area of food literacy is essential as evidenced by the lacuna which emerged from recent research with local Primary school teachers (Piscopo and Mugliett, 2022). This study also showed that some teachers were very interested in such CPD.

Comprehensive programmes in the area of promotion of healthier lifestyles, including healthy diets, are required and should be implemented by trained teachers whether at the Primary or Secondary level. Initial Teacher Education and CPD in the area is therefore crucial.

There is a lack of a focal person for food literacy and healthy lifestyles in Primary schools in particular. One idea could be to start offering mini-specialisations for Primary teachers in different areas including food literacy and healthier lifestyles. Modules could be offered during ITE or CPD.

Introduction of quality accredited programmes in every Primary school, as part of and complementing the Learning and Assessment Time established by the Ministry, with a particular focus on programmes that enhance wellbeing, active citizenship and sustainability / green skills: This initiative is also potentially very beneficial, particularly due to its multiple wellbeing focus and its integration from the Primary level.

To maximise potential of these accredited programmes:

> a) They should not be limited to the natural environment and citizenship in the community development sense, but also include economic aspects such as financial literacy and sustainable consumer skills.

> b) They should not be limited to the Primary level but be a comprehensive programme running through all the years of compulsory schooling.

Building on previous recommendations, such as the need for education on healthy and sustainable food and nutrition practices, financial literacy, sustainable consumer skills, all of which could lead to an improvement in the quality of life of individuals and families, these

accredited programmes could incorporate a set of modules under the umbrella of

Home Economics. Offering Home Economics education as from the early years could be a foundational step to nurture responsible, healthy and active citizens.

The emphasis on growth and empowerment of school children within a lifelong vision for education is commendable and can help ensure a thriving and prosperous nation in the future. Different initiatives mentioned in the Strategy, e.g. the After-School Programmes, the CPD can all feed into this growth and empowerment objective. However, there also needs to be greater attention to the needs of youths, both those in education settings and those who are already in employment.

Through collaboration with HE institutions and/or with NGOs, lifelong learning initiatives could be offered to these youths. In order to address current socio-demographic trends where many young people are choosing to leave their family home and live independently or go to study or work abroad, skill-based learning on how to lead quality, healthy and sustainable lifestyles could be initiated as part of a so-called 'Enrichment programme'. This could be included as part of the Systems of Knowledge programme at post-Secondary level or through different youth hubs (e.g. Aġenzija Żgħażagħ or NGOs). This type of education is often called 'adulting' in international settings.

In addition, there are several life skills which could be targeted in such programmes which could better prepare youths for future couple relationships and family life, and include skills such as money management, time management, communication, basic parenting etc.

It is positive to see that schools are seen as ideal settings for the transfer not only of academic subjects but also of basic skills for life, including citizenship. Building on subjects that are already part of the curriculum such as PE and Home Economics, would be practical. It is important to acknowledge and work upon these aspects of human holistic development. Physical Education is well-positioned to contribute towards all three by tapping into various domains.

It is positive that the strategy recognises the need to equip students with the necessary skills to assimilate knowledge and skills and use them to adapt in the future. The cognitive process of problematising, analysing

and devising solutions to perceived problems within one's contextual environment, needs to be one of the main pillars of contemporary education. It is essential that this is highlighted and worked upon by students from a very young age. This strategy can help reinforcing the following skills: problem-solving, critical thinking, project-based learning, resilience building and exposure to diverse experiences, interdisciplinary learning, flexibility in assessment, technology integration, team collaboration, emphasis on lifelong learning, cultural competence and emotional intelligence.

Increased support and PD opportunities for teachers with the aim of increasing job satisfaction, and ultimately retention (p.33/34): What is important is not the increased opportunities, but the improved quality of PD opportunities. Teachers need to be given increased ownership of their own learning and the possibility to identify their own learning needs. Additionally, transformative types of professional development are encouraged to increase relevance of learning to teachers' needs.

A revision of Initial Teacher Education to include an evidence-based approach in ITE programmes is good. A roadmap needs to be created with regards to which courses provide accreditation to prospective teachers, supply teachers, and as continuous professional development and that institutions in such a small country do not overlap but offer different courses eg. the IfE should concentrate more on PD than ITE.

This is the first time in the document that the physical is specifically included in the document. It is evident that Physical Education can play a fundamental role in physical, socio-emotional and mental wellbeing. Yet, it emerges that the document puts more stress on physical activity levels/frequency than the quality of physical education lessons. Increased amounts of physical activity are essential for physical benefits. Yet, much more can and must be done. There seems to be the assumption that engaging in physical activity will automatically lead to benefits as if by magic, when physical activity and sport, unless intentionally used as a vehicle for holistic development, can give unintended messages to students that are counter to holistic wellbeing. Obesity is not the only NCD that is highly prevalent in Maltese children. It might be more accurate to also include/mention diabetes, high blood pressure, cardiovascular etc.

Increasing the amount of both physical education and physical activity is the first step in an important process. Quality needs to be improved

too, with teachers being given ample resources and ample professional development opportunities in order to be in an ideal position to make sure PE lessons are contributing towards the expected outcomes.

We believe that the core PE syllabus should take priority. However, PA programmes may be offered as an additional opportunity to meet the daily target of daily PA. In other countries, they aim to have 30 min during school hours, 30 outside. Compulsory schooling can benefit from before, during (which includes break-time and free lessons) and after school physical activity provision. It is essential that such provision falls under the remit of qualified Physical Education teachers, where physical activity and sport is used as a vehicle towards educating individuals about aspects of holistic wellbeing.

Studying the possibility of having more staggered breaks throughout the school day can increase the availability of space for students to engage in physical activity. Having a huge number of students having break-times at the same time is detrimental towards their effective engagement with physical activity.

The wording in the strategy needs to clearly distinguish between physical activity and physical education. The two are not the same thing. It is suggested that both Physical Education lessons, as well as opportunities for physical activity within and beyond the school day, need to increase in parallel. It is suggested that a minimum target of Physical Education lessons is outlined in the document.

It is strongly suggested that a committee is formed to determine the type of facilities that each school should have, with a clear time frame for their completion. Legislation should be proposed to enforce that each school should have, at least, an indoor space, big enough to accommodate a number of Physical Education lessons and additional physical activity opportunities for students. Inclement weather has resulted in too many Physical Education lessons being missed and students being sedentary during break-time.

Incorporation of units on healthy lifestyle, with clear learning outcomes and related project-based assignment, in the After-Schools Programmes (p.42): Although it is beneficial for extra-curricular and After-School physical activity Programmes to work towards and reinforce learning outcomes, it is the remit of PE teachers to work towards Physical Education learning outcomes during PE lessons. There must not be a scenario where students not opting to engage in before or After-School Programmes, to be put at a disadvantage by having PE lessons that do

not work towards all the stated learning outcomes in the framework. It should therefore be specifically outlined that such units should have different learning outcomes when compared to Physical Education.

People working with students in such programmes need to have the minimum pedagogical qualifications to work on such programmes. In light of having so many non-qualified people taking leading roles in the provision of physical activity means that they lack the required pedagogical understanding of using physical activity as a vehicle for students' learning regarding wellbeing.

National tournaments: This should not be for the better-abled students only at the expense of the lesser-abled. A distinction needs to be made between physical activity whose aim is general wellbeing and performance sport. If this is not the case, these tournaments will target the same students who are most probably already competing at higher levels with various sports clubs. In addition, teachers accompanying these students are leaving a number of lessons that are not catered for. In this sense, those who need more are getting less.

It is strongly suggested to include grassroots festivals and experiences that encourage mass participation, preferably happening within the school. This is one way of catering for those students who are disengaged from and unmotivated by physical activity. Some students are simply not attracted to traditional physical activity, games, competition etc. We may need to think of physical activity options that would be more appealing to them. Student designed games approach? Empowering these pupils with creating their own games? Giving them choices?

Determining forms of benchmarking that do not assess academic performance only but also areas like wellbeing (p.47): This is a very positive aspect that promotes an educational journey that is not solely preoccupied with the academic. This should be the way forward, but not too much weighting should be put on assessing, and surely not summative testing. Assessment for learning is crucial here.

Introduction of accredited alternative programmes in Secondary schools, with a particular focus on programmes that enhance wellbeing, active citizenship, and sustainability/green skills (p.50). Since these are alternative programmes, it is understood that they will replace other subjects/strands within the curriculum. What subjects/strands will be replaced for students opting to embark on alternative programmes? Which students will be offered such alternative programmes (early

school leavers); i.e. how will such students be identified considering the number of variables contributing to disengagement from the schooling system? What is the rationale behind the student choices? If we are aiming towards providing learning that is relevant over a person's lifetime, then all of these questions need to be critically reflected upon. Are such alternative programmes (since earmarked for Secondary school) intended as an "optional subject" which students can opt for rather than more traditional subjects?

Improved quality in pre-compulsory [0-3 years] settings (p.52): Unfortunately, physical education and physical activity are not mentioned here, considering the importance of these being tackled from a very young age. The earlier one starts, the higher the probability of students benefiting from outcomes related to wellbeing. Learning through play and in the outdoors needs to be stressed in pre-compulsory settings.

Recognition of elite athletes' effort in professional sport (p.53): Maybe the word "professional" needs to be amended here, considering that students are full-time students and under the age of 16. Additionally, the term 'elite athlete' needs to be defined. What about other students who are also engaging in sport, but not at an elite level? Should there be something similar (recognition) to non-elite level athletes? Are we after elite achievement or after growth and empowerment, and lifelong wellbeing?

2.4 Digital Literacy

In the case of educators, the goal underlying professional development and personal exploration should be:

- o Directed towards improving proficiency towards digital tools that pertain to hardware and software such as LMS, IVR and AR, and generative AI.;

- o Acquiring the right qualities to effectively and efficiently integrate these tools in practice therefore fostering positive attitudes towards technology.

In the case of students, they should be:

- o Subjected to processes that facilitate both teachers' and self-initiated initiatives to develop coding skills and competences;

- o Subsequently learn to design and manage digital systems for communication, learning, content creation, and social interaction;

- o Master the functionalities of these systems, hone their related skills, and cultivate positive attitudes to leverage technology for personal development and learning.

The education strategy should promote the use of digital tools in teaching, learning, assessment and personal development. It is about promoting different digital pedagogies or different modalities of learning and assessment. Thus, digital tools and resources are used to guide students to learn through:

- o **Instruction** – involving technology-enhanced teaching, online tutorials, online / distance education, using AI for acquisition learning;
- o **Exploration** – using digital tools like WebQuests, digital games and simulations, and AI to explore different aspects of curricular subjects;
- o **Designing / creating** – developing applications and software systems through
  coding, adopt digital storytelling as a pedagogical strategy for different curricular subjects, learn coding and design techno-digital systems through robotics, using generative AI to create new content.

Using tools that mediate different levels of collaboration – document sharing, technology-mediated discussion, and group-based tasks; using AI-enhanced collaborative spaces like Metaverse; participating in eTwinning projects. Promote eTwinning as an optimal educational context for developing 21st century competencies (including digital competencies) and for using digital technologies to enhance and transform the educational experience of students within different levels of the educational system.

Collaboration and sharing of ideas would also therefore enhance self-directed learning – using tools that promote reflection on the process of learning including blogs, ePortfolios, systems for learner and learning analysis, and AI-enhanced learning management systems.

The educational strategy should also promote the knowledge, skills and attitudes related to:
- o **Being online**, considering access to digital technologies and inclusion in digital environments, learning and creativity through digital systems, media and information literacy;
- o **Well-Being online**, considering ethics and empathy when using digital systems, health and wellbeing when using digital technologies, ePresence and technology-mediated communications;
- o **Rights online**, considering active participation, rights and responsibilities, privacy and security, consumer awareness.

Thus, in the context of the above points while reference to Educational Technology in this strategy may look limited and peripheral, we therefore assume that it will be augmented further with the mentioned Digital Education Strategy (2024-2030) that still has to be made available.

However, it is reassuring to observe how the implemented focus is directed towards supporting teachers through further professional development with indications of how the Faculty of Education can contribute to this strategy.

This will invariably be complemented with the provision of further support and guidance directed towards the recognition and need to implement digital literacy across the curriculum.The strategy is therefore making sure that both teachers and students have the required skills and competencies for this strategy to succeed.

Saying it differently, the National Education Strategy document is also an overarching document that mentions five other parallel documents including the Digital Education Strategy (2024-2030). Thus, as per strategy, education is being contextualised within a transformative journey that would empower people for the challenges and the opportunities of the future.

The fact that the influence of digital technologies is emphasised and taken as a prerogative for unprecedented societal changes is in itself proof of the importance and recognition the place of digital technologies

within the educational system are intended to be given. Thus, in this case rather than being just another document, the strategy is directed to foster a culture of continuous improvement and innovation.

The document gives importance to the adaptability and enhancement of data, digital and media literacy as part of the newly added 21st century skills and as part of the required qualities for a future ready nation. Specifically, there is the mention of a Digitalisation Action Plan. It is directed to introduce technological assistance in repetitive time-consuming tasks for teachers. It is subsequently seen as reducing the burden of repetition, giving teachers more liberty and time to enhance higher order activities by availing themselves of the acquisition of digital competencies that support pedagogy and professional practice making the profession itself more relevant and attractive.

Ultimately the focus of the inclusion of digital technologies is resting on the implications of boosting awareness of the digitally mediated transformation and how this may be embraced by all actors including students, educators and educational leaders through the acquisition of digital citizenship skills. The focus on supporting teachers and professional development, which are crucial elements in ensuring a successful implementation of all that the strategy is recommended. It also ensures a good approach that ensures that both teachers and students have the required skills and competencies for this strategy to succeed.

Rather than zooming in on the prerequisites of digital technologies alone, the way digital implications are being set within the curriculum are directed towards enhancing the qualities of digital citizenship through equity and inclusion, raising awareness of the ethical and good practice of digital technology such as AI and the strategic integration of educational technologies to prepare students for a green and digital transition as part of future challenges. Therefore, while the strategy may look like touching digitally mediated qualities peripherally, it is understood as being directed to procure a coherent and unified plan towards the setting of an innovative forward-looking society. It is therefore assumed that the Education Strategy, in conjunction to the more digitally inclined Digital Education Strategy (2024-2030), is directed to prepare all those within the educational system to recognise, identify, acknowledge and embrace innovative contemporary educational trends, underlining the importance of the ethical understandings in a technologically advanced society, also as per recent AI ethics regulations in the EU.

2.5 Education for Sustainable Development

The document highlights several positive suggestions to improve Malta's education system, including the importance of preparing learners for sustainability challenges. However, it raises concerns about the removal of Education for Sustainable Development (ESD) from a cross-curricular theme and its potential impact on the country's standing in international forums. ESD should be reinstated as a cross-curricular theme, accompanied

by a commitment to addressing the deficiencies in its implementation that may have given the wrong impression that a cross-curricular approach to ESD is doable.

Research leaves no doubt about the importance of ESD in addressing emerging challenges outlined in the European Green Deal and when dealing with Climate/Eco-Anxiety. Integrating sustainability principles into educational practices is crucial for building a generation equipped to work towards a more sustainable and equitable future. Officially,

SD is not adequately addressed in the current curriculum, as its Learning Outcomes are too generic, and efforts to address the Early Years and specific subject areas (with the exception of a handful) has not been forthcoming. On the other hand, the EkoSkola programme – thanks to the teachers assigned to it by the Ministry – has successfully implemented ESD in the majority of schools albeit at an extracurricular level, proving that more could be achieved with the right official support.

Furthermore, if "*wellbeing, active citizenship and sustainability / green skills*" (p.50) are considered of crucial importance, why aren't they mainstreamed in the curriculum instead of being featured in "*alternative and supplementary learning pathways*" (p.50)?

There are concerns about the document's direction to integrate ESD into Global Citizenship Education (GCE) that is being viewed "*as a major overarching principle within this strategy*" (p.39). Based on international research and recommendations from international bodies like the OECD, UNECE and UNESCO this approach is a step in the wrong direction. While GCE provides a framework for understanding the world, ESD offers a more focused approach by integrating sustainable

development principles into educational practices – an indispensable approach (seen as an entitlement by other national educational authorities) if we want to adequately prepare learners (of all ages) for the Green Transition.

In conclusion, it is important that ESD retains its role as a cross-curricular theme and is given the right support to ensure its more robust and effective implementation in Malta's education system.

2.6 Languages

Unfortunately, minimal attention is being given to foreign languages. Apart from the proposed re-design of the Foreign Language Awareness in the Primary (FLAP) provision, there is a glaring absence of comprehensive proposals for foreign language education in Secondary, Post-Secondary, and Tertiary sectors. Numerous European documents stress the importance of foreign language education for mobility, employment, and cultural understanding. However, Malta has witnessed a decline in foreign language learners, especially at post-Secondary levels, as evidenced by diminishing enrolment figures.

The feedback underscores the urgent need for a strategic commitment to revamp foreign language education. The current curriculum, focusing on grammatical accuracy and literature, does not align with the communicative competences demanded by today's job market. The lack of attention to this issue in the National Education Strategy raises concerns about the prioritisation of language proficiency in a globalised world. Failure to

address the recommendations made, may lead to the extinction of foreign languages in Malta, negatively impacting various sectors.

We emphasise the vital role of language competence in a globalised world and urge the integration of these suggestions into the National Education Strategy for a more comprehensive and effective framework.

Foreign languages are barely mentioned. In fact, with exception of the proposed "re-design of the Foreign Language Awareness in the Primary (FLAP) provision" (included in Strategic Goal 3, Growth & Empowerment), there is no further mention of foreign languages. While

we appreciate that this goal is important and necessary and concur that students are to be "exposed to and given basic communicative skills in a foreign language from an early age", we would have expected the Strategy to build on this and formulate clear proposals for the teaching and learning of foreign languages in the Secondary, Post-Secondary and Tertiary sectors.

Foreign languages are disregarded although, as it is well known, Malta's economy is dependent on human resources and foreign trade with the two most important employability sectors being tourism and digital gaming, for which foreign language skills are an integral and indispensable component in the provision of a high standard of service. In the tourism industry, there exists a strong link between excellence in tourism services and excellence in language skills while several research studies show that a variety of languages are required on international markets and that the most quoted barrier to intra-European mobility remains lack of foreign language skills.

In the world of work, language skills are becoming increasingly important in organisations and businesses that want to remain competitive on an international level. The Report from the thematic working group "Languages for Jobs" European Strategic Framework for Education and Training (ET 2020)[2] highlights the rising demand for foreign languages and communication skills on the European labour market and underlines the need for the development and dissemination of new methods of teaching languages which are more learner-focused, practically oriented and more applied to professional contexts in order to reduce the gap between supply and demand of language skills and to increase the motivation of learners.

In this respect, reference is being made to one of the sub-objectives of the Lisbon Strategy which states that there is a need to improve foreign language teaching at all levels of education throughout Europe, as they are key to the multilingual nature of member states of the European Union. Such a need is highlighted in various EU and Council of Europe

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[2] European Commission (n.d.). Languages for Jobs. Providing multilingual communication skills for the
labour market. Report from the thematic working group "Languages for Jobs" European Strategic
Framework for Education and Training (ET 2020). Available at
http://ec.europa.eu/assets/eac/languages/policy/strategic-
framework/documents/languages-forjobs-report_en.pdf. [Accessed 15th January 2024].

documents. For example, in its resolution of 11 November 2021 entitled 'The European Education Area: a shared holistic approach', the European Parliament underlined the importance of learning foreign languages. It underscored the need for Member States to take action to support the development of linguistic competency at all levels, especially in

Primary and Secondary education, to embrace the Council of Europe's goal of 'plurilingualism' and to achieve the benchmark of all pupils having a sufficient knowledge of at least two other official languages of the EU at the end of their lower Secondary education at the latest.

Furthermore, in the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on Achieving the European Education Area by 2025, entitled *Fostering language learning and multilingualism,* it is stated that: "Being able to speak different languages is a condition for studying and working abroad, and fully discover Europe's cultural diversity. It enables learners and teachers to benefit from a genuine European learning space. Valuing and mobilising learners' linguistic backgrounds"[3]. Yves, Renard and Milt (2023) also insist that foreign language competence is regarded as one of the basic skills that all EU citizens need to acquire in order to improve their educational and employment opportunities[4].

This sense of urgency becomes even more pronounced in view of the European Commission Council's Explanatory Memorandum statement (2018)[5],

> Language competences are at the heart of the vision of a European Education Area. With increasing mobility for education, training and work inside the Union, increasing migration from third countries into the Union, and the overall global cooperation, education and training systems need to reconsider the challenges in teaching and learning of languages

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[3] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0625 [Accessed 15th January 2024].

[4] Olivier Yves, Alain Renard and Kristiina Milt (2023). *Fact Sheets on the European Union.* https://www.europarl.europa.eu/factsheets/en/sheet/142/language-policy [Accessed 15th January 2024].

[5] European Commission (2018). Proposal for a council recommendation on a comprehensive approach
to the teaching and learning of languages. Available at
https://eur-lex.europa.eu/legal-content/EN/TXT/?uri [Accessed 15th January 2024].

and the opportunities provided by Europe's linguistic diversity (p.11).

These are just a few of the numerous documents underlining the importance of foreign language teaching and learning, seen to be a key means of giving expression to the multilingual nature of the European Union. Notwithstanding this, Malta has witnessed an overall decline in the number of learners of foreign languages, especially at post-Secondary level, as shown in Tables 1 & 2;

Table 1. Students studying a foreign language at 'A' level in Malta and Gozo.

Students studying a foreign language at "A" level (1st Year) in Malta & Gozo	
Scholastic Year 2016-17	189
Scholastic Year 2017-18	163
Scholastic Year 2018-19	129
Scholastic Year 2019-20	145
Scholastic Year 2020-21	113
Scholastic Year 2021-22	101
Scholastic Year 2022-23	80

Table 2. Students studying a foreign language at 'Intermediate' level in Malta and Gozo.

Students studying a foreign language at "Intermediate" level (1st Year) in Malta & Gozo	
Scholastic Year 2017-18	324
Scholastic Year 2018-19	259
Scholastic Year 2019-20	284
Scholastic Year 2020-21	135
Scholastic Year 2021-22	230
Scholastic Year 2022-23	218

Besides the dwindling numbers documented above, there are concerns about the generally low proficiency level in foreign languages among youths at the end of compulsory education. Many of them, irrespectively of whether they sit for their SEC exam or not, find it hard to express themselves in a foreign language. These concerns have been raised from all leading sectors, among which employers, the teaching professionals and politicians.

At Tertiary level the situation is not any better. Suffice to say that within the 3 most important institutions in Malta that offer Tertiary education, the number of students studying foreign languages is very low. At the University of Malta (UM), only two Faculties are involved in the teaching of foreign languages, namely the Faculty of Education and the Faculty of Arts. Unlike many other universities around Europe, there exists no Foreign Language Centre or Institute at the UM. At the Malta College for Arts, Science and Technology (MCAST), foreign language teaching has only been introduced on a voluntary basis as from academic year 2017-18 with the introduction of the SPA programme in Italian, French and German, whereas at the Institute for Tourism Studies (ITS), foreign language proficiency courses are still not compulsory for all students.

At present, the only option for students who would like to further their studies at post-Secondary in any particular foreign language is to either choose an "A" level or an "Intermediate" course as part of the MATSEC certificate. These courses, by their very own nature, are specialised with content based on developing grammatical accuracy and a strong focus on literature and culture. This, however, may not be attractive to many learners who wish to develop communicative competences, and to learn foreign languages to travel, make contacts abroad, develop their interest in the arts, food, music, sports etc. Most young learners today would like to improve their proficiency in the basic foreign language skills, namely listening, speaking, reading and writing, also in view of future job prospects and/or requirements. This is not being addressed adequately through the current language proficiency courses offered at post-Secondary level.

As far as foreign language teaching and learning is concerned, there is an urgent need for a planned, sustained commitment to a programme of change. If not, we are risking the extinction of foreign languages locally

and a consequent impoverishment of linguistic abilities which are beneficial to various sectors, including business and education.

The fact that the alarming situation we describe in our feedback has been almost completely omitted in the National Education Strategy, leads us to believe that modern language graduates and/or employees are not considered important by MEYR in today's globalised world and that our country does not need graduates and employees who are proficient in one or more foreign languages. This is alarming given that apart from the huge benefits of foreign language learning, like the acquisition of vital cognitive skills and intercultural awareness, graduates and employees with high levels of language competence find it much easier to engage effectively with the rest of the world, giving them a cutting edge over their colleagues and/or competitors when it comes to research collaborations, trade, diplomacy, etc.

We therefore recommend that the following suggestions are taken into consideration and included in the National Education Strategy:

a) include a section, in Pillar 2 'Growth & Empowerment', specifically dedicated to foreign languages, with clear provisions as to how they will be included, sustained and nurtured from the Primary sector (e.g. FLAP), in the Secondary sector (e.g. by focusing on communicative competences and language awareness) and in the post-Secondary & Tertiary sectors (e.g. by offering opportunities for students to continue learning the languages they were exposed to at Primary & Secondary school and to learn new ones);

b) introduce, possibly within the After-Schools Programmes that are being envisioned, foreign language enrichment programmes that provide school-aged children with opportunities to engage in enjoyable activities, games and projects that foster natural language acquisition;

c) introduce elective foreign language proficiency courses for general purposes at post-Secondary level. Increase the appeal of such courses by associating accreditation measures that facilitate progression to advanced studies;

d) establish Foreign Language Institutes or Centres that provide compulsory foreign language proficiency courses for specific purposes within Tertiary level institutions (MCAST, ITS, UM);

e) incorporate technology-enhanced language learning tools to make language learning more engaging and accessible. This could include language learning apps, virtual reality environments, and online exchange programmes with native speakers;

f) create an inclusive classroom environment that values and leverages foreign students' linguistic and cultural diversity. Encourage students to share their languages and cultures with peers;

g) engage local communities and language speakers in creating real-world learning opportunities for students, such as language clubs, conversation circles, and cultural festivals;

h) advocate for the importance of foreign language education in developing global citizens, critical thinking, and intercultural competence.

The National Strategy for Education mentions very briefly the importance of the Maltese language. The Maltese language is CENTRAL, not only to Maltese identity, but more importantly to the cognitive development of Maltese learners, and to the social inclusion of non-Maltese speaking learners. Therefore, following this strategy, it is of utmost importance that a document is drawn up to establish HOW exactly the Maltese language is to feature in the Maltese education system. Everyone needs to understand how detrimental it is that we are fast moving from a bi-/pluri-lingual, toward a monolingual schooling system.

2.7 Humanities

The document emphasises acquiring essential skills, socio-emotional competencies, and civic duties in compulsory schooling, with a central focus on wellbeing from both ends, that is, the provider and receiver. The strategy addresses the impact of migration and cultural diversity by bringing them to the forefront via intercultural understanding and

competence. Consequently, we aim to facilitate students attainment of 21st-century educational rationale based on problem identification and solving, including lifelong learning as a lifestyle.

The National Education Strategy 2024–2030, while highlighting essential skills and socio-emotional competencies, seems to be lacking a clear commitment to Michael Young's theory of powerful knowledge, that is, the specialised knowledge that is acquired from specialists as opposed to the everyday awareness (knowledge and skills comprised) noticed and acquired.

The strategy explicitly favours the sciences. It is more inclined towards skills as a vehicle for employability than a promotion of deep knowledge, with the latter being unchained from the rule of economics as dictated by the driving market. By way of example, reference is made to Section 05, Pillar 2, Measures 7 and 14, p. 52 and p. 56, respectively.

> *An increased investment in the scholarship scheme in focal areas, particularly science, technology, engineering, and mathematics (STEM), and green skills.*
>
> *Establishment of the Strategic Foresight Unit, which will set up two main forums: one with industry and social partners and one with private sector providers.*

The document, as presented, has the potential for amelioration by balancing the act between the different disciplines and the expected outcome, together with more specifics and detail. It should not be a competition, a tug of war between sciences, arts, and vocational; on the contrary, it should be a unified curriculum where everything has its place and value as part of an ever-changing society.

2.8 Financial and Economic Literacies

International and European research and policy documents stress the importance of financial literacy as it cultivates financial attitudes, skills and behaviours and provides students with the necessary baggage to enhance personal financial wellbeing. Moreover, financial literacy is key to enable individuals to become critical of financial decisions on different levels and empower them as individuals to take stock of problematic financial situations (at personal, organisational, national and international levels), besides seeking ways for improving the current state of affairs.

Likewise, economic literacy is an important building block contributing towards holistic education, given that it provides the necessary tools to understand how the world functions with respect to the production,

allocation and distribution of scarce resources. The latter form of literacy is crucial to develop active citizenship which starts off from understanding, analysing and ultimately seeking to improve the material conditions that impact the lives of individuals, groups of people and organisation structures.

It is pertinent to note that while featuring regularly as main themes within the latest Maltese national curricula, financial and economic literacies are not being provided with the necessary curricular space to flourish among students. Research evidence suggests that financial and economic literacies have so far been sidelined in the local scene. We note with disappointment that once again they are being overlooked in this future-oriented document.

Page 50 calls for the '*introduction of accredited alternative programmes in Secondary Schools, with a particular focus on programmes that enhance wellbeing, active citizenship and sustainability / green skills*', whilst page 51 refers to the '*introduction of supplementary accredited programmes in the Middle and Secondary schools that focus on current themes, including active citizenship, sustainability and global citizenship*'. These references call for the introduction of a compulsory financial and economic literacy component in the core curriculum, given that active citizenship requires a sound financial and economic grounding. Moreover, global citizenship requires an understanding of local and global economies, international trade, and the impact of economic policies, amongst others. Sustainability is also part and parcel of basic modern concepts inherent in economic and financial literacies. The third *strategic objective – Growth and Empowerment* would be a very fitting place to highlight the need for economic and financial literacies. This would also address the '*need to improve the synergy between the education sector and the industry*' (page 52) because of the direct link between financial and economic literacies and the workplace.

In this day and age, whilst Malta is experiencing rapid economic growth, there is little doubt that the economic literacy of the young generation needs to be enhanced. Currently students in Church and Independent schools have the opportunity to understand the economic world around them by opting to take up Economics in year 8. Counterparts attending State Secondary schools are currently not provided with this subject option and this has been so for the past thirty years.

Page 46 of this document mentions the need for *the revision of the current option exercise model with a particular focus on the biological age that learners*

make their decisions and the range of options on offer. It is in this spirit of reviewing current optional subjects that we recommend the need to introduce Economics in State schools. Students would then have the opportunity to equip themselves with the agency to critically participate in the economic world around them. This is particularly crucial to elucidate students on important economic issues which would inform them to vote meaningfully and participate actively in the democratic processes afforded at local, national and European levels.

2.9 Mathematics

It is surprising that no reference is made to the *National Strategy for Mathematics Education*, a work-in-progress that was initiated by MEYR in late 2017. The strategy focuses on mathematics from day care centres to post-secondary level. The project involved the input of university academics, officials from within MEYR and educators from the State, Church and Independent sectors. It also involved focus groups discussions with education leaders, teachers, parents and students from the Early Years to post-secondary level. From the outset, this *Strategy* focused on teaching, learning and assessment, attitudes, resources, achievement, CPD and research. Is this almost finalised work to be side-lined and replaced by a completely new *Mathematics Literacy Strategy*? Or will the *Mathematics Literacy Strategy* be based on the text of the *National Strategy for Mathematics Education*, with due acknowledgement given to the lengthy and detailed process of the latter?

Moreover, the *National Education Strategy 2024-2030* proposes the setting up of "A comprehensive *Mathematical Literacy Strategy* that identifies, studies and addresses the challenges, from pre-compulsory to tertiary levels, in relation to Mathematics, including the labour gap in technical fields and the gender gap" (P. 47). This, in itself, is a most positive development as it provides key stakeholders with an interest in mathematics education, with an opportunity to engage critically with the current situation, with formulating an updated vision for mathematics education, and most importantly with coming up with concrete doable steps of how to implement the agreed vision. I'm confident that the Faculty of Education looks forward to giving its contribution to the successful outcome of this process.

We are slightly concerned, however, that the dominant discourse in the document is linked to presenting Mathematics as a 'problematic' subject. Consider, for instance, the reference on page 26 to the need for decreasing the percentage of students who are considered low achievers in Mathematics, and the reference on page 27 that students reach minimum proficiency level in Mathematics. Both aims are laudable, and it is very positive that the strategy document is highlighting these two as areas of concern.

But we would argue that strategically it would make more sense to work towards a strategy, and make this explicit in the document, that truly aims to position student learning at the centre of all our educational endeavours. This would send the message, which we found missing in the document, that Malta is seeking excellence in mathematics education, obviously according to the different abilities and needs of all students. This would have in turn important repercussions on the *National Assessment Strategy* that is also part of the document. For it is well-known that unless the assessment culture changes, it would be very hard for teachers and schools to implement changes at classroom level. Now aren't meaningful 'for learning' changes in mathematics classroom practices what we ultimately all want? Consequently, I would argue that one cannot see tangible improvements for all our students unless mathematics education and assessment are considered in symbiosis.

The matter of mathematics content remains crucial, but it would be counterproductive to continue piling practically the same content on all our students throughout the compulsory years (the imminent discontinuation of SEAC Mathematics does not bode well within this context). And it needs to be examined the kind of content we do, for whom, and with which purposes. But the greatest lacuna, at least in my opinion, that the *Mathematical Literacy Strategy* would need to address is the lack of real space for students to develop their mathematical processes. We all know that when met with time restrictions, teachers will choose to focus on content rather than processes, as this choice is seen to improve their students' chances of examination success.

This brings us back to assessment: change assessment in a credible manner (the operational logistics of the recent introduction of SBA might need to be reconsidered) and learning in likely to flourish. It is this direction that we urge the *National Education Strategy 2024-2030* to take up.

● ● ●

3.0 Conclusion

This feedback document is a compilation of many different opinions coming from members of the Faculty of Education. This range and diversity of opinion gave us the opportunity to be relatively exhaustive in the way we are communicating our views, stemming from a wide spectrum of expertise and varied experiences. However, it also runs the risk of presenting a document with different writing styles. We have made our utmost, in the time available, to communicate our vision in a coherent manner.

Overall, we feel that the fragmented approach to policy making persists, as local policies keep emerging independently of each other. For example, the fact that we have a National Lifelong Learning Strategy published before a National Education Strategy is indicative of the asynchrony of the local policy scenario, where sectors work largely in silos rather than emerging from one national coherent vision with clear signposts for eventual sectorial action.

To avoid fragmentation, it is being recommended that the National Education Strategy be replaced in vision and function by an authentic National Lifelong Learning Strategy; a policy which genuinely captures and synthesises a national dialogue on: what are the challenges of the world and society; what constitutes an educated person in the second decade of the twentieth century; what constitutes quality education in the context of an agreed concept of the educated person; what are the evidence-informed issues in education; what should be the basic-provision entitlement of all students that would guarantee equitable access to quality lifelong and life-wide education, irrespective of personal, social, economic and cultural circumstances; and how can monitoring, quality assurance and accountability be achieved in the best interest of all.

The balance is difficult to maintain within the scope of this Strategy. The concern for a revised and improved higher and further education system relevant to today's global and industry needs is manifest in the few references linkable to tertiary education. Thus, the Post-Secondary Review Working Group is to revise and improve the current post-secondary system so that it "truly reflects current challenges and needs",

namely promoting "work-based learning and enhanced industry partnership". Scholarships target focal areas, specifically STEM where students can pursue areas with "unprecedented industry demand". This is all part of an increased synergy between the education sector and the industry including partnership with the National Skills Council for Professional Development sessions with Vocational Education and Training (VET) educators; following the Comprehensive National Basic Skills Guidelines disseminated across all sectors of our education system; a more concerted effort, with the collaboration of MCAST, ITS and the UoM, to promote entrepreneurship across all levels of the education system; and, engagement of the industry in shaping the vocational programmes accredited by the Directorate for Quality and Standards in Education. This reflects Bob Jessop's idea of a neoliberal, "structural coupling and coevolution of the increasingly dense ties between the academy and capitalism" (Varieties of academic capitalism and entrepreneurial universities, 2017, p. 854).

The actual draft document of this strategy does not give sufficient confidence and peace of mind that the targets set in the document are research informed. While it is applaudable that the steering committee has walked the extra mile to consult with as many stakeholders as possible, the measures and initiatives are evidently lacking the value added of empirical research and comprehensive auditing of the multiple initiatives were taken in response to targets set by the outgoing strategy. While anecdotal and intuitive knowledge ought to be recognised as valid ways of seeing, they are generally considered as too interested to provide a robust and reliable basis for action. It is, therefore, our strong view that evidence-based policy formulation is no longer an option.

We recommend that the final draft of this policy document includes a column indicating which evidence is the respective measures and initiatives responding to.

It is also not clear why the document proposes to revise the quality standards and external review mechanism, given that these standards have been published a few months ago. Moreover, what are the authors' intention when they state that the country needs a more robust legislative framework. Likewise what kind of CPD do the authors have in mind? The document fails to mention and address a number of challenges, amongst which, cooperation with parents, the wellbeing of

Early Childhood Educators (ECE), the professionalisation of ECE, the possibility of ECE to be part of leadership teams, children's quality education (rather than child minding), the current education level of ECE, transition from ECEC to primary setting, multilingual, multi-religious and multicultural background of children and their families, the challenges that educators are facing.

While different stakeholders operating outside the education system have been consulted, the document does not acknowledge the limitations of education in addressing complex social, economic and cultural issues. In fact, the document rarely ventures outside the educational realm to incorporate a more comprehensive vision for equity and inclusion within society at large.

As outsiders to negotiations between MUT and government regarding the collective agreement, we would like to believe that the National Strategy is at the centre of the ongoing negotiations. In the past, many initiatives have been stalled because of industrial issues related to initiatives informed by the strategic plan. We eagerly wait for an announcement that the current draft strategy is at the centre of negotiations and that an agreement would guarantee implementation of all actions.