



Governance mechanisms, school principals and the challenge of personalized education in contexts

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Abstract Schools around the world are diverse and there are a variety of progressivist initiatives in place that aim to promote quality and equitable pedagogy and overcome formalist paradigms. Country contexts present different challenges based on factors such as the type of governance, teachers' autonomy, and pedagogical cultures. Most critical, however, is the unequal distribution of leadership opportunities. Beyond conflicting or contrived possibilities in school leadership arrangements and cultures, it should be recognized that certain contexts lack effective leadership as an organizational quality. Nevertheless, school principals are able to create coherent environments, offering space for debate and clarification of what equity and equality mean in terms of curriculum delivery, as well as supporting school-level structural facilitations and adaptations. This is a conceptual paper, at the crossroads of different research strands. It focuses on governance mechanisms and leadership tasks and skills in pedagogical and organizational school cultures. It argues that well-articulated school organization is needed, not only in terms of autonomy, but also with the possibility to collaborate, develop professionally, and engage locally in order to achieve equitable student-oriented teaching. The aim is to investigate the feasibility of supporting personalized and adaptive teaching strategies at the school level, in a variety of country contexts.

Keywords School leadership · Personalized education · Adaptive teaching strategies · Governance mechanisms

Teaching quality is closely linked to equitable approaches (Mincu, 2015b) that are able to meet and support students' needs. While a variety of strategies can be effective—in the right order to match pupils' stage of learning (Rowe, 2006)—progressivist initiatives,

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identified as personalized (differentiated) instruction or adaptive teaching, play a key role; however, their distribution across cultural contexts is uneven. In other words, these components of well-established constructivist pedagogies may be seen as universal solutions that can be used in specific contexts. At the same time, there is a need to explore how these theories can be adapted to fit with local pedagogical cultures, while preserving their equitable potential. Such adaptation processes require expert knowledge and collaboration, as well as concerted efforts at the school-, district-, or even country-level, rather than piecemeal individual class-teacher initiatives. Some of the challenges posed to school principals are system governance structures in which leadership can be characterized overall as quite weak (Mincu & Granata, 2021; Paletta et al., 2020) in flat collectivistic cultures (Kaparou & Bush, 2015), or too intense, associated with high accountability pressures (Day & Sammons, 2014). As a concept, system governance goes beyond the internal workings of a school; it is shaped by the power dynamics of central ministerial arrangements. This can include various interactive forms of governance, such as hierarchies, markets, and networks. As a consequence, schools with high autonomy systems develop specific professionalism forms, i.e., teachers or occupational types (Sachs, 2001, 2016), while low school autonomy systems are regulated more by public administration routines and country-specific forms of teachers' professionalism. In the latter case, principals' capacity to act with leadership is amply determined by system-wide governance structures, specified in national level regulations. This affects, in particular, teachers' contracts and the methods by which decisions are made at school level. In the same vein, Gurr and Drysdale (2013) sharply highlight the relevance of system governance and school arrangements across different contexts, 'If we are to be serious about improving schools there is a need for school leadership structures to be reconsidered and then appropriate support given to ensure we have leaders capable of transforming schools' (p. 62).

To enable quality and equity-compatible pedagogy to be established, coherently in every class, research evidence suggests that principals are key (Leithwood et al., 2008; Sammons, 2010), even in contexts in which school structures are flat and instructional leadership is emergent or occurs on an ad hoc basis. In this paper, instructional and transformational leadership are both considered when referring to principalship. In fact, first-order (instructional) changes directly affect the quality of the curriculum and teaching and are also mediated by second-order (transformational) changes, able to increase the wider organizational capacities (Paletta et al., 2020).

I will argue that principals are in a position to ensure coherent environments, to offer space for debate and clarification of what equity and equality means in curriculum delivery, as well as to support school-level structural facilitations and adaptations. This paper draws on a variety of research strands: (1) leadership theories, (2) teacher quality and constructivist approaches from a school-effectiveness perspective, (3) policies of personalization, and (4) equitable and inclusive educational strategies.

Rationale 1: 'What is worth comparing about leadership?'

Comparative education has a longstanding interest in teachers, teacher identity, education, and work in different contexts (Burn & Menter, 2021; Tatto, 2011), while it has amply neglected the roles of principals in country contexts (Flessa et al., 2021). On the one hand, distinguishing between teachers and principals/leaders, especially middle managers and more informal leaders, is not always straightforward. In fact, teachers themselves can act

with agency and leadership, formally or informally, and principals may draw upon their experience as teachers. On the other hand, underlying the reluctance to engage with leadership is the assumption that it refers primarily to ‘managerialism’ and neoliberalism, and not to organized agency (Mincu, 2022). In their fascinating review, Flessa and colleagues (2021) raised the question regarding comparison and leadership—as in the title of this rationale—and provided a series of key research topics for comparative scholars interested in understanding how school organizations are steered, for instance in centralized and decentralized countries, and how leadership ‘emerges’ differently in such contexts. In fact, the existence of flat or prominent hierarchies impacting on teachers’ agency and their cognitive schemes for action (Hall & Taylor, 1996) is crucial for any change or school improvement. In addition, how leaders respond to larger national and global policy contexts and negotiate local meanings (Anderson-Levitt, 2003) is a key question for any comparative endeavour to understand change and system transformation.

Rationale 2: Why equitable pedagogies are student-centred (while staying vigilant of perverse effects)

Massive efforts are deployed in some contexts to better meet the learning needs of diverse student populations (UNESCO IBE, 2021), in both emerging and consolidated economies, in response to Sustainable Development Goal (SDG) 4. In many places around the world, teaching is inadequate both in terms of effective learning and student well-being, because certain forms of instruction can be highly demoralizing and disengaging for students (UNICEF Innocenti, 2020). The engagement of both students and teachers may be undervalued or limited. For these reasons, there is an urgent need in the education field to recognize the wide relevance of effective and genuine approaches to personalized and adaptive teaching (Paterson et al., 2018) and to facilitate them at the organizational level by effective school leadership initiatives.

On the one hand, meeting individual student needs with adequate challenges and instructional approaches, as well as ensuring their voice (Fielding, 2004) and participation, is a commonly felt need across the globe (Schweisfurth, 2013, 2019). On the other, making a difference for each student is often locally hindered by ineffective organizational patterns, as well as larger societal cultural features, such as the strength of a society’s social hierarchy (power distance), that affect the agency of school actors in highly centralized and hierarchical systems (Day & Sammons, 2014). The number of available resources is the major difference between high-, low-, and middle-income countries. At the same time, and despite such differences, the strategies to improve schools are essentially the same (Andersen & Mundy, 2014), and personalized learning comes centre-stage in leadership practices (Day et al., 2016; Gurr and Drysdale, 2013) or as a toll to radically transform school systems (Fullan, 2012). There is, in fact, a significant consensus about the necessity of tailored approaches, even in more formalist pedagogical cultures that are curriculum- and teaching-oriented, very often in post-colonial centralized school systems. These systems encounter huge difficulties in promoting authentic school-level innovations, for instance in francophone African countries, and even Confucian-oriented school cultures, where whole-class teaching approaches are the norm (e.g., China and Japan).

Certain forms of differentiation and personalization are accused of contextual distortions and perverse effects (Mills et al., 2017). One reason can be the larger political paradigm in neoliberal countries with intense accountability systems that reduce the

humanistic potential of personalization (Fielding, 2012). Another is curriculum differentiation and ability grouping, whose overall effect is perverse and fuels inequalities. While ability grouping as a key strategy may be an inadequate tool under certain conditions, flexible groupings of all sorts and the use of pairs are considered effective strategies (Tomlinson, 2005).

There is, however, mounting evidence that addressing students' individual learning needs, by helping teachers to personalize instruction, providing additional help to struggling students, or letting students learn at their own pace, increases student achievement. Perhaps equally important, these strategies are often most effective in enhancing the skills of low-achieving students (Ganimian & Murnane, 2016) and do so without harming their high-ability peers.

Rationale 3: Integrating organizations, contexts, and pedagogies

It is necessary to jointly consider integration between organizational contexts and the potential to shape instructional practices at the school level (Sun & Leithwood, 2012). The major paradigms (and policies) of student-centred education and curriculum or a textbook-based instructional model are often set against each other, yet they need not function in complete discontinuity or contradiction. Therefore, this article does not focus on the 'technical' aspect of showing how school leaders can impact teachers' leadership in their classes (e.g., York-Barr & Duke, 2004), but rather takes a broader perspective to explore how system governance and leadership roles are able to support a major paradigm shift within specific settings, as they currently stand. While it is true that some capacity-building can take place in any context—including those in which principalship is weak or oriented to administrative tasks—adequately understanding flat *versus* hierarchical arrangements, as well as cultural patterns of school organizations and larger governance combinations, is necessary to bring about change.

RQ1 What system governance arrangements enhance school principals to support personalization?

RQ2 How can school principals encourage, at least in part, personalized instruction in diverse contexts?

Case studies are discussed briefly to derive theoretical points about contexts in which school leadership is too weak or too strong. The paper draws on extensive work on these topics over many years in different countries.

Theoretical framework

Personalization encompasses specific forms of student-centred teaching and learning and characterizes learning environments. At the same time, its versions are a matter of paradigms (humanist *versus* functionalist, Mincu, 2012) as well as education policies and pedagogical traditions around the world.

How personalized approaches vary as forms and types in country contexts

A recent pedagogical initiative in the field of educational development, *Teaching at the Right Level* (TaRL), developed by the Indian NGO Pratham, won the prestigious Yidan prize for Education Development in 2021. Major tools of the initiative to reach each student's 'right level' include grouping by learning needs instead of age, regular formative assessments, and a focus on foundational skills, with possible variations in the recommended strategies, particularly the ability grouping, which may not be effective in some parts of the world. Because of the promise to meet the individual needs of the most disadvantaged pupils in some of the poorest areas of the world, the approach is endorsed by development agencies, including UNICEF. This provides a vivid illustration of the relevance of context-compatible personalized and student-centred pedagogies. While the uncritical adoption of solutions from elsewhere should be avoided, the recognition of learners' needs and voices is a pedagogical imperative that requires targeted and equitable approaches.

TaRL is just one version of personalization that is rooted in progressive and constructivist theories, focusing on the centrality of the learner and the importance of learning as a process. A personalization-differentiation strategy addresses individual needs from a student-centred perspective. It diverges from mere individualization, reminiscent of the 'one-room schoolhouse' (Tomlinson, 2003) or multigrade teaching (Little, 2006). In fact, teachers can decide when they deem it suitable to work at the level of the whole class, with groups, or with individual students. In the Anglo-Saxon countries (Seashore-Louis, 2015) where progressivism as a major pedagogical paradigm is well-rooted, the debate around effectively meeting student's needs is far more nuanced and the pedagogical and organizational tools are very sophisticated. In other regions around the world, approaches of personalized or differentiated learning for all children remain weakly rooted in daily school practices. Some scholars would argue that these are incompatible with local traditions of whole-class teaching (Guthrie et al., 2015) and are thus doomed to failure (Tabulawa, 2013), at least without more robust support. And yet, the central point is the same: how to support the personal development of every student and better recognize voice and agency in forms that may be culturally sensitive (Schweisfurth, 2019).

Over the years, very different theoretical approaches have emerged, accompanied by diverse policies implemented around the world (Mincu, 2012)—and by intense criticism when the underlying philosophy was perceived to be renewed neoliberalism (Hartley, 2009; Peters, 2012). For some scholars, personalization is a suitable technical mechanism to produce improvement, albeit regulated by a moral aim (e.g., Fullan, 2015). For others, it is a matter of care and social justice, from a radical humanistic perspective (Fielding, 2012; Mills et al., 2017). Other lenses highlight the role of adaptation that may not always be a preplanned approach, but rather something that happens spontaneously within the teacher–student interaction (Dumont, 2018; Parsons et al., 2018).

Nevertheless, the situation around the world can vary extensively. In some countries, there are formal policy indications in place to differentiate (e.g., France), others have implemented and further transformed various strategies over time (e.g., England), while elsewhere (e.g., Italy) both the policy attempts and the school practice are rather at odds with student-centred approaches. Some of the key elements to support this key equitable strategy are professional development, adequate resourcing, and a type of working contract that allows for extra tasks beyond class teaching. As a matter of fact, low school-autonomy

countries are rather textbook-teaching-oriented, with inconsistent professional development opportunities and few other pedagogical tasks beyond teaching. Therefore, whole-class approaches through equal input and expected equal outcomes are the norm.

Equity and equality through curriculum

Equity is often understood in terms of equality (Cochran-Smith et al., 2016), which means providing the same access to teachers, curriculum, and resources, including a certain egalitarianism in teaching (Taylor et al., 2011). This understanding is predominant in many countries around the world, particularly in formalist (Guthrie et al., 2015) and content-transmissive pedagogical cultures. This cultural understanding is a limiting aspect that maintains and widens the gap between students' diverse levels of ability. Nevertheless, a general discourse about equality of opportunity *versus* equality of outcome is a complex one and there are contextually relevant forms and ways in which equality must be considered, for example in terms of exposure to an equally challenging curriculum and equal nurturing of high aspirations (Mills et al., 2017).

If the premise is an equally challenging curriculum, to what extent should different students receive the same curriculum? This is a fundamental question to which the answer is nuanced. Content that is neither relevant nor intelligible for certain students cannot be equity-compatible and therefore a curriculum sameness premise is, in this case, highly dysfunctional and inequitable. While there is a request for equitable exposure to a common curriculum, the personal relevance of the knowledge implies that there may be different ways into the same curriculum and, ultimately, personal progress is achieved through powerful knowledge related to each learner. As Young and Muller (2013) have argued, mind-openness and the possibility to envision imaginary worlds emerge from powerful knowledge that is both socially and personally relevant. In the same vein, the possibility to be visionary pertains very much to everyday thinking and to the sense of oneself (Bruner, 1986) that certain forms of knowledge are able to support.

A curriculum sameness premise strongly questions uniform practices of teaching, so much in use around the world and in contexts that may be very different. Equality of aims through uniform strategies can be reached at the price of leaving someone behind, ignoring or blaming less able students, or by holding back more accelerated learners. The same measure and level cannot respond to specific groups of pupils and to individual needs. Therefore, teachers who are aware of the diversity of their learners encourage more differentiated or personalized approaches that are planned in advance. There are also calls for adaptations on the spot, during the actual interaction when learning occurs (Dumont, 2018).

How does system governance support school leadership?

School systems vary considerably around the world. Specific governance arrangements as well as deep cultural factors (Lee & Hallinger, 2012; Sun et al., 2007) drastically impact leadership tasks and responsibilities. For instance, a school context can be portrayed in terms of interactions of forms of governance, at the interplay of three major mechanisms: markets, hierarchies, and networks (Mincu & Davies, 2019). Related to this, system

cultures can be described in terms of fatalist, egalitarian, individualist, and hierarchical approaches (Hood, 1998; Malin et al., 2020).

Each context can illustrate a specific combination of mechanisms of governance. For instance, in England, all are well-represented, with market mechanisms prevailing. Specific combinations and interactions of forms of governance and school cultures (at the national or district/regional level) can variously influence the profile of school principals. The way schools operate, their margins of autonomy, the presence of a national or framework curriculum, the presence or lack of external mechanisms of accountability, as well as specific actors' perceptions or cognitive schemes are all crucial. At the same time, the amount and type of school autonomy are also relevant in terms of leadership tasks (mainly administrative, as in centralized countries, or enlarged with instructional and organizational responsibilities).

While most schools are provided with a principal, expressions such as 'leadership' and 'school improvement' may be unacknowledged in certain contexts or assume quite different forms compared to those accredited in different contexts. This is the case in France and Italy, for example, where efforts to improve schools through leadership at the school level are quite recent and occur in organizational contexts that present significant structural constraints. The absence of clear internal hierarchies and professional networks (in fatalist and flat organizations), in terms of structure and collaboration, impact negatively on instructional practices at large, including personalized approaches. In France, schools undertake self-evaluations every five years, followed by external evaluations. A similar accountability policy has been introduced in Italy where school self-evaluation is followed by the preparation of improvement plans. However, the wider centralized and bureaucratic arrangements have not been significantly altered. Even in systems characterized by flat hierarchies and weak school principalship, research results show that the principal can make a difference in the overall organizational capacity for improvement (Paletta et al., 2020).

Beyond such divergences, there are also key convergences in the type of tasks school leaders undertake and the relevance of their mission: ensuring school cohesiveness and supporting teachers in their work. This is particularly true in school systems where the school hierarchy is rather flat, teachers are highly autonomous, and the principal does not possess the relevant tools to motivate and reward good work; something that may not be culturally common or acceptable. In spite of the limitations, effective leaders can promote more curriculum alignment and professional development, and can reduce pedagogical fragmentation. Even in school systems where leadership is defined in administrative terms and is, consequently, rather 'weak', research shows its importance (Agasisti et al., 2019; Paletta et al., 2020). Based on the available research developed in areas of high school autonomy, leadership has been found to be second only to classroom teaching as an influence on pupil learning (Leithwood et al., 2008) and that the effectiveness of the principal is more important than the effectiveness of a single teacher (Grissom et al., 2021). The influence is both direct, i.e., instructional or pedagogical, but also indirect, i.e., transformational leadership through coordination and organizational measures. A research review of equitable school leadership (Leithwood, 2021) identified five domains and 22 types of practice in countries with high school autonomy, cases in which system governance models enhance leadership as an organizational aspect. All these domains (setting directions, building relationships and developing people, designing the organization to support desired practices, improving the organizational programme, and securing accountability) can be problematic areas of activity for principals in contexts where the school governance follows general public administration patterns.

Methodological note

This conceptual piece is based on previous governance-related work (Mincu & Liu, 2022; Mincu & Romiti, 2022), on comparative approaches to equity and personalization, as well as direct experience with all presented contexts, except for the People's Republic of China, through long-term ethnographic work. It provides snapshots of various governance profiles and leadership in different contexts, as well presenting theory-building-oriented case studies that illustrate different meanings of equity (Thomas, 2011). While schools can differ widely within one country, from rural to urban and between school types, common governance patterns, pedagogical culture, and challenges in terms of equity produce convergent tensions and leadership arrangements. In order to analyse governance interactions and leadership for equity, the paper includes three case studies of governance that will help to identify forms of interactions and cultural aspects that influence leadership configuration and its potential for equity. More specifically, it refers to (1) governance, school autonomy, and key pedagogical cultures, (2) equity meanings, (3) teachers' and leaders' curriculum agency, and (4) margins and profile of school principals.

Flat hierarchies and weak autonomy in France and Italy: School leadership in name only

France and Italy share a number of major convergences in their organization and cultures (Mincu & Granata, 2021): (1) flat horizontal school structures and very low school autonomy, (2) strong teacher autonomy in determining course content producing fragmented practices (as shown by Jerim et al., 2023; Schleicher, 2020), (3) traditional cultural settings as observed by Seashore-Louis (2015), which lack 'openness and risk-taking in personal and organizational lives' (p. 8), and (4) lack of instructional coherence and collaboration at the school level, in spite of an egalitarian culture (Van Zanten, 2004), in line with a 'professional culture of isolation, individualism, and egalitarianism in teaching' (Taylor et al., 2011, p. 921). Teachers' tasks are related to class teaching and those of principals are administrative, with some duties related to improvement, which are very recent and mostly bureaucratically performed.

In both countries, the profile of school governance is largely characterized by hierarchies, which are rather formal (accountability practices are reduced) and weakened by radical teacher autonomy. In France, a form of network governance is emerging, with school inspectors and trainers at the local *académie* level. In terms of pedagogical culture, equality is understood as homogeneity of inputs rather than equity of opportunities to address specific individual needs (CNESCO, 2017; Fondazione Agnelli, 2017). A certain egalitarianism in teaching in terms of single curriculum delivery and direct (homogeneous) teaching is very common (Taylor et al., 2011), while a qualitative study by Mincu and Granata (2021) indicates that student-centred instruction is the main innovation being trialled from the bottom-up in exceptional cases of informal teachers' leadership. Another paradox in fragmented school cultures (see Schleicher, 2020; Jerim et al., 2023) is a *de facto* curriculum uniformity sustained by longstanding cultural scripts or professional myths, despite ample margins of freedom that remain largely on paper only. In the absence of adequate training, especially at the secondary school level, teachers operate from the perspective of an imagined standardized curriculum that has to be covered and transmitted, and pupils'

evaluation can assume highly demoralizing, aleatory, and punitive forms. Such uniformity is moulded by an egalitarian culture, with fatalist notes (e.g., the selective cognitive schemes of comprehensive school teachers, Mincu, 2015a).

In this context, principalship is relatively weak and 'collegial' on the model *primus inter pares*, while middle leadership is equally weak or very formal. Principals do not explicitly engage with instructional matters in Italy (Paletta et al., 2020) while French headteachers do not engage with school pedagogy (Normand, 2015), which is an inspection task. Principals usually check teachers' presence in classes simply to have an adult in front of the students (Mincu & Granata, 2021). Their main tasks in France are routine administration, while the time dedicated to school development activities is very low. Tulowitzki (2012) correctly shows that the term 'leadership' has not been legitimate so far and that the image of the school principal as an instructional leader is not appropriate in the French context. Paradoxically, more focus on school improvement activities may reduce the fragmentation, not just at the school level but in the headteachers' work, who experience major disruptions in their daily work.

Despite the ample curricular autonomy available to teachers to design personalized opportunities of learning, according to an observational study by Fondazione Agnelli (2017) only two in 10 adapt their teaching. From previous research, the problem lies not just in how equity is framed but mostly in the support received from the school leadership. In rare cases, where the principal interprets their role as more supportive in terms of instructional and curricular decisions, teachers feel empowered and explore more progressive solutions, going beyond formalist (teacher-led) instruction. Such exceptions are telling in terms of broader governance and cultural patterns.

Markets and heterarchies in England: A case of a well-articulated leadership

England is a major example of the rise of school networks in education, especially after 2010, while the apparatus of hierarchical control has remained firmly in place. While school governance is highly characterized by hierarchies and networks (or heterarchies, according to Ball, 2009), the market as a form of governance is equally powerful in a quasi-market-based school system (Whitty & Power, 1997). School accountability is an influential hierarchical principle. The premise is that competition between schools will incentivize them to improve in relation to common standards. England is characterized by well-articulated organization of school and middle leadership. Under external pressures from markets and hierarchies, leadership can assume both a hierarchical and a collegial or distributed profile. Under the *academization* wave, school autonomy has been enhanced, with direct reporting to the Department of Education. From a social-regulation perspective, a hierarchist approach is combined with a fatalist type (Malin et al., 2020). Extended tasks beyond administration and teaching for headteachers and teachers are in place. However, school principals can act, in certain conditions as 'readers and writers of policy' (Gu et al., 2018, p. 354).

Unlike the two European contexts, equity in education follows a progressivist paradigm, on a robust student-centred model. Differentiation and a more general student-centred orientation in teaching are well-rooted in this country, as a 'concern for common and fair differentiation of standards' (Furlong & Lund, 2016, p. 251). The main barriers to their full realization come from an intense external accountability regime and competitive

environment (Fielding, 2012). principalship is usually enacted at the school level and is strongly influenced by interactive forms of governance. Leaders must cope with external accountability regimes, but it is debatable if their agency is eroded or enhanced by the type of school governance. More authentic forms of pastoral care and personalized learning can occasionally be inhibited by the external accountability regime, that can be internalized by headteachers in forms of very strict self-control (self-policing) aligned with the Office for Standards in Education, Children's Services and Skills (Ofsted) model. Robust research findings suggest, nevertheless, that successful school leaders do not compromise their own values and they find room to manoeuvre (Gu & Johansson, 2013). Teachers' availability and resources to personalize learning can be limited in some cases, given the intensification and standardization of their work. Based on previous ethnographic work (Mincu & Davies, 2019), personalization is mostly well-understood by teachers in England, although they may equally require spaces for reflection and clarification in the context of their school. However, if adequately supported, English leaders are well placed to find the right balance between accountability requirements and student-focused activities.

Multilevel hierarchies in China: Conflicting leadership tasks

Different combinations of governance mechanisms are in place in China. The traditionally centralized system, in which the hierarchical principle is predominant, is slowly and unequally transforming. System hierarchies encourage the creation of networks (between weak and good, rural and urban schools) to produce improvement. Professional networks are stimulated within schools, between teachers with different degrees of expertise, producing a top-down, contrived collaboration. Although the market of private schooling has been reduced and regulated, a competition principle in the public area is in varying degrees in evidence. The main tension is created by a mandated change: from teacher-led and textbook-based instruction to student-centred progressivist education, while the high-stakes exams based on traditional rote-memorization are still in place. Despite a certain level of school autonomy, central policies amply moderate it (Walker & Qian, 2020). A push towards local curriculum development has not proved successful in overturning the uniform implementation of curricula. An egalitarian culture, rooted in Confucianism and past socialist ideas, endorses teachers as the sole experts, while at the same time a variety of professionals have been encouraged and recognized (e.g., the 'backbone' teachers), with classroom teachers being required to engage in mentoring activities. Despite significant contradictions, a major transformation of the pedagogical culture, requested by the Ministry, is slowly diffusing in a Jacobin pattern (Chen & Day, 2015). Chinese principals interpret the context in innovative ways, implementing a *sui generis* instructional leadership model (Walker & Qian, 2020) and succeeding in delegating, energizing, and supporting teachers in a variety of ways. For instance, in certain schools, both pedagogical cultures co-exist, and teachers are allowed to teach differently based on their expertise (formalist vs. progressivist), on the subject specificities, and on the time in the school year. Teachers perform more tasks beyond teaching, being both vocationally committed and exceptionally resilient (Gu & Li, 2015), and headteachers increasingly cover organizational and instructional tasks.

Some key features discussed so far are synthesized in Table 1.

Table 1 Curriculum, autonomies, and pedagogical cultures

	Italy	France	China	England
Curriculum	Autonomy (textbook based uniformity)	Autonomy (textbook based uniformity)	Autonomy (uniformity: formalism, high stakes exams)	Autonomy (high stakes exams uniformity)
School autonomy	Low	Low	Moderate	High
Teachers' autonomy	Very high	High	Moderate	Moderate
Pedagogical culture	Formalism	Formalism/limited differentiation	Formalism, emergent progressivism	Progressivism

Discussion: System governance arrangements, curriculum, and leadership for equity

Constraining factors in effective leadership and in equitable teaching

In flat organizations, in which principals act as *primus inter pares* and their instructional leadership is not a required competence, teachers lack orientation and support. They lack formal opportunities to engage with pedagogical issues at the school level on a regular basis (Italy) or may seldom be offered centralized training by the local *académie* (France), where inspectors also act as trainers. The principals is an administrator, usually reluctant to engage in pedagogical matters in contexts in which teacher autonomy is a major principle. When individual teachers act with leadership, they tend to hide their behaviour from peers and principal alike, for fear of being hindered. Even in cases where a teacher is a recognized expert in a professional network outside their own school, they will tend to avoid sharing their expert knowledge in their own organization (Mincu & Granata, 2021). The reason is to be found in the egalitarian culture, which is, paradoxically, based on a complete autonomy of teachers in their classes, in the absence of forms of peer-alignment and accountability. Professional development—as well as teaching standards or peer/external forms of control—occurs as a ritual or may be entirely lacking (as over recent decades in Italy). Even in cases where principals adopt more persuasive attitudes, teachers can withdraw from proposed activities beyond teaching, and actively oppose measures of school coherence, with formal complaints to administrative courts or through unions. Personalization as a form of student-centred pedagogy is traditionally very weak in these countries, particularly at the secondary school level. The lack of leadership quality in such organizations is one of the main barriers to changing the pedagogical culture.

The English and the Chinese cases share some key characteristics in that principalship is under significant external pressure in both countries (Zeng & Day, 2019). The tension seems higher in China, given the clear misalignment between the requirements to radically transform the pedagogical model and the pressure to cope with the high-stakes exams. England shows a well-rooted principalship model, which can be either convergent or divergent with the national policies. Parents do not favour progressivist education in China, because they correctly interpret the risk posed by the dissonance on which the system is based. Progressivism has deeper roots in the English system and commands the support of parents. However, the intense school autonomy can lead, in

different circumstances, to personalization being approached as a technical requirement, rather than equity of care (Fielding, 2012).

What system governance arrangements enhance school principals to support personalization?

Related to the question of what leadership can do to facilitate equity, in all contexts there is scope to engage with a conceptual and operational clarification about what it means to be equitable, beyond traditionally rooted practices that may be more, less, or not at all equitable. In France, teachers show a sophisticated approach and consider that parents can be made more aware of the benefits of differentiation when labelled ‘individual adaptation’. In China, principals’ expertise in teaching and role-modelling is a facilitating factor in pedagogical terms. The presence of experts (classroom teachers in China) or trainer-inspectors in France is a facilitating factor. Such professionals disseminate knowledge and laterally stimulate change in a non-hierarchical and, potentially, deeper and more authentic way. The clear organizational architecture in England accelerates the infusion of equity-oriented knowledge. The slightly amplified school autonomy in China, compared to the two European contexts, as well as stringent national policies, prove to be more effective tools that galvanize this context and its leadership practices. Innovative, however hectic, organizational, and instructional leadership practices aim to cope with the assigned, though highly contradictory, tasks.

In response to the second RQ, *how can school principals encourage, at least in part, personalized instruction in diverse contexts*, it appears that several measures can be productive: (1) involving parents and communicating/negotiating a vision of equity that considers the individual, (2) stimulating more authentic collaboration between teachers, primarily in centralized contexts, and (3) the possibility for the school principals to make use of national policies that clearly propose student-centred equitable approaches. It appears that where leadership extends beyond mere administrative tasks, as in China and England, the presence of certain structures and hierarchical arrangements can also foster greater collaboration and initiative, even if at times it is contrived. In egalitarian and fatalist school cultures, teachers can choose the *exit* option and avoid engagement in any collaborative efforts. Even if progressivism is not fully embraced or understood, in the Chinese case, huge explicit efforts are deployed and may eventually lead to some partial changes. Other key elements considered are summarized in Table 2.

Conclusion

Schools around the world are very diverse and research on system governance, principalship, and equity needs to broaden its horizons, to learn from the challenges experienced in different cultures and organizations. As highlighted earlier, there is a lack of leadership as an organizational quality in certain contexts that needs to be recognized. This is in line with what Gurr and Drysdale (2013) consider as a consistent finding: ‘too many people in leadership roles are not leaders, do not have an expectation of being a leader, and do not have the organisational support to be leaders’ (p. 62).

Different languages may rebuff the term (and the concept of) leadership; at the same time, different school practices are ineffective and not equitable—it is indeed necessary to engage with the long-standing and diverse dysfunctionalities and learn from them.

Table 2 Macro-types of school governance and leadership and equity conceptions

Macro-types	Flat			Hierarchical
	Administrator	Administrator	Organizer	
	Italy	France	China	England
Governance combinations	Formal hierarchies Some competition between schools	Formal hierarchies Networks (of profes- sionals) Low competition between schools	National and provincial levels hierarchies & Networks (within and between schools) High market competition	National and school level hierarchies Networks (professionals, within & between schools) Markets
School leadership	Administrator	Administrator	Administrator Organizer Emergent organizational & instructional leader	Organizer Instructional leader Administrator
Equity & personalization	Egalitarianism	Egalitarianism Some differentiation	Egalitarianism Increased student-centred approaches Teaching to the test limitations	Well-established student-centred approaches Successful leaders promote curriculum enrichment (Day et al., 2016)

The two macro-types, flat and hierarchical, suggest that the possibility to act with leadership is related to the presence of tasks beyond mere administration. In France, the presence of some pedagogical differentiation is linked to national policies formally in place for some time, while low school autonomy appears to be an important facilitating factor in China, as well as more robust recent policies toward student-centred approaches. In the end, the student-centred approaches are eroded by high-stakes exams, both in China and England, while being supported by organizational and instructional leadership models.

Finding the right balance between disconnected peer networks and intense hierarchies seems to be the solution: flat structures lacking accountability measures or excessively pressurized contexts are equally dysfunctional. Most school systems in some very poor countries around the world do not benefit from well-articulated school organization. In fact, less consolidated school systems are mostly centralized at the ministry level, with a mix of flat, formalistic cultures at the local level. Based on this exploration and on the available research, pedagogy oriented to meeting students' needs does not seem to flourish in egalitarian, fatalistic, and general administration modelled organizations, and this should be considered in any effort for change around the world.

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