Written Ministerial Statement

The content of this written ministerial statement is as received at the time from the Minister. It has not been subject to the official reporting (Hansard) process.

Department of Education

AN ASSESSMENT OF THE EVIDENTIAL ROBUSTNESS OF DR CARMEL GALLAGHER'S CRITIQUE OF CURRICULUM 2028

Published at 12.30 pm on Monday 26 October 2026

Mr Givan (The Minister of Education):

Introduction

Dr Carmel Gallagher, former Director of Curriculum and Assessment at the Council for the Curriculum, Examinations and Assessment (CCEA), Registrar of the General Teaching Council for Northern Ireland (GTCNI) and key architect of the current Northern Ireland Curriculum, has published a paper critiquing the proposals for the new Northern Ireland Curriculum 2028.

This was covered by the Belfast Telegraph on Saturday 24 October 2026. Regrettably, despite my Department providing a detailed 3,000 word analysis of the flawed arguments presented by Dr Gallagher, the newspaper decided not to engage further with the evidence around this issue.

While presented as an evidence-informed critique, the paper frequently substitutes assertion for evidence, omits material context, misstates key facts and repeatedly critiques positions that are not contained within either TransformED or the Strategic Review. The cumulative effect is not a balanced evaluation of the proposals but a defence of the existing curriculum framework and the educational philosophy on which it is based.

The paper frequently blurs the distinction between evidence, opinion and advocacy.

Where evidence is mixed or contested, it consistently privileges material that supports the author's position whilst disregarding any evidence to the contrary. Alternative interpretations are rarely acknowledged, and contrary evidence is often excluded altogether.

A further difficulty is that the paper repeatedly evaluates proposed reforms against the 2007 Northern Ireland Curriculum, a framework the author helped design and develop. The paper therefore frequently amounts to a defence of a model for which the author bears significant intellectual ownership. Readers should bear this important contextual consideration in mind throughout reading.

Most strikingly, many of the paper's strongest allegations are framed as questions, or suggestions rather than evidenced conclusions.

In several places, the paper criticises positions that neither TransformED, nor the Strategic Review of the Northern Ireland Curriculum actually adopt. Examples include:

- suggestions that curriculum reform alone is expected to solve educational inequality;
- suggestions that cognitive science is being treated as a complete theory of education;
- suggestions that knowledge-rich approaches reject creativity, dialogue, inquiry or critical thinking; and
- suggestions that curriculum reform is intended to replace wider investment in SEN, wellbeing, disadvantage or even the school estate.

None of these are correct and, therefore, the paper frequently critiques simplified or non-existent versions of reform proposals rather than engaging with their actual content.

A detailed analysis of the paper identifies five recurring weaknesses:

- factual inaccuracies;
- omission of material contextual information;
- selective citation of evidence while disregarding contrary evidence;
- criticism of positions not advanced by TransformED or the Strategic Review; and
- a recurring tendency to present speculation and inference as though they were evidence-based conclusions.

These weaknesses are not isolated occurrences but emerge repeatedly throughout the paper and materially affect the reliability of its conclusions. A detailed examination is provided below for members and all interested stakeholders. The attached factsheet sets out the factual position in regard to curriculum reform.

Examples of inaccuracy, omission, misrepresentation and unsupported assertion

Page 4 - Selective treatment of stakeholder engagement

The paper devotes considerable attention and detail to a ministerial dinner, creating an impression of exceptional significance. However, no context is provided regarding my wider programme of engagement, which has included numerous meetings involving school leaders, academics and education stakeholders from a broad range of perspectives and backgrounds

I have hosted a wide range of practitioners, school leaders and academics at Stormont for similar events. Examples include the Principals of Stranmillis University College and St Mary's University College and representatives from Queen's University such as Professor Tony Gallagher. The paper does not indicate why this particular event is discussed in greater detail than other engagement activities.

Page 5 - Incorrect contractual claim

The paper incorrectly refers to a purported £38,426 Direct Award Contract for Daisy Christodoulou. This is entirely incorrect and is a significant factual issue because it is used to support a wider narrative regarding influence and procurement.

Page 6 - Misleading characterisation of Daniel Muijs

The paper presents Daniel Muijs principally as part of an external network. It omits the fact that he is Professor of Education and Head of the School of Social Sciences, Education and Social Work at The Queen's University of Belfast. This omission materially affects the reader's understanding of local academic involvement.

Pages 6-7 - Misdescription of the Curriculum Taskforce

The paper repeatedly conflates the Taskforce Advisory Committee, a small advisory group, with the wider Curriculum Taskforce. These are not the same entity. The Curriculum Taskforce involved approximately one hundred local academics, school leaders and practitioners. By incorrectly presenting the Advisory Committee as "the Taskforce", the paper gives a misleading impression of the breadth of expertise involved in curriculum development.

Page 6 - Misleading Presentation of Staff

Dr Grace Healy and Matea Marcinko are on secondment and all required NICS procedures were followed. An incorrect impression of irregularity is given for which no evidence is offered. The Department has around 15 secondees from CCEA, local schools and universities working on TransformED areas, including on school improvement, qualifications, Irish-medium education and literacy. This approach allows educational expertise to work alongside policy colleagues. This is completely overlooked in the analysis, which singles out two seconded English academics.

Page 7 – Factually incorrect assertions regarding the International Advisory Panel Membership

The paper claims that only two members of the International Ministerial Advisory Panel come from outside England. This is again factually incorrect. The Panel includes members from Ireland, New Zealand, Australia and the United States, as well as England.

Equally notable is the complete omission of the local academics panel and two principals' reference groups established by the Department to support TransformED, all of which consist entirely of local expertise.

The aim is to balance international and local expertise.

Page 7 - Conflict of Interest Allegations

Conflict-of-interest procedures formed part of all appointment arrangements to the Taskforce Advisory Committee. Criticism is made without any fact checking with my Department.

Page 8 - The "Script" narrative

The evidence presented in support of the alleged existence of a predetermined "script" is exceptionally weak. The existence of reading material, engagement with curriculum experts and ministerial clarity of policy intention do not demonstrate predetermination of detailed design. The accusation is also deeply insulting to the significant numbers of local practitioners who gave their time to support the work.

Indeed, evidence from an entirely separate policy development process for the curriculum framework for Initial Teacher Education is repurposed to support this narrative.

In addition, the UCETNI criticisms cited of the Initial Teacher Education framework, which are referenced relate to an early draft framework prepared by Professor Muijs rather than the final framework ultimately adopted. The paper fails to inform readers that extensive revisions were made following consultation with local universities and practitioners. It also omits commentary from educational observers who have highlighted significant differences between the Northern Ireland and English approaches to the framework.

The conclusion therefore does not follow from the evidence presented.

Page 8 - Speculation regarding university college principals

The paper attributes motives to the Principals of Stranmillis and St Mary's University Colleges regarding their support for Initial Teacher Education Framework. No evidence is offered to support these assumptions, which are entirely incorrect. The section amounts to conjecture presented as analysis.

Page 9 - Democratic legitimacy

The paper states:

"While an elected official holds a mandate to set broad societal goals for education, policy must remain broad enough to accommodate diverse, legitimate worldview frameworks rather than promoting 'one direction'."

This is a philosophical position rather than an established constitutional or democratic principle. In any representative democracy, political parties seek election on the basis of policy programmes and once elected are expected to pursue those policies, subject to public scrutiny. Education is not exempt from this process.

The paper appears to object not simply to the manner in which reform is being pursued, but to the existence of a clear policy direction by my Department. However, having a defined direction for reform is not evidence of impropriety; rather it is the normal consequence of democratic government. Ministers are elected to make choices between competing policy approaches.

The paper does not explain why curriculum policy should be treated differently from other areas of public policy, nor why a democratically elected Minister is entitled to pursue broad reform in areas such as health, infrastructure, justice or economic development, but should be constrained from doing so in education.

The implication appears to be that curriculum reform is only legitimate when it aligns with the educational philosophy advanced in the paper.

Page 9 - Unsupported claim of suppressed dissent

The paper asserts that professional disagreement has been suppressed. The existence of the paper itself, numerous public critiques of TransformED, extensive stakeholder engagement, and a public consultation generating over 4,000 responses all point to significant opportunities for challenge and

debate. Schools were explicitly asked to use their TransformED Day to enable teachers to have dedicated time to examine and respond to the consultation proposals.

My officials are meeting with a wide range of stakeholders to hear their views of the proposed curriculum as part of the consultation process and are willing to meet with all education stakeholders.

Many TransformED proposals have been enhanced and tailored following public engagement and feedback. To give just two examples. The timeline for first implementation of the new curriculum was moved from September 2027 to September 2028 to give more time for professional learning and preparation. Similarly, the proposal to introduce a linear A Level was changed to introduce a bespoke modular A Level for Northern Ireland, reducing the number of exams but retaining at Year 13 assessment.

Page 18 – Misrepresentation of Thinking Skills and Personal Capabilities

The author asserts that the Department has misrepresented Northern Ireland's Thinking Skills and Personal Capabilities as 'generic skills' developed in a knowledge-free context. She highlighted they were never an alternative to disciplinary knowledge. and were designed to strengthen it by helping pupils interrogate, organise, connect and use what they learn, and to help teachers make those intellectual processes visible.

This is expressly acknowledged in the Strategic Review of the Northern Ireland Curriculum. Page 16 states, *'The Thinking Skills and Personal Capabilities framework states that the skills included cannot be taught separately but need to be 'infused' with knowledge. The associated guidance on thinking skills development recognises that performance in tasks requiring these skills also depends on the level of prior knowledge a child has in the domain.'* This is the very point the paper's author also makes.

However, more broadly the lack of specificity and vague competency statements within the 2007 Curriculum have led to a lack of focus on the sequencing and development of disciplinary knowledge.

Page 24 - Incorrect claim regarding underachievement

The paper states that Northern Ireland has the "longest tail" of underachievement in the United Kingdom. No evidence is provided for this assertion. International and UK performance data show that attainment outcomes in Wales are significantly lower than Northern Ireland, including amongst lower-attaining pupils.

Page 24 - Grammar schools and attainment and criticism of capacity in non-selective schools

The paper states that "access to a grammar school remains a strong predictor of educational attainment".

This is highly dismissive of non-selective schools across Northern Ireland and undermines the excellent work carried out in these schools. It also fundamentally confuses correlation with causation.

Children in grammar schools have significantly higher levels of prior attainment on entry and they therefore tend to have higher public examination outcomes. The paper provides no evidence to support its inaccurate claim that school type, rather than intake characteristics and prior attainment, explains subsequent outcomes.

The implication later in the next paragraph that non-selective schools lack comparable professional capability is both unsupported and unfair to the excellent work undertaken across the non-selective sector.

Page 24 - Mischaracterisation of TransformED

The paper criticises an alleged position that curriculum prescription alone can create equality. No such claim is made within TransformED. The paper therefore critiques a position that TransformED absolutely does not hold.

TransformED itself, as well as all supporting documentation has indicated consistently that a multi-faceted approach is needed to improvement across investment in professional learning, curriculum, assessment, qualifications, school improvement and wider educational disadvantage. It also emphasises the links to and importance of other key areas of investment including SEN, wellbeing and early years.

Notably, TransformED has funded school clusters to hold 100 Research-Informed conferences not only on science of learning but also subject-specific learning, early years, SEN, assessment and curriculum.

For example, the recent Written Ministerial Statement on Key Stage Outcomes specifically states:

That is why TransformED provides a renewed focus on the core areas of: curriculum; assessment; qualifications; tackling educational disadvantage; and school improvement. Reform in each of these areas is underpinned by greater investment in and a more coherent approach to Teacher Professional Learning. These are key factors that shape high-performing education systems. They are not peripheral issues but rather they are the fundamental building blocks of educational excellence. We are now feeling the impact of the limited focus or investment during the past decade. All need review, evaluation and improvement.

This is not, however, as is sometimes mischaracterised to the exclusion of other priorities. Many other wider areas of my Department's work are complementary to and complemented by TransformED. The world's highest-performing systems consistently invest in quality early years education – getting children ready for formal learning through well-structured and purposeful play. This helps children develop the language, literacy, numeracy, social and cognitive foundations that underpin future success. It is one of the most effective ways to improve outcomes, narrow attainment gaps and reduce educational disadvantage before it becomes entrenched. That is why I am delivering significant additional investment in and expansion of early years provision. Similarly, there is a need for greater investment in health and well-being interventions and pastoral care. It is also vital that the needs of pupils with SEN are carefully integrated into educational reform. TransformED links closely to the SEN Reform Agenda. Quality provision for children with SEN must be underpinned by up-to-date, evidence-informed practice and shaped by research on what works."

Page 24 - Misrepresentation of cognitive science

The paper repeatedly criticises a narrow interpretation of cognitive science. It states: *A narrow interpretation of cognitive science is used to justify explicit instruction, memorisation and retrieval practice as ways to transfer knowledge into long-term memory and reduce demands on working memory. These approaches can reduce ambiguity and support pupils who are struggling. The difficulty arises when they are treated as a complete account of learning. Affective science also shows that attention, relevance, motivation and emotion influence whether information is selected, encoded, and consolidated in memory*.

However, the paper fails to establish that TransformED adopts such an interpretation. This is because it does not.

Indeed, the TransformED Strategy (p. 34) explicitly references the importance of subject-specific pedagogy rather than generic applications of cognitive science. The importance of subject-specific pedagogy is also emphasised in curriculum development and will be a key feature of the pedagogical principles. The criticism attacks a position that has neither been adopted by TransformED or the curriculum review.

Indeed, the TransformED Science of Learning funded monthly newsletters actually include topics such as engagement, developing motivated students, the impact of sleep on learning and metacognition.

Page 25 - Selective use of mental health evidence

The discussion of mental health is highly selective. The paper strongly implies links between knowledge-rich curriculum reform and worsening pupil wellbeing while failing to acknowledge that rising mental health concerns have occurred:

- across the UK;
- across Europe;
- internationally.

The broader evidence points towards factors such as poverty, family pressures, social media, loneliness, sleep disruption and the effects of the pandemic rather than curriculum design.

Over the past decade, curricula across the United Kingdom has been monitored both for educational outcomes and the wellbeing of pupils. As with any data set, it is not possible to isolate merely to one variable. However, for the purposes of comparison, during a similar period, where data is provided there has been similar feelings about schooling and wellbeing in England, Scotland and Wales despite very different educational policies being implemented.

In Wales, for example, under a skills-based curriculum, rates of diagnosable mental health conditions among children and young people are estimated to have doubled over the past two decades, rising from around one in ten in 2004 to one in five in 2023. Similar concerns have been reported internationally, regardless of the specific structure or content of national curricula.

This suggests that the differential was not in the educational policies alone but in wider societal factors. Put simply, it is not possible to say that a skills-based curriculum makes pupils happier or a knowledge-rich curriculum makes pupils unhappy; based on the data, this is not the case.

Page 25 - Unsupported link to school maintenance

The suggestion that a knowledge-rich curriculum risks diverting attention from school maintenance lacks any evidential or logical basis. Curriculum policy and estate management are distinct policy areas. The Department has consistently advocated for additional investment across the schools' estate, particularly to meet the requirement for specialist SEN places.

Regrettably, such funding has not been secured for investment in the school estate. Around £150m of additional capital (not resource) funding is required annually across the education estate. The several hundred thousand pounds of resource funding invested in curriculum reform would make marginal impact.

Indeed, the argument appears internally incoherent. If accepted, it would imply that no reform in any area of education should proceed until infrastructure challenges have been resolved. Such a proposition would effectively prevent progress on curriculum, assessment, qualifications, special educational needs, educational disadvantage, teacher professional learning or any other major policy area whenever capital pressures exist within the system.

Page 25 - Other measures

The paper states that "*Curriculum reform must therefore be accompanied by explicit structural, financial and inclusion measures*".

The Department agrees that education requires urgent additional funding, but the Executive as a whole is facing a funding crisis.

SEN Reform is already a key pillar of the Department's policies.

There is no suggestion that the Department is only taking forward curriculum reform.

It may be tempting to inquire what structural, financial and inclusion measures accompanied implementation of the 2007 curriculum? A curriculum, which even its advocates such as Dr Gallagher admit, floundered in implementation.

Page 26 - Absence of bespoke frameworks

The paper argues that Irish-medium and special-school curriculum frameworks should be completed before wider curriculum reform proceeds. Yet the curriculum defended throughout the paper has operated for almost two decades without such bespoke frameworks. Indeed, this was a key criticism emerging from Lucy Crehan's Strategic Review of the Northern Ireland Curriculum. The inconsistency is striking.

Work on both Irish-medium and Special School frameworks is ongoing, with over 50 local practitioners involved. Both will be in place well before curriculum implementation commences.

Pages 27-28 - Rejection of design criticisms of current curriculum

The paper dismisses concerns regarding the design of the 2007 curriculum and attributes problems primarily to implementation. This position is difficult to reconcile with Lucy Crehan's Strategic Review, which identified numerous structural weaknesses within the curriculum architecture itself that were highlighted by stakeholders across Northern Ireland.

These include:

- being too high-level and insufficiently specified, leaving major decisions about content to individual schools and teachers rather than providing a clear entitlement for all pupils;
- lacking clarity about what pupils should know, resulting in significant variation in curriculum content between schools;
- failing to establish a coherent sequence of knowledge, making progression between phases and key stages inconsistent;
- insufficient curriculum coherence across phases, particularly between primary and post-primary education;
- failing to define a sufficiently ambitious common entitlement, resulting in unequal access to knowledge depending on where pupils attend school;
- insufficient focus on the cumulative nature of learning and how knowledge should build systematically over time;
- limited recognition of the role of prior knowledge in learning, potentially disadvantaging pupils who lack access to knowledge outside school;
- subject content not being clearly identified or sequenced, creating uncertainty about essential learning within disciplines;
- the absence of a bespoke curriculum framework for Irish-medium education;
- the absence of a bespoke curriculum framework for special schools and learners with complex needs; and
- learning areas not always being organised around strong disciplinary structures, reducing clarity about subject purposes and progression.

These are fundamental design issues, not implementation issues.

Pages 29-31 - Failure to acknowledge existing TransformED commitments

Dr Gallagher's paper makes repeated recommendations relating to:

- AI-enabled professional learning;
- digital resource development;
- collaborative teaching platforms;
- access to AI tools; and
- teacher experimentation with generative AI.

The paper completely fails to acknowledge that these are already reflected within existing TransformED commitments. The paper frequently presents these proposals as absent when they are already departmental policy.

A key commitment within TransformED is to make available high-quality digital resources and to use AI to do this. Even a cursory review of relevant documentation would have identified this. For example, the Curriculum Overview document states:

To ensure the curriculum framework 'comes to life' in schools, there will be significant investment to develop a suite of high-quality curriculum aligned teaching resources and lesson materials for teachers and pupils. It is anticipated that a new digital curriculum resource hub will provide high-quality lessons and resources designed to help teachers plan more easily and reduce workload.

Dr Gallagher's paper states:

"Post-primary teachers can now avail of licences to access generative AI tools through C2K/EdIS, supported by professional learning. The same infrastructure could make teacher development central to TransformED: every teacher could learn in a protected environment, test subject-specific uses, share resources and contribute evidence about what improves learning."

However, the paper fails to acknowledge that these very AI licences were funded by the Department as part of the professional learning funding provided through TransformED and that the development of a digital Teacher Professional Learning Platform is already a key TransformED commitment.

Page 33 - Defence of the 2007 Curriculum

The paper states:

"I helped to devise the 2007 Northern Ireland Curriculum after extensive research and consultation and have advised on curriculum internationally."

It should be noted that Christine Counsel, Lucy Crehan and other members of the Taskforce Advisory Committee have also advised extensively on curriculum reform internationally. Indeed, involvement in the design of the Flanders Curriculum by members of the Committee is portrayed negatively elsewhere in the paper.

This acknowledgement is also important because it highlights a significant limitation running throughout the paper: the author is not assessing the 2007 curriculum as an independent observer, but as one of its principal architects.

Much of the paper amounts to a defence of a curriculum for which the author bears substantial intellectual responsibility. Yet there is remarkably little engagement with the extensive structural criticisms identified in the Strategic Review of the Northern Ireland Curriculum. The review concluded that the current curriculum is overly broad, insufficiently specified, lacks coherent sequencing of knowledge, provides an inconsistent entitlement for pupils, and places excessive responsibility on individual schools and teachers to determine curriculum content.

Rather than engaging substantively with these findings, the paper frequently attributes shortcomings to implementation while seeking to shield the curriculum's underlying design from criticism. This is difficult to reconcile with the evidence gathered through the Strategic Review, which found widespread concern among practitioners and stakeholders regarding the curriculum's architecture itself rather than merely its implementation.

The paper therefore asks readers to accept that the principal weaknesses identified after almost two decades of operation lie everywhere except in the design of the curriculum itself.

This is a difficult position to sustain given the breadth of evidence presented by the Strategic Review and the significant decline in Northern Ireland's educational performance relative to many comparator jurisdictions during the period in which the curriculum has been in place.

The result is a document that often reads less as an objective evaluation of reform proposals and more as a defence of a legacy policy for which the author has a personal and professional investment.

Overall Conclusion

The principal difficulty with this paper is not that it reaches different conclusions from the Strategic Review or from TransformED. Legitimate disagreement is an essential feature of educational debate. The difficulty is that many of its most serious allegations are not supported by evidence of equivalent strength.

Across the document there is a recurring pattern of factual error, omission of relevant context, selective use of evidence, unsupported inference and criticism of positions which neither TransformED nor the Strategic Review actually advance.

The cumulative effect is that the paper frequently critiques a simplified and at times inaccurate representation of curriculum reform proposals rather than the proposals themselves.

Most significantly, the paper asks readers to reject the conclusions of the Strategic Review while offering limited engagement with the evidence base on which those conclusions rest. The weaknesses identified by the Review are therefore not substantively rebutted but are often characterised as implementation issues.

As a result, the document is more accurately understood as a defence of the existing curriculum and its underlying philosophy than as an objective, evidence-informed assessment of the proposed reforms

Curriculum 2028: Evidence, Engagement And Development

The proposed curriculum has been developed through independent review, evidence gathering, practitioner participation and public consultation.

How the proposals have been developed

- **Independent strategic review.** A thorough evidence-based examination of the existing curriculum and its strengths and weaknesses (NI Curriculum Review).

- **Evidence and stakeholder input.** Evidence gathering, teacher surveys and engagement with education stakeholders.

- **Curriculum Taskforce.** An Advisory Committee alongside a wider Taskforce involving around 100 local academics, school leaders and practitioners.

- **Practitioner-led development.** Subject working groups involving Northern Ireland teachers in drafting curriculum content.

- **Local and international expertise.** Local academic input, principals' reference groups and an international Ministerial Advisory Panel.

- **Public consultation.** A 16-week consultation on Curriculum 2028, with over 4,000 responses, alongside significant engagement with practitioners across the education system, including six roadshows for school leaders.

- **Bespoke frameworks.** Local practitioners are contributing to bespoke frameworks for special schools and Irish-medium education.

- **Time for professional input.** TransformED Day and resources to support teachers to examine, consider and respond to curriculum proposals.

Why change is proposed

The Strategic Review identified significant concerns about the existing curriculum being insufficiently specified, inconsistent in the sequencing of knowledge and unclear about the common entitlement for pupils.

Curriculum 2028 provides greater coherence, clarity and progression.

Reform extends beyond curriculum content

TransformED also encompasses assessment, qualifications, teacher professional learning, school improvement and tackling educational disadvantage. Wider work on Special Educational Needs, wellbeing and early years complements the TransformED Programme.

KEY MESSAGE: Teachers and school leaders have a key role in the development of curriculum content.