

The future delivery of education services in Wales

Consultation response form

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Responses should be returned by **13 September 2013** to:

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or completed electronically and sent to:

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The future delivery of education services in Wales: suggested options

Improving teaching and learning (pages 16–35)

1:1 option – Use high-quality schemes of work from excellent schools to help weaker schools plan and implement the National Literacy and Numeracy Framework. Use the Learning Wales site as a repository for these to be shared.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This option should be supported as it represents continuation of school improvement good practice already embedded in improving authorities and consortia. It is an option that reflects previous social partnership work embodied in the national Improving Schools Plan.

1:2 option – Provide access to a sufficient range of materials and resources in Welsh to support the application of the National Literacy and Numeracy Framework across the curriculum.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This option should be supported as it represents continuation of school improvement good practice already embedded in improving authorities and consortia. It is an option that reflects previous social partnership work embodied in the national Improving Schools Plan.

1:3 option – Ensure that literacy and numeracy training is focused on improving classroom teaching, including effective teaching of phonics, reading recovery, writing and numeracy skills, and that delivery is closely coordinated with regional consortia.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This option should be supported as it represents continuing school improvement good practice already embedded in improving authorities and consortia. It is an option that reflects previous social partnership work embodied in the national Improving Schools Plan.

1:4 option – Introduce a standardised tracking system for literacy and numeracy for all pupils in Years 2 to 9 across Wales.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This is supported in terms of its potential in developing consistency in and understanding of performance challenges. However, experience also shows that getting the level of standardisation and consistency that is desirable remains a significant challenge.

1:5 option – Make extensive use of the Improving Teacher and Outstanding Teacher Programmes.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This option should be supported as it represents school improvement good practice already embedded in improving authorities. It is an option that reflects previous social partnership work embodied in the national Improving Schools Plan.

All partners need to make faster progress towards creating an Academi or Virtual Staff College for education. A Welsh model learning from the National College for School Leadership (NCSL) programmes would address a key current national systemic shortfall.

1:6 option – Set up a nationally approved list of schools from inside and outside Wales to provide classroom and whole-school support and make the list available for consortia and schools to use.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

Improving Authorities already use such strategies to identify practitioners to participate in system leadership. There is no objection to such networks or lists being shared either at consortium level (as at present) or nationally to enable support to be brokered on a wider basis.

Our experience and data analysis regionally suggests that there is further to go to address unacceptable ranges of performance within schools. This suggests that there is scope for more “internal consultancy” spreading consistent effective pedagogy and performance management across phases and departments.

1:7 option – Promote the Education Endowment Foundation toolkit on closing gaps in attainment and link it to using the Pupil Deprivation Grant.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

The Minister was present and kindly spoke at the highly successful North Wales addressing poverty in education conference. Whilst the toolkit is acknowledged as an important development tool, practitioners gained most from sharing effective contextualised practice. We need to ensure developments such as the Hwb, teach meets and Professional Learning Communities have access to such material and learning.

1:8 option – Identify and train Lead Practitioners and Lead Practitioner departments to maximise the skills of the best teachers.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This option should be supported as it represents school improvement good practice already embedded in improving authorities. It is an option that reflects previous social partnership work embodied in the national Improving Schools Plan.

All partners need to make faster progress towards creating an Academi or Virtual Staff College for education. A Welsh model learning from the National College for School Leadership (NCSL) programmes would address the loss that Welsh education system has experienced through being unable to access the high quality programmes available across the border.

1:9 option – Increase the numbers of teachers trained and deployed in partnership with Teach First.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

It is not clear why Teach First as an individual programme is identified. It is only one organisation and other more local approaches to making appropriate provision are available.

1:10 option – Expand employment and school-based routes into teaching as Lead Practitioner Schools, federations and clusters develop.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

As federations and clusters develop they will be increasingly well placed to provide localised training and development routes for all aspects of the school workforce. These would appropriately be developed in partnership with potential accreditation bodies.

1:11 option – Use the curriculum reviews at Key Stages 2 and 4 to ensure that the curriculum prioritises key areas of knowledge and skills.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This option should be supported as it represents school improvement good practice already embedded in improving authorities. It is an option that reflects previous social partnership work embodied in the national Improving Schools Plan.

However, as an option it doesn't state anything significant as any reasonable curriculum review would look at skills and knowledge content.

1:12 option – Extend use of video technology to support classroom coaching.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This is one mechanism for disseminating good examples of teaching and learning in a coaching context. However, it is only one tool amongst many and needs to be used appropriately.

1:13 option – Invite the review of Welsh second language teaching that is already under way to consider:

- extending the use of immersion groups and secondments to Welsh-medium schools to boost the language skills of teachers teaching Welsh as a second language
- whether or not functional skills in Welsh should form part of the core requirement.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

These considerations are supportable and are consistent with local Welsh Education Strategic Planning.

1:14 option – Increase the number of Lead Practitioner Schools without comprising on quality, and ensure that special schools and Welsh-medium schools play a full role in the programme.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

Improving Authorities already use such strategies to identify practitioners to participate in system leadership. There is no objection to such networks or lists being shared either at consortium level (as at present) or nationally to enable support to be brokered on a wider basis.

Our experience and data analysis regionally suggests that there is further to go to address unacceptable ranges of performance within schools. This suggests that there is scope for more “internal consultancy” spreading consistent effective pedagogy and performance management across phases and departments.

1:15 option – Delegate resources from local authorities to federations and hard clusters of schools (that include Lead Practitioner Special Schools) to be responsible for education welfare services and the provision of additional learning needs.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

The principle is positive and offers the potential for more localised service provision designed around individual children, young people, parents and carers.

However, in terms of practical implementation, the delegation of additional funding in isolation from careful local modelling, service development and professional development of staff represents a major risk to vulnerable children, young people and their parents and carers.

1:16 option – Use Estyn inspections to assess how well schools are deploying their Pupil Deprivation Grant funding and closing gaps in attainment.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

It is appropriate that the inspectorate assess school strategies' impact on closing the gap in attainment.

There is a separate piece of work that should be undertaken to streamline the present regime for planning and accountability for specific grants. The key mechanisms should be the school's integrated improvement planning and self-evaluation processes and documents.

1:17 option – Continuing professional development (CPD) for teachers within schools needs to be closely aligned with initial teacher education, in particular it is vital that teacher trainees coming into their first post in a Welsh school are knowledgeable about and equipped to teach the National Literacy and Numeracy Framework.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This is key to continuing to make progress with improving key skills.

1:18 option – Embed an open culture in classrooms in Wales, encouraging open and collaborative learning between staff.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

It is important that we continue to show practical commitment to securing an open culture in classrooms in Wales, encouraging open and collaborative learning between staff. A key milestone would be protocols in support of the principle agreed with Trade Union colleagues.

1:19 option – Improving the teaching of the Welsh language

- System leaders to use assessment data to identify and target those schools with the poorest practice.
- Welsh-medium schools to have full and appropriate training to implement the new National Literacy and Numeracy Framework through being supported by sufficient skilled Welsh-speaking coaches and trainers.
- Welsh-medium schools to work in clusters or federations wherever practical to support each other.
- Lead Practitioners and Lead Practitioner Welsh-medium Schools to be identified as a means of supporting other Welsh-medium, as well as English-medium, schools to work extensively together on professional development programmes that foster generic pedagogical skills and learning across the respective types of school.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

These considerations are supportable and are consistent with local Welsh Education Strategic Planning.

1:20 option – Designate excellent special schools and their best teachers as Lead Practitioner Schools and Lead Practitioners to provide a resource for assisting mainstream schools with meeting the needs of pupils with learning difficulties and behaviour management problems.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

It is appropriate that special schools would be amongst the sources of advice available to managing the needs of pupils with additional learning needs and/or behaviour problems. It is a model that we operate in Flintshire.

1:21 option – Use Lead Practitioner Special Schools to provide outreach services to help mainstream schools manage the needs of pupils with additional learning needs and/or behaviour problems effectively.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

It is appropriate that lead practitioner special schools would be amongst the sources of advice available to managing the needs of pupils with additional learning needs and/or behaviour problems. It is a model that we operate in Flintshire.

Strengthening school leadership (pages 36–52)

2:1 option – Establish leadership development boards, comprised of school leaders, at national and regional level to lead a step-change in the development of school leadership capacity.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

Development of such boards would not, in itself, lead to a step change in the development of school leadership capacity. If they are seen as a programme boards with a clear mandate to deliver a high quality Academi Wales for Education or Virtual Staff College learning from the best of programmes from the National College for School Leadership in England and similar approaches internationally a step change will be secured.

2:2 option – Draw up a leadership development pathway agreed with the national leadership development board.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

See 2:1

2:3 option – Agree with the national leadership development board the framework for a leadership development curriculum – including the outline of a stepping-stone qualification to headship.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

See 2:1

2:4 option – Advertise for and accredit providers nationally to develop and deliver leadership development programmes based on the agreed framework, in partnership with Lead Practitioner Schools.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

This provides unnecessary system fragmentation and inefficiency.

Attention is drawn to the mixed experience over recent years of the role of 'expert providers' in helping schools to raise standards as part of national initiatives. Whilst additional resources have often been welcomed by schools the quality of national initiative contractors and other similar providers has varied. There needs to be a stronger client role undertaken rigorously assessing, monitoring and evaluating their impact on standards and value for money.

2:5 option – Regional leadership development boards to commission their best schools and external organisations to provide training for middle leaders – particularly on the use of data, performance management and coaching.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

The work needs to be undertaken, but again, unnecessary fragmentation and creation of unnecessary structures is suggested. Regional commissioning of provision should be through the school improvement consortium (complimenting provision available in and through individual schools, federations and clusters).

2:6 option – Regional consortia to draw on the best schools inside and outside Wales to provide whole-school improvement programmes to support serving heads.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This is an approach that improving authorities and consortia are routinely undertaking.

2:7 option – Regional consortia to work with Lead Practitioner Schools and other federations and hard clusters to organise leadership placements across schools within the consortia.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

Improving authorities and consortia do organise leadership placements across schools.

2:8 option – Review the National Professional Qualification for Headship (NPQH) application and assessment procedures as the leadership development framework and stepping-stone qualification to headship is put in place.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This would be an appropriate and timely task to be undertaken. Any outcome needs to unblock the bottlenecks in relation to current supply of headteachers particularly in relation to Welsh medium schools.

2:9 option – Allocate a coach to all those working towards their NPQH accreditation.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This would be a very positive development for aspiring headteachers.

2:10 option – Consider introducing a scholarship scheme to help applicants cover the cost of all or part of the training involved in moving from the stepping-stone qualification to headship to full NPQH accreditation.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This is a welcome development to promote access.

2:11 option – Regional leadership development boards to draw up leadership succession plans.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

This would be an appropriate task for school improvement consortia.

2:12 option – Consider turning the national leadership development board, as it becomes established, into a teaching and leadership academy or foundation – independent of government but receiving some grant funding to support its remit.

Agree Yes

Disagree Yes

Please give your reasons for your answer and comments.

Successful models for consideration, contextualisation and development include the Virtual Staff College and the National College of School Leadership in England. A Welsh model for consideration is Academi Wales.

2:13 option – The introduction of improving and outstanding school programmes. They would be led and delivered by the high-performing schools on the approved list. The programmes would complement the Improving Teacher and Outstanding Teacher Programmes.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This needs to be part of an integrated local menu of potential interventions.

2:14 option – Developing an all-Wales programme to support the growth and practice of executive headship.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This should be part of the continuing professional development matrix for the school workforce. It should not be a “separate” programme. Partners need to learn to not develop concepts as separate silos or programmes.

Increasing school partnership (pages 53–74)

3:1 option – Set out clear direction of travel for schools to work together through formal partnerships.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

There is significant potential for more effective spreading of consistent good practice and for increased efficiency through developing more formalised and holistic school partnerships.

3:2 option – Use headteacher retirements and the implementation of twenty-first century school strategies to facilitate an increase in the number of federations.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

These are already situations that often lead local authorities to promote local consideration of school organisational change options.

3:3 option – Use the forthcoming guidance on statutory intervention on schools causing concern to indicate that federation with a high-performing school should, wherever feasible, form the core of a recovery programme.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

This is only one potential intervention and would not be the most appropriate intervention in many scenarios. There are a wide range of alternatives that can be the correct intervention. Alternatives range from school closure to change of leadership.

3:4 option – Establish a funding incentive for high-performing schools to assist weak schools.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

It should form a basic expectation within the system that high performing schools and practitioners should offer system leadership. This could be strengthened in statutory guidance.

3:5 option – Review the draft regulations on federations to consider how they might be amended to facilitate the proposed two-tier governance model.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

Current regulations on federations remain too restrictive to promote rapid expansion in forms suitable to diverse communities.

3:6 option – Invite the Welsh Local Government Association to lead the delegation of business and financial management to federations and clusters of schools, based on the Denbighshire County Council model.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

The Welsh Local Government Association should be invited to lead the development of federations and cluster models building on international and local examples of best practice.

3:7 option – Delegate schools' allocation of School Effectiveness Grant, Welsh in Education Grant and Pupil Deprivation Grant to schools that are 'good' or better, without requiring them to supply plans for spending the funding.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This should form part of a grant rationalisation strategy that should reduce bureaucracy at national level. Schools should plan through a single integrated improvement plan. They should be held to account through an evidenced self-evaluation process and ultimately inspection.

3:8 option – Introduce a national template for service level agreements between local authorities and schools.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This would provide a potential efficiency. It would also be an example of identifying and disseminating good practice. As at 3:6, the Welsh Local Government Association should be invited to lead the development.

3:9 option – Amend regulations and legislate as necessary to facilitate a broader range of organisational models for hard clusters of schools, based on the Co-operative Trust model.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

Current regulations on federations remain too restrictive to promote rapid expansion in forms suitable to diverse communities. The reasons for being so restrictive in comparison to other successful countries is unclear

The WLGA believes that schools are best organised within the democratic framework provided by local government. The WLGA supports clusters and federations of schools working together within the local framework.

3:10 option – Delegate a higher level of specific grants to schools working through a federation or hard cluster with the expectation that all such funds were paid through federations and hard clusters.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

The report fails to acknowledge that many of the ideas presented are currently being implemented following local agreements on accountability and governance structures. Although articulating potential functions, it fails to clarify roles and responsibilities at local, regional and national levels establish within an overall statutory governance and accountability framework. As a consequence, it is difficult to agree or disagree with the specific options because they raise, in isolation serious questions as to how such arrangements would be monitored, quality assured, and, more importantly, how the governance and accountability could be achieved without legislative change. As a result, concerns regarding the viability, robustness and sustainability of the options presented remain.

We will however, be continuing to refine our local Flintshire model in partnership with Headteacher representatives, the Governors Association and Trade Unions.

3:11 option – Allocate schools capital funding through federation and hard clusters rather than to individual schools.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

See 3:10 above- The report fails to acknowledge that many of the ideas presented are currently being implemented following local agreements on accountability and governance structures. Although articulating potential functions, it fails to clarify roles and responsibilities at local, regional and national levels establish within an overall statutory governance and accountability framework. As a consequence, it is difficult to agree or disagree with the specific options because they raise, in isolation serious questions as to how such arrangements would be monitored, quality assured, and, more importantly, how the governance and accountability could be achieved without legislative change. As a result, concerns regarding the viability, robustness and sustainability of the options presented remain.

We will however, be continuing to refine our local Flintshire model in partnership with Headteacher representatives, the Governors Association and Trade Unions.

3:12 option – Consider giving schools in a federation or hard cluster, particularly where they include a special school, the right to provide education welfare and additional learning needs services.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

This should be a local consideration between schools, federations, hard clusters and the local authority as to when a suitable model and delivery capacity have been established. The alternative would be creation of mini Las competing with neighbouring federations and hard clusters, together with fragmentation of pupil and family support for our most vulnerable children and young people.

We will however, be continuing to refine our local Flintshire model in partnership with Headteacher representatives, the Governors Association and Trade Unions.

3:13 option – Adjust the accountability and inspection system to recognise the added value generated by federations and hard clusters, as well as that generated by individual schools.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

Estyn need to be commissioned to work with stakeholders on a new and appropriate inspection model for federations and hard clusters.

3:14 option – Identify a distinct standard spending assessment block for statutory local authority duties and functions, such as school transport, that cannot sensibly be delegated – separate from a block for schools’ spending – and delegate the vast majority of the schools’ block to schools.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

Good progress has been made by ADEW, WLGA and civil servants on a mechanism to secure this goal.

3:15 option – Work with local authorities to develop greater standardisation of school funding formulae.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

Progress is being made regionally and across the ADEW finance network on aligning school funding formulae, but it is complex to make significant progress without creating unhelpful turbulence between schools.

DfES will need to consider whether, in a time of limited additional resources being available, that it wishes to see significant movement in resources between areas.

The analysis and identification of positive options can helpfully be taken forward under the leadership of the WLGA with technical support from the ADEW finance network.

3:16 option – Commission a detailed study on the potential implications of a national funding formula.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

There is no objection to undertaking a study on the potential implications of a national funding formula. However, experience from elsewhere suggests that development of a national funding formula would be complex.

International research on resource management in education would also suggest that any such change would be most unlikely to have a significant impact on learner outcomes.

It could also prove to be a significant digression from the key focus on improving educational provision and outcomes. Worse, it could also act as a disincentive during development to local investment in educational improvement.

Any resulting formula would be most unlikely to address the many complexities of individual school circumstances

As above, DfES will need to consider whether, in a time of limited additional resources being available, that it wishes to see significant movement in resources between areas.

3:17 option – The clustering should be sufficiently flexible to allow for schools that shared key values or characteristics to be part of the same grouping. So faith schools should be able to partner with other same-faith schools and Welsh-medium schools with other Welsh-medium schools – though the new model of governance described below would help to protect the distinctive identity of a school where it was part of a mixed federation or cluster.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This matches longstanding local practice.

3:18 option – The majority, and potentially all, schools in Wales to move to being part of a formal federation or hard cluster that is led by an executive leader. (Please comment on the potential models outlined in Figures 4.6, 4.7 and 4.8.)

Agree Yes

Disagree

Please give your reasons for your answer and comments.

The majority and potentially all schools in Wales should move to being part of a formal federation or hard cluster. In Flintshire we are deepening established formal clusters through working with them to expand their range of responsibilities.

However, WG should learn from the experience of previous Welsh regulations on federation. The learning should be that being overly restrictive acts as a barrier to rapid expansion of a desirable concept. The models in figures 4.6, 4.7 and 4.8 (and the additional ones that follow) provide particular strengths in different operational contexts.

David Hargreaves' respected research notes the importance of flexibility of structures in deepening partnership working. Governance has to be robust enough to encompass the growing scale and depth of collaborative effort and to ensure that there is clarity over responsibilities. Local input to developing the federation or cluster governance model also promotes ownership and a "guarantee" that it is fit for purpose.

Improving accountability (pages 75–90)

4:1 option – Link the proposed all-Wales system for tracking pupils from Years 2 to 9 to the National Reading and Numeracy Tests to provide an overall assessment of a child's progress.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This approach is consistent with developing greater transparency and accountability across the education system.

4:2 option – Introduce a bank of standardised tasks (not tests) at the end of Key Stages 2 and 3 to help teachers assess pupil progress in writing (including proficiency in spelling, punctuation and grammar) and oracy more consistently.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This approach is consistent with developing greater consistency, transparency and accountability across the education system.

4:3 option – Continue with school banding but discuss with secondary school leaders their concerns about its detailed operation in order to build greater consensus and ownership.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

School banding has had an impact. However, greater progress going forwards can be achieved through building consensus and ownership of school performance profiles. This would fit with simplification and consolidation of the various data sets so that schools, local authorities, regional consortia, Estyn and the Welsh Government all use the same data sets and work to and interpret data in the same way.

4:4 option – Simplify and consolidate the various data sets so that schools, local authorities, regional consortia and Estyn all use the same data sets and work to and interpret data in the same way.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

See 4:3 promoting the development of simple and transparent school profiles.

4:5 option – Assess the performance of post-16 students in all settings using standardised completion, attainment, and success and destination data.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This approach is consistent with developing greater transparency and accountability across the education system.

4:6 option – Inspect schools on a more proportionate and less predictable basis and reduce the notice for inspection to two or three working days.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This is already developing as a model as notice periods reduce.

Inspection timings should not be predictable, but inspections themselves should act as quality assurance of the rigour of ongoing school self-evaluation processes.

4:7 option – Publish procedures to ensure that heads and governors can address in a timely way the capability of staff and headteachers that have had the opportunity and support to improve, but whose performance remains inadequate.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

There is evidence that Authorities are increasingly collaborating in the review of key education workforce HR policies and procedures in the absence of adequate national models.

4:8 option – Provide a standard school performance data template for governors.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

In terms of efficiency, simplicity and transparency this needs to link to 4:3 and 4:4.

4:9 option – Introduce an annual balanced school report card that summarises for every primary school their performance and progress.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

See 4:3, 4:4 and 4:8- this should be a transparent and “owned” school profile.

4:10 option – Use the planned changes to the GCSE and vocational qualifications system that are being introduced from September 2015 onwards as the basis for considering a move to a balanced scorecard for secondary schools.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

See 4:3, 4:4 and 4:8- this should be a transparent and “owned” school profile.

4:11 option – Review the operation of the inspection model to ensure that it is appropriate for schools working as part of federations, a trust or other hard clusters.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

See 3:13- Estyn need to be commissioned to work with stakeholders on a new and appropriate inspection model for federations and hard clusters.

4:12 option – Provide a separate inspection assessment of post-16 provision in schools linked to the use of common performance data.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

School inspections should be integrated and follow a common inspection framework.

4:13 option – Carry out a fundamental review of the inspection criteria for local authorities to reflect the transfer of school improvement functions to regional consortia.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

Estyn need to complete work with stakeholders on a new and appropriate inspection model for local authorities and consortia. The framework needs to assess how each element of the education system is working to secure coherent services and positive outcomes for children, young people, parents, carers and school communities.

4:14 option – Monitor the impact of the new governor training arrangements.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

System changes do need to be monitored and evaluated to ensure that they have delivered positive outcomes and improvements, but also for learning to influence future strategy.

Monitoring should be done on a national as well as local level. However, given that training is to be introduced on the responsibilities of governors, this raises a fundamental concern given that the outcomes of the Matthias task and finish group are not yet known. This review may yet lead to a significant change in the size of core governor responsibilities.

There is also evidence that many governing bodies do not routinely self-evaluate. They are sometimes not aware of the skills and experience that exist, or of the training needed for their role or of its impact if accessed. This is particularly acute amongst schools causing concern.

There are also capacity issues in securing training delivery. This requires a more collaborative approach than has often been the case previously. Successful existing practice in Flintshire has been to offer training in partnership with Governors Wales and neighbouring Authorities. This approach has recently been extended to commissioning training through our local FE partners.

4:15 option – Enable outstanding chairs of governors to act as Lead Practitioners and so support improvements in governance at other schools.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This reflects current Flintshire practice which has resulted in a proven impact on governance in schools causing concern. However, we do need to be mindful of the voluntary nature of the role and of capacity issues.

Evidence suggests where there is an effective and knowledgeable Chair and Clerk then a governing body is more likely to be effective 'as a whole'. This is evidenced through Governing Body Quality Mark awards which assess a Governing Body's ability to meet statutory processes.

There is also potential for adoption of a similar strategy for 'outstanding' Clerks to Governors to act as Lead Practitioners.

4:16 option – Work with CBI Wales and other employers to develop a register of aspiring and serving business leaders willing to serve as school governors in each region.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

Working with CBI and other business, public and third sector employers to seek volunteer governors with key skills is positive. This is existing practice in many areas. However, it is a significant administrative task to maintain and update lists.

Any resources would be better spent on attracting potential volunteers with key skills from CBI Wales and others, and linking volunteers to local governor support officers.

4:17 option – Adopt the key recommendations from the ACER report on strengthening standardisation and moderation practice to ensure consistency of approach across schools.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

The strengthening of standardisation and moderation practice to ensure consistency of approach across schools is an ongoing goal and programme of work. Reaching consistency is a significant challenge.

4:18 option – The School Standards and Delivery Unit to oversee the sampling of 5 per cent of schools nationally in order to ensure a consistency of standards in which the whole school system in Wales could have confidence.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This is a reasonable task to commission the School Standards and Delivery Unit to undertake.

4:19 option – The My Local School website presents an opportune moment to review and abolish the need for schools to have to send out to parents/carers a secondary school summary report.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

We agree. This is a great opportunity to integrate school profile information with a positive mechanism for information sharing with parents and carers.

4:20 option – With the proposed growth of federations and hard clusters, consideration should be given to reporting the performance of federations and trusts alongside that of individual schools.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This approach is consistent with developing greater transparency and accountability across the education system.

4:21 option – Locate specialist human resource advice either in clusters of schools and/or in regional consortia to support leaders and governors in discharging their obligations as employers.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This has the potential to concentrate specialist advice and experience. However, it also brings with it the risk of reducing resilience and scale of service. As at 3:6, the Welsh Local Government Association should be invited to lead the development.

4:22 option – The Welsh Government should publish clear guidance on the developmental value and practice of classroom observation and affirm the role of headteachers in being able to ‘pop in’ and monitor classroom practice.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

See also 1:18- it is important that we continue to show practical commitment to securing an open culture in classrooms in Wales, encouraging open and collaborative learning between staff. A key milestone would be protocols in support of the principle agreed with Trade Union colleagues.

4:23 option – Incorporate within inspections an assessment of how effectively a school is using the Pupil Deprivation Grant, having regard to the evidence on its progress in closing gaps in attainment.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

See also 1:16- it is appropriate that the inspectorate assess school strategies' impact on closing the gap in attainment.

There is a separate piece of work that should be undertaken to streamline the present regime for planning and accountability for specific grants. The key mechanisms should be the school's integrated improvement planning and self-evaluation processes and documents.

4:24 option – Develop with regional consortia a template of what an effective governance support service should include.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

This would contribute to securing more consistent application of good practice across the whole education system. Flintshire and North East Wales has many examples of effective governance practice to share.

Organising school improvement functions (pages 91–113)

5:1 option – Cut the number of local authority education services by one-third by April 2014, either by voluntary mergers or by the Minister for Education and Skills using his powers to intervene following unsatisfactory Estyn inspections.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

Structural reform is a solution in unison with other solutions explored in this response and is not a solution in itself. Past restructures of local government and health have been disruptive, costly and partially successful: a measured approach is needed with careful planning and transition. A number of Welsh Councils such as Flintshire can be of a sustainable size with possible boundary growth, clarity of the functions they should manage direct (local) and commission (regional/sub-regional) with a longer-term funding plan with relative certainty of national funding. A partial re-organisation is a preferable solution with councils of a sustainable size (with or without boundary growth) who are well governed and with good performance prospects being the foundation for a revised restructure following the outcomes of the Williams review. Reform could be in phases and in geographical phases.

'Localism' can become a 'throw-away' term: local government needs to be of a scale and function where it is connected and draws its legitimacy from local communities and people. Large scale councils would become disconnected. European models embody localism. Recent history of organisations such as Betsi Cadwalader University Health Board illustrate the risks of 'broken connectivity' and remote decision-making.

The Hill report notes that 'vigorous action on mergers could see the number of education services cut by at least a third by April 2014'. At best, this form of debate on structures would distract from the key role being pursued by Local Authorities, namely raising standards and improving performance. It would also fragment the support for learners and school communities in localities. At worst, this approach would take Wales in the opposite direction to research on successful school improvement practice internationally.

Instead, voluntary restructuring action or ministerial intervention should specifically take place where local authorities (small or large) do not have the capacity, strategy and systems to secure high quality ambitious service provision and outcomes on behalf of local learners and communities.

5:2 option – Local authorities to stop providing school improvement services.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

As presently described in the Hill Review the currently proposed options will create increased confusion over responsibility for securing high quality learning opportunities and outcomes on behalf of local communities. The risk

is creation of a dangerous vacuum between schools and government and between both and local consumers of education and communities.

As presently described, the options under 5:1 to 5:6 are at variance to the best in international research on improving education systems. The well regarded McKinsey Report argues that ‘the best school systems seemed to have relied increasingly on a Middle Tier’ as key to delivering local impact from School Reform programmes. The McKinsey Report shows it to be a fundamental feature of each of the 20 most improved education systems across the world. The report recognised the importance of local relationships, networks and connectivity alongside skills and experience in delivering improving outcomes.

International school improvement expert Michael Fullan draws particularly on his work over many years with the Canadian province of Ontario, which performs very well by international standards. It was ranked fifth in the 2009 PISA assessment and rated by the Mckinsey Report as being a ‘Great’ education system. Fullan also reviewed extensively the US progress in school improvement. He argues that significant improvement occurs when ‘school culture, district culture and government culture align.’ The Middle Tier is key to making that happen.

The McKinsey Report identifies three key roles: to provide targeted hands on support for schools; to act as a communication buffer between the school and central government and to share and integrate improvements across schools. This includes ensuring integration of the different aspects of education challenge and support including organisation, inclusion and regeneration.

It includes using influence, local relationships and powers to maximise the impact of implementation of school improvement priorities –

- to improve teaching and learning, ensure data is available to support the monitoring and identification of good practice;
- to marshal of resources to support reform;
- to ensure effective school leadership development programmes, and to effective two-way communication up and down the system, including the involvement of parents and the wider community.

Flintshire’s local improvement journey matches the McKinsey Report conclusions. Our hard won improvement is based on the home team being highly skilled, experienced and having both effective local networks and relationships with individual schools. They are able to effectively marshal support from regional and local service providers (including the regional school improvement service). Their work is determined by high quality “hard” performance data and the “soft” intelligence available from understanding of the views of parents and the wider community.

Councillors through their strategic role have provided considerable community leadership and direction to the school performance improvement journey in Flintshire. Many have been engaged through seminars workshops and the highly effective school performance monitoring group overseeing effective interventions in schools causing concern.

Given that we need a much more engaging and cost effective approach to Whole System Reform, we can advocate ten research backed roles for the integrated Welsh Middle Tier of Local Authorities working with schools and supporting school improvement consortia in ensuring an effective Whole School System approach.

- To provide focus for delivery on an agreed small number of key priorities for schools to be followed through relentlessly, which are drawn from evidence.
- To intervene in the small number of schools which do not have the capacity to improve.
- To provide an improvement framework for schools agreed by stakeholders nationally – a common language drawn from international best practice, to help them to develop their own outcome-focussed reform in a way which engages all staff and students and promotes communication with other schools in the cluster or federation.
- To ensure that all schools are part of strongly led, professional school-to-school support networks, incorporating leading schools.
- To provide a choice of proven strategies to respond to identified priorities and run events to promote school-to-school learning and peer-to-peer challenges.
- To work with schools and other stakeholders on building a much needed Academi Wales for Education delivering a programme for developing school leaders and the wider school workforce.
- To reduce to a minimum the number of distracters in the system, to help schools create the capacity to focus on improvement. This requires removing silos and integrating services that support individual learners, their families and carers and schools. It also requires building local coherence from sometimes disparate national initiatives and contractors.
- To ensure schools have the data they need to monitor performance and support teaching and learning.
- To facilitate partnerships and operational links with local stakeholders and agencies, which prefer to deal with one body rather than an increasing number.
- To enhance communication between schools and central government.

5:3 option – Fund regional consortia directly by top-slicing Revenue Support Grant subject to:

- all consortia covering a standard set of key functions
- consortia obtaining Ministerial consent for their organisational structures, annual business plans, outcome targets and appointment of their director
- consortia governance being vested in a board of local authority leaders, a Ministerial appointee, an education improvement expert and three headteachers (one primary, one secondary and one special school)
- attending a twice-yearly stocktake with the Minister for Education and Skills
- moving as quickly as practicable to a core staffing model, supplemented by buying in a range of school improvement expertise.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

We support the principle that decision making and funding should be focused as near to the point of delivery as possible and that Councils, as locally democratically elected bodies, should have the freedom to allocate resources in a manner than meets the needs of their local communities.

The need for a consistent approach to joint school improvement services both within and between consortia is accepted and supported, and the WLGA and local government are keen to work with the Welsh Government to shape this approach and secure this end.

Whilst supportive of the development of consistency of application of good practice and systems across consortia, we understand from the WG that there are legal and practical barriers to top-slicing the Revenue Support Grant. We recommend engagement with Local Government Finance representatives on developing the funding methodology for school improvement consortia.

Where local authorities have collaborated to set up companies limited by guarantee to provide services for them, they are bound by certain legal restraints. In order to avoid the need to go out to tender for these services, including school improvement, certain conditions need to be met. The local authorities who own the company must have a control over that company in the same way that they would have over a department in the local authority. This includes setting outcomes, plans and budgets and also appointing directors or chief officers. Without this control authorities will have to go out to tender for the service in order to meet EU procurement law. This means that it is not possible for another organisation to have control over the plans and budgets of a local authority owned company providing school improvement services.

5:4 option – Use reserve powers to bring in other providers where consortia fail to deliver.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

This should be as a last resort to safeguard the interests of local learners and communities. However, it is not clear which powers could be used in these circumstances other than those which exist to remove powers or intervene in local authorities.

Local Authorities, given their commissioning role and statutory role on school improvement should effectively intervene at the appropriate stage if consortia are not meeting local school improvement needs.

5:5 option – Establish written protocols between regional consortia and local authorities regarding intervention in schools causing concern.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

As at present in improving authorities such as Flintshire it is important that use of powers and interventions in schools causing concern are underpinned by clearly communicated and understood “ground rules” or protocols.

The obvious approach to this is a specification that outlines that the statutory power of intervention sits with the local authority, which takes advice from the joint school improvement service with regards to appropriate intervention in schools causing concern. School partnership agreements in Flintshire match this model.

5:6 option – Include education in new slim-line elected local authorities that:

- reflect Wales’ city regions and economic sub-regions to support how an authority’s education vision linked to a region’s skills, enterprise and employment agenda
- integrate key public services and functions and operate on a coterminous basis to reduce duplication and maximise synergies between functions
- reflect the new slimmed-down commissioning role of local authorities and focus on supporting the development of a self-sustaining school-led improvement system
- locate political responsibility for education with a named elected member, supported by a named education lead officer.

Agree

Disagree Yes

Please give your reasons for your answer and comments.

The primary responsibility of good governance and performance remains with the accountable body: in an over governed Wales with at times excessive regulation, local roles and responsibilities can be diluted and for those who are not able or willing to take personal and collective accountability there are ‘comfort zones’ to stay within. Streamlining and greater emphasis on clear performance expectations are part of the solution.

Regional mapping provides a clear and workable partnership and governance backcloth: the concept of co-terminosity is supported for strategic planning and service planning and commissioning for those functions which could appropriately be delivered regionally on a larger scale.

These are themes that must be carefully and holistically developed as part of the wider Public Services review being led by Paul Williams if major disruption to public service is to be avoided. Meanwhile, Flintshire continues to:

- work with partners to deliver innovative and positively evaluated approaches to meeting sub-regional skills, enterprise and employment goals.
- integrate key public services and functions to reduce duplication and maximise synergies between functions.
- focus on supporting the development of a self-sustaining school-led improvement system.
- locate political responsibility for education with a named elected member, supported by a named education lead officer.

It is appropriate that Authorities with the scale, resilience and capacity (working with partners) to secure continuing improvement in outcomes for learners should set the pace for others within the system. Where outcomes are lower (whether in small or large authorities) alternative strategies for delivery of key functions can appropriately be considered and justified.

5:7 option – Consider relatively minor consortia boundary changes to secure greater coherence with the footprint of how other public services in Wales are organised.

Agree Yes

Disagree

Please give your reasons for your answer and comments.

The current consortia are local authority collaborative arrangements. There is flexibility for authorities to work in different partnership arrangements according to local need. This is an appropriate local consideration with consortia where changes may promote more service coherence and efficiency. The advantages need to be considered against any disruption to current delivery.

5:8 option – Strengthen the School Standards and Delivery Unit so that it has sufficient expertise to:

- contribute to leading-edge teaching and learning practice and leadership of school improvement
- support and challenge the plans and work of consortia in preparation for the proposed twice-yearly stocktakes
- act as an expert link into education policy making within the Welsh Government.

Agree

Yes

Disagree

Please give your reasons for your answer and comments.

The present School Standards and Delivery Unit has been designed to fulfil core functions of:

- contributing to leading-edge teaching and learning practice and leadership of school improvement
- supporting and challenging the plans and work of consortia in regular stocktakes
- acting as an expert link into education policy making within the Welsh Government.

It has proved that it has a clear focus, moral purpose and capacity to deliver these core tasks well in its current configuration.

However, the unit does need to consider the implications for improving learner outcomes from the presence of too many and at times competing national policy objectives and expectations. There is a clear need for a streamlined set of social policy objectives with clear outcomes, roles, investment needs and staged performance improvements. There is also a clear need for a review of priorities matched by realism over resources with a mature approach to the governmental role of managing scarcity.

A further critique is that Welsh Government micromanagement of all parts of the system is counterproductive as dissipates scarce resources for necessary targeted interventions. Stifling freedom and creativity to achieve will stifle medium and long term performance improvement. Solutions include social policy base national-regional-local agreements with freedoms such as risk taking innovation and financial flexibility where authorities are improving.

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

This response is based on the context in which education is organised and delivered in Flintshire. Overall, there is much to support in chapters 2, 3 and 5 of the report in relation to classroom practice, the role of leadership and management of schools and developing school accountability. Many of the elements identified are currently in operation at consortium or individual authority level. There are also ideas in chapter 4 that also deserve further careful consideration and development.

The response is also based on awareness of challenges across public services. There are two major shared challenges over performance (1) disparity in performance from good to poor across Wales and (2) overall collective performance as a country, notwithstanding disparities, compared to peer nations.

Generalising and often negative positions are sometimes taken on performance with the lowest common denominator becoming the benchmark for policy-making and interventionist solutions on education standards. This

centralist negative view of local government is counter-productive: organisations which are well governed and showing positive trends in performance should be given freedoms rather than be 'herded' with the 'failing' section of their peer group. Under-performing organisations should rightly attract scrutiny and intervention. The concept of 'earned autonomy' remains a concept only.

Flintshire County Council is committed to working with schools and its partners to secure continuing improvement in learning opportunities and outcomes. Flintshire's commitment to educational improvement is shown through the design and delivery of its corporate governance, leadership, strategy and performance planning/ improvement functions.

Overall, outcomes in Flintshire are positive and improving. This year has seen Flintshire secure:

- record outcomes on key indicators at GCSE and A level;
- further improvement in Key Stage 3 teacher assessments;
- significant improvement in Foundation Phase and Key Stage 2 teacher assessments meeting improvement priorities;
- high pupil attendance and low exclusions in comparison to other authorities;
- no schools in Estyn intervention categories; and.
- the lowest rate in Wales for the first time of 16+ young people not in education, employment or training.

Our progress is based on a clear commitment and a moral purpose which is based on working collaboratively to deliver improvement. It involves planning and accountability at all levels to personalise each learner's teaching and learning, to monitor progress and to evaluate how further improvement can take place.

Flintshire is ambitious on behalf of learners and communities to secure further continuous improvement. It benefits from maturing learning networks engaging senior and middle school leaders as well as governors, It has mature systems of accountability that have proven the difference that they can make. Flintshire is also clear about the service that it has commissioned from the regional school improvement consortium and holds it to account for the outcomes it achieves.

Whilst being positive about collaborating with partners to secure further improvement and supportive of organisational change where it will contribute to improving learner outcomes, we are concerned that simplistic and undifferentiated approaches to structures will threaten established patterns of improvement.

Across Wales we need to ensure that the local educational offer in every community is of high quality and secures successful outcomes for learners. This requires a local integrated approach to intervening in schools failing to deliver such positive outcomes. It also requires the local educational system to be integrated and not separating some of the key interlinked levers for improvement such as school improvement, inclusion practice and school organisation/ modernisation.

We need to move away from top-down strategies, except where there is consistent school failure and lack of capacity to drive change in favour of a model that links self-review, external review and school improvement to empower school leaders, their staff and communities to take charge of their school improvement journey. The effective engagement of teachers is particularly important. Marc Tucker, who led the PISA study assessment of US school improvement, was highly critical of the reliance on top-down strategies and identified the failure to fully engage teachers as the single most significant weakness in US education. Douglas Reeves' US-based research supports this view in demonstrating that 'deep implementation', or the embedding practice in a school, requires 90% of the teachers to be engaged.

Given that we need a much more engaging and cost effective approach to Whole System Reform, we can advocate some key research backed roles for the integrated Welsh Middle Tier of Local Authorities working with schools and supporting school improvement consortia in ensuring an effective Whole School System approach:

- To provide focus for delivery on an agreed small number of key priorities for schools to be followed through relentlessly, which are drawn from evidence.
- To intervene in the small number of schools which do not have the capacity to improve.
- To provide an improvement framework for schools agreed by stakeholders nationally – a common language drawn from international best practice, to help them to develop their own outcome-focussed reform in a way which engages all staff and students and promotes communication with other schools in the cluster or federation.
- To ensure that all schools are part of strongly led, professional school-to-school networks, incorporating leading schools.
- To provide a choice of proven strategies to respond to identified priorities and run events to promote school-to-school learning and peer-to-peer challenges.
- To work with schools and other stakeholders on building a much needed Academi Wales for Education delivering a programme for developing school leaders and the wider school workforce. In line with the best Education Systems internationally Middle Tier and school leaders should systematically study together so they develop a shared understanding of what works best.
- To reduce to a minimum the number of distracters in the system, to help schools create the capacity to focus on improvement. This requires removing silos and integrating services that support individual learners, their families and carers and schools. It also requires building local coherence from sometimes disparate national initiatives and contractors.
- To ensure schools have the data they need to monitor performance and support teaching and learning.
- To facilitate partnerships and operational links with local stakeholders and agencies, which prefer to deal with one body rather than an increasing number.
- To enhance communication between schools and central government.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

