

To:

Children, Young People and Education Committee

The National Assembly for Wales, Senedd, Cardiff

Inquiry into Education Improvement Grant: Gypsy, Roma and Traveller, and Minority Ethnic Children

December 12th 2016

Dear CYPE Committee members,

Thank you for the opportunity to submit oral evidence to your inquiry on November 30th.

I feel very strongly that some of the evidence and answers to questions you have received during this inquiry have the potential to be misleading. I would welcome the opportunity to address many of the individual points made by particular witnesses and in the Cabinet Secretary's response but, in the meantime, I have put together a number of pieces of additional information which I hope will give you more insight into the reality of what is happening. **I appeal to you to see through the smoke of vested interests, alternative agendas and self-protection** that might be influencing some of the evidence and answers given, to the needs of CYP and their families.

I understand that the Inquiry's focus was on the EIG but the cuts to MEAG were part of a progressive trend in which the funding levels did not keep up with increases in pupil numbers and needs, even during years when the total fund was increased. **It is really important to consider the EIG changes in the wider context of what had happened before** and in the eighteen months prior to the introduction of the EIG. Some of your witnesses suggested that there has been little or no apparent impact on spend, staffing or provision in these areas since going into the EIG. This may be because the severest cuts were made during the previous eighteen months, so the amount of MEAG at the time of going into the EIG was considerably lower than it had been in 2013/14. This was the result of intentional strategic decisions made by the Welsh Government. Looking at changes *since* the introduction of the EIG, the impact has been much less significant, although projected reductions in the future EIG suggest that further cuts to these areas of provision may be inevitable if the current arrangement remains. (It is worth noting that some authorities appear to have diverted more funding towards maintaining the smaller pot for GRT provision and less to EMA provision.) Without an insightful review of the recent changes, there is absolutely no guarantee that the current 'direction of travel' will improve provision for these groupings of children and young people and, if anything, some of the additional evidence appended herewith points to a progressive deterioration.

I also believe **it is crucially important not to lose sight of the disproportionate impact of reductions on BAME/GRT staff levels since 2013/14**. This is one of the clearest indicators that Equality compliance considerations were inadequate and that, potentially, there has been **indirect discrimination on racial grounds**. If the law may have been broken, action to rectify this must be taken. The EHRC, the Welsh Government, Consortia and Local Authorities have not addressed this with sufficient rigour and we have to ask why that is the case.

A narrow focus on *outcomes* rather than *needs* for targeting interventions for these groupings of learners is extremely concerning. If a pupil arrives from another country with no English or Welsh, their 'academic outcomes' will not become apparent until an end of Key Stage assessment, or perhaps even longer if they are disappplied for two years, as many new arrivals are. This early period is a crucial time for them to receive intensive support and must be based on a *needs* assessment not an *outcomes* assessment. If we wait several years before assessing whether or not schools have done a good job in supporting these learners, it may be too late for them or, at the least, opportunities to enhance their progress through funded interventions and targeted capacity-building may have been missed. For some GRT CYP and early stage EAL/WAL learners, progress and the achievement of individual targets are more significant than raw academic outcomes.

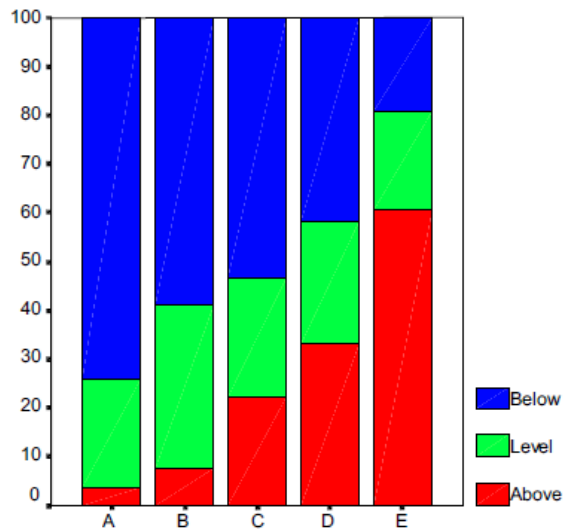
I was especially concerned at the evidence provided by the Director of Education for Cardiff and the WLGA. **In the context of an inquiry into impacts on provision for minority ethnic, Gypsy Roma and Traveller pupils**, the Director of Education emphasised the smallness of the GRT CYP grouping and the amount of money dedicated to their provision; he asserted that it is "increasingly inappropriate to see a subset of pupils as needing special funding, special treatment, teachers needing special skills" thereby devaluing specialist areas of professional expertise that have been built up over the past 25 years in Wales and revealing a lack of understanding of how the needs of many pupils are best met.

Instead, **he used the opportunity to highlight the needs of "White UK pupils, notably FSM boys"** as "a subgroup of pupils who are not making the progress they need to make". He contrasted this with the good progress of 'many minority ethnic pupils' but said only that "we can speculate about the reasons for that". FSM pupils (of which White UK pupils make up the vast majority) have had the PDG specifically 'earmarked' for raising their attainment since 2012/13. Between 2013/14 and 2015/16, as the MEAG was reduced and then merged into the EIG with the GRT Grant, the PDG was substantially increased. (In fact, prior to 2015/16, the PDG was not permitted to be used to support minority ethnic and GRT learners unless they were LAC or FSM, nor to tackle underachievement across the school, for example for EAL/WAL learners who were not FSM. See page 3 of <http://dera.ioe.ac.uk/19051/1/131216-pdg-short-guidance-for-practitioners-en.pdf>.)

White UK FSM pupils, notably boys, are not being overlooked and have, rather, dominated headlines and research studies on underattainment for several years now, so I think it needs to be asked why the director should deflect attention onto them in this Inquiry examining the needs of ethnic minorities.

There is no need to speculate why minority ethnic pupils, taken together as a whole grouping, make good progress between Foundation Phase and Key Stage 4. Research and data (e.g. Figure 20 below from EALAW/WAG, 2003: 16) have clearly identified that the proportion of minority ethnic pupils who are EAL/WAL learners make considerable 'value-added' progress over time as they develop greater proficiency in English/Welsh (from Stage A to E), leading to increases within particular ethnicities and to all ethnic minorities grouped together. It therefore makes sense to direct resources to enhance and hasten their EAL/WAL development as much as possible. This is a skilled and specialist area, in which all teachers need improvement and which best functions in partnership with trained, qualified specialist practitioners who have developed their expertise by working with individual learners.

Figure 20. EAL Stage and achievement of pupils above, on and below the expected level for their year group.



Many minority ethnic pupils who make good progress are very intelligent young people from well-educated, supportive, literate families with parents who are not in jobs commensurate with their qualifications and skill levels, leaving them on lower incomes. Their children succeed in school in part because of the supportive familial factors, but their route to success is not often easy and that ‘process’ should not be ignored by focusing simply on end result ‘outcomes’.

The Director’s assumption that ‘rebalancing’ central and school-based staffing with significantly greater delegation is the best way to promote better outcomes for these groupings of learners is questionable in the light of evidence included in the separate file ‘Learning Lessons from England and Cardiff’. Whilst I agree with his statements that: “anyone who’s teaching in a school or leading a school needs to understand how to work with diversity, be positive about diversity” and that we need Challenge Advisers who “are extremely well-briefed and professionally well-versed in what good practice looks like in working in a context of diversity”, I would challenge his assertions that “there is a danger in looking at the notion that we deal with the issues about approaching the achievement of one subset of pupils separate from looking at how we build a strong education system more broadly” and that “central retention by a specialist service is not the right way to address what I think is a more complex situation.”

It is not about ‘either/or’ but ‘both/and’. It simply requires particular pupil groupings and issues of need to be clearly identified, adequately funded and explicitly targeted within a stranded approach to building a strong education system – a genuinely inclusive system for a diverse population – where all partners take ownership and responsibility. I do not believe this will be achieved by generalising approaches to ‘all learners’, decreasing levels of dedicated funding, removing ring-fencing, reducing specialist staffing, shifting the focus from early assessment of needs to examining long-term outcomes, lessening accountability, removing central oversight and diminishing the flexibility of services to respond to ever-changing demographics. Devolution of money and decision-making to school leaders, many of whom lack in-depth understanding of these areas and have not given them priority attention in the past, is no guaranteed way to improve the capacity of schools or effectively meet the needs of individual learners, **especially if those school leaders are being asked**

to make choices between spending money on minority ethnic, Gypsy Roma and Traveller children or on White UK FSM pupils or the Foundation Phase.

The fields being examined in this Inquiry have been consistently underfunded, undervalued, underprioritised and underskilled for many years. In the current public climate of hostility towards minorities, now is not the time to further undermine them but rather to configure the way the new curriculum and the drives to raise Wales' attainment are moving, so they are explicitly inclusive and overtly supportive of best practices for these groupings of learners, as well as all others.

The papers accompanying this letter examine some arguments in a more substantive way, with personal accounts, data, and some suggestions as to ways forward. They include:

Learning Lessons from England and Cardiff

- evidence from England about the consequences for provision in the areas of minority ethnic achievement (MEA) and EAL following the abolition of EMAG in 2010, with subsequent delegation to schools, incorporating the findings of a 2012 NASUWT report, and personal accounts from professionals working in England;
- anonymised personal accounts about the impact of greater delegation of funding for MEA to schools in Cardiff, noting the sense of devaluation and fear that some staff members still feel;
- a description of Cardiff's position in local authority rankings derived from a comparison of attainment figures by ethnicity for each local authority, aggregated from 2009-2014.

Poverty, Ethnicity and the Pupil Deprivation Grant

- a critique of the approach to analysing data gaps by poverty and ethnicity, which is highly relevant in the light of the Welsh Government's assertion that the PDG will 'disproportionately' benefit pupils from some minority ethnicities, and comments made about White UK FSM pupils during the Inquiry. The critique raises questions about the 'narrowing the gap' approach.

Education for the Diverse People of Wales

- the Introduction and Executive Summary of a report written for the Education Minister's Advisory Group and education policy board in 2010, accounting for the work of the Ethnic and Cultural Diversity in Education subgroup (the ECD group), which I chaired from 2007-2009. The report highlights a number of issues about inclusive policy-making, mainstreaming and explicitly addressing needs in a new way within Welsh Government strategy. You will notice that many of the observations and recommendations chime with aspects of the broad direction that the Welsh Government has taken since that time but the report has a much more robust focus on Equality and on explicitly identifying strands of need and groupings of learners. The ECD group utilised a ground-up network to link with WG officials and identify specific action points for WG branches to integrate diversity matters into their workplans but it was not permitted to complete its work in 2010 and, as a result, the progress made and thousands of pounds of tax-payers' money were wasted. Had it been allowed to continue its work, it is my opinion that we would not have found ourselves in the current situation which is the topic of your Inquiry.

Recommendations from the 2003 EALAW Report on Ethnic Minority Achievement in Wales

- the set of recommendations of this study from pages x-xii and those from Section 1 page 9, illustrating points that were being made 13 years ago, many of which were not addressed for several years and some not at all. Several are pertinent to your current Inquiry. The reason for

including these is to illustrate the frustration that many professionals in this field have felt about marginalisation. The issues and needs have been clear for years but the dominant agendas of mainstream education have not fully incorporated them within their priorities and strategies, thereby holding back progress in these fields of work. The key point is that the recommended actions are needed in addition to – not instead of – the specialist provision being offered.

Suggested Recommendations

- a set of suggested recommendations for a way forward in your review. Having considered very carefully the various pieces of information presented by the witnesses, and the evidence I have discovered myself through FOI, I have made a set of recommendations about how an approach focused on 'needs', 'process' and 'outcomes' might resolve some of the current concerns and improve provision in Wales for Gypsy, Roma and Traveller, and Minority Ethnic children and young people in Wales. The recommendations cover Strategy, Funding, Training, Organisation of Provision and Targeting, Training and Capacity-Building and Equality Compliance.

I hope you find these additional pieces of information helpful.

Yours sincerely

Jonathan Brentnall

EDUCATION FOR THE DIVERSE PEOPLE OF WALES

Draft report of the work of the DCELLS Ethnic and Cultural Diversity sub-group 2007-2009 Primary Focus on Children and Young People in Schools

Prepared by Jonathan Brentnall
Chair Ethnic and Cultural Diversity sub-group
May 2010 (first draft presented to MAG)
January 2011 (final consultation draft)

Executive Summary

i. Introduction

This report describes the work of the Ethnic and Cultural Diversity sub-group (ECD group) of the MAG Additional Learning Needs and Inclusion (ALNI) Panel, between 2007 and 2009, when it ceased with the demise of the ALNI Panel.

The ECD group was set up to provide advice to the ALNI Panel on:

- issues arising from the ethnic, cultural, linguistic, faith and belief diversity of Wales which impact on provision of Education, Lifelong Learning and Skills;
- provision and support for those of minority ethnic backgrounds where their needs are significantly different in nature or extent from those of the majority population, or where current mainstream provision is not adequately meeting needs;
- equality of educational opportunity, access and attainment.

Section 1, *Introduction*, provides background information on the ECD group and makes reference to the wider social and economic situation which impacts on diversity and education in Wales.

Section 2, *Diversity and Equality in Schools - What the figures say*, contains an analysis of available education data by ethnicity and other pupil characteristics to identify any differentials or inequalities between groupings. Some of the data are presented in charts and tables in Appendix 4 at the end of the report.

Section 3, *Work carried out by the ECD group and its network*, contains a summary of the main work of the ECD group and its consultative network. The network of external experts and practitioners provided extremely valuable insights into situations at grassroots level and highlighted many issues of importance which were discussed in depth and were then developed towards a set of Action Points. Examples are provided. This section also describes a number of recurrent themes that emerged during discussions which shed light on why the needs of people from all sections of Wales' population are not being adequately addressed in policy and provision.

Section 4, *Ideology and Identity: key areas of concern*, contains a discussion, written by the ECD group chair, of some of the salient points concerning the way in which the diversity of Wales' population is conceptualised and categorised; the potential for different interpretations of Wales' heritage, traditions, cultures and languages; and the tension between supporting a common national identity, distinctive group identities and the right to an individual identity.

ii. Key points from data

1. 92% of the school population in Wales is recorded as being of White British ethnicity. The other 8% is divided between over 100 different ethnicities.
2. North-west and mid-Wales have the least ethnic diversity with the largest proportions of pupils being of White British/Welsh background. Pupils from ethnic backgrounds other than White British/Welsh attend schools in all 22 local authorities. The largest proportion lives in Cardiff, followed by Newport and Swansea. Smaller percentages, below 5%, attend schools in all other authorities. The ethnic breakdown of each authority also differs.
3. The recorded numbers of pupils in Wales from a range of backgrounds other than White British have progressively increased during the past decade.
4. Pupils in Wales use over 100 different languages and over 140 different dialects between them.
5. No data on pupils' faith backgrounds are currently collected at a national level.
6. There are 22,265 pupils who are known to be learning English as an Additional Language (EAL) in 2010. At least 18,840 of these pupils need targeted support to access the curriculum and develop their language proficiency to guarantee their legal entitlement to a full education. A small proportion of these pupils attend Welsh-medium or Bilingual Welsh-English schools and require support to learn both English and Welsh for curriculum learning.
7. There are substantial differences in attainment figures for pupils grouped by ethnicity. Chinese or Chinese British, Mixed White and Asian, Indian and Any Other Asian groupings have the highest percentages of pupils attaining the expected levels. The gaps between the highest and lowest attaining groupings are considerable and indicate unacceptable inequalities of educational outcome for certain backgrounds, particularly Gypsy/Roma, Traveller of Irish heritage, Black African, Black Caribbean and Mixed White and Black Caribbean.
8. There is considerable variation in the gender attainment gap between ethnic groupings, with Pakistani, Any Other Black, Any Other Mixed, Bangladeshi and Gypsy Roma backgrounds all having substantially greater than average gaps between girls' and boys' attainment at KS4.
9. Free School Meal (FSM) entitlement varies considerably between ethnic groupings. FSM entitlement for Gypsy/Roma, Irish Traveller and Black African heritage pupils is well over three times the national average whilst the Indian, Chinese, Any Other Asian, Any Other White and White British groupings are all below average. Not all groupings show an equally strong correlation between socio-economic background and attainment.
10. Comparison across all Key Stages shows that the attainment gaps by ethnicity are larger than those for FSM entitlement and gender.
11. Exclusion figures for Wales reveal racial inequalities, particularly for pupils of the Black, Mixed and Any Other ethnic groupings, who are more likely to be excluded than pupils from other backgrounds.

12. There is some variation between absence rates analysed by ethnicity, most significantly for Travellers of Irish heritage and Roma/Gypsy backgrounds.
13. A correlation between higher attendance and higher attainment is borne out for several groupings but not for all. For example, Black African, Black Caribbean and Any Other Black groupings have average or above average overall attendance figures but below average attainment.
14. 22% of pupils are recorded as having a Special Educational Need (SEN). The White British grouping is 0.1% above this figure. The figures for Pakistani, Black Caribbean and Mixed White and Black Caribbean heritage pupils are all higher and those for Gypsy/Roma and Traveller of Irish heritage pupils are much higher. All other groupings are below average. Issues of SEN misdiagnosis for pupils learning additional languages may contribute to some underrepresentation.
15. The teaching workforce is not representative of the diversity of the whole population. There is a much higher proportion of White teachers than those of non-White backgrounds.

iii. Key points arising from ECD network consultations

- a. The needs of Wales' diverse population must be addressed across the WAG structure in a more discriminating way, as opposed to locating the primary responsibility for policy development for 'minorities', as distinct from a notional majority, within branches with a restricted policy remit.
- b. Some groupings of pupils have distinct and very pressing needs, which must be addressed directly by adequately funded, targeted provision.
- c. The development of a single stranded Minority Ethnic Achievement Strategy, as originally proposed in the Learning Country, would be both inadequate and inappropriate for addressing all pupils' diverse needs within a coherent, mainstreamed framework.
- d. The needs of pupils from minority ethnic backgrounds would be better addressed together with those of majority ethnic pupils in an inclusive mainstreamed strategic approach which is stranded and differentiated to take full account of pupils' diverse needs and to address the key issues associated with particular pupil characteristics.
- e. Much more effective joint working is needed at all levels from the Welsh Assembly through Local Authorities to schools and communities.
- f. The partnership models advocated in the School Effectiveness Framework must become fully developed in relation to diversity and equality matters to ensure effective provision for all pupils.
- g. Children and Young People's Partnerships need to include representation of people of different backgrounds and/or those with specialist understanding of diversity and equality, in order to ensure that issues are addressed and followed through into frontline provision.
- h. Strong Leadership and a Positive Ethos in education institutions are essential for promoting understanding of diversity and a commitment to equality for learners.

- i. Socio-economic Background, issues of Health & Well-being and Language are amongst the most significant cross-sector and inter-departmental areas needing to be addressed at strategic national and local authority levels to promote greater equality between learners.
- j. Raising Achievement Outcomes, providing Training for all Education Staff, developing Secure Funding and producing best practice Guidance on Pedagogy and Targeted Provision are amongst the highest priorities for education.
- k. The many different issues identified by the ECD group relate to a wide range of policy areas which need to be addressed by different Assembly divisions and branches.
- l. Action Points defined by the ECD group call for a wide range of outputs or changes including: data analysis, research, training, guidance, programme initiatives, mechanisms to promote better communication and joint working. Some require action by the Welsh Assembly, others by Local Authorities, schools, voluntary sector and community organisations and non-governmental agencies.
- m. The 'distance' between policy-makers and the real issues to be addressed by policy and provision needs to be reduced by promoting wide participation, knowledge-sharing and ongoing professional development, including real-world experience of diversity, person-to-person contact and ICT-based networking.
- n. There are weaknesses in the processes of policy development and Equality Impact Assessment which allow issues affecting individuals, groups and communities to be overlooked, particularly those of minority backgrounds.
- o. A coherent strategic overview of education policy and initiatives is sorely needed to improve the quality of public service provision for all citizens in Wales' diverse population.
- p. There is a need to follow through the very positive high level aims and commitments in One Wales, the Single Equality Scheme and Rights to Action to ensure that they are realised in lower level policies, implemented at local authority level and then brought into reality at the level of citizens 'on the ground'.
- q. Messages about linguistic diversity in Wales are not consistent between WAG policies. There is a strong tendency to marginalise languages other than English and Welsh and overlook the cultural, academic and economic potential that exists in the multilingual population.
- r. There is some ambiguity and inconsistency of interpretation, in other policies and initiatives, of the commitments to pluralism and multiculturalism in One Wales. Concerns relate to:
 - the way in which the diversity of Wales' population is conceptualised and categorised;
 - the potential for exclusive interpretations of Wales' heritage, traditions, cultures and languages;
 - the tension between supporting a common national identity, distinctive group identities and the right to an individual identity.
- s. With the demise of the ECD group and its network, the valuable work which was begun remains unfinished. There is no comparable mechanism for WAG policy-

makers to engage with experts and practitioners to benefit from well-informed advice about ethnic, cultural, religious and linguistic diversity on an ongoing basis.

iv. Recommendations

- 1)** Establish a Task and Finish group to identify datasets across DCELLS policy areas which should be routinely analysed by ethnicity and other pupil diversity characteristics in both single and multi-stranded ways; aggregating figures over time, where necessary, to make data more robust and to overcome disclosure restrictions.
- 2)** Commission carefully targeted research into several of the most significant disparities identified in data.
- 3)** Commission a study into the assessment and diagnosis of SEN for pupils who are learning English and Welsh as additional languages.
- 4)** Consider the development of an inclusive, co-ordinated mainstream strategy for raising attainment by addressing the main factors impacting on all pupils' achievement; clearly stranded and differentiated to take account of diversity by targeting specific issues and relevant groupings.
- 5)** Promote initiatives to increase entry into the teaching profession of people from backgrounds which are currently under-represented.
- 6)** Formalise a mechanism with the DCELLS Equality Steering Group to feed issues identified by the ECD group into policy area workplans through the SES.
- 7)** Consider establishing a permanent network of external expertise on diversity and equality (to replace the ECD network) which can act as a consultative forum for WAG policy officials, through direct face-to-face or ICT-based engagement.
- 8)** Establish a means of monitoring the way in which diversity and equality issues are addressed across DCELLS policies, and the forms of language in which they are expressed.
- 9)** Define a role within DCELLS for maintaining a strategic overview of policy and initiatives to coordinate work, avoid duplication and facilitate effective joint-working, with particular attention to diversity and equality issues.
- 10)** Modify the approach to Equality Impact Assessment in the Inclusive Policy Making gateway to ensure that all officials take diversity into account *from the outset* of all policy development. The question 'Who am I writing this policy for?' should be addressed as the starting point of policy design with the standard response being 'The diverse people of Wales'.
- 11)** Establish a working group to define a clear, non-essentialist, critical multiculturalist position to inform the thinking and wording of WAG strategies, policies and practitioner guidance.

CYPE Committee: Learning Lessons from England and Cardiff

Jonathan Brentnall

Introductory Comments

Section 1 – NASUWT report

As mentioned in earlier evidence papers, the abolition of the MEAG and GT Education Grant in Wales follows a similar move in England in 2010. In 2011/12, the NASUWT carried out a survey and produced a report to evaluate the impact of the changes. The Executive Summary is included in Section 1 below. The full report can be found here:

https://www.naldic.org.uk/Resources/NALDIC/Research%20and%20Information/Documents/EMAG_Survey_Report.pdf . It's findings are stark.

Section 2 – Accounts from England

I maintain regular contact with professional colleagues in the field in England and asked some of them (from London, the north and east of England) to comment on the changes there and what impacts they have perceived on provision for ethnic minorities and additional language learners. I have incorporated their comments in Section 2, along with some statistics showing a drop in the percentage of EAL learners and several minority ethnicity groupings attaining the KS4 inclusive target outcome in 2014/15, whilst the figure for English first language and White British majority pupils rose. The overall picture from England is far from positive and begs the question why Wales should choose to follow England's lead.

Section 3 – Local Authority Comparison and Personal Viewpoints on Changes in Cardiff

Of all the Local Authorities in Wales, Cardiff has moved the furthest towards the English model and, in Section 3, I have included some personal accounts of the consequences of delegation to schools in Cardiff. Whilst these viewpoints may not be representative of all practitioners, the picture they present contrasts markedly from that put forward by the Director of Education for Cardiff in your Inquiry about the benefits of delegation. I have also included some findings from an analysis of data aggregated over 5 years from 2009-2014 for Wales, which indicates that Cardiff's outcomes for several minority groupings are amongst the lowest in Wales. For all minority ethnicities taken together they are the lowest of all the authorities in Wales. The data clearly indicate that Cardiff is not leading the way in minority ethnicity outcomes and suggest that much greater investment is needed in funding, staffing, training and capacity-building if improvements are to be made.

SECTION 1

NASUWT (2012) Ethnic Minority Achievement (extracts)

INTRODUCTION

The development of effective provision to support the progress and achievement of black and minority ethnic pupils and those with English as an Additional Language is a hallmark of a genuinely inclusive education system in which all children and young people are given the fullest possible opportunity to make the most of their potential as learners.

Since May 2010, the Coalition Government has pursued a policy of economic austerity in which cuts to public spending have been a key feature.

During that time, there has been a significant increase in feedback from teachers about reductions in the extent of provision of services to support ethnic minority achievement and pupils with English as an Additional Language.

Reports from school leaders, specialist staff working in schools and local authorities, and from classroom teachers of the scaling-back of services have become more frequent and have highlighted a growing range of concerns.

The NASUWT has investigated changes at school and local authority level and has assessed the impact of these on the work of teachers, school leaders and ethnic minority achievement and English as an Additional Language specialist staff, as well as on the educational opportunities made available to the pupils they teach.

This investigation involved:

- desk research;
- a quantitative survey of the experiences and perspectives of school leaders on the impact of changes to ethnic minority achievement and English as an Additional Language policy and practice; and
- qualitative feedback from school leaders and ethnic minority achievement and English as an Additional Language specialist staff on recent trends in provision.

EXECUTIVE SUMMARY

- The evidence emphasises the importance of ensuring that the education system is able to benefit from specialist ethnic minority achievement and English as an Additional Language staff, including qualified teachers, who have access to high-quality and well-resourced professional, career and pay development opportunities, supported by effective processes for the management of their performance.
- Teachers with responsibility for ethnic minority achievement and English as an Additional Language should be deployed in contexts within which they have the time, space and capacity to focus on activities that make the best possible use of their distinctive professional skills and expertise.
- Securing good-quality provision depends on the establishment of mechanisms that seek to ensure that resources made available to support each services are used for the purposes for which they are intended and are not diverted to support other areas of activity.
- Local authorities have a significant role to play in providing strategic oversight of provision and supporting school-level practice.
- Local authorities have taken a leading role in the provision of these services and developed specialised ethnic minority achievement and English as an Additional Language services located within local authorities, as well as the development of specialised pedagogies.
- 'Ring-fencing' of the Ethnic Minority Achievement Grant provided an important incentive for schools to buy-back resource-intensive ethnic minority achievement and English as an Additional Language services from local authorities.

- Ring-fencing combined with significant increases in per-pupil funding levels of over £1000 per relevant pupil in real terms between 1997 and 2006 resulted in the retention by many local authorities of comprehensive, high-quality ethnic minority achievement and English as an Additional Language services.
- Key aspects of the Coalition Government's policy agenda have begun to affect significantly these longstanding features of ethnic minority achievement and English as an Additional Language provision.
- The decision of the Department for Education (DfE) to end the ring-fencing of Ethnic Minority Achievement Grant funding, from 2011/12, and incorporate it into the Dedicated Schools Grant has given schools complete decision-making power over the uses to which the proportion of the Dedicated Schools Grant, comprised of the former Ethnic Minority Achievement Grant funding allocated to them, can be put. This has ended the requirement on schools to ensure that the funding is allocated to supporting the needs of black and minority ethnic or English as an Additional Language learners.
- Pressure on local authorities has intensified as a result of the diversion of the proportion of Dedicated Schools Grant funding to academies and free schools that would otherwise have been available to fund central local authority ethnic minority achievement and English as an Additional Language services.
- In schools where devolved Ethnic Minority Achievement Grant funding was available, the discontinuation of ring-fencing may result in a deterioration in the scope and scale of ethnic minority achievement and English as an Additional Language provision.
- Where core local authority funding has been used to support ethnic minority achievement and English as an Additional Language services, this funding will also come under significant pressure given that it is likely to be regarded as a discretionary rather than a statutory area of activity, notwithstanding the ongoing legal duty on local authorities to promote equality and community cohesion.
- Incorporation of the Ethnic Minority Achievement Grant into the Dedicated Schools Grant places at risk the ability of the education system to continue to close achievement gaps and to build on the progress secured under previous arrangements.
- Evidence from school leaders and teachers suggests that the impact of changes to funding arrangements for ethnic minority achievement and English as an Additional Language services has been to put the future of these services at risk.
- Interviews and scrutiny of local decisions on the devolution of former Ethnic Minority Achievement Grant funding suggests that the concerns set out elsewhere in this Report about the pressures on local authorities to retain less funding are becoming evident in practice.
- Even where former Ethnic Minority Achievement Grant funding has been retained, pressures on local authority budgets are leading in some instances to a reduction in the contribution to ethnic minority achievement and English as an Additional Language services secured from core local authority budgets.
- Over a third of school leaders confirm that resources for ethnic minority achievement and English as an Additional Language provision across their local authority are decreasing, with resources being diverted towards other activities.
- A third of school leaders confirm that local authority support for black and minority ethnic and English as an Additional Language pupils has become more difficult to access over the past year.
- Evidence indicates that it is unlikely that schools will be in a position to address shortcomings in provision from their own budgets.
- When asked to predict future changes to the proportion of their schools' budgets allocated to securing ethnic minority achievement and English as an Additional Language services, almost half of school leaders expressed the view that allocations of funding for these services would be likely to decline.
- Evidence confirms that cost pressures have led to redundancies among ethnic minority achievement and English as an Additional Language teachers in their schools; 19% of school

leaders reported that they were aware of redundancies of such staff in their local authority or in other schools in their local authority area.

- Half of school leaders stated that pressures on schools to meet the needs of English as an Additional Language pupils had increased over the past year, with a further 65% stating that current resources were insufficient to meet these demands.
- Reductions in the extent of ethnic minority achievement and English as an Additional Language provision are occurring at a period when demand for such services is increasing.

CONCLUSIONS

The findings of the NASUWT's investigation into the impact of Coalition Government policy on the quality and scope of ethnic minority achievement and English as an Additional Language services suggest strongly that the negative consequences for learners and staff anticipated by the Union are becoming an increasingly prominent feature of the education system in England.

The evidence gathered by the NASUWT indicates that levels of identifiable funding for ethnic minority achievement and English as an Additional Language provision are declining and that the ending of dedicated resourcing of this provision through the abolition of Ethnic Minority Achievement Grant is leading to resources being diverted away from ethnic minority achievement and English as an Additional Language services to other areas of activity due, at least in part, to increasing financial pressure on school and local authority budgets and to a decline in the strategic influence of local authorities in this area.

As a result, specialist ethnic minority achievement and English as an Additional Language teachers and other specialist staff are being made redundant or seeing their job security eroded. Those remaining in post are confronted by increasing demands for their services in a climate where the resources available to them to meet these demands are coming under increasing pressure.

More detailed investigative work is planned to consider more fully the extent of the impact of the changes in policy and practice set out in this report and the impact over time of the Coalition Government's policy on the educational progress and achievement in our schools of black and minority ethnic pupils and pupils for whom English is an Additional Language.

SECTION 2

Accounts from experienced practitioners and lead EMA/EAL professionals in England

GENERAL POINTS

Inconsistency and moves to commercial or semi-commercial models

Some services in England that were retained within some form of centrally-managed team by the LA have had to move towards semi-commercial or 'traded' models where they produce materials and products for sale or offer training and consultancy outside their own LA to generate enough income to maintain provision and staffing within the LA.

Some have moved to buy-back arrangements of various sorts, in which schools opt to commit a portion of their budget to buy in to provision offered by the service or buy, on a less-formally structured basis, as and when they want specialist input.

Neither of these approaches have resulted in pre-change levels of funding being maintained.

In other LAs in England, where funding has been delegated wholly to schools, many staff who were previously centrally-employed have lost their jobs and those who felt able to, have become independent consultants bidding for work in competition with other commercial companies selling products such as literacy interventions. This has opened up the field of supporting minority ethnic learners to the marketplace in a way that could be both economically inefficient and less beneficial to minority ethnic learners and school staff's professional development, without a coherent body of specialist expertise to validate best practice.

There is a danger that schools fail to invest in areas of education provision that they need and they do not recognise their need because other priorities dominate agendas. Some schools are spending substantial amounts of money on Literacy Catch-up and other commercial programmes, which sell themselves as beneficial to EAL learners without a robust research base. There is clear risk of failure of the market to provide what is needed in a field which decades of practice have shown requires teachers to modify their ways of teaching and learning to be fully inclusive of EAL learners, rather than rely on quick-fixes. The potential wastage of money invested in projects or spent on training and resources that are not fit-for-purpose is something that schools can ill-afford.

Employment of less qualified or lower-skilled staff and generalisation of specialist staffing

Schools are tending to employ generalist Teaching Assistants (rather than more qualified Bilingual Teaching Assistants or more expensive EAL/EMA teachers), sometimes with little or no experience or qualifications in this field, or they have 're-employed' Teachers and Bilingual Teaching Assistants with delegated school funds to work as class teachers or general Teaching Assistants with a more disparate range of responsibilities.

The loss of specialist expertise, the lack of job security, the deprioritised status of this area of work and the comparatively poor coverage of this area of education in Initial Teacher Training (according

to the DfE annual survey of NQTs), means that schools and the remaining central services have difficulty recruiting high quality staff to fill available posts.

Community Cohesion

The impact on community cohesion is a concern as this area of work has always aimed to support integration between CYP of different backgrounds and promote social mobility.

PERSONAL ACCOUNT 1 – NORTHERN ENGLAND

All situations I have observed where EAL staff have been employed directly by a school, particularly as an individual or in small numbers, have led to significant marginalisation. In local authorities where this has happened (I have seen it in xxxxxx and xxxxxxxxxx and have anecdotal information from colleagues from other areas) staff have become separated from their source of expertise and specialist development, have lost status in their school and have become ineffective because of one or both of these issues. Their schools have then ceased to use them as EAL specialists and have sought support from outside the school or have given responsibility to a mainstream middle leader with no background in EAL. I can give more specific examples of this if you would find it useful. When I worked on the xxxxxx xxxxxxxxxx EAL Strategy, I went into lots of schools where this had happened and had conversations with head teachers, middle leaders and EAL staff which informed my view. Even in our schools in xxxxx, this has happened to some extent. In 2006, some EAL staff, mainly bilingual language assistants, were transferred to the schools they were based in. Over the last 10 years, their expertise has dwindled and when they have left their jobs, their posts have not been replaced with a similar one. They are often not used specifically for EAL support but more in a general teaching assistant capacity.

In our authority, where we've managed to retain a central service through a formal buy-in arrangement with schools, marginalisation is an issue but I think we do better with this than many other services/ EAL staff I know. This is partly assertiveness on my part and trying to develop this in my team. The specialist qualification is important. We are not there as an extra pair of hands – we are a specialist service, we are qualified in our field and we are there for specific work. There is usually some introductory discussion between a senior leader from our service with the head or deputy of the school before new work there is begun. This sets the tone and helps to establish appropriate expectations on both sides.

As a team, we have frequent informal discussions about how work is going in the various schools. This enables me and xxx to guide staff along the way and intervene if necessary. I encourage staff members to take responsibility for resolving any issues themselves but offer advice about how to do it. The staffing is stable in the service and so staff are known within the main schools we work in. This enables them to develop relationships, gain trust and show their worth. I have worked in this authority for 24 years so I know lots of staff in schools as well in the LA. Because I have done additional work outside of the authority, qualified as an Ofsted inspector and am part of the School Improvement team, it adds to the weight of the Service.

Keeping up to date and ahead of the game on educational issues affecting schools, not just on EAL, is important in supporting schools and also in being able to speak with authority about education in a

wider sense. If we only knew about EAL, we would not be as credible. We need to be able to engage in discussion about educational developments in general and to support schools in developing/ addressing these in a way which will be effective for EAL learners as well as E1L pupils.

CPD delivery is also important in raising our status in schools. CPD is often linked to project work in schools and when staff from those schools come to CPD sessions and see their partner teachers leading the session, they see them more as an expert and how their expertise is valued by others. It's a struggle to find time to ensure everyone has the CPD they need to develop as much as you would like but all our teachers and many support workers have done the Bilingualism in Education programme and other support workers have done qualifications focusing on EAL at level 4-7. We pair or group staff to deliver CPD so that a more experienced member of staff is with a newer one.

Capacity building in schools is built in through partnership teaching, work with SLT, linked CPD and/or discussion and collaboration with class/subject teachers. This is stronger when we are working on raising attainment projects more focused on advanced EAL learners/ whole classes and less so when we are working with individual new arrivals. However, there are mechanisms within each case to promote capacity building. Raising attainment partnership work is very focused on developing class/subject teacher understanding and use of effective EAL strategies. New Arrival support is mainly in-class, includes collaboration and some planning/evaluation with the teacher and discussion of strategies which will be most useful in supporting their language development in the immediate future.

The central service is absolutely key to all of this (and more). The breadth and depth of expertise and EAL offer to schools would not be possible without it. The specialist EAL CPD for our staff would not be possible without us being a strong EAL service. The Bilingualism in Education programme continues to be used so that our staff and others can have that specialist study and qualification, developing and sharing ideas from the course across the team over time. Interaction within the team is crucial to ongoing development in all aspects of work. The structure enables engagement with schools at a range of levels – with heads and senior leaders, middle leaders, class teachers and teaching assistants.

EAL staff working alone or in a pair in a school/ group of schools cannot deliver effective support or develop in this way.

PERSONAL ACCOUNT 2 – LONDON

When EMAG was abolished, our authority dispensed with virtually everything in terms of advisory teachers and EMAG staff. There is no one left with an EAL hat on. You don't need me to tell you of the dangers of haemorrhaging specialist support - you know the arguments. The problem is no matter how much you say this to your superiors, the message does not sink in, and yet I spend my life going round schools which are desperate to know how they can support their EAL learners and it is a constant reinvention of that clichéd 'wheel'.

When we were going through the second phase of redundancies 6 years ago in the LA, they floated this idea of a buy-back arrangement whereby you still stayed as LA staff, but you sold your services locally and further afield with the express intention of clawing back 120% of your salary - notice not

a 100%! In other words you saved costs and made a profit. The proposal was problematic and convoluted, and frankly after the strain and stress of managing 2 years of redundancies etc. we decided to go it alone as a private company. We set ourselves up as an independent consultancy and ended up in the local Teaching School because I knew their SLT over many years and they recognised the benefits of what we could bring to them in terms of supporting some of their bids. In return they give us accommodation, IT, phones, etc. there is an annual rent but most of that is paid in kind by work we do for them with PGCEs, projects etc etc.

However, forging a new buy back arrangement with the LA can work, and the best person to talk to would be xxxxx xxxxx who works for xxxxxxxx Council doing EAL and literacy work. They are still hanging on in there with a small team and I think the big difference between their arrangements and what our authority offered us 6 years ago is I get the sense that their authority want it to work and don't want to lose the terrific expertise embodied in xxxxx and her team.

PERSONAL ACCOUNT 3 – EASTERN ENGLAND

With EMAG we were a much bigger team (20ish), with specialist teachers mainly teaching children directly when schools bought support in using the EMAG money. Some was put aside for management before we underwent cuts etc.

Our support then was time restricted and what did not happen as well as it might have, was whole school training, liaising with SLT in a school and embedding strategies to empower all teachers and support staff. It was very personalised to the learners needs however.

We were then cut back to effectively 8 EAL Advisers. We were initially expected to be 'fully traded'. That model did not work, and we were in danger of disappearing, but then secured Central Schools Grant funding for 4 Advisers. Since then we have begun to work far more strategically with schools, to build capacity, run courses, think outside of the box to also 'earn' an income and promote our service.

We now rarely get to work with children and model strategies, but we have had more freedom by not being employed directly by schools and often expected to do a certain job, mainly in a specialised TA role. That was hard to dispel at times.

In many ways we are more 'effective' because we have more 'sway' with SLT in schools due to our slightly elevated position as 'Advisers' and working for the Teaching and Learning Advisory team, but we can only really do that because we have had other funding since EMAG went. We also try to persuade schools to spend their EAL pupil funding on our help too.

A DROP IN EAL AND SOME MINORITY ETHNIC GROUPED PERCENTAGES IN ENGLAND

It may be worth noting that, in 2014/15, **the percentage of EAL learners** (pupils whose first language is not recorded as English) attaining the 5+ A*-C GCSE including English and Mathematics in England **dropped for the first time in several years by 0.1%** (discounting the 2013/14 drop for all groupings of pupils following the revision of GCSEs.)

A lag of 3-5 years is about the length of time one would expect for a long-term impact to show up in attainment figures, for a grouping of pupils who have not received as much targeted funding or support through their secondary school years compared to past cohorts. (There was a similar time-lag in improvements in outcomes during the 2000s following the National Strategies and London Challenge initiatives.)

The figures for the Any other White background, Mixed White and Black Caribbean, Mixed White and Asian, Indian, Black Caribbean, Black African and Any other Black background also fell by varying percentages.

The figures for **pupils whose first language is English and the White British grouping rose by 0.7%**. (SFR01_2016_Characteristics_National_Tables).

Whilst we should not read too much into one year's results, this pattern hints at a decline in the attainment of EAL learners and some minority ethnic grouped outcomes a few years after EMAG funded support was removed and funding delegated to schools; an outcome which might be predictable as a long-term consequence of reduced quantity and quality of ring-fenced provision.

SECTION 3

Personal accounts concerning the delegation of funding to schools in Cardiff

INTRODUCTORY REMARKS

Changes to the centralised service

For at least eight years, Cardiff EMAS underwent reviews and modifications to service structure including pilots for devolution or delegation of MEAG funding and staffing to schools. Whilst devolution appeared to be popular and quite successful in schools where specialist teachers and TAs were based full-time, the progressive erosion of the stability and status of the central service demoralised some staff and constrained flexibility. Following the successive Welsh Government cuts and abolition of the MEAG, the process was taken to its conclusion with further reductions in specialist staffing and more delegation to schools. The central team has now been significantly reduced in size and schools employ a proportion of the teachers and teaching assistants who were previously centrally employed, although others have gone. Schools have the freedom to allocate these staff members to whichever responsibilities they choose. Accounts below suggest not all of these staff have been retained in post or with an EAL specialism but, as far as I know, no-one at LA level is monitoring staff allocations in schools.

Cardiff's standing in local authority rankings by ethnicity

In 2015, I requested from the Welsh Government Statistics department, a set of figures on attainment by ethnicity for each Local Authority – using aggregated figures from 2009-2014 to ensure as many disclosable figures for individual ethnicity sub-groupings as possible. Based on these statistics, in the L2 Threshold Inclusive, Cardiff is the **lowest ranked** of all Local Authorities for six of the ethnicity sub-groupings and is **near the bottom** for at least six other sub-groupings. Taking an **average of all the minority ethnicity group percentages**, Cardiff is **the lowest of all** the Local Authorities. In terms of comparative rankings, Cardiff's White British figure is **the second highest** of all their ethnicity subgroupings (14th/22) after Chinese or Chinese British (4th/15). (See Table 1 below.)

Table 1: Cardiff's ranking out of all LAs in Wales, 2009-14 aggregated data, KS4 L2 Threshold inclusive

Ethnicity	Cardiff's ranking
All Pupils	15 th /22
White British	14 th /22
Any Other White Background	15 th /22
Traveller	No data disclosed
Gypsy/Roma	No data disclosed
Mixed (All)	20 th /22
Mixed White and Black Caribbean	16 th /16 for which data were disclosed
Mixed White and Black African	13 th /13 for which ...
Mixed White and Asian	17 th /20 ...
Any other Mixed background	16 th /20 ...
Asian or Asian British (All)	19 th /20 ...
Indian	14 th /16 ...
Pakistani	7 th /10 ...
Bangladeshi	9 th /10 ...
Any other Asian background	14 th /17 ...
Black or Black British (All)	14 th /14 ...
Black Caribbean	3 rd /3 ...
Black African	9 th /9 ...
Any other Black background	3 rd /3 ...
Chinese or Chinese British	4 th /15 ...
Any other ethnic background	17 th /18...
All Minority Ethnicities percentages averaged	22 nd /22

These statistics are not a ringing endorsement of Cardiff's capacity to meet its minority ethnic pupils' needs prior to the EIG and raise questions about whether or not they are ready and adequately equipped to take on the full responsibility for doing so, with reduced funding and specialist staffing. In his evidence to the Committee, Cardiff's Director of Education stated that "over the last three years we've made significant progress in accelerating the progress made by minority ethnic pupils overall and by the end of KS4 age 16 on the level 2 plus measure, the gap between ethnic minority pupils and white UK pupils in Cardiff is now 0.7%". Whilst this sounds encouraging, the questions to be answered are whether or not the changes made to the service structure and delegation to schools are in any way responsible for this narrowing and whether or not they are going to enhance the knowledge and skill levels of the school workforce in the future, bringing about long-lasting improvements in quality of provision and better outcomes for minority ethnic pupils.

Taken together with the accounts from England above, the following personal viewpoints suggest that this is not guaranteed.

ACCOUNT 3: CARDIFF - PERSONAL VIEWPOINTS

What happens when you delegate money to schools?

As a qualified teacher who speaks xxxxxxxx and who is Muslim, my postgraduate qualifications and experience offered no protection. After I was delegated to a school when the funding changed, the acting head teacher there told me on at least on two occasions that she wasn't sure what she would do with me 'if the school's budget was cut.' She meant that she would no longer be able to keep me as an EAL teacher, or at all. Since I have left that school, the funding that was attached to my post has been absorbed by the school and my post was deleted. There is such a climate of fear now to be honest. Even staff like me, who are educated, articulate and confident are still afraid to speak openly about what is going on.

The question needs to be asked: What really happens to provision when staff are delegated to schools? Rather than simply claim that this is a wonderful model because it 'empowers' schools, the question should be, has this model empowered the real stakeholders: minority ethnic pupils, EAL and Minority Ethnic Achievement staff and the families with whom they work?

I know that a huge part of my job was and still is to help parents and pupils have a voice within an education system that they for many reasons find difficult to access. If my own voice as an advocate is dismissed, what chance do my pupils and their families have?

I felt that the impact on me and other colleagues like me was not worthy of consideration. This is how we were made to feel as staff, that we really didn't matter, that our concerns about the future of the pupils we had been supporting did not matter, that our concerns about our own futures didn't matter. No one stopped for a second to consider how the merging of grants or the delegation could affect the employment of Minority Ethnic staff.

At one particular meeting for all EMTAS staff in June 2015 a question was asked: "After we are delegated is there anything that could stop a school from changing our job description from specialist language teacher to 'teacher'?" The answer given was that the school could indeed change the job description and that as long as the EAL pupils' outcomes were good, it was up to the school to use its staff in the way it saw fit. In other words, there was no move to put anything in place that could ensure we continued in our role as EAL teachers after the delegation. That decision not only left us feeling undervalued, and utterly demoralised, but it opened up a risk of resources not being used as they should. We were told that EAL was now a 'mainstream' issue given that there are high numbers of EAL pupils in Cardiff schools. That answer implied that as the numbers of EAL pupils were growing and many were 'doing well,' there was no need for EAL expertise anymore.

Another point was raised asking if schools would be obliged to carry out recommendations made by Advisers and what plan there was for ensuring that any recommendations made by the Advisory team were implemented. The answer came that there was no plan. I don't think the idea of 'early days' works here as it implies we can wait for more money to be 'wasted' before we act. Staff are reluctant to engage with EAL professional bodies because they are told EAL is now a 'mainstream' issue, EAL pupils are doing well and supply agency staff who have no specialist training can do the jobs they used to do just as well.

From conversations with friends I used to work with in Cardiff, I cannot see the picture that is described about the maintenance of the provision. As far as I know the delegation has been an absolute disaster. When I was delegated, my situation led me to resign and find employment

elsewhere. I wasn't the only one leaving, so the question needs to be asked about real numbers of staff who have left. I know for a fact that some schools now are employing Bilingual Teaching Assistants through agencies on a supply basis to try and support the huge numbers of recent new arrivals. While this may not sound like such a bad idea, the question is who is training these agency staff, are they experienced staff and how does this kind of 'temporary' provision impact on the quality of provision?

There is also an important point about disapplying pupils. When they are disappplied, these pupils' results are ignored; the pupils' needs are ignored and the 'buck' is passed on from school to school until they become a 'problem' that has to be 'counted.' The big problem with simply focusing on outcomes is that these pupils, and they are in the thousands, are treated as an inconvenience.

I have heard that, in a number of Cardiff schools with large EAL pupil populations, the delegated EAL teachers have either left and not been replaced at all, or the post was filled by a Teaching Assistant or these EAL teachers are working at reduced hours or are covering PPA or have taken a mainstream post as a class teacher within the school. I just heard yesterday that a colleague working in one of the schools has been asked to give up her EAL role and work as a class teacher so she is taking early retirement. She is a very experienced EAL teacher who has more than 15 years of experience teaching EAL pupils. I think many schools in Cardiff had a field day when they were given the funds directly. The idea that delegation is the model to be copied is frightening and misguided.

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I have spoken to a number of ex-colleagues from Cardiff and none of them have anything positive to say about the new model of working. If what colleagues have outlined is accurate it is deeply concerning. If all the money were to be bundled into the Revenue Support Grant, the erosion could be accelerated and more expertise lost as a consequence. There is absolutely no guarantee that the money will be prioritised or spent to meet the needs of these groupings of learners.

Poverty, Ethnicity and the Pupil Deprivation Grant

Some important points to note about poverty, ethnicity and data analysis

Greater understanding is required when comparing data by ethnicity

In the detail of public service provision it is appropriate to move towards a more nuanced examination of the different characteristics of distinct ethnicity subgroupings in data rather than treating all ethnic minorities as an homogenous group. For the purposes of measuring equality in education, each subgrouping should be compared against the figure for *All Pupils* as the default, so ethnicity is treated as a feature of *all* learners including those of White British majority backgrounds.

However, there are times when it is helpful to examine a binary *majority versus all minorities* distinction. There is still a need to maintain a coherent overview of the wide range of issues affecting minorities in Wales across education and other policy areas because of the significant influence that psychological perceptions of race and ethnicity have on social relations and personal decision-making. Minority status remains a factor to be recognised in discussions about policy, practice and data analysis.

Ethnicity should not be regarded as a potential *causal* factor

Multi-layered analyses within ethnicities are needed to identify particular groupings of learners who most require targeted or differentiated provision (e.g. attainment by ethnicity, gender and eFSM) but great care needs to be taken not to misinterpret ethnicity as a causal factor in variable analyses. This has been a fundamental flaw in many prominent statistical studies, which have contributed to inappropriate conclusions being drawn about the significance (or lack of significance) of ethnic differences, especially in the area of poverty and deprivation.

We need a genuinely inclusive approach to provision for a diverse population

A genuinely inclusive approach to education starts with the diversity of individual pupil needs, discerns grouped characteristics of those who share common identities, capabilities, experiences or circumstances and explicitly recognises these as different strands within a coherent national strategy.

The 2013 Joseph Rowntree Foundation report (<https://www.jrf.org.uk/report/poverty-and-ethnicity-wales>) on Poverty and Ethnicity in Wales identified that:

- *Schemes to reduce poverty within particular ethnic groups need to form part of population-wide anti-poverty strategies.*

It did not recommend that poverty should be addressed in a non-discriminating way for all learners, or just those who are eFSM, but that schemes targeted at minorities should *form part of* population-wide strategies. The report also points out that work should look beyond outcomes to causes.

- *It is important to look beyond outcomes, which may be associated with ethnicity (such as higher levels of poverty amongst some ethnic groups) to focus on underlying causes.*

This too was not saying we should overlook differences by ethnicity but that we should be more discerning in examining the differences. Some of the work carried out by specialist professionals in minority ethnic and GRT provision has tried to directly address some of the causes that extend

beyond the classroom, engaging with families, communities and other agencies. A generic focus on Poverty, with funding directed to schools, has rendered some of the distinctive needs of GRT, minority ethnic and EAL/WAL CYP somewhat marginalised.

The JRF report also highlights the need to provide English language support and cultural awareness training for frontline staff.

- *Some targeted work would be of particular help for specific groups, especially English for Speakers of Other Languages provision and cultural awareness training for frontline staff in some services.*

The reference to ESOL, whilst providing a very welcome focus on adult language development, has perhaps distracted from the extensive EAL/WAL provision and cultural awareness development offered by central service staff in schools in the past, both of which are still very much required to meet the ever-growing needs in this field and bring about long-term change. Expertise in additional language development and cultural diversity is not wide-spread throughout schools in Wales (almost 90% of which now have at least one minority ethnic pupil on roll), so relying on school to school sharing is not the ideal mechanism for disseminating best practice.

A follow-up Viewpoint report from the Joseph Rowntree Foundation in 2016

(<https://www.jrf.org.uk/report/breaking-links-between-poverty-and-ethnicity-wales>) also makes the following related points:

- *There are clear links between poverty and ethnicity in Wales. This is not a new phenomenon, and current predictions are that these links will continue for decades to come.*
- *This is something we can change – a closer look at the UK data shows clear variations across time and place. It is a diverse picture, both between and within ethnic groups. This shows that different contexts can reduce or increase poverty linked to ethnicity.*
- *Tackling poverty and reducing ethnic inequalities are not new aspirations. Breaking the links between poverty and ethnicity will demand leadership and innovation. We need to find different ways of doing things. This requires better evidence, more effective ways of sharing learning, and the flexibility to respond quickly.*

Comparing the ‘gaps’

The Welsh Government’s high level aims and objectives to reduce poverty, reduce its impact on pupil attainment and to work towards greater equality of outcomes for all learners are admirable and ambitious. I would not disagree with those goals but, within the broader picture of pupil achievement, there are other issues which need prioritising too.

One of the problems with the Tackling Poverty Agenda is that it tends to focus on simple percentage gaps between eFSM and nFSM pupils in a way that disguises the extent that poverty impacts on different ethnicity groupings and communities, and omits consideration of some of the other factors that can impact on attainment.

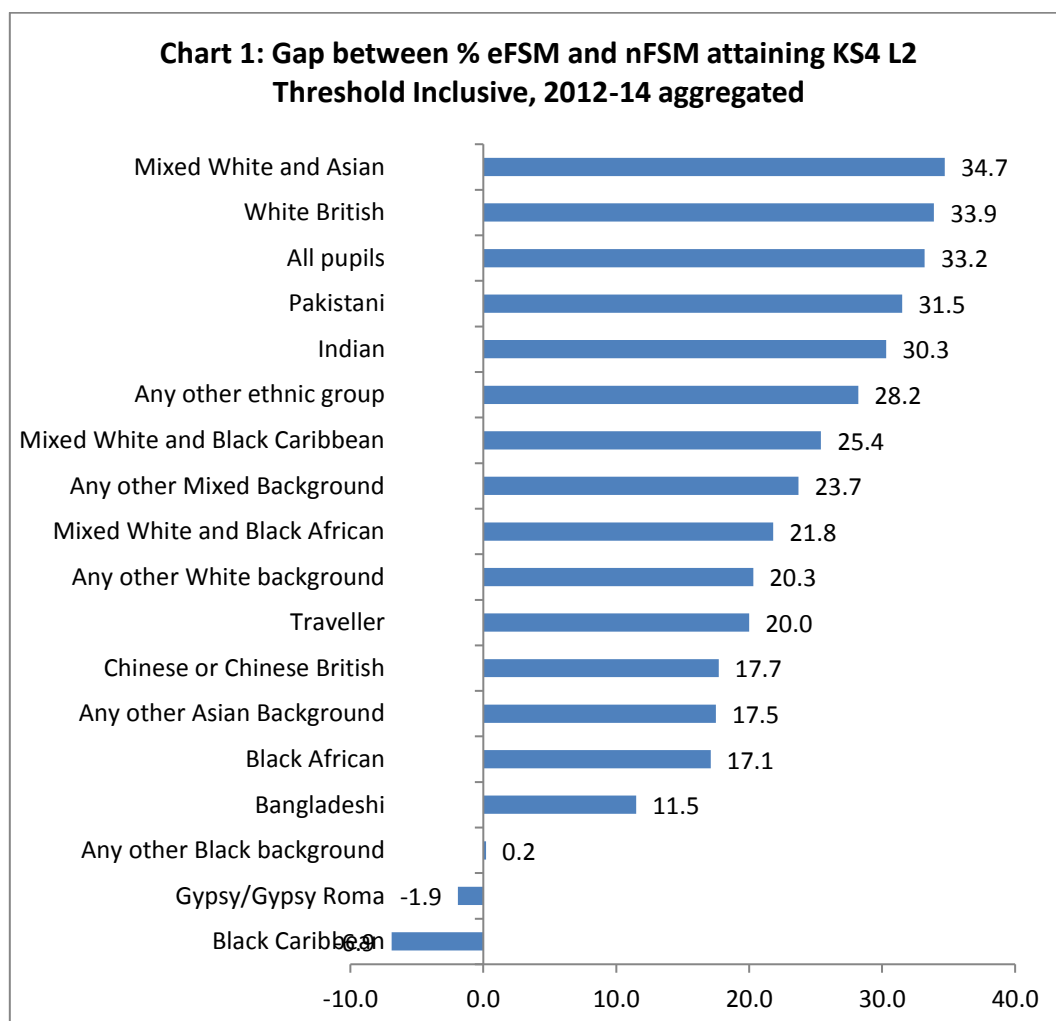
The following charts illustrate two different ways of looking at the data which highlight why the simple attainment gap indicator between eFSM and nFSM is not the most useful for drawing comparisons between ethnicity groupings.

A simple gap analysis

Chart 1 presents a simple gap analysis of the intermediate level ethnicity groupings of pupils who are eFSM and those who are nFSM attaining the L2 Threshold inclusive at KS4, aggregated from 2012-14.

The figures show a clear correlation for most ethnicity groupings between poverty (as indicated by eFSM) and lower percentages of pupils attaining the target outcome. They suggest a significant need for investment and intervention to tackle low attainment amongst pupils from low income families across virtually all groupings. The White British grouping has the second-largest gap after Mixed White and Asian and, as White British pupils make up over 92% of the KS4 cohort (approx. 90% of the total cohort across all Key Stages), these data appear to suggest that this grouping clearly needs targeting if the national statistics are to be raised.

However, the figures show that the correlation between eFSM and attainment varies markedly across the ethnicities, and they make it look as though the poverty-attainment correlation is not significant for the Any other Black background grouping nor for the Gypsy/Gypsy Roma and Black Caribbean groupings, which show a negative correlation. In my view, this approach to analysing the data and the patterns it yields are quite misleading.



Analysing proportions of pupils within ethnicity groupings NOT attaining target outcomes

For equality purposes, the aim of monitoring the educational experiences or outcomes of pupils by the protected characteristic of race/ethnicity is to identify any significant differences between the *proportions* of pupils in each grouping.

Rather than looking at the 'gap' between the attainment percentages for those who are eFSM and those who are nFSM, a more productive way to examine the data by ethnicity is to look at the percentages of pupils in each grouping who are NOT attaining the target outcomes as a *proportion of the whole* grouping. Using this approach, the data patterns are quite different from those found by simply looking at the percentage 'gap' between eFSM and nFSM.

In contrast to Chart 1, Chart 2 shows, not only that substantial percentages of pupils from several ethnicity groupings near the bottom of the previous 'gap chart' are nearer the top, with White British 2/3rd of the way down, but also that the percentages for Mixed White and Black Caribbean, Black African, Traveller and Gypsy/Roma are substantial. The percentage of White British pupils who are eFSM and did NOT achieve the L2 Threshold Incl., as a proportion of the whole White British cohort is 11.7%.

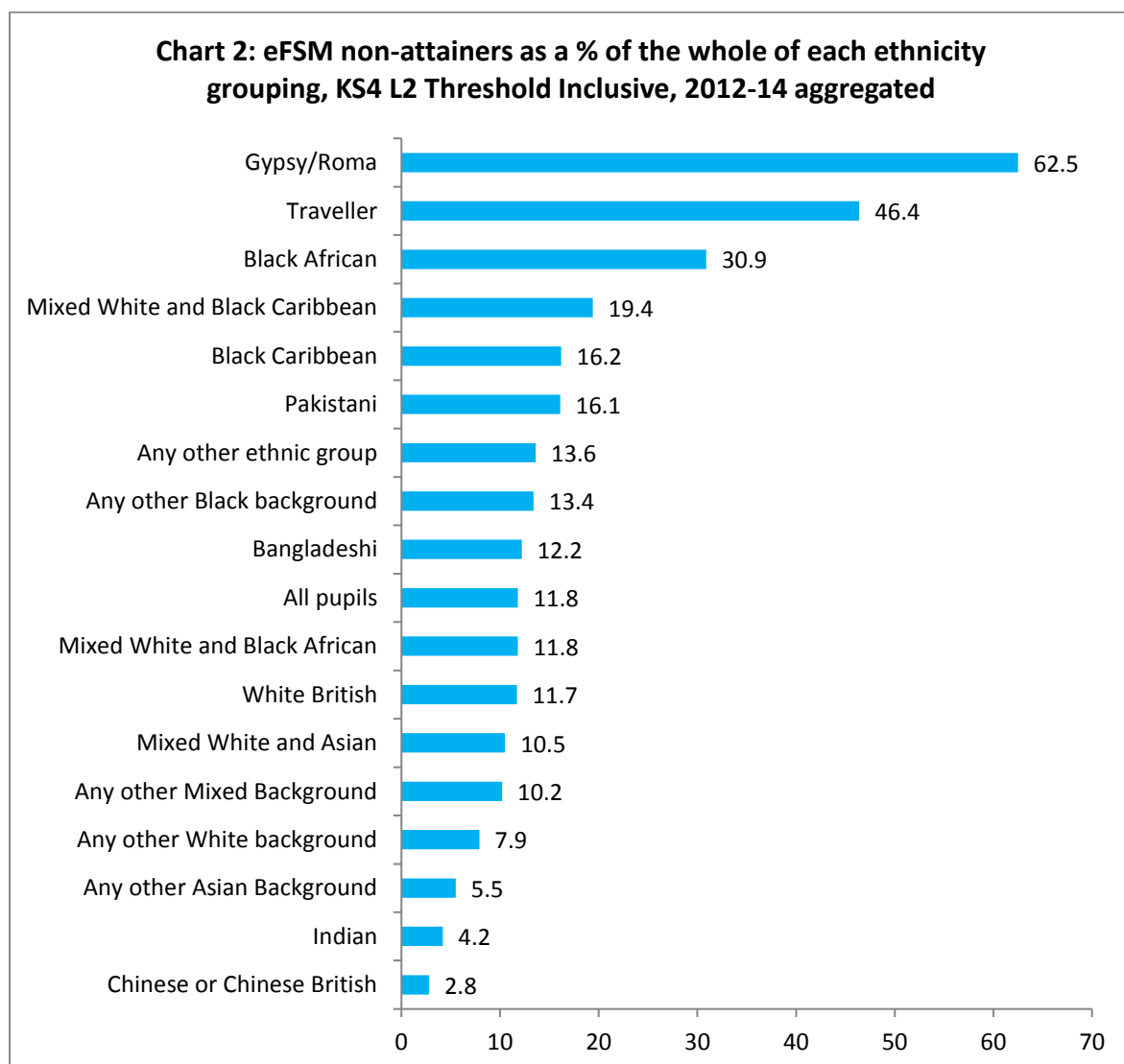
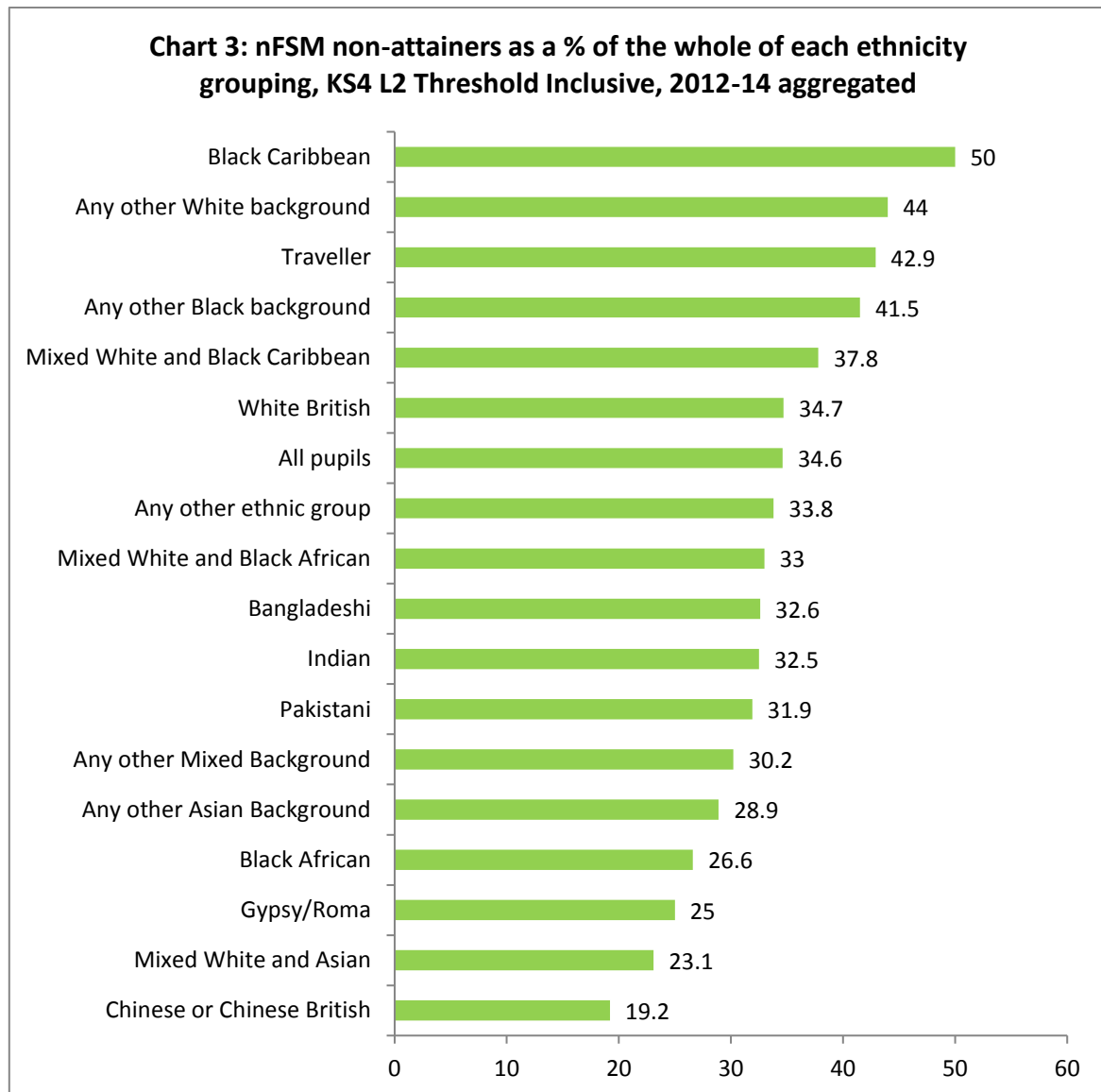


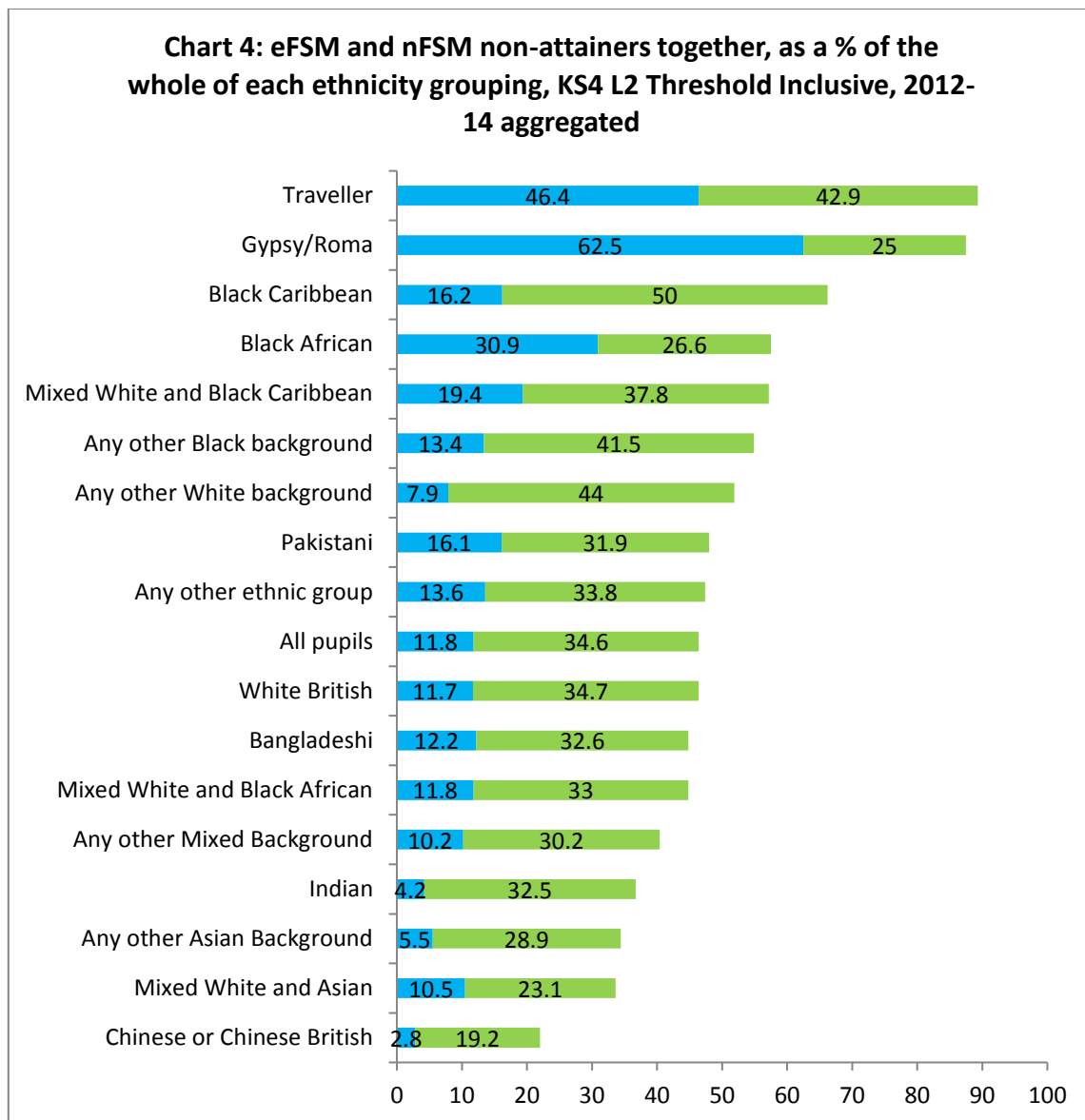
Chart 3 shows the proportion of pupils who are NOT entitled to FSM (nFSM) who did NOT achieve the KS4 L2 Threshold Inclusive, 2012-14.

There are six ethnicity groupings with higher figures than the All pupil average with, most notably, 50% of Black Caribbean and 44% of Any other White background pupils who are nFSM and are not attaining the target level. 34.7% of White British pupils who are nFSM do NOT achieve the target, three times more than the number of eFSM pupils, with the White British grouping now 2/3rd of the way up the chart. These figures suggest that other factors, in addition to or in interaction with low income, are having a substantial impact on some of these groupings.



Combined data of proportions of eFSM and nFSM pupils who are NOT attaining target outcomes

When we combine the data from both charts, we get the full picture of those who are NOT attaining the outcomes by eFSM/nFSM for each ethnicity grouping. These are the pupils who need targeting.



Compared to Chart 1, Chart 4 better reveals the more pronounced needs of a number of minority ethnicity groupings, compared to the national average for All pupils, both in terms of poverty and in the percentages of pupils NOT attaining the L2 Threshold Inclusive, both eFSM and nFSM. The White British grouping is now just below the national average figure, which puts a rather different perspective on the dominant discourse about Poverty and Attainment in recent years.

It also shows how a substantial amount of money and educational intervention is being invested to raise the attainment of a comparatively small proportion of the school population to narrow the gap between those who are eFSM and nFSM, whereas, actually, much larger numbers of those who are nFSM are not attaining the target outcomes. This is not to decry the investment in the very pressing needs of pupils in poverty and, indeed, it is likely that nFSM pupils may benefit from some of the whole-school activities funded by the PDG, but it does raise questions about targeting of resources.

Arguments for and against the PDG benefiting minority ethnic and GRT pupils

The argument that has been put forward by the Welsh Government concerning the PDG is that larger proportions of pupils from several minority ethnic groupings are eFSM and therefore these groupings should benefit 'disproportionately' (sic) from PDG funding.

"The cohort of children and young people who benefit from this grant contains a disproportionately high number with protected characteristics, including children and young people with disabilities or additional learning needs; Gypsies and Travellers, African, Caribbean, Pakistani and Bangladeshi race; and those of Muslim religion. Therefore, the increase in the grant will have a positive impact on these groups." (p22 of the Strategic Impact Assessment for the 2015-16 draft Budget <http://wales.gov.uk/funding/budget/draft-budget-2015-16/?lang=en>)

"The programme should produce a positive impact that will be felt disproportionately by groups with high proportions of eFSM pupils."(p9, 10 The Equality Impact Assessment for the Rewriting the Future Programme <http://gov.wales/docs//equality-impact-assessments/141106e-EIA-Rewriting-the-Future-Programme.pdf>)

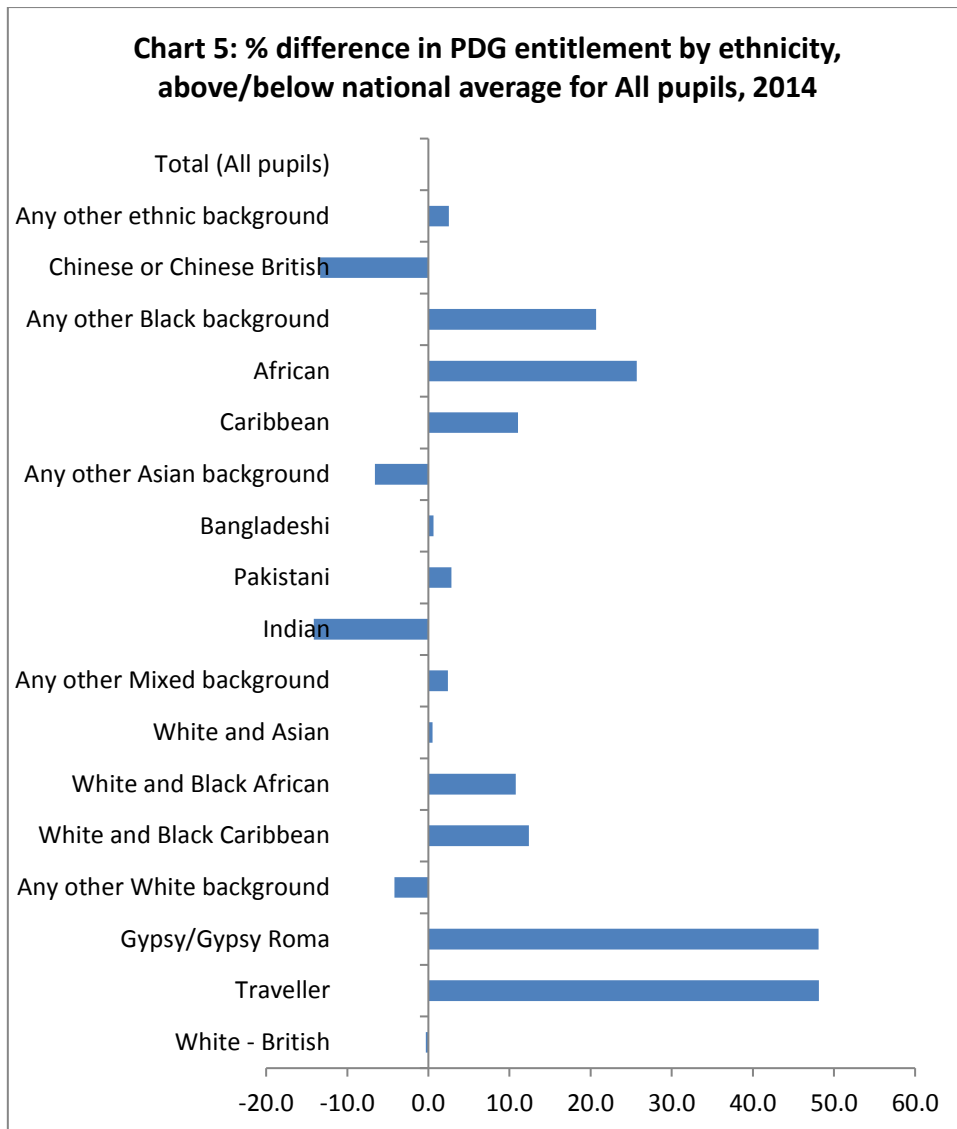
These presumptions require some interrogation to examine their validity in respect of both the funding and the programme benefits in the context of the reductions to the MEAG and GT Grant and their amalgamation within the EIG.

Data were requested from the Welsh Government Statistics department for eFSM entitlement by ethnicity for 2014 on which 2015/16 PDG allocations were based because eFSM figures broken down by ethnicity are not routinely published in Wales. (The dataset provided did not include Early Years PDG and LAC funding.) This dataset was used to calculate the net 'financial benefit' of the PDG for 2015/16 for different ethnicities, based on PDG entitlements.

Chart 5 (below) reveals wide variation in the PDG entitlement for different ethnicities compared to the national average. Some ethnicities have below average entitlement, others above average.

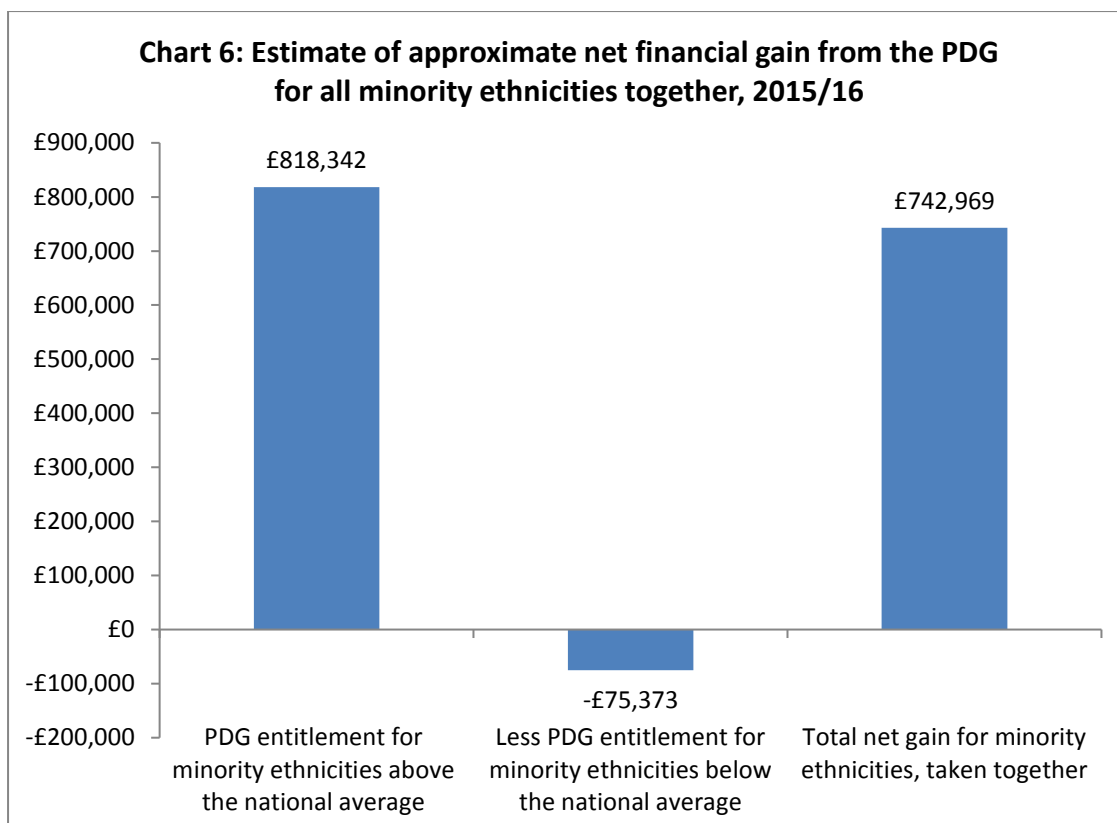
Using this dataset, the total number of minority ethnic pupils benefiting from PDG *above* the national average (or 'disproportionately' as the Welsh Government puts it) is 708. At the 2015/16 rate of £1050 per eFSM pupil, the net 'gain' to all minority ethnicities taken together is £742,969 (Chart 6 below).

The total reduction in Welsh Government funding via the MEAG and GT grants from 2013/14 to the notional proportions going into the EIG in 2015/16, was 2.67m. Even if PDG funding and the initiatives it pays for were to be considered as a substitute for the MEAG and GT Grant provision, which they should not be, the shortfall is still approx. £1.93m.



The numbers of GRT pupils used in this calculation are based on the official PLASC figures provided by the Welsh Government. There is a considerable disparity between the smaller official PLASC figures for GRT pupils and the larger figures provided in FOI returns and by LAs for GT Education Grant applications. The latter include CYP on roll, recorded on SIMS, not on roll, not recorded on SIMS, and not in school but in need of off-site support. CYP who are eFSM, who have moved from another school or were not on the school roll in the previous academic year will not attract PDG funding and those who move to another school during the year or the following year do not take the money with them.

Crucially, there is no guarantee that PDG money will be used to target the specific needs of small numbers of pupils in individual schools, such as GRT pupils, in the most effective way. If the pupils are EU Roma, they may also have language development needs which require specialist support. Current GT and some MEA services employ staff members to work with communities, families and pupils in and out of school. This kind of work does not fit well within the eligible uses of the PDG, for example paying for an outreach/liaison worker.



Concluding points

A mistaken assumption has been presented about the PDG initiatives meeting all pupils' needs

It appears that an assumption has been made that the kind of initiatives funded by the PDG will be the right kind of educational interventions to address the needs of EAL/WAL, GRT and other underachieving minority ethnic pupils. The key question is not about whether pupils are benefiting proportionately or 'disproportionately' from a specific fund but *whether or not they are getting the most appropriate kinds of provision to address their needs.*

A proportion of early stage EAL/WAL pupils do not generate PDG for schools

Many pupils of the Any other White background (which number over 10,500 in 2016 – approx. 2.6% of the pupil population – most of whom are from the EU), are early stage EAL/WAL learners who are not eFSM because their parents are earning above the threshold of household income for entitlement. *Such pupils do not attract additional PDG funding into their schools* and even if they did, the PDG is not intended to be used for direct EAL/WAL support, which the MEAG was used for.

It's not 'either/or'

If minority ethnic pupils are living in poverty they are fully entitled to funding targeted at addressing the impact of poverty. If they are not proficient in English/Welsh, they are entitled to funding to address that need. If they have an ALN, they are entitled to funding to address that need, and so on.

It is not EITHER/OR. Despite the Welsh Government's assertion to the contrary, it is clear that *funding has been diverted from minority ethnic pupil support into other areas of provision* which may not address their full range of needs in the most appropriate ways.

CYPE Committee: Suggestions for the Future

Education Provision for Gypsy, Roma and Traveller and Minority Ethnic Children and Young People in Wales

Jonathan Brentnall

INTRODUCTORY COMMENTS

The evidence presented to your inquiry indicates that at least four levels of decision-making are implicated in the changes impacting on provision for GRT and minority ethnic CYP.

1. The **Welsh Government** was directly responsible for the initial decisions to reduce funding and change policy without a rigorous Equality Impact Assessment or public consultation.
2. Within the new model of working, **consortia and local authorities** have made decisions about prioritisation, structure of provision and funding for these areas, some having more impact than others. It is not clear how much public consultation or Equality Impact Assessment they have done.
3. With greater delegation to schools, **headteachers** are making various decisions about how to spend their money, employ or allocate staff and prioritise resources. This does not seem to be being monitored by local authorities or consortia.
4. As an independent inspectorate, **Estyn** makes decisions about the areas prioritised for inspection (led by Ministerial remit), about how its inspectors are trained, and about the level of detail and rigour with which they inspect and follow up on recommendations in these areas of provision. Estyn's role impacts on the priorities of the previous three decision-makers but it appears they are largely unaware of what is actually happening on the ground and lack expertise to offer incisive advice.

The evidence suggests that:

- The Welsh Government did not follow its own protocols for compliance with the Equality Act 2010.
- Funding has been directed away from specific issues of minority ethnic achievement, EAL/WAL and GRT engagement and attainment into a 'narrowing the poverty gap' agenda.
- Funding cuts have disproportionately impacted on BAME staff in education amounting to what is potentially indirect racial discrimination.
- WLGA, consortia, local authorities and some headteachers want more money and control devolved to them with fewer stipulations so they can determine the course of their own 'local' education agendas.
- Service and project leaders, such as Martin Dacey and Trudy Aspinwall, showed the greatest insight into what CYP's needs actually are on the ground, in contrast to other witnesses who presented broad, vague or institution-focused arguments.
- There is a clear lack of accountability and lack of coherence in the structure of provision
- The increasing variety of models being employed by consortia and local authorities is unlikely to bring about greater consistency of good practice and a more holistic and coherent approach for Wales is needed to ensure high quality provision for these groupings of CYP in future.

FINDING A WAY FORWARD

Finding a way forward from this inquiry could be guided by three simple questions:

- **Where do we want to be?**
- **Are we there now?**
- **What's the best way to get there?**

Where do we want to be?

All education workers, from Welsh Government policy-makers, to Estyn inspectors, to teacher trainers, Consortium leaders, education directors, governors, headteachers, teachers and school non-teaching staff need to:

- know a lot about the diverse population of Wales;
- understand the needs that arise out of the varied identities, capabilities, experiences and circumstances of the diverse pupil population;
- be equally committed to addressing those needs, working to a common vision of equality and rights;
- be adequately equipped with the best practices and resources to address those needs by working together and sharing information and expertise.

Are we there now?

No. Not everyone working in education in Wales shares the common vision of a diverse nation, forging its identity in an interconnected global marketplace, based on firm commitments to equality and human rights.

Not everyone shares a common understanding of what the UNCRC rights mean in respect of the various identities, capabilities, experiences and circumstances of CYP in Wales.

Not everyone understands the variety or significance of needs arising from the diversity of CYP in our population.

From top to bottom, the education workforce is not currently well-equipped to address the needs or share expertise. There are pockets of good practice but these are not uniform or widespread.

What's the best way to get there?

Do not return to the past

My personal view is that it would not be the best decision simply to return the MEAG and GRT Grant arrangements to the way they were before their amalgamation into the EIG because that situation perpetuated marginalisation of specialist expertise and side-lined minority ethnic achievement issues in mainstream education policy and delivery.

Do not follow England

The evidence from England since moving away from dedicated, ring-fenced funding with little accountability is that the quantity and quality of provision for pupils in these areas has deteriorated. More recently, as schools have realised they lack the knowledge and expertise to meet the needs of some of their minority ethnic learners, they are increasingly:

- looking for specialist input to raise their skill levels and meet pupils' needs;
- buying in unqualified or inadequately trained staff, often on short-term contracts or through agencies;

- paying large sums of money for independent consultants, or ‘quick-fix’ commercial literacy interventions which are not always appropriate or as successful as they claim;
- giving responsibility for supporting EAL/WAL pupils to Literacy teachers, English teachers, SENCOs and others with little previous training or expertise.

Based on the feedback from professional colleagues, the various semi-commercial models experimented with in England have not been as functionally successful as the models where local authorities have invested in maintaining a central service to ensure that there is a fairly secure level of expertise regularly accessing schools and supporting pupils.

The current funding mechanism in England offers schools a minimum EAL factor amount per student of £466 in Primary and £1130 in Secondary (in 2015/16), but only for pupils who have arrived in the UK in the past three years. This funding is not obligatory, nor is it accompanied by an accountability framework. Experience in this field has shown that ensuring successful outcomes for EAL/WAL learners depends on them mastering the complexities of academic language required to get the higher grades in GCSE and A levels, and this can take from 4 to 10 years, dependent on other factors such as age, first language literacy levels and previous education. A narrow focus on early stage EAL/WAL learners will not address the needs of more advanced learners working towards the C grade borderline, so restricting funding to just recent arrivals would be unhelpful in raising overall outcomes.

In Wales, Swansea’s Minority Ethnic Achievement Service has progressively shifted its emphasis from working directly with early stage learners to capacity-building and targeting support for more advanced EAL/WAL learners in years 2, 6, 9, 10 and 11. Although their demographic profile differs from Cardiff and Newport, Swansea has sizeable numbers of pupils from traditionally low attaining sub-groupings and several of their outcomes outstrip those of Cardiff and Newport.

Outcomes, Processes and Needs

Outcomes give you a picture of how schools, authorities and the nation are doing over a period of time. These data are important and must be considered as part of the picture to inform priorities and allocations of funding but to rely simply on outcomes (especially just academic outcomes) is simplistic and misses other important dimensions of education provision.

Outcomes happen as a result of the processes of teaching, learning and support that are provided for CYP. If the processes are right, using the best practices, with high quality teachers and a strong pastoral system, engaging and guiding CYP in a safe, supportive environment, then better outcomes usually follow.

Of course, the diversity of cohorts between and within schools, and the extent of their needs, have a substantial impact on the relative success of particular processes and ultimately on outcomes, so the particular needs of individuals within cohorts must be factored in from the start to shape the processes and tailor them most appropriately. Data clearly show that EAL/WAL pupils, and many other minority ethnic learners from a range of backgrounds make very good progress as they learn the languages and are enabled to demonstrate their potential. Their early difficulties may not show up in outcomes because of disapplication or the time-lag before end of key stage assessment. These groupings of learners are worth investing in to get a good return and raise the overall picture of outcomes in the long-term but you will only know how to allocate or differentiate provision based on an assessment of needs.

Success with GRT pupils is clearly linked to long-term trusted relationships being built up with key workers and schools. The entire ethos of schools and attitudes of teachers, CYP and their parents needs to be improved to make GRT pupils feel safe, welcomed and valued in Wales and in the education system. The particular combinations of needs of these groupings must be addressed in a more discerning way than just focusing on outcomes and delegating money to schools.

Of course, these approaches cost money and it is entirely valid to consider the impact of funding constraints on education as a whole but the more important question is about the capacity of the education system to accurately and explicitly identify the needs of all groupings of learners, where those needs pertain to educational engagement, enjoyment and achievement and to invest in the approaches which yield results in terms of attainment *and* inclusion.

A great deal remains to be done to ensure that the moves forwards are going to be of the greatest benefit to children and young people of minority ethnic, Gypsy, Roma and Traveller backgrounds.

Below is a set of 23 recommendations that address the spectrum of issues raised by this Inquiry to rectify past inequities and set a course for a more productive future. They cover **Strategy, Funding, Organisation of Provision and Targeting, Training and Capacity-Building** and **Equality Compliance**.

RECOMMENDATIONS

STRATEGY

- 1. Appoint an experienced, knowledgeable expert to take a strong lead in the Welsh Government to develop a clear strategy and to drive the elements of GRT, minority ethnic and EAL/WAL provision through all the developing education initiatives in Wales.**

The Welsh Government has never had a strong high level advocate for these areas and the small branch allocated with the responsibility for administering the MEAG and GT Education Grant has suffered from a succession of short-term lead officials with little or no background in these fields, who have found it very difficult to exert influence at higher levels.

- 2. Commission a team of experts from England and Wales to work with WG and LA officials on developing clear stranded elements within the new national curriculum and main education initiatives that explicitly address the issues and needs of GRT, minority ethnic and EAL/WAL CYP.**

Wales alone does not have enough independent experts with the broad overview of education policy and practice to address all of these issues. However, a team could be put together for a time-limited period to work with the strategic lead to guide officials and incorporate these strands as integral components of Wales' developing education system. Something similar was done in the National Strategies in England, for the London Challenge and by the British Council in its recent EAL Nexus project. The length of time such a team should operate would need to be reviewed against sustainability of impact.

- 3. Develop good practice guidance for schools, with exemplars, for each of the strands making it clear that implementation is the responsibility of *all* education professionals working in partnerships.**

During the late 1990s and 2000s in England, a quite a lot of specific guidance and good practice advice was produced by specialists for these areas of work and linked to training, contributing to the success of initiatives like the London Challenge (See Rec.4). They formed part of the whole thrust towards improving standards. A similar raft of guidance is needed in Wales.

- 4. Ensure that decisions made about these areas in the future education system and curriculum for Wales are well-informed by expertise from practitioners and consultation with pupils, parents and relevant academics.**

Going into the future, a change in process is needed to ensure that decisions are cognisant of grassroots knowledge and stakeholder insight. It is simply not adequate to rely on social researchers carrying out literature reviews, Estyn doing inspections or policy-makers talking to general education leaders. It may be worth revisiting the ECD group model of networking to maintain engagement during the early stages of decision-making.

- 5. Give these areas of work comparable status with other types of provision, recognising that work with EAL/WAL, GRT and other minority ethnic CYP are areas of distinctive, specialist knowledge and expertise within education, comparable to working with ALN/SEN pupils, teaching a secondary curriculum subject or being a Literacy adviser.**

These areas of provision have not been fully recognised as a core part of what education in Wales is about, and have often been regarded as marginal or someone else's issue for several reasons including:

- lack of understanding amongst decision-makers at several levels;
- political sensitivities around race, religion and language;
- perceptions of demographic differences around Wales;
- the CYP being served constituting a minority of the total population;

- specialist services being perceived as separate and additional rather than as equal partners in delivering core services;
- the broad range of issues involved in minority ethnic and GRT achievement which cut across several areas of provision for CYP;
- lack of knowledge about the nuances of cultural integration and additional language development in the context of learning the school curriculum.

Provision for CYP of GRT and minority ethnic backgrounds should be accorded equal status alongside other elements in education and this status should be clearly affirmed in relation to all schools, especially now that almost 90% of schools in Wales have at least one minority ethnic pupil on roll. If WG does not prioritise these areas of provision and write them explicitly into strategies for all schools to follow, with accompanying guidance on good practice, capacity will not be built.

FUNDING

- 6. Restore the dedicated funding to at least 2013/14 levels, by taking back some of the money that was diverted into the PDG and putting it into three clear strands for GRT, EAL/WAL and other issues impacting on minority ethnic CYP, including asylum seeker and refugee children.** Funding for these areas of work needs to be significantly increased to recoup the progressive erosion of per head amounts over several years. At a minimum, it should be restored to at least the levels of 2013/14, because even those funding levels were below what is needed to maintain support for CYP and build capacity in schools. Based on the average per pupil allocations of 2009/10, matched to current pupil numbers, the MEA element would stand at approx. £14.9m and the GRT element at approx. £1.3m from the Welsh Government with Consortia or Local Authorities able to vire additional funding where they perceive more is required to meet needs. Some form of negotiated evaluation of a fair amount of funding for each strand is required, involving service and project leaders who are aware of needs across their authorities.
- 7. Clarify the location of the three strands within Education Improvement** Ultimately, these areas of provision are about improving standards of education provision. Some of the responsibilities extend beyond schools (especially those for GRT pupils) but in terms of policy they are currently located under Support for Learners in the Welsh Government. The new location of the funding under the EIG is preferable from an ideological point of view but as this grant is being progressively reduced, possibly with a view to phasing out in the future, and there is no ring-fencing, the current situation is far from ideal. There does not appear to be a coherent structural model linking policy, funding and delivery for the Education Improvement Grant with the other structural components of education strategy and this lack of clarity should be addressed. For now, these areas of funding should probably stay within the EIG but as ring-fenced strands with boosted amounts, until a review is carried out.
- 8. Ring-fence funding to prevent erosion or diversion of monies to other areas** Whichever grant stream is used and whether funding is administered centrally or devolved to schools, it *must* have some form of ring-fencing and close accountability otherwise there is no guarantee that it will be spent specifically on meeting the needs, and raising the attainment, of minority ethnic, GRT and EAL/WAL learners. There has to be transparency about expenditure. Ideally, there would be explicit strands within a wider education funding stream, with freedom for consortia, local authorities or schools to supplement funding from other sources, but ring-fencing is required to prevent erosion of targeted funding in these areas as we have seen in England over the past 6 years and already in Wales over the last two.

9. Link future funding to numbers and needs.

Future funding must be linked to numbers and identified needs, so that increases or indeed decreases can be adapted to, not driven by political agendas but by the best interests of the CYP affected. Funding must be set at a minimum level that will allow local authorities or collaborative services to operate a functioning advisory team to deliver CPD and build capacity at SMT and teacher levels, and to provide additional specialist teachers and teaching assistants to meet pupils' needs where expertise in schools is lacking.

10. Set up a working group to develop a simple mechanism for allocating funding in each of the three strands and detail a set of accountability measures for its use.

Up to now, all discussions about accountability mechanisms and outcome measures have been conducted at very senior levels and apparently made little progress in over two years. The working group must involve EMA and GRT service leads who understand what is meaningful, realistic and practicable in terms of tracking, monitoring and accountability. They or their predecessors have been the ones responsible for gathering the data, allocating the funding and submitting bids over the past 16 years.

11. Guarantee a level of stability by awarding funding on a three to five year basis.

For many years, the lack of job security and guaranteed funding in these areas of work has been a constant concern, leading to a drain in good quality teachers. In the last few years, several experienced practitioners have left the profession. To attract and retain high quality staff, and to drive through successful improvements in capacity-building and CYP support, an amount of funding must be guaranteed for a number of years.

ORGANISATION OF PROVISION AND TARGETING

12. Explore different models of collaborative working between local authorities

The working group involving relevant professionals in the fields needs to explore different models of working collaboratively between or across local authorities. This does not have to follow the GEMS model of simply buying-in to a service led by another authority because this tends to shift ownership away from each local authority. Rather, it should look at ways in which locally-focused services can be co-managed, co-ordinated and share resources to address changing needs. If the Council reorganisation goes ahead, this will have to happen in some form anyway. Any suggested models should take account of and not pre-empt a Council reorganisation. However, to maintain quality staff, there must be some internal management structure providing opportunities for promotion.

13. Target funding and provision more precisely

Data at *national, regional and local* levels need to be used to inform decisions about targeting funding and provision. Leaving this simply to local level priorities may not pick up on small numbers of isolated individuals who are under-attaining but, when they are combined with small numbers from other schools and authorities, they contribute to a larger picture of attainment. This is especially true of Black and Mixed ethnicity pupils who, aside from concentrations in a small number of inner city schools, are quite widely dispersed in comparatively low numbers in other schools across Wales. There are several ethnicity sub-groupings whose attainment figures are below national averages. These need to be highlighted at national and regional levels and targeted at local levels. It makes no difference whether the borders are drawn around 22, 8 or 4 regions, local data aggregate to regional data, which aggregate to national data, it's just about discerning what is most relevant where. If data are shared, the picture of need should be clear to all.

- 14. Use more refined ethnicity and first language sub-categories for recording and analysing data (e.g. those within the Black African, Any other White and Any other ethnic backgrounds) to better identify the needs of groupings within those categories such as Somali, Yemeni, Portuguese and Filipino.**

The more you subdivide data categories the smaller the cohorts become until figures become too small to be publicly disclosed. However, these figures can be used internally to identify need and allocate support. Every individual counts, and being alert to the fact that each child is part of a larger community with a particular pattern of educational access or attainment can focus attention more clearly on giving appropriate support to each child.

TRAINING AND CAPACITY-BUILDING

- 15. Use the expert team (See Rec. 2) to train advisers in the most relevant research, best quality approaches to school improvement and the practical guidance developed for schools.**

A crucial element of both the National Strategies and the London Challenge, associated with strong results amongst ethnic minorities in their aftermath, was the commitment and time devoted to training and upskilling staff, delivered by experienced practitioners and trainers. With current levels of knowledge and expertise amongst general school staff in schools in Wales, the advocated model of school-to-school sharing could become more of a dissemination of ignorance than of expertise.

- 16. From within the pool of local authority advisers build a national team or regional teams of trainers to disseminate good practice and coaching to school clusters throughout Wales going into the future to make the drive for improvement sustainable.**

Recognising that the employment of a specialist team is likely to be short-term for financial reasons, to make improvements sustainable, a team of long-term employed advisers needs to be utilised to continue dissemination of good practice by coaching through national or regional models of education improvement. This may be akin to the kind of advisers in Cardiff and Swansea but there is no set of similar advisers working across other authorities. Such a team must have status and be given time to work with schools and individual staff members, not simply to deliver one-off training.

- 17. Ensure that the revamping of Initial Teacher Training brings about more robust input and greater consistency in the delivery of these elements across ITT institutions.**

The British Council report on EAL in ITT in Wales found considerable inconsistency and variable levels of coverage of the QTS standards on diversity and EAL/WAL. This needs to be addressed as part of the review of ITT.

- 18. Establish an accredited national qualification for teachers and for bi/multilingual teaching assistants to follow onsite or via distance learning, on working with learners from diverse ethnic, religious and linguistic backgrounds.**

Some courses have been developed in Wales in the past and other distance learning courses are available in England, but uptake has been largely limited to specialist workers employed by central teams. Raising the status of these areas of work and highlighting the importance of further professional development, with targeted marketing, could make such courses more sustainable in Wales. Nationally recognised qualifications for teachers and TAs could be delivered collaboratively in a joint venture between the HE institutions in Wales, sharing expertise through a mixture of direct, virtual and distance learning inputs.

- 19. Use specialist peripatetic and school-based staff to help build capacity in schools through greater involvement in planning and partnership working with class teachers.**

The most successful model of capacity-building at classroom level has been that of joint or partnership working between specialists and class teachers, in which both parties benefit from each other's expertise in planning and delivery. This model was first promoted in the early 1990s and those who have followed it have found it to be productive. However, marginalisation of these fields of provision has meant that too often in schools, the specialist staff members have been told to sit with the children and work with them alone, rather than develop equal co-working to produce a more inclusive whole-class and whole-school environment. Recent reductions in experienced staff and devaluation of their specialist skills mean this type of working has been further marginalised. Partnership working should be viewed as the norm.

20. Utilise a 'ladder of support' model to ensure fair allocations of provision matched to need

Linked to capacity-building, there needs to be some evaluation of the scale of support required. As schools become more skilled and self-reliant on their own increased capacity, they will need progressively less external input but this requires robust evaluation which can be monitored through advisers and central team oversight. Relying on Estyn for this type of evaluation is not sufficient. The team of advisers (suggested in Rec 15 and 16) in conjunction with local authority service leads and specialist staff working in schools could be well-placed to carry out this kind of supportive evaluation.

21. Each school with a BAME, GRT or EAL/WAL CYP should have a designated person with responsibility for overseeing their care and provision

Recognising that there are far too few specialist staff employed to work with minority ethnic, GRT and EAL/WAL CYP across all schools, there is a need for each school with such a pupil on roll to have a designated person with responsibility for: advocating for those CYP's needs; for keeping up-to-date with developments in the field (perhaps through membership of professional associations and networks); for participating in training and building capacity in their school. Every single CYP matters, so even a school with just one learner should have a named person. The role should be given to those who have a genuine interest in advocating for these pupils and have a strong commitment to equality, not simply to SMT or teachers wanting an extra point on their salary scale.

EQUALITY COMPLIANCE

22. Commission an independent review of the extent to which the Welsh Government has complied with its statutory duties under the Equality Act 2010 and followed its own protocols in respect of the funding and policy decisions affecting the MEAG and GT Education Grant between 2013/14 and 2015/16.

23. Review the Welsh Government's approach to inclusive-policy-making to ensure that Equality considerations are made at the outset of design, not towards the end or after the policy has been implemented.

The Achievement of Ethnic Minority Pupils in Wales, 2003

<http://gov.wales/docs/dcells/publications/121119ethnicminoritypupilsen.pdf>

Recommendations from Section 1, page 9

- Monitoring of achievement by ethnic background must be carried out by all schools in Wales to ensure that the attainments of pupils from different ethnic backgrounds can be identified at each Key Stage and tracked over time.
- Future research on ethnic minority achievement should focus on pupils from distinct ethnic backgrounds rather than regarding all ethnic minority pupils as belonging to a single homogenous group. Socio-cultural and linguistic differences must be taken account of.
- All authorities with responsibility for education in Wales, including the Welsh Assembly Government, the Qualifications, Curriculum and Assessment Authority, Estyn, Local Education Authorities and Schools must make a high priority of raising the achievement of ethnic minority pupils in order to address the inequalities which currently exist.
- Specific training, staffing, strategies and initiatives must be put in place and adequately funded.

Recommendations of the full report, pages x-xii of the Exec Summary

Ethnic monitoring

- The Welsh Assembly Government should monitor attainment and other data impacting on attainment at a national level by ethnicity and gender
- LEA information officers should monitor the data available to them through SIMS by ethnicity and gender
- All schools should monitor attainment and other aspects of school life which impact on attainment by ethnicity and gender
- Annual targets for ethnic minority achievement should be set by the Welsh Assembly Government, all LEAs and all schools with ethnic minority pupils
- Strategies should be put in place to address underachievement of identified groups and individuals
- LEAs should give school advisers and advisory teachers responsibility for monitoring ethnic minority achievement and strategies used in schools
- Estyn should include reference to attainment by ethnicity and gender in all school inspection reports

EMAG and meeting needs

- EMAG funding should be increased to match the increased need identified through recent ethnic monitoring
- EMAG should be removed from GEST and administered as a formula-based standalone grant in a way that allows stable, longer term funding to be provided – this is essential for increasing the status of EAL/EMA support and for attracting and retaining quality staff
- Monitoring the use of EMAG funds should be carried out annually
- The focus of EMAG funding should be widened to target other issues of achievement as well as EAL
- Specific projects should be considered focusing on groups with particularly significant achievement needs such as Somali, Yemeni and Black Caribbean pupils

Training

- All Initial Teacher Training, Continuing Professional Development, Headteacher and Senior Management training courses should include compulsory elements on meeting the needs of ethnic minority pupils and those for whom English is an additional language
- Estyn should inspect the quality and standards of training offered on these courses
- An extensive and ongoing national programme of training implemented through LEAs should be established for mainstream staff and senior management in schools on the following: Race equality, cultural diversity, meeting the needs of ethnic minority pupils, English as an additional language acquisition, supporting higher stage EAL learners and dealing with racist incidents
- Multiethnic schools should consider using one of the 5 mandatory INSET days per year to address issues relating to race, diversity, equality and EAL
- LEAs should provide ongoing support for schools through their advisers and regular training courses

Professional qualifications

- Higher education institutions should be encouraged to develop a range of qualifications for bilingual assistants and teachers to raise the status and level of professionalism of practitioners in the field of EAL/EMA in Wales
- A recognised professional teaching qualification specialising in EAL/EMA should be established

Ethnic minority and community language teachers

- The General Teaching Council for Wales should monitor the teaching force by ethnicity and create initiatives to encourage more people from ethnic minority backgrounds to enter the profession. Job shadowing should be used as an intermediate strategy
- Incentives should be offered to encourage more people to become teachers of community languages

Dealing with racism

- Schools should assess and find out about the levels of racism in their schools by consulting with pupils, parents and teachers
- Clear and appropriate policies and procedures to follow in dealing with racist incidents should be implemented in all schools
- Training on dealing with racist incidents should be provided for all teaching and non-teaching staff
- Levels of racist incidents should be monitored and reported to the LEA
- Estyn should include reference to the way schools address racism in all school inspection reports
- ACCAC should ensure that addressing racism is explicitly included in revisions of the PSE Framework

Pupil profiling

- Schools should collect a range of detailed and specific information on admission about ethnic minority pupils' backgrounds, home languages, time in UK, previous education, parental languages and levels of literacy as well as recording baseline, EAL stage and other assessment information
- This pupil profile information should be shared with class teachers to inform their teaching and pastoral support

EAL/EMA support

- Schools in receipt of EAL/EMA support should make every effort to include support staff in joint planning and make time for liaison between mainstream and support staff
- Partnership teaching between mainstream and support staff should be encouraged as a model of good practice
- Strategies and approaches should be flexible and tailored to the needs of individual pupils

Attendance

- Schools should monitor attendance by ethnicity and be effective in communicating to parents their expectations for attendance and punctuality
- Schools must be proactive in working with parents to minimise the potential disruption to children's education of prolonged absences. Dialogue must be promoted about timing, length of visit, provision of work for pupils and arrangements to catch up with missed work on return. This is particularly needed within the Indian subcontinent and Arab communities in Wales
- The Welsh Assembly Government should consider producing guidelines on extended visits to families' countries of origin. These should be translated into the relevant community languages

Encouraging participation

- Schools should be proactive in negotiating alternative approaches to encourage greater participation by ethnic minority parents. This is particularly the case for secondary schools and schools whose pupils live some distance from the premises
- Alternative timings of parents' meetings should be considered
- Schools should set targets specific to ethnic minority parental inclusion where involvement is low

Communication, translation and interpretation

- Schools should know the literacy levels of their ethnic minority parents in home language and English/Welsh and should ask them whether or not they would like translation and interpretation to be used
- Translation and interpretation should be provided wherever it may be useful to promote effective communication with parents. Schools should not rely on children or siblings to interpret for them unless this is unavoidable

- Traditional methods of school communication such as letters may not be appropriate for some parents. Where this is the case schools should explore alternatives such as personal contact, phonecalls or even the use of cassettes and videos in the relevant languages to inform parents of what is happening in the school, when and how they can be involved

Home languages

- Bilingualism and multilingualism should be encouraged and supported to enable pupils to reach high standards of oracy and literacy in English/Welsh and their home languages
- Where possible pupils should be sensitively encouraged to use their home languages in class discussions, and as part of their daily working
- Schools should work together and with the community education sector to offer more pupils the opportunity to study community languages to GCSE

Joint working to tackle social disadvantage

- Different governmental and local authority agencies should work together to address issues of social disadvantage, supporting communities in overcoming the barriers they face
- Careers Wales should develop and offer culture-sensitive advice to specific ethnic minority communities where unemployment is high such as the Somali community in Cardiff or where experience of varied careers is less common such as the Bangladeshi community in Swansea

Adult education

- Adult and community education should work together with Careers Wales, ESOL, LEA officers and schools to build partnership learning for families. Existing schemes for family literacy should adapt to the needs of the families particularly by offering support to mothers in both English and home language
- ESOL and family literacy schemes should consider broadening the support offered beyond basic literacy activities to include learning about school and how to help children develop academically

Inspection

- In all schools with ethnic minority pupils on roll, Estyn should inspect and report on standards of provision for these pupils and the strategies which are used to raise achievement
- In all schools with EAL pupils on roll, Estyn should inspect and report on standards of provision for them across the curriculum and the life of the school
- Estyn should include reference to the way schools address race equality and cultural diversity in all school inspection reports. These themes should be evident as strands running through all reports

A culturally diverse curriculum

- ACCAC should implement the commitment of the NAFW Equal Opportunities Group's response to the Stephen Lawrence Inquiry to revise the 2005 national curriculum to promote race equality and cultural diversity
- In delivering a culturally diverse curriculum and the Cwricwlwm Cymraeg, the nature of 'Welsh' as a multiethnic identity should be promoted

Assessment

- National moderation of EAL assessment should be carried out annually
- School level assessments of ethnic minority pupils should be made more culturally appropriate. Reliance on national standardised tests may only serve to reinforce a deficiency model
- Consideration should be given to a more detailed consistent set of assessments which will track EAL pupils' progress along recognised EAL pathways and can be used both diagnostically and formatively alongside the national curriculum and the national EAL 5 stage model

Future research

- Future research on the needs of ethnic minority pupils should consider different ethnic groups independently of one another rather than regarding all ethnic minorities as a single homogenous group
- Specific research should be commissioned on the needs of Roma Gypsy and Traveller pupils
- Further research is required on the achievement of unsupported ethnic minority pupils in Wales
- Additional research is required on the achievement of ethnic minority pupils in Welsh-medium and bilingual Welsh-English schools