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Children, Young People and Education Committee
Inquiry report into the Education
Improvement Grant: Gypsy, Roma and Traveller, and Minority Ethnic Children

February 2017



Children, Young People and Education Committee

The Committee was established on 28 June 2016 to examine legislation and hold the Welsh Government to account by scrutinising its expenditure, administration and policy matters, encompassing (but not restricted to): the education, health and well-being of the children and young people of Wales, including their social care.

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01. Background

Our inquiry

- 1. In October 2016, the Children, Young People and Education Committee decided to hold a short, focused inquiry into the impact of the Welsh Government's amalgamation of previously ringfenced grants into the new Education Improvement Grant on Gypsy, Roma and Traveller, and Minority Ethnic children.
- 2. The Welsh Government introduced the new funding arrangements for the financial year 2015-16 onwards, merging 11 individual grants that were previously paid to local authorities for specific purposes. Two of those grants were the Gypsy Children and Traveller Children Education Grant, and the Minority Ethnic Achievement Grant.¹ The EIG is administered by the four regional consortia, through which local authorities share their school improvement services.
- **3.** During the course of the inquiry, the Committee received **28 written submissions** and held evidence sessions with **9 organisations** including the Cabinet Secretary for Education. The consultation period ran from **Monday**, **17 October 2016 to Friday**, **18 November 2016**.
- **4.** The Committee intends to review progress by the Welsh Government on this issue in the near future.
- 5. The Committee would like to thank all those who took the time to contribute to this inquiry by providing evidence. A list of those who gave oral and written evidence is included in Annex A.

Terms of reference

- **6.** The Committee decided that the overall aim of the inquiry would be to consider the impact of the new grant funding arrangements on Gypsy, Roma and Traveller, and Minority Ethnic children and young people. The inquiry focused specifically on the impact on their educational outcomes and adopted the following Terms of Reference:
 - how the Welsh Government monitors the way local authorities use the Education Improvement Grant and how the new, amalgamated grant supports Gypsy, Roma and Traveller, and Minority Ethnic children, with specific reference to improving educational outcomes;
 - the effectiveness of other Welsh Government policies and strategies for supporting the education of Gypsy, Roma and Traveller, and Minority Ethnic children; and
 - any key issues arising from amalgamating the other previously separate grants into the Education Improvement Grant.

Why the Committee has looked at this issue

7. When scrutinising each of the Welsh Government's budgets for 2015-16 and 2016-17 in the Fourth Assembly, the previous Children, Young People and Education Committee expressed concerns about the potential impact on Gypsy, Roma and Traveller, and Minority Ethnic learners as a result of

¹ The other grants amalgamated were the Foundation Phase Revenue Grant; School Effectiveness Grant; 14-19 Learning Pathways; Welsh in Education Grant; Lead and Emerging Practitioner Grant; Reading and Numeracy Test Support Grant; Additional funding for Band 4 and 5 schools; Teacher Induction; and the Higher Level Teaching Assistant Grant

the amalgamation of the grants. The previous Committee reported in January 2016 that the Welsh Government was not able to "ensure that the objectives of the original grants are being delivered".

- 8. Some stakeholders called for this issue to be the subject of an inquiry during a **consultation the Committee held in the summer of 2016**, which sought views on what its priorities should be during the Fifth Assembly.
- **9.** Gypsy, Roma and Traveller children have the lowest attainment rates of any ethnic group in Wales. When the Committee decided to undertake this inquiry, the latest data available (2013-2015) showed that 15.5% of Gypsy/Gypsy Roma pupils achieved the Level 2 threshold inclusive (5 or more GCSEs at grades A*-C including English/Welsh and Mathematics). This compared to 56.0% of all pupils and 27.8% of pupils eligible for free school meals (eFSM),² which is the Welsh Government's proxy for identifying disadvantaged children.
- **10.** The Welsh Government published **updated statistics** on 31 January 2017. The results were more encouraging with the proportion of Gypsy/Gypsy Roma pupils achieving the Level 2 threshold inclusive during the 2014-2016 period rising to 24.4%. The rate for all pupils also rose to 59.0%, meaning the attainment gap between Gypsy/Gypsy Roma pupils and their peers narrowed from 40.5 percentage points to 34.6. The gap with eFSM pupils reduced from 12.3 percentage points in 2013-15 to 7.2 in 2014-16.³ The Committee welcomes this progress although the gap between the attainment of Gypsy, Roma and Traveller learners and other pupils remains unacceptably wide.
- 11. Interpreting the data on attainment of Minority Ethnic children is more complicated. These learners are less of a homogenous group and attainments rate vary significantly across different ethnic groups. Mixed ethnicity White and Black Caribbean (47.4%), Black Caribbean (40.0%) and Black African (55.4%) pupils have particularly lower rates of attainment of the Level 2 threshold inclusive in 2014-2016 than the average for all pupils (59.0%). However, other minority ethnic groups outperform their peers.
- 12. There is often a balance to be struck between the advantages and flexibility of general, unhypothecated financing of local government and the desire to ensure funding that is intended to support specific national priorities is in fact used to these ends. The Committee felt it was timely to scrutinise the impact of the Welsh Government's decision to no longer ring-fence funding to support the educational outcomes of these groups of learners, instead financing these activities from a larger grant which is also used for other purposes.

² This is the 2014 eFSM rate. This is used for the purposes of comparison as the latest Gypsy/Gypsy Roma attainment data is aggregated over the three-year period 2013-2015.

³ Based on the 2014 and 2015 eFSM rates respectively.

02. Recommendations

Recommendation 1. The Welsh Government should keep under review the best
model for funding activity to support the educational outcomes of Gypsy, Roma
and Traveller, and Minority Ethnic learners. It should revisit this question later in
the Fifth Assembly and consider whether the introduction of the Education
Improvement Grant has improved outcomes for these groups of learners. In the
meantime, the Welsh Government should improve its monitoring and evaluation
arrangements for the Education Improvement Grant through the courses of
action set out in recommendations 2 to 7 and address this overarching
recommendation by the end of 2020 Page 14
Recommendation 2. The Welsh Government should review the arrangements it
has put in place to monitor the use of the Education Improvement Grant and
evaluate its impact, specifically in relation to the educational outcomes of
Gypsy, Roma and Traveller, and Minority Ethnic learners Page 25
Recommendation 3. The Welsh Government should take a more strategic lead in
providing guidance on how the Education Improvement Grant should be used to
benefit Gypsy, Roma and Traveller, and Minority Ethnic learners Page 25
Recommendation 4. The Welsh Government should urgently review the
effectiveness of the education performance framework it is expecting regional
consortia and local authorities to use to evaluate outcomes from the Education
Improvement Grant. The framework should make far more specific reference to
the intended outcomes for Gypsy, Roma and Traveller, and Minority Ethnic
learners so that all involved in providing services for these learners have a clear
understanding of what is expected from the Education Improvement Grant.
Page 25
Recommendation 5. The Welsh Government should provide greater clarity on
the specific role of the Welsh Government, regional consortia, local authorities
and schools in monitoring and tracking outcomes for these groups of learners.
Page 26

Recommendation 6. The Welsh Government should undertake a thorough, updated impact assessment of the decision to amalgamate the previous grants into the Education Improvement Grant from 2015-16, with specific reference to Gypsy, Roma and Traveller, and Minority Ethnic learners. This assessment

should have regard to the UN Convention on the Rights of the Child and the
Welsh Government's statutory responsibilities regarding children's rights and
equalities. The impact assessment should also consider how successful the
Welsh Government's action to mitigate any risks of negative impact from the
decision has been
Recommendation 7. The Welsh Government should remit Estyn to undertake a
thematic review of educational provision for Gypsy, Roma and Traveller, and
Minority Ethnic learners, providing an update on the position since its last
thematic report in 2011. Estyn's review should consider the impact of the new
funding arrangements since 2015-16 and also consider the wider issue of how
well the "middle tier" of education (regional consortia and local authorities)
monitor and evaluate outcomes for particular groups of learners. Estyn should
be remitted to undertake this review in 2017-18 or the earliest year in which this
is practical Page 26
Recommendation 8. The Welsh Government should work with regional consortia
and local authorities to gain a clearer understanding on how much funding is
being made available to support Gypsy, Roma and Traveller, and Minority Ethnic
learners. It should also consider the number of learners supported by this
funding, particularly in light of increases in asylum seeking and refugee children,
and provide the Committee with an assessment of per pupil funding levels.
Page 33
Recommendation 9. The Welsh Government should work with regional consortia
and local authorities to assess the impact of long-term funding trends and the
new grant funding arrangements on relevant service areas within local
authority Page 33
Recommendation 10. The Welsh Government should consider how more
reliable, accurate data on numbers of Gypsy, Roma and Traveller, and Minority
Ethnic learners can be recorded. The Welsh Government should ensure
allocations of the Education Improvement Grant in respect of these groups of

learners are based on the most up to date, reliable data. Page 33

03. The funding model

Ringfencing vs amalgamation

- 13. The Welsh Government made the decision to amalgamate 11 previously ring-fenced grants into one single grant, which it called the 'Education Improvement Grant' (EIG), during the budget setting process for 2015-16 in autumn 2014. At that time, the Welsh Government said "the new simplified grant system", would reduce administrative costs, and "should lead to more flexibility and ultimately better outcomes for learners".
- **14.** The Fourth Assembly's Children, Young People and Education Committee questioned the previous Minister for Education and Skills, Huw Lewis, on whether merging the grants posed a risk to any of the individual objectives. The then Minister said there would be efficiencies resulting from the "new simplified grant system" and the Welsh Government would monitor how local authorities deliver on their undertakings.
- **15.** However, as already stated, the previous Committee reported in January 2016 that "it is clear to the Committee that the Welsh Government cannot ensure that the objectives of the original grants are being delivered".
- **16.** The Welsh Government's position on the EIG has remained predominantly the same since Kirsty Williams became Cabinet Secretary for Education in May 2016. Her letter to the Committee dated 11 November 2016 referred to a need for increased financial flexibility and a general move towards increasing de-hypothecation of local government funding. She said "the EIG provided a means to support the regional delivery of school improvement services across Wales":

"The new arrangements were intended to simplify systems, reduce bureaucracy and enable a greater focus on achieving outcomes for learners with less resource spent on administering and managing the grants and less focus on recording the inputs and outputs at a national level."

- 17. The Cabinet Secretary also reported that a maximum of 1.5% of the EIG was permitted for administrative costs in 2015-16 and 1% in 2016-17. She compared this with some of the previous 11 grants which capped expenditure on administration at between 3% and 5%. Kirsty Williams said the administrative savings of the EIG have enabled regional consortia, local authorities and schools to offset some of the impact of overall reductions to the funding since 2014-15.
- **18.** When attending Committee, the Cabinet Secretary summarised the rationale of the EIG as follows:

"Some of the pots of money were relatively small, and if you distribute that on a 22-local authority basis, we're then talking about very, very small pots of money. The previous administration listened to the representations from local government that felt that, in some ways, they were being over-monitored for relatively small pots of money, whereas the vast majority of their education spend was subject only to Estyn and the level 2 plus indicator. So, I can understand the reason for doing it. It's also there to increase flexibility so that

⁴ Letter from the Cabinet Secretary for Education, 11 November 2016

individual regional consortia and individual local authorities can respond to the needs of their particular populations, which will differ hugely."⁵

- 19. The Welsh Local Government Association (WLGA) strongly supports moves towards dehypothecation. They therefore welcome the reduction in number of individual, specific grants, highlighting that between 5-10% of their value are "taken up by reporting, audit and administration costs". However, the WLGA believes that amalgamating a number of specific grants into a single larger grant such as the EIG "does not meet the needs of local authorities". The WLGA would like the Welsh Government to go a step further and transfer the EIG into the Revenue Support Grant (RSG). The Association of Directors of Education in Wales (ADEW) told the Committee that it is not "necessarily sensible to earmark a certain amount of money for a relatively small number of pupils".
- **20.** On the other hand, Dr Jonathan Brentnall, an academic specialising in the education of ethnic minorities and pupils with English as an additional language, commented that 50 years of dedicated government funding to support minority ethnic pupils and 40 years of dedicated funding for Traveller education has been 'brought to an end' by the cessation of the ring-fenced grants. He argued this reflects a 'deprioritisation' of support for these groups of learners.
- **21.** Dr Brentnall calls for a demarcation of funding into three clear strands for Gypsy, Roma and Traveller learners; those with English or Welsh as an additional language; and other minority ethnic children such as asylum seekers and refugees. He also advocates a return to some degree of ringfencing:

"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 [these groups of learners]."

22. Trudy Aspinwall from Save the Children's Travelling Ahead project, which works with young people from Gypsy, Roma and Traveller backgrounds, told the Committee:

"It really feels like it's a really bad time to take away a focus and a priority from gypsy and traveller education services. (...)

We're very concerned that those services won't be given the priority that they were before, that they will be against a background of general cuts, that they will not be prioritised and they will not be safeguarded."

- **23.** However, Ms Aspinwall added it could not be known whether the amalgamation of the grants into the EIG has had a negative impact, because the new arrangements are not being monitored properly. A lack of monitoring was a consistent theme throughout the evidence received during the inquiry.
- **24.** The majority of written responses to the Committee's call for evidence expressed concern over the amalgamation of the grants. Stakeholders were generally concerned that it would lead to a reduction in funding for Gypsy, Roma and Traveller learners and those from minority ethnic backgrounds or with English as an additional language.

⁵ Cabinet Secretary for Education, **Oral Evidence**, 12 January 2017

⁶ Jonathan Brentall, Education Consultant, Additional Written Evidence

⁷ Trudy Aspinwall, Save the Children's Travelling Ahead Project, Oral Evidence, 8 December 2016

25. Evidence from staff working within relevant local authority service areas generally called for a return to the ring-fenced grants. Martin Dacey, Head of Gwent Ethnic Minority Service (GEMS), which provides services for the five local authorities in South East Wales using their shared budget from the consortia's overall EIG allocation, said:

"I think it says a lot about the priority and the status of this funding... under the EIG, I do. I think the funding should be ring-fenced. I think it says a lot about the priority and the status of this funding." ⁸

- 26. Mr Dacey said he agreed with all of Dr Brentnall's evidence and analysis that the Welsh Government has 'deprioritised' this area. However he was not in a position to give the overall view of his local authority (Newport) or consortium on whether the funding should be ring-fenced or not. The Committee did not receive clear views on this question from the leadership of individual local authorities or the consortia, other than from the WLGA which welcomes the de-hypothecation of individual grants and would like the EIG to be transferred into the RSG. Other than ERW (South West and Mid Wales) the consortia offered little from their own perspectives. This is a key factor behind the Committee's recommendations on monitoring.
- 27. The evidence from local authority service areas, which the consortia passed on, suggested there has not been any substantial change in provision as a result of the introduction of the EIG. For example, the Central South Consortium has essentially continued to operate a Minority Ethnic Achievement grant to each local authority within the consortium's EIG allocation from the Welsh Government.
- **28.** Estyn reported they had not noticed any deterioration in provision for Gypsy, Roma and Traveller, and Minority Ethnic learners since the introduction of the EIG, although they acknowledged they had not inspected this in any depth. HM Chief Inspector of Education and Training, Meilyr Rowlands, told the Committee:

"That's the most important thing; it's not so much about the source of the funding, but whatever money is spent, that there should be a thorough evaluation in order to ensure that that is being spent in the most cost-effective manner. And the structural deficiency is that not enough of that is taking place."9

The wider context of school improvement

29. The Cabinet Secretary has framed initiatives to improve educational outcomes of Gypsy, Roma and Traveller, and Minority Ethnic learners in the context of school improvement more generally. She highlighted the Welsh Government's 2014 policy statement, Minority ethnic achievement in education in Wales, which "aimed to situate minority ethnic achievement within the wider strategic framework governing education in Wales". The Cabinet Secretary told the Committee:

"Placing the drivers for improvement for these groups of learners within the context of the wider school improvement services is an important factor in

⁸ Martin Dacey, Education Achievement Service for South East Wales (EAS), Oral Evidence, 8 December 2016

⁹ Meilyr Rowlands, Estyn, **Oral Evidence**, 30 November 2016

mainstreaming the needs of these learners and enabling them to better access support."10

30. This was supported by Nick Batchelar from ADEW who told the Committee:

"There is a danger in looking at the notion that we deal with the issues about promoting the achievement of one subset of pupils separate from looking at how we build a strong education system more broadly."

31. However, Dr Brentnall believes this misunderstands the concept of inclusion. He told the Committee:

"The Welsh Government has moved to a way of talking about everything for all learners, which I believe is this misinformed idea of inclusion. My understanding of inclusion is that you recognise that people are different from one another and that pupils have different needs. You have to identify what those issues and those needs are, and then you target them. By simply saying, 'We're doing everything for all learners', I think you lose the detail."12

32. Similarly, Save the Children commented that the Welsh Government's approach to inclusion "has come to mean treating everyone 'the same'". For Save the Children, this "ignores the evidence that bespoke, flexible approaches not only work but are part and parcel of overcoming barriers so that people can enjoy equal access to services". They have concerns that "the new emphasis in school improvement on 'all learners' can mean that Gypsy, Roma and Traveller children's needs are overlooked":

"Without dedicated funding some local authorities may not prioritise or protect [Traveller Education] services because they are not seen to directly link to the school improvement agenda [or statutory responsibilities]."¹³

The Committee's view

The Committee heard mixed messages from stakeholders about the model for distributing funding now used by the Welsh Government in the form of the Education Improvement Grant (EIG). There is no clear consensus about whether funding should return to ring-fenced grants or if it should continue as part of the amalgamated EIG.

We have received no clear evidence that there has been a detrimental impact, which can be directly attributed to the amalgamation of the grants, on provision for supporting the educational outcomes of Gypsy, Roma and Traveller, and Minority Ethnic learners. However, what is apparent is that this is not known either way and the Welsh Government cannot be satisfied that there has not been any negative impact. The Committee's recommendations therefore primarily relate to the level of monitoring and evaluation that is currently undertaken (see section 4 on monitoring).

The Committee has reservations about the Welsh Government's emphasis on meeting the needs of specific groups of learners through an all-pupil approach to school improvement. The Committee

¹⁰ Letter from the Cabinet Secretary for Education, 11 November

¹¹ Nick Batchelar, Association of Directors of Education in Wales, **Oral Evidence**, 8 December 2016

¹² Jonathan Brentall, Education Consultant, Oral Evidence, 30 November 2016

¹³ Save the Children's Travelling Ahead Project, Written Evidence, EIG 20

believes it is over-ambitious and unrealistic to expect that a focus on all pupils, even generally on those from deprived backgrounds as measured by eligibility for free school meals, will trickle down sufficiently to specific groups of learners such as Gypsy, Roma and Traveller children and all of the different ethnic groups we have in Wales.

The Committee therefore believes the Welsh Government should strengthen its focus and target funding more specifically on the educational outcomes of Gypsy, Roma and Traveller learners, and minority ethnic groups that have lower than average attainment. The Committee believes this could still be done within a single Education Improvement Grant but with greater direction on how it should be used to benefit particular groups of learners, beyond general, high level objectives. The Welsh Government should monitor outcomes of the EIG more closely and hold local authorities and regional consortia to account on how the money is benefitting Gypsy, Roma and Traveller, and minority ethnic groups that have lower than average attainment. We have made recommendations regarding this in section 4, Monitoring and evaluation.

Committee Recommendations

Recommendation 1. The Welsh Government should keep under review the best model for funding activity to support the educational outcomes of Gypsy, Roma and Traveller, and Minority Ethnic learners. It should revisit this question later in the Fifth Assembly and consider whether the introduction of the Education Improvement Grant has improved outcomes for these groups of learners. In the meantime, the Welsh Government should improve its monitoring and evaluation arrangements for the Education Improvement Grant through the courses of action set out in recommendations 2 to 7 and address this overarching recommendation by the end of 2020.

04. Monitoring and evaluation

- **33.** The main issue that emerged during the inquiry was the lack of monitoring and evaluation that takes place; both in terms of how the Education Improvement Grant (EIG) is used and what impact it is having.
- **34.** The Welsh Government does not direct regional consortia on how their EIG allocations should be apportioned between the different purposes, nor does it monitor how much is spent on each of them. For example, the Cabinet Secretary could not answer in writing the Committee's question of how much of the EIG is used for supporting Gypsy, Roma and Traveller, and Minority Ethnic educational outcomes. This is a clear difference to the previous arrangements when the funding was ring-fenced into specific grants.

The role of the Welsh Government

- **35.** The Welsh Government allocates the EIG to the four regional consortia, which then administer the grant.¹⁴ The Welsh Government does not monitor or track how the money is spent or allocated below this level.
- **36.** The Cabinet Secretary informed the Committee:

"In conjunction with local government, the Welsh Government took the decision to remove the requirement to track grant expenditure by the themes of the 11 legacy grants. This was seen as a significant opportunity to reduce system costs at school, local authority and consortia level, and reflects the emphasis on outcomes not on tracking activity at a national level.

Therefore at a national level the Welsh Government does not collect data which identify how much of the EIG is spent on specific areas or themes within the overall grant, including on specific programmes and interventions. (...)

The Welsh Government does not monitor the financial input through the EIG into the services which support groups of learners at risk of underachieving. The flexibility within the EIG arrangements better enable local authorities, consortia and schools to prioritise their funding to areas of greatest need. At school level we estimate there would be a significant system cost in tracking expenditure which supports the educational achievement of individual groups of learners, in particular when we consider these groups of learners may benefit from support from other funding streams including the Pupil Deprivation Grant. As a principle we have sought to reduce the administrative costs of the grant and increase the focus on delivery and outcomes."15

37. The Cabinet Secretary also explained to the Committee that, in making the decision in autumn 2014 to amalgamate the previously ring-fenced grants, the Welsh Government listened to local authorities who felt they were being "over-monitored for relatively small pots of money".

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¹⁴ The Welsh Government explained that technically the EIG is distributed to local authorities, who through their commissioning relationship with regional consortia for school improvement services transfer this money to the consortia which then allocate the funds.

¹⁵ Letter from the Cabinet Secretary for Education, 11 November 2016

High-level objectives of the EIG

- **38.** The evidence received by the Committee suggested there is little guidance given to local authorities on how to use the EIG for supporting Gypsy, Roma and Traveller, and Minority Ethnic learners, or what outcomes are expected beyond high-level objectives and broad requirements.
- **39.** The regional consortia provide local authorities and schools with guidance notes comprising the Welsh Government's Terms and Conditions for the EIG. These are general in nature and state that the aims of the EIG are to improve educational outcomes for all learners and reduce the impact of deprivation on learner outcomes by:
 - improving the quality of teaching and learning;
 - addressing learners' barriers to learning and improving inclusion;
 - improving the leadership of educational settings; and
 - improving the provision for learners and the engagement of learners.
- **40.** In addition, the Welsh Government says the funding must be used to contribute to the delivery of the following broad requirements:
 - improving teaching and learning;
 - improving education outcomes, including literacy and numeracy, at foundation phase, key stage 2, key stage 3 and key stage 4 for all learners in all settings, including for example those learner groups who are known to be at particular risk of underachievement for example, but not limited to, as relating to gender, or those with ALN, English and/or Welsh as an additional language (E/WAL), or from certain ethnic minority groups such as Gypsy Traveller learners; and
 - improving outcomes for pupils eligible for frees school meals (eFSM) and to narrow the gap between non-eFSM and eFSM pupils.
- **41.** Schools are expected to provide a breakdown of their total EIG allocation in their School Development Plans and detail how they will use the funding. Advisers from the consortia provide support and challenge to schools to ensure their school improvement plans appropriately reflect their improvement journey and expected outcomes.
- **42.** There was little detail in the evidence submitted by the regional consortia and the Cabinet Secretary about any specific outcomes or outcome measures that are expected from the EIG, beyond the relatively high-level objectives listed above and contained in the Welsh Government's education improvement plan, **Qualified for Life**.
- **43.** The Committee asked the Cabinet Secretary for details of the outcomes and outcome measures for 2015-16 and 2016-17 for Gypsy, Roma and Traveller, and Minority Ethnic learners. In response, Kirsty Williams said the purpose of the EIG is to support national priorities and said an Education Performance Framework is being trialled in 2016-17. However, local authorities and the regional consortia demonstrated little awareness of such a framework being in operation.
- **44.** The Welsh Government has resisted calls for a formal evaluation of the impact of amalgamating the grants into the EIG, in terms of whether any of the purposes of the previous grants have been adversely affected. It is also wary of returning to a situation where the time and money

spent on monitoring detracts from the constructive use of the funding. Steve Davies, Director of the Welsh Government's Education Directorate, told the Committee:

> "What we need to be careful of is that we don't go back to a historical model where we spend a lot of time and money measuring things that are minute in detail and that distract from the actual improvement activity."16

45. However, the Cabinet Secretary acknowledged it is "timely ... to review whether the monitoring arrangements, and the use of that, are as we would want them to be":

> "It's clear that we need to look again that we can align performance management for consortia and local authority spend against national priorities."17

The role of the regional consortia

46. The Welsh Government emphasises that monitoring the EIG and evaluating its impact is the role of the regional consortia. The Cabinet Secretary's letter said:

> "The activities and interventions funded by the grant and its outcome measures are monitored regularly by consortia challenge advisers and subject to termly review and challenge meetings, which are also used for monitoring performance and achievement of outcomes.

A closing end year report from consortia will include details of progress made throughout the grant period and an overall evaluation of the programme supported by case studies as appropriate. (...)

Under the terms of the previous grants [local authorities'] Ethnic Minority Achievement and Traveller Education Services submitted reports to the Welsh Government on the support provided through the grants. Under the structures in place for school improvement through the National Model for Regional Working and the EIG, the lines of accountability and reporting go via Local Authorities and consortia."18

- This means that the Welsh Government used to directly monitor activity funded by the previous ring-fenced grants, whereas now under the EIG, this is to be conducted by regional consortia and local authorities themselves. The Committee believes this is a dilution of oversight and accountability in respect of funding that is intended to be used to support Gypsy, Roma and Traveller, and Minority Ethnic learners.
- 48. The evidence offered by the consortia, both in written submissions and orally by witnesses, gave very little indication that they undertake much monitoring of the use of funding and tracking of outcomes. Each of the four consortia submitted papers to the Committee. However, these did not contain any information about how they monitor outcomes and evaluate the impact of the EIG. The paper from ERW (South West and Mid Wales) was the only one written from the perspective of the

¹⁶ Cabinet Secretary for Education, **Oral Evidence**, 12 January 2017

¹⁸ Letter from the Cabinet Secretary for Education, 11 November 2016

consortium itself rather than being compilations of information from the relevant local authority service areas.

- **49.** When invited to attend Committee to explain their role in allocating and overseeing the EIG:
 - Only ERW (South West and Mid Wales) were represented by someone who could speak on behalf of the consortium;
 - GwE (North Wales) did not attend; and
 - EAS (South East Wales) and Central South Consortium both sent operational staff from local authorities¹⁹ who could report about the work they are involved in but not on behalf of the consortia on the wider issue of monitoring.
- **50.** ERW confirmed to the Committee that the consortium does not issue any guidance beyond the general objectives set out in the Welsh Government's Qualified for Life, which form the basis of those listed above; "it is very broad-brush guidance that we provide". ERW also said that "presumably" each local authority have maintained their own monitoring and evaluation arrangements but that the consortia do not monitor that.
- **51.** The Committee asked the WLGA and ADEW about the level of monitoring undertaken by the consortia. Nick Batchelar, Director of Education at Cardiff and representing ADEW, said:

"I think it would be fair to say that the consortium in this area, at the moment, doesn't have a particularly strong role in relation to the scrutiny of the two groups of pupils—well, there are many groups, but the two main groups are minority ethnic pupils generally and Gypsy/Roma/Travellers. Obviously, the bulk of the minority ethnic achievement grant that comes to the central south consortium ends up in Cardiff. So, the role of the consortium is largely about passporting money on to the local authorities." 20

52. Mr Batchelar confirmed that the Central South consortia does not provide any guidance on how the EIG is used or monitor its impact:

"I don't think they're well placed to do it. I think local authorities are better placed to do that. And, certainly, the consortia, through the channels and networks, can be a vehicle for brokering the dissemination of that understanding of what good practice looks like. But, behind the conversation, I think there are some issues around who the appropriate accountable body is. Local authorities are the accountable body for the progress young people make or don't make. We will end up with some confusions if the consortia are in a position where they're acting as the accountable authority for the progress of young people in the authority; actually, the authorities are the accountable body."²¹

¹⁹ It should be noted that these witnesses gave useful evidence on how the allocations that Traveller and Minority Ethnic services receive from the EIG are being used, for which the Committee is grateful, and it is no criticism of them that they were not in a position to answer questions on behalf of the consortium.

²⁰ Nick Batchelar, Association of Directors of Education in Wales, **Oral Evidence**, 8 December 2016

53. In oral evidence, the Cabinet Secretary reiterated that:

"...consortia are accountable regionally, and locally for the local authorities that make up the consortia, for the governance arrangements as to how they spend their resources and the effectiveness of the spend of those resources."²²

54. However, Kirsty Williams also commented:

"If I'm being blunt, and I hope I can be, it is disappointing to have read some of the evidence that you've received from consortia and from directors of education about their lack of knowledge and understanding (...)

To have evidence that says we simply passport it on is an abdication of responsibility, which I do not find acceptable. That means we need to go back and look again at the framework, because that's not good enough. There is significant resource going into EIG and people need to be held accountable for the proper use and expenditure and the results that we get from that money."23

An outcomes/performance framework

- **55.** The Committee heard about an "outcomes framework", which the Welsh Government previously said it would produce in order to evaluate EIG expenditure. Stakeholders said that they had heard nothing further about this and the WLGA reported that significant progress had not been made.
- **56.** The Cabinet Secretary said an "education performance framework" was being trialled in 2016-17. However, the evidence offered by the consortia and local authorities showed little awareness or use of this by local authorities and consortia.

57. Dr Brentnall told the Committee:

"Under the new arrangements, under the education improvement grant, I know of nothing that's been done, actually. I have asked about what was supposed to be the outcomes framework, but I had no reply from my colleagues in the Welsh Government who I contacted as to what's replaced the outcomes framework that didn't materialise. So, I don't know how it's being monitored now."²⁴

58. Ms Aspinwall, of Save the Children's Travelling Ahead project, said:

"My understanding now is that with the loss of the grant, the EIG has no set of outcomes framework associated with it. We raised concerns with the Minister and with Welsh Government at the time around the loss of the ring-fencing and the worries over the loss of focus. We were told specifically that an outcomes framework would be developed in time for the EIG, and then would be developed for year 2. (...)

After some months of us raising issues, [the Welsh Government] then redirected us to regional consortia business plans for detail as to how the EIG

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²² Cabinet Secretary for Education, Oral Evidence, 12 January 2017

²³ Ibid

²⁴ Jonathan Brentall, Education Consultant, Oral Evidence, 30 November 2016

was being spent to benefit Gypsy and Traveller pupils. I really struggled to find any information. The business plans seem very top level and there's no mention, really, of any specific groups, and certainly no mention of Gypsy, Roma and Traveller children and young people in any of those business plans. (...)

All I can say is that, as far as I'm aware, there is no set of outcomes framework that has been developed."25

59. Dr Brentnall contrasted this with the arrangements for the former grants:

"The minority ethnic achievement grant, as I think I explained in my notes, has been in various forms since 1966. It's been in place to address the very precise and specific needs of these groups of learners, and it's become one of the most tightly audited and tracked and monitored grants that there has been, because, every year, the local authority services had to submit for those funds. They had to bid to the Welsh Government for funding, and they had to do so by accounting for every single pupil, by assessing all of those pupils according to their stage of language acquisition, identifying asylum seekers, identifying their ethnic backgrounds, and then monitoring them and setting targets to try to raise their attainment, which, actually, over the period of the last 15, 20 years has been very successful."²⁶

60. The Committee asked the WLGA and ADEW for their perspectives on what had happened to the development of an outcomes framework for the EIG. The WLGA said

"When the EIG was set up, it was on the understanding that there would be an outcomes framework, but the truth is—although, in terms of our discussions with Welsh Government, they have been very positive, and I think that the DfES, the department dealing with it, has been very receptive—it has proved to be a difficult discussion, and over the two years, I think the truth is that we haven't made significant progress."²⁷

61. When asked for the reasons for the lack of progress, the WLGA said:

"Simply the election, the change of Government, and the fact that we've got a new Cabinet Secretary—I think those are part of the reasons as well, because the policy direction is changing and is being developed. I think that that's been the biggest reason for the delay."²⁸

62. The Cabinet Secretary told the Committee that the Welsh Government asked consortia to provide an education performance framework for 2016-17. Her official confirmed that this is the same thing as the outcomes framework which had been widely expected. However, further information provided subsequently by the Cabinet Secretary in correspondence shows that this

²⁵ Trudy Aspinwall, Save the Children's Travelling Ahead Project, Oral Evidence, 8 December 2016

²⁶ Jonathan Brentall, Education Consultant, Oral Evidence, 30 November 2016

²⁷ Dr Chris Llewelyn, Welsh Local Government Association, **Oral Evidence**, 8 December 2016

²⁸ Ibid

framework consists of no more than the "three high-level, overarching aims" discussed at paragraph 40 above.

- **63.** Kirsty Williams' letter dated 6 February 2017 stated that consortia and local authorities are "required to identify key performance indicators and measurable outcomes as part of their business planning process" in support of the three high-level aims. The Committee received no information about this from local authorities or consortia.
- **64.** The Cabinet Secretary accepted:

"It is clear that we need to look again at how we align our performance management for consortia and local authority spend against our national priorities. Whilst this applies specifically to the EIG I believe that there may be opportunities when we launch our refreshed Qualified for Life to look at the challenges of achieving a genuine outcomes focussed framework more widely in education."²⁹

The role of Estyn

65. Estyn described the extent to which they look at the provision for Gypsy, Roma and Traveller, and Minority Ethnic learners specifically, as part of their standard inspections of schools across Wales. Their written evidence stated:

"As part of Estyn's inspection of individual providers and local authorities, inspectors consider the performance of different groups of learners including minority ethnic groups, and gypsies and travellers. Inspectors judge how well a provider establishes an ethos that is inclusive as well as other equality and diversity issues. Inspectors also judge how well the provider promotes the prevention and elimination of oppressive behaviour including racism. (...)

Inspectors report on how well an individual provider has supported Gypsy, Roma and Traveller and Minority Ethnic children in improving educational outcomes using different funding streams including the Education Improvement Grant and the Pupil Deprivation Grant. Estyn has not evaluated how local authorities use the Education Improvement Grant specifically and without detailed work it is difficult to differentiate between the different funding streams."30

66. The Committee heard that in each of its inspections of the four regional consortia, Estyn was "critical of the consortium's ability to use pupil-level data to identify strengths and areas for improvement, in particular for groups of vulnerable pupils". HM Chief Inspector of Education and Training in Wales, Meilyr Rowlands expanded on this in oral evidence:

"One criticism that we have regularly made is about the lack of assessment that has been made of the efficiency of the spend in this area. For example, in the four reports that we undertook on the consortia, it was a criticism in each of those reports that not enough attention was being given to analysing how

²⁹ Letter from the Cabinet Secretary for Education, 6 February

³⁰ Estyn, Written Evidence, EIG 12

efficient the various work streams that they were carrying out were in terms of output, particularly for disadvantaged children, including, of course, the children we are talking about [Gypsy, Roma and Traveller and Minority Ethnic learners]."³¹

67. Estyn told the Committee that they had not observed any noticeable change in provision for Gypsy Traveller and Minority Ethnic learners since the amalgamation of the grants into the EIG. However, they said they have not particularly looked at this issue in any particular detail and have not reviewed this specifically since 2011. Estyn was also unable to give an update on whether the Welsh Government had acted on the recommendations made in its 2006 and 2011 thematic reports. The 2011 report found that "despite the best efforts of a few local authorities and secondary schools, much remains to be done to ensure improved outcomes for Gypsy Traveller pupils". The Chief Inspector acknowledged that Estyn has not formally followed up on its latest 2011 report and recommendations but that without being specifically remitted by the Welsh Government, they did not have the resources to do so.

"The vast bulk of our work is statutory inspections, and nearly all the other work is taken up by the remit letter. We have virtually no money left over to do additional work. But we do have intelligence. What I'm saying is that I haven't got a detailed, thematic report to tell you to what extent these things have been addressed in detail, but I can give you our general information."³²

68. The Chief Inspector also said:

"Because of the criticism that we have made of local authorities and consortia about not looking at and evaluating the work that is specifically in relation to groups of children, we do think that is something we should look at in the future. (...)

We're in discussions at present with the Government, and that is one possibility for the remit letters in the future."33

69. Save the Children's Trudy Aspinwall agreed that Estyn should review the position of these groups of learners.

"I did have a sense that they don't have an overall picture and haven't actually looked closely at an updated view on what is happening for Gypsy and Traveller pupils (...)

So, I think that two years into the EIG is quite timely to be looking at asking Estyn to undertake that kind of review, yes."³⁴

70. In oral evidence, the Cabinet Secretary reiterated that she thought it was too soon to do a full-scale evaluation about the impact of amalgamation of the grant, but that she "would be very happy to hear from Estyn that they felt this was an area that they needed to go back to".

³¹ Meilyr Rowlands, Estyn, **Oral Evidence**, 30 November 2016

³² Meilyr Rowlands, Estyn, Oral Evidence, 30 November 2016

³³ Ibid

³⁴ Trudy Aspinwall, Save the Children's Travelling Ahead Project, Oral Evidence, 8 December 2016

71. The Welsh Government has published the <u>remit letter</u> it has issued Estyn for 2017-18. It does not include a thematic review of the EIG or of provision for Gypsy, Roma and Traveller, and Minority Ethnic learners. However, it does include the "Education Improvement Grant for schools" amongst the areas in which the Welsh Government "may require advice and support" in 2017-18.

Impact assessment

- **72.** Dr Jonathan Brentnall and Save the Children were very critical of the way the decision was taken to amalgamate the grants during the 2015-16 budget round, particularly the level of impact assessment undertaken by the Welsh Government.
- 73. Dr Brentnall argued that the Welsh Government did not carry out equality impact assessments of either the decision to reduce the Minority Ethnic Achievement Grant in-year in 2014-15 or incorporating the grants into the EIG in 2015-16 "until months after the decisions had been made". He calls for an independent review to be commissioned to look at the extent to which the Welsh Government has complied with its statutory duties under the Equality Act 2010 and followed its own protocols when making this decision.
- **74.** The Strategic Impact Assessment (SIA), which the Welsh Government undertook for the 2015-16 budget acknowledged:

"There will be a decrease to the overall quantum of funding in this area, this could reduce the positive impact on the protected characteristic of race and those below 16, however there is not expected to be any impact on any other protected characteristic." ³⁵

- **75.** Dr Brentnall described the "inability to foresee that making these changes would result in a substantial staffing reduction (which he cites as 18%) within an area of specialist education provision for pupils with significant needs" as "quite astonishing". He also highlighted a disproportionate impact on black and minority ethnic employees working in local authority Minority education and Traveller education services.
- **76.** The SIA for the 2016-17 budget said the impact on Gypsy and Traveller children would be mitigated by the fact they are more likely to be eligible for free school meals and therefore attract the Pupil Deprivation Grant (PDG). However, Dr Brentnall was critical of this claim, writing:

"The PDG is not intended for targeting the needs of [English as an Additional Language] (EAL) learners (as the MEAG was), certainly not if they are [not eligible for free school meals], and it has no ring-fencing for minority ethnic or Gypsy, Roma and Traveller learners who are eFSM. Without a strict accountability framework for how these pupils are actually benefiting 'proportionately' or 'disproportionately' from the PDG in schools, it is difficult to ... evaluate the extent that the transition to the new arrangements is directly benefiting minority ethnic learners in the way that the Minority Ethnic Achievement Grant and Gypsy Traveller Grant did."³⁶

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³⁵ Draft Budget 2015-16, Welsh Government, Page 20

³⁶ Jonathan Brentall, Education Consultant, Written Evidence, EIG 19

77. Save the Children told the Committee there had not been "an explosion of PDG-funded activities that have mitigated the potential losses". They were also critical of the level of impact assessment undertaken by the Welsh Government:

"We also believe that the government failed in its duty to promote children's rights and have due regard to the UNCRC; they have not demonstrated any evidence that the amalgamation of the grants was in the best interests (Article 3) of Gypsy, Roma and Traveller children (or any other ethnic minority children); there was a failure to assess the impact on the Right to Education under Articles 28 and 29 and indeed the document was quite open in saying that it was primarily an administrative and money saving exercise that motivated the changes. Given that and their own admission that a negative impact was likely they then failed to take or propose steps to either promote equality or to protect the rights of Gypsy, Roma and Traveller children." 37

The Committee's view

The Committee was very concerned to hear about the lack of monitoring of the use of the Education Improvement Grant (EIG) and lack of evaluation of its impact. The previous Gypsy Children and Traveller Children Education Grant and Minority Ethnic Achievement Grant were subject to thorough monitoring and accountability systems that appear to have largely disappeared with the introduction of the EIG.

The Cabinet Secretary emphasised the role of the four regional consortia and local authorities themselves in monitoring the outcomes and impact the EIG is having on the educational outcomes of Gypsy, Roma and Traveller, and Minority Ethnic learners. However, the Committee received very little evidence on how the consortia and local authorities are undertaking such monitoring. We were disappointed with the evidence provided by the consortia which offered very little explanation of what they are doing to monitor use and impact of the EIG and how they ensure it is having a positive impact on educational outcomes for these groups of learners.

There appears to be some confusion about the relationship between local authorities and regional consortia. The Committee heard from the WLGA and ADEW that local authorities effectively commission school improvement services from the consortia, which provide these services on a shared, regional basis. It appears unclear whether the Welsh Government expects regional consortia to hold local authorities to account for their use of the EIG allocations or if local authorities should hold consortia to account for outcomes from the EIG as part of their delivery of school improvement services. In this context, the Committee is not convinced that regional consortia are best placed to monitor and evaluate use of the EIG and believes the Welsh Government should resume this role itself.

The Welsh Government said it is trialling an "education performance framework" with regional consortia to monitor outcomes from the EIG and evaluate its impact. However, local authorities and the consortia appeared to know little about this and said instead they were still waiting for an "outcomes framework" to be produced for the EIG. The Cabinet Secretary confirmed that these are the same thing but the Committee is concerned at these mixed messages. We urge the Welsh

³⁷ Save the Children's Travelling Ahead Project, Written Evidence, EIG 20

Government to get a much firmer grip on the way the EIG is monitored and evaluated and ensure consortia and local authorities clearly understand what is expected.

The Committee notes that the Welsh Government issues broad, high-level terms and conditions on how the EIG should be used, which correspond to the strategic objectives in its Education Improvement Plan, Qualified for Life. Correspondence from the Cabinet Secretary following her appearance in Committee revealed that the education performance framework consisted of scarcely more than these three high-level objectives. This is far from adequate and certainly not the comprehensive outcomes framework which many stakeholders expected. This was clearly demonstrated by the fact the WLGA and ADEW are still awaiting an outcomes framework and do not appear to realise that it is simply what had already been put in place.

We believe that far more detailed guidance and conditions are needed, which make more specific reference to the outcomes expected from the EIG for Gypsy, Roma and Traveller, and Minority Ethnic learners.

It is clear to the Committee that there are limitations in the extent to which Estyn can report on the standards of provision for these groups of learners and any impact the change to the grant funding arrangements has had on them through its standard inspections. The Committee believes it would be timely for Estyn to undertake a thematic review of this area. This should focus specifically on Gypsy, Roma and Traveller, and Minority Ethnic learners but could also consider the wider issue of how well the "middle tier" of education (regional consortia and local authorities) monitors and evaluate outcomes for particular groups of learners. We note that this has not been included in the remit the Welsh Government has set Estyn for 2017-18 but believe that such a review should be carried out within the next year or as early as possible.

The Committee recognises views that the impact assessment undertaken by the Welsh Government at the time of the decision in advance of the 2015-16 budget fell short of what should be expected. The Welsh Government does not appear to have reconsidered the impact of the new funding arrangements on particular groups of learners in any of the subsequent annual budget rounds. The Committee believes the Welsh Government should revisit its impact assessment of the new funding model and undertake a thorough, updated assessment which takes due regard of children's rights and equality considerations.

Committee Recommendations

Recommendation 2. The Welsh Government should review the arrangements it has put in place to monitor the use of the Education Improvement Grant and evaluate its impact, specifically in relation to the educational outcomes of Gypsy, Roma and Traveller, and Minority Ethnic learners.

Recommendation 3. The Welsh Government should take a more strategic lead in providing guidance on how the Education Improvement Grant should be used to benefit Gypsy, Roma and Traveller, and Minority Ethnic learners.

Recommendation 4. The Welsh Government should urgently review the effectiveness of the education performance framework it is expecting regional consortia and local authorities to use to evaluate outcomes from the Education Improvement Grant. The framework should make far more specific reference to the intended outcomes for Gypsy,

Roma and Traveller, and Minority Ethnic learners so that all involved in providing services for these learners have a clear understanding of what is expected from the Education Improvement Grant.

Recommendation 5. The Welsh Government should provide greater clarity on the specific role of the Welsh Government, regional consortia, local authorities and schools in monitoring and tracking outcomes for these groups of learners.

Recommendation 6. The Welsh Government should undertake a thorough, updated impact assessment of the decision to amalgamate the previous grants into the Education Improvement Grant from 2015-16, with specific reference to Gypsy, Roma and Traveller, and Minority Ethnic learners. This assessment should have regard to the UN Convention on the Rights of the Child and the Welsh Government's statutory responsibilities regarding children's rights and equalities. The impact assessment should also consider how successful the Welsh Government's action to mitigate any risks of negative impact from the decision has been.

Recommendation 7. The Welsh Government should remit Estyn to undertake a thematic review of educational provision for Gypsy, Roma and Traveller, and Minority Ethnic learners, providing an update on the position since its last thematic report in 2011. Estyn's review should consider the impact of the new funding arrangements since 2015-16 and also consider the wider issue of how well the "middle tier" of education (regional consortia and local authorities) monitor and evaluate outcomes for particular groups of learners. Estyn should be remitted to undertake this review in 2017-18 or the earliest year in which this is practical.

05. Levels of funding, impact on local authority resources and data on numbers of learners

Welsh Government EIG allocations

- **78.** Prior to the introduction of the Education Improvement Grant (EIG) in 2015-16, the former Gypsy and Traveller Children Grant was worth £1.1 million to local authorities in its final year, 2014-15, and the Minority Ethnic Achievement Grant worth £8.5 million. In total, the sum of the previous 11 grants was £153 million in 2014-15.
- 79. When the Welsh Government transferred the 11 legacy grants into the new EIG, it reduced the funding for the purposes of the Gypsy and Traveller Children Grant and Minority Ethnic Achievement Grant from £9.6 million to £8.0 million. As well as being a decrease from the 2014-15 level, this was also less than the indicative £11.6 million budgeted for 2015-16 at the time of the 2014-15 budget.
- 80. In total, the Welsh Government allocated £141 million to the new, amalgamated EIG in 2015-16. At the time, it confirmed this was £11.6 million less than the sum of its individual parts in 2014-15. The budget allocation for 2016-17 constituted a further reduction to £135 million and the Cabinet Secretary informed the Committee during the budget scrutiny in autumn 2016 that the EIG will be worth £133 million in 2017-18.
- **81.** The Welsh Government has given no breakdown of how the EIG allocations in 2016-17 or 2017-18 are apportioned between the different purposes of the grant, for example supporting Gypsy, Roma and Traveller, and Minority Ethnic learners. This is because it does not collate this information.
- **82.** Table 1 shows each regional consortia's EIG allocation from the Welsh Government in the first two years. The Welsh Government uses a funding methodology for determining each consortia's amount, which is based on the allocations of the previous 11 legacy grants, updated by the latest school census data. Local authorities are required to provide a degree of match funding for the EIG, which the Cabinet Secretary said was "typically around £11 million".

Table 1: Welsh Government allocations of the EIG to regional consortia (Source: Welsh Government)

		± MIIIION
	2015-16	2016-17
CSC (Central South)	43.461	41.359
ERW (South West and Mid)	39.978	38.079
GwE (North)	30.920	29.398
EAS (South East)	26.661	25.446
Total	141.021	134.282

C million

83. The Welsh Government sets a condition on the amount of the EIG which regional consortia can use to cover administrative costs. In 2015-16, this was capped at 1.5% before being reduced further to 1% in 2016-17. Consortia must delegate a minimum of 80% of the EIG to schools.

Information from regional consortia

84. The written evidence from the Central South consortium showed it provides individual allocations for minority ethnic achievement to the five local authorities in its region, effectively maintaining an element of ring-fencing within the EIG. The total level of funding Central South Wales allocated in 2015-16 was similar to 2014-15 but there was a 5% reduction to £4.4 million in 2016-17.

85. Information on the GwE (North Wales) consortium website states that 9.41% of its 2016-17 allocation was given to local authorities to "direct provision in targeted schools (eg support for EAL and Gyspy/Traveller pupils)". However, it is not known how much of this funding was specifically for these groups of learners rather than more generally for school improvement.

Other data on funding

- **86.** Dr Jonathan Brentnall provided the Committee with data indicating that, since the start of this decade, numbers of Gypsy Roma and Traveller, and Minority Ethnic learners have risen and the funding for specific interventions to support their educational outcomes has gone down. He obtained some of this information directly from local authorities through Freedom of Information requests and interpreted it to draw the following conclusions:
 - The number of learners from Minority Ethnic and Gypsy, Roma and Traveller backgrounds rose from 30,745 to 47,628 between 2009/10 and 2015/16.
 - During the same period (2009/10 2015/16), the total amount of grant funding (Minority Ethnic Achievement and Gypsy Traveller grants and subsequently EIG) has reduced from an annual £10.5 million to £8.9 million.
 - This has resulted in the amount of annual targeted grant funding per Minority Ethnic and Gypsy, Roma and Traveller pupil decreasing from £342 in 2009/10 to £187 in 2015/16.
 - This equates to a 45% reduction in per pupil funding from 2009/10 to 2015/16. The biggest annual reductions were in 2014/15 and 2015/16.
- **87.** Dr Brentnall's data on "per pupil" funding is shown below. This refers to Minority Ethnic and Gypsy, Roma and Traveller pupils specifically.



Figure 1: Percentage reduction in average per pupil funding (Source: Dr Jonathan Brentnall)

88. Dr Brentnall argued that the impact of the reductions in funding has been exacerbated by the introduction of the EIG and the requirement that 80% of the grant is delegated directly to schools. He highlighted the impact this has on central local authority Traveller and Minority Ethnic services,

whose role Save the Children also emphasised is very important for reaching these groups of learners. Trudy Aspinwall told the Committee:

"For schools to keep that relationship, that connection and that support going, that's just not possible, because one day they might be here, and another day they might be there and the next day they might be over the border.

But, actually, the centralised services were able, particularly through their longestablished relationships with families, to keep that contact."38

89. Dr Brentnall concluded from information he had obtained from local authorities that, up to the end of August 2015, there had been a 17.7% decrease in the full-time equivalent staff specialising in Gypsy Traveller and Minority Ethnic education and achievement. He also highlighted there had been a disproportionate effect on staff from minority ethnic backgrounds, saying the reduction in their staffing levels has been 21.8% compared to 16.2% amongst White Welsh/British staff.

The Cabinet Secretary's response

90. When the Committee asked the Cabinet Secretary about the apparent reduction in funding per head, she responded:

"One particular contributor to the committee's work has laid that evidence before the committee. Other evidence suggests that that isn't necessarily the case. As I said to Julie, undoubtedly, where there have been changes in service—and there have been, like, for instance, Swansea has restructured its service—it's difficult to unpick whether that's a direct result of the amalgamation of the EIG, or whether that reflects other pressures within local authority budgets.

One of the reasons for the amalgamation of the grant was to try and mitigate against loss of resource, because we need to get the best value out of the money that we are putting into educational improvement in very, very difficult circumstances that previous Ministers have found themselves in. And it was felt that, actually, if you amalgamated the grant into one and spent less money on administration and monitoring, that would allow for more of the money to reach the front line."³⁹

91. Kirsty Williams also said this was not a concern that local authorities and/or the WLGA had registered with her:

"It's certainly not feedback that I have had in discussions with the Welsh Local Government Association. It's not something that they have expressed concerns to me about. Believe me, they've got a lot of concerns that they bring to my table, as do Estyn, who have a lot of concerns that they bring to my table, but the amalgamation of the grant or a diminution of these services is not something that they have reported back to me." 40

³⁸ Trudy Aspinwall, Save the Children's Travelling Ahead Project, Oral Evidence, 8 December 2016

³⁹ Cabinet Secretary for Education, Oral Evidence, 12 January 2017

⁴⁰ Ibid

92. Dr Brentnall challenged the Cabinet Secretary's apparent disputing of his data. The Cabinet Secretary has not provided any information or alternative statistics to elaborate further.

Security of future funding

93. The witnesses giving evidence on behalf of regional consortia highlighted the challenges that rising numbers of minority ethnic leaners pose for services, particularly new arrivals of unaccompanied asylum seeker and refugee children. Martin Dacey, Head of the Gwent Minority Achievement Service (GEMS) in South East Wales, told the Committee:

"If nobody takes anything else away from this, what I would like people to understand is that we cannot underestimate the challenge for authorities who have never had this type of child before. Unaccompanied asylum seeker children and refugee asylum seeker children present with a unique set of challenges and issues. It is absolutely essential you have the expertise then to go in to help upskill those schools when faced with that—essential."41

94. Cardiff Council's Gill James, who chairs the local authority minority ethnic services forum, added:

"Certainly that was the message from all local authorities. They were concerned about the uncertainty of the funding going forward when they had increasing numbers of children coming from different routes, and that was certainly something that they really wanted to raise. And not knowing how much you're going to get from year to year makes it very difficult to plan in terms of staffing, and that is an issue."

95. Helen Morgan-Rees from the ERW (South West and Mid Wales) consortium described the difficulties of planning future service delivery amidst uncertainty over future funding:

"Once the money is delegated to directors and local authorities, it's within the local authority's gift then to decide how they want to have a sustainability model in terms of funding. But it's very difficult if the total amount of the EIG from one year to the next is reducing. So, it's very difficult to project. We don't know how much EIG, or if it will be EIG in April, that we'll get, so it's very difficult to project into the future and to have a sustainable plan." 43

96. Ms Morgan-Rees also said:

"[Local authorities in South West and Mid Wales) lost staff because they're not sure about the certainty of the service, the prioritisation of the service, the status of the service. So, staff in Swansea, for example, have been reduced from 66 full-time equivalents to 44."44

97. The WLGA reported that the terms and conditions of the EIG "did not give scope for sufficient flexibility" as the "vast proportion of the grant" is needed to support the delivery of the Foundation

⁴¹ Martin Dacey, Education Achievement Service for South East Wales (EAS), Oral Evidence, 8 December 2016

⁴² Gill James, Central South Joint Education Service, **Oral Evidence**, 8 December 2016

⁴³ Helen Morgan-Rees, Education through Regional Working (ERW), **Oral Evidence**, 8 December 2016

⁴⁴ Ibid

Phase (just under £100 million of the total £141 million in 2015-16). Local authorities are under statutory duties regarding staff/pupil ratios in the Foundation Phase which they must adhere to.

98. The WLGA told the Committee:

"I think, as well, there were unexpected consequences of merging one or two very large grants with a few small grants. I think that the foundation phase has had a disproportionate impact on the EIG because the terms and conditions around the foundation phase grant, and specifically the pupil-staff ratios, have meant that the cut in the funding inevitably fell on the other elements of the EIG. But authorities are working as effectively as they can to mitigate those cuts." 45

Reliability of data

- **99.** The Committee heard that the amalgamation of the previous grants has had implications for the reliability of the available data on numbers of Gypsy, Roma and Traveller, and Minority Ethnic learners.
- 100. The Welsh Government collects data on pupils on school rolls, as recorded by head teachers on school census day in January each year. This is known as the **Pupil Level Annual School Census (PLASC)**. The data for 2015/16, published in July 2016, records 996 pupils as being from a Gypsy/Roma background, which is 0.1% of all pupils. The data records 10.1% of all pupils as having a minority ethnic background, which equates to just under 40,000 pupils.
- **101.** However, Dr Brentnall cited three forms of data which he obtained under Freedom of Information requests to local authorities and the Welsh Government. These put the number of Gypsy, Roma and Traveller pupils in 2014/15 at 957 (according to the official PLASC data), 1,682 or 2,447, depending on which measure was used. He reported the number of Minority Ethnic pupils as ranging from 36,332 (PLASC) to 40,184 and 45,086.46
- **102.** Save the Children also highlighted concerns over the reliability of data, commenting:

"With the introduction of the EIG, the Welsh Government have now lost a centrally collated system that gave an overview of numbers of Gypsy, Roma and Traveller children in Wales."47

103. Trudy Aspinwall acknowledged this was not an entirely new problem and that underestimates of the numbers of Gyspy, Roma and Traveller children was a "perennial issue". However, she told the Committee:

"But, whilst you had that bespoke grant with specialist staff who knew families and who knew children and young people, who were targeting and working with and approaching those families, then there wasn't such a big issue. But once that's gone, I would query how local authorities are counting the number of children and young people that are Gypsy, Roma and Traveller, who may

⁴⁵ Dr Chris Llewelyn, Welsh Local Government Association, Oral Evidence, 8 December 2016

⁴⁶ Jonathan Brentall, Education Consultant, Written Evidence, **EIG 19** [Dr Brentall updated his statistics in a later e-mail to the Committee]

⁴⁷ Save the Children's Travelling Ahead Project, Written Evidence, **EIG 20**.

need—not always, but may need—particular bespoke support. I just think that is the real issue (...)

But in terms of data collection, I think that, for me, it's an issue of you can't effectively allocate resources if you don't know how many children and young people there are in your schools or outside of your schools who may need work in terms of outreach work or engagement work. But, actually, it's not going to happen. If you're not registered at school and you're not registered as Gypsy/Traveller, you wouldn't have got the old grant. But now, I don't think you have much chance, really, of getting any resources allocated to you as a child who may need support in your education."48

104. Martin Dacey of GEMS confirmed that the unreliability of PLASC data is an issue for local authorities and that central specialised services have an important role in producing more accurate data:

"Effectively, we have tried to go on the PLASC data that we've received. Unfortunately, we have seen that that is unreliable for a myriad of different reasons. We could probably spend the rest of the meeting discussing why it's unreliable—but, it's unreliable. So, effectively, this is time consuming, it is, but, what we do is we go direct to schools ourselves and we work with them to update on a school level the WAG language stages and the key information to do with language background, ethnic codes, those types of things, and then we create our own databases."49

The Committee's view

The Committee was concerned to hear evidence indicating that the targeted funding, through the previous grants and following the introduction of the Education Improvement Grant, per Gypsy, Roma and Traveller, and Minority Ethnic pupil has almost halved between 2009/10 and 2015/16. The Committee notes that the Cabinet Secretary appeared to dispute this data and believes the Welsh Government should investigate further and provide its own data, if different to what has been supplied to the Committee.

Given that the number of learners, which the funding is intended to support, appears to have risen significantly and the fact budgets have remained static or even decreased, there is likely to have been a dilution in provision. This issue is likely to become more pertinent as local authorities take responsibility for greater numbers of refugees and asylum seeking children.

The Committee noted that the leadership within local government did not seem unduly concerned about the effects on staffing within these local authority service areas in recent years. The Committee heard evidence of uncertainty over the security of future funding for Traveller Education and Minority Achievement services and evidence from Dr Brentnall suggesting substantial staffing reductions. It is not clear to the Committee to what extent this is due to the new funding model introduced in 2015-16, longer-term trends of funding for these service areas, or more generic budget pressures on local authorities.

⁴⁹ Martin Dacey, Education Achievement Service for South East Wales (EAS), **Oral Evidence**, 8 December 2016

⁴⁸ Trudy Aspinwall, Save the Children's Travelling Ahead Project, Oral Evidence, 8 December 2016

The Committee notes that there is imbalance between the individual elements that make up the EIG. A large portion is used for the Foundation Phase and the Committee heard that the smaller elements of the EIG risk shouldering more of the burden of reductions to the total funding available to the EIG, particularly where they are non-statutory services. The Committee is concerned that discretionary elements such as activities to support Gypsy, Roma and Traveller, and Minority Ethnic learners could be squeezed out by larger, statutory responsibilities such as the Foundation Phase.

The Committee believes more needs to be done to record more reliable, accurate data on numbers of Gyspy, Roma and Traveller learners in particular. Historic difficulties of arriving at robust data for this group of learners appear to have been exacerbated by the amalgamation of the previous grants and consequent pressures on the role of central local authority services. The Committee heard that EIG allocations are based on the previous legacy grants and updated in line with the latest annual school census data. If this census data does not reliably capture all relevant learners, this poses the question of whether funding allocations adequately reflect the number of learners in need of support.

Local authority services are often better placed than schools to engage with children and young people from these backgrounds, and crucially their families. The Committee understands the objective of delegating high proportions of funding to schools as possible, which is in line with the approach to school budgets more generally. However, the Committee believes the Welsh Government should consider whether there are any unintended consequences of this approach, particular on the capacity of local authority services to work with Gypsy, Roma and Traveller, and Minority Ethnic learners.

Committee Recommendations

Recommendation 8. The Welsh Government should work with regional consortia and local authorities to gain a clearer understanding on how much funding is being made available to support Gypsy, Roma and Traveller, and Minority Ethnic learners. It should also consider the number of learners supported by this funding, particularly in light of increases in asylum seeking and refugee children, and provide the Committee with an assessment of per pupil funding levels.

Recommendation 9. The Welsh Government should work with regional consortia and local authorities to assess the impact of long-term funding trends and the new grant funding arrangements on relevant service areas within local authority.

Recommendation 10. The Welsh Government should consider how more reliable, accurate data on numbers of Gypsy, Roma and Traveller, and Minority Ethnic learners can be recorded. The Welsh Government should ensure allocations of the Education Improvement Grant in respect of these groups of learners are based on the most up to date, reliable data.

06. Improving outcomes

Welsh Government strategies

- **105.** The Welsh Government has a **Gypsy and Traveller Framework for Action and Delivery Plan, Travelling to a Better Future**, and published updates on progress in November 2013 and March 2016. The plan includes several objectives related to education. In its March 2016 update, the Welsh Government accepted the attainment and attendance of Gypsy and Traveller pupils is "still too low" and that they face "a unique set of barriers towards engagement".
- **106.** The Welsh Government previously published research on Gypsy and Traveller education in 2014, which followed a thematic report by Estyn in 2011.
- **107.** In March 2014, the Welsh Government published an Information Document, aimed at leaders and practitioners throughout the education system in Wales, **Minority ethnic achievement in education in Wales**. The Welsh Government sees minority ethnic achievement as "inherent" in its wider school improvement programme, said it was "committed to improving the well-being and educational attainment of minority ethnic pupils", and "will hold services to account for delivering improved learner outcomes".
- **108.** The Cabinet Secretary informed the Committee that the updated version of the Welsh Government's educational improvement plan, Qualified for Life, (due Spring 2017) will "include a specific objective for well-being and inclusion within an education system which helps to tackle inequalities and support all learners to fulfil their potential".
- **109.** The Welsh Government is also planning to update its strategy for raising ambition and attainment amongst pupils from deprived backgrounds, **Rewriting the Future**, in 2017. Save the Children have called for specific consideration to be given to Gypsy, Roma and Traveller learners in the updated strategy.

Current attainment levels

110. The Cabinet Secretary acknowledged that the current attainment levels of some of the groups of learners which the Committee's inquiry focused on were not good enough. However, she also stressed that minority ethnic learners should not be regarded as one homogenous group:

"What we do know is that, for Gypsy and Traveller children, their results at GCSE level are not where we would want them to be—far below national averages. But, for many other groups of children, we see Indian and Chineseheritage children way outperforming white Welsh children, and those from a Pakistani heritage or Bangladeshi heritage catching up and, in some cases, surpassing us. We still have an issue with the attainment levels of black Caribbean children. Again, that's one particular group of children who're not doing as well as we would like. So, I think it's important to recognise that we can't group all children together and that there are particular challenges for particular groups."50

⁵⁰ Cabinet Secretary for Education, Oral Evidence, 12 January 2017

111. This was echoed by Estyn, who told the Committee:

"In terms of minority ethnic groups generally, they're a very different group; they're not a homogeneous group. And most ethnic minority groups do relatively well. Over the last, sort of, five years or so, many of them have actually overtaken white British children by the end of key stage 4 in some of the major performance indicators. The main exceptions to that are black, particularly black Caribbean children from that background and, as you've said, Gypsy/Traveller children. It's very concerning that even though there have been small increases over the last few years in the attainment and, indeed, the attendance of Gypsy/Traveller children, their attendance and attainment is far below what it should be. So, for example, at the main key stage 4 indicator, level 2 plus inclusive, the average for Wales is 56 per cent and for Gypsy/Traveller children it's only 15 per cent. So, you know, it is very, very concerning." 51

Post-16

112. The Committee received a joint written submission from the People and Work Unit, an independent charity working to tackle inequalities and promote employment through education and learning, and Egino, which is an education consultancy. People and Work and Egino said:

"Although young people from some ethnic minorities are now more likely to participate in higher education than their White British/Welsh counterparts, some minority groups remain under-represented and overall, ethnic minority students have tended to be under-represented in prestigious universities. For many minorities from less advantaged backgrounds, wanting to take up higher education the financial costs involved is a major consideration. However, the lack of transparency around the allocation of bursaries tends to be problematic for many from ethnic minority backgrounds. The lack of fluency with career paths, qualification frameworks, certification, accreditation and gaining career advice is a well-known barrier."52

113. In order to access funding, higher education institutions are currently required to have "Widening Access" policies and practices to promote opportunities for people of all ages and backgrounds who have the potential to benefit from higher education. The Committee asked the Cabinet Secretary whether the Welsh Government could do more to encourage Gypsy Traveller and Minority Ethnic participation in higher education through its implementation of the Diamond Review and the new system of student finance set to be introduced from 2018/19. Kirsty Williams referred to the Welsh Government's consultation on its response to Professor Sir Ian Diamond's report:

"If I receive responses to that consultation that say this is an area to be looked at then, obviously, in consideration of how we go forward, I will look at it." 53

114. People and Work and Egino also highlighted the "paucity" of ethnic minority role models in schools, even in schools which have a high proportion of pupils from ethnic minorities. They called for

⁵¹ Meilyr Rowlands, Estyn, Oral Evidence, 30 November 2016

⁵² People and Work and Egino, Written Evidence, EIG 08

⁵³ Cabinet Secretary for Education, Oral Evidence, 12 January 2017

an action plan to encourage people from ethnic minority backgrounds to enter the teaching profession. The Cabinet Secretary commented:

"The lack of diversity in our teaching population is very, very, very apparent, but also the difference it does make if you have teachers from a diverse—. So, Fitzalan, for instance, I recently visited, here in Cardiff, and they have physics being taught by a Spanish teacher. They said that having a teacher who has come from a different background, from a different country, whose first language isn't English, actually is a very positive role model for the diverse nature of the children in that particular school to see that teacher there. But that is a very rare example."54

The Committee's view

The Committee welcomes the recent relative improvement in the attainment rates of Gypsy/Gypsy Roma learners but remains concerned that they are still too low. In the period 2014-16 the proportion achieving 5 or more GCSEs at grades A*-C (Level 2 threshold) is 53.8%, compared to 85.3% amongst their peers. The proportion achieving 5 or more GCSEs at grades A*-C including English or Welsh and Mathematics (Level 2 threshold inclusive) is 24.4%, compared to 59.0% for all pupils. The Committee notes that the gap has narrowed since 2010, and the particular improvement during 2014-16, but believes the gap remains unacceptably wide.

Despite the recent improvement, Gypsy/Gypsy Roma learners' attainment of the Level 2 threshold inclusive is 7.2 percentage points below the general proxy for disadvantage – eligibility for free school meals – which illustrates they are still behind other disadvantaged pupils. The Committee recognises that a particular challenge is to ensure these learners are in school and/or accessing education, as shown by their comparatively high levels of absenteeism. Attendance rates have improved amongst Gypsy/Gypsy Roma and Traveller learners, as they have for all pupils, but the Committee believes the Welsh Government should continue to focus on attendance rates for these groups of learners, as part of a comprehensive effort to improve their educational outcomes.

The performance of most minority ethnic groups is relatively positive, with many groups defined in the data attaining higher than their peers. The exception is Black/Black British pupils whose attainment of the Level 2 threshold inclusive is 5.7 percentage points lower than the average. Within this group of pupils, the rate for Black Caribbean pupils is 40%, 19 percentage points below the average for all pupils. 47.4% of mixed ethnicity White and Black Caribbean pupils achieve the Level 2 threshold inclusive. A more targeted approach is needed to raise attainment amongst certain minority ethnic groups, focusing on groups of learners whose levels are particularly in need of improvement.

The Committee believes that more could be done to engage certain minority ethnic groups, and Gypsy, Roma and Traveller young people in particular, in formal education and training beyond the age of 16. Many minority ethnic groups have higher than average participation levels in higher education. However, there would be benefits in tracking individuals or groups of learners not engaging or achieving poorly up to age 16, rather than being forever left outside the system.

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⁵⁴ Cabinet Secretary for Education, Oral Evidence, 12 January 2017

There is a lack of role models in the education profession. Addressing this could help motivate and encourage Gypsy, Roma and Traveller, and certain minority ethnic groups of learners to engage positively in education.

Committee Recommendations

Recommendation 11. The Welsh Government should do more to improve educational outcomes amongst Gypsy, Roma and Traveller learners and work to close the gap between them and their peers. This should include a specific focus on them as a particular group of learners and not rely solely on more general initiatives to raise attainment across the board.

Recommendation 12. The Welsh Government should do more to improve educational outcomes of specific minority ethnic groups who attain lower than the average for all pupils, particularly Black or Black British, and mixed ethnicity White and Black Caribbean pupils. This should include a specific focus on them as particular groups of learners and not rely solely on more general initiatives to raise attainment across the board.

Recommendation 13. The Welsh Government should consider what more can be done to support Gypsy, Roma and Traveller young people, and young people from minority ethnic backgrounds at risk of underachievement or disengagement, to participate in further and higher education. The Welsh Government should consider how this could be taken forward under the new student finance arrangements following the Diamond Review.

Views of children and young people

- **115.** Save the Children's Travelling Ahead project works with young people, generally aged 11-19, from Gypsy, Roma and Traveller backgrounds. The project aims to support the young people's rights and participation, offering opportunities to build confidence and skills and engage with policy-makers on issues that affect them.
- **116.** An important part of the Travelling Ahead project has therefore been to gather the views of the people they work with. Save the Children supported the young people in producing a report, **Good Practice in Education: Peer Research Project** (2016), which includes twelve recommendations from the Gypsy, Roma and Traveller young people themselves. These recommendations centre around the young people's three main messages for schools and education authorities:
 - Be aware of our culture:
 - Be aware of our differences with the settled community;
 - Flexible education and part-time attendance options for all pupils around Wales.

The Committee's view

The Committee believes the Welsh Government should take note of what the Gypsy, Roma and Traveller young people have said in their report and consider how it can take forward their recommendations.

Committee Recommendations

Recommendation 14. The Welsh Government should consider the report of the young people working with Save the Children's Travelling Ahead project, Good Practice in Education: Peer Research Project (2016) and take forward their recommendations. The Welsh Government should disseminate the report across regional consortia and local authorities and request that they follow the recommendations as far as possible. The Welsh Government should report on progress within the next 12 months.

Annex A - Schedule of evidence

The following witnesses provided oral evidence to the Committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed in full at: **Meeting Transcripts**

Date	Name and Organisation
30 November	Meilyr Rowlands, HM Chief Inspector, Estyn
2016	Claire Morgan, Strategic Director, Estyn
	Farrukh Khan, HM Inspector, Estyn
	Dr Jonathan Brentnall, Education Consultant
8 December 2016	Trudy Aspinwall, Senior Programme Officer - Save the Children's Travelling Ahead Project
	Regional Consortia
	Gill James, Central South Joint Education Service
	Helen Morgan-Rees, Head of Eastern Hub — Education through Regional Working (ERW)
	Martin Dacey, Head of Gwent Education Minority Ethnic Service (GEMS) — Education Achievement Service for South East Wales (EAS)
	Association of Directors of Education in Wales and Welsh Local Government Association
	Dr Chris Llewelyn, Deputy Chief Executive, Director of Lifelong Learning, Leisure and Information — WLGA
	Nick Batchelar, Director of the Association of Directors of Education in Wales
12 January 2016	Kirsty Williams AM, Cabinet Secretary for Education
	Steve Davies, Director, Education Directorate
	Stephen Gear, Head of Supporting Achievement and Safeguarding

Annex B - Written evidence

Reference	Organisation
EIG 01	Conwy County Borough Council
EIG 02	Catholic Primary School
EIG 03	St Margaret's Catholic Primary School
EIG 04	St John Lloyd RC Primary School
EIG 05	Blaenau Gwent County Borough Council – Education Directorate
EIG 06	The Centre for Children and Young People's Participation, University of Central Lancashire
EIG 07	Wales Centre for Equity in Education, University of Wales Trinity Saint David
EIG 08	People and Work and Egino
EIG 09	North Wales Local Education Authorities (GwE)
EIG 10	Health Visitor – Swansea
EIG 11	Minority Ethnic Achievement Support (MEAS) — Neath Port Talbot County Borough Council
EIG 12	Estyn
EIG 13	The National Association of Schoolmasters Union of Women Teachers (NASUWT Cymru)
EIG 14	Merthyr Tydfil County Borough Council
EIG 15	Children's Commissioner for Wales
EIG 16	Cardiff Local Authority Central South Consortium
EIG 17	Education Achievement Service (EAS)
EIG 18	Equality and Human Rights Commission
EIG 19	Dr Jonathan Brentnall
EIG 20	Travelling Ahead
EIG 21	Neath Port Talbot GRT Forum
EIG 22	City and County of Swansea
EIG 23	Swansea Bay Regional Equality Council (SBREC) & Western Bay Gypsy Traveller Forum
EIG 24	Welsh Local Government Association
EIG 25	Education through Regional Working (ERW)
EIG 26	Carmarthenshire Minority Ethnic Achievement Service
EIG 27	Vale of Glamorgan Council
EIG 28	Cabinet Secretary for Education

Additional evidence received

Reference	Organisation
CYPE(5)-06-17	Cabinet Secretary for Education
CYPE(5)-04-17	Estyn
CYPE(5)-01-17	Dr Jonathan Brentall
CYPE(5)-14-16	Save the Children's Travelling Ahead Project