

Education and Lifelong Learning Committee

Generic List

Objectives of Proposals

1. ELWa must work towards clear objectives.
2. The focus should be on quality of provision. The quality of current provision and results should be considered above a simple expansion in types of course provided. "Lack of choice" should not be a reason for closure.
3. The objectives may need further definition. Does "increase participation" refer to retention as well as recruitment? Does "improve educational attainment" recognise pastoral and spiritual dimensions as well as academic?
4. A 6th form should only be considered for closure if it is inefficient, inadequate or failing (on inspection evidence)

ELWa's Powers

5. There is concern that costs may force decisions rather than quality... in practice, ELWa can use its control over funding to influence this and in effect, to drive this process. Decisions should only be taken for the benefit of learners and not primarily for financial reasons.
6. Too much power is devolved to ELWa, there is no need to amend the SSF Act 1998. ELWa should not have the power to close / set-up 6th forms as LEAs have more knowledge of these; LEAs have strategic planning remit for all schools, not ELWa. ELWa should not have "the authority" to close or amend a 6th form at a voluntary aided school. LEAs have never had powers of this sort over VA schools, and are thus new and not a transfer of powers. The powers given to ELWa will supersede those held by the school's Governing Body.
7. The process should be entirely within the elected process. Decisions of this sort should be left with elected LEAs rather than non-elected and non-accountable ELWa.

Relationship between ELWa and other stakeholders/ initiatives

8. Who will manage the process?
9. There is concern about lack of involvement of LEAs and governing bodies in the consultation process. Regulations should specify ELWa having prior consultation with LEA before publishing proposals. No proposal should be made without discussion with Gov Body, LEA and head teachers. LEA and Governing Body have a critical role to play in consultation and this should be set out in the Regs. There should be extensive guidance on the division of roles between LEA and ELWa. Powers should be exercised in partnership with LEA. A proposal should not proceed if there is opposition from either ELWa or the LEA.
10. ELWa issuing consultation to persons it "considers appropriate" is "dangerous". All possibly affected parties should be consulted before proposals are formulated. It would (not) be a positive step for WAG to allow ELWa to make proposals that are not the preferred option of local partnerships.
11. Governing bodies should be informed of the creation of new schools (reg 5 4 b) in their area. Publication should include sending proposals to governing body and headmasters. Head teachers should have more involvement in consultation and initial preparation of the proposal.
12. Regulations should include a requirement to consult with CCETs and local 14-19 groups.
13. Would like all mainstream schools to "inform all current (registered) parents at the school" of proposals, also parents at feeder primary schools.
14. CCETs may not be effective organisations to take forward this work. If CCETs are making decisions, who is quality assuring the CCETs and their decisions? Should CCETs have more input at the beginning than the LEA? CCETS and LEAs should be consulted at the same time. Using CCETs may "disenfranchise agencies...not represented or choose not to be involved with a CCET". CCETs should include a diocesan representative.
15. ELWa must ensure proposals are consistent with LEA strategy on provision of places.
16. Proposals create an obstacle to continuity. These proposals may break continuity of Learning Pathways at 16.
17. The 14-19 agenda should be taken forward by one body, not two

Content of Proposals

18. The Regs and ELWa should consider impact on all learners, not just post 16s.
19. The regs should show the reason alterations are being proposed

20. To ensure value for money, an appraisal of other potential options needs to be carried out.
21. Consideration should take availability of denominational choice, the value of the 6th form to the denominational community into account, Will these regs remove the power of Catholic schools to provide "appropriate education" for those pupils whose parents have chosen "a specifically Catholic school" (reducing choice?).
22. Would like "value added per student" and completion rates to be included as criteria for review.
23. Proposals should show how curriculum will be safeguarded and expanded (and future plans), how new arrangements will "significantly enhance" curriculum opportunities.
24. Regs must have an analysis of how loss of 6th form will affect the rest of the school, including viability of pre-16 provision into account where 6th form closed.
25. Will Estyn's role in advising WAG on changes to school status continue? additional info in parts 4,5 and 6 should include Estyn reports.
26. Teachers may resent the loss of post-16 teaching opportunities- this may cause them to defect to teach in FE.
27. ELWa must ensure they have regard to bilingual provision and their e-learning strategy. There is currently no mention of Welsh medium or bilingual support.
28. The appraisal should consider the impact of competition on other providers.

Detail of Consultation

29. Under 5 2(a), consultation will have to take into account that church schools may serve a very large area.
30. There should be a statutory duty to consult with trades unions in the regulations.

Objection arrangements

31. 2 months is too short for the objection period. Regs should state that the objection period should not include any holiday period
32. Suggests ELWa convene public meeting in areas affected for objections to be "heard in public".

33. Consultation and objection periods should take into account timings of affected Governing Body meetings.

34. Why are parents of children at special schools notified when parents of others aren't (or aren't specified)?

Submission to the Minister

35. More time (than 1 month) should be allowed for ELWa to complete submission to the Minister

36. The Assembly should issue the response/ notification of decision to all parties ASAP.

37. Will ELWa consult on (before implementing) and make public their procedures for approving/ submitting procedures?

Other issues

38. Will the Assembly review the content of these Regs as experience is gained?

39. The implementation date should be deferred to April 2006, and that the regs should not be put forward for publication until ELWa have published their new Planning and Funding system in the summer. The concern is the impact of the Planning + Funding review will need to be seen on schools before these proposals come into effect. Delaying the introduction of these proposals would mean having the benefit of seeing what the new P+F system means in reality for schools

40. Would any change be required to the Regs if an FEI wanted to expand?

41. It is regrettable the SI was not made available in Welsh.

42. The document (particularly relating to the consultation process) is unclear.

43. Is there info available on what capital funding is available to implement proposals?

44. Will the proposals for change be underpinned by "contractual arrangements" for performance arising from proposals?

45. LEAs should establish a post-16 proposals group.

46. Will the Assembly set up a group within ELWa to monitor proposals and to seek the views of "young people in the area"?

47. Who bears redundancy costs?

48. Schools should have more time to improve following a poor Estyn report, or the "Action Planning" process serves no purpose.