

To:

Children, Young People and Education Committee

The National Assembly for Wales, Senedd, Cardiff

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

December 12<sup>th</sup> 2016

Dear CYPE Committee members,

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

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

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

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

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

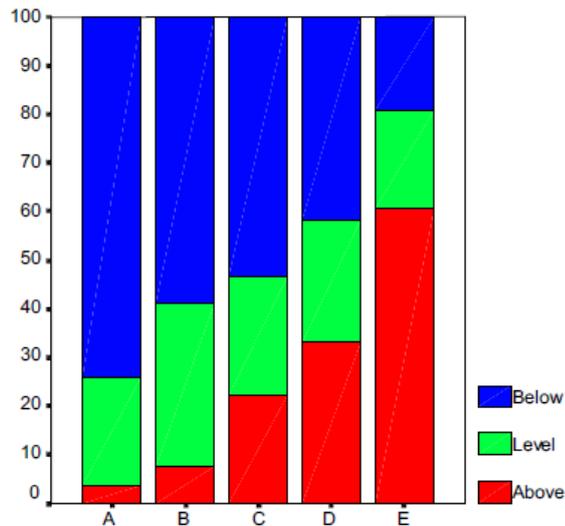
I was especially concerned at the evidence provided by the Director of Education for Cardiff and the WLGA. **In the context of an inquiry into impacts on provision for minority ethnic, Gypsy Roma and Traveller pupils**, the Director of Education emphasised the smallness of the GRT CYP grouping and the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

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

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

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

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



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

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

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

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

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

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

### **Learning Lessons from England and Cardiff**

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

### **Poverty, Ethnicity and the Pupil Deprivation Grant**

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

### **Education for the Diverse People of Wales**

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

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

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

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

### **Suggested Recommendations**

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

I hope you find these additional pieces of information helpful.

Yours sincerely

Jonathan Brentnall