

**Kirsty Williams AC/AM**  
**Ysgrifennydd y Cabinet dros Addysg**  
**Cabinet Secretary for Education**



**Llywodraeth Cymru**  
**Welsh Government**

Ein cyf/Our ref MA-P/KW/3256/18

Lynne Neagle AM  
Chair of the Children, Young People and Education Committee  
National Assembly for Wales  
Cardiff Bay  
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21<sup>st</sup> September 2018

Dear Lynne,

Thank you for your letter of 19 June regarding the Committee's *On the Money?* report following its inquiry into the Welsh Government's approach of targeting funding on particular cohorts of pupils, primarily disadvantaged pupils.

I welcome the report and I am pleased the Committee recognises the positive impact policies in this area have had. This inquiry has raised the profile across the sector of the needs of disadvantaged learners and benefits the grant can provide which is a positive outcome. The strength of the evidence provided to the Committee highlights both the importance of ensuring our provision for disadvantaged learners meets each individual learners needs and the continued commitment from all involved.

I will continue to strive to ensure as many barriers as possible are removed so our most disadvantaged learners have every opportunity to reach their full potential whilst also maximising the impact of the funding available.

Whilst the inquiry, by its very nature, has a retrospective focus, the Committee will be aware of the wider reform across our education system that is taking place, including curriculum and accountability arrangements. I am confident these changes are necessary and will have a positive impact on our disadvantaged learners over the long term; however I fully agree with the Committee that we must also be mindful of the impact of these reforms in the short term on our disadvantaged and vulnerable learners.

The attached table sets out the Welsh Government's response to each recommendation. I am pleased to have been able to accept the vast majority of the Committee's recommendations. I have accepted in principle a few of the recommendations and have set out my reasoning for these. I am unable to accept a small number of recommendations and again I have explained my rationale.

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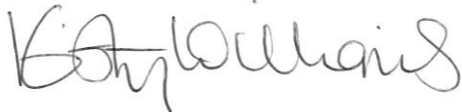
Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

I have committed to provide the Committee with further updates in relation to a number of recommendations; I will do this as information becomes available or work develops.

Please pass on my thanks to the Committee and everyone else involved in supporting your inquiry.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kirsty Williams'.

**Kirsty Williams AC/AM**

Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education

## Recommendations

**R1: The Welsh Government should regularly assess the scale of investment required for the Pupil Development Grant (PDG) in terms of value for money and opportunity cost. In particular, the Welsh Government should closely monitor on an ongoing basis the PDG's impact on the pupils it targets.**

### Accept

I am pleased the Committee recognises the positive impact the Pupil Development Grant (PDG) has had and the contribution it has made to reduce the attainment gap.

Firstly, I would like to provide assurance that the Welsh Government regularly assesses all investments across its portfolio, including the PDG and we will continue to do so. It is probably fair to say that the PDG is one of the most thoroughly evaluated education policies.

Following the inception of the PDG in 2012 a three year evaluation (2013/14-2015/16) was undertaken to establish the grant's effectiveness. More recently evaluations of the Looked After Children (LAC) and Early Years (EY) elements have also been commissioned. The aim of the PDG-LAC study was to evaluate the implementation and management of the grant since the changes to its allocation and management in April 2015. An early process evaluation took place during the second year of the EYPDG to evaluate how the grant was being implemented by practitioners across the different settings, whether it was being implemented as intended and to identify any emerging best practice. The EYPDG evaluation was published on 20 September and the PDG-LAC evaluation will be published later in the autumn. The aim of all three evaluations was to provide assurance that initial implementation proceeded as planned. Before commissioning any further research I want to reflect on this evidence alongside other intelligence we have gathered, including from the middle tier and from schools themselves.

I agree completely that we must ensure we maximise the impact of the funding and continue to effectively support our disadvantaged learners. Any future evaluation will take the lessons we have learnt so far into account. For example, the majority of schools now have tracking systems in place and we also have further data sets spanning a number of years which will provide greater rigour. All of which will enable more robust analysis in the future. Consideration will be given as to how we can work with schools to fully utilise the data being collated and strengthen monitoring for future evaluation, work to develop new PDG guidance will consider what more can be done nationally to support this local level monitoring and evaluation.

Together with the longer term independent evaluations the Welsh Government has mechanisms in place for regular in-year monitoring. This includes:

- our Raising Attainment Advocate;
- termly Challenge and Review meetings whereby consortia report to the Government and are held to account for the

management of PDG and delivery of results; and

- half termly meetings between my officials and the consortia PDG strategic advisers, which focus on implementation, impact monitoring and peer mentoring.

In his capacity as Raising Attainment Advocate, Sir Alasdair Macdonald routinely visits schools across Wales. Sir Alasdair's wealth of knowledge and experience allows for continuous evaluation and identification of best practice. This provides real-time assessment at an operational level in contrast to time lag created with formal evaluation and data collection. A necessary balance to ensure continuous improvement of our systems.

The appointment of PDG strategic advisers has enhanced the role of the consortia. The advisers are supported and guided by Sir Alasdair. Their focus on the needs of disadvantaged learners will strengthen the support provided to schools. Our aim is to ensure the advisers have access to the necessary tools, including best practice, research, and data to raise the attainment of our most vulnerable learners. Importantly, they will also be required to strengthen collaboration across Wales to ensure that good practice is shared and built upon.

**R2: The Welsh Government should ensure there is coherence in its approach to targeting funding to improve educational outcomes, addressing any inconsistencies between the principle behind the PDG and the ending of other targeted education grants. In doing so, the Welsh Government should demonstrate the logic behind any differences in its approach.**

### **Accept**

As the Committee's report outlines, the Welsh Government took a central approach to the Draft Budget in 2018-19 to prioritise funding to Local Government for frontline schools and social care. As the Draft Budget progressed, steps were taken to confirm understanding and provide additional information as part of the scrutiny process, responding to the needs of the Committee and of stakeholders.

We have a clear and long-standing commitment to schools funding. Despite the UK Government's continued austerity programme and continuing reductions to the budget for Wales, we have taken action to safeguard local authorities' support for front line school services.

In past years we have taken action to reduce the number of individual education grants and have rationalised our grant funding to just two – the Pupil Development Grant, and the combined Regional Consortia School Improvement Grant, which contains all other regional consortia grant funding including the EIG. This year, we have extended this rationalisation approach to the grants provided to local authorities and will build on this over the coming years. We have also taken action to reduce the administrative and

management costs associated with our grants, for example moving grant funding to more outcome focused arrangements, reducing some of the reporting requirements and using existing system information such as consortia business plans and the regional governance structures to reduce additional reporting. As an example, the EIG maximum administration / management clause has reduced to just 0.75% of the total grant over recent years.

This demonstrates a balanced and considered approach, whereby we are cognisant of the need to minimise bureaucracy and administrative burdens, whilst also retaining some specific grants to oversee directly the delivery of outcomes in priority areas, including the PDG.

We work closely with local government and consortia to ensure our national priorities for schools are integrated into regional and local priorities for delivery.

**R3: The Welsh Government should take all steps to emphasise that the PDG is to be used to support all eligible learners, including those who are more able and talented. This should include updating its PDG guidance, issued in 2015, accordingly.**

**Accept**

I am pleased the report recognises that the Welsh Government has been clear in its expectations that the PDG should be used to support all eligible learners to progress. I have taken every opportunity to reiterate this includes more able learners too. I have asked the consortia PDG strategic advisers to ensure this is a priority.

We have made a number of changes to the PDG since I have been in post, not least to its name and my officials are working with the advisers to update and revise the current PDG guidance to ensure it remains relevant and accessible. This guidance will also reflect the need to ensure all learners needs are being met.

Going forward, the reformed evaluation and improvement arrangements will also reflect this approach and drive behaviours in our schools as we move to measuring the progress of individual learners. The interim measures remove the narrow focus on the borderline C/D grade allowing schools to refocus support for more able learners.

**R4: The Welsh Government should ensure Key Stage 4 performance measures and school accountability arrangements incentivise schools to support eFSM pupils in achieving as high grades as possible.**

**Accept**

As the Committee notes within its report, the Welsh Government has already taken steps towards this objective through the commitment to implement the 'interim measures' at Key Stage 4 from 2019. The approach of using measures that reflect attainment at all grades will incentivise schools to support *all* learners to achieve their best outcomes. Focussing on the progress of individual learners rather than on satisfying measures which drive unsatisfactory behaviour. A specific requirement is being introduced for schools to analyse differences in attainment between learners eligible for free school meals and those that are not; a really important development.

In the longer term, more whole scale changes are in development as part of the new evaluation and improvement arrangements that will be introduced alongside the new curriculum. A major driver in the design of these new arrangements is the desired steer away from a high stakes accountability system and the separation of accountability and school evaluation for improvement. This will help schools to identify, and allow schools to focus on, where support is genuinely needed without being led by the pressures of quantitative performance measures viewed out of context.

Prior to these future arrangements, and alongside the introduction of the 'interim measures', the Welsh Government will begin to tackle the pressure points within the system and address the culture around the use of, and understanding the purpose of, performance measures and how to use the data effectively. This, in the interim, should help ease the pressure on schools which has incentivised them to focus efforts on a narrow range of pupils rather than allocating support proportionately to address the needs of all pupils.

**R5: If the Welsh Government wants schools to use the PDG on pupils who have been eFSM at any point in the past two years, it should fund schools' PDG allocations on this basis, i.e. per pupil who has been eFSM at any point in the past two years, rather than expecting schools to support additional pupils from a grant allocation based on a one year snapshot of eFSM eligibility.**

### **Reject**

We have undertaken extensive modelling within the parameters of the existing overall quantum of funding, mostly recently in advance of confirming allocations for the current and next financial years. This resulted in what the Government considers to be the optimum, affordable allocation being implemented. However, we recognise there is a wider cohort of learners on the periphery that would also benefit from additional support. That is why, from April 2018 we have provided greater flexibility to schools by expanding the definition for use of the PDG to allow schools the flexibility to support learners who have been e-FSM in the previous two years.

**R6. The Welsh Government should consider adopting a longer-term timeframe for determining eligibility for the eFSM**

**PDG so that pupils who have been eFSM in the recent past can also be supported. The Welsh Government should investigate differing thresholds of eligibility, for example two, three, four or five years, against different amounts per child to arrive at an optimum, affordable model, taking into account the trade-offs involved.**

### **Reject**

As stated in our response to Recommendation 5, extensive modelling was undertaken to ensure we were providing the best solution for Wales as a whole. The Welsh Government analysed the impact of various models, including:

- extending eligibility criteria;
- increasing allocations;
- allocating funding using alternative data sets;
- fixing allocations; and
- minimum funding thresholds.

As a result, from April 2018 we were able to:

- provide a more flexible definition for use of the PDG, strengthening leadership and decision making in schools;
- increase the Early Years PDG by £100 per eligible learner to £700;
- implement a more transparent formula for EYPDG in primary schools;
- provide schools with greater security and sustainability for forward planning by fixing allocations until March 2020; and
- ensure all schools receive a minimum level of support, by allocating at least the rate of one pupil to every single school in Wales.

This work was carried out in partnership with consortia to ensure we were able to minimise any negative impact on schools.

**R 7. If the Welsh Government decides to continue with a one-year headcount for determining PDG allocations, it should allocate the 2018-19 and 2019-2020 PDG to schools according to the higher of their individual eFSM count from PLASC 2016 or the latest available.**

### **Reject**

This is not feasible because allocations for 2018-19 and 2019-20 have already been confirmed. Allocations were fixed for two years for schools to benefit from the stability longer term planning provides.

**R8: The Welsh Government should ensure that the recently appointed PDG lead officers within the regional consortia are proactive in monitoring, and challenging where necessary, schools' use of the PDG, in order to ensure maximum impact and value for money.**

**Accept**

The PDG strategic advisers are critical to the next stage of improvement and we want to ensure that schools utilise the advisers to the full, recognising the benefits they can bring to schools. Supporting, monitoring, and where necessary challenging, schools' use of the PDG is fundamental to the role of the advisers. This is explicit in the grant terms and conditions each consortia signs up to.

It is only by adopting this approach that we will be able to maximise the impact of the grant and embed best practice across the regions. Sir Alasdair Macdonald's support for the advisers is vital to ensure we continue to be pro-active and maintain momentum. Half termly meetings with the advisers are led by Sir Alasdair with a focus on progress including priorities; successes and best practice; and challenges. This also provides the advisers with continuous professional development to ensure they are well placed to support schools.

**R9: The Welsh Government should encourage and place an onus on schools to take full account of the available evidence and expertise on what constitutes effective use of the PDG, whilst enabling school leaders to take appropriate decisions for their own pupils. In doing so, the Welsh Government should work with Estyn to ensure it plays a full role in monitoring this.**

**Accept**

We expect the PDG strategic advisers to raise awareness of the evidence; tools; and best practice available. Their role is to support schools where needed to make effective decisions and evaluate the impact of those decisions and interventions. We will work with the advisers to ensure the new PDG guidance meets the need of schools.

We have recently launched [Sir Alasdair's blog](#), which reinforces the messages of what works in a quick and accessible way. The first post was issued on 31 July and has already had over 600 views.

Last year we worked with Estyn on its supplementary guidance for inspecting poverty and social disadvantage to support the inspection arrangements that came into operation from September 2017. We continue to work with the inspectorate to ensure schools support disadvantaged learners appropriately.

**R10: The Welsh Government should ensure that there are always effective systems and processes available to all schools**



**for tracking pupils' progress. The Welsh Government should ensure that the regional consortia provide clear advice and support to schools within their region on which methods are available.**

**Accept**

Tracking pupil progress was identified as a strength in good schools in the IPSOS Mori/WISERD evaluation. We will work with the PDG strategic advisers to ensure the new PDG guidance builds on this strength and that schools continue to improve their support for disadvantaged learners. Understanding the needs of both individual and groups of learners is key to supporting better outcomes. The intelligence gathered from tracking such data can be a pivotal to this and I have seen many excellent examples of such data being used effectively in schools across Wales.

**R11: The Welsh Government should urgently improve, through its PDG guidance and directions to consortia, how the PDG is used to improve eFSM pupils' attendance and engagement with their education.**

**Accept**

Our vision is to create an inclusive and engaging environment where learners feel safe and are ready to learn. If learners are going to benefit fully from their education, the experiences school offers, and reach their full potential, it is vital they attend school on a regular basis and engage once they are there. This is especially the case for disadvantaged learners where there is a greater reliance on school to provide enrichment and build aspiration.

We are working with stakeholders to identify what support and guidance are needed to enhance skills, knowledge and understanding to sustain and build upon school attendance. We are reviewing the All Wales Attendance Framework to ensure that arrangements continue to provide effective support to local authorities, schools, parents and learners, including disadvantaged learners.

We will also reflect on this in the context of work to revise the PDG guidance, which I expect to point to case studies of best practice, including in relation to attendance and engagement.

**R12. The Welsh Government should urgently improve, and place greater emphasis on, how the PDG is used to improve the engagement of eFSM pupils in order to reduce the number of cases where they receive fixed-term exclusions.**

**Accept**

*Education in Wales: Our National Mission* recognises the importance of learner well-being, placing it at the heart of the inclusive education system, and sets out our intention to strengthen collaborative working between mainstream schools and education

otherwise than at school (EOTAS) providers. EOTAS providers can provide a vital service to vulnerable learners in danger of becoming disengaged from education by providing bespoke and unique support to meet the untypical needs of challenging learners.

We have already amended our guidance to make clear that exclusion should be a matter of last resort when dealing with pupils with challenging behaviour – if we are going to tackle poor behaviour we must first understand the underlying causes. Effective tracking systems have an important role to play in early identification and intervention.

The Committee will be aware that the Education, Children and Communities, and Health Departments have jointly funded, with Public Health Wales, an Adverse Childhood Experiences (ACE) Support Hub. The Hub will increase the understanding of ACEs so that school staff can give the most appropriate support and intervention to vulnerable learners who may be at risk of becoming excluded from school or disengaged from education.

**R13. The Welsh Government should urgently investigate the widening of the eFSM/non FSM attainment gap in 2017 and learn and apply lessons from this at the earliest opportunity. This should focus on both the implications of the changes to performance measures in 2017 and how the PDG is used to improve eFSM pupils' resilience in the face of such changes.**

**R14. Whilst the Committee welcomes the Cabinet Secretary's action to encourage more appropriate entries for qualifications at Key Stage 4, the Welsh Government should investigate any unintended consequences and adverse effects on pupils, including eFSM pupils, who risk being unable to take vocational qualifications even where these are best suited for them. The Welsh Government should report back to the Committee by the end of 2018.**

**R15. Whilst the Committee understands the rationale for the Welsh Government's revision of Key Stage 4 performance measures in 2017 and 2018, the Cabinet Secretary should reflect carefully on the message this conveys regarding the value of vocational qualifications as opposed to general qualifications, particularly given the Welsh Government's commitment to a "parity of esteem". The Welsh Government should report back to the Committee by the end of 2018**

**R16. The Welsh Government should set out what action it has taken to minimise any potential adverse impact on the summer 2018 cohort, particularly eFSM pupils and Looked After Children, from the changes to performance measures in 2017 and 2018.**

**Accept**

It is important to note that we are in a period of much change in the education system in Wales. Where qualifications and

performance evaluation of schools are concerned, this is an extended period of transition. I am determined that we raise the standards for all of our learners and am continually reviewing all aspects of the system. This is why I have announced the introduction of the 'interim measures' at Key Stage 4 from 2019, which will move us to a more intelligent system of performance evaluation that has the learner at its heart, following on immediately from the revisions made to measures between 2016-18.

Analysis of the 2017 GCSE results was provided in the evidence paper submitted to the Committee ahead of its evidence sessions earlier in the year. This analysis also formed the basis of a discussion at my Ministerial Policy Board in May. Although it is too early to investigate the gap in attainment between eFSM and non-eFSM pupils in the first year's set of data against the revised performance measures introduced in 2017, lessons have been learnt and applied as we work to improve the resilience of all learners and ensure schools are better prepared.

Having analysed the data from the summer 2017 cohort, it was clear that there were schools that defied the trend with eFSM learners outperforming their non-eFSM peers. This information was shared with the PDG strategic advisers and PDG-LAC coordinators to allow identification of best practice to be implemented more widely. Working together we will undertake a similar exercise when the 2018 results are known to ensure we continue to raise awareness of the need for specific focus on these groups of learners to build their resilience and seek to mitigate any adverse impact.

By directly comparing data for 2016 and 2017 incorrect assumptions can be made and flawed conclusions drawn. A change in definition to a performance measure can suggest a change in outcomes whereas, in reality, the outcomes for an individual may not have changed, but what has changed is how the data is framed. The changes to composition of performances measures in 2017 were introduced to encourage different behaviours at a school level, and also to pitch attainment data in a more appropriate way which is in alignment with national priorities.

Qualifications Wales' priority during summer awarding is to align standards for each subject and over time. In short, it should be no easier, or no more difficult, to get a particular grade from one year to the next. I invited Qualifications Wales to my Ministerial Policy Board in May to discuss how they ensure fairness and maintain relative stability over time. Changes to the Key Stage 4 performance measures between 2016 and 2018 have been implemented in response to the recommendations made in the Review of Qualifications for 14-19 year olds in Wales (2012), which was a widely consulted on. The recommendations aimed to improve outcomes for all learners.

The ensuing changes have resulted in behaviours being adapted at a school level in both intended and unintended ways. A perceived widening of the gap can be seen for Science. From 2018, the Science specific requirements in the performance measures have focussed on GCSEs only. This move to emphasising Science GCSEs has resulted in many more learners being entered for a Science GCSE this year, thus providing many more young people with the opportunity to attain a qualification that

enables them to progress to A level and University and pursue Science related careers. It is the case, however, that schools are still able to enter pupils for other vocational qualifications if it is the best option for the individual learner, and that those vocational qualifications may still count towards the school's performance measures outside of the subject specific parts.

As we move to the new interim measures, the approach of using measures that reflect attainment at all grades will incentivise schools to support all groups of learners to achieve their best outcomes.

The interim measures are less prescriptive and more open to local choice. The subject specific parts of the Capped Points Score will be reduced to three slots, meaning that there will be six slots with no constraints on the contribution of non-GCSEs, allowing more freedom for schools to deliver the curriculum most appropriate to the individual learner. Going forward, new evaluation and improvement arrangements will be brought in alongside the new curriculum. Through this we are targeting the pressures in the existing high stakes accountability system and intend to separate accountability and school evaluation for improvement. This will help schools to identify and focus on where support is genuinely needed without being led by the pressures of quantitative performance measures viewed out of context.

I want to make it very clear we do value vocational qualifications. We want what is best for each and every learner in Wales, whether that's a GCSE or vocational qualification. We expect schools to offer the most appropriate qualifications to their pupils; however, it is clear from the data that in too many cases pupils were not being entered for the most appropriate qualification. The new arrangements I've outlined will ensure all pupils are entered for the qualification that best suits them.

Turning specifically to the position of vocational qualifications within performance measures, they can still be counted in existing Key Stage 4 *threshold* measures but are subject to a volume limit from 2017 (only 40% of each threshold measure can be made up of non-GCSE qualifications). This ensures a proportional recognition of attainment of vocational qualifications, without precluding them entirely. Again, this approach was introduced in response to the recommendations made in the Review of Qualifications for 14-19 year olds in Wales, which recognised the inclusion of vocational qualifications in Key Stage 4 measures at the time distorted choice and incentivised take-up levels not in the best interest of learners. It should be noted that the existing Capped Points Score has no limit on the volume of vocational qualifications that can count in the measure, outside of the current five specified subject specific slots, which are GCSE only.

Clearly, this is a complicated area with far reaching consequences. I am pleased that in Wales, we send a clear message that vocational qualifications are valued, with the cap on their value in terms of performance measures being twice what was introduced in England following the [Wolf Review](#). Going forward, I am satisfied the arrangements I have described will put in place appropriate checks and balances. And prior to these arrangements taking effect, the introduction of the 'interim measures' will begin to tackle the pressure points within the system and address the culture around the use of, and understanding the purpose of,

performance measures and how to use the data effectively.

I will write to the Committee again in the New Year, following the publication of the verified 2018 GCSE results in December, with an update of evidence paper I submitted to you earlier this year.

**R17. The Welsh Government should publish any impact assessment it has carried out regarding its decision to change Key Stage 4 performance measures from 2018/19. If no impact assessment has been carried out, the Welsh Government should explain the rationale for this.**

**Accept**

Over the past two years we have been engaging and holding extensive and open discussions with secondary heads across Wales, as well as with key organisations such as unions and regional consortia through the form of meetings, conferences and workshops. This process has been much wider than a single impact assessment; the 'interim' Key Stage 4 performance measures have been shaped together with the sector and are the result of intense policy discussions and evaluations over a two year period.

A primary focus in revising our interim approach to Key Stage 4 performance reporting has been on removing the constraints placed on schools via the publication of a set of performance measures that have disproportionately emphasised the attainment of one group of learners. As explained above, the introduction of these interim measures moves us closer to the more whole scale changes being made with the development of new evaluation and improvement arrangements, which has been and continues to be carefully constructed in partnership with the profession, local government, consortia, OECD and the unions.

**R18. The Welsh Government should ensure that its new interim school performance measures at Key Stage 4 from 2019 do not have any unintended consequences or particular implications for specific cohorts of pupils, including annual cohorts who are amongst the first affected, Looked After Children and eFSM pupils in light of the objective to close the attainment gap.**

**Accept**

As I have said above, the interim measures and the associated work we are carrying out will aid schools in supporting all groups of learners to achieve their best outcomes and reach their own individual potential. We are removing constraints that currently exist within the performance evaluation system that, whilst incentivising schools in one way, in some cases result in an additional consequent behaviour that can disadvantage learners. Easing the pressure placed on schools in terms of attainment results in isolation will enable them to focus on their individual learners' needs and remove the risk of measures driving behaviours resulting

in unintended consequences.

The interim performance measures, which will be reported on from 2019, have been designed to remove the narrow focus on borderline C/D grade pupils and shift the focus to raising our aspirations for all learners.

All schools will be expected to self-evaluate against points scores, plus the average points score for both eFSM and non-eFSM learners, along with the performance of boys and girls, to ensure that every child counts and that we value the progress of all pupils across the cohort.

We have been working closely with the consortia, and are continuing to do so, to support schools in the implementation of the new interim measures.

We will continue to facilitate schools' analysis of their attainment data and work with data and performance leads in consortia and local authorities to help support schools in this endeavour as part of their self-evaluation.

**R19. The Welsh Government should ensure there is an effective, strategic approach to using the Looked After Children and adopted children PDG, giving due consideration to ICF Consulting's evaluation and subsequently making any improvements which are identified as necessary.**

**Accept**

Given the particular barriers that care experienced young people often face in terms of their education, the PDG for looked after and formerly looked after children is a vitally important element of the grant. The grant being administered by the consortia helps ensure a strategic approach is taken to management of the grant, which is important given the transient nature of the group and also the acute needs of some of these learners.

ICF Consulting's evaluation is currently being finalised and will be published later in the autumn. In advance of publication of the evaluation, work has commenced with consortia and local authorities to consider how the model can be developed to ensure the opportunities presented by the grant for supporting these learners are maximised. The focus of this work is ensuring the model is as effective as possible and also that there is greater national consistency, which is not currently the case across the board. I expect this work to conclude in advance of the next financial year, and ICF's findings will be essential in informing it.

**R20. In conjunction with the regional consortia, the Welsh Government should ensure that the PDG for Looked After Children and adopted children is used specifically for these groups of pupils. In doing so, the Welsh Government should take account of relevant aspects of ICF Consulting's evaluation report.**

**Accept**

The Welsh Government accepts that, first and foremost, the PDG-LAC should be used for those intended to be direct beneficiaries. That is looked after and formerly looked after children. Individual interventions funded through the grant, which should be put in place to meet the identified needs of individual or groups of learners, will only be available for those direct beneficiaries. It is the case though, that many of the whole class/school interventions and capacity building activities that are known to benefit care experienced young people also benefit a wider cohort of vulnerable learners. Activities around attachment and ACEs, which the Committee heard about during its evidence gathering sessions, are examples of this and have been put in place by consortia and positively received. This represents an effective and pragmatic use of the grant, ensuring maximum impact and value for the funding and benefitting the widest possible group of learners.

I am not persuaded that any narrowing of this approach is appropriate. However, I recognise the risk of overstretching or diluting the funding and this will be considered as part of the work underway to review the current PDG-LAC model. Any findings from the independent evaluation on this point will of course be considered.

**R21. The Welsh Government should urgently consider how the PDG can be used for improving Looked After Children's engagement with their education, including attendance rates and exclusion rates. This should take into account the conclusions of ICF Consulting's evaluation.**

**Accept**

The position above outlined in response to recommendations 11 and 12 in respect of eFSM learners applies equally to looked after and formerly looked after children. Any relevant findings from ICF Consulting's evaluation will be considered in the context of the ongoing work outlined above.

**R22. The Welsh Government should review data on Looked After Children's attainment throughout the lifetime of the PDG and the implications that changes to performance measures might have had. The Welsh Government should publish its assessment of this, and consider how the PDG can deliver greater impact in terms of improving Looked After Children's educational outcomes.**

**Accept**

I agree that we must continue to keep under review and be satisfied that the PDG is delivering the greatest possible impact in terms of supporting the educational outcomes of looked after and formerly looked after children. The forthcoming evaluation is an

important milestone and we will fully consider the recommendations of that report in the context of the work I have described to review the PDG-LAC model.

I have committed to update the evidence paper submitted to the Committee in March and to write to you with this in the New Year. I have asked my officials to consider to what extent this paper can also include looked after children. I would at this point like to flag to the Committee the particular challenges looked after children data presents when undertaking any analysis, for example, sample size and those in care for a short period of time.

**R23. The Welsh Government should extend the PDG to include children who have been looked after for any significant period in their lives. The Welsh Government should fund allocations to the regional consortia accordingly and ensure that the consortia also target the PDG at these pupils. In doing so, the Welsh Government should decide what constitutes a significant period, including giving consideration to the Committee's suggestion of any period of 13 weeks or more, as is used for determining eligibility to after care services for former Looked After Children.**

#### **Accept in Principle**

Whilst I accept the rationale behind the recommendation; further cross-Government consideration is required in order to determine whether or not it is feasible. I have asked my officials to work with their counterparts in the Social Services and Knowledge and Analytical Departments to understand the implications that would flow from implementing the Committee's recommendation. I should say that, if implementation of this approach is considered viable, it would not take effect until April 2020 as allocations have already been confirmed for the current and next financial years.

**R24. The Welsh Government should put in place a mechanism from academic year 2018/19 to enable parents to inform schools when their children are adopted children and to have that information gathered and added to the child's school record. This information should then be used to target support under the PDG at pupils known to be adopted children and to enable individual pupil educational outcomes for adopted children to be monitored in a similar way to Looked After Children.**

#### **Accept in Principle**

Whilst I fully accept the rationale behind the Committee's recommendation, the practical implications and complexities require thorough consideration. In particular, the implications of the recent General Data Protection Regulations will need to be considered before taking forward any data collection of this nature. However, in readiness for the new school year I have written to all



headteachers, via the Dysg newsletter, highlighting that adopted children can sometimes face barriers to learning and how it is important that schools know who their adopted children are so that they are able to put in place appropriate support. In my letter, I made clear that in doing so it is imperative that schools also clearly recognise this will be a sensitive issue for some adoptive parents and any actions taken must be child centred and with the support and agreement of parents. We will continue to keep this matter under review and explore how we can further breakdown any barriers.

**R25. The Welsh Government should ensure that it funds its allocations of the Looked After Children and adopted children PDG to each regional consortia per Looked After Child and known adopted child in each region. Where the number of adopted children is not precisely known, a best estimate should be used.**

**Reject**

Given the links between this recommendation and recommendation 24, implementing it at this point is not viable. That is because there is currently no robust education data on adopted children on which to base such a calculation. I am, however, happy to continue to keep this matter under review.

**R26. The Welsh Government and regional consortia should monitor pupils' educational outcomes in the schools which participated in Schools Challenge Cymru and take steps to mitigate against any potential loss of momentum in those schools which made progress.**

**Accept**

Existing mechanisms are in place to address this recommendation. The consortia monitor the outcomes of all schools. That will be on the basis of the interim performance measures from 2019 and, in due course, in line with the new evaluation and improvement arrangements which are currently being developed. The Welsh Government monitors consortia through the Challenge and Review process.

Where a School Challenge Cymru school is causing concern or requires support, this will be provided through the consortia.

**R27. Any future school improvement programme should run for a sufficient period of time to enable it to have durable, long-term impact, usually for longer than three years, The Welsh Government should not, other than in exceptional circumstances, discontinue a programme such as Schools Challenge Cymru, before knowing the results of any evaluation it has commissioned.**

**Accept in principle**

Whilst I accept the rationale behind the Committee's recommendation, and would as a principle subscribe to long term improvement programmes running in accordance with evaluations, such decisions inevitably need to be taken on a case by case basis.

**R28. The Welsh Government, in conjunction with the regional consortia, should engage with the key players involved in delivering Schools Challenge Cymru, including Professor Mel Ainscow, to discuss what lessons can be learnt from the programme and other school improvement initiatives and subsequently apply these more generally across all schools requiring improvement**

**Accept**

Retaining the expertise and sharing the learning from Schools Challenge Cymru has been an important building block in our school improvement agenda. The transfer of information and transition of staff, for example, have been particularly important and I am pleased that a number of key Schools Challenge Cymru are still working in the system. For instance, Sir Alasdair Macdonald (former SCC champion) continues to act as our Raising Attainment Advocate and many former SCC advisers have been retained within consortia, ensuring a transfer of their knowledge and experience into day-to-day school improvement working. I agree it is vitally important we learn from previous programmes to ensure continuous improvement in the future and I have asked my senior officials to continue dialogue with key players previously involved with Schools Challenge Cymru. We are also looking forward as well as back – we are building capacity within the system and now engaging through broader range of stakeholders, including the OECD.

**R29. The Welsh Government should closely monitor and evaluate how regional consortia provide challenge and support to schools requiring improvement, particularly those which participated in Schools Challenge Cymru. This should include asking Estyn to include this in its inspections and monitoring of the regional consortia.**

**Accept**

The Challenge and Review process allows the Welsh Government to review consortia support across the region, both at a regional level and drilling down to individual schools where necessary, for example in terms of Schools Causing Concern.

You will be aware that a report on the review of Estyn was published in June. The review was commissioned by Her Majesty's Chief Inspector to determine the implications of our reforms on the future role of the Inspectorate.

My officials are working with Estyn and the wider education system to consider the recommendations and their implications for our reform process. There will be a period of formal and informal consultation with stakeholders to gather views on the recommendations.

**R30 The Welsh Government should keep the sufficiency of funding for school budgets under review and consider how this impacts on schools' regard for, and use of, targeted funding such as the PDG.**

**Accept**

Whilst I accept the rationale behind the Committee's recommendation, it is important to note that the Welsh Government does not fund schools in Wales directly. Schools funding is the responsibility for Local Authorities, as is set out in law. The majority of funding which we provide to Local Government to support Authorities in discharging their duties, is un-hypothecated and delivered through the Revenue Support Grant. It is for Local Authorities, from all the sources of funding available to them, to set their budgets, including for schools and for school support services.

I share some of the Committee's concerns on this matter and I am equally alive to the concerns of Local Authorities on the overall budget position and the challenges created by the UK Government's prolonged commitment to austerity.

We will continue to keep under review the sufficiency of our hypothecated education grants, where funding is directed to schools, and will work with Local Government to influence local decisions on the funding for schools. I fully welcome the Committee's planned inquiry into the sufficiency of schools funding.

**R31: The Welsh Government should provide, on both an individual and aggregate basis, a list of budget expenditure lines (BELs) within the Education MEG which predominantly finance the raising of school standards, for 2016-17, 2017-18 and 2018-19, as well as commit to doing so for the remainder of this Assembly term.**

**Accept**

As part of budget scrutiny we already provide the CYPE Committee with budget tables at BEL level and from 2018-19 the Draft Budget is also published at BEL level, something which we will continue to do for the rest of the Government term.

Our education BELs are clear to see and the additional funding we provide as part of our commitment to invest an additional £100 million to raise standards over this term is held exclusively within its own BEL, the Raising School Standards BEL. A breakdown is being prepared for the Committee as part of our budget scrutiny evidence submission, this will also include information on 2019-20.

In respect of the Local Government and Public Services MEG, funding provided to Local Government through the Settlement

Revenue Support Grant is unhypothecated. We publish annually our Standard Spending Assessments and Indicator Based Assessments (IBAs) to show how the Revenue Support Grant is calculated but we also make very clear that these assessments are not spending targets. The Settlement is unhypothecated and the IBAs are our assessment of the relative need to spend across all authorities and across all services and include an assumption on future Council Tax income. It would be incorrect to show any hypothecation within the Settlement support. Separately we do publish information on Local Authority Budgeted Expenditure on Schools and outturn data and we will continue to do this.