



Save the Children Submission to the Children and Young People's Committee on The School Standards and Organisation (Wales) Bill

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INTRODUCTION

1. Save the Children welcomes the opportunity to provide a submission to the National Assembly for Wales, Children and Young People Committee on the School Standards and Organisation (Wales) Bill (the Bill). The Bill outlines a detailed legislative programme which consolidates existing legislation as well as giving additional powers to both local authorities and Welsh Ministers.
2. The Welsh Government has stated that the aim of the Bill is to make the legislative framework for education in Wales simpler and more understandable for both professionals and the public in order to raise and ensure more consistency of school standards in Wales, this is broadly welcome.
3. Save the Children is campaigning for an end to child poverty in the UK. We believe that action is needed now if we are to meet the 2020 target.
4. Save the Children believes that we will never break the cycle of poverty between generations unless children growing up in the very poorest homes are helped to develop their talents and realise their potential. A child's chances in life should be determined by their ability and effort – not by their background and family income.
5. The Welsh education system must deliver for the most vulnerable children in our society. Childhood only happens once. We must prevent poverty by ensuring all children have access to a quality education that supports them to reach their potential.

6. We welcome that reducing the impact of poverty on educational attainment is one of the Welsh Government's three national priorities for education. Our recent *Communities, Families and Schools Together* report¹ has explored the extent and causes of the poverty gap in Wales and explores how a holistic and mutually reinforcing approach which brings together families, schools and communities could be part of the solution.
7. Our submission will therefore focus on the areas where the Schools Standards and Organisation (Wales) Bill can support this agenda and make a key difference to child poverty and to mitigating its impacts on educational attainment.

Intervention & School Improvement

8. Save the Children broadly welcomes moves – through the new banding system- to embed in the Welsh Education system, the rigorous analysis of performance data on schools on a consistent basis². We welcome the move to provide clear guidance to schools to assist them in the transition to the new schools banding system and the stated intention in the Bill that the Welsh Government Schools Standards Unit will work to 'develop a systematic methodology to identify best practice' and to ensure its effective implementation into other schools.
9. It was reassuring to see that in the Bill includes all three national priorities are mentioned and receive equal attention; the omission of the third priority of reducing the impact of poverty from the initial consultation document was an issue that we highlighted as an area of concern.
10. Through our educational attainment theme of work Save the Children has been calling on the Welsh Government to identify and raise awareness of an accredited list of evidence based techniques and programmes that schools and local authorities can implement as part of a holistic and mutually reinforcing approach to achieving the third National Priority of reducing the impact of poverty on educational attainment.
11. We therefore welcome the Bill's statement that the School Standards Unit is working to identify a range of high quality materials and resources to support teachers and help them to develop their practice focusing on **all three** national priorities of literacy, numeracy and reducing the impact of poverty on attainment.
12. Using the School Improvement Guidance to include a list of evidence based techniques and interventions that work in raising the performance of schools across the board and that can support the development of School Development Plans is something that Save the Children supports and would ensure that, particularly in respect to the third

¹ Egan, D (2012). *Communities, Families and Schools Together: A Route to Reducing the Impact of Poverty on Educational Achievement in Schools Across Wales*. Cardiff: Save the Children Wales.

- national priority, SEG funding and PDG funding can be used in the most effective way possible.
13. Save the Children's recently published report by Professor David Egan³ highlights our specific recommendations and explores the extent and causes of the persistent 'poverty gap' in Wales' schools and outlines a range of solutions that could be adopted by Welsh Government, Local Authorities and Schools in Wales.
 14. In order to give this best practice the best chance of 'travelling' between schools; it is also important that the central role of involving the community and parents in the education system is recognised. It will be an important element to sustain and cementing good practice as highlighted in the 'Communities, Families and Schools Together' report. The potential offered by the reconfigured Communities First programme, Families First and the extension of Flying Start must not be underestimated in this aspect.
 15. We also believe that more guidance needs to be provided to schools and local authorities on the SEG Grant, particularly on how the grant should be split between the three national priorities and the rules for expenditure i.e. that it is not limited to spend inside the school gates. We have received anecdotal reports from practitioners that they are unclear about the rules and would be unsure what exactly SEG funds could be spent on and we worry this might prevent the funds being used in the most effective way possible. Guidance on how the SEG funding and PDG funding may support each other would also be helpful.
 16. We would however recommend that interventions and best practice in 'reducing the impact of poverty on education attainment' are given specific and separate attention. The persistent and stubborn nature of the link between poverty and attainment means that it should form a central part of any school improvement guidance.
 17. Save the Children would evidently like to see a focus on supporting the most disadvantaged parents (particularly at key transitions) to be able to access help so that they can develop the knowledge and confidence to support their child's learning at home.
 18. Save the Children is currently working to develop and grow its Families and Schools Together Programme⁴. FAST has now completed 7 cycles in Wales. FAST is based on

³ Ibid.

⁴ FAST was introduced as a pilot in England 3 years ago and Save the Children has supported 15 FAST projects in 14 primary schools across the UK between April 2010 and August 2011. In Wales, FAST was piloted in Upper Rhymney and Markham in Caerphilly in 2010. In these initial pilots, in total 41 families attended at least once and on average 83% of those families attended at least six of the eight sessions and graduated. We are currently running. FAST is an after-school, multi-family group programme which is offered to all children and their families in a school year group. The course runs for eight weeks and participants are encouraged to take part in a peer-support network for at least two years on completion. The programme is a socially inclusive intervention that brings together family, home, school and community to increase family well-being and improve children's performance at school.

international evidence of what works⁵. We are calling for the Welsh Government to investigate making FAST an entitlement in many more deprived communities in Wales. We believe that it is an intervention that could provide a bridge between the Flying Start and Foundation Phase Welsh Government initiatives to support children through their adjustment to the first years of Primary School.⁶ We would like to see this sort of evidence-based technique and programme included in the new statutory guidance for school improvement.

19. Finally, we would highlight the need to accompany the School Improvement Guidance with a method of regularly updating and assessing any guidance to ensure that innovation and new ideas is recognised and can be reflected in the guidance received by schools.

Reducing Bureaucracy

Annual Parents Meetings

20. The Bill proposes to remove the obligation on governing bodies to organise an annual Parents Meeting unless parents requested it.
21. Save the Children welcomes the recognition of the importance of parental engagement and broadly understands the desire to reduce bureaucracy and to ensure that the most effective methods for parental engagement are in place.
22. However, placing the onus for requesting a meeting with Governors onto parents overlooks significant literature⁷ which highlights a number of findings about the link between parental involvement in children's educations and educational outcomes. Key findings show that the extent and form of parental involvement is strongly influenced by factors including family social class, maternal level of education, material deprivation, maternal psycho-social health, single-parent status and, to a lesser degree, by family ethnicity. Differences between parents in their level of involvement have been clearly associated with social class, poverty, health and also with parental perception of their role and their levels of confidence in fulfilling it.
23. Our concern would be that shifting the responsibility onto parents to request a meeting could risk further excluding those parents who are least likely to become involved in

⁵ FAST was developed in 1988 by Dr Lynn McDonald (who is currently Professor of Social Work Research at Middlesex University, London). FAST was recently introduced in England (2009), but has been systematically replicated across 2,500 schools in 15 countries. Based on randomised controlled trials and replication studies, FAST has been reviewed and identified as an evidence-based family skills programme by governments in the UK, the US and the UN.

⁶ Save the Children (2011). *Bringing Families and Schools Together: Giving Children in High Poverty Areas in Wales the Best Start*. London: Save the Children.

⁷ Desforges, C and Abouchar, A. (2003). *The Impact of Parental Involvement, Parental Support and Family Education on Pupil Achievements and Adjustment: A Literature Review*. London: DFES. Available at:

http://www.bgfl.org/bgfl/custom/files_uploaded/uploaded_resources/18617/Desforges.pdf

their children's education due to the factors set out above; we would recommend specific consideration of this eventuality during consideration of the Bill.

24. Currently, schools are required to notify parents of the annual governors meeting. Within the new arrangements we would recommend that the Committee explores whether there needs to be a requirement that schools notify parents of new arrangements and regularly remind parents of their entitlement of arrange a meeting with Governors. A clear and accessible process for doing so needs to be put in place. This will be particularly important to support the participation of those 'hard to reach' parents who may be less likely to seek out opportunities to become actively involved in their child's education.

Proposals in Relation to School Breakfasts

25. The Bill proposes to transfer funds for Free Breakfasts to the RSG underpinned by legislation to remove the need for the lever of a ring-fenced grant.
26. Save the Children welcomes the commitment in the Programme for Government that the Free Breakfast Scheme will continue as part of the Welsh Government's tackling poverty approach.
27. Save the Children broadly welcomes the desire to reduce the bureaucracy for local authorities in running the Primary Breakfast Scheme and if this move should increase take up and provision of the scheme, then it is to be supported.
28. However shifting funding for the Free Breakfast Scheme to the RSG must not affect the level and quality of service currently being provided, we would regret any threat this could pose to the aim of universal provision of free breakfasts.
29. We have reservations about the statement that *'given that the vast majority of schools that want to participate have already signed up (71% of schools are currently involved) schools signing up each year has gradually decreased since 2007-2008. It is anticipated that this decrease will continue and as such the Welsh Government's intention is to transfer the specific grant funding to the RSG. We would highlight that this means that 29% of schools in Wales still have no free breakfast service after more than 6 years which raises a series of questions for us about which children are not accessing the scheme (we do however note that 100% provision may not be achievable or appropriate).*
30. Save the Children believes that the Committee should consider whether it will be necessary for Welsh Government to issue guidance containing a full and exhaustive list of criteria for where it would be 'unreasonable' for an LA to discharge its duty and this should be made available at the earliest opportunity – we therefore the suggestion that such guidance may be issued to building on current guidance no.021/2008 *'Local authorities and governing bodies must have regard to any guidance issued by the Welsh Ministers'*.
31. This should also be accompanied by a clear strategy for enabling and promoting the establishment of new school-breakfast schemes and analysis of the characteristics of the

- children that are currently accessing the schemes within schools across Wales and any reasons for declining demand.
32. We are concerned that there is currently no detail on how to measure take up by children in low-income families and would recommend that this could be an area that the CYP committee could explore in more detail.
 33. This was a key recommendation of the NAFW Children and Young People's Committee in their Eradicating Poverty Through Education report (2009) which found that a system for monitoring take up of free breakfasts should be implemented. However, the Welsh Government makes no mention of this in the specific changes that it is proposing to the primary school free breakfast initiative. Save the Children believes it to be imperative that some specific mechanism for monitoring take up should be established, especially to track levels of take up by children from low-income families.
 34. We would highlight that attention to this area would be in line with the new duty on Welsh Government Ministers under the Rights of Children and Young Person's Measure (2011) to pay due regard to the impacts of their decisions on children and young people. Under the UNCRC state parties should target resources towards those most in need of them and take positive steps to ensure that rights and services are accessible to **all** children.
 35. Save the Children welcomes the desire to ensure that the content of breakfasts under the scheme comply with the regulations made under the Healthy Eating in Schools (Wales) Measure 2009. However, we would recommend that there should be clear guidance and a means of monitoring effective compliance by schools.

School-Based Counselling

36. Save the Children is strongly supportive of the provision of school-based counselling in schools in Wales.
37. We are convinced that school-based counselling helps to support the health, emotional and social needs of young people as well as supporting their learning. The early and easy access to counselling service can help mental health problems developing or escalating. School-based counselling can be an effective means of reducing and alleviating the effects of pressures caused by poverty and deprivation and therefore contributing to closing the attainment gap.
38. Any shifts of the funding for school-counselling to the RSG must not affect the level and quality of service currently being provided.
39. Save the Children welcomes the provision given in the Bill to *'give effect to any future policy intention to extend counseling services to other categories of persons, for example primary pupils in year 5 and below'* - children deserve to get all the support they need at the earliest possible stage. By acting early we can prevent problems from escalating and help children to thrive.

40. We would wish to see the success of the school based counselling scheme extended to support young people in further education and young people who are unemployed, we therefore welcome *the mention of students in further education who may not be able to access counseling via their further education provider.*

Flexible Charging for Free School Meals

41. Save the Children is concerned that many children living in poverty are still not entitled to free school meals.
42. Furthermore we are concerned by persistently low levels of take up of free school meal entitlement. Findings by the Welsh Assembly Children and Young People's Committee in February this year; that the average take of-up of free school meals in Welsh secondary schools is just 68% show the role that stigma can play in limiting take up of entitlement. Several key child poverty organisations have collectively campaigned for universal free school meals to eradicate stigma and bullying, improve take-up whilst also reducing financial pressure on families⁸. Save the Children supports universality as the best way to overcome stigmatising in schools and to ensure that those children living in poverty who do not qualify for free school meals under the current system are not missed.
43. In the absence of the provision of universal free school meals, Save the Children welcomes moves to facilitate flexible charging for school meals which is designed to make school meals more affordable families, especially those from low income groups.
44. We welcome steps to remove the requirement to charge every person the same price for the same quantity of the same item, should allow schools and local authorities to help vulnerable families, especially those families with a number of children in school.
45. We welcome the discount for the cost of meals for have more than one child attending schools but It is not clear whether the discount would only apply if the children in the family attend the same school? Will it also apply if children attend schools in different local authorities?
46. A concern with this move is that it is not clear whether the two circumstances cited in which this flexibility would most likely be used are mutually exclusive.
- a. to discount the cost of meals for a limited period for the new intake in infant, junior and primary schools;
 - b. to discount the cost of meals for families where there is more than one child wanting school meals.
47. Save the Children would also welcome clarity about whether a local authority will be required to choose one option or another. We would also ask whether there is any

⁸ CPAG (2006), End Child Poverty Network Cymru.

evidence or whether there will be any evaluation of which option would be most effective in supporting vulnerable families and/or increasing uptake.

48. Save the Children would request further clarification about the 'limited period' – what is the time period that the offer would apply for?
49. The introduction of a cap on how much a pupil is charged so that it does not exceed the cost of providing the meal is welcome. This will especially avoid the eventuality that one group of pupils could be charged at a higher rate to subsidise another group at another group at a lower rate.
50. Save the Children's Welsh Young Ambassadors (a group of young people supported to speak out on issues that they feel strongly about, and to work to ensure their voices are heard in decisions that affect them) selected Food Poverty as a key campaign issue for 2011. They have worked to develop a film on their personal experiences of Food Poverty to launch their campaign. One of the key issues that they have raised consistently during the scoping and development of their campaign is the quality and cost of their school meals.
51. We would however urge that in implementing this change, issues of stigmatisation evidenced by the low take up of free school meals are taken into consideration.
52. The move to introduce flexible charging could also improve the accessibility of healthy school meals to more pupils. This is particularly important given well recognized links between nutrition, child poverty and attainment. That it could encourage more parents to 'try out' school meals and therefore increase take up is also welcome.

General Points – Participation of Children and Young People

53. Save the Children would also like to highlight concerns that only 13 responses were received to the children young people's questionnaire. We would argue that this level of engagement with children and young people on this issue that directly affects them is insufficient under Article 12 UNCRC and the Welsh Government's new duties under the Rights Measure.
54. We would recommend that steps are taken to increase the participation of children and young people to ensure that their views and opinions are captured during the passage of the School Standards and Organisation (Wales) Bill and would suggest that the Children and Young People's Committee explores ways to do so; a key way to do this would be to conduct a consultation exercise with all School Councils in Wales.
55. As Chair of the Children & Young People's Participation Consortium for Wales we would point out that in order to have a rewarding experience, children and young people need to be able to voice their opinions, feel accepted, safe and respected. The National Children and Young Peoples Participation Standards for Wales provide a benchmark against which to measure and improve the quality and process of participation of children and young people in service development consultation, and we

strongly recommend the standards are included in final guidance and in all ongoing engagements with children and young people on school standards.

56. To make sure that the voices of different groups of children, families and communities are listened to as part of consultations around the development of the Schools Standards and Organisation (Wales) Bill, **Save the Children would recommend that it is necessary to undertake consultation using multiple different methods.** The method and style of consultation should be chosen to suit the group being consulted with, and the options for potential consultation methods are huge and varied. Traditional methods include surveys (online, postal or via telephone) focus groups, public meetings and suggestion boxes. Alternatives include;
 - a. the creation of websites for ongoing consultation with children, families and communities on local play opportunities
 - b. outreach – getting out onto the street to listen to the views of the public (including children)
 - c. picture voting with different groups of children and young people

57. It is important not to rely on one method of consultation; **using more than one method increases the chances of better results, both in terms of quality and quantity.** It can also be useful to use one approach to develop another - i.e. use picture voting or focus groups to investigate in more detail trends which emerge from a survey.

58. The Participation Unit at Save the Children has produced best practice guidance which suggests processes to improve access to engagement with hard to reach groups. The guide is freely available to view here and may be useful for local practitioners to consider when planning their local consultation. http://www.participationworkerswales.org.uk/userfiles/file/STC_E_blast_off_guide_7.pdf

59. The National Children's Bureau has produced a useful guide entitled '**Consulting Children About Play**'. The guide contains a number of different tips, tools and methods for consulting children specifically about play provision and we recommend that practitioners consider the guidance when planning their local consultation. http://www.ncb.org.uk/media/124848/no.7_consulting_children_about_play.pdf