



WLGA & ADEW Consultation response to the Children, Young People and Education Committee's Inquiry into School Improvement and Learner Attainment.

May 2025

INTRODUCTION

- The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities and three fire and rescue authorities are associate members.
- The WLGA is a politically led cross-party organisation, with the leaders from all local authorities determining policy through the Executive Board and the wider WLGA Council. The WLGA also appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.
- The WLGA works closely with and is often advised by professional advisors and professional associations from local government, however, the WLGA is the representative body for local government and provides the collective, political voice of local government in Wales.
- This response has been informed by the knowledge and expertise of the Association of the Directors of Education in Wales (ADEW). As such this is a joint consultation response on behalf of the WLGA and ADEW and represents the collective views of local authorities in Wales.

AREAS OF FOCUS

The future of school improvement arrangements and how the Welsh Government, local authorities and relevant partners work together to deliver the highest possible standards of education.

Overall, WLGA and ADEW have welcomed the engagement and consultation undertaken with officers and school-based colleagues over recent months. This activity has facilitated effective dialogue between the Welsh Government, local authorities and schools.

The new School Improvement Partnership approaches are still however in a transitional phase with the gradual shifts in responsibilities, winding down of previous provisions, and role changes underway. Many of the details are still under development within different regions. Councils should be able to provide further updates in the Autumn term. These significant changes are of course already taking place within a period of major education reform in Wales. This does in turn place additional pressures on councils and schools who are experiencing reform fatigue. The expected pace of change, within the context of delivering all the other major changes, is not practicable. It is felt that there is a lack of recognition of the pressures that local authority staff are under, particularly when resources are limited.

Understanding how the new Professional Learning body will provide consistent training opportunities across Wales alongside regional and local provisions will also be key to improving outcomes. It is expected that this Professional Learning body will start to become operational by Autumn 2025, with all schools expected to engage in collaborative improvement partnerships by April 2026. Without the central team in place yet, some of their programmes of work are unclear and this means schools, school leaders and local authorities must mitigate some of the gaps in the short and medium term. Understanding the strategic plan and approach to reducing inconsistencies across Wales is important in terms of ensuring there is equity in the school improvement and Professional Learning support offer. Furthermore, ADEW would welcome greater clarity on funding and how collaborations would be supported.

Councils agree that school improvement teams should work more closely to share resources that support schools to provide the best learning outcomes. Subsequently, there will need to be robust quality assurance processes in identifying the best practice. Identification of best practice is Estyn's role. It is important that regulators are brought into the review of the journey of change in this area as schools are working in a significant period of change with significantly reduced capacity for support around them. It is therefore also important that Estyn and other regulators are cognisant of this context for schools, local authorities and regions as the system undergoes this change.

Educational outcomes of learners and gaps in attainment between groups of pupils.

In March 2025, the WLGA and ADEW submitted a joint response to Welsh Government's consultation '*Data and information to support learning and improvement: for those working within the school system*'. Some of the key themes on attainment and learner outcomes within this response are relevant to the areas of focus within this inquiry. The key themes are summarised overleaf and our full response can be found [here](#).

Data and information proposals to support learning and improvement

- The removal of high-stakes indicators is welcome and should allow schools to focus on the progress and outcomes of individual learners. To ensure the principles remain effective, there must be a shared commitment across all levels of the system to use data transparently and constructively, rather than in a way that encourages defensive or performative practices. To this end, much will depend on how Estyn interpret and use school-level data when forming judgements.
- Councils overall are supportive of using contextualised data to inform school improvement, providing there is sufficient guidance and training on how schools should be applying this consistently.
- Councils however did report that there are gaps and uncertainties relating to the understanding of learner progress which risks undermining some of the Curriculum for Wales (CfW) aims and the new information ecosystem principles.
- Furthermore, councils and senior leaders within schools have also shared concerns over the complexity of the draft proposals on 'Data and information to support learning and improvement', noting that there is a risk of information overload for a number of different stakeholders. This could lead to confusion within the sector, particularly amongst parents. The vast quantity and complexity of the information being described will make it difficult for parents and carers to draw sensible conclusions from all the reported data.
- Council education officers would also welcome further clarification on the Learner Entitlement Indicator Framework to support school improvement and Learner Attainment. Specifically, calling for more information and further development in areas of accountability, intervention strategies, workload impact, post-16 support, equity, and parental engagement.
- Councils have also cited the lack of clear mechanisms for raising expectations and benchmarking against high performing systems as a challenge in supporting continuous improvement.
- The data functionality for schools and local authorities needs to be improved, developing user friendly and interactive data tools with advanced filtering capabilities would help. Aligning datasets with existing local authority tools



would avoid duplication and ensure that schools can easily analyse their own performance.

Gaps in attainment between groups of pupils

- The system in Wales must recognise the progress that each learner makes whilst having high expectations of their attainment targets. Schools must have a very clear view of individual learner strengths and areas for improvement for them to plan to support educational progress. This will ensure the provision supports improved progress of both groups and individuals which in turn reduces attainment gaps.
- Under the draft proposals on data and information, councils have also reported that excluding outcome data for pupil groups smaller than 50 could be problematic. This risks overlooking important patterns in subjects with a smaller uptake and smaller schools. It could also affect smaller groups of Welsh medium learners or smaller dual language groups of learners.

Factors impacting on educational progress such as pupil absence, deprivation, funding and workforce capacity.

Pupil absence

- Attendance, behaviour and educational reforms (including ALN and Curriculum reform) have been identified as the main challenges and areas in need of focus, and this is against the backdrop of financial deficits.
- Poorer attendance including high exclusion rates, have a detrimental impact on learner progress. Schools, settings and education officers invest a significant amount of time and resource into raising attendance rates, but it takes time for this to translate into improved learner outcomes and progress.
- Several societal and cultural changes have had a negative impact on attendance, which has been exacerbated by the pandemic. This will need tackling at the community level as well as needing a school-focused approach to raise attendance rates and improve pupil outcomes.
- The education system alone cannot solve some of the new societal norms and unhelpful parental expectations, for example, transport thresholds that have existed for decades are now being used as a false 'barrier' to attendance, with some parents expecting pupils should be picked up from the door, or that pupils cannot walk to school in the rain.



- There is also a general concern over increasing Elective Home Educated (EHE) pupils and for pupils receiving Education other than at school (EOTAS).
- Councils would welcome a parent, carer and community campaign in partnership with schools and settings, to promote the importance of school attendance. There is also a new need to clarify parental roles and responsibilities in getting pupils to school and school ready.
- Likewise, a campaign on the safe and effective use of social media to minimise this distraction in and outside of school could support attendance and better engagement during school hours.
- Pupils who have higher levels of absence are more likely to exhibit poorer levels of engagement when in school. Investing in strategies to promote positive behaviours is therefore essential in improving attendance, learner outcomes and attainment.
- Generally, many report that behaviour has changed in our schools with greater levels of defiance and aggression at times. However, this shouldn't be conflated with rarer examples of 'violence' in schools. There is room for improvement in terms of learning best practice, be that more staff training on trauma informed approaches or training on adapting the curriculum to best meet pupil needs.

Deprivation

- Pupil deprivation undoubtedly still poses a significant barrier to learning and increases learner vulnerability. Learners from lower socio-economic backgrounds are more likely to have fewer experiences that prepare them for school, impacting their early developmental progress. It is therefore critical that additional resources are put in place at all stages, in addition to the curriculum offer, to help overcome these disadvantages.
- One of the unintended consequences of the successful roll out of Universal Free School Meals provision is the distortion of deprivation data and eFSM as a reliable proxy for measuring child poverty. Not all families in need support are registering for grants or benefits which makes it more difficult to accurately target support.

Funding and workforce capacity

- The funding challenges facing both councils and schools are having an impact on workforce capacity at all levels of the education sector which in turn will impact educational progress. Efficiency savings have been made over several years which impacts delivery and restricts a local authority and school's ability to plan long term investments. Local authorities are experiencing significantly diminishing resources when demand for services / interventions are higher than ever and this continues to be an increasing challenge.



- Increasing budget cuts are leading to a rise in deficit budgets and redundancies in schools. This creates increased pressures on local authority teams to manage these effectively and deliver on their statutory responsibilities.
- The following list isn't exhaustive, but it provides some additional context on the funding pressures that councils are currently experiencing:
 - salary uplifts/ school workforce pay and pension pressures,
 - breadth of statutory services, including an increase in the complexity and volume of safeguarding responsibilities,
 - home to school transport funding,
 - ALN funding pressures including out of county costs,
 - increase in complex health needs which should be dealt with by the Health sector as opposed to education and school teams,
 - small school funding pressures,
 - behaviour costs including the cost of permanent exclusions and alternative placement costs,
 - pressures associated with implementing new educational reforms including unfamiliar qualifications and increased non-examination assessment requirements on school staff,
 - inflationary costs for example on school catering and resources.
- The sustainability and timing of funding (revenue, capital and grant funding) is also a challenge, and councils would welcome three-year funding agreements to support longer term planning.
- WLGA and ADEW agree that there is insufficient funding to support all the new school improvement aims and that without additional funding it is difficult to build enough capacity in the system to plan and deliver new models for successful school improvement.
- Whilst the general outcomes of the Middle Tier Review are welcomed with funding coming to local authorities, there is an emerging risk that the salary ranges of School Improvement Advisers are far in excess of local authority salary ranges. As TUPE will apply in most cases, this will pose significant financial pressures for local authorities who would have to absorb some of these staff and would put their own pay structures under pressure with reducing budgets to cover.
- Furthermore, another financial challenge is that Headteacher salary ranges are far ahead of everyone else in the system (excluding consultants). This makes it difficult for local authorities to be able to afford to 'second' staff into the system from schools due to the disparity in terms and conditions as well as pay.
- Staff workload at all levels of the education system also needs protection. If we add work, then we need to carefully think about what we can remove. New

initiatives or additional responsibilities that staff are expected to deliver must be fully funded.

- The WLGA and ADEW are also aware of an unhelpful narrative emerging around local authorities not delegating as much funding as possible to schools. ADEW feels strongly that as much funding as possible is passed on to schools directly and local authorities are also currently having to work under capacity. It would be useful to develop clear and consistent messaging around this with key partners and to help all stakeholders understand the funding arrangements, for example the additional investment local authorities provide on top of Welsh Government education funding.

Strengthening school improvement and learner attainment will require more strategic direction from Welsh Government and cross-sector working and policy which does not contradict key priority areas. The education infrastructure needs to be maintained and strengthened so that lack of funding does not reduce the number of leaders, teachers and support staff in schools that can deliver high quality teaching and learning. Likewise capacity needs to be built to strengthen the support that councils can give in working towards these fundamental national priorities.