

REVIEW OF PUBLIC ADMINISTRATION COMMENTS BY THE SOUTHERN EDUCATION AND LIBRARY BOARD ON POLICY PAPERS 1-18

Introduction

The Board welcomes the opportunity to comment on the eighteen papers issued to it as an education stakeholder.

This Response has been approved by the Chairpersons' Committee on 17 January 2007 and will be considered by the Board on 14 February 2007 following which any additional issues will be sent to the RPA Team.

This paper is informed by the comments of Governors, Principals, teachers and Board staff who responded to the papers at eight meetings.

The comments from the attendees at six meetings are attached at Appendix 1.

Recurring communication issues raised at the start of the meetings were: the failure by the RPA team to engage Governors and Principals in the process at an earlier stage; the absence of engagement between the Team and schools since the Secretary of State's announcement of November 2005; and apprehension that if comments on the proposals were not made now there would be little opportunity during the formal consultation period on the draft legislation when the legal language in which the proposals would be couched would be an impediment to their understanding by schools.

It was regretted that examples to illustrate the outworkings of policy decisions directly affecting schools had not been provided as they would have clarified the implications for schools and reduced speculation.

Format of this Response

Comment is made on the themes contained within Papers 1, 2, 4, 5, 7 and 13 which particularly relate to schools. The opinions take account of the feedback from schools.

Views are expressed on the Schools' Library Service based on the advice from Library interests on the Board.

Observations are made on papers 6, 9, 12, 15 and 17.

The Chairpersons' Committee wished the greatest emphasis to be placed on these twelve papers but recognised the relevance of the remaining papers although they chose not to comment on them.

The Committee will comment on papers 19 and 20 when these are issued.

Theme 1 : The focus of the RPA on school improvement

There is universal approval for the change of focus from streamlining educational administration with envisaged related redirection of resources to frontline services in schools and the Youth Service.

While accepting the need for continuing assessment of standards and action to enhance them the papers, especially paper 13, would carry more conviction if:

- justification of pejorative statements such as “a degree of complacency”, “masks a degree of under-performance” and “coasting” schools was demonstrated; and
- the “Vision for Education” as stated in paper 2 recognised the developmental purpose of education and described it as a life-long process. The purpose of the curriculum as stated in the Education and Libraries Order 1989 has strength and inspires motivation in contrast to the pallid statement in this paper. It “promotes the spiritual, moral, cultural, intellectual and physical development of pupils at the school and thereby of society; and prepares such pupils for the opportunities, responsibilities and experiences of adult life.”

Given the need to address these critical comments improving learning is the accepted driver of change.

“Value added” is the true indicator of progress but this concept has not been developed. Until this vital aspect of education is described and the means of transmitting it within the school environment explained schools will not be aware of how it benefits the learning and experiences of pupils.

Performance Indicators need to be developed to encourage schools to achieve “value added”. Positive support will convince schools of their abilities to deliver better performance while castigating them will demoralise.

Theme 2 : Maximised supported autonomy

Board Members are positive about the relationships between two concepts: improved learning opportunities for children and young people and greater decision-making by schools. Those attending the meetings were generally unconvinced.

The merits of the Governors appointing teaching and non-teaching staff, developing opportunities to have choice in the delivery of support services, the rationale of efficient and economic outcomes from collaborative procurement with schools in ‘hard’ or ‘soft’ confederations strengthening one another, responding to community rather than sectoral needs, releasing energies given to administrative tasks to concentrate on curricular purposes were portrayed but were generally

rejected on grounds of Governors' reluctance, possibly refusal, to undertake more accountable roles while continuing to serve in a voluntary capacity.

Principals were not convinced that their administrative tasks would reduce, that they had the capability to meet the envisaged demands without significant capacity-building and a high level of continuing external support which they wished to access easily without the formalities of service level agreements.

The thesis of greater autonomy failed to convince because of the reiteration of the proposal without clear answers to fundamental aspects such as: whether there would be levels or a continuum of degrees of autonomy; clear criteria for movement; whether all schools would initially have the same extent of autonomy; and how schools in differing autonomy situations could group together for curricular or administrative purposes. The benefits envisaged in 'A Shared Future' might be jeopardised as well as equality of provision for all young people.

Small schools were judged to be incapable of deriving benefits. Indeed, the proposition of increased autonomy was thought to contribute to widespread closure with resulting schools requiring significant enrolments and certainly non-teaching principals.

Recognising assurances about levels of funding in future years could not be given many school representatives could not speculate about benefits in school improvement or operational terms. The most critical saw a risk of reduced spending on education to meet savings postulated by consultants and feared that a greater workload at school level would result from less ESA provision of services and a move to procurement.

In its comments the Board is obliged to balance the potential benefits of maximised supported autonomy which it can envisage with the concerns of schools.

The Board also recognises that the legislation must meet an evolving situation with the number and nature of support services being changed in line with Government policy of decentralisation.

The policy papers fail to explore the implications of greater autonomy for schools in areas such as Home to School Transport, Catering, Legal, Audit, Special Education, the Schools' Library Service, Maintenance and Procurement.

Some of these services are subject to adherence to EU and British laws. It is the Board's view that any legal matter constraints on transfer of responsibility to schools should be explored and explained to give the fullest possible picture to schools.

The Board envisages practical, operational and financial difficulties for the ESA if it has to maintain quality services to provide to schools and has to tender for the same services so that schools can have choice. The variability of uptake, the financial pressures to retain staff in ESA services which may not be availed of reminds the Board of the unsuccessful Compulsory Competitive Tendering period which Government came to recognise as a failed idea.

It would be regrettable and divisive if an outcome of delegated autonomy and the creation of support services resulted in sectoral provision with some of the sectoral bodies creating support services focused on schools in their sectors.

Theme 3 : Governance

At the meetings school representatives explored the consequences for the recruitment and retention of Governors and the potential strains upon the relationships between Principals and Governors in particular.

Comment can only properly be made if draft schemes of management for Boards of Governors and the draft Financial Memorandum and Management Statement for the ESA issue to show commentaries of relative responsibilities. Their absence feeds unhelpful speculation.

Governors in the controlled sector regretted the apparent ending of transferor representation on Boards of Governors of secondary intermediate schools. The Board urges the Department to find a way of maintaining this representation.

Theme 4 : Accountability

While accepting the inter-connection between governance and accountability the Board wishes to highlight proposals which appear to cause ambiguity of responsibility:-

If schools obtain services from organisations other than the ESA the latter will find it difficult to account for the quality and value of many of these services; that assessment would in the first instance rest with schools.

Given the obligations which will remain on the ESA to comply with accounting requirements and to be accountable to DE there will be a tension between the level and nature of financial autonomy given to schools and the ESA's capacity to be accountable.

It is interesting that in Paper 7 Annex B the ESA would check appointments procedures. Given the substantial responsibilities that would be vested in Boards of Governors as 'employers' this proposition suggests reservations about Governors' ability to manage an operational activity.

The Board agrees with the proposition in paragraph 10 of the paper that the functions of 'employing authority' and 'employer' should be vested initially in the ESA and 'employer' functions be subsequently delegated to Boards of Governors.

Further clarification is needed on the practical aspects of duties undertaken by the Department of Education in its policy-making and monitoring functions and the responsibilities of the ESA as described in the papers which refer to these functions.

While school representatives welcomed the assurance that employment complaints could cite both the Board of Governors and the ESA this offers a high degree of protection to Governors and might warrant limitation.

Managing accountability at school level will lose economies of scale and was a recurring concern of Principals and Governors.

Theme 5 : Ethos

School personnel and the Board are dissatisfied with the definitions of 'ethos' contained in Annex A of Paper 2 particularly as it is developed in terms of its dimensions / components and believe that there are more unifying and consistent features which parents assess when making choices of schools.

Ethos reflects the values, vision and mission which are responsive to the needs and wishes of the local community. It is reinforced by the Governors and, like the vision for education, must encompass moral and spiritual values.

Theme 6 : Education Advisory Forum

The Board recognises that the concepts in this Paper are evolving.

Nevertheless the description of the composition and operation of the Forum leaves Governors, Principals and Board Members disappointed. At its worst it is seen as a creature of the Department with its Chair appointed by the Minister and the Department providing the secretariat.

At best it has been described as 'a talking shop'. It is assumed that it constitutes part of the frameworks of checks and balances. The EAF as described does not inspire confidence that it can adequately reflect views or influence decision-making. It is the Board's hope that more detailed information reflecting further thought will address the weaknesses as currently perceived.

Theme 7 : Buildings

These comments apply to the schools' estate and to youth provision.

The Board supports area planning policy and the involvement of local communities in the planning process for the initial stage of assessment of need.

It looks forward to the issue of Paper 20. The relationship with the findings in "Schools for the Future" gives rise to speculation. This report would need to be teased out in this paper to assist consideration of the proposals.

Concerns described in paragraph 3.6.1 are, the Board believes, highly speculative. There is no evidence that during the lifetime of the Boards their maintenance

programmes have favoured controlled schools. Strategies planning responsibilities for a whole estate is also not seen as giving rise to concerns.

The Board suggests there are particular aspects of the proposal in respect of non-controlled schools which may need development to satisfy the ESA's accountability requirements and meet the concerns of Trustees.

Theme 8 : Future of the Schools' Library Service

The SELB welcomes the publication of Paper 8 - Future of the Schools Library Service and the recognition of the importance of school libraries contained within it. However, the Board wishes its comments to be noted and taken into account on the following aspects of the paper.

Background

The Board is disappointed that the role of the School Library Service (SLS) is defined in a rather narrow way which focuses on only some aspects of the service's work. It is the view that the SLS works in partnership with schools, CASS and the Department of Education to provide advice, training, support and resources which will:

- Facilitate continuing improvement and the raising of standards in schools;
- Encourage the development of information literacy to enable children to become effective independent learners for life; and
- Inspire and encourage young people to read for pleasure.

The Board wishes the role of the service in working together with schools, CASS and other relevant bodies to contribute to improved literacy and information skills to be emphasised.

The Importance of School Libraries

The SELB is pleased to see acknowledgement of the "significant contribution to ...raising standards" and the acknowledgement that the provision of a good school library assists equality of education for pupils irrespective of their pupil background.

It is pleasing to see the emphasis on school development plans which call for alignment of the school library with strategies for literacy, numeracy, and ICT and believe that such integrated thinking will not only maximise use of resources but will also support wider learning. This may take place away from traditional centres such as the classroom and the library or resource centre and be made possible by current developments in ICT which facilitate varied access to information and learning materials.

Policy requirement

The SELB is concerned that the paper makes no mention of the SLS being a statutory service as is currently the case. The SELB believes that the service should continue to be statutory and centrally funded because:

- Centrally funded school library services ensure that ALL schools have access to specialist advice and to materials which support the curriculum.
- Research carried out by the inspectorate in England showed that centralised services provide much better value for money than can be achieved if money is spent by individual schools. This research suggested that schools receive £9 of value for every £1 spent centrally.
- Experience in England has shown that where the funding for school library services is put into delegated budgets, school library services have to focus on marketing and selling services to the detriment of time that can be spent more profitably on service delivery; also, greater variations develop in quality of provision in schools. In some instances this approach also creates problems with the relationship between public libraries and schools as public libraries are not funded to pick up deficiencies caused by lack of provision to support the curriculum in schools.

Existing Arrangements

Policy direction for SLS will transfer to the ESA.

Way forward

Staff will need reassurance regarding their status leading up to and following the move to the ESA or the Library Authority.

The SELB considers that it is appropriate and essential that the ESA has responsibility for the SLS but suggests that staff involved should be the employees of the Single Library Authority. The development of a Service Level Agreement between the ESA and the Single Library Authority is seen as the obvious and best way forward. The SELB SLS would welcome stronger links with CASS and generally agrees with the advantages as described in the paper. Both of the disadvantages listed are seen as easily surmountable.

View of stakeholders

It was reassuring that the matter of the SLS remaining a statutory service was confirmed at the 8 December 2006 meeting between the Chief Librarians and DE officials. The intention to consult widely and to talk directly to professionals in the field in devising the future policy for the delivery of the schools library service is welcomed.

Legislative Powers Required

We note that:

Paper 1 'The RPA in Education: an overview' states that 'The education support and ancillary services needed by schools will be provided by ESA in a coherent, consistent and cost effective manner and to a high standard.'

Paper 2 'The Relationship between the ESA and Schools' states in relation to professional and administrative support services that 'The ESA will provide a range of support services for schools including: administrative support in areas such as human resource management and financial management; and professional services such as curriculum support, training and professional development.

Such services must provide value for money and be effective, efficient, high quality and responsive to the changing needs of schools.' We hope that the legislative arrangements made for the ESA in relation to the above paragraphs will, together with the legislation for the NI Library Authority, enable the provision and delivery of an efficient and effective SLS.

Theme 9 : Youth Work

The Board would have welcomed seeing the incorporation of 'youth' proposals as a theme throughout a number of papers rather than their isolation in one paper.

The collaborative arrangements for the delivery of support to the Youth Services in this Board and the Western Education and Library Board justifies a common response.

The Board welcomes the broad thrust of this paper, particularly:

- The recognition of the benefits that youth work brings to young people and to society as a whole;
- The focus on the needs of young people;
- The commitment to partnership working between the statutory and voluntary sectors;
- The commitment to an ethos of inclusion and participation; and
- The role that the ESA will play as both a deliverer and commissioner of youth services.

The Board believes that the Youth Service is an integral part of education and that primary legislation and associated policies should reflect this. It is therefore disappointing to note the lack of referencing to the Youth Service, throughout the policy papers, particularly in respect of:

- Governance and accountability;
- Financial arrangements;
- Planning at a local and regional level;
- The advice function;

- Human resources; and
- Estates.

Paper 9 does not specify the age range for youth services. It is essential that there should be clarity on this point.

It is also important that there should be adequate support for capacity building within the voluntary sector and clarity about how this will be provided.

The planning process will be key to the delivery of successful youth work on an equitable basis across Northern Ireland. The paper makes it clear that the Education and Skills Authority will be required to prepare and publish a youth services plan at a regional level. It will be equally important for the ESA to engage with stakeholders at a local level and to ensure that local services meet local needs whilst ensuring a high level of consistency. To achieve this the ESA should have responsibility for both regional and local planning, taking account of community planning in this process.

The Board wishes to highlight the need for adequate funding for the transitional process and to establish the Northern Ireland Network for Youth.

Theme 10 : Proposals concerning a range of issues

Paper 12 : ESA – Director of Children’s Services

This proposal needs development. It shows signs of having been directly imported from the very different structure of local Government in England.

Essentially the paper seems to describe the role of a Director of Children’s Services in the ESA given, as set out in paragraphs 15 and 16, the different context.

At best the appointment is seen as one of drawing public attention to children’s services issues and contributing to ‘joined up’ thinking with counterparts in HSSA.

The Board acknowledges the value of the post if the range of significant work described in paragraph 22 is undertaken but would not wish the emphasis on child protection to detract from the significance of other services.

Paper 15 : Home to School Transport

The Board is clearly aware as one of the main providers and funders of home to school transport of rising costs.

Members recall that charging for school transport has been offered by DE over a number of years as a factor in reducing costs.

The difficulties which have prevented this change will not be removed solely because of a legislative change.

The implications for rural communities will be massive; the Board believes for that and for other reasons there will be equality implications.

Before enshrining the proposals in legislation the Department would be well advised to undertake an Equality Impact Assessment.

The Board wishes to draw attention to the counter effects a change of policy will have on the amalgamation of schools as part of "Schools for the Future"; innovative proposals for federations of schools, current programmes for extended schools and the designation of specialist schools.

The Board believes a "joined up" approach is needed to include other public service providers of transport. It regrets the ignoring of recommendations in the Best Value Review of Transport.

Paper 17 : Age Appropriate Provision for Pre-School Children

The Board understands the reasons for these proposed changes and believes they are in the best interests of very young children.

At the same time it is mindful of practical difficulties for parents and schools.

While pre-school provision in the form of playgroups is extending there are areas where the ability of a nursery school or a primary school with a nursery class to take young children is valued by parents.

There are over 280 two year old children in nursery classes in this area. While the number is declining as the Department approves a move from the mixed pattern of attendance to full-time places this change has still to be approved in a number of cases. Schools with these young children will find it difficult to adapt to their exclusion in the space of a year.

The ending of reception classes and groups will have different implications, depending on whether the schools are in urban or rural areas.

The majority of these children who number over 300 are in small rural schools which will suffer from the ending of funding. This will bring financial difficulties as well as reducing parental support and possibly confidence also. Rural proofing is required as well as recognition that a consequence will be that some children may not have access to early year education but will remain a year longer with child minders.

Theme 11 : Special Education

Possibly the greatest omission is in respect of special education both in terms of the impact of greater supported autonomy for schools with children with special education needs and the absence of proposals for the continuing service the Board currently gives to an in conjunction with parents and other professionals.

Theme 12 : Competition for Pupils

While there is as yet no resolution of admission arrangements to post-primary schools a welcome would have been given to proposals around sustainability and funding which would reduce the present competition among schools for pupils.

Conclusion

The Board's comments are not to be regarded as negative. Criticism has been expressed with the intention of invoking from the Department further thought and development of conclusions.

The Board invited school representatives to act as 'critical friends' of the proposals and assumed this role itself.