

Appendix A

Section 1

CONSULTATION REPONSES - Wider Stakeholder Consultation

1.1 Introduction

The wider stakeholder consultation commenced on 28 March 2018 and concluded on 11 May 2018. Translated consultation documents were provided in the top 11 languages with the greatest interpreting and translating need. The consultation information was included in the Swansea Schools Newsletter for dissemination to school staff and parents/carers on a weekly basis. Information was sent to individuals and organisations from/with links to minority ethnic communities. Two face-to-face drop-in meetings were organised for parents/carers with interpreters made available on 23 April 2018 in Bishop Gore School and on 8 May 2018 in Bishop Vaughan School. The proposals were discussed in the pupil voice forum of 9 May 2018 where pupils and the school staff accompanying them were able to participate. In addition, the proposals were presented and discussed in the cross-phase head teachers' meeting on 10 May 2018.

A separate EMAU staff and Trade Union consultation ran concurrently to the wider stakeholder consultation. The staff consultation commenced on 16 April 2018 and ended on 16 May 2018, in line with the legal requirement of a 30-day consultation. Details of this consultation are found in Section 2

There were a large number of respondents to the wider stakeholder consultation including pupils, parents/carers, head teachers, school staff, EMAU staff, Unions and other stakeholders. The numbers are summarised below.

| | No. of individuals represented | No. of Written Comments/ Responses |
|--|--------------------------------|------------------------------------|
| Online Questionnaire (includes a range of stakeholders) | 280 | 102 |
| Pupils | 16 | 16 |
| Pupil Voice Forum | 38 | 1 (Evaluation Report) |
| School Staff | 24 | 24 |
| Parents/Carers | 146 | 146 |
| Head teachers | 4 | 4 |
| Head teacher Meeting | 67 | 1 (Record of Comments) |
| Chinese Association in Wales - Collective Response | 87 | 2 |
| EYST (Ethnic Youth Support Team) | 1 | 1 |
| Poverty and Prevention Officers | 2 | 2 |
| TOTAL | 665 | 299 |

Further details on number of respondents from different groups and methods of responding are given in the sections below. The number of respondents giving similar comments in each group have been given as a percentage in order to compare across groups and identify key themes.

The majority of respondents were against the proposal. This can be seen through the figures from the online questionnaire and from the comments below. Comments were often strong but were also conflicting in some cases.

424 respondents completed the questionnaire either online or on paper although some respondents did not answer both questions. The responses to both the paper and online questionnaire are amalgamated below:

| | I agree with the proposal | I disagree with the proposal | I neither agree nor disagree with this proposal | Total |
|---|---------------------------|------------------------------|---|-------|
| Devolve available, additional Welsh Government funding to schools, for minority ethnic learners, via a formula | 34 (8%) | 376 (88.7%) | 14 (3.3%) | 424 |
| Move to a model of a small central advisory service that supports all schools to ensure that minority ethnic learners are included and achieve to their potential | 27 (6.5%) | 373 (90.6%) | 12 (2.9%) | 412 |

1.2 Online Survey Responses

There were a total of 280 respondents to the online questionnaire. This figure includes 56 children and young people (CYP). 102 respondents added additional comments. This included 23 from CYP. The 'About You' questions from the online survey demonstrate that a wide cross-section of people from different ethnic backgrounds responded to the main questionnaire. A range of religious backgrounds were represented as were refugees/asylum seekers.

The majority of the online survey respondents disagree with the two elements of the proposal (see tables below).

Responses to Online Questionnaire

| | I agree with the proposal | I disagree with the proposal | I neither agree nor disagree with this proposal |
|---|---------------------------|------------------------------|---|
| Devolve available, additional Welsh Government funding to schools, for minority ethnic learners, via a formula. | 27 (12.1%) | 187 (83.5%) | 10 (4.5%) |
| Move to a model of a small central advisory service that supports all schools to ensure that minority ethnic learners are included and achieve to their potential | 21 (9.6%) | 188 (85.8%) | 10 (4.6%) |

CYP Online Questionnaire Responses

| | I agree with the proposal | I disagree with the proposal | I neither agree nor disagree with this proposal |
|--|---------------------------|------------------------------|---|
| Give the money to schools so that they can provide the support needed by learners | 3 (5.4%) | 53 (94.6%) | 0 (0.0%) |
| Have a very small team in the Council that support schools to ensure that minority ethnic learners are included and achieve the best they possibly can | 1 (1.8%) | 54 (96.4%) | 1 (1.8%) |

Online Questionnaire - About You

Are you...?

62 (29.2%) Male
140 (66.0%) Female

10 (4.7%) Prefer not to say

Is your gender the same as that which you were assigned at birth?

197 (94.7%) Yes
0 (0.0%) No
11 (5.3%) Prefer not to say

How old are you ...

| | | | |
|------------|----------|-----------|-------------------|
| 2 (0.9%) | Under 16 | 13 (5.9%) | 56 - 65 |
| 9 (4.1%) | 16 - 25 | 8 (3.7%) | 66 - 75 |
| 56 (25.6%) | 26 - 35 | 1 (0.5%) | 76 - 85 |
| 69 (31.5%) | 36 - 45 | 0 (0.0%) | Over 85 |
| 52 (23.7%) | 46 - 55 | 9 (4.1%) | Prefer not to say |

Would you describe yourself as...

Please mark all that apply

| | | | |
|---------------------|----------|-----------|---|
| 114 (57.9%) | British | 4 (2.0%) | Other British (please write in at end) |
| 68 (34.5%) | Welsh | 13 (6.6%) | Non British (please write in at end) |
| 8 (4.1%) | English | 0 (0.0%) | Gypsy/traveller |
| 1 (0.5%) | Irish | 7 (3.6%) | Refugee/Asylum Seeker (please write in current/last nationality at end) |
| 0 (0.0%) | Scottish | 4 (2.0%) | Prefer not to say |
| Write in here 25 | | | |

To what 'ethnic' group do you consider

| | | | |
|-------------|---|-----------|---|
| 140 (68.0%) | White - British | 11 (5.3%) | Asian or Asian British - Bangladeshi |
| 13 (6.3%) | Any other White background (please write in at end) | 4 (1.9%) | Any other Asian background (please write in at end) |
| 2 (1.0%) | Mixed - White & Black Caribbean | 4 (1.9%) | Black or Black British - Caribbean |
| 1 (0.5%) | Mixed - White & Black African | 1 (0.5%) | Black or Black British - African |
| 2 (1.0%) | Mixed - White & Asian | 0 (0.0%) | Any other Black background (please write in at end) |
| 1 (0.5%) | Any other Mixed background (please write in at end) | 11 (5.3%) | Arab |
| 5 (2.4%) | Asian or Asian British - Indian | 4 (1.9%) | Other ethnic group (please write in at end) |
| 4 (1.9%) | Asian or Asian British - Pakistani | 3 (1.5%) | Prefer not to say |

What is your religion, even if you are not currently practicing?

Please mark one box or write in

| | | | |
|--|--|------------|-------------------|
| 65 (30.4%) | No religion | 32 (15.0%) | Muslim |
| 103 (48.1%) | Christian (including Church of England, Catholic, Protestant, and all other Christian denominations) | 2 (0.9%) | Sikh |
| 2 (0.9%) | Buddhist | 2 (0.9%) | Other |
| 4 (1.9%) | Hindu | 4 (1.9%) | Prefer not to say |
| 0 (0.0%) | Jewish | | |
| Any other religion or philosophical belief (please write in) | | | |
| 2 | | | |

What is your sexual orientation

| | | | |
|-----------------|--------------|------------|-------------------|
| 5 (2.4%) | Bisexual | 30 (14.6%) | Prefer not to say |
| 3 (1.5%) | Gay/ Lesbian | 1 (0.5%) | Other |
| 166 (81.0%) | Heterosexual | | |
| Please write in | | | |
| 4 | | | |

Can you understand, speak, read or write Welsh?

Please mark all that apply

| | | | |
|------------|-------------------------|-------------|-------------------|
| 37 (17.8%) | Understand spoken Welsh | 38 (18.3%) | Learning Welsh |
| 11 (5.3%) | Speak Welsh | 116 (55.8%) | None of these |
| 9 (4.3%) | Read Welsh | 14 (6.7%) | Prefer not to say |
| 7 (3.4%) | Write Welsh | | |

Which languages do you use from day to day?

Please mark all that apply

| | |
|-----------------|-------------------|
| 179(93.7%) | English |
| 16 (8.4%) | Welsh |
| 15 (7.9%) | Other (write in) |
| 6 (3.1%) | Prefer not to say |
| Please write in | |
| 43 | |

Do you have any long-standing illness, disability or infirmity?

By long-standing we mean anything that has troubled you over a period of time or that is likely to affect you over time.

This could also be defined Under the Disability Discrimination Act 1995 as: "Having a physical or mental impairment which has a substantial and long term adverse effect on your ability to carry out normal day to day activities."

| | |
|-------------|-------------------|
| 11 (5.3%) | Yes |
| 187 (90.3%) | No |
| 9 (4.3%) | Prefer not to say |

Does this illness or disability limit your activities in any way?

| | |
|-------------|-------------------|
| 12 (6.7%) | Yes |
| 159 (88.8%) | No |
| 8 (4.5%) | Prefer not to say |

Summary of Key Comments from Online Questionnaire

The table below summarises the key comments from the 79 written responses received via the online questionnaire from stakeholders other than pupils, who are shown below. Whilst comments were anonymous indications are that the responses include those from head teachers, school staff, EMAU staff, parents and other stakeholders. The online questionnaire comments are representative of the range of comments from the consultations.

| Key Comments | % of respondents (to nearest %) |
|--|---------------------------------|
| Specialist EMAU support is essential/invaluable/should stay as it is/should not be cut | 49% |
| Negative impact on learning/standards/achievement/ attainment/progression of EAL learners | 30% |
| Schools/class teachers - will struggle to meet the needs of all pupils/haven't got time to give individual attention to EAL learners/time for non-EAL learners will be diluted | 20% |
| Bilingual/TA support is needed: to support pupils and families to settle/to support beginners in the classroom/to value home languages | 15% |
| 3 staff cannot deliver the services required | 13% |
| There is a need for interpreting services/home-school links for parents | 11% |
| EAL learners will not have equal access to the curriculum/not have individual needs addressed | 10% |

Other Comments (less than 10%):

| |
|--|
| There will be an impact on all pupils |
| Funding should be allocated purely on EAL numbers with no formula |
| Proposals are not in accordance with City of Sanctuary/UNCRC/are discriminatory/unfair |
| There should be a few advisory teachers and BTAs |
| Do not teach Welsh, it is a waste of time/money just teach English |
| Schools should be credited with funding for EAL learners who arrive in school after PLASC |
| £500 should not be given to all schools |
| 3 members of staff retained centrally is disproportionate – it should be 1 |
| Schools do not need capacity building |
| Leaders of schools are responsible for their learners and monitor standards/scrutinise provision |
| Schools do not need support to evaluate and action plan |

| |
|--|
| Nursery and reception should be included in the funding (lack of English language role models in some schools) |
| Schools are not reliant on EMAU |
| Funding should remain centrally and not be devolved |
| Schools are not ready to meet the needs of EAL learners/take charge of funding |
| There needs to be a longer transition period |
| Questioning the costs ? |
| Keep a central service of BTAs only |
| Funds devolved to schools need to be monitored for impact |
| Strategic lead for EAL with retention of bilingual support/interpreting services |
| Experienced schools can capacity build in schools with small EAL numbers |
| More teachers needed in the advisory team |
| The Council and schools should fund the service |

| |
|---|
| EAL learners will not be able to access the curriculum |
| Children need to be taught English |
| Achievement of EAL learners will be impacted on |
| Removing the specialist teachers will make learning difficult |
| More support is needed/ money should go to schools so that pupils have support more than once a week/ once a week is not enough |
| Could work with communities as a whole to support parents with understanding of the school systems |
| Could university students/parents volunteer? |

1.4 School Staff Responses

24 school staff (class teachers/teaching assistants) responses were received via post (21), via face-to-face discussions at the parental meeting held in Bishop Vaughan (3).

| Comments | % of respondents (to nearest %) |
|---|---------------------------------|
| The additional support is needed | 50% |
| BTA support is very important | 46% |
| Negative impact on inclusion/integration/access to the curriculum/self-esteem/wellbeing | 38% |
| The need for interpreting and translating | 29% |
| Workload of teachers/difficult to give time to all pupils in the class without additional support | 21% |
| Schools need own funding for EAL learners (not minority ethnic) to employ own staff | 21% |
| Negative impact on the attainment of all pupils | 17% |
| Negative impact on links with families/inclusion of parents | 12% |

Other Comments - less than 10%

| |
|---|
| Impact on achievement/attainment of EAL learners |
| More funding should be found/it should be moved away from other initiatives |
| Loss of highly skilled staff/expertise |
| Need access to GCSEs in their home language |
| Subject teachers do not have time to create the differentiated resources |
| Schools may not spend the money on minority ethnic learners |
| Team of 3 too small/extreme reduction/too quick |

1.5 Pupil Responses

39 pupil responses were received. This includes 2 face-to-face responses at the Bishop Vaughan parents/families meeting, 10 questionnaires completed at the pupil voice forum and 4 responses by post. 23 comments were received via the online questionnaire. The comments are summarised below:

1.3 Parents and Carers Responses

146 responses were received from parents/carers via email (2), post (120) and the two face-to-face meetings (24). 63 (43%) of the responses were in languages other than English/Welsh (10 languages) and were then translated into English.

| Key Comments | % of respondents (to nearest %) |
|--|---------------------------------|
| The service should continue/is essential/the support is needed | 31% |
| Bilingual support is needed/valued/makes a difference/helps access to the curriculum/helps integration | 27% |
| There is a need for interpreting and translating services | 21% |

Other Comments – less than 10%:

| |
|--|
| There should be more funding |
| Proposal will have a negative effect on children's education |
| Reduction of BTAs will have a negative impact on the numbers of minority ethnic staff role models in schools |
| Support is most important at the early stages of learning English/in the first few years |
| Children need to learn about their own language/culture |
| The service is important for home-school links – this could be lost |
| Increased workload on class teachers/pressure on schools/impact on whole school |
| Negative impact on wellbeing/emotional support/inclusion/isolation |
| Centralised service is better/ could provide some languages |
| Nursery and reception should be included in the formula for devolving |
| There is not a long enough transition period |
| School staff do not have the expertise in language – support needs to be via a specialist |

| Comments | % of respondents (to nearest %) |
|--|---------------------------------|
| BTA support/interpreting for pupils highly valued | 38% |
| The support for developing English/the specialist teachers for supporting learning highly valued | 23% |
| Parents need provision of interpreting services | 12% |

Other Comments – Less than 10%:

| |
|---|
| Importance of support at early stages of learning English |
| Negative impact on other pupils |
| The support/service should stay |
| The money should not go to every school |
| New arrivals need support to settle |
| Reduce the service slightly |
| Provide training for class teachers |
| Value the support for inclusion |
| Education needs more money |
| Ideas: support groups for parents/groups for children of the same language to meet up/resources on Hwb/apps for other languages |

Pupil Voice Forum

38 pupils from 10 primary and 6 secondary schools attended the Pupil Voice Forum. There were a number of EAL learners/speakers of languages other than English/Welsh present. A presentation was given to the pupils and staff, who were accompanying the pupils about the current model of EMAU support and the proposed changes. Learners were given the option to either partake in a discussion with teachers and council officers about the EMAU service and the current consultation or complete a practical task that looked at what support EAL learners need and who can provide the support.

Comments made by participants in the discussion, as detailed in the evaluation report of the forum included:

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|--|
| A pupil received support in reception and year 1 from a bilingual TA. The pupil commented "I would have still got there without the TA". |
| It was felt that more work would need to be done in schools where EMAU staff are based to support teachers to provide the support. |
| A member of staff felt that they can't provide the bilingual support; they can support pupils but not with the language barrier. |
| One pupil commented that his bilingual teaching assistant was really necessary and has helped him achieve an A grade at GCSE. |
| Families and school link (the role of the TAs) were concerns. |

| |
|--|
| The benefit from EMAU for non-English speakers is essential. |
| It was felt that it is also important to maintain the home language through group/peer support as well as through bilingual TAs. |
| Helping parents settle in with an initial meeting with schools. |
| Home language assessment is useful. |
| The language acquisition model A-D is crude for funding and needs to be moderated. |
| One pupil commented that different teachers helped with misunderstandings and that was helpful. |
| One suggestion was to give the money through an SLA depending on the level of EMAU support needed. |

Comments made by participants in the task, as detailed in the evaluation report of the forum include:

| |
|---|
| One young person said that they did not think it was fair to give all schools the same amount of money as some schools have more EAL learners than others. |
| One other pupil commented that the Government should spend less money on supporting conflicts and more money on supporting children and young people |
| One pupil said that they had moved to Swansea from Iraq and had relied on the EMAU support provided by his Arabic teaching assistant. |
| Participants felt that support needed would include <ul style="list-style-type: none"> • Translators • Interpreters • Someone to teach them the new language • Other people from the home country • Dictionaries x4 • Guidance • Language lessons to learn the new language • Friends x4 • Arabic Teaching Assistant • Therapist / counsellor • Moral support • Stay in touch with friends from homeland • Family support • Teacher to educate and teach child new things x4 • Cultural knowledge • Keeping traditions from home place • Information about the new place • Clubs to go to |

The Participants were asked:

What decisions should Swansea Council make about the EMAU service?

- Keep the service. Lots of people need the support. It is a vital service.
- Need support with culture and places
- Young people will feel isolated without support

- Could offer more languages for pupils to formally study

What does Swansea Council need to think about (in terms of the EMAU service)?

- Consider culture, not just place
- Think about the other factors, not just money
- Timetable the support so it's fair

Are there any other options that Swansea Council haven't thought of?

- Don't take the teachers away – just reduce their wages
- Do some fundraising
- Producing social groups of children of speakers of the same language across the county during school time
- Top-slice money from other pots

1.6 Head teacher Responses

67 head teachers were in attendance at the cross-phase head teacher's meeting on 10 May 2018 where a presentation was given. Head teachers had the opportunity to take part in a discussion and key comments were recorded. The consultation questionnaire was distributed prior to the discussion. There were no questionnaires returned. Key comments are summarised below:

| |
|---|
| What we need are bodies, under the new proposals the school will only get half of what the existing EMAU staff allocated to the school cost |
| We need someone to come in to teach the language |
| Minority ethnic children are being pushed to the back of the line and seen as an inconvenience |
| Head teachers do not need help with action planning |
| Bilingual support workers give the value not the teachers |
| Self-evaluation has been undertaken in schools for years we do not need someone attending the schools to show us how to do this |
| School to school support – CAs identify school-to-school support |
| Needs in this service continue to increase as the EMAU money has decreased |
| The current model does not work, how is the new model going to work? This needs to come at the source and be recognised |
| The model is not the best model to support the children, it needs to be targeted to the EAL learners |
| It is disproportionate to have two advisory teachers in the schools |
| The general feeling is for the model to be based on bilingual teaching and bilingual support |
| Formula - need to use actual numbers for EAL |
| There is a dis-incentive to allocate money on stages A-C, the formula purely needs to be with EAL numbers |
| Need to do more lobbying of Welsh Government |

| |
|--|
| The staff in the Unit will go elsewhere they are specialist staff and if going down this road we will be unable to re-employ staff |
| Would it have been helpful if several models had been put forward rather than just one model? |
| EMAU responsibility to move to schools from LA - thought it was already with schools |
| The statements made in the model are wrong |

Individual Head teacher Responses

Four primary head teachers submitted individual responses via email. Comments are consistent and generally concur with points from the head teacher meeting. Some head teacher comments were also evident from the online questionnaire and have been included within the summary of the online questionnaire responses. The comments below have not been percentaged due to the low numbers concerned. The comments detailed below were made in more than one of the responses:

| |
|--|
| The suggested devolved funding is inadequate |
| Schools with no EAL learners should not have £500 |
| Devolved funding should not be linked to stage of EAL but to EAL pupil numbers |
| Devolved funding should not be linked to stage of EAL but to EAL pupil numbers |
| Funding should be targeted at schools who most need it |
| Schools self-evaluate well and do not need support for this |
| Schools successfully support EAL learners themselves/class teachers are highly experienced and do not need training |
| The excellent outcomes are due to schools themselves – this is not reliant on support from a central service |
| As the 'MEAG' grant has reduced outcomes of EAL learners have increased |
| Schools are highly effective in enabling the progress and achievements of learners and this is the responsibility of schools |
| School-to-school work is the role of the challenge advisers – there are excellent schools who can support others |
| Cuts to BTA services will have a negative impact |
| It is essential that these learners are not overlooked/there is more resistance at national level |

1.7 Responses from Other Stakeholders

Three responses were received from other stakeholders:

- EYST (Ethnic Youth Support Team)

Key points:

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|--|
| Agreement that individual school capacity to meet the needs of EAL learners/minority ethnic learners should be increased |
| Research by Show Racism the Red Card and via EYST focus groups has shown that many schools are not currently equipped to respond to racist incidents and bullying or have the knowledge to embed ethnically diverse role models into lessons |
| Providing EAL support is a specialist matter |
| The proposal to cut the central service before schools have the capability to independently support EAL learners will have a negative impact on all learners |
| BTAs are needed to support new arrivals and their parents |
| It will take time to ensure class teachers are trained to meet additional expectations in terms of EAL learners |
| A less drastic reduction should be considered whilst building capacity |
| Cutting the employment of BTAs will reduce the number of ethnic minority role models in schools – there should be retention of these staff |
| Focus group evidence from 22 Swansea pupils showed that specialist workers were valued/most had experienced racism and lacked faith that schools would respond appropriately so did not report/most felt their identities and histories were not reflected in the curriculum |
| The withdrawal of funding to support ethnic minority learners signals that equity in education is not a priority for local authorities and Welsh Government – support for EAL and ethnic minority learners should be adequately funded |
| An authentically diverse curriculum should be developed and teachers should be trained in cultural competence and effectively responding to racist incidents |
| Programmes should be in place to raise the attainment of underachieving ethnic groups |

- The Chinese in Wales Association (CIWA) carried out a culturally and linguistic survey to seek the opinion of the local Chinese residents. 86 parents, representing 138 school students completed the questionnaire. 85 were first language Mandarin speakers. Also one individual from CIWA submitted an email which we have included as part of the consultation.

Key Points:

| |
|---|
| Parents were sad and dismayed to hear that funding for the service had been removed |
| They did not feel their voice would be heard |
| 95% of the parents feel their children would still need additional support at school |
| Concerns over inadequacy of interpreting services/poor translation |
| 85% are worried that they cannot communicate with the schools |
| 90% did not understand the proposal of "moving to a model of a small central advisory service that supports all schools..." |
| Mis-match noted between Chinese interpreters registered with Welsh Interpretation and Translation Service (WITS) and the two main variants of Chinese (Mandarin and Cantonese). |

Common terms used to describe additional learning needs can be stigmatising.

- Poverty and Prevention Council Officers – Vulnerable Persons Resettlement Scheme and Vulnerable Children’s Resettlement Scheme (VPRS & VCRS)

This submission from two individuals contained an alternative model for VPRS support than that contained within the original proposal. The respondents propose that the staff funded via the Home Office VPRS funding, which is held by Poverty and Prevention, remain as part of the central EMAU team. In addition to the 3 fte Arabic BTA posts already in place, funding would be provided for an additional 0.5 fte BTA post for any additional language needs over and above Arabic. A 0.5 fte teacher post would also be funded to liaise with schools over the admission of pupils and training of school staff. New job descriptions would be created on a temporary basis until March 2021, the likely end date of the funding.

Section 2

CONSULTATION RESPONSES - EMAU Staff and Union Consultation

In total 24 responses were received representing 55 views. Respondents included specialist teachers, BTAs, A&OA staff and Unions. There were 5 collective responses and 19 individual responses. It should be noted that some staff sent in individual responses as well as contributing to collective responses. In a number of these responses the same or similar comments were made in both the individual and collective submissions. The comments are summarised in the tables below:

| Key Comments | % (of total responses) |
|---|---------------------------|
| Increased workload/pressure on school staff/assessment on impact on workload needed | 73% |
| Negative impact on achievement/attainment/standards of all pupils (e.g. due to added workload on class teachers) | 67% |
| Negative impact on wellbeing/emotional/pastoral support of EAL learners | 51% |
| Access to/cost of interpreting and translating services for schools | 45% |
| Loss of highly skilled, experienced staff with specialist qualifications/dissipation of specialism | 44% |
| Loss of specialist/unique role that specialist teachers carry out e.g. initial EAL assessments, capacity building, interventions, voice for EAL learners | 44% |
| Negative impact on achievement/attainment/standards of EAL learners | 42% |
| Loss of specialist/unique role that BTAs carry out e.g. home language assessments, settling new arrivals, supporting in literacy and numeracy tests, developing home –school links | 42% |
| Limit equal access to the curriculum and high quality learning for supported EAL learners | 38% |
| Not in accordance with Equalities Act 2010/ principles of City of Sanctuary/articles of UNCRC (United Nations Convention on the Rights of the Child) etc. | 38% |
| Schools do not have the specialist knowledge/are not ready to take on provision for EAL learners/rely heavily on the support | 38% |
| 3 staff replacing 39 cannot maintain the same high standards/levels of attainment/task is too challenging/too small | 36% |
| Devolved money to be distributed from FY2019-2020/schools will not employ staff from January to March/maintain the current model until 31 March 2019/stagger the reduction over a longer period | 27% |
| Head of Unit not needed as team is small/additional post should be doing advisory work | 25% |
| Disagree with the move to Soulbury/should remain on teacher's terms and conditions | 25% |
| Potential that schools will set-up inappropriate/detrimental practice | 25% |

| | |
|--|-----|
| Schools using devolved money to employ EMAU staff is unrealistic/schools will use own staff with no specialist expertise | 25% |
| Concern over the exit strategy/workload July to December | 24% |
| Schools have transient language needs so will be difficult to employ BTAs | 20% |
| Sharing best practice has funding implications for schools in terms of releasing staff | 20% |
| Uncertainty over funding will be moved from local authority to schools | 20% |
| Negative impact on inclusion/involvement in school life with potential to become disaffected/NEET for EAL learners | 11% |
| The cut is too quick/not enough specialist resource in place in schools | 11% |

Other Points/Comments – 10% or less

| Comments |
|---|
| Retaining a central service would mean even schools with low numbers would be catered for |
| Funding should not be devolved/not based on evidence |
| Schools need and value EAL services in our schools |
| Detrimental to Welsh Government National Mission – ‘strong and inclusive schools...’ |
| Proposals are purely based on funding and not best quality educational provision |
| Proposed model is not sustainable for schools |
| Proposed model does not meet the needs of schools, learners, parents |
| Should be more minority ethnic/multilingual role models in schools/BTAs provide this |
| Why is the Council cutting the EMAU budget? |
| Funding schools receive through different grants should be expanded to pupils who have EAL |
| Schools allocated funding per pupil (EAL?) – schools with greater need could employ their own teachers and BTAs |
| England successfully moved to this model of provision – this information is incorrect |
| Issue should be raised with Kirsty Williams and relevant MPs in Westminster |
| Proposals disproportionately affect pupils from minority ethnic backgrounds – Welsh speakers are treated more favourably |
| Issues with the wider stakeholder consultation |
| Funding levels/allocations for this year and next year not clear at time of consultation |
| Proposals do not meet assurances that the Local Authority will continue to prioritise frontline services for minority ethnic/EAL learners |
| Staff consultation is flawed/has been rushed to meet 31 May deadline to serve redundancy notices for teachers |
| Losing BTAs would mean not meeting Corporate Priorities – Safeguarding Vulnerable People, Improving Learner Attainment etc. |
| Current BTA languages are a minority compared to overall languages spoken – many EAL learners do not have BTA support/this is unfair |
| Change/transformation is needed/budgetary issues have to be acknowledged |
| It is the responsibility of all schools to address the needs of Minority Ethnic/EAL learners |

ALTERNATIVE PROPOSALS/MODELS – EMAU Staff and Trade Unions

16 alternative models were proposed within the responses. These differ significantly ranging from a service of only BTAs to a service with only teachers with a number of models suggesting modified versions of the current service. These models are summarised below:

| | |
|--------------------------------|--|
| Proposed by: | Collective Response – 15 Staff |
| Structure: | Head of Unit or Head of Vulnerable Learner Service A & OA – as current ftes BTAs – as current ftes Specialist Teachers - none |
| Role/Function/Benefits: | BTAs retain current role and take on some of the current responsibilities of specialist teachers |
| Funding: | Savings made by having no specialist teacher posts |

| | |
|--------------------------------|--|
| Proposed by: | Individual |
| Structure: | Head of Unit (1 fte) A & OA (1 fte) 1 Team Leader (1 fte) 6 Specialist Teachers (6 fte) 5 BTAs – key/main languages (3 fte) |
| Role/Function/Benefits: | School improvement/capacity building with possibility of developing regional working Retention of interpreting and translating services BTA support for most vulnerable learners Home Language Assessment |
| Funding: | Devolve less of the additional funding to schools |

| | |
|--------------------------------|---|
| Proposed by: | Individual |
| Structure: | Head of Unit (1 fte) A & OA (1.7 fte) 1 Senior Team Leader (1 fte) Specialist Teachers (10.4 fte) BTAs (11.6 fte) |
| Role/Function/Benefits: | Specialist teachers continue as per current role but work with clusters of schools (400 red/amber pupils ?? per 1 fte teacher) BTA support continues as per current role |
| Funding: | Take a small amount off of each schools budget Or EMAU to be part of the 'SLA for Swansea' |

| | |
|---------------------|---|
| Proposed by: | Individual |
| Structure: | Head of Unit A & OA (1.5 fte) 1 Deputy Head or Team Leader 6/7 Specialist Teachers |

| | |
|--------------------------------|---|
| | BTAs reduced but all current languages retained |
| Role/Function/Benefits: | Specialist teachers responsible for a cluster – no pupil support but capacity building with schools and parents BTA – move away from on-going pupil support – one-off settling only. Mainly used for interpreting and translating. |
| Funding: | Schools buy-in BTA support Interpreting and translating could be offered to other Council departments who could be re-charged Additional BTA languages could be employed on a casual basis. |

| | |
|--------------------------------|--|
| Proposed by: | Individual |
| Structure: | Head of Vulnerable Learner Service A & OA 6 Specialist Teachers BTAs – revised to meet top 10 languages |
| Role/Function/Benefits: | None provided |
| Funding: | None provided |

| | |
|--------------------------------|---|
| Proposed by: | Individual |
| Structure: | 5/6 Specialist Teachers |
| Role/Function/Benefits: | Capacity building and direct pupil support at KS4 Council set up own interpreting and translating service – BTAs could be used within this service |
| Funding: | None provided |

| | |
|--------------------------------|---|
| Proposed by: | Individual |
| Structure: | 5/6 specialist teachers |
| Role/Function/Benefits: | Capacity building and direct pupil support at KS4 Council set up own interpreting and translating service – BTAs could be used within this service |
| Funding: | None provided |

| | |
|--------------------------------|--|
| Proposed by: | Individual |
| Structure: | As current structure but reduce working days to 3.5 Reduce number of team leaders Re-evaluate language need and reduce BTA support accordingly |
| Role/Function/Benefits: | Support by cluster – capacity building and training on a cluster basis Pack of what is to be offered to schools Training delivered centrally Online resources Central helpline |
| Funding: | Schools can opt in for central service |

| | |
|--|---|
| | If schools opt out they have devolved funding monitored by challenge advisers – they would be recharged for any usage of central services Savings would be made by reducing to 3.5 days Create a Council interpreting and translating service for schools. In time re-charge other departments for usage. |
|--|---|

| | |
|--------------------------------|--|
| Proposed by: | Individual |
| Structure: | 5 specialist teachers Current team of BTAs |
| Role/Function/Benefits: | Work in clusters |
| Funding: | Small amount from each school's budget via a formula/or from the 'SLA for Swansea' |

| | |
|--------------------------------|--|
| Proposed by: | Union + 2 individuals |
| Structure: | 2 part service – one centrally funded + SLA |
| Role/Function/Benefits: | None provided |
| Funding: | Central funding SLA paying according to level of service required |

| | |
|--------------------------------|--|
| Proposed by: | Individual |
| Structure: | 1 Head of Unit (Soulbury) 2 Specialist Teachers (Soulbury) 2 BTA team leaders from top 4 languages (term-time only) 2 A&OA (term-time only) Flexible BTA unit – employed via agency |
| Role/Function/Benefits: | Head of Unit – strategic lead Teachers - Advisory/capacity building initiatives/training assessment/moderation BTAs – interpreting/home-school links/home language assessment/some direct pupil support Train agency/school staff Schools apply for pupil support via on-line system for most vulnerable learners for duration of need – staff sourced via agency allowing flexibility. Matrix of criteria used to identify target group |
| Funding: | Council to consider some additional central funding to maintain some BTA capacity. School's pay for BTA support over and above what can be provided centrally. Interpreting/translating not available centrally but sourced via thebigword and WITs. |

| | |
|--------------------------------|---|
| Proposed by: | Collective – 11 staff |
| Structure: | 6 teaching posts (not Soulbury) |
| Role/Function/Benefits: | Cluster working based on EAL need not existing Secondary/feeder primary clusters Each teacher to have a specific role e.g. new arrivals, asylum seekers |
| Funding: | Keep back some of the money to be devolved Save money by remaining on teachers terms and conditions |

| | |
|--------------------------------|---|
| Proposed by: | Individual |
| Structure: | 8 teaching posts (not Soulbury) Retain BTA translation service |
| Role/Function/Benefits: | Cluster working based on EAL need not existing Secondary/feeder primary clusters Each teacher to have a specific role e.g. new arrivals, asylum seekers |
| Funding: | Keep back some of the money to be devolved Save money by remaining on teachers terms and conditions and not employing on Soulbury |

| | |
|--------------------------------|--|
| Proposed by: | Individual |
| Structure: | 5 'practitioners' – 1 with co-ordination responsibilities Possibly retain a small BTA service |
| Role/Function/Benefits: | None provided |
| Funding: | Small amount from schools' budgets Part of 'Swansea SLA' Do not delegate |

| | |
|--------------------------------|---|
| Proposed by: | Union |
| Structure: | 6 Specialist Teachers |
| Role/Function/Benefits: | None provided |
| Funding: | Central Service costed at £400K – devolve less of the money |

| | |
|--------------------------------|--|
| Proposed by: | Union -2 |
| Structure: | Retain BTAs |
| Role/Function/Benefits: | None provided |
| Funding: | Set-up SLAs with schools Recharge other Swansea Council departments for interpreting and translating Sell translation services to other organisations outside of the Local Authority e.g. Police, NHS etc. |

Section 3

SUMMARY OF PROPOSALS FOR ALTERNATIVE MODELS

| |
|---|
| The majority of wider stakeholders wanted the central service to remain as it is. There was a focus on bilingual support and the need for interpreting and translating services to remain, in particular. However, very few respondents made any suggestions of how such a service could be funded in the future. |
| Within the EMAU staff consultation there were a number of different options/proposals presented (see Section 2 above). These varied extensively from a service composed of just BTAs to a service composed of a small number of specialist teachers – mainly 5/6 with cluster working arrangements. There were also a number of variations of the current central service model with BTAs and specialist teachers involved. Whilst the models would cost varying amounts they exceeded the £210K for the central team in the original proposal. Suggestions for funding were to: not devolve as much funding to schools; top slice off of school budgets; have an SLA; generate income by providing interpreting and translating services outside of education. |
| Head teacher respondents specified: one post to remain centrally; devolving of funding to schools via EAL numbers not a formula; adequate/increased funding to allow them to employ BTAs/TAs; the need for bilingual support and interpreting and translating services. |
| The Poverty and Prevention, Partnership and Commissioning Team made specific proposals with regard to the staffing of the VPRS and VCRS supported families and children based on a model of direct pupil support. This does not align with Welsh Policy regarding ethnic minority achievement services which suggest a capacity building model aimed at developing whole school approaches within a sustainable funding context. |
| |

Section 4

KEY THEMES

There are a number of themes that strand through comments made across the different groups of respondents in both consultations. These are listed below:

Key Themes

1. The support is invaluable/the service should stay as it is and should not be cut/support is specialist
2. There will be a negative impact on the progression/attainment/achievement of EAL learners
3. There will be increased workload for class teachers/school staff
4. BTA support is particularly valued for beginners in English/new arrivals/home school links
5. There is a significant need for interpreting and translating services
6. There will be an impact on the achievements/attainment of all pupils
7. Equality of access to the curriculum will be impacted upon for EAL learners
8. There will be a negative impact on the inclusion of learners and families/wellbeing of EAL learners
9. Devolving of funding should be based on numbers of EAL learners
10. Schools and school staff are not ready to take this on – 3 central staff will not be enough

An analysis and professional commentary on each of the themes is given below:

1. The support is invaluable/the service should stay as it is and should not be cut/support is specialist

It was very evident that a significant number of respondents highly value the support and the service as a whole. There were many comments with regard to this with a number of respondents specifically mentioning the excellent work of individual specialist teachers and BTAs:

'EMAU provides an essential service in school. A service which has helped many pupils who are new to the English language' (Online questionnaire)

'EMAU are a vital service that is needed more and more in multicultural Swansea' (Online questionnaire)

'The support given by the EMAU service has been crucial' (School Staff)

In addition, a number of comments credit the specialism/specialist role of the service:

'Providing EAL support is a specialist matter' (Other Stakeholder)

'They are specialists' (Online Questionnaire)

'Teachers have undertaken specialist EAL qualifications' (EMAU Staff)

However, in contrast, within the head teacher responses there was a view that class teachers were already skilled in the area of teaching learners with EAL:

The teachers in my school are highly skilled at teaching pupils with additional language needs..... There is a wealth of experience in Swansea schools already (Head teachers)

Many respondents, across different groups, felt that the service should remain as it is. They deemed the proposed change to the model of service delivery as a 'cut' or closing down of the service rather than a different way of providing support for EAL learners by devolving/passing the funding to schools. There was minimal acknowledgement of the information provided in the consultation document that stated that the service in its current format is not meeting demand and that any future model needs to be considered in the context of reducing funding from the Welsh Government:

I do not agree to closing down EMAU (Parent/Carer)

A service that is oversubscribed cannot be cut (Online Questionnaire)

I would suggest the centralised EMAU service be bigger (Online Questionnaire)

Keep the service (Pupil Voice Forum)

It is absolutely essential to maintain a proper team that is supported by the LA... and fully funded (Online Questionnaire)

I think it is totally wrong to make these changes to a service that is in great demand. The work that is done in school is tremendous.... (Online Questionnaire)

In addition, whilst many respondents did not want the service to be 'cut' or wanted the current central service to remain (as above) they did not make suggestions as to how the service could be funded in the future, given that monies from the Welsh Government are predicted to decrease or potentially cease. There was general concern about the cuts and decreasing funding stranding through responses with some implications that the local authority should ensure services are funded. The main suggestions for ongoing funding for a central service came from EMAU staff consultation responses suggesting that money could be top-sliced from school budgets or a service level agreement (SLA) could be set-up. However, no head teacher or school put forward these suggestions with the preference from the head teachers being to have the devolved funding albeit a greater amount.

It was also suggested in the EMAU staff consultation responses that interpreting and translating services could be provided for other council departments and other bodies outside of the local authority to generate an income stream. However, this is currently not feasible as the authority already has a partnership agreement with WITS (Welsh Interpretation and Translating Service) for provision of these services.

2. There will be a negative impact on the progression/ attainment/ achievement of EAL learners

Many respondents, across different groups, stated that not having a central service providing support would have a negative impact on the attainment and achievement of EAL learners:

The cuts will have a detrimental effect on the achievement of EAL learners (Online Questionnaire)

The proposal will have a detrimental effect on EAL achievement (EMAU Staff)

However, within the head teacher responses it was made clear that ensuring the progress/attainment/achievement of EAL learners is specifically the responsibility of schools and that this is currently being done 'highly effectively' as it is the basis of ERW/Estyn inspections:

'The achievement of learners is already the responsibility of schools. Schools have never defaulted this to an outside agency....' (Head teachers)

Additionally there is lack of evidence, when considering the impact on EAL learner achievement/attainment, that any specific type of support model is more beneficial than any other. For example, there is no specific evidence that a central service is more beneficial than devolved funding models:

As the 'MEAG' grant has reduced outcomes of EAL learners have increased (Head teachers).

This point is further corroborated by the local authority attainment data which shows that as EMAU staffing allocations to schools have reduced by around 45% over the last four years there has not been an overall, detrimental impact on attainment. The slight fluctuations are likely to be cohort issues linked to the factors listed further below.

Summary of results for EAL pupils

| Key stage | Year | non-EAL | EAL | Gap |
|-----------|------|---------|------|------|
| FP (FPI) | 2017 | 85.9 | 85.0 | -0.9 |
| FP (FPI) | 2016 | 85.3 | 85.2 | -0.1 |
| FP (FPI) | 2015 | 86.5 | 85.2 | -1.3 |
| KS2 (CSI) | 2017 | 89.7 | 91.9 | 2.2 |
| KS2 (CSI) | 2016 | 87.8 | 91.5 | 3.7 |

| | | | | |
|-----------|------|------|------|------|
| KS2 (CSI) | 2015 | 89.0 | 91.8 | 2.8 |
| KS3 (CSI) | 2017 | 88.8 | 89.1 | 0.3 |
| KS3 (CSI) | 2016 | 87.2 | 85.6 | -1.6 |
| KS3 (CSI) | 2015 | 83.9 | 82.4 | -1.5 |
| KS4 (L2+) | 2017 | 58.8 | 62.8 | 4.0 |
| KS4 (L2+) | 2016 | 66.2 | 67.9 | 1.7 |
| KS4 (L2+) | 2015 | 64.1 | 73.3 | 9.2 |

Whilst it could be argued that more specific targeting of learners 'on the cusp' by the service may have mitigated against the reductions in staffing, many EAL learners in the target group do not get significant amounts of weekly support (see 3 below).

Research such as: English as an Additional Language (EAL) and educational achievement in England: An analysis of the National Pupil Database (Professor Steve Strand, Dr Lars Malmberg, Dr James Hall University of Oxford Department of Education 29th January 2015), recognises the heterogeneous nature of the EAL group, but specifies that a number of factors impact on the attainment of EAL learners. Detailed analyses of the 2013 KS2 and KS4 results in England were undertaken in order to identify background variables associated with increased risk of low attainment among EAL students. The key factors identified were: *Identified SEN; international arrival during the key stage; pupil mobility; ethnic group; entitlement to FSM; neighbourhood deprivation; region; age; gender.*

Attainment data gathered as part of an ERW minority ethnic achievement working group also demonstrated that attainment across the ERW local authorities is comparable even though different support models are in operation from more direct pupil based support through to devolving of money to schools with no central staff.

In addition, in September 2015 Cardiff Council delegated the majority of its EMTAS posts to schools retaining only a significantly reduced central team with a school improvement remit and small team for new arrivals. As the extracts from: Cabinet 18 Jan 2018 Performance of Cardiff Schools below demonstrate since the change in model, improved attainment for EAL learners has been seen:

2.20 There were improvements in the performance of pupils with English as an Additional Language (EAL) in 2017 (87.75%). This compares to 88.47% of all pupils in Cardiff. Overall, EAL attainment has improved by 5.82ppts since 2014. (Foundation Phase)

3.19 The proportion of pupils with English as an Additional language achieving the Core Subject Indicator at the end of Key Stage 2 is 88.17%. This compares with 89.38% of all pupils in Cardiff. Overall, EAL attainment has improved by 4.47ppts since 2014.

4.21 Performance of pupils with EAL has increased by 7.67ppts since 2014 (Key Stage 3 CSI)

Similarly, the Welsh Government 'Evaluation report on capacity building approaches to support the delivery of English as an additional language in Wales' September 2015 notes that: *In England the Ethnic Minority Achievement Grant was ended in 2011 and the money went into a Dedicated Schools Grant, which meant it was not ring-fenced to provide support to pupils with EAL needs. A year later a report from the NASUWT identified significant decreases in levels of support from specialist minority ethnic achievement services and English as an additional language support services at the local authority level and within schools. However, EAL learner achievement levels at Key Stages 1, 2 and 4 have continued to improve despite these changes.*

However, it is also acknowledged that in the Cardiff model there has been retention of specialism in schools as central staff were delegated in the first instance. In addition, research by the Education Policy Institute (February 2018) recognises that *'The current good GCSE results observed on average for EAL pupils must be interpreted in the light of the fact that recent GCSE cohorts underwent primary education during the era in which the Ethnic Minority Achievement Grant (EMAG) provided local authorities with ringfenced funds'*.

As originally stipulated in the proposed model, there will be a need to continue to monitor attainment of minority ethnic and EAL learners at local authority level to ensure there are no negative impacts of changes to the model or continued reductions in funding. However, as previously stipulated, the responsibility to ensure the achievement and attainment of EAL learners, through appropriate provision, ultimately lies with individual schools. If individual schools perceive that specialist support has impacted positively on attainment of its own EAL learners, then, should funds be devolved to schools, it would be incumbent upon those schools to ensure that the necessary specialist support continues.

3. There will be increased workload for class teachers/school staff

A number of respondents referred to concern over increased workload for class teachers and school staff. This was the most significant concern stated in the EMAU staff consultation. Some respondents commented that class teachers would struggle to provide for individual EAL learner needs:

EAL learners will be clearly disadvantaged in their learning, due to not having the support they need. This will furthermore put additional strains and pressures on class teachers to meet the needs of all pupils. (EMAU Staff Consultation)

Class teachers can't cater for the needs of beginner learners in class/give them the time they need. (School Staff)

Schools will be under too much pressure with the added responsibility. (Parents)

However, workload of class teachers was not highlighted as an issue by head teachers:

Schools manage extremely well when EMAU staff are not in their classrooms

The teachers in my school are highly skilled in teaching EAL pupils.....

Allocations of EMAU support to schools and hence pupils have already dropped significantly over the last four years - by 45%. During the last two years, to mitigate against reductions in specialist teachers, 43 (62%) out of the 69 supported schools now only receive blocks of specialist teacher support rather than weekly support. Referred EAL learners are 'RAYG' rated in order to prioritise support. 'Red' learners are those 'on the cusp' of attaining expected outcomes at the end of the key stage and 'amber' learners are those who are at more general risk of underachievement, mainly earlier stages of EAL acquisition. The 'red' and 'amber' pupils form the 'targeted' learners. Out of the 1,475 'targeted' red and amber learners around 440 learners (30%) are in schools with no weekly teacher support. In addition, specialist teachers in schools with weekly allocations, in the majority of cases do not have capacity to support all of the 'targeted' learners on a weekly basis. In general, only red learners in the 26 schools with weekly teacher allocations will get direct weekly support. Even then this will only be for a minimal amount of the school week. The available specialist teacher allocation/pupil contact time per week when divided amongst the targeted pupils averages out at 13 minutes per week. Some 'targeted' EAL learners are also in receipt of BTA support, although many are not and again this will be for a small amount of time in the week – around one and a half hours (see 4 below).

Overall, during any given week, only a minimal percentage of EAL learners will be getting any direct support and for those learners this will only be for a small portion of their time in school. Therefore for the majority of the school week class teachers and schools are already solely responsible for providing for these learners. In the original proposal, funding was to be devolved to schools. Whilst some issues have been highlighted with this (see 9 below), the intention was that schools with larger EAL populations could employ additional staffing for any direct pupil support, ideally current EMAU staff, mitigating against some of the loss of central staff.

4. BTA support is particularly valued for beginners in English/new arrivals/home school links

There was significant support and value, across the groups of respondents, placed on the role of the BTAs for supporting new arrivals and beginners in English, in particular. In addition, the role played in home-school links was seen as key (see 5 below).

One pupil said that they had moved to Swansea from Iraq and had relied on the EMAU support provided by his Arabic teaching assistant. (Pupil Voice Forum)

It is the BTA support we need.... (head teachers)

Having BTAs in our school makes a huge difference... (Parents)

I feel the considerable benefit the BTAs have in the school environment for all learners attainment has been overlooked (EMAU Staff)

Whilst the value placed on this role for beginners in English is in no doubt, the inequity that currently exists in terms of provision of bilingual support cannot be overlooked. The importance of this support for pupils, parents and class teachers that is indicated in the responses is almost of concern when the amount of time learners have this support for in a week and for learners and families who do not get access to this support is considered:

We want more bilingual teachers, one-to-one teacher once a week is not enough (Parents/Carers)

It would be great if it (bilingual support) is in Tamil. (Parents/Carers)

Small daily problems – they (children) need help and support and have to wait as the bilingual teacher comes once a week

The sustainability and equity of bilingual support models therefore needs to be questioned. The demand for bilingual support will never be met for all EAL learners whether this be at central service or school level. Demand changes and diversifies over time and the number of languages is too broad. The parents quoted above also feel that although their children have bilingual support the amount of support is not enough. 289 EAL learners are currently supported bilingually in 10 languages (March 2018). A further 375 EAL learners fit the criteria used for allocating bilingual support. This equates to over 56% of pupils who fit the criteria not having access to this support. Of these pupils 328 are stage A – beginners in English. Overall, stage A learners in total have 50 home languages other than English or Welsh. Only 20% of these languages are currently being supported. As with specialist teachers the amount of bilingual support over the course of the week that the central service can offer for pupils that have this support is a minimal amount of the time that a pupil is in school. Therefore the onus is very much on the school and class teacher to provide for these learners for most of the week. As recognised in the Welsh Government 'Evaluation report on capacity building approaches to support the delivery of English as an additional language in Wales' September 2015:

'the increasing numbers and range of needs make it unrealistic to expect to be able to offer everyone a bi-lingual teaching assistant, so schools have to develop the capacity to meet the needs themselves.'

In essence, broader strategies need to be developed alongside bilingual support. In addition, the focus on early stages and bilingual support detracts away from learners at higher stages of acquisition who need support to further develop literacy skills and academic English. Additionally, whilst usage and valuing of home languages in the school environment must be advocated, there is no specific evidence that bilingual support speeds up acquisition of English. For example, when looking at the services own model of anticipated progress in EAL acquisition for 2016-17 data, 64% of stage A and B learners with bilingual support made the expected progress whilst 66% of stage A and B learners without bilingual support

also made the anticipated progress. As a learner in the pupil voice forum who had received support in reception and year 1 from a bilingual TA commented, "I would have still got there without the TA".

5. There is a significant need for interpreting and translating services

The need for interpreting and translating services was widely acknowledged across a number of respondents from many groups:

Our language abilities in English are limited and hence we need the language support. This allows us to communicate better with the teachers (Parents/Carers)

There needs to be interpreting for parents between the teachers and parents (Parents/Carers)

My parents need translation (Online Questionnaire CYP)

A crucial role of the BTAs is to translate and interpret not only for the pupils but also for school staff, parents and outside agencies. (EMAU Staff Consultation)

The need for interpreters is greater than ever (Head teachers)

The number of requests that the service processes can back up the need for interpreting and translating services for parents/carers. Currently, this academic year 387 requests have been processed with 124 of these being for multiple pupils/families. However, requests are predominantly for the languages that the service provides. 18 requests in 10 different languages have been processed for languages over and above those provided by the service. Therefore it could be assumed that parents/carers of other languages with minimal skills in English have their own independent strategies for understanding/accessing school information, schools have their own strategies in place or conversely the needs of many parents/carers are not being adequately met.

6. There will be an impact on the achievement/attainment of all pupils

Refer to the information contained in points 1, 2 and 3. In summary: ensuring the achievement and attainment of all pupils, as stated by head teachers, is the responsibility of class teachers and schools. The amount of support given to individual teachers and EAL learners currently from the central service could be deemed as negligible when the whole picture is taken into account.

In addition, the research, English as an Additional Language (EAL) and educational achievement in England: An analysis of the National Pupil Database (Professor Steve Strand, Dr Lars Malmberg, Dr James Hall University of Oxford Department of Education 29th January 2015) comments that;

'In the current study we found that the percentage of EAL students in the school had minimal association with student attainment or progress when controls for student background were included. If anything, FLE (first language English) students had marginally higher attainment and made marginally more progress in

high % EAL schools than in low % EAL schools, net of all other factors. Thus this analysis gives no evidence that FLE students suffer from attending a school with a high % EAL students.'

7. Equality of access to the curriculum will be impacted upon for EAL learners

8. There will be a negative impact on the inclusion of learners and families/wellbeing of EAL learners

A number of respondents referred to potential issues around access to the curriculum/inclusion/wellbeing.

The BTAs often attend to the emotional needs of pupils.. (Online Questionnaire)

The support given by the EMAU service has been crucial – both by ensuring the involvement and inclusion of parents and children(School Staff)

The children will be at a disadvantage and many won't be able to access a full curriculum in school without support. (Parents/Carers)

(See 3 and 4 above) Many learners do not have direct support and where there is support this is only for a small amount of time in the week. Wellbeing and inclusion were often linked to access to bilingual support and interpreting and translating services. The reliance and value placed on this by respondents in all groups, particularly parents and pupils who have access to this support was overwhelming. A sense of potential isolation could be felt in a number of the responses – *85% are worried they cannot communicate with schools* (other stakeholder). However, this brings into question what is in place/inclusion for the many learners who do not have bilingual support and many families do not have regular/easy access to interpreting. As discussed in 4 above, sustainability of bilingual support staff models and covering the needs of all is near impossible. Therefore, wider strategies and capacity needs to be built into the whole system. The responsibility already mainly lies with the school and class teachers to ensure access to the curriculum, inclusion and to have appropriate strategies for communicating with parents/carers when central staff are not available.

As one head teacher commented: *'schools are already inclusive organisations'*

9. Devolving of funding should be based on numbers of EAL learners

Where respondents supported the devolving of funding to schools the consistent opinion was that devolving should be based on EAL learner numbers i.e. not via a needs based formula or based on minority ethnic pupil numbers. There was no support for devolving £500 to each school. Head teachers felt that the devolved funding per school in the proposal was not enough to employ BTAs or TAs to equivoval levels of current support provided by the central service:

I strongly disagree with the proposal of giving £500 to schools with no EAL learners (Online Questionnaire)

Devolve to schools but not with a formula – simply based on amount of EAL learners (Online Questionnaire)

The devolved funding is inadequate The funding will be inadequate to provide any type of meaningful provision (Head teacher)

Whilst there are advantages of devolving of funding to schools based on numbers i.e. stages of EAL are more likely to be accurately assessed there are some disadvantages. Funding can end up being weighted towards schools with high numbers of near fluent EAL learners. It also does not allow any weighting for EAL learners who are late-comers into upper key stages for whom the challenge to attain expected outcomes is greater.

10. Schools and school staff are not ready to take this on – 3 central staff will not be enough

A number of respondents commented that schools/teachers were not equipped to take this on and therefore more staff would be needed centrally:

Schools are able to take direction, but not necessarily initiate best practice nor see the bigger picture (EMAU Staff)

Schools are far from ready to meet the needs of their EAL learners (Online Questionnaire)

The proposal for the advisory service option is too small and can't possibly compensate for the sterling work of the teachers (Online Questionnaire)

It was felt that more work would need to be done in schools where EMAU staff are based to support teachers to provide the support. (Pupil Voice Forum)

It will take time to ensure that classroom teachers are trained to meet additional expectations in relation to EAL students. (Other Stakeholder)

In a sense the reliance on bilingual support mentioned by many parents/carers in order for their children to understand the teacher would imply that there are not enough other relevant strategies in place within classrooms when bilingual support is not available. This was echoed by one online respondent: *What I see now in schools is the pupils who have lost the bilingual support are left to do colouring because they can't understand and can't do the classwork.*

In the current academic year 100 training sessions and 129 formal capacity building projects with individual class teachers have been planned. 100% of class teachers receiving capacity building activity up to the end of the spring term rated that they had improved their knowledge, confidence and skills in relation to teaching EAL learners.

Head teachers also commented:

I do not need to send my teachers on courses, they are skilled and experienced and in the event of needing further professional development there is a wealth of experience within Swansea schools already

The teachers in my school are highly skilled at teaching EAL pupils.....

Schools manage extremely well when EMAU staff are not in their classrooms...

There is a wealth of experience in Swansea where we can look for school-to-school support.....

Section 6

CONSULTATION CONCLUSIONS

- The original model that was proposed needs to be amended with a range of options considered to reflect the differing views evidenced in the consultation
- Minority ethnic and EAL learner attainment needs to continue to be monitored at local authority level to ensure there is no future detrimental impact
- Access to bilingual support for learners needs to be factored in, along with developing a wider range of strategies to build capacity within the system such as the use of volunteers/parents and implementing the Young Interpreter Scheme
- Interpreting and translating services for parents/carers needs to be available. Wider strategies for communicating with parents/carers need to be built up such as more linkage with communities themselves. Work needs to be done with WITS to build the number of more locally based interpreters in order to make these services more cost-effective
- Capacity does need to continue to be built and best practice shared within the current school improvement mechanisms, as per the original proposal
- The formula for devolving any funds to schools needs to be altered to be based on EAL learner numbers, although the assessing of stages of EAL for PLASC will still require moderation as recommended by the Welsh Government
- Any devolving of funding to schools needs to try to ensure that adequate monies are made available to schools with larger numbers of EAL learners in order that they have the potential to employ current EMAU staff. Thereby reducing the numbers of potential redundancies, retaining the specialism and ensuring minority ethnic role models in schools
- The future model needs to be transitional and sustainable in the context of reducing funding in order to meet with the terms and conditions of the funding that Welsh Government has put forward this year

Section 7

DEVOLVING OF FUNDING TO SCHOOLS

The overall amounts to be devolved are linked to the estimated costings of the proposed options contained in the main report and are based on numbers of pupils with EAL, as was the preference from the consultation responses, not by a points based formula.

| | |
|----------|-------|
| Option 1 | £210K |
| Option 2 | £390K |
| Option 3 | £420K |

It is suggested that further discussion about how funds could be devolved for each option is considered following the decision of Cabinet.

Option 1

Funding devolved to all schools based on numbers of EAL learners, stages A – D from reception to year 11. Schools missing from the list below currently do not have any EAL learners in reception to year 11 at stages A – D.

| School | Stages A-D (Rec- Y11) | £210,000.00 |
|---------------------------|-----------------------|-------------|
| Birchgrove Primary | 25 | £1,744.19 |
| Bishopston Primary | 2 | £139.53 |
| Blaenymaes Primary | 40 | £2,790.70 |
| Brynhafod Primary | 25 | £1,744.19 |
| Brynmill Primary | 118 | £8,232.56 |
| Burlais Primary | 45 | £3,139.53 |
| Cadle Primary | 68 | £4,744.19 |
| Casllwchwr Primary | 2 | £139.53 |
| Christchurch Ch. in Wales | 52 | £3,627.91 |
| Cila Primary | 8 | £558.14 |
| Clase Primary | 17 | £1,186.05 |
| Clwyd Community Primary | 41 | £2,860.47 |
| Clydach Primary | 7 | £488.37 |
| Craigfelen Primary | 8 | £558.14 |
| Cwm Glas Primary | 13 | £906.98 |
| Cwmrhydyceirw Primary | 28 | £1,953.49 |
| Danygraig Primary | 54 | £3,767.44 |
| Dunvant Primary | 19 | £1,325.58 |
| Gendros Primary | 15 | £1,046.51 |
| Glais Primary | 1 | £69.77 |
| Glyncollen Primary | 25 | £1,744.19 |

| | | |
|--------------------------------|-----|------------|
| Gors Community Primary | 92 | £6,418.60 |
| Gorseinon Primary | 12 | £837.21 |
| Gowerton Primary | 24 | £1,674.42 |
| Grange Primary | 11 | £767.44 |
| Gwrosydd Primary | 35 | £2,441.86 |
| Hafod Primary | 90 | £6,279.07 |
| Hendrefoilan Primary | 29 | £2,023.26 |
| Knelston Primary | 4 | £279.07 |
| Llangyfelach Primary | 1 | £69.77 |
| Mayals Primary | 16 | £1,116.28 |
| Morrison Primary | 26 | £1,813.95 |
| Oystermouth Primary | 9 | £627.91 |
| Parkland Primary | 98 | £6,837.21 |
| Penclawdd Primary | 8 | £558.14 |
| Pengelli Primary | 1 | £69.77 |
| Penllergaer Primary | 14 | £976.74 |
| Pentrechwyth Primary | 17 | £1,186.05 |
| Pentre'r Graig Primary | 31 | £2,162.79 |
| Penyrheol Primary | 10 | £697.67 |
| Plasmarl Primary | 20 | £1,395.35 |
| Pontarddulais Primary | 16 | £1,116.28 |
| Pontlliw Primary | 2 | £139.53 |
| Portmead Primary | 19 | £1,325.58 |
| Sea View Community Primary | 48 | £3,348.84 |
| Sketty Primary | 27 | £1,883.72 |
| St.David's R.C. Primary | 50 | £3,488.37 |
| St.Helen's Primary | 169 | £11,790.70 |
| St.Illtyd's R.C. Primary | 10 | £697.67 |
| St. Joseph's Cathedral Primary | 206 | £14,372.09 |
| St Josephs RC | 42 | £2,930.23 |
| St.Thomas' Primary | 59 | £4,116.28 |
| Talcopa Primary | 11 | £767.44 |
| Terrace Road Primary | 116 | £8,093.02 |
| Townhill Community Primary | 44 | £3,069.77 |
| Trallwn Primary | 20 | £1,395.35 |
| Waun Wen Primary | 73 | £5,093.02 |
| Waunarlwydd Primary | 4 | £279.07 |
| Whitstone Primary | 11 | £767.44 |
| Ynystawe Primary | 8 | £558.14 |
| YGG Y Login Fach | 2 | £139.53 |
| Birchgrove Comp | 10 | £697.67 |

| | | |
|------------------------|-------------|--------------------|
| Bishop Gore Comp | 207 | £14,441.86 |
| Bishop Vaughan Comp | 175 | £12,209.30 |
| Bishopston Comp | 22 | £1,534.88 |
| Cefn Hengoed Community | 32 | £2,232.56 |
| Dylan Thomas Comp | 50 | £3,488.37 |
| Gowerton Comp | 39 | £2,720.93 |
| Morrison Comp | 25 | £1,744.19 |
| Olchfa Comp | 201 | £14,023.26 |
| Pentrefod Comp | 125 | £8,720.93 |
| Penyrheol Comp | 13 | £906.98 |
| Pontarddulais Comp | 13 | £906.98 |
| Total Points | 3010 | £210,000.00 |

Option 2

Funding devolved to schools with 50 or more EAL learners, stages A – D, nursery to year 11.

| | Total Points | Funding allocation |
|------------------------------|--------------------------------------|--------------------|
| Primary School | Including N excluding Post 16 | £390,000.00 |
| Blaenymaes Primary | 49 | £7,708.75 |
| Brynmill Primary | 134 | £21,081.08 |
| Burlais Primary | 53 | £8,338.04 |
| Cadle Primary | 80 | £12,585.72 |
| Christchurch Primary | 57 | £8,967.33 |
| Clwyd Primary | 53 | £8,338.04 |
| Danygraig Primary | 63 | £9,911.25 |
| Gors Primary | 105 | £16,518.76 |
| Hafod Primary | 103 | £16,204.11 |
| Parkland Primary | 122 | £19,193.22 |
| Seaview Primary | 59 | £9,281.97 |
| St Davids Primary | 53 | £8,338.04 |
| St Helens Primary | 202 | £31,778.94 |
| St Josephs Cathedral Primary | 237 | £37,285.20 |
| St Thomas Primary | 70 | £11,012.51 |

| | | |
|------------------------------|-------------|--------------------|
| Terrace Road Primary | 145 | £22,811.62 |
| Townhill Primary | 53 | £8,338.04 |
| Waun Wen Primary | 83 | £13,057.68 |
| Bishop Gore Comp School | 207 | £32,565.55 |
| Bishop Vaughan Comprehensive | 175 | £27,531.26 |
| Dylan Thomas Comp School | 50 | £7,866.08 |
| Olchfa Comprehensive | 201 | £31,621.62 |
| Pentrehafod Comp | 125 | £19,665.19 |
| Total Points | 2479 | £390,000.00 |

| | | |
|--------------------------------|-----|------------|
| Gors Community Primary | 92 | £12,837.21 |
| Gorseinon Primary | 12 | £1,674.42 |
| Gowerton Primary | 24 | £3,348.84 |
| Grange Primary | 11 | £1,534.88 |
| Gwyrosydd Primary | 35 | £4,883.72 |
| Hafod Primary | 90 | £12,558.14 |
| Hendrefoilan Primary | 29 | £4,046.51 |
| Knelston Primary | 4 | £558.14 |
| Llangyfelach Primary | 1 | £139.53 |
| Mayals Primary | 16 | £2,232.56 |
| Morrison Primary | 26 | £3,627.91 |
| Oystermouth Primary | 9 | £1,255.81 |
| Parkland Primary | 98 | £13,674.42 |
| Penclawdd Primary | 8 | £1,116.28 |
| Pengelli Primary | 1 | £139.53 |
| Penllergaer Primary | 14 | £1,953.49 |
| Pentrechwyth Primary | 17 | £2,372.09 |
| Pentre'r Graig Primary | 31 | £4,325.58 |
| Penyrheol Primary | 10 | £1,395.35 |
| Plasmarl Primary | 20 | £2,790.70 |
| Pontarddulais Primary | 16 | £2,232.56 |
| Pontlliw Primary | 2 | £279.07 |
| Portmead Primary | 19 | £2,651.16 |
| Sea View Community Primary | 48 | £6,697.67 |
| Sketty Primary | 27 | £3,767.44 |
| St.David's R.C. Primary | 50 | £6,976.74 |
| St.Helen's Primary | 169 | £23,581.40 |
| St.Iltud's R.C. Primary | 10 | £1,395.35 |
| St. Joseph's Cathedral Primary | 206 | £28,744.19 |
| St Josephs RC | 42 | £5,860.47 |
| St.Thomas' Primary | 59 | £8,232.56 |
| Talycopa Primary | 11 | £1,534.88 |
| Terrace Road Primary | 116 | £16,186.05 |
| Townhill Community Primary | 44 | £6,139.53 |
| Trallwn Primary | 20 | £2,790.70 |
| Waun Wen Primary | 73 | £10,186.05 |
| Waunarlwydd Primary | 4 | £558.14 |
| Whitstone Primary | 11 | £1,534.88 |
| Ynystawe Primary | 8 | £1,116.28 |
| YGG Y Login Fach | 2 | £279.07 |
| Birchgrove Comp | 10 | £1,395.35 |

Option 3

Funding devolved to all schools based on numbers of EAL learners, stages A – D reception to year 11

| School | Stages A-D (Rec- Y11) | £420,000.00 |
|---------------------------|-----------------------|-------------|
| Birchgrove Primary | 25 | £3,488.37 |
| Bishopston Primary | 2 | £279.07 |
| Blaenymaes Primary | 40 | £5,581.40 |
| Brynhyfryd Primary | 25 | £3,488.37 |
| Brynmill Primary | 118 | £16,465.12 |
| Burlais Primary | 45 | £6,279.07 |
| Cadle Primary | 68 | £9,488.37 |
| Casllwchwr Primary | 2 | £279.07 |
| Christchurch Ch. in Wales | 52 | £7,255.81 |
| Cila Primary | 8 | £1,116.28 |
| Clase Primary | 17 | £2,372.09 |
| Clwyd Community Primary | 41 | £5,720.93 |
| Clydach Primary | 7 | £976.74 |
| Craigfelen Primary | 8 | £1,116.28 |
| Cwm Glas Primary | 13 | £1,813.95 |
| Cwmrhydyceirw Primary | 28 | £3,906.98 |
| Danygraig Primary | 54 | £7,534.88 |
| Dunvant Primary | 19 | £2,651.16 |
| Gendros Primary | 15 | £2,093.02 |
| Glais Primary | 1 | £139.53 |
| Glyncollen Primary | 25 | £3,488.37 |

| | | |
|------------------------|-------------|--------------------|
| Bishop Gore Comp | 207 | £28,883.72 |
| Bishop Vaughan Comp | 175 | £24,418.60 |
| Bishopston Comp | 22 | £3,069.77 |
| Cefn Hengoed Community | 32 | £4,465.12 |
| Dylan Thomas Comp | 50 | £6,976.74 |
| Gowerton Comp | 39 | £5,441.86 |
| Morrison Comp | 25 | £3,488.37 |
| Olchfa Comp | 201 | £28,046.51 |
| Pentrehafod Comp | 125 | £17,441.86 |
| Penyrheol Comp | 13 | £1,813.95 |
| Pontarddulais Comp | 13 | £1,813.95 |
| Total Points | 3010 | £420,000.00 |