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Archwilydd Cyffredinol Cymru  
Auditor General for Wales

# Achieving improvement in support to schools through regional education consortia – an early view



WALES AUDIT OFFICE  
SWYDDFA ARCHWILIO CYMRU



I have prepared and published this report in accordance with the Government of Wales Act 2006 and the Public Audit (Wales) Act 2004.

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# Foreword

This report presents an early view of the progress of the arrangements to achieve school improvement through regional education consortia. I asked for the study on which the report is based to be undertaken at this early stage in the development of the consortia as joint committees or companies because the approach is new and the effectiveness of the arrangements will be essential to the achievement of the improved outcomes for children and young people in Wales.

The intention was to provide assurance of progress and to identify areas where additional work may be required to ensure that the governance and financial arrangements for the system are appropriate. The fieldwork was undertaken jointly with Her Majesty's Inspectorate for Education and Training in Wales (Estyn) who undertook their work for a separate report for the Minister. I am pleased that the report notes that regional consortia have responded well to the feedback received from the fieldwork teams and that some aspects of the findings are already being addressed.

**Huw Vaughan Thomas**  
Auditor General for Wales

# Summary and recommendations



# Summary

- 1 The Welsh Government has adopted a policy of requiring local authorities to work through regional education consortia to improve the efficiency and effectiveness of school improvement arrangements. This is a key element of its response to tackling what it regards as the under-performance of the education system in Wales:
  - a Since 2005, samples of children in Wales (aged 15) have participated in the Organisation for Economic Co-operation and Development (OECD) Progress in International Student Assessment tests (PISA). The PISA tests led to the publication of comparative rankings of the performance of countries. In 2013, the OECD published the 2012 test results, which found that ‘performance in Wales was lower than the rest of the United Kingdom’ and Wales’s ranking against other countries had fallen<sup>1</sup>.
  - b Her Majesty’s Inspectorate for Education and Training in Wales (Estyn) inspects the quality and standards of the education and training services that the 22 local authorities in Wales provide for children and young people. During the 2010-2013 inspection cycle, Estyn assessed overall performance as excellent in only one local authority. Estyn identified more than two-thirds of local authority education services as requiring follow-up monitoring.
- 2 Local authorities have a duty under the **School Standards and Framework Act 1998** to promote high standards in the maintained schools in their area. Local authorities have historically discharged this through school improvement teams of advisers, which visit schools to challenge and support them to improve their performance.
- 3 In February 2011, the then Minister for Education and Skills set out 20 priorities for rapidly transforming standards of achievement in Wales. As part of this announcement, the Minister said that local authorities should work in consortia arrangements to raise standards and achieve efficiencies which should be re-directed to ‘the front-line’<sup>2</sup>. He stated that local authorities would be financially penalised if they did not participate in those arrangements. In March 2011, the Independent Task and Finish Group, commissioned by the Minister and led by Vivian Thomas<sup>3</sup>, reported and said: ‘We conclude that education accountability structures are over complex or simply not clear enough in Wales at this time and that reform is required.’ The 22 local authorities agreed to work through four regional consortia from September 2012.

1 **Achievement of 15-Year-Olds in Wales: PISA 2012 National Report**, National Foundation for Educational Research, December 2013.

2 **Address to Welsh Local Government Association**, Minister for Education and Skills, March 2011.

3 **The Structure of Education Services in Wales**, Independent Task and Finish Group, March 2011.

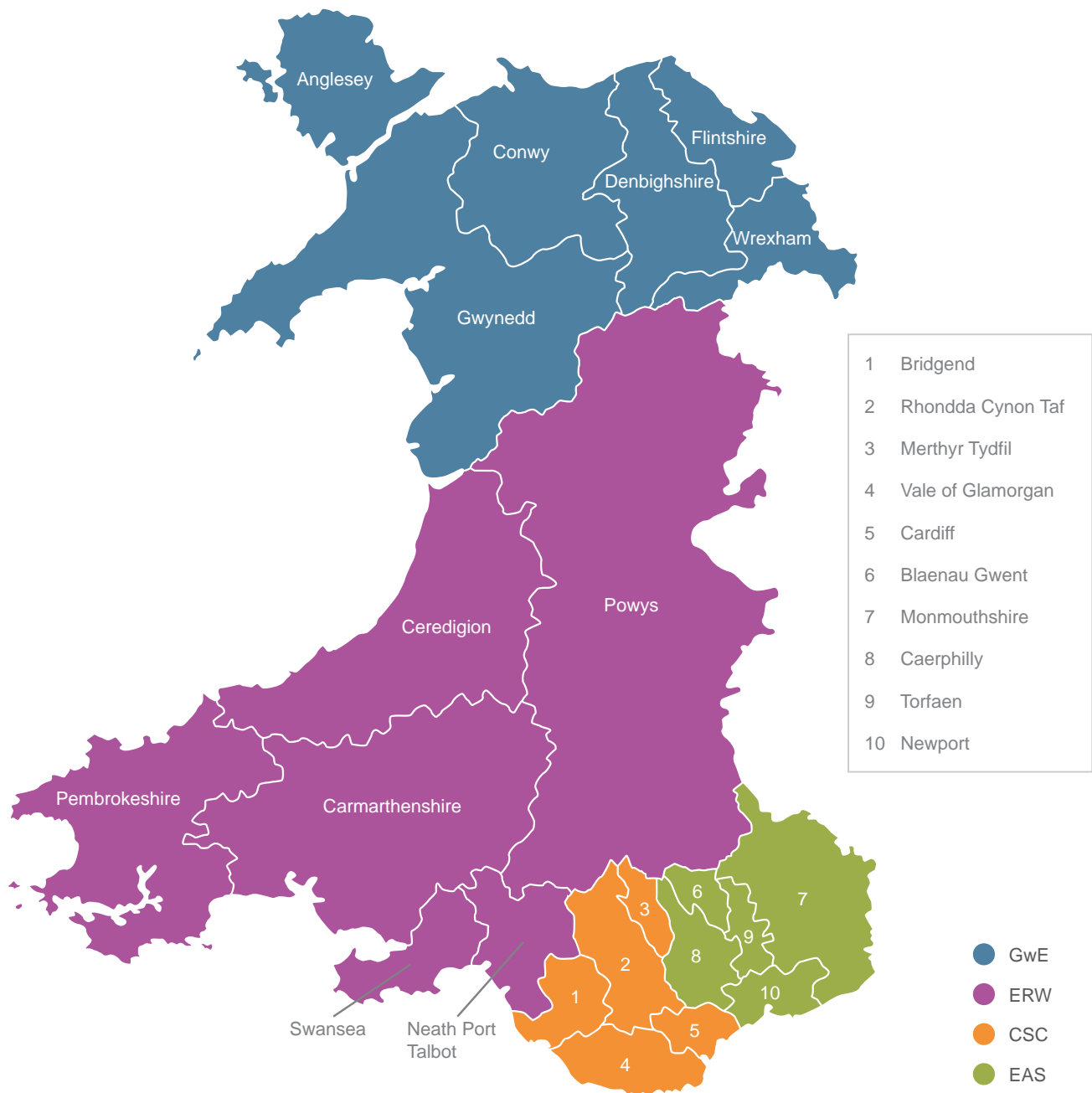
- 4 In June 2013, the Welsh Government published **The Future Delivery of Education Services in Wales**, a review led by Robert Hill<sup>4</sup>. Chapter six of the review tackles the issue of the respective roles and responsibilities of the local authorities, regional consortia and national government. It described these roles as ‘the area where there is the greatest urgency for decisions and action on the options for reform that I have identified’. The report described the arrangements for school improvement in Wales at the time as ‘profoundly unsatisfactory’. It offered a range of options for delivering school improvement services through regional consortia. The Welsh Government consulted on Hill’s review and options from June to September 2013<sup>5</sup>.
- 5 The Welsh Government published a **National Model for Regional Working** in February 2014. The model outlines the vision and arrangements for four, formally constituted, regional consortia as well as the roles of each tier (schools, local authorities, and regional consortia) within the education system. Local authorities agreed to adopt the National Model with implementation progressively achieved from 1 April 2014.
- 6 The local authorities have developed different formal structures for their consortia. Central South Consortium (CSC), Education through Regional Working (ERW) and North Wales School Effectiveness Service/Gwasanaeth Effeithiolrwydd Ysgolion Gogledd Cymru (GwE) are joint committees<sup>6</sup> and Education Achievement Service (EAS) is a company limited by guarantee (further information about the form of the consortia is in [Appendix 3](#)). The four regional consortia cover the local authorities shown in [Figure 1](#).
- 7 Local authorities are expected to protect their funding for school improvement and transfer it to the regional consortia. The National Model calculated that this would result in core funding of £18.55 million in 2014-15.
- 8 School improvement is not a precise term. In the narrowest sense it has been used to refer to the work of some of the advisers who visit schools, challenge schools over their progress and support, and advise them with their plans for improvement. These advisers were known as ‘system leaders’ but the role was re-focussed as part of the development of the National Model to become ‘challenge advisers’. In a wider sense, school improvement also depends on the effectiveness of support for learners with additional needs, work to address attendance and behaviour issues, the quality of teaching and learning, the suitability of school buildings, engagement with parents and communities and much more. The Welsh Government wants the initial focus of regional consortia to be on the challenge and support for schools, although other matters including HR support, school governor training, 14 to 19 support, the foundation phase and some other areas are also expected to be transferred into the consortia.

4 **The Future Delivery of Education Services in Wales**, Robert Hill Consulting, June 2013.

5 **Consultation Document on The Future Delivery of Education Services in Wales**, Welsh Government, June 2013.

6 Sections 101 and 102 of the Local Government Act 1972 (and in the case of Executive Functions sections 19 and 20 of the Local Government Act 2000 and relevant Regulations made under these sections) enable the work of authorities to be discharged through a variety of internal arrangements, and, in this context, external arrangements involving, and working with, other authorities. In particular, these powers include the ability of two or more authorities to discharge any of their functions jointly, and where this occurs, to do so via a joint committee, and/or by their officers.

Figure 1 – The Regional Education Consortia in Wales

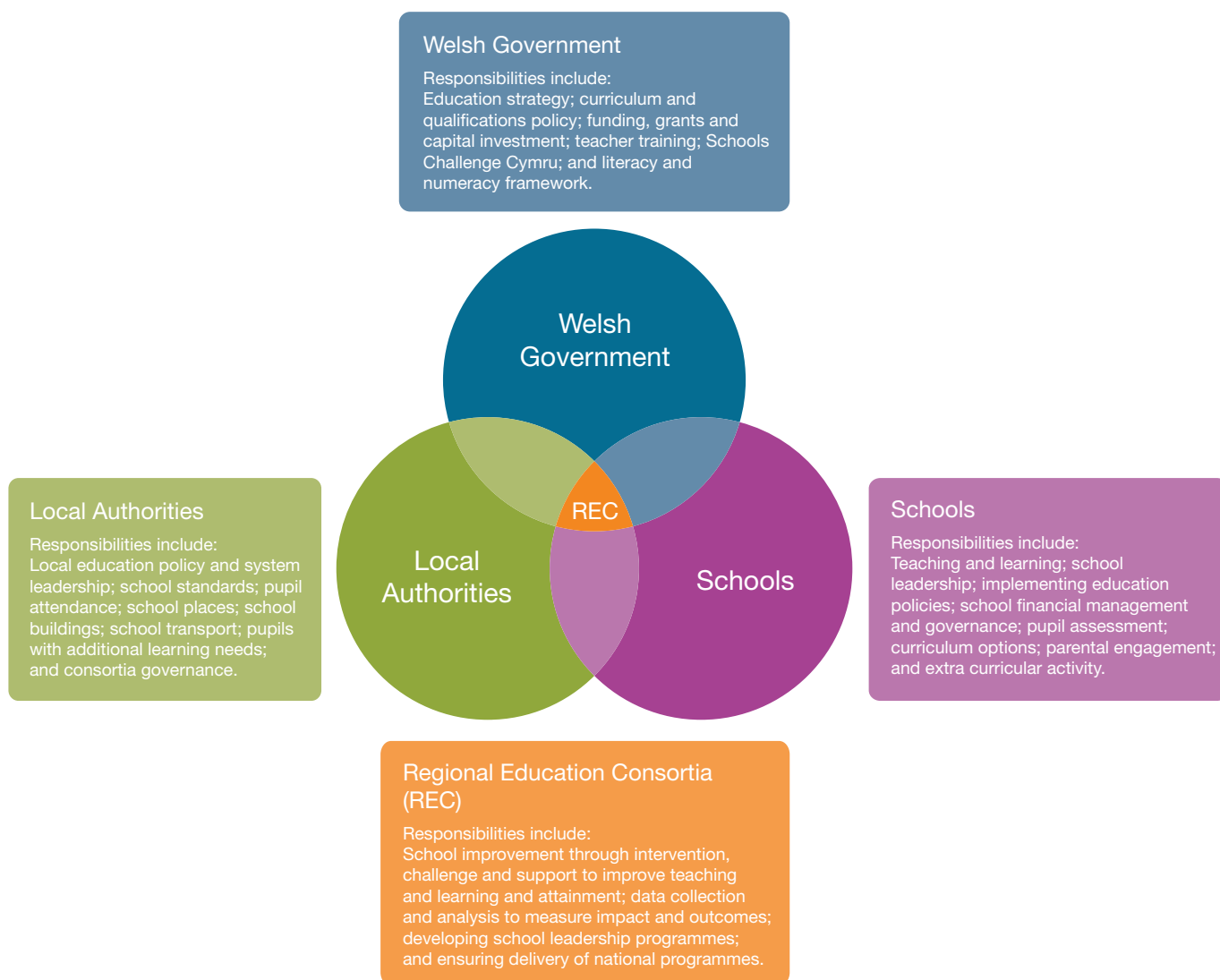


Source: Wales Audit Office



- 9 Achieving improvement in school outcomes is a complex system involving many stakeholders. Key partners, although not the only ones, are the Welsh Government, local authorities, schools, and regional education consortia (Figure 2).

Figure 2 – The School Improvement System showing responsibilities of key partners



Source: Wales Audit Office

- 10 On behalf of the Auditor General, Wales Audit Office staff have examined whether the Welsh Government's arrangements for regional consortia are likely to deliver the intended improvement in support to schools and local authorities. In reviewing the progress of regional consortia, we focused on the effectiveness of governance arrangements based on the Good Governance Standard for Public Services<sup>7</sup>. A summary of the methodology for this report is included as [Appendix 1](#). The main fieldwork for the study was undertaken between August 2014 and January 2015 in collaboration with Estyn which has prepared and published a thematic survey report on the work of regional consortia for school improvement services<sup>8</sup>. By working collaboratively, it has been possible to share and incorporate the insights from the perspectives of both agencies. The Estyn report focuses on the progress on providing improvement services to schools. The main findings and recommendations of the Estyn report are included in [Appendix 2](#).
- 11 We concluded that after an uncertain start, the foundations for regional school improvement services are being established and there are positive signs of progress, but remaining weaknesses are hindering the development of the whole system and the effective governance and financial management of regional consortia. We reached this conclusion because we found:
- a The National Model for Regional Working has provided a broadly agreed framework for a regional approach to school improvement. The Welsh Government, local authorities and regional consortia have shown a commitment to this approach and there are some positive signs of progress in the challenge provided to schools.
  - b However, we found some continuing uncertainties about the nature and scope of consortia, and that some relationships between partners did not reflect the need for all the main partners to collaborate to achieve improvement together. There has also been a lack of medium-term planning and insufficient focus on arrangements to assess value for money.
  - c The governance of regional consortia is developing but we found progress was hindered by limited capacity, incomplete management structures, inadequate scrutiny of overall consortia arrangements, weaknesses in financial and performance management and insufficient openness and transparency.
- 12 Feedback on the progress of the study was provided to the Welsh Government at various stages and to each regional consortium at the end of fieldwork by the Wales Audit Office and Estyn fieldwork teams. This has enabled issues identified to be considered as quickly as possible.

<sup>7</sup> [The Good Governance Standard for Public Services](#), The Independent Commission on Governance Standards in Public Services and the Chartered Institute of Public Finance and Accountancy, January 2005.

<sup>8</sup> [Improving schools through regional education consortia](#), Estyn, June 2015.

# Recommendations

- 13 Arising from the study, the recommendations below are made. In addition, the report to the Minister by Estyn, for which fieldwork was carried out in collaboration with Wales Audit Office staff, includes recommendations to the Welsh Government, local authorities and regional consortia. These are included with the main findings of the Estyn report in [Appendix 2](#).

## Recommendation

### **R1 To clarify the nature and operation of consortia**

We found there to be continuing uncertainty about some aspects of the nature of regional consortia and their present and future scope ([paragraphs 2.2 to 2.20](#)). We therefore recommend:

- The Welsh Government should take full account of the statutory responsibilities of local authorities, and take appropriate legal advice, when considering changes to the roles it expects of local authorities and the regional consortia.
- The Welsh Government should update the National Model to be less prescriptive on the structure under joint committees or boards whilst maintaining a focus on outcomes.
- The Welsh Government and local authorities should develop and agree a consistent approach to the role of regional consortia and the Welsh Government in school improvement interventions so that all parties are clear what they should be involved in and responsible for.
- Local authorities should clarify whether consortia services are jointly provided or are commissioned services (services provided under joint-committee arrangements are jointly provided services and are not commissioned services).

### **R2 To focus on outcomes through medium-term planning**

We found that the development of effective regional consortia was hindered by a focus on short-term actions and uncertainty about the future of consortia ([paragraphs 2.33 to 2.36; 3.16 to 3.17](#)). We therefore recommend:

- As any possible local authority re-organisation will not be fully implemented until 2020, the Welsh Government and regional consortia should develop three-year plans for the further development, scope, and funding of regional consortia linked to appropriate strategic objectives.

## Recommendation

### **R3 To develop more collaborative relationships for the school improvement system**

The development of the National Model for Regional Working involved many school improvement partners but we found that this had not led to the development of sufficiently collaborative relationships ([paragraphs 2.25 to 2.32](#)). We therefore recommend:

- The Welsh Government should develop the present ‘Review and Challenge’ approach (where the Welsh Government hold regional consortia to account) to establish a more collaborative but robust comprehensive ‘system review’ approach in which all partners in the system share progress, challenges and issues openly.
- Regional consortia should develop improved arrangements for sharing practice and supporting efficiency (for example, one consortium could take the lead on tackling an issue or have functional responsibility for the development of a policy).
- The Welsh Government, local authorities and regional consortia should recognise the interdependency of all partners fulfilling their school improvement roles and agree an approach to:
  - information sharing and consultation about developments related to school improvement;
  - developing collaborative relationships of shared accountability; and
  - undertaking system wide reviews, and an alignment of the understanding and position of regional consortia across all Welsh Government relevant strategies.

### **R4 To build effective leadership and attract top talent**

Regional consortia, local authorities and the Welsh Government have all found difficulties in recruiting to senior leadership for education and we found there had been limited action to address this ([paragraphs 2.37 to 2.40](#)). We therefore recommend:

- The Welsh Government should work with local authority leaders to improve capacity and capability in the system to support strategic development and effective governance.
- The Welsh Government and local authorities should collaborate to improve the attractiveness of education leadership roles to attract the most talented leaders for the school improvement system.
- Local authorities should collaborate to support the professional development of senior leaders and to ensure appropriate performance management arrangements are in place for senior leaders.

## Recommendation

### **R5 To improve the effectiveness of governance and management of regional consortia**

Whilst continuing progress is being made, we found that regional consortia have not yet developed fully effective governance and financial management arrangements (paragraphs 3.2 to 3.36). We therefore recommend that local authorities and their regional consortia should:

- improve their use of self-evaluation of their performance and governance arrangements and use this to support business planning and their annual reviews of governance to inform their annual governance statements;
- improve performance management including better business planning, use of clear and measurable performance measures, and the assessment of value for money;
- make strategic risk management an integral part of their management arrangements and report regularly at joint committee or board level;
- develop their financial management arrangements to ensure that budgeting, financial monitoring and reporting cover all relevant income and expenditure, including grants funding spent through local authorities;
- develop joint scrutiny arrangements of the overall consortia as well as scrutiny of performance by individual authorities, which may involve establishment of a joint scrutiny committee or co-ordinated work by local authority scrutiny committees;
- ensure the openness and transparency of consortia decision making and arrangements;
- recognise and address any potential conflicts of interest; and where staff have more than one employer, regional consortia should ensure lines of accountability are clear and all staff are aware of the roles undertaken; and
- develop robust communications strategies for engagement with all key stakeholders.

## Part 1

After a period of uncertainty, the foundations of the school improvement system are becoming established and there are positive signs of progress for some regional school improvement services



- 1.1 This section highlights some of the areas of progress in the development of regional consortia and the school improvement system.

## Prior to publication of the National Model for Regional Working, significant differences had developed in the scope, approach and arrangements for regional school improvement services

- 1.2 The Association of Directors of Education in Wales (ADEW)<sup>9</sup> began to work through five regional consortia<sup>10</sup> in the year 2000 to develop common approaches to national performance management requirements for teachers. These long-standing collaboration arrangements also linked to various networks of local authority officers. The ADEW networks of directors subsequently re-grouped into four regions and developed into forums for regional collaboration on a range of education issues. The directors of education are the officers who are accountable to their local authorities for the statutory education functions of the authorities (Exhibit 1).
- 1.3 The structures for the management of education services vary between local authorities. For example, in some authorities education is part of a children and young people's department along with social services for children, whilst in others it has remained separate. Prior to the establishment of regional consortia, the scope and organisation of school improvement services varied with some significant variations in the funding and staffing levels of the services. The quality of school improvement services also varied; over the Estyn 2010-2013 inspection cycle, support for school improvement was assessed by Estyn as excellent in two authorities, good in five, adequate in 10 and unsatisfactory in five authorities.
- 1.4 When the Minister for Education and Skills announced, in February 2011, that he expected local authorities to deliver school improvement services through regional consortia it was the ADEW networks that undertook preparatory work to develop the regional approach. For instance, in North Wales, the ADEW network undertook the development of the business case for a regional school improvement service and developed the inter-authority service level agreement for a joint service that was agreed by their local authorities.
- 1.5 From 2011 to 2013, each region developed its own plans for regional collaborative school improvement services with different governance structures and different ranges of service included. In south-east Wales, the local authorities decided to establish their Education Achievement Service (EAS) as a company limited by guarantee. In central south Wales, the local authorities established the Central South Consortium (CSC) as a formal joint committee to operate with two distinct services areas, a Joint Education Service and a 'LINKS' service to provide support to schools. The North Wales grouping of local authorities and the mid and west Wales grouping have remained consistent, but elsewhere there were changes in the groupings with Caerphilly joining the south-east Wales region and Cardiff joining the Central South region.

<sup>9</sup> The Association of Directors of Education in Wales (ADEW) is the professional group of local authority officers accountable for statutory education functions in each of the local authorities in Wales.

<sup>10</sup> The ADEW consortia are referred to in this report as ADEW networks to distinguish them from the more formal consortia governed by a joint committee or company board.

## Exhibit 1 – The statutory framework for the school improvement system

The **Education Act 1944** placed a duty on local authorities to offer universal free education. This duty was consolidated in the **Education Act 1996**, which requires local authorities to provide ‘sufficient schools in ‘number, character and equipment’” to offer education appropriate to age, ability and aptitude of pupils. The 1996 Act also placed a duty on local authorities to promote improved standards in schools and to appoint a fit person to be the chief education officer of the authority.

The **School Standards and Framework Act 1998** expanded on the 1996 Act and added the duty of local authorities ‘to promote high standards in primary and secondary schools’. The **Local Government (Wales) Measure 2009** placed a duty on local authorities to ‘make arrangement to secure continuous improvement’.

The statutory duties of schools are set out in a range of legislation including the **Education Act 2002**, which says, ‘the governing body shall conduct the school with a view to promoting high standards of educational achievement at the school’. The **Education (School Development Plans) (Wales) Regulations 2014** require schools to prepare three-year development plans showing their improvement priorities.

The **Government of Wales Act 1998** transferred the education and training functions from the UK government to the devolved assembly and subsequently to the Welsh Ministers by the **Government of Wales Act 2006**.

The **School Standards and Organisation (Wales) Act 2013** reformed the powers of local authorities and the Welsh Ministers to intervene in the conduct of schools maintained by local authorities that are causing concern. This Act also reformed the powers of Welsh Ministers to issue formal guidance, give direction and intervene in the exercise of education functions.

The **Local Government Acts of 1972** and **2000** enable two or more local authorities to discharge their work jointly in various ways via a joint committee and/or their officers. Section 111 of the 1972 Act gives a permissive power to establish a company (although not a trading company).

There is no legislation conferring any education duties on regional consortia.

Any role for regional consortia derives only from agreements made by the participating authorities to discharge their duties jointly through a consortium. However, in doing so, local authorities do not resile from the statutory duties conferred on them by current relevant legislation.



## Whilst not addressing all issues, the National Model for Regional Working gave a broadly agreed scope and framework for a regional approach to school improvement

- 1.6 The report by Robert Hill in June 2013 made a series of recommendations about school improvement services. The Welsh Government decided that they could not consider a number of the recommendations in full until Welsh Government officials had made decisions in relation to the Commission on Public Service Governance (the Williams Commission), which reported in January 2014. However, Welsh Government officials considered two recommendations were sufficiently important to take immediate action in September 2013. The recommendations were:
- a local authorities to stop providing school improvement services; and
  - b to fund regional consortia directly by top-slicing the Revenue Support Grant.
- 1.7 Local authorities were opposed to these changes because local authorities retain statutory duties for school improvement and to top-slice funding would mean local authorities have statutory duties but do not control the related funding. In October 2013, following discussions with the Welsh Local Government Association (WLGA), the Minister for Education and Skills issued a written statement<sup>11</sup> outlining agreement with local government that would protect school improvement funding within the local government budget settlement whilst local government committed to develop greater consistency and uniformity across consortia business models. He also stated that work had begun to construct a National Model for Regional Working for the consortia.
- 1.8 The WLGA, the Welsh Government, an advisory panel of experts, and representatives from regional consortia, local authorities and headteachers worked together to co-construct the National Model for Regional Working for implementation from 1 April 2014. The Welsh Government published the final model on 17 February 2014. In a written statement<sup>12</sup>, the Minister for Education and Skills stated:
- ‘Local government have given a commitment to adopt the national model with implementation progressively achieved from 1 April 2014. This is along with a ‘protection’ on the current level of spend to support regional school services. I have a commitment from them that if they fail to deliver then there will be a top-slice of the Revenue Support Grant from 2015.’
- 1.9 The National Model set out the vision and principles for the change and covered:
- a the scope of consortia work;
  - b responsibilities of consortia and local authorities;
  - c governance arrangements;
  - d accountability and relationships;

11 **Written Statement – The Review of the Future Delivery of Education Services in Wales: An Update**, Minister for Education and Skills, October 2013.

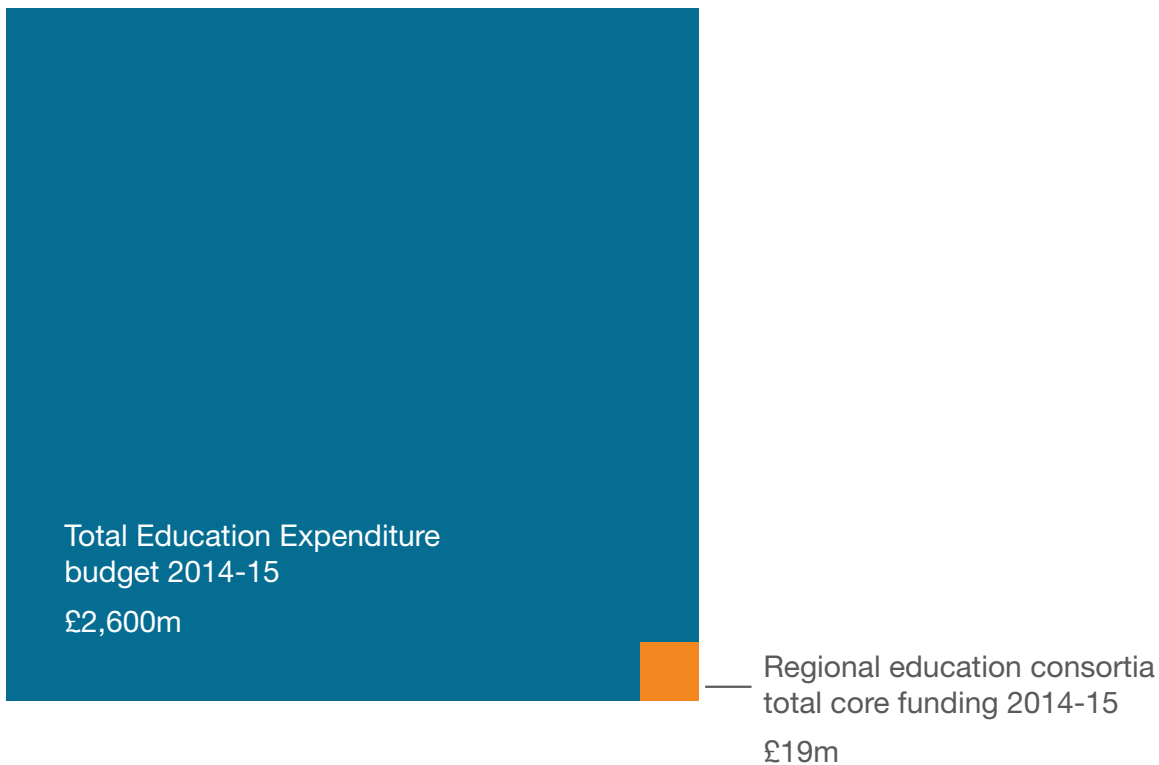
12 **Written Statement – The National Model for Regional Working**, Minister for Education and Skills, February 2014.

- e the organisation of consortia;
- f funding and finances; and
- g timescales.

1.10 The co-production of the National Model for Regional Working provided a measure of ‘buy-in’ for the framework and the WLGA gave a commitment that local authorities would adopt the model progressively from April 2014. We found consistent support for the principal elements of the National Model framework amongst those we spoke to in the Welsh Government, regional consortia, and local authorities.

1.11 The National Model provided a basis for establishing the core funding provided by local authorities for each consortium. The total core funding for 2014-15 was calculated from elements of the Welsh Government Revenue Support Grant as £18.5 million. To put this funding in context, the total budgeted revenue expenditure by local authorities on education for 2014-15 was £2,630 million and the element of this they are expected to provide for consortia is about 0.7 per cent (Figure 3).

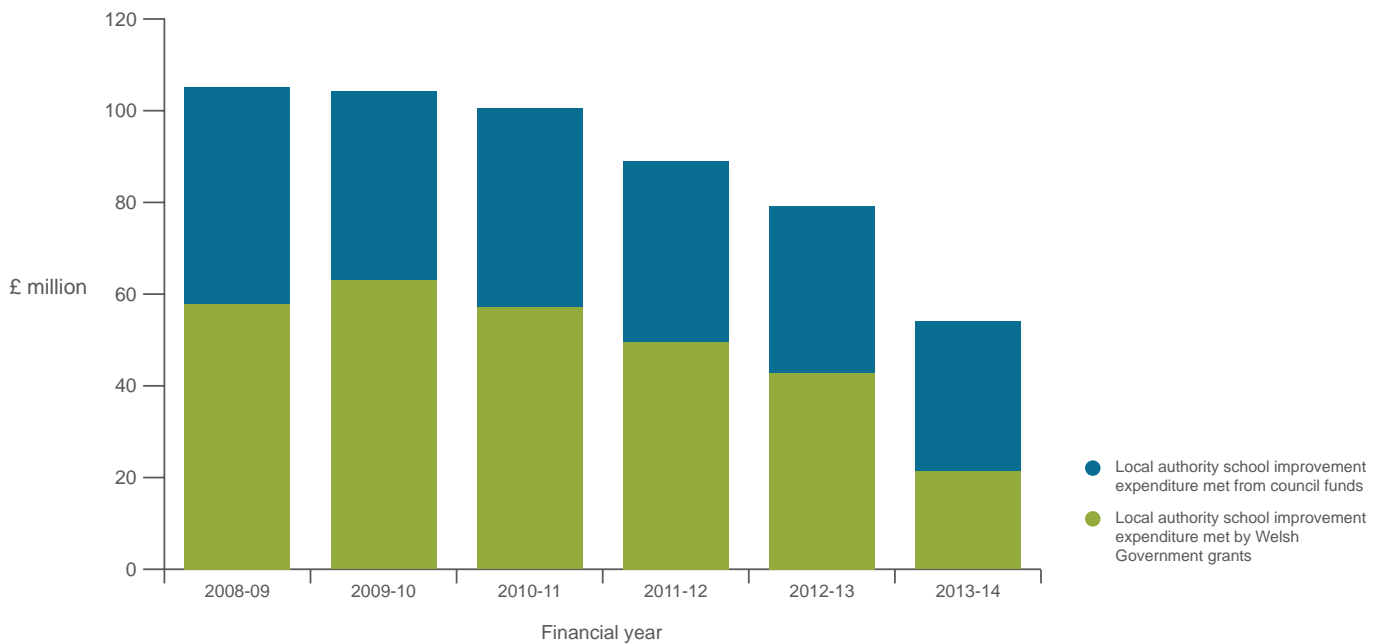
Figure 3 – In 2014-15, budgeted core funding for regional consortia was less than one per cent of local authority expenditure on education



Source: Welsh Government

1.12 As well as the core funding for consortia, local authorities report additional expenditure on ‘school improvement’ using other funding streams such as Welsh Government grants. During the five years to 2013-14, local authorities reported a reduction in their overall net expenditure on ‘school improvement’ of 49 per cent from £105 million in 2008-09 to £54 million in 2013-14 (Figure 4). During this period the level of delegation of funding to schools increased in all local authorities and the Welsh Government provided additional grant funding for schools, for example, through the Pupil Deprivation Grant, that is not included in the local authority school improvement expenditure figures.

Figure 4 – Between 2008-09 and 2013-14 local authorities reported that their net expenditure on school improvement reduced by almost 50 per cent



Source: Welsh Government

- 1.13 The regional consortia are also expected to have a role in some of the streams of grant expenditure from the Welsh Government, including some elements of School Effectiveness Grant, Pupil Deprivation Grant, Foundation Phase Grant and other grants. The Welsh Government can distribute these to regional consortia (through their lead local authority), local authorities or schools depending on the grant and the region. The Welsh Government reported that the grants related to school improvement totalled just over £250 million in 2014-15 (Figure 5).
- 1.14 The National Model set out an agreed structure for consortia. Each consortium was expected to adopt either a governance structure based on a joint committee or a company limited by guarantee. The National Model set out the expected role, responsibilities and membership of the joint committee, and an executive board and described the expected roles of the managing director, lead chief executive, and lead director of education. The Model provided a template for the developing consortia to work towards.
- 1.15 The National Model set out evidence-based approaches to school improvement. The approaches included an annual cycle of school improvement, the importance of school-to-school support, self-evaluation by schools, effective support and challenge from 'challenge advisers' and the development of a national system of school categorisation. These approaches draw on recognised good practice and were not challenged by stakeholders.

### The National Model aimed to establish the consortia arrangements by April 2014 but all consortia experienced transition difficulties whilst moving to the new framework

- 1.16 The National Model says 'the aim in order to begin to deliver improved outcomes is to transition through the next few months to the consortia arrangements set out in this report by 1st April 2014'. However, the Model recognised that some of the school improvement services would not be delivered by that date. We found that the Welsh Government and some consortia and local authorities underestimated the complexity of the change to formal consortia and the time required to implement the changes. All the regional consortia experienced transition difficulties.
- 1.17 The use of formal joint committee or company board arrangements to lead the development of school improvement services is innovative and we have not found any comparative examples. Such structures were not part of the City Challenge school improvement programmes in London, Manchester or the Black Country<sup>13</sup>. The use of a joint committee for managing services with large staff groups, stakeholders and uncertainty is very different from the joint committees in Wales that have managed the development of shared capital projects or overseen some regional transport arrangements. Whilst the Independent Task and Finish Group, led by Vivian Thomas, criticised the complexity of education structures<sup>14</sup>, the chosen framework for regional education consortia was likely to add to the complexities of structure and accountability.

<sup>13</sup> City Challenge was a UK Government programme run from 2008 to 2011 designed to improve educational outcomes in London, Manchester and the Black Country. The interventions used were characterised by a belief that school-to-school collaboration has a central role to play in school improvement; recognition of the importance of school leadership; and a data-rich approach to tackling issues and sharing learning.

<sup>14</sup> **The Structure of Education Services in Wales**, Independent Task and Finish Group, March 2011.

Figure 5 – The Welsh Government issued grants of over £250 million in 2014-15 relating to school improvement

Welsh Government grant description	Welsh Government funding 2014-15 (£ million)
<b>Grants related to school improvement being rationalised in 2015-16<sup>1</sup></b>	
Foundation Phase Revenue Grant	97.9
School Effectiveness Grant	28.1
14 - 19 Learning Pathways	10.2
Minority Ethnic Achievement Grant	10.0
Welsh in Education Grant	5.6
Gypsy Children and Traveller Children Education Grant	1.1
Lead and Emerging Practitioner Grant	0.9
Reading and Numeracy Test Support Grant	0.8
Additional funding for Band 4 and 5 Schools	0.5
Induction	0.4
Higher Level Teaching Assistant Grant	0.2
<b>Sub-total of grants to be rationalised</b>	<b>155.8</b>
<b>Other grants related to school improvement</b>	
Pupil Deprivation Grant	68.5
Schools Challenge Cymru <sup>2</sup>	20.0
GCSE support programme for Welsh/English and Mathematics	2.8
Youth Work Strategy Support	2.8
Family Learning Programme	1.8
Learning in a Digital Wales CPD	0.3
Policy Observatory Project	0.1
<b>Sub-total of other grants</b>	<b>96.1</b>
<b>Total Welsh Government grant funding related to school improvement</b>	<b>251.9</b>

Notes:

1 The Welsh Government is amalgamating 11 grants into a new 'Education Improvement Grant for Schools' in 2015-16. The total funding will be £141 million in 2015-16.

2 Schools Challenge Cymru funding is up to £20 million in 2014-15.

Source: Welsh Government

- 1.18 Each local authority provided different levels and structures for school improvement services and bringing these together was, not surprisingly, a complex task. As noted in [paragraph 1.12](#), local authorities had also been reducing their expenditure and making savings in their school improvement services. In many cases, this had involved some level of restructuring of the advisers to schools.
- 1.19 In some regions the transfer of staff to regional school improvement services began in 2012. The Transfer of Undertakings Protection of Employment (TUPE) regulations applied where staff were to be transferred to a new local authority. These regulations placed some limitations on the ability of the consortia to choose the staff they wished to have transferred in to a consortium. Most of the consortia have had at least one round of further reorganisation since establishing their initial staff complements to implement the change from system leader to challenge adviser and to develop the structures of the consortia.
- 1.20 The National Model clarified the expectation that consortia would develop joint committees or company boards and these were in place in CSC and EAS in 2012, GwE in 2013, and ERW in 2014. The committees or boards were then able to provide the necessary decision making and leadership. However, developing such bodies, drawn from across very different local authorities, into fully effective committees or boards is inevitably a longer process than bringing them into existence.
- 1.21 All the consortia struggled to complete their leadership teams and had vacancies or interim appointments during 2012 to 2014. During this transition period, the consortia have depended heavily on the involvement of the directors of education and particularly the lead director for each consortium. We found that all the lead directors provide good support and guidance to the managing directors of the consortium. The managing directors all now have a clear vision for the service they are seeking to develop, although in two regions this was not entirely shared by the directors of education and other local authority leaders.

## **The Welsh Government and local authorities have demonstrated their commitment to supporting school improvement through regional working and this has helped development**

- 1.22 The Welsh Government, local authorities and independent reviews have drawn attention to the need to significantly improve pupil attainment in Wales. The challenge to local authorities to develop regional work to deliver more effective and efficient school improvement services has had strong leadership from Ministers. This leadership was backed up with: a fund of £1 million per consortium in 2012 to support transition; the secondment into the Department for Education and Skills of a group of initially four people with proven educational leadership roles to provide a link with, and to support, the four emerging consortia; and an increase in funding through specific grants to support school improvement related activities.

- 1.23 The Welsh Government has supported the drive to improve consistency in the challenge and support to schools by providing national training programmes for challenge advisers. The Minister and senior officials have developed and delivered termly 'review and challenge' events to monitor progress of consortia as well as a range of ongoing contacts. The development of the national system of schools categorisation and guidance related to this has also helped consortia improve the consistency of approach to schools.
- 1.24 Local authorities, through the WLGA and ADEW network representatives, engaged in the co-production of the National Model and made a commitment to work towards the model. We found that local authorities and regional consortia generally welcomed the Welsh Government commitment to supporting the development of consortia. We found that in each region, elected members and officers showed commitment to regional working and recognised some of the inherent issues in transition. For example, they generally accepted that there would be 'winners and losers' in the financial arrangements and were prepared to share local authority staff resources and work collaboratively to help develop the consortia.
- 1.25 This level of commitment to regional working provides an important foundation and will help the processes to withstand further pressures in the coming years when greater tensions over funding may be expected. Although we found some inconsistencies in the effectiveness of engagement there was generally a positive spirit and commitment to regional working.
- 1.26 Over the last year, we observed progress, momentum and developments across the system, including: the publication of Qualified for Life – a Welsh Government education strategy to 2020; a series of Ministerial speeches aimed at ensuring a coherent message about Government priorities; and developments in the governance and service delivery of regional consortia. The managers and leaders of the regional consortia were all working hard to develop the fledgling organisations. The teams from the Wales Audit Office and Estyn provided verbal feedback to each consortium following fieldwork. Without exception, the feedback was accepted and in many cases, the consortia have quickly acted upon identified issues.

## There are some signs of progress in the challenge and support of schools although many weaknesses remain to be addressed

- 1.27 The National Model for Regional Working notes that the delivery of school improvement services should be 'underpinned by excellence of expertise in analysing and challenging schools' improvement needs' and the Welsh Government reiterated the role of regional consortia in **Qualified for Life** as follows:  
'The role of regional consortia in the National Model is to deliver intervention and challenge. This challenge is essential to ensure that schools set ambitious and stretching targets for learner attainment.'

- 1.28 The report **Improving schools through regional education consortia** by Estyn identifies some signs of progress in the challenge to schools although many significant weaknesses remain. The main findings by Estyn are included in [Appendix 2](#) but some of the relevant points are:
- a Although the general improvements in standards of pupil attainment over the past three years cannot be solely attributed to the development of regional consortia, the published data reflects a gradual improvement in pupil attainment across all four regions. At key stage 2 pupils attain at similar levels across all regions but at key stage 4 there is greater variation in levels of pupil outcomes. Performance is consistently higher in GWE and ERW than in CSC and EAS, the latter two regions having comparatively greater levels of social deprivation. School inspection outcomes are broadly similar across the four regions.
  - b The regional consortia have strengthened their quality assurance arrangements for challenge advisers, particularly since September 2014, and there is greater consistency in the work of challenge advisers as a result. However, the arrangements are not always implemented rigorously enough and pre-inspection reports for schools still do not always match the outcome of inspections closely enough.
  - c None of the regional consortia has a coherent strategic approach to reduce the impact of deprivation on attainment. The regional consortia have not monitored closely enough how well schools are using the Pupil Deprivation Grant.
  - d All the consortia have suitable arrangements in place with local authorities for sharing useful information from many service areas relevant to their work, such as additional learning needs, social inclusion and wellbeing, finance and complaints. However, none of the consortia has a fully developed and consistently used system to collate, analyse and share information about the progress of pupils and schools.
  - e Regional consortia generally know how well many of their schools are currently performing through the work of challenge advisers, supported by their analysis of attainment data. Most headteachers and chairs of governing bodies report that the performance of their school is scrutinised closely and fairly by challenge advisers.
  - f Although challenge advisers generally know what assessment data indicates about a school's performance, this does not always mean that they know the school well enough. Challenge advisers are not always diagnostic enough in understanding why a school is performing well or not. Challenge advisers are not always involved enough in moderating teacher assessment and they are less effective at evaluating teaching and leadership than standards. However, weaknesses in challenge adviser work are not as prevalent as they were when consortia began to formalise in 2012. Regional consortia usually provide appropriate and timely information to local authorities about schools causing concern.



- g Overall, regional consortia are better at challenging schools about their current performance than supporting them to improve. All the consortia have an appropriately strong focus on supporting improvement in literacy and numeracy. However, support for schools in many other areas of learning, such as non-core subjects, is either weak, inconsistent or unavailable. The consortia are developing strategies to facilitate schools to support each other, although only CSC involves all schools in their strategy. The consortia do not monitor and evaluate well enough the impact of their support to improve schools, whether this support is provided directly or brokered or is school-to-school support that they facilitate.

## Part 2

While the foundations are being established, remaining weaknesses are hindering the pace of development of a fully effective school improvement system across Wales



- 2.1 This section highlights some aspects of the school improvement system which are not yet fully effective.

## Failure to adequately reflect a full and consistent understanding of the statutory education role of local authorities has hampered the development of effective governance and accountability arrangements

The arrangements proposed in the published National Model and subsequent version do not consistently reflect the statutory framework for school improvement

- 2.2 The National Model recognises that 'local authorities will retain the statutory accountability for school performance'. The Welsh Government published the Model following prolonged discussion with the WLGA and other advisers (paragraph 1.8), but it lacked sufficient appreciation of the statutory responsibility of local government for school improvement (Exhibit 1). Despite the innovative nature of the proposed arrangements, the Welsh Government failed to obtain sufficient legal advice on the model. Following publication, the WLGA obtained legal advice and shared it with the Welsh Government. This led to the circulation of an unpublished addendum, which revised the consortia executive board to an advisory board. However, the position of directors of education, portfolio holders and Chief Executives was not well covered in the National Model either. Most consortia have had difficulty working out these roles.
- 2.3 The unpublished revised version of the National Model retains several responsibilities for the renamed advisory board that may be inappropriate. These responsibilities include: determining the organisational arrangements for the consortia; and the role to oversee and support and challenge the strategy, business planning, budget, performance, risk management and senior appointments for the consortia. The National Model also says that the line management and accountability of the managing director should be to the chair of the advisory board.
- 2.4 The National Model prescribes the expected membership of advisory boards, which should include up to five members from a panel approved by the WLGA and the Welsh Government, at least one of whom is a serving local headteacher. The Welsh Government had not considered the full implications of the change from having an executive board to an advisory board. Nor had they considered the range of options available to a joint committee or company board which has the legal responsibility to determine its own sub-committees and delegation arrangements<sup>15</sup>. The resulting lack of clarity had added to the difficulty consortia have had in establishing these arrangements and contributed to delays in the establishment of appropriate structures of the consortia. Some of the weaknesses have still not been fully addressed and an appropriately revised National Model had not been published by the end of March 2015.

<sup>15</sup> Sections 101 and 102 of the Local Government Act 1972.

- 2.5 We found that consortia were actively seeking to develop appropriate governance arrangements but felt constrained by the requirements of the National Model. One consortium, EAS, with agreement from the Welsh Government, has recently decided not to have an advisory board as set out in the National Model. Instead, they will appoint some of the expected members of an advisory board as non-executive directors to the company board and recognise the 'Joint Executive Group' (consisting of directors of education and cabinet lead members) as the co-ordinating group for commissioning and monitoring EAS but sitting outside the EAS structure. GwE has decided to recognise its ADEW network of directors of education as its management board, although it had not fully developed the terms of reference and arrangements by the end of January 2015.
- 2.6 There is a requirement in the National Model for the Welsh Government to 'sign off' consortia business plans. However, this provision gives insufficient weight to the statutory position, which is that the joint committees, or company boards, should determine their own business plans, whilst the Welsh Government may wish to comment on them.
- 2.7 The failure to fully appreciate the legal implications of regional working through consortia led to the failure to recognise that data sharing by the Welsh Government to consortia would be problematic and would need to be addressed.
- 2.8 The faith schools sector was not adequately represented in the discussion on the development of the National Model. Diocesan directors of education were not involved or consulted on the development of the National Model or on initiatives such as School Challenge Cymru despite their significant and formal role in education in Wales.

**We found that some confusion about whether regional consortia were commissioned by local authorities or jointly provided services on behalf of local authorities contributed to inconsistencies over roles and responsibilities**

- 2.9 Behind some of the difficulty that consortia and local authorities experienced in establishing appropriate governance was inconsistency about the nature of consortia. Some Welsh Government officials, consortia staff and local authority directors and councillors see the regional consortia as separate entities being commissioned by local authorities to deliver school improvement services, whilst others see consortia as the mechanism for collaboration between local authorities to jointly provide services. We found these different views contributed to confusion within the consortia over who was managing, overseeing and making decisions for the consortia; and who was responsible for monitoring, challenging and scrutinising the work of the consortia.
- 2.10 The Welsh Government's 2014 policy document, **Qualified for Life**, sets out the strategic objectives for education for 3 to 19-year-olds in Wales to 2020. The policy says 'the role of local authorities in the National Model is clear – as the democratically accountable body they are crucial as the conscience of the system, but the National Model is also clear about their role as commissioners not

providers'. This reflects the idea that consortia are separate from local authorities but since the voting members of the joint committee or company board are solely composed of representatives of the local authorities this misrepresents the position.

- 2.11 The consortia with joint committees (CSC, ERW and GwE) are clearly not commissioned by local authorities, but they are the means by which the authorities deliver a shared service. The consortium using a company, EAS, is closer to a commissioned service to the extent that the company is a separate legal entity, albeit wholly owned by the local authorities, and the company board directors are not the cabinet members with responsibility for education.
- 2.12 The consequence of this understanding is that for the joint committee consortia, those with statutory responsibilities are not separate from the consortia but part of the leadership and management of the service. For the quasi-commissioning position of EAS, the lead cabinet member and director can be more appropriately seen as outside the management and leadership of the consortia and have the role of leading the 'commissioning' for their authorities individually and collectively. The National Model says that local authorities should 'designate a lead officer ('an intelligent client') as the main point of contact with the regional consortium' but this is an insufficient description of the required roles.

## The Welsh Government and regional consortia have not yet established a consistent approach to their scope, arrangements or role

The significant differences between the organisation of regional consortia largely reflect geographical, language, educational and performance differences and are not the main reason for differences in the pace of change

- 2.13 The four consortia have developed differently (Appendix 3). The two geographically more compact regions, CSC and EAS, have less emphasis on the use of 'hub' arrangements of pairs of authorities, whilst the two geographically spread regions, ERW and GwE, find this arrangement more important. The hub arrangement also helps recognise the variation in the predominant use of the Welsh language, which is easier to accommodate within hub arrangements than through operating across the whole region.
- 2.14 In the south and south-east, a greater proportion of local education authorities have been regarded as not operating well and were placed in 'special measures' or 'follow-up' categories following inspections by Estyn. In these regions, there has been a quicker commitment to delivery through regional consortia and the consortia having a broader scope. For example, EAS has developed the largest brokerage and support service of additional products and support, and CSC has channelled most grant expenditure through the consortium. In the Mid and West and North Wales regions some of the local authorities had more effective services and were understandably more reluctant to transfer services to new arrangements, which were untested and lacking in capacity and capability.

- 2.15 We found that whilst the reservations were understandable, and it is appropriate for all regions to undertake robust business case appraisals to inform any changes to service delivery, the consortia could do more to build their capacity to undertake such work and increase the pace of change.
- 2.16 Whilst there are differences in the structures of the four consortia, our assessment was that the structural arrangements were not the primary cause of differences in the pace of change.

### The Welsh Government has been inconsistent in its engagement of consortia in some initiatives to support school improvement services

- 2.17 The implication of the agreement on the National Model was that the Welsh Government expected regional consortia to lead the delivery of improvement services to schools. However, the Welsh Government's decision to launch the Schools Challenge Cymru initiative in February 2014 to boost the performance of up to 40 of Wales' underperforming secondary schools, had limited involvement of local authorities or consortia prior to the announcement of the initiative. Many directors of education and consortia leaders saw this as confusing and undermining the approach in the National Model.
- 2.18 The appointment of a specific group of challenge advisers, the financial and communications arrangements with consortia and the role of consortia in relation to the named schools for Schools Challenge Cymru were issues that had to be worked out following the initial announcement of the programme. Whilst the desire of the Welsh Government to take decisive action to drive change was understandable, we found that many local authority and consortia officers felt that the way in which the initiative was initially launched could have involved consortia in a more effective way. We found that regional consortia and local authorities were also concerned about other instances where they perceived that the Welsh Government had not consulted adequately about how national initiatives would link with consortia work, for example, the National Support Programme for literacy and numeracy<sup>16</sup>.

### The expected scope of the work of consortia is continuing to expand and presents challenges for consortia development

- 2.19 The National Model set out the expected scope of consortia and adopted a relatively narrow view focusing on the provision of support and challenge to schools, including in the Foundation Phase, and for courses for learners aged 14 to 19. Some related areas of governor training, human resources advice and the alignment of Welsh in Education arrangements were also included. The Welsh Government has also given each consortium £200,000 of funding for work to improve attendance.

<sup>16</sup> The Welsh Government launched the National Support Programme in January 2013 and awarded the running of the programme to CfBT Education Trust. This programme offers specialist, additional support to help teachers, headteachers and learning and teaching assistants to implement the National Literacy and Numeracy Framework effectively.

2.20 In February 2015, the Welsh Government announced actions following consultation on raising the ambitions and educational attainment of children who are looked after in Wales. The Minister said that, from April 2015, responsibility for the looked-after-children element of the Pupil Deprivation Grant would be placed with the regional education consortia. It is not clear if the Welsh Government can determine the role of regional consortia without their agreement. Their task will be to ensure the delivery of strategic and coherent support, which makes a real, evidence based impact on the education of children who are looked after. Since looked-after children may attend special schools or provision outside the region's mainstream schools, this will require a significant extension of the scope of consortia in a very short timescale. Other recent announcements and reports involve anticipated additional roles for consortia in relation to national curriculum development and initial teacher training.

### The financial objectives of the Welsh Government are not clear and there is a lack of focus on assessing value for money throughout the system

2.21 During a speech in November 2011, the then Minister for Education and Skills said, 'according to local authority financial returns, in 2010-11 they collectively spent around £43 million on school improvement – a rate of £80 per pupil. Based on modelling that I have seen to date there are significant efficiencies that can be realised to better support schools and drive up standards. I expect these efficiencies to be achieved' and 'a £20 million reallocation is not unreasonable.' He said, 'my challenge to each region is to identify how these resources will be refocused, either straight to the frontline, or directly on raising standards in our most challenged schools'.

2.22 It is not yet clear if delivery of school improvement services through regional consortia is providing more efficient services than previously. We found that whilst the Welsh Government is monitoring the level of delegation of funding to schools, it was not actively monitoring the efficiency of consortia arrangements. As noted in [paragraph 1.12](#), local authority returns show a significant reduction in 'school improvement expenditure'. Regional working has not led to any reduction in director of education posts and four additional managing director posts have been created. We found that many local authorities have ceased to have 'head of school improvement' posts during 2011-13 but have since re-instated similar roles to provide the local authority with a lead officer to interact with the relevant senior or principal challenge adviser for the consortium. Most consortia have spent significant funds on the cost of redundancy for staff transferred from local authorities and who did not have a place in their structures, for example, the GwE audited accounts for 2013-14 show the cost of exit packages as £781,000 financed from the contributions from each originating local authority. We found that neither the Welsh Government nor regional consortia had yet assessed whether these changes in expenditure showed that working through consortia is achieving greater cost effectiveness or had established any criteria for doing so.

- 2.23 The short-term funding for some initiatives, such as Schools Challenge Cymru, has had an impact on the funding of consortia. Some services and support that would have been funded by the core consortia budgets were replaced by Schools Challenge Cymru funding. Whilst there was additional funding as a result of Schools Challenge Cymru, we found the extent and impact of this change was given little financial consideration by regional consortia or the Welsh Government.
- 2.24 The high-level outcome objectives are clear<sup>17</sup> and the Welsh Government and regional consortia are tracking progress of individual schools and groups of students. However, insufficient attention is given by regional consortia and the Welsh Government to the methodology required to assess the relative effectiveness of specific interventions and expenditure; whether one approach is better than another; or whether one short-term initiative is proving more effective than another. This will hinder attempts to assess the value for money of the change to regional working through consortia.

## Relationships between main stakeholders do not strongly enough reflect a partnership approach

- 2.25 The Welsh Government promoted the development of consortia as a means of improving efficiency and effectiveness of school improvement services. The consortia approach reflected the Welsh Government's lack of confidence that local authorities, working on their own, were likely to achieve the progress in school improvement that all stakeholders agreed was needed.
- 2.26 The Ministerial statement announcing the National Model noted that if consortia 'fail to deliver then there will be a top-slice of the Revenue Support Grant from 2015'<sup>18</sup>. This threat of withdrawal of funding from local authority remains.
- 2.27 The expectations of consortia by the Welsh Government are very high. But the arrangements are new and untested and some local authorities have been reluctant to transfer responsibilities, particularly whilst consortia lacked their full leadership and management capacity (paragraph 2.37).
- 2.28 The co-production of the National Model has not led to the development of collaborative relationships between the Welsh Government, consortia and local authorities in which strengths, weaknesses, developments and problems are shared, and the best solutions sought. Some regional consortia and local authority officers perceived that the Welsh Government does not always listen to the consortia and that trust levels were low. The lack of confidence between partners at this early stage has contributed to defensiveness in the relationships which has hindered progress. For example, the 'review and challenge' process by which the Welsh Government monitors the progress of consortia is a potentially helpful process. But, in practice, we found evidence of defensiveness and lack of openness by consortia have reduced the effectiveness of this process.

<sup>17</sup> The Welsh Government's Education strategy 'Qualified for Life' (2014) states that 'success will be measured by the attainment of our learners relative to that of learners in other countries' and that progress will be measured by improvements in learner's standards of literacy and numeracy; reductions in the attainment gap between learners eligible for free school meals and their non-free school meals peers; and improved confidence in the education system among parents, employers, further and higher education institutions'.

<sup>18</sup> **Written Statement – The National Model for Regional Working**, Minister for Education and Skills, February 2014.



- 2.29 The defensiveness about the difficulties consortia have experienced has led them to be competitive with each other rather than to try to maximise their learning and co-operation with each other. We found less sharing than we expected by consortia and reluctance to acknowledge common issues.
- 2.30 The confused understanding of the accountability of the main partners affects the relationships between them. To achieve effective school improvement all the main partners need to fulfil their roles well (Figure 2). Whilst schools see themselves as accountable to parents, children and communities, local authorities are accountable to their local electorates and the Welsh Government is accountable to the national electorate. Regional consortia do not have a direct accountability to an electorate but are wholly created agents of their local authorities and are therefore part of their accountability and scrutiny frameworks. Local and national governments are scrutinised by elected scrutiny bodies.
- 2.31 Within the school improvement system the Welsh Government – for example, by the threat to withdraw funding – appears to see local authorities and the consortia they establish as accountable to the Welsh Government and this hierarchical approach underlies the existing review and challenge process. Insufficient emphasis has been put on a ‘system review’ process by which all the main partners share in holding each other to account for their roles within the system and seek to build mutual trust and support to achieve improvements together.
- 2.32 We found that regional consortia and local authorities felt that the quality of communications with the Welsh Government was poor on some occasions, which affected the relationships within consortia and between consortia and the Welsh Government. Examples cited included the handling by the Welsh Government of communications about in-year grants’ claw-back in autumn 2014 and the delays in providing information on changes to grants that will apply from April 2015.

### The uncertain future for the present arrangements has led to a short-term focus

- 2.33 The uncertain position regarding possible local government mergers and the agreed priority to seek rapid improvement in educational outcomes have contributed to a desire to establish formal consortia, in line with the National Model, very rapidly. The Welsh Government expected the regional consortia to produce business plans showing what they would deliver by April 2014 and by April 2015. The regional consortia produced 2014-15 business plans quickly although the joint committees or boards did not agree the plans until during 2014, some as late as December 2014. The Welsh Government assessed that all the plans had weaknesses, for example, in the specific proposals for individual local authorities.
- 2.34 The desire to inject pace into the new arrangements to deliver effective school improvement services and the need to try to work to very short timescales has affected the rigour of some processes, such as the quality of business planning, and contributed to the defensiveness within the system.

- 2.35 We found this lack of rigour was also reflected in weaknesses in some of the grant monitoring arrangements by regional consortia. For example, most consortia were not effectively monitoring the use of the Pupil Deprivation Grant. Uncertain funding streams do not necessarily lead to the most efficient and effective use of resources.
- 2.36 The decision by the Welsh Government not to proceed with the submitted proposals for local government mergers should enable the Welsh Government and local authorities to foresee that regional consortia, on their present geographical and structural basis, are likely to continue for at least three years. This should enable the development of medium-term (three-year) delivery and financial plans which will support sustained development and may also make posts within consortia more attractive.

### **There has been limited action to improve the attractiveness of senior roles or to develop the capability of post holders**

- 2.37 An acknowledged weakness in Wales has been continued difficulty of recruitment to leadership roles for education in schools, local authorities and Welsh Government. Local authority leadership has been criticised in inspection reports by Estyn and several local authorities have experienced difficulties filling posts at director-of-education level. There is a need to attract the best talent from within Wales and elsewhere to such roles. The National Model reiterated the expectation that each consortium should appoint a managing director to provide strategic and collaborative leadership. Since their initial establishment in 2012, most regional consortia experienced recruitment difficulties, with GwE and CSC managing only 'interim' appointments for a managing director after initial rounds of recruitment and some consortia only having one final applicant for senior posts. Recruitment difficulties have also affected the next tier of consortia leadership; GwE only managed to complete its senior leadership team in April 2015. The difficulties in recruitment to senior leadership roles in the regional consortia have had a detrimental effect on the pace of development of the consortia.
- 2.38 The Welsh Government recognised internal capacity and capability issues and partly tackled this by the appointment of secondees with experience of leadership roles within education. This positive development has helped the departmental officers develop their understanding of the local implications of Welsh Government proposals and policies although it is uncertain whether the Welsh Government will sustain this arrangement and the benefits. In the same way the regional consortia have developed part-time challenge adviser roles for some seconded headteachers, the Welsh Government could consider the wider use of part-time secondments across the school improvement system to increase sharing of knowledge and understanding.

- 2.39 The Welsh Government has taken action to develop the skills and role of headteachers in Wales through the appointment of the National Leadership Development Board and the 'New Deal', announced in March 2015, supported by the development of the National Professional Learning Model.
- 2.40 Since the difficulties in recruiting education leaders in Wales were acknowledged, we found that there had been only limited attention to how the Welsh Government and local authorities can together develop the attractiveness of leadership positions in consortia, local and national government. We have been informed of work being developed by the WLGA, ADEW and the Virtual Staff College for a Leadership Development programme for directors and aspiring directors across Wales. This is to be welcomed but we found a more strategic approach to attracting and developing the most talented people to education leadership roles in consortia, local and national leadership was lacking.

## Part 3

Regional consortia are continuing to develop and broadly reflect the expected model, but effective governance and financial management arrangements are not yet fully in place



3.1 This section highlights aspects of the governance and financial management of regional consortia where further development is needed.

## All regional consortia continue to have weaknesses in their capacity and capability to deliver

3.2 We found that significant developments were taking place at all regional consortia, examples included:

- a development of a formal communication plan and improved engagement with all key stakeholders including headteachers and governors (CSC);
- b development of more school-to-school support, to ensure greater sustainability and embedding of change (EAS);
- c appointment of a strategic Head of Human Resources and the creation of a 'virtual HR team' and the development of several common policies (ERW); and,
- d a strong focus on under-performing schools which was showing some early positive progress (GwE).

3.3 However, the consortia were coming from different situations and the pace of change was inconsistent. As noted in [paragraph 2.37](#), the consortia have only recently come close to operating at full capacity in senior roles.

3.4 There was a general under-estimation of the scale of change required within regional consortia by the Welsh Government, local authorities and the regional consortia ([paragraph 1.16](#)). This is particularly evident in relation to the business management at each consortium. Most regional consortia did not put in place sufficient central resources for aspects such as finance, human resources, communications and business support. EAS, being a limited company, did not adequately consider the capacity required for a company secretary role. These issues have led to a lack of support for the core functions of regional consortia and overloading of work on key individuals.

3.5 Some regional consortia are still not ready to take on all the functions in the National Model. The National Model provides flexibility for a delay in the transfer of some services from local authorities to regional consortia until April 2015. The most common services delayed were 14 to 19 support, specialist human resources advice for schools, and governor support services, with CSC, ERW and GwE not delivering these functions regionally in 2014-15. However, ERW and GwE are still intending to leave the staff for these services within local authorities. This could create a variation in service provision and a lack of central contact point for schools and challenge advisers. ERW has established regional leads and 'virtual teams' to co-ordinate the services centrally.

- 3.6 There have particularly been inconsistencies in the specialist human resources support provided to schools, both across and within all regional consortia. To address this, consortia have sought to co-ordinate approaches across their regions. For example, ERW has been active in working with local authority human resources teams to develop a common approach across the region to various issues, including consultation with trades unions over performance management arrangements for teaching staff. This communication and engagement approach by ERW should provide more consistency in the advice given to avoid confusion and mixed messages. Local authorities and consortia representatives have also been working with the Welsh Government on a 'people management framework' to be developed as part of the National Model. This was published in April 2015.
- 3.7 Regional consortia have not consistently identified or engaged with partners who can assist with their senior capacity and capability. For example, the National Model indicates that the advisory board should include up to five individuals with expertise in education, leadership and corporate governance, but most regional consortia have typically been slow to engage with relevant individuals, who would be able to provide additional knowledge and support.

### Management structures below the joint committees or board are not yet functioning effectively in all regional consortia

- 3.8 Only CSC had established a fully functioning advisory board as expressed in the National Model by the end of January 2015. In EAS, prospective members of the advisory board have now been appointed as non-executive members of the full Board, with no advisory board in place. The 'Joint Executive Group', comprising the lead cabinet councillors and the directors of education, will lead the monitoring of EAS on behalf of the local authorities.
- 3.9 The directors of education have differing roles at each of the regional consortia. There is uncertainty within most of the regional consortia as to the appropriate extent of the involvement and influence of directors of education. In some cases, meetings of the regional directors forums do not adequately distinguish between consortia and non-consortia responsibilities. It can be unclear whether they are making decisions on behalf of the consortia or the local authority and meeting minutes do not report decisions in ways that are open or able to be scrutinised. This creates a lack of transparency.
- 3.10 In some regional consortia, senior management teams are not demonstrating effective strategic and operational management to meet the needs of the National Model. The GwE management team was incomplete until April 2015. Whilst CSC demonstrated a clear strategic approach, in some other consortia we found that senior consortia managers focused on the management of their teams and made a limited contribution to the strategic development of their consortium.

- 3.11 There is a lack of strategic risk management processes at all regional consortia. Three of the four consortia had a basic risk register in place but these did not always include significant risks, such as poor relationships undermining progress. Risk management was not an integral part of the management approach in most consortia, although CSC has included discussion of the risk register as a standing item at their joint committee from December 2014. Since our fieldwork, EAS has proposed establishing an audit committee for the company which will include the monitoring of risk management in its role.

### Scrutiny and audit functions are developing but are not yet fully established

- 3.12 Each local authority undertakes scrutiny of the regional consortia in relation to their individual local authority's performance. The level of scrutiny between local authorities, both within each regional consortium and nationally, is inconsistent. Scrutiny has typically been high-level, had little focus on financial information and value for money and in most cases has been on a reactive rather than proactive basis. However, some regional consortia are developing common scrutiny processes. For example, ERW is working with Scrutiny Officers from each local authority to establish a timetable detailing a set of mutual topic areas for each local authority to scrutinise, and the related data that the consortium will provide. This should provide reassurance to each local authority that they are scrutinising the key areas, and enable the consortium to better plan its use of resources.
- 3.13 None of the regions is undertaking scrutiny on each regional consortium as a whole. Chairs of the relevant local authority scrutiny committees were unlikely to have met each other. Regional working is intended to spread best practice across each region. An effective joint scrutiny function could consider the overall impact of regional working and whether the performance of individual authorities and the region as a whole is improving.
- 3.14 There are weaknesses in the audit function for most regional consortia. All four regional consortia have appointed one local authority to provide internal audit services and there has been varying levels of review conducted. In CSC, internal audit reports annually to the Joint Committee on the internal control environment. However, in other consortia, audit reports identified issues that were not reported to joint committees or Boards. Local authority audit committees have little involvement in most regional consortia despite being responsible for signing the local authority Annual Governance Statements, which cover the work of joint committees. As noted above, EAS is proposing to create an audit committee for the company. The proposed terms of reference suggest the committee will perform a traditional audit function and a joint scrutiny role, both of which are important for overall accountability of the consortia.

## Performance management is not strong enough to assess the effectiveness of activity

- 3.15 There was a lack of overall strategic direction in relation to coherent, agreed success measures for Wales until the publication of Qualified for Life in October 2014. All the regional consortia had prepared business plans for 2014-15, but not all business plans identified clear actions, with associated timescales and resources, or the expected impact of these actions, particularly in relation to local authority appendices. These deficiencies have contributed to a limited degree of effective performance reporting against business plans. Formal reporting against more detailed key performance indicators would clearly identify progress and areas of weakness for senior officers, both within the consortia and in local authorities.
- 3.16 The business plans for 2014-15 focused on a single financial year and had no element of medium-term planning, which would have provided direction and a strategic overview for a longer period.
- 3.17 For 2015-16, a business plan template has been provided by the Welsh Government and lists 16 priority areas (referencing the Qualified for Life strategic objectives and the National Model priorities). The template requires each consortium to indicate its own educational outcomes and key performance indicators for each of the priority areas.
- 3.18 There are inconsistent approaches to attainment target setting across the regional consortia. Attainment targets may be set at an individual pupil level, school level, local authority level and regional level. In some regional consortia, the regional targets set are higher than the aggregate of local authority or schools targets. This reflects the aspiration of the consortia but it creates confusion and mixed expectations for schools and local authorities.
- 3.19 There are varied methods of collating and analysing school and individual pupil level data at each regional consortium and these systems are typically under-developed. Each regional consortium has given little consideration to the approaches taken by the other consortia to data management. A more collaborative approach would save consortia resources and provide challenge advisers with consistent data for analysis.
- 3.20 Due to data sharing constraints, the Welsh Government cannot pass data directly to the regional consortia, which must access data via local authorities. This causes time delays and additional inconsistencies in the data consortia receive. The Welsh Government is currently working with local authorities and regional consortia on addressing this issue.



- 3.21 A key area of national focus for the Welsh Government is addressing the impact of deprivation on pupils' progress; however, the approach to the issue of deprivation is weak across the regional consortia. Some of the regional consortia have assigned a service lead for deprivation and poverty; but we found work had been limited to date and not all consortia staff were aware of the role. In ERW, senior management highlighted concerns over rural poverty, due to the geographical nature of the region, but had not sufficiently developed an approach to quantify and address the issue.
- 3.22 School-to-school support is a key element of the consortia interventions and noted in the National Model. However, none of the regional consortia have considered the degree to which their school improvement activities may have unintended consequences, such as the increased use of supply teachers. Reports issued by the Auditor General and Estyn in 2013 found that the use of supply teachers hampered learners' progress in developing skills, knowledge and understanding. By considering the extent and impact of covered lessons, regional consortia could identify whether this constituted a significant factor in improving outcomes and could propose changes where appropriate.
- 3.23 All regional consortia produce annual self-evaluation reports, and provided an updated report for this study. The reports generally focused on school performance and support interventions but typically had little evaluation of governance of the consortia. Most self-evaluation reports tended to be overly positive and did not appear to fully identify weaknesses across all aspects of their work. As the leaders in education improvement, consortia should be role models in the quality and objectivity of any form of self-assessment or self-evaluation report.

### **Financial management arrangements at most consortia are not sufficiently robust to assess the value for money achieved**

- 3.24 The level of school improvement funding that passes through the regional consortia differs greatly in each region, for both the local authority core contributions and school improvement related grants. For example, in ERW, local authorities retain the majority of their core contributions as most staff are employed by each local authority. In 2014-15, they agreed to pass only £250,000 to ERW for centrally employed staff. The majority of grants do not flow through the consortium with decisions about approximately £60 million of grant funding being made by directors of education, local authorities or schools. In CSC, for example, the majority of staff are employed centrally and all local authority contributions and most grant funding flow through the consortium and are distributed out where relevant. This totalled £58.4 million in 2013-14.
- 3.25 Most consortia are not adequately monitoring and reporting on all relevant school improvement income and expenditure, particularly where the funding does not flow through the consortium. This means senior management does not always have sufficient information to know the exact level of total expenditure related to consortia activities. In one consortium, each local authority employs a set number

of staff and it has not been quantified what this costs each local authority and how it compares with the suggested contribution detailed in the National Model. This means we have been unable to produce a direct comparison of spending between consortia.

- 3.26 Financial budget management is weak across most regional consortia. The 2014-15 business plans typically contained a basic budget with no detailed information on income and expenditure, and little consideration of grant funding. Reporting against budget to senior management and joint committees or boards is often unsatisfactory.
- 3.27 There is an inconsistent approach across the regional consortia to decision making related to grant expenditure. Some consortia have responsibility for allocating specific grants. This enables consortia to direct the grants in relation to their strategies. In other cases, local authorities decide the allocations, providing less control for regional consortia. Once allocated, there has generally been insufficient consideration of how best to monitor grant spending and there are variations in the approach to monitoring grant spending across consortia. There have been a number of qualifications of audits on school improvement related grants.
- 3.28 Funds are being spent without clear expenditure criteria being given to schools or local authorities in some cases. For example, GwE allocated around £500,000 across all schools to enable school-to-school support, however, there was initially limited guidance as to what schools should spend this on.
- 3.29 None of the regional consortia have set appropriate financial objectives, for example, in relation to gaining efficiencies from consortia working. Having objectives would provide a greater focus on financial planning and could help mitigate future financial pressures.
- 3.30 Most regional consortia have not adequately considered how to evidence the value for money of their activities. One regional consortium, EAS, is developing a tool intended to track each intervention a school has received, including its cost, against changes in the performance and school inspection category. While currently at a basic level, this shows a vision to consider value for money routinely and provide evidence for future intervention planning.

## Regional consortia have not yet ensured an appropriate level of openness and transparency

- 3.31 Two regional consortia do not make joint committee and board meeting agendas and minutes available publically, either on their own website or on local authority websites. In some cases, the minutes that are recorded are inadequate. For example, at the time of the review, in ERW the joint committee minutes did not clearly identify whether members have voting rights. This means the public do not have sufficient clarity over what participants are discussing in meetings or transparency over decision-making.

- 3.32 Regional consortia have not given enough acknowledgement of possible conflicts of interest within their operations. We identified instances of contracted part-time challenge advisers who also provide additional support to schools within that region as an external education consultant. By not actively identifying and managing conflicts of interest, the integrity of consortia work could be undermined.
- 3.33 In one regional consortium, CSC, there are potential issues of blurred accountability, which CSC had not adequately considered. Due to difficulties in filling posts, two of the senior challenge advisers also work as senior managers at a local authority. While this promotes a strong link between the consortium and the local authority, it is not clear who they are accountable to and creates inconsistency with the other local authorities. CSC is now proposing to establish joint roles in all local authorities which are held to account through termly impact reviews. We also found other situations in which challenge advisers worked part time for a consortium and part time for another agency. Consortia were not alert to the potential conflicts of interest involved in such situations.

### Regional consortia are developing their engagement with the range of stakeholders and staff

- 3.34 Some regional consortia have established positive staff engagement. EAS holds a service review day at the end of each term for all staff to discuss progress, feedback from local authorities, success stories and plan improvements. This keeps all staff informed and engages them in the future success of the consortium.
- 3.35 Although all regional consortia undertake ad hoc engagement activities with key stakeholders, most have not yet fully developed a robust communications strategy. For example, GwE has been late to develop its own branding and identity, and currently operates through a pre-existing 'North Wales Consortium' website, which includes very little information about GwE and its activities. GwE has contracted an external company to replace this with a dedicated site. Conversely, CSC has a detailed communications plan, which includes a comprehensive website and monthly newsletter to key stakeholders. This means stakeholders are aware of the consortium's activities and future plans, and are more likely to engage with the consortium.
- 3.36 Only one regional consortium, GwE, has formally involved the faith-school sector in its governance arrangements by having a diocesan representative as a non-voting joint committee member. The diocesan directors of education stated the working relationship with all regional consortia has improved although there is no formal protocol for working together. This would better support faith schools and ensure regional consistency.

## Appendices

Appendix 1 – Study methods

Appendix 2 – Main findings and recommendations from the Estyn report on the work of regional consortia for school improvement services

Appendix 3 – Regional consortia arrangements



# Appendix 1 – Study methods

## Review of literature, data and statistics

We reviewed a wide range of documents and data, including:

- Welsh Government strategic documents and policies relating to school improvement, including the National Model for Regional Working.
- Welsh Government and local authority expenditure and grant data relating to school improvement.
- Reviews commissioned by the Welsh Government, including those undertaken by Robert Hill Consulting and the Commission on Public Service Governance and Delivery.
- External reviews, including those undertaken by Estyn and the Organisation for Economic Co-operation and Development.
- Governance frameworks including **The Good Governance Standard for Public Services** published by the Independent Commission on Good Governance in Public Services, January 2005.

## Interviews with the Welsh Government

We interviewed a range of Welsh Government officials with responsibility for school improvement, as well as officials in areas of finance, legal services and internal audit.

## Visits to regional consortia

We visited all four regional consortia between November 2014 and January 2015. We carried out the visits in conjunction with Estyn which undertook a ‘thematic survey’ to evaluate the work of regional consortia for school improvement services as part of their remit work for the Minister for Education and Skills.

During the visits, we interviewed a range of individuals including regional consortia management, senior local authority officers and elected members.

We also considered a range of documents provided by each consortium up to 31 January 2015 including legal agreements, business plans, policies, budgets, financial analysis, meeting minutes, and self-evaluations.

## Other work

We attended the autumn 2014 ‘review and challenge’ meetings between the Welsh Government and each of the regional consortia.

We also spoke to the WLGA in relation to school improvement services.

# Appendix 2 – Main findings and recommendations from the Estyn report on the work of regional consortia for school improvement services

Estyn undertook work in response to a request from the Welsh Government in the Minister's annual remit letter for 2014-15. Estyn examined the governance and leadership of the regional consortia, and the effectiveness of the services to schools, in the context of current school and pupil performance. Their report, **Improving schools through regional education consortia**, based on the visits to regional consortia carried out with Wales Audit Office staff and other shared evidence, has been published together with this report and is available from [www.estyn.gov.uk](http://www.estyn.gov.uk).

## Main findings

Although the general improvements in standards of pupil attainment over the past three years cannot be solely attributed to the development of regional consortia, the published data reflects a gradual improvement in pupil attainment across all four regions. At key stage 2 pupils attain at similar levels across all regions but at key stage 4 there is greater variation in levels of pupil outcomes. Performance is consistently higher in GWE and ERW than in CSC and EAS, the latter two regions having comparatively greater levels of social deprivation.

School inspection outcomes are broadly similar across the four regions, although there has been a notably higher proportion of schools causing concern in EAS in recent years. In ERW a comparatively high number of schools requiring follow-up activity after their inspection have not made enough progress and as a result have had their level of follow-up escalated.

The regional consortia have been slow to fully implement governance arrangements in line with the Welsh Government's National Model for Regional Working. All the regional consortia struggled to fill senior posts, which adversely affected their capacity to direct and manage work and highlights the lack of a national strategic approach to develop senior leaders. It is too early to judge the effectiveness of the governance arrangements and senior leadership and management of the consortia.

All the consortia prepared business plans for 2014-2015 that focus appropriately on the most important areas for improvement. However, all the plans have important weaknesses in them. In particular, the plans do not identify well enough what impact is expected from actions taken and how and when this will be measured. This is particularly the case for the sections that set out how the consortia tailor their work to meet the needs of individual local authorities. None of the consortia has a medium term plan in place to guide a strategic approach to school improvement.

While there are examples of robust scrutiny by elected members of how a regional consortium is working with individual schools at a local authority level, scrutiny committees do not hold their senior officers and representatives to account well enough for their role in ensuring that the consortium meets the needs of the authority's schools. In addition there is no joint approach to scrutinising the effectiveness of the consortium as a whole in any region.

The self-evaluation reports produced by the regional consortia are in the main overly positive. These reports identify strengths more accurately and convincingly than shortcomings.

Most of the regional consortia have engaged effectively with local authority officers, school leaders and trade unions in developing their regional priorities and policies for school improvement. However, none of the consortia has engaged enough with diocesan authorities.

The regional consortia have strengthened their quality assurance arrangements for challenge advisers, particularly since September 2014, and there is greater consistency in the work of challenge advisers as a result. However, the arrangements are not always implemented rigorously enough and pre-inspection reports for schools still do not always match the outcome of inspections closely enough.

The EAS and CSC have more than twice as many schools involved in the Schools Challenge Cymru programme as the other two regions. In these regions, the consortia are unclear about their working relationship with the schools in the programme. The consortia are also unclear about how they will evaluate their specific role in improvements in these schools and the implications this has for any wider evaluation of school improvement across Wales.

None of the regional consortia has a coherent strategic approach to reduce the impact of deprivation on attainment. The regional consortia have not monitored closely enough how well schools are using the Pupil Deprivation Grant.

All the consortia have suitable arrangements in place with local authorities for sharing useful information from many service areas relevant to their work, such as additional learning needs, social inclusion and wellbeing, finance and complaints. However, none of the consortia has a fully developed and consistently used system to collate, analyse and share information about the progress of pupils and schools.

Regional consortia generally know how well many of their schools are currently performing through the work of challenge advisers, supported by their analysis of attainment data. Most headteachers and chairs of governing bodies report that the performance of their school is scrutinised closely and fairly by challenge advisers.

Although challenge advisers generally know what assessment data indicates about a school's performance, this does not always mean that they know the school well enough. Challenge advisers are not always diagnostic enough in understanding why a school is performing well or not. Challenge advisers are not always involved enough in moderating teacher assessment and they are less effective at evaluating teaching and leadership than standards. However, weaknesses in challenge adviser work are not as prevalent as they were when consortia began to formalise in 2012.

Overall, regional consortia are better at challenging schools about their current performance than supporting them to improve. All the consortia have an appropriately strong focus on supporting improvement in literacy and numeracy. However, support for schools in many other areas of learning, such as non-core subjects, is either weak, inconsistent or unavailable. In the EAS and CSC, there is not enough support for Welsh-medium schools. The consortia are developing strategies to facilitate schools to support each other, although only CSC involves all schools in their strategy. The consortia do not monitor and evaluate well enough the impact of their support to improve schools, whether this support is provided directly or brokered or is school-to-school support that they facilitate.

Regional consortia usually provide appropriate and timely information to local authorities about schools causing concern. Although local authorities are using their statutory powers of intervention more readily, a minority are still reluctant to intervene even when their regional consortium provides a clear mandate for action. Once a local authority issues a statutory warning notice to improve to a school, the regional consortium usually works well with both the school and the local authority to agree a suitable plan and monitor progress.

Estyn and the Wales Audit Office provided verbal feedback to the regional consortia following visits to gather evidence for this survey. The consortia have responded positively to their feedback and have already begun to address many of the issues raised in this report.



## Recommendations

Regional consortia should:

- R1 Improve performance management arrangements by:
- planning for the medium term to ensure a strategic approach to school improvement;
  - ensuring that plans contain actions that are specific and measurable, with appropriate targets, costings and milestones for delivery;
  - capturing, sharing and using data (from pupil level up) efficiently and effectively;
  - monitoring the progress of pupils and schools regularly;
  - taking a more robust approach to identifying and managing risks;
  - realistically self-evaluating their strengths and shortcomings; and
  - tightly managing the individual performance of their staff.
- R2 Secure greater consistency in the quality of challenge advisers' evaluations of schools, particularly in relation to teaching and leadership.
- R3 Develop clearer strategies to address the impact of deprivation upon education outcomes and ensure that all actions are coherent in this purpose.
- R4 Improve the quality and range of support for schools and in particular:
- develop clearer strategies for maximising the potential of school-to-school support; and
  - provide or broker better support for teaching and learning in non-core subject areas.
- R5 Involve diocesan authorities effectively in the strategic planning and evaluation of regional services.

Local authorities should:

- R6 Support their regional consortium to develop medium-term business plans and ensure that all plans take account of the needs of their local schools.
- R7 Develop formal working arrangements between scrutiny committees in their consortium in order to scrutinise the work and impact of their regional consortium.

The Welsh Government should:

- R8 Improve its strategy to develop senior leaders and managers for education at local authority and regional consortia level.
- R9 Work more collaboratively with consortia and local authorities to agree short and medium-term business plans and reduce requests to change and add to plans mid-year.
- R10 Ensure that school categorisation is rigorously moderated across the consortia.
- R11 Develop an agreed understanding between teachers, schools, local authorities, regional consortia and Welsh Government about the purpose and use of attainment targets.
- R12 Engage more effectively with diocesan authorities in developing its strategy for school improvement.
- R13 Ensure that consortia, local authorities and diocesan authorities are clear about their respective roles and responsibilities for schools in the Schools Challenge Cymru programme.

# Appendix 3 – Regional consortia arrangements

## EAS

EAS is a company set up by five local authorities which commission EAS to provide school improvement services.

EAS staff are employed by the company.

South East Wales Consortium (SEWC) brings together the five local authority education directors and EAS managing director who co-ordinate the strategic direction of EAS and other aspects of education that are beyond the remit of EAS, on a regional basis.



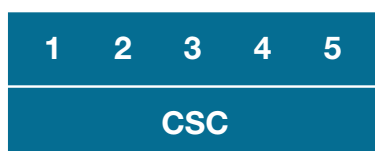
- 1 Blaenau Gwent
- 2 Caerphilly
- 3 Monmouthshire
- 4 Newport
- 5 Torfaen

## CSC

CSC is a Joint Committee of five local authorities providing a joint school improvement service.

CSC staff are employed by Rhondda Cynon Taf.

The CSC Director's Strategic Group enables the local authority education directors to contribute as a steering group of the consortium.



- 1 Bridgend
- 2 Cardiff
- 3 Merthyr Tydfil
- 4 Rhondda Cynon Taf
- 5 Vale of Glamorgan

## GwE

GwE is a Joint Committee of six local authorities providing a joint school improvement service.

Local authorities are organised into three hubs for delivery of service.

GwE staff are employed by Gwynedd.

The North Wales Consortium of the six education directors organises other aspects of education at a regional level, including aspects that other consortia include in their service. The Consortium also acts as a Management Board for GwE.



- Hub 1 - 1 Anglesey + 2 Gwynedd
- Hub 2 - 3 Conwy + 4 Denbighshire
- Hub 3 - 5 Flintshire + 6 Wrexham

## ERW

ERW is a Joint Committee of six local authorities providing a joint school improvement service.

Local authorities are organised into three hubs for delivery of service.

Central ERW staff are employed by Pembrokeshire. All other staff are employed by individual local authorities. The central function is smaller in ERW than in the other consortia.

The local authority education directors sit on ERW's advisory board.



- Hub 1 - 1 Ceredigion + 2 Powys
- Hub 2 - 3 Carmarthenshire + 4 Pembrokeshire
- Hub 3 - 5 Neath Port Talbot + 6 Swansea

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