

AGENDA MANAGEMENT SHEET

Name of Committee

The Cabinet

Date of Committee

2nd February 2006

Report Title

Education White Paper: “Higher Standards, Better Schools for All”

Summary

This report summarises the Government’s White Paper: “Higher Standards, Better Schools for All” and asks Cabinet to comment on the draft response.

For further information please contact:

Mark Gore
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Tel: 01926 412887
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Would the recommended decision be contrary to the Budget and Policy Framework? [please identify relevant plan/budget provision]

No

Background papers

White Paper: “Higher Standards, Better Schools for All”, October 2005

CONSULTATION ALREADY UNDERTAKEN:-

Details to be specified

Other Committees

Children and Young People Overview and Scrutiny Committee 15th December 2005

Local Member(s)

.....

Other Elected Members

O&S Spokespersons for information:
Cllr Helen McCarthy – “I commend the draft response but feel that there should be a more specific reference on p.B3 No.6 (The engagement of parents – 2nd para) to a requirement for increased government funding for authorities such as Warwickshire that the White Paper raises with the extra need for transport if the greater choice for children, young people and parents either on or off benefits is to be delivered. It should also be noted that there could and will be disadvantaged children and young people even if their parents are not on benefits.

There should be some awareness in the White Paper that without extra funding, meeting the individual needs of young people through 'personalisation' could also lead to difficult transport costs for smaller schools in more rural areas if, for instance, extra funds are given to schools per capita for such things as vocational education, even taking 'clustering' into account."

Cllr Richard Grant – "I fully support the aspirations of the White Paper to address the underachievement of pupils particularly from deprived backgrounds. However, I do have real concerns that some of the proposals will undermine these good intentions. The proposed letter to the DfES is a fair summary of the concerns expressed by the O&S Committee"

Cllr Jill Dill-Russell – "I strongly support the letter to the Secretary of State"

- Cabinet Member Cllr John Burton
- Other Cabinet Members consulted Cllr Izzi Seccombe – *"approve report for Cabinet"*
Cllr Peter Fowler
- Chief Executive
- Legal Jane Pollard / Richard Freeth – *"fine"*
- Finance David Clarke, Strategic Director of Resources – *"fine"*
- Other Chief Officers
- District Councils
- Health Authority
- Police
- Other Bodies/Individuals Seminar held 6th December 2005 for members of the Children & Young People O&S Committee, all remaining Councillors and invited guests of the Committee incorporating a presentation on the White Paper followed by a question and answer session

FINAL DECISION YES

The Cabinet – 2nd February 2006

Education White Paper: “Higher Standards, Better Schools for All”

Report of the Strategic Director for Children, Young People and Families

Recommendation:

That Cabinet are asked to comment on the draft response and to authorise the Director for Children, Young People & Families and the County Education Officer to forward the response, as amended, to the Secretary of State and to the Warwickshire Members of Parliament.

1. In October 2005, the Government published its White Paper “Higher Standards, Better Schools for All”, which set out proposals for further reform of the schools system. A briefing on the White Paper open to all Members was held on 6th December. At its last meeting on 15th December the Children and Young People Overview and Scrutiny Committee considered the White Paper in order that the views of the Committee could be incorporated in the draft response presented to Cabinet for approval.
2. A paper which summarised the White Paper and which formed the basis of the report to the Overview and Scrutiny Committee is attached as **Appendix A**.
3. A draft response to the White Paper which incorporates the comments of Members of the Overview and Scrutiny Committee is attached as **Appendix B**.

MARION DAVIS
Strategic Director for Children,
Young People and Families
22 Northgate Street
Warwick

18th January 2006

AGENDA MANAGEMENT SHEET

Name of Committee Children and Young People Overview and Scrutiny Committee

Date of Committee 15th December 2005

Report Title White Paper: Higher Standards, Better Schools for All

Summary This report summarises the Government's White Paper: Higher Standards, Better Schools for All.

For further information please contact: Mark Gore
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Tel: 01926 412887
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Would the recommended decision be contrary to the Budget and Policy Framework? [please identify relevant plan/budget provision] No

Background papers White Paper: Higher Standards, Better Schools for All, October 2005

CONSULTATION ALREADY UNDERTAKEN:- Details to be specified

Other Committees

Local Member(s)

Other Elected Members Cllr Helen McCarthy
Cllr Richard Grant
Cllr Jill Dill-Russell

Cabinet Member For information:
Cllr Izzi Seccombe
Cllr John Burton

- Chief Executive
- Legal Jane Pollard – “fine”
- Finance
- Other Chief Officers
- District Councils
- Health Authority
- Police
- Other Bodies/Individuals Seminar held 6th December 2005 for members of this O&S Committee, all remaining Councillors and invited guests of the Committee incorporating a presentation on the White Paper followed by a question and answer session

FINAL DECISION **NO**

SUGGESTED NEXT STEPS:

Details to be specified

- Further consideration by this Committee
- To Council
- To Cabinet
- To an O & S Committee
- To an Area Committee
- Further Consultation

Children and Young People Overview and Scrutiny Committee – 15th December 2005

White Paper: Higher Standards, Better Schools for All

Report of the County Education Officer

Recommendations:

- (1) That the Committee consider and comment on the White Paper.
- (2) That the comments of the Committee are included in the draft response to the DfES being prepared for the Cabinet.

1. Context

- 1.1 On 25th October 2005 the Department for Education and Skills (DfES) launched the White Paper 'Higher Standards, Better Schools for All', subtitled 'More Choice for Parents and Pupils'. This was preceded by an announcement by the Prime Minister on 24th October that schools are doing well, but it is now time to 'lift our ambitions'. The White Paper lays out the Government's intentions for doing this, which will form part of a new Education Bill to be presented to Parliament. It follows on from the Children Act 2004, the White Paper on 14-19 reforms and the Education Act 2005. All of these are implementing proposals put forward by the Government, prior to the election, in its Five Year Strategy for Education.
- 1.2 The key themes of the Five Year Strategy can be summarised as follows:
 - Promoting diversity, flexibility and choice in the school system, particularly secondary schools, with each becoming a specialist school.
 - Giving increasing autonomy to schools within a "...framework of fair funding and fair admissions".
 - Meeting the individual needs of children and young people through 'personalisation' and an emphasis on choice for them and their parents.
 - Addressing the link between social class and achievement and raising the achievement of children and young people from less advantaged backgrounds.

- Emphasising a strategic role for local authorities as a commissioner of services and a champion of children and young people and their families.
- 1.3 This report discusses the main issues in the White Paper. The Committee are asked to comment so that a draft response can be drawn up for consideration by the Cabinet at a future meeting.

2. Main issues arising from the White Paper

2.1 Changes to schools

- 2.1.1 New schools will become Trust, Foundation, Voluntary Aided or Academies, with the majority of all secondary schools becoming specialist within the next two years. Foundation, Trust and Voluntary Aided schools will be able to make their own admission arrangements to suit their local circumstances, within the framework of the Admissions Code, as do Foundation and Voluntary Aided schools now. New schools must propose admission arrangements which will promote community and social integration.
- 2.1.2 There will be a continuation of specialist schools able to select up to 10% of their pupils by ability in the specialist area, with specialist schools now being able to take some pupils from outside of their usual catchment area.
- 2.1.3 It will be easier for independent schools to become part of the maintained sector. They will have to fulfil the same requirements as state schools and will not be able to charge fees. Independent schools which join the state sector may be eligible for Academy status.
- 2.1.4 By 2008 it is expected that half of primary schools and a third of secondary schools will provide access to extended services, with all schools providing extended services by 2010.
- 2.1.5 Schools which are oversubscribed will be encouraged to expand. If this is not possible, mergers or joining up with other schools will be encouraged, with possible federations with one governing body.
- 2.1.6 Self-governing schools will be encouraged with an expectation that they will acquire a Trust. A Trust will be a non-profit organisation, which will have the power to appoint governors. The Charity Commission will regulate Trusts, putting a duty on them to promote positive race relations and a cohesive community. Consultation with parents would take place followed by proposals before a school forms or joins a Trust. Trusts will be able to apply to the Secretary of State for flexibilities, which will apply to all schools in the Trust, creating school 'brands'.
- 2.1.7 As schools become more autonomous, governing bodies will have an enhanced role.

2.1.8 Schools are reminded to carry out their functions with a view to promoting the welfare of and safeguarding of children, as set out in Every Child Matters. This will involve multi-agency work and appropriate training for staff.

2.2 Parents

2.2.1 It will be a requirement for primary and secondary schools to provide information to parents on their child's progress at least three times per year, with meetings available for parents to meet with teachers.

2.2.2 There will be updated guidance on home-school agreements, with materials provided to parents.

2.2.3 Schools will be provided with additional funding to offer information sessions to parents when their children are starting primary and secondary school.

2.2.4 Parent Councils will be encouraged to allow the governing body to engage with parents.

2.2.5 Governing bodies will have a statutory duty to take parents' views into account and Ofsted will check the engagement of schools with parents. Ofsted will have a new power to investigate parents' concerns about a school and to take further action where necessary.

2.3 Disadvantaged children

2.3.1 The government want to see raised standards for all, allowing children to have the means to achieve their potential in an excellent education system regardless of their background. To achieve this, the White Paper states that schools will need free rein to decide how they manage the school and the teaching and support which they provide to individual pupils and their parents.

2.3.2 The government feel that personalised learning will challenge the social and ethnic achievement gaps. The methods for achieving this include:

- Further support in secondary schools to those who currently underachieve.
- Additional lessons for pupils who require them.
- Provision for gifted and talented pupils.
- A wider choice for secondary study, using extended schools where necessary.

2.3.3 Families in receipt of the highest level of Working Tax Credit or pupils who are entitled to free school meals will be able to express a preference for the nearest three secondary schools and will be entitled to free school transport, where the schools are between two and six miles from home.

2.3.4 The Teach First Scheme will be extended from London to five other cities to attract the best graduates to the least advantaged areas.

2.4 Discipline

- 2.4.1 The introduction of a clear legal right for teachers to discipline pupils will be supported by the expectation that each school will have a clear set of rules and sanctions.
- 2.4.2 Parenting contracts will be used earlier and parenting orders will be extended.
- 2.4.3 There is an expectation that all secondary schools will have formed or joined partnerships with protocols in place for 'hard to place' pupils by 2007, resulting in a reduction of poor behaviour and truancy.
- 2.4.4 Schools will be expected to record properly all exclusions.
- 2.4.5 Parents will be responsible for pupils temporarily excluded from school for the first five days, ensuring that they complete school work. For temporary exclusions of more than five days, headteachers will be expected to develop provision collectively on and off site with devolved funding.

2.5 The changing role of the Local Authority

- 2.5.1 The Local Authority will act as a commissioner and champion of parents and pupils, rather than being a provider of education, with a statutory duty to promote choice, fair access and diversity, in accordance with the policy of Every Child Matters, the Five Year Strategy and the Youth Matters Green Paper. To achieve these aims the Local Authority will need to adapt and become less involved in the day-to-day running of schools.
- 2.5.2 The term 'local education authority' will no longer be used due to the differing role that the authority will perform.
- 2.5.3 Local authorities are already changing their structures and way of working due to the Trust arrangements obliged under the Children Act 2004 and on which local authorities are taking a lead. Local authorities will be expected to carry out certain duties, as set out below:
 - (a) The code of practice on local authority and school relations will be removed and Authorities given the power to act more decisively on receipt of an unfavourable school Ofsted report. Actions could include immediate change to the headteacher and school management team, a partnership with another school, or even the closure of the school.
 - (b) Schools which are in special measures will be expected to show real progress within a year or it is likely that the school will be closed and replaced on the same site. Schools with improvement notices will be placed in special measures if improvement is not achieved within a year. Schools which are failing or at risk of failing will be required by the Local Authority to join a collaborative arrangement.

- (c) Local Authorities will have a duty to keep parents informed when a school is judged to be inadequate by Ofsted, helping parents to understand the issues and the action available to tackle them.
- (d) Local Authorities will be expected to use the information available to them, through School Improvement Partners (SIPs) and the increasing pupil level data available, to take early action against unacceptable school provision. Schools which are failing particular groups of pupils will be challenged, along with those which are seen to be 'coasting'. It will become easier for Local Authorities to give warning notices and to take quicker and more extreme action against school failure when identified by Ofsted.
- (e) Local Authorities will take on the role to decide whether proposals for new schools or major changes are accepted. School Organisation Committees (SOCs) will no longer exist. An Office of the Schools Commissioner will be established to promote new schools and to support the Local Authority in their new commissioning role.
- (f) If parents feel that standards of local education require improving, e.g. lack of a faith school, they have the right to ask the Local Authority for a new school. The Local Authority will have a duty to investigate whether this request should be taken forward or to decide whether an alternative is necessary to meet the community needs. The Local Authority will be able to specify the community that a new school will serve. If a proposal is not taken forward, parents will be able to appeal to the Schools Adjudicator. A dedicated capital fund will support strong proposals from parents, with the Local Authority being expected normally to provide a site if proposals are successful. Capital funding will come from existing programmes, with Authorities attempting to minimise costs and placing new schools on existing sites where possible.
- (g) The creation of new schools and expansion of oversubscribed schools could result in surplus capacities. There will be an expectation on Local Authorities to take quick action to close schools failing to secure the appropriate numbers.
- (h) Local Authorities will have the power to amend admission arrangements if they do not follow the Admissions Code and which are not of benefit to all local children and families.
- (i) The White Paper demands choice for all. This will involve providing better information to parents about schools, with Local Authorities expected to provide more detailed information and advise parents on how to analyse information about secondary schools. Local Authorities will be given £12million to have in place a network of 'choice advisors' by 2008.

- (j) An extended school transport offer to all pupils will be considered in a pilot with Local Authorities, to promote choice and fair admissions.
- (k) Children facing the greatest disadvantage will receive the most support, with additional funding being provided to Local Authorities who have the highest numbers of underachieving and deprived pupils.
- (l) By December 2005, it is expected that all authorities will have arrangements in place to identify children who are missing from education so that provision can be made for them.
- (m) In early 2006 there will be consultation on further proposals to improve the outcomes for looked-after children. Authorities and not schools will be statutorily responsible for ensuring the educational outcomes of looked-after children are promoted, with School Improvement Partners (SIPs) to hold schools to account for the support they provide to this group.
- (n) By April 2006, as part of their Children and Young People's Plan (CYPP), Local Authorities will have to draw up a strategic plan for the pattern of schools in their area. This will include the number of schools, the size and the type of school. Local Authorities are expected to consult schools about their CYPP and schools are expected to have regard for the plan.
- (o) If Local Authorities fail to perform their new duties adequately the Schools Commissioner can challenge this. The Commissioner will challenge authorities to work with each other to provide choice and to set up Academies. Local parental satisfaction and school standards will be monitored and reported annually by the Commissioner.
- (p) As with secondary schools, primary phase schools will compete for providers, with Local Authorities only publishing their own proposals for a Foundation school if a suitable provider cannot be sourced.
- (q) Local Authorities will have to provide full-time education for permanently excluded pupils from the sixth day and not the present rule of the sixteenth day.
- (r) The DfES will continue its work with Local Authorities to promote and accredit programmes of training for governors.
- (s) Continued consultation will take place with local government to see whether Local Authorities have the mechanisms to fulfil their role as described in the White Paper and what further powers may be necessary to fulfil this.

3. Implications for Warwickshire

3.1 The White Paper continues the themes of government policy both Conservative and Labour, in relation to schools:

- Greater independence and autonomy for schools.
- Personalisation and choice.
- The local authority as a commissioner of services' rather than a provider and an advocate for pupils and families.
- Diversity within the school sector and in particular for secondary schools.

3.2 Warwickshire has supported and encouraged the autonomy of schools and is well used to working within that framework. Indeed the success of the Education Service in Warwickshire is in no small part due to the quality of the relationship between schools and the Authority. The evidence of the Ofsted inspection of the Authority is that schools value the support the Authority gives and because of the trust established over many years accept challenge from the Authority. While, therefore, there is no evidence that the majority of schools in Warwickshire are seeking greater freedoms, the principle of greater autonomy for schools should not present difficulties in the county.

3.3 Moreover the strengthening of the Authority's role to intervene decisively in schools which are failing and to act as a champion and advocate for children, young people and their parents addresses some of the concerns expressed in the county and nationally about the monitoring of and accountability for standards in increasingly autonomous schools and the 'policing' of, for example, admission policies of schools which make their own arrangements.

3.4 However there are concerns about some of the proposals in the White Paper including the following:

- There is significant emphasis on the rights of parents which is to be welcomed but little in the White Paper about the responsibilities of parents.
- Allowing popular schools to expand and the 'market' to operate will make it difficult for the Authority to fulfil the statutory duty to ensure the provision of school places and to ensure effective and efficient use of resources. Moreover the success of this strategy depends on the Authority being able to act decisively to reduce surplus places. Experience suggests this is a lengthy and complex process, often controversial and often, if not well managed, disruptive to children's education.
- Proposals to give more choice to pupils from low income families of school, with support from 'choice' advisors, will undoubtedly be difficult to administer, expensive to operate and very possibly unpopular with parents whose preference for their local school may not be met as a result.

- It will undoubtedly be difficult to co-ordinate and manage an admissions system in the interests of all parents/carers and their children with 250 separate and different admissions authorities.

4. Recommendations

- 4.1 The Committee are asked to consider the White Paper and comment on it.
- 4.2 The comments of the Committee will be reported to the Cabinet and included in the draft response to be returned to the DfES.

ERIC WOOD
County Education Officer

22 Northgate Street
Warwick

1st December 2005

My ref: EW/MG/ADG

The Secretary of State,
Department of Education and Skills,
Sanctuary Buildings,
Great Smith Street,
LONDON. SW1P 3BT

February 2006

Dear Secretary of State,

Higher Standards, Better Schools for All
A response to the Education White Paper

We have been asked to write in response to the Government's Education White Paper on behalf of the County Council. This submission by the Authority follows detailed discussion by all parties on the Children and Young People Overview and Scrutiny Committee, whose comments have been incorporated in the response and agreed by the Cabinet.

This Authority supports many of the aims and aspirations set out by the Government including the emphasis on continuing to raise standards, on helping parents to engage better in the education of their children, in overcoming the negative effects of poor behaviour, on placing the child and young person at the heart of the system so that his or her individual needs and aspirations can be best met, and on the autonomy of schools within a "framework of fair funding and fair admissions".

The Authority also supports many of the proposals set out in the White Paper to achieve these aims and aspirations. However we do have serious concerns about aspects of the proposals which are outlined below.

1. Autonomous schools

Warwickshire has supported and encouraged the autonomy of schools and is well used to working within that framework. Schools have been able to develop their own individual ethos, to innovate as they wish and to respond to the needs of the pupils and communities they serve. There is significant diversity in the secondary system in the county with high schools, faith schools and grammar schools, with most schools now having achieved specialist college status and all planning to achieve this. The evidence of two Ofsted inspections of the Authority is that the success of the Education service in Warwickshire is due in no small part to the excellent relationship between the Authority and its schools whether Community, Voluntary or Foundation. Schools value the support of the Authority and accept challenge from the Authority because of the trust built up over many years.

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Moreover almost all the Community and Foundation schools in the county operate very similar admissions arrangements and no specialist schools have introduced selection by aptitude.

In this context the principle of greater autonomy for schools could be supported. However there is no evidence that schools in Warwickshire are seeking greater freedom or feel that they have been inhibited from developing a distinctive ethos or innovative practice. Moreover the responsibilities placed on governors, unpaid volunteers, are already considerable and likely to grow as schools develop extended services in response to the Every Child Matters agenda.

The Authority is unclear, therefore, about the benefits of the proposed trust status for schools. The freedoms which could be given to trust schools are similar to those of foundation schools and could be extended to all schools if such freedoms do contribute to raising standards. The Authority would wish to have clarification of the accountability of trusts as considerable public assets would be transferred to them.

2. Admissions

The Authority is concerned about its capacity to manage in the area as a whole, in the interests of children and young people, an admission system which would include in the case of Warwickshire more than 250 admissions authorities and potentially 250 different admissions arrangements. The Admissions Code of Practice provides a framework but the Code has the status of guidance and is not statutory. It is difficult to see why there is such an emphasis on giving this responsibility and freedom to schools with the potential for schools to put in place arrangements to 'choose' children, when the Government are promoting parental choice and empowering parents. The Authority would urge the Government to consider whether the Code of Practice should be statutory to enable the Authority to better manage the system in the interests of young people and their parents.

3. Expansion of popular schools

The Authority remains concerned also about proposals in the White Paper to allow parents to request new schools and to allow popular over-subscribed schools to expand, at a time when, in common with most other authorities, Warwickshire is faced with significant falling rolls in the primary sector feeding through into the secondary sector. The presumption that over-subscribed schools should expand will put increasing pressure on other less popular schools (although not necessarily less effective schools) and the Authority may need to close schools. School closure is inevitably a lengthy and controversial process and one which is potentially disruptive for the education of pupils in the school at the time of closure. Such a process is not to be undertaken lightly.

4. Promotion of new schools

The Authority welcomes a redefinition of its role as a commissioner of schools rather than as a direct provider. The County Council has very effectively played this role in relation to pre-school education with a mix of local authority, voluntary and private provision across the county. With this example of good practice in mind it is regrettable that the Government have ruled out the possibility of any new school being a community school irrespective of the wishes of the local community or parents. The Authority also questions whether it is efficient or necessary to establish a new bureaucracy in the form of the new Schools Commissioner to promote diversity.

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5. Autonomy and interdependence

The Authority welcomes the emphasis within the White Paper on the need for schools, although autonomous and independent, to work together with other schools and education providers, other agencies and the County Council to deliver the agenda of 'Every Child Matters'. The Government may wish to consider whether the duty on schools to co-operate and collaborate should be strengthened.

6. The engagement of parents

The Authority is supportive of proposals in the White Paper to engage parents in the education of their children by providing information, establishing parent councils and guidance on home-to-school agreements. However not all parents are or can be equally engaged or wish to be, and many parents while interested in the education of their own children are less willing to become involved more generally in the running of schools. It is important to recognise too that for many parents their interest in the school is short term for the period their children attend, and that others, for example the local community, have a significant ongoing interest in schools.

We welcome and understand the wish of the Government to ensure that less advantaged parents are better able to use the system to achieve admission to the school of their choice, for example through the provision of 'choice' advisers. However the proposals to give more choice and free transport to parents in receipt of benefits are complex and impractical in rural areas, expensive, and likely to be unpopular with those parents denied a place in their local school as a result.

7. Discipline

While it is important to state that in the vast majority of classrooms there is good order and pupils behave well, behaviour is a major concern for schools. The Authority welcomes many of the proposals in relation to discipline and the management of exclusions. Indeed in Warwickshire Area Behaviour Panels are already in place to allow schools collectively to manage excluded pupils and pupils at risk of exclusion. We do have concerns, however, about the expectation placed on parents that they will take responsibility for their children for the first five days of an exclusion with the possibility of fines for parents who fail to do so. Such an approach could have a significant impact on working parents and single parent families who may not be in a position to ensure such supervision.

8. The role of the Local Authority

As stated in section 4 above, the Authority welcomes the clarification of the role of the Local Authority, firstly as a commissioner of school provision, but this should not mean that the Authority cannot also be a provider (as is evidenced in Warwickshire by the successful arrangements to make early years provision). We believe that local authorities are best placed to manage the supply and demand of school places and have, therefore, reservations as outlined above about proposals for the expansion of popular schools and of sixth form provision.

We welcome the restatement of the role of the Local Authority as a champion and advocate for children, young people and their families. The Authority is in a unique position to promote partnerships with other agencies in the statutory and voluntary sectors to promote the educational achievement and well-being of children and young

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people. That role underpins the Authority's role in co-ordinating admissions and exclusions, in ensuring the supply of school places, in co-ordinating and promoting extended services and in intervening effectively and decisively in schools which are failing to provide an acceptable standard of education for its pupils.

In relation to this last point, this Authority has had experience recently of the need to intervene in schools causing concern. Our experience suggests that schools are most likely to get into difficulties where there is weak leadership combined with poor governance, and where schools distance themselves from the Local Authority. It will be important to ensure that, in the context of greater autonomy for schools and of the New Relationship with Schools with its emphasis on self-evaluation supported by School Improvement Partners (including serving headteachers rather than Local Authority personnel), there is clear accountability for standards and that powers of intervention apply to all schools.

9. Every Child Matters

As a general point the Authority is also concerned that the White Paper makes little reference to the outcomes contained in 'Every Child Matters' and indeed there is an uneasy relationship between some of the proposals in this paper and 'Every Child Matters'. The White Paper appears disjointed and misses opportunities to engage schools specifically in integrated children's services and to promote the development of extended services. There are some issues highlighted elsewhere by Government which are not referred to in the White Paper, for example the education of Looked-After Children.

In summary, there is much to commend in the White Paper and the Authority would support many of the proposals contained within it. There are, however, concerns in a number of areas particularly in relation to freedom for schools which could potentially have unintended consequences and operate against the interests of children and young people in the area as a whole. This could distract from the Government's and our own key agenda of raising standards and better meeting the needs of individual children, their families and the community.

Yours sincerely,

Marion Davis
Strategic Director for Children,
Young People and Families

Eric Wood
County Education Officer