

**Children and Young People Committee  
School Standards and Organisation (Wales) Bill  
SSO1 – Response from Phil McTague, Headteacher, Eirias High School,  
Conwy**

**Consultation Questions General**

1. Is there a need for a Bill to make provision about school standards and school organisation? Please explain your answer.

Yes this needs clarification in light of comparative performance data

2. Do you think the Bill, as drafted, delivers the stated objectives as set out in the Explanatory Memorandum? Please explain your answer.

In part – see responses listed under 3 below.

3. What are your views on each of the main parts of the Bill—  
Part 1 – Introduction (section 1)

Clarifies main issues

Part 2 – Standards (sections 2–37) (see pages 9–17, 92–99 of the Explanatory Memorandum)

The use of banding as a determinant is of concern as there is an acceptance that KS2 results are not reliable enough for Primary banding and yet they are being used as the basis to measure value added in the secondary sector.

Part 3 – School Organisation (sections 38–84) (see pages 17–21, 99–106 of the Explanatory Memorandum)

Too much emphasis on tertiary sixth forms as being the only solution. There does not appear to be any framework attached to the standards required to lead a federation – what qualifies someone to be an executive principal?

Part 4 – Welsh in Education Strategic Plans (sections 85–88) (see pages 21–25, 106–107 of the Explanatory Memorandum)

Part 5 – Miscellaneous School Functions (sections 89 – 97) (see pages 25–31, 107–109 of the Explanatory Memorandum)

The trigger for calling a meeting of governors and parents at 30 does not reflect that this could be as low as 1.5% to 2% in some of our larger schools. As there potentially could be up to three meetings request per year this may prove disproportionate.

Part 6 – General (sections 98–102) (see pages 109–110 of the Explanatory Memorandum)

4. What are the potential barriers to implementing the provisions of the Bill (if any) and does the Bill take account of them?

Banding and CDS data not robust enough and not linked to Estyn.

### **Powers to make subordinate legislation**

5. What are your views on powers in the Bill for Welsh Ministers to make subordinate legislation (i.e. statutory instruments, including regulations, orders and directions)? In answering this question, you may wish to consider Part 1, Section 5 of the Explanatory Memorandum, which contains a table summarising the powers delegated to Welsh Ministers in the Bill to make orders and regulations, etc.

### **Financial Implications**

6. What are your views on the financial implications of the Bill?

Under resourced.

In answering this question you may wish to consider Part 2 of the Explanatory Memorandum (the Regulatory Impact Assessment), which estimates the costs and benefits of implementation of the Bill.

### **Other comments**

7. Are there any other comments you wish to make about specific sections of the Bill?