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Date: 3rd December 2014

Dear Sir/Madam,

A meeting of the **Cabinet** will be held in the **Sirhowy Room, Penallta House, Tredomen, Ystrad Mynach** on **Wednesday, 10th December, 2014** at **2.00 pm** to consider the matters contained in the following agenda.

Yours faithfully,

A handwritten signature in blue ink that reads 'Chris Burns'.

Chris Burns
INTERIM CHIEF EXECUTIVE

A G E N D A

- 1 To receive apologies for absence.
- 2 Declarations of Interest.
Councillors and Officers are reminded of their personal responsibility to declare any personal and/or prejudicial interest(s) in respect of any item of business on the agenda in accordance with the Local Government Act 2000, the Council's Constitution and the Code of Conduct for both Councillors and Officers.

To approve and sign the minutes of the following meeting: -

- 3 Cabinet held on 26th November 2014.

To receive and consider the following reports, which require an executive decision: -

- 4 Local Authority Arrangements to Support Safeguarding of Children.
- 5 Young People Not in Education, Employment or Training.

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- 6 Disposal of Land off Woodbine Road, Blackwood.
- 7 Cwmcarn High School.
- 8 The National Assistance Act 1948, as Amended - Removal of Persons in Care. Designation of Proper Officer.
- 9 Council Tax Base 2015-2016.
- 10 Write Off of Debts over £20,000 - NNDR Arrears for Ltd Companies.

To receive and consider the following report, which in the opinion of the Proper Officer may be discussed when the meeting is not open to the public and first to consider whether the public interest test requires that the meeting should be closed to the public for consideration of this item.

- 11 Write Off of Debts over £20,000 - NNDR Arrears.

Circulation:

Councillors Mrs C. Forehead, D.T. Hardacre, K. James, Mrs B. A. Jones, G. Jones, Mrs R. Passmore, D.V. Poole, K.V. Reynolds, T.J. Williams and R. Woodyatt,

All other Members not listed above.

And Appropriate Officers



CABINET

MINUTES OF THE MEETING HELD AT PENALLTA HOUSE, TREDOMEN ON WEDNESDAY, 26TH NOVEMBER 2014 AT 2.00 PM

PRESENT:

Councillor K.V. Reynolds - Leader

Councillors:

Mrs C. Forehead (HR and Governance/Business Manager), D.T. Hardacre (Performance and Asset Management), G. Jones (Deputy Leader and Cabinet Member for Housing), Mrs B. Jones (Deputy Leader and Cabinet Member for Corporate Services), K. James (Regeneration, Planning and Sustainable Development), Mrs R. Passmore (Education and Lifelong Learning), D.V. Poole (Community and Leisure Services), T.J. Williams (Highways, Transportation and Engineering), R. Woodyatt (Social Services).

Together with:

C. Burns (Interim Chief Executive), Mrs S. Aspinall (Acting Deputy Chief Executive), Mrs N. Scammell (Acting Director Corporate Services and S.151 Officer), Mr D. Street (Corporate Director Social Services).

Also in Attendance:

C. Jones (Head of Performance and Property), K. Williams (Private Sector Housing Manager), G. Hardacre (Head of Workforce and Organisational Development), R. Hartshorn (Head of Public Protection), K. Peters (Community Safety Manager), S.M. Kauczok (Committee Services Officer).

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

Councillor D. Hardacre declared an interest in agenda item 4 as his son lives in close proximity to the site. Mr G. Hardacre also declared an interest in agenda item 4 as he lives in close proximity to the site. Councillor D.V. Poole declared an interest in agenda item 5 in that he is a landlord.

3. CABINET

RESOLVED that the minutes of the meeting held on 12th November 2014 (minute nos. 1 - 11) be approved and signed as a correct record.

MATTERS ON WHICH EXECUTIVE DECISIONS WERE REQUIRED

4. LAND AT RIVERSIDE WALK, DERI

Having declared an interest in this matter at the beginning of the meeting, Councillor D. Hardacre and Mr G. Hardacre left the room during its consideration.

Members' approval was sought on the principle of disposing of land at Riverside Walk, Deri to United Welsh Housing Association (UWHA) on terms to be negotiated. The site is the former concrete works, Deri that was purchased and remediated by the Local Authority in April 1996. The site has been declared surplus to requirements and is currently held by Property Services, pending disposal. The development is intended to be tenure neutral, which will have no defined tenure for the units and will allow applicants to choose to rent or purchase an equity share in the properties as Low Cost Home Ownership to create a more sustainable community. There is a Welsh Government claw back on the land.

In the event that United Welsh is unable to proceed at market value (because its total cost of development, including land acquisition and build cost is limited by Welsh Government regulations), a further report will be brought forward setting out options for Members' consideration.

Following consideration and discussion, it was moved and seconded that the recommendations in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that for the reasons set out in the Officer's report: -

1. The land at Riverside Walk, Deri be sold to United Welsh Housing Association for the development of affordable housing on terms to be negotiated.
2. Approval of the detailed terms of the disposal be delegated to the Head of Performance and Property Services, for the purposes identified in the report but subject to Welsh Government approval in light of the claw back.

5. NATIONAL HOME IMPROVEMENT LOAN SCHEME

Having declared an interest in this matter at the beginning of the meeting, Councillor D.V. Poole left the room during its consideration.

The report was considered by the Policy and Resources Scrutiny Committee on 11th November 2014. The views of the Scrutiny Committee were reported to Cabinet.

Members were informed of a new initiative being launched by Welsh Government that will afford Welsh Local Authorities the opportunity to take advantage of a long-term loan scheme to fund interest free Home Improvement Loans to private sector house owners. Details were also received of changes to the funding mechanism for the current "Houses into Homes" scheme.

The new initiative, which will come into effect in January 2015, will offer interest-free loans to Local Authorities to provide a source of capital funding for those Authorities who wish to offer Home Improvement Loans to qualifying house owners. The loan to Local Authorities will be for a maximum 15 year period with Authorities making staged repayments in years 13-15. Research undertaken on similar loan products suggests that the potential repayment default is around 5%. Welsh Government have agreed that this risk can be shared between themselves and participating Authorities, with WG committed to funding 50% of any shortfall up to a maximum of 2.5% of the overall loan made to the Authority.

Following consideration and discussion, it was moved and seconded that the recommendations in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that for the reasons set out in the officer's report: -

1. The Home Improvement Loan scheme to form part of the Authority's Private Sector Housing Renewal Policy, as outlined in Option 2 of the report, be adopted.
2. The Houses into Homes scheme continue to be operated, utilising both the capital grant funding element and also the loan funded element offered by Welsh Government, as outlined in Option B of the report.

6. DRAFT DOMESTIC ABUSE, GENDER-BASED VIOLENCE AND SEXUAL VIOLENCE POLICY AND GUIDANCE FOR MANAGERS

The report, which outlined a revised Domestic Abuse Gender-based Violence and Sexual Violence Policy and Guidance Notes for Managers, was considered by the Policy and Resources Scrutiny Committee on 11th November 2014. The views of the Scrutiny Committee were reported to Cabinet.

According to the Corporate Alliance Against Domestic Violence, 75% of those experiencing domestic abuse are targeted at work. Under current legislation, the Council has legal responsibilities in promoting the welfare and safety of all employees. The Council's current Policy and Guidance Notes were introduced in July 2005 and require review and updating. The changes to the Policy and Guidance Notes include updated statistics, definitions and contact details of support available for employees and managers.

It was noted that the Council has recently been awarded the White Ribbon Status Award for organisations wishing to demonstrate their commitment to ending violent behaviour against women. The review of the policy will assist the Council in working towards the actions contained in the White Ribbon Campaign Award Action Plan. Members referred to their recent visit to the re-launch of the Multi Agency Centre in Ystrad Mynach, a one-stop shop for domestic violence victims with a number of support agencies working under one roof and complimented staff who work there on the professional manner in which they provide support to service users.

Following consideration and discussion, it was moved and seconded that the recommendation in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that for the reasons set out in the Officer's report, the revised Domestic Abuse, Gender-based Violence and Sexual Violence Policy and Guidance Notes be adopted.

7. DRAFT FLEXIBLE WORKING POLICY AND PROCEDURE

The report, which outlined an amendment to the Flexible Working Policy and Procedure, was considered by the Policy and Resources Scrutiny Committee on 11th November 2014. The views of the Scrutiny Committee were reported to Cabinet.

The report brings forward an amendment to the Flexible Working Policy and Procedure to clarify the length of time an employee can make a temporary change to their working pattern. The current arrangements have allowed employees to make a series of temporary changes over consecutive years resulting in employees working these revised patterns of work for many years.

The amended policy will still allow employees to work flexibly either on a permanent or temporary basis, the only change being that the temporary arrangements can last for a maximum of 12 months, after which the employee will revert to their previous working pattern. An employee can then, however, make a request for a permanent change to their working pattern.

Following consideration and discussion, it was moved and seconded that the recommendation in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that for the reasons set out in the Officer's report, the revised Flexible Working Policy and Procedure be adopted.

8. CABINET FORWARD WORK PROGRAMME

The report sought Members' approval of the updated Cabinet Forward Work Programme for the period December 2014 to February 2015.

Following consideration and discussion, during which it was pointed out that Councillor G. Hardacre on page 2 of the appendix to the report should read Councillor D. Hardacre, it was moved and seconded that the recommendation in the report be approved. By a show of hands this was unanimously agreed.

RESOLVED that for the reasons set out in the Officer's report, the Cabinet Forward Work Programme for the period December 2014 to February 2015, be approved subject to Cllr G. Hardacre being amended to read Cllr D. Hardacre on page 2 of the appendix to the report.

RECOMMENDATION TO COUNCIL

9. ANTI SOCIAL BEHAVIOUR, CRIME AND POLICING ACT 2014 - AMENDMENT TO AUTHORISATION OF OFFICERS

The report informed Members of required changes to legal powers arising from the Anti-Social Behaviour Crime and Policing Act 2014. Officers within the Public Protection Division, Housing Services and Community and Leisure Services require additional authorisation under the Anti-Social Behaviour, Crime and Policing Act 2014 in order to be able to enforce new legislative provisions to deal with anti-social behaviour that came into force on 20th October 2014.

The Act provides a new range of powers to tackle anti-social behaviour affecting communities and the ability of members of the public to enjoy public spaces through two new tools with enforcement responsibilities, Community Protection Notices and Public Space Protection Orders. There are a range of new provisions under the Act, however, the report deals with three areas only viz. Community Protection Notices - issue and fixed penalty notices; Public Space Protection Orders - enforcement and fixed penalty notices and Closure Notices/Orders - level of designation.

Community Protection Notices (CPNs) can be issued by authorised local authority staff, police officers and registered social landlords (if designated by the local authority). It was noted, however, that as yet no registered social landlords have requested designation and Members wondered whether this was a cause for concern.

Following consideration and discussion, it was moved and seconded that the recommendations in the report be approved. By a show of hands this was unanimously agreed.

RECOMMENDED that for the reasons contained in the officer's report: -

1. The implementation of this legislation be noted and the recommended changes to the Council's Constitution be referred to Council for determination. The Council's Monitoring Officer make the necessary amendments to the Council's Constitution.
2. The Council's Constitution and Terms of Reference be amended by adding the following: -

Anti-Social Behaviour, Crime and Policing Act 2014.

The meeting closed at 2.38 pm.

Approved and signed as a correct record subject to any corrections made at the meeting held on 10th December 2014.

CHAIR

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CABINET- 10TH DECEMBER 2014

SUBJECT: LOCAL AUTHORITY ARRANGEMENTS TO SUPPORT SAFEGUARDING OF CHILDREN

REPORT BY: CORPORATE DIRECTOR SOCIAL SERVICES

1. PURPOSE OF REPORT

- 1.1 The Auditor General for Wales, as part of the programme of works for the year 2014-15 has issued (October 2014) the findings of his review into the local authority arrangements to support the safeguarding of children.

2. SUMMARY

- 2.1 In the period March to May 2014 the Wales Audit Office completed a review of Caerphilly County Borough Council's (the Council) assurance and accountability arrangements for ensuring that safeguarding policies and procedures are in place and are being adhered to.
- 2.2 This report summarises the conclusions and recommendations of this review and explains how the actions will be implemented and monitored.

3. LINKS TO STRATEGY

- 3.1 Safeguarding of Children is a key Statutory Duty of the local authority.

4. THE REPORT

- 4.1 The WAO study focused on: Does the Council's governance and management arrangements provide assurance that children are safeguarded?

The main questions that the review sought to answer were:

- Are there clear governance, accountability and management arrangements for overseeing whether the Council is meeting its safeguarding responsibilities to children?
- Is the Council monitoring and evaluating appropriate information, which provides assurance that it is meeting its safeguarding responsibilities to children?
- Are assurance systems operating effectively

- 4.2 The report concludes that,

- The governance, accountability and management arrangements for overseeing whether the Council is meeting its safeguarding responsibilities to children have some weaknesses which the Council is

addressing.

- The Council's arrangements for monitoring and evaluating its safeguarding responsibilities to children have some weaknesses which the Council must address.
- The Council's approach to identifying and acting on improvements in its safeguarding arrangements has some weaknesses which the Council is addressing.

4.3 Members should note that the report does not identify any weaknesses in the safeguarding of children, the recommendations relate to the governance of those arrangements.

4.4 Following on from the conclusions referred to in paragraph 4.2, the report makes five proposals for improvement. These are,

P1 - Develop a Corporate Safeguarding Policy that clearly specifies roles, responsibilities and procedures for safeguarding.

P2 - The Council should clarify who designated officers with responsibility for safeguarding are.

P3 - Improve the range, quality and coverage of safeguarding performance reporting to members to provide adequate assurance that corporate arrangements are working effectively.

P4 - Ensure all elected members and staff who come into contact with children on a regular basis receive training on safeguarding and child protection issues and the Council's corporate policy on safeguarding. This should also include volunteers.

P5 - Identify and agree an appropriate internal audit programme of work for safeguarding.

4.5 A small group of officers is currently finalising the action plan that will ensure all five of the recommendations are acted upon and that the improvements required will be delivered upon. Progress against the action plan will be reported to Audit Committee on a quarterly basis.

5. EQUALITIES IMPLICATIONS

5.1 This report requires no specific equalities impact assessment.

6. FINANCIAL IMPLICATIONS

6.1 There are no financial implications associated with this report

7. PERSONNEL IMPLICATIONS

7.1 There are no personnel implications associated with this report

8. CONSULTATIONS

8.1 There are no consultees that have not been included in the overall report.

9. RECOMMENDATIONS

9.1 That Cabinet note the conclusions and recommendations contained in the WAO study.

- 9.2 That Cabinet accept the five recommendations made in the study.
- 9.3 That Cabinet agree that progress against the action plan is monitored by Audit Committee on a quarterly basis.

10. REASONS FOR THE RECOMMENDATIONS

- 10.1 Compliance with the recommendations from the Wales Audit Office study will further strengthen the authority's arrangements for the safeguarding of children.

11. STATUTORY POWER

- 11.1 Local Government Act 2000,

Author: Dave Street, Corporate Director Social Services

Consultees:

Chris Burns, Interim Chief Executive

Nicole Scammell, Acting Director of Corporate Services

Sandra Aspinall, Acting Deputy Chief Executive

Gareth Jenkins, Assistant Director Children's Services

Appendix One : Wales Audit Office: Local Authority arrangements to support the safeguarding of children.

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Local Authority Arrangements to Support Safeguarding of Children

Caerphilly County Borough Council

Audit year: 2014-15

Issued: October 2014

Document reference: 331A2014

Status of report

This document has been prepared for the internal use of Caerphilly County Borough Council as part of work performed in accordance with the statutory functions.

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In the event of receiving a request for information to which this document may be relevant, attention is drawn to the Code of Practice issued under section 45 of the Freedom of Information Act 2000. The section 45 Code sets out the practice in the handling of requests that is expected of public authorities, including consultation with relevant third parties. In relation to this document, the Auditor General for Wales, the Wales Audit Office and, where applicable, the appointed auditor are relevant third parties. Any enquiries regarding disclosure or re-use of this document should be sent to the Wales Audit Office at infoofficer@wao.gov.uk.

The team who delivered the work was Lynn Pamment, Sara-Jane Byrne and Osian Lloyd from PwC.

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Summary report

Background

1. The safeguarding of children is everyone's responsibility. Local authorities have a statutory duty to have in place safeguarding arrangements which include strategic planning, support and guidance for all providers of relevant services in its area, and the direct provision of some services itself. In particular, local authorities have a duty to work in partnership with others to secure the safeguarding and wellbeing of children in their area, including the Local Safeguarding Children Board.
2. Employees and volunteers who work with children have specific safeguarding duties and responsibilities. Local authorities and schools must ensure through their Human Resources (HR) and personnel arrangements that adequate checks are in place to ensure that employees and volunteers are of good character and that their working practices are managed and monitored. Local authorities must also ensure that there are processes in place to investigate and record safeguarding allegations made against staff, teachers and support staff, and volunteers.
3. Members, chief executives and senior managers need to ensure that they have proper oversight of the safeguarding arrangements that are in place across the authority. They should actively seek and gain assurance that arrangements are operating effectively, as without this they will be unable to demonstrate that they have discharged their statutory obligation in respect of safeguarding.
4. During the period March to May 2014, the Wales Audit Office completed a review of Caerphilly County Borough Council's (the Council) assurance and accountability arrangements for ensuring that safeguarding policies and procedures are in place and are being adhered to. The study examined what the Council itself has done to seek assurance that its arrangements to support safeguarding are effective by reviewing how the Council is discharging its safeguarding responsibilities at all levels: Cabinet, Senior Management Team, Scrutiny and individual officers.
5. The study focused on answering the following: **Does the Council's governance and management arrangements provide assurance that children are safeguarded?**
The main questions that the review sought to answer were:
 - Are there clear governance, accountability and management arrangements for overseeing whether the Council is meeting its safeguarding responsibilities to children?
 - Is the Council monitoring and evaluating appropriate information, which provides assurance that it is meeting its safeguarding responsibilities to children?
 - Are assurance systems operating effectively?

Review findings and conclusions

6. We examined policies relevant to safeguarding; reports to Council, Cabinet and Scrutiny; and set out below our conclusions based on the extent to which the Council has put in place, and is operating, effective management and assurance processes and controls for safeguarding. As part of this study we made available an online survey for elected members, senior managers, education, schools and leisure staff to test the Council's arrangements for safeguarding. Surveying is valuable because it provides an insight into the Council from the perspective of the people who make decisions and do the work. It also allows us to determine what the relative strengths or weaknesses of local safeguarding arrangements are and identify where councils can make improvements. The detailed survey findings for the Council are set out in [Appendix 1](#), although we include headline conclusions where relevant in each of the following sections.

The governance, accountability and management arrangements for overseeing whether the Council is meeting its safeguarding responsibilities to children have some weaknesses which the Council is addressing

7. The Assistant Director of Children's Services represents the Council on the South East Wales Safeguarding Children's Board (SEWSCB) and disseminates key information to senior officers through relevant forums such as team meetings including the Senior Management Team and the Divisional Management Team. The SEWSCB covers the five Gwent councils and was set up in April 2013. The SEWSCB is a multi-agency partnership comprising of representatives from Gwent Police, Social Services and Education Directorates from the five councils, the Voluntary Sector, Youth Offending Services, the All Wales Probation Trust, CAF/CASS Cymru, Housing, Public Health Wales and Aneurin Bevan Health Board. The purpose of SEWSCB is to ensure safeguarding children remains high on the agenda across the region.
8. The SEWSCB is the key body for overseeing safeguarding and child protection policy development. The Council also has its own Learning and Review Group, which is a multi-agency group involving practitioners, police, probation and representatives from head teachers of secondary and primary schools. The Safeguarding Manager in Education also attends the group as a representative of the Directorate of Education and Life Long Learning. The group meets monthly and undertakes themed audits of case files. There is also a Corporate Parenting Board in place which meets quarterly. Membership includes representatives from Social Services, Education, Housing, the Aneurin Bevan Health Board, community safety, foster care, and youth services as well as elected members.

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9. Both Estyn and the Care and Social Services Inspectorate Wales (CSSIW) have been positive about the Council's safeguarding arrangements. The CSSIW's annual review and evaluation of performance 2012-13 stated:

'The performance in children's safeguarding remains within the upper quartile of councils in Wales although the percentage of conferences and core group meetings held within timescales has decreased slightly. The council is a member of the regional safeguarding board and reports that early review has secured change/improvement within some of the subgroups supporting this. The impact of shared arrangements is an area which all members will need to monitor locally as part of the overall governance of the regional arrangement.

Close links are maintained between children's services and education including co-location of safeguarding and working with the team around the family. There is corporate commitment for looked after children, which includes additional funding for educational support.'

10. Estyn noted in its inspection in 2012: 'The authority has clear policy and procedures for safeguarding children and young people. There are effective systems to ensure all education staff are CRB checked, and receive appropriate safeguarding training.'
11. However, the Council does not have a corporate safeguarding policy and uses the All Wales Children Protection Procedures. The lack of a specific local policy to underpin local decision making is a weakness. A separate safeguarding policy is in place for the Education and Life Long Learning Directorate which identifies named officers within this Directorate, but also emphasises the importance of liaising with Social Services.
12. Whilst there is a good working relationship between Social Services and Education staff, the Council lacks a corporate safeguarding policy and the Council has not identified appropriate leads in other services for safeguarding. It is assumed that all members of staff are aware of whom they should raise any issues or concerns with; however, there are no corporate documents specifying who this would be. This weakens corporate accountability and assurance arrangements.
13. There is no written accountability framework in place specifically for safeguarding. Safeguarding is viewed as everyone's responsibility and accountability is reinforced through the Council's standard performance management arrangements including departmental management team meetings, scrutiny, one-to-one appraisals and supervisions. Statutory responsibility lies with the Director of Social Services although the Assistant Director of Children's Services is considered to hold the overall responsibility. However, this is not articulated formally within a corporate policy. Our survey found that 72 per cent of respondents stated they know who the Council's Designated Officer for Child Protection is, higher than our survey average of 67 per cent.

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14. Similarly, there is no lead cabinet member with specific responsibility for safeguarding, although the Cabinet Member for Social Services is recognised by many as holding these responsibilities. This is supported by our survey results which found that only 41 per cent of respondents stated they know who is the Council's lead Councillor for Child Protection, below our survey average of 44 per cent. Indeed, we found that safeguarding is not included in member role descriptions even though the Council is clear that safeguarding is everyone's responsibility. The role description for the Cabinet Member for Social Services identifies this member as being the Child Poverty champion.
 15. Each Service Improvement Plan includes an Equalities Improvement and Monitoring Form which specifically highlights the requirement to consider the safeguarding of children. The Council has a number of related improvement objectives including: 'Ensure children and young people who are looked after are supported to achieve their full potential.' There is regular monitoring of progress against these improvement objectives and specific action plans for each improvement objective have been developed.
 16. The Council has a Corporate Risk Register but no specific risks relating to safeguarding are identified as the risk level for safeguarding is currently considered to be low. Estyn and CSSIW inspections, and other Council reviews have not identified any inherent risks relating to safeguarding. Mechanisms are in place to escalate risks for inclusion in the Corporate Risk Register when necessary. Risks are identified and documented in the Service Improvement Plans and directorate risk registers are currently being developed. However, the Corporate Governance Inspection found that risk management was not successfully embedded across the organisation. A specific recommendation around strengthening risk management was raised and the Council has been taking steps to address this.
 17. Risks are also identified through the various SEWSCB subgroups, such as the Case Review and Practice Development Group, and the Local Learning and Review Group, and actions are identified and implemented to mitigate these risks.

The Council's arrangements for monitoring and evaluating its safeguarding responsibilities to children have some weaknesses which the Council must address

18. A Ffynnon scorecard is produced to report performance against a large number of Children's Services indicators including 10 national and two local safeguarding-related performance indicators. Performance against the key national indicators shows that the Council is performing well.
19. There are no indicators on corporate measures, such as training and recruitment checks. The scorecard is reported to the Directorate Management Team and Senior Management Team on a monthly basis; the Corporate Management Team quarterly; and the Health, Social and Wellbeing Scrutiny Committee mid-year and at the year-end.
20. There is a mechanism in place to report to Scrutiny (Health, Social Care and Wellbeing, and Education For Life), Cabinet and Council. There have been no reports presented to these committees specifically on safeguarding, although some other related areas have been subject to scrutiny including Child Neglect (September 2013), Child Sexual Exploitation (June 2013), and Integrated Family Support Services (June 2013). Scrutiny committees also receive updates against relevant improvement objectives every six months. Reporting to committees with regard to safeguarding is therefore limited.
21. Key HR policies have not been updated to reflect key changes in legislation, such as the Disclosure and Barring Services, and there have been no formal reports to members on recent legislative changes which impact on the work of the Council. For example, the Council's recruitment policy is dated 2004. We understand this is now being reviewed. Council HR staff stated that some procedures have been updated such as a safer recruitment policy to schools which was updated in 2012. Systems are in place to ensure checks and balances are undertaken and we were advised that HR does not register new starters on the payroll until all appropriate checks have been undertaken.
22. Our survey found that 98 per cent of respondents in Caerphilly are clear how their job contributes to safeguarding and protecting children and young people, higher than our survey average of 95 per cent. In addition, 86 per cent stated that their responsibilities for safeguarding and protecting children and young people were explained to them when they started in their current role in the Council/school, compared with the Welsh survey average of 75 per cent.

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- 23.** In both the Social Services and Education and Life Long Learning Directorates, there is a clear audit trail of all training courses and attendees along with feedback forms to help identify other areas where further training may be required. There is a database which records who attends each training course and when they are required to attend a refresher course. However, mandated training on safeguarding is not provided to other services. Members interviewed felt that they had been made aware of safeguarding but acknowledged that no specific training has been provided. Safeguarding is not part of the member induction. The Council has no assurance that elected members are adequately trained and supported to deliver this important role. The Council is above the survey average for the number of people who have received training on safeguarding in the last six months – 39 per cent compared with 32 per cent – but has fewer people who have never received safeguarding training, one per cent compared with the all-Wales average of 10 per cent.

The Council's approach to identifying and acting on improvements in its safeguarding arrangements has some weaknesses which the Council is addressing

- 24.** Mandatory training on data protection is undertaken by staff annually. In addition, mandatory Protecting Information e-learning was launched last year and PC users will be asked to repeat the training annually. Face-to-face training on data protection has also been delivered to a wide cross-section of staff and the Council's Information Unit has also attended a number of team briefings to raise awareness of data protection.
- 25.** A report on the outcome of the schools' audits has also been presented to Scrutiny. Safeguarding is a key element of the audit. A Scrutiny Improvement Action Plan has been developed and is an integral part of the Council's improving governance programme. Changes are currently being made.
- 26.** There are a number of examples where the Council has improved its arrangements regarding children's safeguarding and mechanisms are in place to keep these arrangements up to date. Lessons are learned from a variety of forums including the SEWSCB Case Review and Practice Development Group, as well as the Caerphilly Learning and Reviewing Group. Areas where policies and processes have been improved include the use of social media and transferring records. The Gwent Children Missing Project has also identified good practice within education in the Council and is in the process of replicating this across the South East Wales region.
- 27.** The Education and Life Long Learning and Social Services Directorates have also completed separate Section 28 Children's Act Safeguarding audits and submitted these to the SEWSCB Business Manager for review and quality assurance. However, no assessment of corporate arrangements has been completed.

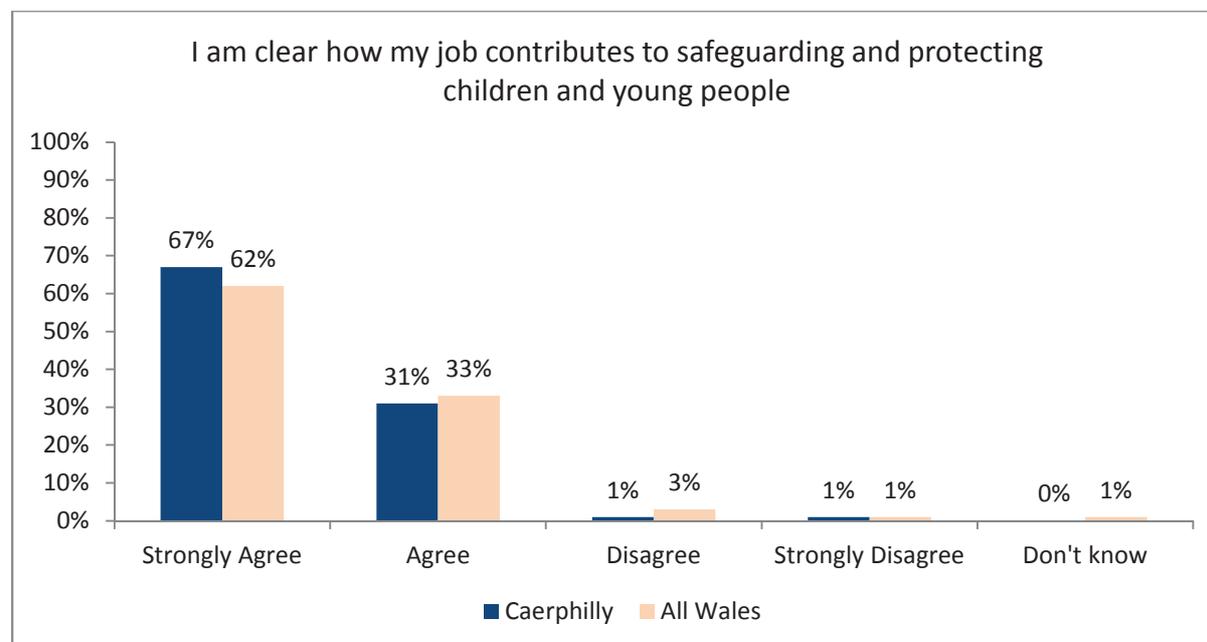
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28. The Information Risk Management Policy has led to the development of Information Risk Registers by all service areas which focus heavily on data protection. The Council has also undertaken a data-mapping exercise to ensure that there are effective controls in place to protect sensitive and confidential information. This is reported to the Policy and Resources Scrutiny Committee.
29. No internal audit or scrutiny reviews on safeguarding have been undertaken in the last five years.

Proposals for improvement

P1	Develop a Corporate Safeguarding Policy that clearly specifies roles, responsibilities and procedures for safeguarding.
P2	The Council should clarify who designated officers with responsibility for safeguarding are.
P3	Improve the range, quality and coverage of safeguarding performance reporting to members to provide adequate assurance that corporate arrangements are working effectively.
P4	Ensure all elected members and staff who come into contact with children on a regular basis receive training on safeguarding and child protection issues and the Council's corporate policy on safeguarding. This should also include volunteers.
P5	Identify and agree an appropriate internal audit programme of work for safeguarding.

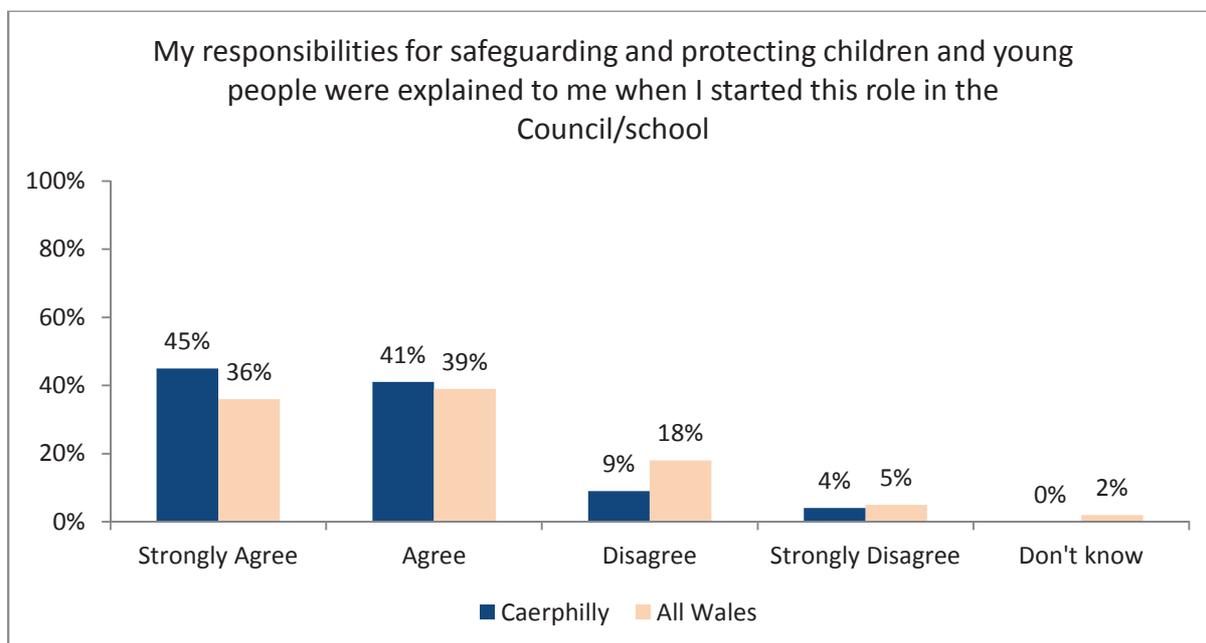
Appendix 1

Summary of survey findings



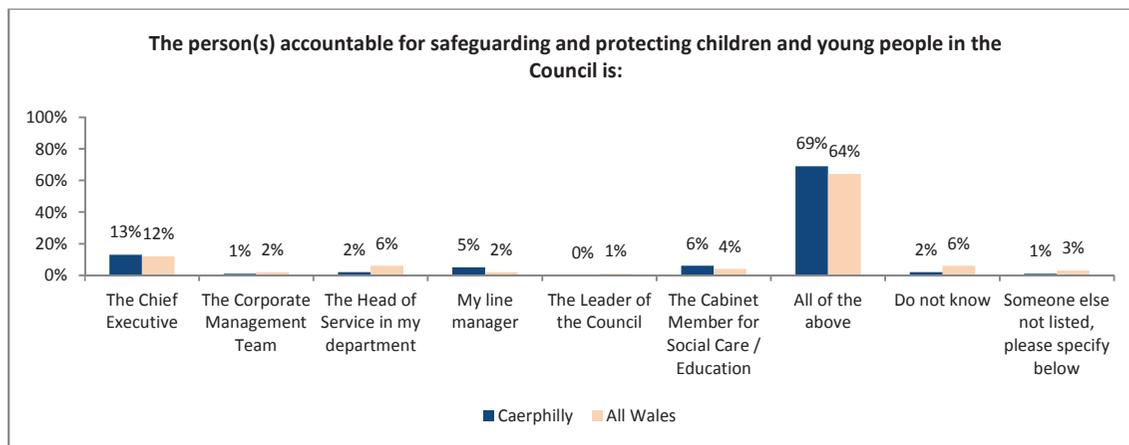
	Total	Not asked	No reply	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
Caerphilly	98	-	-	66	30	1	1	-
Expressed opinion*				67%	31%	1%	1%	
All Wales	1,996	-	6	1,235	664	53	12	26
Expressed opinion*				62%	33%	3%	1%	1%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



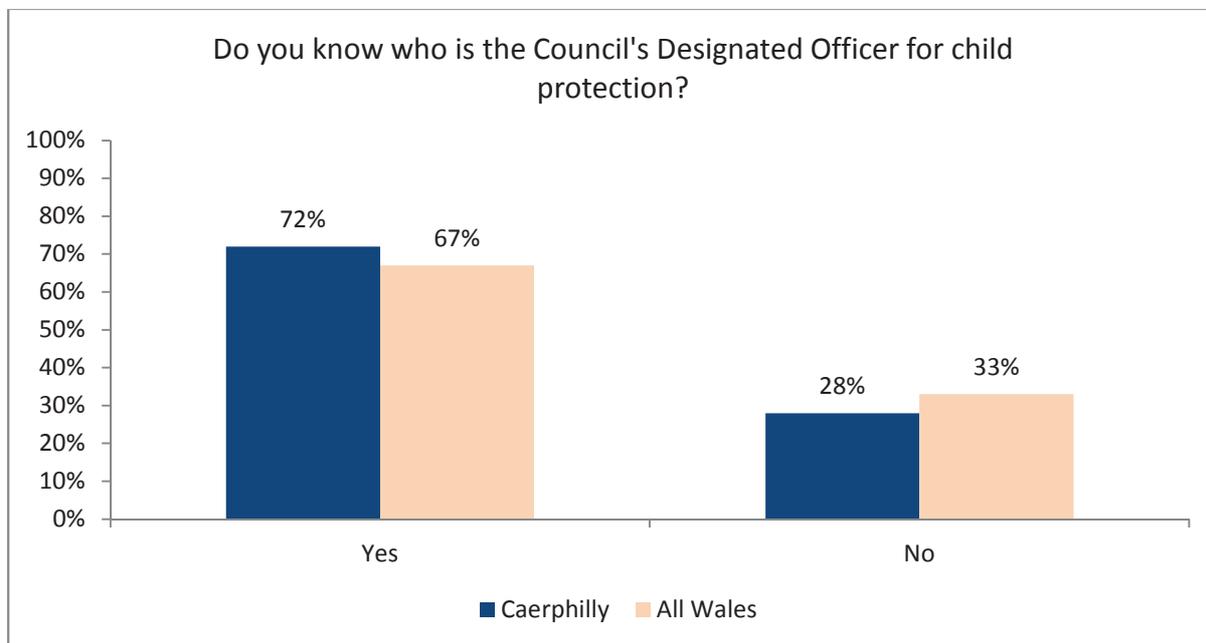
	Total	Not asked	No reply	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
Caerphilly	98	-	1	44	40	9	4	-
Expressed opinion*				45%	41%	9%	4%	
All Wales	1,996	-	10	716	773	358	104	35
Expressed opinion*				36%	39%	18%	5%	2%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



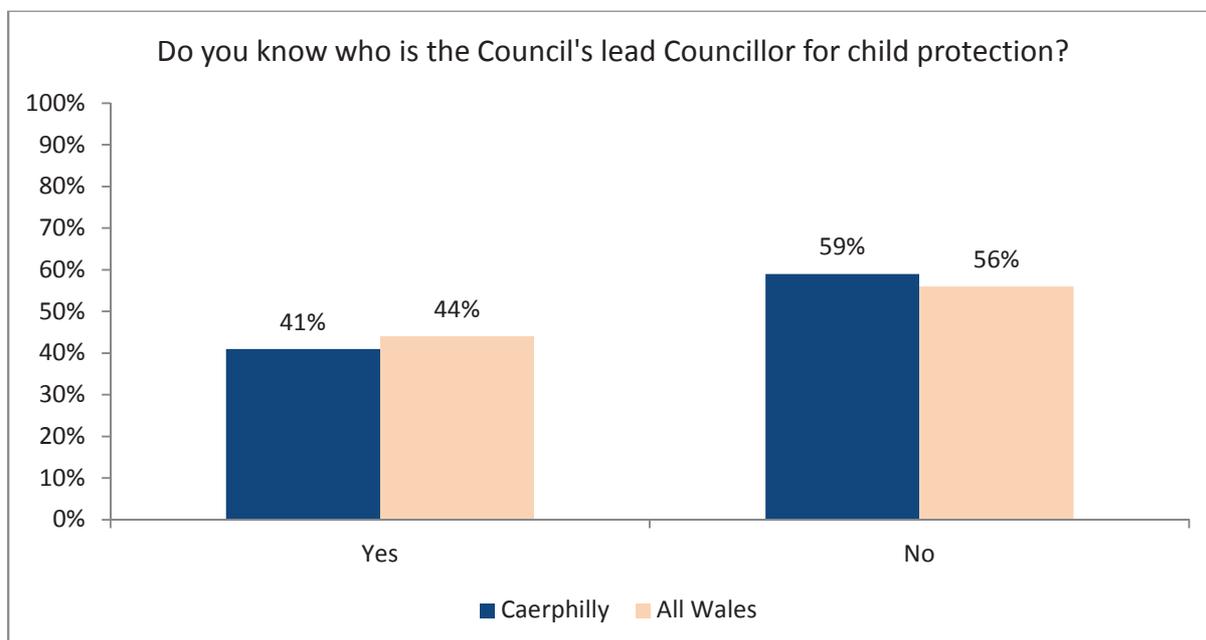
	Total	Not asked	No reply	The Chief Executive	The Corporate Management Team	The head of service in my department	My line manager	The leader of the Council	The Cabinet Member for Social Care/ Education	All of the above	Do not know	Someone else not listed, please specify below
Caerphilly	98	-	4	12	1	2	5	-	6	65	2	1
Expressed opinion*				13%	1%	2%	5%		6%	69%	2%	1%
All Wales	1,996	-	68	223	34	124	47	19	69	1,231	115	66
Expressed opinion*				12%	2%	6%	2%	1%	4%	64%	6%	3%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



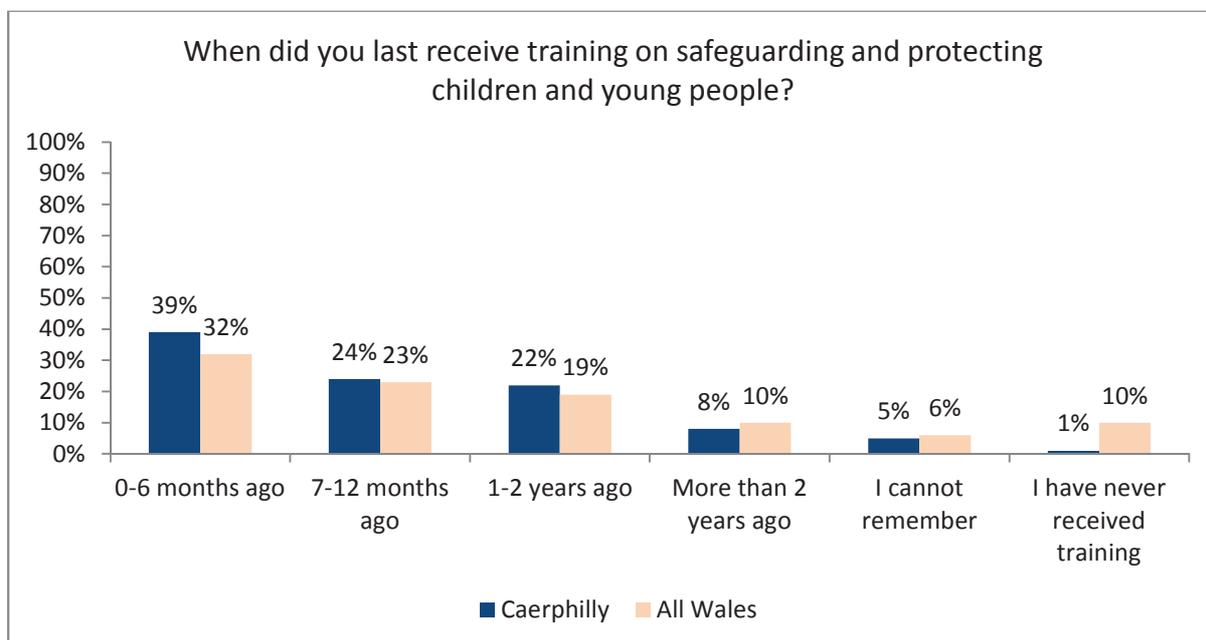
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Caerphilly	98	-	1	70	27
Expressed opinion*				72%	28%
All Wales	1,996	-	13	1,337	646
Expressed opinion*				67%	33%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



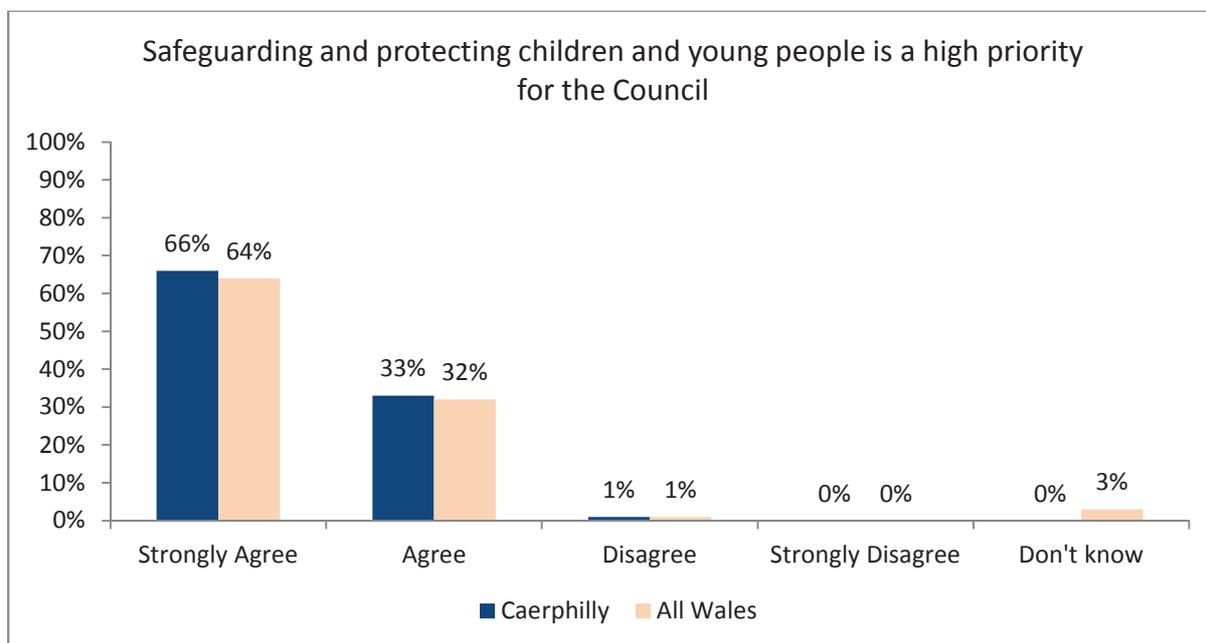
	Total	Not asked	No reply	Yes	No
Caerphilly	98	-	-	40	58
Expressed opinion*				41%	59%
All Wales	1,996	-	13	881	1,102
Expressed opinion*				44%	56%

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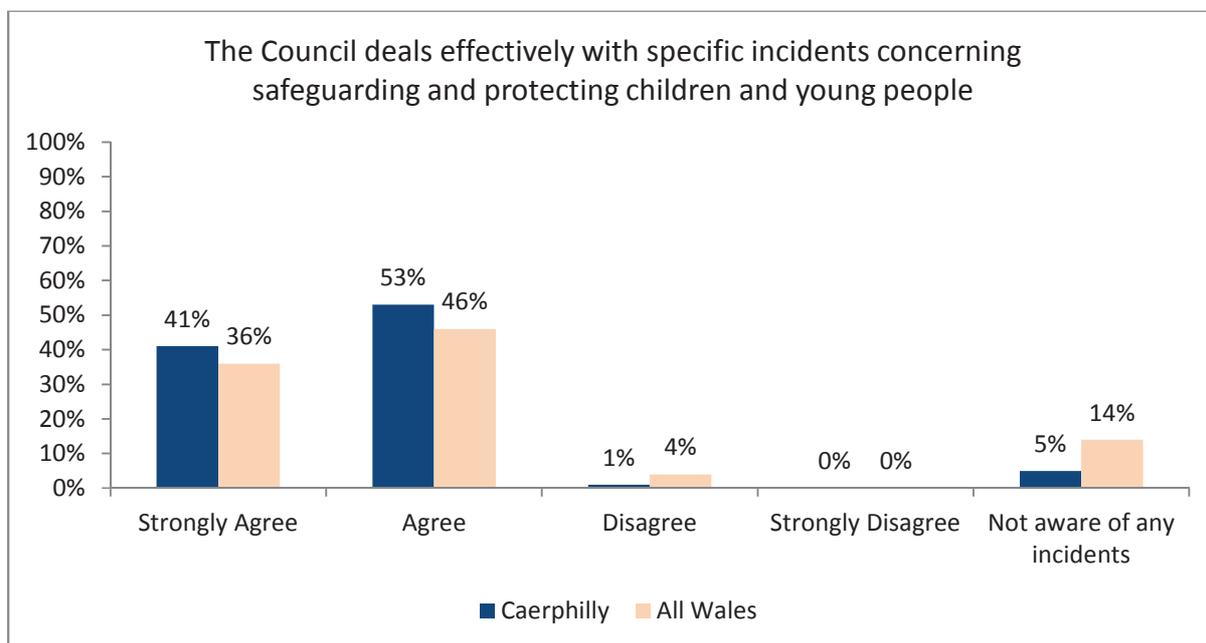
	Total	Not asked	No reply	0-6 months ago	7-12 months ago	1-2 years ago	More than 2 years ago	I cannot remember	I have never received training
Caerphilly	98	-	-	38	24	22	8	5	1
Expressed opinion*				39%	24%	22%	8%	5%	1%
All Wales	1,996	-	4	644	462	374	199	121	192
Expressed opinion*				32%	23%	19%	10%	6%	10%

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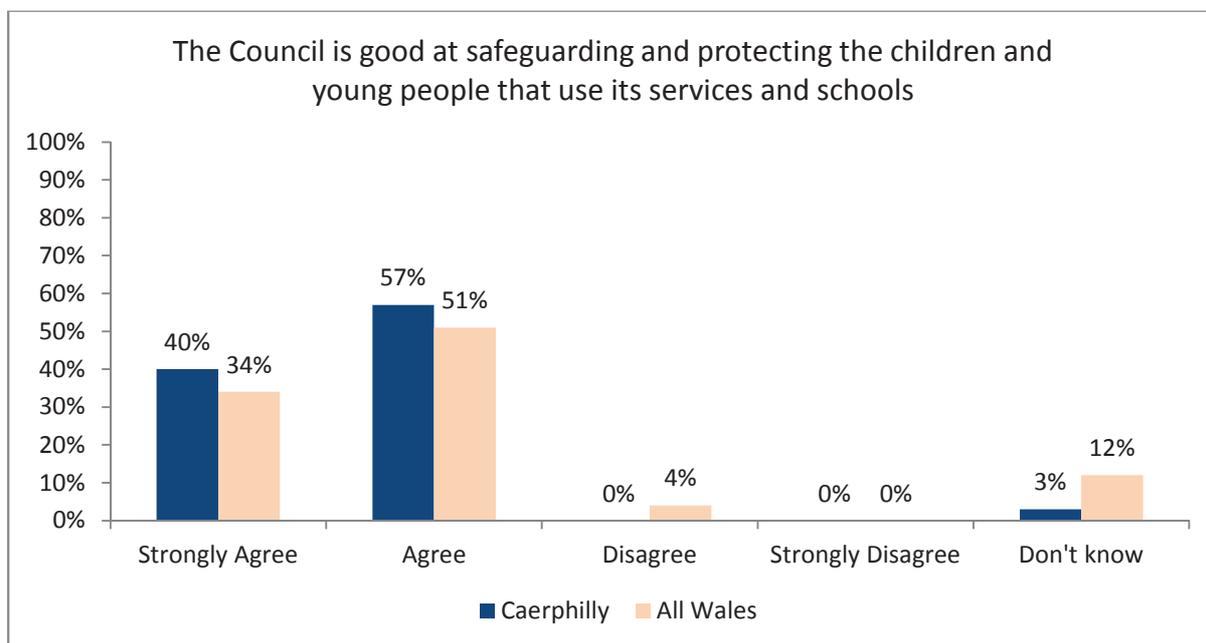
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Caerphilly	98	-	-	65	32	1	-	-
Expressed opinion*				66%	33%	1%		
All Wales	1,996	-	10	1,266	628	27	4	61
Expressed opinion*				64%	32%	1%	0%	3%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



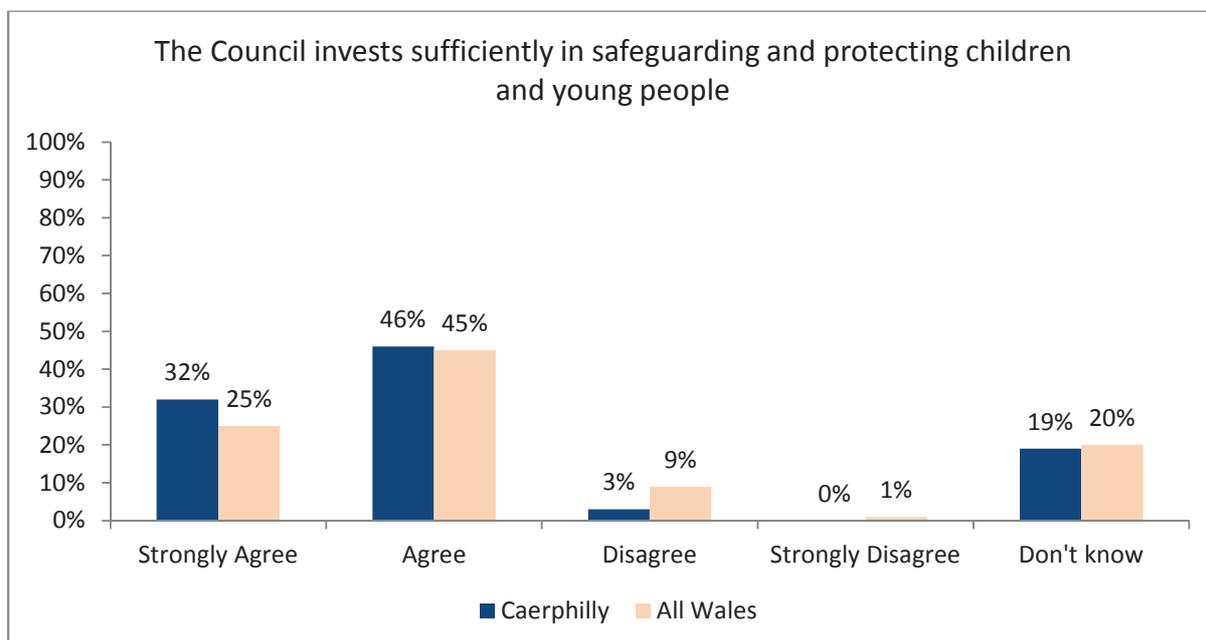
	Total	Not asked	No reply	Strongly agree	Agree	Disagree	Strongly disagree	Not aware of any incidents
Caerphilly	98	-	-	40	52	1	-	5
Expressed opinion*				41%	53%	1%		5%
All Wales	1,996	-	11	722	911	76	5	271
Expressed opinion*				36%	46%	4%	0%	14%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



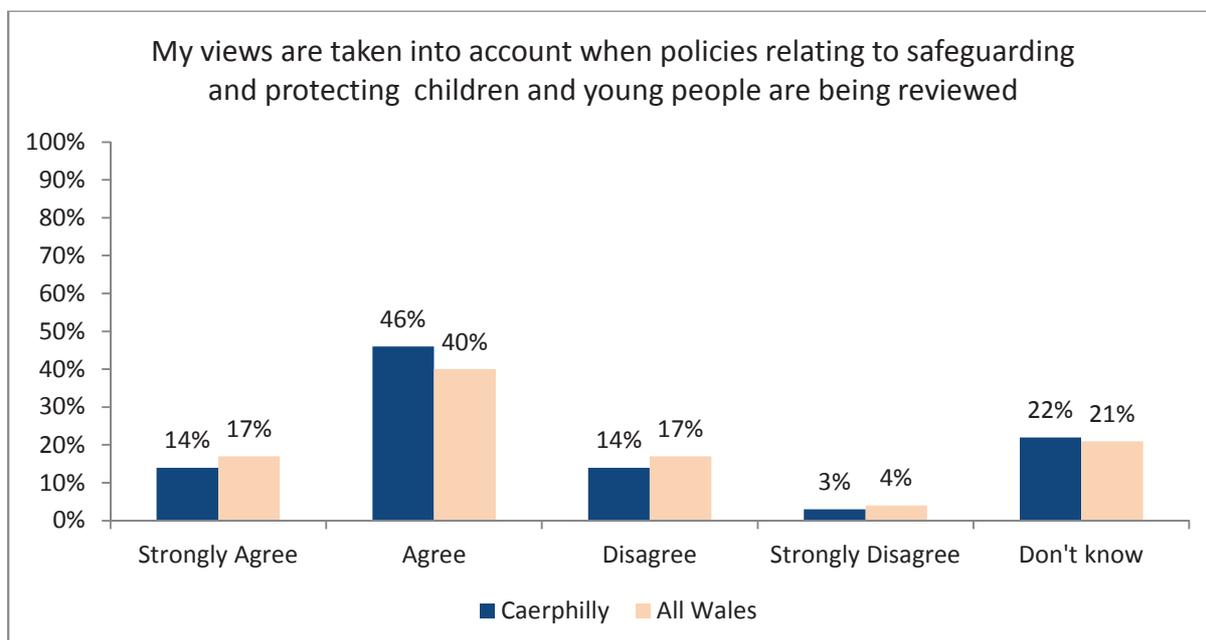
	Total	Not asked	No reply	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
Caerphilly	98	-	2	38	55	-	-	3
Expressed opinion*				40%	57%			3%
All Wales	1,996	-	20	665	1,000	74	3	234
Expressed opinion*				34%	51%	4%	0%	12%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



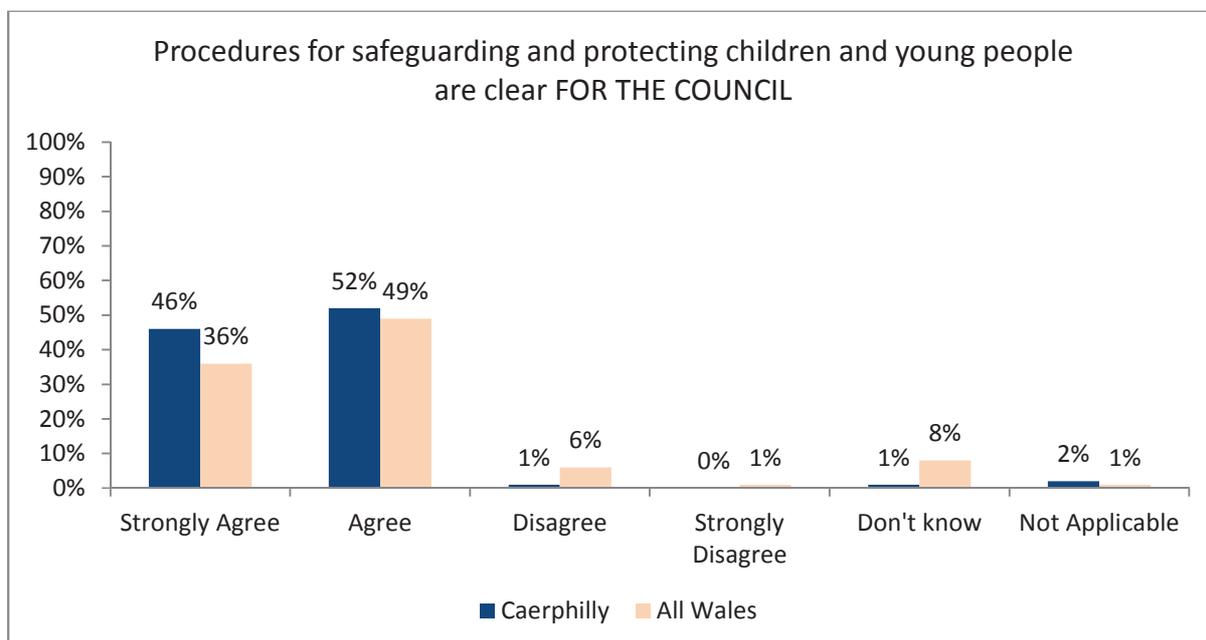
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Caerphilly	98	-	1	31	45	3	-	18
Expressed opinion*				32%	46%	3%		19%
All Wales	1,996	-	17	491	895	182	19	392
Expressed opinion*				25%	45%	9%	1%	20%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



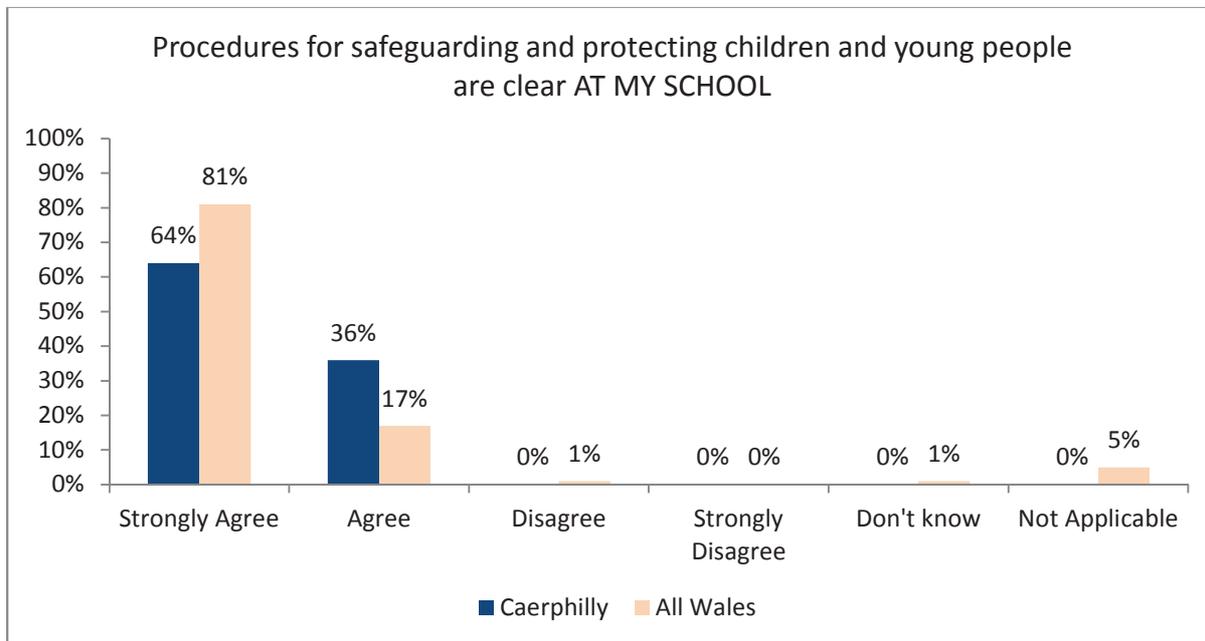
	Total	Not asked	No reply	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
Caerphilly	98	-	-	14	45	14	3	22
Expressed opinion*				14%	46%	14%	3%	22%
All Wales	1,996	-	20	344	794	339	79	420
Expressed opinion*				17%	40%	17%	4%	21%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



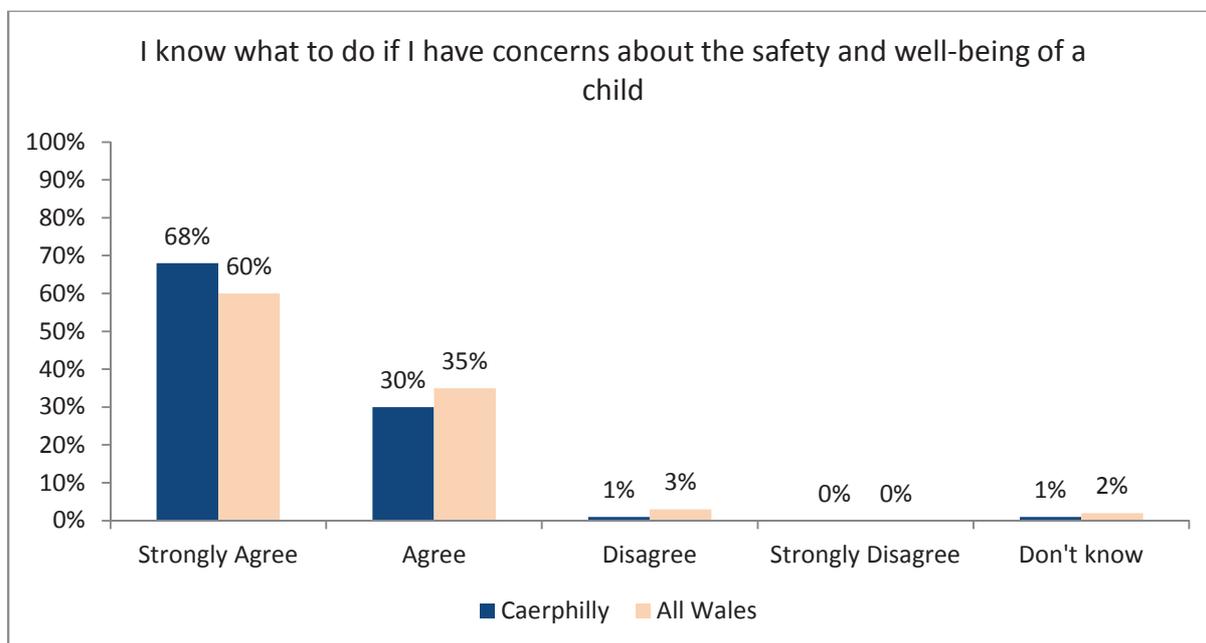
	Total	Not asked	No reply	Strongly agree	Agree	Disagree	Strongly disagree	Don't know	Not applicable
Caerphilly	98	-	1	44	49	1	-	1	2
Expressed opinion*				46%	52%	1%		1%	2%
All Wales	1,996	-	39	701	942	114	14	160	26
Expressed opinion*				36%	49%	6%	1%	8%	1%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



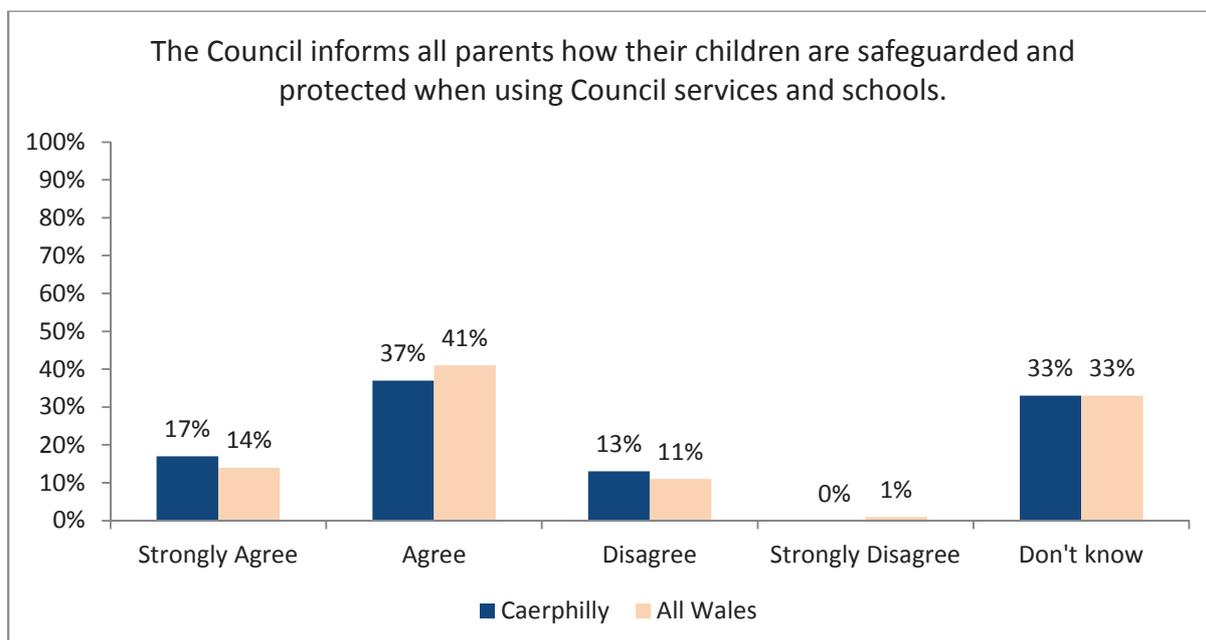
	Total	Not asked	No reply	Strongly agree	Agree	Disagree	Strongly disagree	Don't know	Not applicable
Caerphilly	98	76	-	14	8	-	-	-	-
Expressed opinion *				64%	36%				
All Wales	1,996	1,399	34	435	92	3	-	5	28
Expressed opinion *				81%	17%	1%		1%	5%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



	Total	Not asked	No reply	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
Caerphilly	98	-	1	66	29	1	-	1
Expressed opinion*				68%	30%	1%		1%
All Wales	1,996	-	29	1,174	683	64	8	38
Expressed opinion*				60%	35%	3%	0%	2%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.



	Total	Not asked	No reply	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
Caerphilly	98	-	4	16	35	12	-	31
Expressed opinion*				17%	37%	13%		33%
All Wales	1,996	-	27	269	816	213	29	642
Expressed opinion*				14%	41%	11%	1%	33%

* To make the report easier to read, percentages are shown to nearest whole percentage point. It is therefore possible for the individual figures not to total exactly to 100 per cent.

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CABINET - 10TH DECEMBER 2014

SUBJECT: YOUNG PEOPLE NOT IN EDUCATION, EMPLOYMENT OR TRAINING

**REPORT BY: ACTING DEPUTY CHIEF EXECUTIVE AND CORPORATE DIRECTOR
EDUCATION & LIFELONG LEARNING**

1. PURPOSE OF REPORT

- 1.1 The Auditor General for Wales, as part of the programme of works for the year 2012-13 has issued (July 2014) the findings of his review of young people not in education, employment or training (NEETS). The review sought to consider the strategic approach taken by councils across Wales to reducing young people who are NEET.
- 1.2 Members have a critical role to play in evaluating Regulator reviews and in particular understanding what difference such reviews make to improvement of services for our citizens. They also have a clear role in monitoring progress in achieving report recommendations from the wide range of reviews undertaken.

2. SUMMARY

- 2.1 A total of eight councils were visited across Wales between May and July 2013.
- 2.2 The review made 6 recommendations:-
 - R1 Together with partners, map and review expenditure on NEETs services to better understand expenditure required to deliver the Framework.
 - R2 Clarify their strategic approach to reducing the proportion of 19 to 24 year olds who are NEET as well as their approach for 16 to 18 year olds.
 - R3 Focus on young people with significant or multiple barriers to engaging in education, employment or training rather than those who are more likely to re-engage without significant additional support.
 - R4 Develop their objectives and targets for reducing the proportion of young people NEET so that they can be held to account and their work aligns with the Welsh Government's targets and objectives.
 - R5 Ensure that elected members and partners fully understand that councils have clear responsibility for leading and co-ordinating youth services for 16 to 24 year olds.
 - R6 Improve the evaluation of the effectiveness and relative value for money of the services and interventions in their area that are intended to reduce the numbers of young people who are NEET.

3. LINKS TO STRATEGY

- 3.1 Caerphilly Single Integrated Plan 2013-2017
Caerphilly Youth Engagement and Progression Framework.

4. THE REPORT

- 4.1 A major internal review of service provision has taken place over the last two years. At the time of the National study the Directorate was in the early stages of implementing new processes and procedures in relation to those young people at risk of becoming and those who are classed as NEET.
- 4.2 These new processes have lead to improved links with all key stakeholders and a more focussed approach to tracking the progress and destinations of young people.
- 4.3 Our aim is early intervention and in undertaking our review we also in partnership with schools, fundamentally changed our programme for young people educated other than at school (EOTAS). This provision is currently being evaluated.
- 4.4 The current data, albeit unverified, is indicating a reduction on the 2013/14 figure of 4.4, however, it is fully recognised that there is still much work to be undertaken.
- 4.5 The Regulators proposals have been both acknowledged and incorporated into our plans to reduce the number of young people who are at risk of, or who are NEET and our next priority is to map and review expenditure on this group of vulnerable young people.

5. EQUALITIES IMPLICATIONS

- 5.1 The Local Government Measure defines fairness and access as one of the criteria that constitutes 'improvement' within the Wales programme for Improvement 2009.

6. FINANCIAL IMPLICATIONS

- 6.1 There are no financial implications associated with this report.

7. PERSONNEL IMPLICATIONS

- 7.1 There are no personnel implications associated with this report.

8. CONSULTATIONS

- 8.1 All comments have been incorporated into the body of the report.

9. RECOMMENDATIONS

- 9.1 It is recommended that Cabinet note the content of the report.

10. REASONS FOR THE RECOMMENDATIONS

- 10.1 To ensure Regulator reviews are appropriately managed and monitored across the Authority.

11. STATUTORY POWER

11.1 Local Government Measure 2009, Wales Programme for Improvement 2010.

Author: S. Aspinall, Acting Deputy Chief Executive
Consultees: T. Maher, Assistant Director Planning & Strategy
K. Cole, Head of Learning Education & Inclusion
T. Cunnick, Manager, Community, Youth & Adult Services
Cllr. R. Passmore, Cabinet Member for Education & Lifelong Learning

Appendix 1 - Young People not in Education, Employment or Training. Findings from a review of Councils in Wales - WAO, 10th July 2014.

Appendix 2 - Young People not in Education, Employment or Training - WAO, 10th July 2014.

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10 July 2014

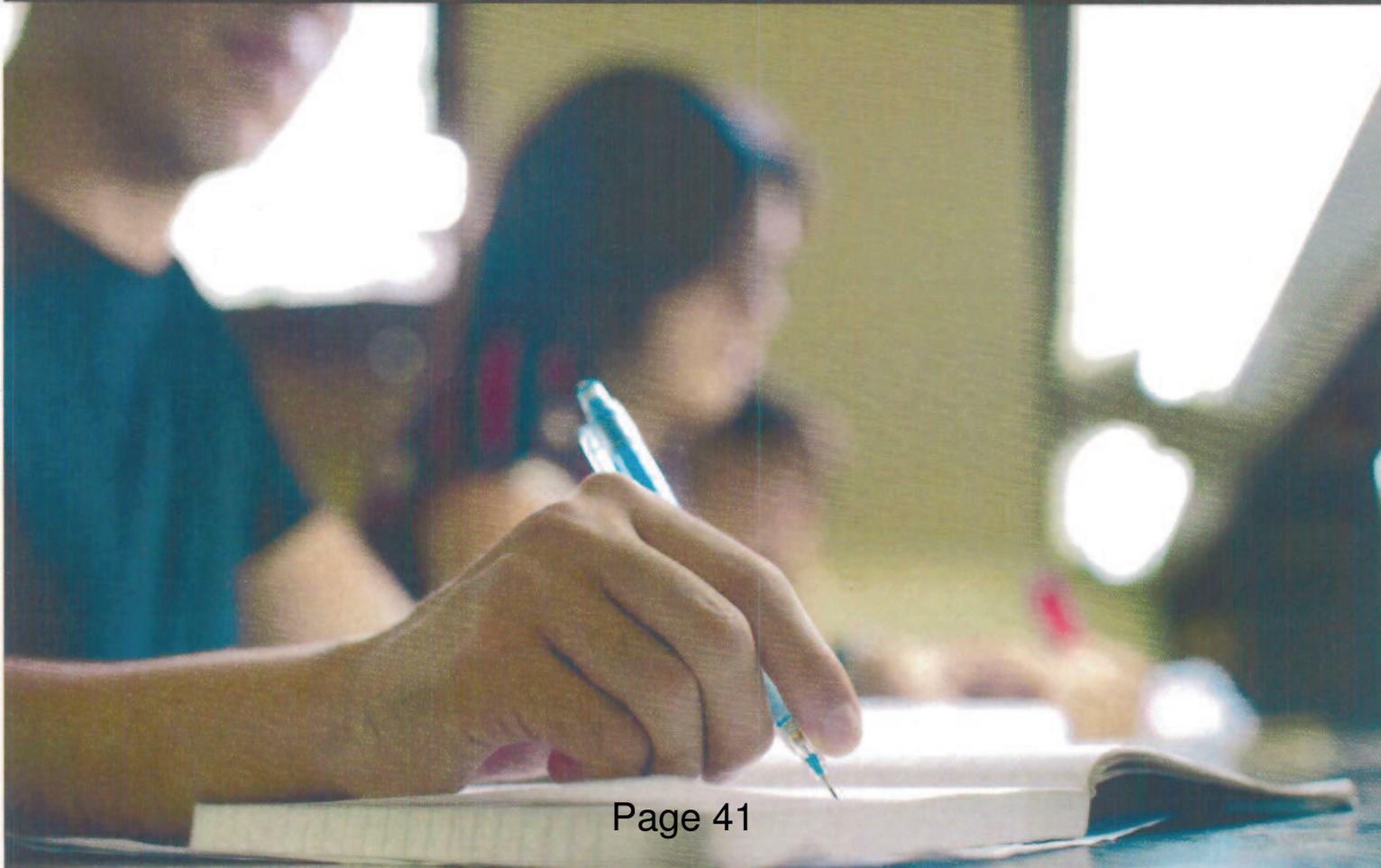
Archwilydd Cyffredinol Cymru
Auditor General for Wales

Young people not in education, employment or training

Findings from a review of councils in Wales



WALES AUDIT OFFICE
SWYDDFA ARCHWILIO CYMRU



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

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Councils are clearly committed to further reducing the proportion of young people not in employment, education and training (NEET), especially those aged 16 to 18, but planning is variable and councils have made less progress in understanding the costs and evaluating the effectiveness of interventions

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Introduction

- 1 Councils in Wales recognise the importance of reducing the number of young people who are not in education, employment or training (NEET). The Welsh Local Government Association (WLGA) noted in evidence to the National Assembly Enterprise and Learning Committee inquiry on NEETs in 2010 that the issue 'impacts not only on the life chances of individual young people, their families and their children in the future, but it is also a serious issue for the continued economic prosperity in Wales'¹.
- 2 Councils have an important role to play in reducing the number of young people NEET. The Welsh Government set out its expectations for councils' support for young people in 2000 in its guidance *Extending Entitlement: supporting young people in Wales* and subsequently in *Extending Entitlement: support for 11-15 year olds in Wales (2002)*. In these documents, the Welsh Government set out its expectation that councils should provide, secure or participate in the provision of youth support services that will encourage, enable or assist young persons (directly or indirectly) to:
 - a participate effectively in education and training;
 - b take advantage of opportunities for employment; or
 - c participate effectively and responsibly in the life of their communities.
- 3 The guidance forms the basis of the local authority's responsibilities and leadership role in reducing the numbers and risk of young people being NEET. However, there are significant variations between councils in the proportion of year 11 leavers who are NEET after three months, ranging between 4.9 and 1.3 per cent of year 11 leavers (**Figure 1**).
- 4 The proportion of young people who are NEET at 16 has fallen between 2009 and 2013, from 4.9 per cent in Cardiff and Newport to 1.3 per cent in Ceredigion. Torfaen, Merthyr Tydfil and Bridgend saw the biggest falls. The proportion in Powys increased slightly, albeit from a low base and remains below the Welsh average. The proportion of young people leaving school after year 13 (aged 18) who are known to be NEET also reduced (from 6.6 per cent in 2009 to 4.7 per cent in 2012). However, figures for year 13 leavers do not include those leaving further education colleges, independent schools or other training providers and so is not comparable with the figures for 16 year olds.

¹ WLGA evidence to the National Assembly for Wales Enquiry by the Enterprise and Learning Committee 2010, www.assemblywales.org

Figure 1 – The proportion of year 11 leavers from schools in Wales known to be NEET has fallen in Wales between 2009 and 2013 although the degree of improvement varies between councils

Council	Percentage Year 11 leavers known to be NEET		
	2009	2013	% change
Torfaen	8.2	2.5	-70%
Merthyr Tydfil	4.6	1.9	-59%
Bridgend	7.6	3.7	-51%
Newport	9.1	4.9	-46%
Cardiff	8.9	4.9	-45%
Monmouthshire	5	2.8	-44%
Gwynedd	4.2	2.4	-43%
Ceredigion	2.3	1.3	-43%
Swansea	6.4	3.9	-39%
Neath Port Talbot	7.1	4.4	-38%
Wrexham	5.0	3.2	-36%
Vale of Glamorgan	5.6	3.8	-32%
Blaenau Gwent	6.6	4.6	-30%
Isle of Anglesey	5.2	3.7	-29%
Pembrokeshire	4.8	3.4	-29%
Conwy	4.8	3.6	-25%
Carmarthenshire	4.0	3.0	-25%
Rhondda Cynon Taff	4.9	4.1	-16%
Caerphilly	5.0	4.4	-12%
Denbighshire	4.4	4.1	-7%
Flintshire	3.7	3.6	-3%
Powys	2.1	2.7	29%
Wales	5.7	3.7	-35%

Source: Careers Wales, Pupil Destinations from Schools in Wales Survey

5 In this study, we reviewed councils' work to reduce the numbers of young people not in education, employment or training (NEET) and considered if they are well placed to enable better outcomes for young people who are, or are at risk of becoming, NEET. We considered the latest data and key strategic documents² of all 22 councils in Wales as well as the outputs of a self-assessment exercise that councils undertook for the Welsh Government in Spring 2013. We visited eight councils³ between May and July 2013 and spoke to councillors, officials and partner organisations as well as reviewing a range of council documents, organisational plans and strategies. At the same time, we undertook work in Swansea and Wrexham Councils to follow up the findings of research conducted in 2011 to examine whether the good practice identified had been sustainable. We also reviewed the Welsh Government's Youth Engagement and Progression Framework and Implementation Plan (the Framework) published in October 2013 and considered its implications for local authorities.

6 We concluded that councils are clearly committed to further reducing the proportion of young people who are NEET, especially those aged 16 to 18, but planning is variable and councils have made less progress in understanding the costs or evaluating the effectiveness of interventions.

Councils are clearly committed to improving outcomes for young people and understand the social costs of not doing so, but their understanding of the financial cost of achieving their goals is weak

7 Councils have a clear commitment to reducing the numbers of young people who are NEET, especially for young people aged 16 to 18. Councils welcomed the publication of the Welsh Government's Youth Engagement and Progression Framework and the Welsh Government's general approach.

8 Generally, councils have a good understanding of the social and economic impact of young people becoming NEET, including poorer health outcomes, crime and antisocial behaviour. However, whilst most plans note the financial cost to society of a high NEET population, plans rarely refer to the cost of achieving their objectives including the opportunity costs, or calculate the costs to the councils themselves.

Despite a relatively good evidence base, the quality of councils' strategic planning is variable and accountability arrangements are sometimes unclear

9 Council planning is supported by a good and improving evidence base on the needs and whereabouts of young people who are NEET or at risk of becoming so and the range of provision available for them. However, some councils lack detail on the local profile of young people who are NEET. Some are developing processes to track the destinations of young people in year 11 although, for some, difficulties in sharing data

² We reviewed a range of strategic documents including councils' Improvement Plans, Single Integrated Plans, Strategic Equality Plans and their NEETs Strategies where available.

³ Fieldwork took place in Caerphilly, Cardiff, Vale of Glamorgan, Carmarthenshire, Conwy, Rhondda Cynon Taf, Torfaen and Flintshire Councils between May and July 2013. Fieldwork was also undertaken in Ceredigion County Council in Autumn 2013.

between organisations are a barrier to effective tracking, particularly for young people over 19. Councils are developing a variety of approaches with schools to identify pupils at risk of becoming NEET but few have evaluated the effectiveness of their approaches.

- 10 Councils have a strategic responsibility for co-ordinating and developing local services to reduce the number of young people who are NEET. But we found that some councils and their partners were unclear about the councils' responsibilities, especially for young people aged 19 to 24. Many councils have not set quantifiable targets and performance measures against which they can monitor progress. In some councils, the arrangements for holding partners to account are unclear.
- 11 The degree to which councils include their partners in planning varies. The ability of councils to hold all partners and providers to account was sometimes limited by the large numbers of providers working with young people who are, or are at risk of becoming, NEET, and by a lack of information from some providers on the outcomes of their work. The relatively rapid turnover in some providers has implications for the development of local partnerships, which may take some time to develop into effective working relationships.
- 12 Dependence on short-term grants and contracts often leads to provision that is not necessarily related to locally identified needs. Some councils expressed concerns that the level of current provision is not sustainable in the face of cuts in grants and EU funding.

Although outcomes for young people have improved, a lack of routine evaluation means that the contribution of individual interventions is often unclear, the contribution of partners is variable and the views of young people have relatively little influence on councils' work

- 13 Councils do not have a common approach to evaluating the large number of projects and programmes provided by organisations working with young people in their areas, so it is difficult to assess effectiveness and value for money. Councils have limited evidence on the effectiveness of interventions for the target group in their area. Evaluation is not undertaken routinely and some councils had difficulty obtaining information on the outcomes of programmes and interventions from partners.
- 14 Councils have worked with schools, further education colleges, work-based learning providers and other partners to identify and support young people at risk of becoming NEET. However, overall interviewees believed that partners' competition for learners was sometimes a barrier to effective joint working.
- 15 Generally, councils reported difficulty engaging with employers to develop employment and training opportunities, including apprenticeships and work experience. However, we found positive examples of councils working with local businesses and also developing their own apprenticeship programmes targeted at young people as well as training and employment support programmes for vulnerable young people.

16 Some councils have developed innovative ways to use the internet and social media to engage with and contact young people. We found examples of councils consulting young people about the services they use and taking additional steps to engage with hard-to-reach groups of young people. However, all councils recognised that they could do more to incorporate young people's views more systematically into service planning and delivery.

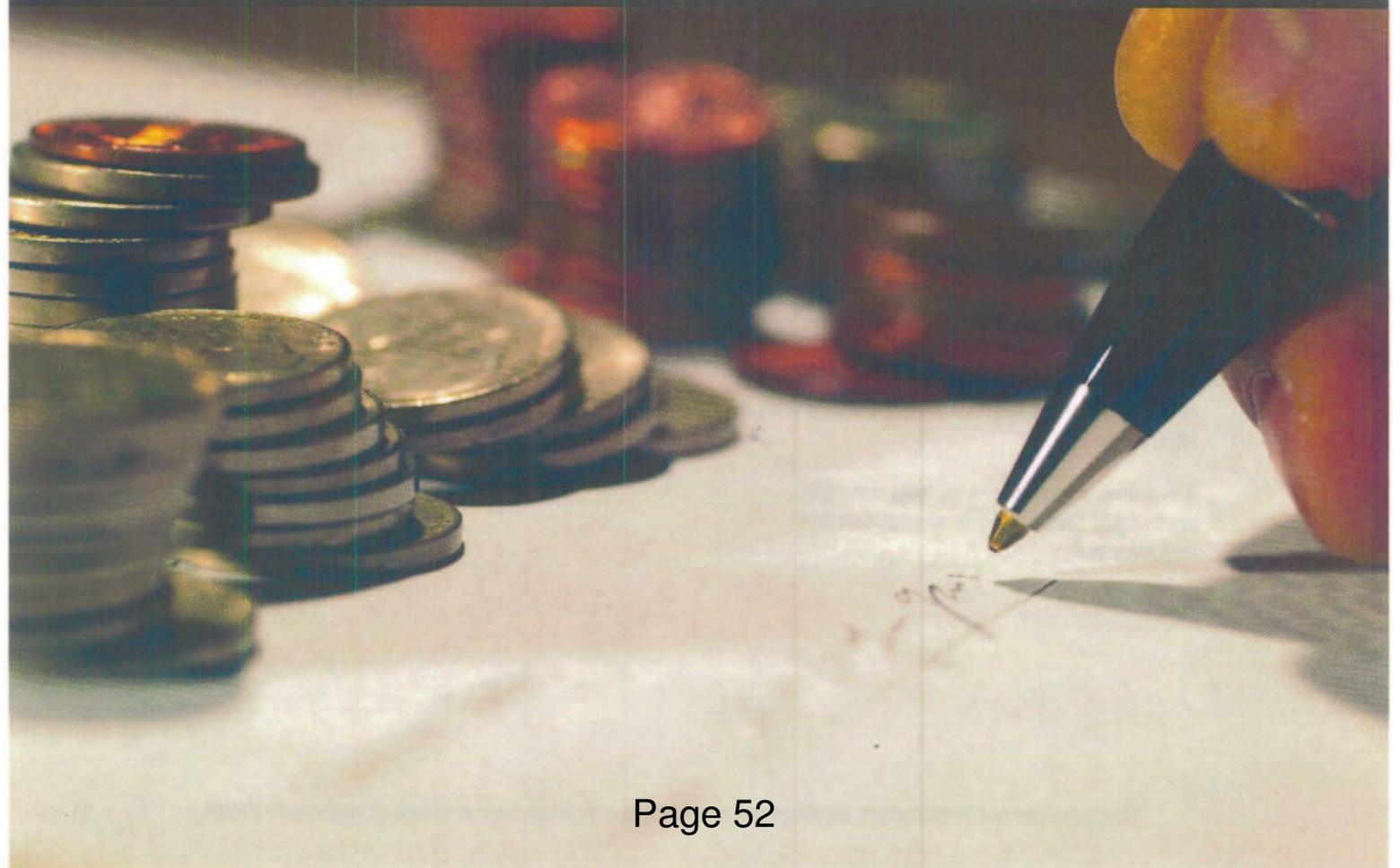
Recommendations

The Welsh Government's Youth Engagement and Progression Framework and Implementation Plan requires councils to map services, establish early identification arrangements, establish lead worker provision and to develop and discuss their plans for reducing NEETS with the Welsh Government. In addition, councils should:

- R1 Together with partners, map and review expenditure on NEETs services to better understand the resources required to deliver the Framework.
- R2 Clarify their strategic approach to reducing the proportion of 19 to 24 year olds who are NEET as well as their approach for 16 to 18 year olds.
- R3 Focus on young people with significant or multiple barriers to engaging with education, employment or training rather than those who are more likely to re-engage without significant additional support.
- R4 Develop their objectives and targets for reducing the number of young people NEET so that they can be held to account and their work aligns with the Welsh Government's targets and objectives.
- R5 Ensure that elected members and partners fully understand that councils have a clear responsibility for leading and co-ordinating youth services for 16 to 24 year olds.
- R6 Improve the evaluation of the effectiveness and relative value for money of the services and interventions in their area that are intended to reduce the proportion of young people who are NEET.
- 17 Additional suggestions to help councils implement these recommendations are included in [Appendix 2](#).

Part 1

Councils are clearly committed to improving outcomes for young people and understand the social costs of not doing so, but their understanding of the financial cost of achieving their goals is weak



Councils are clearly committed to reducing the numbers of young people who are NEET, especially at 16 and 18, and generally welcomed the Welsh Government's 2013 Youth Engagement and Progression Framework

- 1.1 In our fieldwork, we found that generally councillors and officials expressed a clear commitment to reducing the numbers of young people who are NEET, especially among 16 to 18 year olds. For example, the new administration elected in Cardiff in 2012 pledged to make Cardiff a 'NEET free city'⁴. This commitment, although pre-dating the Council's Youth Engagement, Transition and Progression Strategy, has been described as driving the policy and is reflected in a range of strategic documents, including the Single Integrated Plan, Strategic Equality Plan and the Corporate Plan. Cardiff has seen substantial falls in the proportion of 16 to 18 year olds who are NEET in recent years, which officials attributed to activities including: raising standards at Key Stage 4; a wider curriculum offer with more vocational options and progression routes; and the deployment of Learning Coaches. However, the Council's 2013 strategy recognises that any reduction will need to be more rapid to meet its vision of all young people being in education, employment or training.
- 1.2 Elsewhere, we observed that some councils' commitment to reduce the proportion of young people who are NEET had gained pace recently. In Torfaen, for example, we observed a growing awareness of the urgency attached to reducing the proportion of young people who are NEET and most interviewees reported a step-change in activity in the past 18 months. This commitment is recognised in Torfaen Council's Education to Employment Strategy 2012-16.
- 1.3 Some councils reported that the appointment of a lead official had been an important step, focusing and giving impetus to the councils' work to reduce the proportion of young people who are NEET. For example, in Rhondda Cynon Taf, officials described how the pace of activity to reduce the numbers of young people NEET increased after the Council created a 'Strategy Co-ordinator' post to support their *Supporting Engagement in Education, Employment and Training* (SEET) strategy. Cardiff Council plans to emphasise the priority of this policy area by including 'achieving the NEETs vision' in the job descriptions for a number of new directors appointed after a restructure.
- 1.4 Most councils' planning and activity to date has focused on young people aged 16 to 18. Most were also able to demonstrate some work to identify those pupils aged under 16 who were most likely to make a poor transition at 16 and are offering support and guidance in year 11 and sometimes earlier. However most of the councils we visited are beginning to look at improving outcomes for young people aged 19 to 24:

⁴ This has now been amended to 'Cardiff's ambition is to be a city where all young people are engaged in education, employment or training', reflecting in part concerns about the pejorative nature of the term 'NEET'.

- a Swansea Council is developing a NEETs Strategy for 18 to 24 year olds with key partners in Careers Wales, Job Centre Plus, further education institutions and work-based learning providers. The Strategy is based on a series of workshops delivered by Kafka Brigade UK to understand key issues affecting this cohort. Early indications are that the Strategy will develop the '5 tier model' approach to identify at risk individuals aged 18 to 24. It is also likely to include a pilot project to target high priority groups.
 - b Conwy and Denbighshire Councils have jointly begun work to map the particular needs of disengaged young people 19 to 24 in the area.
 - c Flintshire Council has worked with its Local Service Board partners to design a project to improve the education, training and employment prospects of young people aged 16 to 24. The project will: review existing programmes in the area; develop an 'Employer Promise' to encourage employers provide work experience; and increase opportunities in the public and private sector.
 - d Caerphilly Council in conjunction with Local Service Board partners has developed the PASSPORT programme aimed at addressing local skills gaps by providing employment opportunities for young people. The programme targets young people aged between 16 and 24 and who are not in education, employment or training.
 - e Wrexham County Borough Council has introduced the STAR project for vulnerable young people aged 16 to 25 including young offenders and looked after children. The project supports young people to access and maintain education, employment and training opportunities.
- 1.5 Estyn reviewed the NEETs strategies in councils that were inspected in 2012-13 and in their recent annual report for 2012-13 Estyn commented that 'in a minority of authorities, strategies to reduce the proportion of young people who are not in education employment and training post-16 are not good enough'.⁵
- 1.6 We did not undertake a detailed assessment of NEETs strategies in place across Wales. We reviewed their focus and the degree to which they referred to NEETS. We also reviewed the content of the strategies in the councils that we visited. We found that not all councils had a specific 'NEETs strategy' although all had references to young people who are NEET in at least one of their strategic plans. All councils have set targets or statements relating to improving outcomes for 16 to 18 year olds that cut across a range of strategic documents (Figure 2). Five of the councils we visited have specific improvement objectives focused on reducing the numbers of young people not in employment, education or training. The majority of councils also included objectives relating to improving outcomes for young people who are, or are at risk of becoming, NEET, in their Single Integrated Plans. The plans include a range of performance measures, although we noted that none were the same as the Welsh Government's national targets⁶. These plans and/or improvement objectives also differ substantially in their focus:

⁵ Estyn (2014), The Annual report of Her Majesty's Chief Inspector of Education and Training in Wales 2012-13, page 113 www.estyn.gov.uk/english/annual-report/annual-report-2012-2013/

⁶ Ceredigion Council does not specify an age group in its Single Integrated Plan although officials told us that the intended age range is 16 to 24.

- a Young people aged 18 or over (Swansea and Wrexham).
- b 14 to 19 year olds (Carmarthenshire and Vale of Glamorgan).
- c 16 to 18 year olds (Rhondda Cynon Taf and Torfaen).
- d 16 to 24 year olds (Caerphilly, Cardiff, Conwy and Flintshire).
- e Caerphilly, Cardiff and Flintshire have set targets for care leavers and looked after children including: attendance of looked after children at primary and secondary schools; the percentage of care leavers aged 16 to 19 not in education, employment or training; and the number of pupils in local authority care in any local authority maintained learning setting who attain the age of 16 during the school year and leave full time education, training or work-based learning without an approved qualification.

1.7 Generally, councils welcomed the Welsh Government's recent development of the Youth Engagement and Progression Framework⁷. Some of our fieldwork councils were involved in the Welsh Government's trials for the framework and had already begun to update their strategies in the light of the Welsh Government's requirements: Caerphilly Council had incorporated the lead worker role into seven new learning coach posts. Cardiff and the Vale of Glamorgan Councils redesigned their NEETs strategies in advance of the Framework's publication while Carmarthenshire and Pembrokeshire Councils developed a joint NEETs Action Plan in response to the Framework.

⁷ At the time of the fieldwork, some reported confusion about its status but this pre-dated the Ministers announcement of the Framework on 1 October 2013, which is likely to have clarified councils' roles in relation to the framework.

Figure 2 – All councils had some form of strategic objectives relating to reducing the numbers of young people who are, or are at risk of becoming, NEET, in Autumn 2013

Council	Does the authority have a 'NEETs Strategy'?	Do Improvement Objective(s) make specific reference to reducing NEETs?	Is reducing the proportion of young people NEET included in documents?		
			Elsewhere in the Improvement Plan	Single Integrated Plan	Strategic Equality Plan
Blaenau Gwent	Yes	Yes	Yes	Yes	Yes
Bridgend	Yes	Yes	Yes	Yes	No
Caerphilly	Yes	Yes	Yes	Yes	No
Cardiff	Yes	Yes	Yes	Yes	Yes
Carmarthenshire	Developing a joint strategy with Pembrokeshire	No	Yes	Yes	No
Ceredigion	Yes	No	Yes	Yes	No
Conwy	Yes	No	Yes	Yes	No
Denbighshire	No	No	Yes	Yes	No
Flintshire	Yes – within the Children and Young People's Partnership Implementation and Delivery Plans	No	Yes	Currently drafted for consultation	Yes
Gwynedd	No	Yes	Not specifically	Not yet published	Yes
Isle of Anglesey	No	No	N/A	Yes	No
Merthyr Tydfil	Yes	Yes	Yes	Yes	Not known
Monmouthshire	Yes	No	Yes	Yes	No
Neath Port Talbot	Yes	No	Yes	Yes	Yes

Council	Does the authority have a 'NEETs Strategy'?	Do Improvement Objective(s) make specific reference to reducing NEETs?	Is reducing the proportion of young people NEET included in documents?		
			Elsewhere in the Improvement Plan	Single Integrated Plan	Strategic Equality Plan
Newport	Yes	No	Yes	Yes	Yes
Pembrokeshire	Yes	No	Yes	Yes	Yes
Powys	Yes ('Keeping in touch strategy')	No	Yes	Yes	Yes
Rhondda Cynon Taf	Yes	Yes	Yes	Yes	No
Swansea	Developing strategy for 18 to 24 year olds	No	Nothing specific	Yes	No
Torfaen	Yes	Yes	Yes	Yes	Yes
Vale of Glamorgan	Yes	Yes	Yes	Yes	No
Wrexham	Yes	No	Yes	Yes	No

Source: Wales Audit Office analysis of councils' Improvement Plans and other strategic documents including the single integrated plans and strategic equality plan in Autumn 2013

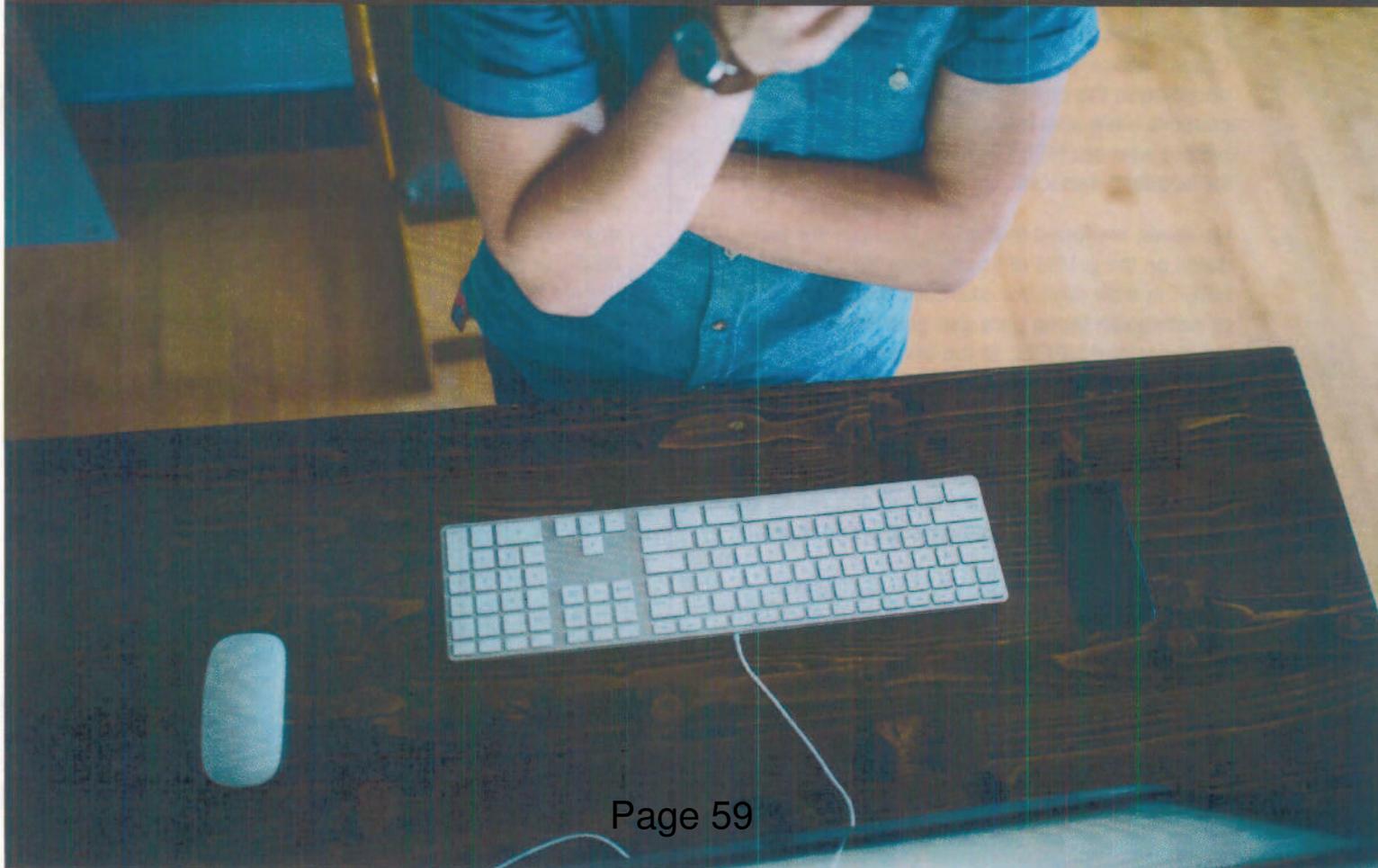
While most plans for reducing the numbers of young people NEET refer to the lifetime cost to the public purse of having a large NEET population, plans rarely make reference to the financial costs of achieving the council's objectives and none include estimates of the costs to the councils

- 1.8 In meetings with us, councillors and officials demonstrated an understanding of the general social and economic impact of young people becoming disengaged including poorer health outcomes, increased crime and antisocial behaviour over the short and long term.
- 1.9 The economic costs of young people being NEET for a sustained period were also referenced in a range of council assessments, mapping exercises and sometimes in Single Integrated Plans. The economic consequences of a high NEET population influenced the development of projects including the Caerphilly Council Passport Scheme; initiatives with local businesses to address skills gaps in Cardiff; and the development of social impact clauses in procurement contracts in Cardiff, Rhondda Cynon Taf and Swansea. However, these references tended to be to a general global cost of being NEET. Councils had not calculated the cost of young people who are NEET to them directly nor mapped and reviewed their expenditure on services for these young people. This lack of financial analysis limits their ability to balance NEETs services with other non-statutory priorities in the face of financial challenges.

- 1.10 Some councils have set out the costs of administering some initiatives, particularly 14 to 19 provision, but had not made a thorough assessment of the resources required to achieve improved outcomes for young people who are NEET or at risk of becoming so. Key documents lacked detail on the resources required to meet strategic priorities and did not consider the cost of implementing the Welsh Government's framework. Flintshire council has identified the resources required to achieve their ambitions in its strategic documents in terms of staff time, training and with some reference to funding. In Cardiff, the council has identified the cost of the brokerage element of its Youth Engagement, Transition and Progression strategy.
- 1.11 Several councils have already built identification and tracking processes around Career Wales's 'Five-tier model' for engagement and progression. This enables staff to identify support needs for each group, and the risk assessment is supported by regular meetings to share information and plan intervention on a case-by-case basis. At least two councils (Cardiff and Swansea) are developing plans to use this same model to track, identify and support young people aged 19 to 24. This is more difficult than with the 16 to 18 year olds, as there is less data available from the Department of Work and Pensions to identify and track their progress. In summer 2013, neither council had been able to estimate the resources that would be required to support this model of working for the much larger numbers of 19 to 24 year olds who are NEET.

Part 2

Despite a relatively good evidence base, the quality of councils' strategic planning is variable and accountability arrangements are sometimes unclear



Councils' planning is mostly supported by good and improving evidence although tracking young people after 16 is hampered by difficulties sharing data, and the effectiveness of various approaches for identifying young people is not known

Most councils have undertaken exercises to understand the needs and whereabouts of young people 16 to 18 who are NEET although some lacked necessary detail

- 2.1 The evidence base on the support needs of young people who are, or are at risk of becoming, NEET, is improving. For example, Conwy and Denbighshire Councils undertook a joint exercise in 2012 that highlighted the potential impact of a high NEETs population in the area on crime, health and welfare. They profiled the young people aged 16 to 18 who were NEET against the Career Wales 'five tier model' in order to better understand the demand for services. Several councils have also mapped the location of young people who are NEET to identify 'NEET hotspots' for targeting services.
- 2.2 However, we found that a few councils still lack detail on the profile of young people who were NEET in their area, for example, they were unable to distinguish those on a gap year from those who are sustained NEETs. In the Vale of Glamorgan, officials told us that the Council had a good general understanding of the number of young people who are NEET. However, they lacked a detailed breakdown of their barriers to engaging in education, employment or training and recognised that consultation with young people and more

consistent collection and analysis of data on young people who are NEET would better inform service delivery.

- 2.3 Similarly, Carmarthenshire's NEETs Action Plan recognises that more could be done to use data analysis to inform strategic planning and sets out plans for regular scrutiny by the Children and Young People's Executive Committee of data showing key trends and outcomes. Areas where councils reported some weakness in their evidence base included information about young people with a disability who are at known to be at a high risk of becoming NEET especially after 19; migrant populations; gypsy and traveller young people; and unaccompanied minors.

Councils have also undertaken exercises to map the large number and range of organisations working with young people who are NEET and those at risk of becoming so

- 2.4 Several councils have already mapped the full range of provision for young people who are NEET in their area to include not only that funded by the council but also by the Welsh Government, European Social Fund, the Big Lottery Fund and a range of charitable organisations. In some areas, this exercise revealed large numbers of organisations working with young people who are NEET or at risk of becoming so. While councils should have a full picture of post-16 school and further education opportunities, some told us that it was difficult to keep up to date with the full range of work-based learning, apprenticeships, job vacancies and opportunities through Jobs Growth Wales for 16 to 24 year olds as well as programmes provided by the third sector, some of which are relatively short-lived.

2.5 The mapping exercises provided a picture of the volume and type of provision available in the area and revealed both gaps and also some duplication of provision. Conversely, there were also gaps in provision for some groups. In Cardiff, officials were concerned about the lack of availability of spaces on courses in English for speakers of other languages (ESOL) and in Wrexham the demand for IT and practical courses outstrips supply.

Some councils have developed processes for tracking young people after age 16 although this is sometimes hampered by difficulties sharing information across organisations

2.6 Swansea Council has successfully tracked all young people in the Pupil Level Annual School Census (PLASC)⁸ year 11 cohort for the last three years and Rhondda Cynon Taf reported similar success identifying the destinations of young people in the borough. Here and elsewhere, local arrangements and trusting relationships developed over several years supported local tracking of young people who are NEET and sharing information between organisations. However, in some other councils officials said concerns about sharing data were a barrier to their effectively tracking young people after year 11. Some councils were working to develop local protocols for sharing data but told us that they would benefit from guidance from the Welsh Government on effective data sharing. Some officials reported problems getting reliable information on destinations and drop outs from work-based learning providers and further education institutions. As a result, we concluded that councils are likely to benefit from Welsh Government plans to require providers to share information on destinations and those dropping out of courses more readily with Careers Wales.

2.7 The Department for Work and Pensions holds information on 19 to 24 year olds who are unemployed. However, it is unable to share personal details that would facilitate tracking with councils because of data protection legislation that restricts the sharing of personal data from claimants. In Ceredigion, for example, although the protocol for data sharing is well developed, the Department for Work and Pensions does not take part in local data sharing and tracking. This limits the Council's ability to build a profile of 19 to 24 year olds locally who are NEET to support planning and evaluate the effectiveness of intervention work. Swansea Council is developing data sharing agreements with the Department for Work and Pensions locally to enable tracking progress whereby young people would be asked to consent to the Job Centre Plus sharing their details with the Council when they make their initial benefit claim.

Councils are developing approaches to identifying pupils at risk of becoming NEET although the effectiveness of the varying approaches has not yet been evaluated

2.8 Councils and schools have developed a variety of approaches to identifying pupils at risk of becoming NEET. These prediction tools are based on a combination of factors, including attainment, attendance, behaviour and other indicators. Wrexham and Carmarthenshire have plans to begin identification as early as year six (age 11), whereas other approaches focus on pupils in years 10 and 11 (ages 15 to 16).

⁸ The Pupil Level Annual School Census (PLASC) includes pupil details for state funded nursery, primary, secondary and special schools. The census does not include children educated other than at school or independent schools.

2.9 However, few councils have evaluated the effectiveness of their developing processes for identifying pupils at risk of becoming NEET or the variety of assessment tools being used. Swansea Council produces an annual report on year 11 destinations which includes analysis of the cohort data by age, ward, ethnicity and the red, amber or green status they were given during their vulnerability assessment. This has been used to identify trends and review the effectiveness of the vulnerability assessment tool. Their 2012 report found that 16 per cent of the cohort were identified as 'red'. A further 17 per cent were identified as 'amber' and offered light touch support and monitoring. Follow-up work found that, of the just over 900 learners identified as 'red' or amber in year 11, only seven per cent of those identified as red or amber in year 11 were subsequently known to be NEET. Only 10 of those known to be NEET after year 11 had not been identified as being at risk in year 11.

2.10 The Welsh Government published research looking at the factors that best predict becoming NEET in September 2013 and effective practice guidance for councils on developing identification mechanisms in January 2014⁹. The Welsh Government recognises that early identification approaches will not be standardised over Wales as some councils have already developed their own methods and approaches. It required all councils to implement processes to identify young people at risk of becoming NEET in Key Stage 4 by September 2013. It expects that councils will be able to identify young people at risk in Key Stage 3 by September 2016.

Councils have strategic responsibility for co-ordinating and developing local services to reduce the number of young people who are NEET but some do not fully understand their responsibilities and accountability mechanisms are sometimes unclear

2.11 Most councils had reasonably clear arrangements for holding officials to account for progress reducing the number of young people who are NEET although there were sometimes concerns about the level and frequency of reporting to scrutiny committees or cabinet. In Rhondda Cynon Taf, for example, the Council's progress against the NEET improvement objective was monitored under their existing performance management arrangements but there was no specific monitoring or reporting on its NEETs targets and the developing action plan to support the delivery of the Supporting Education, Employment or Training strategy did not ascribe responsibility for actions.

2.12 In some councils however, the level of challenge and accountability was weak. For example, in Caerphilly, a 2012 Estyn report concluded that generally the scrutiny process was not used to hold partners to account for work to improve outcomes for children and young people and, at the time of the fieldwork, no report specifically on NEETs related activity or progress had been considered by scrutiny committees or Cabinet.

⁹ Welsh Government (2014). Early identification: Effective practice guidance, www.wales.gov.uk

- 2.13 Some councils have not set any targets and performance measures for work with young people who are NEET, which reduces their ability to hold officials and partners to account. In Cardiff, for example, although officials and partners were committed to achieving the Council's aim to be 'NEET free', we observed that accountability and performance management were stronger in some departments than others. The Council has set no overall target for reducing the numbers of young people who are NEET to measure progress towards its stated desire to be 'NEET free'. Within the Council, Families First and Communities First have developed scorecards to measure progress and there is a range of performance measures used to monitor the progress of learning coaches, training and enterprise centres and the Careers Wales team. Similarly, in Rhondda Cynon Taf, the 'Supporting Engagement in Education, Employment and Training Strategy 2012-15', Single Integrated Plan and Corporate Plan lack clear targets and focus on actions to reduce the number of young people NEET.
- 2.14 Some councils recognised that more could be done internally and with partners to raise awareness of their statutory responsibilities towards 16 to 24 year olds generally and, in particular, for care leavers. Cardiff Council plans to address this through a 'care-leaver and looked after children pledge' that makes the legal responsibilities more explicit. This pledge will be developed with partners as well as children and young people and aims to raise awareness of statutory obligations in the hope that they become a more routine part of service planning.
- 2.15 There were other positive examples of individual council departments meeting their statutory requirements:
- a Rhondda Cynon Taf County Borough Council's Looked After Children's Outcome Board which monitors and scrutinises looked after children data from relevant agencies. The Council also won an award from the Centre for Public Scrutiny for the work its child poverty scrutiny task and finish group did to raise awareness amongst councillors of the impact of child poverty.
 - b An Estyn Inspection in 2012 judged that Caerphilly County Borough Council met its statutory duties well in relation to children and young people with additional learning needs, and had a clear safeguarding policy and procedures.
 - c The Vale of Glamorgan Council sets out its legal position in its NEETs Strategy including an equalities assessment.
- 2.16 However, it is not clear that there is an overall understanding among councillors and officials of responsibilities for co-ordinating youth services, especially for young people aged 19 to 24. Some councillors at Cardiff Council said that they had not received training setting out these statutory responsibilities. Several councils were unable to demonstrate whether they are regularly monitoring compliance with their legal responsibilities. In some areas, officials and council partners recognised the council's legal responsibilities for co-ordinating and leading youth services. Elsewhere, while officials and councillors recognised the responsibilities of the council for young people up to the age of 24, they raised operational concerns about the limitations

of their involvement with the age group, compared to 16 to 18 year olds where they had many levers through the 14 to 19 partnership and other service areas. With the older age group, the Department for Work and Pensions plays a major role through the requirements placed on young people by the benefits system and the provision of training.

The degree to which councils include partners in planning varies and the relatively rapid turnover in providers has implications for the effectiveness of local partnerships

2.17 In some councils, strategic planning to date has focused on the local authority rather than recognising the contribution of its local partners. In Caerphilly, the Council recognised it needed to address the lack of co-ordination between the Council and its partners. To achieve a more co-ordinated approach to reducing the numbers of young people NEET, the Council established a Core Planning Group as a mechanism for engaging with its partners. A head teacher chairs the group attended by representatives of youth services, Careers Wales, colleges and other partners. Conwy and Denbighshire Councils worked with Careers Wales, Coleg Llandrillo and Job Centre Plus to obtain European funding for a strategic officer hosted by Careers Wales at Coleg Llandrillo to identify and coordinate resources and services for young people aged 19 to 25 across the counties. In some areas, strategic planning extended to local partnerships and clearly set out responsibilities. For example, in Conwy relevant partners are represented on the strategy group that oversees NEETs work. Partners told us that the group supported an

effective partnership with lead agencies for each action (eg, Careers Wales leads on information sharing). Currently, the Department of Work and Pensions is not represented in the group because of its focus on 16 to 18 year olds but the council recognises that membership would need to change if the focus widened to include those who are 19 plus. Partners in Ceredigion described the multi-agency NEET practitioners group as an effective mechanism for identifying and assessing young people at risk of becoming NEET. The agendas for the group's monthly meetings clearly distinguish between under 16s and 16 to 18 year olds.

2.18 Councils told us that the difficulty of obtaining information on outcomes of work from some partners not funded by the Council is a barrier to their being able to hold partners to account. For example, Wrexham Council experienced problems getting progression data on young people from a new work-based learning provider unused to local information sharing agreements. Others told us that it was difficult to obtain more detailed information from work-based learning providers to inform their local planning and development.

2.19 In some areas, officials told us that the high level of turnover in training providers as a result of their dependence on short-term grants and contracts made local partnership working more difficult. Not only do councils have to keep reviewing the range of organisations working in their areas but they also need to reinvent working relationships. Local partnership arrangements take time to become established. For example, respondents in Wrexham told us that they had to put time and resources into developing new relationships when the contract for work-based learning

provision was awarded to a provider with a limited knowledge of local partnerships. Carmarthenshire reported that the nature of work-based learning contracts means that the local partnerships are not always aware of the full extent of work-based learning provision if this is offered by providers based outside the local area.

- 2.20 Respondents in several areas commented on the difference between the levels of support offered by project workers to young people who are NEET or at risk of becoming so. Many of these young people experience many barriers to their participation in the labour market and receive a high level of support, sometimes from multiple agencies. However, respondents recognised that young people often found that the levels of support dropped sharply once the young person reached 18. As a result, some young people who remained NEET over a long period experience a very abrupt transition when they became 18.
- 2.21 Many respondents were concerned that young people will need to be better prepared for the requirements that they will face as young adults if they remain NEET, including engaging with the Department of Work and Pensions through Job Centre Plus. Swansea Council is developing an 'ethical standards approach' to examine this issue and develop a more consistent approach across all of the organisations working with young people. Multi-agency workshops have taken place to agree the knowledge, skills and attitudes that young people need in order to successfully navigate their future as well as the approach that frontline support staff should take to encourage these qualities. The Council is now discussing ways to embed these principles in service delivery for young people.

Dependence on grant funding leads to provision not necessarily related to needs and may not be sustainable in the face of cuts in grants and EU funding

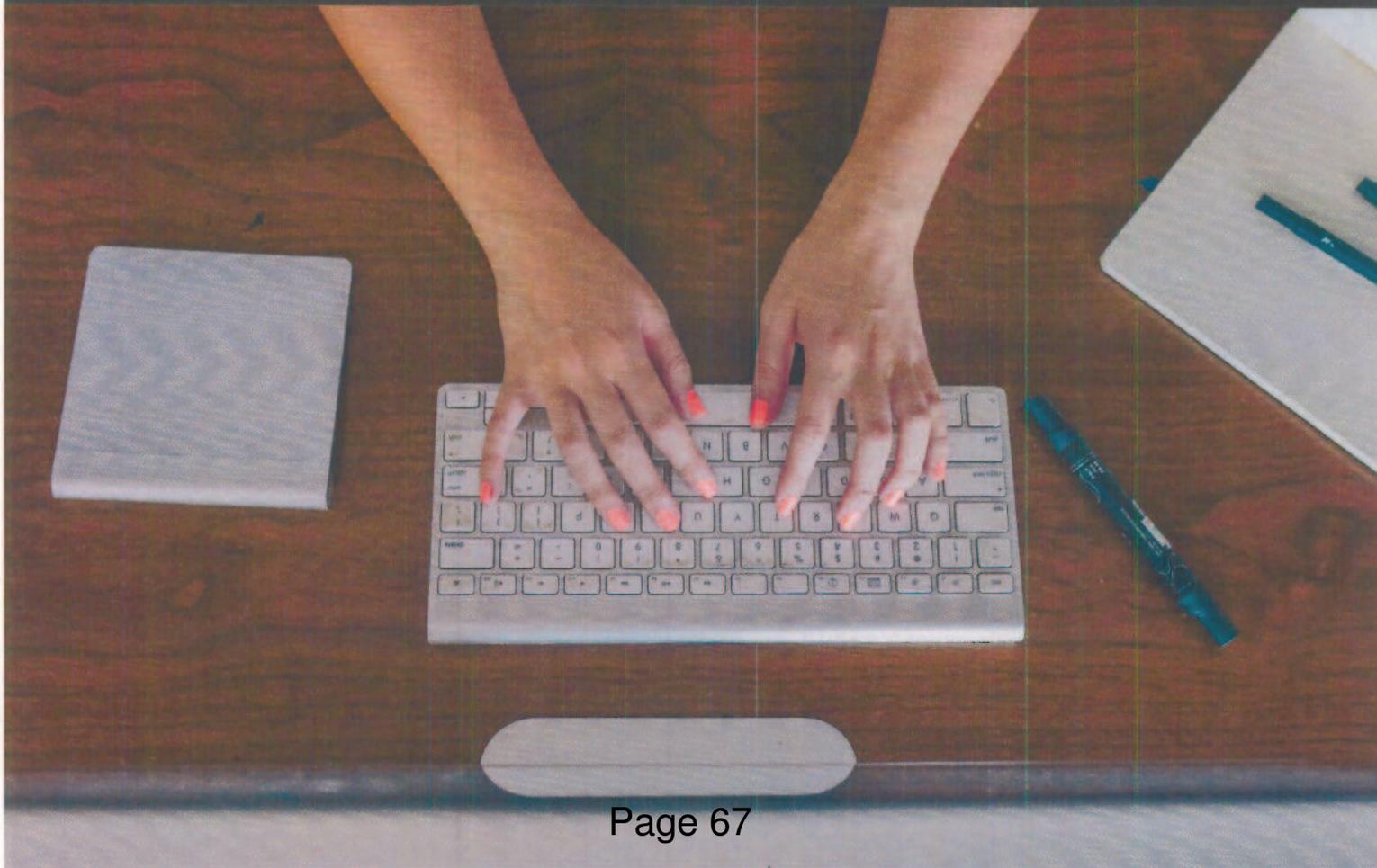
- 2.22 We observed that the type of provision available in areas tended to reflect both the availability of grants for certain types of work with young people and also the relative success of some providers in applying for grants. As a result, some areas had a very high level of provision and some duplication of services.
- 2.23 There were some examples of councils working with partners to develop exit strategies to ensure that services valued by the council and young people continued when grant funding ceased. In particular, two programmes funded by the European Social Fund – 'Engage' and 'Potensial' – were mentioned in several areas as projects particularly valued by councils and young people¹⁰. In Swansea schools had provided funding to continue some of the work undertaken by these projects. In Conwy, schools and the Council have provide funding to continue the work of the Potensial project. This will include setting up on-site Inclusion Centres at each Secondary School. Following an evaluation of the Engage Project in Ceredigion, the Council made changes to local services to continue successful initiatives and fill gaps in provision.

¹⁰ 'Engage' provided intensive support to young people aged 14 to 19 who were NEET or at risk of dropping out. The 'Potensial' programme was aimed at pupils aged 14 to 16 with problems of attendance and behaviour as well as 16 to 19 year olds in further education at risk of dropping out.

2.24 Some councils expressed concerns about the sustainability of provision in the face of cuts in public spending and the reduced value of European funds. For example, officials in Carmarthenshire reported that the percentage of year 11 leavers becoming NEET increased in 2012-13 partly because of the end of European funding for the 'Engage' project. Wrexham Council told us that funding reductions meant that its well-regarded STEPS programme could no longer provide full time courses. Respondents in Wrexham were concerned about future sustainability; one commented that 'we know where the young people are and who they are but we might not have any projects to support them'. In Flintshire, officials expressed concern that supporting young people up to the age of 25 will be challenging given diminishing resources available within the Council for non-statutory services.

Part 3

Although outcomes for young people have improved, a lack of routine evaluation means that the contribution of individual interventions is often unclear, the contribution of partners is variable and the views of young people have relatively little influence on councils' work



Councils do not have a common approach to evaluating the large number of projects and programmes provided by organisations working with young people in their areas, so it is difficult to assess their effectiveness and value for money

3.1 Councils generally had limited evidence on the effectiveness of the full range of work undertaken with young people in their areas who are NEET or at risk of becoming so. In Carmarthenshire, the Council conducted a review of provision through a series of sessions with organisations operating in the area. Sessions focused on progress towards NEETs reduction targets, potential for innovative projects and further partnership working. Feedback from the review has informed the development of the NEETs action plan such as the early identification approach. Some councils have evaluated specific projects, for example:

- a Cardiff Council has evaluated the effectiveness of some interventions such as pre and post-16 learning coach provision and is developing a team of young inspectors to monitor the progress of Families First projects;
- b Conwy Youth Council has evaluated the effectiveness of work experience placements and will participate in the Conwy Council's review of its NEETs strategy in 2013-14;

- c Rhondda Cynon Taf Council has reviewed Families First services against outcomes to address the imbalance between family support initiatives and education, employment and training initiatives; and
- d Ceredigion County Council commissioned an independent evaluation of the Engage project to identify priorities for future funding.

3.2 However evaluation is not generally undertaken routinely. Combined with the difficulty that some councils experience in obtaining outcome measures from partners, this results in most councils lacking a clear picture of 'what works' in their area to inform service planning and delivery. This also means that councils are not well placed to judge the value for money of interventions. Some councils told us that they are planning steps to address this gap:

- a the Vale of Glamorgan aims to embed evaluation into service development;
- b Cardiff aims to develop a monitoring and evaluation framework and use pilots including the vulnerability assessment to learn lessons and develop future provision; and
- c Flintshire reviewed existing provision as part of its 'Time for Change' programme for reducing the number of young people aged 16 and over who are NEET.

Councils have worked with schools, further education colleges and other partners to improve outcomes for young people who are NEET but competition between partners for learners can hinder effective local work

- 3.3 The councils that we visited are working with their schools to identify and offer support to young people at risk of becoming NEET. Officials reported that schools are increasingly involved in this work and are increasingly reporting and monitoring post-16 outcomes. Ongoing work includes implementing a range of vulnerability assessments, work to improve attendance and behaviour, developing an alternative curriculum, and identifying potential risk factors for becoming disengaged.
- 3.4 Councils are also working closely with their sixth forms and further education institutions to reduce disengagement and dropping out. For example, in several councils learning coaches work with schools to support young people at risk of disengaging with education. Cardiff Council has recently begun work with Careers Wales to provide support for young people at risk of disengaging from school sixth forms. Cardiff Council is also putting on workshops to bring foster carers, teachers and social workers together to raise awareness of the educational issues of looked after children.
- 3.5 Many councils have put arrangements in place to support young people during the transition period at year 11. In Rhondda Cynon Taf, post-16 transitional workers have recently been appointed to work with schools and Careers Wales and young people at risk of becoming NEET. Schools in Wrexham told us that close working relationships with social workers, careers advisors and the youth service are crucial in reducing the number of young people NEET. One of its schools told us that employing a behaviour mentor funded by the Pupil Deprivation Grant had been a valuable intervention that enabled learners to remain engaged in school.
- 3.6 Councils also work closely with further education colleges and, in some cases, work-based learning providers to prevent drop-outs and improve retention rates:
- a In Carmarthenshire, Coleg Sir Gâr provides support for young people at risk of dropping out of college courses through a dedicated learning services team and work with year 10 and 11 pupils through its Youth Access programme.
 - b Yale College in Wrexham provides 'Winter College' as a taste of college life for young people at risk of becoming NEET in Key Stage 4.
 - c In Cardiff, work-based learning providers also provide taster sessions for young people.
 - d Several councils – including Rhondda Cynon Taf, Caerphilly and Cardiff – have regular meetings with further education institutions to discuss attendance and drop-outs. In Cardiff, at least one work-based learning provider (ACT Training) has asked to be part of this process.

3.7 Research has pointed to the importance of flexible learning opportunities for those at risk of disengaging¹¹. Several further education institutions and work-based learning providers have worked with councils to provide flexible learning opportunities to improve retention and encourage young people to take part in further education:

- a Cardiff Council has worked with further education institutions to provide A-Level courses at a local school for young people who are put off attending the further education college because of the travelling involved. The Council has also worked with Cardiff and Vale College to provide courses that provide practical learning in fashion and auto-mechanics that reflect local employment opportunities. The College has developed courses in English for speakers with other languages to fill a gap in provision. A course specifically for the growing number of unaccompanied minors arriving in the City has continuous enrolment so young people do not have to wait to start learning. Cardiff Council is continuing to work with the College to develop post-16 pathways for these young people, including support to participate in entry-level vocational courses.
- b In Wrexham, work-based learning provider ITEC works closely with the Council to provide and support placement opportunities. They also support care leavers and plan to work with pupil referral units in the near future to identify those at risk of dropping out early and keep them engaged.

3.8 Despite this activity, competition between schools, work-based learning providers and further education institutions for learners can cause tension and hinder partnership working. Wrexham Council reached an agreement with its schools that sixth forms no longer provide level one and two courses. This reduces duplication and enhances provision because the further education college is seen as a more relevant environment for these learners.

3.9 Several work-based learning providers told us that they believed schools did not promote their provision as a viable option to their learners and one work-based learning provider told us that they had been actively prevented from marketing their courses in local schools. In Swansea, the UCAS online application system presents young people in year 11 with the full range of options available in their area. This ensures that all school pupils can find out about the full range of options available to them locally. The Welsh Government is piloting a common application process for post-16 learning closely modelled on the Swansea approach from September 2013.

11 Nelson, J and O'Donnell, L. (2012). *Approaches to Supporting Young People Not in Education, Employment or Training: a Review* (NFER Research Programme: From Education to Employment) Slough, NFER.

Generally, councils reported difficulty engaging with employers to develop opportunities such as apprenticeships and work experience and to educate young people about the opportunities available in the labour market

3.10 Several councils admitted to difficulties engaging with employers to encourage labour market opportunities and also to influence education and training. Some employers also told us that they had found some schools were reluctant to engage with them. In Rhondda Cynon Taf for example, officials told us that employers have had limited involvement in the development of the Rhondda Cynon Taf SEET (Supporting Education, Employment or Training) Strategy. The SEETs group that oversees the Council's work in this area does not include any representatives of local businesses are not represented. Torfaen Council officials told us that they wanted to do more work with employers to publicise the support available to employers taking on young people and also with young people to promote work opportunities available across the authority. Research suggests a lack of engagement with employers is a common problem in the UK: a review by Ofsted also found employers had insufficient involvement in the development of councils' strategies to reduce the number of young people not in education, employment or training¹².

3.11 Some councils, however, reported success in their work with employers to identifying opportunities for their young people:

- a Cardiff Council has a team working with local businesses to gather regular intelligence on business needs and skills gaps. This work informs initiatives with local universities to design courses to address these gaps. The Council also develop links with local businesses through employer engagement events, job fayres and a working group to understand relevant issues affecting businesses across the city. The group identified the need for pre-employment training and SWALEC has developed the 'Learn to Earn' project to provide this support in the new Eastern High School.
- b Rhondda Cynon Taf Council is also running a pilot project to bring local businesses to schools to raise awareness of opportunities available and provide job search skills and Conwy Council has worked with employers to improve work placement opportunities.
- c The Vale of Glamorgan Council has identified new opportunities for its young people as a result of new employers locating in the area in the foreseeable future.

¹² Ofsted (2010) *Reducing the numbers of young people not in education, employment or training: what works and why*, page 6

3.12 Councils are major employers in their own right and a number have developed apprenticeship schemes, some of which target young people who are NEET. Not all are aimed at young people specifically nor at those most likely to be disengaged. Rhondda Cynon Taf for example established an apprenticeship programme offering 30 places combining practical training and studies across the Council in 2012. Although the apprenticeship programme does not feature within the Council's SEETs strategy, young people may apply. The Council plans to evaluate the scheme in 2013-14. RCT Homes also run a successful apprenticeship programme although this also does not feature strongly in the SEETs strategy and is open to people of all ages. In Wrexham, however, the Council's apprenticeship scheme is aimed at 16 to 17 year olds and, after a review, the Council also removed its initial entry requirement of five GCSEs at grades A*-C to provide opportunities for a wider group of young people, including those most likely to be NEET. Similarly, the Caerphilly Passport Scheme aims to reduce levels of unemployment amongst young people aged 16 to 24.

3.13 Some councils have developed training and employment programmes for young people with specific needs. Flintshire County Council provides work placements for vulnerable young people. Rhonda Cynon Taf Council has developed a work-based traineeship programme at Vision Products in partnership with Ysgol Hen Felin and Elite Support Employment Agency to encourage young adults with disabilities into work.

3.14 Respondents in several areas commented that, in their experience, young people's aspirations do not always match local opportunities. They told us that many young people were not interested in retail as a career route although this sector made up a large proportion of the opportunities available and included routes into retail management. Conversely, in some areas demand for ICT, hair and beauty courses outstripped the supply of job opportunities locally in these fields. Again, this mirrors the finding of other research that the curriculum could improve to increase young people's understanding of the world of work and the opportunities available to them (Ofsted, 2010:6, NFER 2012).

Some councils have developed innovative ways to use the internet and social media to engage with young people but all recognise that they could do more to use young people's views and experiences to influence the design of local services

3.15 We found several examples of councils using the internet and social media innovatively to inform and engage with young people. Several councils have websites, often linked to Twitter or Facebook accounts, that aim to inform young people about services and encourage participation. Young people are involved in editing the websites at several councils:

- a the Vale of Glamorgan's Swoosh website gives advice on education, employment and training and information on the Council's mobile service provided in partnership with Job Centre Plus and Careers Wales to provide information, advice and guidance in this area;

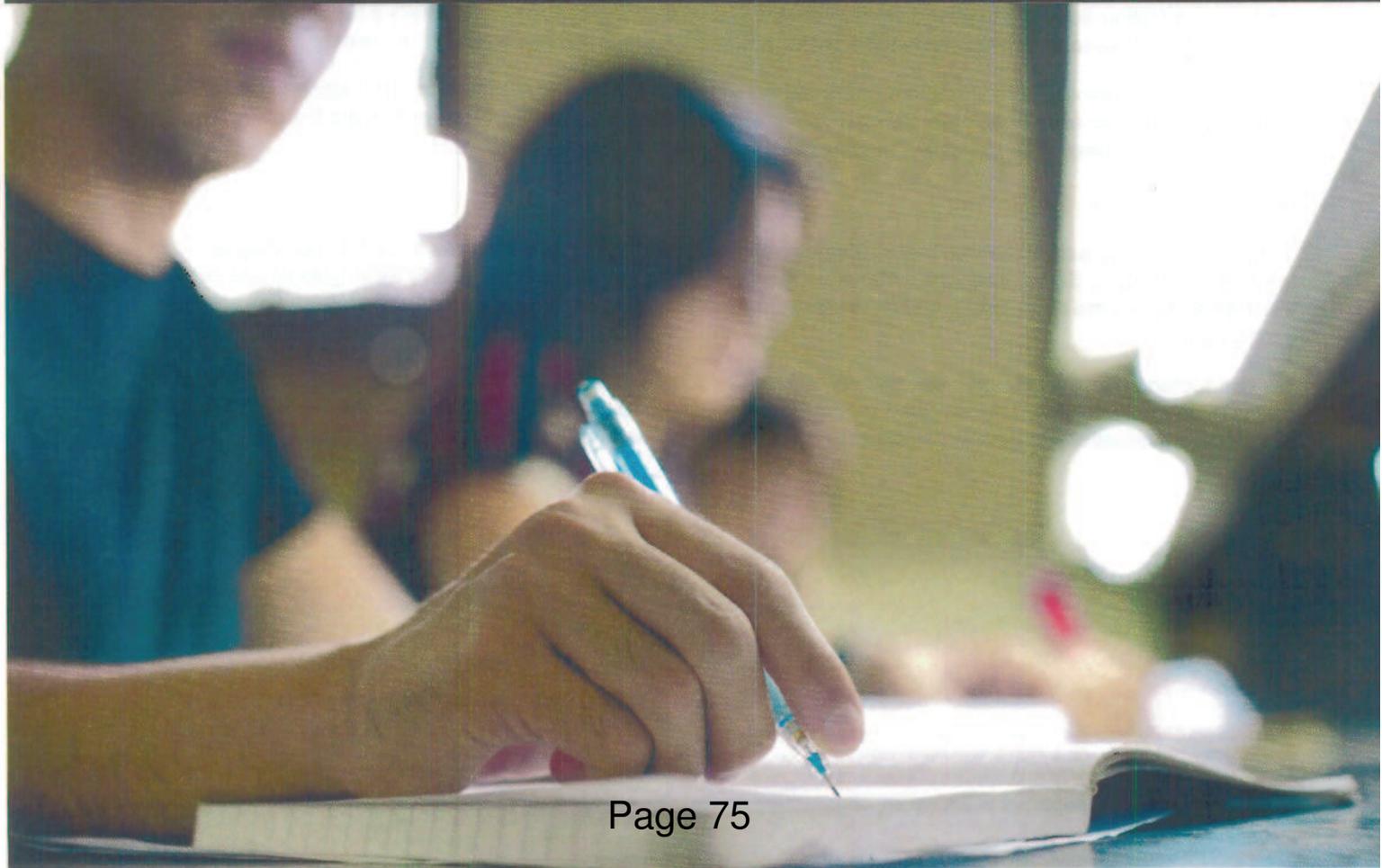
- b) Caerphilly County Borough Council uses social media to advertise its Passport Scheme;
 - c) in Flintshire, the Council worked with a local artist, film company and young people to develop an accessible DVD version of the Children and Young People's Plan (2011-14); and
 - d) Cardiff Council ran a 'Hackathon' in August 2013, aimed at bringing together young people, youth workers, businesses and employers with programmers and developers to co-design digital products and services that enable young people to make better decisions about their future.
- 3.16 Fewer examples, however, emerged of councils developing the internet or social media for education and learning, although Cardiff Council currently uses an online skills tracking programme in schools from key stage 2 onwards. The software is designed to look similar to Facebook and gives young people the opportunity to upload details of activities and answer a series of questions about the types of skills they have used.
- 3.17 Officials in some councils were cautious about the use of social media and there appear to be different approaches to the use of social media by front line staff. For example, officials in Rhondda Cynon Taf expressed concerns about safeguarding and data protection issues and would like more guidance on the appropriate use of social media. In Cardiff, frontline staff said that they felt that internal bureaucracy limits their use of social media as they have to use the Council's communications department to send a message.
- 3.18 There were many examples of councils consulting young people about the services they use and their experience of education, employment and training. Councils used youth forums, school councils, working groups or one-to-one engagement by frontline staff (youth workers and learning coaches) to understand and respond to the needs of individuals. For example:
- a) Cardiff's Youth Council took a list of its priorities to the Cardiff Partnership, which raised concerns about the high cost of public transport for 16 and 17 year olds which was believed to be a barrier to attending education, employment or training, with the result that Cardiff Bus changed the fare structure for young people;
 - b) Conwy's Youth Council recently investigated the quality of work experience placements, which resulted in developing a prospectus that aims to improve both the quality of and access to work experience;
 - c) young people were involved in the commissioning process for Families First with Barnardos as part of Cardiff's Young Commissioners Programme which subsequently won a national procurement award; and
 - d) Ceredigion County Council consulted young people on the alternative curriculum and as part of the evaluation of the Engage project.

- 3.19 Councils recognise that young people who are NEET or at risk of becoming NEET are amongst those hardest to reach and some have taken additional steps to engage with them:
- a Cardiff Council employed a youth worker with the skills and knowledge to engage with young people in black and minority ethnic communities;
 - b in the Vale of Glamorgan, a 'Difficult to Engage' group considers the needs of hard to reach young people; and
 - c Conwy's Youth Council undertook an investigation of the experience of care-leavers that resulted in a video presentation in which care-leavers discussed their experience, including their transition to education, employment or training.
- 3.20 However, we found that most councils do not systematically incorporate young people's views and experiences into service planning and delivery.

Appendices

Appendix 1 - Methodology

Appendix 2 - Detailed recommendations



Appendix 1

Methodology

Visits to councils

We visited eight councils across Wales between May and July 2013¹³:

- Caerphilly
- Cardiff
- Carmarthenshire
- Conwy
- Flintshire
- Rhonda Cynon Taf
- Torfaen
- Vale of Glamorgan

We spoke to councillors and senior officials responsible for setting the councils' strategic approach to reducing young people who are NEET during these visits. We also spoke to other staff responsible for working with young people directly, both those employed by the councils and other service providers.

We also spoke to partners in the local areas including Careers Wales, the Department for Work and Pensions, schools and further education college staff, and work-based learning providers, to obtain a full picture of services in the area. We spoke to staff from some third-sector projects where these operated in the areas.

We also visited Swansea and Wrexham councils that were the subjects of research in 2011 which identified factors associated with successful implementation of initiatives for young people NEET. We examined the extent to which the councils have been able to sustain services and develop them further since 2011.

Review of strategic documents

To inform the study we considered key strategic documents of all 22 local authorities in Wales including councils' Improvement Plans, Single Integrated Plans, Strategic Equality Plans and their NEETs Strategies where available. We also analysed the outputs of a self-assessment exercise that councils undertook for the Welsh Government in spring 2013.

We conducted a more thorough investigation of council documents as part of the evidence collected for the eight councils we chose to visit. This included a range of information from organisational plans, strategies, consultation reports and evaluations to gain an insight into local service provision for each area.

¹³ Ceredigion Council requested that we review their work with young people who are NEET as part of our programme of assessment work. This took place in October and November 2013 and we refer to some findings in this report.

Appendix 2

Detailed recommendations

The Welsh Government's Youth Engagement and Progression Framework and Implementation Plan requires councils to map services, establish early identification arrangements, establish lead worker provision and to develop and discuss their plans for reducing NEETs with the Welsh Government. In addition, councils should:

- R1 Together with partners, map and review expenditure on NEETs services to better understand expenditure required to deliver the Framework.
- R2 Clarify their strategic approach to reducing the proportion of 19 to 24 year olds who are NEET as well as their approach for 16 to 18 year olds.
- R3 Focus on young people with significant or multiple barriers to engaging in education, employment or training rather than those who are more likely to re-engage without significant additional support.
- R4 Develop their objectives and targets for reducing the proportion of young people NEET so that they can be held to account and their work aligns with the Welsh Government's targets and objectives.
- R5 Ensure that elected members and partners fully understand that councils have clear responsibility for leading and co-ordinating youth services for 16 to 24 year olds.
- R6 Improve the evaluation of the effectiveness and relative value for money of the services and interventions in their area that are intended to reduce the numbers of young people who are NEET.

To assist councils to implement these recommendations specific suggestions are included below.

To develop a more thorough understanding of expenditure on youth services generally and NEETs services in particular

- R1 Generally, councils have not assessed the full extent of their own or their partners' expenditure on youth services and employment support. This knowledge gap means that they have no basis for assessing the resources required to implement the Framework or monitor the cost effectiveness of their current expenditure. To provide a firmer basis for future policy making:
 - councils and their partners should map and review their expenditure across youth services to be better placed to judge the cost effectiveness of this expenditure; and
 - councils should more systematically assess the resources required to implement the Welsh Government's Framework to provide an informed basis to their biannual discussions with Welsh Government officials on the implementation of its Framework.

To achieve national targets to reduce the proportion of 19 to 24 year olds who are NEET.

R2 The Welsh Government has set a target in its *Tackling Poverty Action Plan 2012-2016* to reduce the proportion of young people 19 to 24 years old who are NEET. Councils' work to date has concentrated on 16 to 18 year olds although some are beginning to develop services for 19 to 24 year olds. This is made more complicated by the fact that the majority of 19 to 24 year olds are usually no longer in contact with schools and further education colleges and by the fact that their main contact is often with the Department for Work and Pensions (DWP), responsible for welfare and employment support for the long-term unemployed. The Framework focuses on 16 to 18 year olds and the Welsh Government believes that improving progression at this age will lead to improved outcomes later. However, work elsewhere has found that councils need to continue support for disengaged young people after the age of 18. We found that many councils are beginning to consider how the approach with 16 to 18 can be adapted for the greater number of 19 to 24 year olds who are NEET. This includes developing links with the DWP locally which plays a more important role with the age group. To achieve its targets to reduce the proportion of 19 to 24 year olds NEET:

- councils need to clarify their strategic approaches to reducing disengagement among 19 to 24 year olds;
- councils should consider whether the approach taken to identifying and support 16 to 18 year olds who are NEET is appropriate for the older age group given the much greater numbers of 19 to 24 year olds who are NEET and taking into account that the barriers they face in engaging in education, employment or training;
- councils should work with the Welsh Government to develop their work with young people 19 to 24 to share emerging learning and good practice and ensure that their work and planning align with national priorities and targets; and
- councils should review the expenditure on support for 19 to 24 year olds in their area and if external funding streams are not adequately co-ordinated and aligned with their strategies this should be raised with the Welsh Government in their regular meetings.

To achieve long-term improvements in outcomes for those currently most likely to be NEET.

R3 Young people who are NEET face a range of different barriers to participating in education, employment or training. Young people who are disabled, chronically ill, have special educational needs, attend poorly at school and attain poorly as well those from some ethnic minority groups are more likely to become NEET. Young parents have a high rate of disengagement. However, most councils do not distinguish between those who are sustained or core NEETs and those who are only temporarily out of education, employment or training in their strategic objectives or in any target set. Focusing on young people who are sustained NEETs will result in the greatest savings to the public purse. To achieve successful outcomes for those young people hardest to engage in education, employment or training, councils should:

- Differentiate their work on reducing disengagement to clearly focus on young people who are sustained NEET, to avoid the risk that councils could achieve their objectives without impacting on those furthest from the labour market.
- Councils' strategic documents should make specific reference to the work with young people at high risk of being NEET, including those young people with protected characteristics under the Single Equality Act 2010 and teenage parents; and councils should consider their arrangements for specifically reporting outcomes for these groups.

To ensure that councils, their partners and the Welsh Government are working towards shared targets and objectives for reducing the number of young people who are NEET.

R4 Councillors and local government officials generally demonstrate a high level of commitment to reducing the number of young people who are NEET. There is a high level of understanding of the risk factors and the social costs of being NEET. However, we found that councils had not all developed targets for reducing the number of young people NEET against which their performance could be scrutinised. Where targets have been set, they are inconsistent in their focus and do not always align with the Welsh Government's targets. To establish targets and ensure that councils and partners can be held accountable for performance:

- councils need to develop SMART targets that demonstrate progress towards the goals and enable both the council and their delivery partners to be held to account for their performance; and
- councils should ensure that their targets clearly align with national measures and targets and action plans to ensure that local objectives and targets reflect national priorities sufficiently.

To exercise their responsibility for leading youth services for 16 to 24 year olds.

R5 Under *Extending Entitlement: supporting young people in Wales (2000)* and subsequent guidance, councils have clear responsibility for leading and co-ordinating youth services for 16 to 24 year olds. As such, the Welsh Government's Framework makes it clear that councils are accountable for delivery of services for reducing the proportion of young people NEET. However, we found that councils were not always clear about their responsibilities, especially for young people 19 to 24. While officials and members recognised that councils have many opportunities to shape policies and outcomes for 16 to 18 year olds, some expressed concerns about councils' ability to influence improvements for 19 to 24 year olds where other organisations have a greater role, including the Welsh Government, and the DWP. To better exercise their responsibility for youth services for 16 to 24 year olds, councils should:

- provide training for Members to enable them to more fully understand and exercise their responsibility under *Extending Entitlement* for leading and being accountable for youth services for 16 to 24 year olds; and
- clarify the range of providers and organisations engaging with 19 to 24 year olds - including the DWP - to better placed to develop effective approaches to reducing the number who are NEET locally and ensure that effective local youth services are available for the age group.

To evaluate the impact of the framework and spread good practice

R6 There has been a lot of research on the causes of young people becoming disengaged from education, employment or training. However, there is less clear evidence on the effectiveness of particular interventions and, in particular on the value for money of the large number of projects and programmes working with the young people who are NEET or at risk of becoming so. Few councils systematically review the effectiveness of their work with young people who are NEET or at risk of becoming so. To provide evidence on the effectiveness work being undertaken and its value for money, councils should:

- evaluate the effectiveness of their approach to identifying those at risk of becoming NEET, taking account of good practice guidance published by the Welsh Government in January 2014;
- discuss plans for local evaluations of projects and programmes funded by the council and the third sector with the aim of establishing comparable outcomes and outputs so that councils can assess the relative effectiveness of interventions with young people;
- work with the Welsh Government, the Welsh European Funding Office and other partners to develop a methodology for assessing the value for money of projects and programmes, including the social and economic costs, which councils and their partners can use in their own evaluations; and
- incorporate an assessment of interventions on subgroups of young people with the NEET population in monitoring data and evaluations.



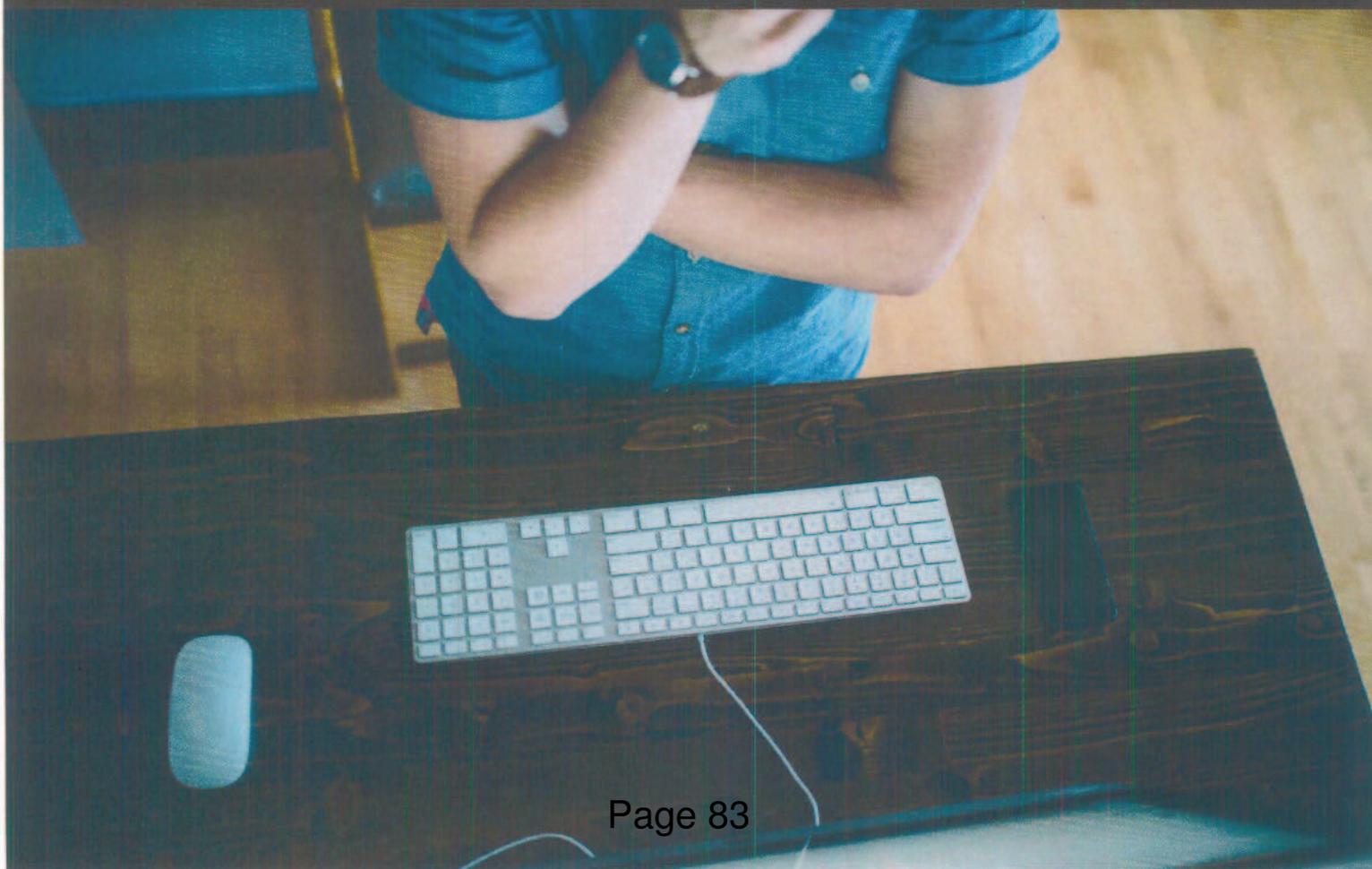
10 July 2014

Archwilydd Cyffredinol Cymru
Auditor General for Wales

Young people not in education, employment or training



WALES AUDIT OFFICE
SWYDDFA ARCHWILIO CYMRU



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with the Government of Wales Act 2006.

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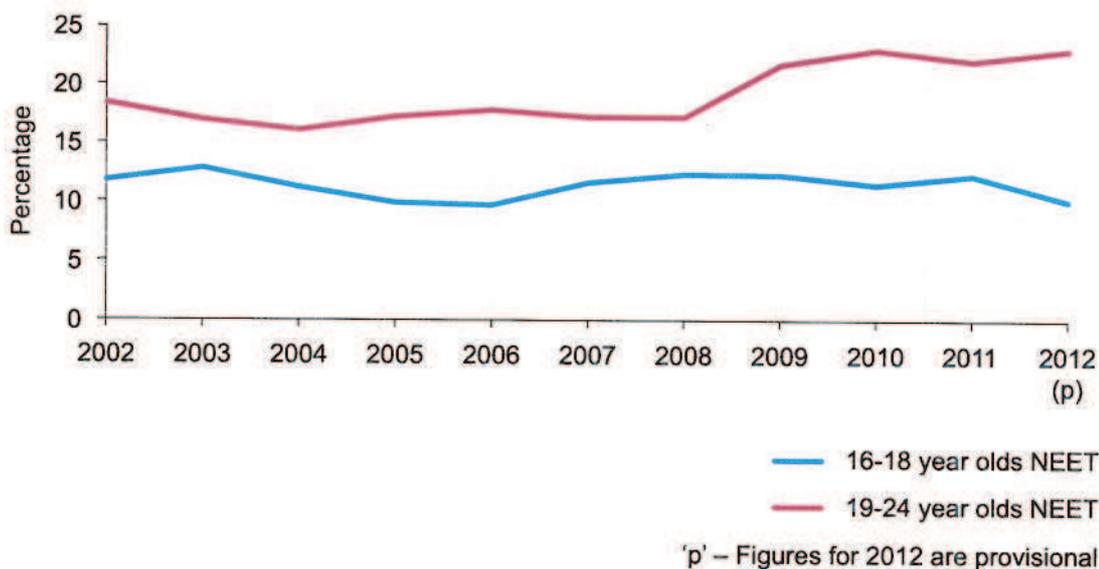
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Summary

- 1 Enabling young people to find productive pathways to the world of work is fundamental to achieving a prosperous and sustainable Wales. Young people not engaged in productive activity are at greater risk of sustained periods of unemployment, lower wages or suffering poorer health and are more likely to engage in criminal behaviour than other young people. A sustained period not in education, employment or training (NEET) does not just affect individuals but also leads to considerable costs to the public purse.
- 2 For many years, the proportion of young people aged 16-18 in Wales NEET has hovered between 12 and 13 per cent although it fell to 10.2 per cent of the age-group at the end of 2012 (provisional figure). This represents 11,600 young people and is the lowest figure since 2006 and the second lowest since 1996. Conversely, the number of

19-24 year olds who are NEET reduced between 1996 and 2006 but has steadily risen since 2008¹. At the end of 2012, 23 per cent (59,900) of 19-24 year olds were NEET (Figure 1). Among 16-18 year olds, young men were more likely to be NEET than women: 12 per cent of men 16-18 years old were NEET compared to eight per cent of women. Among 19-24 year olds the pattern was reversed: 25 per cent of young women were NEET at the end of 2012 compared to 22 per cent of men. This older group contains a significant proportion of young people with caring or family responsibilities or who are unable to work because of a long-term health problem or disability. The characteristics of young people at higher risk of being NEET are discussed in Appendix 2 together with details of the various data sources that inform our understanding of this group of young people.

Figure 1 – The numbers of 16-18 year olds who are NEET in Wales has remained fairly stable over the past 15 years while the numbers of 19-24 year olds who are NEET has risen sharply since 2008



Source: Welsh Government statistics, 2013

¹ The term NEET was first used by the UK Government in the mid-1990s to refer to 16-18 year olds. At that time 19-24 year olds were classed as unemployed. The term is now used more widely to include 16-24 year olds (Appendix 2).

- 3 Survey data suggests that reduction in the numbers of 16-18 year olds in 2012 who are NEET masks a more complicated story: the number of young people NEET at 16 has fallen but the numbers NEET at age 18 and above generally risen. Welsh Government statistics show that the proportion of 16 year olds who are NEET fell from 6.6 per cent over the period 2009-2011 to an average of 4.7 per cent in the period 2011-13 whereas the proportion of 18 year olds NEET rose from 18.4 per cent to 21.0 per cent over the same period². There are significant variations in the proportion of 16-18 year olds who are NEET across areas of Wales (Table 4, Appendix 2).
- 4 Over time, there have been changes in the destinations of young people so that 16 year olds are more likely to stay in education: 86 per cent of 16 year olds continued in full-time education in 2013 compared to 74 per cent in 2004. The proportion entering employment has fallen and in 2013 only 1.4 per cent of year 11 leavers entered in employment at age 16 compared to nearly seven per cent in 2004. The proportion entering work-based learning has remained fairly steady over the period at around seven per cent of year 11 leavers (Table 6, Appendix 2).
- 5 There is a lot of research evidence about the characteristics of young people at high risk of becoming disengaged. The Welsh Government's *Young people engagement and employment review and action plan* (2011) highlighted the higher risks faced by: care leavers; those with poor education attainment; those with a history of

school exclusion or poor attendance; those who have come into contact with the youth justice or addiction services; young people with disabilities; those with mental health issues; and teenage mothers. Other factors such as claiming free-school meals and having parents who do not support their education are also associated with a higher likelihood of being NEET subsequently. This points to the complexity of barriers that some young people face to engaging in education and the range of interventions that may be required to enable them to participate in the future.

- 6 Other research³ suggests that there are up to three groups within the NEET population in terms of the degree of their disengagement from education, employment or training. It is estimated that about 40 per cent of the NEET population are 'sustained' or 'core NEET' who are out of education, employment or training for a prolonged period and usually face multiple barriers to re-engaging. The other large group in the NEET population are those who classed as 'cyclical', 'in transition' or 'open to learning' who make up around 40 per cent of the group. These young people are positive about education and training and are likely to re-engage in the short-term. Research estimates that the final 20 per cent of young people who are NEET are 'floating', 'at risk' or 'undecided' with no particular barriers to engagement but who are either unhappy or undecided about the options available to them. Again these young people might need advice and some support to re-engage but may not require substantial support.

² Welsh Government (2013) *Young people not in education, employment or training (Year to 31 December 2013)* Statistical Bulletin 41/2014 Table 3. Figures are from the Annual Population Survey and are three year averages.

³ Welsh Government (2013) *Identifying Young People at Risk of becoming 'Not in Employment, Education or Training'*, Social Research 60/2013

- 7 Survey data suggests that the proportion of young people 16-18 and 19-24 who are NEET in Wales is above the UK average. (Table 7, Appendix 4). Further afield, the Organisation for Economic Cooperation and Development (OECD) publishes comparisons of the number of young people who are NEET in different countries for 15-24 year olds⁴. In 2012, Wales was in the bottom half of 29 countries. The proportion of young people who are NEET in the UK is similar to the European Union (EU) average (22.9 per cent compared to an average of 22.6 per cent) but well above average for countries in the G7 (15.9 per cent). Differences in the age at which learners finish compulsory education makes comparing NEET rates with other countries difficult, but countries such as Holland, Slovenia and Denmark have lower levels of young people who are NEET than Wales.
- 8 The Welsh Government has long recognised reducing the number of young people who are NEET as one of its priorities and, in recent years, councils have also identified NEET or youth engagement as a local priority. There have been several strategy documents between 2002 and 2011. More recently, in October 2013, the Welsh Government published a *Youth Engagement and Progression Framework and Implementation Plan* (the Framework). This Framework set out a new approach based on implementation of six key elements and two new offers for young people.
- 9 The Welsh Government has set three targets that are associated with reducing the number of young people who are NEET:
- a reduce the percentage of young people 16-18 who are NEET to nine per cent by 2017;
 - b achieve a reduction in level of young people 19-24 who are NEET compared to the overall UK level by 2017; and
 - c increase the proportion of care leavers in education, employment or training at age 19 to 54 per cent by 2017.
- 10 A team from the Wales Audit Office reviewed the new Framework and implementation plan and examined progress in 10 councils across Wales prior to the implementation of the Framework on behalf of the Auditor General. The team considered whether the Welsh public sector is well placed to enable better outcomes for young people who are, or are at risk of becoming, NEET. The Auditor General concluded that **the Welsh Government is well placed to help to reduce the numbers of 16-18 year olds who are NEET but is less well placed to reduce the number of 19-24 year olds who are NEET and determine value for money.**
- 11 The Auditor General also concluded that **councils are clearly committed to further reducing the proportion of young people NEET, especially those aged 16-18, but their planning is variable and councils have made less progress in understanding the costs of services and evaluating the effectiveness of their interventions.**

⁴ Data collected by the OECD on 15-24 year olds. Differences in the definition of "NEET" make national comparisons difficult. The UK Government initially used the term NEET for 16-18 year olds but it is now commonly used for 16-24 year olds. In some countries, especially where young people commonly finish higher education after 24, the NEET group can include people up to 29 www.oecd.org/els/emp/50305438.xlsx

The Welsh Government's approach is based on sound evidence and engagement with councils and other major partners but lacks a thorough understanding of the resources required to meet its objectives

- 12 The Welsh Government has long identified reducing the numbers of young people who are NEET as a priority. It has now built on its previous work to create a Framework that focuses on support for young people aged 16-18 years. Elements of the Framework reflect research evidence from successful approaches to reducing the numbers of young people who are NEET in Wales and elsewhere, including a review of approaches to reducing the number of young people who are NEET in Swansea and Wrexham in 2011. However, there is less evidence that the Framework has been informed by an evaluation of the effectiveness of individual interventions.
- 13 The Welsh Government had a significant level of engagement with councils and other stakeholders including Careers Wales to develop the Framework. However, there has been less consultation with young people themselves, particularly those likely to be furthest from education, employment and training. Similarly, although a number of councils are using innovative techniques to engage with young people, most are not systematically incorporating young people's views and experiences into service planning and delivery.
- 14 We estimate that the combined value of Welsh Government and European spending associated with reducing the number of young people who are NEET was in the region of £200 million in 2012-13. The Welsh Government did not assess the cost of implementing the Framework at the outset. Rather officials have told us that, as the Framework represents best practice, the

Welsh Government's objectives can be achieved by re-focusing existing expenditure on young people who are NEET or at risk of being so. The Welsh Government is taking steps to better co-ordinate its management of resources and expenditure through its own cross-departmental Youth Engagement and Progression Framework Programme Board and other work it is undertaking to realign future European funding to fit better with its priorities for 16-18 year olds. However, services and funding arrangements aimed at reducing the number of young people NEET are complex. The Welsh Government and its partners need review, not just the mapping of needs and services, but also the national and local resources used and their effectiveness to enable it to achieve the best value for money and to adjust the funding arrangements if required.

If implemented successfully, the Welsh Government's Framework and Implementation Plan are likely to improve planning, co-ordination and provision of services to reduce the number of 16-18 year olds who are NEET, but significant risks remain

- 15 The Framework offers the Welsh Government and its partners an opportunity to improve the coordination of services for young people at risk of being NEET and reduce duplication. In the Framework, the Welsh Government seeks to improve the local co-ordination of services by clearly setting out responsibilities for coordinating NEET provision and establishing the new role of 'engagement and progression coordinator' for each council area. The Welsh Government has also taken steps to focus the work of key partners to support the delivery of the Framework including the restructuring of careers services and the development of a new youth work strategy for Wales 2014-2018.

- 16 We found that councils generally welcomed the introduction of the Welsh Government's Engagement and Progression Framework, although some expressed concerns about their capacity to implement the Framework given the financial challenges facing them. The Welsh Government will need to monitor this during its biannual discussions with senior council officials. All 22 councils had produced plans for implementing the Framework by March 2014.
- 17 However, we have some concerns about elements of the Framework:
- a The Framework does not differentiate sufficiently between those young people who are sustained NEET and those who are NEET for a shorter time. This lack of differentiation means that councils could meet the Welsh Government's targets for reducing the number of young people who are NEET by focusing services on those least requiring support to re-engage with education, training or employment. This could represent poor value for money as most of the 'open to learning' and 'undecided NEET' are likely to re-engage without requiring significant support and these groups are less likely to have the most significant costs to society.
 - b The Framework lacks clear information on how the Welsh Government plans to ensure that young people from certain ethnic groups, care leavers, young offenders and young people with a disability who are at higher risk are supported into education, employment and training.
 - c The Framework focuses on young people up to and including the age of 18. Welsh Government officials told us that they believe the actions in the Framework to increase engagement are likely to reduce the number of 19-24 year olds who are NEET but previous research and inspection work has shown that improved outcomes for 16-18 year olds does not always translate into reduced numbers of 19-24 year olds being NEET.
- 18 The crossover in various responsibilities of between the Welsh Government departments and the UK Government's Department for Work and Pensions is an important constraint on work with young people aged 19-24 and for the relatively small number of 16-18 year olds who are in receipt of benefits. The Welsh Government has taken steps to improve communication with the UK Government in this area and councils mostly reported good local working relationships with the Department for Work and Pensions. In some areas, the Department for Work and Pensions works closely with Career Wales to ensure a smoother transition for young people as they begin to claim benefits at age 18, although work is on-going to make these arrangements more consistent across Wales. Claimant data is vital to enable councils and Career Wales to track young people after the age of 18. The Department for Work and Pensions is currently seeking clarity about the legislative position on sharing claimant data so that local areas can be consistent in their approach to data-sharing.

The Welsh Government has clear mechanisms to monitor progress and hold councils and most national stakeholders to account but councils and other partners have not adopted its targets despite being committed to reducing the numbers of young people who are NEET

- 19 The Welsh Government has set out responsibilities for implementing the Framework clearly and introduced a mechanism for holding councils and some other partners to account. However, these plans depend heavily on the Welsh Government's and Career Wales's ability to develop measures of sustained destinations for young people.
- 20 The Welsh Government's approach to holding councils to account will need to reflect changes in the arrangements for delivering education services. During our work with councils, we found that some arrangements for local accountability were unclear; some councils did not have targets and performance measures, and some lacked processes for holding partners to account.
- 21 The Welsh Government has taken steps to make its own departments' accountability for implementing the Framework clearer and to co-ordinate the activities of policy departments through the creation of a Youth Engagement and Progression Framework Programme Board.
- 22 The Welsh Government's Framework and Tackling Poverty Action Plan contain national targets to reduce the number of 16-18 and 19-24 year olds and care leavers who are NEET. The

Programme for Government reports progress in reducing the proportion of young people NEET albeit in a different form. We found that although all the councils made reference to reducing the number of young people who are NEET, the majority have not set measurable targets and, where they have done so, the targets did not reflect those of the Welsh Government.

The Welsh Government has not developed sufficiently clear plans to deliver its commitments to effective evaluation and shared learning and to assess value for money of the substantial public expenditure in this area

- 23 Both the Welsh Government and councils have outlined the social benefits flowing from reducing the number of young people who are NEET but need to do more work to measure these benefits.
- 24 The Welsh Government is committed to evaluation and enabling shared learning although there are a number of challenges to evaluating the impact of the Framework. Our work concluded that despite some monitoring and evaluation of individual interventions by the Welsh Government and at a local level, a lack of routine evaluation meant that there is no overall assessment of the effectiveness of work to reduce the number of young people who are NEET. Neither Welsh Government nor councils have made a thorough assessment of the resources required to achieve improved outcomes for young people who are NEET. This knowledge gap limits their ability to plan from a clear understanding of the costs and benefits of the proposed arrangements.

Recommendations

To better understand expenditure on the services required to deliver the Framework

- R1 We estimate that the combined value of Welsh Government and European spending associated with reducing the number of young people who are NEET was in the region of £200 million in 2012-13. The Welsh Government did not systematically assess the cost of the provision that would be needed to support implementing the Framework at the outset but believes it can achieve its objectives by re-focusing existing expenditure on young people and employment support and implementing best practice. To better understand the effectiveness and value for money of its expenditure, the Welsh Government should:
- a by October 2015, map and review, with partners, the expenditure on services to deliver the Framework to be able to make judgements about the cost effectiveness of this expenditure; and
 - b review whether adjustments are needed between funding streams to better support the effective delivery of the Framework.

To achieve its targets to reduce the proportion of 19-24 year olds who are NEET

- R2 The Welsh Government has set a target in its *Tackling Poverty Action Plan 2012–2016* to reduce the proportion of young people 19-24 years old who are NEET compared to the rest of the UK. The Framework focuses on 16-18 year olds and the Welsh Government believes that improving progression at this age will lead to improved outcomes later. However, work elsewhere has found that councils need to continue support for disengaged young people after the age of 18. We found that many councils are beginning to consider how the approach with 16-18 can be adapted for the greater number of 19-24 year olds who are NEET. This includes developing links with the Department for Work and Pensions locally, which plays a more important role with the age group. To achieve its targets to reduce the proportion of 19-24 year olds NEET, the Welsh Government should:
- a clarify its strategic approach to reducing disengagement among 19-24 year olds and how the Framework is intended to achieve its objective of a long term reduction in disengagement;
 - b work with councils beginning to develop their work with young people 19-24 to share emerging learning and good practice and ensure that councils' work and planning aligns with national priorities and targets;
 - c review its expenditure on support for 19-24 year olds including the extent to which funding streams are co-ordinated and aligned with its priorities in order to assess if current funding is likely to achieve the Welsh Governments targets;

- d examine the cost effectiveness of the measures currently in place; and
- e build on its developing links with the UK Government's Department of Work and Pensions in order to co-ordinate its provision with mandatory provision for longer term unemployed young people.

To achieve long term improvements in outcomes for those currently most likely to be NEET

R3 Young people who are NEET face a range of different barriers to participating in education, employment or training. Young people who are disabled, chronically ill, have special educational needs, attend poorly at school and attain poorly, as well those from some ethnic minority groups, are more likely to become NEET. Young parents have a high rate of disengagement. However the Welsh Government's targets do not distinguish between those who are sustained or core NEET and those who are only temporarily out of education, employment or training despite these groups needing different policy responses. Focussing on young people who are sustained NEET will also result in the greatest savings to the public purse. There is a risk that the Welsh Government's targets could be achieved without improving outcomes for who represent the greatest challenge. To avoid this risk, the Welsh Government should:

- a have greater clarity about its expectations of councils to focus on young people who are sustained NEET and incur the greatest cost to the public sector to avoid the risk that its targets are achieved without impacting on those furthest from the labour market;

- b discuss with councils their implementation plans with specific reference to the needs of young people at high risk of being NEET, including those young people with protected characteristics under the Single Equality Act and teenage parents; and
- c consider its arrangements for reporting outcomes for young people with protected characteristics and teenage parents as outlined in its 2012 Strategic Equality Plan.

To ensure that Welsh Government, councils and their partners are working towards shared targets and objectives for reducing the number of young people who are NEET

R4 Councillors and local government officials generally demonstrate a high level of commitment to reducing the number of young people who are NEET. There is a high level of understanding of the risk factors and the social costs of being NEET. However, we found that councils had not all developed targets for NEET against which their performance could be assessed. Where targets had been established, they did not always align with the Welsh Government's targets. To establish targets and ensure that councils and partners can be held accountable for performance, the Welsh Government should:

- a do more to ensure that local and national measures and targets are more closely aligned by using the biannual meetings and the review of action plans to ensure that local objectives and targets reflect national priorities;
- b encourage councils to develop SMART targets that demonstrate progress towards the goals and enable both the council and its delivery partners to be held to account for their performance; and

- c assess the implications of changes in the delivery of education services following the Hill Review and potential changes in the delivery of public services following the report of the *Commission on Public Service Governance and Delivery on the arrangements to implement its Framework*.

- b develop a methodology for assessing the value for money of projects and programmes which councils and their partners can use in their own evaluations;
- c agree with the Welsh European Funding Office (WEFO) and councils how individual services are evaluated and monitored in a manner that allows comparison between the interventions and enables the Welsh Government to make a judgement about value for money; and
- d incorporate an assessment of the impact of the Framework on sub-groups of young people within the NEET population within monitoring data and any commissioned evaluations.

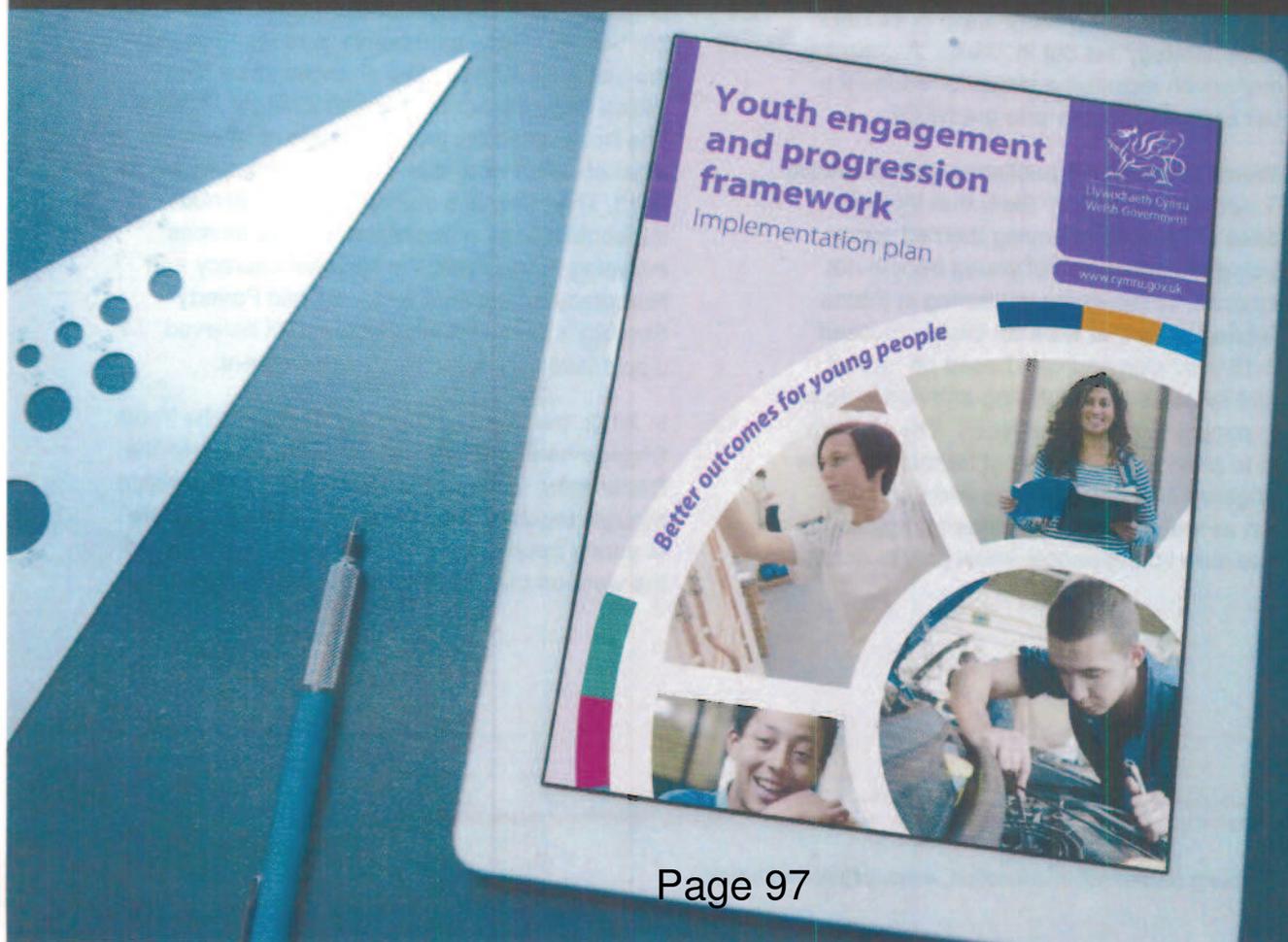
To evaluate the impact of the Framework and spread good practice

R5 There has been a significant amount of research on the causes of young people becoming disengaged from education, employment or training. This has been summarised previously by the Welsh Government and we conclude that the Framework is based on this and evidence of approaches to reducing the number of 16-18 year olds who are NEET in two councils in Wales. However, the evidence is less clear on the effectiveness of particular interventions and, in particular, on the value for money of the large number of projects and programmes working with the young people who are NEET or at risk of becoming so. The Welsh Government has committed to evaluating the impact of the Framework and enabling shared learning, although there are a number of challenges to successfully evaluating its impact and establishing value for money. To provide evidence on the effectiveness of the Framework and its value for money, the Welsh Government should:

- a discuss plans for local evaluations of projects and programmes funded by councils and the third sector in their biannual meetings with the aim of comparable outcomes and outputs so that councils can assess the relative effectiveness of interventions with young people;

Part 1

The Welsh Government's approach is based on sound evidence and engagement with councils and some major partners but lacks a thorough assessment of the resources required to meet its objectives



The Welsh Government has built on previous work to create a Framework with six key elements and two new offers for young people aged 16-18 years

- 1.1 The Welsh Government has long identified reducing the numbers of young people who are NEET as a national priority. Similarly reducing the number of young people NEET has also been historically a priority for councils. However, until recently, the proportion of 16-18 year olds NEET has remained static at around 12-13 per cent.
- 1.2 The Welsh Government's commitment to maximise the education, training and employment of young people was included as part of its 'Extending Entitlement' programme in 2000 which set out the expectations for the delivery of Youth Support Services in Wales. The Welsh Government took this work forward in its 2003 education strategy set out in 'Wales: A Learning Country' which included a target to reduce the number of young people who are NEET.
- 1.3 The Welsh Government published its first specific NEET strategy in 2009 in 'Skills that Work for Wales'. The accompanying themed paper 'Reducing the proportion of young people not in education, employment or training in Wales – delivering skills that work for Wales' focused on 16-18 year olds and was based on having the right systems for identifying and re-engaging young people who become NEET. The strategy aimed to provide a full range of learning options and targeted intensive learning and personal support as well as careers advice and guidance to make sure young people know how to access

education, training or employment and to enable them to overcome sometimes significant personal barriers to participation. In May 2010, the Welsh Government published the report of a task and finish group chaired by Michael Mansfield of Wales TUC that contained an analysis of the main barriers faced by young people who are NEET. Following that report, the Welsh Government suggested a large number of actions to support the 2009 Strategy, including work with disadvantaged individuals and families, post-16 interventions and management to reduce the number of young people who are NEET⁵.

- 1.4 The National Assembly for Wales' Learning and Enterprise Committee examined the Welsh Government's strategy for young people who are NEET in 2010 and made 18 recommendations for improving provision⁶. In January 2011, the then Minister for Children, Education and Lifelong Learning gave details of a new 18 point Youth Engagement and Employment Action Plan 2011-2015, partly in response to recognition that the economic climate had changed since the Welsh Government announced its 2009 Strategy. The Action Plan contained a range of initiatives, most of which were due to be completed by May 2013. The Minister's statement also outlined the contributions of preventative programmes including Flying Start, the National Literacy and Numeracy Framework and the Child Poverty Strategy that the Welsh Government believed would lead to greater youth engagement.
- 1.5 In 2012, the Welsh Government created the Youth Engagement and Employment Division within the Department for Education and Skills. This division brought together different policy areas that relate to young people aged 11-25. The division has led the work on the development of a new approach.

⁵ Welsh Government, *Young People Engagement and Employment Review and Action Plan*, May 2010.

⁶ National Assembly for Wales Enterprise and Learning Committee *Young people not in education, employment or training*, October 2011

- 1.6 In January 2013, the Deputy Minister for Skills made a statement outlining progress against the Action Plan and announcing the transition to a Framework for Youth Engagement and Progression. In April 2013, the then Minister for Education and Skills confirmed that the Framework would be built on six elements:
- a identifying young people most at risk of disengagement;
 - b better brokerage and co-ordination of support for them;
 - c stronger tracking and transitions of young people through the system;
 - d ensuring provision meets the needs of young people;
 - e strengthening employability skills and opportunities for employment; and
 - f greater accountability for better outcomes for young people.
- 1.7 The Framework published on 1 October 2013 is non-statutory guidance that supports Extending Entitlement setting out the Welsh Governments expectations for the successful delivery of targeted youth support services. As such, it builds on actions in the previous plan: for example, the Framework reflects the recommendation in the National Assembly's report that the Welsh Government undertakes work to accurately identify young people at risk of disengaging from education, employment or training (recommendation 6). One of the six strands is to develop an effective approach to early identification, although the Welsh Government guidance on early identification published in January 2014 recognises that the approach will

not be consistent across Wales as some councils have already developed methods to identify those at risk.

- 1.8 The Framework also contains two new offers for young people under 18:
- a **A lead worker** for the most at-risk young people to help ensure that support is delivered in a co-ordinated way and that the package of support meets their needs. Lead workers are expected to be in place in all councils by September 2014. The Welsh Government believes that a lead worker who provides a single point of contact and who can liaise with other agencies should help to ensure their needs are being met and avoid the duplication, overlaps and confusion that many young people experience. The lead worker will usually be either a Careers Wales' advisor or a youth worker. This 'brokerage' role is an important element of the Framework and represents a development on the National Assembly's Committee's recommendation that an engagement or learning coach should be available at any stage in a young person's life to give support on family, financial, education or health issues (recommendation 18). However, unlike most broker arrangements, the lead worker will not have access to individual budgets associated with the young person but will coordinate support from the services available locally.
 - b **A Youth Guarantee** to help ensure that every young person has a suitable post-16 learning place. The Welsh Government intends that young people will be able to take up their offers under the Guarantee in September and October 2015. Some areas have already piloted a similar approach, for

example the 'Swansea Guarantee' provides an offer of education, employment or training to all year 11 (aged 16) leavers in Swansea. The Welsh Government's Youth Guarantee is underpinned by a timeline giving details of support mechanisms available for pupils at different stages during year 10 (aged 15) and 11 (aged 16). It also describes clear roles for schools and Careers Wales. It is seemingly quite similar to the 'September and January guarantees' in England that 16 and 17-year-olds can secure a suitable offer of education or training in school, college or work-based training. In England, the guarantees are associated with the rise in age after which young people are no longer compelled to attend education or training⁷. The Welsh Government has taken a different approach to that of the UK Government: young people will be encouraged to remain in education or training post-16 and making a range of options available but participation is not compulsory. The Welsh Government is currently consulting on its guidance to local authorities delivering the Youth Guarantee including on the option of extending it to young people leaving education at 17 (Year 12)⁸.

The Framework reflects research evidence and an assessment of approaches in two councils in Wales but there is less evidence on the effectiveness of individual interventions

- 1.9 As described above, there have been a significant amount of action over the past decade by the UK Government, Welsh Government, councils and the third sector that have aimed to reduce the number of young people who are NEET. Although, the number of young people who are NEET hovered around 12 per cent for several years, the proportion fell to just over 10 per cent in 2012, possibly as a result of the substantial activity, although no analysis of the causes of this drop has been undertaken to date.
- 1.10 Elements of the Welsh Government's Framework build on factors identified in previous research as present in successful approaches to reducing the number of young people who are NEET in Wales and elsewhere. For example, a review of approaches in 10 English councils with low rates of young people aged 16-18 NEET by Ofsted in 2010⁹ found the most successful areas had well-established measures to identify those at risk. These councils had introduced effective preventative measures such as the careful monitoring of potentially vulnerable individual young people and supporting their transition from primary to secondary school. The review also pointed to the importance of using data well to plan programmes and ensure that resources are targeted at specific groups and neighbourhoods. These elements all feature within the Welsh Government's Framework. However Ofsted

⁷ Following the Education and Skills Act 2008, the age at which young people are no longer required to participate in education or training will rise in England to 17 in 2013 and 18 in 2015. In practice, young people will not be expected to remain in school or traditional academic learning but will be given a suitable offer to continue their education or training which could involve a job or work placement associated with a training element.

⁸ Welsh Government (2014) *Delivering the Youth Guarantee in Wales: Draft Guidance* <http://wales.gov.uk/topics/educationandskills/skillsandtraining/youthengagement/delivering-the-youth-guarantee-in-wales/?lang=en>

⁹ Ofsted (2010) *Reducing the numbers of young people not in education, employment or training: what works and why*

(2010) also found that, where necessary, local areas continued to support young people beyond the age of 18 through to longer-term adult employment, whereas the Framework focuses only on support to age 18.

- 1.11 In developing the Framework, the Welsh Government also drew heavily on the review it commissioned in 2011¹⁰ of work in Swansea and Wrexham Councils to reduce the number of young people under 18 who are NEET. This research identified elements that were important to successful work and we found that work has been sustained since the research was

undertaken (Box 1). Officials from Swansea and Wrexham were involved in discussions around the development of the Framework.

- 1.12 The 2011 research in Swansea and Wrexham identified common characteristics of successful approaches, rather than a formal evaluation of the effectiveness of the specific approaches. Similarly, Ofsted (2010) also identified factors common to areas with low numbers of young people NEET. However, there is less information on the impact of elements of the approach or individual interventions.

Box 1 – Good practice in reducing the number of young people NEET in Swansea and Wrexham Councils was independently reviewed in 2011 and has been subsequently sustained

In 2011, the Welsh Government commissioned a research project to examine the apparent success of work in Swansea and Wrexham councils in reducing the proportion of young people who are NEET. This identified factors believed to be associated with success and which have subsequently influenced the development of the Framework. We visited Swansea and Wrexham to examine the continuing performance in reducing the proportion of young people who are NEET.

We found that both Swansea and Wrexham Councils have been able to sustain their work targeting young people who are NEET or at risk of becoming so. NEET reduction has remained an important strategic objective driven forward by senior leadership and both councils have structures in place to ensure regular reporting and accountability. Both councils described positive working relationships with key partners including schools, further education colleges, work based learning providers and Careers Wales and are increasingly working with the Department for Work and Pensions locally as they shift their attention towards the 18-24 age group. In Swansea, Council staff and partner organisations reported that the local five tier model for engagement, the Swansea Guarantee and online application process were useful for clarifying roles and responsibilities and sharing information around the needs of young people.

Important features of the approach in Swansea and Wrexham include:

- identifying young people at risk of becoming NEET through a combination of practitioner led and data led vulnerability processes. In Swansea, data is collated by the KIT (Keep in Touch) Project Officer who tracks NEET cohorts rather than age groups to identify trends and individual pathways taken by young people;
- exercises to map the provision of services for young people;
- projects to support young people with additional needs and vulnerabilities; and
- a new and increasing focus on the 18-25 age group; through the STARS project for vulnerable young adults aged 16-25 in Wrexham and development of the five tier model approach to target high priority groups in the 18-24 cohort in Swansea.

Both councils continue to develop new aspects of their services. Swansea is developing an e-portal called 'Inform Swansea', which will act as an online market place for training providers including information and support for jobseekers. Wrexham is working to embed the 'Five Tier Model' and develop the identification of those young people at risk of becoming NEET at Year 7.

Source: Wales Audit Office analysis

¹⁰ Efficiency and Innovation Board. *New Models of Service Delivery – A Study of Approaches to Increase the Proportion of Young People in Education, Employment or Training, with a Focus on Potential and Actual Efficiency Savings. Final Report.* Arad Research July 2011

The Welsh Government engaged with councils and other stakeholders to develop the Framework and its supporting Implementation Plan but did not draw significantly on the direct views and experiences of young people

- 1.13 The Welsh Government undertook a substantial programme of consultation with local authorities in the process of developing its Framework. It asked all councils to assess their services and performance against the proposed Framework. The Welsh Government also initiated a series of workshops involving practitioners and officials on aspects of the Framework including brokerage, early identification and accountability. The Welsh Government worked in more depth with eight councils to trial elements of the Framework. However, the whole Framework was not trialled other than in Swansea and Wrexham where the elements had already been in place.
- 1.14 It is important that the experiences of young people inform the design of any approach intended to support young people who are disengaged or at risk of disengagement. Their views and experiences can help to address the barriers that young people face to engaging with education, employment or training. In 2010, in response to a commitment under the One Wales agreement to examine the causes of disengagement, the Welsh Government commissioned a review of research evidence about triggers to becoming disengaged. This found a wealth of research about the causes of disengagement from the UK and elsewhere (Box 2). However, the authors commented that most of the material drew on information from teachers and youth workers rather than young people themselves¹¹.

Box 2 – A range of triggers are associated with young people being NEET

A review of research evidence undertaken for the Welsh Government in 2010 identified a range of factors associated NEET. These include:

- Educational factors including:
 - low educational attainment;
 - difficult transitions from primary to secondary schools;
 - growing frustration with achievement at secondary school;
 - low levels of literacy and numeracy/ability/levels of attainment;
 - unsatisfactory behaviour;
 - poor school attendance;
 - poor experience of school, for example experiencing bullying; and
 - lack of choice in terms of provision and progression.
- Socio-economic factors, including those from low-income families where there is a tradition of adults not participating in employment, training or further and/or higher education and/or not supporting education.
- Parental behaviour and attitudes including:
 - the home learning environment;
 - the caring environment within the home;
 - lack of parental involvement in child's education;
 - Special Educational Needs (SEN); and
 - health issues including disability and mental health.
- Young people's behaviours and attitudes.
- Family and personal circumstances including:
 - challenging family backgrounds;
 - looked after children;
 - teenage pregnancy and young mothers;
 - having caring responsibilities;
 - young offender; and
 - homelessness.

Source: Welsh Government (2010) *Young people Engagement and Employment Review and Action Plan, Annex 6 and pages 16-17.*

¹¹ Lloyd-Jones, S., Bowen, R., Hollom, D., Griffin, T., and Sims, J. (2010) *A qualitative research study to explore young people's disengagement from learning*, Welsh Government SR 04/2010

1.15 In our work with councils, we found a number of innovative examples where councils had used the internet or social media to engage with young people. We also found many examples of councils engaging with young people about their experiences and about their services. However, we concluded that most councils did not systematically incorporate young people's views and experiences into service planning and delivery.

1.16 The Welsh Government has a programme of consultation events called 'the Real Conversation' that aims to bring together young people, employers and practitioners to discuss education, employment or training issues. The events programme is part funded by the European Social Fund. In June 2013, the focus of the event was 'about what we need to do to help and support young people to stay in school, access the right training and other services they need to get the right job for them' and the discussion was planned to inform the developing Framework. Over 100 young people and a further 100 employers, practitioners from training bodies, Welsh Government and other agencies attended. Whilst the evaluation comments from young people were generally positive, our observation was that the event had limited success in engaging with the young people most likely to be NEET. In addition, the style of the events and questions asked were not the most appropriate way of engaging with this group. Some work based learning providers and third sector organisations told us that young people who participated in the event were intimidated by the format.

The Welsh Government's approach is not based on a thorough understanding of current expenditure in this area although it is taking steps to better co-ordinate Welsh Government and European funding

The Welsh Government's approach is not based on a thorough understanding of current expenditure in this area, which we estimate to be in the region of £200 million in 2013-14

1.17 In 2010, the Welsh Government's Task Force on young people's engagement and employment¹² examined the complex funding streams that support work to improve young people's engagement and employment. The Task Force proposed reviewing funding for young people who are NEET to evaluate the effectiveness of the total expenditure. The proposed review would aim to ensure activities and resources are not duplicated, to bring resources together to offer the best service for the child or young person and better control the projects and funding allocations and better co-ordinate Welsh Government and EU expenditure. The Welsh Government has not undertaken such a review to date.

1.18 We examined the funding of initiatives and policy areas that could be said to impact on reducing the number of young people who are NEET. While it is not possible to identify the 'NEET' expenditure as much of this funding is directed towards young people more generally, we estimate that the combined total of Welsh Government and European Social Fund 'NEET related' expenditure is in the region of £200 million in 2013-14 (Tables 1 and 2).

¹² Welsh Government (2010) *Young people engagement and employment action plan*, May 2010 Annex 5 and Recommendation 4a

1.19 The Welsh Government's employment related expenditure includes a range of funding to provide support for skills and workforce development and to increase job opportunities and work experience. Much of the expenditure on apprenticeships (over £15 million) and on Jobs Growth Wales (£12.5 million) is targeted at moderate to high achieving young people up to age 24 and is therefore not included in our calculation of NEET related expenditure. Other programmes – such as traineeships - are more closely associated with supporting young people who are, or are at risk of being, NEET. Expenditure on these programmes

was just over £20 million in 2013-14. A range of other services, grants and programmes are focused on helping schools further education and training providers to improve outcomes for those from deprived communities, to support young people directly or the services that provide support. These include the Pupil Deprivation Grant, Educational Maintenance Allowance and Financial Contingency Fund and the funding for Careers Wales. The Welsh Government's expenditure on these areas totalled £166 million in 2013-14 (Table 1).

Table 1 – The Welsh Government's budget for 'NEET related' programmes in 2013-14 totalled £166 million

Programmes and expenditure	2013-14 £ millions
Employment related	20.2
Young recruits subsidy	2.3
Traineeships 2011-2014	6.1
Steps to employment	9.2
Pathways to Apprenticeship	2.6
Education related	146.0
Pupil Deprivation Grant and Communities First Match Fund	35.2
Careers Wales	30.0
School Effectiveness Grant (including looked after children)	28.8
Educational Maintenance Allowances	26.2
Part-time grants and fees	11.3
Financial Contingency Funds	9.0
Youth Services Revenue Grant	3.8
Other Youth Engagement and Employment	1.7
Total expenditure	166.2

Source: Welsh Government data, Wales Audit Office analysis

1.20 European Union financial support through the European Social Fund has supported an extensive range of projects during 2007-2014 to equip young people with the skills needed for employment. The WEFO manages this expenditure. Most of these projects and programmes have been funded for periods of between three and five years. To date, the majority of young people benefitting from these programmes are disaffected learners in school who are at risk of becoming disengaged. Some of these projects, such as the £21 million 'Engage' project in South West Wales ended during

2012-13. Funding awarded to some of the main schemes that are relevant to reducing the number of young people who are NEET and which continued in 2013-14 totalled £132 million. It is likely that this represents annual expenditure in excess of £40 million each year (Table 2).

Table 2 – The European Social Fund supported an extensive range of projects for young people who are NEET or at risk of becoming in 2013-14

European Social Fund supported projects operating in 2013-14	Total funding (over 3-5 years) £ millions
Welsh Government managed programmes, including: <ul style="list-style-type: none"> • Reaching the Height – 'First Footholds' and 'Routes to the Summit' • World Class Traineeships • Minority Ethnic Learning & Achievement Project 	
Other projects, including: <ul style="list-style-type: none"> • Building the Future Together • PRE-VENT • Potensial • Pupils Understanding their Problems In their Locality • Raising skills and aspirations of Black and Minority Ethnic People II 	
EU Funds	75.4
Match Funds	56.6
Total	132.0
Estimated annual funding	40.0

Source: Welsh Government data, Wales Audit Office analysis

The Welsh Government did not consider the cost of achieving all of its targets but believes that refocusing existing funding should be sufficient to meet its objectives for 16-18 year olds

- 1.21 The Welsh Government produced a business case outlining the impact, funding, affordability, and management arrangements for delivering the Framework in July 2013, after Cabinet endorsed the approach in February 2013. The Welsh Government did not calculate the cost of implementing the Framework. Rather, because the Framework represents best practice rather than new demands, the Welsh Government believes that it can meet its objectives by refocusing existing funding streams more tightly and in accordance with best practice. It has, for example, refocused the priorities of Careers Wales and emphasised to councils and further education institutions the importance of reducing the numbers of young people who are NEET as part of the tackling poverty priority. The funding streams are complex and include the Pupil Deprivation Grant, youth services allocation in the Revenue Support Grant and funding from the 14-19 learning pathways. Mapping resources, as well as services at a national and local level, would helpfully enable a more complete understanding of the expenditure on services to deliver the Framework.
- 1.22 The Welsh Government has modelled the financial implications of achieving one of the Welsh Government's targets, that of reducing the number of 16-18 year olds who are NEET to nine per cent by 2016. Compared to 2011-12, the Welsh Government estimated that achieving the target would have the effect of moving 4,500 young people into education or training at an adjusted cost (ie, including inflation) of £27.4 million in 2016/17. The Framework's business case states that this would be affordable within

its budget at that time because the increase in those education would be offset by demographic changes which will reduce the numbers of 16-18 year olds in Wales during this period.

- 1.23 The 2013 Welsh Government budget protected further education expenditure for 16-18 year olds but at its current level. However, if the proportion of 16-18 year olds who are NEET falls lower than the nine per cent target, financial modelling suggests that the Welsh Government's current funding would not be sufficient to meet the extra education and training places that would be required. Each additional one per cent increase in engagement would require around £5 million of funding.
- 1.24 The Welsh Government has not estimated the cost of achieving its NEET targets for 19-24 year olds or care leavers. It recognises however that its reduced funding for further education for adults could make it difficult to encourage 19-24 year olds back into further education. It has also not costed the option of extending its Youth Guarantee to 17 year olds, which it raised as a possible option in draft guidance on implementing the Youth Guarantee in January 2014.
- 1.25 The business case does not include a reference to the risk that by better identifying young people at risk and offering intervention, the Framework results in an increase in demand for services, including health and social services and learning support. Some of these services are already stretched: for example, reports from NHS Wales acknowledge the vital importance of early identification and intervention for adolescents who are experiencing serious mental health issues but also repeatedly highlight that there is insufficient provision of child and adolescent mental health services and confusion over appropriate provision for young people as they approach adulthood.

The Welsh Government is taking steps to co-ordinate Government and European funding in this area

1.26 Several Welsh Government departments provide funding for services associated with young people who are NEET: the Department for Education and Skills, which has lead responsibility for the Framework; Communities First, who provide employability projects in deprived communities and early interventional work through the Families First programme; and the WEFO. In July 2013, the Welsh Government established a Youth Engagement and Progression Framework Programme Board, chaired by the Director of Skills, Higher Education and Lifelong Learning (SHELL). The Board consists of representatives from key policy areas to ensure co-ordination across Welsh Government divisions and branches in the delivery of the implementation plan including managing and co-ordinating the finance and resources available.

1.27 European Union funds support a raft of interventional projects. However, different definitions of NEET and 'young people at risk' used by the European funding criteria make it difficult to monitor the impact of these interventions. A succession of reviews has identified possible duplication in projects because of a lack of co-ordination in European and other funding¹³. In our work with local authorities, we identified areas where provision appeared to be determined by available funding, rather than local need, and where councils identified gaps in provision. The Welsh Government recognises that funding could be better co-ordinated and is taking some steps to achieve better value from the funding streams:

- a The implementation plan for the Framework recognises that work is needed to co-ordinate Welsh Government and European funding to ensure that there is no duplication and that European Social Fund investments between 2014 and 2020 are aligned with the Welsh Government's priorities for reducing the numbers of young people NEET or most at risk. For example, the Welsh Government plans to develop a project for employer engagement as a priority for future European funding by March 2014 having identified that many councils struggle to engage with local employers. Work to identify priorities and streamline the allocation process was completed in September 2013 to support the second round of European funding funds from April 2014.
- b Requiring bidders for 2015-2018 work-based learning contracts to demonstrate that they have engaged with local 14-19 networks to ensure that proposals meet identified local employment needs. This aims to reduce the perception that work-based learning that is developed by national contracts does not always meet local labour market needs.
- c Using the results of local mapping exercises to ensure that provision funded from other funding streams meets gaps in local needs rather than duplicating existing provision.

¹³ National Assembly for Wales Enterprise and Learning Committee (2010) Young people not in education, employment or training. The Committee reported that the availability of European funds had resulted in a proliferation of agents and projects working with the client group in some areas, some duplication of services and examples where European funded projects did not match with Welsh Government priorities (paras 95-99).

Part 2

If implemented successfully, the Welsh Government's Framework and Implementation Plan is likely to help to reduce the overall number of 16-18 year olds who are NEET, but significant risks remain



Implementing the Framework has the potential to improve the co ordination of services and reduce duplication

- 2.1 In our work in eight councils, officials and councillors expressed concerns about the extent to which councils were able to exercise their strategic responsibilities for leading and co-ordinating services for young people, especially for 19-24 year olds. Some councils recognised that more could be done internally and with partners to raise awareness of their statutory responsibilities towards 16-24 year olds generally and, in particular, for care leavers. The Welsh Government's Framework supports this by clearly setting the responsibility for reducing the number of young people who are NEET within the context of councils' statutory responsibility to co-ordinate youth services as set out in the guidance on *Extending Entitlement: services and support for 11-25 year olds in Wales* (2002).
- 2.2 In the Framework, councils have responsibility for identifying the services required to reduce the number of young people who are NEET and co-ordinate the provision of these services. Most councils had undertaken exercises to identify the needs and whereabouts of young people who are NEET or at risk of becoming so. Some of these exercises still lacked detail on the local profile of young people who are NEET, for example by failing to distinguish young people taking a planned break ('gap year') from education or employment from sustained NEET. Generally, however, we concluded that councils' planning was built on a foundation of good local understanding of the needs and whereabouts of young people.
- 2.3 Several councils that we visited have already mapped the full range of provision for young people who are NEET in their area. These mapping exercises include not only projects funded by the council but also by the Welsh Government, European Social Fund, the Big Lottery and a range of charitable organisations. In some areas, this revealed large numbers of organisations working in some capacity with young people who are NEET or at risk of becoming so. Councils should have a full picture of post-16 school and further education opportunities but some told us that it was difficult to keep up-to-date with the full range of Welsh Government funded work-based learning, apprenticeships, job vacancies and opportunities through Jobs Growth Wales for 16-24 year olds as well as with programmes provided by the third sector, some of which are relatively short-lived.
- 2.4 These mapping exercises provide a picture of the volume and type of provision available in the area and have revealed some duplication in services for specific groups. Conversely, the exercises have highlighted gaps in provision: in Cardiff, officials were concerned about the limited number of places available for young people requiring help with English for speakers of other languages (ESOL), and in Wrexham the demand for ICT and practical courses outstrips supply.
- 2.5 The Framework identifies a role of 'engagement and progression co-ordinator' to provide operational leadership and work closely with Careers Wales and other providers. We found that many councils had already appointed an official into a similar role (for example, a 'NEET co-ordinator' or similar) albeit at differing levels of seniority during our fieldwork in July 2013. At that

time, the councils reported that appointing a lead official was important in focusing and driving work to reduce the proportion of young people who are NEET. All councils in Wales had appointed a Senior Accountable Officer responsible for implementing the Framework locally by March 2014.

The Welsh Government has taken steps to focus the work of key partners to support the delivery of the Framework

- 2.6 The Framework clearly identifies important roles for both Career Wales and the youth service in delivering the Framework. The restructuring of careers services in Wales means that Career Wales is now better placed to fulfil the roles envisaged for it in delivering the Framework. In 2009, Estyn published a comparative analysis of the performance of careers services which raised concerns about differences in standards across Wales¹⁴. In 2013, the six careers companies were merged into Careers Wales, a single body set up as a wholly owned subsidiary of the Welsh Government. This change has clarified the accountability of Careers Wales, where responsibility lies within the Welsh Government's Youth Employment and Engagement Division.
- 2.7 Changes in the level of service offered by Careers Wales have had the effect of focusing its resources on those furthest from the labour market. From April 2013, all adults and young people continue to have access to careers services online and on the telephone but face-to-face guidance will be offered to individuals most in need, including 14-16 year olds identified at risk of disengaging and unemployed 16-24 year olds. Careers Wales has developed a 'Five-tier' model for identifying risk of disengagement, improved

tracking of young people, improved destination measures post 16 and 18 and a new common application process for post-16 options which is being trialled from September 2013. Schools have taken on responsibility for general careers advice and guidance. However, questions about the quality of careers advice for the majority of pupils remain: Estyn concluded in May 2014 that the majority of schools do not offer up-to-date and impartial advice on courses, career and progression routes to their pupils. It concluded that schools are generally struggling to replace the service previously provided by Careers Wales. Most schools do not offer one-to-one careers guidance to all learners at the important transition points of year 9 and year 11¹⁵.

- 2.8 The Welsh Government also recognises the potential for a re-invigorated youth service to undertake a strategic role in delivering the Framework locally. It issued a new National Youth Work Strategy for Wales 2014-15¹⁶ in March 2014 following a consultation exercise from June to September 2013¹⁷. The strategy highlights four outcomes against which youth services will be judged:
- a young people in Wales continue to have access to diverse informal and non-formal learning opportunities;
 - b a strengthening of the strategic relationship between youth work services and formal education nationally;
 - c a better and more consistent youth work offer to young people from organisations in the statutory and voluntary sector; and
 - d the creation of a solid evidence base that captures the outcomes and impact of youth work.

¹⁴ Estyn (2009) *A comparative analysis of the performance of Careers Wales 2005-2008* Submission to the Review of the Careers Services in Wales.

¹⁵ Estyn (2014) *Leamer support services for pupils aged 14-16* Thematic review

¹⁶ Welsh Government (2014) *National Youth Work Strategy for Wales 2014-15*

¹⁷ Welsh Government (2013) *A vision for a national youth work strategy for Wales 2013-18*, page 5

2.9 In the new Strategy, the Welsh Government recognises the potential of targeted youth work to support positive outcomes for young people in education and training. It also recognises that too often youth services have been regarded as peripheral. The Framework provides an opportunity for youth work organisations to become more joined up with education and support services and gives them a clear role as lead workers for young people not engaged with education, employment or training or those at high risk of dropping out. It also recognises the ability of youth workers to contact and engage with young people not in contact with statutory services (Box 3). However, the focusing of youth services on supporting the delivery of the Framework will require not only agreement from councils and from the wide range of other organisations that provide youth work services¹⁸, but also changes to the culture of youth services. Across Wales, local authority areas vary both in the mix of statutory and voluntary bodies providing youth services and in the overall level of services available. Therefore the strategy will inevitably take some time to take effect, even if all of the bodies providing youth services accept the principles underlying it.

¹⁸ At a local level youth services are provided by a mix of statutory and voluntary bodies including national youth work organisations, local organisations and uniformed youth services. The precise nature of service delivery varies across councils as does the overall amount of provision.

Box 3 – The Welsh Government envisages a clear role for youth workers and Careers Wales advisors engaging with young people who are hard to reach in its Framework’s implementation plan

The Framework sets out a five tier model of engagement outlining the level of support available to young people based on their assessed level of risk of disengagement from education, employment or training (EET)

Risk of disengagement	Client group	Lead worker
Tier 5 Young people in education, employment or training	Young people are in sustained EET. Either working or studying for at least 16 hours (can include voluntary work).	No lead worker necessary given that young person is in EET and not at risk of disengaging.
Tier 4 Young People at risk of dropping out of EET	Those judged as ‘At risk’ are: <ul style="list-style-type: none"> • young people in post-16 education or training who were identified at risk of either disengaging or not making a positive transition pre-16; • those whom Career Wales has been made aware of as at risk of dropping out of EET; and • those engaged in less than 16 hours of EET. 	Depends on level of risk of dropping out: <ul style="list-style-type: none"> • low and medium risk – provider pastoral systems and/or allocation of learning coach as a lead worker; • high risk – may be allocated lead worker from Youth Service or Careers Wales; and • Team Around the Family will decide the appropriate lead worker if Families First are already involved.
Tier 3 Unemployed 16 and 17-year-olds known to Careers Wales	Unemployed young people who are either engaged with Careers Wales and/or known to be actively seeking EET. They may either be ready to enter EET or assessed as requiring career management or employability skills support to enter EET.	All of the cohort will be allocated a lead worker, in most cases from Careers Wales.
Tier 2 Unemployed 16 and 17-year-olds, known to Careers Wales, who are not available for EET	Young people may be unable to enter EET because of ill-health, disability, pregnancy, caring responsibilities or other significant barriers to engaging. This group also includes those in custody.	These young people require intensive support. All of the cohort will be allocated a lead worker, in most cases from the Youth Service.
Tier 1 Unknown status on leaving Careers Wales services	Young people whose whereabouts and/or status is unknown.	Individuals will be allocated to appropriate tier when they are identified. The Youth service can play an important role identifying young people not in EET.

Source: Adapted from Welsh Government (2013) Youth engagement and progression Framework

Some councils have expressed concerns about their capacity to implement the Framework given their current financial challenges, which the Welsh Government will need to monitor over time

2.10 Generally, we found that councils welcomed the introduction of the Welsh Government's Framework. Some of our fieldwork councils were also involved in the Welsh Government's preparations for the Framework and had already begun to update their strategies in the light of the emerging Framework. For example, Caerphilly County Borough Council had incorporated the proposed 'lead worker' role into seven new learning coach posts as a key aspect of their NEET approach. Cardiff Council designed its NEET Strategy to take account of the new Framework. The Cardiff 'Transition, Engagement and Progression Strategy for Young People 11-24' is based on the principles of clear data and early identification of young people at risk of disengagement. Carmarthenshire and Pembrokeshire Councils developed a joint NEET Action Plan in response to the Framework in October 2013.

2.11 However, some councils expressed concerns to us about their capacity to deliver the Framework given the financial challenges facing them. Following the Minister's announcement of the Framework, the Welsh Government developed a business case supporting the approach. The Business Case stated that, because the Framework represented best practice, councils

should be able to deliver the services required from existing budgets. The Welsh Government argued that councils could achieve this by reducing duplication, better targeting of provision following their work to map services and the needs of their young people and by 're-purposing' existing funds to focus expenditure on young people who are NEET and children and young people most at risk. The Business Case does however recognise that capacity and reduced future funding are risks to successful delivery and this is included in its risk register (as of October 2013). All 22 councils submitted an action plan for implementing the strategy by the end of March 2014 and officials will monitor issues of funding closely in their subsequent discussions with council leaders.

The Framework does not differentiate sufficiently between young people who are NEET leading to a risk that action focuses on those least requiring support

2.12 Previously, the Welsh Governments strategies and action plans have discussed, sometimes at length, the characteristics of those with a high risk of becoming NEET. Its 2010 Action Plan, for example, distinguishes between: those who are NEET for a long period ('core' NEET); those who may be out of education, employment or training for a short period but subsequently re-engage with learning or work; and those who are inactive perhaps because of ill health or disability or caring responsibilities including early parenthood. More recently, research by the Welsh Government identified three distinct categories of young people who are NEET (Box 4).

Box 4 – The Welsh Government has drawn on research to differentiate between young people who are NEET on the basis of the barriers they face to engagement

The Welsh Government (2013) drew on research evidence to differentiate young people who are NEET based on their attitudes to education, employment and training and barriers they experience to engaging in education employment or training. This research identified three groups within the population of young people who are NEET:

- Open to learning, cyclical or in transition: young people who are likely to re-engage in education, training and the workforce in the short term, tending to have higher attainment and a more positive attitude to exploiting opportunity.
- Floating, 'at risk' or undecided: young people who may be dissatisfied with available opportunities or are most vulnerable to economic downturn. This group also includes those young people who lack direction and/or motivation and tend to move in and out of the NEET group.
- Core or sustained: young people experiencing longer-term disengagement in education, training and the labour market. For these young people, disengagement is often linked to a wider pattern of poor attainment and experience.

Source: Welsh Government (2013) *Identifying Young People at Risk of becoming 'Not in Employment, Education or Training'*, Social Research 60/2013

2.13 A similar analysis by the National Foundation for Educational Research (NFER 2009)¹⁹ estimated that around 40 per cent of NEET were 'sustained NEET'. A further 40 per cent are 'open' to learning and 20 per cent are 'undecided'. Each segment within the NEET population requires a different policy response to help them re-engage with education, employment or training²⁰.

2.14 Applying this analysis to Wales would suggest that there are currently around 4,600 16-18 year olds who are sustained NEET. However, neither the Framework nor the national targets for reducing the proportion of 16-18 year olds who are NEET differentiate between these sub-groups within the total NEET population. As a result there is a risk that the Welsh Government could meet its targets for reducing the number of young people who are NEET by focusing activities on young people in the 'open to learning' or 'floating' groups without impacting on 'core NEET' who represent the greatest challenge. As many young people may re-engage with education, training

and employment without requiring significant intervention, this could represent poor value for money.

2.15 The Welsh Government Strategic Equality Plan launched in January 2012 recognises that some young people are more likely to become NEET. It sets an objective to reduce the over-representation of certain ethnic groups, care leavers and of disabled people among those who are NEET²¹. Data from the Welsh Government shows that young people who are disabled are particularly likely to be NEET: 19.6 per cent of 16-18 year olds and 42 per cent of 19-24 years olds with a disability are NEET compared to 11 per cent of 16-18 year olds and 19 per cent of 19-24 year olds without a disability²². The plan details a range of activities that the Welsh Government is undertaking to better support these young people to engage in education, employment or training. Although the Strategic Equality Plan reports that responsibility for many of these actions lies within the Youth Employment

19 Spielhofer, T., Benton, T., Evans, K., Featherstone, G., Golden, S., Nelson, J. and Smith P. (2009) *Increasing Participation: Understanding Young People Who Do Not Participate in Education or Training at 16 and 17* (DCSF Research Report 072). London: DCSF.

20 Nelson, J and O'Donnell, L. (2012) *Approaches to Supporting Young People Not in Education, Employment or Training: a Review* (NFER Research Programme: From Education to Employment). Slough: NFER.

21 Welsh Government, 2012. *Strategic Equality Plan and objectives 2012-2016*

22 Welsh Government, Young people not in education, employment or training (NEET) (Year to 31 December 2013) Statistics Bulletin 40/2014

and Engagement Division, the commitments are not repeated within the Framework and it is unclear if they will feature in discussions with councils and their action plans. The Welsh Government's own equality impact assessment of the Framework suggests that its introduction will improve the position of young people generally and that local authorities will be required to demonstrate how they have ensured provision including those with protected characteristics as well as care leavers and young offenders²³. However, the plan is not clear on the steps it will take to ensure this detailed planning occurs and to report on progress.

The Framework focuses on work with pre-16s learners and 16-18 year olds and it is not clear if this will be sufficient to achieve the Welsh Government's objectives for 19-24 year olds

- 2.16 The Welsh Government's Framework concentrates on young people up to, and including, age 18. However, in recent years, the number and proportion of 16-18 year olds who are NEET has fallen while the number of 19-24 year olds who are NEET has increased from 17 per cent in 2008 to 23 per cent in 2012 (Figure 1).
- 2.17 We found that most councils' planning and activity to date has also focused on young people aged 16-18. Pre-16, most councils were able to demonstrate some work to identify those pupils most likely to make a poor transition at 16 and offering support and guidance in Year 11 and sometimes earlier. However, the majority of the councils that we visited in summer 2013 were beginning to look at improving outcomes for young people aged 19-24. For example, Swansea

Council is developing a NEET Strategy for 19-24 year olds with key partners in Careers Wales, Job Centre Plus, further education institutions and work based learning providers. This work is informed by a series of workshops delivered by Kafka Brigade UK to understand key issues affecting this cohort. Early indications are that the Strategy will develop the 'five tier model' approach to identify at risk individuals aged 19-24. It is also likely to include a pilot project to target high priority groups.

- 2.18 Other councils were planning to adapt the work that they undertook to identify and support young people at risk of disengagement at 16 to work with the older group. However, we have some concerns about the viability of taking a similar resource intensive approach to 19-24 year olds who are NEET because of the larger numbers of young people in that age group and the different range of interventions available.
- 2.19 The Welsh Government told us that they believe the actions in the Framework to increase engagement are likely to reduce the number of 19-24 year olds who are NEET by raising skills and qualifications and equipping young people for further and higher education or employment before they reach 19. Officials recognise that the Welsh Government has less influence over the numbers of 19-24 year olds NEET, in part because this is more affected by labour market conditions more generally.
- 2.20 However, previous research and inspection work has concluded that improved outcomes at 16-18 does not always translate into reduced numbers of 19-24 year olds being NEET. For example, the Audit Commission (2010)²⁴ observed that councils with the lowest number of 16-18 year olds NEET did not necessarily have the lowest number of

23. Welsh Government (August 2013) Equality Impact Assessment: Youth Engagement and Progression Framework

24. Audit Commission, *Against the Odds – Re-engaging young people in education, employment or training*, July 2010

19-24 years NEET. Similarly, figures for Welsh local authorities show that those with the biggest falls in the proportion of year 11 (aged 16) leavers who are NEET did not necessarily see the same improvement with older age group. In Torfaen, for example, the proportion of year 11 leavers who are NEET fell from 8.2 per cent in 2009 to 2.5 per cent in 2013 but the number of year 13 (aged 18) school leavers who are NEET increased from 5 to 7.0 per cent over the same period (Figures from Career Wales, April 2014).

2.21 The Audit Commission (2010) concluded that the problems and challenges of being NEET do not fit neatly into the responsibilities of agencies that only see young people up to age 18. Looking at policies in England, the Audit Commission found that policy documents tend to reflect departmental responsibilities for young people which change at the age of 18²⁵, with an overlap until 19. The Audit Commission concluded that the UK Government's focus on achieving its 16-18 NEET target in 2010 did not encourage providers to think about employment prospects from 18-24 and recommended developing a more coherent approach to supporting young people most at risk until their mid-twenties.

2.22 Achieving a more coherent approach will face different challenges in Wales. The Minister for Education and Skills²⁶ has overall responsibility for both youth engagement and progression.

However, a significant complication for Wales is that responsibility for income maintenance and associated skills and employment training lies with the UK Government's Department of Work and Pensions. As such, the Welsh Government skills training programmes must operate in conjunction with the UK Government's Work Programme²⁷ and Youth Contract²⁸. Welsh Government programmes such as Jobs Growth Wales or Pathways to Employment operate in the period before individuals are required to engage with the Department for Work and Pensions' Work Programme. This is an important constraint on work with young people aged 19 plus and for the small number of young people under 19 who are in contact with the Work Programme including those released from youth custody. The UK government has taken a different view so that Work Programme participants in England are able to access programmes funded by the European Social Fund²⁹. In November 2013, the Welsh Affairs Select Committee recommended in its report on the Work Programme in Wales that the two administrations work together to enable Work Programme participants in Wales to be able to access the full range of training opportunities available³⁰. The Welsh Government and the UK Government have established an official level-working group, chaired by the Minister for Skills, to explore this issue further. This Committee met for the first time in February 2014.

25 In England, government policy affecting young people NEET lies with the Department for Education (including schools, curriculum up to 18 and further education), the Department for Business, Innovation and Skills (including raising skills levels and reducing the proportion of 18-24-year-olds who are NEET) and the Department for Work and Pensions (support and help for unemployed 18-24-year-olds get back into work and welfare benefits).

26 Lead responsibility for youth engagement and progression and Career Wales lies within the Skills Higher Education and Lifelong Learning Group (SHELL). This group sits within the Education and Skills Directorate alongside the Schools and Young People Group with responsibility for schools and the youth service. The Deputy Minister for Skills and Technology is responsible for the Framework although the Minister for Education and Skills has overall responsibility.

27 The UK Government's Work Programme replaced several schemes including Employment Zones, the New Deal, Flexible New Deal and the Future Jobs Fund in 2011. It focuses on people who are unemployed long term or at risk of becoming so and refers them to private, voluntary and public sector organisations who are paid primarily for placing people in work and remain in work.

28 The Youth Contract is a UK Government Programme specifically focussed on young people. It was launched in April 2012 to provide opportunities for 18-24 year olds including apprenticeships and voluntary work placements and also support for businesses employing young people through Jobcentre Plus or the Work Programme who have been unemployed for six months or more.

29 The Welsh Government's Welsh European Funding Office determined that Work Programme participants would not be allowed to access courses funded by European Social Funds (ESF) as this constituted double-funding under EU rules even where the jobseeker was taking the course prior to referral onto the Work Programme. The Scottish Government has taken a similar decision. This is not the case in England, where customers are able to access Skills Funding Agency programmes part funded by ESF.

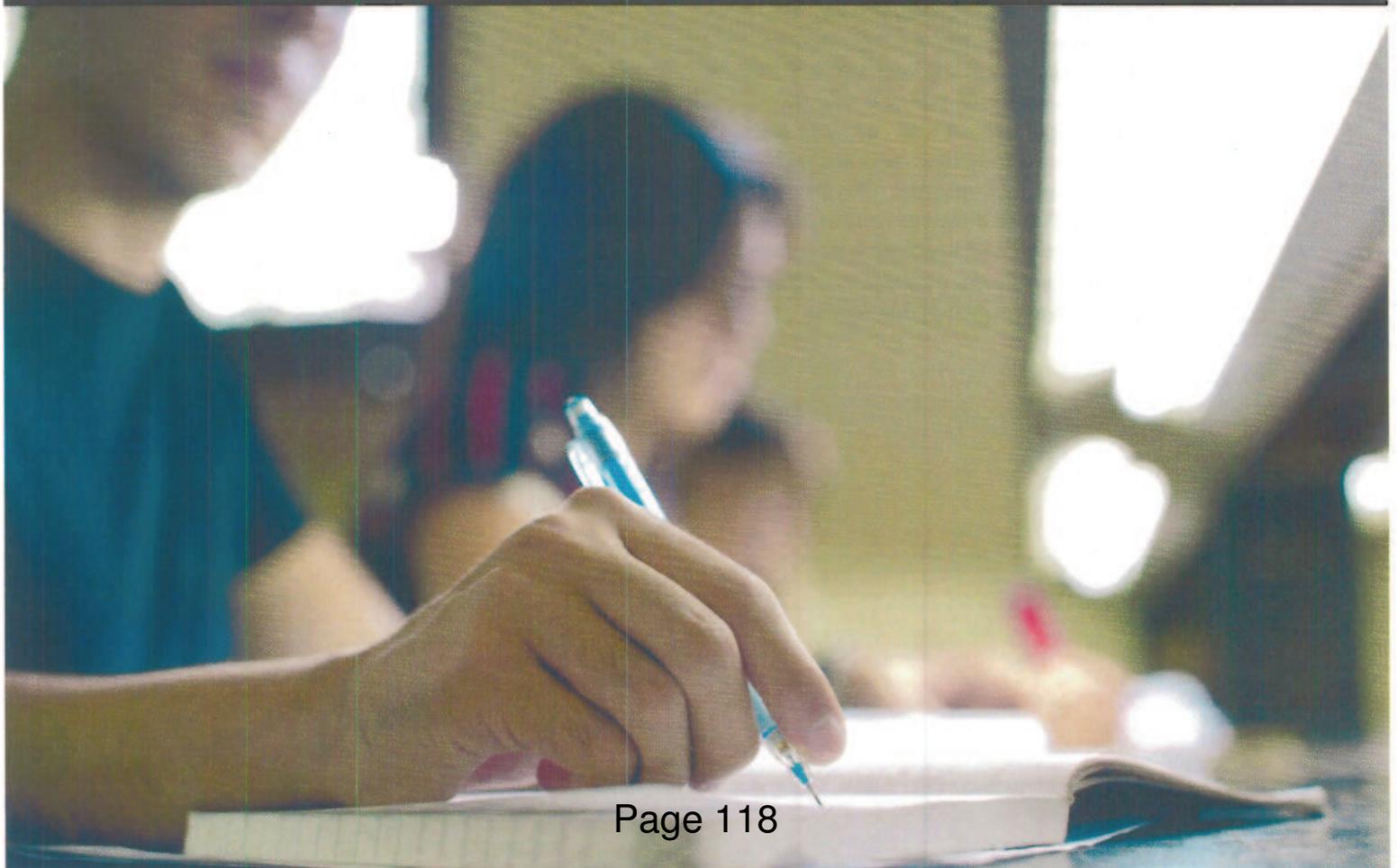
30 Welsh Affairs Select Committee – Third Report (2013) The Work Programme in Wales paras 53-63

2.23 Councils and their partners told us that the central role played by the Department for Work and Pensions for young people aged 19 and over was an important factor constraining councils' ability to lead and innovate in work with young people 19-24 who are NEET, as they have far fewer levers to influence provision for those over 19. Where councils were developing strategies for over-19s, some had recruited local Job Centre Plus staff onto their NEET management boards to better co-ordinate work. Councils mostly reported good local working relationships with the Job Centre Plus staff locally although they reported some areas of difficulty around data sharing.

2.24 Currently each local authority is developing data sharing protocols within their local partnerships. This is supported within the Framework, which cites the data sharing agreement developed in Ceredigion as a good practice model. However, this model does not include the Department for Work and Pensions because they do not participate in the local arrangements in Ceredigion because of data concerns. However, in other areas we found that councils and the Department for Work and Pensions were piloting measures to enable data sharing where individuals gave their consent. The Department for Work and Pensions is currently exploring the legal and practical barriers to sharing information on individuals with local partners to enable greater consistency in approach across Wales.

Part 3

The Welsh Government has clear mechanisms to monitor progress and hold councils and most national stakeholders to account but councils have not adopted its targets despite being committed to reducing the numbers of young people who are NEET



The Welsh Government has set out responsibilities for implementing the Framework clearly and introduced a mechanism for holding councils and some other partners to account, although some arrangements for local accountability are unclear and arrangements will be affected by any changes in the delivery of education services

The Welsh Government has set out responsibilities for implementing the Framework clearly although plans to hold councils and other partners to account for performance depend heavily on developing sustained destination measures

The Welsh Government has clearly set out responsibilities for implementing its Framework for most of its partners

3.1 The Welsh Government has clearly set out the roles and responsibilities for implementing the Framework for most of its partners (Box 5). It sees its own role as setting out clear standards and expectations of improvement, helping local authorities develop and implement plans and hold councils and partners to account. The Welsh Government is introducing new mechanisms

to hold councils and partners better to account for performance in reducing the number of young people who are NEET. From January 2014, officials from Welsh Government's Youth Engagement and Employment Division meet bi-annually with a senior leader in each Council to discuss the Council's NEET Action Plan and progress towards achieving targets. This approach draws on the findings of research³¹ and inspection³², which emphasises the importance of strong, senior leadership to achieving progress in reducing the number of young people who are NEET.

3.2 At age 18, young people who are NEET become eligible to claim benefits and responsibility for support for them moves from Career Wales to Job Centre Plus. There are also a small number of 16-17 year olds who are eligible for benefits, mainly on grounds of hardship. In recent years, joint working between Job Centre Plus advisors and Career Wales advisors has developed in some local authorities to provide more seamless services for unemployed young people as they become eligible for benefits. While Careers Wales has some presence in all Job Centre Plus offices, some areas have particularly strong working arrangements. Work is on-going to develop procedures so that this joint working occurs more consistently across Wales. The Framework could helpfully reflect this work.

31 Azad (2011).

32 Ofsted (2010), Audit Commission (2010).

Box 5 – The Welsh Government’s Framework clearly sets out roles and responsibilities of major partners other than the Department for Work and Pensions for reducing the numbers of young people NEET

The Youth Engagement and Progression Framework clearly sets out the roles and responsibilities of partners in action to reduce the number of young people who are NEET:

- **Welsh Government’s** role in implementing the Framework is to set out clear standards and expectations, to help local authorities to develop their plans and support their implementation by helping them to learn from effective practice across Wales, whilst holding local authorities and providers to account for the outcomes achieved.
- **Local Authorities** have the lead strategic responsibility for implementation of the framework. They may want to allocate responsibility for implementation of the Framework to a senior leader within the local authority. In addition, they may want to develop the role of an Engagement and Progression Co-ordinator to provide operational leadership, and to work closely with Careers Wales and providers.
- **Careers Wales** can help to bring greater consistency to implementation of the Framework across Wales and has an important role in supporting the development of new brokerage arrangements and in implementing the data and tracking systems.
- **The Youth Service** will have a vital role as provider of lead workers for those young people identified in greatest need of support. These proposed responsibilities are set out in the National Youth Service Strategy Consultation document.
- **Schools** are responsible for ensuring the right young people have been identified and tracking the progress made by young people. They will support young people to use the common application process and ensure access to appropriate information, advice and guidance. We will hold schools to account by developing post-16 Destination Measures.
- **Post-16 providers** are responsible for identifying young people at risk of dropping out and providing support to help keep them engaged. They will need to notify Careers Wales if young people drop out of education and training. They are also critical to ensuring an appropriate mix and balance of provision is in place in every area.

Source: Welsh Government Youth Engagement and Progression Framework (2013)

The Welsh Government and Career Wales are working to improve measures of sustained destinations, without which it will be difficult to hold each organisation to account for its performance

3.3 Successive reviews and reports have recognised the lack of sustained data on the destinations of learners as a weakness in evaluating the effectiveness of interventions with 14-19 year olds:

- a The report of the National Assembly's Enterprise and Learning Committee (2010)³³ on young people who are NEET made several recommendations about the quality and use of data to support performance monitoring. For example, its first recommendation was that the Welsh Government continues to ensure, by working with the UK Government where appropriate, that headline and local data relating to young people NEET are as comprehensive, robust and up-to-date as possible.
- b *The 2012 Review of Qualifications for 14-19 year olds in Wales*³⁴ recommended that performance criteria support a unified national qualifications system for Wales, with data collected on a consistent basis across the school sixth form, further education and work-based learning sectors, on the basis of retention, completion, attainment and progression.

c *The Review of the Future Delivery of Education Services in Wales* (June 2013)³⁵ recognised that post-16 outcome measures are not aligned. In our visits to councils, some officials commented that Estyn's use of post-16 destination measures was instrumental in schools increasing interest and commitment to improving post-16 destinations and reducing the number of learners who do not make successful transitions at 16.

3.4 The Welsh Government envisages that comparable performance data for 16, 17 and 18 year olds by local authority area will be its main tool for holding councils, schools and other providers to account for performance. However, its ability to do this heavily depends on developing better destination measures than are currently available. The Welsh Government's Statistical First Release (published annually in July) provides the most complete picture of the number of young people NEET. This data does not provide any more detailed analysis other than by gender. Further information (for example, disability and ethnic group) is available from the Annual Population Survey but the sample size is too small to be analysed at local authority level.

3.5 Currently, the only data routinely published which compares outcomes for the whole year group by local authority is collected by Careers Wales on destinations at 16. Careers Wales' data on 17 and 18 year olds up to and including 2013 includes only those attending school sixth forms. Careers Wales is undertaking work to publish the first destination dataset for all 16-18 year olds.

33 National Assembly for Wales Enterprise and Learning Committee (2010) *Young people not in education, employment or training*, Recommendations 1, 2 and 3. <http://www.assemblywales.org>

34 Welsh Government (2012), *A review of qualifications for 14-19 year olds in Wales* (November 2012) Recommendation 40

35 Welsh Government, *The future delivery of education services in Wales* (June 2013), page 11

3.6 These new figures will report leavers' destinations known in October each year ie, shortly after leaving school or further education. Similar data for England reports more sustained destinations by reporting on destinations sustained between October and March the following year for year 11 leavers. These experimental statistics are published in the performance data for all secondary schools in England. The Welsh Government has established a cross cutting Departmental steering group to develop a strategic approach to destination measures which will link data sets across different education sectors and look to produced destination measures that report longer term outcomes for school leavers.

3.7 Careers Wales also plans to make data available in-year from its national database about the position of all 16-18 year olds against its 'five tier model of engagement'. The Welsh Government can use this more detailed information in conversations with local authorities about their progress and by local authorities themselves to plan provision.

3.8 Generally, the data available reports destinations at a point in time rather than tracking a cohort of young people. Young people are very mobile at this stage in their lives. For example, statistics demonstrate that four per cent of those starting a further education course (and up to nine per cent in some colleges) leave within eight weeks. The Welsh Government's Framework puts requirements on work-based learning

providers and further education colleges to share destination information so that Careers Wales can better track individuals and offer guidance and advice more quickly if an individual drops out. This will be done by strengthening expectations that providers will give Careers Wales this data regularly in the annual letter in which the Welsh Government sets out its priorities for the further education sector, in work-based learning funding contracts, and by working with Colegau Cymru³⁶ to encourage regular notifications of changes in destinations.

3.9 The increased use of the Unique Learner Number (ULN) by schools for learners from year 9 (age 14) is also important to enabling more effective tracking of individuals, provided that the individual consents to sharing their data. The 2012 Review of 14-19 Qualifications³⁷ recommended that Awarding Bodies and learning providers in all sectors should be required to adopt management information systems that capture ULN data in a nationally agreed format. Although the Welsh Government has not mandated maintained schools in Wales³⁸ to use the ULN, there are clear incentives to do so as the ULN substantially reduces the administration required for examinations and admissions and is required by some awarding bodies. Currently around 95 per cent of learners have a ULN but some of the young people most at risk of becoming NEET – those in special schools in Wales and young offender institutions - do not currently register for a ULN which will subsequently reduce the ability to trace their progress.

³⁶ Colegau Cymru / Colleges Wales is the national organisation representing all 16 further education colleges and institutions in Wales.

³⁷ Welsh Government (2012) *Review of qualifications for 14-19 year olds in Wales: Final report and recommendations*

³⁸ Maintained schools and academies in England will be required to use ULN for learners from year 9 onwards from January 2014. This requirement includes learners in PRUs and alternative provision and will form the basis of the annual school census. It is estimated that the introduction of the ULN in England has achieved £18 million in efficiency savings in 2008-09. <http://www.learningrecordsservice.org.uk>

- 3.10 Currently, Careers Wales do not know the destinations of 1.6 per cent of 16 year olds because they do not respond or have left the area. This is an improvement on 2009 when 3.4 per cent did not respond to the survey or had left the area and destinations were unknown. The Welsh Government's Framework challenges Careers Wales and councils to develop more effective mechanisms for tracing young people whose destination is currently unknown because it is possible that a proportion of this group are not engaged in education, employment or training.

Councils were generally able to hold their officials to account but processes for holding partners to account were sometimes unclear

- 3.11 We found that councils generally had clear processes to hold officials to account but the lack of targets and performance measures in some councils for the proportion of young people who are NEET reduces their ability to use their accountability processes effectively.
- 3.12 In Cardiff, for example, the Council has set no overall target for reducing the numbers of young people who are NEET to measure progress towards its stated desire to be a city where all young people are engaged in education, employment or training. We found that although officials and partners were committed to achieving the Council's vision, we observed that accountability and performance management were stronger in some departments than in others. However, within the Council, Families First and Communities First have developed scorecards to measure progress and there are a range of performance measures used to monitor the progress of learning coaches, training and

enterprise centres and the Careers Wales team. Similarly, in Rhondda Cynon Taf, the Supporting Engagement in Education, Employment and Training Strategy 2012-2015, Single Integrated Plan and Corporate Plan lack clear targets.

- 3.13 Councils told us that they found it difficult to challenge the performance of some of their partners, particularly where they are not funders. Apart from lacking clear targets and performance measures, some councils did not have performance information from local work based learning providers or from some third sector organisations. The Framework acknowledges some of these difficulties by encouraging council officials to raise any concerns about national providers' performance in their biannual meetings with the Welsh Government.

In future, the structure for holding councils to account will need to reflect changes in the arrangements for delivering education services

- 3.14 The Welsh Government's approach to holding councils to account for their performance in reducing the proportion of young people who are NEET may need to alter to reflect the changing shape of education services in Wales following the establishment in 2011 of regional consortia focused on school improvement and the 2013 Review of the Future Delivery of Education Services in Wales. The development of the National Model for Regional Working seeks to clarify the roles that schools, councils, regional consortia and the Welsh Government play in improving outcomes for children and young people. In this model, consortia are expected to have oversight 'strategic overview' of the regional 14-19 offer.

3.15 In time, the national model has the potential to create the structures and framework within which this partnership can function. In the model, although local authorities retain the statutory responsibility for schools and school improvement, regional consortia will support schools and local authorities to improve learner outcomes. It is unclear if this will include reducing the number who are NEET on leaving school or achieve low qualifications. The regional consortia are, in time, likely to play an increased role in the provision of support for additional learning needs as the Welsh Government has recognised that schools are often unable to support the full range of specialist services required for these diverse needs.

3.16 The Welsh Government will also need to take account of the potential reform in the structure of local government following the Commission on Public Service Delivery (the Williams Commission) that reported in January 2014. This recommended a reduction in the number of authorities in Wales. The final shape of councils and the timetable for change are yet to be decided but change will affect the delivery education and youth services across Wales.

The Welsh Government has taken steps to make its own departments' accountability for implementing the Framework clearer and to co-ordinate the activities of policy departments

3.17 In our fieldwork, councils told us that some of the initiatives coming from the Welsh Government seemed uncoordinated. For example, at the same time as piloting the Framework, councils were also developing services aimed at reducing the number of young people who are NEET in response to initiatives from Communities First and Families First. Work funded through Communities First or Families First is subject to different performance management arrangements and targets with which local authorities have to comply.

3.18 The Welsh Government has created a Youth Engagement and Progression Framework Programme Board which met for the first time in July 2013. The Board brings together representatives from relevant policy areas to better ensure co-ordination across Welsh Government divisions and branches in the delivery of the implementation plan for Youth Engagement and Progression. Divisions represented include Further Education and Apprenticeships Division, Support for Learners Division and the Strategy and Workforce Unit in Department for Education and Skills as well as the Deputy Director for Employment and Skills. There are also representatives of other parts of the Welsh Government that contribute to the delivery of the strategic outcomes and benefits of the Framework such as Statistics, Welsh Language, Communities First and Entrepreneurship and Delivery. The Programme Board will approve all major plans, key documents

and major deviations from the Programme and reports to the Department for Education and Skills Delivery Board chaired by the Director General, Education and Skills.

The Welsh Government has set national targets to reduce the number of 16-18, 19-24 year olds and care leavers who are NEET but councils do not share them despite their own commitment to the agenda

3.19 The Welsh Government has set three targets for reducing the number of young people who are NEET (Box 6). These targets are contained in the latest actions plans for implementing its Tackling Poverty Strategy. Progress towards these targets is currently inconsistently reported. For example the Programme for Government reports the proportion of young people 16-18 years old who are NEET and compares this against that in England. It also reports the proportion of 19-24 year olds who are NEET without making comparison to performance elsewhere in the UK. Comparable data for Scotland and Northern Ireland for 16-18 year olds and 19-24 year olds is only available from the Annual Population Survey and is published in an annual statistics publication.

Box 6 – The Welsh Government has set three targets within its Tackling Poverty Strategy that are associated with reducing the number of young people who are NEET

The Youth Engagement and Progression Framework clearly sets out the roles and responsibilities of partners in action to reduce the number of young people who are NEET:

- reduce the percentage of young people 16-18 who are NEET to nine per cent by 2017 (from 12.1 per cent at the end of 2011);
- reduce the proportion of young people who are NEET aged 19-24 in Wales relative to the UK as a whole by 2017; and
- increase the percentage of care leavers in education, training or employment to 51 per cent by 2017. (from 47 per cent in 2011/12).

Source: Welsh Government's Programme for Government (2013) Building resilient communities: taking forward the Tackling Poverty Action Plan (pages 17-13)

3.20 In visits, we found that councillors and officials were clearly committed to the aim of reducing the number of young people who are NEET. Although all councils made some reference to reducing the number of young people who are NEET in their improvement objectives or other strategic documents, the majority have not set any measurable targets. Where they have done so, measures and targets did not reflect those of the Welsh Government and were inconsistent. For example, councils' plans focused on:

- a young people aged 18 or over (Swansea and Wrexham);
- b 14-19 year olds (Carmarthenshire and Vale of Glamorgan);
- c 16-18 year olds (Rhondda Cynon Taf and Torfaen); and
- d 16-24 year olds (Caerphilly, Cardiff, Conwy and Flintshire).

3.21 Achieving the targets for care leavers will be challenging, especially as the proportion in education, employment and training fell in 2011 compared to the previous year. The progress is reported in the Programme for Government annual reports which show that the performance is significantly worse than in England. However, in Wales, the proportion of care leavers in education, employment and training has increased over five years from 44.8 per cent in 2008 to 52.4 per cent in 2012 whereas the proportion in England has declined from 63 per cent to 58 per cent in the same period. We found that only a minority of councils had developed explicit targets relating to the proportion of care leavers in education, employment and training.

Part 4

The Welsh Government has not developed sufficiently clear plans to deliver its commitments to effective evaluation and shared learning and to assess value for money of the substantial public expenditure in this area

The Welsh Government has outlined the social benefits flowing from reducing the number of young people who are NEET but needs to do more work to measure these benefits

- 4.1 We found that councillors and local government officials had a clear understanding of the types of social benefits that could flow from reducing the number of young people who are NEET. In meetings with us, they described links between poorer health outcomes, crime and antisocial behaviour when young people become NEET. However, these social benefits were rarely reflected in the councils' outcomes and targets.
- 4.2 The Welsh Government's Framework also discusses how reducing the number of young people who are NEET is likely to result in reducing the social costs of long term unemployment including the long-term costs of antisocial behaviour and health and social services costs. The Welsh Government produced a plan setting out the potential benefits of the Framework in October 2013. The plan refers to benefits including increased attainment and increased income but recognises that this is dependent to some extent on labour market conditions. It also suggests that reducing the numbers of young people who are NEET will have a positive impact on costs associated with health, police and social services and long-term unemployment.
- 4.3 However none of the targets outlined in the plan reflect these benefits and it is not clear if, and how, the Welsh Government intends to capture these social impacts to demonstrate the effectiveness or not of the Framework. Similarly, it is not clear how it will measure and quantify any link between reducing the numbers of young people NEET and increasing incomes levels and reducing poverty.

The Welsh Government is committed to evaluation and enabling shared learning

- 4.4 From our visits to councils in Wales, we concluded that, although outcomes for young people have improved, a lack of routine evaluation meant that the contribution of individual interventions is often unclear. Generally, the lack of a common approach to evaluating the large number of projects and programmes provided by organisations working with young people in their areas means it is difficult for councils to assess effectiveness and value for money of the services provided to reduce disengagement. There were some examples of councils that had assessed the relative effectiveness of services or specific projects. However because evaluation is not generally undertaken routinely, councils lack a clear picture of 'what works' in their area to inform service planning and delivery and are not able to judge the value for money of interventions. Some councils told us that they are planning steps to address this gap.
- 4.5 Similarly, we found that the Welsh Government has evaluated some aspects of the programmes and services that aim to reduce the number of young people NEET. For example, because European funding is contingent upon there being some form of evaluation, there is a substantial raft of information about the throughput and outcomes of European funded work. Work is currently ongoing within the Welsh Government to build in requirements and standards for evaluation into the second wave of EU funded projects from 2014 to embed a more consistent and comparable approach to evaluation. However the same requirements do not apply to projects receiving other funding, although project managers are usually required to provide information on throughput and sometimes outcomes to the relevant funder.

4.6 The Welsh Government also reviewed the operation of education maintenance allowance in 2008 and plans a full evaluation starting in 2014. An evaluation of the Welsh Government's Financial Contingency Fund was completed in 2013. However, despite this monitoring and evaluation activity, there is no overall assessment of effectiveness of work to reduce the number of young people NEET. The different measures of outputs and/or outcomes required by grant holders means that it would currently be difficult to compare the relative effectiveness of the range of interventions undertaken to better understand their relative contribution to improving outcomes for young people.

4.7 The Welsh Government has committed to evaluating the Framework to understand its effectiveness both at a national and local level. Currently, a two-phased evaluation is planned that will initially examine the process of implementing the Framework, particularly focussing on the implementation of its two new offers, the single lead worker and the Youth Guarantee. The second phase will evaluate the effectiveness of the Framework and local authority work in reducing the number of young people who are NEET. There are a significant number of challenges for any independent evaluation:

a *Co-ordinating on-going evaluations to ensure common outcome measures to enable comparison.* For example, there is a requirement to evaluate all projects funded by the European Social Fund but currently the outcomes are not collected in the same format as projects supported by

other funders. This limits any comparison of effectiveness between interventions. The Welsh Government has also committed to evaluating the range, value and impact of youth work provision including its contribution to employability by 2017 and the impact of youth work in schools by the end of 2015 and it will be important that outcomes are comparable with other evaluation work.

b *Ensuring high quality evaluation of interventions.* Good quality evaluation can provide evidence on causality and attribution – that is whether a policy achieved its intended outcomes and the extent to which observed change was due to the policy rather than other factors. The National Audit Office (2013) reported that, across Whitehall, evaluation was not comprehensive and generally resulted in low quality of evaluation evidence: only a minority of studies could give reliable evidence about the effectiveness of policies³⁹. Looking at the evidence in Wales, currently few studies have provided high quality evidence of effectiveness. Few studies have followed a quasi-experimental design, for example by including a matched comparison group to better understand causality. We are not aware of any evaluations in Wales of NEET related activity that have undertaken any form of randomised control, which would measure the effectiveness of an intervention and take into account the multiple organisations and public services that are often working simultaneously with young people who are NEET or at risk of becoming so.

- c *Allowing for the long-term impact of work to reduce the number of young people disengaged from education, employment or training.* Currently most measures are collected shortly after the intervention is completed. For example, destinations from further education currently are based on information collected from the respondent at the end of the course and represent their intentions at that time. Better tracking of individuals through education and subsequently would enable better measures of the long term impact of interventions.
- d *Capturing the social and economic benefits flowing from reducing the number of young people NEET.* Currently young people are completing education or training in a period of historically high youth unemployment. Therefore, any attempt to evaluate the impact of interventions will need to also report social and economic benefits that flow from work to provide a full assessment of impact.
- e *Evaluating the value for money of interventions and the general approach.* This requires a thorough assessment of the costs of services as well as comprehensive assessment of outcomes.

4.8 The Framework demonstrates a commitment to sharing learning and sharing good practice through workshops, 'deep dive' sessions, linking authorities and identifying good practice. However, it is not clear whether there will be sufficient resources for the heavy demands involved in sharing good practice and learning effectively.

The Welsh Government and councils need to do more to assess the value for money from the substantial level of public expenditure on young people who are NEET

4.9 Research, commissioned by the Audit Commission in 2010⁴⁰, estimated the average cost of being NEET as £56,400 in public finance costs and £104,000 in resource costs (Box 7). The Welsh Government's Framework makes some reference these figures. We found that many councils also refer to the figures in a range of strategic documents. Applying these figures to Wales would suggest that the lifetime cost of the current numbers of young people 16-18 who are NEET is £626 million in public finance costs and £1.21 billion in resource costs⁴¹. Not all of these costs fall to councils or the Welsh Government directly as a substantial proportion of the potential lifetime cost is made up of welfare benefits and lost tax and national insurance to the Treasury. Neither the Welsh Government nor councils have calculated the cost to themselves of a high NEET population.

⁴⁰ Bob Coles, Christine Godfrey, Antonia Keung, Steven Parrott and Jonathan Bradshaw (2010) *Estimating the life-time cost of NEET: 16-18 year olds not in Education, Employment or Training Research Undertaken for the Audit Commission*

⁴¹ These figures differ from those quoted in the Welsh Government's Framework which erroneously adds together the public finance costs and the resource costs in calculating the cost of the current cohort of young people 16-18 who are NEET. The original research states that these costs should be considered separately because of the potential overlap between the calculations.

Box 7 – Research has demonstrated the high cost of young people being NEET for a sustained period

Research commissioned by the Audit Commission in 2010 estimated the long-term cost of rising levels of NEET using a review of statistical sources and literature on young people who are NEET. The research estimated the average lifetime cost of individual young people being NEET:

- **Public finance costs** before retirement age based on the payment of welfare benefits, costs to health and criminal justice services and lost tax and national insurance contributions. The research estimates the average individual lifetime cost at £56,000.
- **Resource costs** which represent the loss to the economy and to individuals and their families resulting from their being NEET and subsequent under-employment and unemployment. The average lifetime resource cost is estimated at £104,000.

The research concluded that the entire 2008 group of young people NEET in England could cost over £12 billion in public finance costs and £22 billion in resource costs. The authors encourage caution in using average costs because of the huge variations in subsequent experience of young people who are NEET for a period between the ages of 16-24. The case study which saw the greatest cost to public finance was that of a young offender where costs of more than £2 million was projected over the individual's lifetime. Conversely, those on a planned break from education (e.g. 'gap year' students), incur relatively little cost to the public purse. Some of the case studies were used to illustrate how relatively inexpensive youth support projects can result in major public finance savings.

Source: Audit Commission, 2010 Against the odds: re-engaging young people in education, employment or training

4.10 In 2010, the Welsh Government's Task Force on Youth Engagement and Employment noted the large amount of public expenditure in this policy area and recommended that the Welsh Government reviews the total youth spend in order to be able to better assess value for money. The Welsh Government has not completed this recommendation. Therefore it does not know if the estimated £200 million annual current expenditure associated with reducing the number of young people NEET (Tables 1 and 2) is being spent in the most effective way, whether current levels of expenditure are sufficient or if it could achieve its desired outcomes with less expenditure. As financial challenges continue, it will be necessary to develop a better understanding of the costs of interventions and their benefits to be able to judge their relative effectiveness.

4.11 Similarly, we found that the economic costs of young people being NEET for a sustained period were referenced in a range of council assessments, mapping exercises and sometimes in Single Integrated Plans. Consideration of the economic consequences of a high NEET population influenced the development of projects including the Caerphilly Council Passport Scheme, initiatives with local businesses to address skills gaps in Cardiff and the development of social impact clauses in procurement contracts in Cardiff, Rhondda Cynon Taf and Swansea. However, these references tended to be to a general global cost of being NEET. Councils had not calculated the cost of young people being NEET to them directly or to their partners nor calculated the totality of their spending on young people who are NEET or at risk of becoming so.

- 4.12 Some councils have set out the costs of administering some initiatives, particularly 14-19 provision, but we found that none had made a thorough assessment of the resources required to achieve improved outcomes for young people who are NEET or at risk of becoming so. Documents generally lacked detail on the resources required to meet strategic priorities and failed to consider the cost to the council of implementing the Welsh Government's Framework. Although Flintshire Council had identified the resources required to achieve their ambitions, this was expressed in fairly general terms, describing the staff time and training and making some reference to funding. In Cardiff, the council has identified the cost of the brokerage element of its Youth Engagement, Transition and Progression strategy, although it is more difficult to estimate the other resources required as that is dependent on the needs of the young people identified as requiring support.
- 4.13 This lack of financial analysis is likely to limit councils' ability to balance NEET services with other non-statutory priorities in the face of financial challenges. It may also mean that local government is unable to discuss the financial planning for reducing the number of young people NEET with the Welsh Government from a clear understanding of the costs and benefits of the proposed services and arrangements.

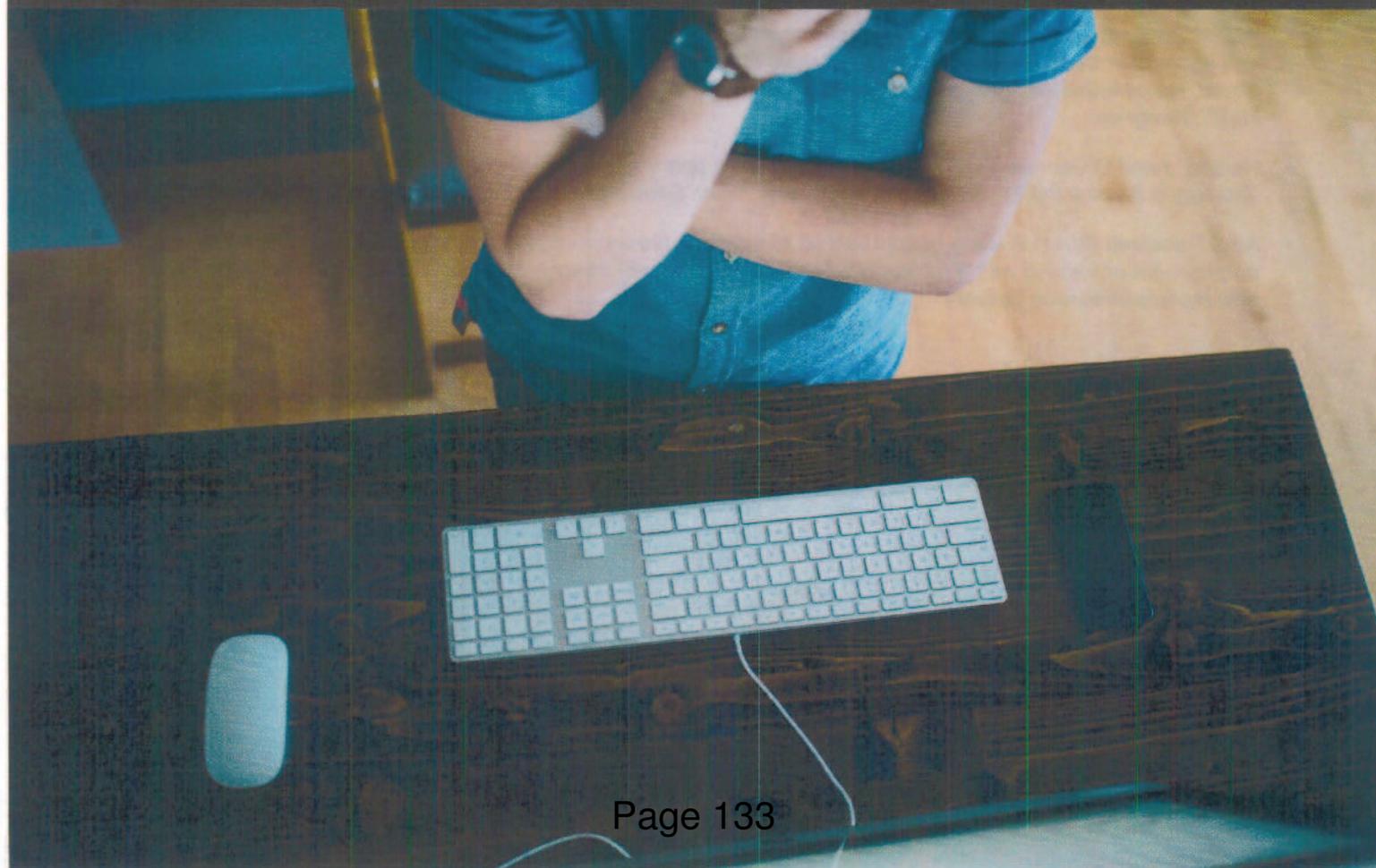
Appendices

Appendix 1 - Methodology

Appendix 2 - Young people not in education, employment or training

Appendix 3 - Summary of findings from fieldwork in councils

Appendix 4 - Comparison of policies to reduce the number of young people who are NEET in the UK



Appendix 1

Methodology

In undertaking the investigation, the Wales Audit Office team gathered evidence from a variety of sources between May 2013 and March 2014.

Literature review

We reviewed a number of other reports on reducing the number of young people who are NEET as well as Welsh government documents and supporting papers. Reports that are particularly influential were:

- National Assembly for Wales Enterprise and Learning Committee (2010) *Young people not in education, employment or training*
- National Assembly for Wales (2013) *Young people not in education, employment or training*, National Assembly Wales Research Paper, September 2013
- Audit Commission (2010) *Against the odds: re-engaging young people in education, employment or training* <http://archive.audit-commission.gov.uk/auditcommission/sitecollectiondocuments/Downloads/20100707-againsttheoddsfull.pdf>
- Ofsted (2010) *Reducing the numbers of young people not in education, employment or training: what works and why* <http://www.ofsted.gov.uk/resources/reducing-numbers-of-young-people-not-education-employment-or-training-what-works-and-why>
- Welsh Government (2010) *A qualitative research study to explore young people's disengagement from learning* Social research 04/2010 <http://wales.gov.uk/docs/dcells/publications/100715disengagementreporten.pdf>
- Welsh Government (2011) *A study of approaches to increase the proportion of young people in education, employment or training with a focus on potential or actual efficiency savings*, Efficiency and Innovation Board, New Models of Service Delivery <http://wales.gov.uk/topics/improving-services/pslg/nwp/effectservices/NEET/?lang=en>
- Nelson, J and O'Donnell, L. (2012). *Approaches to Supporting Young People Not in Education, Employment or Training: a Review* (NFER Research Programme: From Education to Employment) Slough, NFER
- Arad Research (2011) *A study of approaches to increase the proportion of young people in education, employment or training with a focus on potential and actual efficiency savings* Efficiency and Innovation Board: new models of service delivery

Official statistics and other data analysis

We have used a number of data sources in the review:

- The Welsh Government provided statistics on young people who are NEET that underlie its annual publication 'Young people not in education, employment or training'. We were therefore able to provide more detailed analysis than the published figures. This analysis forms the basis of Appendix 2.
- We also examined Welsh Government expenditure data for 2012-13 to identify expenditure on areas related to work to reduce young people who are NEET. This expenditure is generally focused on young people rather than specifically on who are NEET. We were not able to identify specific expenditure on young people who are NEET in most areas.
- We reviewed Welsh Government strategic documents dating back to 2000 about reducing the number of young people who are NEET and also papers relating to the development of the Framework.
- We invited comments from a range of organisations that work with young people who are NEET or at risk of disengaging on the Welsh Government's Framework and also on their experience of barriers to effective working.

Visits to councils

Team members visited eight councils across Wales⁴²:

- Caerphilly
- Cardiff
- Carmarthenshire
- Conwy
- Flintshire
- Rhonda Cynon Taf
- Torfaen
- Vale of Glamorgan

⁴² Ceredigion council requested that we review their work with young people who are NEET as part of our programme of assessment work. This took place in October and November 2013 and we refer to some findings in this report.

During these visits we spoke to councillors and senior officials teachers responsible for setting the councils strategic approach to reducing young people who are NEET. We also spoke to other staff responsible for working with young people directly, both those employed by the councils and other service providers.

We also spoke to partners in the local areas including Careers Wales, Department for Work and Pensions, schools and further education college staff and work-based learning providers, to obtain a full picture of services in the area. We spoke to staff from some third-sector projects where these operated in the areas.

We also visited Swansea and Wrexham councils which had been the subject of research in 2011 which identified factors associated with successful implementation. We examined the extent to which the Councils' work with young people who are NEET or at risk of becoming NEET has developed since 2011.

Other interviews and work

The team has spoken to officials from the Welsh Government with responsibility for youth engagement and other areas of policy including support for learners, work based learning, student finance and the review of qualifications. The team met officials from Careers Wales.

We invited information and comments from third sector organisations with a record of working with disadvantaged and disengaged young people in Wales as well as from the Children's Commissioner for Wales.

We attended two of the Welsh Government's 'Real Conversation' events with employers, learning providers and young people.

We established a reference group for the study. This group informed our methodology, offered suggestions and commented on findings. The reference group comprised:

- Prof. Howard Williamson, University of South Wales
- Richard Parry, former Director of Education, the City and Council of Swansea
- Michael Trickey, Joseph Rowntree Foundation adviser for Wales
- Katy Young, Care and Social Services Inspectorate for Wales
- Jane Taylor and Ged Kerlake, Her Majesty's Inspectorate for Education and Training in Wales, Estyn

Appendix 2

Young people not in education, employment or training

The Welsh Government's principal measure of young people who are NEET is reported annually in the Statistical First Release, *Participation of young people in education and the labour market*. This appendix highlights the main findings of that report and information from other sources and research.

In addition the annual measure of young people NEET in Wales, we refer to data from two other key sources:

- The Annual population survey – the survey provides an estimate of the proportion of young people who are NEET. These estimates are updated on a quarterly basis to provide a more timely, if less statistically robust, measure of the proportion NEET than the annual Statistical First Release. The survey contains more detailed information on the characteristics of young people including gender and disability but, because of small numbers, these figures are published as averages over a three-year period.
- Career Wales' data on the destinations of young people – Career Wales collects data on the destinations of all year 11 leavers in October (ie after three months). Data is available on those leaving maintained schools, but not FE institutions, for Year 12 and 13.

Counting the number of young people who are NEET

There is no universal definition of 'NEET'. Generally, the term refers to young people who are not participating in education, employment or training. For statistical purposes, training encompasses any training activity other than a leisure activity and employment includes any paid work. However, both Career Wales' and Jobs Growth Wales use working definitions of NEET that includes individuals attending education or training for less than 16 hours a week.

The UK Government first used the term 'NEET' in the mid-1990s in relation to 16-18 year olds. At that time 19-24 year olds were classed as unemployed. However the term is now used more widely to include 18-24 year olds. In some European countries, especially those such as Italy where young people commonly finish higher education after age 24, the NEET category can include people up to 29 years.

Trends in the proportion of young people who are NEET

The number of young people NEET aged 16-18 peaked in 2008 and 2009 at 12.4 per cent of the age group. However, survey data shows that only a small proportion of young people (five per cent) are NEET at age 16 but this proportion rapidly increases so that, by age 18, a fifth of young people are NEET. Moreover, while the proportion of 16 year olds NEET has fallen in recent years, the proportion of 17 year olds who are NEET is little changed and the proportion of 18 year olds who are NEET has increased (Table 3).

Table 3 – Few 16 year olds are NEET but the proportion NEET increases up to age 21 and remains high

Age	Percentage NEET 2009(Q4)-2011(Q4)	Percentage NEET 2011(Q4)-2013(Q4)	% change
16	6.6	4.7	-29
17	11.8	11.3	-4
18	18.3	21.0	14
19	19.2	18.0	-6
20	21.8	22.5	3
21	24.2	22.7	-6
22	25.4	23.3	-8
23	20.6	22.9	11
24	20.9	21.5	3

Source: Data from the Annual Population Survey, Welsh Government, Young people not in education, employment or training (Year to 31 December 2013) Statistical Bulletin 40/2014.

Among 16-18 year olds, men are more likely to be NEET than women: in 2012 (provisional) 12 per cent of young men were NEET compared to eight per cent of young women. The pattern is reversed among 19-24 year olds: in 2012 (provisional) 24 per cent of women were NEET compared to 21 per cent of men. Between 2004 and 2012, the proportion of both young men and women 16-18 year who are NEET has fallen. The picture is different for 19-24 year olds: between 2004 and 2012, the proportion of men NEET almost doubled from 11.9 per cent to 21.5 per cent. The proportion of young women also increased but by much less, rising from 20.5 per cent in 2004 to 24.5 per cent in 2012. It is likely that the proportion of young women NEET is less affected by labour market changes than young men because a greater proportion of women are not available for work because of caring or family responsibilities.

Young people with disabilities are more likely to be NEET than other young people; especially 19-24 year olds⁴³. Figures from the Annual Population Survey for 2011-2013 show that 20 per cent of 16-18 year olds with a disability were NEET compared to 11 per cent of other young people. Among 19-24 year olds almost half (46 per cent) of young people with a disability were NEET compared to 19 per cent of other young people.

The proportion of year 11 leavers known to NEET varies between councils across Wales from 1.3 per cent to 4.9 per cent (**Table 4**). All but one council have seen a fall in the number of year 11 leavers known to be NEET. In some areas, these falls have been significant: in Merthyr Tydfil, Bridgend and Torfaen for example the proportion of 16-18 year olds who are NEET more than halved between 2009 and 2013.

43: The Annual Population Survey provides data on the number of young people NEET by single year of age and disability status. However, due to the relatively small survey sample size for the 16 to 24 age group, the figures are based on three-year averages.

Table 4 – The proportion of Year 11 leavers from schools in Wales known to be NEET varies across councils in Wales and has fallen in all councils but one from 2009 to 2013

Council	Percentage Year 11 leavers known to be NEET		
	2009	2013	% change
Torfaen	8.2	2.5	-70%
Merthyr Tydfil	4.6	1.9	-59%
Bridgend	7.6	3.7	-51%
Newport	9.1	4.9	-46%
Cardiff	8.9	4.9	-45%
Monmouthshire	5	2.8	-44%
Gwynedd	4.2	2.4	-43%
Ceredigion	2.3	1.3	-43%
Swansea	6.4	3.9	-39%
Neath Port Talbot	7.1	4.4	-38%
Wrexham	5.0	3.2	-36%
Vale of Glamorgan	5.6	3.8	-32%
Blaenau Gwent	6.6	4.6	-30%
Isle of Anglesey	5.2	3.7	-29%
Pembrokeshire	4.8	3.4	-29%
Conwy	4.8	3.6	-25%
Carmarthenshire	4.0	3.0	-25%
Rhondda Cynon Taff	4.9	4.1	-16%
Caerphilly	5.0	4.4	-12%
Denbighshire	4.4	4.1	-7%
Flintshire	3.7	3.6	-3%
Powys	2.1	2.7	29%
Wales	5.7	3.7	-35%

Source: Careers Wales, Pupil Destinations from Schools in Wales Survey

Causes of disengagement

The Annual Population Survey provided more detailed information on the reasons why young people 19-24 are NEET (Table 5). Almost 60 per cent of 19-24 year olds and 40 per cent of 16-18 year olds who are NEET, were considered 'economically inactive' rather than 'unemployed', mainly due to their family or caring responsibilities or because long-term ill health or disability that prevented them engaging in education, training or employment. More than half (56 per cent) of 19-24 year old women who are NEET are not working because they have caring or family responsibilities⁴⁴. Other research has found that the proportion of young people who are inactive because of ill-health or disability in Wales is twice the England and Wales average: four local authorities (Neath Port Talbot, Bridgend, Blaenau Gwent and Torfaen) have the highest rates of inactivity because of ill-health or disability in England and Wales⁴⁵.

Table 5 – Analysis suggests that 40 per cent of 16-18 year old NEET and almost 60 per cent of 19-24 year NEET are economically inactive because of caring responsibilities, illness or other reasons

	16-18 year olds (% all NEET)	19-24 year olds (% all NEET)
Unemployed	60	43
Economically inactive	40	57
Ill health or disability	8	16
Family or other caring responsibilities	10	31
Other	23	9

Source: Analysis of Annual Population Survey, Three-year average 2008-2010 reported in Welsh Government (2012) Further Analysis of data related to Young People Not in Education, Employment or Training (NEET) Tables 5 and 6

Destinations of young people after year 11

There has been a long-term increase in the proportion of young people continuing in education after 16 which has continued in recent years. In 2013, 86 per cent entered full-time education compared to 74 per cent in 2004. In 2013, a further 6.5 per cent entered some form of work-based learning. Very few entered employment, a smaller proportion than in 2004 (Table 6).

⁴⁴ Welsh Government (2012) Further Analysis of data related to Young People Not in Education, Employment or Training (NEET), Statistical Article March 2012, Tables 5, 6, 7, and 8.

⁴⁵ Office of National Statistics (2014) Young people in the Labour Market 2014

Table 6 – An increasingly large majority of young people continue in education after year 11

	2003 % Year 11 leavers	2013 % Year 11 leavers
Continuing in full-time education ¹	74.4	86.4
Continuing in part-time education (less than 16 hours a week) ²	-	0.4
Work Based Learning ³	7.6	6.5
Employed	6.5	1.4
Known not to be in Education, Training or Employment	7.0	3.7
Known to have left Wales	1.9	0.8
Destination is not known	2.6	0.8

Notes:

- 1 Includes education in school, further education colleges and independent schools.
- 2 Those studying part-time (less than 16 hours a week) were previously included as NEET.
- 3 Includes all Government supported work-based training without employed status, Modern Apprenticeships and other Government-supported training of employees.

Source: Careers Wales, Pupil Destinations from Schools in Wales Survey 2013.

Young people are often very mobile, some switching education and training providers several times, perhaps because their aspirations change or they regret their initial choice. Currently, statistics on the proportion of young people who are NEET record their destination in October, three months after the end of compulsory education. However we know that sizeable proportions of young people subsequently change their choices and may drop out of education or training courses. Looking at further education, the Welsh Government collects figures on the proportion of learning activities withdrawn (ie, ended without being completed) in further education institutions⁴⁶. In 2012, 15.4 per cent of the further education learning activities undertaken by learners aged 16-19 that were expected to end in 2011/12 were withdrawn (4.5 per cent ended within eight weeks of starting and 10.9 per cent subsequently). The proportion of learning activities withdrawn varied between institutions from 10 per cent to 22 per cent. Further Education Institutions have worked to improve their retention rates over time. Good careers guidance and advice plays a part in helping young people make suitable initial choices to ease young people's transition towards further education, training or employment. However further work is required to understand the variation between colleges and to increase retention rates.

⁴⁶ These figures do not equate to the number of learners as individuals often undertake several activities. They exclude learners transferring between activities. Comparable information is not available for schools.

Appendix 3

Summary of findings from fieldwork in councils

For a fuller report on the findings please see the accompanying document *Reducing the number of young people who are not in education, employment or training – findings from a review of councils in Wales* published with this report.

This study was based on a range of work in local government:

- we reviewed councils' work to reduce the numbers of young people NEET and considered if they are well placed to enable better outcomes for young people who are, or are at risk of becoming, NEET;
- we considered the latest data and key strategic documents⁴⁷ of all 22 councils in Wales as well as the outputs of a self-assessment exercise that councils undertook for the Welsh Government in Spring 2013;
- we visited eight councils⁴⁸ between May and July 2013 and spoke to councillors, officials and partner organisations as well as reviewing a range of council documents, organisational plans and strategies;
- we undertook work in Swansea and Wrexham Councils to follow-up the findings of research conducted in 2011 to examine whether good practice identified had been sustainable; and
- we also reviewed the Welsh Government's *Youth Engagement and Progression Framework and Implementation Plan* (the Framework) published in October 2013.

We concluded that councils are clearly committed to further reducing the proportion of young people who are NEET, especially those aged 16-18, but planning is variable and councils have made less progress in understanding the costs or evaluating the effectiveness of interventions.

Councils are clearly committed to improving outcomes for young people and understand the social costs of not doing so, but their understanding of the financial cost of achieving their goals is weak

Councils have a clear commitment to reducing the numbers of young people who are NEET, especially for young people aged 16-18. Councils welcomed the publication of the Welsh Government's Framework and the Welsh Government's general approach.

Generally councils have a good understanding of the social and economic impact of young people becoming NEET, including poorer health outcomes, crime and antisocial behaviour. However, whilst most plans note the financial cost to society of a high NEET population, plans rarely make reference to the cost of achieving the council's objectives including the opportunity costs or calculate the costs to the council itself or their partners.

⁴⁷ We reviewed a range of strategic documents including councils' Improvement Plans, Single Integrated Plans, Strategic Equality Plans and their NEET Strategies where available.

⁴⁸ Fieldwork took place in Caerphilly, Cardiff, Vale of Glamorgan, Carmarthenshire, Conwy, Rhondda Cynon Taf, Torfaen and Flintshire Councils between May and July 2013. Fieldwork was also undertaken in Ceredigion County Council in Autumn 2013.

Despite a relatively good evidence base, the quality of council's strategic planning is variable and accountability arrangements are sometimes unclear

Council planning is supported by a good and improving evidence base on the needs and whereabouts of young people who are NEET or at risk of becoming so and the range of provision available for them. However, some councils lack detail on the local profile of young people who are NEET. Some are developing processes to track the destinations of young people in Year 11 although, for some, difficulties in sharing data between organisations are a barrier to effective tracking, particularly for young people over 19. Councils are developing a variety of approaches with schools to identify pupils at risk of becoming NEET but few have evaluated the effectiveness of their approaches.

Councils have a strategic responsibility for co-ordinating and developing local services to reduce the number of young people who are NEET. But we found that some councils and their partners were unclear about the councils' responsibilities, especially for young people aged 19-24. Many councils have not set quantifiable targets and performance measures against which they can monitor progress. In some councils, the arrangements for holding partners to account are unclear.

The degree to which councils include partners in planning varies. The ability of councils to hold all partners and providers to account was sometimes limited by the large numbers of providers working with young people who are, or are at risk of becoming, NEET and by a lack of information from some providers on the outcomes of their work. The relatively rapid turnover in some providers has implications for the development of local partnerships, which may take some time to develop into effective working relationships.

Dependence on short term grants and contracts often leads to provision that is not necessarily related to locally identified needs. Some councils expressed concerns that the level of current provision is not sustainable in the face of cuts in grants and EU funding.

Although outcomes for young people have improved, a lack of routine evaluation means that the contribution of individual interventions is often unclear, the contribution of partners is variable and the views of young people have relatively little influence on councils' work

Councils do not have a common approach to evaluating the large number of projects and programmes provided by organisations working with young people in their areas, so it is difficult to assess effectiveness and value for money. Councils have limited evidence on the effectiveness of interventions for the target group in their area. Evaluation is not undertaken routinely and some councils had difficulty obtaining information on the outcomes of programmes and interventions from partners.

Councils have worked with schools, further education colleges, work based learning providers and other partners to identify and support young people at risk of becoming NEET. However, tension between partners who are in competition for learners was reported as a barrier to effective joint working.

Generally, councils reported difficulty engaging with employers to develop employment and training opportunities, including apprenticeships and work experience. There were, however, some examples of positive work with local businesses and where councils had developed their own apprenticeship programmes targeted at young people.

Some councils have developed innovative ways to use the internet and social media to engage with and contact young people. We found examples of councils consulting young people about the services they use and also where councils have taken additional steps to engage with hard to reach groups of young people. However, all councils recognised that they could do more to incorporate young people's views more systematically into service planning and delivery.

Recommendations

The Welsh Government's Framework and Implementation Plan requires councils to map services, establish early identification arrangements, establish lead worker provision and to develop and discuss their plans for reducing NEET with the Welsh Government. In addition, councils should:

- R1 Together with partners, map and review expenditure on NEET services to better understand resources required to deliver the Framework.
- R2 Clarify their strategic approach to reducing the proportion of 19-24 year olds who are NEET as well as their approach for 16-18 year olds.
- R3 Focus on young people with significant or multiple barriers to engaging in employment, education or employment rather than those who are more likely to re-engage without significant additional support.
- R4 Develop their objectives and targets for reducing the numbers of young people who are NEET so that they can be held to account and their work is aligned with the Welsh Government's targets and objectives.
- R5 Ensure that elected members and partners fully understand that councils have clear responsibility for leading and coordinating youth services for 16-24 year olds.
- R6 Improve the evaluation of the effectiveness and relative value for money of the services and interventions in their area intended to reduce the numbers of young people who are NEET.

Appendix 4

Comparison of policies to reduce the number of young people who are NEET in the UK

The Welsh Government provided a comparison of rates of young people who are NEET for each country within the UK based on data from the Annual Population Survey (Table 7). This showed that the percentage of 16-18 year olds who are NEET in Wales in 2013 was higher than the UK average although Scotland has a higher proportion NEET at this age. The proportion of 19-24 year olds who are NEET is also above the UK average.

Table 7 – Estimates of the proportion of young people NEET show that the proportion of young people who are NEET in Wales is above the UK average in 2013

	16-18 year olds % NEET	19-24 year olds % NEET
Wales	11.8	20.3
Scotland	12.5	17.5
Northern Ireland	6.1 ¹	20.5
England	9.4	19.0
UK	9.7	19.0

Note:

¹ Statistics are classed as low quality as they are based on less than 40 responses

Source: Annual population survey, presented in Welsh Government Statistical Bulletin (2014) Young people not in education, employment or training (Year to 31 December 2013) SB 41/2014, Table 4.

Strategies across the UK and Ireland aimed at reducing the number of young people NEET have a number of common features⁴⁹:

- Include early preventative intervention and additional support while at school to prevent a young person becoming NEET.
- Distinguish between those young people who are NEET with or without barriers to engagement.
- Recognise that young people who are NEET are not a homogenous group and that disengagement from education, employment and training is often linked to other risk factors for social exclusion. Policy responses need to reflect the range of risk factors that young people at risk of being NEET experience.
- Inter-departmental policy-making. Often policies for reducing the number of young people NEET are offered on a localised basis which offers opportunities to share experience and disseminate good practice.
- Develop support focussed on the transition points that young people face. At each transition, young people risk failing to make a successful move to the next stage (eg, from primary to secondary school or at the end of compulsory education).

⁴⁹ Department for Employment and Learning, Northern Ireland, A Scoping Study of those Young People Not in Education, Employment or Training in Northern Ireland, 2010.

UK context

Some of the most important policy levers for influencing rates of young people in employment are reserved for the Westminster Government including UK fiscal policy and welfare policy, benefits and reform. These areas particularly affect young people aged 18 and over and are complemented, but not replaced, by Welsh Government initiatives such as Jobs Growth Wales⁵⁰:

- i **Work programme** – is the UK Government's policy for transferring people from welfare to work. Introduced in 2011, it focuses on people who are long term unemployed or at risk of being so. People are referred to a range of private, public and third sector organisations (known as providers) that are paid primarily on results. In Wales and Scotland, people on the Work Programme are ineligible for other ESF-funded training although in England, Work Programme participants are able to participate in the range of ESF-funded training opportunities.
- ii **The Youth Contract** – is a £1 billion programme aiming to help young people 18-24 find employment. The Youth Contract includes support for businesses employing an 18-24 year old who has been unemployed for at least six months through Jobcentre Plus or the Work Programme. Businesses receive a wage incentive up to £2,275 per employee. The Youth Contract also offers work experience to young people.

UK economic growth has a strong impact on youth unemployment among 19-24 year olds than 16-18 year olds as very few 16-18 year olds enter employment. Since 2008, the proportion of 19-24 year olds who are NEET rose from 16.9 per cent in quarter 3 of 2008 to 22 per cent by the end of 2009 and has not fallen below 20 per cent since. The influence of general economic conditions on youth employment is probably why the Welsh Government set a target for reducing the proportion NEET among 19-24 year olds relative to the UK position as a whole.

Other nations of the UK have applied different approaches to reducing the number of young people not in employment, education or training. However, they share some common characteristics including cross-governmental approaches; guaranteed places in education or training for young people (aged 16-17 in England and Northern Ireland, and 16-19 in Scotland); provision of apprenticeships; and financial incentives for employers providing work placements.

England

In England, responsibility for reducing the number of young people who are NEET is shared between the Department for Education, the Department for Business, Innovation and Skills and the Department for Work and Pensions. However, there is an overlap in responsibility for young people aged 18-19 between Connexions (overseen by the Department for Education) and the Department for Work and Pensions. A National Careers Service was set up in 2012 to provide advice and guidance to all ages.

⁵⁰ The Jobs Growth Wales programme started in April 2012. It provides unemployed young people aged 16-24, with a job opportunity for a six-month period. Participants are paid at or above the national minimum wage for a minimum of 25 hours per week. Under the terms of the Programme, young people will be employed for the duration of the programme and the jobs created must be additional to, and not replace, positions that would otherwise be filled. Young people can move straight into a Jobs Growth Wales opportunity from further education, work based learning or apprenticeships. People participating in the Work Programme are not eligible for opportunities through Jobs Growth Wales.

The UK government has increased the age to which all young people in England must continue in education, training or employment with training, requiring them to continue until the end of the academic year in which they turn 17 from 2013 and until their 18th birthday from 2015. This is supported by the 'September' and 'January Guarantee' that Connexions contact all 16 and 17 year olds to offer a place in education or training and by the National Apprenticeship Service. Councils in England have responsibility for commissioning education provision for 16-19 year olds using the Working Neighbourhoods Fund and European Social Fund.

Scotland

The Scottish Government appointed the UK's first dedicated Youth Employment Minister in 2011 with the responsibility for tackling youth unemployment and delivering the government's commitment that all 16-19 year olds in Scotland will be offered a learning or training place.

Modern Apprenticeships are an important element of the Scottish Government's response to youth unemployment. Modern Apprenticeships provide industry-specific training opportunities post 16. There are also a number of training programmes including 'Get Ready for Work'; 'Training for Work' and financial incentives for employers to provide flexible training opportunities. Community Jobs Scotland provides paid work experience in the third sector for unemployed 16-19 year olds who are not accessing alternative government support.

Northern Ireland

The Northern Ireland Executive launched its NEET Strategy 'Pathways to Success' in 2012. The Strategy focuses on prevention for young people under 16 beginning with early years support; education or training provision for NEET aged 16-18; and opportunities for young unemployed people aged 18-24.

Support for 16-18 year olds includes 'Training for Success' which offers a guaranteed training place for every 16-17 year old NEET; apprenticeship programmes; a training allowance; free of charge essential skills qualifications and a range of community and voluntary sector programmes. Provision for 18-24 year olds includes the 'Graduation Acceleration Programme' to assist unemployed graduates; financial incentives for employers and a structured timetable of support for NEET starting from the first weeks of a benefit claim. The NEET Strategy describes a range of other measures to support NEET initiatives including childcare provision; the creation of employment opportunities through social clauses in public sector procurement; and an Innovation Fund to test new approaches.

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CABINET - 10TH DECEMBER 2014

SUBJECT: DISPOSAL OF LAND OFF WOODBINE ROAD, BLACKWOOD

REPORT BY: ACTING DIRECTOR OF CORPORATE SERVICES AND S.151 OFFICER

1. PURPOSE OF REPORT

- 1.1 To seek Cabinet approval for the disposal of land off Woodbine Road, Blackwood (edged blue and red on the attached plan) to the Seren Group ("Seren") for the development of affordable housing.

2. SUMMARY

- 2.1 The site edged blue (former Blackwood Youth Centre) has been declared surplus to operational requirements and is currently held by Property Services, pending disposal.
- 2.2 The adjoining land, edged red, is currently used for garage plots. The site is under-utilised and, currently, only two plots are leased to a local resident; one has a garage erected on it, and the other is a hard standing. There is other, unauthorised, parking on the site, but there is no operational requirement for the land, other than for affordable housing, as envisioned by this report.
- 2.3 Approval of the recommendation will allow Seren to prepare a scheme in consultation with relevant officers to identify a mix of properties that addresses the needs identified within the Council's Housing Register.

3. LINKS TO STRATEGY

- 3.1 The contents of this report link to the following key strategic objectives:-

"Ensure an adequate and appropriate range of housing sites are available across the County Borough in the most suitable locations to meet the housing requirements of all sections of the population" (Objective 9 of the Local Development Plan)

"To meet housing requirements through the provision of a range of good quality, affordable housing options." (Aim 5: Affordable Housing – CCBC Local Housing Strategy 2008 - 2013)

"To promote sustainable and mixed communities that are located in safe and attractive environments." (Aim 11: Community Regeneration - CCBC Local Housing Strategy 2008 - 2013)

4. THE REPORT

- 4.1 The site edged blue (former Blackwood Youth Centre) has been declared surplus to operational requirements and is currently held by Property Services, pending disposal.

4.2 The Council also owns the adjoining land edged red, which is currently used for garage plots. The site is under-utilised and, currently, only two plots are leased to a local resident; one has a garage erected on it, and the other is a hard standing. There is other, unauthorised, parking on the site.

Under the terms of the standard garage lease, the council is able to terminate an agreement by serving one month's written notice on the tenant.

4.3 An operational housing use for the site has been identified, for the provision of affordable housing as there is strong evidence of housing need in the Blackwood area. The Local Housing Market Assessment demonstrates a shortfall of affordable homes within the County Borough and a requirement to deliver 530 units per annum throughout the County Borough. There are in excess of 400 applicants requiring social rented accommodation in this area.

4.4 As there is a housing need in this area of the County Borough, Policy CW 11 (Affordable Housing) of the Council's Local Development Plan will apply to this site, as it is capable of being developed for 5 or more dwellings. Subject to viability of the development, any developer will be under an obligation to provide an element of affordable housing as part of its development. However, if the land is sold to Seren, 100% affordable housing will be achieved.

There is no alternative operational requirement for the land edged red, and officers have no objection to its sale.

4.5 Under the Welsh Government's Social Housing Grant funding programme, Housing Associations are zoned to operate in specific local authority areas for affordable housing development. There are four zoned housing associations within Caerphilly. These are:

- United Welsh Housing Association,
- Seren Group,
- Linc Cymru, and
- Wales and West Housing Association.

4.6 Wales and West Housing Association and Linc Cymru have chosen not to work in partnership with the Council on the Council's affordable housing development programmes. As such, the Council's currently zoned housing association partners are United Welsh, operating in the western valley and Seren, operating in the eastern valleys. As this site falls within the area zoned for Seren, it is the Council's partner for this scheme.

4.7 Seren will prepare a scheme in consultation with relevant officers to identify a mix of properties that addresses the needs identified within the Council's Housing register. Other benefits that Seren can bring are the emphasis on sustainable construction including Code for Sustainable Homes Level 3+ and Targeted Recruitment and Training (TR&T).

4.8 The Protocol for Disposal of Property states, at paragraph 8.1(iv), that in those cases where it is possible to market a property but the Head of Property is of the opinion that this course of action may not be in the best financial or service interests of the Authority, Cabinet approval will be obtained before direct negotiations are opened with a single party, and the views of ward members will be taken into consideration.

4.9 In the event that Seren is unable to proceed at market value (because its total cost of development, including land acquisition and build cost, is limited by Welsh Government regulations), a further report will be brought forward setting out options for members' consideration.

4.10 **Planning Issues**

1. Under Policy CW8 the LDP protects existing community uses unless alternative provision could be provided (the site does not lend itself to this) or it is demonstrated that the

building is not required for any community use, not just the use for which it was previously used. Planning objections would be raised on the grounds of policy CW8 if it is not demonstrated that the site is not required for a community use.

In this context, members will recall that the Youth Centre building was destroyed by fire in 2009, and the site subsequently declared surplus to the requirements of the Education and Leisure directorate in early 2011 when the Education and Leisure division advised that there is no evidence that additional community facilities are required in this area:

“One good example of the overprovision in the area is the Plas mawr community centre which is used for only approx 10% of its total possible opening times. We have Blackwood Library, Pontllanfraith school and leisure centre, Blackwood school and community college...Cefn Forest community centre, Penybryn community centre and Blackwood miners institute all closely located.”

Additionally, a replacement Youth Centre has since been constructed within Blackwood comprehensive School.

Officers consider this is sufficient evidence to overcome any objection in respect of LDP policy CW8.

2. In 2011, Planning advice was that the land edged red “is a developed area and does not form part of the open space to the north... There would be no objections raised to the redevelopment of the site, subject to alternative parking provision being made for those whose car parking would be removed. As with the Former Youth Centre, residential use would be the most suitable alternative use”.

Since then, use of the site has declined such that only two plots are leased to one local resident, who has the option to park within his own curtilage, if and when the council terminates the garage lease.

Other parking on this land is unauthorised and officers do not consider it necessary to make specific provision for unauthorised use of council-owned land.

3. Highways officers have indicated that the lane to the rear of 18-40 Woodbine Road is adopted, and that improvements would be required at either possible access to accommodate redevelopment.
4. Drainage officers have also advised that if the land is to be sold for development the applicant would be required to submit comprehensive proposals showing how surface water and land drainage flows from the site would be dealt with and development of the site should not proceed until these have been agreed by the authority in liaison with Welsh Water.

- 4.11 Seren will submit a planning application, the outcome of which will be determined in accordance with the relevant policies contained within the adopted Local Development Plan.

5. EQUALITIES IMPLICATIONS

- 5.1 An EqlA screening has been completed in accordance with the Council’s Equalities Consultation and Monitoring Guidance and no potential for unlawful discrimination and for low level or minor negative impact have been identified, therefore a full EqlA has not been carried out.

6. FINANCIAL IMPLICATIONS

6.1 The disposal will produce a capital receipt.

7. PERSONNEL IMPLICATIONS

7.1 There are no personnel issues arising out of this report.

8. CONSULTATIONS

8.1 There are no views expressed as a result of consultation that differ from the recommendation.

9. RECOMMENDATIONS

9.1 That land off Woodbine Road, Blackwood be sold to the Seren Group for the development of affordable housing, on terms to be negotiated.

9.2 Approval of the detailed terms of the disposal be delegated to the Head of Performance and Property Services, for the purposes identified in the report.

10. REASONS FOR THE RECOMMENDATIONS

10.1 The asset is surplus to the operational requirements of Caerphilly CBC.

10.2 Paragraph 8.1(iv) of the Disposal Procedure in Part 4 of the Council's Constitution states that Cabinet approval will be obtained before direct negotiations are opened with a single party where it is possible to market a property but where the Head of Performance and Property Services is of the opinion that this course of action may not be in the best financial or service interests of the Authority.

10.3 To deliver an affordable housing scheme that meets with the needs identified within the Council's Local Housing Market Assessment and Housing register.

11. STATUTORY POWER

11.1 Local Government Acts 1972 and 2000, and The Local Government Act 1972: General Disposal Consent (Wales) 2003. This is a Cabinet Function.

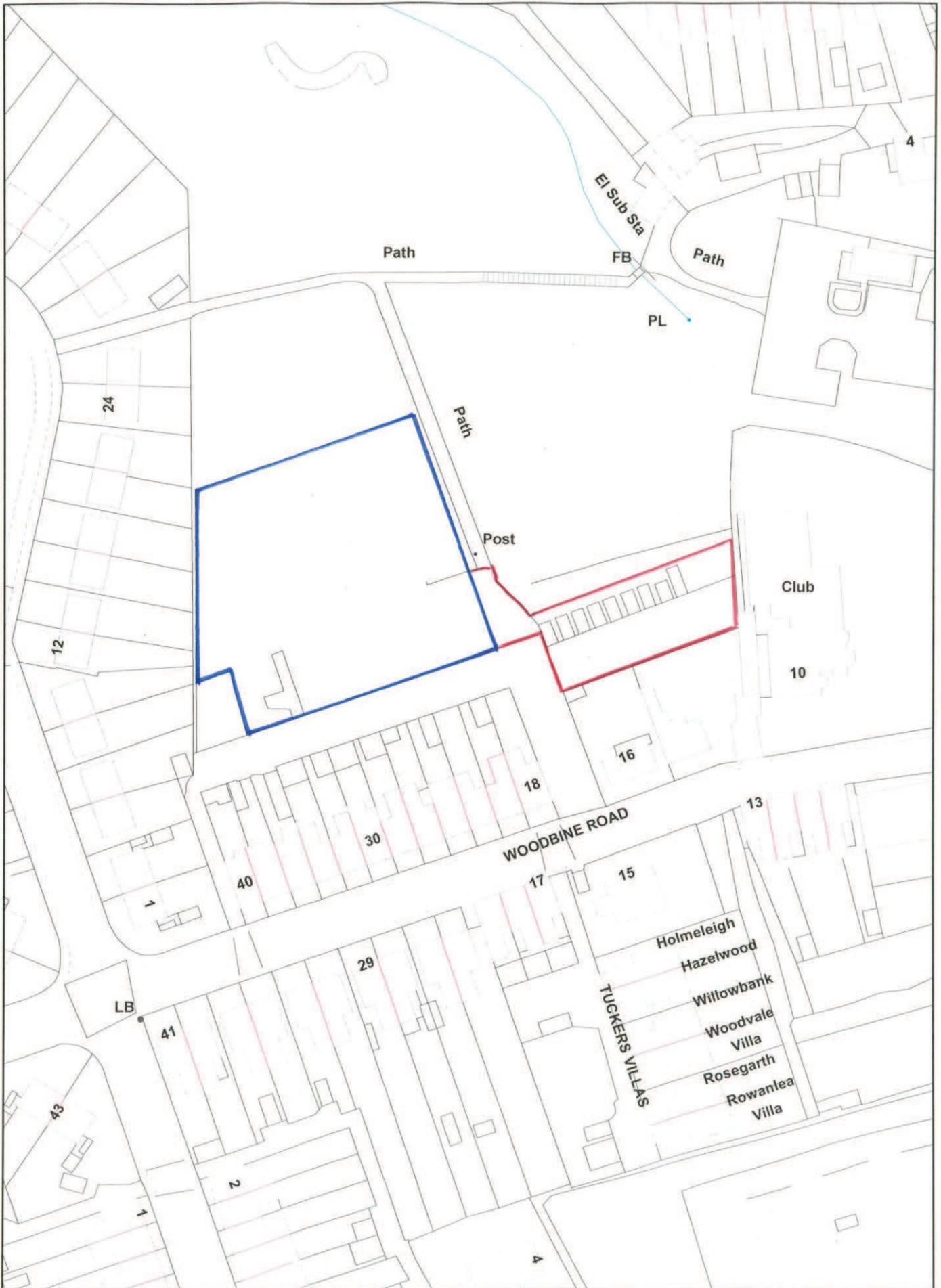
Author: Colin Jones - Head of Performance and Property Services
Consultees: Chris Burns - Interim Chief Executive
Nicole Scammell - Acting Director of Corporate Services
Shaun Couzens - Chief Housing Officer
Pauline Elliott - Head of Regeneration & Planning
Tim Stephens - Development Control Manager
Rhian Kyte - Team Leader Strategic & Development Planning
Clive Campbell - Transportation Engineering Manager
Gail Williams - Head of Legal & Democratic Services (Interim)
John Rogers - Principal Solicitor
David A Thomas - Senior Policy Officer (Equalities & Welsh Language)
Angharad Price - Deputy Monitoring Officer
Cllr D Hardacre - Cabinet Member for Performance and Asset Management and Ward Member

Cllr G Jones - Deputy Leader and Cabinet Member for Housing
Cllr Patricia Cooke - Ward Member
Cllr Nigel Dix - Ward Member
Cllr Allan Rees - Ward Member

Background Papers:
Local Development Plan

Appendices:
Appendix 1 Plan of Former Youth Centre (outlined in blue) and adjoining land (outlined in red)

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CABINET – 10TH DECEMBER 2014

SUBJECT: CWMCARN HIGH SCHOOL

**REPORT BY: ACTING DEPUTY CHIEF EXECUTIVE/CORPORATE DIRECTOR -
EDUCATION AND LIFELONG LEARNING**

1. PURPOSE OF REPORT

- 1.1 To update Members on the key issues arising from the work carried out at Cwmcarn High School (CHS) including the progress of the works, the HSE position, the final costs and action to mitigate against a similar situation arising in the future.

2. LINKS TO STRATEGY

- 2.1 The Local Authority is required to discharge its duty of care to pupils and also ensure that arrangements are in place to meet pupil's educational needs. In order to do so the Council has a duty to maintain all Schools.

3. BACKGROUND

- 3.1 As Members will be aware from previous reports to Council, the Cwmcarn High School site was closed on 12th October, 2012 to protect the health and well-being of pupils. The Council agreed on 23rd October, 2012 to fund the costs of transport to educate the pupils at the former Coleg Gwent site in Ebbw Vale, this was in the sum of £1.42million.
- 3.2 Following this, the Council agreed to fund asbestos removal and reinstatement works. The costs of this was £1,048million, based on the proposal put forward by asbestos consultants on behalf of the Governing Body of Cwmcarn High School, detailed in the attached report to Council on 17th April, 2013, referenced as a back ground paper to this Report.
- 3.3 The funding was agreed on the basis of a grant arrangement with the School. After the Council decision on 17th April, 2013, there followed a period of negotiation around the grant arrangement. On 17th June, 2013, the School agreed that the Council could undertake the works on their behalf instead of through a grant arrangement.
- 3.4 Works commenced on the site on 24th June, 2013 and a programme was put in place to ensure that the works were completed by 26th August, 2013. This allowed time for the School to be re-equipped ready for re-occupation on 2nd September, 2013. Initially works were progressing well at the site and in line with the programme.
- 3.5 Tragically, on 19th July, 2013 there was a fatality on site. The site was a crime scene for a week from that date and both the Police and HSE began investigations into the incident. The Corporate Health and Safety department still considered that the contractor could safely continue with the asbestos removal works and on 31st July, 2013, the Interim Chief Executive took the decision that the contractor could continue with the works.

- 3.6 As had been identified, further electrical works were required before the school could be reoccupied and the original asbestos works were delayed due to the investigation at the site, meant pupils could not return to site in September, 2013 as originally planned. On 23rd August, 2013, Cabinet agreed the continuation of funding to house the school on the Ebbw Vale site.

4. THE REPORT

4.1 Progress of the works

- 4.1.1 After the Cabinet decision in August, 2013, the pupils remained at the Ebbw Vale site until December, 2013. The pupils were then able to return to the Cwmcarn High School site in January, 2014.
- 4.1.2 The electrical works at the School began on 8th October, 2013 and finished on 19th November, 2013. The final costs of rectifying the electrical works were £132k. The cost was allocated in accordance with that previously agreed with all schools i.e. 75% by the Council and 25% by the school resulting in £99k and £33k respectively.
- 4.1.3 The Contractor completed the asbestos work on 17th October, 2013. The total cost of the asbestos related works amounted to £855k.
- 4.1.4 The asbestos removal project was based on the specification provided by the schools asbestos consultants after they had completed a detailed asbestos management survey of the school site. However, further asbestos was discovered during the planned removal works which had not been identified by their consultants survey. This work was able to be factored into the project, although this added to timescale and cost. A variation to contract was provided as the additional cost and time were not deemed significant.
- 4.1.5 As stated in the original Report to Council 17th April, 2013 any backlog of statutory maintenance works required was the responsibility of the school. The school is now in a position to carry out those works as the asbestos removal has been completed.
- 4.1.6 Following completion of the asbestos removal and remediation works, sample air testing was undertaken in numerous locations of the premises. All samples taken were tested at an independent UKAS accredited Laboratory. All samples returned levels below 0.0005 f/cm³. This was the required level the Council wanted to attain prior to reoccupation of Cwmcarn School.
- 4.1.7 On completion of the asbestos removal project, the Council commissioned an up to date asbestos management survey of the school building to record all asbestos remaining on the site. The Council's Asbestos Team Manager visited the school on the 23rd January, 2014 with the completed survey to give the site management team a clear understanding of where asbestos remains in the building. He advised how this should be managed going forward, including advising all staff of the asbestos management arrangements.
- 4.1.8 The school have commissioned the support of an asbestos consultant to draft an Asbestos Management Plan for the school in line with the requirements of the Control of Asbestos Regulations 2012.

4.2 Health and Safety Executive Assessment of Asbestos Risk

- 4.2.1 On the 19th July, 2013, the HSE published a Report (a copy will be found on the HSE website (www.hse.gov.uk/fot/cwmcarn-school-report.pdf) entitled 'Assessment of Potential Asbestos Risk at Cwmcarn High School'. The report detailed the opinion of the HSE's Principal Inspector in Occupational Hygiene on the risk posed to occupants of the school from the asbestos debris which was present within the roof voids and the risk from asbestos fibres and debris, within warm heater cabinets. The report concluded that the occupied areas of the

school were essentially uncontaminated and there was no evidence of elevated airborne fibre levels. The report also concluded that asbestos fibres present within the ceiling void and heater cabinets did not present a risk to occupants.

- 4.2.2 Members are aware from the previous Reports to Council that the views of the HSE expressed in their report were not supported by two firms of asbestos consultants and an eminent independent expert in the field of asbestos who was engaged by the Council to review the evidence prior to Council agreeing funds to undertake asbestos removal works at the school site. Their opinion was unanimous in recommending extensive removal and remediation works in order for the site to be safe for reoccupation.
- 4.2.3 The Health and Safety Laboratories (HSL) on behalf of HSE, undertook air sampling on site when the school was closed. Only when disturbance was undertaken were asbestos fibres detected in classrooms. It is likely, therefore, that when the school was fully occupied, that asbestos fibre levels in the air could be higher due to disturbance from normal school activity/behaviour. This was highlighted by an asbestos consultant engaged by the Council prior to closure of the school.
- 4.2.4 Due to the potential for fibre release from the asbestos debris present and the inability to properly maintain the school building, officers recommended that Council support the removal and remediation of asbestos at the school.
- 4.2.5 The HSE has not changed its position since the report was released on 19th July, 2013. The Council's primary consideration throughout has been the safety of pupils and staff occupying the school building. In this respect, based on all the evidence available, the decision taken by Council on 17th April 2013, to fund the removal and remediation project put forward by the school's asbestos consultant is still considered by officers to be the correct decision to have made.
- 4.3 The final costs**
- 4.3.1 At Council meetings held on 23rd October, 2012 and 17th April, 2013, it was agreed to fund in total £2.068m for works at CHS. This comprised £1.420m (23rd October, 2012) from which there was a £400k underspend on transport. This meant an actual funding resource of £1.020m was required. A further £1.048m was agreed at the meeting on 17th April, 2013.
- 4.3.2 Following the tragic fatality at the school site on 19th July, 2013, Cabinet were updated on 23rd August regarding the implications. This highlighted the necessity to continue at Ebbw Vale for a further 2 months i.e. to the end of the Autumn term, and detailed the level of additional costs incurred as a result of this.
- 4.3.3 This extension of time resulted in additional transport, security and premises costs, all of which are detailed in the table below. Figures include all remedial works and re-occupation costs with the exception of those costs pertaining to electrical works :-

Total costs of the closure of Cwmcarn High School site

Detail of Spend	COSTS £K
Asbestos	855
Transport	656
Excess Mileage	100
NNDR Utilities	127
Ebbw Vale lease	98
Security	80
Ebbw Vale Site Costs	73
Re-commissioning Costs	72
Removals	49

Leisure Centre/Sports Hire	34
Electrical Survey Report	15
	2159
Less budget	2068
Variance	91

4.3.4 The total cost resulting from the closure of CHS amounted to £2159k. The funding agreed by Council was £2068k. The additional costs of £91k were primarily due to the additional 2 months stay at Ebbw Vale resulting from the necessity to undertake electrical works at the site. The additional costs have been funded from the Directorate of Education and Lifelong Learning budget.

4.3.5 The original funding allocation of £2.068m was predicated on a return date of 4th November. Due to the additional electrical works, the school could not be reopened until 6th January, 2014.

4.4 Statutory Responsibilities

4.4.1 The Council is required to maintain all the schools in the County Borough under the School Standards and Framework Act 1998. Although Cwmcarn High School is a Foundation School, it is still classed as a maintained school under the above legislation.

4.4.2 However, the Governing Body of each School is responsible for the school premises under the Control of School Premises (Wales) Regulations 2008, they are also the duty holder under the Control of Asbestos Regulations 2012.

4.4.3 There has always been a requirement in the Funding Formulae for Schools for the Council to require Governing Bodies to use part of their budget to maintain School premises, in particular for health and safety and statutory maintenance works. This is then supplemented by the Educational Capital budget where schools can bid for additional projects.

4.4.4 The Governing Body also has the legal responsibility for health and safety in relation to the Cwmcarn School site and for employees of the School Cwmcarn High School is a Foundation School. It should be noted that the School is the sole employer of all employees at the School and is, therefore, responsible for their health and safety. (In all other Schools, save for St. Helen's RC Primary School, the Council is the employer and has legal obligations.) Additionally, the Governing Body as Trustees of Cwmcarn High School have a lease in relation to the School site and they have responsibilities for the health and safety of anyone who enters the site. (Again in all other schools, save for St. Helen's RC Primary School, the Council owns the site and also has legal obligations).

4.4.5 In order to assist a Governing Body with their health and safety responsibilities, the Council offers a service through the Health and Safety Department. This involves inspections of buildings, equipment as well as audits of systems and procedures, along with advice, guidance and training for relevant staff. This service is offered to all schools and a premium service is offered to primary schools. However, the service offered to Cwmcarn High School and St Helen's RC Primary School, takes into account the legal responsibilities placed on the Governing Body of each of these schools to ensure that roles and responsibilities are clearly set out.

4.6 Actions to mitigate against a similar situation arising in future

4.6.1 In future should any school, within the County Borough decide not to take up a Health and Safety service level agreement with the Council as described in paragraph 4.4.5 above, arrangements will be put into place to undertake a two yearly site inspection and audit of systems and procedures at such schools. Findings will be formally reported to the Headteacher, Chair of Governors and the Director of Education with any recommendations for improvement, and progress duly monitored.

5. EQUALITIES IMPLICATIONS

- 5.1 All equalities implications have been given due consideration throughout the completion of the works and the compilation of this report.

6. FINANCIAL IMPLICATIONS

- 6.1 As stated above, the total costs arising from the works at the Cwmcarn High School site were £2.159m. This was funded through general balances as agreed by Council on 23rd October 2012 and 17th April 2013 in the sum of £2.068m and the additional £91k from the Education and Lifelong Learning Budget as approved by Cabinet on 23rd August 2013.
- 6.2 The costs for the electrical works amounted to £132k. These costs are to be funded, as with all other schools, on a 75/25 basis, £99k to be funded from the Education capital programme and £33k by the school.

7. PERSONNEL IMPLICATIONS

- 7.1 There are no personnel implications for the Council. The Governing Body employs all staff, including the Headteacher at Cwmcarn High School, as it is a Foundation School.

8. CONSULTATION

- 8.1 This Report is for information purposes. The draft Report was consulted upon with the consultees listed in the Report. Comments were received from the School Governors which express a contrary view on the legal responsibilities in relation to the School as set out in the Report and express concerns about the measures outlined at paragraph 4.5 of the Report.

9. RECOMMENDATIONS

- 9.1 Members are asked to note the content of the report with regard to the completion of the works, HSE position and the mitigation measures proposed to limit to the potential of a reoccurrence of a similar problem.

10. REASONS FOR RECOMMENDATIONS

- 10.1 To ensure arrangements are in place to support continuity in teaching and learning for all Schools in the County Borough.

11. STATUTORY POWERS

- 11.1 School Standards and Framework Act 1998
Local Government Act 1972.

Author: Tony Maher, Assistant Director Planning & Strategy
Email: mahert@caerphilly.gov.uk

Consultees: Corporate Management Team Members
Education and Lifelong Learning Senior Management Team
Cllr Rhiannon Passmore, Cabinet Member for Education and Lifelong Learning
Jacqui Peplinski – Headteacher, Cwmcarn High Schools
Gary Thomas – Chair of Governors, Cwmcarn High School
Donna Jones – Health and Safety Manager
Gail Williams – Interim Head of Legal Services/Monitoring Officer

Angharad Price – Interim Deputy Monitoring Officer/Barrister, Legal & Democratic Services
Sue Richards, Principal Finance Officer Education
Jane Southcombe, Group Accountant Education
Richard Phillips, Asbestos Team Manager

Background Papers:

Report to Council: 23rd October 2012

Report to Council: 17th April 2013

Report to Special Cabinet: 24 August 2013



CABINET - 10TH DECEMBER 2014

SUBJECT: THE NATIONAL ASSISTANCE ACT 1948, AS AMENDED – REMOVAL OF PERSONS IN CARE - DESIGNATION OF PROPER OFFICER

REPORT BY: ACTING DEPUTY CHIEF EXECUTIVE

1. PURPOSE OF REPORT

- 1.1 To agree Proper Officer arrangements to provide expert support to the local authority in discharging its responsibilities under Section 47 of the National Assistance Act 1948, as amended.

2. SUMMARY

- 2.1 When the Local Authority considers it necessary to use available powers to seek the removal of a person living in insanitary conditions through reasons of physical incapacity, infirmity or illness a Proper Officer is required to carry out a medical assessment and issue a certificate. The previously appointed Proper Officers are no longer in relevant posts and this Report seeks approval to appoint replacements.

3. LINKS TO STRATEGY

- 3.1 The Council has a statutory responsibility for the health and social care of its residents.
- 3.2 The provision of expert support as noted in 1.1, also supports the Healthier and Safer themes of Caerphilly Delivers, the LSB single integrated plan.

4. THE REPORT

- 4.1 The legislation provides a procedure aimed at serving the necessary care and attention for persons who are living in insanitary conditions through reasons of physical incapacity, infirmity or illness. These are people who are unable to devote proper care and attention to themselves and are not receiving care from others.
- 4.2 These circumstances occur rarely and usually come to the attention of the local authority through officers from Social Services or Environmental Health following up expressions of concern from neighbours or visitors.
- 4.3 In most cases these persons will accept offers of care and support. However, where the person does not voluntarily accept support, and it is deemed that the local authority should act in the interest of this person, or to prevent injury or nuisance to other persons, there is a procedure to require their removal to a suitable hospital or other place.

- 4.4 To determine whether such action is necessary, the legislation allows the local authority to appoint a Proper Officer. The Proper Officer appointed in March 2011, is no longer in the relevant post and it has therefore become necessary to appoint an interim replacement. Dr Liam Taylor MB, BCh, BAO, DCH, DGM, DRCOG, Dip Ther, MRCGP, Deputy Medical Director, Aneurin Bevan Health Board, Llanarth House, Bridge Street, Newbridge, has agreed to act in this capacity as Interim Proper Officer for the Council. Dr Sharan Ramakrishna, MD FRCP Edin., Consultant Physician and Geriatrician based at Ysbyty Ystrad Fawr Hospital, remains as an alternative Proper Officer in his absence.
- 4.5 When the Local Authority wishes to use the available powers, the Proper Officer is required to carry out an assessment and issue a certificate. A Magistrates Court may then order the removal of the person. Additionally, there is an accelerated process if deemed appropriate that requires an additional signature on the Certificate by a medical practitioner (usually the person's GP) and the removal can be ordered by a Justice of the Peace.

5. EQUALITIES IMPLICATIONS

- 5.1 The provision of expert support in such cases as described in 4.1 also supports a number of Equalities and Human Rights matters, potentially covering age related issues, mental and/or physical disability issues and the underlying dignity aspects of these agendas.

6. FINANCIAL IMPLICATIONS

- 6.1 The Proper Officer will require reimbursement for the assessment. However, the costs should be able to be covered by existing budgets due to the infrequency of this service requirement.

7. PERSONNEL IMPLICATIONS

- 7.1 There are no personnel implications.

8. CONSULTATION

- 8.1 This report has been sent to the Consultees listed below and all comments received are reflected in this report.

9. RECOMMENDATION

- 9.1 It is recommended that Dr Liam Taylor be designated the Proper Officer in carrying out the Council's statutory responsibility under the National Assistance Act 1948 as amended, and that Dr Sharan Ramakrishna be designated alternative Proper Officer.

10. REASONS FOR RECOMMENDATIONS

- 10.1 In order to comply with statutory requirements and to enable the Council to have expert medical support in issuing the certificate required by the legislation.

11. STATUTORY POWER

- 11.1 The National Assistance Act 1948 and The National Assistance (Amendment) Act 1951. The discharge of duties under the above legislation is a Cabinet function.

Author: Ceri Edwards, Environmental Health Manager
Consultees: Councillor D Poole, Cabinet Member for Community and Leisure Services
Councillor R Woodyatt, Cabinet Member for Social Services
Dave Street, Corporate Director Social Services
Sandra Aspinall, Acting Deputy Chief Executive
Jo Williams, Assistant Director, Adult Services
Gail Williams, Interim Head of Legal Services & Monitoring Officer
Rob Hartshorn, Head of Public Protection
David A. Thomas, Senior Policy Officer (Equalities & Welsh Language)
Mike Eedy, Finance Manager
Sian Phillips, Human Resources Manager

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CABINET - 10TH DECEMBER 2014

SUBJECT: COUNCIL TAX BASE 2015-2016

REPORT BY: ACTING DIRECTOR OF CORPORATE SERVICES AND S151 OFFICER

1. PURPOSE OF REPORT

1.1 For Cabinet to agree the calculation of the Council Tax Base for 2015/16.

2. SUMMARY

2.1 The report provides details of the Council Tax base for 2015/16 for tax setting purposes and the collection percentage to be applied.

3. LINKS TO STRATEGY

3.1 The Council Tax is a significant resource which assists the Council in achieving its various strategies.

4. FINANCIAL IMPLICATIONS

4.1 The Local Government Finance Act 1992 and The Local Authorities (Calculation of Council Tax Base) (Wales) Regulations 1995 sets out the rules for the calculation of the Council Tax base. This is the amount required by the Local Government Finance Act 1992 to be used in the calculation of the Council Tax.

4.2 The Council Tax base for discounted chargeable dwellings expressed as Band D equivalents has been calculated at 61,152.72 for 2015/16. This is a **0.52%** increase on 2014/15. Members are advised that increases in Band D equivalents can result in a reduced Revenue Support Grant when the final settlement announcement is made in December 2014. Hence at this stage, additional income cannot be factored into the budget setting process for 2015/16.

4.3 For 2014/15 a collection rate of 97% was assumed. The collection rates for Council Tax have steadily increased over recent years, in fact the in-year collection rate for Council Tax in 2013/14 matched the 2012/13 rate which was the best ever performance for Caerphilly CBC. This has been achieved against the backdrop of reduced staffing levels, with staffing being reduced in recent years from 31 to 24.5. The Authority pursues Council Tax arrears and this results in the collection rate of 97% being regularly exceeded. This generates a Council Tax surplus at the financial year end. For 2013/14 the Council Tax surplus was £1.27m. Members should note that the surplus is used to support the Authority's base budget.

4.4 Following the abolition of Council Tax Benefit in 2013/14 by the UK Coalition Government, Welsh Government (WG) has decided to maintain entitlements under the Council Tax Reduction Scheme (CTRS) until 31st March 2017. In November 2013 WG brought forward regulations placing a duty on Local Authorities to introduce Council Tax Reduction Schemes

for 2014/15, this has been extended for 2015/16, and requires all Welsh Authorities to maintain full entitlements for all eligible claimants and retains the national framework scheme which was introduced in 2013/14.

- 4.5 Since 2014/15 funding for the CTRS has been included within the Revenue Support Grant at 2013/14 levels. This means that Local Authorities must take account of any additional CTRS costs arising from their decisions about Council Tax levels for 2015/16. Any increase in CTRS expenditure would have to be met by the Authority and therefore it would be prudent to apply the same percentage increase in the Council Tax for 2015/16, to the total funds set aside for the CTRS. An element of the increased revenue from Council Tax would then need to be set aside to fund the increased CTRS costs.
- 4.6 Looking forward WG commissioned a review looking at the options for a longer-term solution which will provide an equitable and sustainable Scheme within the available funding to be implemented from 2017/18 onwards.
- 4.7 The Council Tax base for 2015/16 is 61,152.72 x 97% which equates to 59,318.14. The Council Tax base analysed over community council areas is as follows:

Community Council	Band D Equivalent
Aber Valley	1,996.04
Argoed	843.52
Bargoed	3,564.97
Bedwas, Trethomas & Machen	3,761.31
Blackwood	2,871.52
Caerphilly	6,050.10
Darran Valley	700.31
Draethen, Waterloo & Rudry	588.93
Gelligaer	6,189.13
Llanbradach & Pwllpant	1,454.24
Maesycwmmmer	765.28
Nelson	1,567.59
New Tredegar	1,335.83
Penyrheol, Trecenydd & Energlyn	4,410.13
Rhymney	2,523.24
Risca East	2,037.75
Risca West	1,765.31
Van	1,626.69
Areas without Community Councils	15,266.25
Total	<u>59,318.14</u>

5. EQUALITIES IMPLICATIONS

- 5.1 There are no potential equalities implications of this report and its recommendations on groups or individuals who fall under the categories identified in Section 6 of the Council's Strategic Equality Plan, therefore no Equalities Impact Assessment has been carried out.

6. PERSONNEL IMPLICATIONS

- 6.1 There are none.

7. CONSULTATIONS

7.1 There are no consultation responses which have not been reflected in this report.

8. RECOMMENDATIONS

8.1 It is recommended that:

- The Council Tax collection rate of 97% remains unchanged for 2015/16.
- CTRS funding is increased by the same percentage as the Council Tax for 2015/16. This will be funded by setting aside funding from anticipated Council Tax income as outlined in paragraph 4.5.
- The Council Tax Base for the year 2015/16 be 59,318.14, with the Council Tax Base for each community council area as outlined in paragraph 4.7.

9. REASONS FOR THE RECOMMENDATIONS

9.1 To determine the Council Tax base for 2015-2016.

10. STATUTORY POWER

10.1 Local Government Finance Act 1992 and regulations made under the Act.

Author: S. Harris, Interim Head of Corporate Finance
Tel: 01443 863022 E-mail: harrisr@caerphilly.gov.uk

Consultees: C. Burns, Interim Chief Executive
Cllr K. Reynolds, Leader of Council
Cllr B Jones, Deputy Leader/Cabinet Member for Corporate Services
N. Scammell, Acting Director of Corporate Services & Section 151 Officer
J. Carpenter, Council Tax & NNDR Manager
S. O'Donnell, Principal Council Tax & NNDR Officer
A. Southcombe, Finance Manager, Corporate Finance

Appendices:

Appendix: Council Tax Dwellings Return for 2015-2016

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Please select your authority and if necessary, amend address

Mrs Nicole Scammell

Caerphilly County Borough Council ▼

Penallta House
Tredomen Park
Ystrad Mynach
CF82 7PG

If necessary, please amend the name and telephone number of our contact in case of queries:-

Name: Sean O'Donnell

E-mail (please enter N/A if unavailable): odonns@caerphilly.gov.uk

Telephone: STD code: 01443 Number and extension: 864013

Authorities are required to calculate the council tax base for 2015-16 with reference to dwellings shown on the valuation list for the authority as at 31 October 2014 supplied to the authority under section 22B(7) of the Local Government Finance Act 1992. The figures should also take account of changes to the valuation list that appear likely to occur during 2015-16. The information requested on this return must be submitted to the Welsh Government under section 68 of the Local Government Finance Act 1992.

Please ensure that all blank cells are populated with zeros. It is a Welsh Government audit requirement that all cells are completed and copies signed. Where this is not the case forms will not be accepted. Please check the validation sheet before sending the form.

Forms should be returned to the address below, according to the following timetable:

- | | | |
|------|---------------------------------------|------------------------|
| (i) | certified signed copy and spreadsheet | 7 November 2014 |
| (ii) | final ratified taxbase | 2 January 2015 |

Gareth Brand
Local Government Financial Statistics Unit
Welsh Government
CP2
Cathays Park
Cardiff
CF10 3NQ

Queries on completion of the form or spreadsheet should be sent to:

E-mail: lgfs.transfer@wales.gsi.gov.uk
Telephone: **029 2082 3519**



Llywodraeth Cymru
Welsh Government

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Authority: Caerphilly County Borough Council

Part A: Chargeable dwellings	A*	Valuation band									Total (= sum of band figures)
		A	B	C	D	E	F	G	H	I	
A1. All chargeable dwellings (see note 1)		14,458	25,791	17,913	8,998	6,134	2,234	716	88	70	76,402
A2. Dwellings subject to disability reduction (included in line A1) (see note 2)		49	216	169	104	70	31	10	5	16	670
A3. Adjusted chargeable dwellings (taking into account disability reductions)	49	14,625	25,744	17,848	8,964	6,095	2,213	711	99	54	76,402

Part B: Adjusted chargeable dwellings (see note 4)

B1. Dwellings with no discount	22	6,924	16,038	11,932	6,565	5,012	1,899	607	71	43	49,113
B2. Dwellings with a 25% discount	26	7,695	9,679	5,892	2,386	1,071	307	98	11	7	27,172
B3. Dwellings with a 50% discount	1	6	27	24	13	12	7	6	17	4	117
B3a. Dwellings with a discount other than 25% or 50% (Part G line 11)	0	0	0	0	0	0	0	0	0	0	0
B4. Total adjusted chargeable dwellings (=B1+B2+B3+B3a=A3)	49	14,625	25,744	17,848	8,964	6,095	2,213	711	99	54	76,402
B5. Total variable discounts (=Part G line 12) (see note 11)	0	0	0	0	0	0	0	0	0	0	0
Validation check: B4 should equal A3 (failure = difference, pass =0)	0	0	0	0	0	0	0	0	0	0	0

Part C: Calculation of discounted chargeable dwellings

C1. not used

C2. Total discounted dwellings (=A3-(B2x0.25-B3x0.5)-B5) (see note 5)	42	12,698	23,311	16,363	8,361	5,821	2,133	684	88	50	
C3. Ratio to band D	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
C4. Band D equivalents (=C2xC3) (rounded to 2 decimal places)	23.33	8,465.50	18,130.58	14,544.89	8,361.00	7,114.86	3,080.64	1,139.17	175.50	117.25	61,152.72

(sum of individual bands - carry to E1)

Part D: Memorandum items

D1. Exempt dwellings Classes A to N and P to W (not included in sections A to C above) (see note 6)		601	770	439	178	101	45	28	1	6	2,169
D2. Exempt dwellings Class O (not included in sections A to C above) (see notes 6 and 7)		0	0	0	0	0	0	0	0	0	0

D3. All dwellings in class A prescribed under Section 12 (included in section B above) (see note 8)		0	0	0	0	0	0	0	0	0	0
---	--	---	---	---	---	---	---	---	---	---	---

D4. Discount for each dwelling in prescribed class A (enter percentage applied) (see note 9)	0%
--	----

D5. All dwellings in class B prescribed under Section 12 (included in section B above) (see note 8)		55	96	50	23	22	7	1	1	0	255
---	--	----	----	----	----	----	---	---	---	---	-----

D6. Discount for each dwelling in prescribed class B (enter percentage applied) (see note 9)	0%
--	----

D7. All dwellings in class C prescribed under Section 12 (included in section B above) (see note 8)		292	299	178	65	32	17	5	2	2	892
---	--	-----	-----	-----	----	----	----	---	---	---	-----

D8. Discount for each dwelling in prescribed class C (enter percentage applied) (see note 9)	0%
--	----

For Welsh Government Administration only	ASBBSJCPVAA
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Validation check: D4=0, or between 0% and 50%	OK
Validation check: D6=0, or between 0% and 50%	OK
Validation check: D8=0, or between 0% and 50%	OK

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Authority: Caerphilly County Borough Council

Part E: Calculation of council tax base

E1	Discounted chargeable dwellings: band D equivalents (=C4 total)	61,152.72
E2	Collection rate (please enter to 2 decimal places)	97.00 %
E3	= E1 x E2 (rounded to 2 decimal places)	59,318.14
E4	Class O exempt dwellings: band D equivalents (please enter to 2 decimal places) (see note 10)	0.00
E5	Council tax base for tax-setting purposes (=E3+E4)	59,318.14
E6	100% council tax base for calculating revenue support grant (=E1+E4)	61,152.72

Part F: Exempt dwellings by class of exemption

Class A	326	Class I	25	Class Q	10
Class B	0	Class J	5	Class R	0
Class C	936	Class K	1	Class S	12
Class D	6	Class L	32	Class T	13
Class E	114	Class M	0	Class U	298
Class F	281	Class N	69	Class V	0
Class G	10	Class O	0	Class W	25
Class H	6	Class P	0	Total all classes	2,169

(must match total of lines D1 and D2)

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Government
Administration only

BOADPCOANARAR

Validation check: OK

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Authority: Caerphilly County Borough Council

Part G : Variable discounts

	Area	Discount percentage applied	Properties / Discounts	Valuation band									Total	
				A*	A	B	C	D	E	F	G	H		I
G1	Enter the name of area 1*	0%	Number of properties	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G2			Discounts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G3	Enter the name of area 2*	0%	Number of properties	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G4			Discounts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G5	Enter the name of area 3*	0%	Number of properties	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G6			Discounts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G7	Enter the name of area 4*	0%	Number of properties	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G8			Discounts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G9	Enter the name of area 5*	0%	Number of properties	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G10			Discounts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G11			Total number of properties	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G12	Total discounts (G2+G4+G6+G8+G10) (see note 11)			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* this may be 'whole authority', a single community area or a number of community areas

CERTIFICATE OF CHIEF FINANCIAL OFFICER

I certify that the council tax base shown in sections A to E above has been calculated by my authority in accordance with the Local Authorities (Calculation of Council Tax Base) Regulations 1995 (Wales) (SI 1995/2561) as amended. Where indicated below, the figures have been approved, in accordance with section 67 of the Local Government Finance Act 1992, as amended by section 84 of the Local Government Act 2003.

Please tick the appropriate box

- The figures have not yet been approved;
- or
- the figures have been approved by executive decision;
- or
- the figures have been approved by the full council.

Chief Financial Officer:..... Date:.....

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	BOADPCOANARAR	
	AZAATCBABAABS	

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Validation checks - please insert comments where requested

Line A1					Tolerance		Comments
Band	2014-15	2015-16	Diff	% Diff	Abs	%	
A	14,454	14,458	4	0%	50	5%	OK
B	25,717	25,791	74	0%	50	5%	OK
C	17,818	17,913	95	1%	50	5%	OK
D	8,902	8,998	96	1%	50	5%	OK
E	6,128	6,134	6	0%	50	5%	OK
F	2,195	2,234	39	2%	50	5%	OK
G	710	716	6	1%	30	5%	OK
H	87	88	1	1%	20	5%	OK
I	71	70	-1	-1%	10	5%	OK
Total	76,082	76,402	320	0%	100	5%	OK

Line B1					Tolerance		Comments
Band	2014-15	2015-16	Diff	% Diff	Abs	%	
A*	28	22	-6	-21%	50	10%	OK
A	6,906	6,924	18	0%	100	15%	OK
B	15,887	16,038	151	1%	50	10%	OK
C	11,805	11,932	127	1%	50	10%	OK
D	6,505	6,565	60	1%	50	10%	OK
E	5,017	5,012	-5	0%	50	10%	OK
F	1,880	1,899	19	1%	50	10%	OK
G	597	607	10	2%	30	10%	OK
H	75	71	-4	-5%	20	10%	OK
I	43	43	0	0%	10	10%	OK
Total	48,743	49,113	370	1%	100	10%	OK

Line B2					Tolerance		Comments
Band	2014-15	2015-16	Diff	% Diff	Abs	%	
A*	24	26	2	8%	50	10%	OK
A	7,709	7,695	-14	0%	50	10%	OK
B	9,741	9,679	-62	-1%	50	10%	OK
C	5,930	5,892	-38	-1%	50	10%	OK
D	2,355	2,386	31	1%	50	10%	OK
E	1,057	1,071	14	1%	50	10%	OK
F	291	307	16	5%	50	10%	OK
G	100	98	-2	-2%	30	10%	OK
H	8	11	3	38%	20	10%	OK
I	7	7	0	0%	10	10%	OK
Total	27,222	27,172	-50	0%	200	10%	OK

Line B3					Tolerance		Comments
Band	2014-15	2015-16	Diff	% Diff	Abs	%	
A*	1	1	0	0%			Please comment Validation not set up correctly for this cell
A	5	6	1	20%	50	10%	OK
B	29	27	-2	-7%	50	10%	OK
C	18	24	6	33%	50	10%	OK
D	16	13	-3	-19%	50	10%	OK
E	14	12	-2	-14%	50	10%	OK
F	7	7	0	0%	50	10%	OK
G	5	6	1	20%	30	10%	OK
H	18	17	-1	-6%	20	10%	OK
I	4	4	0	0%	10	10%	OK
Total	117	117	0	0%	200	10%	OK

Line D1					Tolerance		Comments
Band	2014-15	2015-16	Diff	% Diff	Abs	%	
1A	589	601	12	2%	50	10%	OK
1B	777	770	-7	-1%	50	10%	OK
1C	438	439	1	0%	50	10%	OK
1D	204	178	-26	-13%	50	10%	OK
1E	115	101	-14	-12%	50	10%	OK
1F	48	45	-3	-6%	50	10%	OK
1G	26	28	2	8%	50	10%	OK
1H	2	1	-1	-50%	50	10%	OK
1I	5	6	1	20%	50	10%	OK
1 Total	2,204	2,169	-35	-2%	200	10%	OK

Line D2					Tolerance		Comments
Band	2014-15	2015-16	Diff	% Diff	Abs	%	
2A	0	0	0		50	10%	OK
2B	0	0	0		50	10%	OK
2C	0	0	0		50	10%	OK
2D	0	0	0		50	10%	OK
2E	0	0	0		50	10%	OK
2F	0	0	0		50	10%	OK
2G	0	0	0		50	10%	OK
2H	0	0	0		50	10%	OK
2I	0	0	0		50	10%	OK
2 Total	0	0	0		50	10%	OK

Line D3					Tolerance		Comments
Band	2014-15	2015-16	Diff	% Diff	Abs	%	
3A	0	0	0		50	10%	OK
3B	0	0	0		50	10%	OK
3C	0	0	0		50	10%	OK
3D	0	0	0		50	10%	OK

Validation checks - please insert comments where requested

3E	0	0	0	50	10%	OK	
3F	0	0	0	50	10%	OK	
3G	0	0	0	50	10%	OK	
3H	0	0	0	50	10%	OK	
3I	0	0	0	50	10%	OK	
3 Total	0	0	0	100	10%	OK	

Line D5					Tolerance			
	2014-15	2015-16	Diff	% Diff	Abs	%		Comments
5A	55	55	0	0%	100	75%	OK	
5B	91	96	5	5%	50	10%	OK	
5C	55	50	-5	-9%	50	10%	OK	
5D	19	23	4	21%	50	10%	OK	
5E	19	22	3	16%	50	10%	OK	
5F	6	7	1	17%	50	10%	OK	
5G	3	1	-2	-67%	50	10%	OK	
5H	1	1	0	0%	50	10%	OK	
5I	0	0	0	0%	50	10%	OK	
5 Total	249	255	6	2%	200	10%	OK	

Line D7					Tolerance			
	2014-15	2015-16	Diff	% Diff	Abs	%		Comments
7A	260	292	32	12%	50	10%	OK	
7B	300	299	-1	0%	50	10%	OK	
7C	148	178	30	20%	50	10%	OK	
7D	52	65	13	25%	50	10%	OK	
7E	30	32	2	7%	50	10%	OK	
7F	13	17	4	31%	50	10%	OK	
7G	10	5	-5	-50%	50	10%	OK	
7H	2	2	0	0%	50	10%	OK	
7I	3	2	-1	-33%	50	10%	OK	
7 Total	818	892	74	9%	50	10%	OK	

Lines 4A, 6A and 8A				Tolerance			
	2014-15	2015-16	Diff	%			Comments
4A*	0%	0%	0%	4%			OK
6A*	0%	0%	0%	49%			OK
8A*	0%	0%	0%	49%			OK

SECTION E					Tolerance			
	2014-15	2015-16	Diff	% Diff	Abs	%		Comments
E1	60,837	61,153	316	0.5%		0.3%	OK	
E2	97.00%	97.00%	0.00%			1.6%	OK	
E4	0	0	0		50	10%	OK	
E6	60,837	61,153	316	0.5%	50	2.0%	OK	

SECTION F					Tolerance			
	2014-15	2015-16	Diff	% Diff	Abs	%		Comments
A	295	326	31	11%	50	10%	OK	
B	0	0	0		50	10%	OK	
C	1,020	936	-84	-8%	50	10%	OK	
D	9	6	-3	-33%	50	10%	OK	
E	106	114	8	8%	50	10%	OK	
F	279	281	2	1%	50	10%	OK	
G	12	10	-2	-17%	50	10%	OK	
H	5	6	1	20%	50	10%	OK	
I	23	25	2	9%	50	10%	OK	
J	6	5	-1	-17%	50	10%	OK	
K	1	1	0	0%	50	10%	OK	
L	30	32	2	7%	50	10%	OK	
M	0	0	0		50	10%	OK	
N	72	69	-3	-4%	50	10%	OK	
O	0	0	0		50	10%	OK	
P	0	0	0		50	10%	OK	
Q	10	10	0	0%	50	10%	OK	
R	0	0	0		50	10%	OK	
S	17	12	-5	-29%	50	10%	OK	
T	15	13	-2	-13%	50	10%	OK	
U	280	298	18	6%	50	10%	OK	
V	0	0	0		50	10%	OK	
W	24	25	1	4%	50	10%	OK	
Total	2,204	2,169	-35	-2%	200	5%	OK	

Valuation Office Agency Check: 28/07/2013					Tolerance			
Band	VOA	A1+D1+D2	Diff	% Diff	Abs	%		Comments
A	15,030	15,059	29	0%	50	5%	OK	
B	26,480	26,561	81	0%	50	5%	OK	
C	18,230	18,352	122	1%	50	5%	OK	
D	9,100	9,176	76	1%	50	5%	OK	
E	6,130	6,235	105	2%	50	5%	OK	
F	2,210	2,279	69	3%	50	5%	OK	
G	740	744	4	1%	30	5%	OK	
H	90	89	-1	-1%	20	5%	OK	
I	70	76	6	9%	10	5%	OK	
Total	78,080	78,571	491	1%	50	5%	OK	

Council Tax Dwellings (CT1) 2015-16 Notes for Guidance

This form seeks information from county and county borough councils about their council tax base for 2015-16. This should be calculated with reference to dwellings shown on the draft 2014 valuation list for the authority as at 31 October 2014 compiled by the authority under section 22B(7) of the Local Government Finance Act 1992, as inserted by the Local Government Act 2003, but the figures should also take account of changes to the valuation list that appear likely to occur during 2015-16.

The calculations and figures supplied by authorities on this form should be in accordance with the Local Government Finance Act 1992 and the Local Authorities (Calculation of Council Tax Base) (Wales) Regulations 1995 (SI 1995/2561 as amended by SI 1999/2935 and the Local Authorities (Calculation of Council Tax Base) and Council Tax (Prescribed Classes of Dwellings) (Wales) (Amendment) Regulations 2004). The information is required by the Welsh Government under its powers in section 68 of the Local Government Finance Act 1992.

Line Notes

Note	Line	
1	A1	This is not the number of dwellings in each band shown on the valuation list, because that includes dwellings that are exempt from the council tax. The information required is the total number of chargeable dwellings in each band as derived with reference to the information supplied from the valuation list and taking account of dwellings that appear likely to be on the valuation list for all or part of 2015-16.
2	A2	Dwellings subject to a disability reduction are those set out in the Council Tax (Reductions for Disabilities) Regulations 1992 (SI 1992/554 as amended by SI 1993/195 and SI 1999/1004).
3	A3	<p>A dwelling in bands B to I which is subject to a disability reduction receives a reduction of one band for the purposes of calculating the council tax payable. From 1 April 2000, a ratio of 5/9 to a band D dwelling is to be applied to dwellings listed in band A which are subject to a disability reduction. To record these band A disability reductions, a notional valuation band of A* has been included on the form. Line A3 which is the adjustment of line A1 taking into account all disability reductions is thus dependent on the council tax band and should be calculated as follows.</p> <p>A3A* = A2A A3A = A1A - A2A + A2B A3B = A1B - A2B + A2C A3C = A1C - A2C + A2D A3D = A1D - A2D + A2E A3E = A1E - A2E + A2F A3F = A1F - A2F + A2G A3G = A1G - A2G + A2H A3H = A1H - A2H + A2I A3I = A1I - A2I</p> <p>where:</p> <p>A3A* is the number of band A dwellings in line A3 with a disability reduction (i.e. column A* of line A3), A3A is the number of band A dwellings in line A3 (i.e. column A of line A3), A3B is the number of band B dwellings in line A3 (i.e. column B of line A3), and so on.</p>
4	B1 to B4	<p>The figures in this section are a breakdown of the adjusted chargeable dwellings shown in line A3.</p> <p>This section asks for the number of dwellings receiving either no discount, a 25% discount, a 50% discount or variable discounts. Only dwellings eligible for the statutorily-required discount at whatever level should be recorded. Discounts given under section 13A of the 1992 Act as inserted by section 76 of the 2003 Act (local discounts) should not be included under this section or any other section of this form (see note 13).</p>
	B5	The figures shown in B5 are brought forward from line G12 in Part G.
5	C2	<p>The total discounted dwellings is calculated by deducting from the adjusted chargeable dwellings (A3):</p> <ul style="list-style-type: none"> - the number of dwellings with a 25% discount (B2) times 0.25 and - the number of dwellings with a 50% discount (B3) times 0.50 and - the total variable discounts (B5)

6	D1	Dwellings are exempt from the council tax if they fall within one of the classes prescribed in the Council Tax (Exempt Dwellings) Order 1992 (SI 1992/558, as amended by SI 1992/2941, SI 1993/150, SI 1994/539, SI 1995/619, SI 1997/74, SI 1997/656, SI 1998/291, SI 1999/536 and SI 2000/1025). Information on dwellings by class of exemption is requested
7	D2	Class O exempt dwellings need to be separately identified because of contributions in lieu of council tax (see note 10).
8	D3, D5 and D7	<p>The classes of dwellings prescribed under the new section 12 of the 1992 Act as inserted by section 75 of the 2003 Act. The Council Tax (Prescribed Classes of Dwellings) (Wales) Regulations 1998 (SI 1998/105) as inserted by SI 2004/452 prescribe three classes of dwellings (A, B and C) in respect of which authorities have discretion about the level of discount given. They will therefore have been included in Part B of this form. These lines should show the number of dwellings that are believed to be in each prescribed class in each band. Dwellings in notional band A* cannot fall in one of the prescribed classes because they will have at least one resident in order to qualify for a disability reduction.</p> <p>Please note that class A represents properties where a restriction applies to occupation (no continuous occupation for 28 or more days is allowed) whereas class B represents properties where no such restriction applies. Class C represents unoccupied substantially unfurnished dwellings (long term empty).</p>
9	D4, D6 and D8	The discount percentage awarded to each of the prescribed classes of dwelling (see note 8) should be shown in box D4, D6 and D8.
10	E4	This figure is the amount calculated by the billing authority under regulation 3(4) of the 1995 regulations. It represents the authority's estimate of the amount (if any) that is likely to be paid to the authority by the Secretary of State for Defence in respect of dwellings that fall within Class O of SI 1992/558. Contributions from the Secretary of State will be at the rate of 100 per cent of the council tax for dwellings which have residents and 50 per cent for those which do not. The amount must be expressed here in terms of Band D equivalent dwellings.
11	F	See also note 6 covering lines D1 and D2. Annex A gives an extensive list of exempt classes.
12	G1 to G12	The new Section 12(4) of the 1992 Act, as inserted by section 75 of the 2003 Act, enables billing authorities to vary the level of discount given to prescribed dwellings for all or part of the authority area. Lines 1 to 12 of part G of this form calculates the total whole dwelling equivalent discount for each band. This total is then carried forward to line B5 in order to calculate the total number of discounted dwellings. This section allows for 5 different levels of discount. If this is not sufficient please inform the Welsh Government at the address on the front of the form and an amended form will be
13		The CT1 form should not take account of any locally-funded discounts or exemptions made by billing authorities under section 13A of the Local Government Finance Act 1992, as inserted by section 76 of the Local Government Act 2003. This is because any decrease in the RSG taxbase made as a result of such discounts or exemptions would lead to an increase in entitlement to RSG and hence to the discounts being funded by central rather than local government.



CABINET - 10TH DECEMBER 2014

SUBJECT: WRITE-OFF OF DEBTS OVER £20,000 – NNDR ARREARS FOR LTD COMPANIES

REPORT BY: ACTING DIRECTOR OF CORPORATE SERVICES AND S151 OFFICER

1. PURPOSE OF REPORT

1.1 On 15th September 2009, Cabinet approved a revised write-off procedure for debts that are material, where the individual debt is greater than £20,000. Approval is sought to write-off three national non-domestic rate (NNDR), also known as business rate, debts where, in each case, the individual debt is greater than £20,000.

2. SUMMARY

2.1 This report gives details of an amount of business rate that the Authority is required to write off as a bad debt.

3. LINKS TO STRATEGY

3.1 To comply with Financial Regulations.

4. THE REPORT

4.1 Policy & Resources Scrutiny Committee receives half yearly reports on monies due to the Council which cannot be collected. Unpaid business rate is pursued through a magistrates' court liability order that empowers the Authority to instruct bailiffs.

4.2 Due to debtors absconding, declaring themselves insolvent through bankruptcy/liquidation or other proceedings, ceasing to trade, dying with no estate, and because of limited means there are inevitably circumstances when debts cannot be collected. After all legal means have been exhausted a decision is made to write-off debts. Policy and Resources Scrutiny Committee receive a report every 6 months summarising the value of debts written off by the Authority

4.3 This case involves Tyne Investment Two LLP, a company that was the mortgagor of five separate rating assessments at De Clare House, Sir Alfred Owen Way, Pontywindy Industrial Estate, Caerphilly. The unpaid rates of £21,427.89, covering the period 1st April 2013 to 11th November 2013 inclusive, are in respect of unoccupied rate liability for five rating assessments set out below:

Reference Number	First Line of Address	Unpaid Business Rate (£)
510246998	1 st floor suite 1	7,617.22
510322074	1 st floor suite 2b	1,566.16

51032201X	1 st floor suite 5	3,559.45
510322109	Unit E	5,267.99
510322047	Unit C	3,417.07
	TOTAL UNPAID	21,427.89

Another company was initially held liable for this period and business rate demands were issued in November 2013, followed by statutory reminder notices in January 2014. When magistrates' court summonses were issued in April 2014, the company provided a legal document to show that Tyne Investment Two LLP should be held liable as the offices within De Clare House were an asset of Tyne Investments Two LLP; this company was therefore billed retrospectively. Unfortunately, Tyne Investment Two LLP went into receivership on 11th November 2013 and so the Authority has submitted a claim for the outstanding debts to the relevant insolvency practitioner. However, as business rate is an unsecured debt, it is very unlikely that the Authority will receive any payment as a result of the insolvency proceedings.

4.4 In this case, the Authority has no further legal powers to recover the unpaid debts.

5. FINANCIAL IMPLICATIONS

5.1 There are no direct financial implications to the Authority as the Authority collects NNDR on behalf of Welsh Government.

6. EQUALITIES IMPLICATIONS

6.1 There are no potential equalities implications of this report and its recommendations on groups or individuals who fall under the categories identified in Section 6 of the Council's Strategic Equality Plan, therefore no Equalities Impact Assessment has been carried out.

7. PERSONNEL IMPLICATIONS

7.1 There are none.

8. CONSULTATIONS

8.1 There are no consultation responses, which have not been reflected in this report.

9. RECOMMENDATIONS

9.1 It is recommended that Cabinet determine the debts detailed in paragraph 4.3 be written-off on the grounds that they are irrecoverable.

10. REASONS FOR THE RECOMMENDATIONS

10.1 To write-off bad debts due to the Authority where no further legal remedy exists.

11. STATUTORY POWER

11.1 Local Government Act 1972 and 2000.

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Consultees: Cllr Barbara Jones, Deputy Leader & Cabinet Member for Corporate Services
Nicole Scammell, Acting Director of Corporate Services & Section 151 Officer
Stephen Harris, Interim Head of Corporate Finance
Gail Williams, Interim Head of Legal Services & Monitoring Officer

Background Papers:
Contact Council Tax & NNDR Manager (ext 3421)

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CABINET – 10TH DECEMBER 2014

PUBLIC INTEREST TEST – EXEMPTION FROM DISCLOSURE OF DOCUMENTS SCHEDULE 12A LOCAL GOVERNMENT ACT 1972

SUBJECT: WRITE OFF OF DEBTS OVER £20,000 – NNDR ARREARS

REPORT BY: ACTING DIRECTOR OF CORPORATE SERVICES

I have considered grounds for exemption of information contained in the report referred to above and make the following recommendations to the Proper Officer:-

EXEMPTIONS APPLYING TO THE REPORT:

Information relating to a particular individual (paragraph 12). Information relating to the financial or business affairs of any particular person (including the Authority holding that information) (Paragraph 14).

FACTORS IN FAVOUR OF DISCLOSURE:

There is a public interest in the way in which the Council recovers monies owed.

PREJUDICE WHICH WOULD RESULT IF THE INFORMATION WERE DISCLOSED:

The report contains detailed information about the financial affairs of various debtors, disclosure of such information would be in contravention of the principles of the Data Protection Act 1998.

MY VIEW ON THE PUBLIC INTEREST TEST IS AS FOLLOWS:

That paragraph 12 and 14 should apply. I am mindful of the need to ensure the transparency and accountability of public authorities for decisions taken by them in relation to the recovery of monies owed to them. However disclosure of the information contained in the report would be in contravention of the Data Protection Act 1998.

The information is not affected by any other statutory provision which requires the information to be publicly registered.

On that basis I feel that the public interest in maintaining the exemption outweighs the public interest in disclosing the information. Members are asked to consider these factors when determining the public interest test, which they must decide when considering excluding the public from this part of the meeting.

RECOMMENDED DECISION ON EXEMPTION FROM DISCLOSURE:

On the basis set out above I feel that the public interest in maintaining the exemption outweighs the public interest in disclosing the information, and that the report should be exempt.

Signed:



Dated: 2nd December, 2014

Post: **Interim Head of Legal Services/Monitoring Officer**

I accept the recommendation made above.

Signed:



Proper Officer

Date:

2/12/14

By virtue of paragraph(s) 12, 14 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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