



City and County of Swansea

Notice of Meeting

You are invited to attend a Meeting of the

Cabinet

At: Council Chamber, Guildhall, Swansea

On: Thursday, 21 March 2019

Time: 10.00 am

Chair: Councillor Rob Stewart

Membership:

Councillors: M C Child, W Evans, R Francis-Davies, D H Hopkins, A S Lewis, C E Lloyd, J A Raynor, M Sherwood and M Thomas

Also Invited: J E Burtonshaw & E J King

The use of Welsh is welcomed. If you wish to use Welsh please inform us by noon on the working day before the meeting.

Agenda

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1. **Apologies for Absence.**
2. **Disclosures of Personal and Prejudicial Interests.**
www.swansea.gov.uk/disclosuresofinterests
3. **Minutes.** 1 - 6
To approve & sign the Minutes of the previous meeting(s) as a correct record.
4. **Announcements of the Leader of the Council.**
5. **Public Question Time.**
Questions must relate to matters on the open part of the Agenda of the meeting and will be dealt with in a 10 minute period.
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Next Meeting: Thursday, 18 April 2019 at 10.00 am



Huw Evans
Head of Democratic Services
Wednesday, 13 March 2019

Contact: Democratic Services - Tel: (01792) 636923

Agenda Item 3.



City and County of Swansea

Minutes of the **Cabinet**

Council Chamber, Guildhall, Swansea

Thursday, 14 February 2019 at 10.00 am

Present: Councillor R C Stewart (Chair) Presided

Councillor(s)

M C Child
C E Lloyd

Councillor(s)

E J King
J A Raynor

Councillor(s)

A S Lewis
M Thomas

Apologies for Absence

Councillor(s): J E Burtonshaw, R Francis-Davies and D H Hopkins

Also Present: Councillors(s) C Anderson, P M Black, W Evans, T J Hennegan, C A Holley, P Lloyd & M Sherwood

141. Disclosures of Personal and Prejudicial Interests.

In accordance with the Code of Conduct adopted by the City and County of Swansea, the following interests were declared:

- 1) Councillor E J King declared a Personal and Prejudicial Interest in Minute 148 "Medium Term Financial Planning 2020/21 - 2022/23" and Minute 149 "Revenue Budget 2019-2020" and stated that he had dispensation from the Standards Committee to Stay, Speak (but not in relation to his husband's employment) but not Vote when considering the Authority's budget.

142. Minutes.

Resolved that the Minutes of the meeting(s) listed below be approved and signed as a correct record:

- 1) Cabinet held on 17 January 2019.

143. Announcements of the Leader of the Council.

1) Webcasting of Council Meeting

The Leader of the Council stated that as part of the ongoing works to enable Webcasting of Council, Cabinet, Planning Committee and the Scrutiny Programme Committee; this Meeting is being recorded for Webcasting purposes. The meeting will not be streamed live as we are still in the testing period; however it will be recorded. If the trial is successful, the meeting will be published online at a later date as a Podcast.

144. Public Question Time.

A number of questions were asked by Members of the Public relating to the budget. The relevant Cabinet Member responded accordingly. No questions required a written response.

145. Councillors' Question Time.

A number of questions were asked by Councillors relating to the budget. The relevant Cabinet Member responded accordingly. No questions required a written response.

146. Pre-decision Scrutiny Feedback on the Annual Budget. (Verbal)

Councillor C A Holley, presented the pre decision scrutiny feedback.

147. Revenue and Capital Budget Monitoring 3rd Quarter 2018/19. *

Call In Procedure - Subject to Pre-Decision Scrutiny: This decision is exempt from the Authority's Call In Procedure as "the decision has been subject to Pre-Decision Scrutiny and there is no material change in relevant information / evidence".

The Cabinet Member for Business Transformation & Performance submitted a report which outlined the financial monitoring of the 2018-2019 revenue and capital budgets, including the delivery of budget savings.

Resolved that:

- 1) The comments and variations in the report, and the actions in hand to address them be noted.

148. Medium Term Financial Planning 2020/21 – 2022/23. *

Call In Procedure - Subject to Pre-Decision Scrutiny: This decision is exempt from the Authority's Call In Procedure as "the decision has been subject to Pre-Decision Scrutiny and there is no material change in relevant information / evidence".

The Section 151 Officer submitted a report which set out the rationale and purpose of the Medium Term Financial Plan and detailed the major funding assumptions for the period and proposed a strategy to maintain a balanced budget.

Resolved that:

- 1) The Medium Term Financial Plan 2020-2021 to 2022-2023 be recommended to Council as the basis for future service financial planning.

149. Revenue Budget 2019/20. *

Call In Procedure - Subject to Pre-Decision Scrutiny: *This decision is exempt from the Authority's Call In Procedure as "the decision has been subject to Pre-Decision Scrutiny and there is no material change in relevant information / evidence".*

The Section 151 Officer submitted a report which set out the current position with regard to the Revenue Budget for 2019-2020. It detailed:

- Financial Monitoring 2018-2019;
- The Local Government Finance Settlement 2019-2020;
- Budget Forecast 2019-2020;
- Specific Saving Proposals;
- Outcome of Budget Consultation;
- Staffing Implications;
- Reserves and Contingency Fund Requirements;
- The Budget Requirement and Council Tax 2019-2020;
- Summary of funding proposals;
- Risks and uncertainties.

The Leader of the Council, Business Transformation & Performance Cabinet Member and the Environment & Infrastructure Management Cabinet Member proposed the following amendments.

	£	£
Further changes to proposals as a result of consultation responses		
Remove - Library Community Service	67,000	
Remove - Professional Fees	49,000	
Remove - Charging for Free Car Parks	23,000	
	<u>139,000</u>	
Funded as follows:		
Reduction in Mid & West Wales Fire & Rescue Service Precept	-60,000	
Reduce contingency fund by £79k to £7.072M		79,000

Resolved that:

- 1) The outcome of the formal consultation exercise be noted and changes to the Budget Proposals in Appendix D of the report as amended above be agreed, together with the position regarding delegated budgets as set out in Section 4.10 and 4.11 of the report;
- 2) The current Resource Gap identified in Section 4.5 of the report be noted, and in line with the potential actions identified in Sections 9 and 10 of the report

agreed a course of action to achieve a balanced Revenue Budget for 2019-2020;

- 3) In addition to a review of current savings proposals Cabinet will need to:
 - a) Review and Approve the Reserve Transfers recommended in the report;
 - b) Agree a level of Council Tax for 2019-2020 to be recommended to Council.
- 4) Subject to the changes identified and listed above, Cabinet recommends to Council for approval:
 - a) A Revenue Budget for 2019-2020;
 - b) A Budget Requirement and Council Tax levy for 2019-2020.

150. Housing Revenue Account (HRA) – Revenue Budget 2019/20. *

Call In Procedure - Subject to Pre-Decision Scrutiny: *This decision is exempt from the Authority's Call In Procedure as "the decision has been subject to Pre-Decision Scrutiny and there is no material change in relevant information / evidence".*

The Section 151 Officer submitted a report which proposed a Revenue Budget for 2019-2020 and a rent increase for properties within the Housing Revenue Account (HRA).

Resolved that the following budget proposals be recommended to Council for approval:

- 1) Rents be increased in line with the Welsh Government interim policy as detailed in Section 3 of the report;
- 2) Fees, charges and allowances be approved as outlined in Section 3 of the report;
- 3) The Revenue Budget Proposals as detailed in Section 3 of the report.

151. Housing Revenue Account (HRA) – Capital Budget and Programme 2018/19 – 2022/23. *

Call In Procedure - Subject to Pre-Decision Scrutiny: *This decision is exempt from the Authority's Call In Procedure as "the decision has been subject to Pre-Decision Scrutiny and there is no material change in relevant information / evidence".*

The Section 151 Officer submitted a report which proposed a revised Capital Budget for 2018-2019 and a Capital Budget for 2019-2020 – 2022-2023.

Resolved that the following be recommended to Council for approval:

- 1) The transfers between schemes and the revised budgets for schemes in 2018-2019 be approved;
- 2) The budget proposals for 2019-2020 – 20202-2023 be approved;
- 3) Where individual schemes as shown in Appendix B are programmed over the 4 year period described in the report, then these be committed and approved and their financial implications for funding over subsequent years also be approved.

152. Capital Budget & Programme 2018/19- 2023/25. *

Call In Procedure - Subject to Pre-Decision Scrutiny: *This decision is exempt from the Authority's Call In Procedure as "the decision has been subject to Pre-Decision Scrutiny and there is no material change in relevant information / evidence".*

The Section 151 Officer submitted a report which proposed a revised Capital Budget for 2018-2019 and a Capital Budget for 2019-2020 to 2022-2023 (2023-2025 for Band B Schools).

Resolved that:

- 1) The revised Capital Budget for 2018-2019 and a Capital Budget for 2019-2020 – 2023-2025 as detailed in Appendices A, B, C, D, E and F of the report be approved.

153. The Capital Strategy 2018/19 - 2023/24. *

Call In Procedure - Subject to Pre-Decision Scrutiny: *This decision is exempt from the Authority's Call In Procedure as "the decision has been subject to Pre-Decision Scrutiny and there is no material change in relevant information / evidence".*

The Section 151 Officer submitted a report which sought approval of the Capital Strategy which informs the 4 year Capital Programme.

Resolved that:

- 1) The Capital Strategy be approved.

154. Council Tax Premiums in Wales. *

Call In Procedure - Subject to Pre-Decision Scrutiny: *This decision is exempt from the Authority's Call In Procedure as "the decision has been subject to Pre-Decision Scrutiny and there is no material change in relevant information / evidence".*

The Chief Finance Officer (Section 151 Officer) submitted a report which provided information and sought consideration of whether to continue to allow 50% Council Tax discounts on unoccupied and unfurnished properties after any statutory period of exemption expires.

Resolved that:

- 1) The details of the discretionary powers relating to Council Tax premiums, discretionary discounts for unoccupied and unfurnished dwellings and the related issues outlined in this report be noted;
- 2) A consultation exercise be undertaken in respect of the following:
 - i) Whether to cease to allow a 50% Council Tax discount on dwellings that remain unoccupied and unfurnished after any statutory period of exemption has expired;
 - ii) Whether to charge a Council Tax Premium of up to 100% for dwellings that have been unoccupied and unfurnished for more than 12 months (long term empty properties);
 - iii) Whether to charge a Council Tax Premium of up to 100% for dwellings occupied periodically, commonly referred to as "second homes".

The meeting ended at 11.18 am

Chair

Call In Procedure – Relevant Dates	
Minutes Published:	08 March 2019
Call In Period Expires (3 Clear Working Days after Publication):	-
Decision Comes into force:	14 February 2019

Agenda Item 7.



Report of the Natural Environment Scrutiny Inquiry Panel

Cabinet – 21 March 2019

Scrutiny Inquiry into the Natural Environment

Purpose:	This report presents the findings, conclusions and recommendations resulting from the Panel's Inquiry into the Natural Environment. The Cabinet is required to consider the recommendations and agree action.
Policy Framework:	Council Constitution.
Consultation:	Legal, Finance, Equalities
Recommendation(s):	It is recommended that: 1) Cabinet receives the report and tasks the relevant Cabinet Member to report back to a Cabinet meeting with a written response to the scrutiny recommendations and proposed action(s) for Cabinet decision.
Report Authors:	Councillor Peter Jones & Bethan Hopkins
Finance Officer:	Paul Cridland
Legal Officer:	Tracey Meredith
Access to Services Officer:	Catherine Window

1.0 Introduction

- 1.1 This report presents the findings, conclusions and recommendations resulting from the scrutiny inquiry into the Natural Environment. The Scrutiny Panel's final report, appended, requires a Cabinet decision.
- 1.2 In accordance with the Council Constitution reports from scrutiny to the Executive are presented to the first available Cabinet meeting. The convener of the Panel will present the report and accompanying recommendations.

2.0 Scrutiny Programme Committee

2.1 The Scrutiny Programme Committee on 11 February 2019 discussed and agreed the report for submission to Cabinet.

3.0 Cabinet Decision

3.1 At this meeting Cabinet are being asked to receive the report and task the relevant Cabinet Member to prepare a written response on behalf of Cabinet. The Cabinet Member's response report should be scheduled for a future Cabinet meeting **no later than two months** following formal receipt of the scrutiny report*.

3.2 In their response report the Cabinet Member should recommend approval or rejection of each of the scrutiny recommendations together with an explanation. Within their report the Cabinet Member should also provide a proposed action plan to show what steps are being or will be taken to implement recommendations. Cabinet will then make a decision on the Cabinet Member's response report.

4.0 Follow Up

4.1 The Panel will schedule a follow up on progress with the implementation of the action plan agreed by Cabinet and impact of the scrutiny inquiry, and report their views to the Scrutiny Programme Committee. The panel convener and the Scrutiny Officer will ensure that a review of progress against accepted recommendations is scheduled into future work programmes. Usually a progress report will be requested by the Panel within 6-12 months after the action plan has been agreed by Cabinet.

5.0 Equality and Engagement Implications

5.1 Equality and engagement issues were formally considered at the scoping stage of this inquiry and borne in mind by the panel throughout evidence gathering. The Cabinet Member will need to ensure that implications are considered via application of the corporate Equality Impact Assessment process when considering the response to the recommendations.

6.0 Legal Implications

6.1 There are no specific legal implications at this stage.

7.0 Financial Implications

7.1 There are no financial implications to this report. Any potential implications will be outlined in the Cabinet response.

Background Papers: None.

Appendices: Appendix A – Final Inquiry Report.

What should Swansea Council do to maintain and enhance its natural environment and biodiversity, and, in so doing, promote the resilience of eco-systems?



Natural Environment Scrutiny Inquiry Panel
City and County of Swansea - Dinas a Sir Abertawe



January 2019

Why This Matters by Councillor Peter Jones (Convener)



‘There should be environment in every policy and every policy in environment’ (WLGA Neville Rookes)

When I was elected – to my surprise – in May 2017, I came onto the Council with one overriding ambition: to facilitate and encourage delivery of the biodiversity and eco-system duties and responsibilities for public bodies as set out in the Welsh Government’s Well-being of Future Generations Act 2015 and Environment (Wales) Act 2016. Before retiring in August 2016, I had previously worked for more than fourteen years as Sustainable Development Officer for RSPB Cymru, latterly involved from 2013 to 2015 with helping to draft what became the Well-Being of Future Generations Act, notably the well-being goal for A Resilient Wales. I also contributed to the thinking behind the Environment (Wales) Act.

I was pleased when the Scrutiny Programme Committee agreed to my suggestion for an Inquiry into ‘what should the Council be doing to maintain and enhance its natural environment and biodiversity and, in so doing, promote the resilience of eco-systems’. I realised from the outset that this would be an extensive undertaking, touching on all areas of the Council’s work – the aim was nothing less than to give to the natural environment and biodiversity the same level of importance and priority already accorded to the economy, welfare, housing, education and so on – a cultural revolution, no less.

Early on, the Inquiry Panel identified as a key priority that biodiversity and the environment should be written into the Council’s Corporate Plan as a sixth well-being objective, and this would have been the Panel’s principal recommendation. However, and much to our delight, this key recommendation was pre-empted by the Council in October 2018 adopting just such an objective, ie ‘Maintaining and enhancing Swansea’s Natural Resources and Biodiversity’; I believe that the work of the Inquiry contributed to its adoption. This, of course, built upon the ‘Working with Nature’ challenge set out in the Public Services Board Local Well-being Plan.

We understand that we are now one of the leading public authorities in Wales in thinking through and exploring how best to deliver on the Welsh Government environmental and sustainability legislation, evidenced by the then Environment Minister choosing Swansea Council as her first port of call in November 2018 to learn about what we are doing. Our task now, of course, is to meet with her expectations and to deliver on and embed the requirements of the legislation, and that is what this report, with its conclusions and recommendations, seeks to do. However, the Panel is clear that delivery will be difficult without financial support to meet, in particular, additional staffing requirements.

We live in dangerous and difficult times; to quote from David Attenborough’s recent statement to the December UN climate change conference in Poland ‘If we don’t take action, the collapse of our civilisations and the extinction of much of the natural world is on the horizon’. This is as much true for Swansea as for the rest of the planet, so we must act and do what we can – this report is a contribution. To recall the slogan from many years ago of Friends of the Earth – ‘Think global, act local’. Biodiversity

loss, habitat degradation and climate change impacts are the most serious challenges facing our species, and we must rise above our preoccupations with short-term considerations to address the potentially catastrophic future facing the planet and our children and grandchildren, who will have to live with the consequences of any failure on our part to do now what we know needs to be done.

Biodiversity and the natural environment are of innate importance – we alone as a species have the capacity to drive other species to extinction – but it is also the case that we depend upon the natural world for everything. Agriculture and food production are of fundamental importance, but so too are air and water quality and local flood risk management – the planting of trees and other vegetation plays a key role in this regard; moreover, the sowing of native wild flowers supports bees and other flying insects, so necessary to plant pollination and reproduction. Green infrastructure is rightly recognised by the Council as a necessary part of city centre redevelopment.

This report concentrates on biodiversity loss and how we, as a Council, can and must set about halting and reversing this process, not least to meet the 2020 target set by the Welsh Government which aims to halt the loss of biodiversity and take steps toward recovery. Early on, we decided with regret that we could not adequately address the issue of climate change within the scope of this inquiry, albeit that this process impacts as much upon wildlife as it does upon our species. However, we should not lose sight of this overriding challenge – I commend the work on renewable sources of zero-carbon energy for Swansea being undertaken by the Council but, of course, as we all know, much more needs to be done.

I would like in conclusion to say that the cross party Panel has worked extremely well, and I would like to pay tribute to the ideas and contributions of all members. I would also, of course, pay tribute to and thank both the Council Officers who met with the Panel and responded to its, often, difficult questioning, and to the many representatives of outside ‘green’ and voluntary bodies who attended our meetings and gave evidence. I would especially wish to thank Deb Hill, Team Leader of the Council’s Nature Conservation Team, who was unstinting in her help and advice to the Panel; and to Bethan Hopkins, the Scrutiny Officer responsible for supporting the Inquiry, and for all her enthusiastic hard work, good advice, initiatives and ideas.

There’s much work to be done – let’s get on and do it!

Summary of Conclusions and Recommendations

Below is a summary of conclusions and recommendations which the Panel reached. Detail can be found in the body of the report.

What should Swansea Council do to maintain and enhance its natural environment and biodiversity, and, in so doing, promote the resilience of eco-systems?

Conclusions

1. Create an environmental corporate priority to embed biodiversity in business and strategic planning to meet requirements.
2. Raise the profile of the Natural Environment and Biodiversity internally and externally.
3. Maintain and increase the specialist and high quality work which is currently delivered.
4. Recognise the benefits of 'nature based' prevention projects, such as to limit air pollution and for flood risk management etc.
5. The need for and costs of providing additional resources to maintain the natural environment should be recognised and shared throughout services
6. The authority should work co-productively with external partners on a strategic scale.
7. Recognise, encourage, maintain and expand commitment from voluntary groups, Community Councils and the public in maintaining and enhancing the Council's green spaces.
8. There should be more cross departmental working, with the shared aim of maintaining and enhancing the natural environment and biodiversity, together with their eco-system benefits.
9. There needs to be a commitment to natural environment education in schools.

Recommendations

1. Development and implementation of a Corporate Biodiversity Action Plan.
2. Ensure the Action Plan links with other relevant cross organisational policies at a strategic level, for example, the Local Well-being Plan and Area Statements.
3. Develop a clear and enthusiastic vision and message for maintaining and enhancing biodiversity to ensure a consistent 'buy-in' from each service.
4. Embed the new corporate priority by developing and delivering relevant training.
5. Make information available to the public to encourage participation and understanding, including continuing to develop the Natural Environment web pages.
6. Complete and publicise the ward mapping exercise. This would provide each ward and the Councillor Representatives with information specific to that ward. It would include information about important species, protected sites and other relevant ecological information as well as potential opportunities for improving biodiversity within the ward.
7. Recognise, encourage, maintain and expand commitment from voluntary groups, Community Councils and the public in maintaining and enhancing the Council's green spaces.
8. Insert a relevant biodiversity clause into service level agreements, licences etc which relates to land use and land management and ensure that the importance of these clauses is made clear to the land managers and the implications of not meeting them are highlighted.
9. Assess the verges in Swansea that can stop being mowed and sprayed. Give these over to nature and allow for self-seeding, which will encourage native plants and pollinator species.
10. Where appropriate, plant native wildflowers and trees. Non-native species do not benefit pollinators to the same extent as native species.
11. Encourage green projects for well-being such as gardening projects, outdoor green-space activities and volunteering opportunities for adults and children across all relevant services.
12. Employ a Section 6 Officer to co-ordinate, support and promote the consideration and delivery of a range of environmental projects across Swansea and also ensure the Council are meeting the requirements of the Environment Act (Section 6).
13. Employ an additional Planning Ecologist/Ecological Enforcement Officer to work with Council services with a specific duty to help ensure the environmental conditions and section 106 obligations on planning consents are met, whilst also

contributing to maintaining biodiversity, and meeting the requirements of the new Sustainable Drainage System legislation.

14. Share natural environment and biodiversity costs across services.
15. Renew the South East Wales Biodiversity Records Centre (SEWBRc) service level agreement for 2019/20 (with a plan in place to achieve this in subsequent years)
16. Continue to nurture good working relationships with external agencies and encourage other services to do the same.
17. Invite environmental voluntary group and Community Council representatives to regular liaison meetings e.g. Friends of parks and wildlife sites. This would allow them some support and access to some specialist advice from relevant officers.
18. Create environmental link Governors on school governing bodies who can take relevant information and projects to their school.
19. Encourage better use of school grounds and local wildlife sites for biodiversity.
20. Employ a dedicated outdoor learning officer who can provide the tailored support, training and delivery that will enable Swansea schools to fully realise the potential of outdoor learning, to deliver educational and wellbeing benefits, from the varied natural resources which Swansea possesses.

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1. **WHY WE PRODUCED THIS REPORT**

Overview

- 1.1 In examining this topic and producing this report we acknowledge the current work that is being undertaken by Swansea Council to maintain and enhance the natural environment and biodiversity whilst, of course, seeking to identify potential areas for improvement. There are two major pieces of recent legislation: the Environment (Wales) Act 2016 and the Well-being of Future Generations (Wales) Act 2015. These impose duties and responsibilities on all public bodies to protect and enhance the resilience of ecosystems, and to consider this in all Council activities and projects from their earliest planning and design stages.

Selecting the topic

- 1.2 The topic was chosen for scrutiny because the recent legislation requires adoption and delivery of the biodiversity and eco-system duties by all Welsh public authorities, and there is an appetite in Swansea to ensure that its substantial natural resources are protected and enriched for both the current and future populations of the city.

It is also important to recognise that Swansea is going through a period of substantial change. Major development and regeneration projects in the City Centre, in particular, will see the biggest infrastructure shift in 70 years. This gives us a once in a lifetime opportunity to place green infrastructure at the heart of the development and make radical changes for the benefit of the environment and the people of Swansea.

Intended contribution

- 1.3 As a Panel we believe that we can make a valuable contribution to the sustainable management of the natural environment in Swansea. We recognise, however, that the challenges are deep seated and often complex. We also believe that, while no one has all of the answers, success will only come from a conversation that everyone is able to contribute to. It is in this spirit that our conclusions and recommendations are offered.

Specifically this report aims to contribute to this vital debate by:

- Drawing together some general principles for the maintenance and enhancement of the natural environment.
- Offering proposals for improvement in the short, medium and long term.
- Providing a Councillor perspective on how well services are working.
- Pointing to good practice examples.
- Sharing the views of different people involved in thinking about and working for the natural environment.

We are also happy to recognise the limitations of the Inquiry. Given the complexity of the topic and the time that we had, this report necessarily provides a broad view. We simply did not have the time to go into issues in more depth. Moreover, we have not addressed the challenge of climate change which, of

course, is already impacting significantly on wildlife, and Councils will need to do so with increasing intensity as we go forward.

Finally, many of our conclusions are in line with the Council’s current direction of travel and these are noted in order to provide reassurance. Others may be either additional or contrary to what has already been agreed. These are intended to offer challenge and to stimulate debate. Where we have made recommendations these are intended to help improve the work of the Council.

Equalities and Engagement

1.4 The Council is subject to the Public Sector Equality Duty (Wales) and must, in the exercise of its functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Our Equality Impact Assessment process ensures that we have paid due regard to the above.

When planning this Inquiry, we considered which groups might be particularly affected and how we might engage with them. As a result, we published a blog and survey asking for feedback and ensured that this was available in alternative formats; this was sent to forums that represent people with protected characteristics.

Use of key words and phrases

1.5 For clarity and benefit of the lay person the report uses a number of terms, which are explained as follows:

Aderyn	The Biodiversity Information and Reporting Database of Local Environmental Records Centres Wales
Biodiversity	Biodiversity is defined as: "the variability amongst living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems."
Ecosystem	A dynamic complex of plant, animal and micro-organism communities and their non-living environment interacting as a functional unit. An ecosystem includes all of the living things (plants, animals and micro-organisms) in a given area, interacting with each other, and also with their non-living environments (weather, earth, sun, soil, climate, and atmosphere).

Ecosystem Services	Ecosystem services are the many and varied benefits that humans freely gain from the natural environment and from properly-functioning ecosystems. Ecosystem services are grouped into four broad categories: provisioning, such as the production of food and water; regulating, such as the control of climate and disease; supporting, such as nutrient cycles and oxygen production; and cultural, such as spiritual and recreational benefits.
Ecosystem resilience	A resilient ecosystem is one that is healthy and functions in a way that is able to address pressures and demands placed on it, and is able to deliver benefits over the long term to meet current and future social, economic and environmental needs.
Ecological Connectivity	Physical links that allow organisms to move between habitats, populations or assemblages that are isolated in space.
INNS	Invasive Non Native Species
Natural Environment	The natural environment encompasses all living and non-living things occurring naturally. It includes all plants, animals, micro-organisms, soil, rocks, air, water, and atmosphere.
NRW	Natural Resources Wales
Pollinator Species	A pollinator is an animal that causes plants to make fruit or seeds. They do this by moving pollen from one part of the flower of a plant to another part. This pollen then fertilizes the plant. Only fertilized plants can make fruit and/or seeds, and without them, the plants cannot reproduce
Ramsar	A Ramsar Site is a wetland site designated to be of international importance under the Ramsar Convention (an intergovernmental environmental treaty established in 1971 by UNESCO)
RSPB	Royal Society for the Protection of Birds
SAC	Special Areas of Conservation. These are strictly protected sites designated under the European Union Habitats Directive
SEWBRcC	South East Wales Biodiversity Records Centre
SDS	Sustainable Drainage System
SINC	Site of Importance for Nature Conservation
SPA	A Special Protection Area (SPA) is a designation under the European Union Directive on the Conservation of Wild Birds
SSSI	Site of Special Scientific Interest
WLGA	Welsh Local Government Association

2. EVIDENCE

Evidence Collected

- 2.1 Evidence was collected between March 2018 and November 2018 in order to gather a range of perspectives on this topic. This included:
- a. Overview – Corporate Performance Manager
 - b. Service Policy Briefing – Strategic Planning and Natural Environment Manager and Nature Conservation Team Leader
 - c. Trallwn and Brynhyfryd Primary School visits to observe RSPB education sessions
 - d. Roundtable Session – External Organisations (NRW, RSPB, SEWBReC, Plant Life, WWT, Swansea Biodiversity Partnership/Swansea Environment Centre, Forest School Swansea Neath Port Talbot)
 - e. Roundtable Session – ‘Friends of’ Volunteer Groups – Swansea Botanical Complex, Swansea Vale, Rosehill Quarry, Pentyla Playing Fields (Ganges), Kilvey Hill and Woodland, Morryston Park
 - f. Meeting with Development Conservation and Design Manager
 - g. Service Overviews – Corporate Building Services and Corporate Property Services
 - h. Legislation Session – NRW, Future Generations Office, WLGA
 - i. Findings Session – Input from Nature Conservation Team Leader
 - j. Cabinet Member Input
 - k. Head of Service Input

For full details of how the evidence was gathered, including details of the findings from each session, please see the findings report. This can be downloaded at <http://democracy.swansea.gov.uk/ieListDocuments.aspx?CId=610&MId=8272&Ver=4&LLL=-1>.

3. GENERAL COMMENTS

- 3.1 The key question for the Inquiry was: ‘What should Swansea Council do to maintain and enhance its natural environment and biodiversity, and, in so doing, promote the resilience of eco-systems?’
- 3.2 The environment is high in the public’s awareness at present locally and globally. From the reduction of single use plastics to the melting of Polar ice, people everywhere are becoming more and more aware of the impact we are having on the natural world and how these impacts are beginning to have a direct effect on people’s lives. This message has filtered all the way down to a local level and from Westminster to Welsh Government to local Councils the

message is clear – the environment matters. Waste and CO2 reduction targets are becoming more stringent. Green infrastructure is developing rapidly, and being more sustainable is at the top of concerns. Swansea Council has a major role to play in delivery and prevention, and in responding to the challenges set.

- 3.3 One of our overriding conclusions is that the breadth and depth of work already being undertaken to protect and enhance Swansea's natural environment is substantial. For many years, committed teams have striven to maintain and enhance the County's biodiversity, and the relationships that have developed and the local knowledge accumulated are outstanding. The Cabinet Member who has overall jurisdiction for this area of work is Councillor Mark Thomas, and it is clear that he is committed and passionate about the issue. This, along with increasing recognition of the importance of Swansea's outstanding natural assets, has driven the natural environment to be a key priority for Swansea Council.
- 3.4 The fact that the Council has a dedicated team to manage nature conservation shows that it is already committed to the issue long term, and this, of course, is in line with the requirements under the Environment (Wales) Act 2016 and the Well-being of Future Generations Act 2015. The delivery of the Scrutiny Inquiry also supports the thinking that Swansea is 'ahead of the game' when it comes to the environment, and is looking at how it can take the current good work and build on this to be a leading Council in Wales for the maintenance and enhancement of biodiversity.
- 3.5 It is clear that, for the general public, biodiversity is important. The Inquiry 'Call for Evidence' had a number of responses; with public and professionals alike making contact to contribute to the Inquiry and to be part of the effort to improve Swansea's natural environment. The volunteers who came to give evidence were committed, experienced and enthusiastic about the relationship between the public and the Council, and how this needs to be maintained, encouraged and supported to ensure the good work continues.
- 3.6 We were particularly heartened that almost every organisation we contacted was more than happy to contribute to the Inquiry, and provided a range of information to assist the Panel. They were incredibly generous with their time, offering to follow up on any issues and to submit further information if required. It is clear that there is no shortage of organisations willing to work with Swansea Council to achieve the goal of an enhanced environment and a successful green infrastructure approach, and these opportunities for collaboration need to be grasped.
- 3.7 Whilst all of the right foundations are in place for Swansea to have a thriving natural environment, it is now time to ensure this is built in early to all plans and projects and is recognised by all services. This will be essential for Swansea's future success both locally and globally.

4. CONCLUSIONS AND RECOMMENDATIONS

These are the Panel's conclusions together with full recommendations on how we feel the issues of complying with Welsh Government legislation and maintaining and enhancing the natural environment and biodiversity in Swansea could be addressed.

4.1 Create an environmental corporate priority to embed biodiversity in business and strategic planning to meet requirements

4.1.1 Although a new Corporate Well-being Objective 'Maintaining and enhancing Swansea's Natural Resources and Biodiversity' was approved by the Council during the course of the Inquiry, we felt it important to note how much of a positive step this is. The Panel feel that the Scrutiny Inquiry has contributed to this and we welcome its adoption and thank all those who were involved. The difficulties caused by not integrating the natural environment with other Council priorities has been highlighted not just by external providers and the public but also Council service providers themselves.

4.1.2 Throughout the course of the Inquiry, the Panel agreed that there needs to be a strategic approach to the natural environment, in order to ensure that the importance of the issue is highlighted and meets legislative requirements. The natural environment needs a significant commitment from within the organisation at all levels.

4.1.3 Although Welsh Government are wanting adherence to the requirements set out in the Environment (Wales) Act 2016 and the Well-being of Future Generations Act 2015, there is little advice on how exactly these requirements should be implemented. However, guidance for Section 6 of the Environment Act, the 'Biodiversity and Resilience of Ecosystems Duty' states that 'To follow the S6 duty public authorities should embed the consideration of biodiversity and ecosystems into their early thinking and business planning, including any policies, plans, programmes and projects, as well as in their day to day activities.' This requires the environment to be considered at the earliest stages of all Council activities. The Panel agreed unanimously that the only way to achieve this is to include it in the Corporate Plan, as now enacted by Council.

4.1.4 It is not just the Panel who feel that more senior officer commitment is necessary for success. During the roundtable discussion with external environmental providers, it was stated that 'senior management need to be involved and for the issue to be taken seriously at the highest level'.

4.1.5 There is also a feeling that a lack of definition around the importance of the issue is causing conflict. Volunteers echoed this, saying 'Council departments have differing priorities, some financial and some environmental'. They felt that whilst there is much support from particular teams, this dedication was not harmonious throughout the whole organisation.

- 4.1.6 This issue is not limited to external organisations and volunteers. During evidence gathering with Council services, the Panel found that this same lack of consistency causes practical problems. Corporate Property services highlighted that the policy conflict between financial and environmental issues can cause problems, and outcomes had been determined by negotiation rather than from a corporate commitment to delivering our biodiversity responsibilities. Some services also felt that a corporate priority for the environment would allow the good work already happening to be recognised and encouraged. Corporate Building Services stated that they would like to see a top down approach to biodiversity to ‘...ensure that the message is filtered through the organisation in the same way other important messages are’. It is clear that internally, there is a definite commitment from staff to enhance the environment, but there also needs to be a strong and consistent organisational message in order to achieve measurable outcomes.
- 4.1.7 As Neville Rookes from the Welsh Local Government Association advises - ‘There should be environment in every policy and every policy in environment’. This will involve mainstreaming the environment and biodiversity across all Council services, together with raising awareness, a culture shift and appropriate procedural changes.

Recommendations

Recommendation 1: Development and implementation of a Corporate Biodiversity Action Plan to take this forward (Medium Term)

Recommendation 2: Ensure the Action Plan links with other relevant cross organisational policies at a strategic level, for example, the Local Well-being Plan and Area Statements (Medium Term)

Recommendation 3: Develop a clear and enthusiastic vision and message for maintaining and enhancing biodiversity to ensure a consistent ‘buy-in’ from each service (Quick Win)

4.2 **Raise the profile of the Natural Environment and Biodiversity internally and externally**

- 4.2.1 Notwithstanding the introduction of the Environment (Wales) Act 2016 and the Well-being of Future Generations Act 2015, the profile and understanding of the natural environment is not as high as it should be. This applies both to Council staff and to the wider public.
- 4.2.2 This issue is not specific to Swansea. We heard from the Future Generations Commissioner’s Office staff that ‘A Resilient Wales’ well-being goal was regularly misinterpreted in the Well-being of Future Generations Act. Instead of championing the importance of biodiversity, resilience was being used to mean economic, community or often social resilience. This misrepresentation reduces the amount of ecological attention and delivery under the goal.

- 4.2.3 Internally, during the Inquiry, each Head of Service was sent a questionnaire asking about the biodiversity duty and how they feel their service contributes to it. Interestingly, of the 11 responses received only 6 were aware there was a biodiversity duty, 2 admitted they were not aware and 3 did not answer the question. This highlights that more knowledge and awareness around the biodiversity duty is needed. This will then make it easier to embed biodiversity and develop projects across other service areas.
- 4.2.4 However, despite a lack of knowledge around the duty, there is definitely an appetite to increase information for the services and to undertake tasks to enhance the natural environment and biodiversity. Heads of Service were asked if they had ideas about how to work differently to enhance biodiversity at work and 7 of them had ideas that they would like to implement, but insufficient budgetary provision was the main constraint to implementing these ideas.
- 4.2.5 Externally, there are some very committed residents and organisations who have an interest in biodiversity, and the large public response and support for the natural environment shows that there is substantial knowledge in the community. However, there is still plenty of scope for awareness raising, with a desire to learn more and integrate biodiversity into the Council's functions. The following recommendations would promote the natural environment in general, thereby promoting ecosystem resilience.

Recommendations

Recommendation 4: *Embed the new corporate priority by developing and delivering relevant training. The Nature Conservation Team could roll out training at the appropriate level and could undertake a service appropriate assessment with ideas and input coming from that service to encourage involvement. (Medium Term)*

Recommendation 5: *Make information available to the public to encourage participation and understanding, including continuing to develop the Natural Environment web pages e.g. explain why some verges are wild or why projects which have a green aspect are taking place. Public promotion is vital. (Quick Win)*

4.3 **Maintain and increase the specialist and high quality work which is currently delivered**

- 4.3.1 Swansea Council do a lot of preventative and proactive day to day work, including policy development. The dedicated Nature Conservation Team (FTE 5 staff), along with complimentary teams such as The Countryside Access Team (5 staff), the Area of Outstanding Natural Beauty Team (AONB) (2 staff) and Strategic Planning Team (7 staff) work together to enhance, maintain and promote awareness and appreciation of Swansea's natural environment. However, it appears these teams are stretched to full capacity.

- 4.3.2 Despite the majority of the county being rural and having some form of environmentally important status, these teams provide the only nature based resource to Swansea Council. They deal with a wide range of work including policy and strategy development, planning ecology, community projects, access improvements, awareness raising, land management and enhancement and partnership working.
- 4.3.3 Other organisations such as Natural Resources Wales, Swansea Environmental Forum and SEWBReC, all praised the work of the Council's Nature Conservation Team, and said that working in collaboration with them has benefited Swansea. The work being delivered by the team directly contributes to the maintenance and enhancement of biodiversity at both an operational and strategic level. Senior representatives from organisations highlighted that the behind the scenes work of policy development, mitigation recommendations and input into strategic planning is often what stops the Council from breaching its duties under relevant Acts and facing potential legal issues.
- 4.3.4 The members of various voluntary groups in Swansea also said the work currently being done is highly regarded and in demand. Volunteers often request extra time where possible with the team, to benefit from their expertise and make the work carried out by these groups more effective and appropriate.
- 4.3.5 The Local Authority owns a significant amount of land that is of ecological importance including
- Special Areas of Conservation, Ramsar Sites, SPAs.
 - Sites of Special Scientific Interest and Nature Reserves
 - Sites of Importance for Nature Conservation.

The Authority has a duty to manage its estate in accordance with the relevant biodiversity legislation. A pilot project is underway to map biodiversity assets and opportunities at a ward level to inform place based decision making.

The Nature Conservation Team is responsible for the management of 6 Local Nature Reserves and a number of Council owned SAC's, SSSI's and SINC's. It also provides advice to other Council staff with land management responsibilities. This involves the preparation of management plans and agreements, practical site management and maintenance work, tackling invasive non-native species (INNS), managing contractors and supporting community and volunteer participation in biodiversity delivery.

Recommendations

Recommendation 6: Complete and publicise the ward mapping exercise. This would provide each ward and the Councillor Representatives with information specific to that ward. It would include information about important species, protected sites and other relevant ecological information as well as potential opportunities for improving biodiversity within the ward. A link to the ward mapping should appear on planning applications when completed. This would help when it comes to planning applications and empower ward councillors and residents to be able to respond to issues which threaten these special features of their ward and encourage maintenance of biodiversity. It would also contribute to the enforcement activity of the Council. (Long Term)

Recommendation 7: Maintain support for volunteers, Community Councils and groups managing both Council owned and non-Council owned land. There are important areas of natural environment in Swansea that may be managed by trusts or owned privately. The links to these areas need to be maintained to ensure best practice is shared and any relevant information/policy can be applied across Swansea, improving nature-based connectivity overall. (Long Term)

4.4 Recognise the benefits of 'nature-based' prevention projects, such as to limit air pollution and for flood risk management etc

4.4.1 One of the recurring messages to come out of the Inquiry was that there is a move to look at nature based solutions to deal with problems which previously would have been rectified with hard engineering solutions. During the evidence gathering process, Neville Rookes a Policy Officer for Environment from WLGA, highlighted that other Councils were starting to implement nature based solutions for issues such as flooding and doing so with great success. A project on the River Taff was given as an example, which aimed to achieve flood defence and prevention through the development of a wildlife pond and a cycle path.

4.4.2 One of the Swansea projects that was referenced by organisations including Plant Life, Swansea Environmental Forum and Natural Resources Wales as a huge success, was the Marram Grass Scheme used in the sand dunes at Swansea Bay. This innovative, nature based project was a collaboration of services including nature conservation, highways, drainage, parks and Natural Resources Wales. A specialist study concluded that the most sustainable way to control windblown sand between the beach and promenade was to construct sand trapping fences, with subsequent marram grass planting to stabilise and increase existing dunes and establish new ones. This has been successful and should set the tone going forward.

- 4.4.3 The Panel heard that there is scope to look to green solutions for many existing and potential problems. The suggestion of not mowing some verges, planting trees to alleviate flooding, planting native wildflowers and using 'green' initiatives to enhance well-being are all realistic and money saving options as far as the Panel is concerned. There is already evidence of community gardening projects having positive effects on users engaged with social services, and there is a raft of evidence produced by various organisations highlighting the benefits to both physical and mental health to being outside and engaged in green projects.
- 4.4.4 The Well-being of Future Generations Act requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as climate change. WLGA advise that, as a Council, we must use the 5 ways of working to shape the strategy and policy of everything that we do. Ecological resilience should be incorporated at the start of projects. In the short and medium term, there is a risk of reputational damage and possible legal infractions and failure to meet EU requirements; in the long term, it will be infraction of whatever UK law is in place after Brexit, if the latter goes ahead. The Office of the Future Generations Commissioner for Wales' representative agreed with these points.
- 4.4.5 An easy and cost effective way of achieving results is to include a clause in any service level agreement for land that is owned by the Council but managed on a day to day basis by another group or individual. Up to now, there has not been a biodiversity clause to remind land users of their obligation and to highlight the importance of the issue. Following discussion within this Inquiry, a clause has now been inserted into the service level agreement for community groups managing green spaces. The Panel felt that this was an easy way of highlighting and legally requiring the maintenance and enhancement of the environment of these pieces of land. There should be more detailed clauses in other agreements e.g. those agreements relating to grazing sites, and also in those entered into with external event organisers which require Council consent before certain activities (e.g. clearing land) are undertaken, to prevent loss of biodiversity.

Recommendations

Recommendation 8: *Insert a relevant biodiversity clause into service level agreements, licences etc which relates to land use and land management and land use and ensure that the importance of these clauses is made clear to the land managers/occupiers and the implications of not meeting them are highlighted. (Quick Win)*

Recommendation 9: *Assess the verges in Swansea that can stop being mowed and sprayed. Give these over to nature and allow for self-seeding, which will encourage native plants and pollinator species. This can also save money as less frequent mowing is required. There could be signs erected to highlight the project to help change the culture. (Medium Term)*

Recommendation 10: *Where appropriate, plant native wildflowers and trees. Non-native species do not benefit pollinators to the same extent as native species. (Long Term)*

Recommendation 11: *Encourage green projects for well-being such as gardening projects, outdoor green-space activities and volunteering opportunities for adults and children across all relevant services. This includes linking with Community Councils. Communities can make use of the 'Community Green Space Toolkit' which can be found online at <http://swanseacommunitygreenspaces.weebly.com> (Long Term)*

4.5 **The need for and costs of providing additional resources to maintain the natural environment should be recognised and shared throughout services**

4.5.1 External providers, including NRW and Welsh Government, have commented on the level of expertise and passion in the Council's Nature Conservation Team. However it seems that the people and organisations who know of their activities are those who work most closely with them. There is very little publicity being undertaken around the work of the team, whether internally or externally. The Panel feel that if the work that is being undertaken were to be publicised more, other Council staff and the public would realise both the importance of the issue and the breadth of work currently being delivered. There is an obvious difficulty here, publicising work takes time and resource, which is scarce in this team as it is, and highlighting activity could lead to an influx of demand which the team is not resourced to deal with. This has been an ongoing issue for some time and, although the new corporate priority has not created more work than the team can presently deliver, demand for support is expected to increase as biodiversity becomes embedded. This highlights just how vulnerable they are to resource reduction through loss of grants and unsustainable temporary posts e.g. Temporary Planning Ecologist Post.

4.5.2 This problem is not specific to this team, particularly during such a difficult financial climate; however, the Panel feels there does need to be some rethink over how this service is funded. During the roundtable session with providers, Natural Resources Wales stated that 'The best examples of funding are when the budget comes from each Council department which impacts or benefits from the natural environment and biodiversity'. Echoing this sentiment, RSPB Cymru commented that 'estates, parks, planning and regeneration all need to be on the same page when it comes to biodiversity and nature conservation'. In agreement with both of these comments, the Panel feels that there are many services in the Council which benefit from having a thriving natural environment, not least tourism. However, despite the selling point of Gower and the green spaces in Swansea and the money that is made, for example from car park charges or grazing licences, none of this income is received by the Nature Conservation Team (along with complimentary teams such as Countryside Access and AONB). The Panel feels that this is unreasonable, considering specific services need the environment to be in a good state for them to be as successful as they are. Services that see benefit from a thriving and healthy Swansea should contribute to its upkeep.

The Team has identified and secured some income from charging for its services for example school visits, and tendering for commercial biodiversity contracts (e.g. ecological surveys, management plans, interpretation etc.), but this can only be expanded with additional staff capacity.

- 4.5.3 One of the issues identified during the Inquiry was a lack of knowledge amongst professional officers, who are not ecologists, of the specifics of how environmental conditions attached to planning consents should be implemented, (e.g. how and where to install bat boxes and the most appropriate design, how to create habitats for mitigation, etc.). Despite the legislation there is no statutory requirement to employ an ecological enforcement officer. The Panel question how effective any legislation can be if there are insufficient enforcement resources available – legislation becomes a suggestion rather than a direction. The Planning Ecologists explained that they cannot ensure that the environmental requirements that are conditioned within planning consents are fully delivered/realised due to a lack of staff capacity within the service to monitor and enforce conditions. Therefore, we cannot be sure that we have complied with our legal duties under the Environment Wales Act, and the Planning Act. There is a risk that less responsible and more cynical developers could take advantage of this. There is a substantial need and requirement for an additional ecologist with specific responsibilities for monitoring compliance with environmental conditions attached to planning permissions. Such an officer would benefit and support a range of services including planning, and would promote a zero tolerance message to anyone who was breaching the law and causing Swansea's biodiversity to be damaged.

Recommendations

Recommendation 12: *Employ a Section 6 Officer to co-ordinate, support and promote the consideration and delivery of a range of environmental projects across Swansea and also ensure the Council are meeting the requirements of the Environment Act (Section 6). This includes the development of a Corporate Natural Environment Working Group. This should stop us breaching the legislation and potentially facing fines/restricted grant access/reputational damage. (Quick Win)*

Recommendation 13: *Employ an additional Planning Ecologist/Ecological Enforcement Officer to work with Council services with a specific duty to help ensure the environmental conditions and section 106 obligations on planning consents are met, whilst also contributing to maintaining biodiversity, and meeting the requirements of the new Sustainable Drainage System legislation. (Quick Win)*

Recommendation 14: *Share natural environment and biodiversity costs across services. Much of the work completed in relation to biodiversity is funded by a single team's budget. Considering both the Council as a whole, and certain specific services, benefit from a thriving environment, it seems appropriate that other services should be contributing financially to this work. (Long Term)*

4.6 **The authority should work co-productively with external partners on a strategic scale**

4.6.1 There is an assumption from Welsh Government that public authorities and other agencies will link together on common projects and develop solutions based on their combined knowledge. From strategic decisions to day to day activities, the input from other relevant organisations should help lead to the best outcomes. The Inquiry Panel agrees that this is the best way forward, and the contribution of agencies and the public to the Inquiry strengthened the idea that many heads are better than one. Hearing different perspectives and experiences led the Panel to conclude that more knowledge with shared aims leads to better decision making. This is not a new idea but one which is in the process of being embedded, with work being delivered under the Public Services Board (PSB) with this exact ethos at its heart. The purpose of the PSB is to work collectively to improve the local social, economic, environmental and cultural well-being in a local authority area. Working in isolation is no longer an option.

4.6.2 All of the agencies who contributed to the evidence gathering of the Inquiry expressed an interest and discussed the benefits of strategic collaborative working. It is not enough that one or two staff members have good links with an organisation; all of the services which have any involvement in the environment in Swansea need to be developing and regularly contributing to these conversations and actions. Services such as Corporate Property and Highways and Transportation need excellent relationships with organisations like SEWBRc, NRW, Plant Life and the Swansea Environment Forum, so the best decisions can be made for the environment. We already as a Council work closely with the aforementioned organisations, along with the Royal Society for the Protection of Birds Cymru (RSPB) and the Wildlife Trust of South and West Wales, and these relationships should be nurtured and expanded.

We spoke to all of the groups that attended and asked what their advice for the Council would be. They said:

- 1. Biodiversity has to be maintained and improved for the future generations in line with the Act.*
- 2. Sign up to the Service Level Agreement with SEWBRc to access important mapping/species data for projects.*
- 3. Stand by the policies it already has.*
- 4. Work in partnership to achieve projects, this will reduce costs and bring in expertise.*
- 5. Improve communication within departments and challenge those (including external organisations) who are not doing what they should be.*
- 6. Develop links with the right staff and consult at the right stage.*
- 7. Do not ignore the lower Lliw Valley.*
- 8. Take responsibility for developing plans and getting departments to work together not against each other.*

9. *Senior management need to be involved and this needs to be taken seriously at the highest level.*
10. *Value volunteers and volunteer co-ordinators – some money and effort has to be put in.*

- 4.6.3 One of the important collaborative projects that the Panel supports is access to biodiversity data via the South East Wales Biodiversity Records Centre (SEWBRc) Service Level Agreement. The role of SEWBRc is to collect, verify, digitise and share species and habitat data with public, private and third sector organisations and individuals. These data are gathered by professional ecologists and specially trained volunteers and the public, and can then be accessed to assess the impact of projects which are being proposed. This includes planning applications, development schemes and conservation activities. Swansea Council did not access this information between 2004 and 2017 due to lack of funding and are at a disadvantage without it. So much of Swansea has important species that it is unlikely anyone can undertake a project without having an impact under the provisions of the Environment (Wales) Act 2016 and/or the Well-being of Future Generations Act 2015. The SEWBRc information can be used to complete full audits of sites and create buffer zones around projects. Information is sent to officers via Aderyn (The Biodiversity Information and Reporting Database of Local Environmental Records Centres Wales) and ensures that better decisions are made around ecology, land management and development. This is the kind of strategic partnership work which needs to be included in wider departmental activities with funding of the SEWBRc Service Level Agreement being shared between relevant services.
- 4.6.4 Strategic partnership working does not only make sense in terms of delivering the best and practical solutions, it is a requirement that may have financial impacts if not achieved. Not meeting these collaborative requirements under the Acts will have impacts on access to future grants e.g. the Welsh Government Enabling our Natural Resources and Well-being Grant, which has emphasis on joined up, cross sector working. Considering that the current financial outlook for the public sector is bleak, further limiting access to financial aid is not a risk the Panel feels the Council should take.

Recommendations

Recommendation 15: *Renew the South East Wales Biodiversity Records Centre (SEWBRc) service level agreement for 2019/20 (with a plan in place to achieve this in subsequent years) the approximate cost is between £8,000 and £10,000 per annum. The relevant departments (Development Management, Highways, Corporate Buildings and Corporate Property) should be contributing to the costs of accessing this information, using this resource regularly and, where necessary, asking the Council's ecologists to interpret the data. (Quick Win)*

Recommendation 16: *Continue to nurture good working relationships with external agencies and encourage other services to do the same. This should not be limited to national organisations but should also include local ones such as Swansea Environmental Forum, the Swansea Biodiversity Partnership and the Swansea Environment Centre. (Long Term)*

4.7 **Recognise, encourage, maintain and expand commitment from voluntary groups, Community Councils and the public in maintaining and enhancing the Council's green spaces**

- 4.7.1 Swansea has a significant number of volunteer groups, working unpaid to maintain a range of community spaces: some of these are community centres and some are green spaces such as parks and gardens and wildlife sites. The Panel met with and gathered evidence from these groups to explore the extent and the nature of the work being undertaken. The opportunity to contribute raised considerable interest, with 8 group leaders being invited to give evidence and present information on their work. The message from all of the groups was the same - the support they currently receive from the Nature Conservation Team is excellent, but they need more contact and information and more ways of linking in with the projects of biodiversity relevant to their areas. More support and advice could be provided, but again the limiting factor to this is the lack of capacity within the Nature Conservation Team. The other major recurring issue was the need to make strong links with schools. Children should be enabled to make better use of the spaces around them and have this built into the education curriculum. This also links in with a wider issue around using green spaces to improve and increase well-being.

Some of the main comments made in the voluntary group session are listed below:

- *Groups rely on specialist expertise like the Nature Conservation Team to support their projects.*
- *There should be two main points of contact for the groups;*
 1. *A horticulture/environmental specialist*
 2. *An Education Officer linking schools to the spaces*
- *Records (for example ecology surveys/protected sites) need to be accurate to ensure decisions made are based on correct information.*
- *Neath Port Talbot Council have a scheme where road verges are designated as 'wild' and mown/maintained differently – Swansea should do the same and help change the public perception.*
- *Some people will complain that 'wild' areas are neglected but there needs to be a culture change.*
- *Would like to list the flora and fauna in the park but cannot because the groups do not have the expertise to do this.*
- *The Council departments seem to have differing priorities from each other – some financial, some environmental, these need to be reconciled.*
- *Ecological reports which are submitted for planning applications should be accurate and impartial.*

- *Groups want the Council to recognise the importance of sites to people and the environment.*
- *Having a link to liaise with schools is essential as it encourages learning and involvement in the area.*
- *Public signs advertising the areas would be beneficial so people know the sites are there for visiting.*
- *Groups are desperate for expertise and the planning and identification of existing biodiversity.*
- *Initiatives don't come with maintenance plans or budgets to keep projects sustainable.*
- *Working between departments can be difficult as they have differing agendas.*
- *Groups are able to pull in funding if they apply properly.*

4.7.2 The Panel issued a public survey asking for submissions from interested parties. We had 37 responses from the public along with 3 full submissions. This is an excellent response for a scrutiny call for evidence and shows the substantial interest that the public has in the issue of environmental conservation. However, the public and volunteer interest in the whole issue of biodiversity is not limited to the work of this Inquiry, indeed the Cabinet Member for Environment and Infrastructure Management has recognised that this issue has substantial public support.

There are far too many responses from the public to include in this report and there was a mixture of praise and criticism. Below is a selection of comments from both sides:

Positives

- *'The parks are beautiful and everybody loves the summer flowers'*
- *'The Gower coastline'*
- *'Have a good team in the Council despite being underfunded'*
- *'I love the wildflowers and City parks'*
- *'Planting of wildflowers along the roadways and verges: looks great and is good for bugs'*
- *'Promoting use of rights of way, environment sites etc, small team based efforts e.g. highways staff'*
- *'The team do a good job maintaining nature reserves and running education/awareness raising activities'*
- *'Leaving areas in parks with uncut grass'*
- *'Swansea is becoming better aware of its fabulous natural setting, our hills, the bay and the Gower'*
- *'Nature Conservation Team very knowledgeable and works well stabilising dunes, making paths'*
- *'The Lower Swansea Valley project – that was improving the natural environment at its finest'*

- *'Wild flowers, having an Environment Centre and Swansea Environment Forum'*

Room for Improvement

- *'A joined up approach that expects actions from all teams not just those in 'environmental' roles'*
- *'I am a bee keeper in the Uplands and it is detrimental that you are still spraying bee killing stuff. I am aware that to sow summer flowers you actually treat the ground every year with pure poison. Why? Is there not a natural way – just dig it like any other gardener does'*
- *'Applying policies when taking planning decisions. Shocking lapse when permitting housing development to destroy a site which the Council itself had protected'*
- *'Car free days. Plant trees, hedges, rooftop gardens on public buildings to counteract pollution and assess effectiveness against pollution levels in urban areas'*
- *'Don't cut down mature trees work round them, plant native trees and shrubs, reduce hard surfaces'*
- *'Look after the shoreline for birds'*
- *'Raise the profile of the natural environment and biodiversity in Swansea'*
- *'Reduce pollution, clean local beaches, look at reducing plastic pollution, more nature reserves'*
- *'I am aware that Singleton Park has done a lot to promote wildflowers STOP SPRAYING then, because honey bees and single bees are killed with the spraying of weeds'*
- *'Control of invasive non-native plants'*

Recommendations

Recommendation 17: *Invite environmental voluntary group and Community Council representatives to regular liaison meetings e.g. Friends of parks and wildlife sites. This would allow them some support and access to some specialist advice from relevant officers (e.g. Parks Team, Nature Conservation Team, Education Link Officer), whilst allowing them a forum to discuss concerns and success. The loss of these groups would have a severely detrimental impact on the management of Council land and finances, so there needs to be ongoing and meaningful engagement and support from the Council. (Medium Term)*

4.8 **There should be more cross departmental working, with the shared aim of maintaining and enhancing the natural environment and biodiversity, together with their eco-system benefits.**

4.8.1 During the evidence gathering, it became clear that the Council has some conflicting policies when it comes to the natural environment. Corporate Property Services referred to the fact that there is a clash in priorities between making money and maintaining the environment.

The public have also alluded to this issue:

- *[The Council needs...] ‘ A joined up approach that expects actions from all teams not just those in ‘Environmental’ roles’*
- *‘The Council departments seem to have differing priorities from each other – some financial, some environmental’*

4.8.2 Whilst the legislation is the same for all of the Council and applies to all services equally, applying the legislation in line with existing internal policies can be problematic. The Panel felt that the battle between these issues can be difficult, especially for staff when they are trying to apply and deliver other corporate priorities. It can be frustrating for staff to have to negotiate internally processes which are required legally, and push for standards that are being frustrated by internal dynamics. The Panel feels that whilst there should always be a balance between economic regeneration and the environment, development should not come at the expense of the environment.

4.8.3 The public have commented that when contacting different services they do not get a consistent response on the Council’s approach to the issue of biodiversity and the environment. Whilst it is reasonable for the Nature Conservation Team to deal with specialist public queries on the environment, the issues which are directed to a different service such as parks, estates or highways for example should have the same response. There needs to be a consistent and Council wide position on the issue of the environment. This can only be achieved if the message and delivery of our legislative duty is the same across the board. The Panel feels that whichever department you contact, the response and approach to an environmental question should be the same: common objectives and a strong and consistent message will achieve this. The establishment of a corporate biodiversity working group, as provided for in the Corporate Plan, will help to address and improve this.

4.9 **There needs to be a commitment to natural environment education in schools**

4.9.1 During the Inquiry, the Panel members visited local primary schools to see how they manage the issue of the natural environment and how this feeds into pupil’s education. Whilst it was generally accepted that most schools do pay particular attention to the natural environment and include it as part of the curriculum, its delivery is patchy and inconsistent from school to school. It is evident that some schools are at an advantage due to their geographical suburban location, whilst others are almost completely urban with very little or even no green space. However, the feedback from those involved in environmental education is that no matter how small the green space is in a school, biodiversity can still be encouraged and learned about. The Panel, many of whom are School Governors, feel that there is an inconsistency in how the natural environment is prioritised, with some schools celebrating achieving ‘Green School’ status whereas for some others the natural environment is only of passing interest in children’s education.

4.9.2 The current curriculum requires pupils to use and develop their skills, knowledge and understanding, by investigating how animals and plants are independent yet rely on each other for survival. Panel members observed a very successful scheme run by RSPB Cymru called the 'Schools Outreach Project', delivered by RSPB Project Officer Sarah Reed. This project saw 5849 pupil connections made in the academic year 2017-18; the delivery and impact in Swansea has been substantial and has proved very popular with staff and children alike. During the visits and observation sessions it was clear that the pupils really enjoyed being outside and when asked said they thoroughly enjoyed the activities.

During the school visits, the pupils (primary) were asked questions about nature and their responses were noted. The questions and some of the responses are captured below:

1. Do you like learning about nature? Why?

- *'Yes it is interesting to learn about it in school and is fun to learn about all the animals'*
- *'Yes because it's calm and interesting'*
- *'Helps us help the environment'*
- *'It makes me feel amazed'*
- *'You get to go outside'*
- *'We can learn what the grass is made of'*

2. Do you think Swansea should have more nature?

- *'Yes and no. No because animals can come over and [we would] be in more danger, yes because nature helps you live, like the trees have oxygen and oxygen helps us live'*
- *'Yes!'*
- *'Yes because hedgehogs are becoming extinct'*
- *'Yes because we don't have anything'*
- *'People will appreciate nature more'*
- *'It will help insects and our planet'*
- *'Yes because nature is beautiful and no-one goes outdoors that much anymore so if there was more nature people would want to go out even more'*

3. Why is nature important?

- *'Because it helps the environment'*
- *'Because it helps animals'*
- *'It is part of our circle of life. Plants = medicine'*
- *'It makes the world go round'*
- *'We have an ecosystem, nature gives us oxygen'*
- *'Animals keep us company'*
- *'It helps our earth go on and helps our health and gives us food and life'*

4. How does being around nature make you feel?

- *'It makes us feel happier and healthier. It also makes us feel relaxed, calm. Feels like my own world and satisfying because I hear the birds tweeting'*
- *'Happy, satisfied, calm, interested, relaxed, freedom'*
- *'Happy collecting flowers and seeing baby chicks being born'*
- *'Nature makes me happy when I'm around it and relaxed!'*
- *'Happy, excited, bored, fascinated, mesmerised, relaxed'*
- *'It makes us feel bored because there is no Wi-Fi'*

4.9.3 The Nature Conservation Team supports schools to deliver outdoor learning, including for example at Bishop's Wood Local Nature Reserve, Caswell, where around thirty schools visit each year. Where resources have allowed, officers have also delivered activities on other sites as well as supported schools to carry out activities or biodiversity-enhancement projects within their school grounds.

4.9.4 Evidence shows that schools value and require the support of experienced outdoor learning professionals to help them embed outdoor learning in the curriculum. The Nature Conservation Team are currently working on an NRW-funded project to pilot an approach to support and enable twenty primary schools to deliver outdoor learning in their grounds and using local green infrastructure.

4.9.5 The Panel applauds these examples of excellent good practice, but recognises that they are almost entirely reliant on external funding and are unlikely to be sustained beyond the short-term. For outdoor learning to become embedded throughout all schools there needs to be dedicated resources provided.

Recommendations

Recommendation 18: *Create environmental link Governors on school governing bodies who can take relevant information and projects to their school. They can also report back on a school's activities and this can be used to contribute to the 3 yearly section 6 report to Welsh Government on the Council's performance. (Medium Term)*

Recommendation 19: *Encourage better use of school grounds and local wildlife sites for biodiversity. For example, gardens, growing schemes, tree planting, wildlife ponds and habitat creation. This can be done by linking in with relevant organisations such as RSPB and sharing good practice with schools who are already doing such activities. 'Making the Most of School Grounds' guidance booklet. (Long Term)*

Recommendation 20: *Employ a dedicated outdoor learning officer who can provide the tailored support, training and delivery that will enable Swansea schools to fully realise the potential of outdoor learning, to deliver educational and wellbeing benefits, from the varied natural resources which Swansea possesses. (Medium Term)*

5. RECOMMENDATIONS – SHORT/MEDIUM/LONG TERM

5.1 The Panel recognises that the Authority:

- (a) will need to ensure that any subsequent actions are legal and meet the requirements of any relevant legislation;
- (b) has a responsibility to make the best use of limited resources and that any additional costs will need to be considered carefully as part of the annual budget setting process.

The Panel has kept these principles in mind in the course of its investigations.

The Panel commends Cabinet to consider all issues and ideas raised by this Inquiry and, in particular, the recommendations set out below.

Quick wins (within 6 months)

- Q1. Develop a clear and enthusiastic vision and message for maintaining and enhancing biodiversity to ensure a consistent 'buy-in' from each service.
- Q2. Make information available to the public to encourage participation and understanding, including continuing to develop the Natural Environment web pages.
- Q3. Insert a relevant biodiversity clause into service level agreements, licences etc which relates to land use and land management and ensure that the importance of these clauses is made clear to the land managers and the implications of not meeting them are highlighted.
- Q4. Renew the South East Wales Biodiversity Records Centre (SEWBReC) Service Level Agreement for 2019/20 (with a plan in place to achieve this in subsequent years).
- Q5. Employ a Section 6 Officer to co-ordinate, support and promote the consideration and delivery of a range of environmental projects across Swansea and also ensure the Council are meeting the requirements of the Environment Act (Section 6).
- Q6. Employ an additional Planning Ecologist/Ecological Enforcement Officer to work with Council services with a specific duty to help ensure the environmental conditions and section 106 obligations on planning consents are met, whilst also contributing to maintaining biodiversity, and meeting the requirements of the new Sustainable Drainage System legislation.

Medium term improvements (6-12 months)

- M1. Development and implementation of a Corporate Biodiversity Action Plan.
- M2. Ensure the Action Plan links with other relevant cross organisational policies at a strategic level, for example, the Local Well-being Plan and Area Statements.

- M3. Embed the new corporate priority by developing and delivering relevant training.
- M4. Invite environmental voluntary group and Community Council representatives to regular liaison meetings e.g. Friends of parks and wildlife sites. This would allow them some support and access to some specialist advice from relevant officers.
- M5. Create environmental link Governors on school governing bodies who can take relevant information and projects to their school.
- M6. Employ a dedicated outdoor learning officer who can provide the tailored support, training and delivery that will enable Swansea schools to fully realise the potential of outdoor learning, to deliver educational and wellbeing benefits, from the varied natural resources which Swansea possesses.
- M7. Assess the verges in Swansea that can stop being mowed and sprayed. Give these over to nature and allow for self-seeding, which will encourage native plants and pollinator species.

Long term challenges (12 months+)

- L1. Complete and publicise the ward mapping exercise. This would provide each ward and the Councillor Representatives with information specific to that ward. It would include information about important species, protected sites and other relevant ecological information as well as potential opportunities for improving biodiversity within the ward
- L2. Maintain support for volunteers, Community Councils and groups managing both Council owned and non-Council owned land.
- L3. Where appropriate, plant native wildflowers and trees. Non-native species do not benefit pollinators to the same extent as native species
- L4. Encourage green projects for well-being such as gardening projects, outdoor green-space activities and volunteering opportunities for adults and children across all relevant services.
- L5. Share natural environment and biodiversity costs across services.
- L6. Continue to nurture good working relationships with external agencies and encourage other services to do the same.
- L7. Encourage better use of school grounds and local wildlife sites for biodiversity.

6. ACKNOWLEDGEMENTS

The Panel is very grateful to everyone who contributed to the Inquiry.

We would like to thank the staff and especially the pupils at Brynhyfryd Primary School and Trallwn Primary School for allowing us to observe their RSPB session and for being welcoming and open to questions and queries.

Special thanks go to everyone who took the time to respond to the public call for evidence. These responses allowed the Panel to understand how the residents of Swansea feel about this important issue and informed the direction of much of the Panel's thinking. Every response was read and considered. The culture change we are trying to achieve would not be possible without such passionate and involved people.

We would also like to recognise the input of the Council staff involved in this inquiry – Paul Meller, Strategic Planning and Natural Environment Manager, and Deb Hill, the Nature Conservation Team Leader, along with their teams, have provided a wealth of information to allow the Panel to understand the current processes and projects. We must also mention the ongoing support of Mark Thomas, the Cabinet Member for Environment and Infrastructure, who has supported the case for the natural environment for some time.

The Panel would like to record its thanks to the following people who came and gave evidence to us:

Colin Cheeseman	Plant Life
Heather Galliford and Chris O'Brien	RSPB Cymru
Nigel Ajax-Lewis	South-West Wales Wildlife Trust
Adam Rowe	South East Wales Biodiversity Records Centre (SEWBRc) Limited
Max Stokes and Kerry Rogers	Natural Resources Wales
Steve Bolchover	Swansea Biodiversity Partnership/Swansea Environment Centre
Chris Dow	Forest School SNPT
Christian Servini	Change Maker, Future Generations Commissioners Office
Neville Rookes	Policy Officer – Environment, Welsh Local Government Association
Neil Barry	Swansea Community Green Spaces Project Officer

Pamela Morgan	Past Chair of Friends of the City of Swansea Botanical Complex
Neil Jones	Swansea Vale/Swansea Friends of the Earth
Rosemary Harvard-Jones	Rosehill Quarry/Friends of Ganges
Phil Stockton	Pentyllia Playing Fields (Ganges)
Linda Summons	Kilvey Hill Woodlands/Friends of the Earth
Marian Francis	Kilvey Community Woodland
Steffan Phillips	Chair of Friends of Morrision Park
Christine Thomas	Coed Bach Pontarddullais
Sarah Reed	RSPB Cymru Project Officer

7. **FURTHER SCRUTINY NEEDED**

As well as our recommendations for Cabinet, we have also identified a number of issues that we believe may require further scrutiny. We propose to the Scrutiny Programme Committee, therefore, that future scrutiny work programmes examine:

- Glyphosate and its use by the Council for spraying – this was initially explored as part of the Inquiry, but the issue was too complex and contentious to include in an already substantial subject area.
- The management of common land
- The management of the marine environment
- Tackling Climate Change
- Management of the Gower Area of Outstanding Natural Beauty (AONB)

8. **ABOUT THE INQUIRY PANEL**

The Natural Environment Inquiry Panel is a team of Councillors who are not members of the Cabinet. Their role is to examine a strategic issue of concern and to make recommendations about how policies and services can be improved.

Members of the Panel:

- Peter Jones (Convener)
- Wendy Fitzgerald
- Louise Gibbard
- Paxton Hood-Williams
- Yvonne Jardine
- Jeff Jones
- Irene Mann
- Hazel Morris
- Sam Pritchard
- Will Thomas

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Agenda Item 8.



Report of the Cabinet Member for Business Transformation & Performance

Cabinet – 21 March 2019

Quarter 3 2018/19 Performance Monitoring Report

Purpose:	To report corporate performance Quarter 3 2018/19.
Policy Framework:	<i>Delivering a Successful & Sustainable Swansea Corporate Plan 2018/22</i> <i>Sustainable Swansea – Fit for the Future</i>
Consultation:	Access to Services, Finance, Legal.
Recommendation(s):	It is recommended that: 1) the performance results are noted and reviewed to help inform executive decisions on resource allocation and, where relevant, corrective actions to manage and improve performance and efficiency in delivering national and local priorities.
Report Author:	Richard Rowlands
Finance Officer:	Paul Roach
Legal Officer:	Debbie Smith
Access to Services Officer:	Rhian Millar

1.0 Introduction

- 1.1 This report presents the performance results for Quarter 3 2018/19 delivering the Council's Well-being Objectives (priorities) described in the Corporate Plan 2018/22 *Delivering a Successful & Sustainable Swansea*.
- 1.2 The outturn presented in the performance tables (Appendix A) incorporates an overview of performance that needs to be considered alongside the current financial situation of the Council.
- 1.3 The financial resources required to achieve the specified performance levels in 2018/19 have been provided in the approved budget. As part of the work on *Sustainable Swansea – Fit for the future* there will be an increased focus on understanding the level of activity and outcomes that

are achieved for the budget allocated so that choices can be made about relative priorities.

2.0 Performance and Improvement

- 2.1 Performance is judged using the results measured by Corporate Plan performance indicators compared to agreed targets.
- 2.2 Improvement is measured by comparing the results of Corporate Plan performance indicators against the results from the same period last year where comparison is possible.
- 2.3 It is important to point out that each of the corporate priorities cannot be seen in isolation from each other. Each priority both affects and is affected by the others. For example, Improving Education and Skills is both important to our efforts to tackle poverty and improve the economy. For this reason, many of the performance indicators allocated to measuring one priority can also be used to show progress meeting other priorities.

3.0 Outturn

- 3.1 The Corporate Plan performance indicators measure progress meeting the following key priorities:
 - i) Safeguarding people from harm.
 - ii) Improving education and skills.
 - iii) Transforming our economy & infrastructure.
 - iv) Tackling poverty.
 - v) Transformation & future Council development.
- 3.2 The outturn for Quarter 3 2018/19 shows that **24 out of 42 (57%)** Corporate Plan performance indicators (that had targets and where there was data) met their targets. **13 out of 38 (34%)** comparable Corporate Plan performance indicators also showed improvement compared to Quarter 3 2017/18.
- 3.3 The performance tables in Appendix A also set out an overview of performance for each Corporate Plan priority provided by Directors and Heads of Service who are the responsible leads; these overviews are set out in para 4.0.

4.0 Context: Overviews of Performance in Quarter 3 2018/19

- 4.0.1 The following overviews provided by responsible departments describe the context to the performance meeting the Council's key priorities as at the Quarter 3 2018/19.

- 4.1 *Safeguarding people from harm*
- 4.1.1 Whilst the increase in the number of children becoming looked after is consistent with national trends, it does indicate the importance of the Council redoubling its efforts to ensure that preventative support to children and families is properly integrated, targeted and purposeful. The 2019/20 transformation proposals for children services and poverty and prevention are all built around this strategic priority.
- 4.1.2 Likewise in adult services, increased numbers of delayed transfers of care from hospital into the community are a reflection of insufficient capacity within the care sector. The Council cannot address these systemic challenges except through improved integration of health and care and close working with the third and independent sector. This will likely culminate in the creation of a hospital to home recovery service in 2019/20.
- 4.1.3 The reported deterioration in meeting performance against DOLs timescales masks a massive improvement in reducing the overall backlog. Reducing the backlog was the key strategic objective for this year.
- 4.1.4 Performance in relation to timescales for adult safeguarding shows an unexpected deterioration. This requires further investigation as it is unclear whether changes to process have led to an actual deterioration in performance or erroneous reporting.
- 4.1.5 Despite the challenging context of high levels of demand overall and obvious pressures in the system as highlighted above, the Council's safeguarding arrangements remain robust.
- 4.2 *Improving education & skills*
- 4.2.1 A draft white paper on curriculum reform in Wales will be available for consultation in April 2019 where well-being, Welsh, employability skills, digital competence skills, science and technology feature strongly. Schools are preparing themselves by focussing on teaching methods and engaging with the 12 curriculum pioneer schools in Swansea.
- 4.2.2 Verified external examination performance demonstrates that Swansea continues to do well in comparison to other local authorities since the introduction of new qualifications in Wales. New science GCSEs examined for the first time in 2018 mean that improvements are required next year. Vulnerable groups of learners do not perform as well since the introduction of ambitious examination specifications. Re-integration rates of EOTAS pupils appear positive. Literacy and numeracy test results are no longer used as performance measures by Estyn and Welsh Government. They are seen as diagnostic tools for schools.
- 4.2.3 A digital strategy is developing well between schools and the local authority to focus on infrastructure and pupils' skills development. Better

links have been forged within the Swansea Skills Partnership and in Quarter 4 an action plan will be created to focus on joint objectives.

- 4.2.4 Attendance has been affected by illness during the autumn term. However, the challenge on improving attendance continues. Exclusion rates have increased during the Q3 reporting period.
- 4.2.5 Schools have been evaluated to identify their capacity to self-improve with a focus on leadership and teaching. For the first time in five years, the majority of primary schools are evaluated as highly effective and for secondary schools, capacity to self-improve is at its highest in five years. Peer reviews between schools are increasing. New professional standards are starting to embed within schools. Swansea is well-placed to continue with strong inter-school partnerships to improve outcomes.
- 4.2.6 Support to develop looked after children in education is likely to be devolved to schools in the medium term.
- 4.2.7 Partnership working between schools is supported well through a conference to highlight best practice from within Swansea and an English local authority.
- 4.2.8 A new junior apprenticeships pilot was agreed to allow 14-16 year olds the opportunity of high status learning with provision from the local further education college.

4.3 *Transforming our economy and infrastructure*

- 4.3.1 Beyond Bricks & Mortar in their contracts is also above target, ensuring that local labour market and organisations benefit from the investment taking place. As reported previously, there is a transition underway between the regeneration programmes - "Vibrant & Viable Places" to "Targeted Regeneration Investment" and a number of schemes have now been identified to deliver commercial floor space and residential units in the business plan going forward. In addition, several schemes under the "Building for the Future" programme are also progressing through business plan stages. These are privately-owned buildings and ensuring sufficient progress in the coming weeks is essential to securing any future grant award.
- 4.3.2 Turning to the major regeneration priorities, the procurement of the primary contractor for Digital Square & Arena is now complete and works are well underway to complete RIBA stage 4. Procurement of discreet works packages for sub-contractors and a start on site is envisaged in the coming weeks subject to confirmation of City Deal funding. In addition, "Meet the Buyer" events are being organised to ensure the local supply chain is sighted on this major business opportunity. The Kingsway infrastructure project continues to make progress on site and the multi-disciplinary consultants appointed for the Employment Hub building have carried out an initial review of design proposals. A digital services consultant has also been appointed to advise on the digital technology aspects of the project. The Council has also led the submission of a

regional bid to the Department for Digital, Culture, Media and Sport for digital infrastructure under the Local Full Fibre Network Project. A decision will be made within weeks.

- 4.3.3 The Council has now received the Planning Inspector's final report regarding the Local Development Plan. The changes to the plan are now being incorporated and the LDP will now be recommended for adoption at Council in February. Work also continues to progress other key objectives to transform our Economy & Infrastructure, such as Hafod Copperworks Powerhouse Redevelopment Project, and the tender process to appoint the development manager for the Castle Square project is also nearing completion. The Wind Street feasibility study is now complete and options will be reported to Cabinet in Quarter 4.
- 4.3.4 Work is continuing on this year's Capital Programme to improve Council properties up to the Welsh Housing Quality Standard. The WHQS programme has delivered a range of improvements including new roofs, kitchens, bathrooms, heating and electrical systems as well as sprinkler systems in high-rise blocks and sheltered complexes. The second phase of the More Homes project is underway with development commencing at a further 2 sites at Parc Y Helyg and Colliers Way Phase Two. 34 new homes will be built as Homes as Power Stations due to a £1.5m Innovative Housing Programme grant from the Welsh Government. The homes will have innovative features such as solar panels and battery-powered energy. 2 family homes are also being developed in West Cross as part of a refurbishment of a former social services building.
- 4.3.5 The beginning of the Quarter included a number of well-attended events and collaborations, including the annual Fireworks display and Swansea being one of several locations nationally to host Danny Boyle's Pages of the Sea installation, for Armistice Day/ Remembrance Sunday, as part of the 14-18 centenary. A number of high profile exhibitions attracted visitors from outside the area, including an exclusive exhibition by Sir Peter Blake and the Swansea Open at the Glynn Vivian Art Gallery. From its first opening performance mid-December, this year's Pantomime at the Grand Theatre attracted over 40,000 to the city centre. The installation of the new Spectrix box office marketing system at the theatre is now operational and will help us capture our visitor data, which we can use to target market seasonal offers, including for the museum and the Glynn Vivian Art Gallery.

4.4 *Tackling Poverty*

- 4.4.1 The performance indicators demonstrate that the vast majority of targets have been achieved this quarter, supporting the wider aims and objectives contained within the Tackling Poverty Strategy. The exceptions are performance around employment and training, due to the Christmas period when we saw a reduction in recruitment in many sectors. We anticipate we will show measurable improvement in these areas by the end of the next Quarter. This has included:

- Making progress on objectives in the Tackling Poverty Strategy, through monitoring its corporate outcomes, which is enabling us to see how all departments are contributing to this goal.
 - Working with our Health partners to ensure that, through our Early Years Strategy, children in their early years and at Foundation Phase achieve their expected language, emotional, social and cognitive development and are ready for learning and for school.
 - Through our Youth Progression Framework, ensuring that young people are able to access employment, education or training after reaching 16 years of age.
 - Taking a whole Council 'Team Swansea' approach to helping to address the impacts of Welfare reform, such as supporting people to claim the full benefits they are entitled to so that they are able to maximise their income.
- 4.4.2 We continue to ensure that benefits are processed quickly and that people access the full benefits they are entitled to through appeals work carried out through the Welfare Rights Team. We have also made support available at our housing offices, libraries and Swansea Working venues throughout the city to help people make their claims for Universal Credit, whilst accessing debt advice, budgeting support, skills development and help to find work.
- 4.4.3 Our approved Homelessness Strategy has a key focus on prevention and helping our citizens to maintain their tenancies and continues to be supported through our measures to minimise the length of time spent in B&B accommodation. In support of this, the Council is continuing to build new Council homes in order to provide affordable housing and meet housing need. Our research with Policy in Practice is enabling joint working across departments to minimise the impact of Welfare Reform, enabling more proactive working around reducing debt, supporting personal progression and hopefully in time reducing instances of homelessness.
- 4.4.4 We are exploring creating our own energy venture, which if successful will provide low-cost energy to homes helping to tackle high domestic fuel bills and fuel poverty. In addition, we continue to support tackling climate change and help eradicate fuel poverty and boost economic development through the ARBED scheme and energy efficiency measures in social housing; we continue to build new energy efficient Council homes to help tackle fuel poverty and improve well-being
- 4.4.5 Concluded our exploration of tax relief and support for food bank locations and encourage businesses to reduce food waste by supplying goods to local food banks, whilst exploring sustainable options for reducing food poverty. Our work to maximise benefits, alongside employability support through Swansea Working provides support here.
- 4.4.6 We have successfully rolled out our offering of 30 hours of free childcare in conjunction with the Welsh Government across the whole of Swansea.

We are currently investigating how this can be used as an incentive to help families in Swansea find work.

4.5 *Transformation & future Council development*

4.5.1 During Quarter 3 the Council began consultation on the new budget for 2019-20 and completed the strategic review of the Sustainable Swansea - Fit for the Future programme. Although the programme is closely aligned to the budget and Medium Term Financial Plan (MTFP), it has a much wider strategic scope encompassing areas such as organisational change and digital transformation.

4.5.2 In line with Transformation & Future Council well-being objectives in the Corporate Plan, work on key Council strategies continues, aiming to complete by the end of March ready for implementation in the new financial year. These include:

- Digital Strategy - Updated and revised from the 2015 strategy and including both the Council and Digital City aspirations
- Digital Inclusion Strategy - Linking with the Welsh Government's Digital Inclusion Framework so that more people can access support online
- Co-Production Strategy - Defining the Council's approach to designing services alongside communities.

4.5.3 The Transformation & Future Council Policy Development Committee (PDC) has developed a new approach to contract procedure rules in ways which will enable more local businesses to bid for Council contracts.

4.5.4 The Council has been strengthening its approach to equalities during Quarter 3. The new Equalities Champions across the Council received their first training session with more to follow in the coming months. The Scrutiny Inquiry into Equalities is also well underway and scheduled to report findings in Quarter 4.

4.5.5 A review of Welsh Translation services is underway, reviewing ways of working. This is a shared service with Neath & Port Talbot Council.

4.5.6 The final phase of the Business Support implementation is being delivered through Directorate hubs. This phase of work will improve efficiency and consistency of support roles and functions across the Council.

4.5.7 As shown in the indicators above, performance is improving around the digital channels with online forms and payments increasing. This is encouraging given all the work towards 'digital first' objectives. New technology is being trialled in the Council Chamber to enable e-voting and webcasting with the aim of this being available in Quarter 4.

- 4.5.8 The delivery of savings shown in the FINA6 indicator is declining. Performance is monitored by both the Corporate Management Team and Cabinet and remedial actions have been put in place to address both the in-year position and 2019-20. Whilst savings will be delivered, the challenge has been timing given the complexity of some service changes.
- 4.5.9 Sickness days per employee is increasing as shown in the CHR002 indicator. More training, support and data analysis is being provided to managers alongside piloting new ways of working for employees in order to address performance in this area.

5.0 Considerations

- 5.1 When making comparisons between previous quarters and 2017/18, the following should be considered:
- 5.1.1 The nature and number of some performance indicators (PIs) has changed between these two periods and therefore direct comparisons may not always be appropriate.
- 5.1.2 Many of the performance measures are new and definitions may need further refinement.
- 5.1.3 Some targets for new performance indicators are still being baselined.
- 5.1.4 Some data will be enhanced and improved to be more robust as data collection methods are developed and / or refined by services over the coming quarters.
- 5.1.5 The results do not always account for changes in resources and workload during that period (although details can be seen in the numerator and denominator information and in the comments column of the data tables attached to this report).
- 5.1.6 There may be changes to the numerator and denominator information that may affect the trends by showing a decline while the volume of work has increased.

6.0 Equality & Engagement Implications

- 6.1 This report has no direct equality and engagement implications itself although the data reported may form part of the information that leads to a service screening for and undertaking an EIA as required.

7.0 Financial Implications

- 7.1 In the current and anticipated financial environment further discussion and consideration will be required around priorities and target setting for performance improvement as part of *Sustainable Swansea – fit for the future*.

8.0 Legal Implications

8.1 There are no legal implications associated with this report.

Background Papers: None.

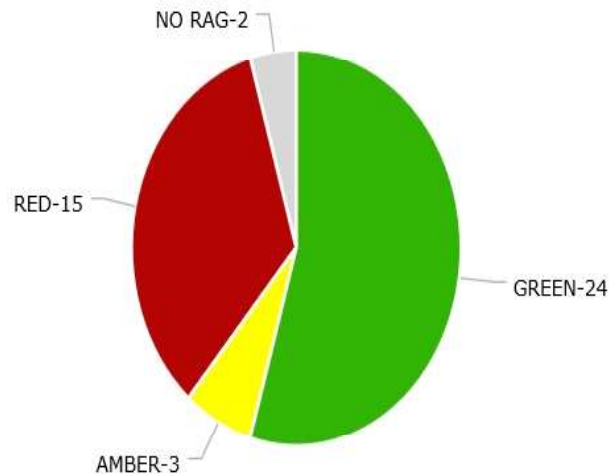
Appendices: Appendix A – Corporate Performance Management Report Q3 2018/2019

Corporate Performance Management Report Q3 2018/2019

JS chart by amCharts

Performance against Target - Overall Council Summary

2018/2019 Quarter 3



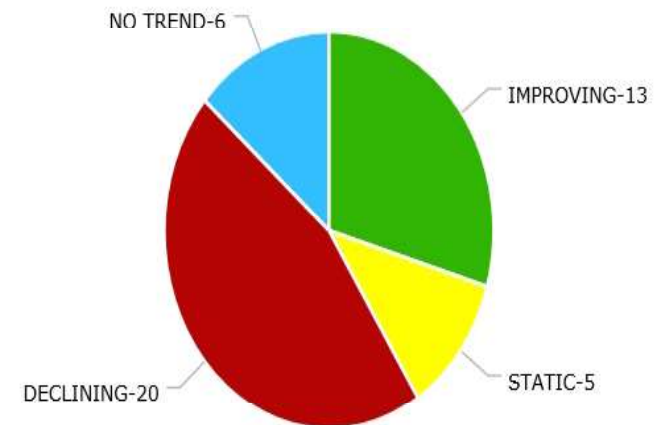
Performance against the target:

GREEN	Met or exceeded target
AMBER	Missed target (less than 5%)
RED	Missed target (more than 5%)
NO RAG	No target set

JS chart by amCharts

Performance compared to same Period of previous year

2018/2019 Quarter 3



Performance compared to the same period of the previous year:

IMPROVING	Better performance
STATIC	Same performance
DECLINING	Worse performance
NO TREND	New indicator - No historical comparison

Whilst the increase in the number of children becoming looked after is consistent with national trends, it does indicate the importance of the Council redoubling its efforts to ensure that preventative support to children and families is properly integrated, targeted and purposeful. The 2019/20 transformation proposals for children services and poverty and prevention are all built around this strategic priority.

Likewise in adult services, increased numbers of delayed transfers of care from hospital into the community are a reflection of insufficient capacity within the care sector. The Council cannot address these systemic challenges except through improved integration of health and care and close working with the third and independent sector. This will likely culminate in the creation of a hospital to home recovery service in 2019/20.

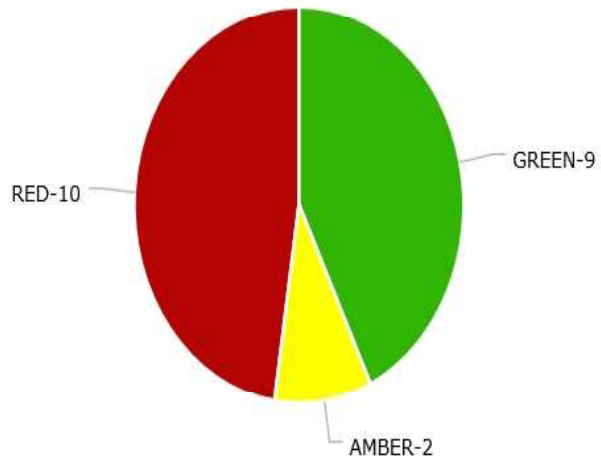
The reported deterioration in meeting performance against DOLs timescales masks a massive improvement in reducing the overall backlog. Reducing the backlog was the key strategic objective for this year.

Performance in relation to timescales for adult safeguarding shows an unexpected deterioration. This requires further investigation as it is unclear whether changes to process have led to an actual deterioration in performance or erroneous reporting.

Despite the challenging context of high levels of demand overall and obvious pressures in the system as highlighted above, the Council's safeguarding arrangements remain robust.

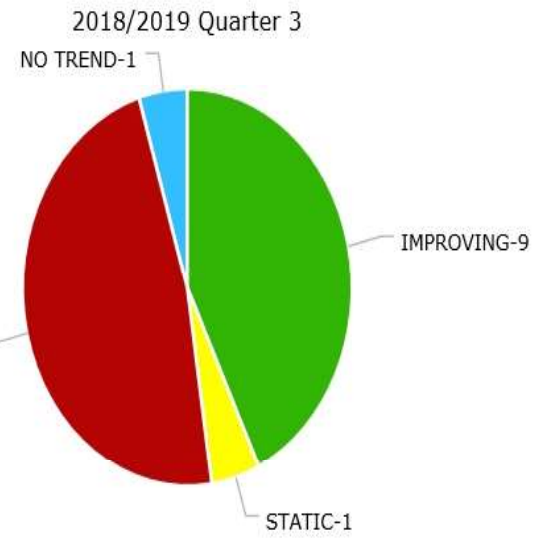
JS chart by amCharts

Performance against Target
2018/2019 Quarter 3



JS chart by amCharts

Performance compared to same Period of previous year



Safeguarding 17-22

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
AS10 ↑ Percentage of annual reviews of care and support plans completed in adult services	RAG		GREEN	GREEN	
	Result		70.10%	70.17%	
	Target		65.00%	70.00%	
	Trend	No Data	IMPROVING	IMPROVING	
	Num	3997.00	4198.00	4115.00	-1.98%
	Den	6248.00	5989.00	5864.00	-2.09%
AS11 ↓ Rate of adults aged 65+ receiving care and support to meet their well-being needs per 1,000 population	RAG		GREEN	GREEN	
	Result		95.62	82.06	
	Target		101.00	100.00	
	Trend	No Data	IMPROVING	IMPROVING	
	Num	4569.00	4515.00	3902.00	-13.58%
	Den	47220.00	47220.00	47549.00	

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Safeguarding 17-22

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
<p>AS12 ↘</p> <p>Rate of adults aged 18-64 receiving care and support to meet their well-being needs per 1,000 population</p> <p>AS12 LOW is Good</p>	RAG		RED	GREEN	
	Result		12.15	9.74	
	Target		9.00	13.00	
	Trend	No Data	IMPROVING	IMPROVING	
	Num	1955.00	1822.00	1467.00 -19.48%	
	Den	149958.00	149958.00	150659.00	
<p>AS13 ↗</p> <p>Number of carers (aged 18+) who received a carer's assessment in their own right during the year</p> <p>AS13 HIGH is Good</p>	RAG		GREEN	RED	Whilst performance in Quarter 3 is slightly below target, cumulative performance for 2018/19 continues towards meeting the target of 700 in the year..
	Result		175.00	164.00	
	Target		150.00	175.00	
	Trend	No Data	IMPROVING	DECLINING	
	Num	0.13	175.00	164.00 -6.29%	
	Den	1.00	1.00		

Safeguarding 17-22

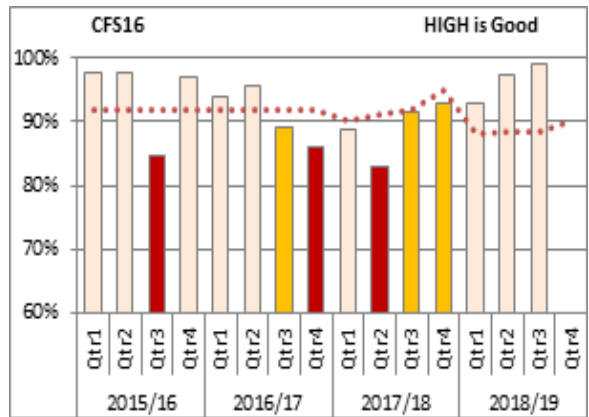
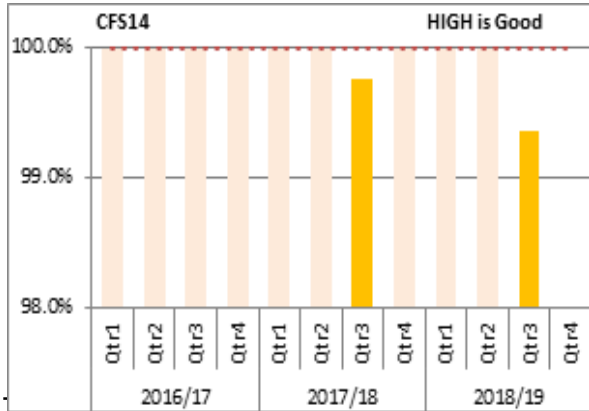
Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019	
<p>AS14 ↑</p> <p>The percentage of people who have completed reablement who were receiving less care or no care 6 months after the end of reablement.</p>	RAG		GREEN	GREEN		
	Result		80.95%	98.53%		
	Target		75.00%	80.00%		
	Trend	No Data	IMPROVING	IMPROVING		
	Num	113.00	340.00	134.00	-60.59%	
	Den	160.00	420.00	136.00	-67.62%	
<p>AS15 ↑</p> <p>The percentage of statutory performance indicators where performance is maintained or improving</p>	RAG		RED	RED	Whilst only the 2 statutory measures relating to reablement have improved this quarter, the majority of other statutory indicators have only just missed target.	
	Result		57.00%	28.57%		
	Target		85.00%	70.00%		
	Trend	No Data	IMPROVING	DECLINING		
	Num	2.00	4.00	2.00		-50%
	Den	6.00	7.00	7.00		

Safeguarding 17-22

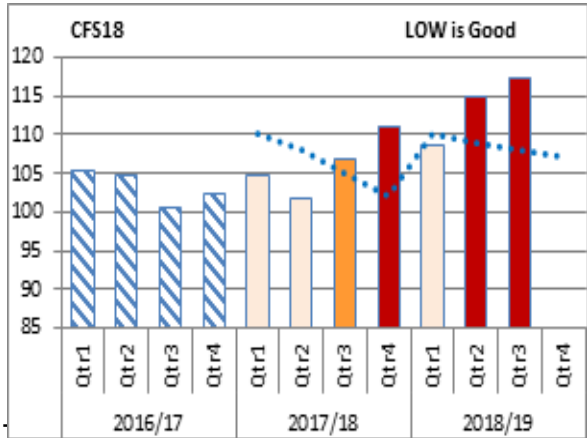
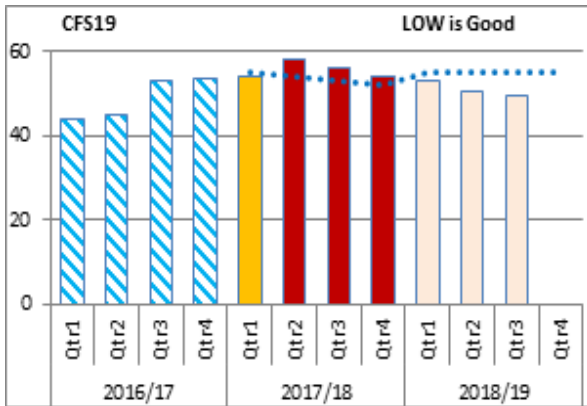
Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019	
AS8 <p>Percentage of adult protection referrals to Adult Services where decision is taken within 24 hours (i.e. 1 working day)</p>	RAG	RED	AMBER	RED	This is a concerning deterioration in reported performance which the adult services principal officer lead for safeguarding is investigating. Any recommendations for improvement to processes will be immediately implemented.	
	Result	72.92%	62.93%	43.22%		
	Target	80.00%	65.00%	65.00%		
	Trend	No Data	DECLINING	DECLINING		
	Num	237.00	202.00	118.00		-41.58%
	Den	325.00	321.00	273.00		-14.95%
AS9 <p>The percentage of Deprivation of Liberty Safeguarding (DoLS) Assessments completed in 21 days or less.</p>	RAG		AMBER	RED	Since the creation of the DoLS Team we have reduced the backlog from 331 at the high point to 75 today. We are carrying out further investigations to better understand why this radically improved performance does not improve the performance of timely assessments being carried out.	
	Result		58.40%	49.70%		
	Target		60.00%	70.00%		
	Trend	No Data	DECLINING	DECLINING		
	Num	266.00	270.00	333.00		23.33%
	Den	430.00	462.00	670.00		45.02%

Safeguarding 17-22

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019	
CFS14 ↑ The percentage of decisions about a referral for care and support received by Child and Family Services which are taken within 24 hrs from receipt of referral.	RAG	GREEN	AMBER	AMBER	Two referrals were flagged as not having a decision made within 24 hrs. Both these referrals were appropriately actioned, but the decision was not recorded on the referral in a timely manner. Referrals are closely monitored at the front door. The cause of this has been identified and steps have been taken to minimise the likelihood of re-occurrence. It is pleasing that performance in this area remains high despite the changes to the front door and the development of an integrated hub.	
	Result	100.00%	99.76%	99.35%		
	Target	100.00%	100.00%	100.00%		
	Trend	STATIC	DECLINING	DECLINING		
	Num	408.00	410.00	308.00		-24.88%
	Den	408.00	411.00	310.00		-24.57%
CFS16 ↑ The percentage of initial core group meetings held within 10 working days of the initial child protection conference.	RAG	AMBER	AMBER	GREEN		
	Result	89.23%	91.43%	98.97%		
	Target	92.00%	92.00%	90.00%		
	Trend	IMPROVING	IMPROVING	IMPROVING		
	Num	116.00	96.00	96.00		0%
	Den	130.00	105.00	97.00		-7.62%



Safeguarding 17-22

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
<p>CFS18 ↓</p> <p>The number of children looked after per 10,000 of the 0-17 Swansea population.</p> 	RAG		AMBER	RED	<p>The rising LAC population is not a factor limited to Swansea. The UK as a whole has seen a dramatic rise in the number of children looked after. The reasons behind the rise are complex, and include substance abuse, severe and prolonged domestic abuse, neglect and parental mental health. There is a direct correlation between poverty and deprivation and children needing removal from the family home. Swansea will always explore all options before resorting to removal of the child.</p>
	Result		106.75	117.41	
	Target		105.00	107.00	
	Trend	No Data	DECLINING	DECLINING	
	Num	473.00	502.00	555.00 10.56%	
	Den	47026.00	47026.00	47272.00	
<p>CFS19 ↓</p> <p>The number of children on the Local Authority's Child Protection Register per 10,000 of the 0-17 Swansea population.</p> 	RAG		RED	GREEN	
	Result		56.35	49.71	
	Target		53.00	55.00	
	Trend	No Data	DECLINING	IMPROVING	
	Num	250.00	265.00	235.00 -11.32%	
	Den	47026.00	47026.00	47272.00	

Safeguarding 17-22

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
<p>CFS20 ↘</p> <p>The number of children in need of care and support per 10,000 of the 0-17 Swansea population.</p> <p>CFS20 LOW is Good</p>	<p>RAG</p> <p>Result</p> <p>Target</p> <p>Trend</p> <p>Num</p> <p>Den</p>		<p>AMBER</p> <p>211.59</p> <p>210.00</p> <p>IMPROVING</p> <p>995.00</p> <p>47026.00</p>	<p>GREEN</p> <p>170.29</p> <p>205.00</p> <p>IMPROVING</p> <p>805.00 -19.1%</p> <p>47272.00</p>	
<p>CFS21 ↑</p> <p>Percentage of all statutory indicators for Child & Family Services that have maintained or improved performance from the previous year.</p> <p>CF521 HIGH is Good</p>	<p>RAG</p> <p>Result</p> <p>Target</p> <p>Trend</p> <p>Num</p> <p>Den</p>		<p>RED</p> <p>20.00%</p> <p>80.00%</p> <p>No Data</p> <p>1.00</p> <p>5.00</p>	<p>RED</p> <p>20.00%</p> <p>80.00%</p> <p>STATIC</p> <p>1.00 0%</p> <p>5.00</p>	<p>Whilst there has been a decrease in performance from the 2017/18 financial year, the decrease is slight. In most cases performance has improved over the current year in comparison to Q1 results and although currently lower than last year's result, there is still some opportunity to improve in Q4.</p>

Safeguarding 17-22

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
Measure 18 ↑ The percentage of adult protection enquiries completed within 7 days	RAG	AMBER	GREEN	RED	This deterioration in reported performance appears to be linked to resource pressures caused by sickness absence in one particular service area. Team managers are prioritising workload to mitigate the impact. The principal officer lead for safeguarding is monitoring that safe practice is being maintained and any recommendations to improve process will be immediately implemented.
	Result	93.54%	95.64%	84.25%	
Target	95.00%	90.00%	90.00%		
Trend	No Data	IMPROVING	DECLINING		
Num	304.00	307.00	230.00 -25.08%		
Den	325.00	321.00	273.00 -14.95%		
Measure 19 (PAM025) ↓ The rate of delayed transfers of care for social care reasons per 1,000 population aged 75 or over	RAG	GREEN	RED	RED	
	Result	1.71	4.84	7.38	
Target	6.00	3.00	4.50		
Trend	No Data	DECLINING	DECLINING		
Num	37.00	105.00	162.00 54.29%		
Den	21672.00	21672.00	21956.00		

Safeguarding 17-22

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019																				
<p>Measure 24 (PAM028) ↑</p> <p>The percentage of assessments completed for children within statutory timescales</p> <p>Measure 24 HIGH is Good</p> <table border="1"> <caption>Measure 24 Data</caption> <thead> <tr> <th>Year</th> <th>Qtr1</th> <th>Qtr2</th> <th>Qtr3</th> <th>Qtr4</th> </tr> </thead> <tbody> <tr> <td>2016/17</td> <td>95%</td> <td>80%</td> <td>78%</td> <td>80%</td> </tr> <tr> <td>2017/18</td> <td>75%</td> <td>70%</td> <td>70%</td> <td>75%</td> </tr> <tr> <td>2018/19</td> <td>85%</td> <td>72%</td> <td>72%</td> <td>-</td> </tr> </tbody> </table>	Year	Qtr1	Qtr2	Qtr3	Qtr4	2016/17	95%	80%	78%	80%	2017/18	75%	70%	70%	75%	2018/19	85%	72%	72%	-	RAG		RED	RED	<p>We are experiencing some difficulty in recording and accurately capturing performance for assessments. Whilst we expect to see an improvement in Q4 we are unlikely to reach our performance target this year. Further work is required to ensure that managers use the available tools to track progress on assessments underway to try to ensure compliance with timescales.</p>
Year	Qtr1	Qtr2	Qtr3	Qtr4																					
2016/17	95%	80%	78%	80%																					
2017/18	75%	70%	70%	75%																					
2018/19	85%	72%	72%	-																					
Result			69.53%	73.00%																					
Target			89.00%	90.00%																					
Trend	No Data		DECLINING	IMPROVING																					
Num	296.00		194.00	173.00 -10.82%																					
Den	363.00		279.00	237.00 -15.05%																					
<p>Measure 28 ↓</p> <p>The average length of time for all children who were on the Child Protection Register (CPR) during the year</p> <p>Measure 28 HIGH is Good</p> <table border="1"> <caption>Measure 28 Data</caption> <thead> <tr> <th>Year</th> <th>Qtr1</th> <th>Qtr2</th> <th>Qtr3</th> <th>Qtr4</th> </tr> </thead> <tbody> <tr> <td>2016/17</td> <td>240</td> <td>245</td> <td>235</td> <td>215</td> </tr> <tr> <td>2017/18</td> <td>200</td> <td>190</td> <td>210</td> <td>230</td> </tr> <tr> <td>2018/19</td> <td>235</td> <td>220</td> <td>235</td> <td>-</td> </tr> </tbody> </table>	Year	Qtr1	Qtr2	Qtr3	Qtr4	2016/17	240	245	235	215	2017/18	200	190	210	230	2018/19	235	220	235	-	RAG	GREEN	GREEN	GREEN	<p>Performance improving throughout 2018/19. Within acceptable range of performance.</p>
Year	Qtr1	Qtr2	Qtr3	Qtr4																					
2016/17	240	245	235	215																					
2017/18	200	190	210	230																					
2018/19	235	220	235	-																					
Result			236.00	210.66	234.00																				
Target			280.00	300.00	300.00																				
Trend	No Data		IMPROVING	DECLINING																					
Num	18408.00		22962.00	21321.00 -7.15%																					
Den	78.00		109.00	91.00 -16.51%																					

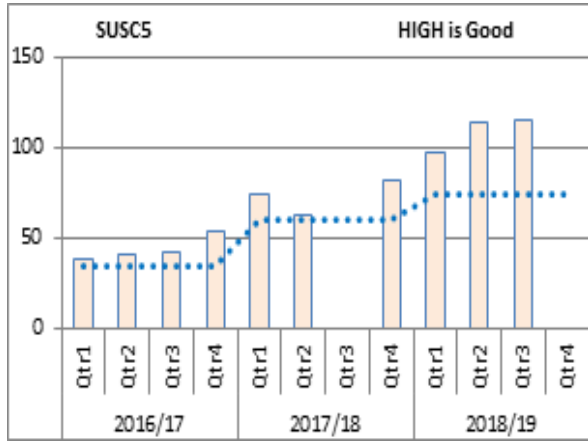
Safeguarding 17-22

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
SAFE27	RAG		RED	RED	38 staff completed both adult and child modules: 42 staff completed one module: 0 staff completed face to face training. Results from e-learning and Oracle.
Total number of staff who have completed the corporate mandatory safeguarding awareness training (excludes school based staff)	Result		183.00	80.00	
	Target		250.00	175.00	
	Trend		No Data	DECLINING	
	Num		183.00	80.00 -56.28%	
	Den				
SAFE8b	RAG		GREEN	AMBER	These figures have improved and we will continue to work with Democratic Services to support completion of this target.
Percentage of Elected Members who have received training in safeguarding vulnerable people	Result		81.94%	94.40%	
	Target		75.00%	95.00%	
	Trend		No Data	IMPROVING	
	Num		59.00	68.00 15.25%	
	Den		72.00	72.00	

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
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SUSC5 [↑](#)

Number of new requests for local area co-ordination



RAG	GREEN		GREEN
Result	42.00		116.00
Target	35.00		75.00
Trend	IMPROVING	No Data	No Data
Num	42.00		116.00
Den			

A draft white paper on curriculum reform in Wales will be available for consultation in April 2019 where well-being, Welsh, employability skills, digital competence skills, science and technology feature strongly. Schools are preparing themselves by focussing on teaching methods and engaging with the 12 curriculum pioneer schools in Swansea.

Verified external examination performance demonstrates that Swansea continues to do well in comparison to other local authorities since the introduction of new qualifications in Wales. New science GCSEs examined for the first time in 2018 mean that improvements are required next year. Vulnerable groups of learners do not perform as well since the introduction of ambitious examination specifications. Re-integration rates of EOTAS pupils appear positive. Literacy and numeracy test results are no longer used as performance measures by Estyn and Welsh Government. They are seen as diagnostic tools for schools.

A digital strategy is developing well between schools and the local authority to focus on infrastructure and pupils' skills development. Better links have been forged within the Swansea Skills Partnership and in Q4 an action plan will be created to focus on joint objectives.

Attendance has been affected by illness during the autumn term. However, the challenge on improving attendance continues. Exclusion rates have increased during the Q3 reporting period.

Schools have been evaluated to identify their capacity to self-improve with a focus on leadership and teaching. For the first time in five years, the majority of primary schools are evaluated as highly effective and for secondary schools, capacity to self-improve is at its highest in five years. Peer reviews between schools are increasing. New professional standards are starting to embed within schools. Swansea is well-placed to continue with strong inter-school partnerships to improve outcomes.

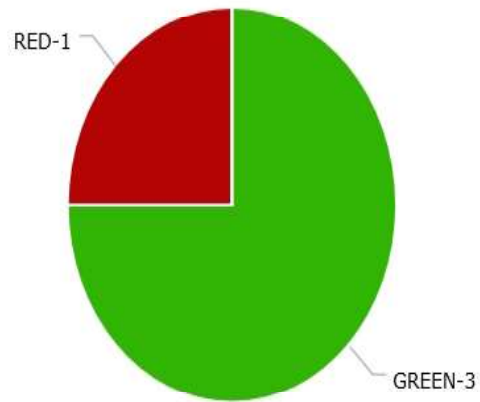
Support to develop looked after children in education is likely to be devolved to schools in the medium term.

Partnership working between schools is supported well through a conference to highlight best practice from within Swansea and an English local authority.

A new junior apprenticeships pilot was agreed to allow 14-16 year olds the opportunity of high status learning with provision from the local further education college.

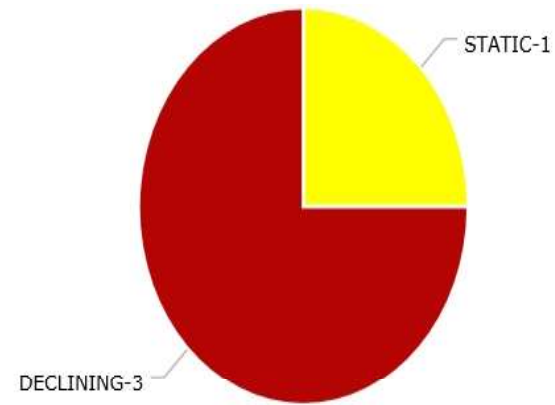
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Performance against Target
2018/2019 Quarter 3


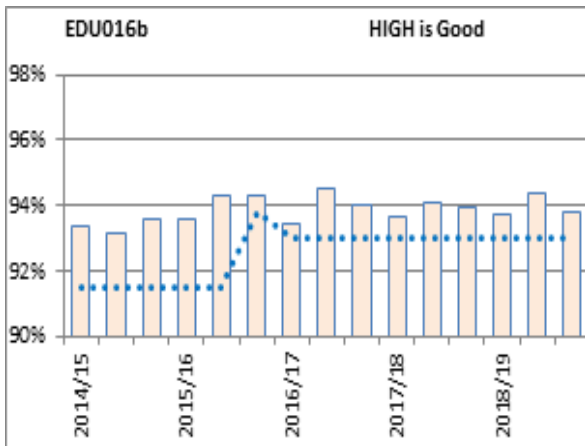

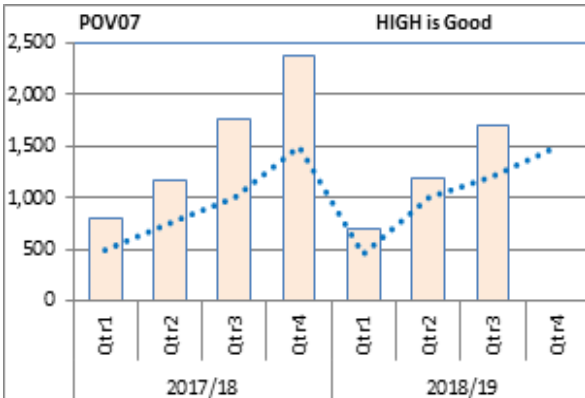


JS chart by amCharts

Performance compared to same Period of previous year
2018/2019 Quarter 3



Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
BBMA4 ↑ The number of apprenticeships or trainee starts in the Council	RAG		GREEN	RED	Targets are ambitious and budgetary constraints mean that departments are not taking on staff or trainees in the volumes anticipated.
	Result		21.00	21.00	
	Target		15.00	40.00	
	Trend	No Data	No Data	STATIC	
	Num		21.00	21.00 0%	
	Den				
EDU016a (PAM007) ↑ Percentage of pupil attendance in primary schools	RAG	GREEN	GREEN	GREEN	Attendance fell in the second half of the term due mainly to illness.
	Result	95.30%	95.14%	94.93%	
	Target	94.00%	94.00%	94.00%	
	Trend	DECLINING	DECLINING	DECLINING	
	Num	2140935.00	2274524.00	2248184.00 -1.16%	
	Den	2246473.00	2390691.00	2368188.00 -0.94%	

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
EDU016b (PAM008)  Percentage of pupil attendance in secondary schools	RAG	GREEN	GREEN	GREEN	Attendance fell in the second half of the term due mainly to illness.
	Result	94.03%	93.97%	93.80%	
	Target	93.00%	93.00%	93.00%	
	Trend	DECLINING	DECLINING	DECLINING	
	Num	1566509.00	1652108.00	1701538.00	2.99%
	Den	1665933.00	1758075.00	1814083.00	3.19%
POV07  The number of training and employment person weeks created by BBM for unemployed and economically inactive.	RAG		GREEN	GREEN	Many of the new contracts this year have been small and have not generated as many person weeks as last year.
	Result		1755.00	1699.00	
	Target		1000.00	1200.00	
	Trend	No Data	No Data	DECLINING	
	Num		1755.00	1699.00	-3.19%
	Den				

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Beyond Bricks & Mortar in their contracts is also above target, ensuring that local labour market and organisations benefit from the investment taking place. As reported previously, there is a transition underway between the regeneration programmes - "Vibrant & Viable Places" to "Targeted Regeneration Investment" and a number of schemes have now been identified to deliver commercial floor space and residential units in the business plan going forward. In addition, several schemes under the 'Building for the Future' programme are also progressing through business plan stages. These are privately-owned buildings and ensuring sufficient progress in the coming weeks is essential to securing any future grant award.

Turning to the major regeneration priorities, the procurement of the primary contractor for Digital Square & Arena is now complete and works are well underway to complete RIBA stage 4. Procurement of discreet works packages for sub-contractors and a start on site is envisaged in the coming weeks subject to confirmation of City Deal funding. In addition, 'Meet the Buyer' events are being organised to ensure the local supply chain is sighted on this major business opportunity. The Kingsway infrastructure project continues to make progress on site and the multi-disciplinary consultants appointed for the Employment Hub building have carried out an initial review of design proposals. A digital services consultant has also been appointed to advise on the digital technology aspects of the project. The Council has also led the submission of a regional bid to the Department for Digital, Culture, Media and Sport for digital infrastructure under the Local Full Fibre Network Project. A decision will be made within weeks.

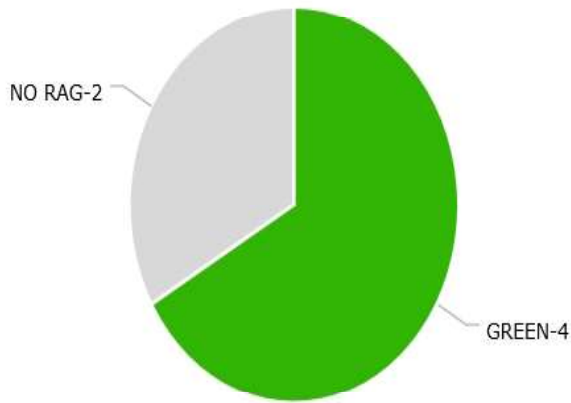
The Council has now received the Planning Inspector's final report regarding the Local Development Plan. The changes to the plan are now being incorporated and the LDP will now be recommended for adoption at Council in February. Work also continues to progress other key objectives to transform our Economy & Infrastructure, such as Hafod Copperworks Powerhouse Redevelopment Project, and the tender process to appoint the development manager for the Castle Square project is also nearing completion. The Wind Street feasibility study is now complete and options will be reported to Cabinet in Quarter 4.

Work is continuing on this year's Capital Programme to improve Council properties up to the Welsh Housing Quality Standard. The WHQS programme has delivered a range of improvements including new roofs, kitchens, bathrooms, heating and electrical systems as well as sprinkler systems in high-rise blocks and sheltered complexes. The second phase of the More Homes project is underway with development commencing at a further 2 sites at Parc Y Helyg and Colliers Way Phase Two. 34 new homes will be built as Homes as Power Stations due to a £1.5m Innovative Housing Programme grant from the Welsh Government. The homes will have innovative features such as solar panels and battery-powered energy. 2 family homes are also being developed in West Cross as part of a refurbishment of a former social services building.

The beginning of the Quarter included a number of well-attended events and collaborations, including the annual Fireworks display and Swansea being one of several locations nationally to host Danny Boyle's Pages of the Sea installation, for Armistice Day/ Remembrance Sunday, as part of the 14-18 centenary. A number of high profile exhibitions attracted visitors from outside the area, including an exclusive exhibition by Sir Peter Blake and the Swansea Open at the Glynn Vivian Art Gallery. From its first opening performance mid-December, this year's Pantomime at the Grand Theatre attracted over 40,000 to the city centre. The installation of the new Spectrix box office marketing system at the theatre is now operational and will help us capture our visitor data, which we can use to target market seasonal offers, including for the museum and the Glynn Vivian Art Gallery.

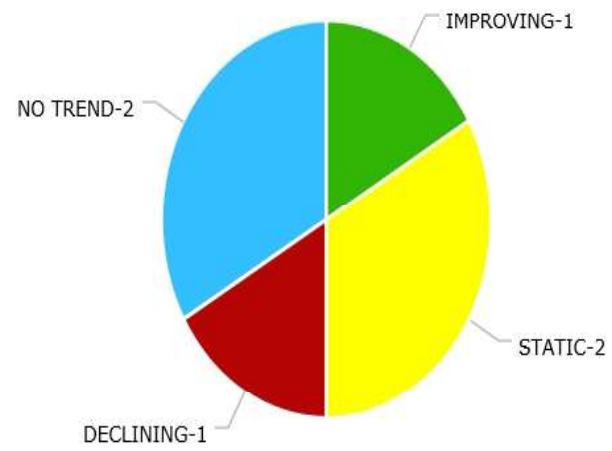
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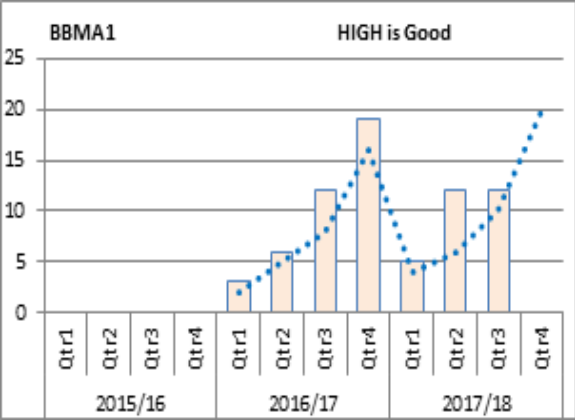

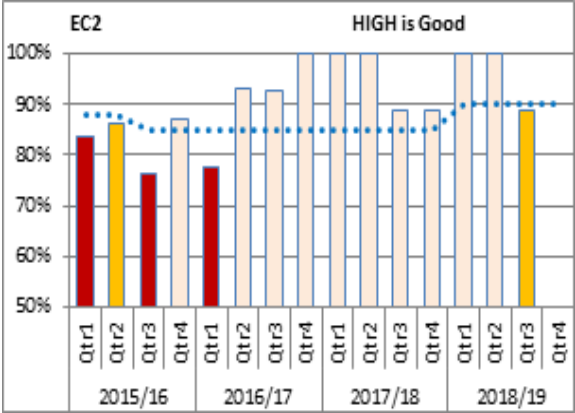
Performance against Target
2018/2019 Quarter 3





JS chart by amCharts

Performance compared to same Period of previous year
2018/2019 Quarter 3




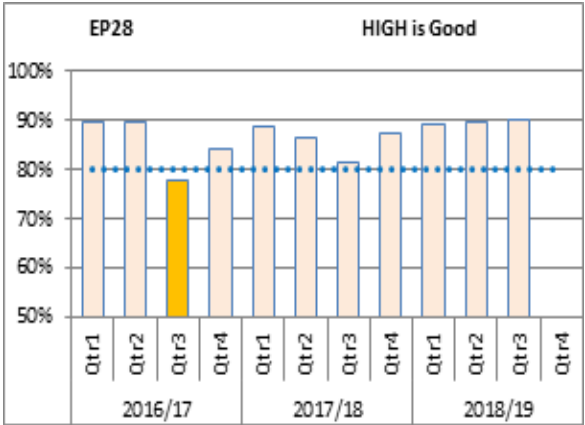
Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
BBMA1  The number of projects with social benefit clauses and Beyond Bricks & Mortar in their contracts	RAG		GREEN	GREEN	
	Result		12.00	12.00	
	Target		8.00	10.00	
	Trend	No Data	No Data	STATIC	
	Num		12.00	12.00	0%
	Den				
EC2  The Percentage of all major applications with an economic imperative that are approved	RAG	GREEN	GREEN	GREEN	One application was refused on policy grounds.
	Result	93.00%	89.00%	89.00%	
	Target	85.00%	85.00%	85.00%	
	Trend	IMPROVING	DECLINING	STATIC	
	Num	13.00	8.00	8.00	0%
	Den	14.00	9.00	9.00	0%

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Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
EC5  Amount of commercial floorspace (m²) created within the City Centre to accommodate job creation	RAG				Several schemes are now underway but due to revised funding timescales they are not expected to be completed until June 2019. Two schemes are currently on site, they are not expected to complete until after March 2019 but will ultimately deliver 446 m² between them.
	Result			0.00	
	Target				
	Trend			No Data	
	Num			0.00	
	Den				
EC6  Number of new housing units created in Swansea City Centre as a result of Targeted Regeneration Investment Programme (TRIP) funding	RAG				Several schemes are now underway but due to revised funding timescales they are not expected to be completed until June 2019. Five schemes are currently on site, they are not expected to complete until after March 2019 but will ultimately deliver 18 units between them.
	Result			0.00	
	Target				
	Trend			No Data	
	Num			0.00	
	Den				


Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
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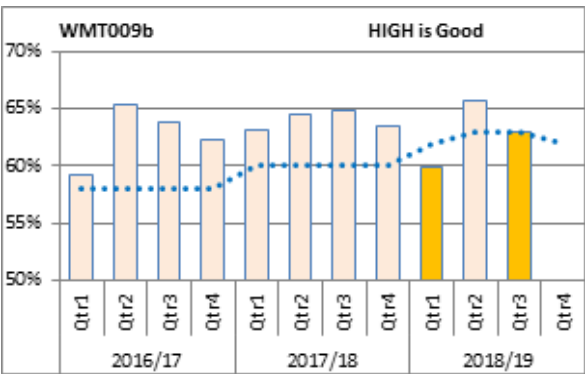
EP28 
 The percentage of all planning applications determined within 8 weeks.



RAG	AMBER	GREEN	GREEN	
Result	77.73%	81.35%	90.16%	
Target	80.00%	80.00%	80.00%	
Trend	DECLINING	IMPROVING	IMPROVING	
Num	356.00	362.00	403.00	11.33%
Den	458.00	445.00	447.00	0.45%

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WMT009b (PAM030) 
 The percentage of municipal waste collected by local authorities and prepared for reuse and/or recycled, including source segregated biowastes that are composted or treated biologically in another way



RAG	GREEN	GREEN	GREEN	
Result	63.75%	64.89%	62.88%	
Target	58.00%	60.00%	62.00%	
Trend	IMPROVING	IMPROVING	DECLINING	
Num	20241.40	18805.08	17873.00	-4.96%
Den	31751.70	28980.76	28423.00	-1.92%

Due to the time delay for WG verification, these figures relate to Qtr 2. The reduction in recycling performance year on year is due to the very dry summer reducing garden waste tonnages, and the change in the way wood recycling is assessed. The WG target for 18/19 is only 58%, however the WG target increases to 64% next year. The new initiative "Keeping Recyclables Out" which will seek a behavioural change in recycling in the home, starts on 25 Feb to exceed 64% for next year.

The performance indicators demonstrate that the vast majority of targets have been achieved this quarter, supporting the wider aims and objectives contained within the Tackling Poverty Strategy. The exceptions are performance around employment and training, due to the Christmas period when we saw a reduction in recruitment in many sectors. We anticipate we will show measurable improvement in these areas by the end of the next Quarter.

This has included:

Making progress on objectives in the Tackling Poverty Strategy, through monitoring its corporate outcomes, which is enabling us to see how all departments are contributing to this goal.

Working with our Health partners to ensure that, through our Early Years Strategy, children in their early years and at Foundation Phase achieve their expected language, emotional, social and cognitive development and are ready for learning and for school.

Through our Youth Progression Framework, ensuring that young people are able to access employment, education or training after reaching 16 years of age.

Taking a whole Council 'Team Swansea' approach to helping to address the impacts of Welfare reform, such as supporting people to claim the full benefits they are entitled to so that they are able to maximise their income. We continue to ensure that benefits are processed quickly and that people access the full benefits they are entitled to through appeals work carried out through the Welfare Rights Team. We have also made support available at our housing offices, libraries and Swansea Working venues throughout the city to help people make their claims for Universal Credit, whilst accessing debt advice, budgeting support, skills development and help to find work.

Our approved Homelessness Strategy has a key focus on prevention and helping our citizens to maintain their tenancies and continues to be supported through our measures to minimise the length of time spent in B&B accommodation. In support of this, the Council is continuing to build new Council homes in order to provide affordable housing and meet housing need. Our research with Policy in Practice is enabling joint working across departments to minimise the impact of Welfare Reform, enabling more proactive working around reducing debt, supporting personal progression and hopefully in time reducing instances of homelessness.

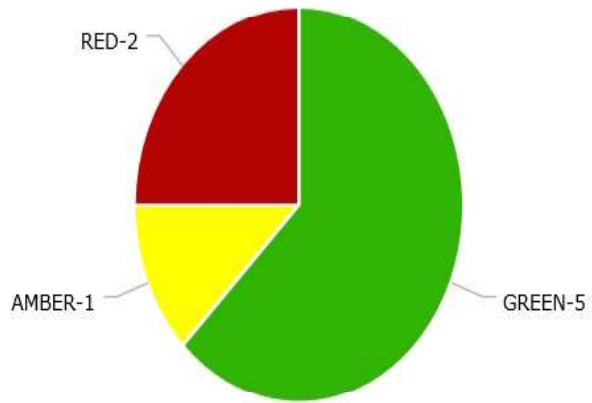
We are exploring creating our own energy venture, which if successful will provide low-cost energy to homes helping to tackle high domestic fuel bills and fuel poverty. In addition, we continue to support tackling climate change and help eradicate fuel poverty and boost economic development through the ARBED scheme and energy efficiency measures in social housing; we continue to build new energy efficient Council homes to help tackle fuel poverty and improve well-being.

Concluded our exploration of tax relief and support for food bank locations and encourage businesses to reduce food waste by supplying goods to local food banks, whilst exploring sustainable options for reducing food poverty. Our work to maximise benefits, alongside employability support through Swansea Working provides support here.

We have successfully rolled out our offering of 30 hours of free childcare in conjunction with the Welsh Government across the whole of Swansea. We are currently investigating how this can be used as an incentive to help families in Swansea find work.

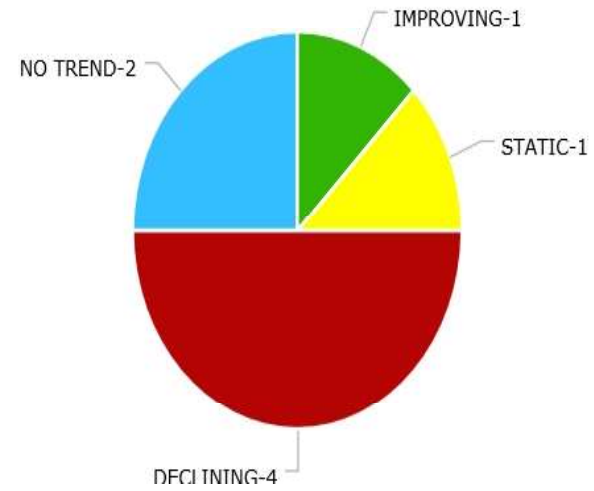
JS chart by amCharts

Performance against Target
2018/2019 Quarter 3



JS chart by amCharts

Performance compared to same Period of previous year
2018/2019 Quarter 3



Tackling Poverty 17-22

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019	
HBCT01a Housing Benefit Speed of Processing: Average time for processing new claims.	RAG	GREEN	GREEN	GREEN		
	Result	15.10	16.14	12.21		
	Target	19.00	18.00	18.00		
	Trend	IMPROVING	DECLINING	IMPROVING		
	Num	20969.00	22713.00	7337.00	-67.70%	
	Den	1389.00	1407.00	601.00	-57.29%	
HBCT01b Housing Benefit Speed of Processing: Average time for processing notifications of change in circumstances.	RAG	GREEN	GREEN	GREEN	The decrease in overall performance is as expected due to complications in CTR/HB administrations caused by the rollout of Universal Credit and reductions in staff resources.	
	Result	4.45	4.32	5.57		
	Target	7.00	6.00	6.00		
	Trend	IMPROVING	IMPROVING	DECLINING		
	Num	47051.00	38202.00	36839.00		-3.57%
	Den	10566.00	8839.00	6614.00		-25.17%

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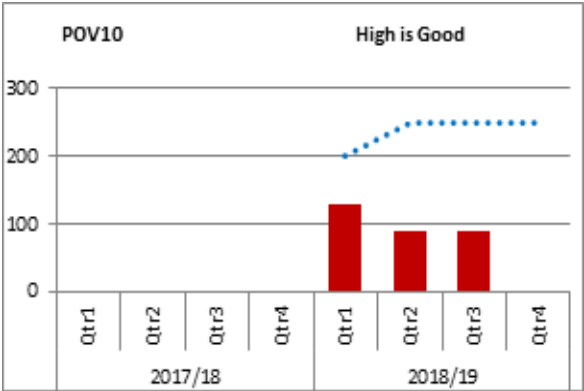

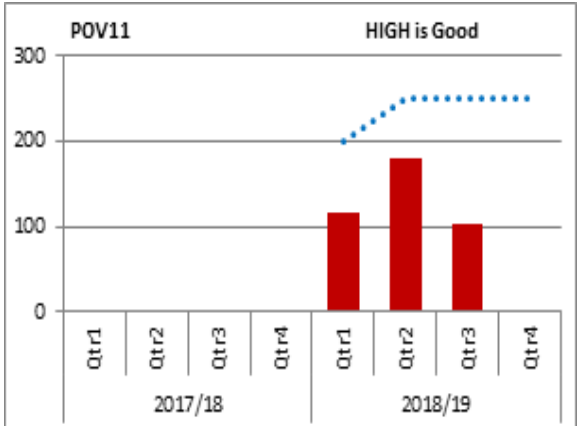
Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
HBCT02a ↴ Council Tax Reduction Speed of Processing: Average time for processing new claims.	RAG	GREEN	GREEN	AMBER	PI is slightly above target but remains reasonable performance allowing for reduced resources and the implementation of Universal Credit in the Swansea area.
	Result	14.50	17.80	18.20	
	Target	19.00	18.00	18.00	
	Trend	IMPROVING	DECLINING	DECLINING	
	Num	20463.00	23642.00	22703.00 -3.97%	
	Den	1411.00	1325.00	1244.00 -6.11%	
HBCT02b ↴ Council Tax Reduction Speed of Processing: Average time for processing notifications of change in circumstances.	RAG	GREEN	GREEN	GREEN	
	Result	3.10	3.10	4.80	
	Target	7.00	6.00	6.00	
	Trend	IMPROVING	STATIC	DECLINING	
	Num	48196.00	48175.00	76427.00 58.64%	
	Den	15347.00	15431.00	15899.00 3.03%	

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Tackling Poverty 17-22

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019																				
<p>POV05 ↑</p> <p>The amount of welfare benefits raised through securing rights and entitlements by the Welfare Rights Team</p> <p>POV05 HIGH is Good</p> <table border="1"> <caption>POV05 Data (Estimated from Chart)</caption> <thead> <tr> <th>Year</th> <th>Qtr1</th> <th>Qtr2</th> <th>Qtr3</th> <th>Qtr4</th> </tr> </thead> <tbody> <tr> <td>2016/17</td> <td>240,000</td> <td>220,000</td> <td>210,000</td> <td>400,000</td> </tr> <tr> <td>2017/18</td> <td>180,000</td> <td>290,000</td> <td>340,000</td> <td>350,000</td> </tr> <tr> <td>2018/19</td> <td>120,000</td> <td>280,000</td> <td>290,000</td> <td>-</td> </tr> </tbody> </table>	Year	Qtr1	Qtr2	Qtr3	Qtr4	2016/17	240,000	220,000	210,000	400,000	2017/18	180,000	290,000	340,000	350,000	2018/19	120,000	280,000	290,000	-	<p>RAG</p> <p>Result</p> <p>Target</p> <p>Trend</p> <p>Num</p> <p>Den</p>	<p>GREEN</p> <p>204794.00</p> <p>200000.00</p> <p>IMPROVING</p> <p>204794.00</p>	<p>GREEN</p> <p>337231.00</p> <p>200000.00</p> <p>IMPROVING</p> <p>337231.00</p>	<p>GREEN</p> <p>300497.00</p> <p>200000.00</p> <p>DECLINING</p> <p>300497.45 -10.89%</p>	<p>Figures outstanding for one particular case due to complexity of the case - figures are not finalised. There have also been a large number of postponements in this quarter.</p>
Year	Qtr1	Qtr2	Qtr3	Qtr4																					
2016/17	240,000	220,000	210,000	400,000																					
2017/18	180,000	290,000	340,000	350,000																					
2018/19	120,000	280,000	290,000	-																					
<p>POV06 ↓</p> <p>The average number of days all homeless families with children spent in Bed and Breakfast accommodation</p> <p>POV06 LOW is Good</p> <table border="1"> <caption>POV06 Data (Estimated from Chart)</caption> <thead> <tr> <th>Year</th> <th>Qtr1</th> <th>Qtr2</th> <th>Qtr3</th> <th>Qtr4</th> </tr> </thead> <tbody> <tr> <td>2015/16</td> <td>2.8</td> <td>5.0</td> <td>3.2</td> <td>4.0</td> </tr> <tr> <td>2016/17</td> <td>1.5</td> <td>6.0</td> <td>6.0</td> <td>6.0</td> </tr> <tr> <td>2017/18</td> <td>1.5</td> <td>1.5</td> <td>1.5</td> <td>1.5</td> </tr> </tbody> </table>	Year	Qtr1	Qtr2	Qtr3	Qtr4	2015/16	2.8	5.0	3.2	4.0	2016/17	1.5	6.0	6.0	6.0	2017/18	1.5	1.5	1.5	1.5	<p>RAG</p> <p>Result</p> <p>Target</p> <p>Trend</p> <p>Num</p> <p>Den</p>	<p>GREEN</p> <p>3.00</p> <p>7.00</p> <p>IMPROVING</p> <p>3.00</p> <p>1.00</p>	<p>GREEN</p> <p>0.00</p> <p>6.00</p> <p>IMPROVING</p> <p>0.00</p> <p>0.00</p>	<p>GREEN</p> <p>0.00</p> <p>6.00</p> <p>STATIC</p> <p>0.00 0%</p> <p>0.00</p>	
Year	Qtr1	Qtr2	Qtr3	Qtr4																					
2015/16	2.8	5.0	3.2	4.0																					
2016/17	1.5	6.0	6.0	6.0																					
2017/18	1.5	1.5	1.5	1.5																					

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Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
POV10  Number of people gaining employment through Employability Support	RAG			RED	The recruitment in many sectors slowed down or reduced in December and this had an impact on employment outcomes. Having said this, there was an improvement on the last quarter. With the expected recruitment drive in January from sectors post Christmas and initiatives in place for Quarter 4 (sector specific employment events) we expect there to be an improvement in Quarter 4.
	Result			91.00	
	Target			125.00	
	Trend			No Data	
	Num			91.00	
	Den				
POV11  Number of accredited qualifications achieved by adults with local Authority support	RAG			RED	The number of courses that were delivered in the period reduced from last quarter and the attendances were also affected in the month of December due to the festive period. The number of accreditations applied for and returning were also less than previously. There will be many more courses run in Quarter 4 with a high booking rate to date so we expect a significant improvement in Quarter 4.
	Result			104.00	
	Target			250.00	
	Trend			No Data	
	Num			104.00	
	Den				

During Qtr3 the Council began consultation on the new budget for 2019-20 and completed the strategic review of the Sustainable Swansea - Fit for the Future programme. Although the programme is closely aligned to the budget and Medium Term Financial Plan (MTFP), it has a much wider strategic scope encompassing areas such as organisational change and digital transformation.

In line with Transformation & Future Council well-being objectives in the Corporate Plan, work on key Council strategies continues, aiming to complete by the end of March ready for implementation in the new financial year. These include:

- Digital Strategy - Updated and revised from the 2015 strategy and including both the Council and Digital City aspirations
- Digital Inclusion Strategy - Linking with the Welsh Government's Digital Inclusion Framework so that more people can access support online
- Co-Production Strategy - Defining the Council's approach to designing services alongside communities.

The Transformation & Future Council Policy Development Committee (PDC) has developed a new approach to contract procedure rules in ways which will enable more local businesses to bid for Council contracts.

The Council has been strengthening its approach to equalities during Qtr3. The new Equalities Champions across the Council received their first training session with more to follow in the coming months. The Scrutiny Inquiry into Equalities is also well underway and scheduled to report findings in qtr4.

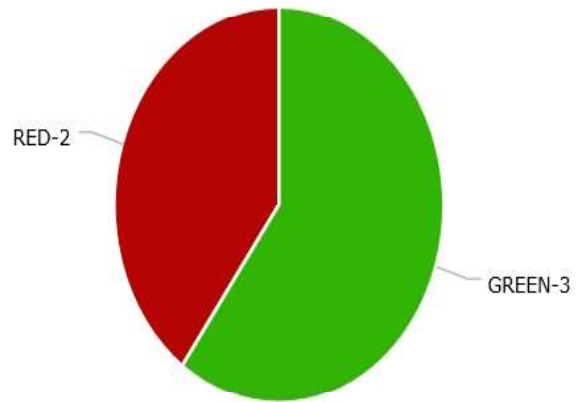
A review of Welsh Translation services is underway, reviewing ways of working. This is a shared service with Neath & Port Talbot Council.

The final phase of the Business Support implementation is being delivered through Directorate hubs. This phase of work will improve efficiency and consistency of support roles and functions across the Council.

As shown in the indicators above, performance is improving around the digital channels with online forms and payments increasing. This is encouraging given all the work towards 'digital first' objectives. New technology is being trialled in the Council Chamber to enable e-voting and webcasting with the aim of this being available in qtr4. The delivery of savings shown in the FINA6 indicator is declining. Performance is monitored by both the Corporate Management Team and Cabinet and remedial actions have been put in place to address both the in-year position and 2019-20. Whilst savings will be delivered, the challenge has been timing given the complexity of some service changes. Sickness days per employee is increasing as shown in the CHR002 indicator. More training, support and data analysis is being provided to managers alongside piloting new ways of working for employees in order to address performance in this area.

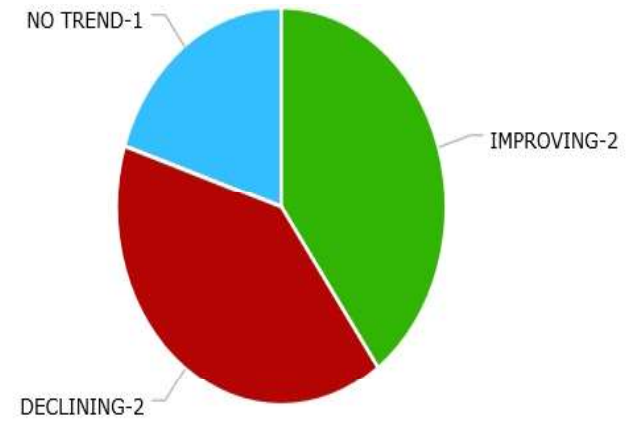
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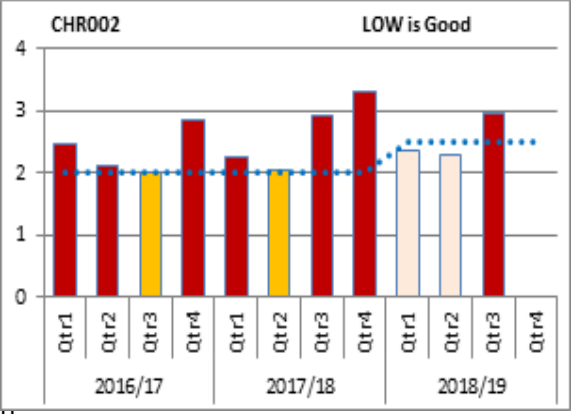
Performance against Target
2018/2019 Quarter 3



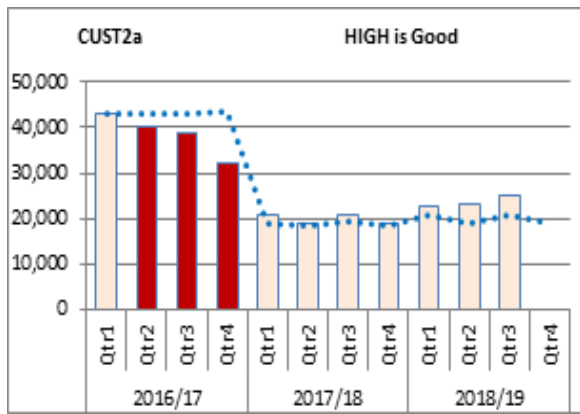
JS chart by amCharts

Performance compared to same Period of previous year
2018/2019 Quarter 3




Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
CHR002 (PAM001) ⬇ The number of working days/shifts per full time equivalent lost due to sickness absence	RAG	AMBER	RED	RED	Note from Corporate Performance Team - Data quality under review. Sickness data shows an average of 2.95 days with a percentage increase as follows in the following areas in the last twelve months: (i) Stomach complaints 16.25%; (ii) Stress 5.29%; (iii) Influenza/ Cold 7.71%; (iv) Chest Infection 6.56%; (v) Hospitalisation 9.28%; (vi) Back Injuries 4.72%. Remedial Actions include: Development of a Mental Health Policy (Occ Health); A new sickness absence Policy (HR); Greater emphasis on completion of mandatory training (e.g. DSE) and Greater promotion of sickness absence.
	Result	2.01	2.91	2.95	
	Target	2.00	2.00	2.50	
	Trend	IMPROVING	DECLINING	DECLINING	
	Num	18333.91	26484.47	26333.71 -0.57%	
	Den	9107.00	9110.00	8923.56 -2.05%	

CUST2a ⬆
 Number of online payments received via City and County of Swansea websites



RAG		GREEN	GREEN
Result		20767.00	24892.00
Target		19300.00	20800.00
Trend	No Data	DECLINING	IMPROVING
Num	38922.00	20767.00	24892.00 19.86%
Den			

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
<p>CUST2b </p> <p>Number of forms completed online for fully automated processes.</p>	RAG	GREEN	GREEN	GREEN	
Result		3599.00	3926.00	7466.00	
Target		1950.00	3800.00	5250.00	
Trend		IMPROVING	IMPROVING	IMPROVING	
Num		3599.00	3926.00	7466.00	90.17%
Den					
<p>FINA6 </p> <p>Percentage of identified forecast General Fund Revenue savings and income for the year compared to originally approved budget (Â£000's)</p>	RAG	RED	RED	RED	Delivery of savings in the Medium Term Financial Plan continues to be challenging. Many of the savings are linked with complex transformation of services. The Council aims to deliver services which are fit for the future, sustainable in the longer term and co-produced with communities. This focus on long term community outcomes has delayed delivery during the year. The Corporate Management Team and Cabinet review monthly and have initiated mitigations to impact final outturn and next year.
Result		66.72%	67.03%	50.16%	
Target		95.00%	100.00%	95.00%	
Trend		DECLINING	IMPROVING	DECLINING	
Num		15020.00	12552.00	8291.00	-33.95%
Den		22513.00	18727.00	16530.00	-11.73%

Performance Indicator	KEY	2016/2017 Quarter 3	2017/2018 Quarter 3	2018/2019 Quarter 3	Comment-2018/2019
PROC12  Number of data breaches which has resulted in an enforcement or monetary penalty notice being issued by the Information Commissioners Office (ICO)	RAG			GREEN	
	Result			0.00	
	Target			0.00	
	Trend			No Data	
	Num			0.00	
	Den				

Agenda Item 9.



Report of the Chief Finance Officer (Section 151 Officer)

Cabinet - 21 March 2019

Business Rates – Temporary Rate Relief Scheme (Wales) 2019/20

Purpose:	To provide information and to consider the adoption of a new temporary High Street and Retail Rates Relief Scheme, relating to Business Rates, which has been introduced by Welsh Government (WG) for the financial year 2019/20.
Policy Framework:	None
Consultation:	Access to Services, Finance, Legal.
Recommendation(s):	It is recommended that: 1) The details of the scheme in this report are noted. 2) The rate relief scheme and the application process outlined in this report are adopted for 2019/20.
Report Author:	Julian Morgans
Finance Officer:	Ben Smith
Legal Officer:	Debbie Smith
Access to Services Officer:	Catherine Window

1. Introduction

- 1.1 In April 2017, the Welsh Government (WG) introduced a new temporary High Street Rate Relief Scheme to reduce Business Rates (BR) in certain circumstances. This scheme was extended in 2018/19 with some amendments and has been extended for 2019/20, again with some further amendments which in effect simplify the relief by, for example, removing the 2 tier support available under the 2018/19 scheme. Also the name has been changed to “The High Street and Retail Rates Relief Scheme” (HSRRRS) to reflect a wider eligibility outside the previous geographical limitations.

- 1.2 Rate relief under the scheme is available for the financial year 2019/20 and WG has offered funding to each local authority in Wales under section 58A of the Government of Wales Act 2006 to re-imburse authorities, for expenditure up to a defined limit, incurred for the purpose of providing relief under this scheme. The funding is subject to authorities formally accepting the grant offer.
- 1.3 It is a condition of the grant that the relief under this scheme is provided by way of discretionary rate relief under section 47 of the Local Government finance Act 1988. The qualifying criteria for the HSRRS have been set by WG and there are no powers to vary. The local discretionary rate relief policy currently used to grant relief to charities and other organisations does not require amendment.

2. The High Street and Retail Rates Relief Scheme

- 2.1 This relief is aimed at businesses and retailers in Wales, for example shops, pubs, restaurants and cafes. WG has not specifically defined what it considers a 'high street' and believes each local authority is best placed to judge which businesses should qualify in its area. Unlike previous years, the 2019-20 scheme is not limited to high street premises but will include all properties within Wales meeting the wider retail criteria.
- 2.2 The scheme aims to provide support for eligible retail businesses by offering up to £2,500 discount on the non-domestic rates bill per property, to retailers:-
- In occupation as at 31 March 2019 (provided the same occupier continues to be in occupation on 1 April 2019) AND
 - Of premises with a rateable value between £6001 and £50,000 on 1 April 2019.
- 2.3 However, empty properties becoming occupied after 1 April 2019 will also qualify for this relief. This was not the case in the previous 'version' of this relief.
- 2.4 Also, if there is a change in occupier part way through the financial year, after relief has already been provided to the property, the new occupier will qualify for the relief on a pro-rata basis based on the remaining days of occupation to the end of the financial year. This was also not the case in the previous 'version' of this relief.
- 2.5 It is expected that retailers with a rateable value of £6,000 and below will receive full Small Business Rate Relief (SBRR), however it is left to the discretion of authorities to determine if there are properties not in receipt of SBRR that should be eligible for this relief.
- 2.6 Provisional Funding of up to £2,000,000 has been allocated to the Authority to fund this relief. WG will follow the process used for the 2018/19 scheme and make an initial payment followed by a top-up payment at the end of 2019/20 if necessary. The award of this relief is

subject to state aid limits.

- 2.7 To qualify for the relief a hereditament should be wholly or mainly used as a shop, restaurant, café or drinking establishment. This is a test on use rather than occupation. Therefore, hereditaments which are occupied, but not wholly or mainly used for the qualifying purpose, will not qualify for the relief.
- 2.8 WG has set out the types of properties that it does **not** consider to be high street retail use for the purpose of this relief:
- (i) The provision of financial, medical or professional services, post office sorting offices, tourism accommodation, sports clubs, children's play centres, day nurseries, outdoor activity centres, gyms, kennels and catteries, show homes and marketing suites and employment agencies.
 - (ii) Premises that are not reasonably accessible to visiting members of the public.
 - (iii) Those having a rateable value of more than £50,000.
 - (iv) Properties that are owned, rented or managed by a local authority
 - (v) Unoccupied premises.
 - (vi) Where the ratepayer is in receipt of mandatory charitable rate relief.
- 2.9 This relief can be provided in addition to SBRR and Transitional Rate Relief. High Street and Retail Rates Relief should be applied against the net bill after these two reliefs have been applied.

3. Administration and Application of the Scheme

- 3.1 In line with previous years, WG has again advised local authorities (LAs) that in order to maximise take-up and reduce the administrative burden for rate-payers and LA Revenues Services, LAs are able to determine the application process. Across Wales, a number of different award processes have historically been applied. Some authorities make automatic awards where they are satisfied the necessary criteria have been complied with. Others require all potential beneficiaries of the relief to formally apply in writing and the remainder follow an approach that is a combination of the two.
- 3.2 In 2018/19, to maximise the award of the relief to businesses in Swansea, an automatic award process was followed and it is recommended that the same process is followed for the 2019/20 scheme using the following criteria:
- (i) HSRRR is applied without the need for a formal application where it is possible for the authority to identify, to its satisfaction, an eligible

high street business premises. Businesses to whom this relief is awarded that have more than one premises in receipt of HSRR or who are receiving other De Minimis State Aid are required to advise the authority if the award breaches state aid rules.

- (ii) Where it is not possible for the authority to satisfy itself that a business premises complies with the necessary criteria, the ratepayer will be issued with a formal application to complete and return which will also be subject to State Aid consideration.

4. Implementation of the Scheme

4.1 WG has provided the following to authorities:

- Guidance for the HSRRRS
- A certificate of acceptance form to confirm the estimated number of properties that will benefit from the scheme

4.2 The HSRRRS scheme outlined above should be adopted as specified in the recommendations above.

4.3 The most recent estimates suggest approximately 1100 business properties will be eligible and will have relief applied to their accounts if the scheme is adopted. This will involve significant extra workload for the Business Rates team although using an automatic award process will assist with this additional burden.

5. Financial Implications

5.1 WG will specify the amount of funding available for the scheme once the certificate of acceptance which includes an estimate of the required funding has been considered. An initial provisional funding amount of £2,000,000 has been allocated to the Authority. Any award made in excess of the funding may have to be met by the Authority.

5.2 In previous years WG have provided a grant to the authority to support the administration and marketing costs of the relief. No details of whether such a grant will again be provided this year have been received as of the date this report was written. However, given the level of financial benefits to the businesses in the Swansea area, it is considered that this should not prevent the authority adopting the scheme.

5.3 Estimates of eligible properties have been provided by each Welsh LA at the request of WG. There is a small risk that the funding that has been agreed by WG, based on the estimates, could be insufficient as estimates were provided based on descriptions of properties contained in the Valuation List, which is maintained by the Valuation Office Agency and there may be instances where the description is not wholly accurate. At present it is uncertain whether LAs would be able to reclaim any amount of relief applied in excess of the agreed scheme funding provided from WG although this seems likely as WG has recognised the funding

requests are only estimates of the likely cost of the scheme. Whilst there is thus some risk of an element of non-reimbursement to the authority if actual eligibility experience differs from the estimate, it is felt on balance that it is worth that residual risk to enable local businesses to benefit from the scale of overall relief offered.

6. Legal Implications

6.1 There are no further legal implications to those set out in the report.

7. Equality and Engagement Implications

7.1 The Council is subject to the Public Sector Equality Duty (Wales) and must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Our Equality Impact Assessment process ensures that we have paid to regard to the above.

7.2 An EIA screening has been completed with the agreed outcome that a full EIA report is not required as the qualifying criteria for the HSRRRS has been set by WG and there is no power to vary. Relief will be awarded to all eligible ratepayers as per the criteria set out in this report

Background Papers:

EIA Screening

Appendices:

Appendix 1 - Non-domestic Rates High Street and Retail Rates Relief in Wales 2019-20 Guidance



Llywodraeth Cymru
Welsh Government

Non-domestic Rates

High Street and Retail Rates Relief in Wales - 2019-20

Guidance

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Non-domestic Rates – High Street and Retail Rates Relief

Guidance

About this guidance

1. This guidance is intended to support local authorities in administering the High Street and Retail Rates Relief scheme (“the relief”) announced by the then Cabinet Secretary for Finance on 10 December 2018. This guidance applies to Wales only.
2. This guidance sets out the criteria which the Welsh Government will use to determine the funding for local authorities for relief provided to high street and retail properties. The guidance does not replace any existing non-domestic rates legislation or any other relief.
3. Enquiries on the scheme should be sent to:
localtaxationpolicy@gov.wales
4. The relief is being offered from 1 April 2019 and will be available until 31 March 2020.

Introduction

5. This relief is aimed at high street businesses and retailers in Wales, for example shops, pubs, restaurants and cafes.
6. The Welsh Government will provide grant funding to the 22 Unitary Authorities to continue the High Street and Retail Rates Relief scheme to eligible ratepayers for 2019-20. The enhanced scheme aims to provide support for eligible retail businesses by offering up to £2,500 discount on the non-domestic rates bill per property, to retailers occupying premises with a rateable value of £50,000 or less in the financial year 2019-20, subject to State Aid limits.
7. This document provides guidance on the operation and delivery of the scheme.

Section 1

High Street and Retail Rates Relief

How will the relief be provided?

8. As this is a temporary measure, we are providing the relief by reimbursing local authorities that use their discretionary relief powers under section 47 of the Local Government Finance Act 1988. It will be for individual local authorities to adopt a scheme and decide in each individual case when to grant relief under section 47. The Welsh Government will then reimburse local authorities for the relief that is provided in line with this guidance via a grant under section 58A of the Government of Wales Act 2006.

How will the scheme be administered?

9. It will be for local authorities to determine how they wish to administer the scheme to maximise take-up and minimise the administrative burden for ratepayers and for local authority staff. Subject to State Aid considerations set out in paragraphs 29 to 33.
10. Local authorities are responsible for providing ratepayers with clear and accessible information on the details and administration of the scheme. If, for any reason, an authority is unable to provide this relief to eligible ratepayers from 1 April 2019, consideration should be given to notifying eligible ratepayers that they qualify for the relief and that their bills will be recalculated.

Which properties will benefit from relief?

11. Properties that will benefit from this relief will be occupied high street business and retail properties such as shops, restaurants, cafes and drinking establishments, with a rateable value of £50,000 or less on 1 April 2019. More detailed eligibility criteria and exceptions to the relief are set out in paragraphs 15 to 19.
12. Relief should be granted to businesses as a one-off payment based on occupation as at 31 March 2019 (provided the same occupier continues to be in occupation on 1 April 2019). It is recognised that there may be some instances where a local authority is retrospectively notified of a change of occupier. In such cases, if it is clear that the occupier was in occupation on 1 April 2019, the local authority may use its discretion in awarding relief.

Level of support: up to £2,500

13. Eligible ratepayers will be retailers whose property has a rateable value between £6,001 and £50,000 on 1 April 2019-20. It is expected that retailers with a rateable value of £6,000 and below will receive full Small Business Rate Relief (SBRR), however it is left to the discretion of authorities to determine if there are properties not in receipt of SBRR that should be eligible for this relief.

14. Unlike previous years, the 2019-20 scheme is not limited to high street premises but will include all properties within Wales meeting the wider retail criteria.

15. It is intended that, for the purposes of this scheme, retail properties such as, “shops, restaurants, cafes and drinking establishments” will mean the following (subject to the other criteria in this guidance).

Hereditaments that are being used for the sale of goods to visiting members of the public

- Shops (such as florists, bakers, butchers, grocers, greengrocers, jewellers, stationers, off-licences, newsagents, hardware stores, supermarkets, etc)
- Opticians
- Pharmacies
- Post offices
- Furnishing shops or display rooms (such as carpet shops, double glazing, garage doors)
- Car or caravan showrooms
- Second hand car lots
- Markets
- Petrol stations
- Garden centres
- Art galleries (where art is for sale or hire)

i. Hereditaments that are being used for the provision of the following services to visiting members of the public

- Hair and beauty services
- Shoe repairs or key cutting
- Travel agents
- Ticket offices, eg. for theatre
- Dry cleaners
- Launderettes
- PC, TV or domestic appliance repair
- Funeral directors
- Photo processing
- DVD or video rentals
- Tool hire
- Car hire
- Cinemas
- Estate and letting agents

ii. Hereditaments that are being used for the sale of food and / or drink to visiting members of the public

- Restaurants
- Drive-through or drive-in restaurants
- Takeaways

- Sandwich shops
 - Cafés
 - Coffee shops
 - Pubs
 - Wine Bars
16. To qualify for the relief a hereditament listed in (i) to (iii) should be wholly or mainly used as a shop, restaurant, café or drinking establishment. This is a test on use rather than occupation. Therefore, hereditaments which are occupied but not wholly or mainly used for the qualifying purpose will not qualify for the relief.
17. The above list is not intended to be exhaustive as it would be impossible to list all the many and varied retail uses that exist. There will also be mixed uses. However, it is intended to be a guide for local authorities as to the types of uses that the Welsh Government considers for this purpose to be high street and retail. Local authorities should determine for themselves whether particular properties not listed are broadly similar in nature to those above and, if so, to consider them eligible for the relief. Conversely, properties that are not broadly similar in nature to those listed above should not be eligible for the relief.
18. As the grant of the relief is discretionary, local authorities may choose not to grant the relief if they consider that appropriate, for example where granting the relief would go against the local authority's wider objectives for the local area.

Types of hereditaments that are not considered to be eligible for High Street and Retail Rates Relief

19. The list below sets out the types of uses that the Welsh Government does not consider to be retail use for the purpose of this relief and would not be deemed eligible for the relief. However, it will be for local authorities to determine if hereditaments are similar in nature to those listed below and if they would not be eligible for relief under the scheme.
- i. *Hereditaments that are being used wholly or mainly for the provision of the following services to visiting members of the public***
- Financial services (eg. banks, building societies, cash points, ATMs, bureaux de change, payday lenders, betting shops, pawn brokers)
 - Medical services (eg. vets, dentists, doctors, osteopaths, chiropractors)
 - Professional services (eg. solicitors, accountants, insurance agents, financial advisers, tutors)
 - Post office sorting office
 - Tourism accommodation, eg. B&Bs, hotel accommodation and caravan parks
 - Sports clubs
 - Children's play centres
 - Day nurseries
 - Outdoor activity centres
 - Gyms
 - Kennels and catteries
 - Show homes and marketing suites

- Employment agencies

There are a number of further types of hereditaments which the Welsh Government believes should not be eligible for the High Street Relief Scheme.

ii. *Hereditaments with a rateable value of more than £50,000*

It is recognised there are some retail businesses with rateable value above the £50,000 relief who will not be eligible for this relief. However, local authorities have the option to use their discretionary powers to offer discounts outside this scheme to such businesses if it is in the interests of the local community to do so.

iii. *Hereditaments that are not reasonably accessible to visiting members of the public*

If a hereditament is not reasonably accessible to visiting members of the public, it will be ineligible for relief under the scheme even if there is ancillary use of the hereditament that might be considered to fall within the descriptions in paragraph 15 (i), (ii) or (iii).

iv. *Hereditaments that are not occupied*

Properties that are not occupied on 1 April 2018 should be excluded from this relief. However, under the Empty Property Relief scheme, empty properties will receive a 100% reduction in rates for the first three months (and in certain cases six) of being empty.

v. *Hereditaments that owned, rented or managed by a local authority*

Hereditaments that owned, rented or managed by a local authority such as Visitor Centres, Tourist Information shops and council run coffee shops/gift shops attached to historic buildings, are exempt from this scheme.

vi. *Hereditaments that are in receipt of mandatory charitable rates relief*

These properties already receive mandatory charitable relief which gives an 80% reduction in liability and authorities may also choose to provide discretionary charitable relief which can reduce the remaining liability to nil. As such, these properties will not be eligible for High Street Rate Relief.

How much relief will be available?

20. The total amount of government funded relief available for each property for 12 months under this scheme is up to £2,500. This relief can be provided in addition to SBRR and Transitional Rate Relief. High Street and Retail Rates Relief should be applied against the net bill after these two reliefs have been applied. Any hardship or discretionary relief awarded by the local authority should be considered by the local authority once all other rates reliefs have been awarded.

21. The eligibility for the relief and the relief itself will be assessed and calculated on a daily basis. The following formula should be used to determine the amount of relief to be granted for a particular hereditament in the financial year:

Amount of relief to be granted = $A \times (B / C)$

Where:

A is the funding amount of £2,500

B is the number of days in the financial year that the hereditament is eligible for relief; and

C is the number of days in the financial year

22. When calculating the relief, if the net liability before High Street and Retail Rates Relief is £2,500 or less, the maximum amount of this relief will be no more than the value of the net rate liability. This should be calculated ignoring any prior year adjustments in liabilities which fall to be liable on the day.
23. Ratepayers that occupy more than one property will be entitled to High Street and Retail Rates Relief for each of their eligible properties, subject to State Aid de minimis limits.

Changes to existing hereditaments, including change in occupier

24. Eligibility for the relief will be calculated based on the circumstances of the property and ratepayer as at 1 April 2019. Changes to properties which occur after this date will have no impact on eligibility for this relief.
25. Empty properties becoming occupied after 1 April 2019 will qualify for this relief.
26. If there is a change in occupier part way through the financial year, after relief has already been provided to the hereditament, the new occupier will qualify for the relief on a pro-rata basis based on the remaining days of occupation using the formula in paragraph 21 of this guidance.

State Aid

27. State Aid law is the means by which the European Union regulates state funded support to businesses. Providing discretionary relief to ratepayers is likely to amount to State Aid. High Street and Retail Rates Relief will be State Aid compliant where it is provided in accordance with the De Minimis Regulation (1407/2013).
28. The De Minimis Regulation allows an undertaking to receive up to €200,000 of De Minimis aid in a three-year period (consisting of the current financial year and the two previous financial years). Local authorities should familiarise themselves with the terms of this State Aid exemption, in particular the types of undertaking that are excluded from receiving De Minimis aid, the relevant definition of undertaking and the requirement to convert the aid into Euros.
29. To administer De Minimis it is necessary for the local authority to establish that the award of aid will not result in the undertaking having received more than €200,000 of De Minimis aid. Note that the threshold only relates to aid provided under the De Minimis Regulations (aid under other exemptions or outside the scope of State Aid is not relevant to the De Minimis calculation).
30. Section 3 of this guidance contains a sample De Minimis declaration which local authorities may wish to use. Where local authorities have further questions about De Minimis or other aspects of State Aid law, they should seek advice from their legal department in the first instance.
31. Desk instructions covering the administration of De Minimis schemes are available at:

<http://gov.wales/funding/state-aid/de-minimis-aid/?lang=en>

http://ec.europa.eu/competition/state_aid/legislation/de_minimis_regulation_en.pdf

Section 2 – State Aid

Sample paragraphs that could be included in letters to ratepayers about High Street and Retail Rates Relief for 2019-20

The Cabinet Secretary for Finance announced on 10 December 2018 that an additional £23.6 million of funding would be available to extend and expand the existing High Street and Retail Rates Relief scheme for 2019-20.

Relief of up to £2,500 will be provided to eligible occupied retail properties with a rateable value of £50,000 or less in 2019-20. Your current rates bill includes this High Street and Retail Rates Relief.

Awards such as High Street and Retail Rates Relief are required to comply with the EU law on State Aid¹. In this case, this involves returning the attached declaration to this authority if you have received any other De Minimis State Aid, including any other High Street and Retail Rates Relief you are being granted for premises other than the one to which this bill and letter relates, and confirming that the award of High Street and Retail Rates Relief does not exceed the €200,000 an undertaking² can receive under the De Minimis Regulations EC 1407/2013.

Please complete the declaration and return it to the address above. In terms of declaring previous De Minimis aid, we are only interested in public support which is De Minimis aid (State Aid received under other exemptions or public support which is not State Aid does not need to be declared).

If you have not received any other De Minimis State Aid, including any other High Street and Retail Relief you are being granted for premises other than the one to which this bill and letter relates, you do not need to complete or return the declaration.

If you wish to refuse to receive the High Street and Retail Rates Relief granted in relation to the premises to which this bill and letter relates, please complete the attached form and return it to the address above. You do not need to complete the declaration. This may be particularly relevant to those premises that are part of a large retail chain, where the cumulative total of High Street and Retail Rates Relief received could exceed €200,000.

Under the European Commission rules, you must retain this letter for three years from the date on this letter and produce it on any request by the UK public authorities or the European Commission. (You may need to keep this letter longer than three years for other purposes). Furthermore, information on this aid must be supplied to any other public authority or agency asking for information on 'De Minimis' aid for the next three years.

1. Further information on State Aid law can be found at <https://www.gov.uk/state-aid>

2 An undertaking is an entity which is engaged in economic activity. This means that it puts goods or services on a given market. The important thing is what the entity does, not its status. Thus a charity or not for profit company can be undertakings if they are involved in economic activities. A single undertaking will normally encompass the business group rather than a single company within a group. Article 2.2 of the de minimis Regulations (Commission Regulation EC/ 1407/2013) defines the meaning of 'single undertaking'.

‘De Minimis’ declaration

Dear []

NON-DOMESTIC RATES ACCOUNT NUMBER: _____

The value of the non-domestic rates High Street and Retail Rates Relief to be provided to [name of undertaking] by [name of local authority] is £ [] (Euros []).

This award shall comply with the EU law on State Aid on the basis that, including this award, [name of undertaking] shall not receive more than €200,000 in total of De Minimis aid within the current financial year or the previous two financial years). The De Minimis Regulations 1407/2013(as published in the Official Journal of the European Union L352 24.12.2013) can be found at:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:352:0001:0008:EN:PDF>.

Amount of De Minimis aid	Date of aid	Organisation providing aid	Nature of aid
€	1 April 2019 – 31 March 2020	Local authorities (for the High Street and Retail Rates Relief total, you do not need to specify the names of individual authorities)	High Street and Retail Rates Relief

I confirm that:

- 1) I am authorised to sign on behalf of _____[name of undertaking]; and
- 2) _____[name of undertaking] shall not exceed its De Minimis threshold by accepting this High Street and Retail Rates Relief.

SIGNATURE:

NAME:

POSITION:

BUSINESS:

ADDRESS:

DATE:

Refusal of High Street and Retail Rates Relief form

Name and address of premises	Non-domestic rates account number	Amount of High Street and Retail Rates Relief

I confirm that I wish to refuse High Street and Retail Rates Relief in relation to the above premises.

I confirm that I am authorised to sign on behalf of _____ [name of undertaking].

SIGNATURE:

NAME:

POSITION:

BUSINESS:

ADDRESS:

DATE:

Agenda Item 10.



Report of the Cabinet Member for Education Improvement, Learning and Skills Cabinet – 21 March 2019

School Organisation linked to the Welsh Education Strategic Plan - including proposed closure of YGG Felindre and enhanced size and relocation of YGG Tan-y-lan and YGG Tirdeunaw

Purpose:	To consider objections received during the Statutory Notice period and to seek determination on the proposals to: (i) close YGG Felindre with effect from 31 August 2019 (ii) increase the size of YGG Tan-y-lan on a new site from January 2021 (iii) increase the size of YGG Tirdeunaw on a new site from January 2021 (iv) implement the catchment area changes associated with (ii) and (iii) from September 2021
Policy Framework:	QEd Programme Corporate Plan 2008/22
Consultation:	Access to Services, Finance, Legal.
Recommendation(s):	<ol style="list-style-type: none">1) To determine that YGG Felindre should close with effect from 31 August 20192) To approve the publication of the Objection Report for YGG Felindre (draft at Appendix A)3) To determine that the capacity of YGG Tan-y-lan increases to 420 plus nursery in a new build school at Beacons View Road, Clase from January 2021, with associated catchment area changes implemented from September 20214) To determine that the capacity of YGG Tirdeunaw increases to 525 plus nursery in a new build school at the YGG Bryn Tawe site, off Heol Gwrosydd from January 2021, with associated catchment area changes implemented from September 2021
Report Author:	Kelly Small
Finance Officer:	Ben Smith

Legal Officer:	Tracey Meredith
Access to Services Officer:	Rhian Millar

1. Introduction

1.1 A detailed report was presented to Cabinet on the 21 June 2018 which considered the next steps required to progress the approved commitments within the Welsh Education Strategic Plan (WESP), as reflected in the approved 21st Century Schools Band B programme, and approved the commencement of formal statutory consultation where this was appropriate.

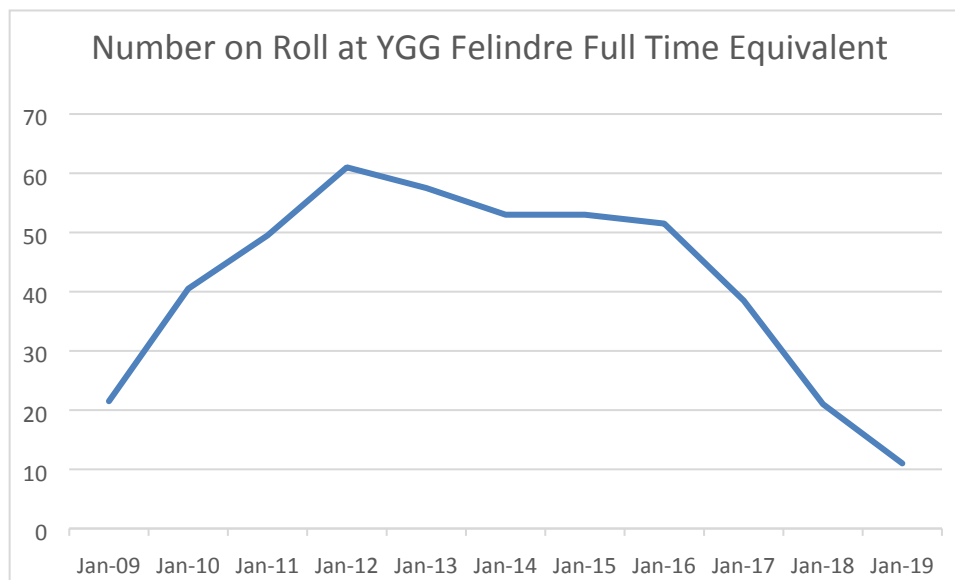
1.2 The approved WESP includes the following key points:

Our 21st Century Schools Programme Band B submission would support a further 750 to 850 Welsh-medium places and enable a further 1,000 to 1,200 pupils to be educated through the medium of Welsh.

An appropriate level of surplus places, consistent with national guidelines, would provide further flexibility to respond to even greater demand for places.

Where appropriate, opportunities will be taken to develop greater collaboration and more formal federated provision as part of a developing strategy to build leadership and management capacity within the Welsh-medium sector. This will also include consideration of options to ensure the future sustainability of the quality of provision currently at YGG Felindre.

1.3 The number of learners on roll at YGG Felindre has always been small (under 90) and under scrutiny as follows:



1.4 Appendix D outlines the consistent support provided by the local authority to maintain standards at YGG Felindre over the four-year period prior to the school closure proposal being made. During this time, alternatives to the closure of YGG Felindre had been considered by officers at a number of internal meetings prior to consultation, including federation (where YGG Felindre and another school could continue to exist but under one new governing body with the option to share resources and some of their staffing). The local authority has powers to direct the federation of schools but considered 'forced' federation

as an option that would not work and that closure would be the best option to address the challenges facing the learners at YGG Felindre. This was based on the following:

- YGG Felindre would have a part-time headteacher at the school site, with a risk of failure to maintain sustainability of appropriate educational provision due to the need to ensure appropriate management of each school site.
- Federation would not give YGG Felindre capacity to self-improve and to meet the demands of the new curriculum as quickly as moving learners to another school.
- The demands of the new curriculum will impact more on smaller schools. Existing staff in a federation are not required to work in another school unless they agree to move to a flexible contract but a flexible contract would put them at greater risk of redundancy should one of the schools in the federation be unable to set a balanced budget.
- Federation would not effectively address the projected number of pupils at the school as parental preference would have to be met and the number of applications to YGG Felindre is reducing each year. There is sufficient capacity at YGG Tan-y-lan to accommodate learners from YGG Felindre.
- Future liabilities in terms of building maintenance costs would remain and energy costs are increasing.
- Federations should not be seen as a financial saving and therefore YGG Felindre could, with financial predictions being poor for the coming years, be in a position where they could not set a balanced budget without reducing their staffing levels, impacting on the educational provision for learners.
- Pupils would remain in the same mixed age cohorts although there would be some opportunities to undertake activities with pupils on other sites but with staff/pupils travelling to provide the same breadth of curriculum support as would be available on a single site if YGG Felindre closed and pupils moved to YGG Tan-y-lan.
- Effective federation requires full ownership from all parties rather than council direction and, until recently, there has been no indication to date of such interest from another school. YGG Lon-las have only said that they would consider federation if Cabinet decide to keep YGG Felindre open and have not presented a business case for how the federation would work.
- The cost per pupil is £8,815 compared with a county average of £3,487 and this unbalanced distribution would remain.

However, local authority officers have offered to meet with the governing bodies of a number of schools to provide appropriate factual information about federation to enable them to consider, and if they so wish, propose federation.

- 1.5 Consultation took place as is required in the Welsh Government's School Organisation Code between 5 September and 18 October 2018. This involved the circulation of consultation papers to learners, parents, staff and governors at the affected school as well as to other interested parties. The consultation

paper and related documents can be found on the council's website <https://www.swansea.gov.uk/schoolconsultations2018>

- 1.6 A number of consultation meetings and drop-in sessions were also held.
- 1.7 On 20 December 2018, Cabinet considered the responses received and the Consultation Report that had been produced and approved the publication of statutory notices inviting any formal objections to the following proposals:
 - (i) The closure of YGG Felindre from the 31 August 2019, with pupils transferring to YGG Tan-y-lan
 - (ii) Increasing the pupil capacity of YGG Tan-y-lan to 420 plus nursery in a new build school at Beacons View Road, Clase from January 2021, with associated catchment area changes implemented from September 2021
 - (iii) Increasing the pupil capacity of YGG Tirdeunaw to 525 plus nursery in a new build school at the YGG Bryn Tawe site, off Heol Gwyrosydd from January 2021, with associated catchment area changes implemented from September 2021

2. Statutory Notice and Objections

- 2.1 The statutory notice period ran from 9 January 2019 to 6 February 2019.
- 2.2 There were no objections to the statutory notice to increase the pupil capacity of YGG Tan-y-lan to 420 plus nursery in a new build school at Beacons View Road, Clase from January 2021, with associated catchment area changes implemented from September 2021. Therefore, officers recommend that Cabinet determine to implement this proposal as per the statutory notice.
- 2.3 There were no objections to the statutory notice to increase the pupil capacity of YGG Tirdeunaw to 525 plus nursery in a new build school at the YGG Bryn Tawe site, off Heol Gwyrosydd from January 2021, with associated catchment area changes implemented from September 2021. Therefore, officers recommend that Cabinet determine to implement this proposal as per the statutory notice.
- 2.4 363 written objections were received to the YGG Felindre closure proposal (9 of these being after the end of the objection period). 337 of these objections were in the form of a standard letter, with 56 of these being from residents of Felindre, 111 being from residents of the wider Swansea area and 170 being from people living outside of the Swansea area. The vast majority of the standard letters were facilitated by Cymdeithas yr Iaith Gymraeg and were sent from the one email address with different names and addresses noted in each email/letter.
- 2.5 A petition was received stating "We need your help! The L.A. proposes to close our amazing, welsh medium school. We are fighting to keep it open. Felindre is one of the last villages in the Swansea area, where welsh is still spoken as a first or second language on a daily basis", signed by 195 people.

- 2.6 One objector had sent in an open letter to elected members in Swansea that had the names of 124 people listed as supporting the statement.
- 2.7 RhAG (Parents for Welsh-medium Education) is an organisation established in 1952 to encourage the development of Welsh-medium education. It is funded by the Welsh Government and represents the parents of pupils in Welsh-medium schools, and is in regular contact with Welsh-medium schools. RhAG made the following comments during the statutory notice period:
1. We are aware that the number of pupils at Ysgol Gymraeg Felindre has become too small to maintain viable education.
 2. We are also aware that the number of pupils living in the catchment area of Ysgol Gymraeg Felindre is very small. This reflects the demographic change in the area, and the mobility of parents in terms of work.
 3. There are plans to build a large number of houses near the M4, between Llangyfelach and Felindre. For this reason, and given the County's wider educational service, we would wish to see the County retaining the school at Felindre for the purposes Welsh medium education. This could include:
 - i. Pre-school provision
 - ii. A Pupil Referral Unit
 - iii. A Latecomers' Unitii. above might be very appropriate, offering pupils a rural and creative atmosphere, which is likely to differ from their home or urban circumstances.
 4. The above schemes might be linked to another Welsh medium school which will serve the area.

There is no plan for the future use of the Felindre school site but, should Cabinet agree to close the school, consideration will be given to alternative uses, subject to demand and other factors, before any disposal takes place.

RhAG's full response to support all three proposals can be found at Appendix C.

- 2.8 A draft Objection Report is attached at Appendix A for Cabinet to consider. This includes a summary of all objections received and the local authority response to those objections. It should be noted that Cabinet members have also had access to all written objections in full in advance of the meeting to support them in their determination of the proposal.
- 2.9 The main objections raised were:
- 2.10 Current School and Site:

Objection: Objectors feel that Felindre has plenty of open space, with access to a large playing field and multi-use games area, as well as unlimited access to the village hall. It is also within walking distance of the Lliw Reservoirs. The school is a valuable cultural asset to the community having been part of village life since 1877. It allows the wellbeing of pupils, allowing them to thrive in a vibrant and nurturing environment. Felindre school has become a hub for other

schools in the last few months, bringing in children from other Welsh schools to take part in activities such as sports, forest schooling and our local Eisteddfod, leaving them all the more richer for their experiences here. The loss of Felindre School will have a vast impact on these surrounding Welsh schools.

Council response: Externally, the site has some attractive features, as well as access to the nearby community hall and sports area, but the site falls short of the Building Bulletin minimum site area requirements. YGG Tan-y-lan and YGG Tirdeunaw could have their own new sites in January 2021 that will be designed to support a 21st century curriculum and will include sport and grassed areas as well as landscaped grounds. This is already the case at YGG Lon-las.

2.11 Size of School

Objection: Objectors feel that parents should have the option to choose a small school as they feel this can be beneficial for learners as they have small classes and more opportunity for children to take part in sports and social activities. Objectors suggest that pupil numbers have reduced because of the threat of closure.

Council response: This proposal is about the quality and sustainability of education at YGG Felindre. All children are currently taught in one classroom covering nursery to Year 6. Staff expertise is required for the six areas of learning proposed for September 2022, as well as literacy, numeracy and digital competency skills. Regional ERW School Improvement officers believe that these skills and expertise may not be shared sufficiently, and that teaching ten pupils would make it difficult to meet learners needs. In addition, meeting the needs of learners with additional learning needs, as well as the breadth of areas of learning and experience, would be difficult for a single teacher to address. ERW School Improvement officers also believe that the current statutory curriculum with twelve subjects and a range of ages and abilities would present a workload issue for a single teacher with such a broad range of age, development stage and ability in one class. The officers believe that the only educational argument to keep Felindre would be that pupils would benefit from a high pupil teacher ratio and this can lend itself to pupil well-being and a positive relationship with the teacher. However, well-being alone does not cater for the learning needs of children. For the reasons stated above, it would be challenging for teaching and learning to be satisfactory across all age ranges in a single classroom and this could negate the positives gained in a small class size. There will be a wider range of activities and team sports available in a larger school for children to choose from, so they have more options to find something they enjoy. Pupil numbers had fallen before the closure proposal was announced. There is no indication that numbers will increase. Future potential housing developments have been considered, however, the timescale and nature of any such developments remain uncertain and the future need for educational provision would be intrinsically linked and outside of the village itself.

2.12 Leadership

Objection: Objectors felt that there have been a number of headteachers over recent years and this has affected pupil numbers, and that the local authority must take some responsibility for this as it did not step in to stop this from happening and should support the governors in appointing a permanent headteacher. The view of some objectors was that a permanent headteacher should have been appointed before announcing the consultation to boost numbers.

Council response: Small schools can struggle to keep headteachers as larger schools can offer more attractive salaries and career progression. The council has supported Felindre by sourcing and funding deputy headteachers to act as headteacher but these quality staff have then been successful in gaining permanent headteacher posts in other schools. Adverts have been placed twice but the governors were unable to appoint in both instances. It would not be sensible to advertise for a headteacher while there is ongoing consultation on a closure proposal.

2.13 Education

Objection: In the consultation papers the council say that the closure proposal is for educational reasons but objectors state that the council does not appear to have carried out an assessment of the current quality of education at the school. As noted by Estyn in their consultation response, the council has not considered any educational advantages of keeping the school open.

Council response: All schools are constantly monitored by ERW, the regional school improvement service. This shows that the school requires much support and is not improving fast enough or showing the ability to self-improve. The consultation paper must include the latest Estyn inspection report, which it did. ERW School Improvement officers believe that the only educational argument to keep Felindre open would be that pupils would benefit from a high pupil teacher ratio and this can lend itself to pupil well-being and a positive relationship with the teacher. However, well-being alone does not cater for the learning needs of children. It would be challenging for teaching and learning to be satisfactory in a single classroom and this could negate the positives gained in a small class size. All children are currently taught in one classroom covering nursery to Year 6. Expertise is required for the six areas of learning proposed for September 2022, as well as literacy, numeracy and digital competency skills. The regional ERW School Improvement Service employs Challenge Advisers to monitor school provision, and the professional opinion of officers working with Swansea schools is that the required skills and expertise cannot be shared sufficiently in a school as small as YGG Felindre. The officers believe that teaching ten pupils would make it difficult to meet learners' needs. In addition, meeting the needs of learners with additional learning needs, as well as the breadth of areas of learning and experience, would be difficult for a single teacher to address. The current statutory curriculum with twelve subjects and a range of ages and abilities would present a workload issue for a single teacher with such a broad range of age, development stage and ability in one class.

2.14 Impact on the Welsh Language

Objection: By far the majority of objections were in relation to the Welsh language. As mentioned earlier, the bulk of standard response letters were facilitated by Cymdeithas yr Iaith Gymraeg. Objectors noted that the parish of Mawr is the second largest parish in Swansea, and has the largest Welsh speaking population. Felindre is one of only a few Welsh communities in which the Welsh language continues to thrive. The council have already closed the Welsh-medium primary school in Garnswllt and therefore closing Felindre will remove all Welsh-medium schools from the Mawr parish. Objectors expressed the view that the Welsh language needs to be nurtured in a suitable environment, and Felindre does this through the community (Eisteddfods, youth club and chapel) so that it is a living language and not just a language of the classroom. They feel that a Welsh-speaking school is vital for language survival in the village, with the school being the heartbeat of daily use of the Welsh language. Objectors believe that the proposal will be detrimental to the Welsh language.

Council response: There are only ten full time learners at the school and only three of these live in Felindre. Parents are choosing to send their children out of the village for their education. As above, we have been informed that recently other schools have attended the Eisteddfod etc. and there is no reason why these trips cannot continue to the Mawr ward. This proposal is one part of a wider plan to increase Welsh-medium provision, with the two new build schools for Tan-y-lan and Tirdeunaw providing a vastly increased number of Welsh-medium places in buildings that are fit for the 21st Century.

2.15 Community Impact

Objection: Many objectors noted in their standard letter that community members support the prosperity and success of the pupils at Felindre and that this is noted in Estyn inspections. They feel that closing the school will change the nature and character of this Welsh-speaking village forever and it will become an isolated community.

Council response: There are only 10 full time learners at the school and less than half of these live in Felindre. Parents are choosing to send their children out of the village for their education.

2.16 Alternatives to Closure

1. Federation with another school: *Objectors felt that the local authority had not fully explored or encouraged federation of YGG Felindre with another school. The governors at YGG Lon-las agreed at their meeting on 31 January 2019 that they would federate with YGG Felindre.*

Council response: No other school had been identified that would federate with Felindre when the closure proposal went out for consultation; therefore there was no business case to make the school sustainable. Lon-las have agreed to consider federation if Cabinet decide to keep the school open at

their meeting on 21 March 2019 but they have not produced a business case on how they would make the school sustainable. Officers continue to believe that federation will not address the reasons that closure has been proposed. Federation should not be seen as a way to address financial difficulties as savings are limited, as has been seen in federations across Wales. Some savings can be made if the federation decides to appoint a shared headteacher and deputy headteacher(s) but their pay range usually increases to reflect the increased number of learners across the federation and backfill is needed for deputy headteacher non-contact time when the headteacher is at the other site. Two premises would need to be maintained. The reality of sharing resources across two sites a distance apart is limited. Existing staff cannot be made to work at the other school unless they agree to change the terms of their contract. Federation could mean no guarantee of increase in pupil numbers, making it difficult to provide a curriculum in a single class for a broader range of skill levels than you would normally find in a classroom. As federation does not guarantee movement of teachers between schools, any expertise for the six areas of learning proposed for September 2022, as well as literacy, numeracy and digital competence, may not be shared sufficiently. Regional ERW School Improvement officers believe that teaching ten pupils would make it difficult to meet learners' needs. In addition, meeting the needs of learners with additional learning needs as well as the breadth of areas of learning and experience would be difficult for a single teacher to address. The current statutory curriculum with twelve subjects and a range of ages and abilities would present a workload issue for a single teacher with such a broad range of age, development stage and ability in one class. ERW School Improvement officers believe that the only educational argument to keep Felindre would be that pupils would benefit from a high pupil teacher ratio and this can lend itself to pupil well-being and a positive relationship with the teacher. However, well-being alone does not cater for the learning needs of children. For the reasons stated above, it would be challenging for teaching and learning to be satisfactory in a single classroom and this could negate the positives gained in a small class size.

2. *Catchment Review: A large number of objectors, mainly through the standard letters, suggest that the catchment area of Felindre could be expanded so increase the number on roll.*

Council response: Extending the catchment area will not increase the size of the school as parents have a choice over where they send their children to school. Parents that live in Felindre are currently sending their pupils elsewhere but could choose to send them to Felindre if they wished as there is space. Similarly if parents outside of Felindre wished to send their children to Felindre now they could. There have been separate proposals to increase the size of neighbouring schools with a review of catchment area to better suit demand. Changing the catchment area for Felindre would mean that children may have to be bussed into the village when there is already space for them much closer and potentially in new buildings designed for education in the 21st Century.

3. Delay closure until the new Tan-y-lan building is ready for occupation: *Objectors felt that moving some learners twice in two years would be stressful.*

Council response: Not all learners will move twice. It would only be those currently in Nursery to Year 4. The first move would be into YGG Tan-y-lan where they would integrate into their new classes, and then for the second move they would move with their classmates and their teacher to a new build school. Although any move could be stressful for a child, they will be supported throughout the process, and moving to a new site with better facilities might equally be an exciting prospect. Officers also believe that YGG Felindre would not be sustainable until the new build is ready in January 2021, as the budget available to the school will become tighter and the school only has £10k in reserve, which will inevitably lead to staffing reductions and an impact on the educational offer to learners.

4. Increase community use of the building: *One objector suggested that this could keep the school viable.*

Council response: The local authority notes that there is already a well-used community hall in the village so this extra space is not needed.

2.17 Process

Challenge has been made on the following areas of the process:

1. *The council did not carry out a survey on the impact of their decision on the Welsh language, contrary to the 2011 Welsh Language Measure, and the school should not be closed until the complaint made to the Welsh Language Commissioner has concluded.*

Council response: A Welsh Medium Impact Assessment was produced as is required by the School Organisation Code and this has been updated throughout the different stages of the process. The most recent version is attached at Appendix B. The council has responded to the Commissioner.

2. *The impact on children with Special Educational Needs has not been considered.*

Council response: All schools must appropriately support their learners with additional learning needs. All pupils, including those with SEN would be appropriately supported by the local authority and the school throughout transition to their new school, including support from Education Psychologists and visits to the new school to meet new classmates and get familiar with the new school building. The required level of intervention would be provided by that new school, and staff training would be provided if required to prepare for individual learners.

3. *Stats used are challenged; the most current educational provision has not been assessed/included; documents are biased/decision already made.*

Council response: The local authority is satisfied that all of the statistics used comply with the requirements of the School Organisation Code and there has been no bias or predetermination.

4. *Not following the new School Organisation Code which includes Felindre as a small and rural school and therefore requiring additional steps to be taken in the closure process.*

Council response: The new School Organisation Code had not been published when this proposal commenced, and the Welsh Government confirmed that it would not apply to any proposals that were already out to consultation, as was the case with Felindre. Nevertheless, the council acted within the spirit of the new Code regardless.

5. *Not following the Wellbeing of Future Generations Act.*

Council response: Swansea Council acts in accordance with the Well-being of Future Generations (Wales) in all it does. Sustainable development has been a central organising principle since 2012 and each year the Council aims to further embed and build on sustainable practice. The focus is on integrating behaviour change so that the five ways of working and maximisation of each of the national well-being goals is implicit in how services operate as a whole Council.

- Integration - Our Corporate Plan 'Delivering a Sustainable and Successful Swansea' sets out how the organisation applies the five ways of working and maximises contribution to each of the national well-being goals. We believe this decision aligns with not only the Well-being Objective 'Improving Education and Skills' but other well-being objectives.
- Swansea's Local Well-being Plan prioritises Local Well-being Objectives for collective action. The achievement of Local Well-being Objectives are not threatened by this decision.
- As this body of evidence demonstrates wide ranging impacts across the well-being goals have been documented. Swansea Council considers these issues not only individually by addressing specific concerns in isolation but by considering informally the collective impact on well-being and how issues raised can impact on wider well-being. This indirectly considers the collective impact on the seven well-being goals as a set.
- Long term - The decision takes account not only of the well-being of learners currently at Felindre but the well-being of all Swansea's learners today and in the future. This includes taking account of long-term trends that inform the development of the Council's policies and strategies.
- Prevention - The Council has acted having identified adverse impacts on future learning and sustainability. This decision aims to stop or prevent problems getting worse.
- Collaboration - The consideration of impacts on social, economic, environmental and cultural well-being has been informed both by the expertise of services across our organisation and from external organisations such as the Audit Commission.

- Involvement- The consultation document demonstrates considerable involvement activities with those with an interest or who were affected by the proposal in a way that reflects the diversity of the population.

3. Financial Implications

Capital

- 3.1 The new build schools for YGG Tan-y-lan and YGG Tirdeunaw will be funded from two sources:
- (i) The traditional capital stream of the Welsh Government funding for Band B of the 21st Century Schools Programme, with an overall grant rate of 65%. The total estimated cost of the new build for YGG Tan-y-lan and YGG Tirdeunaw for this funding stream is £20.631m, with £18.342m against the overall Band B programme's envelope of £141.6m (excluding the potential aided sector project, which is assumed to require no Council contribution).
 - (ii) The estimated cost of the additional 0.5 form entry (105 full-time pupil places plus nursery) for both schools is £2.289m, which is from the approved Welsh Government's Welsh Language Capital Grant
- 3.2 The Welsh Government have approved in principle the overall Band B funding envelope subject to the specific approval of each individual scheme business case. As such there is no specific approved budget for any individual scheme. The funding mechanism and timescale for delivery is still to be confirmed with the Welsh Government, and the delivery of all the schemes is dependent on final approval of Band B funding and the specific additional Welsh Government capital grant.
- 3.3 Cost estimates are on a current-cost basis, with no allowance for construction inflationary pressures, where there is uncertainty regarding the timing of projects. However, optimism bias has been applied to each project in accordance with the lessons learned from delivery of Band A, and based on assessment of outstanding programme risks/unknowns.
- 3.4 The approval in principle of the Strategic Outline Programme for Band B does not commit the council to the indicative funding contributions set out above since the final approval of any capital allocation from the Welsh Government is subject to the submission of further detailed business cases in respect of each specific project. Further reports will come to Cabinet for each project within the approved programme, which will include developed cost plans for each project following the further development of options appraisals and detailed design.
- 3.5 The future of the current YGG Felindre site would be considered should this proposal be approved. In accordance with current policy, any capital receipt generated from a future disposal of the Felindre site will contribute towards the council's overall capital receipt target to fund the capital programme and will not be allocated for any other specific purpose.

Revenue

- 3.6 Schools are funded from an overall delegated budget – the Individual Schools Budget (ISB). There is a funding formula that allocates a budget share to each individual school from the ISB. The budget share for the school receiving the learners from YGG Felindre would increase to include the number of learners moving there. Any additional delegated revenue savings from the closure of YGG Felindre will be reinvested into the ISB for the benefit of all pupils in Swansea. The FY2018-2019 revenue funding per pupil for YGG Felindre of £8,815 compares with an average for primary schools in Swansea of £3,487.
- 3.7 Closure of schools can lead to some initial increased costs, for example redundancy costs and transport costs. Although we would recommend to governors at the school receiving the learners from YGG Felindre that all new posts to support the additional learners are ring-fenced to existing employees at YGG Felindre, there could be some staff that are not successful in matching against a post. If these staff were not successfully redeployed elsewhere, or did not wish to take up voluntary redundancy or early retirement options, there could be redundancy costs that are currently charged to central budgets.
- 3.8 There will be additional transitional transport costs whilst existing pupils are protected from the impact of catchment changes but in the longer term modest overall savings would be anticipated overall as a greater proportion of pupils have access to places nearer to home. Pupils living in the Felindre catchment area will incur ongoing transport costs of approximately an additional £4k per year due to distance to their new school and there being no available walking route (note that there is currently a cost of £11k to transport pupils to Felindre).

4. Legal Implications

- 4.1 The establishment, alteration or discontinuance of maintained schools requires consultation and the publication of statutory notices in accordance with Chapter 2 and Schedule 2, of the School Standards and Organisation (Wales) Act 2013 (“the Act”) and the Welsh Government’s School Organisation Code (Circular 006/2013) (the Code). The Code provides statutory guidance a Local Authority must follow when seeking to making school organisation proposals to education provision within a Local Authority area. Because these proposals were published before 1st November 2018 when the new Code was published, it is specified that the 2013 Code must be followed.
- 4.2 Part 1 of the Education Act 1996 (“the 1996 Act”) imposes a number of general duties on all local authorities in Wales. The general duty in section 13 of the 1996 Act is to contribute (so far as the Council’s powers enable them to do so) towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education and secondary education are available to meet the needs of the population of their area.
- 4.3 Section 13A(3) of the 1996 Act states that a local authority in Wales must ensure that their relevant education functions and their relevant training functions are exercised by the authority with a view to promoting high

standards, and promoting the fulfilment of learning potential by every person to whom the subsection applies, including those who are of compulsory school age or are below school age and are registered as pupils at schools maintained by the authority.

- 4.4 Section 14 of the 1996 Act then provides that the Council shall secure that sufficient schools for providing primary education and secondary education are available in the Council's area. Schools available for an area shall not be regarded as sufficient unless they are sufficient in number, character and equipment to provide for all pupils the opportunity for appropriate education. Appropriate education means education which offers such variety of instruction and training as may be desirable in view of:
- (a) the pupils' different ages, abilities and aptitudes; and
 - (b) the different periods for which they may be expected to remain at school, including practical instruction and training appropriate to their different needs.
- 4.5 Before publishing any proposals relating to the discontinuing a school under s43 of the Act, or making a Regulated Alteration under s42 the Authority (Proposer/s) is under a duty, by virtue of s48 of the Act, to consult on such proposals. Guidance has been issued by the Welsh Government in Circular 011/2013 entitled the "School Organisation Code" which must be followed:
- a) At the start of the consultation period Proposers must provide consultees with a consultation document and give them at least 42 days in which to respond, with at least 20 of these being school days.
 - b) Consultation comments must be collated and summarised by Proposers. This summary together with the responses to the comments must be published in a consultation report within three months of the end of the consultation period.
 - c) A decision must be made by Proposers whether to proceed with changes within 6 months of the end of the consultation period.
 - d) If a decision is made to proceed, a Statutory notice is published providing a 28 day notice period for objections. The notice must be published on a school day and with 15 school days (not including the day of publication) in the notice period.
 - e) If objections are received, an objection report must be published providing a summary of the objections with responses to them before the end of 7 days beginning with the day of the Proposers determination of the proposals.
 - f) The Proposer must determine under s53 whether the proposals are to be implemented. Proposals must receive final determination within 16 weeks of the end of the objection period. Local determination is a requirement of the School Organisation Code, and The Local Authorities (Executive Arrangements) (Functions and Responsibilities) (Wales) (Amendment) Regulations 2013 allow for this local determination. The Welsh Ministers and Governing Bodies are to be notified of the decision within 7 days of the decision.
 - g) If the Proposer determines to implement proposals, they should be implemented in accordance with the date given in the statutory notice, or any subsequent modified date.

- 4.6 The proposer must publish a report on the consultation it has carried out in accordance with the Code. The consultation report must summarise each of the issues raised by consultees, responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and setting out Estyn's view (as provided in its consultation response) of the overall merits of the proposal.
- 4.7 The School Organisation Code specifies the detail that the equality and community impact assessments must cover and full consideration needs to be given to these before any decision is made.
- 4.8 The Code includes statutory guidance to which the Council must have due regard and sets out the policy context, general principles and factors that should be taken into account by those bringing forward proposals to reconfigure school provision and by those responsible for determining proposals. Where guidance is given by the Code, it is stated that relevant bodies should follow this guidance unless they can demonstrate that they are justified in not doing so.
- 4.9 Paragraph 1.1 of the Code sets out the key background principles and policies, which should be taken into account by the Council in developing school organisation proposals. These include:
- United Nations Convention on the Rights of the Child;
 - A living language: a language for living – Welsh Language Strategy 2012-2017
 - Welsh- medium Education Strategy;
 - One Wales: One planet, a new sustainable development scheme for Wales May 2009 or any successor strategy;
 - Child Poverty Strategy for Wales (issued February 2011 Information document number 95/2011), or any successor strategy;
 - Faith in Education.
- 4.10 In addition, when developing school organisation proposals, the local plans to which Council should have regard include the following:
- Local plans for economic or housing development
 - Welsh in Education Strategic Plans (made under part 4 of the 2013 Act)
 - Children and Young People's Plans (or successor plans)
 - 21st Century Schools – Capital Investment Programme and the relevant wave of investment
- 4.11 Finally, the Council should have regard to the following Welsh Government Guidance on related matters:
- Learner Travel Operational Guidance
 - Measuring the capacity of schools in Wales, Circular
- 4.12 Chapter 1 then lists a number of factors which should be taken into account by relevant bodies, including the Council, when exercising their functions of preparing and publishing school organisation proposals or approving/determining them. These factors include:

- Quality and standards in education (looking at outcomes, provision, leadership and management) at the school which is the subject of the proposals, and at any other school or educational institution which is likely to be affected. The Code states that local authorities should place the interests of learners above all others. Where proposals involve the transfer of learners to alternative provision, there should normally be evidence that the alternative would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners.
- The need for places and the impact on accessibility of Schools (whether alternative school based provision will have suitable capacity and provide accommodation of at least equivalent quality and is sufficient to meet existing demand and projected demand and the nature of journeys to alternative provision and resulting journey times for pupils, including SEN pupils. In particular, whether primary school pupils will have one way journeys in excess of 45 minutes or secondary school pupils one way journeys of over an hour.
- Resources of education and other financial implications. This involves a consideration of a number of factors set out in the Code, including whether proposals ensure a fairer and more equitable distribution of funding between mainstream schools, what effect proposals will have on surplus provision, the costs of proposals (including additional transport costs), any projected net savings, any budget deficits of schools affected and whether the proceeds of sales of redundant sites remain in the education budget.

4.13 The Code also lists other general factors which should be taken into account, namely educational attainment, equality issues, charitable interests (paragraph 1.6). A list of specific factors in the consideration of school closures is at paragraph 1.7. This states that there is no presumption in favour or against the closure of any type of school. The case for closure should be robust and in the best interests of educational provision in the area. A Community Impact Assessment should be obtained. When considering whether closure is appropriate, special attention should be given to the matters set out on page 12 of the Code, including:

- considerations of alternatives to closure, including multi-site schools, clustering/collaboration/federation with other schools
- the overall effect of closure on the local community
- how parent's and pupil's encouragement with the alternative school and any facilities it may offer could be supported.

4.14 In addition to the usual considerations in relation to standards of provision, the Council should also consider whether proposals will improve standards of accommodation for pupils with SEN, including building accessibility;

- how proposals will address any health, safety and welfare issues;
- how proposals, where appropriate, will support increased inclusion; and
- the impact of proposals on other SEN provision within the immediate and wider local authority area including out of county where appropriate.

- whether there is a need for a particular type of SEN provision within the area;
 - whether there is surplus SEN provision within the area;
 - whether SEN provision would be more effective or efficient if regional provision were made; and
 - the impact of proposals on the transportation of learners with SEN.
- 4.15 The list of factors to be taken into account in approving/determining school organisation proposals is listed at paragraph 1.14.
- 4.16 Paragraph 5.1 of the Code makes provision for the publication of objection reports. Proposers must publish a summary of the statutory objections and the proposer's response to those objections. Where a local authority is required to determine its own proposals, the Objection Report must be published before the end of 7 days beginning with the day of its determination. The Objection Report must be published by being posted on the local authority's website. Hard copies must be made available on request. Parents, carers and guardians and staff members of schools which are the subject of the proposals must be advised of the availability of the Objection Report. The Code contains a list of individuals or bodies which must receive either a hard copy of the Objection Report or be emailed a link to the local authority's website.
- 4.17 The Well-being of Future Generations (Wales) Act 2005 mandates that public bodies in Wales must carry out sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the 'well-being goals'.
- 4.18 The 'well-being goals' are:
- (i) a prosperous Wales, meaning an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work;
 - (ii) a resilient Wales, meaning a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change);
 - (iii) a healthier Wales, meaning a society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood;
 - (iv) a more equal Wales, meaning a society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances);
 - (v) a Wales of cohesive communities, meaning attractive, viable, safe and well-connected communities;

- (vi) a Wales of vibrant culture and thriving Welsh language, meaning a society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation; and
- (vii) a globally responsible Wales, meaning a nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

4.19 Any reference to a public body doing something in accordance with the 'sustainable development principle' means that the body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

4.20 In order to act in a sustainable manner a public body must take account of:

- (1) the importance of balancing short-term needs with the need to safeguard the ability to meet long-term needs, especially where things done to meet short-term needs may have detrimental long-term effect;
- (2) the need to take an integrated approach, by considering how
 - (a) the body's well-being objectives may impact on each of the well-being goals); and
 - (b) the body's well-being objectives impact on each other or on other public bodies' objectives, in particular where steps taken by the body may contribute to meeting one objective but may be detrimental to meeting another;
- (3) the importance of involving other persons with an interest in achieving the well-being goals and of ensuring those persons reflect the diversity of the population of
 - (a) Wales (where the body exercises functions in relation to the whole of Wales); or
 - (b) the part of Wales in relation to which the body exercises functions;
- (4) how acting in collaboration with any other person (or how different parts of the body acting together) could assist the body to meet its well-being objectives, or assist another body to meet its objectives;
- (5) how deploying resources to prevent problems occurring or getting worse may contribute to meeting the body's well-being objectives, or another body's objectives

4.21 Swansea Council applies the Well-being of Future Generations Act (Wales) 2015 as the core principle guiding how the local authority operates.

4.22 The action a public body takes in carrying out sustainable development must include:-

- Setting and publishing objectives ('well-being objectives') that are designed to maximise its contribution to achieving each of the well-being goals; and
- Taking all reasonable steps (in exercising its functions) to meet those objectives

Swansea Council's well-being objectives and steps are set out within the Corporate Plan:

<https://www.swansea.gov.uk/?articleid=6901&articleaction=language>

Local Well-being Objectives are set out within Swansea Public Services Board's Local Well-being Plan (of which the Council is a statutory member).

- 4.23 Report writers and decision makers take due regard to these Plans in order to consider how the proposal impacts upon the Council's 'wellbeing objectives', Swansea's Local Well-being Objectives and the national well-being goals'.
<https://www.swansea.gov.uk/localwellbeingplan>

Contracts

- 4.24 Any offer of grant funding from the Welsh Government will be subject to terms and conditions which will be binding upon the local authority.

Impact Assessments

- 4.25 The School Organisation Code specifies the detail that the equality and community impact assessments must cover in a proposed school closure and full consideration needs to be given to these before any decision is made. In addition, a Welsh language impact assessment has been completed for each proposal. Full consideration should be given to these also.

Legal Property Implications

- 4.26 Section 122 (1) of the Local Government Act 1972 provides that 'a principal council may appropriate for any purpose for which the council are authorised by this or any other enactment to acquire land by agreement any land which belongs to the council and is no longer required for the purpose for which it is held immediately before the appropriation'.

- 4.27 The key procedural points are;

The land must already belong to the Council;

The land must be no longer required for the purpose for which it is currently appropriated; and

The purpose for which the Council is appropriating must be authorised by Statute.

- 4.28 The case of *Dowty Boulton Paul v Wolverhampton Corporation* (1973) established that the local authority is the sole judge of whether or not the land in question is not required for the purpose for which it is held immediately before the appropriation and its decision cannot be challenged in the absence of bad faith.

- 4.29 The Council must be able to demonstrate the purpose for the appropriation and that it has taken all the relevant considerations into account and not taken any irrelevant considerations into account.
- 4.30 The Council's decision must be based on the available evidence and be rational in the sense that it cannot be said that no reasonable local authority could, on the evidence before it, have arrived at that decision: *Associated Provincial Picture Houses Ltd v Wednesbury Corporation* (1948) 1 KB 223).
- 4.31 Any decision to appropriate land must be the subject of a recorded minute, which should evidence that the Council intends to formally appropriate the land under s.122 of the Local Government Act 1972.
- 4.32 The Chief Legal Officer has carried out a report on title on the land and has confirmed that there are no constraints that would affect the proposals.

5. **Equality and engagement implications**

- 5.1 The Council is subject to the Public Sector Equality Duty (Wales) and must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
 - Advance equality of opportunity between people who share a protected characteristic and those who do not
 - Foster good relations between people who share a protected characteristic and those who do not
- Our Equality Impact Assessment (EIA) process ensures that we have paid to regard to the above.

- 5.2 Equality Impact Assessments were commenced as a background paper to the consultations. The EIAs were revised to take full account of the consultation outcomes and the views of the range of stakeholders that were gathered. A further revision has been made to take account of objections made during the statutory notice period. These can be found in Appendix B.

- 5.3 The proposals were found to be relevant to children and young people, older people, other age groups, disability, sex, Welsh language, poverty/social exclusion and community cohesion. The impact on each of these areas is explored further for each proposal as follows.

5.4 YGG Tan-y-lan

0-18 – YGG Tan-y-lan is a Welsh-medium primary school. This project will have a very positive impact on the Education of all the children who attend the school in the future. As we are looking to build the school on a new site this should avoid any disruption to those currently attending the school.

Older People 50+/Any other age group – The staff, parents, carers and wider school community will benefit greatly from improved facilities to deliver

education to all pupils and increase the opportunities for the wider school community to experience and use the Welsh language.

Disability – The design, delivery and implementation of this project will take full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. The design of any new building, the re-modelling and the running of the school in the future will ensure that ALL the pupils and staff can make the most of their improved environment.

Welsh – YGG Tan-y-lan is a Welsh medium primary school and as a result this project will have a positive impact on the Welsh language. The project is part of the wider Welsh in Education Strategic Plan that is looking to increase the number of places available in Swansea’s Welsh-medium schools.

Poverty/social exclusion – There are high levels of deprivation in this area and providing the children and the community with this improved facility could give access to courses for adults and access to additional extra-curricular activities. Due to the possible changes in catchment areas it is important to consider the impact this could have on learners and their families. The extra distance to travel to the new site was mentioned by a couple of individuals during the consultation process. Some pupils will inevitably live further away from the new site and this would increase their travel time, however, the sites are only 0.6 miles apart by available walking route and any pupils more than 2 miles away, or where there is no available walking route, would be offered home to school transport.

Community Cohesion – It is possible that the improved facilities will provide increased opportunities for the community to make the most of the school’s facilities. However, due to the possible changes in catchment areas it is important to consider the impact this could have on community cohesion as the schools moves (0.6 miles) from one community to another. If the proposal goes ahead the school will work with all communities to ensure that the schools continue with its inclusive ethos that brings communities together for the benefit of all.

5.5 YGG Tirdeunaw

0-18 – YGG Tirdeunaw is a Welsh-medium primary school. This project will have a very positive impact on the education of all the children who attend the school in the future. As we are looking to build the school on a new site this should avoid any disruption to those currently attending the school.

Older People 50+/Any other age group – The staff, parents, carers and wider school community will benefit greatly from improved facilities to deliver education to all pupils and increase the opportunities for the wider school community to experience and use the Welsh language.

Disability – The design, delivery and implementation of this project will take full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. The design of any new building, the re-modelling and the running of the school in the future will ensure that ALL the pupils and staff can make the most of their improved environment.

Welsh – YGG Tirdeunaw is a Welsh medium primary school and as a result this project will have a positive impact on the Welsh language. The project is part of the wider Welsh in Education Strategic Plan that is looking to increase the number of places available in Swansea's Welsh-medium schools.

Poverty/social exclusion – There are high levels of deprivation in this area and providing the children and the community with this improved facility could give access to courses for adults and access to additional extra-curricular activities. Due to the possible changes in catchment areas it is important to consider the impact this could have on learners and their families. Some pupils will inevitably live further away from the new site and this would increase their travel time, however, the sites are less than a mile apart by available walking route and any pupils more than 2 miles away or where there is no available walking route would be offered home to school transport.

Community Cohesion – It is possible that the improved facilities will provide increased opportunities for the community to make the most of the school's facilities. Due to the possible changes in catchment areas it is important to consider the impact this could have on community cohesion as the schools moves (less than 1 mile) from one community to another. If the proposal goes ahead the school will work with all communities to ensure that the schools continue with its inclusive ethos that brings communities together for the benefit of all.

5.6 YGG Felindre

0-18 – YGG Felindre is a Welsh-medium primary school. This proposal looks to close the school and move the pupils to a neighbouring Welsh-medium primary school. Although the change can be seen as negative in the first instance, we believe that the children will receive a similar, if not better, education at the designated neighbouring Welsh-medium primary school.

Older People 50+/Any other age group –there is the chance of some redundancies because of this proposal. We would hope for these staff to get work at neighbouring schools; however, this would be a decision for individual governing bodies.

Disability – The design, delivery and implementation of this proposal will take full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. If the proposal were to be approved, and other proposals

for new Welsh-medium school buildings were approved this would be hugely beneficial to any learner that has a disability. The modern learning environment would be designed and built whilst taking full notice of all the needs of current and future learners, staff and the wider community.

Welsh – YGG Felindre is a Welsh-medium primary school and although the proposal is to close a Welsh-medium primary school the proposal is part of the wider Welsh in Education Strategic Plan that is looking to increase the number of places available in Swansea's Welsh-medium schools. During the consultation it has been raised that the proposal doesn't take into account Standards 91-93 of Swansea Council's Compliance Notice under the Welsh Language Measure whereas the proposal could impact on opportunities for persons to use the Welsh language, and that we could be treating the Welsh language no less favourably than the English language.

The Council's wider Welsh in Education Strategic Plan seeks to increase the number of Welsh-medium places in Swansea significantly. As a result of proposals to reach our targets we believe that this would increase opportunities for more people to use the Welsh language and ensure that the Welsh language is treated no less favourably than the English language. The increase in Welsh-medium places will see Swansea playing its part in the Welsh Government's target of having one million Welsh speakers in Wales by 2050.

If the proposal were to go ahead we would expect the Mawr ward to become part of the designated school's community and play an active role in the life of the school. The village hall and local church could still have a large part to play in this.

Poverty/social exclusion – There are low levels of deprivation in this area and therefore the impact on poverty/social exclusion is expected to be low. However, due to the possible changes in catchment areas it is important to consider the impact this could have on learners and their families. The large majority of current pupils at the school live outside of the YGG Felindre catchment area and therefore would likely be living closer to the designated school meaning a shorter distance to travel. Those who live more than 2-miles from the designated school would be offered transport as per the Council's Home to School Transport Policy.

Community Cohesion – It is possible that the proposed closure could have a negative impact on the local community. However, we would expect the designated school to ensure that the community becomes part of the school's community. There is no reason why the local church and village hall cannot be used for such partnerships to flourish.

Sex – Given that most of the staff at the school are female, it is clear that this proposal would have a disproportionate effect on this group.

- 5.7 The remaining protected characteristics (namely Race, Asylum Seekers, Gypsies and travellers, Religion, Sexual Orientation, Gender reassignment, Carers, Marriage and civil partnership, Pregnancy and maternity) have all been identified as 'neutral' as we do not believe the proposal will have either a negative or a positive impact on them. However, this will continue to be monitored and reconsidered throughout the process.
- 5.8 To ensure that we understood how these proposals affected all stakeholders we consulted widely to allow us to shape this proposal and agree the way forward.
- 5.9 As stated earlier in this report, a full consultation was conducted with all interested stakeholders from 5 September 2018 to 18 October 2018.
- 5.10 All initiatives must be designed/planned in the best interests of children and young people.
- 5.11 The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.
- 5.12 The proposals will directly affect children and all future arrangements will aim to ensure that these children and young people achieve the best possible outcomes. The proposal relates to the following articles of the United Nations Convention on the Rights of the Child:
- Article 3 - All organisations concerned with children should work towards what is best for each child.
- Article 12 - Respect for the views of the child
- Article 18 - Both parents share responsibility for bringing up their children. We should help parents by providing services to support them.
- Article 28 - Children have a right to an education. Discipline in schools should respect children's human dignity.
- Article 29 - Education should develop each child's personality and talents to the full.
- Article 30 - Children have a right to learn and use the language and customs of their families.
- 5.13 A Community Impact Assessment and Welsh Impact Assessment was produced for each proposal and has been available throughout the consultation period on the Council's website <https://www.swansea.gov.uk/schoolconsultations2018>. Where necessary these have been amended following the consultation and objection periods. The assessments for YGG Felindre still recognises that there is very limited use of the school by the community and that there is a well-used community hall in Felindre.

- 5.14 Swansea Council acts in accordance with the Well-being of Future Generations (Wales) Act in all it does. Sustainable development has been a central organising principle since 2012 and each year the council aims to further embed and build on sustainable practice.

The focus is on integrating behaviour change so that the five ways of working and maximisation of each of the national well-being goals are implicit in how services operate as a whole council.

Long term - The proposals ensure the long term sustainability of education in the wider communities and sufficient school places to meet the needs both now and in the future across the county.

Prevention - The proposal for YGG Felindre seeks to prevent the escalation of issues in relation to the sustainability of appropriate standards of educational provision for pupils, particularly with the demographic profile of the area, an anticipated continuing decline in pupil numbers, and the implications of the new curriculum, so continuing to offer children the best start in life. The proposals are an integral part of a wider WESP strategy, approved by Swansea Council and the Welsh Government, which will deliver significant additional Welsh-medium places to meet continuing growth in demand.

Integration - The decision making process has taken into account the wider Swansea context by being aware of the local wellbeing objectives set out in Swansea's Local Wellbeing Plan. The impact on integration is neutral because we are ensuring that all school learners have a place and therefore it is not anticipated that it will impact on other agencies such as social services and health. The proposals also support the Welsh Government in delivering their wellbeing objectives and are in line with the WESP strategy to support a vibrant and thriving Welsh language.

Collaboration - The proposals have been developed across the council and consultation with stakeholders has been wide, as per the School Organisation Code. The proposals also support the Welsh Government in delivering their wellbeing objectives and are in line with the WESP strategy to support a vibrant and thriving Welsh language.

Involvement - Rigorous consultation processes have been followed and there was also significant early engagement of stakeholders prior to any Cabinet reports being considered.

6. Conclusion

- 6.1 In approving and determining school organisation proposals, Cabinet needs to take into account a number of factors:

6.1.1 Quality and Standards of Education

That they are satisfied that the proposals would deliver outcomes and offer provision at least equivalent to that which is currently available to learners, including those with special educational needs.

YGG Tan-y-lan and YGG Tirdeunaw – As the proposals are to move the schools to new sites, officers are satisfied that the proposals will deliver outcomes and offer provision at least equivalent to that which is currently available to learners, including those with special educational needs

YGG Felindre - Officers are satisfied that YGG Tan-y-lan will provide at least equivalent outcomes and provision to that which is currently available to learners, including those with special educational needs.

6.1.2 Need for Places and the Impact on Accessibility of Schools

For school closure, they must be satisfied that the alternative school has sufficient capacity and provides accommodation of at least equivalent quality for existing and projected pupil numbers. The alternative provision should be of the same nature with regard to language category. Travel time for primary aged learners should not exceed 45 minutes and sustainable transport should be encouraged.

For increasing a school's size, there should be evidence of future demand.

Officers are satisfied that there is sufficient capacity at YGG Tan-y-lan, initially at the Morriston Site in September 2019 and in particular when the school moves to the new increased size building in January 2021. There is increasing demand for Welsh-medium places and the Welsh Capital Grant has been provided by the Welsh Government to create demand by enhancing capacity. YGG Tan-y-lan has the same language category and learners will not travel for more than 45 minutes. The wider catchment area changes will reduce transport requirements for many learners and will provide a better spread of pupils into available places across the county.

6.1.3 Resourcing of Education and Other Financial Implications

It is important that funding for education is cost effective. Proposals should ensure a fairer and more equitable distribution of funding between schools. They should also address surplus capacity in schools, particularly if they have "significant" levels, defined as 25% or more of a school's capacity and at least 30 places. Proposals that are part of the 21st Century Schools Investment Programme contribute to the delivery of sustainable schools and the school estate but removing maintenance backlogs and school buildings that are inefficient or in poor condition. The comparative cost of proposals should also be considered, as well as if the affected schools would face budget deficits.

Officers are satisfied that the proposal for YGG Felindre will ensure a fairer distribution of funding between schools. YGG Felindre had 87.1% (81) surplus places at September 2018. YGG Tan-y-lan and YGG Tirdeunaw are part of the 21st Century Schools Programme and the proposals will remove backlog maintenance at these schools as well as at YGG Felindre.

6.1.4 Community Impact

Cabinet should consider how any community facilities provided by the school could be maintained. They should also pay attention to whether alternatives to closure have been considered.

Officers have identified that only a parent and toddler group use the school building at YGG Felindre in the Community Impact Assessment. Officers do not consider there to be any alternative to closure.

6.1.5 General Factors

Cabinet should also consider the impact the proposals will have on children from economically deprived backgrounds and equality issues.

Officers have not raised any concerns through the Equality Impact Assessments.

6.2 When approving or determining proposals, relevant bodies:

- must consider whether there are any other related proposals
- must ensure that the statutory consultation has been conducted in accordance with the School Organisation Code
- must ensure that the proposal has been published in accordance with the Code and the notice contains all the required information
- must consider the consultation document and consultation report
- must consider the objections and the objection report and any responses to the notice supporting the proposals

6.3 Officers are satisfied that the proposals meet all of the requirements above and recommend that Cabinet approve all three proposals.

Background Papers:

- Report to Cabinet 21 June 2018
- Report to Cabinet 20 December 2018
- School Standards and Organisation (Wales) Act 2013
- Welsh Government School Organisation Code (Circular 006/2013)
- School Standards and Framework Act 1998
- The Education (Determination of Admission Arrangements) (Wales) Regulations 2006
- Welsh Government's Admissions Code (Circular 005/2013)

Appendices:

Appendix A	Draft Objection Report for YGG Felindre
Appendix B	Equality Impact Assessments and Welsh Medium Impact Assessments
Appendix C	RhAG full response during the statutory notice period
Appendix D	Evidence of leadership support given to YGG Felindre



Cyngor **Abertawe**
Swansea Council

Objection Report:
Proposal to Close YGG Felindre

This report is published in line with requirements under section 49 of the School Standards and Organisation (Wales) Act 2013

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DRAFT

1. BACKGROUND

Ysgol Gynradd Gymraeg (YGG) Felindre is situated in the village of Felindre in Swansea. At January 2018, it had 20 full-time (FT) pupils on roll from the ages of 4 to 11, plus 2 part-time nursery children. There were two mixed-age classes in the school. The number on roll has been declining for the last five years. Updated information for September 2018 recorded only 12 FT pupils on roll plus 2 nursery and this reduced further to 10 FT pupils in January 2019, and these are all being taught in one class.

The last Estyn inspection of the school was in February 2015 with the school's performance being adequate at the time and with adequate prospects for improvement and was placed in a category of Estyn monitoring. The school was removed from Estyn monitoring in October 2016 after considerable support from the local authority and investment of time by school staff. The Estyn report can be found here: <https://www.estyn.gov.wales/provider/6702133>

The school has not been able to fill their headteacher vacancy and the local authority has provided three acting headteachers for the school since 1 January 2017.

The local authority has consulted on a proposal to close YGG Felindre with effect from 31 August 2019. It is proposed that the current catchment area is transferred to YGG Tan-y-lan, with a new build school proposed for that school for January 2021.

Following consultation, Cabinet considered the responses received and agreed to move the proposal forward to the publication of a statutory notice, as is required by the School Standards and Organisation (Wales) Act 2013. The notice was published on 9 January 2019 and objections were invited until 6 February 2019.

2. OBJECTIONS TO THE STATUTORY NOTICE

363 written objections were received to the YGG Felindre closure proposal (9 of these being after the end of the objection period). 337 of these objections were in the form of a standard letter, with 56 of these being from residents of Felindre, 111 being from residents of the wider Swansea area and 170 being from people living outside of the Swansea area. The vast majority of the standard letters were facilitated by Cymdeithas yr Iaith Gymraeg and were sent from the one email address with different names and addresses noted in each email/letter.

A petition was received stating, "We need your help! The L.A. proposes to close our amazing, welsh medium school. We are fighting to keep it open. Felindre is one of the last villages in the Swansea area, where welsh is still spoken as a first or second language on a daily basis", signed by 195 people.

One objector had sent in an open letter to elected members in Swansea that had the names of 124 people listed as supporting the statement.

The objections were:

	Point Raised	Local Authority Response	Number of Written Responses Raising Point	% of Written Responses Raising Point
	Travel/Transport			
1	What is the point of paying to take children out of the village by car or bus when they could walk to school?	There are only a small number of children on roll in Felindre from the catchment area. It is more efficient to transport these pupils than continue to maintain a school. Learners only walk to school if there is an available walking route, which is not the case for all learners in Felindre. However, they would usually need to walk to a meeting point for any bus/taxi pick up.	1	0.3%
2	Breakfast and after school clubs will not be an option for those having home to school transport. Is this fair and equitable for all children that will be attending YGG Tan-y-lan?	Parents need to pick up and drop off their children for out of school activities in most schools, including Tan-y-lan. If the proposal is approved discussions could take place with parents on the potential of providing the transport earlier for learners to attend breakfast club, should the demand be there.	2	0.6%
3	Will all children living in the Felindre catchment area, now and in the future, be guaranteed a free bus service to their new school as it is more than 2 miles and there is no safe walking route?	Yes, all those living in the Felindre catchment area would be eligible for a transport assessment and this would be the case in future, as per Welsh Government requirements.	1	0.3%
			0	0.0%
	Size of School		0	0.0%
4	The school nurtures children who would not thrive in a bigger school. How does the council guarantee that all children who are current pupils are comfortable at the two new sites?	A class teacher will support all learner needs appropriately. Learners would be moved to one site, unless parents choose to take their child elsewhere, and transition will take place for each individual learner based on their own needs.	4	1.1%
5	Older pupils look after the younger pupils in a small school. Mixing ages and abilities generates a nurturing and tolerant atmosphere, which	Children will work across age groups in all schools and it is common practice for older children to support younger children.	2	0.6%

	is good for personal and social development.			
6	Being a rural primary, learners show respect for others and are caring, having a positive impact on their peers when they move to secondary.	Children in all areas of Swansea can show respect for others.	1	0.3%
7	Deprives children of the benefit of education in smaller schools with smaller class sizes. Some parents have chosen to bring their children from out of catchment to Felindre because it is small.	This proposal is about the quality and sustainability of education at YGG Felindre. All children are currently taught in one classroom covering nursery to Year 6. Staff expertise is required for the six areas of learning proposed for September 2022, as well as literacy, numeracy and digital competency skills. Regional ERW School Improvement officers believe that these skills and expertise may not be shared sufficiently, and that teaching ten pupils would make it difficult to meet learners needs. In addition, meeting the needs of learners with additional learning needs, as well as the breadth of areas of learning and experience, would be difficult for a single teacher to address. ERW School Improvement officers also believe that the current statutory curriculum with twelve subjects and a range of ages and abilities would present a workload issue for a single teacher with such a broad range of age, development stage and ability in one class. The officers believe that the only educational argument to keep Felindre would be that pupils would benefit from a high pupil teacher ratio and this can lend itself to pupil well-being and a positive relationship with the teacher. However, well-being alone does not cater for the learning needs of children. For the reasons stated above, it would be challenging for teaching and learning to be satisfactory across all age ranges in a single classroom and this could negate the positives gained in a small class size	2	0.6%
8	In small schools, participating in sporting and cultural activities is not dominated by the most talented or the most confident. Everyone gets a chance.	This proposal is about the quality and sustainability of education at YGG Felindre. All children are currently taught in one classroom covering nursery to Year 6. Staff expertise is required for the six areas of learning proposed for September 2022, as well as literacy, numeracy and digital competency skills. Regional ERW School Improvement officers believe that these skills and expertise may not be shared sufficiently, and that teaching ten pupils would make it	1	0.3%

		<p>difficult to meet learners needs. In addition, meeting the needs of learners with additional learning needs, as well as the breadth of areas of learning and experience, would be difficult for a single teacher to address. ERW School Improvement officers also believe that the current statutory curriculum with twelve subjects and a range of ages and abilities would present a workload issue for a single teacher with such a broad range of age, development stage and ability in one class. The officers believe that the only educational argument to keep Felindre would be that pupils would benefit from a high pupil teacher ratio and this can lend itself to pupil well-being and a positive relationship with the teacher. However, well-being alone does not cater for the learning needs of children. For the reasons stated above, it would be challenging for teaching and learning to be satisfactory across all age ranges in a single classroom and this could negate the positives gained in a small class size</p>		
9	<p>Parents should have the option to choose a small rural school. Is it the council's intention to close all of the small schools? Why are the council targeting the only remaining Welsh-medium small school?</p>	<p>Swansea Council will be keeping the sustainability of all small schools under review.</p>	2	0.6%
10	<p>There is not enough explanation about why the pupil numbers have dropped. Research should be done to find out why parents took their children from the school. In the consultation period it was suggested that it could be because of former staffing. Council did not answer this after consultation.</p>	<p>Parents have the choice to admit their children where there is space. The issue with Felindre is lack of demand each year at the year of admission.</p>	1	0.3%
11	<p>The new governing body had started a recruitment drive before the closure proposal was announced. The pupil numbers have dropped due to uncertainty over the future of the school.</p>	<p>Pupil numbers had fallen before the closure proposal was announced. There is no indication that numbers will increase.</p>	5	1.4%

12	The council should promote the school to increase pupil numbers. This could take pressure off oversubscribed schools, particularly in the Morryston area.	It is the responsibility of the school to promote itself. The council cannot promote one school over another. Council has gone to statutory notice to increase the size of both of the neighbouring Welsh-medium primary schools and to relocate them into new buildings and there have not been any objections to these proposals. This will more than address any overfilled schools in the area and will allow plenty of space for Felindre pupils to transfer.	2	0.6%
13	Do not agree with pupil projections. There are proposed housing developments in the area.	Future potential housing developments have been considered, however, the timescale and nature of any such developments remain uncertain and the future need for educational provision would be intrinsically linked and outside of the village itself.	3	0.8%
	Current School/Site			
14	Maintenance at the school has stopped to save money, as have a number of contracts - but shouldn't the council invest in the buildings?	Schools have funding delegated to them for repairs and maintenance as well as for contracts. The Council has responsibility for capital maintenance of all schools and this is undertaken on a priority basis.	1	0.3%
15	Felindre has plenty of open space, access to a large playing field, multi-use games area and unlimited access to the village hall, and all within walking distance to the Lliw Reservoirs, to which the children often take nature walks. Felindre school is a valuable cultural asset to the community having been part of village life since 1877. It allows the wellbeing of pupils, allowing them to thrive in a vibrant and nurturing environment.	Externally, the site has some attractive features, and access to the nearby community hall and sports area, but the site falls short of the Building Bulletin 99 minimum site areas.	131	36.1%
16	Felindre school has become a hub for other schools in the last few months, bringing in children from other Welsh schools to take part in activities such as sports, forest schooling and our local Eisteddfod, leaving them all the more richer for their experiences here. The loss of Felindre School will have a vast	Noted. YGG Tan-y-lan and YGG Tirdeunaw could have their own new sites in January 2021 that will be designed to support a 21st century curriculum and will include sport and grassed areas as well as landscaped grounds. This is already the case at YGG Lon-las.	133	36.6%

	impact on these surrounding Welsh schools.			
17	Felindre has never been treated on the same level as other Welsh-medium schools in the county.	This is an unfounded statement. Felindre has been given far more support than other Welsh-medium schools because of its amber categorisation and because of its inability to attract a headteacher.	2	0.6%
18	Felindre is not just a village school, it is part of the Welsh-medium schools' network across the county, and it should be treated as part of the solution and not part of the problem.	Agree that the Welsh-medium primary schools have a strong network and there is indeed a countywide strategy set out in the Welsh Education Strategic Plan.	2	0.6%
19	Has the council tested air pollution on the three school sites in line with the principles of the Wellbeing of Future Generations Act? Has the council carried out an assessment of the various sites for the purposes of the children's health and safety?	The new build school will have plenty of green space for outdoor play, and will include the different outdoor areas, such as an mini all-weather pitch (for hockey, football, rugby, tennis etc.), a MUGA (multi use games area on hard standing) and also a marked out grass sports area. Health and Safety is considered for all stages of a new school build, from design through to the management of the school. The council has not monitored air pollution at YGG Felindre as, given its location and the traffic flow, it would fall well below the minimum criteria for assessment. Given our data sets and what we know about the pollutants, it is very unlikely that YGG Felindre would be an area of concern. Air pollution has not been tested for the new Tan-y-lan site as it was not deemed to be an issue given the nature of the building/end usage and location of the site. Nothing has been raised in this regard by any of the consultees in the planning process. The council is required to work to the Welsh Government's 'Local Air Quality Management in Wales - Policy Guidance June 2017' which was	1	0.3%

		produced in-line with the Wellbeing of Future Generations Act but technical guidance sets out how we should approach areas to assess.		
20	Parents choose to send their children to this small and rural site as preferred placements.	The majority of learners on roll are not from Felindre.	1	0.3%
21	What would happen to the vacated school building? Are there any cost implications should closure be the outcome? How would these costs be met? The village does not want a dilapidated building at its centre. If there are plans to develop the site, have local residents been consulted?	There are no plans for the building as no decisions have been made. If the school were to close, the site would be considered for other potential council use before considering disposal.	2	0.6%

	Leadership			
22	There have been a number of headteachers over recent years and this has affected pupil numbers. The local authority must take some responsibility for this, as it did not step in to stop this from happening.	Small schools can struggle to keep headteachers as larger schools can offer more attractive salaries and career progression. The council has supported Felindre by sourcing and funding deputy headteachers to act as headteacher but these quality staff have then been successful in gaining permanent headteacher posts in other schools.	4	1.1%
23	The council should support the governors in appointing a permanent headteacher. Why were efforts abandoned after two advertisements?	Adverts have been placed twice but the governors were unable to appoint in both instances. It would not be sensible to advertise for a headteacher while there is ongoing consultation on a closure proposal.	209	57.6%
24	A permanent headteacher was not appointed before announcing the consultation so the school was not given a fair chance to increase its numbers.	There does not need to be a permanent headteacher in post to announce a school organisation proposal. The school has had a headteacher in place though, albeit acting.	7	1.9%

	Education			
25	<p>The council say that the closure proposal is for educational reasons but they do not appear to have carried out an assessment of the current quality of education at the school. If they have, they have not referred to it. As noted by Estyn in their consultation response, the council has not considered any educational advantages of keeping the school open.</p>	<p>All schools are constantly monitored by ERW, the regional school improvement service. This shows that the school requires much support and is not improving fast enough or showing the ability to self-improve. The consultation paper must include the latest Estyn inspection report, which it did. ERW School Improvement officers believe that the only educational argument to keep Felindre open would be that pupils would benefit from a high pupil teacher ratio and this can lend itself to pupil well-being and a positive relationship with the teacher. However, well-being alone does not cater for the learning needs of children. It would be challenging for teaching and learning to be satisfactory in a single classroom and this could negate the positives gained in a small class size. All children are currently taught in one classroom covering nursery to Year 6. Expertise is required for the six areas of learning proposed for September 2022, as well as literacy, numeracy and digital competency skills. Regional ERW School Improvement officers believe that these skills and expertise may not be shared sufficiently. The officers believe that teaching ten pupils would make it difficult to meet learners needs. In addition, meeting the needs of learners with additional learning needs, as well as the breadth of areas of learning and experience, would be difficult for a single teacher to address. The current statutory curriculum with twelve subjects and a range of ages and abilities would present a workload issue for a single teacher with such a broad range of age, development stage and ability in one class.</p>	11	3.0%
26	<p>Estyn has stated that there is no guarantee that the education will be better in the other two schools.</p>	<p>The School Organisation Code requires an alternative school to be of at least the same educational standard. The alternative is currently of a better standard.</p>	5	1.4%

27	Past pupils have gone on to university and good jobs.	Noted.	2	0.6%
	Wellbeing			
28	The proposal will be stressful for children. The Cabinet member has stated that moving children to a different school is stressful. Details are needed on how the authority plans to alleviate the children's stress.	All children will be offered support and transitional days so that they can get used to the new school and make friends before they move.	2	0.6%
	Welsh Language			
29	There are too few Welsh communities in which the Welsh language continues to thrive for us to afford losing another one of them.	There are only 10 full time learners at the school and only 3 of these live in Felindre. Parents are choosing to send their children out of the village for their education.	215	59.2%
30	The parish of Mawr is the second largest parish in Swansea, and has/Felindre has the largest Welsh speaking population. Therefore, a Welsh speaking school is vital for its survival.		139	38.3%
31	The council have already closed the Welsh-medium primary school in Garnswllt so closing Felindre will remove all Welsh-medium schools from the Mawr parish.		2	0.6%
32	Felindre School is the only Welsh-medium school in the local area and parents seeking a Welsh-language education for their children will be disadvantaged.	Any parent requesting Welsh-medium education will be offered a place for their child.	2	0.6%
33	Felindre is a naturally Welsh speaking village and the children have a local dialect and their fluency in the language is an asset to the secondary school as a high percentage of Bryn Tawe learners are from non-Welsh-speaking homes.	There are very few children attending Felindre and most of these are from out of catchment.	2	0.6%

34	The Welsh language needs to be nurtured in a suitable environment, and Felindre does this through the community (Eisteddfods, youth club, chapel) so that it is a living language and not just a language of the classroom. The Eisteddfod in Garnswllt ended shortly after the school was closed.	As above, we have been informed that recently other schools have attended the Eisteddfod etc. There is no reason why these trips cannot continue to the Mawr ward.	11	3.0%
35	The school should be kept in light of the new proposals for Welsh as a first language in schools.	We are, in parallel, providing increased capacity at the two neighbouring primary schools, in new buildings that will be closer to Felindre.	1	0.3%
36	Can the council provide data on the number of Welsh speakers in the Clase and Penlan communities?	All ward profile information can be found here https://www.swansea.gov.uk/article/1808/Search?q=Ward+Profiles	1	0.3%
37	The school is the heartbeat of daily use of the Welsh language in the village.	There are only 10 full time learners at the school and only 3 of these live in Felindre. Parents are choosing to send their children out of the village for their education.	206	56.7%
38	Goes against the Welsh Government's plan for increasing Welsh speakers. Should keep Felindre open as well as increasing the size of other schools.	This proposal is one part of a wider plan with two new build schools proposed for Tan-y-lan and Tirdeunaw that will provide an increased number of places in buildings that are fit for the 21st Century.	4	1.1%
39	There could be a detrimental effect on the Welsh language as parents may not choose Welsh-medium provision if Felindre were to close.	Children would be offered a place at the new Welsh-medium school. Transport would be provided to their catchment Welsh-medium school. If they did choose English-medium then transport would only be provided to their English-medium catchment school i.e. Llangyfelach Primary School.	1	0.3%
	Community Impact			
40	Closing the school will change the nature and character of this Welsh-speaking village forever.	There are only 10 full time learners at the school and only 3 of these live in Felindre. Parents are choosing to send their children out of the village for their education.	6	1.7%
41	The pupils and school blend into the community.		2	0.6%

42	The presence of a Welsh-medium school in this area means that the connection with the past is still alive. That connection will lapse if the school is closed. There is a great deal of affection for the school, and the history of the school is very much tied with the history of the village.		2	0.6%
43	Voluntary work to support the prosperity and success of the pupils is noted in Estyn inspections.	Noted.	207	57.0%
44	People move to the village for the unique schooling, which large schools cannot provide.	Only 3 learners on roll live in the catchment area.	1	0.3%
45	Impact on the community. The community will become isolated. Travel is not always available or convenient.		3	0.8%
	Timeline			
45	Do not move the children twice in two years, as this is stressful. Leave Felindre open until the new build Tan-y-lan school is ready. Have the cost implications of the two moves been factored into the decision?	Not all learners will move twice. It would only be those currently in Nursery to Year 4. The first move would be into YGG Tan-y-lan where they would integrate into their new classes, and then for the second move they would move with their classmates and their teacher to a new build school. Although any move could be stressful for a child, they will be supported throughout the process, and moving to a new site with better facilities might equally be an exciting prospect. Officers also believe that YGG Felindre would not be sustainable until the new build is ready in January 2021, as the budget available to the school will become tighter and the school only has £10k in reserve, which will inevitably lead to staffing reductions and an impact on the educational offer to learners. Yes, all costs have been factored for the moves.	3	0.8%

	Alternative Options			
47	Council should extend Felindre's catchment area, reflecting the school's status as a designated Welsh-medium school rather than a traditional Welsh-medium school.	Extending the catchment area will not increase the size of the school as parents have a choice over where they send their children to school. Parents that live in Felindre are currently sending their pupils elsewhere but could choose to send them to Felindre if they wished, as there is space. Similarly, if parents outside of Felindre wished to send their children to Felindre now they could. There have been separate proposals to increase the size of neighbouring schools with a review of catchment area to better reflect demand. Changing the catchment area for Felindre would mean that children may have to be bussed into the village when there is already space for them much closer and potentially in new buildings designed for education in the 21st Century. YGG Felindre is already a designated Welsh-medium school and has not been a traditional Welsh-medium school for many years.	216	59.5%
48	Transport children to Felindre from other Welsh-medium schools who do not cope in a large school environment.	Parents could choose to do this now.	1	0.3%
49	Federate with another school. There is not no evidence that the local authority has explored/encouraged all other possibilities including federation.	No other school had been identified that would federate with Felindre when the closure proposal went out for consultation; therefore there was no business case to make the school sustainable. Lon-las have agreed to consider federation if Cabinet decide to keep the school open at their meeting on 21 March 2019 but they have not produced a business case on how they would make the school sustainable. Officer continue to believe that federation will not address the reasons that closure has been proposed. Federation should not be seen as a way to address financial difficulties, as savings are limited, as has been seen in federations across Wales. Some savings can be made if the federation decides to appoint a shared headteacher and deputy	6	1.7%

50	YGG Lon-las governors agreed that they would federate with YGG Felindre at their meeting on 31 January 2019.	<p>headteacher(s) but their pay range usually increases to reflect the increased number of learners across the federation and backfill is needed for deputy headteacher non-contact time when the headteacher is at the other site. Two premises would need to be maintained. The reality of sharing resources across two sites a distance apart is limited. Existing staff cannot be made to work at the other school unless they agree to change the terms of their contract. Federation could mean no guarantee of increase in pupil numbers, making it difficult to provide a curriculum in a single class for a broader range of skill levels than you would normally find in a classroom. As federation does not guarantee movement of teachers between schools, any expertise for the six areas of learning proposed for September 2022, as well as literacy, numeracy and digital competence, may not be shared sufficiently. Regional ERW School Improvement officers believe that teaching ten pupils would make it difficult to meet learners' needs. In addition, meeting the needs of learners with additional learning needs as well as the breadth of areas of learning and experience would be difficult for a single teacher to address. The current statutory curriculum with twelve subjects and a range of ages and abilities would present a workload issue for a single teacher with such a broad range of age, development stage and ability in one class. ERW School Improvement officers believe that the only educational argument to keep Felindre would be that pupils would benefit from a high pupil teacher ratio and this can lend itself to pupil well-being and a positive relationship with the teacher. However, well-being alone does not cater for the learning needs of children. For the reasons stated above, it would be challenging for teaching and learning to be satisfactory in a single classroom and</p>	2	0.6%
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		this could negate the positives gained in a small class size		
51	Although RhAG (Parents for Welsh Medium Education) are supportive of the closure of Felindre and understand the reasons for closure, they would like to see the vacated site used for Welsh-medium education, preferably a Pupil Referral Unit.	The local authority continually monitors demand for specialist provision and there is not enough demand for a PRU, and the new EOTAS service can support Welsh speakers.	1	0.3%
52	Increase community use of the school site to keep it viable.	There is a well-used community hall in the village so this extra space is not needed.	1	0.3%
	Finance			
53	The school is sustainable as it is, so leave it open. The school has £10k in reserves, which is good for a small school.	Budget pressures are increasing on all schools and we believe that Felindre is not sustainable. £10k is a small reserve by comparison with the potential cost and funding challenges that it is likely to face.	1	0.3%

54	Council tax at Felindre is very high yet there will be no school or other amenities.	Council tax is not calculated according to availability of a school. It is mainly calculated on house values.	1	0.3%
55	The benefits of keeping the school open outweigh the short-term financial gains.	The proposal is not for financial gain, it is to improve the educational outcomes for learners now and in the future.	1	0.3%
			0	0.0%
	Staff		0	0.0%
56	As pupil numbers are so low at Felindre it is unlikely that additional staff will be needed at the new school.	HR would work with staff to seek alternative employment within the council.	1	0.3%
	Process			
57	Decision has already been made. Consultation papers were biased.	This is a genuine consultation proposal and decisions have not been made.	1	0.3%
58	You say the proposal is about money and not children yet the documents have much emphasis on sustainability and costs.	The School Organisation Code requires certain financial information to be included.	1	0.3%
59	Staff and Cabinet Members making this decision need to visit the school during a school day to understand how the school works, what it offers its pupils and what it adds to the community.	This is not a requirement of the School Organisation Code.	1	0.3%
60	Many of the options and arguments presented in consultation were ignored and omitted from reports to council, for example extending the catchment area of Felindre.	The Consultation Report is a summary of the responses raised; however, Cabinet members have sight of all correspondence in full in advance of their meetings so that they can take account of the full detail when making their decisions. Extending the catchment area was specifically considered in the body of the Cabinet Report (option 6).	1	0.3%
61	Council have said that they cannot favour one school over another but they have done so by sacrificing Felindre, a school which multiple generations of some families have been attending. The expansion of Welsh-medium education is of course to be welcomed but council should keep Felindre as	There is plenty of space in the new 21st Century Schools that will be built.	1	0.3%

	well as expanding other schools.			
62	The Wellbeing of Future Generations Act has not been taken into account before starting the process (to build strong communities) and the consultation documents do not meet expectations.	<p>Swansea Council acts in accordance with the Well-being of Future Generations (Wales) in all it does. Sustainable development has been a central organising principle since 2012 and each year the Council aims to further embed and build on sustainable practice. The focus is on integrating behaviour change so that the five ways of working and maximisation of each of the national well-being goals is implicit in how services operate as a whole Council. Integration - Our Corporate Plan 'Delivering a Sustainable and Successful Swansea' sets out how the organisation applies the five ways of working and maximises contribution to each of the national well-being goals. We believe this decision aligns with not only the Well-being Objective 'Improving Education and Skills' but other well-being objectives. Swansea's Local Well-being Plan prioritises Local Well-being Objectives for collective action. The achievement of Local Well-being Objectives are not threatened by this decision.</p> <p>As this body of evidence demonstrates wide ranging impacts across the well-being goals have been documented. Swansea Council considers these issues not only individually by addressing specific concerns in isolation but by considering informally the collective impact on well-being and how issues raised can impact on wider well-being. This indirectly considers the collective impact on the seven well-being goals as a set.</p> <p>Long term - The decision takes account not only of the well-being of learners currently at Felindre but the well-being of all Swansea's learners today and in the future. This includes taking account of long-term trends that inform the development of the Council's policies and strategies.</p>	3	0.8%

		<p>Prevention - The Council has acted having identified adverse impacts on future learning and sustainability. This decision aims to stop or prevent problems getting worse.</p> <p>Collaboration - The consideration of impacts on social, economic, environmental and cultural well-being has been informed both by the expertise of services across our organisation and from external organisations such as the Audit Commission. Collaborative opportunities e.g. federalisation were explored as part</p> <p>Involvement- The consultation document demonstrates considerable involvement activities with those with an interest or who were affected by the proposal in a way that reflects the diversity of the population</p>		
63	Consultation has not taken place with people with an interest e.g. students, parents, residents, local businesses.	Consultation has taken place with all interested parties as per the School Organisation Code.	1	0.3%
64	The consultation did not consider what would happen to children with SEN if the school closed.	All schools must appropriately support their learners with additional learning needs. All pupils, including those with SEN would be appropriately supported by the local authority and the school throughout transition to their new school, including support from Education Psychologists and visits to the new school to meet new classmates and get familiar with the new school building. The required level of intervention would be provided by that new school, and staff training would be provided if required to prepare for individual learners.	1	0.3%
65	The council did not succeed in carrying out a survey on the impact of their decision on the Welsh language within the community, contrary to the 2011 Welsh Language Measure. The school should not close until the Welsh Language Commissioner has investigated a complaint about	This is a living document and develops as the proposal develops. An update was produced at the end of consultation and it was further reviewed at the end of the objection period. The Council has responded to the Commissioner.	208	57.3%

	this process that has been made.			
66	There has not been due regard to UNCRC and lack of engagement with the children in schools likely to be impacted by the arrival of Felindre children. As the council has made a public commitment to children's rights, an impact assessment on their rights should have been undertaken.	As per the Code, consultation meetings have been held with learners on the school councils in YGG Felindre, YGG Tan-y-lan and YGG Tirdeunaw. Consultation papers were also issued to all learners in these schools and beyond. A separate online consultation form was provided for learners and responses were received and noted.	1	0.3%
67	The Community Impact Assessment was inadequate/was not undertaken.	The assessment was produced as per the School Organisation Code requirements.	2	0.6%
68	The local authority could have used the Welsh Government's Small and Rural Schools Grant to fund the school with new IT requirements, which could have allayed concerns about e-learning, which could have facilitated amalgamation.	The grant bids had limited criteria.	1	0.3%
69	The Welsh Language Impact assessment does not address how many families would choose to send their children to a different, English-medium school as a result of the closure.	As there is no closure decision as yet this is not data that we can gather.	1	0.3%
70	The council did not respond to all of the comments from Estyn regarding their consultation. Among the list of failures is the council's inability to carry out a survey on the standard of the current educational provision, despite claiming that the standard of education was the reason for closure. The consultation paper for pupils did not give enough detail on the pros and cons of the status quo.	The local authority has provided a response to points raised by Estyn.	213	58.7%

71	The Council's attitude towards the use and application of Welsh during the consultation process has been inadequate.	Any issues raised about the consultation process were dealt with immediately ensuring that all stakeholders could take a full part in the consultation, as can be seen from these responses. We only had one response to say that a document could not be accessed (although others could access this document).	2	0.6%
72	Felindre is listed as a rural school in the new School Organisation Code. The Cabinet Secretary for Education is trying to protect small rural schools. You did not follow this Code. Whilst the consultation started under the old Code, can you give assurances that the new Code has been considered during this consultation?	The new School Organisation Code had not been published when this proposal commenced, and the Welsh Government confirmed that it would not apply to any proposals that were already out to consultation, as was the case with Felindre. Nevertheless, the council acted within the spirit of the new Code regardless. The new Code requires alternative options to closure to be considered and this took place.	6	1.7%

All consultation responses have been made available in full for Cabinet to view.

3. RhAG RESPONSE

RhAG (Parents for Welsh-medium Education) is an organisation established in 1952 to encourage the development of Welsh-medium education. It is funded by the Welsh Government and represents the parents of pupils in Welsh-medium schools, and is in regular contact with Welsh-medium schools. RhAG is supportive of the proposal to close YGG Felindre and made the following comments during the statutory notice period:

1. We are aware that the number of pupils at Ysgol Gymraeg Felindre has become too small to maintain viable education.
2. We are also aware that the number of pupils living in the catchment area of Ysgol Gymraeg Felindre is very small. This reflects the demographic change in the area, and the mobility of parents in terms of work.
3. There are plans to build a large number of houses near the M4, between Llangyfelach and Felindre. For this reason, and given the County's wider educational service, we would wish to see the County retaining the school at Felindre for the purposes Welsh medium education. This could include:
 - i. Pre-school provision
 - ii. A Pupil Referral Unit
 - iii. A Latecomers' Unit

ii. above might be very appropriate, offering pupils a rural and creative atmosphere, which is likely to differ from their home or urban circumstances.
4. The above schemes might be linked to another Welsh medium school which will serve the area.

The local authority welcomes the support of RhAG to this proposal. There is no plan for the future use of the Felindre school site but, should Cabinet agree to close the school, consideration will be given to alternative uses, subject to demand and other factors, before any disposal takes place.

Equality Impact Assessment (EIA) Report – 2017/8

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

Please refer to the ‘EIA Report Form Guidance’ while completing this form. If you need further support please contact acesstoservices@swansea.gov.uk.

Where do you work?
Service Area: Education
Directorate: People

(a) This EIA is being completed for a:

Service/ Function <input type="checkbox"/>	Policy/ Procedure <input type="checkbox"/>	Project <input type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>	Proposal <input checked="" type="checkbox"/>
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(b) Please name and describe here:

Closure of Ysgol Gynradd Gymraeg (YGG) Felindre with effect from 31 August 2019

The number of full time pupils at YGG Felindre have fallen from 47 in 2016 to 36 in 2017 and was just 20 as at January 2018. This figure had fallen to 14 by September 2018. Most of these pupils are from neighbouring catchment areas rather than local to the school. It is quite clear from the trend in intakes over the last few years that the school is no longer viable. This scale of reduction in pupil numbers inevitably impacts on the school budget share and hence the current staffing structure within the school.

During the last six years, YGG Felindre has had five different headteachers. The most recent senior leaders at the school have been acting headteachers. During the last two years, the local authority has intervened to source and appoint acting headteachers to support the school. Because of the decline in pupil numbers, the school has not advertised for the position of permanent headteacher because of doubt cast on being able to attract candidates but more importantly pupils to sustain the school in the future.

The most recent interim leaders at the school have commented on the future sustainability of the school. Despite best efforts to attract pupils by the most recent headteachers, pupil numbers have remained low and in decline.

Because of the temporary leadership arrangement maintaining and improving pupil standards has slowed down. Monitoring reports indicate the rate of improvement in addressing areas of improvement is satisfactory at best. However, the rate of improvement historically has been good. When the school was inspected in 2012, outcomes were good with excellent features, during the last inspection in 2015, standards were lower, and the school required an intense level of follow-up activity. The most recent evaluation of standards seen in pupils’ work is adequate.

The challenges faced by leaders at Felindre include developing suitable staff to teach a broad range of ages and abilities, a heavy teaching commitment with no deputy headteacher arrangements and mapping a broad and balanced statutory curriculum.

Full consideration has been given to alternatives to closure, including the potential for federation, however, no viable alternative has been identified.

Following a decision by the Council's Cabinet there has been a statutory consultation on a proposal to close YGG Felindre. The consultation was on the basis that, if agreed, the school would close with effect from 31 August 2019. On 20 December 2018 Cabinet decided to publish a Statutory Notice on the proposal to close YGG Felindre. Objections received during this notice period are now being reported back to Cabinet. The current catchment area for YGG Felindre would be transferred to YGG Tirdeunaw as the next nearest school, unless a separate proposal to relocate YGG Tan-y-lan to a new location off Beacons View Road in Clase is approved, in which case it would become the nearest school and would take the pupils from YGG Felindre's catchment area.

Transport would be provided to the new school as per the Council's Home to School Transport Policy.

(c) It was initially screened for relevance to Equality and Diversity on: 15/05//2018

(d) It was found to be relevant to...

- | | | | |
|-----------------------------------|-------------------------------------|--------------------------------------|-------------------------------------|
| Children/young people (0-18)..... | <input checked="" type="checkbox"/> | Sexual orientation..... | <input type="checkbox"/> |
| Older people (50+)..... | <input checked="" type="checkbox"/> | Gender reassignment..... | <input type="checkbox"/> |
| Any other age group | <input checked="" type="checkbox"/> | Welsh language..... | <input checked="" type="checkbox"/> |
| Disability | <input checked="" type="checkbox"/> | Poverty/social exclusion | <input checked="" type="checkbox"/> |
| Race (including refugees)..... | <input checked="" type="checkbox"/> | Carers (including young carers)..... | <input type="checkbox"/> |
| Asylum seekers..... | <input type="checkbox"/> | Community cohesion..... | <input checked="" type="checkbox"/> |
| Gypsies & Travellers..... | <input type="checkbox"/> | Marriage & civil partnership | <input type="checkbox"/> |
| Religion or (non-)belief..... | <input type="checkbox"/> | Pregnancy and maternity..... | <input type="checkbox"/> |
| Sex..... | <input checked="" type="checkbox"/> | | |

(e) Lead Officer

Name: Kelly Small

Job title: Head of Funding and Information Unit

Date: 15/05/2018

(f) Approved by Head of Service

Name: Brian Roles

Date: 15/05/2018

UPDATED FOLLOWING THE CONSULTATION on 29th November 2018
 UPDATED FOLLOWING THE STATUTORY NOTICE PERIOD on 22nd February 2019.

Section 1 – Aims (See guidance):

Briefly describe the aims of the initiative:

What are the aims?

The aim of the proposal is to provide a better quality of education for learners from the Felindre catchment area. The number of full time pupils at YGG Felindre have fallen from 47 in 2016 to 36 in 2017 and was just 20 as at January 2018. This figure had fallen to 14 by September 2018. Most of these pupils are from neighbouring catchment areas rather than local to the school. It is quite clear from the trend in intakes over the last few years that the school is no longer viable. This scale of reduction in pupil numbers inevitably impacts on the school budget share and hence the current staffing structure within the school. Pupils would move to YGG Tan-y-lan and a new school will be built for them in January 2021, providing an environment suitable for learning in the 21st Century.

This recommendation supports the Council's vision that every child has access to high quality teaching that helps them to make the most of their talents. It is also in line with the QEd vision that budgets should be spent on pupils and not wasted on empty spaces.

Who has responsibility?

The overall responsibility would be with Swansea Council.

Who are the stakeholders?

Each stakeholder group requires a specific method of communication to promote key messages during the project. A broad approach for communications methods is outlined below. It draws on corporate methods of communicating to staff in general as well as some established meeting structures within the project.

Audience	Methods
Parents	Letters, media, social media, website
Governors	Face to face briefing, emails
Head and Management Team	Face to face briefing, emails,
Pupils	Face to face school visits, social media
Neighbouring schools' headteachers	Face to face, letter, email, newsletter
Neighbouring schools' governing bodies	Face to face, letter, email, newsletter
Neighbouring schools' parents and learners	Letter, website, parents' evenings, local media, social media
CMT	Face to face briefing, newsletter, email
Cabinet	Face to face briefing, newsletter, email
Group Leaders	Face to face briefing, newsletter, email
Ward Members	Email, phone call
RhAG	Face to face briefing, email
PACA	Face to face briefing, email
Trade Unions	Face to face briefing, email
Evening Post	Face to face briefing, press release
Welsh Government	Letter, local media, email
Estyn	email
AMs/MPs	letter, email
School staff	Face to face, letter, Newsletter, media, social media, website
Swansea Bay Radio, Wave/Swansea Sound, BBC,	Press release

ITV, Western Mail, BBC Cymru, Golwg 360	
Education SLB/EDSLT/DMT	email, newsletter, face to face
O and S Chairs and V Chairs	Email, letter
Catering and cleaning staff	letter, face to face
Community groups	Letter and liaison with Community Regen, social media, website
All Council staff	Staffnet, website, social media
Swansea residents	Media, website, social media
Local businesses	Media, letters, website, social media

Section 2 - Information about Service Users (See guidance):

Please tick which areas you have information on, in terms of service users:

- | | | | |
|-----------------------------------|-------------------------------------|--------------------------------------|-------------------------------------|
| Children/young people (0-18)..... | <input checked="" type="checkbox"/> | Sexual orientation..... | <input type="checkbox"/> |
| Older people (50+)..... | <input checked="" type="checkbox"/> | Gender reassignment..... | <input type="checkbox"/> |
| Any other age group | <input checked="" type="checkbox"/> | Welsh language..... | <input checked="" type="checkbox"/> |
| Disability | <input checked="" type="checkbox"/> | Poverty/social exclusion | <input checked="" type="checkbox"/> |
| Race (including refugees) | <input checked="" type="checkbox"/> | Carers (including young carers)..... | <input type="checkbox"/> |
| Asylum seekers..... | <input type="checkbox"/> | Community cohesion | <input checked="" type="checkbox"/> |
| Gypsies & Travellers..... | <input checked="" type="checkbox"/> | Marriage & civil partnership | <input type="checkbox"/> |
| Religion or (non-)belief..... | <input type="checkbox"/> | Pregnancy and maternity..... | <input type="checkbox"/> |
| Sex..... | <input checked="" type="checkbox"/> | | |

Please provide a snapshot of the information you hold in relation to the protected groups above:

The following information was collated in the annual pupil census held in January 2018:

Number of pupils on roll:

School	N1	N2	R	1	2	3	4	5	6	Total
YGG Felindre	2		1	2	6	3	4	4		22

	2015-2016	2016-2017	2017-2018
Percentage of total pupils on roll living in areas classed in Welsh Index of Multiple Deprivation (WIMD) as being in the most deprived 30% of all areas	17.9%	19.5%	22.7%
Percentage claiming Free School Meals	9.5%	15.2%	26.3%
Percentage with Special Educational Needs (SEN)	27.4%	27.4%	23.2%

In January 2018 the breakdown for SEN was as follows:

Need	School Action	School Action Plus	Statement	Total
<i>Attention Deficit Hyperactivity Disorder</i>	0	0	0	0
<i>Autistic Spectrum Disorders</i>	0	0	0	0
<i>Behavioural, Emotional & Social Difficulties</i>	0	0	0	0
<i>Dyscalculia</i>	0	0	0	0
<i>Dyslexia</i>	0	0	0	0
<i>Dyspraxia</i>	0	0	0	0
<i>General Learning Difficulties</i>	3	0	0	3
<i>Hearing Impairment</i>	0	0	0	0
<i>Moderate Learning Difficulties</i>	0	0	1	1
<i>Multi-Sensory Impairment</i>	0	0	0	0
<i>Physical and Medical Difficulties</i>	0	0	0	0
<i>Profound & Multiple Learning Difficulties</i>	0	0	0	0
<i>Severe Learning Difficulties</i>	0	0	0	0
<i>Speech, Language and Communication Difficulties</i>	0	0	1	1
<i>Visual Impairment</i>	0	0	0	0
Total	3	0	2	5

	Stage A-C	Stage A-D	Stage A-E
Percentage with English	0%	0%	0%

as an Additional Language (EAL)			
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Ethnic Background	Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Non White British	0.0%	0.0%	0.0%	0.0%	0%	0.0%	0%

Staffing

Total teaching staff = 1 full-time equivalent (FTE), made up of 2 part-time females at 15.5 hours and 11.4 hours per week.

1 Part-time female teaching assistant at 27 hours per week

1 Part-time female admin officer at 15 hours per week

1 full-time male acting-headteacher (non-teaching)

We do not hold any other protected characteristic information for the staff.

Any actions required, e.g. to fill information gaps?

- Map community use at YGG Felindre in a community impact assessment.
This is now available here: <https://www.swansea.gov.uk/yggfelindreconsultation>

Section 3 - Impact on Protected Characteristics (See guidance):

Please consider the possible impact on the different protected characteristics.

	Positive	Negative	Neutral	Needs further investigation
Children/young people (0-18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Older people (50+)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other age group	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race (including refugees)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Asylum seekers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gypsies & travellers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Welsh Language	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Poverty/social exclusion	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Community cohesion	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Thinking about your answers above, please explain in detail why this is the case.

(0-18) – YGG Felindre is a Welsh-medium primary school. This proposal looks to close the school and move the pupils to a neighbouring Welsh-medium primary school. Although the change can be seen as negative in the first instance, we believe that the children will receive a similar, if not better, education at the designated neighbouring Welsh-medium primary school.

(Older People 50+/Any other age group) –there is the chance of some redundancies because of this proposal. We would hope for these staff to get work at neighbouring schools; however, this would be a decision for individual governing bodies.

Disability – The design, delivery and implementation of this proposal will take full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. If the proposal were to be approved, and other proposals for new Welsh-medium school buildings were approved this would be hugely beneficial to any learner that has a disability. The modern learning environment would be designed and built whilst taking full consideration of all the needs of current and future learners, staff and the wider community.

Welsh – YGG Felindre is a Welsh-medium primary school and although the proposal is to close a Welsh-medium primary school the proposal is part of the wider Welsh in Education Strategic Plan that is looking to increase the number of places available in Swansea’s Welsh-medium schools. During the consultation it has been raised that the proposal doesn’t take into account Standards 91-93 of Swansea Council’s Compliance Notice under the Welsh Language Measure whereas the proposal could impact on opportunities for persons to use the Welsh language, and that we could be treating the Welsh language no less favourably than the English language.

The Council's wider Welsh in Education Strategic Plan seeks to increase the number of Welsh-medium places in Swansea significantly. As a result of proposals to reach our targets we believe that this would increase opportunities for more people to use the Welsh language and ensure that the Welsh language is treated no less favourably than the English language. The increase in Welsh-medium places will see Swansea playing its part in the Welsh Government's target of having one million Welsh speakers in Wales by 2050.

If the proposal were to go ahead we would expect the Mawr ward to become part of the designated school's community and play an active role in the life of the school. The village hall and local church could still have a large part to play in this.

Poverty/social exclusion – There are low levels of deprivation in this area and therefore the impact on poverty/social exclusion is expected to be low. However, due to the possible changes in catchment areas it is important to consider the impact this could have on learners and their families. The large majority of current pupils at the school live outside of the YGG Felindre catchment area and therefore would likely be living closer to the designated school meaning a shorter distance to travel. Those who live more than 2-miles from the designated school would be offered transport as per the Council's Home to School Transport Policy.

Community Cohesion – It is possible that the proposed closure could have a negative impact on the local community. However, we would expect the designated school to ensure that the community becomes part of the school's community. There is no reason why the local church and village hall can't be used for such partnerships to flourish, and the Council would encourage the designated school to do this.

Section 4 - Engagement:

Please consider all of your engagement activities here, e.g. participation, consultation, involvement, co-productive approaches, etc.

What engagement has been undertaken to support your view? How did you ensure this was accessible to all?

Since announcing the small school review the Council has held a meeting with a working group to look at all options open to the school and its governing body. The council's Cabinet approved the officer recommendation to consult on the closure of the school and a full statutory consultation has taken place to give all stakeholders an opportunity to share their views. These responses were considered by the council's Cabinet on 20 December 2018.

Cabinet decided to proceed to a Statutory notice that provided a further 28 day notice period for objections. Objections were received and these are now being reported back to Cabinet.

The formal consultation processes ran from the 5 September to the 18 October 2018. Survey response forms could be completed on-line, or by hard copy, along with an invitation to respond directly.

Consultation took place as is required in the Welsh Government's School Organisation Code with the specified list of consultees, including:

- pupils, staff, governors and parents at YGG Felindre
- schools and parents affected by the catchment review
- Welsh ministers, AMs and MPs in the area, and local councillors
- Estyn
- Trade unions

Consultation meetings and drop-in sessions were held for the YGG Felindre proposal as follows:

Meeting for:	Venue	Date	Time	Attendance
Learners (School Council)	Felindre School	17/09/18	14:30 – 15:30	11
Staff	Felindre Community Hall	17/09/18	15:30 – 16:15	8
Governors	Felindre Community Hall	17/09/18	16:15 – 17:00	5
Drop-in for parents/public	Felindre Community Hall	17/09/18	11:00 – 13:30	8
Drop-in for parents/public	Felindre Community Hall	17/09/18	17:00 – 19:00	7
Drop-in for parents/public	Felindre Community Hall	01/10/18	14:00 – 16:00	0

A drop-in session was also held for all proposals and the wider catchment review on 2 October 2018 in the Civic Centre and was attended by 9 people.

A joint meeting was held for the school councils of the schools affected by the wider catchment review on 5 October 2018 and was attended by 10 school council members.

The following responses were received for the YGG Felindre proposal:

- 86 responses to an online survey
- 2 responses to an online pupil survey
- 29 written/emailed responses

352 objections were received during the statutory notice period.

What did your engagement activities tell you? What feedback have you received?

There was understandable disappointment at the proposal and concern about the wider impact on the village, whilst understanding the need to review the future sustainability of the school. Of the total responses received, 90 object to the proposal, 6 support and 1 is undecided/unclear. 1 learner response supports the proposal and 1 objects. However, the responses and attendance at drop-in sessions were fairly modest.

The perceived benefits of a small school were highlighted, as well as the current facilities available, and there was concern that some pupils will find it difficult in a large school. However, current numbers are such that the future sustainability of the quality of educational provision has to be reviewed as well as the implications of such mixed age classes. It was suggested that larger schools do not offer the same equality of experience and that there are more opportunities at Felindre, for example all children get to participate, not just a chosen few e.g. sport. However, pupils are likely to have more opportunities in a larger school in new 21st century facilities. There are likely to be more opportunities for sport, particularly team sports, with a larger cohort of pupils.

It was also suggested that the school should be given a chance to improve and that leadership is improving.

The lack of leadership stability at the school was highlighted with a number of acting headteachers being in place over recent years and that there needs to be a period of stability. This has indeed been the case in spite of significant support from the authority. The impact of uncertainty regarding the future of the school was highlighted as contributing to the fall in pupil numbers.

Concerns were raised about moving the children firstly to the current YGG Tan-y-lan site and subsequently to the new school site. It was suggested that any closure should be delayed until the new build for YGG Tan-y-lan was available; however, this would delay the closure until September 2021 and the school would struggle to support the small numbers on roll until that time.

It was also suggested that houses are going to be built in the future in the area at the LDP site at J46 of the M4, so numbers will increase. Future potential housing developments have been considered, however, the timescale and nature of any such developments remain uncertain and the future need for educational provision would be intrinsically linked and outside of the village itself.

Concerns were raised that the school is an integral part of the village which needs children and families and links with the local chapel, although the village is also well served by a community hall. There was also concern about the impact on the Welsh language. However only a very small number of the current pupils are from within the village itself, with most being preferred placements from other parts of Swansea.

As mentioned previously, it has been raised that the proposal doesn't take into account Standards 91-93 of Swansea Council's Compliance Notice under the Welsh Language Measure whereas the proposal could impact on opportunities for persons to use the Welsh language, and that we could be treating the Welsh language no less favourably than the English language.

The Council's wider Welsh in Education Strategic Plan seeks to increase the number of Welsh-medium places in Swansea significantly. As a result of proposals to reach our targets we believe that this would increase opportunities for more people to use the Welsh language and ensure that the Welsh language is treated no less favourably than the English

language. The increase in Welsh-medium places will see Swansea playing its part in the Welsh Government's target of having one million Welsh speakers in Wales by 2050.

As with any statutory proposals, there is a risk of potential legal challenge to the process, however, officers are confident that the process has been appropriately delivered. The 'well-being' goals of the Well-being of Future Generations (Wales) Act 2005 have been considered as well as alternatives to closure, as set out in the consultation document.

Responses highlighted the pressure on Welsh-medium places in other schools and the potential use of YGG Felindre facilities where this is the case. However, other proposals, and indeed the wider Welsh in Education Strategic Plan (WESP) strategy, seek to address the continuing growth in demand for Welsh-medium provision as well as rebalancing the demand and availability of places. A dual stream English/Welsh-medium school was suggested although this would require statutory consultation and a change the Council's current policy.

Concern was expressed at the timing of the proposal in the light of the implications of the new School Organisation Code for small and rural schools. However, the Council has sought to operate within the spirit of the new code throughout the process, even though it had not, at that time, come into force.

Concerns have been raised at the perception that the proposal is financially driven although it has been emphasised throughout that the proposal has been made for educational reasons and the future sustainability of the quality of educational provision with the decline in pupil numbers.

Responses from the learners focused on the following areas:

Wellbeing – some learners mentioned that they were sad at the thought of the school closing and that they were anxious at the thought of a larger school. If the Council were to go ahead with the proposal we would work with YGG Felindre, the designated school and all the learners involved to ensure that the transition is as easy as possible.

Outdoor areas – learners were very happy with their outdoor learning areas. The proposed designs for both possible designated schools will take into account the need for outdoor learning spaces.

Chance for making new and more friends at a larger school – a larger school will indeed give learners to learn with more children of a similar age and also the possibility of a wider circle of friends. The transition plan for any move would look at as many opportunities as possible to aid this process prior to any change.

The only new issue raised during the statutory notice period that requires attention as part of the EIA is around wrap-around provision.

Objectors (2) stated that *breakfast and after school clubs would not be an option for those having home to school transport and therefore is this fair and equitable for all children that will be attending YGG Tan-y-lan?*

If the proposal is approved discussions could take place with parents on the potential of providing the transport earlier for learners to attend breakfast club, should the demand be there.

How have you changed your initiative as a result?

As the numbers of pupils at the school have continued to fall this proposal has not been

changed following the consultation process.

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.):

- Report to Cabinet on the objections received and for a decision to be made on the proposed closure

Section 5 – Other impacts:

Please consider how the initiative might address the following issues - see the specific Section 5 Guidance

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

Please explain any possible impact on each of the above.

Impact on...
Foster good relations between different groups
For the proposal to succeed there would be a focus on fostering relations for learners and parents with the designated school (if approval is given to proceed). This would be vital to ease the transition for all involved.
Advance equality of opportunity between different groups
A larger school can often increase the opportunities available for learners and the community. The proposal would look to build on the good work already taking place to ensure that all learners have opportunities to make the most of their education.
Elimination of discrimination, harassment and victimisation
For the proposal to succeed there would be a focus on building relationships between learners of both schools (if approval is given to proceed). This would be vital to ease the transition for all involved and avoid any discrimination, harassment or victimisation.
Reduction of social exclusion and poverty
There are low levels of deprivation in this area and therefore the impact on poverty/social exclusion is expected to be low. The large majority of current pupils at the school live outside of the YGG Felindre catchment area and therefore would likely be living closer to the designated school meaning a shorter distance to travel. Those who live more than 2-miles from the designated school would be offered transport as per the Council's Home to School Transport Policy. However, we would continually monitor this throughout the process.

What work have you already done to improve any of the above?

Despite best efforts to attract pupils by the most recent headteachers, pupil numbers have remained low and in decline.

Is the initiative likely to impact on Community Cohesion? Please provide details.

If approved, the proposal would remove a school from the Mawr community. Consideration has been given, as part of the consultation to the impact that this could have. The designated school's catchment area would include the current YGG Felindre catchment area and the school would work with the community to ensure that they can play an active role in school life going forward. The majority of the pupils that currently attend the school do not live in the Mawr community.

How does the initiative support Welsh speakers and encourage use of Welsh?

YGG Felindre is a Welsh-medium primary school. Welsh-medium education provides opportunities for children and young people to achieve fluency in the Welsh language through studying a broad range of subjects and disciplines in Welsh. If the proposal is approved these opportunities would be provided at neighbouring Welsh-medium primary schools. As mentioned previously, it has been raised that the proposal doesn't take into account Standards 91-93 of Swansea Council's Compliance Notice under the Welsh Language Measure whereas the proposal could impact on opportunities for persons to use the Welsh language, and that we could be treating the Welsh language no less favourably than the English language.

The Council's wider Welsh in Education Strategic Plan seeks to increase the number of Welsh-medium places in Swansea significantly. As a result of proposals to reach our targets we believe that this would increase opportunities for more people to use the Welsh language and ensure that the Welsh language is treated no less favourably than the English language. The increase in Welsh-medium places will see Swansea playing its part in the Welsh Government's target of having one million Welsh speakers in Wales by 2050.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Section 6 - United Nations Convention on the Rights of the Child (UNCRC):

Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests. Please read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)? If not, please briefly explain your answer here and proceed to Section 7.

The initiative will have a direct impact on children and young people.

All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

The initiative is planned to improve the education offering to learners thus giving them the best opportunity of achieving to their full potential. The proposal relates to the following articles:

Article 3 - All organisations concerned with children should work towards what is best for each child.

Article 12 - Respect for the views of the child

Article 18 - Both parents share responsibility for bringing up their children. We should help parents by providing services to support them.

Article 28 - Children have a right to an education. Discipline in schools should respect children's human dignity.

<p>Article 29 - Education should develop each child’s personality and talents to the full. Article 30 - Children have a right to learn and use the language and customs of their families.</p>
<p>Actions (to mitigate adverse impact or to address identified gaps in knowledge).</p>

Section 7 - Monitoring arrangements:

Please explain the monitoring arrangements for this initiative:

<p>Monitoring arrangements: All projects within the Quality in Education (QEd) Programme have a clear monitoring process in place. Regular progress meetings are held with the school, a formal Project Board is held monthly to discuss key issues and make key decisions, any issues can them be escalated to the Programme Board with the Strategic Programme Board (Corporate) having an overarching view of all Swansea Council projects.</p>
<p>Actions:</p>

Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

- Outcome 1: Continue the initiative – no concern
- Outcome 2: Adjust the initiative – low level of concern
- Outcome 3: Justify the initiative – moderate level of concern
- Outcome 4: Stop and refer the initiative – high level of concern.

For outcome 3, please provide the justification below:
For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

Following the consultation and statutory notice officers continue to believe that this is the correct decision. The number of full time pupils at YGG Felindre have continued to fall from 2016 to the present day with the scale of reduction in pupil numbers inevitably impacting on the school budget share and hence the current staffing structure within the school.

Despite best efforts to attract pupils by the most recent headteachers, pupil numbers have remained low and in decline.

Because of the temporary leadership arrangement maintaining and improving pupil standards has slowed down. Monitoring reports indicate the rate of improvement in addressing areas of improvement is satisfactory at best. The most recent evaluation of standards seen in pupils' work is adequate.

The challenges faced by leaders at Felindre include developing suitable staff to teach a broad range of ages and abilities, a heavy teaching commitment with no deputy headteacher arrangements and mapping a broad and balanced statutory curriculum.

Full consideration has been given to alternatives to closure, including the potential for federation, however, no viable alternative has been identified.

Section 9 - Publication arrangements:

On completion, please follow this 3-step procedure:

- 1. Send this EIA report and action plan to the Access to Services Team for feedback and approval – accesstoservices@swansea.gov.uk**
- 2. Make any necessary amendments/additions.**
- 3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.**

EIA Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Report to Cabinet to decide if a statutory consultation will take place on the closure of YGG Felindre	Head of Service Head of Funding and Information Unit	21 st June 2018	Cabinet approval to consult	Completed
Carry out statutory consultation	Head of Service Head of Funding and Information Unit	18 th October 2018	Consultation completed and findings ready to be reported to Cabinet	Completed
Report findings of the consultation to Cabinet and seek to publish a Statutory Notice	Head of Service Head of Funding and Information Unit	20 th December 2018	Report prepared and decision taken by Cabinet	Completed
Report findings of the Statutory Notice period to Cabinet for a decision to be taken on the proposal.	Head of Service Head of Funding and Information Unit	21 st March 2019	Report prepared and decision taken by Cabinet	
If the proposal is approved, we will ensure that the pupils play an active role in the planning and implementation of the transition process	Project Team and the school	July 2019	Transition plan in place and delivered upon	

* Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).

Equality Impact Assessment (EIA) Report

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

Please refer to the 'EIA Report Form Guidance' while completing this form. If you need further support please contact acesstoservices@swansea.gov.uk.

Where do you work?
Service Area: Education
Directorate: People

(a) This EIA is being completed for a:

Service/ Function <input type="checkbox"/>	Policy/ Procedure <input type="checkbox"/>	Project <input checked="" type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>	Proposal <input checked="" type="checkbox"/>
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(b) Please name and describe here:

Relocation and enhancement of capacity and facilities at YGG Tan-y-lan and necessary catchment area reviews

There are already enough pupils nearest to YGG Tan-y-Lan to support a 1.5 Form Entry (FE) school but the site is struggling to accommodate the current 140 pupils with its current limited capacity. A new, larger site could accommodate at least a 1.5FE school (as included within the 21st Century Schools Band B submission to Welsh Government) and relieve pressures at neighbouring Welsh-medium schools with a catchment review to further re-balance the demand for, and availability of places, and ensure future sustainability.

The recently announced further Welsh Government capital funding to facilitate the earlier delivery of additional Welsh-medium provision could support the delivery of a 2FE new build for the school to further enhance future provision.

An appropriate site capable of accommodating a 2FE school has been identified, relatively close to its existing site and remaining central to the area from which most pupils are currently drawn.

There is potential for short to medium term use of some of the additional capacity and facilities to support child care / wrap around care / adult Welsh classes etc.

(c) It was initially screened for relevance to Equality and Diversity on: 15/05//2018

(d) It was found to be relevant to...

Children/young people (0-18).....	<input checked="" type="checkbox"/>	Sexual orientation.....	<input type="checkbox"/>
Older people (50+).....	<input checked="" type="checkbox"/>	Gender reassignment.....	<input type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	Welsh language.....	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Poverty/social exclusion	<input checked="" type="checkbox"/>
Race (including refugees)	<input checked="" type="checkbox"/>	Carers (including young carers).....	<input type="checkbox"/>
Asylum seekers.....	<input type="checkbox"/>	Community cohesion	<input checked="" type="checkbox"/>
Gypsies & Travellers.....	<input type="checkbox"/>	Marriage & civil partnership	<input type="checkbox"/>
Religion or (non-)belief.....	<input type="checkbox"/>	Pregnancy and maternity.....	<input type="checkbox"/>
Sex.....	<input checked="" type="checkbox"/>		

(e) **Lead Officer**

Name: Claire Lewis

Job title: School Project Business Case
Development Officer

Date: 15/05/2018

(f) **Approved by Head of Service**

Name: Brian Roles

Date: 15/05/2018

UPDATED FOLLOWING THE CONSULTATION on 27th November 2018
UPDATED FOLLOWING THE STATUTORY NOTICE on 25th February 2019

Section 1 – Aims (See guidance):

Briefly describe the aims of the initiative:

What are the aims?

The aim of this proposal is to provide increased Welsh-medium provision for learners to meet increasing demand, in a newly built school that will meet the needs of 21st Century learning.

Raising standards

Our vision is that every child will have access to high quality teaching that helps them to make the most of their talents

Better use of resources

The decision is in line with the QEd vision that budgets should be spent on pupils and not wasted on empty places

Quality of learning environment

Quality learning environments have been shown to lead to improved performance by pupils

Who has responsibility?

Following a statutory consultation process, if approved by the council's Cabinet, the Welsh Government (pending approval of a successful Final Business Case) and Swansea Council would jointly fund the project. The overall responsibility would be with Swansea Council.

Who are the stakeholders?

Each stakeholder group requires a specific method of communication to promote key messages during the project. A broad approach for communications methods is outlined below. It draws on corporate methods of communicating to staff in general as well as some established meeting structures within the project.

Audience	Methods
Parents	Letters, media, social media, website
Governors	Face to face briefing, emails
Head and Management Team	Face to face briefing, emails,
Pupils	Face to face school visits, social media
Neighbouring schools' Heads	Face to face, letter, email, newsletter
Neighbouring schools' parents	Letter, website, parents' evenings, local media, social media
CMT	Face to face briefing, newsletter, email
Cabinet	Face to face briefing, newsletter, email
Group Leaders	Face to face briefing, newsletter, email
Ward Members	Email, phone call
Trade Unions	Face to face briefing, email

Evening Post	Face to face briefing, press release
Welsh Government	Letter, local media, email
Estyn	email
AMs/MPs	letter, email
School staff	Face to face, letter, Newsletter, media, social media, website
Rhieni dros Addysg Gymraeg (RhAG)	Termly meeting, email, website
Partneriaeth Addysg Gymraeg Abertawe (PACA)	Termly meeting, email, website
Swansea Bay Radio, Wave/Swansea Sound, BBC, ITV, Western Mail, BBC Cymru, Golwg 360	Press release
Education SLB/EDSLT/DMT	email, newsletter, face to face
O and S Chairs and V Chairs	Email, letter
Catering and cleaning staff	letter, face to face
Community groups	Letter and liaison with Community Regen, social media, website
All Council staff	Staffnet, website, social media
Swansea residents	Media, website, social media
Local businesses	Media, letters, website, social media

Section 2 - Information about Service Users (See guidance):

Please tick which areas you have information on, in terms of service users:

- | | | | |
|-----------------------------------|-------------------------------------|--------------------------------------|-------------------------------------|
| Children/young people (0-18)..... | <input checked="" type="checkbox"/> | Sexual orientation..... | <input type="checkbox"/> |
| Older people (50+)..... | <input type="checkbox"/> | Gender reassignment..... | <input type="checkbox"/> |
| Any other age group | <input type="checkbox"/> | Welsh language..... | <input checked="" type="checkbox"/> |
| Disability | <input checked="" type="checkbox"/> | Poverty/social exclusion | <input checked="" type="checkbox"/> |
| Race (including refugees)..... | <input checked="" type="checkbox"/> | Carers (including young carers)..... | <input type="checkbox"/> |
| Asylum seekers..... | <input type="checkbox"/> | Community cohesion | <input checked="" type="checkbox"/> |
| Gypsies & Travellers..... | <input checked="" type="checkbox"/> | Marriage & civil partnership | <input type="checkbox"/> |
| Religion or (non-)belief..... | <input type="checkbox"/> | Pregnancy and maternity..... | <input type="checkbox"/> |
| Sex..... | <input checked="" type="checkbox"/> | | |

Please provide a snapshot of the information you hold in relation to the protected groups above.

The following information is collated as part of the annual pupil census that is carried out in January of each year. The below is from the January 2018 PLASC

Number of pupils on roll:

School	N1	N2	R	1	2	3	4	5	6	Total
YGG Tan-y-lan	12	18	25	23	26	25	20	14	7	170

	2015-2016	2016-2017	2017-2018
Percentage of total pupils on roll living in areas classed in Welsh Index of Multiple Deprivation (WIMD) as being in the most deprived 30% of all areas	64.3%	62.2%	61.2%
Percentage claiming Free School Meals	19.5%	16.3%	15.7%
Percentage with Special Educational Needs (SEN)	20.0%	21.8%	17.6%

In January 2018 the breakdown for SEN was as follows:

Need	School Action	School Action Plus	Statement	Total
<i>Attention Deficit Hyperactivity Disorder</i>	0	0	0	0
<i>Autistic Spectrum Disorders</i>	0	0	1	1
<i>Behavioural, Emotional & Social Difficulties</i>	3	2	1	6
<i>Dyscalculia</i>	0	0	0	0
<i>Dyslexia</i>	0	0	0	0
<i>Dyspraxia</i>	0	0	0	0
<i>General Learning Difficulties</i>	7	1	0	8
<i>Hearing Impairment</i>	1	0	0	1
<i>Moderate Learning Difficulties</i>	8	2	0	10
<i>Multi-Sensory Impairment</i>	0	0	0	0
<i>Physical and Medical Difficulties</i>	0	0	0	0
<i>Profound & Multiple Learning Difficulties</i>	0	0	0	0
<i>Severe Learning Difficulties</i>	0	0	0	0
<i>Speech, Language and Communication Difficulties</i>	7	2	0	9
<i>Visual Impairment</i>	1	0	0	1
Total	27	7	2	36

	Stage A-C	Stage A-D	Stage A-E
Percentage with English	0%	0%	1.2%

as an Additional Language (EAL)			
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Ethnic Background	Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Non White British	12.0%	0.0%	3.8%	0.0%	15.0%	0.0%	0.0%

Staffing

Total Teaching staff – 6.2 full-time equivalent (FTE) consisting of 4 full-time females, 2 part-time females for 3 days a week and 1 full-time male

1 male full-time headteacher

1 female full-time admin. officer

8 female teaching assistants (contracts ranging between 27 hours and 32.5 hours per week)

We do not hold any other protected characteristic information for the staff.

Any actions required, e.g. to fill information gaps?

Map use of the school by community groups in the community impact assessment. This is available here: <https://www.swansea.gov.uk/yggtanylanconsultation>.

Impact Assessment – YGG Tan-y-lan

Community Aspect	Current	Impact Assessment
Community Services Provided by the school (e.g. after school clubs, community library etc.)	YGG Tan-y-lan currently run a breakfast club and after school club.	It is envisaged that the breakfast club and after school club provision will continue on the new site.
Facilities Accommodated by the school (e.g. youth club, play group etc.)	YGG Tan-y-lan run the following school clubs, Urdd and Fun Club.	It is envisaged that these clubs will continue on the new site.

Would establishing a multi-school site be considered as a way of retaining buildings?

Establishing a multi-school site would not achieve the objectives of this proposal (see consultation paper). There is very limited use of the school out of school hours. The local authority will work with the school on access to out-of-school hours clubs.

Would alternatives to closure, such as clustering, collaboration or federation with other schools, be considered (taking account of the scope for use of ICT links between school sites)?

These alternatives would not achieve the objectives of the proposal (see consultation paper). There is very limited used of the school out of hours.

Have possibilities of making fuller use of the existing buildings as a community or an educational resource been explored (would it be feasible and economical to co-locate local services within the school to offset the costs of maintaining the school)

These alternatives would not achieve the objectives of the proposal (see consultation paper). There is very limited used of the school out of hours.

What is the overall effect of closure on the local community (including the loss of school based facilities which are used by the local community), particularly in rural areas or those receiving funding as part of regeneration activity?

There is very limited use of the school out of hours. There is no funding from regeneration activity for this school.

Section 3 - Impact on Protected Characteristics (See guidance):

Please consider the possible impact on the different protected characteristics.

	Positive	Negative	Neutral	Needs further investigation
Children/young people (0-18)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Older people (50+)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race (including refugees)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Asylum seekers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gypsies & travellers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Welsh Language	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poverty/social exclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Community cohesion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Thinking about your answers above, please explain in detail why this is the case.

(0-18) – YGG Tan-y-lan is a Welsh-medium primary school. This project will have a very positive impact on the Education of all the children who attend the school in the future. As we are looking to build the school on a new site this should avoid any disruption to those currently attending the school.

(Older People 50+/Any other age group) – The staff, parents, carers and wider school community will benefit greatly from improved facilities to deliver education to all pupils and increase the opportunities for the wider school community to experience and use the Welsh language.

Disability – The design, delivery and implementation of this project will take full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. The design of any new building, the re-modelling and the running of the school in the future will ensure that ALL the pupils and staff can make the most of their improved environment.

Welsh – YGG Tan-y-lan is a Welsh medium primary school and as a result this project will have a positive impact on the Welsh language. The project is part of the wider Welsh in Education Strategic Plan that is looking to increase the number of places available in Swansea's Welsh-medium schools.

Poverty/social exclusion – There are high levels of deprivation in this area and providing the children and the community with this improved facility could give access to courses for adults and access to additional extra-curricular activities. Due to the possible changes in catchment areas it is important to consider the impact this could have on learners and their families. The extra distance to travel to the new site was mentioned by a couple of individuals during the consultation process. Some pupils will inevitably live further away from the new site and this would increase their travel time, however, the sites are only 0.6 miles apart by available walking route and any pupils more than 2 miles away, or where there is no available walking route, would be offered home to school transport.

Community Cohesion – It is possible that the improved facilities will provide increased opportunities for the community to make the most of the school's facilities. However, due to the possible changes in catchment areas it is important to consider the impact this could have on community cohesion as the schools moves (0.6 miles) from one community to another. If the proposal goes ahead the school will work with all communities to ensure that the schools continue with its inclusive ethos that brings communities together for the benefit of all.

Staff - As the proposal is to move all existing staff to the new school there will not be any redundancies as a result of this proposal. Impacts on staff will be minimal as a result of moving staff to a new working environment with improved facilities.

Section 4 - Engagement:

Please consider all of your engagement activities here, e.g. participation, consultation, involvement, co-productive approaches, etc.

What engagement has been undertaken to support your view? How did you ensure this was accessible to all?

Due to the nature of this proposal a full statutory consultation was required. Cabinet approved the proposal to consult and this provided an opportunity for people to share their views and opinions before a final decision is taken. Cabinet subsequently approved publication of a Statutory Notice to provide a further opportunity for any objections to be made. During this period no objections were received and Cabinet are now determining if the project can go ahead. If the project does go ahead, there will be on-going engagement with all stakeholders (as listed) as the project develops and is implemented. This will include meetings, newsletters and online material.

The formal consultation processes ran from the 5 September to the 18 October 2018. Survey response forms could be completed on-line, or by hard copy, along with an invitation to respond directly.

Consultation took place as is required in the Welsh Government's School Organisation Code with the specified list of consultees, including:

- pupils, staff, governors and parents at YGG Tan-y-lan
- schools and parents affected by the catchment review
- Welsh ministers, AMs and MPs in the area, and local councillors
- Estyn
- Trade unions

Consultation meetings and drop-in sessions were held for the YGG Tan-y-lan proposal as follows:

Meeting for:	Venue	Date	Time	Attendance
Learners (School Council)	Tan-y-lan School	27/09/18	14:30 – 15:30	10
Staff	Tan-y-lan School	27/09/18	15:30 – 16:15	28
Governors	Tan-y-lan School	27/09/18	16:15 – 17:00	6
Drop-in for parents/public	Tan-y-lan School	27/09/18	17:00 – 19:00	9

A drop-in session was also held for all proposals and the wider catchment review on 2 October 2018 in the Civic Centre and was attended by 9 people.

A joint meeting was held for the school councils of the schools affected by the wider catchment review on 5 October 2018 and was attended by 10 school council members.

The following responses were received for the YGG Tan-y-lan proposal:

- 30 responses to an online survey
- 23 responses to an online pupil survey
- 3 written/emailed responses

If the proposal was to proceed YGG Tan-y-lan pupils and staff would be asked to complete a questionnaire informing the project what they would like to see in the new school. These would be collated and used by the project team as part of the design workshops with the school.

A school council update would be arranged where the outcomes can be discussed with them and discuss how they can/have been used in the design process. Further updates with

the School Council would continue throughout the project and updated as part of any on-going web updates.

What did your engagement activities tell you? What feedback have you received?

There was broad support for the proposal from those responding, particularly recognising the need for a larger site and facilities. Some specific facilities were suggested and can be considered as part of the detailed design for the new school, which will reflect Building Bulletin guidelines as well as the available funding for the scheme.

Of the total responses received, 29 support the proposal, 2 object and 5 are undecided/unclear. 20 of the learner responses support the proposal, none object and 1 was undecided/unclear.

Concerns have been raised regarding the size of the new build if it cannot be 2 Form Entry (FE) from the outset, which was dependent on access to specific Welsh Government Welsh-medium capital grant. Sadly, our bids have so far been unsuccessful and this opportunity may consequently have been lost. Therefore, the proposal remains for 315 places to serve YGG Tan-y-lan (1.5FE), consistent with the rigorous pupil modelling underpinning the Welsh Government business case, and future proofed for a further 0.5FE in the future as demand continues to grow.

No proposed location to provide a less constrained site will be considered ideal by everyone. Responses have suggested that the Council should be looking to also build a new Welsh-medium school for the Murryston area and possibly consider the use of the current YGG Tan-y-lan site to develop nursery education to feed into any such additional school. This view isn't currently under consideration.

Concerns were raised about traffic around the area of the proposed new site and also the transport arrangements to the new site. If the proposal is approved all routes to the school would be assessed and traffic measures introduced where necessary. Some pupils will inevitably live further away from the new site and this would increase their travel time, however, the sites are only 0.6 miles apart by available walking route and any pupils more than 2 miles away, or where there is no available walking route, would be offered home to school transport.

One response raised concern about perceived larger classes. Class sizes are currently between 25 and 33 and infant classes cannot exceed 30 (unless there are permitted exceptions) and we would not expect junior classes to be any larger in future.

How have you changed your initiative as a result?

The pupils at the school have shared numerous ideas of what they would like to see included in their proposed new school building. These will be considered by the projects team and used to develop the proposed design of the school.

We have been successful in accessing additional Welsh Government funding to build the new school as a 2 Form Entry school..

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.):

- Report back to Cabinet on the statutory notice period
-

Section 5 – Other impacts:

Please consider how the initiative might address the following issues - see the specific Section 5 Guidance

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

Please explain any possible impact on each of the above.

Impact on...
Foster good relations between different groups
A new build school would look to create opportunities for the community to make use of the facilities and provide an increased number of Welsh-medium places.
Advance equality of opportunity between different groups
Access for all pupils/teachers to an improved learning environment. Increased opportunities for community use
Elimination of discrimination, harassment and victimisation
Secure by design – reducing the number of secluded settings within the school site that would allow opportunities for bullying etc.
Reduction of social exclusion and poverty
Modern learning environment encourages attendance and this leads to better outcomes for individual pupils and gives every child/young person a better start in life.

What work have you already done to improve any of the above?

The school already has links with the community and this project will look to further enhance this work.

Is the initiative likely to impact on Community Cohesion? Please provide details.

Yes. The school already has a positive impact on its community. The improvements proposed will provide an opportunity for the school to build on this through greater use of its facilities by the community. However, as mentioned previously, due to the possible changes in catchment areas it is important to consider the impact this could have on community cohesion as the schools moves (0.6 miles) from one community to another. If the proposal goes ahead the school will work with all communities to ensure that the schools continue with its inclusive ethos that brings communities together for the benefit of all.

How does the initiative support Welsh speakers and encourage use of Welsh?

YGG Tan-y-lan is a Welsh-medium primary school. Welsh-medium education provides opportunities for children and young people to achieve fluency in the Welsh language through studying a broad range of subjects and disciplines in Welsh. The proposal to provide a new larger facility on a new site will provide excellent facilities for the school and community as a whole as well as increasing the opportunities for children and the wider community to experience and use the Welsh language.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Section 6 - United Nations Convention on the Rights of the Child (UNCRC):

Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests. Please read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)? If not, please briefly explain your answer here and proceed to Section 7.

The initiative will have a direct impact on children and young people.

All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

The initiative is planned to improve pupils' school environment thus giving them the best opportunity of achieving to their full potential. The proposal relates to the following articles:

Article 3 - All organisations concerned with children should work towards what is best for each child.

Article 12 - Respect for the views of the child

Article 18 - Both parents share responsibility for bringing up their children. We should help parents by providing services to support them.

Article 28 - Children have a right to an education. Discipline in schools should respect children's human dignity.

Article 29 - Education should develop each child's personality and talents to the full.

Article 30 - Children have a right to learn and use the language and customs of their families.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Section 7 - Monitoring arrangements:

Please explain the monitoring arrangements for this initiative:

Monitoring arrangements: All projects within the 21st Century Schools Programme have a clear monitoring process in place. Regular progress meetings are held with the school and the contractors, a formal Project Board is held monthly to discuss key issues and make key decisions, any issues can then be escalated to the Programme Board with the Strategic Programme Board (Corporate) having an overarching view of all Swansea Council projects.

Actions:

Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

- | | |
|---|-------------------------------------|
| Outcome 1: Continue the initiative – no concern | <input checked="" type="checkbox"/> |
| Outcome 2: Adjust the initiative – low level of concern | <input type="checkbox"/> |
| Outcome 3: Justify the initiative – moderate level of concern | <input type="checkbox"/> |
| Outcome 4: Stop and refer the initiative – high level of concern. | <input type="checkbox"/> |

For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

Section 9 - Publication arrangements:

On completion, please follow this 3-step procedure:

1. Send this EIA report and action plan to the Access to Services Team for feedback and approval – accesstoservices@swansea.gov.uk
2. Make any necessary amendments/additions.
3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.

EIA Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Map use of the school by community groups	Project Manager	31 st August 2018	Current use of the school facilities by community groups mapped out	This has been done via the community impact assessment that was published alongside the consultation papers.
Report to Cabinet to decide if a statutory consultation will take place	Head of Service Programme Manager Project Manager	21 st June 2018	Cabinet approval to consult	Cabinet approved the statutory consultation
Statutory consultation – to give all interested parties an opportunity to share their views	Head of Service Programme Manager Project Manager	18 th October 2018	Consultation completed	Report prepared for Cabinet
Report to Cabinet to decide if to go out to Statutory Notice	Head of Service Programme Manager Project Manager	20 th December 2018	Statutory Notice publication approved	Completed
Report to Cabinet following the statutory notice period	Head of Service Programme Manager Project Manager	21 st March 2019	Cabinet approval to proceed with the project	
Provide templates to school council to assist them with the ongoing engagement process with the wider school community	Project Team	December 2020	Increased communication with the wider school community	
As the project continues to develop include more detailed information on accessibility	Project Manager	September 2019	Details on the accessibility of the new build	

*** Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).**

Equality Impact Assessment (EIA) Report

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

Please refer to the ‘EIA Report Form Guidance’ while completing this form. If you need further support please contact acesstoservices@swansea.gov.uk.

Where do you work?
Service Area: Education
Directorate: People

(a) This EIA is being completed for a:

Service/ Function <input type="checkbox"/>	Policy/ Procedure <input type="checkbox"/>	Project <input checked="" type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>	Proposal <input checked="" type="checkbox"/>
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(b) Please name and describe here:

Relocation and enhancement of capacity and facilities at YGG Tirdeunaw and necessary catchment area reviews

There are significant condition and suitability issues at YGG Tirdeunaw. It could be rebuilt on its current site but this would lose the opportunity to relocate the school to an area, currently part of the YG Bryn Tawe site and so benefit from shared use of the wider facilities. The new location would be less than a mile from the current site and more central for the current pupils attending the school.

A 2 Form Entry (FE) new build is included within the 21st Century Schools Band B submission to Welsh Government, which would be ‘future proofed’ to allow future expansion to 2.5FE as required. The recently announced further Welsh Government capital funding to facilitate the earlier delivery of additional Welsh-medium provision could support the delivery of a 2.5FE new build for the school from the outset although this would require a statutory consultation process.

Work is continuing to seek to bring forward the delivery of this new build to, as far as possible mirror the timescale for the new build YGG Tan-y-lan, but this is dependent on the funding model agreed within the detailed business case.

There is potential for short term use of some of the additional capacity and facilities to support child care / wrap around care / adult Welsh classes etc. as well as facilitating the future development of a primary Welsh-medium Specialist Teaching Facility.

The proposal will also impact on the catchment area of YGG Tirdeunaw and a number of other Welsh-medium primary schools and by implication both Welsh-medium secondary schools in Swansea.

(c) It was initially screened for relevance to Equality and Diversity on: 15/05//2018

(d) It was found to be relevant to...

- | | | | |
|-----------------------------------|-------------------------------------|--------------------------------------|-------------------------------------|
| Children/young people (0-18)..... | <input checked="" type="checkbox"/> | Sexual orientation..... | <input type="checkbox"/> |
| Older people (50+)..... | <input checked="" type="checkbox"/> | Gender reassignment..... | <input type="checkbox"/> |
| Any other age group | <input checked="" type="checkbox"/> | Welsh language..... | <input checked="" type="checkbox"/> |
| Disability | <input checked="" type="checkbox"/> | Poverty/social exclusion | <input checked="" type="checkbox"/> |
| Race (including refugees)..... | <input checked="" type="checkbox"/> | Carers (including young carers)..... | <input type="checkbox"/> |
| Asylum seekers..... | <input type="checkbox"/> | Community cohesion | <input checked="" type="checkbox"/> |
| Gypsies & Travellers..... | <input type="checkbox"/> | Marriage & civil partnership | <input type="checkbox"/> |
| Religion or (non-)belief..... | <input type="checkbox"/> | Pregnancy and maternity..... | <input type="checkbox"/> |
| Sex..... | <input checked="" type="checkbox"/> | | |

(e) Lead Officer

Name: Alayne Smith

Job title: School Project Business Case
Development Officer

Date: 15/05/2018

(f) Approved by Head of Service

Name: Brian Roles

Date: 15/05/2018

UPDATED FOLLOWING THE CONSULTATION on 28th November 2018
UPDATED FOLLOWING THE STATUTORY NOTICE on 25th February 2019

Section 1 – Aims (See guidance):

Briefly describe the aims of the initiative:

What are the aims?

The aim of this proposal is to provide increased Welsh-medium provision for learners to meet increasing demand, in a newly built school that will meet the needs of 21st Century learning.

Raising standards

Our vision is that every child will have access to high quality teaching that helps them to make the most of their talents

Better use of resources

The decision is in line with the QEd vision that budgets should be spent on pupils and not wasted on empty places

Quality of learning environment

Quality learning environments have been shown to lead to improved performance by pupils

Who has responsibility?

If approved by the council's Cabinet, the Welsh Government (pending approval of a successful Final Business Case) and Swansea Council would jointly fund the project. The overall responsibility would be with Swansea Council.

Who are the stakeholders?

Each stakeholder group requires a specific method of communication to promote key messages during the project. A broad approach for communications methods is outlined below. It draws on corporate methods of communicating to staff in general as well as some established meeting structures within the project.

Audience	Methods
Parents	Letters, media, social media, website
Governors	Face to face briefing, emails
Head and Management Team	Face to face briefing, emails,
Pupils	Face to face school visits, social media
Neighbouring schools' Heads	Face to face, letter, email, newsletter
Neighbouring schools' parents	Letter, website, parents' evenings, local media, social media
CMT	Face to face briefing, newsletter, email
Cabinet	Face to face briefing, newsletter, email
Group Leaders	Face to face briefing, newsletter, email
Ward Members	Email, phone call
Trade Unions	Face to face briefing, email
Evening Post	Face to face briefing, press release
Welsh Government	Letter, local media, email
Estyn	email
AMs/MPs	letter, email
School staff	Face to face, letter, Newsletter, media, social media, website
Rhieni dros Addysg Gymraeg (RhAG)	Termly meeting, email, website
Partneriaeth Addysg Gymraeg Abertawe (PACA)	Termly meeting, email, website
Swansea Bay Radio, Wave/Swansea Sound, BBC, ITV, Western Mail, BBC Cymru, Golwg 360	Press release
Education SLB/EDSLT/DMT	email, newsletter, face to face
O and S Chairs and V Chairs	Email, letter
Catering and cleaning staff	letter, face to face
Community groups	Letter and liaison with Community Regen, social media, website
All Council staff	Staffnet, website, social media
Swansea residents	Media, website, social media
Local businesses	Media, letters, website, social media

Section 2 - Information about Service Users (See guidance):

Please tick which areas you have information on, in terms of service users:

- | | | | |
|-----------------------------------|-------------------------------------|--------------------------------------|-------------------------------------|
| Children/young people (0-18)..... | <input checked="" type="checkbox"/> | Sexual orientation..... | <input type="checkbox"/> |
| Older people (50+)..... | <input checked="" type="checkbox"/> | Gender reassignment..... | <input type="checkbox"/> |
| Any other age group | <input checked="" type="checkbox"/> | Welsh language..... | <input checked="" type="checkbox"/> |
| Disability | <input checked="" type="checkbox"/> | Poverty/social exclusion | <input checked="" type="checkbox"/> |
| Race (including refugees)..... | <input checked="" type="checkbox"/> | Carers (including young carers)..... | <input type="checkbox"/> |
| Asylum seekers..... | <input type="checkbox"/> | Community cohesion | <input checked="" type="checkbox"/> |
| Gypsies & Travellers..... | <input checked="" type="checkbox"/> | Marriage & civil partnership | <input type="checkbox"/> |
| Religion or (non-)belief..... | <input type="checkbox"/> | Pregnancy and maternity..... | <input type="checkbox"/> |
| Sex..... | <input checked="" type="checkbox"/> | | |

Please provide a snapshot of the information you hold in relation to the protected groups above:

The following information is collated as part of the annual pupil census that is carried out in January of each year. The below is from the January 2018 PLASC:

Number of pupils on roll:

School	N1	N2	R	1	2	3	4	5	6	Total
YGG Tirdeunaw	18	47	54	55	61	53	58	62	53	461

	2015-2016	2016-2017	2017-2018
Percentage of total pupils on roll living in areas classed in Welsh Index of Multiple Deprivation (WIMD) as being in the most deprived 30% of all areas	58.0%	58.7%	60.2%
Percentage claiming Free School Meals	20.7%	16.2%	18.4%
Percentage with Special Educational Needs (SEN)	7.3%	20.3%	19.7%

In January 2018 the breakdown for SEN was as follows:

Need	School Action	School Action Plus	Statement	Total
<i>Attention Deficit Hyperactivity Disorder</i>	0	2	0	2
<i>Autistic Spectrum Disorders</i>	1	1	0	2
<i>Behavioural, Emotional & Social Difficulties</i>	4	3	1	8
<i>Dyscalculia</i>	0	0	0	0
<i>Dyslexia</i>	0	0	0	0
<i>Dyspraxia</i>	0	0	0	0
<i>General Learning Difficulties</i>	38	2	2	42
<i>Hearing Impairment</i>	0	0	0	0
<i>Moderate Learning Difficulties</i>	25	6	0	31
<i>Multi-Sensory Impairment</i>	0	0	0	0
<i>Physical and Medical Difficulties</i>	0	0	1	1
<i>Profound & Multiple Learning Difficulties</i>	0	0	0	0
<i>Severe Learning Difficulties</i>	0	0	0	0
<i>Speech, Language and Communication Difficulties</i>	2	4	1	7
<i>Visual Impairment</i>	0	0	0	0
Total	70	18	5	93

	Stage A-C	Stage A-D	Stage A-E
Percentage with English	0%	0%	0%

as an Additional Language (EAL)			
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Ethnic Background	Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Non White British	1.9%	0.0%	1.6%	0.0%	0.0%	0.0%	3.8%

Staffing

Total Teaching staff = 15 full-time equivalent (FTE), 12 of these are full-time female, 2 are part-time Female (16.5 hours/11hours), 2 are male.

There are 16 teaching assistants (all female) at 14.48 FTE

There are 2 Admin Officers (1 full-time female, 1 part-time female at 12.2 hours per week)

We do not hold any other protected characteristic information for the staff.

Any actions required, e.g. to fill information gaps?

- Map use of the school by community groups in the community impact assessment. This is available here: <https://www.swansea.gov.uk/yggtirdeunawconsultation>.

Impact Assessment – YGG Tirdeunaw

Community Aspect	Current	Impact Assessment
Community Services Provided by the school (e.g. after school clubs, community library etc.)	Breakfast club is provided at the school.	It is envisaged that the breakfast club will continue on the new site.
Facilities Accommodated by the School (e.g. youth club, play group etc.)	YGG Tirdeunaw run the following school clubs for learners, Rugby, Urdd, Choir, Folk Dancing, Art and Sports Club.	It is envisaged that these clubs will continue.

Would establishing a multi-school site be considered as a way of retaining buildings?

Establishing a multi-school site would not achieve the objectives of this proposal (see consultation paper). There is very limited use of the school out of school hours. The local authority will work with the school on access to out-of-school hours clubs.

Would alternatives to closure, such as clustering, collaboration or federation with other schools, be considered (taking account of the scope for use of ICT links between school sites)?

These alternatives would not achieve the objectives of the proposal (see consultation paper). There is very limited use of the school out of hours.

Have possibilities of making fuller use of the existing buildings as a community or an educational resource been explored (would it be feasible and economical to co-locate local services within the school to offset the costs of maintaining the school)?

These alternatives would not achieve the objectives of the proposal (see consultation paper). There is very limited use of the school out of hours.

What is the overall effect of closure on the local community (including the loss of school based facilities which are used by the local community), particularly in rural areas or those receiving funding as part of regeneration activity?

There is very limited used of the school out of hours. There is no funding from regeneration activity for this school.

Section 3 - Impact on Protected Characteristics (See guidance):
Please consider the possible impact on the different protected characteristics.

	Positive	Negative	Neutral	Needs further investigation
Children/young people (0-18)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Older people (50+)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race (including refugees)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Asylum seekers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gypsies & travellers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Welsh Language	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poverty/social exclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Community cohesion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Thinking about your answers above, please explain in detail why this is the case.

(0-18) – YGG Tirdeunaw is a Welsh-medium primary school. This project will have a very positive impact on the education of all the children who attend the school in the future. As we are looking to build the school on a new site this should avoid any disruption to those currently attending the school.

(Older People 50+/Any other age group) – The staff, parents, carers and wider school community will benefit greatly from improved facilities to deliver education to all pupils and increase the opportunities for the wider school community to experience and use the Welsh language .

Disability – The design, delivery and implementation of this project will take full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. The design of any new building, the re-modelling and the running of the school in the future will ensure that ALL the pupils and staff can make the most of their improved environment.

Welsh – YGG Tirdeunaw is a Welsh medium primary school and as a result this project will have a positive impact on the Welsh language. The project is part of the wider Welsh in Education Strategic Plan that is looking to increase the number of places available in Swansea's Welsh-medium schools.

Poverty/social exclusion – There are high levels of deprivation in this area and providing the children and the community with this improved facility could give access to courses for adults and access to additional extra-curricular activities. Due to the possible changes in catchment areas it is important to consider the impact this could have on learners and their families. Some pupils will inevitably live further away from the new site and this would increase their travel time, however, the sites are less than a mile apart by available walking route and any pupils more than 2 miles away or where there is no available walking route would be offered home to school transport.

Community Cohesion – It is possible that the improved facilities will provide increased opportunities for the community to make the most of the school's facilities. Due to the possible changes in catchment areas it is important to consider the impact this could have on community cohesion as the schools moves (less than 1 mile) from one community to another. If the proposal goes ahead the school will work with all communities to ensure that the schools continue with its inclusive ethos that brings communities together for the benefit of all.

Staff - As the proposal is to move all existing staff to the new school there will not be any redundancies as a result of this proposal. Impacts on staff will be minimal as a result of moving staff to a new working environment with improved facilities.

Section 4 - Engagement:

Please consider all of your engagement activities here, e.g. participation, consultation, involvement, co-productive approaches, etc.

What engagement has been undertaken to support your view? How did you ensure this was accessible to all?

As Swansea Council wants to increase the size of the school to 2.5FE a full statutory consultation has now taken place. Following this consultation Cabinet decided to publish a Statutory Notice that would provide a further opportunity for any objections to be made. During this period no objections were received and therefore Cabinet is now being asked to approve the proposal. If the project does go ahead, there will be on-going engagement with all stakeholders (as listed) as the project develops and is implemented. This will include meetings, newsletters and online material.

The formal consultation processes ran from the 5 September to the 18 October 2018. Survey response forms could be completed on-line, or by hard copy, along with an invitation to respond directly.

Consultation took place as is required in the Welsh Government's School Organisation Code with the specified list of consultees, including:

- pupils, staff, governors and parents at YGG Tirdeunaw
- schools and parents affected by the catchment review
- Welsh ministers, AMs and MPs in the area, and local councillors
- Estyn
- Trade unions

Consultation meetings and drop-in sessions were held for the YGG Tirdeunaw proposal as follows:

Meeting for:	Venue	Date	Time	Attendance
Learners (School Council)	Tirdeunaw School	25/09/18	14:30 – 13:30	10
Staff	Tirdeunaw School	25/09/18	13:30 – 16:15	23
Governors	Tirdeunaw School	25/09/18	16:15 – 17:00	0
Drop-in for parents/public	Tirdeunaw School	25/09/18	17:00 – 19:00	2

A drop-in session was also held for all proposals and the wider catchment review on 2 October 2018 in the Civic Centre and was attended by 9 people.

A joint meeting was held for the school councils of the schools affected by the wider catchment review on 5 October 2018 and was attended by 10 school council members.

The following responses were received for the YGG Tirdeunaw proposal:

- 63 responses to an online survey
- 54 responses to an online pupil survey
- 4 written/emailed responses

If the proposal was to proceed YGG Tirdeunaw pupils and staff at the school would be asked to complete a questionnaire informing the project what they would like to see in the new school. These would be collated and used by the project team as part of the design workshops with the school.

A school council update would be arranged where the outcomes could be discussed with them and discuss how they can/have been used in the design process. Further updates with the School Council would continue throughout the project and updated as part of any on-

going web updates.

What did your engagement activities tell you? What feedback have you received?

There was broad support for the proposal from those responding recognising the need for enhanced facilities. The detailed design for the new school will reflect Building Bulletin guidelines as well as the available funding for the scheme.

Of the total responses received, 61 support the proposal, 4 object and 5 are undecided/unclear. 47 of the learner responses support the proposal, none object and 6 were undecided/unclear.

Concerns have been raised regarding the size of the new build if it cannot be 2.5FE from the outset, which was dependent on access to specific Welsh Government Welsh-medium capital grant. Since the end of the consultation period and following further discussions with the Welsh Government we have been now been successful in accessing the grant. This will enable a new build of 2.5FE or 525 places, allowing greater scope to respond to further demand for Welsh-medium provision and so supporting the national targets for Welsh speakers.

No proposed relocation will be considered ideal by everyone and some responses indicated a preference to stay at the current site. As part of the business case process there has been a detailed appraisal of site options which has demonstrated that it would not be feasible or cost effective to rebuild the school on its current site, as well as recognising the benefits of the proposed new location.

Responses have also expressed concern at the impact of the proposed changes to catchment areas. The Cabinet Report of June 2018 sets out clearly the need to rebalance the demand for and availability of Welsh-medium places across the county. The proposed catchment changes, whilst on paper significant, in practice largely formalise the choices already being made by parents and as such should not significantly de-stabilise intake numbers in future years. This is apparent from a comparison of the number and proportion of current pupils from within current catchment areas with the number and proportion after the proposed changes to catchment areas. 68.4% of current YGG Tirdeunaw pupils would be within the proposed new catchment area compared with 47.6% currently. The required capacity of each Welsh-medium primary school has been reviewed in order to, as closely as possible, mirror the number of places required for each pupil to attend their nearest school.

In addition to concerns regarding the size of the proposed school to meet future growth in demand, concerns were raised about the size being perceived to be too large if it were further expanded in the future. However, there are many successful schools in Swansea and Wales of this size and larger. Class teachers will support all learner needs appropriately with the school designed and built to deliver a 21st century education.

Concerns were raised about traffic around the area of the proposed new site and also the transport arrangements to the new site. If the proposal is approved all routes to the school would be assessed and traffic measures introduced where necessary. There would be a separate access to the site for the school and suitable drop-off and pick-up points. Some pupils will inevitably live further away from the new site and this would increase their travel time, however, the sites are less than a mile apart by available walking route and any pupils more than 2 miles away or where there is no available walking route would be offered home to school transport.

A concern was raised about perceived large classes but also recognition of current

pressure on accommodation and facilities which this proposal is seeking to address. Class sizes should not be generally higher than 30 and there is legislation to support this for Foundation Phase classes.

There is some concern about the potential future use of the current school site and also a perception that a future 3-18 school might be a possibility, however, there are no current proposals to establish a 3-18 school, nor for the site.

How have you changed your initiative as a result?

The pupils at the school have shared numerous ideas of what they would like to see included in their proposed new school building. These will be considered by the projects team and used to develop the proposed design of the school.

We have now been successful in accessing additional Welsh Government funding to build the new school as a 2.5 Form Entry school that will provide Tirdeunaw with a modern learning facility.

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.):

- Report to Cabinet following the statutory notice period
- Provide templates to school council to assist them with the ongoing engagement process with the wider school community

Section 5 – Other impacts:

Please consider how the initiative might address the following issues - see the specific Section 5 Guidance

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

Please explain any possible impact on each of the above.

Impact on...
Foster good relations between different groups
A new build school would look to create opportunities for the community to make use of the facilities and provide an increased number of Welsh-medium places
Advance equality of opportunity between different groups
Access for all pupils/teachers to an improved learning environment. Increased opportunities for community use
Elimination of discrimination, harassment and victimisation
Secure by design – reducing the number of secluded settings within the school site that would allow opportunities for bullying etc.
Reduction of social exclusion and poverty
Modern learning environment encourages attendance and this leads to better outcomes for individual pupils and gives every child/young person a better start in life.

What work have you already done to improve any of the above?

The school already has links with the community as is shown in the community impact assessment (<https://www.swansea.gov.uk/yggtirdeunawconsultation>) and this project will

look to further enhance this work.

Is the initiative likely to impact on Community Cohesion? Please provide details.

Yes. The school already has a positive impact on its community. The improvements proposed will provide an opportunity for the school to build on this through greater use of its facilities by the community. However, as mentioned previously, due to the possible changes in catchment areas it is important to consider the impact this could have on community cohesion as the school moves (less than 1 mile) from one community to another but in this case closer to the nucleus of where the majority of pupils are living. If the proposal goes ahead the school will work with all communities to ensure that the schools continue with its inclusive ethos that brings communities together for the benefit of all.

How does the initiative support Welsh speakers and encourage use of Welsh?

YGG Tirdeunaw is a Welsh-medium primary school. Welsh-medium education provides opportunities for children and young people to achieve fluency in the Welsh language through studying a broad range of subjects and disciplines in Welsh. The proposal to provide a new (possibly larger) facility on a new site will provide excellent facilities for the school and community as a whole as well as increasing the opportunities for children and the wider community to experience and use the Welsh language.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

- As the project continues to develop include more detailed information on accessibility

Section 6 - United Nations Convention on the Rights of the Child (UNCRC):

Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests. Please read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)? If not, please briefly explain your answer here and proceed to Section 7.

The initiative will have a direct impact on children and young people.

All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

The initiative is planned to improve pupils' school environment thus giving them the best opportunity of achieving to their full potential. The proposal relates to the following articles:

Article 3 - All organisations concerned with children should work towards what is best for each child.

Article 12 - Respect for the views of the child Page 191

Article 18 - Both parents share responsibility for bringing up their children. We should

help parents by providing services to support them.

Article 28 - Children have a right to an education. Discipline in schools should respect children's human dignity.

Article 29 - Education should develop each child's personality and talents to the full.

Article 30 - Children have a right to learn and use the language and customs of their families.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Section 7 - Monitoring arrangements:

Please explain the monitoring arrangements for this initiative:

Monitoring arrangements: All projects within the 21st Century Schools Programme have a clear monitoring process in place. Regular progress meetings are held with the school and the contractors, a formal Project Board is held monthly to discuss key issues and make key decisions, any issues can then be escalated to the Programme Board with the Strategic Programme Board (Corporate) having an overarching view of all Swansea Council projects.

Actions:

Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern



Outcome 2: Adjust the initiative – low level of concern



Outcome 3: Justify the initiative – moderate level of concern



Outcome 4: Stop and refer the initiative – high level of concern.



For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

Section 9 - Publication arrangements:

On completion, please follow this 3-step procedure:

1. Send this EIA report and action plan to the Access to Services Team for feedback and approval – acesstoservices@swansea.gov.uk
2. Make any necessary amendments/additions.
3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.

EIA Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Map use of the school by community groups	Project Manager	31 st August 2018	Current use of the school facilities by community groups mapped out	This has been done via the community impact assessment that was published alongside the consultation papers.
Report to Cabinet to decide if a statutory consultation will take place on increasing the size of the school to 2.5FE	Head of Service Programme Manager Project Manager	21 st June 2018	Cabinet approval to consult	Decision taken to go out to statutory consultation.
Report to Cabinet for approval to re-locate the school to a new site	Head of Service Programme Manager Project Manager	21 st June 2018	Cabinet approval	
Statutory consultation – to give all interested parties an opportunity to share their views	Head of Service Programme Manager Project Manager	18 th October 2018	Consultation completed	Report prepared for Cabinet
Report to Cabinet to decide if to go out to Statutory Notice	Head of Service Programme Manager Project Manager	20 th December 2018	Statutory Notice publication approved	Completed
Report to Cabinet following the statutory notice period	Head of Service Programme Manager Project Manager	21 st March 2019	Project approved to continue	
Provide templates to school council to assist them with the ongoing engagement process with the wider school community	Project Team	December 2020	Increased communication with the wider school community	
As the project continues to develop include more detailed information on accessibility	Project Manager	September 2019	Details on the accessibility of the new build	

Welsh Language Impact Assessment

CONSULTATION ON THE PROPOSAL TO CLOSE YSGOL GYNRADD GYMRAEG FELINDRE ON 31 AUGUST 2019

1. This Welsh language impact assessment has been carried out in line with the requirements of the Welsh Government's School Organisation Code.
2. Implementing the proposal would result in the school closing with effect from 31 August 2019. The current catchment area for YGG Felindre would be transferred to YGG Tirdeunaw as the next nearest school, unless a separate proposal to relocate YGG Tan-y-lan to a new location off Beacons View Road in Clase is approved, in which case it would become the nearest school and would take the pupils from YGG Felindre's catchment area.
3. Transport would be provided to the new school as per the Council's Home to School Transport Policy.
4. During the last five years education provision at YGG Felindre has been weak. Lack of permanent leadership has been an impediment to school improvement and quality of teaching has been adequate. The local authority has intervened to help to find leaders at the school. The local authority has also intervened to provide considerable support and challenge to ensure necessary improvements were made in the quality of provision and in the wider quality of leadership. The local authority cannot sustain this level of support long term.
5. The proposals for enhanced capacity and facilities at YGG Tan-y-lan and YGG Tirdeunaw would secure strong educational provision in future as well as the benefits of expert permanent leadership at different levels.
6. Consequently, there are several specific reasons why this proposal has been made on educational grounds:
 - i. The new catchment school can offer a wider range of facilities on a less restricted site, offering a greater flexibility in covering all areas of the curriculum and greater access to resources and staffing.
 - ii. Current and future anticipated pupil needs at YGG Felindre can be appropriately met at the new catchment area school.
 - iii. The size of YGG Felindre raises the concern that the quality of educational provision may not be sustainable in the future.
 - iv. The larger team of staff at the new catchment area school can provide a broader range of expertise in areas of the curriculum and in terms of leading whole school initiatives. It can provide staff with more opportunities to develop their skills and can enable the best use to be made of staff expertise.
 - v. A larger school has more flexibility with its budget and can have access to a wider range of resources and staffing.
 - vi. Only 35% of learners on roll at YGG Felindre are from the catchment area.

- vii. Pupil numbers at YGG Felindre have decreased over a number of years and are not projected to increase to a sustainable level.
 - viii. The need to ensure cost effective and equitable distribution of funding amongst schools in Swansea in line with Welsh Government and Audit Commission Guidance.
 - ix. The need for local authorities to consider the closure of those small primary schools that were not justified by local circumstances.
 - x. There has been an inability to attract a headteacher to this small school, leading to a number of short-term interim appointments over the last few years. Sustainable leadership is needed to ensure that standards for learners are maintained.
7. Careful consideration has been given to alternative options to closure, including the potential for Federation. However, at present it is considered that no sustainable alternative option has been identified.
 8. A larger primary school has a larger team of staff that can provide more flexibility in terms of delivering the full curriculum. It can provide staff with more opportunities to develop their skills across the whole primary age range and can enable the best use to be made of staff expertise.
 9. Moving pupils from YGG Felindre to a new catchment school would provide pupils with an education in a larger, more sustainable school with greater curriculum and resource access, as well as allowing enhanced social and sporting opportunities for the learners and preparing them for their move to a larger secondary school.
 10. Both YGG Tan-y-lan and YGG Tirdeunaw have positive standards of achievement and received good Estyn inspections. The schools are well managed and have supportive governing bodies.
 11. A larger school has more flexibility with its budget and can have access to a wider range of resources and staffing. Any efficiencies from having fewer schools in Swansea will be reinvested in the remaining schools for the benefit of all pupils in Swansea.
 12. The very low numbers at YGG Felindre inevitably restrict the range of opportunities for group and interactive work and change the nature of the social education that the school can provide.
 13. The Council would benefit from the removal of a condition category B building, reduced backlog maintenance and improved building efficiency.
 14. The latest Estyn Inspection ratings for the schools affected were:

School	Current Performance Rating	Schools Prospects for Improving
YGG Felindre	Adequate	Adequate
YGG Tirdeunaw	Good	Good
YGG Tan-y-lan	Good	Good

15. There would be no detrimental impact from the proposals on the ability of YGG Tan-y-lan or YGG Tirdeunaw to deliver the full curriculum at the Foundation Phase or at Key Stage 2.
16. The proposal will provide at least as good a quality of educational provision for pupils and would be expected to have a positive impact on educational standards due to:
- Increased number of staff and range of expertise in a larger school environment –reflected in improved planning and schemes of work, quality of provision and monitoring of subjects
 - Greater opportunity for learning with pupils of the same age
 - Improved opportunities for participating in social, cultural and sporting activities
17. During the consultation the following issues were raised in relation to the impact on the Welsh language in the community:

We do not believe that the Council is adhering to its duty under the compliance notice that was published on 30 September 2015 under Section 44 of the Welsh Language (Wales) Measure 2011 in Standard 91, Standard 92 and Standard 93.

Our response to these points are as follows:

Issue	Response
<p>Standard 91:</p> <p>When you publish a consultation document which relates to a policy decision, the document must consider, and seek views on, the effects (whether positive or adverse) that the policy decision under consideration would have on - (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.</p>	<p>The Council's wider Welsh in Education Strategic Plan seeks to increase the number of Welsh-medium places in Swansea significantly. As a result of proposals to reach our targets we believe that this would increase opportunities for more people to use the Welsh language and ensure that the Welsh language is treated no less favourably than the English language.</p> <p>The increase in Welsh-medium places will see Swansea playing its part in the Welsh Government's target of having one million Welsh speakers in Wales by 2050.</p> <p>In the Mawr area of Swansea, if this proposal were to go ahead we believe that as part of a new catchment area the ward would become part of the wider family of the designated school and therefore be able to access further</p>

	opportunities for persons to use the Welsh language.
<p>Standard 92:</p> <p>When you publish a consultation document which relates to a policy decision the document must consider, and seek views on, how the policy under consideration could be formulated or revised so that it would have positive effects, or increased positive effects, on (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.</p>	<p>The Council's wider Welsh in Education Strategic Plan seeks to increase the number of Welsh-medium places in Swansea significantly. As a result of proposals to reach our targets we believe that this would increase opportunities for more people to use the Welsh language and ensure that the Welsh language is treated no less favourably than the English language.</p> <p>The increase in Welsh-medium places will see Swansea playing its part in the Welsh Government's target of having one million Welsh speakers in Wales by 2050.</p> <p>In the Mawr area of Swansea, if this proposal were to go ahead we believe that as part of a new catchment area the ward would become part of the wider family of the designated school and therefore be able to access further opportunities for persons to use the Welsh language.</p>
<p>Standard 93:</p> <p>When you publish a consultation document which relates to a policy decision the document must consider, and seek views on, how the policy under consideration could be formulated or revised so that it would not have adverse effects, or so that it would have decreased adverse effects, on - (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.</p>	<p>The Council's wider Welsh in Education Strategic Plan seeks to increase the number of Welsh-medium places in Swansea significantly. As a result of proposals to reach our targets we believe that this would increase opportunities for more people to use the Welsh language and ensure that the Welsh language is treated no less favourably than the English language.</p> <p>The increase in Welsh-medium places will see Swansea playing its part in the Welsh Government's target of having one million Welsh speakers in Wales by 2050.</p> <p>In the Mawr area of Swansea, if this proposal were to go ahead we believe that as part of a new catchment area the ward would become part of the wider family of the designated school and therefore be able to access further</p>

	opportunities for persons to use the Welsh language.
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18. Against this background and combined with the advantages as listed above we believe that the proposal should result in a positive impact on Welsh language development in Swansea.

19. As such, the Council is satisfied that provision for Welsh language will be improved in Swansea.

Welsh Language Impact Assessment

CONSULTATION ON THE PROPOSAL TO INCREASE THE CAPACITY OF YGG TAN-Y-LAN FROM 1 JANUARY 2021

1. This Welsh language impact assessment has been carried out in line with the requirements of the Welsh Government's School Organisation Code.
2. Implementing the proposal would increase the capacity of YGG Tan-y-lan by building a new school at Beacons View Road, Clase, Swansea. If the proposal goes ahead it will be ready for pupils to attend in January 2021. It should be noted that the Council does not need to consult on moving the school to a new location as it is within a mile of the existing site, but does need to consult on increasing the size of the school.
3. The proposal will also impact on the catchment area of YGG Tan-y-lan and a number of other Welsh-medium primary schools and by implication on both Welsh-medium secondary schools in Swansea.
4. The size of the new school building will depend on the outcome of the Council's 'Increasing Welsh Medium Provision Capital Grant' application to the Welsh Government. If successful, the new school will have a capacity of approximately 420 and an admission number of 60 ie a 2 form entry school. However, if this bid is unsuccessful the Council will build a smaller school with a capacity of 315 and an admission number of 45 ie a 1.5 form of entry school, subject to a successful business case as part of the Welsh Government's 21st Century Schools Programme. Either option would considerably increase the number of places at the school as the school currently has a capacity of 130 and an admission number for September 2019 of 18. If the capacity of a school increases by more than 25% then the Council is required to undertake formal consultation and therefore the new build is subject to the outcome of this consultation process as well as the bids for funding and planning approval.
5. The catchment area of YGG Tan-y-lan, if relocated, will increase to encompass the Clase and Llangyfelach areas that currently feed YGG Tirdeunaw. This will affect other Welsh medium primary schools, providing a better balance of demand for, and availability of Welsh medium places. It will also indirectly affect both of the Welsh medium secondary schools in Swansea through the impact on their existing partner primary schools.
6. Consequently, there are several specific reasons why this proposal has been made on educational grounds:
 - a. YGG Tan-y-lan is currently over capacity and the school is not of sufficient size or suitability to meet the current and future demand for Welsh-medium education in the local area. Projections indicate that there is a need for more Welsh-medium school places across Swansea.

- b. A new and enlarged YGG Tan-y-lan, along with the proposed Welsh-medium catchment changes, would help to address the projected shortfall in Welsh-medium places across the county and particularly address the immediate pressures facing YGG Tan-y-lan, YGG Tirdeunaw and YGG Pontybrenin.
- c. The Council has been working on a wide-ranging school organisation programme, called Quality in Education (QEd), for some time. This proposal has been identified following much discussion with headteachers, governors and other interested parties that have been working with the Council on the QEd programme.
- d. The proposal supports the targets in the Council's approved Welsh Education Strategic Plan and would expand the Welsh language provision in Swansea.
- e. The Welsh Government also requires local authorities to promote the Welsh language, including increasing the number of school places in Welsh-medium schools, and the recently announced this is why they have introduced their Welsh-medium Capital Grant is intended to facilitate the earlier delivery of such measures.
- f. YGG Tan-y-lan is located on a constrained site in Morriston of 0.6 acres with very little outdoor space and no opportunity for expansion to provide suitable provision for learners in accordance with Building Bulletin.

7. The benefits of the relocation and enlargement of YGG Tan-y-lan are:

- a. It will provide a fit for purpose, 21st Century learning environment for existing pupils and staff at YGG Tan-y-lan in line with Building Bulletin guidance and Welsh Government cost and size standards.
- b. It will increase the number of Welsh medium primary places available in the local area.
- c. It will relieve pressures at YGG Tirdeunaw and YGG Pontybrenin, with a catchment review to further re-balance the demand for, and availability of places, and ensure future sustainability.
- d. There are potential opportunities for short to medium-term use of some of the additional capacity and facilities to support Welsh medium child care / wrap-around care / adult Welsh classes etc.
- e. The proposed new location for YGG Tan-y-lan would mean that it would be in close proximity to the M4 and major employers including the DVLA and Morriston Hospital, which are likely to generate considerable demand for Welsh-medium pre-school childcare / day care in this location.

- f. The proposed new site is still within walking distance for the majority of existing pupils.
 - g. The current school site is constrained and cannot support the facilities required to accommodate the demand for places.
 - h. The Council would benefit from the removal of a condition category C building, reduced backlog maintenance and improved building efficiency.
8. The latest Estyn Inspection rating for YGG Tan-y-lan was:

Date of Inspection	October 2015
Current Performance	Good
Prospects for Improvement	Good

9. During the consultation the following issues were raised in relation to the impact on the Welsh language in the community:

The impact survey on the Welsh language does not note the impact of moving Ysgol Tan-y-lan away from the main population centres of Morrison, from Plasmarl to Ynystawe. This would have a negative impact. Whilst moving the school to Clase will attract pupils from another area, this move emphasises the need for a Welsh-medium school in Morrison and this should be mentioned in the document.

Our response to these points are as follows:

Issue	Response
Impact of moving the school from its current community.	<p>The catchment changes linked to the proposal ensures that school will be at the heart of its school community. The school will embrace its wider community and work to ensure that everyone has an opportunity to play an active part in school life.</p> <p>The Council's wider Welsh in Education Strategic Plan seeks to increase the number of Welsh-medium places in Swansea significantly. As a result of proposals to reach our targets we believe that this would increase opportunities for more people to use the Welsh language and ensure that the Welsh language is treated no less favourably than the English language.</p> <p>The increase in Welsh-medium places will see Swansea playing its part in the Welsh Government's target of having</p>

	<p>one million Welsh speakers in Wales by 2050.</p> <p>We will continue to monitor the demand for Welsh-medium education and plan accordingly to meet future demand and future targets.</p>
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10. Against this background and combined with the advantages as listed above we believe that the proposal should result in a positive impact on Welsh language development in Swansea.

11. As such, the Council is satisfied that provision for Welsh language will be improved in Swansea.

Welsh Language Impact Assessment

CONSULTATION ON THE PROPOSAL TO INCREASE THE CAPACITY OF YGG TIRDEUNAW FROM 1 JANUARY 2021

1. This Welsh language impact assessment has been carried out in line with the requirements of the Welsh Government's School Organisation Code.
2. Implementing the proposal would increase the capacity of YGG Tirdeunaw by building a new school on land currently part of the YGG Bryn Tawe site, Heol Gwrysydd, Penlan. If the proposal goes ahead it will be ready for pupils to attend in January 2021. It will also mean that the Flying Start will move to the new building at the same time. Note that the Council does not need to consult on moving the school to a new location as it is within a mile of the existing site but does need to consult on increasing the size of the school.
3. The proposal will also impact on the catchment area of YGG Tirdeunaw and a number of other Welsh-medium primary schools and by implication both Welsh-medium secondary schools in Swansea.
4. The size of the new school building will depend on the outcome of the Council's Welsh-medium Capital Grant bid to the Welsh Government. If successful, the new school will have a capacity of approximately 525 and an Admission Number of 75 i.e. a 2.5 form entry school. However, if this bid is unsuccessful the Council will build the school with a capacity of approximately 420 and an Admission Number of 60 i.e. a 2 form entry school, subject to a successful business case as part of the Welsh Government's 21st Century Schools Programme. The first, preferred option would increase the number of places at the school, as the school currently has a capacity of 413 and an Admission Number for September 2019 of 59. If the capacity of a school increases by more than 25% then the Council is required to undertake formal consultation and therefore the proposed new build with a capacity of 525 is subject to the outcome of this consultation process as well as the bids for funding and planning approval
5. The catchment area of YGG Tirdeunaw, if relocated and expanded, would increase to encompass Blaenymaes, Cadle, Clwyd, Gendros, and Portmead catchment areas currently feeding YGG Pontybrenin and would also include Brynhyfryd and Burlais catchment areas currently feeding YGG Bryn-y-mor. Clase and Llangyfelach areas would no longer feed YGG Tirdeunaw but would feed YGG Tan-y-lan instead, with a separate proposal underway to rebuild that school in the Clase area. The impact on other Welsh-medium primary schools will provide a better balance of demand and availability for places. It will also indirectly affect both of the Welsh-medium secondary school in Swansea through the impact on their existing partner primary schools.
6. The proposed catchment changes to a large extent formalise the choices already being made by parents and as such should not significantly destabilise intake numbers in future years. This is apparent from a

comparison of the number and proportion of current pupils from within current catchment areas with the number and proportion after the proposed changes to catchment areas, as well as the specific pupil distribution maps for each school, which are available. As at January 2018 47.6% of pupils came from within the current catchment area compared with 68.4% within the proposed catchment area.

7. The catchment proposals seek to maintain a careful balance between the changes and refinements that are necessary to better reflect the demand for and availability of places, and the desire to minimise unnecessary uncertainty and change for parents and schools. All existing pupils can be reassured that any changes will not affect them since changes will be phased in for new pupils. Similarly, the local authority will recognise the need to support families for siblings to attend the same school where this is requested by parents. This obligation will last until August 2021 (on assumption of a construction completion date in January 2021) as the local authority will seek to admit younger siblings transferring to the original catchment school up to the end of Year 6 for primary aged siblings and up to Year 11 (that is to the end of statutory school age) for secondary aged siblings.
8. Consequently, there are several specific reasons why this proposal has been made on educational grounds:
 - a. YGG Tirdeunaw is nearly full to capacity and the school is not of sufficient size or suitability to meet the current and future demand for Welsh-medium education in the local area. Pupil projections indicate that there is a need for more Welsh-medium school places across Swansea.
 - b. A new and enlarged YGG Tirdeunaw, along with the proposed Welsh-medium catchment changes, would help address the projected shortfall in Welsh-medium places across the county and particularly the immediate pressures facing YGG Tirdeunaw, YGG Tan-y-lan and YGG Pontybreinin.
 - c. The Council has been working on a wide-ranging school organisation programme, called Quality in Education (QEd), for some time. This proposal has been identified following much discussion with headteachers, governors and other interested parties that have been working with the Council on the QEd programme.
 - d. The proposal supports the targets in the Council's approved Welsh Education Strategic Plan and would expand the Welsh language provision in Swansea
 - e. The Welsh Government also requires local authorities to promote the Welsh language, including increasing the number of places in Welsh-medium schools, and the recently announced 'Increasing Welsh-medium Provision Capital Grant' is intended to facilitate the earlier delivery of such measures.

f. The school is within what was originally part of the Daniel James Community School buildings which were not designed for primary school provision and any remodel or refurbishment of the existing buildings would not be able to conform to the Building Bulletin. The mechanical and electrical provision at the site is also interconnected and so the buildings are not operating efficiently, and any attempt to remodel and refurbish the existing school premises would be expensive and complex.

9. The benefits of the relocation and enlargement of YGG Tirdeunaw are:

- a. It will provide a fit for purpose, 21st Century learning environment for existing pupils and staff at YGG Tirdeunaw in line with Building Bulletin guidance and Welsh Government cost and size standards.
- b. It will provide opportunities for improved transition for pupils to YGG Bryn Tawe.
- c. It will provide opportunities for the shared use of resources between YGG Tirdeunaw and YGG Bryn Tawe.
- d. It will provide opportunities to link with the Penlan Leisure Centre, including benefiting from those facilities.
- e. It will increase the number of Welsh-medium primary places available in the local area.
- f. It will relieve pressures at YGG Pontybrenin with a catchment review to further re-balance the demand for, and availability of places, and ensure future sustainability.
- g. There are potential opportunities for short to medium-term use of some of the additional capacity and facilities to support Welsh-medium child care/wrap-around care/adult Welsh classes etc.
- h. The proposed new site is still within walking distance for the majority of existing pupils and at the heart of the existing catchment area, as apparent from pupil distribution maps.
- i. The council would benefit from the removal of a condition category C building, reduced backlog maintenance and improved building efficiency.

10. The latest Estyn Inspection rating for YGG Tirdeunaw was:

Date of Inspection	March 2015
Current Performance	Good
Prospects for Improvement	Good

11. During the consultation the following issues were raised in relation to the impact on the Welsh language in the community:

The consultation in the Study of Impact on the Welsh language does not mention the linguistic effect of moving the school from the current community, except for mentioning the number of pupils. Due consideration is needed of the impact on the Treboeth community, and the linguistic and cultural connections.

12. Our response to these issues are as follows:

Issue	Response
Impact of moving the school from its current community.	<p>The catchment changes linked to the proposal ensures that school will be at the heart of its school community. The school will embrace its wider community and work to ensure that everyone has an opportunity to play an active part in school life.</p> <p>The Council's wider Welsh in Education Strategic Plan seeks to increase the number of Welsh-medium places in Swansea significantly. As a result of proposals to reach our targets we believe that this would increase opportunities for more people to use the Welsh language and ensure that the Welsh language is treated no less favourably than the English language.</p> <p>The increase in Welsh-medium places will see Swansea playing its part in the Welsh Government's target of having one million Welsh speakers in Wales by 2050.</p> <p>We will continue to monitor the demand for Welsh-medium education and plan accordingly to meet future demand and future targets.</p>

13. Against this background and combined with the advantages as listed above we believe that the proposal should result in a positive impact on Welsh language development in Swansea.

14. As such, the Council is satisfied that provision for Welsh language will be improved in Swansea.



RhAG Abertawe

Response to City and County of Swansea Council's proposal

To close Felindre Welsh medium primary school

Contact:

Heini Gruffudd (Chair)

RhAG Abertawe

Hafan, 2 Lôn Rhianfa, Abertawe SA1 6DJ

heini@gruffudd.org

2nd February, 2019

PARENTS FOR WELSH MEDIUM EDUCATION

Parents for Welsh Medium Education is an organisation established in 1952 to encourage the development of Welsh medium education.

It is funded by the Welsh Government.

The organisation represents the parents of pupils in Welsh medium schools, and is in regular contact with Welsh medium schools.

General

1. RhAG has consistently argued that there is a need to increase the number and percentage of Swansea pupils in Welsh medium education.
2. The objectives of RhAG have been accepted by the Welsh Government, which aims to have a million Welsh speakers by 2050.
3. We share the Welsh Government's vision that local councils need to create demand for Welsh medium education, rather than merely responding to demand.
4. The comments below reflect our comments to the initial consultation.

Ysgol Gymraeg Felindre

1. We are aware that the number of pupils at Ysgol Gymraeg Felindre has become too small to maintain viable education.
2. We are also aware that the number of pupils living in the catchment area of Ysgol Gymraeg Felindre is very small. This reflects the demographic change in the area, and the mobility of parents in terms of work.
3. There are plans to build a large number of houses near the M4, between Llangyfelach and Felindre. For this reason, and given the County's wider educational service, we would wish to see the County retaining the school at Felindre for the purposes Welsh medium education. This could include:
 - i. Pre-school provision
 - ii. A Pupil Referral Unit
 - iii. A Latecomers' Unit

ii. above might be very appropriate, offering pupils a rural and creative atmosphere, which is likely to differ from their home or urban circumstances.
4. The above schemes might be linked to another Welsh medium school which will serve the area.



RhAG Abertawe

Response to City and County of Swansea Council's proposal

To increase the size of Tan-y-lan Welsh medium primary school From January 2021

Contact:

Heini Gruffudd (Chair)

RhAG Abertawe

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2nd February 2019

PARENTS FOR WELSH MEDIUM EDUCATION

Parents for Welsh Medium Education is a movement established in 1952 to encourage the development of Welsh medium education.

It is funded by the Welsh government.

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General

1. RhAG has consistently argued that there is a need to increase the number and percentage of Swansea pupils in Welsh medium education.
2. The objectives of RhAG have been accepted by the Welsh Government, which aims to have a million Welsh speakers by 2050.
3. We share the Welsh Government's vision that local councils need to create demand for Welsh medium education, rather than merely responding to demand.
4. The comments below reflect our comments to the initial consultation.

The Catchment Area of Ysgol Tan-y-Lan

1. We welcome that the new building of Ysgol Tan-y-lan will have significant land for growth. The school has suffered since its inception. When it was established as a 0.5 school, we argued that a 1.0 or 1.5 school was needed in Morriston and our arguments have been borne out.
2. We are concerned, however, that moving the school to Clase means that the school is a long way from large parts of the Morriston Ward. We want to see a Welsh medium school serving the main populated areas of Morriston.
3. The Welsh language impact survey does not identify the impact of the withdrawal of Ysgol Tan-y-lan away from the main centres of the population of Morriston, from Plasmarl to Ynystawe. This will have a negative impact. While moving the school to Clase draws pupils from other areas, the move emphasises the need for a Welsh medium school for Morriston, and there should be an acknowledgement of this in the document, with a suggestion of future possibilities.
4. In light of this, we wish to propose that the Tan-y-lan building be reserved for Welsh medium education, possibly as a nursery/reception class location or for a pupil referral unit, or for latecomers to Welsh medium education, or for another purpose related to the Welsh language. Following on from this we want to see the establishment of an additional Welsh medium school in Morriston, possibly on land between Morriston Cross and Ynysforgan.
5. We look forward to the establishment of Ysgol Tan-y-lan in Clase, in a new, purpose-built building which will be adequate for a growth in Welsh medium education.



RhAG Abertawe

Response to City and County of Swansea Council's proposal

To increase the size of Tirdeunaw Welsh medium primary school from January 2021

Contact:

Heini Gruffudd (Chair)

RhAG Abertawe

Hafan, 2 Lôn Rhianfa, Abertawe SA1 6DJ

heini@gruffudd.org

2nd February 2019

PARENTS FOR WELSH MEDIUM EDUCATION

Parents for Welsh Medium Education is an organisation established in 1952 to encourage the development of Welsh medium education.

It is funded by the Welsh Government.

The organisation represents the parents of pupils in Welsh-medium schools, and is in regular contact with Welsh medium schools.

General

1. RhAG has consistently argued that there is a need to increase the number and percentage of Swansea pupils in Welsh medium education.
2. The objectives of RhAG have been accepted by the Welsh Government, which aims to have a million Welsh speakers by 2050.
3. We share the Welsh government's vision that local councils need to create demand for Welsh medium education, rather than merely responding to demand.
4. The comments below reflect our comments to the initial consultation.

Ysgol Tirdeunaw Catchment Area

1. We have been concerned that Ysgol Tirdeunaw is being relocated. Ysgol Tirdeunaw has established itself in the area, and has become an exceptionally successful school, delivering Welsh medium education in a relatively deprived area. Our first option would be to see the school being rebuilt on its own site.
2. By moving the building to Heol Gwyrosydd, we welcome the opportunity to have new buildings with the best facilities.
3. We also welcome the establishment of a Welsh medium school nearer to the Manselton /Cwmbwrla / Blaenymaes areas, which have been deprived of a convenient Welsh medium education since Ysgol Gymraeg Cwmbwrla was moved to Brynymôr in 1976.
4. It is possible that the percentages of pupils from the Penlan area will increase, with the new areas that will fall within the Tirdeunaw catchment area.
5. Similarly, it is possible that there will be some loss from the Mynydd-bach and Treboeth areas.
6. Although there is mention here of changing catchment areas, with Ysgol Gymraeg Pontybrenin transferring Blaenymaes, Cadle, Clwyd Gendros and Portmead to Ysgol Tirdeunaw, there is no suggestion here of how the severe overcrowding at Ysgol Pont-y-brenin is to be addressed in earnest. There is an urgent need for an additional Welsh medium primary school between Gorseinon – Garden Village and Penllergaer. It would be good to have a complete explanation of the County's intentions for these areas.
7. We welcome the likelihood of the County receiving additional funding from the Government to ensure that the Tirdeunaw building is of the biggest planned size.
8. We look forward to seeing Ysgol Tirdeunaw receive a new purpose built and adequate building on the site of Bryn Tawe, at Heol Gwyrosydd.

Support for Felindre 2014-2018

The school has benefitted from additional financial support during the last four academic years. In addition to supporting temporary headteachers at the school, Felindre has received a school improvement package of support that is worth at least £10k above the amount effective schools would receive. Overall, the school has received approximately **£50k** worth of additional support during the last four years to prevent the situation getting any worse.

Background

- Prior to September 2014 the headteacher successfully applies for a headship at a larger school.
- September 2014: Headteacher and Deputy Headteacher started in post, although the headteacher had already been acting head during the previous academic year. There had been a great deal of change in the school's staffing situation over the last few years.
- October 2014: Autumn Core Visit - School National Categorisation Amber – in order to provide support for new head.
- February 2015: School judged as Adequate, Adequate during Estyn inspection. At the time there were 57 pupils aged between 3 and 11 years on roll, including 6 part-time nursery pupils arranged into three mixed-age classes.
- March 2015 - Challenge adviser (CA) and headteacher worked together on the Post Inspection Action plan (PIAP)
- April 2015 – During the summer and autumn terms CA worked very closely with headteacher to implement and review the PIAP regularly. This was an ongoing process until the revisit by Estyn in May 2016
- April 2015- Full Governing Body (GB) meeting attended by CA to discuss way forward after Estyn inspection and details to be included in PIAP
- October 2015 – Autumn Core Visit. Categorisation Amber to allow continued support during period of Estyn monitoring.
- May 2016 – The school successfully came out of Estyn monitoring, having made good progress in most of the recommendations.
- September 2016- Headteacher successful in her application for headship at a larger school. It was decided that the deputy head would act up as head for a period of time until a new headteacher was appointed.
- October 2016- Autumn Core Visit – categorisation Amber, due to the continued need for support as unknown details of future leadership at school.
- Autumn Term 2016 - The deputy headteacher was successful in gaining employment at a larger school. This would mean that he would only be available for the first half of the spring term. This meant that the school would lose 50% of its teaching staff. This was deemed by many parents to be too much change in too short a space of time. Leadership changes were out of the control of the local authority.
- October 2016 – January 2017 – Due to the imminent departure of the headteacher, following their successful application for a post at a larger school, the chair of governors and CA met on numerous occasions to discuss

different strategies with the Chief Education Officer. The Chief Education Officer at the time tried unsuccessfully to second a person to fill the post. Initially we approached a neighbouring school to offer the secondment to either the deputy head or the assistant head, both of whom had NPQH (the qualification required for headship), but the offer was refused. However the head at another school agreed to carry out the responsibility on a part-time basis for three days a week from 1 January 2017.

- January 2017 to March 2017 – the local authority provided £7,787 to fund the experienced head. The supportive role with the CA was reduced slightly, although there was continued regular visits to the school and opportunities for updates regarding the current situation at the school. During her time at the school the acting headteacher noted concerns regarding the way that the GB was being run. It was decided to broker support for the GB from the appropriate agencies at the local authority. The Primary Support Officer began attending the finance sub-committee for the first time.
- February 2017 – the CA met with appointments panel to advertise for new head. 2 applications received and during shortlisting meeting it was felt that the post needed to be re-advertised as neither applicant were deemed suitable. The deputy head also left post during the half term.
- September 2017 – an assistant headteacher at a neighbouring was seconded to the school to very closely with the part-time headteacher from another school who was employed in a supportive role. £30K cost to the LA. Bespoke training took place from members of the School and Governor Unit who attended the Governing Body meeting to work with them.
- The local authority brokered support with an excellent school in Carmarthenshire to improve Foundation Phase provision. This was set up in conjunction with the regional school improvement service, as monitoring showed that this provision was not effective within the school. The school had taken on board many strategies and these were put in place across the school. There had also been a change in teaching staff in the Foundation Phase which had been very positive.
- March/April 2018 - The acting head was also successful in a headship application at a larger school and started his post in the summer term 2018. A deputy headteacher was then seconded from another authority to take up the role of acting headteacher to allow the other acting headteacher to take up his new post and to maintain leadership standards at the school.
- May 2018 – There were only 14 pupils at YGG Felindre, all housed in one of the buildings.
- June 2018 – Report to Cabinet seeking approval to commence statutory consultation on potential closure

The CA has worked very closely with each headteacher and with the GB during this period of uncertainty. We have sought to find a resolution to the problems at Felindre at each step of the way. The LA has been very supportive of the school at all times. However, the issue of numbers has always posed a challenge. The GB has also seen 3 chairs of governors and there has also been a significant change in the members of the GB during this time.



Report of the Cabinet Member for Education Improvement, Learning and Skills

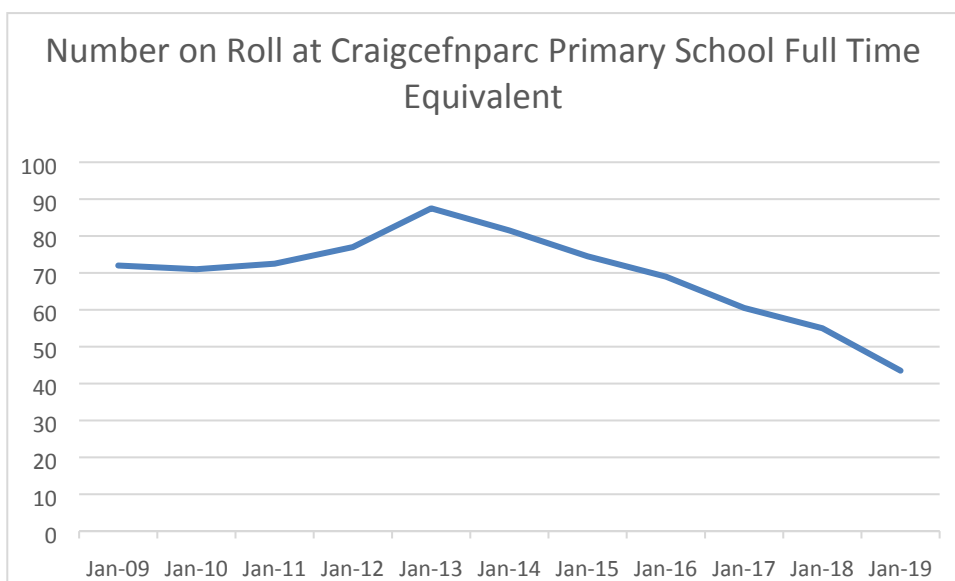
Cabinet – 21 March 2019

Small School Review – Proposal to Close Craigcefnparc Primary School

Purpose:	To consider objections received during the Statutory Notice period and to seek determination on the proposal to close Craigcefnparc Primary School with effect from 31 August 2019.
Policy Framework:	QEd Programme Corporate Plan 2018/22
Consultation:	Access to Services, Finance, Legal.
Recommendation(s):	<ol style="list-style-type: none">1) Cabinet consider the draft objection report (draft at Appendix A)2) Cabinet approve the proposal to close Craigcefnparc Primary School with effect from 31 August 20193) Cabinet approve the publication of the Objection Report
Report Author:	Kelly Small
Finance Officer:	Ben Smith
Legal Officer:	Tracey Meredith
Access to Services Officer:	Rhian Millar

1. Small School Review

- 1.1 Cabinet agreed at their meeting on 21 June 2018 that consultation should take place on the proposed closure of Craigcefnparc Primary School. This reflected the need to provide sustainable quality education for learners, falling pupil numbers and additional demands of the emerging new curriculum on schools.
- 1.2 The number of pupils on roll at Craigcefnparc Primary School has been reducing as follows:



1.3 During the last five years, the overall quality of education and capacity to improve at Craigcefnparc Primary School is poor in comparison to neighbouring schools. Challenge Advisers from regional consortia evaluate the school’s capacity to improve, taking account of evidence about the standards achieved and the quality of leadership and learning and teaching, judged against a national categorisation model. Schools are placed in one of four groups, A to D. Schools where the judgement is an A show the greatest capacity to improve along with the ability to support other schools. Those where the judgement is D need the most support.

Self-improvement capacity rating (A – D)						Total Support Days
School	2014	2015	2016	2017	2018	
Clydach	B	B	B	B	B	50 days
Craigcefnparc	C	D	C	B	C	80 days**
Craigfelen	A	B	B	A	A	32 days
Glais	B	A	A	A	A	26 days
Gellionnen	B	B	C	B	B	55 days
St. Joseph’s	B	B	B	B	B	50 days
Cwmrhydyceirw	A	A	A	A	A	20 days

1.4 The local authority has always been careful to ensure that the school gets their entitled support and has worked with governors and leaders to this over the years. The support a school receives comes in a variety of formats, including Challenge Adviser support days, subject support days, local authority officer advice and guidance, and support brokered by the Challenge Adviser from other schools. A summary of the support provided to Craigcefnparc Primary School in the years leading up to the proposal to consult on closure is attached at Appendix C. Note that the FOI from objectors only sought part of the picture of the support provided to the school. The full picture of the comparative entitlement to support days, linked to capacity to self-improve, is shown in the table above. It should

be noted that the governing body has not always been receptive to their entitlement of support.

- 1.5 The school was inspected and went into an informal category of Estyn follow-up called “Estyn Monitoring”. At that time, the school had an acting headteacher and considerable support was provided before, during and after the inspection to help the school plan for improvements. A school in Estyn Monitoring is not a strong school and the effort of the acting headteacher to work with the local authority was substantial. Although the school came out of Estyn Monitoring, annual monitoring by the local authority using nationally agreed criteria indicates, in agreement with the current acting headteacher, that the correct support package is currently in place. No governor attended the Autumn 2018 categorisation meeting and no formal objection was received as per the national disagreement pathway.
- 1.6 Although sound progress has been made in addressing specific recommendations in relation to teaching and learning, the school has insufficient capacity to improve itself because of inconsistent leadership. Due to budget constraints, the only option available to the school has been to act-up their deputy headteacher to cover the headship for three days a week, making her the only headteacher in Swansea to have a teaching commitment. The budget position will not improve and therefore this is likely to be the long-term leadership position at the school.
- 1.7 As demonstrated above, the school has been a cause for concern to the school improvement service for some time and proportionate support has been provided. Despite best efforts to sustain improvements, the school does not demonstrate enough self-improvement over a sustained period of time and in line with nationally agreed criteria for capacity to improve. The option of transferring children to be educated at Clydach Primary School helps meets pupils' entitlement to the best education possible.
- 1.8 Alternatives to the closure of Craigcefnparc Primary School had been considered by officers at internal meetings prior to consultation, including Federation (where Craigcefnparc and another school could continue to exist but under one new governing body with the option to share resources and some of their staffing). Meetings were also held with Craigcefnparc governors as follows:
 - 5 March 2018 – the Chief Education Officer (CEO) and other local authority officers met with the acting headteacher of Craigcefnparc and vice-chair of the governing body to discuss budget concerns, particularly the apparent inability of the governing body to set a balanced budget for the financial year 2018/19. The school budget is inevitably impacted by falling pupil numbers as the vast majority of funding must follows pupils. At this meeting it was agreed to provide an additional £15k to support administration at the school (on top of additional support through the school improvement service) – a figure that was subsequently increased to £25k. However, the school were unwilling to implement a new staffing

structure which would have resulted in the loss of a full-time teacher. The governors were willing to work with the local authority and recognised that federation or closure must be options. The CEO advised that federation proposals would usually come from governing bodies with support from the local authority.

- 16 March 2018 – the CEO and Head of School Support Unit (HSSU) met with the governing body and discussed the falling pupil numbers at the school, the educational and financial challenges which this presents, and the need to review the future sustainability of the school. Alternatives were also discussed, particularly federation as well as the potential June Cabinet report to seek approval to move to statutory consultation. This is confirmed in the minutes of the meeting.
- 1 May 2018 – the CEO and HSSU met with the school working party/governors to consider further the nature and process involved to proceed with any federation proposal.
- 11 July 2018 – the CEO and HSSU met with the governing body to discuss federation options

1.9 The local authority has powers to direct the federation of schools but considered 'forced' federation as an option that would not work and that closure would be the best option to address the educational challenges facing the learners at Craigcefnparc Primary School. This was based on the following:

- Craigcefnparc Primary School would continue to have a part-time headteacher leading the school, with a continued risk of failure to maintain sustainability of appropriate educational provision due to the need to ensure appropriate management of each school site.
- Federation would not improve Craigcefnparc's capacity to self-improve and to meet the demands of the new curriculum as quickly as moving learners to another school.
- The demands of the new curriculum will impact more on smaller schools. Existing staff in a federation are not required to work in another school unless they agree to move to a flexible contract but a flexible contract would put them at greater risk of redundancy should one of the schools in the federation be unable to set a balanced budget.
- Federation would not effectively address the projected number of pupils at the school as parental preference would have to be met and the number of applications to Craigcefnparc Primary School is reducing each year, with higher year groups in Key Stage 2 than in the Foundation Phase. There is sufficient capacity at Clydach Primary School to accommodate learners from Craigcefnparc.
- Future liabilities in terms of building maintenance costs would remain and energy costs are increasing (the school operates on an oil system).
- Federations should not be seen as a financial saving and therefore Craigcefnparc would continue to be in a position where they could

not set a balanced budget without reducing their staffing levels, impacting on the educational provision for learners.

- Pupils would remain in the same mixed age cohorts although there would be some opportunities to undertake activities with pupils on other sites but with staff/pupils travelling to provide the same breadth of curriculum support as would be available on a single site if Craigcefnparc closed and pupils moved to Clydach.
- The likelihood of successful outcomes from federation is greatly improved with the full ownership of both schools, and there has been no indication to date of such interest from another school.
- The cost per pupil is £4,742 compared with a county average of £3,487 and this unbalanced distribution would remain.

However, local authority officers have offered to meet with the governing bodies of a number of schools to provide appropriate factual information about federation to enable them to consider, and if they so wish, propose federation. No other schools have proposed to federate with Craigcefnparc Primary School. The following school governing bodies have discussed federation and confirmed at their meetings that they did not wish to federate with Craigcefnparc Primary School:

- Craigfelen Primary School – 10 September 2018
- Glais Primary School – 12 September 2018
- Clydach Primary School – 31 January 2019

1.10 Consultation took place as is required in the Welsh Government's School Organisation Code between 5 September and 18 October 2018. This involved the circulation of consultation papers to learners, parents, staff and governors at the affected school as well as to other interested parties. The consultation paper and related documents can be found on the council's website <https://www.swansea.gov.uk/craigcefnparcconsultation>

1.11 A number of consultation meetings and drop-in sessions were also held.

1.12 On 20 December 2018, Cabinet considered the responses received and the Consultation Report that had been produced and approved the publication of statutory notices inviting any formal objections to the proposal.

2. Statutory Notice and Objections

2.1 The statutory notice period ran from 9 January 2019 to 6 February 2019.

2.2 39 written objections were received (one of these being after the end of the objection period). A draft Objection Report is attached at Appendix A for Cabinet to consider. This includes a summary of all objections received and the local authority response to those objections. It should be noted that Cabinet members have also had access to all written objections in full in advance of the meeting to support them in their determination of the proposal.

The main objections raised were:

Education, Standards and Leadership

- 2.3 *Objectors feel that the authority has not given as much relative support to Craigcefnparc as to other schools. The acting headteachers are bringing about change to improve the school and should be given time to continue that work. The school should be kept open for another year to prove that it has recovered and improved.*

Council response: As in section 1.3, Challenge Advisers from regional consortia evaluate a school's capacity to improve, taking account of evidence about the standards achieved and the quality of leadership and learning and teaching. They also use information from the Welsh Government to inform this evaluation and discussions with schools. They use this information to decide on each school's final support category. The final categorisation is a colour code that shows the level of support a school needs – green, yellow, amber or red, with the schools in the green category needing the least support and those in the red category needing the most intensive support. Each school will receive a tailored programme of support, challenge and intervention based on this category. Craigcefnparc Primary School has been categorised by ERW, the regional consortia, as a school causing concern for most (80%) of the intervening years between December 2013 and December 2018. In December 2013, the Lead Director for ERW categorised the school as one causing concern and listed the areas for development as: a) Continue to challenge all pupils to raise attainment both at the expected level and the expected level +1 b) Continue to develop the governing body to enable them to establish a clear link between strategic planning and improved pupil outcomes c) Continue to work with the Education Welfare Service to improve pupil attendance. In 2014, the school disagreed with the areas that required improvement, including the role of the governing body. As a result, there was a period between 2013-2015 where the school was unreceptive to their entitlement for support because of a refusal to accept the categorisation of a school causing concern. During the last five years, school improvement officers have worked intensively to support progress on areas for development identified by the local authority, parents and external regulators, and this high level of support stands out in comparison to other schools (see Appendix C for support given to Craigcefnparc Primary School). The council has also successfully bid for Small and Rural School Grant in the current financial year to provide supply cover for staff members to attend training courses for their professional development.

- 2.4 *Objectors feel the council were too slow to provide support and bring about leadership changes in the past, which have contributed to a drop in pupil numbers. The council has not allowed governors to advertise for a new headteacher, adding to their case that the school is not sustainable.*

Council response: The local authority must follow proper due processes with regard to staffing and HR issues, which inevitably take time,

particularly where complex issues involve extensive union involvement. As previously mentioned, the local authority has supported Craigcefnparc Primary School while their substantive headteacher was absent from school by identifying a quality acting headteacher from another school and funding this post for some time. That person then independently applied for a permanent headteacher post in a larger school and was successful in getting the job. The budget position at the school has led to the substantive deputy headteacher acting up as headteacher but working for at least two days a week in the classroom, having the least non-contact time of any headteacher in Swansea. The budget projections for coming years highlight increased pressures on schools. It is unlikely that a headteacher will be attracted to a school with under 50 learners and that is in an 'amber' support category.

- 2.5 *The school is a good school with improving standards/categorisation and should be given a chance to recover to normal pupil levels. Stating that the overall quality of education at Craigcefnparc is poor in comparison to neighbouring schools is damning yet results for Foundation Phase and Key Stage 2 are the same as at Clydach Primary School. The 'amber' regional categorisation has been quoted out of context and the previous yellow categorisation has been ignored. Clydach Primary School were also yellow.*

Council response: The school has improved with a great deal of support from the local authority (both officer time and financial support), through the dedication of the acting headteacher (provided by the local authority) and the focusing of school staff and governors to address issues that have been identified. However the local authority's view is that this is not sustainable with reducing pupils on roll, increasing budget pressure and a new curriculum to embrace and, although the school had progressed from a 'red' to 'yellow' support category it has now dropped back to 'amber'. The school is unable to sufficiently fund the supply staff costs needed to release staff for training and this will be vital to prepare for the new curriculum. The acting headteacher is also restricted to the school site in the main due to teaching commitments and leadership requirements and therefore is unable to attend professional development opportunities. As is mentioned above, the school is unlikely to recruit a headteacher for a school with under 50 learners that is in an 'amber' support category. The school has shown evidence of improvement when the local authority intervened to place a temporary headteacher in post, at a time when the school was a high-risk school. However, the current acting headteacher accepts that the school requires more support than it did previously, hence the amber categorisation in autumn 2018.

Travel and Transport

- 2.6 *The streets around Clydach Primary School are already narrow and congested. There will be additional traffic/buses. The council's own traffic assessment does not recommend the relocation of Craigcefnparc children to Clydach. No consultation has taken place with residents on proposed*

increased traffic and calming measures, which may not be feasible. Concern from residents in Clydach that traffic at the start and end of the school day is already an issue, and emergency vehicles would not get through the narrow and busy streets.

Council response: Areas around schools are usually busy at the start and end of a school day. The council had identified the need for some additional traffic measures at the Clydach site in the consultation paper (following on from a school safety assessment provided to the Welsh Government a few years ago). These will progress for 1 September 2019 regardless of the outcome of the school closure consultation, and at a cost of approximately £67k which includes an estimate for road resurfacing that could be required. There would be three additional minibuses required if the Craigcefnparc learners were transported to site, plus some additional cars if learners did not use the bus. Clydach school have introduced a different end to the school day for the junior site and they now finish 10 minutes earlier than the infant site, easing congestion. It should be noted that there are traffic concerns at the Craigcefnparc school site as well, including issues with parental parking, and the safety assessment report to the Welsh Government identified the need for traffic calming (narrowing) and the creation of a footway at a cost of approximately £40k.

- 2.7 *There is no safe walking route to Clydach from Craigcefnparc. More information is needed on transport logistics. The proposal denies children the opportunity for exercise/fresh air walking to school. Increasing the traffic on the road into Craigcefnparc is dangerous.*

Council response: All statutory aged pupils in the Craigcefnparc catchment area would have free transport to Clydach Primary School. The proposal is to provide three minibuses to take the learners from Craigcefnparc, with each minibus having a transport assistant as well as the driver. Bus pick up is not necessarily from home and suitable pick-up points would be arranged, with learners still having to walk to get to these points. Traffic assessments note that many children are taken to Craigcefnparc Primary School by car and do not walk.

- 2.8 *Buses will not be able to stop outside the school and pupils will have to walk from the bus stop/on the busy high street. Children would have to wait at bus stops on their own. Who is responsible for the children while on the bus? My child is being assessed for special needs so would need extra support on a bus or a taxi to school whereas we currently walk. Will a bus always be provided?*

Council response: Each of the three proposed minibuses would have a passenger assistant. As well as looking after the children on each bus, he or she would be responsible for walking their group of children between the bus and the school entrance in the morning and between the school entrance and the bus in the afternoon. The passenger assistant would be responsible for the children but ultimately the local authority is responsible for the safety of all children. Parents would be responsible for taking their children to the pick-up points, as they are now to take them to school. Any

child with a Statement of Special Educational Needs will have their transport requirements assessed and needs met appropriately. The council has a duty to meet the ongoing requirements of their transport policy.

- 2.9 *As the bus will only be provided for the start and end of the school day for statutory school age learners, children will be unable to access nursery, breakfast club or after school club/sports (unless parents arrange their own transport, adding to congestion). It is not practical for those not getting the bus to walk as the roads are dangerous. Parents wanting to go back to work will not be able to use the wraparound provision.*

Council response: The council is responsible for transporting pupils for statutory education in accordance with approved transport policy. Parents are responsible for getting their learners to and from any out-of-school activities such as breakfast club and after school club. However, if the consistent demand is there, it is possible for some of the minibuses to leave Craigeffnparc earlier to allow children to attend breakfast club.

Community Impact

- 2.10 *Major impact on village and local businesses. The village will be a less attractive place for families to live and will lead to the death of a vibrant, living community. Social isolation for villagers (elderly etc. Parents and pupils socially interact on the walk to school and at the school gates. The school takes part in community activities such as carol concerts in the chapel. Will impact on the mental wellbeing of the community).*

Council response: There are many villages in Swansea without a school. This proposal has been made for educational reasons and these must be paramount over a perceived impact on the community. There will still be a large and well used community hall in the village. The school facilities are not used for the wider community.

- 2.11 *No visit or consultation with the community took place to produce the Community Impact Assessment. The Community Impact Assessment only considers use of the school buildings. There was no Community Impact Assessment for Clydach. Cabinet members should have visited Craigeffnparc and Clydach before voting. Cabinet members should have met with the community.*

Council response: The required content of the Community Impact Assessment is laid out in the School Organisation Code. The assessment needs to consider what the school offers to the community in respect of community access (Craigeffnparc school does not offer community access other than the parent and toddler group) and out-of-hours provision for learners. There is a well-used community centre that services the village of Craigeffnparc. The assessment also covered community use of the Clydach school building. Site visits by Cabinet members is not required by the School Organisation Code; however Cabinet members are

familiar with the area and the schools. Educational and other statistics have been presented in the Cabinet reports and consultation paper.

3. Financial Implications

Capital

- 3.1 Approximately £67k will need to be identified for road traffic calming measures outside Clydach Primary School, including required road resurfacing, as was highlighted in the traffic assessment that was presented to Cabinet on 20 December 2018. This funding will come from the existing highways capital scheme envelope and the works will progress regardless of the outcome of this statutory process.
- 3.2 A capital investment of around £50k will be provided from uncommitted capital budgets across education schemes to reorganise the toilet facilities for the Foundation Phase at Clydach Primary School and provide better access and improved location of provision for younger pupils.

Revenue

- 3.3 Schools are funded from an overall delegated budget – the Individual Schools Budget (ISB). There is a funding formula that allocates a budget share to each individual school from the ISB. The budget share for Clydach Primary School would increase to include the number of learners moving there from Craigcefnparc Primary School.
- 3.4 There will be ongoing transport costs of approximately £56k per year to provide three minibuses/small coaches for the learners from Craigcefnparc as there is no available walking route.
- 3.5 Closure of schools can lead to some initial increased costs, for example redundancy costs. Although we would recommend to governors at Clydach Primary School that any new posts to support the additional learners are ring-fenced to existing employees at Craigcefnparc Primary School, there could be some staff that are unsuccessful in matching against a post. If these staff were not successfully redeployed elsewhere, or did not wish to take up voluntary redundancy or early retirement options, there could be redundancy costs that are currently charged to central budgets.

4. Legal Implications

- 4.1 Part 1 of the Education Act 1996 (“the 1996 Act”) imposes a number of general duties on all local authorities in Wales. The general duty in section 13 of the 1996 Act is to contribute (so far as the Council’s powers enable them to do so) towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education and secondary education are available to meet the needs of the population of their area.

- 4.2 Section 13A(3) of the 1996 Act states that a local authority in Wales must ensure that their relevant education functions and their relevant training functions are exercised by the authority with a view to promoting high standards, and promoting the fulfilment of learning potential by every person to whom the subsection applies, including those who are of compulsory school age or are below school age and are registered as pupils at schools maintained by the authority.
- 4.3 Section 14 of the 1996 Act then provides that the Council shall secure that sufficient schools for providing primary education and secondary education are available in the Council's area. Schools available for an area shall not be regarded as sufficient unless they are sufficient in number, character and equipment to provide for all pupils the opportunity for appropriate education. Appropriate education means education which offers such variety of instruction and training as may be desirable in view of:
- (a) the pupils' different ages, abilities and aptitudes; and
 - (b) the different periods for which they may be expected to remain at school, including practical instruction and training appropriate to their different needs.
- 4.4 Reorganisation of school provision involving the establishment or discontinuance of community schools requires consultation and the publication of statutory notices in accordance with the School Standards and Organisation (Wales) Act 2013 ("the Act") and the Welsh Government's School Organisation Code.
- 4.5 Before publishing any proposals relating to the establishment of a school under s41 of the Act, or discontinuing a school under s43 of the Act, the Authority (Proposer/s) is under a duty, by virtue of s48 of the Act, to consult on such proposals. Guidance has been issued by the Welsh Government in Circular 006/2013 entitled the "School Organisation Code" which must be followed:
- a) At the start of the consultation period Proposers must provide consultees with a consultation document and give them at least 42 days in which to respond, with at least 20 of these being school days.
 - b) Consultation comments must be collated and summarised by Proposers. This summary together with the responses to the comments must be published in a consultation report within three months of the end of the consultation period.
 - c) A decision must be made by Proposers whether to proceed with changes within 6 months of the end of the consultation period.
 - d) If a decision is made to proceed, a Statutory notice is published providing a 28 day notice period for objections. The notice must be published on a school day and with 15 school days (not including the day of publication) in the notice period.

- e) If objections are received, an objection report must be published providing a summary of the objections with responses to them before the end of 7 days beginning with the day of the Proposers determination of the proposals.
- f) The Proposer must determine under s53 whether the proposals are to be implemented. Proposals must receive final determination within 16 weeks of the end of the objection period. Local determination is a requirement of the School Organisation Code, and The Local Authorities (Executive Arrangements) (Functions and Responsibilities) (Wales) (Amendment) Regulations 2013 allow for this local determination. The Welsh Ministers and Governing Bodies are to be notified of the decision within 7 days of the decision.
- g) If the Proposer determines to implement proposals, they should be implemented in accordance with the date given in the statutory notice, or any subsequent modified date.
- 4.6 The proposer must publish a report on the consultation it has carried out in accordance with the Code. The consultation report must summarise each of the issues raised by consultees, responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and setting out Estyn's view (as provided in its consultation response) of the overall merits of the proposal.
- 4.7 The School Organisation Code specifies the detail that the equality and community impact assessments must cover and full consideration needs to be given to these before any decision is made.
- 4.8 The Code includes statutory guidance to which the Council must have due regard and sets out the policy context, general principles and factors that should be taken into account by those bringing forward proposals to reconfigure school provision and by those responsible for determining proposals. Where guidance is given by the Code, it is stated that relevant bodies should follow this guidance unless they can demonstrate that they are justified in not doing so.
- 4.9 Paragraph 1.1 of the Code sets out the key background principles and policies, which should be taken into account by the Council in developing school organisation proposals. These include:
- United Nations Convention on the Rights of the Child;
 - A living language: a language for living – Welsh Language Strategy 2012-2017
 - Welsh- medium Education Strategy;
 - One Wales: One planet, a new sustainable development scheme for Wales May 2009 or any successor strategy;
 - Child Poverty Strategy for Wales (issued February 2011

Information document number 95/2011), or any successor strategy;

- Faith in Education.

4.10 In addition, when developing school organisation proposals, the local plans to which Council should have regard include the following:

- Local plans for economic or housing development;
- Welsh in Education Strategic Plans (made under part 4 of the 2013 Act);
- Children and Young People's Plans (or successor plans)
- 21st Century Schools – Capital Investment Programme and the relevant wave of investment.

4.11 Finally, the Council should have regard to the following Welsh Government Guidance on related matters:

- Learner Travel Operational Guidance
- Measuring the capacity of schools in Wales, Circular.

4.12 Chapter 1 then lists a number of factors which should be taken into account by relevant bodies, including the Council, when exercising their functions of preparing and publishing school organisation proposals or approving/determining them. These factors include:

- Quality and standards in education (looking at outcomes, provision, leadership and management) at the school which is the subject of the proposals, and at any other school or educational institution which is likely to be affected. The Code states that local authorities should place the interests of learners above all others. Where proposals involve the transfer of learners to alternative provision, there should normally be evidence that the alternative would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners.
- The need for places and the impact on accessibility of Schools (whether alternative school based provision will have suitable capacity and provide accommodation of at least equivalent quality and is sufficient to meet existing demand and projected demand and the nature of journeys to alternative provision and resulting journey times for pupils, including SEN pupils. In particular, whether primary school pupils will have one way journeys in excess of 45 minutes or secondary school pupils one way journeys of over an hour.
- Resources of education and other financial implications. This involves a consideration of a number of factors set out in the Code, including whether proposals ensure a fairer and more equitable distribution of funding between mainstream schools, what effect proposals will have on

surplus provision, the costs of proposals (including additional transport costs), any projected net savings, any budget deficits of schools affected and whether the proceeds of sales of redundant sites remain in the education budget.

4.13 The Code also lists other general factors which should be taken into account, namely educational attainment, equality issues, charitable interests (paragraph 1.6). A list of specific factors in the consideration of school closures is at paragraph 1.7. This states that there is no presumption in favour or against the closure of any type of school. The case for closure should be robust and in the best interests of educational provision in the area. A Community Impact Assessment should be obtained. When considering whether closure is appropriate, special attention should be given to the matters set out on page 12 of the Code, including:

- considerations of alternatives to closure, including multi-site schools, clustering/collaboration/federation with other schools
- the overall effect of closure on the local community
- how parent's and pupil's encouragement with the alternative school and any facilities it may offer could be supported.

4.14 In addition to the usual considerations in relation to standards of provision, the Council should also consider whether proposals will improve standards of accommodation for pupils with SEN, including building accessibility;

- how proposals will address any health, safety and welfare issues;
- how proposals, where appropriate, will support increased inclusion; and
- the impact of proposals on other SEN provision within the immediate and wider local authority area including out of county where appropriate.
- whether there is a need for a particular type of SEN provision within the area;
- whether there is surplus SEN provision within the area;
- whether SEN provision would be more effective or efficient if regional provision were made; and
- the impact of proposals on the transportation of learners with SEN.

4.15 The list of factors to be taken into account in approving/determining school organisation proposals is listed at paragraph 1.14.

4.16 Paragraph 5.1 of the Code makes provision for the publication of objection reports. Proposers must publish a summary of the statutory objections and the proposer's response to those objections. Where a local authority is required to determine its own proposals, the Objection Report must be published before the end of 7 days beginning with the day of its determination. The Objection Report must be published by being posted on the local authority's website. Hard copies must be made

available on request. Parents, carers and guardians and staff members of schools which are the subject of the proposals must be advised of the availability of the Objection Report. The Code contains a list of individuals or bodies which must receive either a hard copy of the Objection Report or be emailed a link to the local authority's website.

- 4.17 The Well-being of Future Generations (Wales) Act 2005 mandates that public bodies in Wales must carry out sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the 'well-being goals'.
- 4.18 The 'well-being goals' are:
- (i) a prosperous Wales, meaning an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work;
 - (ii) a resilient Wales, meaning a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change);
 - (iii) a healthier Wales, meaning a society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood;
 - (iv) a more equal Wales, meaning a society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances);
 - (v) a Wales of cohesive communities, meaning attractive, viable, safe and well-connected communities;
 - (vi) a Wales of vibrant culture and thriving Welsh language, meaning a society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation; and
 - (vii) a globally responsible Wales, meaning a nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being
- 4.19 Any reference to a public body doing something in accordance with the 'sustainable development principle' means that the body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.
- 4.20 In order to act in a sustainable manner a public body must take account of

- (1) the importance of balancing short-term needs with the need to safeguard the ability to meet long-term needs, especially where things done to meet short-term needs may have detrimental long-term effect;
- (2) the need to take an integrated approach, by considering how
 - (a) the body's well-being objectives may impact on each of the well-being goals); and
 - (b) the body's well-being objectives impact on each other or on other public bodies' objectives, in particular where steps taken by the body may contribute to meeting one objective but may be detrimental to meeting another;
- (3) the importance of involving other persons with an interest in achieving the well-being goals and of ensuring those persons reflect the diversity of the population of
 - (a) Wales (where the body exercises functions in relation to the whole of Wales); or
 - (b) the part of Wales in relation to which the body exercises functions;
- (4) how acting in collaboration with any other person (or how different parts of the body acting together) could assist the body to meet its well-being objectives, or assist another body to meet its objectives;
- (5) how deploying resources to prevent problems occurring or getting worse may contribute to meeting the body's well-being objectives, or another body's objectives

4.21 Swansea Council applies the Well-being of Future Generations Act (Wales) 2015 as the core principle guiding how the local authority operates.

4.22 The action a public body takes in carrying out sustainable development must include:-

- Setting and publishing objectives ('well-being objectives') that are designed to maximise its contribution to achieving each of the well-being goals; and
- Taking all reasonable steps (in exercising its functions) to meet those objectives

Swansea Council's well-being objectives and steps are set out within the Corporate Plan:

<https://www.swansea.gov.uk/?articleid=6901&articleaction=language>

Local Well-being Objectives are set out within Swansea Public Services Board's Local Well-being Plan (of which the Council is a statutory member).

4.23 Report writers and decision makers take due regard to these Plans in order to consider how the proposal impacts upon the Council's 'wellbeing objectives', Swansea's Local Well-being Objectives and the national well-being goals'. <https://www.swansea.gov.uk/localwellbeingplan>

5. Equality and engagement implications

- 5.1 The Council is subject to the Public Sector Equality Duty (Wales) and must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
 - Advance equality of opportunity between people who share a protected characteristic and those who do not
 - Foster good relations between people who share a protected characteristic and those who do not

Our Equality Impact Assessment (EIA) process ensures that we have paid to regard to the above.

- 5.2 An Equality Impact Assessment was commenced as a background paper to the consultations. The EIA was revised to take full account of the consultation outcomes and the views of the range of stakeholders that were gathered. A further revision has been made to take account of objections made during the statutory notice period. This can be found in Appendix B.

- 5.3 The proposal was found to be relevant to children and young people, older people, other age groups, disability, sex, Welsh language, poverty/social exclusion and community cohesion. The impact on each of these areas is explored further as follows.

- 5.3.1 (0-18) – Craigcefnparc is an English-medium primary school. This proposal looks to close the school and move the pupils to Clydach Primary School. Although the change can be seen as negative in the first instance, we believe that based on favourable Estyn inspection results, and the increased flexibility in delivering the curriculum that Clydach Primary could offer, that pupils would receive at least a similar, if not an improved education should this proposal go ahead. If the proposal was approved officers would work with both schools to ensure that the transition for learners and their families was planned and delivered with the best interests of the learner a main priority.

- 5.3.2 (Older People 50+/Any other age group) –there is the chance of some redundancies because of this proposal. The Council would recommend that any new staff posts required at Clydach Primary, or other neighbouring schools due to increase in pupil numbers, be ‘ring-fenced’ to the staff of Craigcefnparc Primary School. However, this would be a decision for individual governing bodies.

- 5.3.3 (Disability) – The design, delivery and implementation of this proposal will take full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. Any proposal will be designed with this in mind. Craigcefnparc and Clydach currently have a similar level of children who have special educational needs with both schools offering the right

level of support for these pupils. There are currently no pupils from Craigcefnparc with a Statement of Educational Need, however should there be a need for a Statement of Educational Need for any learner in the future that statement would set out the required support for that child and what the school needs to provide. Clydach Primary School currently delivers on such Statements for some of its current learners.

5.3.4 (Welsh) – Craigcefnparc is an English-medium primary school but the Welsh language plays a key role throughout the curriculum. This would continue to be the case at Clydach Primary School.

5.3.5 (Poverty/social exclusion) – There are low levels of deprivation in this area and therefore the impact on poverty/social exclusion is expected to be low. Due to the possible changes in catchment areas it is important to consider the impact this could have on learners and their families. During the consultation concerns were raised about the requirement to travel further to access the educational provision at Clydach Primary School with the home to school transport only providing a service for the beginning and end of the school day and not factoring in the desire to access wrap-around services as they currently do at Craigcefnparc. The Council is responsible for transporting pupils for education. Parents/carers of our learners are responsible for getting their learners to and from any out of school activities such as breakfast club and after school club; however, if the consistent demand is there, it is possible for some of the minibuses to leave Craigcefnparc earlier to allow children to attend breakfast club.

5.3.6 (Community Cohesion) – It is possible that the proposed closure could have a negative impact on the local community and due to the possible changes in catchment areas it is important to consider the impact this could have on learners and their families. The Council's Local Well-being Plan has an objective 'To build strong communities with a sense of pride and belonging'. The definition of communities is not restricted to specific physical communities of any particular size but includes communities of interest too. The council's plans support the development of a new community which will be created at Clydach Primary School. Arguably, this is an opportunity to be part of a more diverse community with potential benefits in terms of experiencing a wider range of cultures, languages and communities that can enrich pupils' experience. The most relevant of the 3 steps under the objective is 'individuals are connected and feel a sense of belonging' and, while this is true of a small school community, it is also true of larger school communities which tend to benefit from greater intercultural opportunities.

5.3.7 (Sex) – Given that the majority of staff at the school are female it is clear that this proposal would have a disproportionate effect on this group. 8 of the 9 members of staff employed at the school are female.

5.3.8 The remaining protected characteristics (namely Race, Asylum Seekers, Gypsies and travellers, Religion, Sexual Orientation, Gender reassignment, Carers, Marriage and civil partnership, Pregnancy and

maternity) have all been identified as 'neutral' as we do not believe the proposal will have either a negative or a positive impact on them. However, this will continue to be monitored and reconsidered throughout the process.

5.4 To ensure that we understood how these proposals affected all stakeholders we consulted widely to allow us to shape this proposal and agree the way forward.

5.5 As stated earlier in this report, a full consultation was conducted with all interested stakeholders from 5 September 2018 to 18 October 2018.

5.6 All initiatives must be designed/planned in the best interests of children and young people.

5.7 The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

5.8 The proposal will directly affect children and all future arrangements will aim to ensure that these children and young people achieve the best possible outcomes. The proposal relates to the following articles of the United Nations Convention on the Rights of the Child:

Article 3 - All organisations concerned with children should work towards what is best for each child.

Article 12 - Respect for the views of the child

Article 18 - Both parents share responsibility for bringing up their children. We should help parents by providing services to support them.

Article 28 - Children have a right to an education. Discipline in schools should respect children's human dignity.

Article 29 - Education should develop each child's personality and talents to the full.

Article 30 - Children have a right to learn and use the language and customs of their families.

5.9 A Community Impact Assessment was produced and has been available throughout the consultation period on the Council's website <https://www.swansea.gov.uk/craigcefnparcconsultation>. This assessment has been reviewed following the consultation and objection periods and still recognises that there is very limited use of the school by the community and that there is a well-used community hall in Craigcefnparc.

5.10 Swansea Council acts in accordance with the Well-being of Future Generations (Wales) Act in all it does. Sustainable development has been a central organising principle since 2012 and each year the council aims to further embed and build on sustainable practice.

The focus is on integrating behaviour change so that the five ways of working and maximisation of each of the national well-being goals are implicit in how services operate as a whole council.

Long term - The proposal ensures the long term sustainability of education in the wider community and sufficient school places to meet the needs both now and in the future across the county.

Prevention – The proposal seeks to prevent the escalation of issues in relation to the sustainability of appropriate standards of educational provision for pupils, particularly with the demographic profile of the area, an anticipated continuing decline in pupil numbers, and the implications of the new curriculum, so continuing to offer children the best start in life.

Integration - The decision making process has taken into account the wider Swansea context by being aware of the local wellbeing objectives set out in Swansea's Local Wellbeing Plan. The impact on integration is neutral because we are ensuring that all school learners have a place and therefore it is not anticipated that it will impact on other agencies such as social services and health.

Collaboration - The proposal has been developed across the council and consultation with stakeholders has been wide, as per the School Organisation Code.

Involvement - Rigorous consultation processes have been followed and there was also significant early engagement of stakeholders prior to any Cabinet reports being considered.

6. Conclusion

6.1 In approving and determining school organisation proposals, Cabinet needs to take into account a number of factors:

6.1.1 Quality and Standards of Education

That they are satisfied that the proposals would deliver outcomes and offer provision at least equivalent to that which is currently available to learners, including those with special educational needs.

Officers are satisfied that Clydach Primary School will provide at least equivalent outcomes and provision.

6.1.2 Need for Places and the Impact on Accessibility of Schools

For school closure, they must be satisfied that the alternative school has sufficient capacity and provides accommodation of at least equivalent

quality for existing and projected pupil numbers. The alternative provision should be of the same nature with regard to language category. Travel time for primary aged learners should not exceed 45 minutes and sustainable transport should be encouraged.

Officers are satisfied that there is sufficient capacity at Clydach Primary School for the 40 full-time pupils and nursery children at Craigcefnparc Primary School. Clydach Primary School has the same language category and learners will not travel for more than 45 minutes.

6.1.3 Resourcing of Education and Other Financial Implications

It is important that funding for education is cost effective. Proposals should ensure a fairer and more equitable distribution of funding between schools. They should also address surplus capacity in schools, particularly if they have “significant” levels, defined as 25% or more of a school’s capacity and at least 30 places. Proposals that are part of the 21st Century Schools Investment Programme contribute to the delivery of sustainable schools and the school estate but removing maintenance backlogs and school buildings that are inefficient or in poor condition. The comparative cost of proposals should also be considered, as well as if the affected schools would face budget deficits.

Officers are satisfied that the proposal for Craigcefnparc Primary School will ensure a fairer distribution of funding between schools. Craigcefnparc Primary School had 52.13% (49) surplus places at September 2018. The proposal will remove backlog maintenance at Craigcefnparc Primary School.

6.1.4 Community Impact

Cabinet should consider how any community facilities provided by the school could be maintained. They should also pay attention to whether alternatives to closure have been considered.

Officers have identified that only a parent and toddler group use the school building at Craigcefnparc Primary School in the Community Impact Assessment. Officers have not considered there to be any alternative to closure; however objectors are determined that the school can be sustainable and standards can improve if the threat of closure is removed.

6.1.5 General Factors

Cabinet should also consider the impact the proposals will have on children from economically deprived backgrounds and equality issues.

Officers have not raised any concerns through the Equality Impact Assessments.

6.2 When approving or determining proposals, relevant bodies:

- must consider whether there are any other related proposals
- must ensure that the statutory consultation has been conducted in accordance with the School Organisation Code
- must ensure that the proposal has been published in accordance with the Code and the notice contains all the required information
- must consider the consultation document and consultation report

- must consider the objections and the objection report and any responses to the notice supporting the proposals

Background papers:

- Report to Cabinet 21 June 2018
- Report to Cabinet 20 December 2018
- School Standards and Organisation (Wales) Act 2013
- Welsh Government School Organisation Code (Circular 006/2013)
- School Standards and Framework Act 1998
- The Education (Determination of Admission Arrangements) (Wales) Regulations 2006
- Welsh Government's Admissions Code (Circular 005/2013)

Appendices:

- | | |
|------------|--|
| Appendix A | Draft Objection Report |
| Appendix B | Equality Impact Assessment |
| Appendix C | Summary of support provided to Craigefnparc Primary School |



Objection Report:

Proposal to Close Craigcefnparc Primary School

This report is published in line with requirements under section 49 of the School Standards and Organisation (Wales) Act 2013

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1. BACKGROUND

Craigcefnparc Primary School is in the village of Craigcefnparc in Swansea.

At January 2018, it had 54 full-time (FT) pupils on roll from the ages of 4 to 11, plus 2 part-time nursery children. At September 2018, there were 45 FT plus 4 nursery children on roll. At January 2019, the number on roll had dropped further to 40 FT plus 7 nursery. There are three mixed-age classes in the school. The number on roll has been declining for the last five years.

The last Estyn inspection of the school was in May 2015 with the school's performance being adequate at the time and with adequate prospects for improvement and was placed in a category of Estyn monitoring. The school was removed from Estyn monitoring in October 2016 after considerable support from the local authority and investment of time by school staff. The Estyn report can be found here: <https://www.estyn.gov.wales/provider/craigcefnparc-primary-school>

The school has a new acting headteacher since September 2018 who has had to take on a part-time teaching role to balance the school's budget.

The local authority has consulted on a proposal to close Craigcefnparc Primary School with effect from 31 August 2019. It is proposed that the current catchment area is transferred to Clydach Primary School. Transport to Clydach Primary School would be provided for all pupils living in Craigcefnparc.

Following consultation, Cabinet considered the responses received on 20 December 2018, and agreed to move the proposal forward to the publication of a statutory notice, as is required by the School Standards and Organisation (Wales) Act 2013. The notice was published on 9 January 2019 and objections were invited until 6 February 2019.

2. OBJECTIONS TO THE STATUTORY NOTICE

39 written objections were received (one of these being after the end of the objection period).

The objections were:

	Point Raised	Local Authority Response	Number of Written Responses Raising Point	% of Written Responses Raising Point
	Travel/Transport			
1	<p>The streets around Clydach Primary School are already narrow and congested. There will be additional traffic/buses. The council's own traffic assessment does not recommend the relocation of Craigcefnparc children to Clydach. No consultation has taken place with residents on proposed increased traffic and calming measures, which may not be feasible. Concern from residents in Clydach that traffic at the start and end of the school day is already an issue, and emergency vehicles would not get through the narrow and busy streets.</p>	<p>Areas around schools are usually busy at the start and end of a school day. The council had identified the need for some additional traffic measures at the Clydach site in the consultation paper (following on from a school safety assessment provided to the Welsh Government a few years ago). These will progress for 1 September 2019 regardless of the outcome of the school closure consultation, and at a cost of approximately £67k, which includes an estimate for road resurfacing that could be required. There would be three additional minibuses required if the Craigcefnparc learners were transported to site, plus some additional cars if learners did not use the bus. Clydach school have introduced a different end to the school day for the junior site and they now finish 10 minutes earlier than the infant site, easing congestion. It should be noted that there are traffic concerns at the Craigcefnparc school site as well, including issues with parental parking, and the safety assessment report to the Welsh Government identified the need for traffic calming (narrowing) and the creation of a footway at a cost of approximately £40k.</p>	31	79%

2	The public bus service is already limited and could reduce, so parents would struggle to get their children to Clydach and back, outside of home to school transport, if they did not have a car.	The public bus would not be affected by this proposal.	1	3%
3	There is no safe walking route to Clydach from Craigcefnparc. More information is needed on transport logistics. The proposal denies children the opportunity for exercise/fresh air walking to school. Increasing the traffic on the road into Craigcefnparc is dangerous.	All statutory aged pupils in the Craigcefnparc catchment area would have free transport to Clydach Primary School. The proposal is to provide three minibuses to take the learners from Craigcefnparc, with each minibus having a transport assistant as well as the driver. Bus pick up is not necessarily from home and suitable pick-up points would be arranged, with learners still having to walk to get to these points. Traffic assessments note that many children are taken to Craigcefnparc Primary School by car and do not walk.	19	49%
4	Buses will not be able to stop outside the school and pupils will have to walk from the bus stop/on the busy high street. Children would have to wait at bus stops on their own. Who is responsible for the children while on the bus? My child is being assessed for special needs so would need extra support on a bus or a taxi to school whereas we currently walk. Will a bus always be provided?	Each of the three proposed minibuses would have a passenger assistant. As well as looking after the children on each bus, he or she would be responsible for walking their group of children between the bus and the school entrance in the morning and between the school entrance and the bus in the afternoon. The passenger assistant would be responsible for the children but ultimately the local authority is responsible for the safety of all children. Parents would be responsible for taking their children to the pick-up points, as they are now to take them to school. Any child with a Statement of Special Educational Needs will have their transport requirements assessed and needs met appropriately. The council has a duty to meet the ongoing requirements of their transport policy.	10	26%

5	There will be increased CO2 emissions from the extra cars and buses travelling to Clydach. The Welsh Government have an ambition for the public sector to be carbon neutral by 2030.	Nitrogen Dioxide (NO2) is monitored across the local authority in line with guidance produced by DEFRA and the devolved administrations. The objective concentrations that we are required to assess against are unlikely to be effected by the increased traffic flows from the additional vehicles estimated for this proposal at school drop-off and collection times. The increased emissions from traffic need to be weighed against not having emissions from the oil fuelled boiler and other utilities at the Craigeffnparc school site.	7	18%
6	Difficulty in accessing school for Craigeffnparc residents in adverse weather such as snow and ice.	There are currently buses leaving the village to take learners to St. Joseph's Primary School in Clydach, YGG Gellionnen, Birchgrove Comprehensive School, Cwm Tawe Comprehensive School, YGG Bryn Tawe and Bishop Vaughan RC comprehensive. It is only on rare occasions that the weather conditions prevent these buses from running.	2	5%
7	Lone hill is suffering from subsidence on the road, which will get worse if there is additional traffic and buses. This is the only road into Craigeffnparc from Clydach.	There will not be any substantial increase in traffic. The council has a duty to keep this road open and, in the event of any subsidence, would ensure that any necessary work is undertaken.	1	3%
8	As the bus will only be provided for the start and end of the school day for statutory school age learners, children will be unable to access nursery, breakfast club or after school club/sports (unless parents arrange their own transport, adding to congestion). It is not practical for those not getting the bus to walk, as the roads are dangerous. Parents wanting to go back to work will not be able to use the wraparound provision.	The council is responsible for transporting pupils for statutory education. Parents are always responsible for getting their learners to and from any out-of-school activities such as breakfast club and after school club. However, if the consistent demand is there, it is possible for some of the minibuses to leave Craigeffnparc earlier to allow children to attend breakfast club.	13	33%
9	Some children already get a bus to Craigeffnparc school as they live on remote farms. Moving them to	Travel time to school will be within the requirements of the Learner Travel Measure for Wales.	1	3%

	Clydach will increase their travel time to school.			
	Community Impact			
10	Major impact on village and local businesses. The village will be a less attractive place for families to live and will lead to the death of a vibrant, living community. Social isolation for villagers (elderly etc.)	There are many villages in Swansea without a school. This proposal has been made for educational reasons and these must be paramount over a perceived impact on the community. There will still be a large and well-used community hall in the village. The school facilities are not used for the wider community.	12	31%
11	Parents and pupils socially interact on the walk to school and at the school gates. The school takes part in community activities such as carol concerts in the chapel. Will impact on the mental wellbeing of the community.		6	15%
12	What is the plan for the school building in the event of closure?	If the school did close then the building would be considered for other council use or put forward for disposal, including community asset transfer.	1	3%
13	If the YGG Felindre closure proposal also takes place then there will be no school in the Mawr ward at all.	There is another ward in Swansea without a school (Killay South).	1	3%
14	There is a memorial at Craigcefnparc Primary School for the murdered children of Mandy Power and removal of this memorial will cause uproar in the community.	If the school were to close then the memorial would be appropriately relocated.	2	5%
	Size of School/Number on Roll/Class Sizes			
15	Pupil projections are not correct. There is no correlation between birth rate in the area and the size of the school so this argument should not be used. The number on roll would increase if the closure threat were removed. The local authority should admit more pupils to Craigcefnparc instead of other schools that are full. The authority was incorrect when it said there had not been any applications for admission to the school.	The number on roll continues to decrease. The local authority admits all learners where parents request a place if there is space at that school. It cannot direct pupils to another school unless there is no space for them at their preferred school. The larger year groups are in Key Stage 2 (juniors) and numbers being admitted to Foundation Phase (infants) are far lower. This will lead to a declining number on roll as these pupils feed through the school. Numbers in each year group at the September 2018 pupil count were: Nursery = 4,	14	36%

		Reception = 1, Year 1 = 4, Year 2 = 4, Year 3 = 6, Year 4 = 10, Year 5 = 7, Year 6 = 13. At January 2019, Year 4 had dropped to 7 and Year 6 had dropped to 12.		
16	Small and mixed age classes are hugely beneficial to our children. The Estyn report on the benefits of larger schools was generalised. We have produced our own research and know the benefits for our own school.	Clydach also have mixed age classes, as is common in many schools, although this would only be for two year groups in a class. Craigcefnparc have Nursery to Year 2 (all of Foundation Phase) in one class, Years 3 and 4 in another class and Years 5 and 6 in another. As the larger year groups drop out from Key Stage 2 and budgets tighten, it is likely that the school will have to reduce their staffing levels and operate with just one class for the whole of Key Stage 2. This adds pressure to teaching staff who have to cover the appropriate curriculum for the learners in that wide age range with limited teaching assistant support.	7	18%
17	A larger school does not better prepare learners for comprehensive. Staffing of transition days is irrelevant. This claim was baseless.	The effectiveness of leadership and the subsequent development of effective school transition plans will determine success, as opposed to the size of the school. Estyn review reports reflect that transition planning is now a strong feature of the work of most secondary schools and their partner primary schools. Teachers now visit other schools to observe teaching and learning to help them in their planning. Planned cross-curricular learning activities between key stage 2 and 3 feature strongly in school development planning. The national focus on schools developing partnership working and school-to-school collaboration will serve to strengthen this aspect for all schools. The limited staffing at Craigcefnparc would have to support transition to secondary schools (learners can go to Birchgrove Comprehensive School in Swansea but often to Cwm Tawe Comprehensive School in Neath Port Talbot council) as well as	3	8%

		continuing to support the learners in their class in other age groups.		
18	There will be less opportunity to take part in responsible roles e.g. school council, or in sports teams. Clydach does not offer enhanced social or sporting opportunities (contrary to the consultation paper).	Larger schools are likely to have more groups to join with a wider range to interest learners. Small schools struggle with team sports where a minimum numbers of players are required. Numbers at Craigcefnparc are predicted to fall further when the larger year groups in Key Stage 2 leave and this will further limit team sports.	5	13%
19	Small school is like a nurturing family. Children enjoy going to school, as can be seen from attendance statistics. There is less bullying.	This proposal is not because the school is small, it is because the council believes that it is not sustainable and that this will impact on the education of learners, and this must be the council's main objective.	3	8%
20	Some parents prefer a small school for their children and want to have this choice.		2	5%
	Education/Standards/Leadership			
21	Objectors feel the council were too slow to provide support and bring about leadership changes in the past, which have contributed to a drop in pupil numbers. The council has not allowed governors to advertise for a new headteacher, adding to their case that the school is not sustainable. The acting headteachers are bringing about change to improve the school and should be given time to continue that work. The school should be kept open for another year to prove that it has recovered and improved.	The school has had at least four headteachers and has been categorised as a school causing concern for most (80%) of the intervening years between December 2013 and December 2018. In 2014, the school disagreed with the areas that required improvement, including the role of the governing body. As a result, there was a period between 2013-2015 where the school was unreceptive to their entitlement for support because of a refusal to accept the categorisation of a school causing concern. The local authority has supported Craigcefnparc Primary School while their substantive headteacher was absent from school by identifying a quality acting headteacher from another school and funding this post for some time. That person then independently applied for a permanent headteacher post in a larger school and was successful in getting the job. The budget	8	21%

		<p>position at the school has led to the substantive deputy headteacher acting up as headteacher but working for at least two days a week in the classroom, having the least non-contact time of any headteacher in Swansea. The budget projections for coming years highlight increased pressures on schools. It is unlikely that a headteacher will be attracted to a school with under 50 learners and that is in an 'amber' support category. During the last five years school improvement officers have worked intensively to support progress on areas for development identified by the local authority, parents and external regulators, and this high level of support stands out in comparison to other schools. Also see Appendix C of the Cabinet report on 21 March 2019</p> <p>https://democracy.swansea.gov.uk</p>		
22	<p>Craigcefnparc has been given far less advisor support days in the last academic year compared to most schools across the county.</p>	<p>The Welsh Government's guide on categorisation and support can be found here: https://beta.gov.wales/national-school-categorisation-system-guidance-parents-and-carers The local authority gives a set level of Challenge Adviser support for schools in certain categories. However, Craigcefnparc Primary School has received support, both financially and in staff time, well above this level. Despite this support, the school's recent provisional category has dropped to 'amber'. Clear support logs and resource logs evidence that the school has received more than the required support need to accelerate improvements. However, it is the school's own capacity to self-improve without external intervention that presents the biggest challenge, with a few of the areas of improvement noted in December 2013 remaining as areas for improvement in</p>	1	3%

		December 2018. Also see Appendix C of the Cabinet report on 21 March 2019 https://democracy.swansea.gov.uk		
23	<p>The school is a good school with improving standards/categorisation and should be given a chance to recover to normal pupil levels. Stating that the overall quality of education at Craigcefnparc is poor in comparison to neighbouring schools is damning yet results for Foundation Phase and Key Stage 2 are the same as at Clydach Primary School. The 'amber' regional categorisation has been quoted out of context and the previous yellow categorisation has been ignored. Clydach Primary School were also yellow.</p>	<p>The school has improved with a great deal of support from the local authority (both officer time and financial support), through the dedication of the acting headteacher (provided by the local authority) and the focusing of school staff and governors to address issues that have been identified. However the local authority's view is that this is not sustainable with reducing pupils on roll, increasing budget pressure and a new curriculum to embrace and, although the school had progressed from a 'red' to 'yellow' support category it has now dropped down to 'amber'. The school is unable to sufficiently fund the supply staff costs needed to release staff for training and this will be vital to prepare for the new curriculum. In addition, the acting headteacher is restricted to the school site in the main due to teaching commitments and leadership requirements and therefore is unable to attend professional development opportunities. The school is unlikely to recruit a headteacher for a school with under 50 learners that is in an 'amber' support category. The school has shown evidence of improvement when the local authority intervened to place a temporary headteacher in post, at a time when the school was a high-risk school. However, the current acting headteacher accepts that the school requires more support than it did previously, hence the amber categorisation in autumn 2018.</p>	10	26%

24	<p>As transport will not be provided for nursery learners this will impact on families that cannot drive, going against the council's own wellbeing policy and is an equality issue. The Council's Local Development Plan states that early years is a major priority.</p>	<p>Having a priority for Early Years does not mean keeping a potentially unsustainable school open or providing transport for nursery. Home to school transport is provided in accordance with agreed council policy. There are many schools where nursery pupils are not transported to school; however if there are spare seats on the minibuses these can be purchased by parents.</p>	2	5%
25	<p>Craigcefnparc delivers the full curriculum and will continue to do so (contrary to what was described in the consultation paper). The vast majority of pupils that leave the school are high achievers.</p>	<p>Estyn reviewed school size and educational effectiveness in their December 2013 report. The report shows that large primary schools tend to perform better than small and medium-sized schools. Curriculum provision is better in large primary schools. In small schools, there tends to be shortcomings in the provision of foundation subjects at key stage 2. These shortcomings differ from school to school, but are often linked to gaps in the expertise of staff. In these schools, there are three or more age groups in each class and teachers have to plan and deliver lessons that meet the needs of pupils from a wide age and ability range. Leadership and processes to improve quality are usually better developed in large primary schools. In small primary schools, many headteachers have a significant teaching responsibility that limits the time they can devote to leading and managing and they have fewer opportunities to evaluate standards and to drive improvement. As pupil numbers decrease and budgets reduce there will be even more pressure on reduced staffing levels to deliver the full curriculum. Any school that has required at least amber support for four out of the last five years and in a school of this size will find it difficult to deliver the breath of the current statutory curriculum.</p>	4	10%

26	Educational disadvantages for all pupils involved, as they will be taught in larger classes with less personalised learning programmes.	Teachers must set a personalised programme for each learner in their class regardless of size, and this is usually delivered with the support of teaching assistants. It is advantageous to have children of the same ability/age in a class rather than a large spread of ages in a smaller class without sufficient teaching assistant support.	2	5%
	Clydach Primary School			
27	Class sizes will increase at Clydach (yet the Welsh Government are providing £31m to try to reduce class sizes). This will have a negative impact on Clydach pupils. Objectors suggest that Clydach already struggles to provide SEN support for learners in class and that adding more children will cause more disruption. Objectors also suggest that Clydach already does not have enough reading books or tablets for all children in the class.	The maximum number of pupils in any year group in Craigcefnparc Primary that would transfer to Clydach Primary School is 7. Most classes will be able to absorb the number of learners from Craigcefnparc but there could be the need for some restructuring of classes. Foundation Phase classes cannot legally have more than 30 learners (subject to some permitted exceptions) and the aim is for Key Stage 2 classes to also be a maximum of 30. The Welsh Government grant has only been provided for a small number of schools that meet a limited set of criteria, including high levels of free school meals and/or learners from ethnic minority backgrounds. All schools are allocated funding to support learners with special educational needs and the local authority is not aware of any concerns around support for learners at Clydach Primary School. It is usual practice for learners within a class to share tablets and other resources. Clydach Primary School currently has an IT suite but their intention is to purchase additional mobile devices for the classrooms, as is the case in most other schools now that technology is progressing, releasing the IT suite room so that it is available as additional classroom space if required.	8	21%

28	Clydach Primary School have staggered their finish times between the two sites and children therefore have less education.	Children continue to have the same hours of education but they are provided at a different time during the day. This change commenced in September 2018 and has been successful in easing the traffic around the site at the end of the school day.	1	3%
29	There are less after school clubs at Clydach. Craigechnparc has more clubs than has been quoted. Sessions at Clydach are often cancelled at short notice.	Clydach Primary runs various after school clubs for ad hoc programmes for 6 weeks at a time. Early birds club is available from 7:50 am each day. Discussion can take place on the types and number of clubs provided. Sessions are rarely cancelled and as much notice as possible would be given.	4	10%
30	During consultation there was a question from Clydach children asking if Craigechnparc children would be well behaved. The reply was that there could be naughty children in any school. This was not reassuring for pupils in a school who would be aware of existing bullying.	This is not the case at Clydach. The school is pro-active in teaching learners about the impact of bullying as a preventative measure, and this has included talks from the community police (who attend for various other topics as well). Estyn reported that- "Nearly all pupils enjoy coming to school and feel safe. The school council is an effective forum for the pupil voice, for example in introducing anti-bullying ambassadors. Nearly all pupils are polite and well behaved. They demonstrate good behaviour during lessons, in assemblies and in the playground. Pupils show compassion for others, raising funds for a number of charities". Headteachers' termly reports to governors must contain reference to any bullying in a school. The headteacher at Clydach Primary School reported to governors on 26 March 2018 that "behaviour was excellent and there were no issues at all" and it was noted that the school was currently working on an understanding of what "bullying" actually is.	1	3%

31	<p>There is no surplus space in Clydach. Concern that children living in Clydach will not be able to attend Clydach Primary School in future. The school capacity has nearly been reached. Parents could have children at more than one school.</p>	<p>The published capacity for Clydach is based on the rooms currently being used as classrooms. There are other areas that can be brought back into classroom use if required, although the majority of Craigcefnparc learners could be admitted into existing classes, as there would be a maximum of 7 learners in any year group. It should be noted that the local authority has reviewed the capacity at Clydach recently as the school felt that they could potentially accommodate all of the Clydach learners on one of their sites, and this highlights the level of surplus capacity at the school. There is no reason why parents should have children in more than one primary school.</p>	9	23%
32	<p>Increasing the capacity and Admission Number at Clydach will mean that rooms used for extra-curricular activities, such as the IT suite, will be taken away to turn the rooms into classrooms. The hall would need to accommodate more learners. The local authority must consult on admission numbers two years in advance.</p>	<p>Most schools have moved away from having an IT suite as technology has advanced and mobile devices can be used in the classroom. Clydach Primary School are already considering this as a change of provision. As the number of learners that would transfer are small (a maximum of 7 per year group) there will be a limited requirement for additional rooms to be used as classrooms. Clydach Primary School has a hall at each site and the small number of additional pupils can be accommodated. A Statutory Notice overwrites the consultation process on admissions and admission numbers.</p>	4	10%
33	<p>There are not a wider range of facilities at Clydach Primary School to offer greater flexibility in covering all areas of the curriculum and greater access to resources and staffing.</p>	<p>As Clydach is a larger school, it will have more resources and more staff with different areas of expertise, as well as the ability to support each other and provide cover.</p>	1	3%
34	<p>Other than Clydach, all other primary schools in this area are full or oversubscribed, giving parents no real choice.</p>	<p>There is space in some of the year groups in both Craigfelen and Glais Primary Schools but some of the year groups are already at Admission Number.</p>	6	15%

35	The Local Development Plan has potential for new dwellings in the area (between 70 and 167 dwellings were quoted in various responses). This will inevitably increase the number of pupils needing school places.	For the Clydach ward, the council's figures currently forecast that around 200 additional housing units will be built by the end of 2025, a 6% increase on existing stock, below the average increase across the county (+11%). Council projections would estimate under 40 additional primary aged pupils from 200 houses and this does not take into account any 'recycling' within the area or any stock that would then become vacant. Parents also have the choice of faith and Welsh-medium in Clydach, as well as English-medium school places. However, there are no firm plans for any actual build as yet.	9	23%
36	The location and environment in which Craigcefnparc Primary is situated is far less restricted than Clydach Primary and is in a much more natural environment, with pupils often having lessons in the forest school area, which benefits their education, health and wellbeing. This cannot be offered at Clydach Primary so it would not provide an experience that is at least as good.	Outdoor learning is a requirement in the Foundation Phase. Learners at Clydach Primary have a stimulating outdoor area on the school site and also take trips to the canal, Coed Gwillim Parc, Forge Fach community centre's outdoor area, Manor Park etc. The council is working with the acting headteacher at Craigcefnparc Primary School regarding access to and the use of the nearby forest area to ensure that the relevant insurance and risk assessments are in place, and that the required authority has been gained to access the land as it is privately owned.	7	18%
	Financial			
37	There is no financial saving to be made. There will be additional costs for transport, and this money should be spent on keeping the school open instead.	This proposal has not been made for financial reasons. It is about the sustainability of educational provision for the children of Craigcefnparc.	12	31%
38	The proposal has been made for financial saving reasons. Although the council states that the proposal has not been made for financial reasons there is detailed financial analysis in the consultation documents.	There is no financial saving to the council from this proposal. The proposal is based on educational reasons. The School Organisation Code and the Cabinet process of the Council requires financial information to be provided for every proposal and report.	5	13%

39	<p>If Craigcefnparc school is not financially sustainable then the funding formula should be changed to allocate more funding. The Governing Body of Craigcefnparc refute that the school is not sustainable in the longer term. Another objector felt that as so much financial support has been given to the school in recent years that it would not make financial sense to close the school at this stage.</p>	<p>Giving more money to Craigcefnparc Primary School would mean taking money from other schools and learners in Swansea, as there is no additional funding available. The council has a duty to share resources as fairly as possible for the benefit of all learners. The school has only set a balanced budget in the current financial year with additional financial support from the council (£15k initially and then a further £10k when they were still unable to balance their budget) while the consultation process is ongoing. A balanced budget was still only possible because the acting headteacher had moved on to another school and the position has been filled by the deputy headteacher from September 2018 (reducing the teaching staffing by one person overall). The school is unable to fund a caretaker or any supply cover for staff, and annual maintenance of the school buildings is extremely limited. The council is unable to provide this additional £25k every year and it is predicted that the school will have to declare a staff redundancy to balance their budget for the 2019-2020 financial year. This will lead to an increased adult to child ratio at the school.</p>	2	5%
40	<p>Council Tax should be reduced if the school is removed from this high-paying area (compared to funding £1,584.71 more per pupil than the average for Swansea).</p>	<p>Council Tax is not based on access to a school and is mainly related to value of property.</p>	1	3%
41	<p>The consultation paper should have given an accurate figure for the toilet refurbishment.</p>	<p>The figure is based on an initial local authority surveyor's budget estimate. As this is only a proposal we would not seek further quotes until we are sure that work needs to progress.</p>	1	3%

42	If backlog maintenance of the school building is irrelevant why is it mentioned? The condition ranking is the same at Clydach Primary School. What is the nature of the backlog maintenance?	This is only backing information which is expected to be included within a consultation document and has no bearing on the proposal to consult to close. The current base line figure was established in 2007, the date when the initial condition surveys were commissioned. All schools were allocated a condition category of A – D to reflect the level of maintenance required to bring them to a certain standard. The backlog maintenance figures were based on bringing all C and D rated elements back to an A/B rating, and included all professional fees and associated costs e.g. building control fees. The figures also allowed for a logical refurbishment and did not just consider individual elements. Therefore, for example in a toilet block, the value would likely reflect the cost of an overall refurbishment if appropriate, rather than just repairing and replacing the life expired elements. Each financial year the base-line figures have been adjusted in accordance with the appropriate Building Maintenance Cost Indices, to ensure figures reflected the current industry costs, and also to reflect works undertaken for example.	2	5%
43	The council should invest in schools instead of risky capital projects in the city centre.	Capital and revenue budgets are from different funding sources.	1	3%
44	New staffing costs have not been included in the financial projection or the revised cost per pupil per year.	It is difficult to predict staffing requirements at a consultation stage as parents may not all choose to take learners to Clydach primary school if the proposal to close was progressed. Staffing requirements at the new school would depend on the number of learners attending from Craigcefnparc and would be at the discretion of the headteacher and governing body at that school and not the local authority.	1	3%
	Impact on Children and Staff			

45	It is stressful for children to move schools.	The council would work with learners and would introduce a transition plan where they would visit the new school in advance of any move, as they do when they transition to secondary school.	3	8%
46	It is claimed that staff will be redeployed but as it is the governors at Clydach that will make that decision how can assurance be given?	The local authority would work with Clydach Primary School to assess additional staffing requirements and if staff can be suitably redeployed to that school as, it would assist learners with their transition to see familiar faces. If staff are unable to be placed at Clydach they can consider redeployment to other schools or service areas in the council. Some staff may wish to consider early retirement.	1	3%
47	Saying the school is poor is damning for staff already in a vulnerable position.	The staff at the school are good. It is the overall school's ability to self-improve and face the new curriculum and increasing demands that is poor.	2	5%
	Alternative Options			
48	Change the catchment area so that some of the Clydach area is taken into Craigcefnparc.	Changing a catchment area does not mean that pupil numbers would increase at Craigcefnparc Primary School. Parents can choose where they send their children and, as there would be capacity at Clydach Primary for learners, the children would be likely to remain in Clydach.	1	3%

49	<p>Federation needs further investigation. It had not been considered fully before consulting on the closure proposal. Clydach governors have only recently discussed federation, despite the council stating that discussions had taken place. The council cannot provide evidence of federation discussions with local schools under FOI. Federation of Clydach and Craigcefnparc schools is preferable to closure. The headteacher of Clydach should not be involved in the federation vote. Emails and letters sent from Craigcefnparc governors to Clydach governors have not been received by them. Craigcefnparc governors should have been invited to the presentation on federation at the Clydach governors' meeting.</p>	<p>The authority has fully considered federation as an option before consultation on the closure of Craigcefnparc but did not use its powers to 'force' federation, as it did not consider that this would be the best option. Under a federation each school continues to receive its own budget share and has applications from parents to each school. The main difference is that the federation has one governing body and the potential to have one headteacher, usually with backfill for non-teaching deputy headteachers at each site. The local authority has offered to discuss federation with many governing bodies in Swansea but it has not been possible to identify another school that wishes to federate with Craigcefnparc Primary School. Clydach Primary governors asked the local authority to attend their governing body meeting in January to explain how federation works. They then officially voted that they would not wish to pursue federation with Craigcefnparc. The headteacher of Clydach Primary School was entitled to vote on this matter. It is up to the governors of Clydach Primary School who they invite to their meetings but other schools who have discussed federation have also carried this out without others in attendance to allow for open and confidential discussions to take place. Other school governing bodies in the area have also discussed federation as an option but have chosen not to pursue this with Craigcefnparc. It is for Craigcefnparc governors to follow up on emails that they have sent to other schools/governors.</p>	14	36%
50	<p>Federation with Glais would address numbers on roll as pupils from Glais could be directed to Craigcefnparc.</p>	<p>This is not how Federation works. Under federation schools continue to admit pupils as separate schools. Children cannot be directed to another school. Parents</p>	1	3%

		will continue to apply to the school of their choice until the Admission Number for that school is reached.		
51	Open a Welsh language unit and relocate Felindre pupils.	There is a separate proposal to relocate Felindre pupils into a new build school for YGG Tan-y-lan. Pupils requesting Welsh-language provision from Craigcefnparc go to YGG Gellionnen in Clydach.	1	3%
	Process			
52	Objections are not being taken seriously. There has been predetermination and bias.	The consultation process has been carried out in accordance with the School Organisation Code and there has not been any predetermination.	6	15%
53	The Estyn report was included in the consultation papers but the follow up monitoring report, showing strong progress, was not.	The School Organisation Code only requires the last Estyn inspection report to be included.	1	3%
54	The ERW Challenge Advisor was not consulted during the process but this individual has the knowledge and understanding of the school to be best placed to give information on educational standards.	The Challenge Adviser for the school is fully aware of the closure proposal and has been fully involved in the categorisation process and case for proposed closure. She attended nearly all of the consultation meetings at Craigcefnparc and Clydach during the process. She engaged with the governors, parents and the wider community during the consultation meetings and responded to questions from these stakeholders. The Challenge Adviser notes that no governors attended SV1 (a required meeting that takes place with all schools to discuss performance). At a governor meeting they queried with the Challenge Adviser how to dispute their categorisation as they felt that the school was categorised as amber to support the authority's case for closure; however, the disagreement was never received.	1	3%
55	Challenge that the Equality Impact Assessment is flawed.	The local authority does not agree with this statement.	1	3%
56	Only councillors supporting the closure were allowed to attend scrutiny meetings. Objectors had asked for their own consultant to	There is a formal membership of scrutiny meetings, including statutory co-opted members for which the only vacancy is for a faith	2	5%

	sit on the scrutiny committee but this was refused.	school representative. If anyone on the panel declares an interest they can choose not to take part, based on legal advice.		
57	There is a covenant stating that the school is for the farming community and their children. If the school is closed the land will revert to the Somerset Trust.	Deeds have been checked by the council's solicitor and there is nothing that would prevent disposal. The proposal has not been made for financial reasons and is about the sustainability of educational provision for the children of Craigeffnparc.	4	10%
58	Statements made by parents about why they had taken their children from the school had been ignored when Cabinet decided to go to Statutory Notice.	All consultation responses were shared in full to all Cabinet members in advance of their meeting.	1	3%
59	Not considering the Wellbeing of Future Generations Act (does not take into account health of children and adults if they can no longer walk to school; removes equal access to education; prevents access to education in our own community; is only looking at present pupil numbers and not the longer term when numbers can rise)	Swansea Council acts in accordance with the Well-being of Future Generations (Wales) in all it does. Sustainable development has been a central organising principle since 2012 and each year the Council aims to further embed and build on sustainable practice. The focus is on integrating behaviour change so that the five ways of working and maximisation of each of the national well-being goals is implicit in how services operate as a whole Council. Integration - Our Corporate Plan 'Delivering a Sustainable and Successful Swansea' sets out how the organisation applies the five ways of working and maximises contribution to each of the national well-being goals. We believe this decision aligns with not only the Well-being Objective 'Improving Education and Skills' but other well-being objectives. Swansea's Local Well-being Plan prioritises Local Well-being Objectives for collective action. The achievement of Local Well-being Objectives are not threatened by this decision. As this body of evidence demonstrates wide ranging impacts across the well-being goals have been documented. Swansea	15	38%

		<p>Council considers these issues not only individually by addressing specific concerns in isolation but by considering informally the collective impact on well-being and how issues raised can impact on wider well-being. This indirectly considers the collective impact on the seven well-being goals as a set.</p> <p>Long term - The decision takes account not only of the well-being of learners currently at Craigcefnparc but the well-being of all Swansea's learners today and in the future. This includes taking account of long-term trends that inform the development of the Council's policies and strategies.</p> <p>Prevention - The Council has acted having identified adverse impacts on future learning and sustainability. This decision aims to stop or prevent problems getting worse.</p> <p>Collaboration - The consideration of impacts on social, economic, environmental and cultural well-being has been informed both by the expertise of services across our organisation and from external organisations such as the Audit Commission. Collaborative opportunities e.g. federalisation were explored as part</p> <p>Involvement- The consultation document demonstrates considerable involvement activities with those with an interest or who were affected by the proposal in a way that reflects the diversity of the population</p>		
60	<p>Inadequate consultation with children. Consultation paper difficult for children to understand, particularly nursery. Consultation meetings were only with a few children. Unclear how children at Clydach were consulted.</p>	<p>The School Organisation Code requires consultation meetings with the school council of affected schools and this has taken place at Craigcefnparc and Clydach schools. The school council members represent their peers and had discussed the proposal with their classmates prior to the meeting with local authority officers. Consultation papers have been</p>	6	15%

		issued to all learners in both schools.		
61	The proposal does not identify clearly enough the impact of the proposal on pupils with special educational needs.	The Equality Impact Assessment attached to the proposal covers special educational needs. All schools must address the needs of all of their learners and schools are funded to support learners with special needs.	2	5%
62	The Minister for Education has a clear agenda to protect small and rural schools, given their importance to those local communities.	The Welsh Government have published their new School Organisation Code and have not classified Craigeffnparc as a rural school. The Code change requires an additional step to take place before the commencement of consultations where alternatives to closure are considered. The council had acted within the spirit of the new Code and had considered alternatives to closure.	1	3%
63	No visit or consultation with the community took place to produce the Community Impact Assessment. The Community Impact Assessment only considers use of the school buildings. There was no Community Impact Assessment for Clydach.	The required content of the Community Impact Assessment is laid out in the School Organisation Code. The assessment needs to consider what the school offers to the community in respect of community access (Craigeffnparc school does not offer community access other than the parent and toddler group) and out-of-hours provision for learners. A well-used community centre services the village of Craigeffnparc. The assessment also covered community use of the Clydach school building.	8	21%
64	No consultation was attempted with the school to secure the Small and Rural Schools Grant. Why isn't Craigeffnparc on the list of small and rural schools produced by the Welsh Government? The bids that the working party wish to submit could have supported the school remaining open. Why was the first bid to the Welsh Government rejected?	The local authority is required to submit bids for this grant as it is a local authority grant and not a school grant. As noted above, Craigeffnparc Primary School is not on the Welsh Government's list of rural schools. The criteria for submitting bids is limited and the Welsh Government did not feel that the local authority bid for FY2017-2018 met this criteria, although the local authority would still argue the	4	10%

		<p>case. The local authority was successful in bidding for a feasibility project in FY2018-2019 so that a full business case can be worked up with the governing body with a view to submitting bids for the grant for FY2019-2020. Authority officers have also offered to support the working party in their bid to establish wraparound at the school, although this offer has only recently been taken up. It should be noted that the local authority were successful in bidding for this grant in FY2018-2019 to provide supply cover to assist staff at Craigcefnparc to attend training and professional development.</p>		
65	<p>No formal meetings were held for the community, only drop-in sessions which put off some residents from attending. The drop-in session style should not have been piloted in Swansea for a school closure proposal. The scribbled notes would not have been able to be shared in any meaningful way.</p>	<p>The School Organisation Code does not require that meetings are held. Many local authorities hold drop-in sessions. All notes taken were transcribed in full for Cabinet members to view and points raised were included in the Consultation Report.</p>	3	8%
66	<p>Questions have not been answered during the consultation period. FOIs have had to be submitted but answers were not fully provided or timely. Questions were not answered at the drop-in sessions, they were just recorded.</p>	<p>The drop-in sessions allowed the views of the public to be recorded. Answers were provided where they were known. All questions raised in the formal consultation period have been answered in the Consultation Report that has been widely shared. All FOIs have been answered. If those requesting information under FOI are not happy with the response given there is a clearly identified process to follow but there has been no follow up process evoked.</p>	1	3%
67	<p>Cabinet members should have visited Craigcefnparc and Clydach before voting. Cabinet members should have met with the community.</p>	<p>This is not required by the School Organisation Code; however, Cabinet members are familiar with the area and the schools. Educational and other statistics have been presented in the Cabinet reports and consultation paper.</p>	9	23%
68	<p>The distance between the schools in the consultation paper has been challenged.</p>	<p>"About a mile" is a quote from Estyn and is to give a background to those not from the area on the</p>	1	3%

		rough location of the school in relation to the town of Clydach. The schools are 1.8 miles apart by road.		
69	The lack of a permanent headteacher should not be used as a reason to close the school.	The governing body have been unable to appoint another headteacher while the substantive headteacher that they appointed was still in post (but not in work), as a school cannot employ two headteachers.	1	3%
70	One objector felt that an officer of the council had a [tenuous] link with the village and should not have been involved in the process.	The Director of Education is fully satisfied that officers involved in the process have no interest that should have been declared.	1	3%

All objections have been made available in full for Cabinet to view.

Equality Impact Assessment (EIA) Report

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

Please refer to the ‘EIA Report Form Guidance’ while completing this form. If you need further support please contact acesstoservices@swansea.gov.uk.

Where do you work?
Service Area: Education
Directorate: People

(a) This EIA is being completed for a:

Service/ Function	Policy/ Procedure	Project	Strategy	Plan	Proposal
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(b) Please name and describe here:

Closure of Craigefnparc Primary School with effect from 31 August 2019

The recommendation of officers is that Craigefnparc Primary School is unsustainable with falling numbers on roll, lack of permanent leadership, and education provision that has been variable over the past few years. In addition, the school is also having difficulty setting a balanced budget and future projections are for increased financial pressures. The local authority has intervened to provide considerable support and challenge to ensure necessary improvements were made in the quality of provision and in the quality of leadership. The local authority cannot sustain this level of support long term. Consequently there are several specific reasons why this proposal has been made on educational grounds:

- Clydach Primary School can offer a wider range of facilities on a less restricted site, offering a greater flexibility in covering all areas of the curriculum and greater access to resources and staffing.
- Current and future anticipated pupil needs at Craigefnparc Primary School can be appropriately met at Clydach Primary School.
- The size of Craigefnparc Primary School raises the concern that the quality of educational provision may not be sustainable in the future.
- The larger team of staff at Clydach Primary School can provide a broader range of expertise in areas of the curriculum and in terms of leading whole school initiatives. It can provide staff with more opportunities to develop their skills and can enable the best use to be made of staff expertise.
- A larger school has more flexibility with its budget and can have access to a wider range of resources and staffing.
- Whilst 74.1% of learners on roll at Craigefnparc Primary School are from the catchment area, only 45.5% of primary school age pupils living within the school’s catchment area attended Craigefnparc Primary School at January 2018.

Pupil numbers at Craigefnparc Primary School have decreased over a number of years and are not projected to increase to a sustainable level. The Council’s Cabinet decided to consult on a proposal to close Craigefnparc Primary School. The consultation was on the basis that, if agreed, the school would close with effect from 31 August 2019. The current catchment area for Craigefnparc would be transferred to Clydach Primary School, although parents could apply for a place at a preferred school and applications would be considered in line with admission

arrangements. Transport would be provided for eligible pupils to Clydach Primary School as per the Council's Home to School Transport Policy.

A report was presented to Cabinet to consider all the points raised during the consultation and a decision taken to proceed to Statutory Notice. A report has now been prepared for Cabinet to consider the objections received during this notice period.

During this time the Craigeffnparc governing body also submitted a document in response to the Equality Impact Assessment. This submission has been noted and discussed as we review the document further. Contrary to the governing body's view we do not accept that this EIA is bias or factually incorrect. For transparency this submission is included as an appendix to the EIA.

(c) It was initially screened for relevance to Equality and Diversity on: 15/05//2018

(d) It was found to be relevant to...

Children/young people (0-18).....	<input checked="" type="checkbox"/>	Sexual orientation.....	<input type="checkbox"/>
Older people (50+)	<input checked="" type="checkbox"/>	Gender reassignment	<input type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	Welsh language.....	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Poverty/social exclusion	<input checked="" type="checkbox"/>
Race (including refugees)	<input checked="" type="checkbox"/>	Carers (including young carers).....	<input type="checkbox"/>
Asylum seekers.....	<input type="checkbox"/>	Community cohesion	<input checked="" type="checkbox"/>
Gypsies & Travellers.....	<input type="checkbox"/>	Marriage & civil partnership	<input type="checkbox"/>
Religion or (non-)belief.....	<input type="checkbox"/>	Pregnancy and maternity.....	<input type="checkbox"/>
Sex.....	<input checked="" type="checkbox"/>		

(e) Lead Officer

Name: Kelly Small

Job title: Head of Funding and Information Unit

Date: 15/05/2018

(f) Approved by Head of Service

Name: Brian Roles

Date: 03/09/2018

UPDATED FOLLOWING THE CONSULTATION ON 29th November 2018.
 UPDATED FOLLOWING THE STATUTORY NOTICE PERIOD ON 23rd February 2019.

Section 1 – Aims (See guidance):

Briefly describe the aims of the initiative:

What are the aims?

The main aim of this proposal is to provide a better quality of education for learners at Craigcefnparc Primary School. The recommendation of officers is that Craigcefnparc Primary School is unsustainable with falling numbers on roll, lack of permanent leadership, and education provision that has been variable over the past few years. In addition, the school is also having difficulty setting a balanced budget and future projections are for increased financial pressures. The local authority has intervened to provide considerable support and challenge to ensure necessary improvements were made in the quality of provision and in the quality of leadership. The local authority cannot sustain this level of support long term.

This recommendation supports the Councils vision that every child has access to high quality teaching that helps them to make the most of their talents. It's also in line with the QEd vision that budgets should be spent on pupils and not wasted on empty spaces.

Who has responsibility?

The overall responsibility would be with Swansea Council.

Who are the stakeholders?

Each stakeholder group requires a specific method of communication to promote key messages during the project. A broad approach for communications methods is outlined below. It draws on corporate methods of communicating to staff in general as well as some established meeting structures within the project.

Audience	Methods
Parents	Letters, media, social media, website
Governors	Face to face briefing, emails
Head and Management Team	Face to face briefing, emails,
Pupils	Face to face school visits, social media
Clydach Primary School Headteacher	Face to face, letter, email, newsletter
Clydach Primary School Staff	Face to face, letter, email, newsletter
Clydach Primary School Learners	Face to face, letter, email, newsletter
Clydach Primary School Governing Body	Face to face, letter, email, newsletter
Other neighbouring schools' headteachers	Face to face, letter, email, newsletter
Other neighbouring schools' governing bodies	Face to face, letter, email, newsletter
Other neighbouring schools' parents and learners	Letter, website, parents' evenings, local media, social media
CMT	Face to face briefing, newsletter, email
Cabinet	Face to face briefing, newsletter, email
Group Leaders	Face to face briefing, newsletter, email
Ward Members	Email, phone call
Trade Unions	Face to face briefing, email
Evening Post	Face to face briefing, press release
Welsh Government	Letter, local media, email
Estyn	email
AMs/MPs	letter, email
School staff	Face to face, letter, Newsletter, media,

		social media, website
Swansea Bay Radio, Wave/Swansea Sound, BBC, ITV, Western Mail, BBC Cymru, Golwg 360		Press release
Education SLB/EDSLT/DMT		email, newsletter, face to face
O and S Chairs and V Chairs		Email, letter
Catering and cleaning staff		letter, face to face
Community groups		Letter and liaison with Community Regen, social media, website
All Council staff		Staffnet, website, social media
Swansea residents		Media, website, social media
Local businesses		Media, letters, website, social media

Section 2 - Information about Service Users (See guidance):

Please tick which areas you have information on, in terms of service users:

- | | | | |
|-----------------------------------|-------------------------------------|--------------------------------------|-------------------------------------|
| Children/young people (0-18)..... | <input checked="" type="checkbox"/> | Sexual orientation..... | <input type="checkbox"/> |
| Older people (50+) | <input checked="" type="checkbox"/> | Gender reassignment | <input type="checkbox"/> |
| Any other age group | <input checked="" type="checkbox"/> | Welsh language..... | <input checked="" type="checkbox"/> |
| Disability | <input checked="" type="checkbox"/> | Poverty/social exclusion | <input checked="" type="checkbox"/> |
| Race (including refugees) | <input checked="" type="checkbox"/> | Carers (including young carers)..... | <input type="checkbox"/> |
| Asylum seekers..... | <input type="checkbox"/> | Community cohesion | <input checked="" type="checkbox"/> |
| Gypsies & Travellers..... | <input checked="" type="checkbox"/> | Marriage & civil partnership | <input type="checkbox"/> |
| Religion or (non-)belief..... | <input type="checkbox"/> | Pregnancy and maternity..... | <input type="checkbox"/> |
| Sex..... | <input checked="" type="checkbox"/> | | |

Please provide a snapshot of the information you hold in relation to the protected groups above:

The following pupil information is collected annually as part of the pupil census. This information is from the January 2018 PLASC:

Craigcefnparc Primary School Pupils

	2015-2016	2016-2017	2017-2018
Percentage of total pupils on roll living in areas classed in Welsh Index of Multiple Deprivation (WIMD) as being in the most deprived 30% of all areas	0.0%	1.6%	5.4%
Percentage claiming Free School Meals	20.0%	13.0%	15.7%
Percentage with Special Educational Needs (SEN)	27.4%	27.4%	23.2%

Need	School Action	School Action Plus	Statement	Total
<i>Attention Deficit Hyperactivity Disorder</i>	0	2	0	2
<i>Autistic Spectrum Disorders</i>	0	1	0	1
<i>Behavioural, Emotional & Social Difficulties</i>	0	2	0	2
<i>Dyscalculia</i>	0	0	0	0
<i>Dyslexia</i>	0	0	0	0
<i>Dyspraxia</i>	0	0	0	0
<i>General Learning Difficulties</i>	4	1	0	5
<i>Hearing Impairment</i>	0	1	0	1
<i>Moderate Learning Difficulties</i>	0	1	0	1
<i>Multi-Sensory Impairment</i>	0	0	0	0
<i>Physical and Medical Difficulties</i>	0	0	0	0
<i>Profound & Multiple Learning Difficulties</i>	0	0	0	0
<i>Severe Learning Difficulties</i>	0	0	0	0
<i>Speech, Language and Communication Difficulties</i>	2	1	0	3
<i>Visual Impairment</i>	0	0	0	0
Total	6	9	0	15

None of the learners in Craigcefnparc Primary Schools currently have a Statement of Educational Need.

	Stage A-C	Stage A-D	Stage A-E
Percentage with English as an Additional Language (EAL)	0%	0%	3.6%

Ethnic Background	Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Non White British	0.0%	0.0%	0.0%	0.0%	12.5%	0.0%	12.5%

Clydach Primary School Pupils

	2015-2016	2016-2017	2017-2018
Percentage of total pupils on roll living in areas classed in Welsh Index of Multiple Deprivation (WIMD) as being in the most deprived 30% of all areas	10.6%	10.7%	8.8%
Percentage claiming Free School Meals	26.2%	25.7%	27.5%
Percentage with Special Educational Needs (SEN)	23.8%	24.9%	25.0%

Need	School Action	School Action Plus	Statement	Total
<i>Attention Deficit Hyperactivity Disorder</i>	0	1	0	1
<i>Autistic Spectrum Disorders</i>	0	0	3	3
<i>Behavioural, Emotional & Social Difficulties</i>	1	7	0	8
<i>Dyscalculia</i>	0	0	0	0
<i>Dyslexia</i>	0	0	0	0
<i>Dyspraxia</i>	0	0	0	0
<i>General Learning Difficulties</i>	19	10	0	29
<i>Hearing Impairment</i>	0	1	0	1
<i>Moderate Learning Difficulties</i>	19	4	2	25
<i>Multi-Sensory Impairment</i>	0	0	0	0
<i>Physical and Medical Difficulties</i>	1	2	0	3
<i>Profound & Multiple Learning Difficulties</i>	0	0	0	0
<i>Severe Learning Difficulties</i>	0	0	1	1
<i>Speech, Language and Communication Difficulties</i>	1	8	3	12
<i>Visual Impairment</i>	0	0	0	0
Total	41	33	9	83

There are currently 9 pupils at Clydach Primary School who have a Statement of Educational Need.

	Stage A-C	Stage A-D	Stage A-E
Percentage with English as an Additional Language (EAL)	3.7%	3.7%	4.1%

Ethnic Background	Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Non White British	9.1%	10.5%	11.4%	12.0%	6.9%	10.3%	7.4%

Craigcefnparc Primary School Staff

The vast majority of staff (teaching and non-teaching) at the school are female with the age profile ranging from early 30s to early 60s. No further information is held in relation to the protected characteristics of staff. There are 4 full-time teachers (including the headteacher) with one of these being male. There are 2 female teaching assistants (one at 27.5 hours per week and the other at 25 hours per week), 1 female part-time admin officer, 1 female part-time cook and 1 female part-time cleaner.

Community Use

Craigcefnparc Primary School currently provide a breakfast club and an after school club provision for learners covering First Aid, Dancing, Cross Country, Netball, Football, Photography, Athletics, Cooking, Fit Club, Arts and Crafts, Coding, Gardening and ICT. These clubs are run alternatively throughout the academic year.

Craigcefnparc Primary School currently run a parent and toddler group.

Further details in this area have been published in the Community Impact Assessment. This has been published here: <https://www.swansea.gov.uk/craigcefnparcconsultation>.

The key findings of this assessment are as follows:

Impact Assessment – Craigcefnparc Primary

Community Aspect	Current	Impact Assessment
Community Services Provided by the school (e.g. after school clubs, community library etc.)	<i>Craigcefnparc Primary currently provide a breakfast club and an after school club provision for learners covering First Aid, Dancing, Cross Country, Netball, Football, Photography, Athletics, Cooking, Fit Club, Arts and Crafts, Coding, Gardening and ICT. These clubs are run alternatively throughout the academic year.</i>	<i>Breakfast club provision is available at Clydach Primary and they also run an 'early bird' club (7:50am - 8:20am). There are a number of after school clubs for learners: Arts and Crafts, Eco, Film Making and also a private company run a Mad Science club. There are also a number of lunchtime clubs: Choir, Welsh and Athletics. The Local Authority will work with the schools on continued access for learners wishing to take part in out-of-school hours clubs, particularly less advantaged learners</i>
Facilities Accommodated by the School (e.g. youth club, play group etc.)	<i>Craigcefnparc Primary currently run a parent and toddler group.</i>	<i>There is no parent and toddler group at Clydach Primary, however Craigcefnparc has a Welfare Hall and it may be possible to run a baby and toddler group at this location.</i>

Establishing a multi-school site would not achieve the objectives of this proposal (see consultation paper). There is very limited use of the school out of school hours. The local authority will work with the school on access to out-of-school hours clubs.

Would alternatives to closure, such as clustering, collaboration or federation with other schools, be considered (taking account of the scope for use of ICT links between school sites)?

These alternatives would not achieve the objectives of the proposal (see consultation paper). There is very limited used of the school out of hours.

Have possibilities of making fuller use of the existing buildings as a community or an educational resource been explored (would it be feasible and economical to co-locate local services within the school to offset the costs of maintaining the school)

These alternatives would not achieve the objectives of the proposal (see consultation paper). There is very limited used of the school out of hours.

What is the overall effect of closure on the local community (including the loss of school based facilities which are used by the local community), particularly in rural areas or those receiving funding as part of regeneration activity?

There is very limited used of the school out of hours. There is no funding from regeneration activity for this school.

Any actions required, e.g. to fill information gaps?

•

Section 3 - Impact on Protected Characteristics (See guidance):

Please consider the possible impact on the different protected characteristics.

	Positive	Negative	Neutral	Needs further investigation
Children/young people (0-18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Older people (50+)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other age group	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race (including refugees)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Asylum seekers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gypsies & travellers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Welsh Language	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Poverty/social exclusion	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Community cohesion	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Thinking about your answers above, please explain in detail why this is the case.

(0-18) – Craigechnparc is an English-medium primary school. This proposal looks to close the school and move the pupils to Clydach Primary School. Although the change can be seen as negative in the first instance, we believe that based on favourable ESTYN inspection results, and the increased flexibility in delivering the curriculum that Clydach Primary could offer, that pupils would receive at least a similar, if not an improved education should this proposal go ahead. If the proposal was approved officers would work with both schools to ensure that the transition for learners and their families was planned and delivered with the best interests of the learner a main priority.

(Older People 50+/Any other age group) –there is the chance of some redundancies because of this proposal. The Council would recommend that any new staff posts required at Clydach Primary or other neighbouring schools due to increase in pupil numbers, be ‘ring-fenced’ to the staff of Craigechnparc Primary. However, this would be a decision for individual governing bodies.

(Disability) – The design, delivery and implementation of this proposal will take full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. Any proposal will be designed with this in mind. Craigechnparc and Clydach currently have a similar level of children who have special educational needs with both schools offering the right level of support for these pupils. There are currently no pupils from Craigechnparc with a Statement of Educational need however should there be a need for a Statement of Educational Need for any learner in the future that statement would set out the required support for that child and what the school needs to provide. Clydach Primary School currently delivers on such statements for some of its current learners.

(Welsh) – Craigechnparc is an English-medium primary school but the Welsh language plays a key role throughout the curriculum. This would continue to be the case at Clydach Primary School.

(Poverty/social exclusion) – There are low levels of deprivation in this area and therefore the impact on poverty/social exclusion is expected to be low. Due to the possible changes in catchment areas it is important to consider the impact this could have on learners and their families. During the consultation concerns were raised about the requirement to travel further to access the educational provision at Clydach Primary School with the home to school transport only providing a service for the beginning and end of the school day and not factoring in the desire to access wrap-around services as they currently do at Craigechnparc. The Council is responsible for transporting pupils for education. Parents/carers of our learners are responsible for getting their learners to and from any out of school activities such as breakfast club and after school club.

(Community Cohesion) – It is possible that the proposed closure could have a negative impact on the local community and due to the possible changes in catchment areas it is important to consider the impact this could have on learners and their families. The Council's Local Well-being Plan has an objective ‘To build Strong Communities with a sense of pride and belonging’. The definition of communities is not restricted to specific physical communities of any particular size but includes communities of interest too. The council's plans support the development of a new community which will be created at Clydach Primary School.

Arguably, this is an opportunity to be part of a more diverse community with potential benefits in terms of experiencing a wider range of cultures, languages and communities that can enrich pupils' experience. The most relevant of the 3 steps under the objective is ‘individuals are connected and feel a sense of belonging’ and, while this is true of a small

school community, it is also true of larger school communities which tend to benefit from greater intercultural opportunities.

(Sex) – Given that the majority of staff at the school are female it is clear that this proposal would have a disproportionate effect on this group.

The remaining protected characteristics (namely Race, Asylum Seekers, Gypsies and travellers, Religion, Sexual Orientation, Gender reassignment, Carers, Marriage and civil partnership, Pregnancy and maternity) have all been identified as ‘neutral’ above as we do not believe the proposal will have either a negative or a positive impact on them. However, this will continue to be monitored and reconsidered throughout the process.

Section 4 - Engagement: Please consider all of your engagement activities here, e.g. participation, consultation, involvement, co-productive approaches, etc.

What engagement has been undertaken to support your view? How did you ensure this was accessible to all?

Since announcing the small school review the Council has held a meeting with a working group to look at all options open to the school and its governing body. Following the Cabinet’s decision to consult on the closure of the school a full statutory consultation was undertaken between 5 September 2018 and 18 October 2018. This ensured that all stakeholders have had an opportunity to share their views. The responses to this consultation were then published and considered by the council’s Cabinet.

A decision was made to proceed to a statutory notice providing a further 28 day notice period for objections. These objections are now being reported back to Cabinet.

Consultation on the closure proposal took place between 5 September and 18 October 2018.

Consultation took place as is required in the Welsh Government’s School Organisation Code with the specified list of consultees, including:

- pupils, staff, governors and parents at Craigefnparc Primary School
- pupils, staff, governors and parents at Clydach Primary School (proposed as the new school for the Craigefnparc catchment area)
- Welsh ministers, AMs and MPs in the area, and local councillors
- Estyn
- Trade unions

Consultation meetings and drop-in sessions were held as follows:

Meeting for:	Venue	Date	Time	Attendance
Learners (School Council)	Craigefnparc School	18/09/18	14:30-15:30	12
Staff	Craigefnparc School	18/09/18	15:30-16:15	7
Governors	Craigefnparc School	18/09/18	16:15-17:00	6
Drop-in for parents/public	Craigefnparc School Hall	18/09/18	17:00-19:00	38
Drop-in for parents/public	Craigefnparc Community Hall	20/09/18	11:00-14:00	16
Drop-in for	Craigefnparc	20/09/18	14:00-	17

parents/public	Community Hall		16:00	
Learners (School Council)	Clydach Primary School	24/09/18	14:30-15:30	10
Staff	Clydach Primary School	24/09/18	15:30-16:15	19
Governors	Clydach Primary School	24/09/18	16:15-17:00	5
Drop-in for parents/public	Clydach Primary School	24/09/18	17:00-19:00	16

An additional drop-in session was requested by objectors and this was arranged at the Craigcefnparc Community Hall for 11 October 2018 from 17:00 to 19:00 and 31 people attended.

39 written objections were received (one of these being after the end of the objection period).

What did your engagement activities tell you? What feedback have you received?

The text in *italics* below is a direct copy of text received by respondents during the consultation

Support for the School: *Objectors feel the council were too slow to provide support and bring about leadership improvements which have contributed to a drop in pupil numbers, and that the acting headteachers are bringing about change to improve the school and should be given time to continue that work. Objectors were confident that pupil numbers would increase again if the closure threat were removed, particularly as there were leadership improvements. The local authority has supported Craigcefnparc Primary School in their school improvement journey by identifying a quality acting headteacher from another school and funding this post for some time. The low pupil numbers in the school mean that the budget available to the school is also low and the current acting headteacher has to work for at least two days a week in the classroom, having the least non-contact time of any headteacher in Swansea. This will no doubt impact on the school's ability to continue to improve standards and to prepare for the new curriculum. Even if learners did return to the school there are not enough births in the whole of the Mawr ward to make the school sustainable. There have only been three admission applications to Reception for September 2019 by the closing date of 30 November 2018.*

School standards: *Previous poor standards highlighted by Estyn had been resolved after much support from the local authority and by the acting headteachers that had been appointed. The new governing body were also active in school improvement and the request from objectors was to give the school a chance to continue to improve the educational provision for learners at the school. The local authority recognise that Estyn have been satisfied that previous concerns are being addressed and that the school has moved from a 'red' to a 'yellow' category of support from the local authority. However a continued decline in pupil numbers and the projected budget pressures for coming years will have an impact. The school is unable to fund the supply staff costs needed to release staff for training and this will be vital to prepare for the new curriculum. Also the acting headteacher is restricted to the school site in the main due to teaching commitments and leadership requirements and therefore is unable to attend professional development opportunities.*

Transport: *Learners from Craigcefnparc would have to be transported to Clydach Primary School, as there was no available walking route. Transport is only provided for learners of statutory school age for the start and end of the school day and*

therefore would not be provided for nursery learners or those wishing to access breakfast club or any after school provision, disadvantaging the learners from the village. The council is responsible for transporting pupils for education. Parents are always responsible for getting their learners to and from any out of school activities such as breakfast club and after school club. There are many schools where nursery pupils are not transported to school; however if there are spare seats on the minibuses these can be purchased by parents.

Breadth of Curriculum: Confidence that the school could continue to provide the full curriculum to learners, despite the small number of staff at the school and budget pressures. Examples were given of the benefits of being in a small school, such as more opportunity to be involved in the School Council and sporting groups, and learning/social opportunities with children of different ages. Estyn reviewed school size and educational effectiveness in their December 2013 report and the following areas are highlighted from this report (the full report can be found at <https://www.estyn.gov.wales/thematic-reports/school-size-and-educational-effectiveness-december-2013>). The report shows that large primary schools tend to perform better than small and medium-sized schools. Curriculum provision is better in large primary schools. In small schools, there tends to be shortcomings in the provision of foundation subjects at key stage 2. These shortcomings differ from school to school, but are often linked to gaps in the expertise of staff. The quality of teaching is good or better in 80% of primary schools overall, but 72% of very small primary schools have teaching that is good or better. In these schools, there are three or more age groups in each class and teachers have to plan and deliver lessons that meet the needs of pupils from a wide age and ability range. Leadership and processes to improve quality are usually better developed in large primary schools. In small primary schools, many headteachers have a significant teaching responsibility that limits the time they can devote to leading and managing and they have fewer opportunities to evaluate standards and to drive improvement. Larger schools are likely to have more groups to join with a wider range to interest learners. Small schools struggle with team sports where a minimum numbers of players are required. Numbers at Craigcefnparc are predicted to fall further when the larger year groups in Key Stage 2 leave and this will limit team sports even further.

Grant bids: The governors had proposed grant bids for financial sustainability at the school, including establishing wrap-around childcare and a community IT hub at the school. These were not considered to be sufficiently developed to confidently deliver within the current financial year. However, Swansea Council has been able to support a bid for funding for feasibility studies in order to consider further bid submission in FY2019-2020.

School setting and facilities: Concern that learners would be leaving a rural setting to go to a congested town, and to a site that does not have the same green areas as they have at Craigcefnparc Primary School. A traffic assessment has been undertaken and traffic calming measures will be introduced around the Clydach site, regardless of the outcome of this proposal. Outdoor learning is a requirement in the Foundation Phase and learners at Clydach Primary have a stimulating outdoor area on the school site and also take trips to the canal, Coed Gwillim Parc, Forge Fach community centre's outdoor area/3G pitch, Manor Park etc.

Impact on rural community: Wider concern around the social and economic implications of removing the school from the rural community, particularly in light of the Wellbeing of Future Generations Act. The council's Local Well-being Plan has an objective 'To build Strong Communities with a sense of pride and belonging'. Objectors may consider this definition in broad terms (Page 21 of the LWP) but objections would not be directly in line with specific steps or actions. The objectives definition of communities is not restricted to specific physical communities of any particular size but includes communities of interest too. The council's plans support

the development of a new community which will be created at Clydach Primary School. Arguably, this is an opportunity to be part of a more diverse community with potential benefits in terms of experiencing a wider range of cultures, languages and communities that can enrich pupils' experience. The most relevant of the 3 steps under the objective is 'individuals are connected and feel a sense of belonging' and, while this is true of a small school community, it is also true of larger school communities which tend to benefit from greater intercultural opportunities.

Impact on staff: *The impact on staff at the school as they could be in a redundancy situation if they could not be redeployed elsewhere.* If the proposal proceeds to closure, the council would work with Clydach Primary School and any other school receiving pupils to request that governors consider ring-fencing any new posts for the staff at Craigcefnparc Primary School. The council would also seek to redeploy staff into other schools/establishments within the council. Staff would also be offered the option of taking early retirement or voluntary redundancy. Compulsory redundancy would only apply when all other avenues are exhausted.

Responses from the learners focused on the following areas:

Wellbeing – some learners mentioned that they were sad at the thought of the school closing and that they were anxious at the thought of a different school. Learners like their small and rural school and do not want to attend a bigger school. A number of pupils want to stay with their friends and are worried about the possibility of bullying at a larger school.

If the Council were to go ahead with the proposal we would work with Craigcefnparc Primary School, Clydach Primary School and all the learners involved to ensure that the transition is as easy as possible. If the school closed, all learners on roll that wished to have a place would move to Clydach Primary School as there is space there for all of the Craigcefnparc pupils. Friends would be in the school but not necessarily in the same class, as Craigcefnparc currently only has two classes to cover the whole age range of the school. Parents could wish to apply for a place in another school for their child, subject to availability, although places are limited at Craigmalen and Glais.

Facilities and opportunities – the Craigcefnparc learners like the facilities at the current school and think that everyone in a small school gets an opportunity to take part in everything. This might not be the case in a larger school.

If the proposal were to go ahead we are confident that the facilities and opportunities available to all learners would be equivalent or greater than the current offering.

Health – a number of pupils currently enjoy walking to school, the outdoor learning areas and the fresh air and are worried that the proposal would lead to increased traffic pollution.

As this is still a proposal the transport route has not been confirmed but it would usually involve a number of pick up points and learners would need to walk to these points. Possibly there would be fewer cars taking children to school if a bus is provided. Transport would be provided for children of statutory school age living in the village, as per our transport policy.

Wrap Around – concerns were raised about the ability to access breakfast club and after school clubs as the home to school transport arrives for the start of the school day and leaves at the end of the school day.

The council provides home to school transport for the start and end of the school day. All learners will have access to the wrap-around provision, however families would need to make arrangements for the drop-off and collection as is currently the case at the provisions being offered by Craigcefnparc. However, if the consistent demand is there, it is possible for

some of the minibuses to leave Craigcefnparc earlier to allow children to attend breakfast club. It is appreciated that it would be a longer journey to get to Clydach.

Travel – Some learners expressed concerns around the need to travel further to Clydach Primary School and about the safety of pupils outside the school.

A traffic assessment has been undertaken and traffic calming measures will be introduced around the Clydach site, regardless of the outcome of this proposal. It is accepted that the journey to Clydach Primary School would be longer than the current journey to school.

Staff – the learners praised their current school staff and are concerned about what would happen to them should the school close.

The council will support all staff to find a new job. If the proposal went ahead and extra staff were needed at Clydach Primary School we would ask that governors consider the staff at Craigcefnparc to fill these posts.

How have you changed your initiative as a result?

The initiative has not been changed as a result of the consultation and statutory notices process.

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.):

- Report to Cabinet on the findings of the statutory notice and for a decision to be made on whether to go ahead with the closure.

Section 5 – Other impacts:

Please consider how the initiative might address the following issues - see the specific Section 5 Guidance

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

Please explain any possible impact on each of the above.

Impact on...
Foster good relations between different groups
For the proposal to succeed there would be a focus on fostering relations for learners and parents with the designated school (if approval is given to proceed). Officers would work closely with staff at both schools concerned, in order to design a suitable transition plan and communication strategy to ensure pupils and parents are informed and supported throughout the process.
Advance equality of opportunity between different groups
A larger school can often increase the opportunities available for learners and the community. The proposal would look to build on the good work already taking place to ensure that all learners have opportunities to make the most of their education.
Elimination of discrimination, harassment and victimisation
For the proposal to succeed there would be a focus on building relationships between learners of both schools (if approval is given to proceed). Officers would work closely with staff at both schools concerned, in order to design a suitable transition plan and communication strategy in order to ensure pupils are informed and supported throughout the process. This would be vital to ease the transition for all involved and

avoid any discrimination, harassment or victimisation.

Reduction of social exclusion and poverty

There are low levels of deprivation in this area and therefore the impact on poverty/social exclusion is expected to be low. However, this will be continually monitored throughout the process. As mentioned previously, concerns were raised about the requirement to travel further to access the educational provision at Clydach Primary School with the home to school transport only providing a service for the beginning and end of the school day and not factoring in the desire to access wrap-around services as they currently do at Craigcefnparc. The Council is responsible for transporting pupils for education. Parents/carers of our learners are responsible for getting their learners to and from any out of school activities such as breakfast club and after school club.

What work have you already done to improve any of the above?

The school already has links with the community and this proposal would look to work with Clydach Primary School to further enhance this work should the proposal go ahead.

Is the initiative likely to impact on Community Cohesion? Please provide details.

If approved, the proposal would remove a school from the Mawr community. Consideration needs to be given, as part of any consultation, to the impact that this could have, however there is a community building available in the village. As mentioned previously, the Council's Local Well-being Plan has an objective 'To build Strong Communities with a sense of pride and belonging'. The definition of communities is not restricted to specific physical communities of any particular size but includes communities of interest too. The council's plans support the development of a new community which will be created at Clydach Primary School.

Arguably, this is an opportunity to be part of a more diverse community with potential benefits in terms of experiencing a wider range of cultures, languages and communities that can enrich pupils' experience. The most relevant of the 3 steps under the objective is 'individuals are connected and feel a sense of belonging' and, while this is true of a small school community, it is also true of larger school communities which tend to benefit from greater intercultural opportunities.

How does the initiative support Welsh speakers and encourage use of Welsh?

Craigcefnparc is an English-medium primary school but the Welsh language plays a key role throughout the curriculum. This would continue to be the case at Clydach Primary School and indeed any other English-medium school in Swansea.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

- Work on suitable transition planning if proposal goes ahead.

Section 6 - United Nations Convention on the Rights of the Child (UNCRC):

Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests. Please read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)? If not, please briefly explain your answer here and proceed to Section 7.

The initiative will have a direct impact on children and young people.

All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

The initiative is planned to improve pupils' school environment thus giving them the best opportunity of achieving to their full potential. The proposal relates to the following articles:

Article 3 - All organisations concerned with children should work towards what is best for each child.

Article 12 - Respect for the views of the child

Article 18 - Both parents share responsibility for bringing up their children. We should help parents by providing services to support them.

Article 28 - Children have a right to an education. Discipline in schools should respect children's human dignity.

Article 29 - Education should develop each child's personality and talents to the full.

Article 30 - Children have a right to learn and use the language and customs of their families.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Section 7 - Monitoring arrangements:

Please explain the monitoring arrangements for this initiative:

Monitoring arrangements: All projects within the Quality in Education (QEd) Programme have a clear monitoring process in place. Regular progress meetings are held with the school and the contractors, a formal Project Board is held monthly to discuss key issues and make key decisions, any issues can then be escalated to the Programme Board with the Strategic Programme Board (Corporate) having an overarching view of all Swansea Council projects.

Actions:

Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern

Outcome 2: Adjust the initiative – low level of concern

Outcome 3: Justify the initiative – moderate level of concern

Outcome 4: Stop and refer the initiative – high level of concern.

For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

During the last five years education provision at Craigcefnparc Primary School has been variable and lack of permanent leadership has been an impediment to school improvement. The local authority has intervened to provide considerable support and challenge to ensure necessary improvements were made in the quality of provision and in the quality of leadership. The local authority cannot sustain this level of support long term.

Consequently there are several specific reasons why this proposal has been made on educational grounds:

- a. Clydach Primary School can offer a wider range of facilities on a less restricted site, offering a greater flexibility in covering all areas of the curriculum and greater access to resources and staffing.
- b. Current and future anticipated pupil needs at Craigcefnparc Primary School can be appropriately met at Clydach Primary School.
- c. The size of Craigcefnparc Primary School raises the concern that the quality of educational provision may not be sustainable in the future.
- d. The larger team of staff at Clydach Primary School can provide a broader range of expertise in areas of the curriculum and in terms of leading whole school initiatives. It can provide staff with more opportunities to develop their skills and can enable the best use to be made of staff expertise.
- e. A larger school has more flexibility with its budget and can have access to a wider range of resources and staffing.
- f. Whilst 74.1% of learners on roll at Craigcefnparc Primary School are from the catchment area, only 45.5% of primary school age pupils living within the school's catchment area attended Craigcefnparc Primary School at January 2018.

A larger primary school has a larger team of staff that can provide more flexibility in terms of delivering the full curriculum. It can provide staff with more opportunities to develop their skills across the whole primary age range and can enable the best use to be made of staff expertise.

Moving pupils from Craigcefnparc Primary School to Clydach Primary School would provide pupils with an education in a larger, more sustainable school with greater curriculum and resource access, as well as allowing enhanced social and sporting opportunities for the learners and preparing them for their move to a larger secondary school.

Clydach Primary School has positive standards of achievement and received a favourable Estyn Inspection in 2014. The school is well managed and has a supportive governing body. The school benefits from consistency in leadership with the current headteacher being in post since 2012.

While there are no revenue savings to be achieved through this proposal, a larger school has more flexibility with its budget and can have access to a wider range of resources and staffing. Any efficiencies from having fewer schools in Swansea will be reinvested in the remaining schools for the benefit of all pupils in Swansea.

The very low numbers at Craigcefnparc Primary School inevitably restrict the range of opportunities for group and interactive work and change the nature of the social education that the school can provide.

The Council would benefit from the removal of a condition category C* building, reduced backlog maintenance and improved building efficiency.

*(2017 Swansea Schools Premises Collection Data).
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The latest Estyn Inspection ratings for the schools affected were:

School	Date	Current Performance Rating	Schools Prospects for Improving
Craigcefnparc	2015	Adequate	Adequate
Clydach	2014	Good	Good
Craigfelen	2018	Three excellent judgements and two good.	

Craigcefnparc Primary School was placed under Estyn Monitoring following its inspection in 2015. They were removed from monitoring in October 2016.

Section 9 - Publication arrangements:

On completion, please follow this 3-step procedure:

- 1. Send this EIA report and action plan to the Access to Services Team for feedback and approval – accesstoservices@swansea.gov.uk**
- 2. Make any necessary amendments/additions.**
- 3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.**

EIA Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Report to Cabinet to decide if a statutory consultation will take place on the closure of Craigcefnparc Primary School	Head of Service Head of Funding and Information Unit	21 st June 2018	Cabinet approval to consult	Completed
Carry out statutory consultation	Head of Service Head of Funding and Information Unit	18 th October 2018	Consultation completed and findings ready to be reported to Cabinet	Completed
Report findings of the consultation to Cabinet	Head of Service Head of Funding and Information Unit	20 th December 2018	Report prepared and decision taken by Cabinet	Completed
Report findings of the statutory notice period to Cabinet	Head of Service Head of Funding and Information Unit	21 st March 2019	Report prepared and decision taken by Cabinet	

* Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).

Resources Deployed to Prevent Problems Getting Worse at Craigefnparc (CCP) Primary School Support Briefing Paper 2016 – 2018

During these two years, it is estimated that the school has received in excess of 75 days of officer time to support school improvement i.e. curriculum, leadership, governor support and pastoral support. This is close to the amount that should be received in a five-year period. In addition, the local authority has funded an acting headteacher at the school since 2 November 2015. The resources provided to prevent the school declining do not include senior officer time in dealing with parental complaints, human resource matters and challenging progress at the school.

Background

- September 2013 – school judged as a school causing concern – adequate/adequate - challenge adviser (CA)
- May 2014 letter sent to CCP by lead challenge adviser in response to letter from the chair of governors where she had complained about the school's categorisation
- Spring 2014 review by local authority (LA) as part of second core visit (SCV) – literacy and numeracy focus. *Many of the recommendations identified at SCV 2014 still not addressed in January 2016. This was raised by the CA with the Deputy Headteacher in January 2016.*
- September 2014 – range of issues identified during the autumn core visit (ACV) by new CA
- Categorisation - Amber. Headteacher assured parents that in the subsequent year the school would be categorised as Yellow in a presentation to parents on 11 March 2015. This was despite it being stated by the CA in the ACV report that the school was on the cusp of being categorised Red. (Presentation on the school website)
- Regular support from (CA) throughout academic year 2014/2015 in preparation for the impending inspection, addressing the priorities from the ACV and recommendations from the last Estyn inspection, which had yet to be addressed. Support package of 15 days planned for during 2014-2015 academic year.
- May 2015 parental complaint – dealt with and resolved by chair of governors.
- Early spring 2015 work scrutiny and lesson observations undertaken as part of SCV – foundation phase (FP) judged barely adequate in lesson observations
- Estyn inspection May 2015 – placed in Estyn monitoring (see below)

6 recommendations:

1. Raise standards in reading and mental maths, particularly in key stage 2
2. Improve pupils' Welsh oracy skills across the school
3. Ensure that all teachers match tasks to pupils' ability levels and promote their independent learning skills
4. Raise levels of attendance
5. Develop the role of the governing body and senior leadership team in moving the school forward
6. Ensure that self-evaluation procedures lead to continuous improvement

- Summer 2015 - CA met with headteacher to support a post inspection action plan (PIAP).
- September 2015 - previous CA, new CA and headteacher met to review progress made by headteacher in drafting the PIAP – draft was barely adequate.
- Parental complaints escalate when the Estyn inspection report is published.
- By October 2015 – headteacher, deputy headteacher and senior teacher are on leave. Two Consultative Leaders (CL) are put in place to run the school and prevent deterioration of a critical situation. Local authority provides this resource to the school.
- Fire inspection report discovered by CLs. Nothing addressed since receipt of the report on 18 September 2015. Fire officer deems that without immediate action, the school could be closed.
- December 2015 written complaint received from parents raising concerns relating to inspection outcomes, staff sickness, standards, provision (including SEN) and communication. Chair of Governors met with representatives of the parent body as per the complaints policy. Main issues are leadership and provision at the school.
- December 2015 fire actions finalised – recognition from local authority after support from Health and Safety officer.

Local Authority Response/Resource Following Inspection

- Officer (CA) supported the acting headteacher to plan improvements in a post inspection action plan (PIAP)
- CA reviewed progress at fortnightly visits
- CA attended monthly meetings with PIAP governing body committee to review progress against the PIAP targets
- CA brokered support for literacy, numeracy and foundation phase performance specialists
- CA arranged school-to-school support for guided reading
- CA organised training for governors and staff on preparing for Estyn revisit
- Increased visits from Welsh support officer
- Head of Education Improvement visits the school to consider progress

Local Authority Response/Resource to Wider Issues

- Consultative Leadership (CL) support from two serving headteachers
- October 2015 ACV – categorisation is Red as no recommendations from previous ACV/inspection had been addressed and all senior staff off sick. Red support package of up to 25 days in place.
- October 2015 CLs addressed fire inspection action plan
- October 2015 CLs addressed on-going issues with parents through a parents' meeting
- 2 November 2015 acting headteacher funded by the LA brought to the school because of high risk

Agenda Item 12.



Report of the Cabinet Member for Education Improvement, Learning and Skills

Cabinet – 21 March 2019

First Stage (Construction) Contract Award and Associated Capital Programme Authorisation for the Remodelling and Refurbishment Project at Bishopston Comprehensive School

Purpose:	<ul style="list-style-type: none">• To seek authorisation to award the Stage One contract for the works to Tender 4.• To seek authorisation to commit a total of £551,469 to the capital programme to fund the pre-construction phase costs. To comply with Financial Procedure Rule 7 – to commit and authorise a new scheme to the Capital Programme.• The Revenue Budget 2018/2019 and the Capital Budget 2017-2018 to 2023-24 was approved by Council on 6 March 2018.
Policy Framework:	<ul style="list-style-type: none">• QEd Programme and Strategic Outline Programme for Band B of the 21st Century Schools Programme• Asset Management Plan• Contract and Financial Procurement Rules
Consultation:	Access to Services, Finance, Legal, Corporate Building and Property Services.
Recommendation(s):	It is recommended that: 1) That Contractor 4 be appointed to carry out the pre-construction service to the sum of £392,000. Contractor 4 is considered to represent the most economically advantageous tender and that which gives best value to the authority.

- 2) That £551,469 is committed to the capital programme to fund the pre-construction phase costs, including the pre-construction contractor service and internal fees.
- 3) The Chief Legal Officer is authorised to enter into any necessary documentation to complete the contract and achieve the project.
- 4) That a further report is submitted in late 2019 to consider the approval of the Stage Two contract award and subject to confirmation and acceptability of construction costs to commit the project cost to the capital programme prior to any physical works being carried out.

Report Author: Louise Herbert-Evans

Finance Officer: Ben Smith

Legal Officer: Debbie Smith

Access to Services Officer: Catherine Window

1. Introduction

- 1.1 The Welsh Government formally confirmed on the 7 December 2017 that the envelope for Band B of the Council's 21st Century Schools / QEd Programme was approved in principle with an estimated programme envelope cost of £149.7 million. This is subject to the approval of individual project business cases.
- 1.2 The approval in principle of the Strategic Outline Programme for Band B does not commit the Council, since the final approval of any capital allocation from the Welsh Government is subject to the submission of further detailed business cases in respect of each specific project.
- 1.3 Swansea Council's Quality in Education (QEd) / 21st Century Schools Band B Programme focuses on an investment need which reflects the challenges remaining across our schools. The Band B programme remains consistent with local policies, priorities and commitments, as well as the priorities and specific criteria set down by the Welsh Government as follows:
 - To provide an efficient and effective educational infrastructure that will meet current and future demand for places by 2024
 - Ensuring the right size schools in the right location, with enough places to deliver Welsh and English medium education, whilst ensuring effective and efficient use of the educational estate
 - Reducing backlog maintenance costs by at least 50% whilst improving any category C or D condition buildings to A or B
- 1.4 The Council's 21st Century Schools Programme Capital Expenditure & Financing 2017/18 - 2023/24 provides an outline spending profile for the

priority projects. Included within this phase of priority projects is English - medium secondary schools, which aims to address the significant condition and suitability needs across a number of sites which are well beyond the scope of the Council's annual structural maintenance programme. Works will need to be phased across Bands B,C and D reflecting the level of funding available, prioritising the areas of greatest need.

- 1.5 Bishopston Comprehensive School is the first of those projects and has been scoped with an indicative budget cost at this stage of £11,865,981.

2. Description of the scheme

- 2.1 The proposed scheme will include the refurbishment and remodelling of the existing Phase 1,2 and 3 buildings, together with a two-storey extension to replace the demountables which are no longer fit for purpose and address the accommodation deficiencies.
- 2.2 It does not include the relatively recently constructed Specialist Teaching Facility, and will not result in a change to the capacity of the school.
- 2.3 The indicative project timeline is outlined below;

Milestone	Start Date	End Date
Design Development RIBA Stage 2-4	06/03/2019	07/10/2019
Planning Period	07/10/2019	27/01/2020
FPR7 Stage 2 – Construction	17/02/2020	02/03/2020
FBC Completion / Economic Case Review	02/03/2020	16/03/2020
Planning Condition / Discharge		29/05/2020
Demolition Period	May	June 2020
Construction of new build period	June 2020	March 2021
Remodelling / refurbishment (main building)	March 2021	Dec 2021
Transition / Occupation	Dec 2021	Jan 2022

3. Objectives of Project

- 3.1 The programme of works has been prioritised to address the areas of greatest need, and are to;
- a) Provide a fit for purpose 21st Century learning environment for pupils and staff at Bishopston Comprehensive in line with BB98 guidelines and with improved accessibility, and safeguarding infrastructure by January 2022
 - b) Continue to at least maintain attainment levels
 - c) Reduce structural backlog maintenance by January 2022
 - d) Remove condition category C- by January 2022

- e) Improve building efficiency, maximising use of assets, improving operational efficiency and use of all relevant resources by January 2022

4 Procurement

- 4.1 This project was procured through a two-stage procurement process utilising the South West Wales Regional Framework via a mini competition to procure a contractor to develop the design and carry out the construction works. Stage One includes the carrying out of all necessary surveys, obtaining required reports and investigations and developing the initial design to obtain planning permission and building regulations approval. At this point the contractor will tender the works packages and provide the Council with a fixed cost for the works. Stage Two is the period when the contractor executes out the construction works, which will be carried out in phases to minimise disruption to the operation of the school.
- 4.2 A mini tendering exercise was undertaken through the e-tender portal, inviting eight bidders from the SWWRCF Contractor Framework. Six Framework contractors accepted the invitation to tender, the remaining two contractors declined to tender.
- 4.3 The Tender Evaluation Report of 12 February, 2019 sets out the tendering procedure.
- 4.4 All six tenders were returned and opened in accordance with the Authority's Contract Procedural Rules on 1st February, 2019.

		<u>Quality</u>	<u>Price</u>	<u>Total</u>
1.	Contractor 1	1885	2430	4315
2.	Contractor 2	1950	2383	4333
3.	Contractor 3	2035	2445	4480
4.	Contractor 4	2040	2456	4496
5.	Contractor 5	2055	2424	4479
6.	Contractor 6	1810	2462	4272

- 4.5 Contractor No. 4 has been approved by the Tender Evaluation Panel, and recommended for Contract Award by the Responsible Officer and Finance, Legal, Democratic Services and Business Intelligence and Commercial Services in accordance with the Council's Contract Procedure Rules.
- 4.6 The tender value for the Stage One contractor appointment is £392,000.

5. Financial Implications

Capital

- 5.1 Welsh Government funding for Band B of the 21st Century Schools Programme is being provided through £600m capital and £500m revenue funding for the whole of Wales. It is proposed that the capital investment projects related to the specific proposals within this report are funded from traditional capital streams. It was announced by Welsh Government on the 21 November 2018, that For Band B the grant rate for capital projects will be increased to 65%. (The intervention rate for special schools and PRUs will be increased to 75%). However the programme envelope remains the same.
- 5.2 The total estimated cost of the new build for Bishopston Comprehensive School is estimated to be £11,865,981 against the overall Band B programme envelope of £141.6m (excluding the potential aided sector project which is assumed to require no Council contribution). This would require a local contribution of £4.153m from the overall net funding requirement based on a 35% contribution.
- 5.3 The Welsh Government have approved in principle the overall Band B funding envelope subject to the specific approval of each individual project business case. As such there is no specific approved budget for any individual project. The funding mechanism and timescale for delivery is still to be confirmed with the Welsh Government and the delivery of all the projects is dependent on final approval of Band B funding and the specific additional Welsh Government capital grant.
- 5.4 Cost estimates are on a current-cost basis, with no allowance for construction inflationary pressures, where there is uncertainty regarding the timing of projects. However, optimism bias has been applied to each project in accordance with the lessons learned from delivery of Band A, and based on assessment of outstanding programme risks/unknowns.
- 5.5 The approval in principle of the Strategic Outline Programme for Band B does not commit the council to the indicative funding contributions set out above since the final approval of any capital allocation from the Welsh Government is subject to the submission of further detailed business cases in respect of each specific project. On 27 February Welsh Government informed Swansea Council the Minister for Education had approved the Strategic Outline Case (SOC) / Outline Business Case (OBC) in respect of Bishopston School and we are now able to progress to Full Business Case (FBC) stage.
- 5.6 A Delegated Powers Report Financial Procedure Rule 7 (FPR7) Report was approved in February 2018, when £280,300 was initially committed to the capital programme in respect of pre-construction phase fees and surveys.

- 5.7 The pre-construction phase costs including the Stage One contractor appointment of £392,000, all internal fees including CBS and Education fees to undertake all the necessary surveys, obtain required reports and investigations and develop the initial design to obtain planning permission and building regulations approval to the completion of RIBA Stage 4 and the commencement of construction are £551,469.00. This requires an uplift of £271,169 to the pre-construction phase costs.
- 5.8 The total pre-construction phase costs of £551,469.00 are being committed at risk and if the final scheme is approved will be offset against the total project cost, and form part of the Council's 35% contribution.
- 5.9 Once the pre-construction stage has been completed, the contractor will tender the work packages and the Council will be provided with a fixed cost for the works. At that point a further Contract Award and FPR7 Report will be submitted to Cabinet to award Stage Two and commit the full project value (which is currently estimated to be £11.865,981m) to the capital programme.
- 5.10 The Financial Implications are set out in Appendix 1; these are shown for the whole project for completeness, although at this stage only the pre-construction phase costs totalling £551,469.00 are to be committed.

Revenue

- 5.11 Schools are funded from an overall delegated budget – the Individual Schools Budget (ISB). There is a funding formula that allocates a budget share to each individual school from the ISB. The floor area of the school is likely to increase and this will result in an increase of budget share.
- 5.12 The existing backlog maintenance £3,326,744 which will be a mix of both capital and revenue costs would be significantly reduced.
- 5.13 There will be an increase in business rates, energy costs, and cleaning etc due to the increase in floor area, however the refurbished and new buildings would be more energy efficient.

6. Legal Implications

- 6.1 The South West Wales Regional Framework led by Carmarthenshire County Council has been established in accordance with EU legislation. The Contract Award is recommended for approval in accordance with the Council's Contract Procedure Rules.
- 6.2 Any contractual liabilities/obligations with the successful tenderer will be covered by appropriate contract documentation to be prepared and approved by the Chief Legal Officer.

7. Equality and Engagement Implications

7.1 The Council is subject to the Public Sector Equality Duty (Wales) and must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Our Equality Impact Assessment process ensures that we have paid due regard to the above.

7.2 A full Equality Impact Assessment has been undertaken (Appendix 2), and it shows that this project will have a positive impact on;

7.3 *Age* – Bishopston Comprehensive School is a school for pupils aged 11-16 years. This project will have a very positive impact on the Education of all 11-16 year olds who attend the school in the future

7.4 *Disability* – The design, delivery and implementation of this project has taken full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. The design of the new buildings and the running of the school in the future will ensure that ALL the pupils and staff can make the most of their new environment.

7.5 *Welsh* – All public signage within the school will be bilingual.

7.6 As part of this process we have considered the Well-being of Future Generations Act. The Act ensures that public bodies think more about the long term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach.

7.7 The Band B programme is based upon a consistent and objective assessment of each sector and school catchment, reviewing current pupil numbers and capacities with projected future demand for places and also the number of pupils nearest to each School. This has demonstrated that there is a continued and sustained need for the English-medium secondary school in this location.

7.8 All projects have a communication plan, which is reviewed regularly. This includes the engagement strategy; in this case there has been extensive engagement with the other site users Cultural Services and Freedom Leisure, and the team are also working closely with the Specialist teaching Facility Manager to ensure that other agencies and support are fully engaged.

- 7.9 The school (governors, head, staff, pupils, parents) have been fully engaged since project inception, and this will continue throughout the lifecycle of the project to ensure that the views of stakeholders are fully taken into account.
- 7.10 This project is a good example of where the Council is seeking to incorporate the flexible and multiple use of assets. The site is already a mixed use site, however working closely with Cultural Services and Freedom Leisure, the project should support that mixed use, to the benefit of the school and the community.
- 7.11 The scope of the project includes to improve accessibility, safeguarding and security, improve energy efficiency, reducing CO2 emissions and enhancing the learning environment.
- 7.12 The project will also be subject to community benefits targets which will include;
- STEM Engagement target of 100 hours per million investment.
 - Provide opportunities for NEETs and Long Term unemployed (benchmark of one FTE per million per construction project)
 - Jobs created (52 weeks per million investment on each construction project)
 - 25 person training weeks provided per million investment
 - 1 apprentice per million investment per construction project.
 - 85% of waste diverted from landfill
 - Max 10 tonnes waste per million

Background Papers:

Capital Budget and Programme 2018/19 – 2023/25

Quality in Education (QEd) – Emerging Proposals and Investment Priorities for the next band of the 21st Century Schools Programme. Cabinet 20 July 2017

Delegated Powers Report to Cabinet Member for Education, the Chief Education Officer, the Head of Financial Services, and the Head of Legal, Democratic Services and Business Intelligence - 20 February 2018 - Band B – Progression of early projects to Full Business Case

Appendices

Appendix 1 Financial Implications

Appendix 2 Equality Impact Assessment

FINANCIAL IMPLICATIONS : SUMMARY

Portfolio: Education
Service : Planning and Resources
Scheme : Bishopston Comprehensive School

1. CAPITAL COSTS	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	TOTAL
	£	£	£	£	£	£	£
<u>Expenditure</u>							
Stage 1: Pre-construction	34,716	62,272	350,261	104,220			551,469
Stage 2: Construction							
Costs			150,000	4,900,000	5,531,735	150,000	10,731,735
Stage 2: Fees			351,531	126,000	105,246		582,777
EXPENDITURE	34,716	62,272	851,792	5,130,220	5,636,981	150,000	11,865,981
<u>Financing</u>							
CCS funding	34,716	62,272	239,812	1,795,577	1,972,943	52,500	4,157,820
WG grant			611,980	3,334,643	3,664,038	97,500	7,708,161
FINANCING	34,716	62,272	851,792	5,130,220	5,636,981	150,000	11,865,981

2. REVENUE COSTS	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	TOTAL
	£	£	£	£	£	£	£
<u>Service Controlled - Expenditure</u>							
Employees) NA) NA) NA) NA) NA) NA	0
Maintenance) NA) NA) NA) NA) NA) NA	0
Equipment) NA) NA) NA) NA) NA) NA	0
Administration) NA) NA) NA) NA) NA) NA	0
NET EXPENDITURE	0	0	0	0	0	0	0

Equality Impact Assessment (EIA) Report (Appendix 2)

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

Please refer to the 'EIA Report Form Guidance' while completing this form. If you need further support please contact acesstoservices@swansea.gov.uk.

Where do you work?
Service Area: Education Planning and Resources
Directorate: Education

(a) This EIA is being completed for a:

Service/ Function	Policy/ Procedure	Project	Strategy	Plan	Proposal
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(b) Please name and describe here:

Bishopston Comprehensive School Re-modelling Project

The proposed project will include the remodelling and refurbishment of the existing Phase 1,2 and 3 buildings, together with a two-storey extension to replace the demountables which are no longer fit for purpose and address the accommodation deficiencies.

It does not include the relatively recently constructed Specialist Teaching Facility, and will not result in a change to the capacity of the school.

(c) It was initially screened for relevance to Equality and Diversity on: 19/03/2018

(d) It was found to be relevant to...

Children/young people (0-18)	<input checked="" type="checkbox"/>	Sexual orientation	<input type="checkbox"/>
Older people (50+).....	<input checked="" type="checkbox"/>	Gender reassignment	<input type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	Welsh language	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Poverty/social exclusion.....	<input checked="" type="checkbox"/>
Race (including refugees).....	<input checked="" type="checkbox"/>	Carers (including young carers).....	<input checked="" type="checkbox"/>
Asylum seekers	<input type="checkbox"/>	Community cohesion	<input checked="" type="checkbox"/>
Gypsies & Travellers.....	<input type="checkbox"/>	Marriage & civil partnership	<input type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>	Pregnancy and maternity	<input type="checkbox"/>
Sex.....	<input checked="" type="checkbox"/>		

(e) Lead Officer

Name: Sarah Weir / Louise Herbert-Evans

Job title: School Project Business Case
Development Officer

Date: 19/03/2018
Updated 03/01/2019

(f) Approved by Head of Service

Name: Brian Roles

Date: 19/03/2018

Section 1 – Aims (See guidance):

Briefly describe the aims of the initiative:

What are the aims?

This is a priority project for the Quality in Education (QEd) Programme as part of the Welsh Government's 21st Century Schools Programme. It will address the significant condition and suitability issues at the school.

It will mitigate the current business continuity risks, provide a 21st century learning environment, and enable the remodelling and repurposing of the existing spaces to provide more suitable and cohesive faculty areas.

The proposal will upgrade school facilities but will not increase the pupil capacity which currently stands at 1094, and will also involve the removal of the existing sub-standard demountable buildings.

The programme of works has been prioritised to address the areas of greatest need, and are to;

- a) Provide a fit for purpose 21st Century learning environment for pupils and staff at Bishopston Comprehensive in line with BB98 guidelines and with improved accessibility, and safeguarding infrastructure by January 2022
- b) Continue to at least maintain attainment levels
- c) Reduce structural backlog maintenance by January 2022
- d) Remove condition category C- by January 2022
- e) Improve building efficiency, maximising use of assets, improving operational efficiency and use of all relevant resources by January 2022

Who has responsibility?

The project will be jointly funded by Swansea Council (35%), and Welsh Government (65%) subject to the approval of a successful Final Business Case.

The overall responsibility lies with Swansea Council; Cabinet, Chief Executive, Director of Education and the Head of Education Planning and Resources (the Senior Responsible Officer), together with the School specifically the Headteacher and Governing Body.

Who are the stakeholders?

Each stakeholder group requires a specific method of communication to promote key messages during the project. A broad approach for communications methods is outlined below. It draws on corporate methods of communicating to staff in general as well as some established meeting structures within the project.

Audience	Methods
Parents	Letters, media, social media, website
Governors	Face to face briefing, emails
Head and Management Team	Face to face briefing, emails,
Pupils	Face to face school visits, social media
Feeder School Heads	Face to face, letter, email, newsletter
Feeder school parents	Letter, website, parents' evenings, local media, social media
CMT	Face to face briefing, newsletter, email
Cabinet	Face to face briefing, newsletter, email
Group Leaders	Face to face briefing, newsletter, email
Ward Members	Email, phone call

Trade Unions	Face to face briefing, email
Evening Post	Face to face briefing, press release
Welsh Government	Letter, local media, email
Estyn	email
AMs/MPs	email
School staff	Face to face, letter, Newsletter, media, social media, website
Swansea Bay Radio, Wave/Swansea Sound, BBC, ITV, Western Mail,	Press release
Education SLB/EDSLT/DMT	email, newsletter, face to face
O and S Chairs and V Chairs	Email
Catering and cleaning staff	face to face, email
Community groups	Letter and liaison with Community Regen, social media, website
All Council staff	Staffnet, website, social media
Swansea residents	Media, website, social media
Local businesses	Media, letters, website, social media
Bus operators	Email from Education/Transport
Taxi operators	Email from Education/Transport

Section 2 - Information about Service Users (See guidance):

Please tick which areas you have information on, in terms of service users:

- | | | | |
|------------------------------------|-------------------------------------|--------------------------------------|-------------------------------------|
| Children/young people (0-18) | <input checked="" type="checkbox"/> | Sexual orientation | <input type="checkbox"/> |
| Older people (50+)..... | <input checked="" type="checkbox"/> | Gender reassignment | <input type="checkbox"/> |
| Any other age group | <input checked="" type="checkbox"/> | Welsh language | <input checked="" type="checkbox"/> |
| Disability | <input checked="" type="checkbox"/> | Poverty/social exclusion..... | <input checked="" type="checkbox"/> |
| Race (including refugees)..... | <input checked="" type="checkbox"/> | Carers (including young carers)..... | <input checked="" type="checkbox"/> |
| Asylum seekers | <input type="checkbox"/> | Community cohesion | <input checked="" type="checkbox"/> |
| Gypsies & Travellers..... | <input type="checkbox"/> | Marriage & civil partnership | <input type="checkbox"/> |
| Religion or (non-)belief | <input type="checkbox"/> | Pregnancy and maternity | <input type="checkbox"/> |
| Sex..... | <input checked="" type="checkbox"/> | | |

Please provide a snapshot of the information you hold in relation to the protected groups above:

Pupil information –

SIMS which is linked with the authority's 'CAPITA One' system which gives more detailed information about pupils. This is managed by the local authority to ensure that the needs are met of all pupils in all schools within the City & County of Swansea.

General information about schools is collected in January every year as part of the National Census (PLASC).

All the data shown below is correct as at January 2019 PLASC

Race			
	Stage A-C	Stage A-D	Stage A-E
Percentage with English as an Additional Language (EAL)	0.9%	2.2%	4.1%

Race					
Ethnic Background	Year 7	Year 8	Year 9	Year 10	Year 11
Non White British	7.9%	3.0%	7.4%	5.4%	4.0%

The data below shows the data for 2018-19 and the previous two years.

Poverty and Exclusion			
	2016-2017	2017-2018	2018-2019
Percentage of total pupils on roll living in areas classed in Welsh Index of Multiple Deprivation (WIMD) as being in the most deprived 30% of all areas	5.4%	5.4%	Available March 2019
Percentage claiming Free School Meals	5.9%	4.6%	5.6%

Disability			
	2016-2017	2017-2018	2018-2019
Percentage with Special Educational Needs (SEN)	13.5%	20.3%	18.5%

From 2017, PLASC no longer includes rankings for SEN needs. The table below therefore shows all needs recorded in PLASC for each pupil.

Need	School Action	School Action Plus	Statement	Total
Attention Deficit Hyperactivity Disorder	1	1	2	4

Autistic Spectrum Disorders	3	0	19	22
Behavioural, Emotional & Social Difficulties	5	24	8	37
Dyscalculia	0	0	0	0
Dyslexia	20	9	1	30
Dyspraxia	2	4	1	7
General Learning Difficulties	34	10	3	47
Hearing Impairment	3	4	3	10
Moderate Learning Difficulties	30	12	9	51
Multi-Sensory Impairment	0	0	0	0
Physical and Medical Difficulties	7	6	4	17
Profound & Multiple Learning Difficulties	0	0	1	1
Severe Learning Difficulties	0	2	3	5
Speech, Language and Communication Difficulties	8	9	25	42
Visual Impairment		1	1	2
Total	113	82	80	275

Gypsies and Travellers

This data would indicate that the school does not have any pupils that recognise themselves as Gypsies or Travellers.

Sex

The school has 601 boys and 509 girls on roll (January 2019).

Welsh language

7 pupils have Welsh as a first language and 4 of the 71 teachers are qualified to teach Welsh as a second language.

Staff and other age groups

Staff

This data to be collected in November 2019 as part of the new workforce census.

Carers

We do not currently hold any information on this

Community Cohesion

The community leisure centre on the school site is now managed by a 3rd party (Freedom Leisure) and will continue to offer community use during the school day as well as out of hours. These facilities are open to the public from 7.15am to 10pm

Future cohorts

Pupil projections show the school takes 29% out of catchment pupils in addition to all of its own catchment. The school will also continue to meet its AN of 218 up to and including September 2024.

Any actions required, e.g. to fill information gaps?

To obtain information on the missing protected characteristics such as religion, sexual orientation and gender reassignment, and also on staff and carers.

Section 3 - Impact on Protected Characteristics (See guidance):

Please consider the possible impact on the different protected characteristics.

	Positive	Negative	Neutral	Needs further investigation
Children/young people (0-18)-	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Older people (50+) --	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other age group --	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability --	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race (including refugees) --	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Asylum seekers --	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gypsies & travellers --	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or (non-)belief --	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex --	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation --	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment --	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Welsh Language --	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poverty/social exclusion --	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers) --	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Community cohesion --	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage & civil --	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity --	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Thinking about your answers above, please explain in detail why this is the case.

Children/young people (0-18) - Bishopston Comprehensive School is an 11-16 school. This project will have a very positive impact on the Education of all 11-16 year olds who attend the school in the future. Specifically this will be in relation to better teaching and learning facilities brought about by better alignment of curriculum areas and updated classrooms. An extension to the main teaching block will give the school a dedicated science block which will support the realignment of faculties across the school buildings.

Although the completed works in the school will have a positive impact, there is likely to be some short-term disruption to those currently attending the school due to the phasing of works in line with the academic requirements. These phases will be developed with the school's Senior Leadership Team and will be minimised as far as is possible.

Older People 50+/Any other age group – The staff, parents, carers and wider school community will benefit greatly from improved facilities to deliver education to all pupils. This will be due to better access to community focused areas. Freedom Leisure have now taken over the running and management of the Leisure Centre, which is located within the school grounds. They will continue to work with the school and utilise the school gyms out of school hours providing a valuable community facility.

Disability – The design, delivery and implementation of this project will take full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. The design of any new building, the re-modelling and the running of the school in the future will ensure that ALL the pupils and staff can make the most of their improved environment. An access audit has been undertaken in the school and the findings of this report will be added to the key considerations when scoping the works to be undertaken.

In the short term the construction works could impact on certain disability groups unless the

issues are not carefully considered and managed. Early discussions are taking place with stakeholders to mitigate any impact.

Sex - The proposed changes will see the quality of provisions for both boys and girls maintained if not improved.

Welsh – All public signage within the school will be bilingual.

Poverty/social exclusion & Carers – The remodelling will include an improved entrance and meeting rooms, that will provide suitable private places to support families and carers engaging with other agencies and social services.

Community Cohesion – Due to the improved facilities provided as part of the refurbishment project there will be increased opportunities for the community to make the most of the school's facilities.

Section 4 - Engagement:

Please consider all of your engagement activities here, e.g. participation, consultation, involvement, co-productive approaches, etc.

What engagement has been undertaken to support your view? How did you ensure this was accessible to all?

There is an on-going engagement with all stakeholders (as listed) as the project develops and is implemented. This includes face to face meetings, newsletters and online material.

Bishopston pupils and staff at the school have completed a questionnaire telling the project what they would like to see in the remodelled and refurbished buildings. 75% of pupils and staff responded using the online questionnaire. All pupils responded positively to the works going ahead in the school. Many wanted faculties to be better aligned and sign posted.

The results of the survey have been collated and will continue to be used and developed by the project team as part of the design workshops with the school.

A School Council update will also be arranged where the outcomes can be discussed and how they are being used in the design process. Further updates with the School Council will continue throughout the project and updated as part of the on-going web updates.

The Specialist Teaching Facility Manager has been engaged to support in considering specific and anticipated requirements to ensure that the school is accessible to all pupils.

What did your engagement activities tell you? What feedback have you received?

Even though the school buildings require work 50% of pupils like where they are taught, but over 50% of pupils did not think the buildings were light and airy enough.

The vast majority of pupils strongly agreed that they could find their classrooms and did not get lost which supports the strategy to retain the buildings in their current form with changes to faculty areas only.

However, the one area all pupils were in strong agreement with was their dislike of the

toilets. These will be significantly refurbished as part of the programme of works in the school.

Parts of the school are inaccessible other than by staircases. This needs to be considered as part of the design to ensure that all pupils can access all unique areas.

Success Maker, which is designed to support pupils who need it, with literacy and numeracy is currently delivered in a classroom on the first floor of the Leisure Centre. This means that those pupils that need the greatest support are losing valuable learning time travelling between classes. This should be addressed as part of the project.

The school has very limited space for small group work and meetings with parents and carers.

How have you changed your initiative as a result?

The pupil and staff engagement has and will continue to support the design process.

The project will not achieve sign off if it does not take account of the needs of users.

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.):

The project team will continue to engage both in the design and construction phase with stakeholders to ensure that it is planned and implemented to maximise the benefits to stakeholders and ensure a positive impact on the protected characteristics.

Further sessions will be held for the community, learners, staff and parents as the project develops.

It is anticipated that the planning application will be submitted later in the year which is another opportunity for all stakeholders to share their views.

Section 5 – Other impacts:

Please consider how the initiative might address the following issues - see the specific Section 5 Guidance

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

Please explain any possible impact on each of the above.

Impact on...
Foster good relations between different groups
There is already community use of the school's facilities. The project aims to refurbish some of the sports' facilities and create further opportunities for the community to make use of the facilities. The team have already engaged with Cultural Services and Freedom Leisure who now manage the Leisure Centre. The project, which coincides with the new Freedom Leisure contract, has created a

timely opportunity to support this and maximise benefits.
For example Freedom Leisure are undertaking some improvements to the Leisure Centre having worked closely with the school and which will benefit staff and pupils as well as the wider community alike. This will be complemented by any improvements that are able to be made to the sports facilities within the school that have a wider community use.

Discussions are also being undertaken around the wider site management to ensure improved traffic management and safeguarding. This may be supported with the proposed investment.

Advance equality of opportunity between different groups

The project will provide access for all pupils/teachers to an improved learning environment. This may provide greater opportunities for children from the Specialist Teaching Facility to use more of the facilities in the main school buildings.

It will also provide increased opportunities for community use, whilst enhancing safeguarding and also the school's use of the leisure facilities.

Elimination of discrimination, harassment and victimisation

The project will be Secure by Design, and aim to reduce the number of secluded settings within the school site that would allow opportunities for bullying etc.

Currently some areas of the school are not accessible and the project will aim to address this.

Reduction of social exclusion and poverty

Modern learning environment encourages attendance and this leads to better outcomes for individual pupils and gives every child/young person a better start in life. Specifically the remodelled school will provide a more welcoming environment for families and carers and provision for meeting and support.

What work have you already done to improve any of the above?

The school already has very strong links with the community and this project has since its inception considered how it can enhance and develop these opportunities.

Is the initiative likely to impact on Community Cohesion? Please provide details.

Yes. The school already has a positive impact on its community via community and leisure facilities. The improvements proposed will provide an opportunity for the school to build on this through greater use of its facilities by the community. The project team are actively engaging with in addition to the school, Freedom Leisure and Cultural Services to support this.

How does the initiative support Welsh speakers and encourage use of Welsh?

Although the school is an English-medium school all public signage will be bilingual and the school will continue to promote the national curriculum inc. the teaching of Welsh.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Continue to work with Freedom Leisure and Cultural Services to enhance community links and opportunities.

Section 6 - United Nations Convention on the Rights of the Child (UNCRC):

Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests. Please read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)? If not, please briefly explain your answer

here and proceed to Section 7.

The initiative will have a direct impact on children and young people.

All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

The initiative is planned to improve pupils' school environment thus giving them the best opportunity of achieving to their full potential. The proposal relates to the following articles:

Article 3 - All organisations concerned with children should work towards what is best for each child.

Article 12 - Respect for the views of the child

Article 18 - Both parents share responsibility for bringing up their children. We should help parents by providing services to support them.

Article 28 - Children have a right to an education. Discipline in schools should respect children's human dignity.

Article 29 - Education should develop each child's personality and talents to the full.

Article 30 - Children have a right to learn and use the language and customs of their families.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Pupils, parents and staff will continue to be fully engaged throughout the lifecycle of the project to ensure that the views of stakeholders and specifically the pupils are considered and that the project optimises benefits in relation to the objectives and the directly linked Articles.

Section 7 - Monitoring arrangements:

Please explain the monitoring arrangements for this initiative:

Monitoring arrangements:

All projects within the Quality in Education (QEd) Programme have a clear monitoring process in place. Regular Project Team meetings are scheduled with the school and the design team / contractors; a formal report is presented monthly to Delivery Group for information and / or decision, any issues are escalated to the QEd Programme Board if required.

Actions: Regular Project Team meetings. Timely and accurate reporting to Delivery Group.

Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern

Outcome 2: Adjust the initiative – low level of concern

Outcome 3: Justify the initiative – moderate level of concern

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Outcome 4: Stop and refer the initiative – high level of concern.



For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

Section 9 - Publication arrangements:

On completion, please follow this 3-step procedure:

- 1. Send this EIA report and action plan to the Access to Services Team for feedback and approval – accesstoservices@swansea.gov.uk**
- 2. Make any necessary amendments/additions.**
- 3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.**

EIA Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Seek to collect information on religion, sexual orientation and gender reassignment and also more generally on staff to ensure that the needs of all children and young people are met.	Head of Stakeholder Engagement Unit	April 2018	Data collected (if any) and actions proposed	
Continue to involve all stakeholders in the design and implementation of these proposals.	Project Manager	Ongoing	Learners and other stakeholders playing a part in the design and build	Staff pupil engagement already commenced. Further sessions are being planned
Continue to work with Freedom Leisure and Cultural Services to enhance community links and opportunities.	Project Manager	December 2020	Local community supportive of the development	Engagement commenced
Regular meetings of Project team meeting and timely and accurate reporting to Delivery Group.	Project Manager	Monthly	Regular meetings held and decisions taken	The group continues to meet and key decisions are made
Consultation via the formal Planning process.	Project Manager	July 2019	Views of stakeholders received and decision taken on Planning	

* Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).

Agenda Item 13.



Report of the Local Authority Governor Appointment Group

Cabinet – 21 March 2019

Local Authority Governor Appointments

Purpose:	To approve the nominations submitted to fill Local Authority Governor vacancies in School Governing Bodies
Policy Framework:	Local Authority (LA) Governor Appointments Procedure (Adopted by Council on 26 October 2017)
Consultation:	Access to Services, Finance, Legal
Recommendation(s):	It is recommended that: 1) The nominations recommended by the Director of Education in conjunction with the Cabinet Member for Education Improvement, Learning and Skills be approved.
Report Author:	Gemma Wynne
Finance Officer:	Chris Davies
Legal Officer:	Stephen Holland
Access to Services Officer:	Catherine Window

1. The nominations referred for approval

1.1 The nominations are recommended for approval as follows:

1. Llanrhidian Primary School	Mrs Felicity Parrott
2. Portmead Primary School	Ms Sharon Rees
3. YGG Lonlas	Ms Lisa Lewis

4. YGG Pontybrenin	Mr Keith Collins
5. Bishopston Comprehensive School	Mr Adrian Novis

2. Financial Implications

- 2.1 There are no financial implications for the appointments; all costs will be met from existing budgets.

3. Legal Implications

- 3.1 There are no legal implications associated with this report.

4. Equality and Engagement implications

- 4.1 The Council is subject to the Public Sector Equality Duty (Wales) and must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.
- 4.2 Our Equality Impact Assessment process ensures that we have paid due regard to the above.
- 4.3 There are no equality and engagement implications associated with this report.

Background papers: EIA Screening Form

Appendices: None

Agenda Item 14.



Report of the Cabinet Member for Business Transformation & Performance

Cabinet – 21 March 2019

Building Capital Maintenance Programme 2019/2020

Purpose:	To agree the schemes to be funded through the Capital Maintenance programme
Policy Framework:	Financial Procedure Rule No.7 (Capital Programming and Appraisals) The Revenue and Capital Budget as reported to and approved by Council on the 28 th February 2019
Consultation:	Access to Services, Finance, Legal, Education, Social Services
Recommendation(s):	It is recommended that Cabinet: 1) Approves the proposed capital maintenance schemes for Building Services, as listed in Appendix A. 2) Delegates authority to the Director and Cabinet Member to approve individual Social Services schemes. 3) Authorises the financial implications identified in Appendix C & D to be included in the capital programme.
Report Author:	Nigel Williams
Finance Officer:	Ben Smith
Legal Officer:	Debbie Smith
Access to Services Officer:	Catherine Window

1.0 Introduction

Cabinet has previously approved the Council's Asset Management Plan for Property Assets which sets out a series of measures to improve the management and performance of the property portfolio. This Report sets out the way in which the Capital Maintenance resources for 2019/20 will be deployed.

2.0 Capital Programme Process

On 28th February 2019, Council approved a Capital Maintenance allocation of £4m for the Authority's building portfolio plus a further £700k for the Social Services asset portfolio.

3.0 Objectives of Scheme

- 3.1 The proposals set out will directly support the corporate objectives of the Authority, in relation to the maintenance and improvement of the Authority's building portfolio.
- 3.2 This maintains the previous commitment to address the significant backlog of maintenance and minimise the potential effect of unforeseen breakdowns of building elements.
- 3.3 As was reported in previous building maintenance programme reports, attention needs to be drawn to the fact that the Authority still has a significant backlog of maintenance and whilst there have been some reductions in this backlog, the limited programme contained within the 2019/20 budget, whilst being very important, will not remedy the immediate backlog.

Notwithstanding the current financial pressures, further budget provisions will therefore need to be made in subsequent years to maintain this investment and minimise the risks of failure and unplanned closures.

- 3.4 The list of identified schemes (**Appendix A**) has been selected on a priority basis. The criteria for selection (unless otherwise stated) was based upon Condition rating as independently determined by the recently completed, externally commissioned, condition surveys, Legislative compliance, Health and Safety implications, likelihood of failure and business continuity. Whilst all schemes have been selected on these criteria there are a number of similar priorities which we are unable to progress within the budgets available.

4.0 Description of Schemes

- 4.1 The recommended list of schemes is included in **Appendix A** and to assist, a brief summary of the planned works have been included as follows:-

1a) **Statutory Compliance - Electrical**

The schemes listed consist of total rewires, partial rewires or upgrades to ensure safety and compliance with electrical regulations and maintained operation of the premises.

- 1b) **Mechanical/Heating Schemes**
The schemes listed in this section deal with the avoidance of heating failures within our establishments on a prioritised basis.
- 1c&1d) **Statutory Compliance - Legionella and Asbestos**
As a result of the existing policy to enable compliance with the legionella and asbestos legislation, capital repairs arising out of risk assessments and surveys need to be carried out to maintain compliance. These upgrades are actioned throughout the year and therefore a list of schemes cannot be prepared in advance. Separate revenue monies have been set aside to deal with the ongoing management process and minor repairs.
- 1e) **Statutory Compliance – Radon**
Further to the Welsh Government’s directive for an awareness programme of RADON in schools, and in line with the “Ionising Radiations regulations 1999”.
- Welsh Government produced a directory of all schools that require testing for Radon; currently we have completed testing in all schools in the high risk areas. There is a need to carry out further testing within the remaining schools.
- 1f) **Statutory Compliance – Glazing Regulations**
Following Notice served by the Health and Safety Executive, money was set aside for 2006/07 to allow safety filming of relevant glazing within schools. Following the completion of these works the Authority was advised by the HSE that it needs to demonstrate its ongoing commitment relating to all of its remaining buildings and the allocation for 2019/20 will allow this process to continue.
- 1g) **Statutory Compliance – Accessibility for Disabled People**
Consultation through Local Access Groups would determine required investment to the prioritisation of buildings within the available budget for 2019/20.
- 2) **Essential Building Repairs**
The schemes listed in **Appendix A** are a combination of prioritised schemes and allowances linked to the ongoing maintenance strategy.
- 2a) **Essential Repairs to Listed Buildings**
In line with the Listed Buildings Strategy agreed by Cabinet on the 6th January 2014, Building Services will liaise with planning officers and ensure that the available budget will continue a programme dealing with the Authority’s listed assets on a prioritised basis.

- 3) **Drainage Works to Schools**
Previous allocations have been made to initiate a programme of drainage surveys to all of the Authority's Schools. This has identified a range of significant repairs which, if rectified, should assist the Authority in mitigating future structural failures and health and safety issues within the Schools. Minor repairs should be undertaken by Schools in line with their delegated budget.
- 4) **Energy/Sustainability Investment/Carbon Reduction Commitment**
The budget for 2019/20 will allow the extension of good practice measures to reduce the Council's energy use and carbon emissions. The planned programme of works will help deliver on the Council's Carbon Reduction Strategy approved by Cabinet on the 17th November 2011 and help mitigate the Authority's financial obligation within the Carbon Reduction Energy Efficiency Scheme (CRC). The energy strategy identifies within its action plan a number of feasibility studies, which will help explore future technologies. The appointment of appropriate consultants will help inform the feasibility studies, which in turn will inform our future strategies.
- 5) **Fire Risk Assessments**
The Council is required to undertake Fire Risk Assessments as dictated by *The Regulatory Reform (Fire Safety) Order 2005*. Mid & West Wales Fire Service (M&WWFS) who are responsible for the enforcement of general fire safety legislation to include *The Regulatory Reform (Fire Safety) Order 2005*.
- A joint approach now takes place with M&WWFS who inspect council owned assets and at times can highlight a number of measures that require attention in relation to fire safety. It is difficult to quantify the scale of works required; therefore a budget will be allocated and monitored accordingly in line with prioritised actions.
- 6) **Emergency Reserve Fund**
This limited fund will allow immediate response to potential building failure to avoid significant disruption, Health and Safety risk or closure. This is a limited amount which will be allocated on a priority basis throughout the year and therefore individual schemes are not listed.
- 7) **Match Funding**
The Capital Maintenance programme has previously included an element for match funding capital projects within schools. This has allowed the Authority to develop a joint and consistent approach in dealing with the maintenance backlog problem

within our Education Portfolio by pooling resources or projects where “liability” under the division of responsibilities is ambiguous. This works with schools using their devolved maintenance allocation, thus allowing more significant repairs to be undertaken. The programme over previous financial years has been highly successful. Whilst the funding pressures on schools are also recognised, it is proposed that during 2019/20 a further allocation is made to match fund medium value projects.

- 8) **Preliminary Design**
This limited budget will allow initial design to commence for schemes likely to feature in 2020/21, which will in turn inform the future work programme, allowing early procurement and maximum spend against profile.

- 9) **Asset Management Plan**
There are a number of Service Assets with projects that would need to factor within the 2019/20 allocated budget. Proposed investment within any of the affected assets will be undertaken in line with emerging priorities as part of the service rationalisation and Service in the Community strand.

To that end a modest capital allocation has been accounted for within the 2019/20 Capital Maintenance allocated budget.

The budget will be utilised to support priority works within the established post-commissioning review outcomes.

- 10) **Local Toilet Strategy**
The Council is required by legislation to develop a Local Toilet Strategy which needs to be in place by 31st May 2019. Whilst this doesn't require the Council to provide or maintain toilets directly, it would seem appropriate to ensure that an allowance is contained within the capital programme to carry out such improvements that arise out of the strategy. As such, an allocation has been included within the 19/20 programme with specific schemes being developed in line with the emerging action plan.

- 11) **Social Services Asset Investment**
Following a review of the Social Services Asset Portfolio, a capital budget has been allocated to deal with priority issues and backlog maintenance. The budget will facilitate feasibility studies, which will then in turn determine the priority areas for investment.

4.2 QEd Programme/Social Services Assets

- 4.2.1 The proposed list of schemes listed under **Appendix A** is based on the technical assessment of the individual establishments, resulting in the prioritised listing attached. However consultation has taken place with Education colleagues to confirm that none of the suggested schemes will conflict with the Authority's proposed Band B programme.
- 4.2.2 Consultation has also taken place with Social Services colleagues in relation to the projects to be included within the £700k capital maintenance budget for Social Services assets.

5.0 Equality and Engagement Implications

- 5.1 The Council is subject to the Public Sector Equality Duty (Wales) and must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.

Our Equality Impact Assessment process ensures that we have paid due regard to the above.

- 5.2 An EIA has been carried out for this project and is attached as **Appendix B**. The impact has been determined as low priority and as such, a full EIA is not required at this stage. The Capital maintenance investment within building assets and social services assets in Swansea will help to realise a more sustainable asset portfolio for Swansea Council. Where relevant, each specific project for which funding is agreed will be screened for an Equality Impact Assessment.

6.0 Financial Implications

6.1 Capital

The total capital cost of the schemes in the Authority's Buildings Portfolio amount to £4 million capital maintenance and will be fully funded by the Authority's own resources (Welsh Government Grant/Supported Borrowing). Details are set out in **Appendix C**.

- 6.2 The total capital cost of the schemes in the Social Services Asset Portfolio amount to £700k capital maintenance and will be fully funded by the Authority's own resources (Unsupported Borrowing). Details are set out in **Appendix D**.

6.3 Revenue

Maintenance costs will be met from existing revenue budgets.

7.0 Staffing Implications

7.1 Elements of the design and works will be procured externally to supplement in-house resources although the first call will be to seek interest from neighbouring Authorities.

8.0 Procurement

8.1 The 2019/20 Capital Maintenance projects identified within **Appendix A** of this report will therefore be delivered by a combination of in-house resources, with other projects procured in line with Contractual Procedural Rules. Any externalised works will be procured in accordance with Contract Procedure Rules (CPRs) and procurement rules and regulations.

9.0 Legal Implications

9.1 As indicated in Paragraph 4 of the Report, the Council must comply with various statutory requirements as well as general obligations under the Occupiers Liability Acts.

Background Papers:

None

Appendices:

Appendix A: Capital Maintenance Budget 2019/20 – Proposed Programme

Appendix B: EIA Screening Form

Appendix C: Financial Implications Summary – Building Services

Appendix D: Financial Implications Summary – Social Services

CAPITAL MAINTENANCE BUDGET 2019/20

	Building Services Overall Budget (£4m) £000's	Social Services Overall Budget (£700k) £000's
<u>PROPOSED PROGRAMME</u>		
1 <u>STATUTORY COMPLIANCE WORKS</u>		
1a <u>ELECTRICAL SCHEMES</u>		
Pontardulais Comprehensive - Electrical Installation upgrade Phase 2 of 5	75	
Swansea Market Phase 3 of 3	30	
Townhill Primary - Electrical Installation upgrade Phase 2 of 4	55	
Cwmglas Primary Phase 1 of 2	80	
Birchgrove Comp Fire Alarm Phase	130	
YGG Pontybrenin	70	
Bishopston Primary Rewire	100	
Gowerton Comp Fire Alarm 4 of 4	65	
Emergency Lighting upgrades [Various Primary Schools]	50	
Lightning Conductor upgrades [Various Primary Schools]	50	
BrynTawe Lift	90	
1b <u>MECHANICAL SCHEMES</u>		
Upgrading pneumatic valves in plant rooms Civic Centre Phase 1 of 2	20	
Penyrheol Primary - Boiler House Refurbishment	100	
Grange Primary - Boiler House Refurbishment	200	
Cwmglas Primary - Boiler House Refurbishment	140	
Gors Primary - Radiator heating circuits Refurb Phase 2 of 3 inc B/House	200	
Pennard Primary - Radiator heating circuits Refurb Phase 1 of 2	85	
Air Con Refurbishment	40	
Kitchen/Gas/Ventilation	80	
External Water Mains Replacement	40	
Swimming Pools Upgrades	30	
1c <u>LEGIONELLA</u>		
Legionella Works	50	
1d <u>ASBESTOS</u>		
Asbestos Removal	50	
1e <u>RADON</u>		
Monitoring of Radon	10	
1f <u>GLAZING REGULATIONS</u>		
Filming/Re-glazing Works	20	
1g <u>DDA</u>		
DDA Works	40	
2 <u>ESSENTIAL BUILDING REPAIRS</u>		
St Helens Primary Dry Rot Phase 1 of 2	50	
Portmead Primary Roof Replacement Phase 4 of 5	85	
Clase Primary Roof Replacement Phase 5 of 6	85	
Penclawdd Primary Roof Replacement Phase 3 of 3	85	
Gwrosydd Primary Roof Replacement Phase 3 of 8	85	
Birchgrove Primary Roof Replacement Phase 3 of 8	85	
Terrace Road Primary Fabric Repairs Phase 1	80	
Trallwn Primary School Roofing Phase 1	70	
Pontarddulais Comprehensive Roof Replacement Phase 3 of 6/7	85	
Gorseinon General issues with building fabric	20	
Pontarddulais Primary Roof Replacement	70	
Ysgol Cwm Roof Replacement Phase 1 of 2	50	
Danygraig Primary Roof Replacement Phase 1 of 2	50	
2a <u>ESSENTIAL REPAIRS TO LISTED BUILDINGS</u>		
General repairs to Listed Buildings	40	
3 <u>DRAINAGE WORKS TO SCHOOLS</u>		
Drainage Repairs to Schools	40	
4 <u>ENERGY/SUSTAINABILITY INVESTMENT</u>		
Energy/Sustainability Works	50	
5 <u>FIRE RISK ASSESSMENT</u>		
Fire Risk Assessment Works	220	
6 <u>EMERGENCY FUND FOR URGENT REPAIRS</u>		
Emergency Fund Works	475	
7 <u>MATCH FUNDING</u>		
Match Funded Works	200	
8 <u>PRELIMINARY DESIGN</u>		
Preliminary Design Works	70	
9 <u>ASSET MANAGEMENT PLAN</u>		
	30	
10 <u>LOCAL TOILET STRATEGY</u>		
Allowance for Local Toilet Strategy	75	
11 <u>SOCIAL SERVICES ASSETS</u>		
Various Backlog Maintenance Projects		660
Bonymaen HFA Phase 2 of 2		40
CM BUDGET 2019/20 TOTAL	4000	700

Equality Impact Assessment Screening Form – Appendix B

Please ensure that you refer to the Screening Form Guidance while completing this form. If you would like further guidance please contact your directorate support officer or the Access to Services team (see guidance for details).

Section 1

Which service area and directorate are you from?

Service Area: Building Services/Social Services

Directorate: Place/People

Q1(a) WHAT ARE YOU SCREENING FOR RELEVANCE?

Service/ Function	Policy/ Procedure	Project	Strategy	Plan	Proposal
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) Please name and describe below

Capital Maintenance works programme 19/20 - To agree the schemes to be funded through the Capital Maintenance programme

Q2(a) WHAT DOES Q1a RELATE TO?

Direct front line
service delivery

(H)

Indirect front line
service delivery

(M)

Indirect back room
service delivery

(L)

(b) DO YOUR CUSTOMERS/CLIENTS ACCESS THIS...?

Because they
need to

(H)

Because they
want to

(M)

Because it is
automatically provided to
everyone in Swansea

(M)

On an internal
basis
i.e. Staff

(L)

Q3 WHAT IS THE POTENTIAL IMPACT ON THE FOLLOWING...

	High Impact (H)	Medium Impact (M)	Low Impact (L)	Don't know (H)
Children/young people (0-18) →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Any other age group (18+) →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or (non-)belief →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Welsh Language →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Poverty/social exclusion →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers) →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Community cohesion →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4 HAVE YOU / WILL YOU UNDERTAKE ANY PUBLIC CONSULTATION AND ENGAGEMENT RELATING TO THE INITIATIVE?

YES

NO

(If NO, you need to consider whether you should be undertaking consultation and engagement – please see the guidance)

If yes, please provide details below

Equality Impact Assessment Screening Form – Appendix B

Q5(a) HOW VISIBLE IS THIS INITIATIVE TO THE GENERAL PUBLIC?

High visibility <input type="checkbox"/> (H)	Medium visibility <input type="checkbox"/> (M)	Low visibility <input checked="" type="checkbox"/> (L)
---	---	---

(b) WHAT IS THE POTENTIAL RISK TO THE COUNCIL'S REPUTATION?
(Consider the following impacts – legal, financial, political, media, public perception etc...)

High risk <input type="checkbox"/> (H)	Medium risk <input type="checkbox"/> (M)	Low risk <input checked="" type="checkbox"/> (L)
---	---	---

Q6 Will this initiative have an impact (however minor) on any other Council service?

Yes No **If yes, please provide details below**
 Programme relates to Building Capital Maintenance Works

Q7 HOW DID YOU SCORE?
Please tick the relevant box

MOSTLY H and/or M → **HIGH PRIORITY** → EIA to be completed
 Please go to Section 2

MOSTLY L → **LOW PRIORITY / NOT RELEVANT** → Do not complete EIA
 Please go to Q8 followed by Section 2

Q8 If you determine that this initiative is not relevant for a full EIA report, you must provide adequate explanation below. In relation to the Council's commitment to the UNCRC, your explanation must demonstrate that the initiative is designed / planned in the best interests of children (0-18 years). For Welsh language, we must maximise positive and minimise adverse effects on the language and its use. Your explanation must also show this where appropriate. The report sets out prioritisation works to commit the Council's £4.7m Building Capital Maintenance Programme and as such, does not impact on any frontline service delivery.

Section 2

NB: Please email this completed form to the Access to Services Team for agreement before obtaining approval from your Head of Service. Head of Service approval is only required via email – no electronic signatures or paper copies are needed.

Screening completed by:
Name: Nigel Williams
Job title: Head of Building Services
Date:
Approval by Head of Service:
Name: Nigel Williams
Position: Head of Building Services
Date:

Please return the completed form to accesstoservices@swansea.gov.uk

APPENDIX C - £4m Capital Maintenance

FINANCIAL IMPLICATIONS : SUMMARY

Portfolio: PLACE

Service : BUILDING SERVICES

Scheme : CAPITAL MAINTENANCE BUDGET FOR SCHOOLS - BUILDINGS 2019/20

Head of Service: BUILDING SERVICES

1.1. CAPITAL COSTS

	2019/2020	2020/2021	2021/2022	2022/2023
	£'000	£'000	£'000	£'000

EXPENDITURE

Capital Maintenance

Stat Compliance - Electrical works	795			
Stat Compliance - Mechanical works	745			
Air Con	40			
Kitchen/Gas/Ventilation	80			
External water mains	40			
Swimming pools	30			
Legionella	50			
Asbestos	50			
Glazing Regulations	20			
DDA	40			
Radon	10			
Building Repairs (Inc. Listed Buildings)	940			
Drainage	40			
Energy/Sustainability Investment	50			
Fire Risk Assessment	220			
Emergency Fund for Urgent Repairs	550			
Match Funding	200			
Preliminary Design	70			
Asset Management Plan	30			
Care Homes Backlog Maintenance				

EXPENDITURE

	4,000	0	0	
--	--------------	----------	----------	--

Financing

Welsh Government Grants/Supported Borrowing	4,000			
---	--------------	--	--	--

FINANCING

	4,000			
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1.2. REVENUE COSTS

	2019/2020	2020/2021	2021/2022	FULL YEAR
	£'000	£'000	£'000	£'000

Service Controlled - Expenditure

To be met by existing budgets				0
-------------------------------	--	--	--	---

NET EXPENDITURE

	0	0	0	0
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APPENDIX D: £700k SOCIAL SERVICES ASSETS

FINANCIAL IMPLICATIONS : SUMMARY

Portfolio: PEOPLE
 Service : SOCIAL SERVICES
 Scheme : CAPITAL MAINTENANCE BUDGET FOR SOCIAL SERVICES ASSETS - 2019/20

1.1. <u>CAPITAL COSTS</u>	2019/2020	2020/2021	2021/2022	2022/2023
	£'000	£'000	£'000	£'000
<u>EXPENDITURE</u>				
Capital Maintenance				
Various Backlog Maintenance Projects	660			
Bonymaen HFA Phase 2 of 2	40			
EXPENDITURE	700	0	0	
<u>Financing</u>				
Unsupported Borrowing	700			
FINANCING	700			
1.2. <u>REVENUE COSTS</u>	2019/2020	2020/2021	2021/2022	FULL YEAR
	£'000	£'000	£'000	£'000
<u>Service Controlled - Expenditure</u>				
To be met by existing budgets				0
NET EXPENDITURE	0	0	0	0

Agenda Item 15.



Report of the Cabinet Member for Environment and Infrastructure Management

Cabinet - 21 March 2019

FPR 7 Capital Allocation to Highway Infrastructure Assets 2019-20

Purpose:	To confirm the Capital Work Programme for highway infrastructure assets.
Policy Framework:	The Revenue and Capital budget as reported to and approved by Council on 28 th Feb 2019.
Consultation:	Access to Services, Finance, Legal.
Recommendation(s):	It is recommended that: 1) The proposed allocations, together with the Financial Implications set out in Appendix A, are approved and included in the Capital Programme. 2) Authority is delegated to the Head of Service for Highways and Transportation in conjunction with the Cabinet Member for Environment and Infrastructure Management to prioritise, finalise and allocate funding to those schemes included within the scope of this report but not specifically referred to.
Report Authors:	Bob Fenwick/Stuart Davies
Finance Officer:	Ben Smith
Legal Officer:	Debbie Smith
Access to Services Officer:	Rhian Miller

1. Introduction

- 1.1 At its meeting of 28th Feb 2019, Council approved the Revenue and Capital Budget for 2019/20. The Capital budget included an allocation of £3.375m for highway and infrastructure assets.

- 1.2 An allocation of £1.4m has been received to help tackle the backlog of highway maintenance based on the evidence in the commissioning report.
- 1.3 In addition to internal funding the Welsh Government allocated £1.186761m as a Capital Grant to assist with the backlog of outstanding highway works allocated to 18/19. As the expenditure has to be committed in the 18/19 financial year, this will result in the council substituting completed schemes and swapping the CCS funding into 2019/2020 to carry out a list of projects

2. Capital Programme

- 2.1 The City and County of Swansea's infrastructure is in need of significant investment and there is a significant backlog of works. The Authority is continuing to develop programmes of work to the principals agreed at the all Wales Asset Management Project. This will ensure spending is targeted based on a whole life cost approach which will minimise financial and service demands.
- 2.2 The Authority looks at different methods of repair and uses assessment methods agreed across Wales to evaluate the effect on network condition based on a mix of preventative, reactive and planned maintenance works. The core funding is allocated to the highway capital programme. The programme for 2015-20 was developed with these principals and is published. A new programme for 21-25 is being prepared.
- 2.3 **Scheme Selection Process**
Any additional funding will allow reactive prioritisation of additional schemes. These will be selected on the same asset management approach used to produce the forward works programme. There will be a split of approximately 60/40 between corrective work (resurfacing a road in poor condition) and preventative work (extending the life of a road in average condition).

Carriageway schemes will be selected based on a review of factors such as network importance, condition, network use and likely deterioration. A score for each assessed road will be calculated and the highest scoring schemes will be programmed. This prioritisation will be balanced by the need to give cost effective packages of work of similar types (for instance, surface dressing requires a minimum quantity of work to be cost effective when considering site set up costs). A similar process is being developed for footway schemes however, at present prioritisation is based on condition alone. Delegated authority is sort for the Head of service, in conjunction with the Cabinet Member for Environment and Infrastructure Management to agree the prioritisation method.

3. Key Proposals

Total Investment this year is approximately £5.962m. This includes the £3.375m annual allocation, additional £1.4m internal funding and £1.186761m Welsh Government Grant funding in response to the identified backlog of repairs required on Swansea's Highways. It is critical to ensure that investment in the highway network is sustained in future years to minimise future deterioration.

4. £3.375m Infrastructure Allocation.

The core allocation will be allocated with the following priorities.

4.1 Carriageways:

A steady state figure calculated to stop further deterioration of carriageways alone is £6m per annum with a backlog at over £54m (2015). This is will be reviewed during 2019 and is expected to rise. This allocation funds the 5 year programme of works. This year is the last year of the current programme for 2015-20 and is available at <http://www.swansea.gov.uk/highways>. There may be some minor changes to this programme during the year as schemes may have been brought forward or pushed back for example to coordinate with utility works. It is anticipated that the programme will be completed on schedule.

4.2 The PATCH programme of minor resurfacing works which is complimentary to the main carriageway resurfacing programme will continue on a ward by ward basis.

4.3 There is a significant backlog of works to refurbish footways. This also remains a concern as the issue is reflected in the level of third party claims for trip and falls. The list of schemes planned is included in the published programme for 2015-20. The detail of the proposed schemes can be accessed at <http://www.swansea.gov.uk/highways>. This programme is ahead of schedule and once complete additional schemes will be prioritised.

4.4 There are significant funding challenges for maintaining the bridges as there are 147 bridges, 48 culverts, 11 subways and 3 gantries within highway ownership. The programme to update bridges has been prepared to reflect requirements on strategic routes and those where strengthening is required.

4.5 The condition of highway retaining walls continues to give cause for concern. There is a need to carry out proactive works to prevent others from failing. This budget will also in the future, pick up all retaining walls within Council ownership. There are currently 4441 retaining walls on the asset register with an approximate total length of 13.5km.

4.6 The River Tawe barrage infrastructure requires sustained investment to ensure operations associated with Marina and other waterside activities are maintained.

- 4.7 Street lighting infrastructure is still a cause for concern. A testing regime has been put in place to identify lighting columns at risk, and this resulted in a significant number of columns being removed. The majority of these have now been replaced, but further testing will identify more columns that need to be removed and replaced.
- 4.8 Longstanding works to reduce flooding on the highway will be implemented across the Authority. This will include specific works on several culverted watercourses. This element of the budget will also be used as match funding where Welsh Government funding streams are available.
- 4.9 An allocation has been made to deal with maintenance to unadopted paved and surfaced areas that are Authority owned in the public realm (non-Housing/Education). This is aligned with the move towards a “corporate ownership of assets”. Highways & Transportation will maintain these areas as problems are identified on a prioritised basis. This allocation also includes for historic but newly adopted streets and that require work to bring them to adopted standard and for life threatening emergencies on un-adopted highways.
- 4.10 The condition of the cycleway network is generally satisfactory but there are sections that are nearing or past the end of their life. An allocation for cycleway surfacing work is included.
- 4.11 A programme of works on highway safety barriers is nearing completion. The programme to repair and renew the barriers will continue for the foreseeable future but on a reactive/ as identified basis.
- 4.12 Damaged sections of the coastal defences require investment to prevent further damage and to repair ongoing damage caused by winter storms. The allocation also includes provision to investigate flood risks as identified by the Flood Risk Management Plan.

5. The £1.4m Investment To Reduce The Backlog Of Works

This will include programmes on the carriageways (£780k) footway schemes (£170k), the marina setts replacement (£100k), works to tackle skid resistance (£50k), joint repairs (£100k) and drainage/flooding improvements (£100k) junction improvements and other highway assets (100k). Schemes will be prioritised on areas of highways maintenance that give the highest concerns as described in 2.3.

6. The £1.186,761m Welsh Government Grant

This will be dedicated to programmes on the carriageways. Schemes will be prioritised on areas of highways maintenance that give the highest concerns as described in 2.3.

The detailed programme for the addition works being prepared alongside the next 5 year programme, schemes will be prioritised and included in accordance with paragraph 2.3. The full additional programme for carriageways and footways supported by the increased funding will be made available online once complete and approved by the Cabinet Member. With all highways programmes it should be noted that some variation should be expected during the year due to interferences from statutory undertakers for example.

7. Allocation

7.1 In the current year the Infrastructure funds will be allocated as follows:

Carriageway Resurfacing	£750k
Patch	£600k
Footway Renewals	£650k
Bridges and Retaining Walls	£400k
Marina & Barrage	£75k
Street Lighting Refurbishment	£250k
Drainage/Flooding Works	£400k
Unadopted Council-Owned Streets	£50k
Car Park Resurfacing and Improvements	£20k
Cycleway Surfacing	£30k
Replace Safety Barrier	£50k
Coastal Defence Works and Flood Risk Management	£50k
Advance Warning Signs	£30k
Telematics Upgrades	£20k
TOTAL	£3375.00

The additional funds to reduce the backlog will be split as follows:

Carriageway Repairs (resurfacing schemes/joint repairs/machine patching/skid resistance)	£780k
Footway Repairs (inc. Marina Setts)	£270k
Skid Resistance	£50k
Joint Repairs	£100k
Drainage Improvements	£100k
Other Highway Assets	£100k
TOTAL	£1,400K

The additional grant funding will allow Capital spends on

Carriageway Repairs (resurfacing schemes/joint repairs/machine patching/skid resistance)	£1186.761k
TOTAL	£1,186.761K

8. Equality and Engagement Implications

- 8.1 The Council is subject to the Public Sector Equality Duty (Wales) and must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.

Our Equality Impact Assessment process ensures that we have paid due regard to the above.

- 8.2 The Capital investment in Highway and related Infrastructure will assist all road users. Individual projects will be subject to the EIA process on an individual basis where required.

9. Financial Implications

- 9.1 **Capital** - The cost of the Highways and Other Infrastructure works for 2019/20 funded by the Authority's own resources amounts to £4.775m. Details are set out in **Appendix A**.
- 9.2 **Capital Grant** The Welsh Government have awarded a Grant of £1,186,761 in relation to Highways Capital Works.
- 9.3 **Revenue** - Future maintenance expenditure will be met from respective Revenue Service budgets. An effective capital investment programme will help future revenue pressures.

10. Legal Implications

- 10.1 This investment will assist the Authority in discharging its statutory duty to maintain the Public Highway. All Procurements and Contracts intended to be let in respect of the above Schemes will need to be in accordance with current UK Legislation and EU Directives as well as complying with the Council's Contract Procedure Rules.

Note: As per paragraph 1.1 approval for this report is sought pending the approval of the Capital budget at Council on the 28th Feb and that the Welsh Government Grant is signed off.

Background Papers: Highways Forward Programme of Works 2015-20 available on <http://www.swansea.gov.uk/highways>.

Appendices:

Appendix A – Financial Implications

FINANCIAL IMPLICATIONS : SUMMARY

Portfolio: PLACE

Service : HIGHWAYS AND OTHER SERVICES

Scheme : HIGHWAYS AND OTHER INFRASTRUCTURE ASSETS CAPITAL MAINTENANCE

	Memo 2016/17 £'000	Memo 2017/18 £'000	Memo 2018/19 £'000	2019/20 Capital Programme				TOTAL £'000
				2019/20 £'000	2020/21 £'000	2021/22 £'000	2022/23 £'000	
1.1. CAPITAL COSTS								
Expenditure								
Highways and Other Infrastructures								
Carriageway resurfacing	1,335	1,370	1,251	750				750
Carriageway Resurfacing - PATCH	0	0	0	600				600
Footways	650	650	650	650				650
Bridges/Retaining walls	456	400	400	400				400
Marina barrage	65	65	65	75				75
Street lighting refurbishment	250	250	250	250				250
Dropped crossings	20	20	0	0				0
Drainage works	400	400	400	400				400
Safety barriers	50	50	50	50				50
Cycle ways	30	30	30	30				30
Unadopted Council owned Streets	100	65	65	50				50
Car park resurfacing/improvements	20	20	20	20				20
Coastal Defence Works	100	100	100	50				50
Urgent Infrastructure budget	0	56	44	0				0
Advance Warning Signs	0	0	30	30				30
Telematics Upgrades	0	0	20	20				20
Invest To Save	1,000	1,000	1,000	0				0
Backlog Funding	0	0	1,400	1,400				1,400
Capital Grant	0	0	1,786	1,187				1,187
EXPENDITURE	4,476	4,476	7,561	5,962	0	0	0	5,962
Financing								
Own resources	3,476	3,476	4,775	4,775				4,775
Insurance Fund	1,000	1,000	1,000	0				0
WG Grant Funding	0	0	1,786	1,187				2,973
FINANCING	4,476	4,476	7,561	5,962	0	0	0	7,748
1.2. REVENUE COSTS								
Service Controlled - Expenditure								
Employees))						
Maintenance))						
Equipment))	to be met from	to be met from	existing budgets			
Administration))						
NET EXPENDITURE	0	0	0	0	0			0

Agenda Item 16.



Report of the Cabinet Member for Homes & Energy

Cabinet – 21 March 2019

Disabled Facilities & Improvement Grant Programme 2019/20

Purpose:	To provide details of the Disabled Facilities & Improvement Grant Programme and to seek approval to include schemes in the 2019/20 Capital Programme. To comply with Financial Procedure Rule No.7 (Capital Programming and Appraisals) - to commit and authorise schemes as per the Capital Programme.
Policy Framework:	<ol style="list-style-type: none">1. Local Housing Strategy.2. Private Sector Housing Renewal and Disabled Adaptations: Policy to Provide Assistance 2017-2022.3. Statutory declaration of the Sandfields Renewal Area approved by Cabinet on the 14th January 2014
Consultation:	Legal, Finance, Access to Services.
Recommendation(s):	It is recommended that: <ol style="list-style-type: none">1) The Disabled Facilities and Improvement Grant Programme as detailed, including its financial implications, is approved and included in the 2019/20 capital budget.
Report Author:	Darren Williams
Finance Officer:	Ben Smith
Legal Officer:	Debbie Smith
Access to Services Officer:	Catherine Window

1.0 Introduction

- 1.1 The current Private Sector Housing Renewal and Disabled Adaptations Policy was approved by Council on 22nd June 2017.

2.0 Capital Programme Process

2.1 The Disabled Facilities Grants and Improvement Grant Budget for 2019/20 of £5.2m was agreed by Council on 28th February 2019.

3.0 The Scheme

3.1 The current Policy for Private Sector Housing Renewal and Disabled Adaptations sets out the detail of various types of assistance aimed at helping home owners and tenants to carry out essential adaptations and repairs. Assistance is provided on the basis of helping residents, who are often on low incomes and/or vulnerable, carry out essential repairs and maintain independence at home. The Policy also describes the Council's approach to area based housing renewal, bringing empty homes back into use and offering loans for home repairs. In summary, types of assistance include:

- Disabled Facilities Grant (DFG) – Mandatory large scale adaptations for private home owners and tenants of private rented accommodation, for example, level access showers.
- Council House Adaptations – small and large scale adaptations for Council tenants.
- Homefix Loans – Recyclable loans for homeowners needing large repairs, for example, roof repairs and damp proofing.
- Grants for Nominations – For works to bring long term empty properties back into use. Grant is provided in exchange for nomination rights. This scheme will close at the end of 2018-19 due to limited demand and alternative funding available from Welsh Government Loans. There will however be demand from remaining applications yet to be processed in 2018-19 that will require funding in 2019-20.
- Care & Repair Western Bay Minor Adaptation Grants– Small, rapid adaptations provided for elderly and disabled residents ; Comfort, Safety, and Security Grants – Low cost, rapid repairs provided for elderly and disabled residents.
- Welsh Government Landlord Loan – previously known as Houses to Homes Loan Scheme – interest free loans to tackle empty homes. To renovate and improve properties or convert empty properties into a number of units suitable for residential accommodation. Loans to be repaid and recycled as further loans.
- Welsh Government Owner Occupier Loan – previously known as National Home Improvement Loan Scheme – interest free loans for

the repair or conversion of properties to make them safe, warm and/or secure. Loans to be repaid and recycled as further loans.

- Renewal Areas – Renewal Area funding to deliver an agreed programme of property repair and environmental improvement works in the Sandfields Renewal Area will be closing in 2018-19, however due to slippage in the programme the final improvement scheme will not be completed until May 2019 and will require funding in 2019-20. The exit strategy for the Sandfields Renewal Area includes provision of Homefix loan funding assistance to households not included in the Renewal Area programme.

4.0 Financial Implications

- 4.1 The programme for 2019/20 is shown at table 1 below and is fully funded by the General Fund and the Housing Revenue Account (HRA). Welsh Government Landlord and Owner Occupier Loans are funded by ringfenced WG funds. These loans formerly known as Houses to Homes and National Home Improvement Loan schemes have been reported separately to Cabinet on 12th November 2013 and the 18th of November 2014 respectively. The changes to these loans were reported to Council on the 21st June 2018.
- 4.2 Sandfields Renewal Area funding is required in 2019/20 due to slippage to the current improvement scheme 5. This scheme will not be completed until May 2019. Funds are also required for release of retentions at end of defects period on a number of previously completed schemes. Capital funding available for the Renewal Area in 2018/19 was £1,486,000, funded from a combination of receipts from previous area renewal energy efficiency programmes, resident contributions and general capital funds. The slippage in the programme will result in an estimated £790,000 underspend in 18-19, this will need to be carried forward into the 2019/20 programme for the reasons stated.
- 4.3 The Sandfields Renewal Area programme will be closing at the end of March 2019. An exit strategy has been developed to cater for the remaining households in later phases of the programme that will not be offered External Wall Insulation and External Repair improvements due to lower than anticipated levels of funding for the overall programme. This will include the offer of Homefix loans to eligible applicants. These loans will fund improvement works of a similar scope and specification to those undertaken to properties in the Sandfields Renewal Area programme. Capital funding of these loans in 2019/20 will come from Homefix Loan funding not utilised in 2018/19. An amount of £0.25m will be made available. If applicants do not take up the offer of these loans by the end of September 2019, remaining funds will be returned to the General Fund.
- 4.4 Due to lack of take up, the Grants For Nominations scheme will be withdrawn at the end of 2018/19. Funding of £0.133m carried forward to 2019/20 from 2018/19 is however required for current applications being

processed for approval that will not be completed by the end of 2018/19.

- 4.5 The Grants for Nominations annual funding of £0.08m is to be transferred to the Homefix Loan budget in 2019/20, increasing this budget to £0.50m. Funding to repair and reuse empty homes will still be available via the Houses to Homes budget.

Table 1 details proposed 2019/20 programme and draft programme for 2020/21.

Table 1			
SCHEMES	2018/19	Proposed 2019/20	Draft 2020/21
DFG, mini and fast track adaptations	£4,300,000	£4,300,000	£4,300,000
Tenant adaptations (HRA funded)	£2,750,000	£2,750,000	£2,750,000
Homefix Loans*	£420,000	£500,000	£500,000
Grants for Nominations**	£ 80,000	£ nil	£ nil
Care and Repair Mini Adaptation Grant	£370,000	£370,000	£370,000
Care and Repair Comfort, Safety, Security	£ 30,000	£ 30,000	£ 30,000
Sandfields Renewal Area***	£nil	£nil	£nil
TOTAL PROGRAMME	£ 7,950,000	£7,950,000	£7,950,000
Funded as follows:			
Total general funded	£5,200,000	£5,200,000	£5,200,000
Total HRA funded	£2,750,000	£2,750,000	£2,750,000
Homefix loans * : carry forward £250,000 of estimated Homefix underspend in 18/19 of £674,000 into 19/20 to fund Homefix loans assistance in Sandfields as part of exit strategy arrangements.			
Grants for Nominations** : carry forward estimated underspend in 18/19 of £133,000 into 19/20 to fund remaining pipeline applications following closure of scheme.			
Sandfields Renewal Area *** : carry forward estimated underspend in 18/19 of £790,000 into 19/20 to fund remaining scheme in progress and release of end of defects retentions on completed schemes following closure of Renewal Area.			
Total funding	£7,950,000	£7,950,000	£7,950,000

4.6 Revenue running costs for 2019/20 are estimated at £1,560,900 and are met from fees of £1,401,000 generated from administering grants. The balance is met from a contribution of £159,900 from the General fund. There are no asset rent charges.

5.0 Equality and Engagement Implications

5.1 The Council is subject to the Public Sector Equality Duty (Wales) and must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Our Equality Impact Assessment process ensures that we have paid due regard to the above.

5.2 An EIA Screening Form has been completed with the agreed outcome that a full EIA report was not required. The Screening Form is included in the appendices as a background paper.

6.0 IT/Systems Implications

None

7.0 Legal Implications

7.1 The schemes detailed are in line with local authority powers to provide assistance, contained in the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 and the Councils published Policy.

7.2 The Council will need to ensure that it complies with any terms and conditions attached to any Welsh Government grant funding.

7.3 All works and services undertaken to deliver any scheme will need to be procured in accordance with the Council's Contract Procedure Rules and European procurement legislation as appropriate.

Background Papers:

Private Sector Housing Renewal and Disabled Adaptations Policy to Provide Assistance 2017-2022
EIA Screening Form

Appendices:

None.