

**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](mailto:acesstoservices@swansea.gov.uk).**

<b>Where do you work?</b>
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 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 29<sup>th</sup> November 2018.  
UPDATED FOLLOWING THE STATUTORY NOTICE PERIOD ON 23<sup>rd</sup> 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**

	<b>2015-2016</b>	<b>2016-2017</b>	<b>2017-2018</b>
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%

<b>Need</b>	<b>School Action</b>	<b>School Action Plus</b>	<b>Statement</b>	<b>Total</b>
<i>Attention Deficit Hyperactivity Disorder</i>	0	2	0	<b>2</b>
<i>Autistic Spectrum Disorders</i>	0	1	0	<b>1</b>
<i>Behavioural, Emotional &amp; Social Difficulties</i>	0	2	0	<b>2</b>
<i>Dyscalculia</i>	0	0	0	<b>0</b>
<i>Dyslexia</i>	0	0	0	<b>0</b>
<i>Dyspraxia</i>	0	0	0	<b>0</b>
<i>General Learning Difficulties</i>	4	1	0	<b>5</b>
<i>Hearing Impairment</i>	0	1	0	<b>1</b>
<i>Moderate Learning Difficulties</i>	0	1	0	<b>1</b>
<i>Multi-Sensory Impairment</i>	0	0	0	<b>0</b>
<i>Physical and Medical Difficulties</i>	0	0	0	<b>0</b>
<i>Profound &amp; Multiple Learning Difficulties</i>	0	0	0	<b>0</b>
<i>Severe Learning Difficulties</i>	0	0	0	<b>0</b>
<i>Speech, Language and Communication Difficulties</i>	2	1	0	<b>3</b>
<i>Visual Impairment</i>	0	0	0	<b>0</b>
<b>Total</b>	<b>6</b>	<b>9</b>	<b>0</b>	<b>15</b>

None of the learners in Craigcefnparc Primary Schools currently have a Statement of Educational Need.

	<b>Stage A-C</b>	<b>Stage A-D</b>	<b>Stage A-E</b>
Percentage with English as an Additional Language (EAL)	0%	0%	3.6%

<b>Ethnic Background</b>	<b>Reception</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>	<b>Year 6</b>
Non White British	0.0%	0.0%	0.0%	0.0%	12.5%	0.0%	12.5%

### Clydach Primary School Pupils

	<b>2015-2016</b>	<b>2016-2017</b>	<b>2017-2018</b>
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%

<b>Need</b>	<b>School Action</b>	<b>School Action Plus</b>	<b>Statement</b>	<b>Total</b>
<i>Attention Deficit Hyperactivity Disorder</i>	0	1	0	<b>1</b>
<i>Autistic Spectrum Disorders</i>	0	0	3	<b>3</b>
<i>Behavioural, Emotional &amp; Social Difficulties</i>	1	7	0	<b>8</b>
<i>Dyscalculia</i>	0	0	0	<b>0</b>
<i>Dyslexia</i>	0	0	0	<b>0</b>
<i>Dyspraxia</i>	0	0	0	<b>0</b>
<i>General Learning Difficulties</i>	19	10	0	<b>29</b>
<i>Hearing Impairment</i>	0	1	0	<b>1</b>
<i>Moderate Learning Difficulties</i>	19	4	2	<b>25</b>
<i>Multi-Sensory Impairment</i>	0	0	0	<b>0</b>
<i>Physical and Medical Difficulties</i>	1	2	0	<b>3</b>
<i>Profound &amp; Multiple Learning Difficulties</i>	0	0	0	<b>0</b>
<i>Severe Learning Difficulties</i>	0	0	1	<b>1</b>
<i>Speech, Language and Communication Difficulties</i>	1	8	3	<b>12</b>
<i>Visual Impairment</i>	0	0	0	<b>0</b>
<b>Total</b>	<b>41</b>	<b>33</b>	<b>9</b>	<b>83</b>

There are currently 9 pupils at Clydach Primary School who have a Statement of Educational Need.

	<b>Stage A-C</b>	<b>Stage A-D</b>	<b>Stage A-E</b>
Percentage with English as an Additional Language (EAL)	3.7%	3.7%	4.1%

<b>Ethnic Background</b>	<b>Reception</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>	<b>Year 6</b>
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**

<b>Community Aspect</b>	<b>Current</b>	<b>Impact Assessment</b>
<b>Community Services Provided by the school</b> (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>
<b>Facilities Accommodated by the School</b> (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) – 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.

(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 Criagcefnparc 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. 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.

(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.

(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.

(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 Craigeffnparc Primary School
- pupils, staff, governors and parents at Clydach Primary School (proposed as the new school for the Craigeffnparc 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)	Craigeffnparc School	18/09/18	14:30-15:30	12
Staff	Craigeffnparc School	18/09/18	15:30-16:15	7
Governors	Craigeffnparc School	18/09/18	16:15-17:00	6
Drop-in for parents/public	Craigeffnparc School Hall	18/09/18	17:00-19:00	38
Drop-in for parents/public	Craigeffnparc Community Hall	20/09/18	11:00-14:00	16
Drop-in for	Craigeffnparc	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 Craigeffnparc 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 Craigeffnparc 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 Craigeffnparc pupils. Friends would be in the school but not necessarily in the same class, as Craigeffnparc 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 Craigeffelen and Glais.

**Facilities and opportunities** – the Craigeffnparc 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 Craigeffnparc. 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

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

**Please explain any possible impact on each of the above.**

Impact on...
<b>Foster good relations between different groups</b>
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.
<b>Advance equality of opportunity between different groups</b>
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.
<b>Elimination of discrimination, harassment and victimisation</b>
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).

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](mailto: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 <sup>st</sup> June 2018	Cabinet approval to consult	Completed
Carry out statutory consultation	Head of Service Head of Funding and Information Unit	18 <sup>th</sup> 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 <sup>th</sup> 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 <sup>st</sup> March 2019	Report prepared and decision taken by Cabinet	

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