

PEMBROKESHIRE COUNTY COUNCIL
Cyngor Sir Penfro



CHILDREN & SCHOOLS

REGULATED ALTERATION TO MILFORD HAVEN SCHOOL

**Introduction of Learning Resource Centre
for pupils with Complex Learning Needs and
Autistic Spectrum Condition (ASC)**

CONSULTATION DOCUMENT

JUNE 2019

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Foreword

Pembrokeshire County Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. Having the right schools of the right type in the right places and ensuring that they are fit for our 21st century learners is a challenge facing us, and all councils across Wales.

Meeting this challenge involves reviewing the number and types of school the Council has in its area, and assessing whether or not best use is being made of its resources and facilities.

The Council reviews its provision on the basis of:

- Quality and future sustainability of educational provision
- Sufficiency and accessibility of school places
- The condition, suitability and standard of school buildings
- Value for money

This consultation document sets out the proposal to introduce a Learning Resource Centre to Milford Haven School in order to accommodate pupils with complex additional learning needs and Autistic Spectrum Condition. I look forward to receiving your views.

Kate Evan-Hughes
Director for Children and Schools

1. Introduction

Pembrokeshire County Council has a statutory duty to secure sufficient and suitable school places in its area and to determine whether it is making the best use of the resources and facilities to deliver the opportunities that children deserve.

At its meeting on 9th May 2019, Pembrokeshire County Council considered a report which outlined the need to properly cater for learners with complex needs in mid Pembrokeshire. The report outlined that the excellent provision currently available in primary schools needed to be expanded to the secondary sector. The decision of Council was as follows:

That the Director for Children and Schools be authorised to undertake statutory consultation on establishing a Learning Resource Centre for pupils with Complex Learning Needs and Autistic Spectrum Condition (ASC) at Milford Haven School.

Such a proposal constitutes a regulated alteration within the context of the School Standards and Organisation (Wales) Act 2013. Consequently, this document fulfils part of the County Council's responsibility under the Act to consult with appropriate stakeholders and to explain the Council's proposal to introduce a Learning Resource Centre to Milford Haven School in order to accommodate learners with complex additional learning needs and ASC. This document offers an opportunity for consultees to put forward any comments, observations or alternative proposals they wish to be considered, as well as explaining why other options considered are not the preferred option.

Consultation on this proposal will comply with the requirements of the School Organisation Code. Consequently, the main purpose of this document is to provide information and to gather the views of identified stakeholders. For further information on the statutory process, see page 25.

2. Consultation

2.1 Who will we consult with?

The Governing Bodies, Parents/Carers/Guardians and Staff of:	
<ul style="list-style-type: none"> • Milford Haven School • Milford Haven CP School • St Francis Catholic Primary School • Gelliswick VC School • Coastlands CP School 	<ul style="list-style-type: none"> • Johnston CP School • Neyland CP School • Fenton CP School • Waldo Williams CP School
<ul style="list-style-type: none"> • Paul Davies AM – Constituency • Helen Mary Jones AM – Regional • Joyce Watson AM – Regional • Eluned Morgan AM – Regional • Neil Hamilton AM - Regional • Stephen Crabb MP • Cllr. Reg Owens • Cllr. Peter Morgan • Cllr. Ken Rowlands 	<ul style="list-style-type: none"> • Cllr. Vivien Stoddart • Cllr. Mike Stoddart • Cllr Rhys Sinnett • Cllr Stephen Joseph • Cllr. Stanley Hudson • Cllr. Guy Woodham • Cllr. Paul Miller • Cllr. Simon Hancock • Cllr. Robert Summons
<ul style="list-style-type: none"> • NUT • NASUWT • UCAC • ATL • NAHT • ASCLE • UNISON • GMB 	<p>The following Town or Community Councils:</p> <p>Milford Haven, Dale, Marloes & St Brides, St Ishmaels, Walwyns Castle, Herbrandston, Tiers Cross, Llanstadwell, Johnston, Neyland, Rosemarket, The Havens</p>
<p>Diocesan Directors of Education:</p> <ul style="list-style-type: none"> • St David's • Menevia 	<ul style="list-style-type: none"> • Hywel Dda Health Board • SNAP Cymru • National Autistic Society
The Welsh Ministers	Estyn
ERW – Regional Education Consortium	County Council transport unit
Dyfed Powys Police and Crime Commissioner	Pembrokeshire College
<ul style="list-style-type: none"> • Carmarthenshire County Council • Ceredigion County Council 	Pembrokeshire Communities First

2.2 Consultation with children and young people

The children and young people attending all the schools identified above will be able to participate in the consultation process through their School Councils. The information provided to children and young people will be presented in a way that is relevant to their age and level of likely understanding and be in accordance with the National Standards for Children and Young People's Participation. The information gathered from the consultation

with pupils will form part of the Consultation Report which will subsequently be considered by Council.

2.3 When does the consultation period start and end?

THE CONSULTATION PERIOD FOR THIS PROPOSAL WILL COMMENCE ON 17 JUNE 2019 AND ENDS ON 31 JULY 2019.

During this period you can express your views by writing to the Director for Children and Schools by using any of the following methods:

Letter to:	Mrs Kate Evan-Hughes Director for Children & Schools County Hall Haverfordwest SA61 1TP
Response Form:	See the form at the back of this document
Online:	www.pembrokeshire.gov.uk/haveyoursay

You can submit your views in favour of, or against the proposal. Responses received during the consultation period will not be treated as statutory objections. If you wish to object, you will need to do so in writing during the statutory objection period outlined in Section 7.

PLEASE NOTE THAT ALL CORRESPONDENCE SHOULD BE RECEIVED BY NO LATER THAN 5PM ON 31 JULY 2019.

2.4 What will happen after the consultation process?

At the end of the consultation period the feedback will be collated and summarised in a Consultation Report and subsequently presented to the County Council. This report will be available to be viewed on the Council website and hard copies obtainable on request from the address detailed below. Council will consider the report and decide whether it wishes to proceed with the proposal or not.

If Council decides not to proceed, that will be the end of this proposal. However, if Council decides to proceed, a Statutory Notice will be published. The Statutory Notice will be published on the Council's website and posted in the named schools and other conspicuous places within the community. Copies of the notice will be made available to the relevant schools to distribute to pupils, parents/carers and members of staff.

In accordance with The School Standards and Organisation (Wales) Act 2013, anyone wishing to make objections to the proposal will have the opportunity to do so. To be considered as statutory objections, objections will need to be made in writing or by email, and sent to the Council within 28 days of the date on which the statutory notice was published.

If objections are received, these will be summarised into an Objection Report, which will be published on the Council's website with parents/carers/guardians and staff members of the relevant schools advised of its availability. All consultees listed earlier in this section will receive hard copies of the report or be emailed a link to the relevant location on the website.

The Objection Report will subsequently be considered by Council before determining whether the proposal should proceed or not. When a decision is made, it will be published on the Council's website and all consultees informed.

2.5 Your questions

The content of this Consultation Document is likely to provide answers to the most common questions that will arise regarding the proposal. However, should you have any further questions, please contact Huw Jones on the following email address:

EducationConsultations@pembrokeshire.gov.uk

3. The Status Quo – Background

3.1 Milford Haven School

Milford Haven School is an English medium 11-19 mixed comprehensive school maintained by Pembrokeshire County Council. The school serves the town of Milford Haven and the surrounding rural area. It is located in the Milford North electoral ward, but its catchment area encompasses a large area north of the Milford Haven waterway, from Talbenny in the north west, eastwards towards Johnston and south to Neyland. The catchment area is largely rural in nature, but with significant large centres of population in Hakin, Johnston, Milford Haven and Neyland – see attached map.

23.4% of pupils are eligible for free school meals and most come from a white, British background; less than 1% of pupils speak English as an additional language. Over 28% of pupils are on the special educational needs register.

Milford Haven School receives its pupils from schools in St Ishmael's, Hakin/Hubberston and Milford Haven. However, following a reorganisation of secondary provision in Haverfordwest, both Johnston and Neyland primary schools have now become additional feeder schools.

In relation to special educational needs, there is currently no mid county secondary specialist resource base for children with complex learning needs, i.e. Haverfordwest and Milford Haven. Key stage 3 and 4 pupils currently attend a temporary provision based at the Pembrokeshire Learning Centre in Neyland. The current pupils have a wide range of learning difficulties, speech and language, social communication, anxiety, behaviour and medical conditions.

3.2 Details of the school which is the subject of the proposal

School	Category	Language Category	Age Range	School Capacity	Admission Number 2018/19
Milford Haven School, Steynton Rd, Milford Haven, SA73 1AE	Community	English Medium	11-19	1174	209

The age profile of pupils currently on roll and the figures recorded for the previous four annual school censuses are as follows:

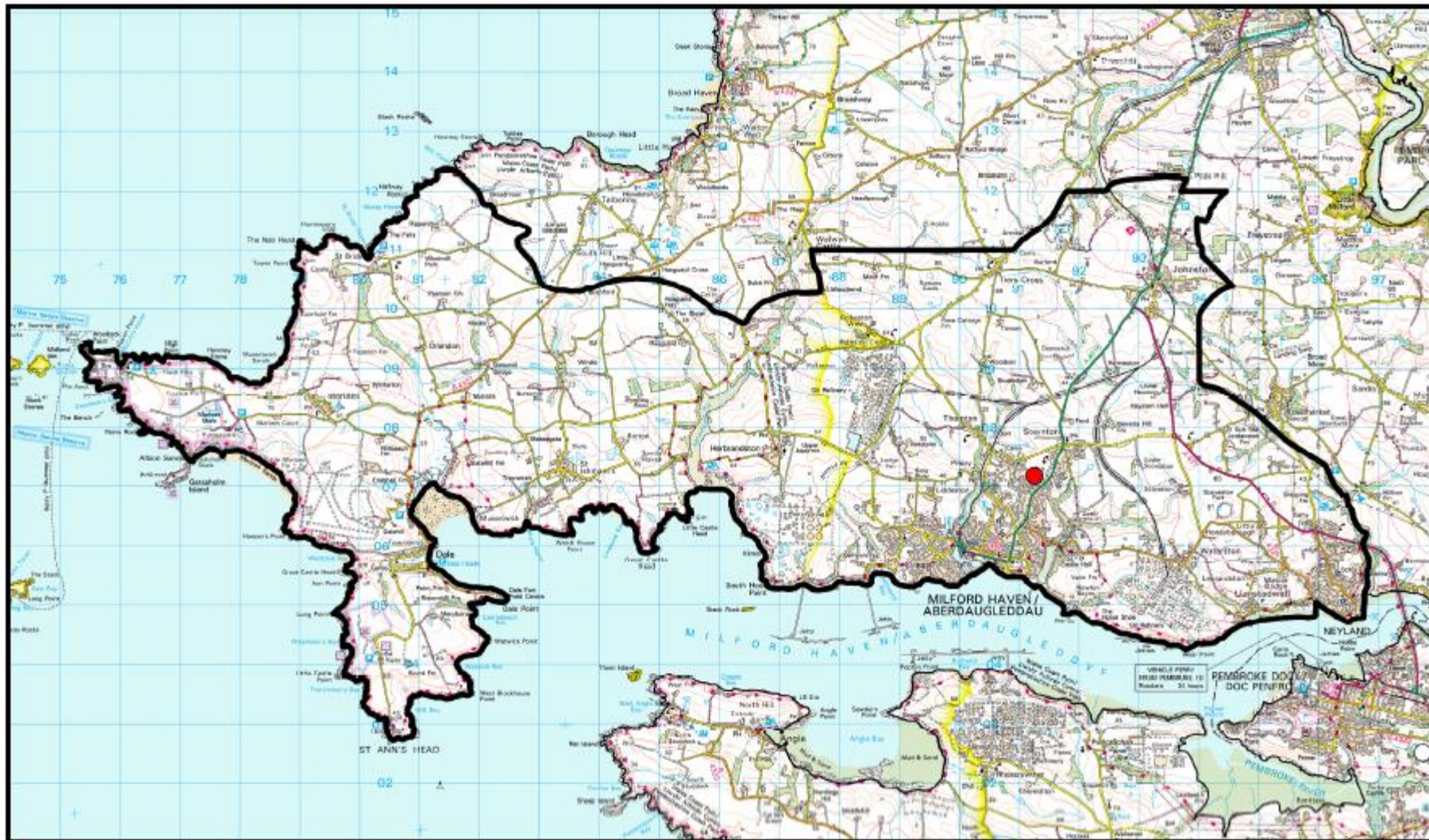
	Yr7	Yr8	Yr9	Yr10	Yr11	Yr12	Yr13	Total
Jan 2019	212	191	159	171	157	25	24	939
Jan 2018	201	157	176	167	125	36	41	903
Jan 2017	158	181	166	132	139	58	51	885
Jan 2016	179	167	127	145	152	43	56	869
Jan 2015	164	127	145	152	181	65	68	902

SCHOOL CATCHMENT AREA PLAN / CYNLLUN TALGYLCH YSGOL

(from September 2018 / o Medi 2018)

School Name / Enw'r Ysgol: Milford Haven School

School Number / Rhyf yr Ysgol: 4063



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3.3 School Capacity

Capacity is measured using the “Measuring the Capacity of Schools in Wales” formula; this excludes nursery accommodation and part time pupils. School capacities are reviewed annually and may change when a school changes the way it uses its accommodation and when building alterations take place. The current forecast in relation to pupil population compared to school capacity is shown below. The current capacity of Milford Haven School is 1174.

3.4 Pupil Forecasts

An exercise to forecast future pupil numbers is undertaken annually. In the case of secondary schools, forecasts are constructed as follows:

- i. New Year 7 is based on the number of applications for secondary places as at the national offer date of the previous 1st March;
- ii. Subsequent years are based on a broad percentage of pupils transferring from various feeder primary schools;
- iii. Forecasts of pupils progressing into the sixth form in Year 12 and going forward to Year 13 are based on a rolling average over the last 4 years.

Pupil Forecasts 2020 - 2024

	Actual	Forecast					Capacity
	2019	2020	2021	2022	2023	2024	2019
Milford Haven School	939	1023	1109	1204	1259	1350	1174

Occupancy 2020-2024

	Actual	Forecast				
	2019	2020	2021	2022	2023	2024
Milford Haven School	80%	87%	94%	102%	107%	115%

3.5 Buildings / Accommodation

The following information has been extracted from the joint Chandler/EC Harries building surveys undertaken as part of preliminary work undertaken by Welsh Government and the WLGA in relation to the 21st Century Schools Programme. The condition and suitability gradings are reviewed annually and reflect all works undertaken on schools. It is worth noting that where schools have benefitted from significant improvements, it is conceivable that the overall condition grading of the school remains unchanged. The overall condition assessment would take such improvements into consideration, but is ultimately based on the surveyor’s assessment of the building/s as a whole.

Milford Haven School was built in 1964 and was extended in 1988 following the amalgamation of Milford Haven Grammar School and Milford Haven Central School. The land and buildings are in the ownership of Pembrokeshire County Council.

The school is graded as “C” (Poor) for both condition and suitability.

3.6 Schools which may be affected by this proposal

It is considered that a number of schools in the area may be affected by this proposal. Whilst the proposal largely addresses secondary provision, it will have an impact on feeder primary schools.

School	Address
Milford Haven CP School	Priory Road, Milford Haven, SA73 2EE (Infant site) Prioryville, Milford Haven, SA73 2LQ (Junior site)
St Francis Catholic Primary School	Priory Road, Milford Haven, SA73 2EE
Gelliswick VC School	Gelliswick Road, Hakin, Milford Haven, SA73 3RS
Coastlands CP School	St Ishmael's, Haverfordwest, SA62 3SZ
Johnston CP School	Langford Road, Johnston, SA62 3PY
Neyland CP School	John Street, Neyland, SA73 1TH
Fenton CP School	Portfield, Haverfordwest, SA61 1BZ
Waldo Williams CP School	Augustine Way, Haverfordwest, SA61 1PA (Infant site) Barn Street, Haverfordwest, SA61 1TD (Junior Site)

3.7 Strengths and Weaknesses of the current situation

School	Strengths	Weaknesses
Milford Haven School	<ul style="list-style-type: none"> Pupil numbers are growing as a result of both general population growth in Milford Haven and as a consequence of catchment changes Identified as needing capital investment as part of Band B 21C Schools Programme; this will address various condition, suitability and accessibility issues as well as providing a sufficiency of school places. 	<ul style="list-style-type: none"> Pupils with complex learning needs unable to receive provision in their local mainstream secondary school Categorised in the "Red" support category in January 2019 The school was last inspected in November 2017 resulting in Estyn considering the school to be in need of significant improvement. Estyn is monitoring the school's progress. Small sixth form – only 49 pupils as at January 2019.

4. Current School Standards

In relation to the school which is the subject of this proposal, Estyn judgements, the standards being achieved and the level of support required as part of the National Categorisation are shown as follows:

4.1 Estyn Inspection

The school was last inspected in November 2017, resulting in the judgements outlined below. As a result of the inspection, the school was considered to be in need of significant improvement with Estyn undertaking to monitor the school's progress. The summary of the inspection report and recommendations are shown below and in **APPENDIX 2**, and consultees may access the full report via the Estyn website at www.estyn.gov.uk.

Inspection Area	Judgement
Standards	Adequate and needs improvement
Wellbeing and attitudes to learning	Unsatisfactory and needs urgent improvement
Teaching and learning experiences	Unsatisfactory and needs urgent improvement
Care, support and guidance	Adequate and needs improvement
Leadership and management	Adequate and needs improvement

4.2 Performance (Source: My Local School)

Summary of information & Attainment	School	LA	Wales	
			Family	Total
Free School Meals - 3 year average (FSM Group) – 2018	23.4%	15.7%	N/A	16.6%
Attendance during 2018	92.7%	93.7%	93.2%	93.9%
% Pupils at School Action (2018) When a teacher identifies that a pupil has SEN they provide interventions that are additional to or different from those provided as part of the school's usual curriculum.	11.4%	20.7%	N/A	14.4%
% Pupils at School Action + (2018) When a teacher are provided with advice or support from outside specialists, so that alternative interventions additional or different to those provided for the pupil through School Action can be put in place.	6.9%	8.3%	N/A	8.3%
% Statemented pupils (2018) A child has SEN if s/he has learning difficulties which requires special educational provision to be made for him or her. A learning difficulty means that the child has significantly greater difficulty in learning than most children of the same age or that the child has a disability that needs different facilities from those that the school generally provides for children.	1.5%	1.6%	N/A	2.3%
% Pupils where English is an Additional Language (EAL) (2018)	0.6%	0.6%	N/A	3%

Summary of information & Attainment	School	LA	Wales	
			Family	Total
% Pupils in the school recorded as having an ethnic background as anything other than "White-British"	5%	5.7%	N/A	9.8%
Pupils achieving the Level 1 threshold (2018) The volume of qualifications equivalent to the volume of 5 GCSEs at Grade A*-G	93.6%	91.8%	93.7%	93.7%
Pupils achieving the Level 2 threshold (2018) The volume of qualifications equivalent to the volume of 5 GCSEs at Grade A*-C	48%	62.4%	60.6%	67%
Pupils achieving the Level 2 threshold inclusive (L2i)(2018) The volume of qualifications equivalent to the volume of 5 GCSEs at Grade A*-C including one in English or Welsh first language and one in Mathematics.	43.2%	53.9%	49.9%	55.1%
Average capped 8 points score (2018) Calculated using the best 8 results from all qualifications approved for pre-16 use in Wales for each pupil.	298.6	309.4	312.4	324.1
Average capped 9 points score (2018) The capped 9 measure focuses on Year 11 pupils' results from 9 of the qualification available in Wales	320.3	336.1	334.4	349.5
% Pupils achieving the Skills Challenge Certificate at National or Foundation Level (2018)	85.6%	85.8%	87.3%	86.9%
% Pupils achieving the Skills Challenge Certificate at National Level (2018)	76%	70.6%	75%	73.4%
% Pupils achieving the Welsh Baccalaureate at National or Foundation Level (2018)	82.4%	83.5%	84.4%	85.3%
% Pupils achieving the Welsh Baccalaureate at National Level (2018)	40%	50%	47.9%	51.4%

4.3 National School Categorisation

The National School Categorisation System aims to provide a clear structure to review how well a school is performing. It takes into consideration how effectively a school is led and managed, the quality of learning and teaching, and the level of support and challenge it needs to do better. Following a process to determine outcome indicators and capacity to improve, each school is placed into one of four colour-coded support categories which trigger a tailored support package. Each category has been given a colour – green, yellow, amber or red. The categorisation colour shows the level of support a school needs (with schools in the green category needing the least support and those in the red category needing the most intensive support). Each school receives a tailored programme of support, challenge and intervention based on this category.

Milford Haven School is currently in the RED category.

5. The Proposal

5.1 The Proposal

The Council's proposal is as follows:

That the Director for Children and Schools be authorised to undertake statutory consultation on establishing a Learning Resource Centre for pupils with Complex Learning Needs and Autistic Spectrum Condition (ASC) at Milford Haven School.

5.1.1 The Case for Change – why is this change being proposed?

A Learning Resource Centre (LRC) is a classroom based provision within a mainstream school for pupils with complex needs. An LRC provides pupils with a broad and balanced curriculum that is highly differentiated in order to support them in achieving their full potential, and at the same time offering pupils the opportunity to be part of mainstream activities and lessons and to socialise with their peers whilst their individual needs are supported and met. Generally, LRCs are located to reduce travelling time for pupils; in mid Pembrokeshire, primary LRCs are located at the following schools: Fenton CP, Waldo Williams CP, Johnston CP and Gelliswick VC, but there is currently no secondary provision mid-county for children transitioning from Key Stage 2.

LRC provision for secondary pupils is located in three areas:

- North Pembrokeshire – based in Ysgol Bro Gwaun, Fishguard;
- South Pembrokeshire – based in Ysgol Harri Tudur, Pembroke;
- Mid Pembrokeshire – based at the Pembrokeshire Learning Centre, Neyland.

In the case of the latter, this is a temporary LRC which caters for Complex Needs learners; current pupils have a wide range of learning difficulties, speech and language, social communication, anxiety, behaviour and medical conditions. Consequently, pupils attending the LRC in Neyland do not benefit from the full range of mainstream activities and lessons enjoyed by their peers elsewhere in the county.

5.1.2 Advantages and Disadvantages of the Proposal

Introduction of Learning Resource Centre	
Advantages	Disadvantages
The proposal will address inequality of provision for mid-county pupils. Currently pupils with complex learning needs attend a temporary Learning Resource Centre which is not based within a mainstream school.	In view of increasing pupil numbers and a proposal for capital investment at Milford Haven School, the proposal cannot be implemented until construction works are complete.
The majority of learners attending primary Learning Resource Centres in the Haverfordwest and Milford Haven area live	The introduction of this provision requires compliance with the statutory school organisation process; this can be lengthy

Introduction of Learning Resource Centre	
Advantages	Disadvantages
within approximately 5 miles of Milford Haven School; similarly of those who attend the temporary provision at the Pembrokeshire Learning Centre, half live within the Milford Haven School catchment area. Consequently the school is considered to be an appropriate location.	and requires full Council approval before it can be implemented.
The level of provision in the Learning Resource Centre and the proportionate ability and skill of staff are likely to be of benefit to the wider school.	May be perceived as disadvantageous to pupils living in Haverfordwest, who would normally be expected to attend Haverfordwest High VC School.

5.1.3 Impact of the proposal

Milford Haven School
Standards and progress overall, of specific groups and in skills; wellbeing and attitudes to learning.
<p>In the Summer examinations in 2018 (key stage 4) the school's performance dropped in all performance measures. For example, the average capped points score has dropped from 334 to 323, the level two threshold including English and mathematics (L2+) has dropped from 49% to 44% and the level one threshold dropped from 96% to 94%. The scores for English, mathematics and science have dropped from 57%, 64% and 66% to 53%, 52% and 45% respectively. These scores are below local and national averages in all cases, except for L1 which is two percentage points above the local average. Performance in English and mathematics places the school in the lower 50% of similar schools while science is in the bottom 25%.</p> <p>This year the school reports that the core subjects are on track to achieve: English (62%); mathematics (60%); and science (58%). These scores would place the school in the top 25% of similar schools using this year's data.</p> <p>The school has introduced strategies to improve the standard of pupils' work (particularly in literacy and numeracy) in books. However, evidence from book scrutiny suggests that progress in this aspect is developing in consistency.</p> <p>In key stage 3 (KS3) pupils' outcomes have improved over the last three years in nearly all measures, except in science where there has been a small drop. The core subject indicator has increased from 52% to 89% between 2015-2016 to 2017-2018. However, these scores are below local and national averages in nearly all cases.</p> <p>By the end of KS3 pupils' numeracy skills have improved in many cases, although is still judged adequate. There is insufficient evidence of numeracy being used in other subjects at the appropriate level and in real life situations.</p> <p>The majority of pupils make sound progress in developing their basic reading skills and in their enjoyment of reading. However, insufficient opportunities are provided in lessons for pupils to improve their reading across a minority of subjects.</p>

<p>Pupils have more opportunities to write in lessons and this has resulted in writing being more coherent and accurate. In these lessons many pupils use a suitable range of subject specific vocabulary appropriately. However, there are insufficient opportunities to write at length in a minority of subjects.</p> <p>There are clear procedures for behaviour management. These strategies have had a positive impact on the wellbeing of pupils and are helping to develop a positive learning ethos across the school.</p> <p>In lessons, many pupils demonstrate generally positive attitudes to learning. They arrive promptly, behave well and show interest in their work. However, their general good behaviour is disrupted by those demonstrating the extreme behaviours.</p> <p>With the exception of Milford Haven School, it is unlikely that the proposal will impact on standards, wellbeing and attitudes to learning at any of the other schools likely to be affected by the proposal.</p>
<p>Quality of teaching, the breadth, balance and appropriateness of the curriculum, and the provision of skills.</p>
<p>The school's own analysis of the quality of teaching suggests that most teachers are able to teach good quality lessons when behaviour is good. The quality of teaching across the school is adequate.</p> <p>Teachers are beginning to set higher expectations and are increasingly responding to the identified weaknesses of individual pupils. However, this part of the teacher's work is still under developed and has not yet resulted in rapid improvement.</p> <p>Most teachers have developed good relationships with most pupils. However, the behaviour of a very few pupils is having a negative impact on the quality of teaching across the school. A minority of teachers are inconsistent in carrying out the school policies for behavioural management.</p> <p>Leaders have provided a range of professional development to improve the planning for the development of skills. However, the quality of planning is not consistently applied by all teachers.</p> <p>Since the last inspection the school has placed a strong focus on improving teaching and learning. Leaders have supported teachers well to increase the range of strategies to engage pupils in their learning. However, this aspect of the school's work requires further work.</p> <p>The curriculum is broad and balanced and complies with statutory requirements at all key stages.</p> <p>With the exception of Milford Haven School, it is unlikely that the proposal will impact on the quality of teaching, the breadth, balance and appropriateness of the curriculum and the provision of skills at any of the other schools likely to be affected by the proposal.</p>
<p>Tracking, monitoring and the provision of learning support, personal development and safeguarding.</p>
<p>The school monitors and tracks the general progress of individuals and groups of pupils suitably across all key stages. It makes appropriate use of this information to identify pupils who require additional academic support. The school provides a wide range of suitable interventions for these pupils. Changes to tracking and monitoring are beginning to have a positive impact on outcomes in the majority of performance indicators at the end</p>

of Year 11, but have had insufficient impact on a few important aspects such as outcomes for more able pupils.

The school supports the pupils with additional learning needs well and tracks their progress against the targets in their individual development plans suitably. These plans include useful strategies to support teaching and learning. However, there is inconsistency in how well teachers apply these strategies in lessons.

The monitoring and the holding to account of senior leaders and particularly the core subject leaders is more regular and robust. However, these strategies are not yet having sufficient impact on standards. Discussions on the progress of individual targeted pupils is yet to impact across all subjects.

The systems to listen to pupil voice are effective in listening to different groups of learners. Efforts to improve provision, so that behaviour and intervention strategies improve outcomes, continue and the school continues to work effectively with the local authority to do this.

The school's arrangements for safeguarding pupils meet requirements and give no cause for concern.

With the exception of Milford Haven School, it is unlikely that the proposal will impact on tracking, monitoring and the provision of learning support, personal development and safeguarding at any of the other schools likely to be affected by the proposal.

Quality and effectiveness of leaders and managers, self-evaluation processes and improvement planning, professional learning, and use of resources.

The headteacher has shared her vision of high standards and good behaviour. The vision is understood by staff and most pupils. The school is developing systems to make this a reality.

Since the inspection, the school has undertaken valuable work to strengthen leadership and to develop self-evaluation and planning for improvement. The new headteacher has undertaken a reorganization which has ensured that the senior leadership team is better prepared to make the necessary changes required from the 2017 inspection. However, this has resulted in most leaders being new to leadership and are developing the necessary skills on the job. Leaders are increasing in confidence to prioritise effectively.

Leaders have developed useful systems to monitor and evaluate the school's performance. There is a self-evaluation calendar for leaders at all levels to follow.

The headteacher and other invited staff report to the school's Improvement Panel providing useful information. In most aspects the school reports it is making satisfactory progress.

With the exception of Milford Haven School, it is unlikely that the proposal will impact on quality and effectiveness of leaders and managers, self-evaluation processes and improvement planning, professional learning and use of resources at any of the other schools likely to be affected by the proposal.

Likely impact of the proposals on the ability of the school to deliver the full curriculum.

The establishment of a learning resource centre will enable the school to deliver the full curriculum at all key stages to a wider range of learning without the need for specialist placements outside their local community. The proposals will enable the school to deliver a broad and balanced curriculum that meets their needs and statutory requirements. A broad and balanced curriculum is a necessity for the learners with additional needs and an LRC

<p>at the school will enable them to do so without the need for specialist placements outside the local area. The proposal will have a positive effect on standards for learners particularly those with additional needs and ensure that all learners leave the school with appropriate qualifications.</p> <p>It is unlikely that the proposal will impact on the ability of other schools likely to be affected by the proposal to deliver the full curriculum.</p>
<p>The extent to which the proposal would support the targets in the approved Welsh in Education Strategic Plan (WESP) and how the proposal would expand or reduce Welsh language provision.</p>
<p>Milford Haven School is an English medium school and the Learning Resource Centre will also be English-medium. Consequently, the proposal will not support the targets set out in the Council's Welsh in Education Strategic Plan; neither will it expand or reduce Welsh language provision.</p>

5.1.4 What are “Special Educational Needs”?

The proposal will make provision for learners with special educational needs, as defined by Section 312 (1) of the Education Act 1996, as follows:

A child has “special educational needs” if s/he has a learning difficulty which calls for special educational provision to be made for him/her. A child has a “learning difficulty” if:

- a) s/he has a significantly greater difficulty in learning than the majority of children of his/her age;
- b) s/he has a disability which either prevents or hinders him/her from making use of educational facilities of a kind generally provided for children of his/her age in schools within the area of the local authority, or
- c) s/he is under compulsory school age and is, or would be if special educational provision were not made for him/her, likely to fall within paragraph a) or b) when of that age.

A child is not to be taken as having a learning difficulty solely because the language (or form or the language) in which s/he is, or will be, taught is different from a language (or form of a language) which has at any time been spoken in his/her home.

“Special educational provision” means:

- a) in relation to a child who has attained the age of two, educational provision which is additional to, or otherwise different from, the educational provision made generally for children of his/her age in schools maintained by the local authority (other than special schools), and
- b) in relation to a child under the age of two, educational provision of any kind.

A “child” includes any person who has not attained the age of 19 and is a registered pupil at a school.

The characteristics of pupils who will attend the proposed provision is that they will have a range of Complex Learning Needs and Autistic Spectrum Condition.

5.1.5 The Impact on SEN provision

The Learning Resource Centre will be fully integrated with the mainstream provision at Milford Haven School, providing an appropriate environment in which pupils can develop and thrive among their peers and have increased access to the mainstream curriculum, where appropriate. The overall aim of the LRC provision is to provide a continuum of provision and generate and maximise opportunities for inclusion within the mainstream environment, while meeting the individual learning, emotional and social needs of children and young people identified with particular complex needs. This will be achieved by:

- Individual and group support provided by specialist staff within the LRC;
- Supported opportunities to access the range of mainstream experiences;
- Opportunities to extend self-confidence and self-esteem;
- Opportunities to develop independence skills;
- Opportunities to improve social communication and social interaction skills and needs associated with an autistic spectrum condition;
- Access to appropriate specialist services from other agencies;
- Ensure that all school staff have an understanding of, and skills relating to, the learning requirements of children with ALN, primarily through a programme of continuous professional development and, where appropriate, opportunities for accreditation with nationally recognised qualifications;
- Where possible, in conjunction with other specialist staff/teams, the LRC will provide consultancy, outreach support and a resource base for staff and parents.

The proposal will aim to provide learners with a broad, balanced and relevant curriculum, whilst also having their exceptional needs met in as inclusive a way as possible.

5.1.6 How the proposal will contribute more generally to enhancing the quality of education and support for children with SEN.

The LRC will provide vulnerable young learners with a small class environment with a high adult to pupil ratio that provides a more flexible and responsive provision to meet their complex needs. The LRC will provide learners with opportunities for integration into mainstream classes as and when possible. The quality of education in the LRC will be enhanced due to the expertise of the specialist staff working within the provision, which should improve outcomes for learners through differentiation / modification of the curriculum.

5.2 Key School Information

Location	Milford Haven School, Steynton Road, Milford Haven, SA73 1AE
Category	Community School
Admissions Arrangements	Pembrokeshire County Council will continue to be the admissions authority for the school and therefore its admissions policy and oversubscription criteria will apply. The school will continue to admit pupils of both sexes and there will be no provision for selection by either aptitude or ability. In relation to the LRC, clear

	admission criteria will be agreed with the school in order to determine the appropriateness of the provision.
Age Range	11-19
Capacity / Admission Number	The current capacity and Admission Number of the school are as follows: Capacity = 1194 Admission Number = 212
Number of Nursery Places	N/A
Language Category	English Medium
Proposed accommodation	<p>It is proposed that school will be extensively refurbished, remodelled and upgraded as part of Band B of the 21st Century Schools Programme and this will result in appropriate accommodation for ALN provision and other specialist areas, including the Learning Resource Centre.</p> <p>The school will benefit from improved learning support spaces, including a base to support students with additional learning needs, independent study facilities to include library facilities, small group learning and breakout spaces.</p>
SEN Provision	See Para. 5.1.4 and 5.1.5
School Transport	<p>Transport arrangements will be in accordance with the law and Council's policy. In relation to pupils with Special Educational Needs, the Council will provide transport in accordance with the following criteria:</p> <ul style="list-style-type: none"> • The pupil, because of his or her disability, is incapable of using the usual school transport provided for pupils of compulsory school age receiving primary education living more than two miles from the catchment primary school and is unable to make use of any alternative means of transport such as a family car or Motability vehicle. • The pupil, because of his or her disability, is incapable of using the usual school transport provided for pupils of compulsory school age receiving secondary education living more than three miles from the catchment secondary school, and is unable to make use of any alternative means of transport such as a family car or Motability vehicle. • The pupil lives within two miles of the catchment primary school, or within three miles of the catchment secondary school, but is incapable of walking to school, and is unable to make use of any alternative

	<p>means of transport, such as a family car or Motability vehicle.</p> <ul style="list-style-type: none"> • The Inclusion Panel recommends that a pupil should be placed in a school which is not the catchment school and the above criteria are met. • Medical advice from the pupil's Medical Consultant must confirm the requirement. No other medical professional's advice will be accepted. <p>Transport is not provided for special needs pupils in the following circumstances:</p> <ul style="list-style-type: none"> • where parents choose a non-catchment school; • to attend examinations outside the normal transport arrangements; • to attend breakfast and after school clubs; • to attend swimming lessons except if the child is a wheelchair user and cannot access swimming lessons otherwise, in which case Education Services may pay the parent to transport the child. <p>The Authority may provide an attendant for pupils with statements of Special Educational Needs who qualify for transport under the defined criteria. Provision of attendants will take place after consideration by relevant officers of the individual needs of the pupil or group of pupils concerned and the nature of the transport available and is at the discretion of the Director of Education and Children's Services.</p>
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5.3 Governance

The LRC will form part of Milford Haven School, and its governance will rest with the governing body of the school.

5.4 Impact Assessments

The following represent the Council's assessment of the impact of the proposal on the community, equalities, transport and staff.

5.4.1 Community Impact Assessment

An assessment of community impact is attached at **APPENDIX 3**. However any additional impacts arising as a result of consultation will be reflected in an amended version which will be published as part of the Consultation Report.

5.4.2 Equalities Impact

The proposal is unlikely to result in any negative impact on the protected characteristics identified in the Equality Act 2010. The full assessment is attached as **APPENDIX 4**.

5.4.3 Transport Impact

The Learner Travel (Wales) Measure 2008 places a duty on the Council to assess the travel needs of learners under the age of 19. In addition to those children who qualify for free transport provision due to meeting the eligibility for distance between home and school, the Council is under a legal obligation to assess the travel needs of learners who walk to school. In relation to the proposal included within this document, walking routes to schools are assessed to ensure that learners can reach their destination in safety. There are no changes proposed to the Council's Home to School Transport policy; the relevant information in relation to transport to pupils with special educational needs is provided in Para. 5.2.

5.4.4 Staff Impact

It is inevitable that various teaching and non-teaching staff will be affected by the proposal. The governing body has responsibility for setting staffing structures and the appointment and dismissal of staff, and it should be noted that the proposal is in relation to the establishment of a Learning Resource Centre only.

In addition to their role as statutory consultees, meaningful consultation will take place with affected staff and recognised trade unions on the possible impact of the outcome of the statutory consultation. During this period, staff and trades unions will be given the opportunity to comment on the proposed changes and the governing body and LA representatives (which will include designated support from the Human Resource Department) will listen and take account of views expressed.

5.5 Finance

All schools are funded according to a formula which is largely pupil based and this is the funding which is delegated to school governing bodies for schools' revenue expenditure. In relation to the proposal to establish a Learning Resource Centre at Milford Haven School, the current funding methodology is as follows:

Provision	Funding methodology
24 Place Learning Resource Centre	<ul style="list-style-type: none">• x2 Teachers at U3 plus SEN 1• x2 HLTA• x2 LSA (Level 1)• Capitation £ per place.

For 2019/20, this attracts funding of £212,798.

5.5.1 Pupil costs

The current costs per pupil for Milford Haven School are as follows:

	2019/20		
	Pupils Jan 2019	Cost per pupil (net of SEN)	Average cost per pupil (net of SEN) – all secondary schools
	FTE	£	£
Milford Haven School	965	4081	4221

Note: Based on 2019/20 Education Budget Statement (Section 52 of the School Standards and Framework Act 1998)

5.5.2 Revenue Savings

It is not anticipated that revenue savings will arise as a result of this proposal. Funding currently provided to the Pembrokeshire Learning Centre (for the temporary provision) will be

re-allocated to Milford Haven School, and in accordance with the agreed formula methodology.

5.5.3 Capital Investment

Capital investment for this proposal is being sought from Band B of the Council's 21st Century Schools Programme. This will form part of the project to refurbish and extend Milford Haven School. It is estimated that the capital cost of establishing the LRC at Milford Haven School will be approximately £1.12 million.

It is not envisaged that any capital receipts will be realised as part of this proposal.

5.5.4 Title of land and buildings

Milford Haven School and the site on which it is located are in the ownership of Pembrokeshire County Council. No transfer or disposal of land or buildings is required as part of this proposal.

5.6 Risks and Counter measures

The Council's proposal is dependent upon the successful completion of the 21st Century Schools Band B investment at Milford Haven School. Consequently, a number of the risks identified below are project based, and not in relation to the proposed provision itself.

	Risk	Counter Measure
1	Failure to obtain relevant statutory notice approvals and Education Statutory obligations by due dates.	<ul style="list-style-type: none"> - Ensure that all options are considered in light of the School Organisation Code 2018. - Ensure sufficient time is allocated to undertake process. - Undertake consultation with appropriate statutory consultees.
2	Failure to obtain relevant business case approvals from Welsh Government	<ul style="list-style-type: none"> - Ensure that all aspects of business case are completed fully and accurately - Ensure that all queries arising from submission of business case are responded fully without delay.
3	Key partners or stakeholders are not involved in the early planning process of the project.	<ul style="list-style-type: none"> - Engage and consult with stakeholders. - Ensure all parties are aware and have agreed delivery timescales. - Ensure stakeholders are identified at an early stage and are fully involved.
4	Failure to manage risk of projects.	<ul style="list-style-type: none"> - Project Board to oversee and manage risks. - Risk register to be established. - Risk workshops to be set up.
5	Key deadlines to be identified at an early stage to avoid delays and abortive costs.	<ul style="list-style-type: none"> - Project Board is established and key milestone dates are identified and agreed. - Resources allocation/ responsibility identified. - Reviewed on a regular basis and updated and communicated to all stakeholders.
6	Unable to achieve agreed spending profile	<ul style="list-style-type: none"> - Closely monitor programme to ensure works progress according to spend profile - Accountants to hold regular meetings with Project Manager to ensure costs are contained within budget and that spend profiles are met.

6. Alternative Options Considered

Section 5 of this document outlines the Council's proposal, i.e. the preferred option. Alternative options considered as part of developing this proposal are outlined below, all of which have been discounted.

Option	Description	Comment
1	Maintain status quo	<p>Does nothing to address the lack of secondary provision for pupils with complex needs and ASC in mid Pembrokeshire. Temporary provision is currently located as part of the Pembrokeshire Learning Centre in Neyland, but this is a PRU and not a mainstream secondary school. Maintaining the status quo does not provide equality with pupils in north and south Pembrokeshire.</p> <p>DISCOUNT</p>
2	Establish LRC as part of new build at Haverfordwest High VC School.	<p>This would address the need to establish a mid county LRC; however the following issues are pertinent:</p> <ul style="list-style-type: none"> Of the 82 pupils who attend primary LRCs at Fenton, Johnston, Waldo Williams and Gelliswick schools, 49 (60%) live within 5 miles of Milford Haven School; also, half of the pupils attending the temporary provision at the Pembrokeshire Learning Centre live within the Milford Haven School catchment. <p>DISCOUNT</p>

7. The Statutory Process

The statutory process followed in respect of the proposal included as part of this document will comply with the School Standards and Organisation (Wales) Act 2013 and specifically, the School Organisation Code (011/2018). The process and timetable will be as follows:

Date	Process	
17 June 2019	Consultation Document Published	
	Consultation events with schools and wider community	
	Pupil consultation	
31 July 2019	Closing date for receipt of observations on the proposal	
At least 2 weeks prior to publishing a Statutory Notice	Publication of Consultation Report - Consultation Report presented to Council <i>Council to decide whether to approve publishing a statutory notice</i> <i>If approved – proceed to Statutory Notice</i> <i>If not approved – proposal ends</i>	
Within 26 weeks of the above closing date	Publish Statutory Notice <i>If approved, the Statutory Notice will be published on the County Council's and any other proposer's websites and posted in the named schools and other conspicuous places within the community. Copies of the notice will be made available to the relevant schools to distribute to pupils, parents/carers and members of staff.</i>	
28 days after date of Statutory Notice	Closing date for receipt of objections to proposal	
Within 28 days of the end of the Objection Period	<u>Where objections received</u> - Objection Report presented to Council <i>Council to determine proposal in light of the objections received and the content of the Objection Report</i>	<u>Where no objections received</u> <u>Council to determine proposal</u>
Within 16 weeks of the end of the Objection period	Publication of Council Decision	
September 2022	Implementation of proposal	

All reports listed above will be published on the County Council's website with parents/carers/guardians and staff members of the relevant schools advised of their availability. All consultees listed in Section 2 of this document will receive hard copies of the reports or be emailed a link to the relevant website.

Details of affected schools

Name of School	Category	Lang. Category	Age Range	Nursery Pupils January 2019	Total NOR Jan 2019	Condition Grade	Suitability Grade
Milford Haven CP	Community	English Medium	3-11	82	756	B	B
St Francis Catholic Primary	Voluntary Aided			19	121	C	C
Gelliswick VC	Voluntary Controlled			65	549	A	A
Coastlands CP	Community			12	97	B	B
Johnston CP	Community			30	265	A	A
Neyland CP	Community			27	301	A	A
Fenton CP	Community			49	431	C	C
Waldo Williams CP	Community			30	274	Inf site C Jun site C	Inf site B Jun site C

Note:

- Pupil numbers are as at January 2019 and include LRC pupils
- In relation to Condition and Suitability grades
 - A = Good
 - B = Satisfactory (condition) / Reasonable (suitability)
 - C = Poor

School	Capacity	Admission Number	Actual Number on roll (Net of Part Time and Unit Pupils)					Pupil Forecasts (Net of Part Time and Unit Pupils)				
			2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
The Meads Infants			333	344	355	336						
Milford Haven Juniors			348	361	358	369						
Milford Haven CP*	675	96					674	667	671	659	652	625
St Francis Cath.Prim	139	19	112	107	110	102	102	108	105	102	100	94
Hakin Comm. School			280	288	314							
Hubberston VC			130	135	142							
Gelliswick VC**	480	68				440	462	474	472	472	472	456
Coastlands CP	107	12	77	74	87	89	85	85	84	84	89	84
Johnston CP	210	30	177	179	203	210	210	208	213	213	216	213
Neyland CP	330	47	286	282	296	297	274	266	253	243	234	225
Fenton CP	355	50	352	369	360	357	360	359	357	358	359	359
Mount Airey Infants			124	116	121	119						
Haverfordwest VC			109	82	89	97						
Waldo Williams CP***	326	46****					232	242	253	262	260	263

* Milford Haven CP – formerly The Meads Infants and Milford Haven Junior schools

** Gelliswick VC – formerly Hakin Community and Hubberston VC schools

*** Waldo Williams CP – formerly Mount Airey Infants and Haverfordwest VC schools

**** Waldo Williams CP – Admission Number given is for its first year of operation, i.e. with effect from January 2019

School	Date of most recent Estyn inspection	Estyn Judgements		Comments	National Categorisation Support Category 2018
		Current Performance	Prospects for Improvement		
Milford Haven CP	Former Meads – Apr 2014	Good	Good		Amber
	Former MH Jun – Nov 2017	Standards – Adequate & needs improvement Wellbeing and attitudes to learning – Unsatisfactory and needs urgent improvement Teaching and learning experiences – Unsatisfactory and needs urgent improvement Care, support and guidance – Adequate and needs improvement Leadership and management – Adequate and needs improvement			
St Francis Catholic Primary	January 2015	Adequate	Adequate	Placed in Estyn Monitoring follow-up and visited by Estyn in June 2016. The school was subsequently removed from the list of schools requiring Estyn Monitoring.	Green
Gelliswick VC	January 2019	Standards – Good Wellbeing and attitudes to learning – Good Teaching and learning experiences – Adequate and needs improvement Care, support and guidance – Good			Yellow

School	Date of most recent Estyn inspection	Estyn Judgements		Comments	National Categorisation Support Category 2018
		Current Performance	Prospects for Improvement		
		Leadership and management – Good			
Coastlands CP	March 2017	Good	Adequate	Placed in Estyn Review follow-up and visited by Estyn in November 2018. Estyn judged that insufficient progress had been made in relation to the recommendations following the inspection and that the school is in need of significant improvement.	Red
Johnston CP	May 2017	Adequate	Adequate	Placed in Estyn Review follow-up and visited by Estyn in November 2018. The school was subsequently removed from the list of schools requiring Estyn review.	Yellow
Neyland CP	Sept. 2014	Adequate	Adequate	Placed in Estyn Monitoring follow-up and visited by Estyn in December 2015. The school was subsequently removed from the list of schools requiring Estyn Monitoring.	Yellow
Fenton CP	October 2012	Good	Excellent		Red
Waldo Williams CP	Former Mt Airey – Oct 2017	Standards – Adequate & needs improvement Wellbeing and attitudes to learning – Good Teaching and learning experiences – Adequate and needs improvement Care, support and guidance – Good			Amber (applied to both former constituent schools)

School	Date of most recent Estyn inspection	Estyn Judgements		Comments	National Categorisation Support Category 2018
		Current Performance	Prospects for Improvement		
		Leadership and management – Adequate and needs improvement			
	Former Haverfordwest VC – Feb 2016	Unsatisfactory	Unsatisfactory	Placed in Estyn Special Measures and visited by Estyn in December 2017. The school was subsequently removed from the list of schools requiring special measures.	

Summary

Milford Haven School has an inclusive and caring ethos. The majority of teachers establish good working relationships with pupils which foster learning well. The majority of pupils demonstrate positive attitudes to learning and make suitable progress in developing their knowledge and understanding. The poor behaviour and negative attitudes of a minority of pupils have a detrimental effect on school life as well as impacting on learning across all year groups. As a result, a minority of pupils make insufficient progress in developing their knowledge, understanding and skills.

During the last three years, leadership has impacted positively on improving performance in the majority of key performance indicators at key stage 4. On the whole, leaders have a sound broad understanding of many of the main strengths and weaknesses of the school's work. However, the school does not have a sufficiently co-ordinated approach to the progressive development of pupils' skills across the curriculum and teaching requires urgent improvement. Policies and procedures to manage behaviour are ineffective.

Inspection area	Judgement
Standards	Adequate and needs improvement
Wellbeing and attitudes to learning	Unsatisfactory and needs urgent improvement
Teaching and learning experiences	Unsatisfactory and needs urgent improvement
Care, support and guidance	Adequate and needs improvement
Leadership and management	Adequate and needs improvement

Recommendations

- R1 Raise standards at key stage 4 and improve the progress made by all pupils in lessons, in particular their development of literacy and numeracy skills
- R2 Improve pupil behaviour and attitudes to learning
- R3 Improve the quality of teaching
- R4 Strengthen the planning for the development of pupils' skills
- R5 Improve the quality and impact of leadership, particularly through the strengthening of arrangements for self-evaluation and improvement planning
- R6 Address the deficit budget

What happens next

In accordance with the Education Act 2005, HMCI is of the opinion that this school is in need of significant improvement. The school will draw up an action plan that shows how it is going to address the recommendations. Estyn will monitor the school's progress about 12 months after the publication of this report.

COMMUNITY IMPACT and WELL-BEING GOALS ASSESSMENT

Number and percentage of pupils attending the school living within the catchment area (as at January PLASC data 2019)

1297 pupils live within the catchment area of Milford Haven School. Of these, 916 pupils attend their catchment school.

Number of catchment pupils attending other schools (as at January PLASC data 2019)

The remainder of the 381 pupils living within the catchment area of Milford Haven School attend schools outside the catchment area as follows:-

- Ysgol Greenhill School = 2
- Ysgol Harri Tudur/Henry Tudor School = 13
- Ysgol y Preseli = 19
- Haverfordwest High VC School = 332
- Ysgol Caer Elen = 4
- Ysgol Penrhyn Dewi = 11

Number of pupils attending the school living outside the catchment area (as at January PLASC data 2019)

Of the 939 pupils attending Milford Haven School, 23 pupils live within the catchment areas for:-

- Haverfordwest High VC School = 17
- Ysgol Harri Tudur/Henry Tudor School = 5
- Ysgol y Preseli = 1

Other facilities the school accommodates i.e. youth club/play group and occurrence

The following community groups utilise the school's facilities occasionally:

- Tritons Cycle Club
- Neyland Football Club.

Other facilities or services the school provides e.g. after school clubs, community library

The school makes itself available for community use, however the take-up appears to be limited at present.

In the event of a closure where would the facilities/services accommodated in the school be provided?

It is not proposed to remove school provision.

Will/could other facilities available in the immediate local or wider community be enhanced in the event of a school closure? (e.g. improvements to village halls, playgrounds, provision of holiday play schemes)

It is not proposed to remove school provision.

What facilities and services are provided at any alternative school?

It is not being proposed to remove provision, merely to add specialist ALN provision.

What is the distance and travelling time involved in attending an alternative school of the same language category?

It is not being proposed to remove provision, merely to add specialist ALN provision. The nearest alternative English medium schools are Haverfordwest High VC School which is 7.3 miles (16 minutes away), Henry Tudor School which is 6.6 miles (13 minutes away). The nearest Welsh medium secondary school is Ysgol Caer Elen which is a distance of 8 miles (17 minutes away).

How will parents' and pupils' engagement be supported with the alternative school and the facilities it may offer (e.g. how pupils (and particularly any less advantaged pupils) will be helped to participate in after school activities)

It is not being proposed to remove provision, merely to add specialist ALN provision.

What facilities and services are provided within the Milford Haven area (i.e. community use, halls etc)?

Public places / services	Community halls
The Meads Leisure Centre	Pill Social Centre
Milford Haven Library and Information Centre	St Francis Church Hall
Milford Youth Matters Centre	Milford Haven Sea Cadets & Royal Marines Cadets Hall
	Hubberston Community Centre

There are a variety of community/church groups which hold various events in the above venues.

What nursery provision is available in Milford Haven?

Within the Milford Haven area, there are a small number of nurseries and childcare provision that are suited to children aged 3 years. A mixture of provision is provided from private childcare, specialist support to nursery provision, catering for an age range from 0 to 4 years.

What are the wider implications the changes will have on public transport provisions?

It is unlikely that the proposals will have any further impact on the provision of public transport in the area.

What are the wider community safety issues?

There are unlikely to be any wider community safety arising as a result of the proposal.

How does the proposal fit with Well-being goals for Pembrokeshire/Wales	
Prosperous	The proposal to establish an LRC at Milford Haven School is unlikely to have a direct impact on this goal. However, the planned capital investment at the school will put the Council in a better position to address capacity and building quality issues for the future.
Resilient	The proposal will make a small contribution to this aim as, if the capital investment takes place and some existing buildings are replaced, then it is likely that the new buildings will be more energy efficient. It is also reasonable to assume that this will result in lower Co2 emissions.
Healthier	The proposal has the potential to contribute to better educational attainment levels and this will tend to promote improved health.
Equal	See Appendix 4
Cohesive communities	Both the school and wider community are key consultees to this proposal.
Vibrant culture & thriving Welsh language	It is not proposed to change the language category of the existing provision. The proposal is unlikely therefore to have an impact on this goal.
Globally responsible	The proposal is likely to have a neutral effect. The proposal will facilitate accessing capital funding which could reduce Co2 emissions and tackle the use of energy-inefficient temporary classrooms.

Appraising sustainability of the proposal	
Long term How the proposal balances the short term with safeguarding the ability to meet long term needs	<p>The proposal explicitly considers the long term by ensuring that pupils' needs are met via bespoke provision at a mainstream secondary school. It also considers how the Council can facilitate accessing capital funding to extend/refurbish buildings.</p> <p>The proposal supports the broader Council aims of increasing attainment and skills levels which is vital to meeting long-term challenges.</p>
Prevention How the proposal may prevent problems occurring or getting worse	<p>The proposal will make it easier to address the needs of pupils with complex learning needs.</p>
Integration Considering how the proposal fits with the objectives of other public bodies	<p>The proposal is consistent with the Council's Inclusive Education policy of promoting achievement and wellbeing for all. In essence it means making sure that all children and young people have access to the same opportunities</p>

	and services as everybody else and that their views are listened to and taken account of.
Collaboration How the proposal fits with working with other organisations or other part of the Council.	Collaboration with other organisations, notably schools' governing bodies, is key to ensuring that the proposal is implemented and, ultimately, successful.
Involvement How people have been involved and how have we ensured that those people reflect the diversity of Pembrokeshire.	A wide stakeholder involvement is an inherent part of the statutory school organisation process in Pembrokeshire.

APPENDIX 4

Equality Impact Assessment – Summer 2019

Protected Characteristics	Current Schools	Proposal	Impact
Age	Milford Haven School provides secondary school provision up to the age of 19	This proposal will not result in a change to the age range of the school.	No change
Disability	<ul style="list-style-type: none"> Young disabled people are more likely to live in Pembrokeshire's main towns The school's Access Plan indicates significant issues in relation to improving the physical environment of the school to increase the extent to which disabled people can take advantage of education and associated services in schools 	All accommodation benefiting from capital investment from the 21C Programme will have full accessibility. Buildings will also have better IT and network facilities which makes it easier to support pupils with additional needs through IT.	Positive
Race	<ul style="list-style-type: none"> 5% of Milford Haven School's pupils are described as "Minority Ethnic", i.e. where the ethnic background is described as anything other than "White-British". No discrimination against race in the Admissions Policy 	The proposal is unlikely to have any great effect on the race of pupils attending the school. Similarly, there will be no change to the Council's Admissions Policy.	No change
Religion & Belief	Milford Haven is a Community School	The proposal to introduce an LRC will not affect the way in which the school addresses religion and belief issues. The school will remain as a Community School.	No change
Sex	Milford Haven is a mixed sex secondary school	The school will continue to be a mixed sex school.	No change
Marriage or civil partnership	The school meets with the requirements to comply with the Equality Act 2010 within the school's Strategic Plan		No change
Pregnancy & maternity			No change
Sexual Orientation			No change
Gender reassignment			No change

Regulated Alteration to Milford Haven School – Provision of Learning Resource Centre



1) Please indicate which of the following reflects your views on the proposal:

<i>Establish a 24 place Learning Resource Centre for pupils with Complex Learning Needs and Autistic Spectrum Condition at Milford Haven School.</i>	Please tick one
I do not feel strongly one way or the other	
I support the proposal	
I do not support the proposal	

2) Please provide any alternatives you have to the Council's proposal.

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3) Please provide any other comments on the proposal.

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About you:

4). Please tell us what your interest is in the consultation? *(please tick all that apply)*

<input type="checkbox"/>	Pre-school Parent
<input type="checkbox"/>	Staff
<input type="checkbox"/>	Parent
<input type="checkbox"/>	Governor
<input type="checkbox"/>	Local resident
<input type="checkbox"/>	Other _____

<input type="checkbox"/>	Milford Haven School
<input type="checkbox"/>	Milford Haven CP School
<input type="checkbox"/>	St Francis Catholic School
<input type="checkbox"/>	Gelliswick VC School
<input type="checkbox"/>	Coastlands CP School
<input type="checkbox"/>	Johnston CP School
<input type="checkbox"/>	Neyland CP School
<input type="checkbox"/>	Fenton CP School
<input type="checkbox"/>	Waldo Williams School

5). Are you? *(please tick only one)*

<input type="checkbox"/>	Aged 16 or under
<input type="checkbox"/>	Aged 17 – 24
<input type="checkbox"/>	Aged 25 – 64

<input type="checkbox"/>	Aged 65 or over
<input type="checkbox"/>	Prefer not to say

6). In which language do you prefer to communicate? *(please tick only one)*

<input type="checkbox"/>	English	<input type="checkbox"/>	Welsh	<input type="checkbox"/>	Prefer not to say
<input type="checkbox"/>	Other (please specify)	_____			

7). Are your day to day activities limited by an illness or condition that has lasted, or is expected to last, for 12 months or more? *(please tick only one)*

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Prefer not to say
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8). Do you provide care for someone (aged 19 or under) whose day to day activities are limited by an illness or condition that has lasted, or is expected to last, for 12 months or more? *(please tick only one)*

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Prefer not to say
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9). What is your religion? *(please tick only one)*

<input type="checkbox"/>	No religion
<input type="checkbox"/>	Christian (all denominations)
<input type="checkbox"/>	Buddhist
<input type="checkbox"/>	Hindu
<input type="checkbox"/>	Jewish
<input type="checkbox"/>	Muslim

<input type="checkbox"/>	Sikh
<input type="checkbox"/>	Prefer not to say
<input type="checkbox"/>	Other, please specify

Please tick the box if you wish to be informed of the publication of the Consultation Report. ☐

You are asked to provide email and postal address details ONLY if you wish to receive a copy of the Consultation Report. Other information you are asked to provide is for the purposes of Equalities Monitoring and will be used for statistical purposes only.

Print Name..... Email

Address.....
.....

We will make any comments that you make publically available as part of the Consultation Report, unless you ask us not to.

Please tick this box if do not wish for your comments to be made publicly available.
☐

All information will be handled in accordance with the Data Protection Act 2018.

Please return to: Director for Children & Schools, Pembrokeshire County Council, County Hall, Haverfordwest, SA61 1TP no later than 5pm on 31 July 2019.

Thank you for your time