

Factors to be taken into account in approving/determining school organisation proposals

AMALGAMATION OF YSGOL Y FRENNI AND YSGOL Y PRESELI

FACTORS	EVIDENCE
<p>1.3 Quality and standards in education</p> <p>Relevant bodies should place the interests of learners above all others. With reference to the five inspection areas of the Office of Her Majesty's Chief Inspector of Education and Training in Wales (Estyn) Common Inspection Framework (as of September 2017), they should consider the likely impact of the proposals on the following at the school or schools which are the subject of the proposals and at any other school or educational institution which is likely to be affected.</p> <ul style="list-style-type: none"> • Standards and progress overall, of specific groups and in skills; • Wellbeing and attitudes to learning; • Teaching and learning experiences (quality of teaching, the breadth, balance and appropriateness of the curriculum, and the provision of skills; • Care support and guidance (tracking, monitoring and the provision of learning support, personal development and safeguarding); and • Leadership and management (quality and effectiveness of leaders and managers, self-evaluation processes and improvement planning, professional learning, and use of resources) • Relevant bodies should pay particular attention to the impact of the proposals on vulnerable groups, including children with SEN. 	<p>The proposal will have a positive impact on standards and progress of all pupils due to the sharing of expertise, and specific skills set of staff across all age ranges, and settings (currently Ysgol Y Preseli, Y Porth and Ysgol Y Frenni). As a result, the increased opportunities for the sharing of good practice across settings and age ranges will improve provision for specific groups of learners for example those with additional learning needs and more able learners. Wellbeing and attitudes to learning will improve in the main with enhanced opportunities for effective transition between key stages. It is unlikely that the proposal will impact on standards, wellbeing and attitudes to learning at any of the other school likely to be affected by the proposal.</p> <p>The overall quality of teaching will be sustained, however the development of the new curriculum will be the focus for both schools over the next few years. The proposal will support the development of the new curriculum in the secondary sector based on the current strong practice at Ysgol Y Frenni, extending the educational continuum and improving the provision of skills. The proposal will also allow additional pupil enrichment opportunities for example the potential introduction of a modern foreign language to the primary sector utilising the expertise from the secondary sector, and ensuring curricular breadth. 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>The proposal will improve learner outcomes across all phases, as refining tracking and monitoring procedures will ensure a better understanding of progress from baseline data. As a result, setting high expectations and accountability for pupil progress will improve, as well as the targeted support for learners, ensuring that all pupils make at least expected progress. The proposal would ensure that all good practice in terms of safeguarding procedures currently evident would be aligned across all settings. It is unlikely that the</p>
<p>Relevant bodies should also consider the ability of the school or schools which are the subject of the proposals to deliver the</p>	

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<p>full curriculum at the foundation phase and each key stage of education. This consideration should include the quality of curriculum delivery and the extent to which the structure or size of the school is impacting on this.</p>	<p>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.</p>
<p>Where proposals involve the transfer of learners to alternative provision there should normally be evidence that the alternative would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners (including learners with SEN). Advice from Estyn might reasonably be used as evidence in relation to alternative provision which is brand new. Proposers should ensure that the disruption to learners is minimised.</p>	<p>The proposal would provide a leadership structure that would incorporate knowledge and expertise of all age ranges, subject areas and specialisms. This would ensure a vision based on developing coherence, incorporating a broad and balanced understanding of pupil outcomes based on a wide range of monitoring activities across all age ranges, and stages of development. As a result improvement planning would be incisive and specific. The proposal would ensure effective professional learning opportunities by sharing good practice within and across all settings. Sharing resources across all settings would provide good value for money and would be realistically achievable due to the close proximity of settings. 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.</p> <p>The school will be able to deliver the full curriculum to all learners. 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>In assessing the impact of proposals on quality and standards in education and how effectively the curriculum is being delivered, relevant bodies should consider any relevant advice from Estyn, refer to the most recent Estyn reports or other evidence derived from performance monitoring, and take into consideration any other generally available information available on a school's effectiveness.</p>	<p>In reaching its decision to publish this proposal (statutory notice), Pembrokeshire County Council considered Estyn's response to the consultation. In relation to the educational aspects of the proposal, "<i>the proposer has generally considered well the impact of the proposals on the quality of outcomes, provision and leadership and management. The proposer has referenced the outcomes of the most recent Estyn and challenge advisor reports...The proposer has explained how a 3-19 school will help the schools move towards meeting a few of the recommendations of these reports...</i>". Furthermore, "<i>the proposer has suitably considered the impact on pupils with special needs...and asserts reasonably that a 3-19 school may improve the leadership structure of the school by providing improved distribution of leadership roles and professional development of staff... and the proposer has identified fairly that there will be limited disruption to pupils, transport and to the local community as the new school will remain on its current site</i>".</p>

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<p>1.4 Need for places and the impact on accessibility of schools</p> <p>Local authorities must ensure that there are sufficient schools providing primary and secondary education for their area. Schools are regarded as sufficient if they are sufficient in number, character and equipment to provide for all pupils the opportunity of appropriate education¹. In order to fulfil these duties, local authorities must ensure that they plan thoroughly and engage fully with relevant partners, including the appropriate religious bodies² for schools serving their area which have a designated religious character.</p> <p>In the light of the above, relevant bodies should have regard to the following factors:</p>	
<p>Where a school closure, reduction in capacity or age range contraction is proposed:</p>	
<p>Whether alternative school-based provision will have sufficient capacity and provide accommodation of at least equivalent quality, for existing and projected pupil numbers.</p>	<p>There is no proposal to remove provision – alternative school-based provision is therefore not necessary. Primary and secondary provision will remain but in the form of an all-through school. The proposal will not affect the Council’s obligations in relation to transport provision.</p>
<p>With reference to the nature of the schools subject to proposals, whether the alternative school-based provision is sufficient to meet existing and projected demand for schools of the same:</p> <ul style="list-style-type: none"> a) Language category as set out in “Defining schools according to Welsh medium provision” Welsh Assembly Government Information document No: 023/2007 or any successor documents; and b) (if relevant) designated religious character, 	<p>The language categories of the primary and secondary phases of the proposed school will remain the same as the constituent schools. Similarly, the proposed school will not have a religious character.</p> <p>The proposal will result in maintaining Welsh medium provision in the area, albeit in an all-through 3-19 school. In relation to the targets set out in the current WESP, it is likely that the proposal will at least maintain the level of pupil numbers being taught through the medium of Welsh. A 3-19 school will remove the necessary transition point at the end of key stage 2 and this may encourage a greater number of parents to keep their children at the school and therefore receiving Welsh medium provision.</p>

¹ Section 14 of the Education Act 1996.

² An appropriate religious body is, in the case of a Church in Wales or Roman Catholic school, the appropriate diocesan authority, or in the case of other schools, the body representing the religion and religious denomination stated in relation to the school in an order made under section 69(3) of the School Standards and Framework Act 1998.

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<p>In all cases local authorities should consider:</p> <ul style="list-style-type: none"> • The extent to which the proposal would support the targets in the approved Welsh in Education Strategic Plan (WESP) • How the proposal would expand or reduce Welsh language provision and in the case of the latter, set out why provision will be reduced 	
<p>The nature of journeys to alternative provision and resulting journey times for pupils including SEN pupils; in particular whether primary school pupils will have one-way journeys in excess of 45 minutes or secondary school pupils one way journeys of over an hour.</p>	
<p>Where a new school, increase in capacity or age range expansion is proposed;</p>	
<ul style="list-style-type: none"> • that there is evidence of current or future need/demand in the area for additional places, with reference to the school or proposed school's language category, designated religious character, and the gender intake (i.e. co-educational/single sex); 	<p>No change – the proposal will continue to meet demand for Welsh medium places in the area. Furthermore no changes are proposed to the language categories, religious character and gender intake.</p> <p>The proposal, and alternatives are unlikely to improve access for disabled pupils. This can only be achieved with significant capital investment, particularly in relation to Ysgol y Preseli; this has been flagged as a potential Band C 21st Century Schools project.</p>
<ul style="list-style-type: none"> • whether proposals will improve access for disabled pupils in accordance with requirements under the Equality Act 2010. 	
<p>1.5 Resourcing of education and other financial implications</p>	

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It is important that funding for education is cost effective. Relevant bodies should take into account the following factors in relation to the resourcing of education:	
<ul style="list-style-type: none"> what effect proposals will have on surplus places in the area; 	The proposal will not have an effect on surplus places in the area. However, there may be an opportunity to address surplus places if capital investment is available, but this should be balanced with the need to be mindful of retaining sufficient capacity for Welsh medium provision growth to meet national strategies.
<ul style="list-style-type: none"> whether proposals form part of the local authority's 21st Century Schools Investment Programme and contributes to the delivery of sustainable schools for the 21st Century and to the better strategic management of the school estate. 	Ysgol y Preseli was identified within our Band B SOP as a potential project for Band C of the 21C Schools Programme.
Relevant bodies should also take into account the following factors in relation to finance:	
<ul style="list-style-type: none"> the recurrent costs of proposals over a period of at least 3 years and whether the necessary recurrent funding is available; 	The current funding formula for 'all-through' schools provides that funding is provided on the basis of both primary and secondary elements. This methodology is under review, but the necessary recurrent funding is available.
<ul style="list-style-type: none"> additional transport costs incurred as a result of proposals; <p><i>Proposers should take into account the requirement on local authorities to provide free transport provision under the Learner Travel (Wales) Measure and should seek the advice of Regional Transport Consortia in relation to the impact the proposal might have on associated transport costs and their affordability.</i></p>	<p>Transport arrangements will be in accordance with the law and the Council's policy.</p> <p>Free transport will be provided according to the Learner Travel Wales Measure – Operational Guidance and Pembrokeshire County Council's school transport policy. These arrangements apply to learners resident in Pembrokeshire or deemed to be the responsibility of Pembrokeshire County Council. The Council will provide transport where a child of compulsory school age receiving primary education, lives over two miles from the nearest suitable school, or in the case of a child receiving secondary education, living over three miles from the nearest suitable school. The Council reserves the right to name as suitable school one which is not the catchment school.</p> <p>Given that the primary and secondary provision on the site will remain, and that there is no change to catchment areas, it is not envisaged that the proposal will lead to additional transport costs.</p>

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<ul style="list-style-type: none"> the capital costs of proposals and whether the necessary capital funding is available; 	<p>No capital investment will be made directly as a result of the proposal; similarly it is not envisaged that any capital receipts will be realised. It has been recognised that Ysgol y Preseli is in poor condition, but any future capital investment on the school is not predicated on this proposal.</p>
<ul style="list-style-type: none"> the scale of any projected net savings (taking into account school revenue, transport and capital costs); <p><i>In relation to proposals where substantial upfront capital investment is required (for example to support a substantial remodelling, refurbishment or a new build project), the costs and savings of the proposals should be calculated over the lifespan of the relevant building, and compared against the costs and savings associated with the maintenance of the status quo.</i></p>	<p>On the basis of the current funding formula, it is unlikely that savings will arise as a result of the proposal. However, if savings arise as a consequence of a future review of the schools' funding formula, these will be retained in the local schools' budget.</p> <p>Both schools were in surplus at the end of March 2020 and are forecast to remain so at the end of the current financial year. However, current .medium term financial planning suggests that both schools will be in deficit thereafter.</p> <p>Any savings in recurrent costs, i.e. as a result of any future formula calculations, will be retained in the LA's schools' budget.</p> <p>The proposal will not result in any redundant sites, therefore no capital receipts are anticipated.</p>
<ul style="list-style-type: none"> whether, without the proposals, the schools affected would face budget deficits; 	
<ul style="list-style-type: none"> whether any savings in recurrent costs will be retained in the local authority's local schools' budget; and 	
<ul style="list-style-type: none"> whether the proceeds of sales (capital receipts) of redundant sites are to be made available to meet the costs of the proposal or contribute to the costs of future proposals which will promote 	

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effective management of school places.	
1.6 Other general factors	
Relevant bodies should take into account the following general factors:	
<ul style="list-style-type: none"> • what impact proposals will have on educational attainment among children from economically deprived backgrounds; 	It is not considered that there would be any impact on educational attainment among children from economically deprived backgrounds.
<ul style="list-style-type: none"> • any equality issues, including those identified through equality impact assessments; and 	With the exception of disability, it is considered there will be no impact on any of the other protected characteristics covered by the Equality Act 2010. In relation to disability, there are significant accessibility issues at Ysgol y Preseli that cannot be addressed without significant capital investment.
<ul style="list-style-type: none"> • whether the school or schools involved are subject to any trust or charitable interests which might be affected by the proposals, for example in relation to the use or disposal of land. 	There are no trusts or charitable interests in relation to any of the relevant schools.
1.7 Specific factors in the consideration of school closures	
When considering whether a closure is appropriate, special attention should be given to the following:	
Whether the establishment of multi-site schools might be considered as a means of retaining buildings, or the reasons for not pursuing this option;	Both Ysgol y Frenni and Ysgol y Preseli will cease as individual entities as a result of this proposal. However, primary and secondary provision will be maintained as part of a combined, all-through 3-19 school on the premises of the constituent schools.
Whether alternatives to closure, such as clustering, collaboration or federation with other schools, might be considered (taking account of the scope for use of ICT links	The proposed school will enhance the Crymych campus which already includes day nursery, Cylch Meithrin, established adult learning provision, community library, leisure centre and swimming pool, and a recently installed all-weather sports pitch.

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between school sites) or the reasons for not pursuing these as an alternative;	The proposal will have no effect on the community, as the provision will be maintained.
Whether the possibility of making fuller use of the existing buildings as a community or educational resource could be explored;	
(Local Authorities should consider whether it would be feasible and economical to co-locate local services within the school to offset the costs of maintaining the school)	
The overall effect of closure on the local community (including the loss of school based facilities which are used by the local community;	
How parents' and pupils' engagement with the alternative school and any facilities it may offer could be supported (e.g. how pupils; particularly any less advantaged pupils) will be helped to participate in after school activities).	
1.8 Presumption against the closure of rural schools	
Designation or 'rural school' for the purposes of the presumption against closure	<p>Ysgol y Frenni is defined as a 'Rural School'. Consequently, prior to deciding to undertake statutory consultation, the proposer (Pembrokeshire County Council) considered a 'Proposal paper' which in addition to detailing the factors pertinent to all proposals, also included:</p> <ul style="list-style-type: none"> • The reason for the closure proposal; • A list of the reasonable alternatives to closure that have been identified; and • An assessment of the following for each of the reasonable alternatives that have been identified: <ul style="list-style-type: none"> ○ The likely impact on Quality and Standards in Education ○ The likely impact on the community ○ The likely effect of different travelling arrangements.
Formulating the proposal	
Identifying reasonable alternatives	
Preparing a proposal paper for the decision maker	
1.9 Specific factors to be taken into account for proposals to add or remove nursery classes	
N/A	

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1.10 Specific factors to be taken into account for proposals to reorganise secondary schools or to add or remove sixth forms	
Relevant bodies should take into account the following specific factors:	
Whether proposals will lead to an improvement in the educational or training achievements of persons who are above compulsory school age but below the age of 19.	There is no proposal to remove provision – sixth form provision will remain but as part of an all-through school. This will continue to be the only Welsh medium sixth form provision in Pembrokeshire.
Whether proposals will contribute to an appropriate range of relevant courses and qualifications and high quality, employer informed, vocational learning routes targeted at pupils of all abilities, whilst maintaining GCSE, AS/A level and other established courses, as required under the Learning and Skills (Wales) Measure 2009 for 14-19 year old learners.	Performance in the sixth form is consistently high. The A*-A, A*-C, A*-E indicators are all well above the national and local percentages. In 2019, the average wider points score increased again, despite a number of pupils ceasing to study a third subject following receipt of non-conditional offers from universities, in recognition of the status of the Welsh Bacalaureate qualification.
Whether proposals are likely to lead to increased participation in learning by pupils beyond compulsory school age, taking into account transport issues and costs to the learner and others, the affordability of such costs, and the likelihood of learners being willing to travel.	
The extent to which proposals contribute to the 14-19 agenda taking account of the views of regional 14-19 networks.	
The effect of proposals on 11-16 provision in schools.	
How proposals would affect the viability of institutions already providing good-quality post-16 provision, including school sixth	

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forms, Further Education Institutions and private training organisations.	
How proposals might affect the sustainability or enhancement of Welsh medium provision in the regional 14-19 network and wider area and promote access to availability of Welsh medium courses in post-16 education.	
The extent to which proposals will provide additional learner benefits compared with the status quo and other tenable options for post-16 organisation; and	
How proposals might affect the discretionary transport provision a local authority may provide to learners above compulsory school age.	Discretionary transport is currently provided to post 16 learners; in accordance with the Council's transport policy this is currently free of charge.
1.11 Specific factors to be taken into account for proposals to increase provision in voluntary schools or establish a new voluntary school	
N/A	
1.12 Specific factors in the consideration of proposals for the change of language medium	
N/A	
1.13 Specific factors in the consideration of proposals for the change of school category	
N/A	
1.14 Additional factors to be taken into account in preparing, publishing, approving or determining proposals for the reorganisation of SEN provision	
N/A	
1.15 Factors to be taken into account in approving/determining school organisation proposals	
When approving proposals, relevant bodies who are the proposer:	
Must consider whether there are any other related proposals	There are no related proposals.
Must ensure that the statutory consultation has been conducted in accordance with the Code (the requirement to consult does	Statutory consultation was undertaken in accordance with the Code.

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not apply to proposals to discontinue a school which is a small school)	
Must ensure that the proposal has been published in accordance with the Code and the notice contains all the required information.	The statutory notice was published in accordance with the Code and included all the required information.
Must consider the consultation document and consultation report.	Full Council considered these at its meeting on 8 th October 2020.
Must consider the objections and the objection report and any responses to the notice supporting the proposals.	One objection was received, but this was subsequently withdrawn.
Should consider, in the case of a proposal to change the category of a school, whether, there are any benefits. If no benefits can be identified, such proposals should not be approved.	Not applicable
Must not approve change of category proposals where a variation in the trust deed is necessary but has not yet taken place.	Not applicable