



## **CABINET**

**2.00PM, WEDNESDAY 2 OCTOBER 2024**

**MULTI-LOCATION MEETING – COUNCIL CHAMBER PORT TALBOT  
AND MICROSOFT TEAMS**

**ALL MOBILE TELEPHONES TO BE SWITCHED TO SILENT FOR THE  
DURATION OF THE MEETING**

### **Webcasting/Hybrid Meetings:**

This meeting may be filmed for live or subsequent broadcast via the Council's Internet Site. By participating you are consenting to be filmed and the possible use of those images and sound recordings for webcasting and/or training purposes.

### **Part 1**

1. Appointment of Chairperson
2. Chairpersons Announcement/s
3. Declarations of Interest
4. Minutes of Previous Meeting (*Pages 5 - 14*)
5. Forward Work Programme 2024/25 (*Pages 15 - 28*)
6. Public Question Time  
Questions must be submitted in writing to Democratic Services, [democratic.services@npt.gov.uk](mailto:democratic.services@npt.gov.uk) no later than noon two working days prior to the meeting. Questions will be dealt with in a 10 minute period.

### **Report/s of the Director of Finance**

7. Budget Report (*Pages 29 - 48*)
8. Community Councils Minor Projects Scheme - Application from Cilybebyll Community Council (*Pages 49 - 54*)
9. Neath Port Talbot Welsh Church Act Trust Fund (*Pages 55 - 60*)
10. Miscellaneous Grant Fund Application (*Pages 61 - 66*)

### **Report/s of the Head of Housing and Communities**

11. Disabled Facilities Grant Options Appraisal (*Pages 67 - 98*)

### **Report/s of the Head of Planning and Public Protection**

12. Consideration of the Draft Air Quality Action Plan (2024-2029) and the Consultation Procedures to be Implemented (*Pages 99 - 192*)

### **Report/s of the Head of Adult Services**

13. Directs Payments Policy (*Pages 193 - 254*)

### **Report of the Head of Legal and Democratic Services**

14. Public Health (Wales) Act 2017 - Special Procedures Licensing (*Pages 255 - 264*)

### **Report/s of the Chief Executive**

15. Consultation on 2026 Review of Senedd Constituencies (*Pages 265 - 280*)

### **Report/s of the Director of Education**

16. Welsh in Education Strategic Plan 2022-2032 (*Pages 281 - 416*)
17. Strategic School Improvement Programme (*Pages 417 - 452*)
18. School Based Counselling Service Update (*Pages 453 - 466*)
19. Future Provision of Indoor Leisure Services (*Pages 467 - 502*)

20. Urgent Items  
Any urgent items (whether public or exempt) at the discretion of the Chairperson pursuant to Regulation 5(4)(b) of Statutory Instrument 2001 No. 2290 (as amended).
21. Access to Meetings - Exclusion of the Public (*Pages 503 - 508*)  
To resolve to exclude the public for the following items pursuant to Regulation 4 (3) and (5) of Statutory Instrument 2001 No. 2290 and the relevant exempt paragraphs of Part 4 of Schedule 12A to the Local Government Act 1972.

## **Part 2**

### **Report/s of the Director of Education**

22. Future Provision of Indoor Leisure Services (Exempt under Paragraph 14) (*Pages 509 - 512*)

### **Report/s of the Chief Executive**

23. Celtic Freeport (Exempt under Paragraph 14) (*Pages 513 - 1022*)

### **Report/s of the Head of Housing and Communities**

24. Initial Business Case for the Development of a Triage Centre (Exempt under paragraph 14) (*Pages 1023 - 1052*)

### **Report/s of the Director of Finance**

25. Debt Write Offs (Exempt Under Paragraph 14) (*Pages 1053 - 1064*)

### **Joint Report/s of the Head of Leisure Tourism Heritage and Culture and the Director of Environment and Regeneration**

26. Proposed Agreement for Lease, Unit 4, Neath (exempt under Paragraph 14) (*Pages 1065 - 1080*)

### **Report/s of the Head of Property and Regeneration**

27. Proposed Lease, Courtyard at Margam Country Park (Exempt Under Paragraph 14) (*Pages 1081 - 1094*)

28. Proposed Renewal of Lease, Retail Premises Neath (exempt under Paragraph 14) (*Pages 1095 - 1108*)

**K.Jones**  
**Chief Executive**

**Civic Centre**  
**Port Talbot**

**Thursday, 26 September 2024**

**Cabinet Members:**

Councillors. S.K.Hunt, S.A.Knoyle, N.Jenkins, J.Hurley, S.Harris,  
J.Hale, A.Llewelyn, W.F.Griffiths, S.Jones and C.Phillips

**EXECUTIVE DECISION RECORD**

**CABINET**

**11 SEPTEMBER 2024**

**Cabinet Members:**

Councillors: S.K.Hunt, S.A.Knoyle, N.Jenkins, J.Hurley, S.Harris,  
J.Hale, A.Llewelyn, S.Jones and C.Phillips

**Officers in Attendance:**

K.Jones, N.Pearce, A.Jarrett, K.Warren, N.Daniel, A.Thomas, H.Jones,  
C.Griffiths, G.Hargest, M.Selby, S.Brennan, J.Burge, H.Short, S.Coe,  
C.Jones, N.Jones and C.John

**Invitees: Councillors T.Bowen, P.Richards and C.Jordan**

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1. **APPOINTMENT OF CHAIRPERSON**

Agreed that Councillor S.K.Hunt be appointed as Chairperson for the meeting.

2. **CHAIRPERSONS ANNOUNCEMENT/S**

The Chair welcomed all to the meeting.

3. **DECLARATIONS OF INTEREST**

The following Member made a declaration of interest at the beginning of the meeting:

Councillor S.Knoyle

Minute No. 10 - Community Councils Minor Projects Scheme – Glynneath Town Council– Cllr Knoyle is named in the document.

Minute No. 23 - LA Governors - Autumn Term 2024– Family member is named in the document.

Councillor S.Jones

Minutes No.14 – UK Shared Prosperity Fund - Approval of Community Facilities Improvement Fund ProjectsAs he is a trustee of Croeserw Athletic Club.

4. **MINUTES OF PREVIOUS MEETING**

That the minutes of the previous meeting of Cabinet, held on the 24 July 2024 and 7 August 2024, be agreed as an accurate record.

5. **FORWARD WORK PROGRAMME 2024/25**

The Forward Work Programme 2024/25 was noted.

6. **PUBLIC QUESTION TIME**

No public questions were received.

7. **REVENUE BUDGET MONITORING REPORT 2024/25**

**Decision:**

1. That members note the contents of this report in relation to the current projected budget outturn and reserves position
2. That members note the progress against the agreed savings.
3. That members note that Officers will look to implement additional cost saving and income generation measures in year in order to reduce the current overspend position. These measures will only be where they can be delivered within existing policy frameworks.

8. **CAPITAL BUDGET MONITORING REPORT 2024/25**

**Decision:**

That members approve;

1. The updated proposed 2024/25 budget totalling £77.979m;

2. Note the position in relation to expenditure as at 30th June 2024.

**Reason for Proposed Decision**

To comply with the Councils constitution in relation to budget virement, re-profiling between financial years and to update the Council's Budget projections for 2024/25.

**Implementation of Decision**

The decision is proposed for implementation after the three day call in period.

9. **TREASURY MANAGEMENT MONITORING 2024/25**

**Decision:**

That the report be noted.

10. **COMMUNITY COUNCILS MINOR PROJECTS SCHEME –  
GLYNNEATH TOWN COUNCIL**

Councillor S.Knoyle reaffirmed his interest, and left the meeting for this item.

**Decision:**

That members approve a grant of 50% of actual costs up to a maximum of £10,000 to Glynneath Town Council Council.

**Reason for Proposed Decision:**

The decision is in compliance with the approved policy and to enable community improvements.

**Implementation of Decision:**

The decision is proposed for implementation after the 3 day call-in period.

11. **COMMUNITY COUNCILS MINOR PROJECTS SCHEME – ONLLWYN  
COMMUNITY COUNCIL**

**Decision:**

That Members approve a grant of 70% of actual costs up to a maximum of £14,000 to Onllwyn Community Council.

**Reason for Proposed Decision**

The decision is in compliance with the approved policy and to enable community improvements.

**Implementation of Decision**

The decision is proposed for implementation after the 3 day call-in period.

12. **REBALLOT FOR THE PORT TALBOT BUSINESS IMPROVEMENT DISTRICT, VIVA PORT TALBOT**

**Decision:**

That Members approve the request from VIVA Port Talbot for the Council to act as Ballot Holder in the forthcoming ballot, at a cost of approximately £3,000 - £3,500.

**Reasons for Proposed Decision:**

In order to allow VIVA Port Talbot to fulfil their obligation to re-ballot their levy paying businesses.

**Implementation of Decision:**

The decisions will be implemented after the three day call in period.

13. **COMMERCIAL PROPERTY GRANT: REVIEW OF TERMS AND CONDITIONS**

**Decision:**

That it is recommended to extend the geographical eligibility of the CPG to all Wards within the County Borough.

**Reasons for Proposed Decision:**



To implement, as widely as possible, the provisions of the Commercial Property Grant scheme in accordance with the criteria and terms of administration of the grant, in order to contribute to the vicinity of Neath Port Talbot.

**Implementation of Decision:**

The decision is proposed for implementation after the three day call in period.

14. **UK SHARED PROSPERITY FUND - APPROVAL OF COMMUNITY FACILITIES IMPROVEMENT FUND PROJECTS**

Councillor S.Jones reaffirmed his interest, and left the meeting for this item.

**Decision:**

That having had due regard to the first stage of the Integrated Impact Assessment and following approval at the Funding Panel held on 29th August, it is recommended that:

- Members agree the recommendation to approve the following projects, which have Member involvement submitted under the Neath Port Talbot UK Shared Prosperity Fund (UKSPF) via the Community Facilities Improvement Fund, assuming that they were approved at the Funding Panel held on the 29th August:

- 1) Croeserw AFC – Road improvements/re-surfacing
- 2) Aberavon Greenstars RFC – Solar panel installation, phase 2
- 3) Cwmavon Community Engagement Centre – Kitchen upgrades

**Reasons for Proposed Decision:**

To enable Neath Port Talbot Council to implement the UKSPF Implementation Plan and advise applicants of the funding decision.

**Implementation of Decision:**

The decisions will be implemented after the three-day call-in process.

15. **LIST OF APPROVED CONTRACTORS**

**Decision:**

That having had due regard to the Integrated Impact Assessment it is recommended that:-

The List of Approved Contractors is amended as follows:-

Company to be added to the List of Approved Contractors.

The following company has applied to be included on the list and has passed the required assessments:-

<b><u>Company</u></b>	<b><u>Category</u></b>
Cambrensis Civil Engineering Ltd (C078)	76,80

Companies to be removed from the List of Approved Contractors

Removal of the following companies is required due to:-

M038 - Company is in Liquidation

R041 – Company failed H&S requirements & financial criteria

<b><u>Company</u></b>	<b><u>Category</u></b>
Mid Glam Construction Ltd (M038)	15,25,71,76,77,80,84
RTS Tree Specialist Ltd (R041)	2, 84 101,102

Category of work to be removed from an approved Contractor due to no H&S cover

<b><u>Company</u></b>	<b><u>Category</u></b>
Core Highways (Regions) Ltd (A035)	2

**NB** This company remains an approved contractor for Category 9 – Traffic Management.

**Reasons for Proposed Decision:**

To keep the List of Approved Contractors up to date and as far as possible, ensure a competitive procurement process. These recommendations to be adopted for the purpose of supplying a List of Approved Contractors for invitation to tender within the relevant category.

**Implementation of Decision:**

The decision is proposed for implementation after the three-day call-in period.

16. **PROCUREMENT STRATEGY**

**Decision:**

That having due regard to the integrated impact screening assessment that Cabinet considers and approves the Neath Port Talbot Council Procurement Strategy 2024-2028, which includes the Council's socially responsible procurement objectives, as enclosed at Appendix 1 of this Report.

**Reasons for Proposed Decision:**

The aim of this Procurement Strategy is to ensure adherence to new legislative requirements and have a framework in place so that procurement and commissioning decisions play a key role in supporting the delivery of the aims of the Council's Corporate Strategy and this Procurement Strategy.

**Implementation of Decision:**

The decision is proposed for implementation following the expiry of the three-day call-in process.

17. **LA GOVERNORS - AUTUMN TERM 2024**

**Decision:**

That, in line with approved policy, LA governor representatives be appointed to the existing and forthcoming vacancies set out in the attached appendix.

**Reasons for Proposed Decision:**

To enable the Authority to contribute to effective school governance through representation on school governing bodies.

**Implementation of Decision:**

The decision is proposed for implementation after the three-day call-in period.

18. **PART-NIGHT LIGHTING PILOT**

**Decision:**

That having had due regard to the first stage Integrated Impact Assessment, and the need to gather further information to complete a full assessment, it is recommended that Members approve the proposed part-night lighting pilot contained in the report.

**Reasons for Proposed Decision:**

To trial the implementation of part-night lighting for a short period to help assess the impact of such a measure and to inform future decision making.

**Implementation of Decision:**

The decision is proposed for implementation after the three day call in period.

19. **URGENT ITEMS**

There were no urgent items.

20. **ACCESS TO MEETINGS - EXCLUSION OF THE PUBLIC**

**RESOLVED:** That pursuant to Regulation 4 (3) and (5) of Statutory Instrument 2001 No 2290, the public be excluded for the following items of business which involved the likely disclosure of exempt information as defined in Paragraph 14 of Part 4 of Schedule.

21. **POSITIVE OUTCOMES PLAY SERVICE (EXEMPT UNDER PARAGRAPH 14)**

**Decision:**

1. The undertaking of a procurement exercise to commission a Positive Outcomes Play Service be agreed.
2. Following the procurement process, the Head of Children and Young Persons Services be granted delegated authority to enter into a contract with the winning bidder.

**Reasons for Proposed Decision:**

Undertaking a procurement exercise for the Positive Outcomes Play Service will ensure that the Council is legally compliant when purchasing this service. In addition, this will ensure that the Council is best placed to continue meeting the needs and demands of those that require this service through the purchasing of high quality and financially sustainable services.

**Implementation of Decision:**

The decision is proposed for implementation after the three day call in period.

22. **SUPPORTED LODGINGS SERVICE (EXEMPT UNDER PARAGRAPH 14)**

**Decision:**

That Members grant permission for officers to:

1. Conduct a 30 day consultation exercise.
2. Negotiate a contract end date with the existing Provider to cover the timeline of consultation and bringing the service in house if agreed.
3. Present a paper to Cabinet following the consultation period to report on the outcome and proposal to bring in house.

**Reasons for Proposed Decision:**

To take into account the social care resources available when undertaking an assessment or reassessment of individuals' needs; to ensure a sustainable range of good quality services are available to young people in Neath Port Talbot; to contribute towards the budgetary savings identified in the Council's Forward Financial Plan; and to contribute to Welsh Government's aim to rebalance the social care market by moving services away from for-profit organisations.

**Implementation of Decision:**

The decision is proposed for implementation after the three day call in period.

23. **LA GOVERNORS - AUTUMN TERM 2024 (EXEMPT UNDER PARAGRAPH 12)**

Councillor S.Knoyle reaffirmed his interest, and left the meeting for this item.

**Decision:**

That members supported the three LA Governors be removed.

**Reasons for Proposed Decision:**

To enable the Authority to contribute to effective school governance through representation on school governing bodies and consider the safeguarding arrangements.

**Implementation of Decision:**

Immediate implementation.

24. **HARDSHIP RELIEF (EXEMPT UNDER PARAGRAPH 14)**

**Decision:**

That the application was refused.

**Reason for Proposed Decision:**

Detailed in item 7.

**Implementation of Decision:**

The decision is proposed for implementation after the three day call in period.

**CHAIRPERSON**

**CABINET Forward Work Programmes 24/25**

Meeting Date	Agenda Item	TYPE	Contact Officer	Purpose of the report	Called for Scrutiny	Cabinet Portfolio Holder	Relevant scrutiny committee
Cabinet 23 <sup>rd</sup> October 2024	Outcome of Vehicle Procurement	For Decision	Mike Roberts/ David Griffiths	Seek Member approval to award a contract for the purchase of recycling collection vehicles and for associated funding.		Cllr. W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Health Protection Service – Consideration of the Swansea Bay Service Level Agreement	For Decision	Ceri Morris	To consider the Draft ‘Swansea Bay Service Level Agreement’ and to seek authorisation to enter into the agreement to deliver a partnership approach to health protection work.			
	Hillside Managers Report	For Monitoring	Keri Warren	PRIVATE ITEM	7 <sup>th</sup> November Post Scrutiny	Cllr. S.Harris Portfolio 6	Social Services, Housing and Community Safety
	Hillside Responsible Individuals Report	For Monitoring	Keri Warren	PRIVATE ITEM	7 <sup>th</sup> November Post Scrutiny	Cllr. S.Harris Portfolio 6	Social Services, Housing and Community Safety
	Active Travel Annual Report	For Monitoring	David Griffiths/ Amanda Phillips	Provides an overview of works completed and schemes under design development together with a breakdown of works funded out of the West Governments core allocation funding.		Cllr. W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Flood Risk Management Plan	For Decision	Mike Roberts/ Steve Owen		YES 19 <sup>th</sup> July	Cllr. S.Jones Portfolio 10	Environment, Regeneration and Streetscene Services
	Public Participation Strategy 2023-2027- Progress Report	For Monitoring	Caryn Furlow Harris Anita James	It will provide an update on the progress to date with the actions in the Public Participation Strategy. (Deferred from the 11 <sup>th</sup> September)	YES 17 <sup>th</sup> Oct	Leader Portfolio 1	Community, Finance and Strategic Leadership
	The Active Travel (Wales) Act 2023 – Neath Port Talbot Active Travel Delivery Plan (2024 – 2029)	For Decision	Amanda Phillips David W.Griffiths	This plan highlights the strategy and proposed actions for Members consideration that are needed to achieve two broad aims within the county borough. To set out the strategic vision for active travel in Neath Port Talbot and demonstrate the Councils aspirations on how the active travel network will be improved and extended in the next five years.	YES 20 <sup>th</sup> Sept	Cllr W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Blue Plaque Scheme	For Decision	Bethan Blackmore	A Commemorative Blue Plaque Scheme is intended to celebrate notable people, places and events within the county borough. Blue Plaques are one of the most effective and visible means of celebrating our history and the historic environment. Plaques connect the past and present, they can increase a sense of pride among local communities and can educate about history, making both more accessible to people of all ages and backgrounds.		Cllr Cen Phillips Portfolio 5	Education, Skills and Wellbeing
	Corporate Plan Annual Report 2023/2024	For Decision	Louise McAndrew/ Caryn Furlow- Harris	The purpose of the report is to approve the content of both the Corporate Plan Annual Report and Self- Assessment 2023 – 2024. Both documents reflect on progress made during 2023 – 2024. In relation to the delivery of the council’s well-being objectives and how well we performed as a council.	YES 17 <sup>th</sup> October	Cllr S.Hunt Portfolio 1	Community, Finance and Strategic Leadership
	Transfer Station Energy Contract	For Decision	Mike Roberts	Seek Member approval to enter into a contract for the supply of electricity to the Council’s Transfer Station at Crymlyn Burrows		Cllr. S.Jones Portfolio 10	Environment, Regeneration and Streetscene Services

	Viva Port Talbot Bid Renewal Ballot 2024	For Decision	Andrew Collins	To decide upon the NPT's vote in the ballot.	20 <sup>th</sup> September	Cllr. J.Hurley Portfolio 4	Environment, Regeneration and Streetscene Services
	Curriculum for Wales	For Monitoring	Mike Daley	To provide an update on the progress to date with the actions that schools have taken and the support they have received.	YES 5 <sup>th</sup> Dec	Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Implementation of the Additional Learning Needs and Education Tribunal (Wales) Act 2018 in non-maintained settings, primary and secondary schools and all age schools and into Post 16.	For Monitoring	Zoe Ashton-Thomas/ Sophie Griffiths	Provides an update on the progress to date with the actions that schools and the Local Authority have taken in meeting the statutory duties around ALNET implementation and the support schools have received.		Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Childcare Rents in School	For Decision	Sarah Griffiths/ Lisa Clement-Jones	This report will provide an evaluation of the Childcare Rents in Schools Pilot. It will also provide proposed recommendations based upon the evaluation of the pilot.	YES 12 <sup>th</sup> Sept	Cllr. N. Jenkins Portfolio 3	Education, Skills and Wellbeing
	<b>RECURRING ITEMS (IF NEEDED)</b>						
	Various Traffic Orders (Detail not available)	For Decision	David Griffiths	Various Traffic Orders (If Needed)		Cllr W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Various Land Disposal Reports (If needed)	For Decision	Simon Brennan	Land Disposal (If Needed)		Cllr J.Hurley Portfolio 4	Environment, Regeneration and Streetscene Services
	Select Lists	For Decision	David Griffiths			Cllr.W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Sevices
	Debt Write Offs	For Decision	Huw Jones			Cllr S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Miscellaneous Grant Applications	For Decision	Huw Jones			Cllr.S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership



Meeting Date	Agenda Item	TYPE	Contact Officer	Purpose of the Report	Called for Scrutiny	Cabinet Portfolio Holder	Relevant Scrutiny Committee
Cabinet  13 <sup>th</sup> November							
	Assessing Transport Suppliers and Drivers DBS (Home to School and Social Services Transport) Policy	For Decision	Brendan Griffiths/ David Griffiths	This will provide a new Passenger Transport DBS Policy that will guide operators through the application process, sets out the assessment criteria and an appeals process.		Cllr. W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Admission to Community Schools	For Decision	Helen Lewis/ Chris Millis	The Council is the admission authority for community schools in its area and is required to determine its admission arrangements.		Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	School Exclusion Update	For Monitoring	John Burge	Making Members aware of the exclusion information for the previous academic year.	24 <sup>th</sup> Oct	Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Complaints and Compliments Annual Report 2023/2024	For Monitoring	Caryn Furlow- Harris	To provide an overview of the number of compliments and complaints received during 2023 – 2024.	YES 17 <sup>th</sup> Oct	Cllr.S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Consideration of Ombudsman Annual Report	For Monitoring	Craig Griffiths			Cllr. S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Contract Procedure Rules	For Decision Commend to Council 27 <sup>th</sup> Nov 24	Craig Griffiths	To agree new standing orders and procedural rules for contracts that are entered into by Neath Port Talbot Council.	YES 17 <sup>th</sup> Oct	Cllr.S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Christmas New Year Opening Times – Libraries, Leisure Centres etc.	For Decision	Chris Saunders	Details of the Christmas and New Year Opening Times for Libraries and Leisure Centres etc.		Cllr.C.Phillips Portfolio 5	Education, Skills and Wellbieng
	Replacement Local Development Strategy 2023 – 2038 For Commending to Council for Approval	For Decision	Ceri Morris/ Lana Beynon			Cllr. W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Strategic School Improvement Programme Proposal to reorganise ALN provision at Cefn Saeson Comprehensive School	For Decision	Rhiannon Crowhurst	Permission to Consult on the Proposal	YES 24 <sup>th</sup> Oct	Cllr N.Jenkins Portfolio 3	Education, Skills and Culture
	Tree Policy and Operational Plan	For Decision	James Davies	An update to the Tree Policy and creation of a Tree Management Operational Plan.	YES 20 <sup>th</sup> Sept	Cllr. W. Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Management of Japanese Knotweed	For Decision	James Davies	Update on the treatment policy and operational plan.		Cllr. W. Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Arboricultural Management Plan	For Decision	James Davies		Yes 8 <sup>th</sup> Nov	Cllr. S.Jones Portfolio 10	Environment, Regeneration and Streetscene Services
	Pilot of Access Approach to Formal Parks and Gardens	For Decision	James Davies		?	Cllr.S.Jones Portfolio 10	Environment, Regeneration

							and Streetscene Services
Use of Containers on Safari Collections	For Decision	Mike Roberts	To establish policy regarding the use of containers as storage on black bag waste collection rounds.	NO	Cllr.S.Jones Portfolio 10	Environment, Regeneration and Streetscene Services	
Regional Transport Plan	For Monitoring	David Griffiths/ Amanda Phillips	This report provides Members with an overview of the duties of the Corporate Joint Committee that has been mandated to produce a Regional Transport Plan for Southwest Wales for Submission to Welsh Government in March 2025.		Cllr. W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services	
Disposal of Off Street Pay and Display Car Parks (Capacity and Utilization Review)	For Decision	David W Griffiths/ Ian Rees	This report considers surplus car parking capacity in the borough, income and expenditure with a view to reducing operational costs and to release the surplus land/buildings for potential re-development/regeneration or lease/asset transfer.	YES 8 <sup>th</sup> Nov Waiting Confirmation from Chair.	Cllr. W.Griffiths Portoflo 9	Environment, Regeneration and Streetscene Services	
Bus Franchising (Network Design)	For Decision	David Griffiths/ Brendan Griffiths	This report will set out the timeline for Bus Franchising and requires endorsement by Council of the new Bus Network that will operate in the County.		Cllr. W Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services.	
Permission to consult on Remodelling of Link	For Decision	Keri Warren Hayley Short		Yes 7 <sup>th</sup> November	Cllr. S. Harris Portfolio 6	Social Services, Housing and Community Safety.	
Rheola Estate – Next Steps	For Decision	Andrew Collins	To consider the options available to the Council following a legal request regarding title, from the current owners of the Rheola Estate	8 <sup>th</sup> Nov	Cllr.J.Hurley Portfolio 4	Environment, Regeneration and Streetscene Services	
Permission to Consult on the Remodelling of Park House	For Decision	Keri Warren Hayley Short		Yes 7 <sup>th</sup> November	Cllr. S.Harris Portfolio 6	Social Services, Housing and Community Safety	
Margam Park Business Plan	For Decision	Chris Saunders	To provide an update on the NHLF bid for castle, and a business plan to meet the MTFP targets for the park.	YES 24 <sup>th</sup> Oct	Cllr. C.Phillips Portfolio 5	Education, Skills and Wellbeing	
Welsh Public Library Standards	For Monitoring	Chris Saunders	Provides an update in respect of the authorities library service performance against current Welsh Language Standards (WPLS) Framework 6 and note the feedback, comments and recommendations in the Welsh Library Report.		Cllr.C.Phillips Portfolio 5	Education, Skills and Wellbeing	
Attendance in Schools	For Monitoring	John Burge	Overview of Attendance across all Schools	YES 24 <sup>th</sup> Oct	Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing	
School Budget Pressures	For Monitoring	Rhiannon Crowhurst		YES (POST) 5 <sup>th</sup> Dec	Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing	
Youth Engagement Strategy	For Decision	Rhiannon Crowhurst	Updated Strategy for Approval	YES 24 <sup>th</sup> Oct	Cllr N.Jenkins Portflio 3	Education, Skills and Wellbeing	
Leadership Strategy and its Impact on NPT Workforce in Schools	For Monitoring	Mike Daley	Provides an update on the Leadership Strategy and the impact it has had across all schools.		Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing	

	Teaching and Learning support and Development Programme	For Monitoring	Mike Daley	It will provide an update on the progress to date with the actions within the Teaching and Learning Programme across all clusters.		Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Directorate Improvement Plan and Service Plans From Education, Lifelong Learning	For Monitoring	Chris Millis		Yes 24 <sup>th</sup> Oct	Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	<b>RECURRING ITEMS (IF NEEDED)</b>						
	Various Traffic Orders (Detail not available)	For Decision	David Griffiths	Various Traffic Orders (If Needed)		Cllr W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Various Land Disposal Reports (If needed)	For Decision	Simon Brennan	Land Disposal (If Needed)		Cllr J.Hurley Portfolio 4	Environment, Regeneration and Streetscene Services
	Select Lists	For Decision	David Griffiths			Cllr.W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Debt Write Offs	For Decision	Huw Jones			Cllr.S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Miscellaneous Grant Applications	For Decision	Huw Jones			Cllr.S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership

Meeting Date	Agenda Item	TYPE	Contact Officer	Purpose of Report	Called for Scrutiny	Cabinet Portfolio Holder	Relevant Scrutiny Committee
Cabinet 4 <sup>th</sup> December	Revenue Budget Monitoring 24-25	For Decision	Huw Jones			Cllr. S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Capital Budget Monitoring 24-25	For Decision	Huw Jones			Cllr.S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Treasury Management Outturn 24-25	For Decision	Huw Jones			Cllr. S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Corporate Plan Six Month Update Quarter 1 and 2	For Monitoring	Louise McAndrew			Com. Finance 28 <sup>th</sup> November Edu 5 <sup>th</sup> Dec Env 6 <sup>th</sup> Dec Soc Ser 12 <sup>th</sup> Dec	All
	Support visits by Education Support Officers in Schools	For Monitoring	Mike Daley	Provides an update on the progress to date with the actions that follow any support visit across all our schools.		Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Self Assessment 2023/2024	For Decision	Louise McAndrew/ Anita James		YES 28 <sup>th</sup> Nov	Cllr. S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Strategic Equality Plan Annual Report 23/24	For Decision	Anita James/ Caryn Furlow- Harris	The Annual Report for 2023/2024 provides an account of progress in meeting the Public Sector Equality Duty and in particular against the equality objectives and actions set out in the Strategic Equality Plan.	YES 17 <sup>th</sup> Oct	Cllr.S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Community Focussed Schools	For Monitoring	Mike Daley	Provides an update on the progress of the Community Focussed Schools		Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Elective Home Education	For Monitoring	John Burge	All information available on children and young people who are now Educated at Home.		Cllr N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Highways Status and Options Report	For Decision	Mike Roberts	Awaiting Detail		Cllr.S.Jones Portfolio 10	Environment, Rgeneration and Streetscene Services
	Improving Recycling Performance Report	For Decision	Mike Roberts		YES 8 <sup>th</sup> Nov	Cllr. S.Jones Portfolio 10	Environment, Regeneration and Streetscene Services
	Permission to tender Domicilliary Care Framework	For Decision	Angela Thomas		Yes 7 <sup>th</sup> November	Cllr. J. Hale Portfolio 7	Social Services, Housing and Community Safety.
	Direct Payment Whole Service Review this includes the Direct Payments Payroll Service Review	For Decision	Angela Thomas		Yes 7 <sup>th</sup> November	Cllr. J.Hale Portfolio 7	Social Services, Housing and Community Safety

Permission to extend Contract Arrangements for the Prevention of Wellbeing Service	For Decision	Chele Howard		No	Cllr. J.Hale Portfolio 7	Social Services, Housing and Community Safety.
Appointment of LA Governors	For Decision	John Burge		No	Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing
<b>RECURRING ITEMS (IF NEEDED)</b>						
Various Traffic Orders (Detail not available)	For Decision	David Griffiths			Cllr W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
Various Land Disposal Reports (If Needed)	For Decision	Simon Brennan			Cllr J.Hurley Portfolio 4	Environment, Regeneration and Streetscene Services
Select Lists	For Decision	David Griffiths			Cllr. W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
Debt Write Offs	For Decision	Huw Jones			Cllr. S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
Miscellaneous Grant Applications	For Decision	Huw Jones			Cllr.S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership

Meeting Date	Agenda Item	TYPE	Contact Officer	Purpose of Report	Called for Scrutiny	Cabinet Portfolio Holder	Relevant Scrutiny Committee
Cabinet 15 <sup>th</sup> January 2025	Hillside Managers Report	For Monitoring	Keri Warren	Private Item		Cllr. S.Harris Portfolio 6	Social Services, Housing and Community Safety
	Hillside Responsible Individuals Report	For Monitoring	Keri Warren	Private Item		Cllr.S.Harris Portfolio 6	Social Services, Housing and Community Safety
	Updating the Side Waste Policy	For Decision	Mike Roberts	To seek Member approval for an updated Side Waste Policy (further to Measure 6 of the approved Waste Strategy Action Plan)	Awaiting Confirmation  6 <sup>th</sup> Dec	Cllr.S.Jones Portfolio 10	Environment, Regeneration and Streetscene Services
	Permission to Tender a Carers Service	For Decision	Hayley Short			Cllr. J.Hale Porfolio 7	Social Services, Housing and Community Safety
	Regeneration Strategy	For Decision	Andrew Collins	Work is being undertaken to produce a strategy which will form a reference and guide for future Regeneration Projects going forward	YES 6 <sup>th</sup> Dec	Cllr.J.Hurley Portfolio 4	Environment, Regeneration and Streetscene Services
	Permission to tender a Housing First Service	For Decision	Chele Howard/ Hayley Short		No	Cllr. A. Llewelyn Portfolio 8	Social Services, Housing and Community Safety
	Education, Leisure and Lifelong Learning Strategic Development Plan.	For Monitoring	Chris Millis	Provides an Update on the Progress to date with the Actions from within the Education, Leisure and Lifelong Learning Strategic Development Plan.	YES 5 <sup>th</sup> Dec	Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Report on HWRC Feasibility	For Decision	Mike Roberts	To inform Members on the outcome of feasibility work into suitable sites for a new HRWC in the Afan Valley area, and seek a decision regarding further work or not (further to Measure 17 of the approved Waste Strategy Action Plan)	Awaiting Confirmation  6 <sup>th</sup> Dec	Cllr. S.Jones, Portfolio 10	Environment, Regeneration and Streetscene Services
	Impact of the Support by Case Assessment and Progression Team.	For Monitoring	John Burge	It will provide an update on the progress to date with the actions from the Case Assessment Progression Team.		Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Vulnerable Learners Service	For Monitoring	John Burge	Update on the support offered by the Vulnerable Learners Service and the impact it has had on pupils and families in NPT		Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Various Traffic Orders (Detail not available)	For Decision	David Griffiths			Cllr W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Various Land Disposal Reports (If Needed)	For Decision	Simon Brennan			Cllr J.Hurley Portfolio 4	Environment, Regeneration and Streetscene Services.

Meeting Date	Agenda Item	TYPE	Contact Officer	Purpose of Report	Called for Scrutiny	Cabinet Portfolio Holder	Relevant Scrutiny Committee
Cabinet 5 <sup>th</sup> February 2025							
	Fleet and Heavy Plant Renewals	For Decision	Kevin Lewis	This report seeks approval to procure new and replacement vehicles and heavy plant in 2025/2026 that has reached the end of their economic life cycle and require replacement in line with the Authority's Fleet Renewals Programme.	YES 6 <sup>th</sup> Dec	Cllr. W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Social Services Directors Annual Report	For Decision (Commending to Council)	Andrew Jarrett			Report of the Director of Social Services.	Social Services, Housing and Community Safety
	Strategic Risk Register	For Monitoring	Caryn Furlow-Harris		YES 9 <sup>th</sup> Jan	Cllr.S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Neath Port Talbot Events Strategy	For Decision	Chris Saunders		YES 16 <sup>th</sup> Jan	Cllr.C.Phillips Portfolio 5	Education, Skills and Wellbeing
	Permission to tender Accommodation Models for Young People	For Decision	Keri Warren	Private Item	Yes 23 <sup>rd</sup> Jan	Cllr. S.Harris Portfolio 6	Social Services, Housing and Community Safety
	Library Strategy	For Decision		To approve the Library Strategy		Cllr.C.Phillips Portfolio 5	Education, Skills and Wellbeing
	Young People Housing Support Grant Funded Services (Permission to Re-tender).	For Decision	Hayley Short/ Chele Howard	Proposal for the recommissioning of Young People Housing Support Grant Funded Services		Cllr. A.Llewelyn Portfolio 8	Social Services, Housing and Community Safety
	Aberavon Seafront Masterplan	For Decision	Chris Saunders	To adopt the Seafront Strategy	Scrutiny 16 <sup>th</sup> Jan	Cllr. Cen Phillips Portfolio 5	Education, Skills and Wellbeing
	Permission to Tender Supported Accommodation	For Decision	Hayley Short	Private Item		Cllr.A.Llewelyn Portfolio 8	Education, Skills and Wellbeing
	Permission to Tender for Emergency Accommodation for Women – Violence Against Women, Domestic Abuse and Sexual Violence.	For Decision	Chele Howard/ Hayley Short	To feedback on the outcome of the consultation for the proposed remodel of emergency accommodation and seek permission to retender VAWDASV Emergency Accommodation on the feedback.	Yes, 23 <sup>rd</sup> Jan	Cllr. A.Llewelyn Portfolio 8	Social Services, Housing and Community Safety.
	Various Traffic Orders (Detail not available)	For Decision	David Griffiths			Cllr W.Griffiths Portfolio 9	Environment, Regeneration and Streetscene Services
	Various Land Disposal Reports (If Needed)	For Decision	Simon Brennan			Cllr J.Hurley Portfolio 4	Environment, Regeneration and Streetscene Services

Meeting Date	Agenda Item	TYPE	Contact Officer	Purpose of Report	Called for Scrutiny	Cabinet Portfolio Holder	Relevant Scrutiny committee
Cabinet 26 <sup>th</sup> February  <u>BUDGET</u> <u>25/26</u>	Revenue Budget Monitoring 24-25	For Decision	Huw Jones			Cllr.S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Capital Budget Monitoring 24-25	For Decision	Huw Jones			Cllr. S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Treasury Management Outturn 24-25	For Decision	Huw Jones			Cllr. S.Knoyle Portfolio 2	Community, Finance and Strategic Leadership
	Education Development – Local Authority Education Grant Spending Plan 2024 -2025.	For Monitoring	Mike Daley	Provides an update on the progress to date with the actions from the grant.		Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Safeguarding Support within Schools	For Monitoring	John Burge	Overview of all Safeguarding Advice and Training offered to Schools	YES 16 <sup>th</sup> Jan	Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Appointment and Removal of Local Authority Governor Representatives	For Decision	John Burge	Information on the Appointment and Removal of Local Authority Governor Representatives		Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	An overview of the Families First Programme	For Information	Sarah Griffiths/ Allison Harris	The report will provide an overview of the Families First Early Intervention support services available to children, young people and families. It will also provide 2023/2024 data demonstrating the impact of the programme on children, young people and families who have accessed the service.		Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Strategic Schools Improvement Programme Proposal to reorganise ALN Provision at Cwmtawe Comprehensive School	For Decision	Rhiannon Crowhurst	Results of Consultation and permission to advertise Notice for Objections		Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Strategic Schools Improvement Programme Proposal to re-organise ALN Provision at Cefn Saeson Comprehensive School.	For Decision	Rhiannon Crowhurst	Results of Consultation and permission to advertise Notice for Objections		Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Various Traffic Orders (Detail not available)	For Decision	David Griffiths			Cllr W.Griffiths Portfolio 9	
Various Land Disposal Reports (If Needed)	For Decision	Simon Brennan			Cllr J.Hurley Portfolio 4		



Meeting Date	Agenda Item	TYPE	Contact Officer	Purpose of Report	Called for Scrutiny	Cabinet Portfolio Holder	Relevant Scrutiny committee
Cabinet 19 <sup>th</sup> March	Period Dignity Report	For Monitoring	John Burge	Report on the spend and implementation of Period Dignity Scheme.		Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Family Support in the Early Years. An overview of the family support provided by the Early Years and Flying Start Family Support Team.	For Information	Sarah Griffiths/ Lisa Clement-Jones	This report will provide an overview of the collaborative work across the Local Authority and Health in relation to providing equitable early help for children and families in the Early Years.	YES 6 <sup>th</sup> March	Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Updating the Missed Bin Policy	For Decision	Mike Roberts	To seek Member approval for an updated Missed Bin Policy (further to the implementation of Measure 1 of the approved Waste Strategy Action Plan, once completed)		Cllr.S.Jones Portfolio 10	Environment, Regeneration and Streetscene Services
	Healthy Relationships for Stronger Communities Strategy	For Monitoring	Chele Howard/Elinor Wellington	12 Month Update		Cllr. A.Llewelyn Portfolio 8	Social Services, Housing and Community Safety
	Various Traffic Orders (Detail not available)	For Decision	David Griffiths			Cllr W.Griffiths Portfolio 9	
	Various Land Disposal Reports (If Needed)	For Decision	Simon Brennan			Cllr J.Hurley Portfolio 4	

Meeting Date	Agenda Item	TYPE	Contact Officer	Purpose of Report	Called for Scrutiny	Cabinet Portfolio Holder	Relevant Scrutiny committee
Cabinet 9 <sup>th</sup> April	Social Services Complaints Annual Report	For Monitoring	Leighton Jones			Cllr.A.Llewellyn Portfolio 8  Cllr S.Harris Portfolio 6  Cllr J Hale Portfolio 7	Social Services, Housing and Community Safety
	Community Safety Strategic Intent Document	For Monitoring	Chele Howard/ Elinor Wellington	12 Month Update		Cllr. A. Llewelyn Portfolio 8	Social Services, Housing and Community Safety
	Permission to Consult and Pilot an Alternative Night Time Support Report	For Decision	Keri Warren/ Hayley Short		Yes, 13 <sup>th</sup> March 2025	Cllr.S.Harris Portfolio 6	Social Services, Housing and Community Safety
	Various Traffic Orders (Detail not available)	For Decision	David Griffiths			Cllr W.Griffiths Portfolio 9	
	Various Land Disposal Reports (If Needed)	For Decision	Simon Brennan			Cllr J.Hurley Portfolio 4	

Meeting Date	Agenda Item	TYPE	Contact Officer	Purpose of Report	Called for Scrutiny	Cabinet Portfolio Holder	Relevant Scrutiny committee
Cabinet 30 <sup>th</sup> April							
	Hillside Managers Report	For Monitoring	Keri Warren			Cllr.S.Harris Portfolio 6	
	Hillside Responsible Individuals Report	For Monitoring	Keri Warren			Cllr.S.Harris Portfolio 6	
	Early Years and Flying Start Childcare	For Monitoring	Sarah Griffiths/Lisa Clement-Jones	This report will provide information in relation to the Early Years and Flying Start Childcare Sector including the impact of Flying Start Expansion.	YES 10 <sup>th</sup> April	Cllr.N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Various Traffic Orders (Detail not available)	For Decision	David Griffiths			Cllr W.Griffiths Portfolio 9	
	Various Land Disposal Reports (If Needed)	For Decision	Simon Brennan			Cllr J.Hurley Portfolio 4	

Meeting Date	Agenda Item	TYPE	Contact Officer	Purpose of Report	Called for Scrutiny	Cabinet Portfolio Holder	Relevant Scrutiny committee
Cabinet 21 <sup>st</sup> May							
	Strategic Schools Improvement Programme Proposal to reorganise ALN provision at Cwmtawe Comprehensive School	For Decision	Rhiannon Crowhurst	Final Determination of the Proposal		Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing
	Strategic Schools Improvement Programme Proposal to reorganise ALN provision at Cefn Season Comprehensive School	For Decision	Rhiannon Crowhurst	Final Determination of the Proposal		Cllr. N.Jenkins Portfolio 3	Education, Skills and Wellbeing.
	Various Traffic Orders (Detail not available)	For Decision	David Griffiths				Cllr W.Griffiths Portfolio 9
Various Land Disposal Reports (If Needed)	For Decision	Simon Brennan				Cllr J.Hurley Portfolio 4	

## 2025/26 Budget progress report

### Cabinet

2<sup>nd</sup> October 2024

### Report of the Corporate Directors' Group

#### **Purpose**

To update Cabinet in relation to savings and income generation proposals being developed for 2025/26 and to seek authority to undertake early engagement work.

#### **Executive Summary**

On 26<sup>th</sup> July 2024 Council received a 'Budget Outlook' report which set out the extremely challenging financial position facing the Council for the 2025/26 financial year. The report detailed inflationary pressures of £12.9m and unavoidable services pressures of £9.7m which amounted to an increase in cost for 2025/26 of £22.6m. The report also explained that councils had been advised to plan on no increase to the Revenue Support Grant (RSG).

At the same meeting, following consideration of the report, the Council unanimously approved a Notice of Motion and resolved that:

- Members note the serious implications that will stem from no increases to the Revenue Support Grant in 2025/26 on services, jobs, fees and charges and council tax levels.
- The Leader of Neath Port Talbot County Borough Council, on behalf of all elected members, write to UK and Welsh Government highlighting the pressures which are identified in this motion and expressing serious concern over the potential for no uplift to the revenue support grant and to call on UK and Welsh Government to provide adequate funding to enable the sustainability of councils.

A copy of the letter sent by the Leader of Council following the meeting is appended at Appendix 1 for information. A response from both the UK and Welsh governments is still awaited.

On 24<sup>th</sup> July 2024, the Chancellor of the Exchequer updated Parliament on the state of public finances. She reported a £22 billion shortfall in the current financial year (2024/25). At a press conference on 27<sup>th</sup> August 2024, the Prime Minister reinforced the message given by the Chancellor and indicated that the Budget announcement scheduled for October 2024 would be painful with the Government asking the public to accept short term pain for long term gain.

The announcements made by the UK Government since the Budget Outlook report was considered by Council in July 2024, suggests that it is prudent to plan on the basis of the 2025/26 financial year being difficult. Given the immensely challenging situation set out in the Budget Outlook report, there has been an intense focus on finding savings, new income and other measures to address the budget gap. Budget reductions of 5% have been applied across the Council for 2025/26. This report provides the Cabinet with details of the work undertaken by Officers to date in developing savings and income generation proposals to assist in closing this budget gap; and seeks permission to undertake early engagement work with staff, our communities and our wider partners in relation to these early proposals.

### **Budget gap**

#### **Pay and Inflation**

The economic environment has seen significant fluctuations in recent years, notably in inflation rates. These fluctuations have direct consequences on budgeting for pay awards and external contracts. Local authorities must account for these changes to ensure financial stability and effective service delivery.

#### **General Inflation**

Inflation has stabilised at around 2% after peaking at 11.1% in October 2022. Despite the reduction, many goods and services remain costlier than before.

#### **Pay Awards**

The pay negotiations for April 2024 are still ongoing. Whilst the First Minister has recently announced she will provide some additional funding for teachers pay which has been settled at 5.5% and will make some additional funding available for Green Book employees, we have yet to see the detail of these announcements and do not expect confirmation for some time that any additional funding will be recurrent. Any pay award exceeding the budget

provision must be incorporated into the 2025/26 budget strategy. The medium-term financial plan (MTFP) assumes a 3% annual increase in pay for the next five years.

#### National Minimum Wage (NMW)

The latest estimated increase in NMW ranges from 1.49% to 6.47%, with a likely increase of 3.93%. Many external contracts require an uplift in line with NMW, adding pressure to the budget.

#### Inflation

Based on the current modelling, the total inflationary pressure for 2025/26 amounts to £12.9m. A range of modelling has also taken place which shows a range from a 'better case' inflation pressure of £7m to a 'worse case' pressure of £20m.

#### Revenue Support Grant

The Welsh Government has advised local authorities to plan for no uplift in the Revenue Support Grant (RSG). Recent announcements from the UK Government around additional teaching capacity in England suggests that Wales may receive a consequential increase in funding through the Barnett formula, although it now seems likely this will be absorbed by pay increases. As a result of this we are currently modelling a 0.5% increase in the RSG.

### **Unavoidable Service Pressures 2025/26**

Whilst inflation, BREXIT impacts and pay awards continue to be reflected in higher prices, we are seeing significant increases in demand in key areas of service, further exacerbating the position. We are also now experiencing the consequences of constrained capital investment in infrastructure with significantly increased risk across all categories of assets.

These pressures are not unique to NPT but are structural problems being experienced by all councils.

The medium term financial plan includes service pressures totalling £9.7m in 2025/26. These pressures are detailed in the table overleaf:

Directorate	Detail	£'000 2025/26
<b><u>Schools</u></b>		
Schools	Welsh Medium Starter School Neath Abbey	350
Schools	Address historical shortfall in teaching assistant funding	750
<b>Total Schools</b>		<b>1,100</b>
<b><u>Education, Leisure &amp; Lifelong Learning (ELLL)</u></b>		<b>£'000 2025/26</b>
Leisure	Additional cost of running indoor leisure if insured	1,300
<b>Total ELLL</b>		<b>1,300</b>
<b><u>Environment (ENV)</u></b>		<b>£'000 2025/26</b>
Environment	Core fund posts funded from service resilience reserve	500
<b>Total ENV</b>		<b>500</b>
<b><u>Social Services, Housing and Community Safety (SSH&amp;CS)</u></b>		<b>£'000 2025/26</b>
Adult Services	Increase in base budget to meet current cost	5,700
Housing and Homelessness	Increased cost of provision	1,100
<b>Total SSH&amp;CS</b>		<b>6,800</b>
<b>Grand total funded unavoidable service pressures</b>		<b>9,700</b>

### Overview of the Budget Gap

Based on the latest assumptions we expect our costs to increase by c£22.6m next year (£12.9m inflation and £9.7m service pressures).

An increase in the RSG of 0.5% would mean that the Council receives an additional c£1.4m in funding which would reduce the £22.6m gap referred to above to £21.2m.



## **Savings and income generation proposals**

Over the course of the summer, Directorate management teams have been working to identify savings and income generation proposals equivalent to a total of 5% of each Directorate budget.

To date c£11.8m of proposals have been identified and these are detailed in Appendix 2 of this report.

The purpose of reporting these to Cabinet at this early stage is to enable early engagement to be undertaken with staff; our communities and wider partners.

Early publication of the proposals also gives scrutiny committees more time to assess proposals and contribute to the overall exercise. If Cabinet agree the recommendation within this report the Chair of each Scrutiny Committee will receive a formal request from the Cabinet Member for Finance, Performance and Social Justice to scrutinise the proposals and help shape proposals which will then form part of the formal consultation process that will be conducted later this year.

## **Next Steps**

These preliminary proposals will be shared with:

- All members of Council;
- The workforce;
- Trade unions;
- Public Services Board partners;
- Town and Community Councils;
- Members of the Senedd;
- Members of Parliament;

A range of opportunities to engage with residents and businesses will also be arranged.

Feedback on these initial proposals will be sought by early November so that proposals can be revised in light of feedback and final proposals developed which will then be subject to further consultation.

During this period, officers will also consult with colleagues across Wales to identify if there are ideas/initiatives being developed in other parts of Wales

that could be considered for inclusion in the final budget proposals. Cabinet members will also participate in the Welsh Local Government Association arrangements to help shape the representations made into Government with a view to securing a fairer share of available resources for local government.

### **Financial Impacts:**

The report details a number of proposals which will be the subject of various engagement activities. No decisions are being sought in terms of agreeing proposals for formal consultation at this stage.

### **Integrated Impact Assessment:**

There is no requirement to undertake an Integrated Impact Assessment as this report is for information purposes. Individual budget proposals will be subject to the IIA process in due course with an overarching statement of impact included within the final budget report.

### **Valleys Communities Impacts:**

The scale of the budget challenges are likely to impact every community across NPT.

### **Workforce Impacts:**

The budget scenarios referenced are likely to see a reduction in the overall size of the workforce, together with changes to the way services are to be delivered. As proposals are firmed up, they will be subject to the usual social partnership arrangements and the impacts of changes on the workforce will be reported as part of the budget process.

### **Legal Impacts:**

The Council has a legal duty to set a lawful budget by the 11 March (Local Government Finance Act 1992). Members jointly and severally (individually and collectively) have a fiduciary duty to council tax payers so they have a duty to facilitate the setting of a lawful budget, a process that requires flexibility and compromise. Failure to set a lawful budget in time will lead to loss of revenue – through not collecting council tax – both for the council and the precepting authorities such as the police and Town/Parish councils, significant additional administrative costs as well as reputational damage.

Section 151 of the Local Government Act 1972 requires the Council to make proper arrangements for its financial affairs and appoint an officer to have responsibility for those arrangements (the Chief Finance Officer) and who must ensure that a local authority's financial functions are fit for purpose.

Section 25 of the Local Government Act 2003 also requires the Chief Financial Officer to report to Council on the "robustness of the estimates" used in calculating the budget requirement. In the event that a Council incurs expenditure which is not approved or unlawful, the S151 Officer has the power to issue a notice providing that no new expenditure is permitted except to fund statutory services although existing commitments and contracts are honoured, and staff wages are paid. Councillors must then meet within 21 days to discuss the situation and consider what action to take.

### **Risk Management Impacts:**

Risks will be assessed in more detail as the response to the budget gap is developed over the coming months.

### **Consultation:**

There is no requirement for formal external consultation on this item however, if approved, it is proposed that early engagement activity be undertaken with staff; our communities and partners.

## **Recommendations:**

That Cabinet approve:

- Early engagement be undertaken on the c£11.8m of savings and income generation proposals detailed in Appendix 2 of this report.

## **Reasons for Proposed Decision:**

To seek feedback on the savings and income generation proposals developed to date.

## **Implementation of decision:**

The recommendation(s) are subject to a three day call in period.

## **Appendices:**

Appendix 1 – Copy of letter by the Leader of Council

Appendix 2 - Schedule of savings and income generation proposals

## **Officer Contacts**

Mrs Karen Jones, Chief Executive  
[Chief.executive@npt.gov.uk](mailto:Chief.executive@npt.gov.uk)

Mr Andrew Jarrett, Corporate Director of Social Services, Housing and  
Community Safety  
[a.jarrett@npt.gov.uk](mailto:a.jarrett@npt.gov.uk)

Mr Andrew Thomas, Corporate Director of Education, Leisure and Lifelong  
Learning  
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Ms Nicola Pearce, Corporate Director of Environment and Regeneration  
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Mr Noelwyn Daniel, Corporate Director of Strategy Corporate Services  
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Mr Huw Jones, Director of Finance  
[h.jones@npt.gov.uk](mailto:h.jones@npt.gov.uk)

Mr Craig Griffiths, Head of Legal and Democratic Services  
[c.griffiths2@npt.gov.uk](mailto:c.griffiths2@npt.gov.uk)

## Appendix 1 – Copy of letter send by the Leader of Council

Dyddiad/ Date 20 August 2024  
Rhif Ffôn/ Direct Line 01639 763309  
Ebostr/ Email [leader@npt.gov.uk](mailto:leader@npt.gov.uk)  
Cyswllt/ Contact  
Eich cyf/ Your ref  
  
Ein cyf/ Our ref SH/SC

The Rt Hon Rachel Reeves MP  
Chancellor of the Exchequer  
House of Commons  
London  
SW1A 0AA

Rebecca Evans MS  
Cabinet Secretary for Finance, Constitution & the Cabinet Office  
Welsh Government  
5th Floor  
Tŷ Hywel  
Cardiff Bay  
CF99 1SN

***Sent by email only to: [rachel.reeves.mp@parliament.uk](mailto:rachel.reeves.mp@parliament.uk) / [Rebecca.Evans@gov.wales](mailto:Rebecca.Evans@gov.wales)***

Dear Chancellor / Cabinet Secretary

### **Financial Outlook for Local Government**

The detail of the statement issued by the Cabinet Secretary for Finance, Constitution and the Cabinet Office on 11<sup>th</sup> June 2024, which described the financial outlook facing public services in Wales, was received at a meeting of the full Council on 26<sup>th</sup> July 2024.

Council considered the advice of its professional officers regarding the potential impact of no increase to the Revenue Settlement Grant in 2025-26 following two financial years where new pressures of £70 million were identified, significantly greater than the £26.9 million additional RSG received for the same period.

At the same meeting, a cross-party Notice of Motion was debated and it was resolved that I should write to you and the Chancellor of the Exchequer highlighting the pressures we face; the serious consequences that will flow from no uplift to the RSG; and urging both governments to make adequate funding available to ensure the sustainability of councils.

Recent years have been characterised by considerable volatility as a result of global and domestic events. The impacts have been enormous and continue to place unprecedented pressure on our organisation and wider communities:

/Cont.....

## Appendix 1 – Copy of letter send by the Leader of Council

- The pandemic has left a significant legacy with high numbers of people needing help from social services, homelessness services, more young people presenting with additional learning needs; and more young people needing help to attend school and participate in their education. The level of need significantly exceeds that seen pre-pandemic and continues to rise;
- Energy prices, general inflation and interest rates have sharply increased. Although inflation has return to around 2%, many goods and service remain more costly and energy prices and interest rates remain high;
- The cost of living crisis continues to impact a growing number of residents and local businesses. A recent report from our Poverty Prevention Partnership shows a growing number of local people getting into debt to cover day to day living costs;
- The labour market has changed with a worrying number of people now economically inactive and not looking for work. In contrast, it is becoming more difficult to fill roles in our local economy due to the supply of labour not matching demand – this is reflecting in higher wages which we cannot match in the public sector with a negative consequential impact on our capacity and capability;
- Capital projects have become more difficult to deliver as a result of a combination of the above, constraining our ability to grow the local economy. We are also experiencing increased levels of risk of failure in our infrastructure following years when government investment did not keep pace with requirements;
- The impact of the decarbonisation of Tata Steel UK Ltd’s Port Talbot plant is estimated to have a negative impact on the local economy of circa 14%. It will be crucial that the Transition Board provides the assistance the Council will need in the short, medium and long term to support those impacted and to ensure the regeneration of the area to secure a just transition. This is an area that already bears deep scarring from the deindustrialisation of the coal mining industry, the withdrawal of oil and chemical industries and the downsizing of operations at the steel plant.

Whilst we recognise the challenges both governments face, the prospect of no additional funding for local government is extremely concerning. The Council has a strong track record for sound financial management and continues to evolve its response to meet need in different ways, but the prospect of further, significant cuts in funding will result in deep cuts to our services and functions, together with further job losses, increases in fees and charges and council tax levels to achieve a balanced budget. The impact of all of this will likely impact on those facing the greatest inequality and hardship and will compound the structural poverty and deprivation that has affected these areas for too long.

Members of all political groups call on both the UK and Welsh governments to work together to advance policies that will avoid these impacts and to work with local government leaders to protect our communities against further hardship; to grow our economy; and to invest in our public services so that all of our citizens have an equal chance to get on in life.

Yours faithfully



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**Cllr Steve Hunt**  
**Leader of Neath Port Talbot Council**

## Appendix 2 – Savings and income generation proposals

Directorate	Chief Officer	Reference	Service Area	Description of how budget reduction will be delivered	£
ELLL	Chris Saunders	ELLL-A	Margam Country Park	Staff changes and possible reductions. Driving income through changes to the car parking arrangements, increasing the programme of events	150,000
ELLL	Chris Saunders	ELLL-B	Pontardawe Arts Centre	New cinema and improved catering arrangements	40,000
ELLL	Chris Saunders	ELLL-C	Indoor leisure	Indoor Leisure - trading improvements & cost reduction	175,000
ELLL	Chris Saunders	ELLL-D	Indoor Leisure	Temporary estimated full year saving from the closure of Pontardawe Swimming Pool on H&S grounds.	233,250
ELLL	Chris Saunders	ELLL-E	Aberafan Seafront	Additional/funfair and events	25,000
ELLL	Chris Saunders	ELLL-F	Education Learning Resource Service	Increased income target	10,000
ELLL	Chris Saunders	ELLL-G	Libraries	Reduce resources budget - stop purchase of DVD's	10,000
ELLL	Rhiannon Crowhurst	ELLL-H	Home to school transport	Externally led review of all existing arrangements	500,000
ELLL	Rhiannon Crowhurst	ELLL-I	Primary school cleaning	Full cost recovery - Increase cleaning recharge to schools phased over three years	317,000
ELLL	Rhiannon Crowhurst	ELLL-J	Education Support Services	Reducing hours and service remodelling	80,000
ELLL	Chris Millis	ELLL-K	Education Development Service	Reduce staff costs/offset against specific grant	25,000
ELLL	Andrew Thomas	ELLL-L	Pension & Early Retirement	Core budget requirement has reduced	15,000
ELLL	Hayley Lervy	ELLL-M	Education Psychology Service	Offset costs against grant	9,000
ELLL	Hayley Lervy	ELLL-N	Specialist Commissioning for Schools	This saving will be for one year only. OT post commissioned from Health will be funded from reserves instead of core.	55,000
ELLL	Hayley Lervy	ELLL-O	Learning Difficulty Team	Staff costs offset against grant funding.	12,000



## Appendix 2 – Savings and income generation proposals

Directorate	Chief Officer	Reference	Service Area	Description of how budget reduction will be delivered	£
ENV	David Griffiths	ENV-A	SAB & Highway Development Control	Increase in fees and charges	11,000
ENV	David Griffiths	ENV-B	Transport Support	Reduction on the Council revenue spent on local bus support and utilising Welsh Government grants only to support the bus network.	75,000
ENV	David Griffiths	ENV-C	Community Services Transport Unit	Cutting on call rota saving £10,000 and relying instead on private transport providers	10,000
ENV	David Griffiths	ENV-D	Transport Management	Increase in charges to external organisations using the councils fleet repair services	6,200
ENV	David Griffiths	ENV-E	Transport Maintenance	Additional External Income.	1,800
ENV	David Griffiths	ENV-F	Road Safety	Increased charges on training courses provided to external organisations.	14,000
ENV	David Griffiths	ENV-G	Maintenance - Bridges	Reduction of the maintenance budget which is relied upon for bridge inspection works and regular small scale maintenance. The budget also covers retaining structures.	28,000
ENV	Nicola Pearce	ENV-H	Corporate	Savings to budget as the reimbursements required by City and County of swansea Pension Fund gradually decrease.	42,000
ENV	Michael Roberts	ENV-I	Maintenance - NetMan	Reduce Asset Surveys budget from £98K to £87K.	11,000
ENV	Michael Roberts	ENV-J	Maintenance - Reactive	Reduce the number of drainage repair teams from two to one saving £130K. Reduce Highway Reactive Maintenance Budget by £80k	210,000

## Appendix 2 – Savings and income generation proposals

Directorate	Chief Officer	Reference	Service Area	Description of how budget reduction will be delivered	£
ENV	Michael Roberts	ENV-K	Maintenance - Day to day	<p>Tarmacked Bridleways - break up when next in need of repair and revert to unmade standard Rights of Way surfaces so the allocated £17K highway budget can be saved.</p> <p>Increase fees and charges for use of the highway by 10% or in line with Swansea whichever is the greater to increase income by £50K</p> <p>Reduce day to day works budget allocations for road assets - markings, signs, speed cushions, safety fences, cattle grids and the like by £105K plus reduce the consultancy support budget used for drainage feasibility work by 50% saving £25K</p>	195,000
ENV	Michael Roberts	ENV-L	Lighting Services	<p>Start street lighting dimming earlier at 22.00hrs as opposed to 01.00hrs - Lighting would dim earlier and higher profile (£22k)</p>	30,000
				<p>Trim' lights to shorten 'on-time' by some 20 mins per day, with around a 10 minute saving at start and end of each night time but remaining compliant with the ILP guide suggests these values can be lowered to 20 and 10 lux respectively. (£8k)</p>	
ENV	Michael Roberts	ENV-M	Neighbourhood Management - Services	<p>A reduction in the number of employees that deliver functions associated with litter i.e. litter and dog bin emptying and lining, litter picking etc.</p>	379,000
				<p>Reduce staff posts in fast roads teams. They set up and manage traffic management on A, B and other high risk roads to facilitate various tasks and often undertake a number of these tasks themselves e.g. litter picking.</p>	
				<p>A reduction in the number of seasonal staff.</p>	
				<p>Grimebuster' - Reduce the staff within this team and use staff from elsewhere in the service to carry out the work as and when required.</p>	

## Appendix 2 – Savings and income generation proposals

Directorate	Chief Officer	Reference	Service Area	Description of how budget reduction will be delivered	£
ENV	Michael Roberts	ENV-N	Refuse and Recycling Collection	3 Weekly Refuse Collections together with the introduction of Green Waste Collection Charges. Collection of Absorbent hygiene products, green waste and all other recyclables would be on a weekly basis.	539,000
ENV	Michael Roberts	ENV-O	Waste and Resource Offtake	3 weekly refuse collections and green waste collection charges with weekly AHP & Green collections. Savings split between offtake expenditure and collection income in collection budget.	200,000
ENV	Michael Roberts	ENV-P	Cemeteries	Increase in fees and charges associated with cemeteries to more align with those set by Bridgend CBC.	24,000
ENV	Ceri Morris	ENV-Q	Pest Control	Delivered through increased income target. Potential to achieve without increasing fees.	9,000
ENV	Ceri Morris	ENV-R	Pollution Control (Including Giants Grave Land Fill)	Delivered through recharging of officer time where appropriate and reduction of the materials budget for Giants Grave	11,000
ENV	Ceri Morris	ENV-S	Development Management	Trimming of the following budget lines: [1] statutory advertising (£2,869); [2] other advertising (£3,162); and [3] professional fees (£10,000)	16,031
ENV	Ceri Morris	ENV-T	Policy	Trimming of professional fees budget line. Will result in reduced ability to commission external consultants to assist with the LDP work programme.	24,547
ENV	Ceri Morris	ENV-U	Countryside	Delivered through [1] increase in income generation from fees for Statutory Orders (£2,500); [2] reduction in advertising budget (£5,000); and [3] reduction in expenditure of 'Other Services' budget line (£6,909)	14,409
ENV	Ceri Morris	ENV-V	Biodiversity, Countryside & Wildlife Projects	Delivered through [1] reduction in expenditure (£8,000); and [2] increased income generation target over and above existing target (£6,695)	14,695

Appendix 2 – Savings and income generation proposals

Directorate	Chief Officer	Reference	Service Area	Description of how budget reduction will be delivered	£
ENV	Ceri Morris	ENV-W	Building Control/Regulations	Delivered through a combination of [1] the removal of Dangerous Structures out of hours cover (£11,000); [2] reduction of the 'Works in Default' budget line (£3,000); and [3] reduction in car allowance budget line (£1,000).	14,970
ENV	Ceri Morris	ENV-X	Trading Standards	Delivered through [1] deletion of a Career Grade opportunity currently built into the structure (i.e. Enforcement Officer to Trading Standards Officer) (£11,000); and [2] reduction of the professional fees budget used for Barristers/Court Proceedings (£8,884).	19,884
ENV	Ceri Morris	ENV-Y	General Environmental Health	Deletion of a post either within the 'Housing Enforcement Team' or the 'Public Health and Safety Team'.	43,000
ENV	Ceri Morris	ENV-Z	Food & Health Protection	Deletion of vacant part-time EHO Post (GR9).	29,000
ENV	Simon Brennan	ENV-AA	Civic buildings	Increased income from the lease of floorspace within the Quays and possible changes to the Concierge/ facilities site officer roles.	150,000
ENV	Simon Brennan	ENV-AB	Former Metal Box building	Changes to the management of the facility.	135,000
S&CS	Chris Owen	S&CS-A	Digital Services	Service remodelling across Digital Services	264,055
S&CS	Chris Owen	S&CS-B	Digital Services	Mobile phone contract changes	20,000
S&CS	Chris Owen	S&CS-C	Digital Services	Provide Barrier Access and AI Monitoring for Service Response Centre (SRC)	10,000

## Appendix 2 – Savings and income generation proposals

Directorate	Chief Officer	Reference	Service Area	Description of how budget reduction will be delivered	£
S&CS	Sheenagh Rees	S&CS-D	Occupational Health & Safety & Well-being Team	Service Remodelling of the Health & Safety Team	18,692
S&CS	Sheenagh Rees	S&CS-E	Occupational Health & Safety & Well-being Team	Service remodelling of Occupational Health Team	18,840
S&CS	Sheenagh Rees	S&CS-F	Emergency Planning Team	Increase income	3,046
S&CS	Sheenagh Rees	S&CS-G	Emergency Planning Team	Temporary change in team structure	11,500
S&CS	Sheenagh Rees	S&CS-H	Learning, Training & Development Team	Service remodelling of the Corporate Training Team	20,000
S&CS	Sheenagh Rees	S&CS-I	Policy & Executive Support	Delete vacant hours @ Grade 8	10,000
S&CS	Sheenagh Rees	S&CS-J	Human Resources	Service Remodelling of the HR Team	65,024
S&CS	Sheenagh Rees	S&CS-K	Human Resources	Reduce trade union facilities budget	12,500
S&CS	Craig Griffiths	S&CS-L	Legal and Democratic Services	Service Remodelling - legal services	64,848
S&CS	Craig Griffiths	S&CS-M	Legal and Democratic Services	Service Remodelling - business administration	39,050
S&CS	Craig Griffiths	S&CS-N	Legal and Democratic Services	Income Generation - charges to specific projects	21,000
S&CS	Craig Griffiths	S&CS-O	Legal and Democratic Services	Reprofiling of funding from Corporate Joint Committee	20,000
S&CS	Craig Griffiths	S&CS-P	Legal and Democratic Services	Service remodelling of mailroom services	13,000

Appendix 2 – Savings and income generation proposals

Directorate	Chief Officer	Reference	Service Area	Description of how budget reduction will be delivered	£
S&CS	Craig Griffiths	S&CS-Q	Legal and Democratic Services	Reduction in legal services online resources	10,000
S&CS	Noelwyn Daniel	S&CS-R	Strategy and Corporate Services	Service re-modelling across Directorate through voluntary redundancy	110,202
Finance	Huw Jones	FINC-A	Finance Division	Contract saving from re-tendered insurance contracts	158,000
Finance	Huw Jones	FINC-B	Finance Division	Service remodelling of financial services	73,400
SSH&CS	Chele Zandra Howard	SSH&CS-A	Housing & Communities	Reducing the costs of providing homelessness services through service redesign and preventing people from requiring temporary accommodation	112,000
SSH&CS	Keri Warren	SSH&CS-B	Children & Young People Services	Natural reduction in the number of non-looked after children (LAC) allowances (Residence Orders, Special Guardianship Order (SGO) & Adoption Allowances)	232,000
SSH&CS	Keri Warren	SSH&CS-C	Children & Young People Services	Reduction in staffing costs including the restructure of the Practice Support Worker (PSW) service	386,000
SSH&CS	Keri Warren	SSH&CS-D	Children & Young People Services	Fostering Service - Reduction in budget for in-house allowances, external agency costs & Carer travel	630,000
SSH&CS	Keri Warren	SSH&CS-E	Children & Young People Services	Income Generation - provide fostering placements to neighbouring LA's	52,000
SSH&CS	Keri Warren	SSH&CS-F	Children & Young People Services	Health visitor post	21,000

## Appendix 2 – Savings and income generation proposals

Directorate	Chief Officer	Reference	Service Area	Description of how budget reduction will be delivered	£
SSH&CS	Keri Warren	SSH&CS-G	Children & Young People Services	Reduce Section 17 (S17) discretionary spend budget	50,000
SSH&CS	Keri Warren	SSH&CS-H	Children & Young People Services	Reduction in the number of Looked After Children Taxi Routes	21,200
SSH&CS	Angela Thomas	SSH&CS-I	Adult Services	Direct Payments (DP) whole system review (inc Payroll and Suitable Person service).	250,000
SSH&CS	Angela Thomas	SSH&CS-J	Adult Services	Additional capacity for longer term placements at Trem y mor (TYM)	750,000
SSH&CS	Angela Thomas	SSH&CS-K	Adult Services	In source supported living transitions schemes for Learning Difficulties (LD) / Mental Health (MH)	1,000,000
SSH&CS	Angela Thomas	SSH&CS-L	Adult Services	Placement efficiencies	650,000
SSH&CS	Angela Thomas	SSH&CS-M	Adult Services	Review of Domiciliary Care calls, sit in services and wakeful/sleep-in support to develop alternative models	500,000
SSH&CS	Angela Thomas	SSH&CS-N	Adult Services	Implement alternative Day Service provision within supported living settings to reduce reliance on traditional models. Reduce number of days attended. Reduction in opening times.	250,000
SSH&CS	Angela Thomas	SSH&CS-O	Adult Services	Implement Trem y Glyn Reablement Capacity	260,000
SSH&CS	Angela Thomas	SSH&CS-P	Adult Services	Restructure of adult services teams/deletion of 6 full time equivalents (FTE).	250,000

Appendix 2 – Savings and income generation proposals

Directorate	Chief Officer	Reference	Service Area	Description of how budget reduction will be delivered	£
Other	Huw Jones	OTH1	Council tax premiums	Introduction of council tax premium for second homes and long term empty properties.	1,500,000
<b>Total</b>					<b>11,791,143</b>





## NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

### CABINET

2 OCTOBER 2024

### REPORT OF THE DIRECTOR OF FINANCE – HUW JONES

#### Matter for Decision

#### Wards Affected Rhos

#### Report Title – Community Councils Minor Projects Scheme – Application from Cilybebyll Community Council

#### Purpose of Report

1. To seek Members' approval to provide a grant to Cilybebyll Community Council under the Council's Community Councils Minor Projects Scheme.

#### Background

2. Neath Port Talbot Council has approved a Community Council Minor Projects Grants Scheme in order to assist Community Councils in undertaking minor capital projects. Approved grants are required to be claimed within two years of approval.
3. The Council has received an application for grant aid under the above mentioned scheme from Cilybebyll Community Council.

This application is for grant assistance towards the cost of works in the amount of £91,266.00.

The grant would help towards the funding sought to realize the Community Council's ambition of developing a Multi-Use Games Area (MUGA) in Rhos Park. This would augment earlier investment in the equipped play area and the football field that is used by Rhos FC. A defunct BMX track has been a source of concern for the Community Council for some years and this proposal will not only remedy that situation by re-purposing the site of the former BMX but also give the village a new sports amenity. The origins of the project can be traced back to consultation carried out some four years ago. Many options have been explored and exhausted and we are confident that the MUGA will be of greatest appeal to the widest of audiences.

The MUGA Specification will include a playing surface footprint (12 x21m), of porous tarmac marked out for netball, basketball and football enclosed with a 3m perimeter fence with recessed goal mouths, hoops and a chicane. Link paths, reinstatement, curb edging, and litter bins, benches and a bike rack are included in our project proposal.

Our vision is to create an informal space for recreational sport in a secure, safe environment which is within easy walking distance of a captive audience.

This project has been under consideration for four years. We find that as years go by and we wait for a general consensus of opinion the value of the grant aid available to us depreciates.

It is now time to act as we have seen 15% increases in the cost of stone, steel, rubber, labour and raw materials since the pandemic. Further prevarication will make this project proposal less deliverable, being beyond the current funding arrangements that are currently within our grasp.

### **How will the balance of the project costs be financed?**

The £9,000 requested from the Community Minor Projects grant would be used as match funding towards a secured Section 106 community contribution for 'play, open space, pitch and non-pitch provision' valued at £71,266. The remaining £11,000 will be a contribution from the Cilybebyll Community Council Reserves (agreed at Community Council meeting 03.09.24).

## **What are the revenue implications?**

Annual inspection, ongoing maintenance and insurance will fall to the Community Council. The upkeep of the MUGA will be in accord with the current arrangements for inspecting, maintaining and insuring the equipped play area in Rhos Park.

There are no moving parts to the MUGA and all components are heavy gauge (equivalent to 356 prison mesh). We anticipate minimum maintenance costs. There will be a need for sweeping autumn leaves, control of moss and algae and emptying of litter bins which our on-site Community Centre Caretaker will attend to.

## **Has your organization approached other funding bodies e.g. National Lottery?**

No, not for this project as the core funding is available from Section 106 and this 'community contribution' must be invested within Rhos Park and committed within certain timescales which are due to lapse. With the Community Minor Projects grant the total funding package will exactly mirror the total project cost of £91,266.

## **4. How will this project contribute to the Council's four well-being objectives as set out in the 2022-2027 Corporate Plan?**

The project aligns closely to three of the four NPTCBC Corporate Plan 2022-2027 wellbeing objectives:-

### **1. All children get the best start in life**

The most recent Census data indicates that there are 414 individuals between the age of 0-17 living in the Ward of Rhos, and a further 552 in the neighbouring Ward of Alltwen. This new facility would be on their doorstep, and will create positive opportunities for play, exercise, sport and socialization for children of all ages, as well as their parents, grandparents and carers. This project proposal will foster community cohesion, engagement and positive leisure time pursuits across a wide range of age groups, being of maximum appeal to children and young people.

## **2. Our local environment, culture and heritage can be enjoyed by future generations**

As a Community Council we feel it is our duty to revitalize this area by providing a new amenity which adds considerably to the provision currently on offer at Rhos Park, one which is better aligned to what the community needs. The equipment to be installed has been chosen based on its ability to stand the test of time (it comes with generous warranties which cover the steel components, groundworks and court furniture). All components will be of robust construction, ensuring that the facility will serve the community for many years to come. The Play environment at Rhos Park will be multi-faceted with the arrival of the MUGA. It will give generations of children and young people years of service and enjoyment, making Rhos a better place to live, work, play, enjoy and relax.

## **3. All communities are thriving and sustainable**

The new facility would provide opportunities for our residents to thrive; enjoying a better quality of life, making the most of the outdoors, and ensuring the area is more attractive and vibrant. The new facility will foster neighbourhood renewal, community pride in place and community spirit. It will provide for the young families that have moved into the new 'Permissions' development. The new MUGA would enhance the activities currently offered by Rhos FC, and help to make the Club more financially sustainable.

## **Proposal and Financial Impact**

5. The application from Cilybebyll Community Council Council complies with the conditions of grant and is entitled to grant support at 45% up to a maximum of £9,000 in accordance with the Minor Projects Grants Scheme and payment be made on receipt of paid invoices together with a copy bank statement.

## **Integrated Impact Assessment**

6. There are no impacts in respect of the obligations to the Council under the Equality Act 2010, the Welsh Language Standards (No 1) Regulations 2015, the Environment (Wales) Act 2016 and support

via this grant is a positive impact in respect of the Wellbeing and Future Generations (Wales) Act 2015.

### **Valleys Communities Impacts**

7. Applications for grant are available to Community Councils across the county borough.

### **Workforce Impacts**

8. There are no workforce impacts.

### **Legal Impacts**

9. Grants are provided in line with the approved scheme criteria.

### **Risk Management Impacts**

10. All grant applications are considered on their own merit and in line with the approved scheme criteria.

### **Consultation**

11. There is no requirement under the Constitution for external consultation on this item.

### **Recommendation**

12. It is recommended that Members approve a grant of 45% of actual costs up to a maximum of £9,000 to Cilybebyll Community Council.

### **Reason for Proposed Decision**

13. The decision is in compliance with the approved policy and to enable community improvements.

### **Implementation of Decision**

14. The decision is proposed for implementation after the 3 day call-in period.

## **List of Background Papers**

15. Application from Cilybebyll Community Council.

## **Officer Contact**

16. Mr. H. Jones. – Director of Finance  
Tel. 01639 763575 - email: [h.jones@neath-porttalbot.gov.uk](mailto:h.jones@neath-porttalbot.gov.uk)

## NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

### CABINET

2 OCTOBER 2024

### REPORT OF THE DIRECTOR OF FINANCE

#### **Matter for Decision**

**Wards Affected – Margam and Taibach**

#### **NEATH PORT TALBOT WELSH CHURCH ACT TRUST FUND**

##### **1. Purpose of Report**

To seek Member approval in relation to grant application received at Appendix 1 attached.

##### **2. Background and Financial Impact**

The Council as trustee is responsible for managing the Welsh Church Act Trust Fund. Grants are received by application from churches and chapels, charitable organisations and individuals as set out in the criteria below. The Welsh Church Fund has funds available to it in its own right to distribute as part of an approved grant scheme. All claimants must claim their grant within two years of committee approval.

#### **Review of Award Criteria**

#### **Welsh Church Acts Fund Guidelines for Grant Applications**

- a) Each application will be considered on its merits.
- b) Grants will only be awarded to charities and voluntary bodies which are based in, or active in, or provide significant benefits to some or all of the residents of the Neath Port Talbot County Borough area.
- c) Grants will only be awarded to individuals in exceptional circumstances.
- d) Grants will not normally exceed £1,000 and in exceptional circumstances £4,000 per applicant and successful applicants

will not normally be reconsidered for a further grant within 3 years of the date of approval of the last grant.

- e) Grants will have a time limit for the take up of said grant of two years from the date of approval.
- f) Grants will not normally be awarded where the service could be dealt with out of the annual budget of the Council's service Committees activities or by other public bodies.
- g) Grants will not normally be awarded where they would commit the fund to regular annual payments nor will recurring annual expenses be supported.
- h) Grants will only be made out of the income of the fund, preserving the Fund's capital assets.
- i) Priority will be given to applications which are of significant benefit to the Neath Port Talbot County Borough area.
- j) Grant aid will not normally cover the full cost of a project/proposal and normally will be approved at 25% of actual costs incurred up to the maximum as outlined in condition (d) above. The grant of £4,000 will only be approved where expenditure exceeds £50,000.
- k) Organisations assessed as being able to meet the cost (e.g. by size or nature) are unlikely to receive any grant aid.
- l) Grants towards work of a structural nature will only be considered where
  - there is evidence that a professional assessment has been made of the works
  - the applicant organisation can demonstrate that there is no other impediment to work proceeding at an early date (e.g. planning permission).
- m) In the case of Churches and Chapels grants will only be approved for the repair of the fabric of buildings which are more than 50 years old and of the highest architectural and historic interest. Church halls, however, where available and used significantly by the public for non-religious purposes will not be subject to these criteria.



- n) No retrospective applications are considered.
- o) The Panel will take into account the Church membership and the normal size of the congregation.
- p) In the case of students undertaking further Education courses, contributions towards the costs of individual instruments or pieces of equipment etc. will be made as follows - 50% of all costs over a threshold of £2,000 up to a maximum grant of £1,000.

### **3. Integrated Impact Assessment**

There is no requirement to undertake an impact assessment.

### **4. Valleys Communities Impacts**

Applications for grant are available to churches and chapels, individuals and charitable organisations across the county borough.

### **5. Workforce Impacts**

There are no workforce impacts.

### **6. Legal Impacts**

Grants are provided in line with the approved scheme criteria.

### **7. Risk Management Impacts**

All grant applications are considered on their own merit and in line with the approved scheme criteria.

### **8. Consultation**

There is no requirement for external consultation on this item.

### **9. Recommendation**

It is recommended that Members approve the application set out in the Appendix to this report.

**10. Reason for Proposed Decision**

To decide on the amount of financial support in respect of the grant application received.

**11. Implementation of Decision**

The decision is proposed for implementation after the three day call in period

**12. Appendices**

Appendix – schedule of grant application.

**13. List of Background Papers**

Grant Application.

**14. Officer Contact**

Mr Huw Jones – Director of Finance  
Tel. No: 01639 763575  
email: [h.jones@npt.gov.uk](mailto:h.jones@npt.gov.uk)

**Appendix**

<b>Applicant</b>	<b>Purpose</b>	<b>Amount Request/Cost of "Project"</b>	<b>Previous Support</b>	<b>Comments</b>
Taibach Wesley Methodist Chapel	Grant assistance towards costs of works to ensure water ingress does not continue to adversely impact the historic structure.	The cost of this project is estimated at £8,700. A professional assessment has been made of the works and they have received a current quote of £8,700, £6,300 has been paid to date and there is an outstanding balance of £2,400. Taibach Wesley Methodist Chapel is over 130 years old and is currently the only Chapel where worship still takes place in the area. The Chapel not only holds Bible Study, religious worship a Friendship Group and also acts as a community space housing groups such as Eastern Primary School who hold courses through the Adult Learning and Flying Start initiative. The Cymric Choir rehearse there twice weekly and Hems and Hobbies a local craft group meet once a week . The Chapel hall is also used for the purpose of voting.	N/A	A grant of £1,000 be approved





Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## **NEATH PORT TALBOT COUNTY BOROUGH COUNCIL**

### **CABINET**

**2 OCTOBER 2024**

### **REPORT OF THE DIRECTOR OF FINANCE – HUW JONES**

#### **Matter for Decision**

#### **Wards Affected – Cymer and Glyncorrwg**

#### **Report Title – Miscellaneous Grant Fund Application**

#### **Purpose of the Report:**

1. To seek Member approval in relation to grant application received at Appendix 1 attached.

#### **Background and Financial Impacts**

2. The Council has a Miscellaneous Grants Scheme to support individual applications for grants in line with the criteria set out below:-

#### **Existing Policy Statement**

- a) Each application will be considered on its merits.
- b) The Committee will only approve applications for financial assistance from voluntary or charitable organisations which are manifestly committed to voluntary endeavours of a local

nature. This will not preclude the consideration of applications where the disposal of funds is outside the area but still provides significant benefits for the people from the Neath Port Talbot area.

- c) No applications will be considered from religious bodies except relating to church halls and other premises where there is significant community use of the property for non-religious activities.
- d) No applications will be considered from other public funded bodies such as community councils, hospital trusts, etc. or where the benefit may be in lieu of their contributions such as appeals for hospital equipment.
- e) Applications from individuals may be considered where both the person and the community derive a benefit.
- f) No grants will be made to any individual or organisation whose prime purpose is to distribute their funds to other charitable bodies.

### **Integrated Impact Assessment**

- 3. There are no impacts in respect of the obligations to the Council under the Equality Act 2010, the Welsh Language Standards (No 1) Regulations 2015, the Environment (Wales) Act 2016 and support via this grant provides generally a positive impact in respect of the Wellbeing and Future Generations (Wales) Act 2015.

### **Valleys Communities Impacts**

- 4. Applications for grant are available to voluntary and charitable organisations across the county borough.

### **Workforce Impacts**

5. There are no workforce impacts.

### **Legal Impacts**

6. Grants are provided in line with the approved scheme criteria.

### **Risk Management Impacts**

7. All grant applications are considered on their own merit and in line with the approved scheme criteria.

### **Consultation**

8. There is no requirement for external consultation on this item.

### **Recommendation**

9. It is recommended that Members approve the application set out in Appendix 1 to this report.

### **Reason for Proposed Decision**

10. To decide on the amount of financial support in respect of the grant application received.

### **Implementation of Decision**

11. The decision is proposed for implementation after the three day call in period

## **Appendices**

12. Appendix 1 – Schedule of grant application

## **List of Background Papers**

13. Grant Application

## **Officer Contact**

Mr. Huw Jones – Director of Finance

Email: [h.jones@npt.gov.uk](mailto:h.jones@npt.gov.uk)



## SCHEDULE OF GRANT APPLICATIONS

Applicant	Purpose	Amount Request/Cost of "Project"	Previous Support	Comments
South Wales Miners' Museum	The Trustees of South Wales Miners' Museum have applied for grant assistance in relation to the lease of land and premises comprising South Wales Miners' Museum	Grant towards the cost of rent of £625 pa which is increasing from £550 pa	Cabinet (Finance) Sub Committee 05/12/18 approved a grant of £500.00 p.a	Proposed that a grant of £594 per annum be offered which is the equivalent of c95% of the new rent.

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## NEATH PORT TALBOT COUNCIL

### NEATH PORT TALBOT CABINET BOARD

2<sup>nd</sup> October 2024

#### Report of the Head of Housing and Communities – Chelé Zandra Howard

##### **Matter for Decsion**

**Wards Affected:** All Wards

##### **Disabled Facilities Grant Options Appraisal**

##### **Purpose of the Report**

To present the options appraisal report to members following the Update report of March 2024, in respect of the Disabled Facility Grant (“DFG”) service.

##### **Executive Summary**

Post pandemic, there have been a number of changes that has directly impacted on both demand for DFGs and the utilisation of DFGs for those with more complex adaptation needs.

One of the most significant changes impacting on the utilisation of DFGs is that the cost of materials and labour has increased considerably. In some cases, the cost of undertaking adaptation works far exceeds the statutory maximum DFG limit of £36k, resulting in applications being cancelled and the applicant not receiving essential adaptations.

Alongside rising costs, the removal of the means test for small and medium sized works has resulted in a notable rise in people becoming eligible for a DFG.

The available budget for DFGs is now being committed earlier in the year and long waiting lists have been building. This is anticipated to continue based on projected demand and costs.

## **Background**

The capital budget for DFGs, as set by the Capital Programme Steering Group (“CPSG”), is £3m per annum. It has been at this level for over 10 years, £1.4m was carried over from the COVID-19 period and has now been fully spent.

Neath Port Talbot County Borough Council (“the Council”) also receives an ENABLE award of £280k from Welsh Government (WG), £90k of this is a “top up” for agreeing to remove the means test for small and medium sized grants.

The DFG budget is fully spent every year and demand far exceeds the amount of funding available, with the budget becoming committed by the end of September/October. Once the budget is committed for the year, a waiting list for the following financial year then begins to build.

Demand for adaptations funded via a DFG is rising, a notable amount of additional demand was created due to the removal of the means test for small and medium sized adaptations, which was agreed by the Council following a request from WG.

During the 2021/22 financial year, 146 applications were received for small and medium sized jobs where the applicant was not on a passporting benefit and therefore needed a means test before proceeding any further. Of these, 19 applicants cancelled before the means test was undertaken and an additional 113 applicants cancelled

after the means test, with only 14 applicants continuing to the on-site stage.

The below shows the demand for DFGs in the last three financial years:

*For financial year April 22 – March 23*

- 280 jobs were completed and certified on site, of these 26 were extensions.
- 254 jobs were small and medium sized works.
- Out of the 254 jobs completed, 89 would have had a means test pre 1<sup>st</sup> August 2022 and likely to have cancelled, this equated to a value of £667,500.

*For Financial year April 2023- March 2024*

- 293 jobs were completed and certified, of these 25 were extensions.
- 270 jobs were small and minor works.
- Out of the 270 jobs completed, 165 would have had means tests pre 1<sup>st</sup> august 2022 and likely to have cancelled, this equated to a value of £1,237,500.

*Start of Financial Year 2024/25*

- At the start of FY 24/25 there were 390 applicants on the waiting list.
- Previous years the average number on the waiting list at the start of the year was around 70 applicants.

This years waiting list compromised of the combination of works as stated below:

- 225 Shower conversions x average cost £7500 = £1,687,500
- 3 Extensions x average costs x £36000 = £108,000
- 162 specialist equipment jobs x average costs x £2000 = £324,000
- Total value of waiting list - £2,119,500

### The works

Shower conversions - Are generally where the bath is taken out and the bathroom reconfigured and a level access shower tray, shower doors and a thermostatically controlled shower are installed, very often a Stairlifts would also be installed at the same time.

Extensions – DFG extensions can vary from a ground floor WC or shower room, to a single or double bedroom ground floor extension and the largest variation is a double bedroom with attached shower room.

Specialist equipment – These are primarily Stairlifts, but can also be vertical lifts, ceiling track hoist, and wash dry type toilets.

### Applications live in the system as at 1<sup>st</sup> April:

- 128 shower conversions x 7500 = £960,000
- 22 extensions x £36,000 = £792,000
- 27 specialist equipment x £2000 = £54,000

The below table highlights the cost pressure that demand has on the available budget, resulting in the Council already being in a position of having a waiting list for 25/26:

Total value of works live in the system	£1,806,000
Total value of works in the waiting list	£2,119,500

Total combined value	£3,925,500
Available budget	£2,680,000
<b>Committed budget of FY 25/26 at 1<sup>st</sup> April 2024</b>	<b>£1,245,50</b>

## **Demand**

Over the past few years, the waiting list going into a new financial year averages around 70 – 80 applications, as stated above the waiting list at the start of FY 24/25 was 390 applications and £1,245,50 of the 25/26 budget is already committed.

This increased demand is a combination of more people needing adaptations and the removal of the means test for small and medium sized works.

The waiting list at the start of the financial year had 3 new referrals for extensions, this is unusually low, the service would normally have between 20 and 40 extensions in the process at any time.

This low number is due to the limited budget and maximum grant amount, extensions are now in most cases costing more than the grant limit of £36,000. When an applicant contacts the Council, they are made aware of this and also made aware they will be required to pay any over and above the £36k, many are dropping out of the process at this stage. When the Occupational Therapist (OT) visits the applicant they remind them of the financial limits, again some drop out at this stage.

Due to the financial restrictions, the OT has a discussion with the applicant to come up with a compromise and an alternative to an extension, by recommending a smaller adaptation. This isn't ideal as its not fully addressing the required need for the client, this could also result in additional care needs being put in place and possibly an additional grant in the future.

## **Cost of Works**

The cost of building materials continues to rise, albeit some prices have now plateaued, this has had a significant impact on the type of works that can be fully covered by a DFG, especially extensions, given that the maximum grant that can be awarded is £36k.

A shower extension 5 years ago cost around £15k, but is now in the region of £30k for exactly the same size and specification, a bedroom extension 5 years ago would cost around £35k but is now around £50k and a bedroom/shower room extension can cost £60k+. Shower conversions, Stairlifts and other specialist equipment have also risen in cost, all resulting in less work.

If a DFG application is not pursued or cancelled due to the cost of works, it leaves the applicant in a position of still needing these adaptations and this could have a number of different consequences, such as hospital admission from falls, delayed hospital discharge and care services refusing to continue to deliver care due to unsafe areas.

Currently the Service has no funding to pay the costs of adaptations in excess of the £36k DFG limit. This means that the applicant/landlord needs to fund the excess amount, which could be up to £30k for the larger jobs.

Due to increasing demands for adaptations and the rising costs of materials, as indicated above, the DFG budget will be committed earlier and earlier, which is going to result in people waiting years for the adaptations they need.

This brings its own consequences, as the longer someone waits the more chance their condition will deteriorate resulting in them requiring a larger adaptation from when they were first assessed. They may also need additional care services while on the waiting list or be admitted to hospital/care home bringing additional costs to the authority and health service.



## **Summary of Issues**

### Rising demand

Increased demand for adaptations plus removal of means test has resulted in many more people qualifying for a grant which has increased demand and length of waiting list.

### Cost of works increasing and £36,000 limit.

Cost of works has increased significantly post COVID-19, which has had a significant effect on costs of extensions resulting in most extensions costing over £36,000.

## **Proposals**

### Mitigation of rising demand - Reintroduce the means test for small and medium sized DFG's:

- It is proposed that the Council reintroduce the means testing for small and medium sized grants, this will significantly reduce the waiting list and time.
- The removal of the means test arose from a request by WG and is not currently a legal requirement. As such, the Council has a legal ability to reintroduce the means test. It should be noted that a reintroduction may bring about opposition from WG who were keen for Local Authorities to remove the test.
- Officers are aware of at least two other Local Authorities that are also considering a reintroduction of the means test due to the increased demand they are seeing.
- If an applicant has moved from the waiting list into the formal application process then they can proceed without a means test. Those on the waiting list that haven't progressed to the formal stage will be notified that a means test will be carried out at application stage.

- An advantage of reintroducing the means test is that the funding is used where people need it the most, as those that have the means to carry out the works would have to fund it themselves.
- The waiting list system is in date order, resulting in people who have the means to do the works themselves having the work done before those that do not have the financial ability to carry out the work themselves.
- If agreed to reintroduce the means test, the service policy tools can be updated to reflect this and be submitted to cabinet for approval and a date set to implement the change.
- This proposal is likely to reduce the waiting list by approx. 150 applications.

Mitigation for cost of works - Implement an additional discretionary budget to pay for costs over and above the £36k:

- It is proposed to introduce a maximum £10,000 discretionary budget for works over £36,000.
- The average additional cost is around £10,000 per job.
- It is proposed to fund a discretionary budget using the DFG repayments received when the 10 year grant conditions are broken, currently the repayments are not recycled back into DFGs.
- Below are the total amount of DFG repayments since 2020:
  - 23/24 – 20 payments- £107,421.27
  - 22/23 – 34 payments - £150,851.46
  - 21/22 – 44 payments - £187,541.24
  - 20/21 - 41 Payments - £162,173.47

- To ensure the money is used in the most effective way it is proposed that it carries a lifetime charge that will be put on the property, ensuring that the full amount of the discretionary top up will be repaid when the house is sold. These repayments can then be recycled back into the discretionary budget.
- As RSL's do not sell their properties, a lifetime charge would not be possible for adaptations to social housing, therefore top up discretionary funding would only be available for private properties and private landlords, with RSL's being responsible to fully fund any amount over £36k.
- Cost of the works will be as accurately costed as possible prior to works starting on site, the client will be made aware of these costs and conditions and notified that they will be expected to fund all costs over the £10,000 discretionary budget.
- This will allow for small extensions to continue, offering the much needed facilities that the applicants require.

### **Other Options Considered but not Recommended**

#### Priority lists – Implement a waiting list based on an applicant's priority of need:

- This would result in a waiting list based on the OT's assessment of priority. This type of system is likely to have little impact, as the majority of applicants have equal levels of need.

#### Extension options – Policy to not fund extensions:

- A number of Welsh Local Authorities have put in place a policy to no longer approve extensions for a DFG.
- Implementing such a policy would leave vulnerable applicants without access to a needed adaptation.

- Due to the cost of works, the demand for extensions will naturally be reduced and only a few small extensions will progress to on site. As such this proposal is unlikely to have a notable impact.
- OTs already look for alternatives to extensions and so only those that absolutely require an extension are put forward for one.

#### Using DFG budget to fund top up.

- An option could be to consider reducing the amount of funding set aside for DFGs and re-align this money for DFG 'top ups' based on the above principles.
- This would make the situation worse by reducing the available budget.
- Given that the repayment fund has not been allocated against an area of spend, utilising this funding rather than the money already allocated to DFG will have a more noticeable positive impact.

### **Summary of Recommended Proposals**

As stated above, demand and waiting lists continue to substantially grow due to more people needing adaptations post COVID-19, plus the removal of the means test meaning more people now qualify for a grant. This additional demand is far higher than the available budget and a large proportion of the waiting list now consists of people who have the means to carry out the works themselves.

In order to mitigate this additional demand and use the grant funding to prioritise those most in need, it is proposed to reintroduce the means test for small and medium sized grants.

Due to the rising cost of works the £36,000 grant limit is no longer enough to fully fund extensions, although there has been less demand for extensions due to the financial limit, there are still applicants who

need a ground floor extension, in order to support this and to make them happen, it is proposed to introduce a £10,000 discretionary budget funded by the DFG repayments.

This discretionary top up will also come with a lifetime charge on the property so the authority will always have this money back to recycle into further projects.

### **Financial Impacts**

The total amount of funding available for DFGs in 2024/25 is £3m, this has been a standstill position for a number of years.

An additional sum of £100,000 per annum is requested for the discretionary top up fund for assessed works that cost over £36,000. This funding will come from the DFG monies returned to the Council when the 10 year grant conditions are broken.

### **Integrated Impact Assessment**

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. The first stage impact assessment has indicated that a more in-depth assessment was required.

An overview of the Integrated Impact Assessment has been included below in summary form only and it is essential that Members read the Integrated Impact Assessment, which is attached to the report at Appendix 1, for the purposes of the meeting.

### **Proposal 1 – Justification**

On balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will

be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.

### Proposal 2 – Positive Impact

Will have a positive impact on those people with a disability that require more costly works to remain living safely and independently in their homes.

### **Valleys Communities Impacts**

The implications of demand for DFGs and the rising costs of works will be seen across the Neath Port Talbot area and not specific to Valley communities.

### **Workforce Impacts**

No impacts.

### **Legal Impacts**

There is a statutory requirement for the Council to have a DFG policy, however the content and scope of this policy gives a degree of discretion to Local Authorities. Given that the previous decision to remove the means test did not arise from a statutory requirement, there is no legal basis that requires the Council to maintain the current policy and the Council is therefore able to update this policy and reinstate the means test.

Given that the decision to remove the means test was influenced by a request from WG, reinstatement may lead to opposition from WG.

However, as noted above there is no legal basis to prevent the Council from implementing a means test.

### **Risk Management Impacts**

No further impacts.

### **Crime and Disorder Impacts**

No impacts.

### **Consultation**

The proposal to reinstate the means test will require public consultation, as such it is proposed that Officers undertake a 6 week consultation in respect of this.

### **Scrutiny Observations**

This item was considered at the Social Services, Housing and Community Safety Scrutiny Committee on the 19<sup>th</sup> September 2024 and the committee was supportive of the recommendations.

### **Recommendations**

It is recommended that Members approve:

- Officers to undertake further work in respect of the recommendation to reinstate the means test, including undertaking a public consultation, with a final Officer recommendation and proposed policy tools brought back to Cabinet for agreement at a later date;
- The establishment of a discretionary budget that will provide an additional £10k grant for essential works that cost in excess of £36k.

## **Reasons for Proposed Decision**

To help mitigate the impact of increasing demand for DFGs and that the available budget is utilised in a way that ensures those who are most in need are able to access adaptations in a more timely way.

## **Implementation of Decision**

The decision is proposed for implementation after the three day call in period.

## **Appendices**

Appendix 1: Integrated Impact Assessment

## **List of Background Papers**

Background Paper 1: Disabled Facilities Grant Update Report  
(Agenda Item 13):

<https://democracy.npt.gov.uk/ieListDocuments.aspx?CIId=494&MIId=11046>

## **Officer Contact**

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Robert Davies, Principal Officer Housing Renewal and Adaptation  
Service. email [r.i.davies@npt.gov.uk](mailto:r.i.davies@npt.gov.uk)



## Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

### Version Control

Version	Author	Job title	Date
Version 1	Chelé Zandra Howard	Head of Housing & Communities	19/08/24
	Rob Davies	PO Housing Renewal and Adaptation Service	

### 1. Details of the initiative

	<b>Title of the Initiative: Disabled Facilities Grant (DFG) Options Appraisal</b>
<b>1a</b>	<b>Service Area:</b> Housing Renewal and Adaptation Service
<b>1b</b>	<b>Directorate:</b> Social Services, Health & Housing
<b>1c</b>	<p><b>Summary of the initiative:</b> To introduce measures to help reduce waiting times for DFGs and to fund essentials works over the £36k DFG limit:</p> <p>Proposal 1 – To reintroduce the means test for small and medium DFGs</p> <p>Proposal 2 – To introduce a £10k ‘top-up’ grant for works that cost in excess of the current DFG limit of £36k.</p>
<b>1d</b>	<b>Is this a ‘strategic decision’?</b> Yes

<b>1e</b>	<p><b>Who will be directly affected by this initiative?</b></p> <p>These proposals would directly impact on those that are assessed as requiring adaptations to their home due to their disability and may also indirectly impact on unpaid carers who support those that require an adaptation to their home.</p>
<b>1f</b>	<p><b>When and how were people consulted?</b></p> <p>Proposal 1 - The proposal to reinstate a means test will require public consultation, as such it is proposed that Officers undertake a 6 week consultation before a final recommendation is made.</p> <p>Proposal 2 - The proposal to implement a £10k 'top-up' is based on data and feedback from people who have been assessed for a DFG, which shows that some people are unable to go forward with essential adaptations as they are unable to fund the excess costs of works.</p>
<b>1g</b>	<p><b>What were the outcomes of the consultation?</b></p> <p>Proposal 1 - TBC – The impact assessment will be updated following a consultation process.</p> <p>Proposal 2 – People with a disability are unable to obtain adaptations in line with their occupational therapy assessment due to the costs of some works being in excess of the DFG limit.</p>

## 2. Evidence

<p><b>What evidence was used in assessing the initiative?</b></p>
<p>Data in respect of DFG applications and waiting lists.</p>

### 3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	x			<p>A significant number of people who apply for a DFG will have a protected characteristic due to their age, as these adaptations often support those aged 60+ that have age related frailty/disability. Our Data shows that 84% of applicants are over the age of 60.</p> <p>Whilst there is no recorded data, it is reasonable to assume that many carers will also have a protected characteristic due to their age, as often those with age related frailty/disability will be supported by their partner/spouse.</p> <p><u>Proposal 1</u> – Reinstating the means test will mean that in the future, people who have the financial ability to fund small &amp; medium works will no longer be eligible to access a DFG and would be required to fund the works themselves.</p> <p>Whilst this results in some people no longer having access to the grant, these people will be assessed as having the financial means to fund the works without the need of a grant. This will then allow the available funding to be directed towards those that do not have the financial means to fund these works and will result in shorter waiting times for those people to receive the grant/works.</p> <p>As such, on balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.</p>

			<p>Those that have made a formal application for small and medium works before the proposal is implemented will not be impacted as their applications will be honoured.</p> <p><u>Proposal 2</u> – This should have a positive impact on those with this protected characteristic (both the person receiving a DFG and their unpaid carer), some essential adaptations cost in excess of the £36k limit and so this ‘top-up’ will enable more people to have access to more expensive works in line with their occupational therapy assessment.</p>
Disability	x		<p>The nature of a DFG means that all applicants will have a disability.</p> <p>Proposal 1 – Reinstating the means test will mean that in the future, people who have the financial ability to fund small &amp; medium works will no longer be eligible to access a DFG and would be required to fund the works themselves.</p> <p>Whilst this results in some people no longer having access to the grant, these people will be assessed as having the financial means to fund the works without the need of a grant. This will then allow the available funding to be directed towards those that do not have the financial means to fund these works and will result in shorter waiting times for those people to receive the grant/works.</p> <p>As such, on balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.</p>

			<p>Those that have made a formal application for small and medium works before the proposal is implemented will not be impacted as their applications will be honoured.</p> <p><u>Proposal 2</u> – This should have a positive impact on those with this protected characteristic (both the person receiving a DFG and their unpaid carer), some essential adaptations cost in excess of the £36k limit and so this ‘top-up’ will enable more people to have access to more expensive works in line with their occupational therapy assessment.</p>
Gender reassignment		x	<p>There is no data/information to suggest that those with this protected characteristic would be disproportionately impacted or subject to direct or indirect discrimination as a result of the proposals.</p> <p>This is because eligibility for a DFG is based on a person’s individual assessment of need by an Occupational Therapist in order to support those with a disability to live more independently at home and the proposal to reinstate the means test is focused on a person’s financial ability to fund the works they require.</p>
Marriage & civil partnership	x		<p>Whilst there is no recorded data, it is reasonable to assume that many informal carers will have this protected characteristic as many people provide informal care to their partner/spouse.</p> <p><u>Proposal 1</u> – Reinstating the means test will mean that in the future, people who have the financial ability to fund small &amp; medium works will no longer be eligible to access a DFG and would be required to fund the works themselves.</p> <p>Whilst this results in some people no longer having access to the grant, these people will be assessed as having the financial means to fund the works without the need of a grant. This will then allow the available funding to be directed towards those that do not have the financial means to fund these works and will result in shorter waiting times for those people to receive the grant/works.</p>

			<p>As such, on balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.</p> <p>Those that have made a formal application for small and medium works before the proposal is implemented will not be impacted as their applications will be honoured.</p> <p><u>Proposal 2</u> – This should have a positive impact on those with this protected characteristic (both the person receiving a DFG and their unpaid carer), some essential adaptations cost in excess of the £36k limit and so this ‘top-up’ will enable more people to have access to more expensive works in line with their occupational therapy assessment.</p>
Pregnancy and maternity		x	<p>There is no data/information to suggest that those with this protected characteristic would be disproportionately impacted or subject to direct or indirect discrimination as a result of the proposals.</p> <p>This is because eligibility for a DFG is based on a person’s individual assessment of need by an Occupational Therapist in order to support those with a disability to live more independently at home and the proposal to reinstate the means test is focused on a person’s financial ability to fund the works they require.</p>
Race		x	<p>There is no data/information to suggest that those with this protected characteristic would be disproportionately impacted or subject to direct or indirect discrimination as a result of the proposals.</p> <p>This is because eligibility for a DFG is based on a person’s individual assessment of need by an Occupational Therapist in order to support those with a disability to live</p>

			<p>more independently at home and the proposal to reinstate the means test is focused on a person's financial ability to fund the works they require.</p>
Religion or belief		x	<p>There is no data/information to suggest that those with this protected characteristic would be disproportionately impacted or subject to direct or indirect discrimination as a result of the proposals.</p> <p>This is because eligibility for a DFG is based on a person's individual assessment of need by an Occupational Therapist in order to support those with a disability to live more independently at home and the proposal to reinstate the means test is focused on a person's financial ability to fund the works they require.</p>
Sex		x	<p>43% of applicants are male and 57% are female, as such any changes will impact slightly more on females than males.</p> <p><u>Proposal 1</u> – Reinstating the means test will mean that in the future, people who have the financial ability to fund small &amp; medium works will no longer be eligible to access a DFG and would be required to fund the works themselves.</p> <p>Whilst this results in some people no longer having access to the grant, these people will be assessed as having the financial means to fund the works without the need of a grant. This will then allow the available funding to be directed towards those that do not have the financial means to fund these works and will result in shorter waiting times for those people to receive the grant/works.</p> <p>As such, on balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.</p>

			<p>Those that have made a formal application for small and medium works before the proposal is implemented will not be impacted as their applications will be honoured.</p> <p><u>Proposal 2</u> – This should have a positive impact on those with this protected characteristic (both the person receiving a DFG and their unpaid carer), some essential adaptations cost in excess of the £36k limit and so this ‘top-up’ will enable more people to have access to more expensive works in line with their occupational therapy assessment.</p>
Sexual orientation		x	<p>There is no data/information to suggest that those with this protected characteristic would be disproportionately impacted or subject to direct or indirect discrimination as a result of the proposals.</p> <p>This is because eligibility for a DFG is based on a person’s individual assessment of need by an Occupational Therapist in order to support those with a disability to live more independently at home and the proposal to reinstate the means test is focused on a person’s financial ability to fund the works they require.</p>

**What action will be taken to improve positive or mitigate negative impacts?**

No further actions required as the purpose of the proposals is to support those most in need of a DFG to access the works they require more promptly.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
------------------------------------	---	---	-----	-------------------------------



To eliminate discrimination, harassment and victimisation	x			<p>DFGs fund essential works for people with a disability, so that they are able to remain living in their homes. Enabling those most in need to quickly access a DFG will advance equality of opportunity between those who have and do not have a disability and those who can and those who cannot afford to undertake home adaptations.</p> <p>In addition, supporting people with a disability to remain members of their communities will support good community cohesion, thereby helping to eliminate discrimination/harassment/victimisation and help to foster good relations between different groups.</p>
To advance equality of opportunity between different groups	x			
To foster good relations between different groups	x			

**What action will be taken to improve positive or mitigate negative impacts?**

No further actions required as the purpose of the proposals is to support those most in need of a DFG to access the works they require more promptly.

**4. Socio Economic Duty**

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>Proposal 1 - Will have a positive socio-economic impact as it will enable people with a disability that are unable to afford essential adaptations to their homes to access a DFG grant more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.</p>

	Proposal 2 – Will have a positive socio-economic impact as it will enable those people that need more costly adaptations to be able to obtain the works required. This will enable more people to remain living in their own homes and also help to reduce the need for statutory support services.
Negative/Disadvantage	
Neutral	

<b>What action will be taken to reduce inequality of outcome</b>
No further actions required as the purpose of the proposals is to support those most in need of a DFG to access the works they require more promptly.

**5. Community Cohesion/Social Exclusion/Poverty**

	+	-	+/-	Why will it have this impact?
Community Cohesion	x			Supporting people with a disability to remain living in their own homes and communities through the prompt provision of a DFG will support good community cohesion. For example, adaptations such as a ramp and hand rails will help prevent people from becoming 'housebound' and help them to remain active members of their community.
Social Exclusion	x			Supporting people with a disability to remain living in their own homes and communities through the prompt provision of a DFG will help to prevent social exclusion. For example, adaptations such as a ramp and hand rails will help prevent

				people from becoming 'housebound' and help them to remain active members of their community.
Poverty	x			These proposals will enable those that are unable to afford adaptations to their homes access DFGs more promptly, which will have a positive impact on those affected by poverty. Whilst the reintroduction of a means test will have a financial impact on those that are no longer eligible for a DFG, those that are assessed as ineligible will have the financial means to fund the necessary works.

**What action will be taken to improve positive or mitigate negative impacts?**

No further actions required as the purpose of the proposals is to support those most in need of a DFG to access the works they require more promptly.

**6. Welsh**

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on:				
- people's opportunities to use the Welsh language			x	There is no change to the application process which is in line with the Councils commitment to the Welsh Language.
- treating the Welsh and English languages equally			x	There may be an indirect positive impact on the Welsh Language duty in respect of DGFs enabling Welsh Speakers to remain living in their own homes and thereby remain members of their local Welsh speaking communities.

**What action will be taken to improve positive or mitigate negative impacts?**

No further actions required as the purpose of the proposals is to support those most in need of a DFG to access the works they require more promptly.

**7. Biodiversity**

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			x	The proposals are unlikely to have any impact on the Councils biodiversity duty.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			x	

**What action will be taken to improve positive or mitigate negative impacts?**

No further actions required.

### 8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. <b>Long term</b> – looking at least 10 years (and up to 25 years) ahead	These proposals help to ensure that the available funding is targeted to those most in need of a DFG so that people with a disability are able to access adaptations that are essential to promoting their long term independence.
ii. <b>Prevention</b> – preventing problems occurring or getting worse	DFGs play an essential role in preventing people from requiring statutory support services and enabling people to live safely within their home.
iii. <b>Collaboration</b> – working with other services internal or external	The adaptation service works very closely with the Occupational Therapist team with the OTs providing the recommendations of what the applicant requires, the service also works very closely with the third sector organisation Care & Repair ,who deliver all the small grants such as handrails and grabrails and steps.

iv. <b>Involvement</b> – involving people, ensuring they reflect the diversity of the population	DFGs are provided in order to help people undertake key adaptations to their home in line with their personal needs that have been assessed by the Occupational Therapist. These assessments are person centred and strength based in order to help people achieve the outcomes that matter to them.
v. <b>Integration</b> – making connections to maximise contribution to:	
<b>Council’s well-being objectives</b>	Supports Well-being Objective 2 - All communities are thriving and sustainable by supporting people to remain living more independently in their own homes and communities.
<b>Other public bodies objectives</b>	DFGs helps to reduce demand for statutory social care support services and helps to reduce hospital admissions, alongside promoting prompt hospital discharge.

## 9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

Quarterly KPIs to monitor waiting times, number of works completed and number of adaptations over the £36k limit (e.g. extensions) will help to identify the impact of the proposals. Complaints will also be analysed to understand any unintended negative impacts.

## 10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	<b>Conclusion</b>
<b>Equalities</b>	Justification - On balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.
<b>Socio Economic Disadvantage</b>	Positive Impact
<b>Community Cohesion/ Social Exclusion/Poverty</b>	Positive Impact
<b>Welsh</b>	Neutral/Positive Impact
<b>Biodiversity</b>	N/A
<b>Well-being of Future Generations</b>	Positive Impact

### **Overall Conclusion**

Please indicate the conclusion reached:

**Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities

Please provide details of the overall conclusion reached in relation to the initiative

Proposal 1 - may have a negative impact on those disabled people that would no longer be able to access a DFG for small & medium works due to the reintroduction of the means test, as they would need to self-fund their adaptations. However, those excluded from accessing a DFG will be assessed as having the financial ability to fund small and medium works and this needs to be balanced with the positive impact this proposal will have on those disabled people that do not have the financial means to fund home adaptations.

Our data shows that waiting times for adaptation works has notably increased, one of the main reasons for this is due to the significantly increased demand for DFGs following the removal of the means test for small and medium works. This increased demand is resulting in disabled people that do not have the financial means to undertake the necessary adaptations waiting for extended periods of time. Extended waiting times for these works can have a negative impact on a persons independence and can result in the person requiring statutory care services or no longer being able to remain in their home.

As such, on balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.

Proposal 2 – will have a positive impact on those people with a disability that require more costly works to remain living safely and independently in their homes.

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## 11. Actions

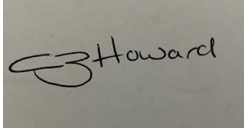
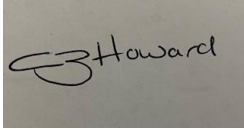
What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
--------	--	--------------------------	--



Undertake 6 week consultation in respect of the reintroduction of a means test	Rob Davies	Before final policy is presented to Cabinet for decision.	Feedback from consultation informs decision making.
Quarterly KPIs for waiting times, number of works over £36k and number of works completed	Rob Davies	Quarterly	Reduction for waiting times Increased number of works completed and Increased number of works costing over £36k

## 12. Sign off

	Name	Position	Signature	Date
<b>Completed by</b>	<b>Chelé Zandra Howard</b>	<b>Head of Housing &amp; Communities</b>		<b>19/08/24</b>
<b>Signed off by</b>	<b>Chelé Zandra Howard</b>	<b>Head of Service</b>		<b>19/08/24</b>

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Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## NEATH PORT TALBOT COUNCIL

### CABINET

2<sup>nd</sup> October 2024

### Report of the Head of Planning and Public Protection Ceri Morris

#### Matter for Decision

**Wards Affected: All Wards**

**Part IV Environment Act 1995 – Consideration of the Draft Air Quality Action Plan (2024-2029) and the consultation procedures to be implemented.**

#### Purpose of the Report

To consider the Draft Air Quality Action Plan along with the consultation / engagement procedures to be implemented.

#### Executive Summary

The draft Air Quality Action Plan has been produced as part of statutory duties placed on the Local Authority by the Local Air Quality Management framework.

The plan outlines the actions required to improve air quality in Neath Port Talbot between 2024 and 2029, to ensure that the daily mean PM<sub>10</sub> Air Quality Objective (AQO) is met. Upon publication, it will replace the previous Action Plan which covered the period 2012 to 2024.

This report seeks Member endorsement of the Draft Air Quality Action Plan for the purposes of consultation.

#### Background

In 2000 the Council declared an Air Quality Management Area (AQMA) for Taibach–Margam, due to exceedances of the national Air Quality Objective (AQO) for daily mean particulate matter (PM<sub>10</sub>).

Whilst the PM<sub>10</sub> daily AQO was not exceeded from 2018 through to 2022, the daily mean AQO at the 'Prince Street 2' monitoring station was exceeded in 2023; hence the Air Quality Management Area continues to remain in place.

The Council is required to review and revise its Air Quality Action Plan in order to achieve the prescribed air quality objectives. When considering revisions to the Action Plan, the Council is required to consult and engage widely with the public and stakeholders.

Following the formal consultation process, all comments and observations received will be reviewed and a final version of the Action Plan will be prepared and reported back to Members.

### **Draft Air Quality Action Plan (2024-2029)**

The Draft Air Quality Action Plan is presented in full in Appendix 2.

The Action Plan presents a summary of the current air quality in Neath Port Talbot; sets the current issues within the broader context; presents the Council's air quality priorities; and ultimately presents the measures and priority actions to improve air quality across the County Borough.

Members should note that all proposed measures / actions are presented in Table 5-1, which contains:

- A list of the actions that form part of the Plan.
- The responsible individual and/or Department/Organisation who will deliver the respective action.
- An estimated cost of implementing each action (i.e. overall cost and cost to the Local Authority).
- The expected benefit in terms of pollutant emission and/or concentration reduction (ranked as 'high', 'medium' and 'low').
- The timescale for implementation.
- How progress will be monitored.

The Air Quality Action Plan will be subject to an annual review and appraisal of progress. Progress each year will be reported in the 'Annual Status Reports' (ASRs) produced by the Council as part of our statutory Local Air Quality Management duties.

### **Consultation and Engagement Procedures**

Members should note that the Air Quality Action Plan has already been the subject of stakeholder engagement and workshops, which has enabled the preparation of the current draft.

Subject to Member approval, the next step will be for the draft Action Plan to be subject to a formal statutory period of consultation. With the feedback from the consultation, a final version of the Action Plan will be prepared and brought back to Members for approval – this is likely to be towards the end of 2024.

The draft Air Quality Action Plan has been produced with engagement from a Steering Group, which comprised of members from the Council, Natural Resources Wales, Public Health Wales and local businesses operating Environmental Permits in the area.

The Council must now undertake a 28-day public consultation process with interested local organisations and bodies (e.g. residents and local businesses affected by the AQAP measures), which will be done via the Council's website.

As part of the formal consultation process, officers will also directly correspond with consultees, namely Secretary of State for Wales; Welsh Government / DEFRA; Natural Resources Wales; South Wales Trunk Road Agent (SWTRA); Neath Port Talbot Council Highways; Neighbouring Local Authorities; Public Health Wales and Swansea Bay University Health Board.

## **Financial Impacts**

The projects and initiatives to be delivered by the Council, to achieve the measures in the Action Plan, will be funded using a combination of existing budgets and new external sources of funding such as the Welsh Air Quality Grant. Where currently available, an estimate of cost of the measures is included in the Action Plan.

Given the current financial pressures on budgets however, further financial appraisals will be required, and it may not be possible to achieve all of the measures set out in the plan due to cost, especially where a specific budget has not been identified.

Members should note that the Council does not have direct control over the delivery of all of the projects and initiatives contained in the Action Plan. Their implementation therefore will rely on the responsible organisation being able to fund and implement the measure.

## **Integrated Impact Assessment**

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

The first stage assessment, presented in Appendix 1, has indicated that a more in-depth assessment is not required.

## **Valleys Communities Impacts**

No implications.

## **Workforce Impacts**

No implications.

## **Legal Impacts**

The statutory framework for air quality management is contained in Part IV of the Environment Act 1995 (as amended). Any alleged failure to conduct a lawful consultation, or to have proper regard to the responses received, when adopting the final version of the Air Quality Action Plan, may be subject to a legal challenge.

## **Risk Management Impacts**

The Council will be in breach of its statutory duties to prepare, consult upon and publish an Air Quality Action Plan should there be a failure to implement the proposed recommendations.

## **Scrutiny Observations**

The Air Quality Action Plan Report was considered at Education, Skills and Well-being Scrutiny Committee on 12<sup>th</sup> September 2024. While no substantive questions were raised or amendments required to the Action Plan, officers were required to confirm that the public would have the opportunity to comment as part of the wider consultation, and also clarify that in relation to Measure 26 (Table 5-1) concerning the transition of the Council Fleet to 'low emission transport', there were no year-on-year targets specified with the Action Plan.

## **Recommendations**

That having considered the report and having due regard to the Integrated Impact Assessment, it is recommended that:

1. The Draft Air Quality Action Plan (2024-2029) as presented in Appendix 2 be agreed for the purposes of consultation.
2. The consultation procedures as set out in the report are implemented.

### **Reasons for Proposed Decision**

The decisions are needed to ensure compliance with the requirements of Part IV of the Environment Act 1995.

### **Implementation of Decision**

The decision is proposed for implementation after the three day call in period.

### **Appendices**

Appendix 1 – First Stage Integrated Impact Assessment.  
Appendix 2 – Draft Air Quality Action Plan 2024-2029

### **List of Background Papers**

Local Air Quality Management Policy Guidance.

### **Officer Contact**

Celvin Davies – General Environmental Health Manager  
Tel: 01639 685613 or email [c.davies13@npt.gov.uk](mailto:c.davies13@npt.gov.uk)

## Appendix 1: First Stage Integrated Impact Assessment

### 1. Details of the initiative

<b>Initiative Description and Summary: Draft Air Quality Action Plan</b>
<b>Service Area: Planning &amp; Public Protection</b>
<b>Directorate: Environment &amp; Regeneration</b>

### 2. Does the initiative affect:

	Yes	No
Service users		x
Staff		x
Wider community	x	
Internal administrative process only		x

### 3. Does the initiative impact on people because of their:

	Yes	No	None/ Negligible	Don't Know	Impact H/M/L	Reasons for your decision (including evidence)/How might it impact?
Age		X				Action required to comply statutory air quality requirement
Disability		X				Action required to comply statutory air quality requirement
Gender Reassignment		X				Action required to comply statutory air quality requirement
Marriage/Civil Partnership		X				Action required to comply statutory air quality requirement
Pregnancy/Maternity		X				Action required to comply statutory air quality requirement
Race		X				Action required to comply statutory air quality requirement
Religion/Belief		X				Action required to comply statutory air quality requirement
Sex		X				Action required to comply statutory air quality requirement
Sexual orientation		X				Action required to comply statutory air quality requirement



**4. Does the initiative impact on:**

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence used) / How might it impact?
People's opportunities to use the Welsh language		x				Action required to comply statutory air quality requirement
Treating the Welsh language no less favourably than English		x				Action required to comply statutory air quality requirement

**5. Does the initiative impact on biodiversity:**

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence) / How might it impact?
To maintain and enhance biodiversity		x				No negative impact anticipated. The Air Quality Limits identified in the report are used by legislation as a measure of regulatory compliance for Air Quality in the UK.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.		x				Air Quality Standards are concentrations recorded over a given time period, which are considered to be acceptable in terms of what is scientifically known about the effects of each pollution on health and on the environment. They can also be used as a benchmark to indicate whether air pollution is getting better or worst.  Implementation of the actions contained in the draft Air Quality Action Plan will not negatively impact biodiversity or ecosystems but will help achieve better air quality, which will have a positive effect on biodiversity and ecosystems.

**6. Does the initiative embrace the sustainable development principle (5 ways of working):**

	Yes	No	Details

<b>Long term</b> - how the initiative supports the long-term well-being of people	X		The links between Air Quality and Health impact are widely reported. Any improvements to Air Quality will have a positive impact on the long term well being of people in Neath Port Talbot.
<b>Integration</b> - how the initiative impacts upon our wellbeing objectives	X		The Air Quality Action plan will contribute towards 'Well-being Objective 2: All our communities will be thriving and sustainable', so that we can maintain and enhance resilient communities and a resilient natural environment.
<b>Involvement</b> - how people have been involved in developing the initiative	X		A stakeholder group comprising of partner organisations and local businesses with an environmental permit has been established. A workshop took place with the stakeholder group, and their comments and feedback to date has been absorbed into to the draft Air Quality Action Plan. The next step is to undertake wider Engagement and Consultation with the public and stakeholder group.
<b>Collaboration</b> - how we have worked with other services/organisations to find shared sustainable solutions	X		A stakeholder group of other services and organisations fed into the development of the draft air quality action plan.
<b>Prevention</b> - how the initiative will prevent problems occurring or getting worse	X		The measures set out in the draft air quality action aim to reduce air pollution and put in place specific actions to prevent breaches of air quality objectives.

### 7. Declaration - based on above assessment (tick as appropriate):

A full impact assessment (second stage) <b>is not</b> required	X
Reasons for this conclusion: Action required to comply statutory air quality requirement to produce an Air Quality Action Plan.	
A full impact assessment (second stage) <b>is</b> required	
Reasons for this conclusion	

	Name	Position	Date
Completed by	Celvin Davies	General Environmental Health Manager	16/08/2024
Signed off by	Ceri Morris	Head of Planning & Public Protection	16 <sup>th</sup> August 2024



Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

# Neath Port Talbot County Borough Council Air Quality Action Plan

In fulfilment of Part IV of the Environment Act 1995

Local Air Quality Management

2024-2029

**Neath Port Talbot County Borough Council**

<b>Information</b>	<b>Neath Port Talbot County Borough Council Details</b>
<b>Local Authority Officer</b>	Leah Morgan
<b>Department</b>	Planning and Public Protection
<b>Address</b>	Environmental Health, Neath Port Talbot Council, The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG
<b>Telephone</b>	01639 686868
<b>E-mail</b>	environment@npt.gov.uk
<b>Report Reference Number</b>	<Enter Report Reference>
<b>Date</b>	<Enter Date of Report>

## Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It is required due to the Air Quality Management Area (AQMA) declared for Margam-Taibach, due to exceedances of the national Air Quality Objective (AQO) for daily mean particulate matter (PM<sub>10</sub>). Whilst the AQO was not exceeded from 2018 through to 2022, Prince Street 2 did exceed the daily mean AQO in 2023; hence the AQMA should continue to remain in place.

This action plan outlines the action we will take to improve air quality in Neath Port Talbot between 2024 and 2029 to ensure that the daily mean PM<sub>10</sub> AQO is met. It replaces the previous action plan which ran from 2012 to 2024.

Projects delivered through the past action plan include:

- Knowledge sharing and collaborative working through the PM<sub>10</sub> Steering Group, Data Team, Regulator's Team and Industrial Forum, with Welsh Government, Natural Resources Wales, and permitted industrial operators (Tata, Tata suppliers and sub-contractors and Costain).
- NPTCBC provides email alerts to other organisations to help resolve emerging poor air quality situation. These alerts are based on automatic PM<sub>10</sub> monitoring stations operated by NPTCBC.
- Ongoing dust reduction programme/improvement works at the Steelworks, aimed at identifying and quantifying sources of dust. This is one of a number of interventions carried out by Natural Resources Wales, together with industry operators, and implemented through the IPPC permitting process.
- Ongoing planning policy requirements for proposed new or expanded activities or developments with the potential to impact the AQMA will be reviewed, and where these pose a significant risk to Air Quality Objectives, they will be assessed in accordance with the Environment Agency HORIZONTAL GUIDANCE NOTE IPPC H1: "Environmental Assessment and Appraisal of BAT" MODULE 3 Quantify Impacts – ISBN 011 3101082.

- Port Talbot Peripheral Distributor Road (PDR) relief road providing a bypass of the A48.
- Ongoing regulation of NPTCBC and Natural Resources Wales permitted industrial activities by respective organisations.
- Transport planning through the development control process.
- School travel planning.
- Discouraging bonfires through education and diversion of green waste for composting.
- Monthly street sweeping in Taibach Margam.
- Air alerts to the public.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas<sup>1,2</sup>.

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion<sup>3</sup>. NPTCBC is committed to reducing the exposure of people in NPTCBC to poor air quality in order to improve health.

We have developed actions that can be considered under nine broad topics:

- Alternatives to private vehicle use
- Environmental permits
- Policy guidance and development control

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<sup>1</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010

<sup>2</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

<sup>3</sup> Defra. Abatement cost guidance for valuing changes in air quality, May 2013

- Promoting low emission plants
- Promoting low emission transport
- Promoting travel alternatives
- Public information
- Transport planning and infrastructure
- Traffic management

Our priorities are:

- Priority 1 - Improve overall air quality across the borough
- Priority 2 - Through collaborative working, ensure that wider strategic air quality action is implemented through existing policy areas
- Priority 3 - Developing partnerships and public education
- Priority 4 - Assess and manage PM<sub>2.5</sub> exposure

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as vehicle emissions standards agreed in Europe), but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond NPTCBC's direct influence.

### **Responsibilities and Commitment**

This AQAP was prepared by the Planning and Public Protection of NPTCBC with the support and agreement of the following officers and departments:

- Celvin Davies, General Environmental Health Manager, Planning and Public Protection
- Gareth Liley, Environmental Health Team Leader, Planning and Public Protection
- Leah Morgan, Senior Environmental Health Officer, Planning and Public Protection

## Neath Port Talbot County Borough Council

- Michael Roosmalen, Pollution Control Officer, Planning and Public Protection
- David Morris, Planning Policy Officer
- Chris Davies, Development Manager Planning
- Laura Pack, Active Travel
- Steve Owen, Highways
- Daniel Rees, Lighting and Buildings Services Manager
- Rebecca Sharp, Planning Policy - Countryside

On behalf of Neath Port Talbot County Borough Council, this AQAP has been approved by: \_\_\_\_\_ Signature

\_\_\_\_\_ Name  
Job Title

On behalf of Swansea Bay University Health Board, this AQAP has been signed off by:

\_\_\_\_\_ Signature  
\_\_\_\_\_ Name  
\_\_\_\_\_ Job Title

This AQAP will be subject to an annual review, appraisal of progress and an update report provided to Neath Port Talbot County Borough Council's Cabinet Committee. Progress each year will be reported in the Annual Status Reports (ASRs) produced by Neath Port Talbot County Borough Council, as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP please send them to Leah Morgan at:  
Neath Port Talbot County Borough Council, The Quays, Brunel Way, SA11 2GG  
07976238241, l.morgan@npt.gov.uk



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# 1 Introduction

This report outlines the actions that Neath Port Talbot County Borough Council (NPTCBC) will deliver between 2024-2029 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to Neath Port Talbot.

It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within NPTCBC's air quality annual progress reports (APR).

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## 2 Summary of Current Air Quality in Neath Port Talbot

### 2.1 Overview of PM<sub>10</sub> in Neath Port Talbot

Neath Port Talbot declared an Air Quality Management Area (AQMA) for exceedance of the 24-hour mean Air Quality Objective (AQO) for PM<sub>10</sub> on 1st July 2000. The AQO limit is for no more than 35 exceedances of a 24-hour mean PM<sub>10</sub> concentration of 50 µg/m<sup>3</sup> in a calendar year. Taibach Margam AQMA encompasses an area of land and properties between then Corus Steel, now Tata Steel, and the M4 Motorway, as shown in Figure 2-1.

**Figure 2-1 Map of the Taibach Margam AQMA and PM<sub>10</sub> automatic monitoring stations**



The trend since declaration of the Taibach Margam AQMA in 2000 is towards lower pollution levels, and there have been no breaches of the AQO for daily mean PM<sub>10</sub> since 2015 to 2022, however in 2023, Prince Street 2 did exceed the daily mean PM<sub>10</sub> AQO. The status of the AQMA will continue to be kept under review by NPTCBC and Welsh Government given the recent exceedance. Overall, it is considered important that the AQMA remains in place for the following reasons:

- To allow for a period of post Covid air quality monitoring, to establish any impact that Covid had on the pollution levels and to see if long term changes in working practices has an impact on the AQMA.
- A period of monitoring to allow investigation into the impact that the reduced M4 speed limit has had on the AQMA.
- Completion of the Vortex Air Quality Monitoring Pilot Study that aims to more effectively target interventions, identify particular pollution hotspots and sources that were previously hidden, and gain a better understanding of the impact of particular policies; crucial to designing effective strategies for managing air pollution. Further information is available on our website at <https://www.npt.gov.uk/28695>.
- Considerations of any new requirements imposed by the Clean Air Bill which is scheduled for introduction during the second year of this Senedd term<sup>4</sup>.
- Noted increases in days exceeding the daily PM<sub>10</sub> concentration limit at PT2 Margam monitoring site in 2021 and 2022 which has now exceeded the daily mean AQO in 2023.

The identification of a new exceedance at the Prince Street monitor would ordinarily have triggered a Detailed Assessment to establish the boundary of an AQMA. However, Prince Street is located within the current AQMA in the Taibach Margam area (see Figure 2-1) which was declared in July 2000. The Council has given consideration to whether or not the boundary should be amended, however, for the following reasons it is not considered necessary;

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<sup>4</sup> <https://www.gov.wales/written-statement-publication-white-paper-clean-air-wales-bill-summary-responses>

- The exceedance falls within the existing AQMA
- The source of the exceedance remains the same, i.e., the Steelworks
- Nearby monitors closer to the AQMA boundary are not exceeding the AQO
- The boundary encompasses all sensitive receptors in the area
- Any mitigation for the exceedance will be provided by this AQAP

It is unlikely that the AQMA would be considered for revocation in the near future unless it meets the daily mean PM<sub>10</sub> AQO for at least three years.

## 2.2 PM<sub>10</sub> monitoring results for 2018-2022

Table 2-1 and Table 2-2 present PM<sub>10</sub> monitoring results at the five industrial sites for the last six years, for the 24-hour and annual mean respectively. Whilst the AQO was not exceeded from 2018 through to 2022, Prince Street 2 did exceed the daily mean AQO in 2023; the daily mean PM<sub>10</sub> concentrations were exceeded on 46 days, 11 days more than is allowed by the AQO.

**Table 2-1 24-Hour Mean PM<sub>10</sub> Monitoring Results 2018-2023, Number of PM<sub>10</sub> 24-Hour Means > 50 µg/m<sup>3</sup>**

Site ID	Site Name	2018	2019	2020	2021	2022	2023
PT2	Margam	11	12	11	33	23	32
DS1	Dyffryn School	-	2	0	0 (22)	2 (30)	3
LW1	Little Warren	9	9	15	7	6 (33)	11
PS2	Prince Street 2	12	8	16	3 (40)	20 (47)	46
TW1*	Twll-yn-y-Wal Park	9	10	7	0 (39)	-	-

For years with invalid data capture (less than 85%). The 90.4<sup>th</sup> percentile has been provided in brackets ().

\*This site stopped monitoring in March 2021.

Red – exceeds the daily mean PM<sub>10</sub> AQO



**Table 2-2 Annual Mean PM<sub>10</sub> (µg/m<sup>3</sup>) and Data Capture % Monitoring Results 2018-2023**

Site ID	Site Name	2018	2019	2020	2021	2022	2023
PT2	Margam	23 (96%)	21 (95%)	21 (95%)	25 (92%)	26 (94%)	27 (93%)
DS1	Dyffryn School	-	22 (74%)	23 (67%)	25 (5%)	17** (60%)	19 (95%)
LW1	Little Warren	21 (85%)	20 (89%)	21 (98%)	18 (91%)	27** (63%)	21 (98%)
PS2	Prince Street 2	23 (93%)	20 (89%)	24 (83%)	20 (53%)	19** (75%)	29 (99%)
TW1*	Twll-yn-y-Wal Park	21 (99%)	21 (96%)	20 (91%)	20 (21%)	-	-

All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%.

\*This site stopped monitoring in March 2021.

\*\*Years with invalid data capture (less than 75%) have not yet been annualised for 2022

## 2.3 Overview of additional air quality issues in Neath Port Talbot

This AQAP is predominantly focused on the pollutant for which the Air Quality Management Area (AQMA) has been declared – for daily mean PM<sub>10</sub>. However, Neath Port Talbot would like to move away from concentrating solely on targets and work towards continual improvement of air quality in throughout the borough.

There are additional pollutants which are of concern in Neath Port Talbot, however, these do not fall under LAQM. They are: PAHs (in particular Benzo[a]Pyrene) and Nickel, responsibility for meeting air quality limit values is devolved to the national administrations and therefore is the responsibility of WG, however, NPT work closely with them and other partner agencies to achieve this.

Large particulates/nuisance dust is an issue in Neath Port Talbot, there are no official objective or limits for this but Neath Port Talbot work with partner agencies, businesses and other interested parties to address the sources of dust.

New limits for PM<sub>2.5</sub> are expected soon and Neath Port Talbot are starting proactive work including measures within this plan to monitor and address PM<sub>2.5</sub> including the installation of 3 new PM<sub>2.5</sub> monitoring sites in 2022. These additional pollutants of concern are all constituents of Particulate Matter (PM). Many of the measures in this AQAP designed to target PM may have a positive impact on reducing these additional pollutants of concern, however the actions do not specifically target these additional pollutants.

### **Large particulates (nuisance dust) fallout in Port Talbot**

Nuisance dust remains an important issue of concern to residents in Port Talbot, and there are a number of potential sources which include activities at the steel works.

Nuisance dust is monitored by NPTCBC via deposit gauges, at the same locations as the automatic PM<sub>10</sub> monitoring. There is no statutory nuisance dust limit however a value of 200 mg/m<sup>2</sup> of dust per day is recommended as the threshold for nuisance by the Institute of Air Quality Management (IAQM). However, it should be noted that the public perception of what constitutes a nuisance might suggest a lower limit would be more appropriate. The Minerals Technical Advice note<sup>5</sup> from Welsh Government suggests a limit of 80 mg/m<sup>2</sup> per day for coal working. NPTCBC uses the following nuisance dust fallout categories to monitor the nuisance dust situation:

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<sup>5</sup> <https://www.npt.gov.uk/media/15338/npt-aq-progress-report-2020.pdf?v=20210309102532>

**Table 2-3 Nuisance dust fallout categories used by NPTCBC**

Fallout rate mg/m <sup>2</sup> /day	Category
< 40	Low
40 to 79	Moderate
80 to 159	High
> 159	Very high

During 2022 the maximum deposition rate at three sites (Prince Street, Little Warren and Port Talbot Fire Station) exceeded the IAQM nuisance limit of 200 mg/m<sup>2</sup> of dust per day w. The average deposition rates for all sites were below the IAQM nuisance limit of 200 mg/m<sup>2</sup> of dust per day.

The Minerals Technical Advice Limit of 80 mg/m<sup>2</sup>/day was exceeded at four out of six sites (Dyffryn Upper School, Little Warren, Port Talbot Fire Station and Prince St Margam) for the maximum deposition rate.

**Table 2-4 Summary of Dust Deposition Results (in 2022)**

Site	Maximum Deposition (mg/m <sup>2</sup> /day)	Average Deposition (mg/m <sup>2</sup> /day)
Prince St, Port Talbot	<b>201</b>	103.5
Tairwaith Community Hall	127	45.5
Little Warren, Port Talbot	<b>270</b>	48.7
Wembley Avenue, Onllwyn	190	53.8
Dyffryn Upper School, Bertha Road, Port Talbot	188	72.7
Port Talbot Fire Station	<b>508</b>	88.7

**Bold** – exceeds the IAQM nuisance limit.

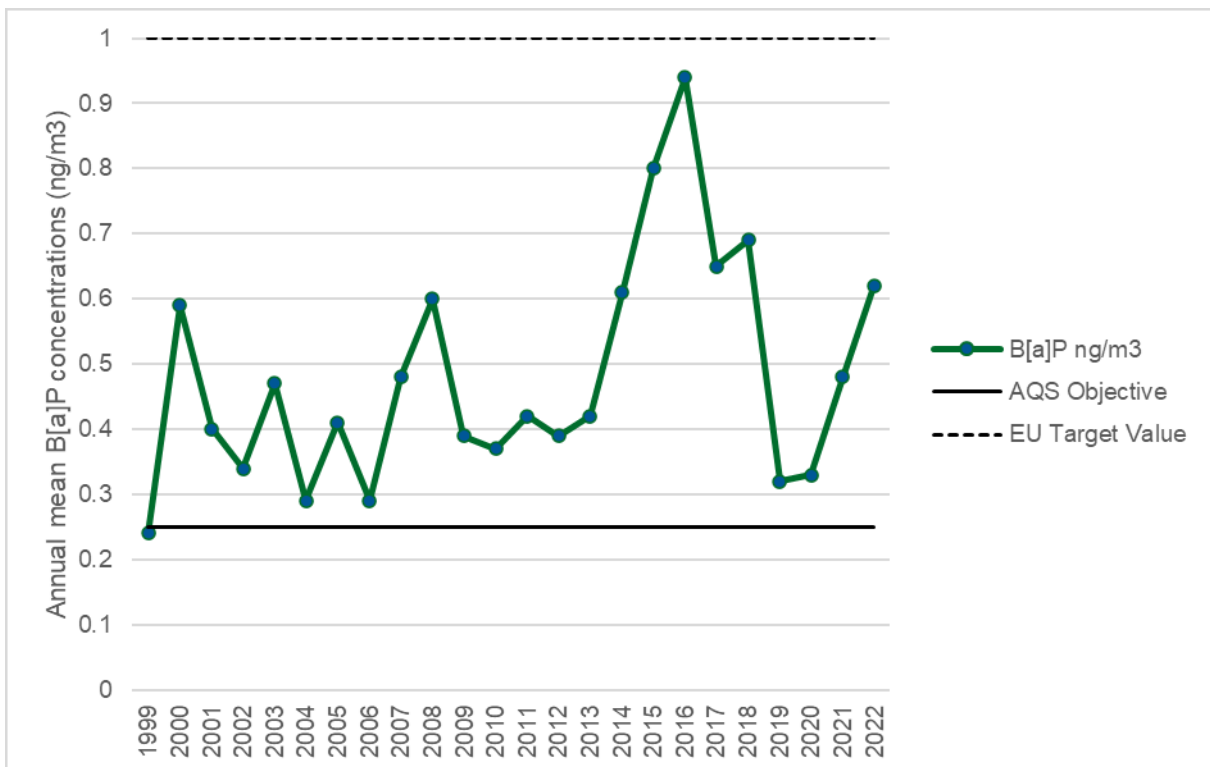
### **Polyaromatic hydrocarbons (PAH) in Port Talbot**

PAHs comprise a large group of compounds consisting of hydrocarbons containing two or more benzene rings fused together or to other hydrocarbon rings. They are formed during the combustion of fuels such as coal and oil at high temperatures.

PAHs typically occur in complex mixtures and not as individual compounds. They are present in the atmosphere as a component of airborne particulate matter (PM).

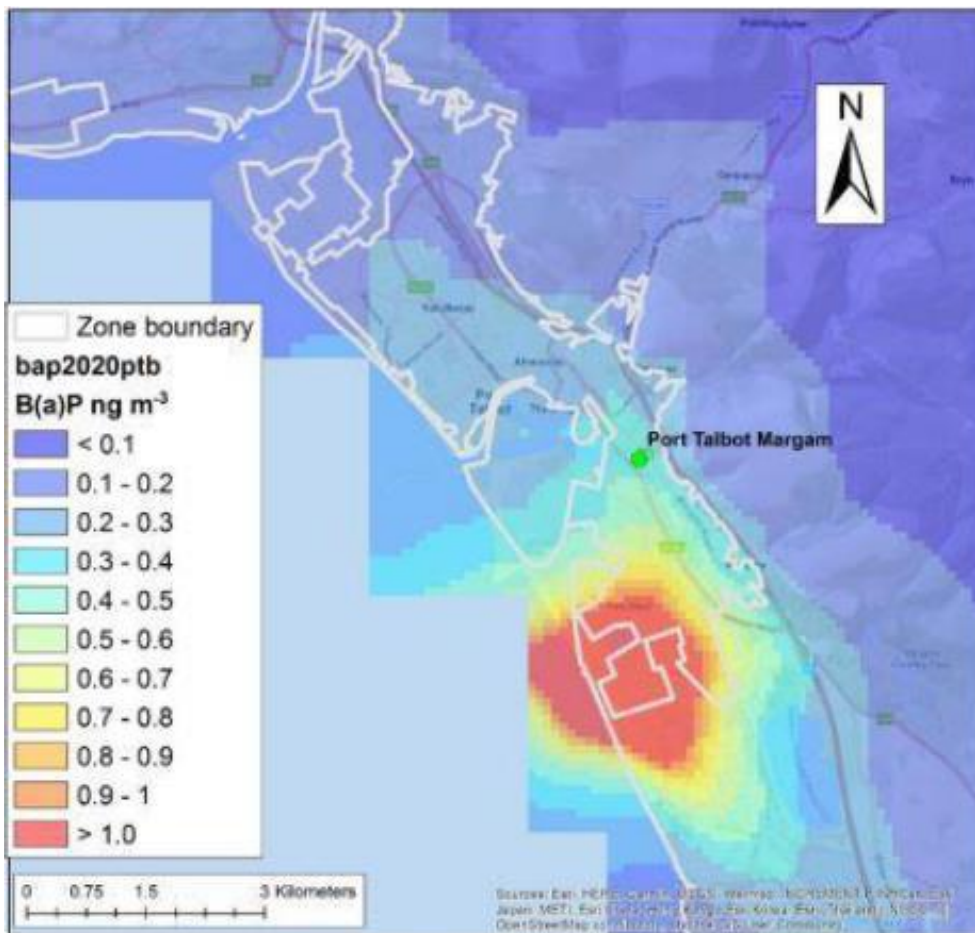
One specific PAH of concern: Benzo[a]Pyrene (**BaP**) is non-compliant with the National Air Quality Objective of 0.25 ng/m<sup>3</sup>. The long-term trend is increasing and the 2021 result almost tripled compared with the 2020 concentration.

Figure 2-2 Benzo[a]pyrene Annual Averages 1991-2022



This is also an issue which is related to activities at the Port Talbot steel works e.g. coke ovens. More on this can be found in the technical report on UK supplementary modelling assessment under the Air Quality Standards Regulations 2010 for 2020. The regulator (NRW) is working with Tata in order to address this issue.

**Figure 2-3 Modelled Total Annual Mean B[a]P Concentrations in the Vicinity of the Coke Ovens at the Port Talbot Steelworks in 2020**



Contains Ordnance Survey data © Crown copyright and database right [2022]

### Nickel in Pontardawe

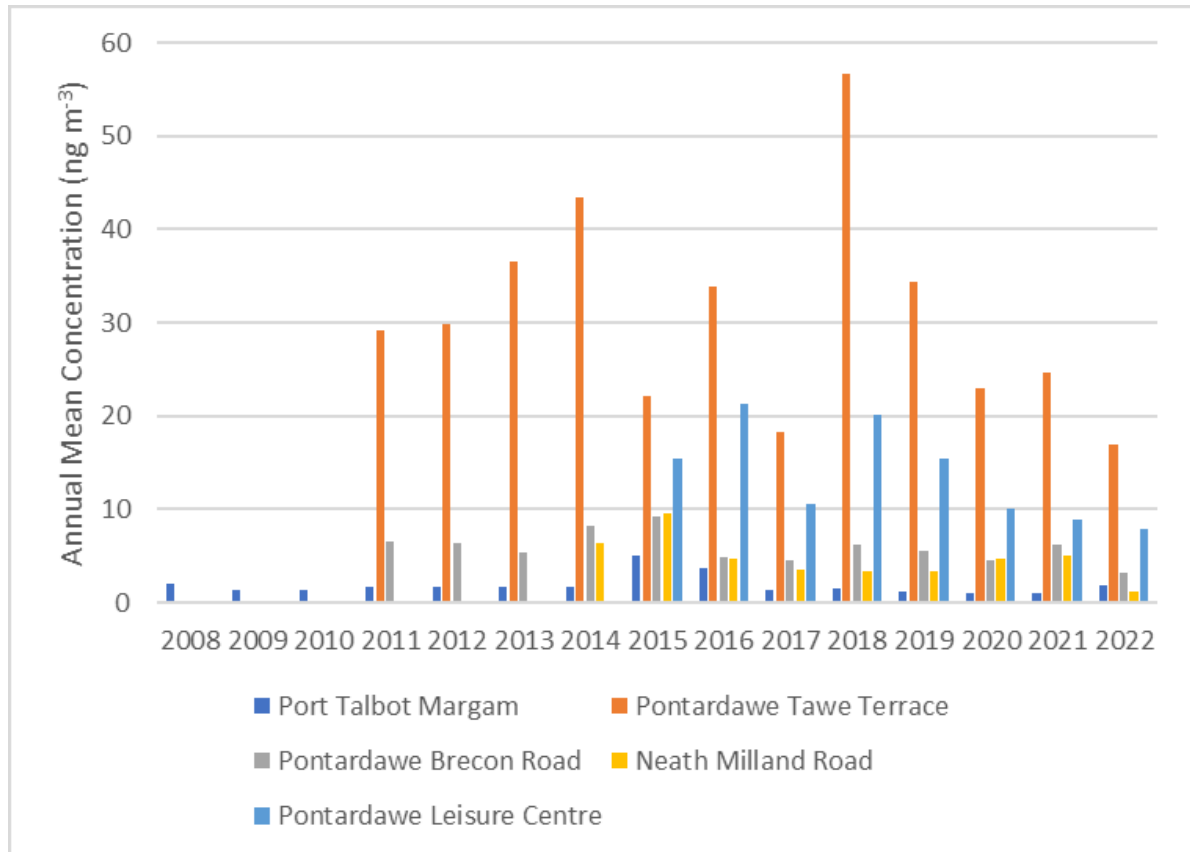
Nickel is a heavy metal which is present in the atmosphere as a component of airborne particulate matter (PM). The main source of raised nickel levels in Pontardawe is the Wall Colmonoy works, which is regulated by the Council. 2021 was not compliant and has increased compared to 2020.

The target value for the total nickel content in the PM<sub>10</sub> fraction averaged over a calendar year in ambient air is 20 ng/m<sup>3</sup>. The average concentration of nickel in 2022 was 18.6 ng m<sup>-3</sup> which is 93% of the Target value. This is a decrease from 2021 (24.4 ng m<sup>-3</sup>). The maximum weekly concentration observed was 75.3 ng/m<sup>3</sup>.

Information received from Wall Colmonoy confirmed there were fan changes in the Atomising Dry extraction system which caused a release of fugitive emissions from

the ductwork that coincided with an exceedance of the target value in November 2021. Emissions reported for the Vale refinery were stable throughout the year, showing no clear correlation with ambient nickel concentrations.

**Figure 2-4 Trend in Annual Mean Concentrations of Nickel 2008 - 2022**



**PM<sub>2.5</sub>**

Monitoring of PM<sub>2.5</sub> in Neath Port Talbot demonstrates that this pollutant is well under the UK and EU annual mean target of 25 µg/m<sup>3</sup>. However, NPTCBC consider it important to keep PM<sub>2.5</sub> under close review as new targets were introduced for PM<sub>2.5</sub> in England in December 2022<sup>6</sup>, and the 2023 Environment (Air Quality and Soundscapes) (Wales) Act contains a requirement for Ministers to set a new PM<sub>2.5</sub>

<sup>6</sup>

[https://www.legislation.gov.uk/ukdsi/2022/9780348242959#:~:text=The%20annual%20mean%20concentration%20target%20is%20that%20by%20the%20end,%E2%80%9Cthe%20target%20level%E2%80%9D\).](https://www.legislation.gov.uk/ukdsi/2022/9780348242959#:~:text=The%20annual%20mean%20concentration%20target%20is%20that%20by%20the%20end,%E2%80%9Cthe%20target%20level%E2%80%9D).)

target for Wales. NPT introduced 3 new PM<sub>2.5</sub> monitors in 2022 and await further details on the requirement of the Act.

Please refer to the latest [Annual Progress Report \(APR\)](#) from NPTCBC.

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## 3 NPTCBC's Air Quality Priorities

### 3.1 Public Health Context

Poor air quality represents the largest environmental risk to public health. Long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy.<sup>7</sup>

Public Health Wales estimates the burden of long-term air pollution exposure to be the equivalent of 1,000 to 1,400 deaths (at typical ages) each year.<sup>8</sup> In Wales, air pollution costs £1 billion every year from health service costs and lost work days.<sup>9</sup>

As outlined in section 2, this AQAP predominantly focuses on PM<sub>10</sub>. PM is a generic term used to describe a complex mixture of solid and liquid particles of varying size, shape, and composition. Some particles are emitted directly (primary PM); others are formed in the atmosphere through complex chemical reactions (secondary PM). The composition of PM varies greatly and depends on many factors, such as geographical location, emission sources and weather. The main sources of man-made PM are the combustion of fuels (by vehicles, industry and domestic properties) and other physical processes such as tyre and brake wear. Natural sources include wind-blown soil and dust, sea spray particles, and fires involving burning vegetation (see Figure 3-1).

PM is often classified according by aerodynamic size and referred to as:

- coarse particles (PM<sub>10</sub>; particles that are less than 10 microns (µm) in diameter)
- fine particles (PM<sub>2.5</sub>; particles that are less than 2.5 µm in diameter)
- ultrafine particles (PM<sub>0.1</sub>; particles that are less than 0.1 µm in diameter)

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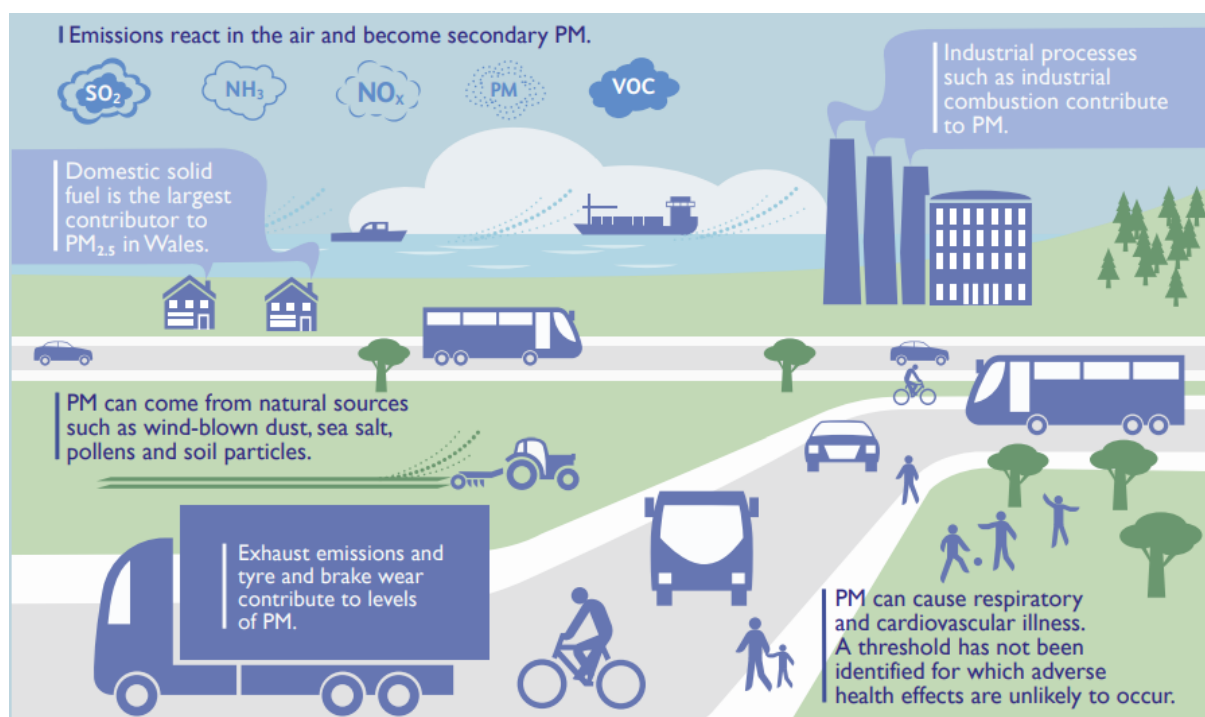
<sup>7</sup> <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

<sup>8</sup> <https://phw.nhs.wales/services-and-teams/environmental-public-health/air-quality/air-pollution-and-health-fact-sheet/>

<sup>9</sup> <https://phw.nhs.wales/services-and-teams/environmental-public-health/air-quality/reducing-health-risks-associated-with-road-traffic-air-pollution-in-wales-pdf/>



Figure 3-1 Sources and effects of particulate matter (PM), The Clean Air Plan for Wales<sup>10</sup>



The size of particles and the duration of exposure are key determinants of potential adverse health effects. Particles larger than 10 µm are mainly deposited in the nose or throat, whereas particles smaller than 10 µm pose the greatest risk because they can be drawn deeper into the lung. The strongest evidence for effects on health is associated with fine particles (PM<sub>2.5</sub>).

There is an extensive body of evidence that long-term exposure to PM increases mortality and morbidity from cardiovascular and respiratory diseases. Outdoor air pollution, particularly PM, has also been classified by the International Agency for Research on Cancer (IARC) as carcinogenic to humans (a Group 1 carcinogen) and causing lung cancer. There is some experimental evidence, however, that ultrafine particles may also pass through the lungs into the bloodstream.

Though air pollution can be harmful to anyone, some people are more affected as a result of where they live, the concentration of air pollution they are exposed to in their

<sup>10</sup> <https://www.gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf>

day-to-day lives, or their inherent susceptibility to health problems caused by air pollution. Those who are more susceptible include older people, children, those with pre-existing cardiovascular or respiratory disease, pregnant women, communities in areas of deprivation, higher pollution and low-income communities.

Generally, more air pollution sources and higher pollutant concentrations are found in more socially disadvantaged areas, consequently air pollution tends to cause most harm to people in socially deprived groups<sup>11</sup>. For those on low incomes problems are compounded as they are more likely to have existing medical conditions, they are more likely to live in areas with poorer outdoor and indoor environments and have less access to jobs, healthy food, decent housing and green spaces, which all contribute to poorer health<sup>12</sup>.

It is important to consider how vulnerability to pollution impacts is unevenly experienced by different groups in society, where possible action needs to be focussed on pollution/deprivation hotspots. This will help to reduce scenarios where air pollution is exacerbating the existing health disparities associated with deprivation and will provide a focus for the most effective actions in terms of improving public health. It is important to also consider when implementing measures to improve air quality whether they could put disadvantaged communities at further disadvantage, either economically or because generalised air quality improvements can mask pockets of deteriorating air quality, for example through displacement activity.

## 3.2 Planning and Policy Context

### 3.2.1 National Context

The Environment Act 1995 and subsequent updates within the Environment Act 2021 gives local authorities responsibilities and duties for air quality at a local level. This includes the responsibility to review and assess key pollutants. The Local Air Quality

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<sup>11</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/690846/CMO\\_Annual\\_Report\\_2017\\_Health\\_Impacts\\_of\\_All\\_Pollution\\_what\\_do\\_we\\_know.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/690846/CMO_Annual_Report_2017_Health_Impacts_of_All_Pollution_what_do_we_know.pdf)

<sup>12</sup> <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

Management (LAQM) framework requires local authorities to annually review and assess air quality. It is a statutory duty of the County Borough Council to declare an Air Quality Management Area (AQMA) where exceedances of the air quality objectives are identified. The County Borough Council is then required to produce an AQAP to address the air quality within the area to reduce pollutant concentrations.

The Clean Air Plan for Wales<sup>13</sup> sets out Welsh Government's commitment and long-term ambition to improve air quality, and the steps it will take to deliver this. The Clean Air Plan brings together work across many Government departments and public bodies to take air pollutants from many sources, and will serve as a living document to secure clean air for current and future generations. It includes ambitions to meet and where possible exceed requirements set down in UK and international guidance and legislation. One of the key areas highlighted by the Clean Air Plan is the continued risk of exceedance of European ambient air limit PM<sub>10</sub> in Port Talbot.

Public bodies in Wales need to carry out air quality and noise management in accordance with the five ways of working set out in the Well-being of Future Generations (Wales) Act 2015 ("the WFG Act"). These are:

- looking to the long term so we do not compromise the ability of future generations to meet their own needs;
- taking an integrated approach;
- involving a diversity of the population in the decisions affecting them;
- working with others in a collaborative way to find shared sustainable solutions; and
- acting to prevent problems from occurring or getting worse.

This means policy integration and collaboration with partners is required beyond the scope of Local Authorities' functions under the Environment Act. The Welsh Government has also made population exposure to air pollution one of the national indicators under the WFG Act.

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<sup>13</sup> <https://www.gov.wales/clean-air-plan-wales-healthy-air-healthy-wales>

A Clean Air Act for Wales is a key commitment in the Clean Air Plan for Wales. A Clean Air Bill for Wales is scheduled to be introduced in year 2 of the Senedd term. In February 2023, a White Paper consultation on the Clean Air Bill for Wales<sup>14</sup> was published.

The Environment (Air Quality and Soundscapes) (Wales) Bill 2023<sup>15</sup> has been proposed, with the overarching aim to bring forward measures that will contribute to improvements in the quality of the air environment in Wales and reduce the impacts of air pollution on human health, biodiversity, the natural environment and our economy. It proposes to:

- to provide a framework for setting national air quality targets;
- to amend existing legislation relating to the national air quality strategy; local air quality management; smoke control; clean air zones/low emission zones and vehicle idling;
- to place a duty on Welsh Ministers to promote awareness of air pollution; and
- to place a duty on Welsh Ministers to publish a national soundscape strategy.

The Bill is currently at Stage 1 consideration of the general principles of the Bill by a committee, and the agreement of those general principles by the Senedd. Further information about the bill can be found in the Explanatory Memorandum<sup>16</sup>.

### **3.2.1.1 Clean Air for Port Talbot: Short Term Action Plan<sup>17</sup>**

The Welsh Government (WG) are currently in the process of updating the Short Term Action Plan (STAP) 2012, a plan which describes the short term actions, over and above the day to day existing activities, that will be taken where there is a risk of exceedance of the PM<sub>10</sub> daily AQO. This plan is pursuant to the requirements

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<sup>14</sup> <https://www.gov.wales/sites/default/files/consultations/2023-02/summary-responses-white-paper-consultation-clean-air-bill.pdf>

<sup>15</sup> <https://senedd.wales/media/raap2wmh/pri-ld15738-e.pdf>

<sup>16</sup> <https://senedd.wales/media/gbhlcqfn/pri-ld15738-em-e.pdf>

<sup>17</sup> <https://www.gov.wales/clean-air-port-talbot-short-term-action-plan-2012>

imposed on the Welsh Ministers by regulation 11 of the Air Quality Standards (Wales) Regulations 2007.

The STAP is implemented through a collaborative approach, including:

- Steering Group, meeting three times a year, with the purpose of reviewing ongoing work and directing resources appropriately.
- Regulators Group, meeting three times a year, tasked with reviewing the actions being taken by the regulators and Welsh Government in Port Talbot.
- Data Team, meeting monthly, tasked with reviewing the data on PM<sub>10</sub> and improving the management and interpretation of the data across the different organisations.

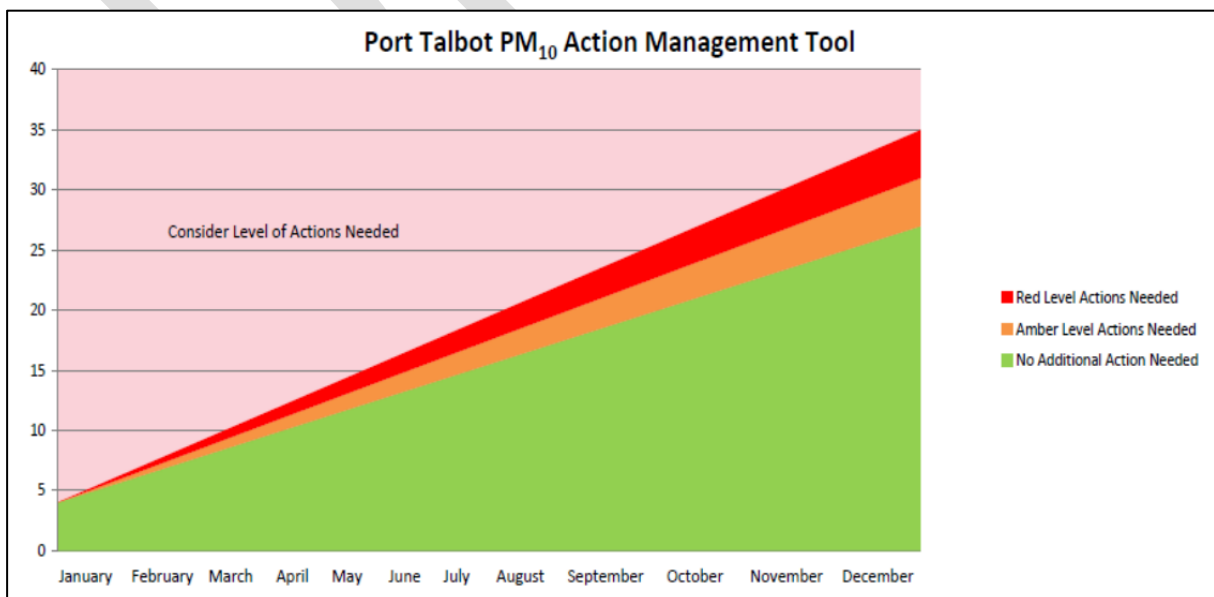
The terms of reference for the groups have been drawn up with input from the Environment Agency Wales (now part of Natural Resources Wales), NPTCBC, Harsco, Tarmac and Tata Steel UK.

The appropriate intervention time for these actions is decided following a model, developed by the Environment Agency Wales (now part of Natural Resources Wales) Technical Specialist and based on historical data trends. The model compares the number of breach days relative to the current position within the calendar year, and indicates whether the number of breach days is disproportionately high. For example, a total of 20 breaches within the first six months of a year would be of great concern, and would trigger more stringent interventions, than reaching a total of 20 breaches by December.

**Figure 3-2 Escalation model for STAP action – four indicators of required actions**

- Green – the number of breaches is low for the current point in the year and the existing wide ranging control measures are effectively minimising PM<sub>10</sub> emissions.
- Amber – the number of breaches is approaching a high level relative to the current point in the year, therefore, additional interventions would be initiated and preparations would be made by the relevant organisations to minimise the risk of reaching the red area.
- Red – the current rate of breaches has the potential to reach 35 by the end of the calendar year, therefore the Welsh Government would call a meeting of the relevant organisations to consider the initiation of the Short Term Actions. These Short Term Actions are designed to have an immediate effect to improve air quality.
- Pink – if at any point during the year the rate of breaches has the potential to exceed 35, consideration will be given to what additional measures should be initiated.

**Figure 3-3 Escalation model for STAP action – Action Management Tool, calendar months against number of year to data exceedances of the 50 µg/m<sup>3</sup> daily limit for PM<sub>10</sub>**



## 3.2.2 Local Context

### 3.2.2.1 Air Quality Strategy, “Air Wise - clean air for everyone”<sup>18</sup>

Neath Port Talbot’s Local Air Quality Strategy, “Air Wise - clean air for everyone”, sets out the Council’s strategic policy for achieving cleaner air in partnership with the whole community. It also links in with the Council’s aims and values and in particular with those relating to " Sustainable Communities and Environment" and “Prosperity for All," which includes improving air quality and regenerating the area’s physical and industrial environment. Originally developed in 2000 the strategy was most recently reviewed and updated in November 2013. The Council will consider whether or not this document should be reviewed when guidance relating to the new Environment (Air Quality and Soundscapes) (Wales) Act 2024 is published as it may change responsibilities on the Council in relation to Air Quality.

### 3.2.2.2 Local Development Plan<sup>19</sup>

NPT adopted the Local Development Plan (LDP) on 27th January 2016. It is currently being updated – see the Replacement Local Development Plan 2023-2038<sup>20</sup>.

The policies listed below are relevant to air quality:

- Strategic Policy SP2 – Health;
- Strategic Policy SP16 – Environmental Protection;
- Policy EN8 – Pollution and Land Stability; and
- Policy EN9 – Developments in the Central Port Talbot Area.

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<sup>18</sup> <https://beta.npt.gov.uk/environmental-health/air-land-and-water-quality/npt-air-quality-strategy/>

<sup>19</sup> <https://www.npt.gov.uk/7328>

<sup>20</sup> <https://www.npt.gov.uk/29462>

Within the Review of the Local Development Plan<sup>21</sup> in July 2020, 18 key issues were identified, including air quality. The Review discusses the possibility of dividing Policy EN8 in the Replacement Local Development Plan, to provide separate policies for pollution and land stability, referring to areas having historic land stability issues.

### **3.2.2.3 Pollution Supplementing Planning Guidance (SPG) October 2016<sup>22</sup>**

The 'Pollution' SPG provides detailed information about pollution issues in NPT and sets out the relevant matters that will need to be taken into consideration when developments are being planned. While only policies in the LDP have special status in the determination of planning applications, the SPG will be taken into account as a material consideration in the decision-making process.

### **3.2.2.4 Environment Strategy 2008-2026<sup>23</sup>**

The Neath Port Talbot Environment Strategy was developed in partnership with the Neath Port Talbot Environment Forum.

Overarching objectives of the Strategy which directly or indirectly relate to air quality are:

- Minimise pollution
- Monitor and regulate impacts
- Adapt to climate change
- Increase energy and resource efficiency.

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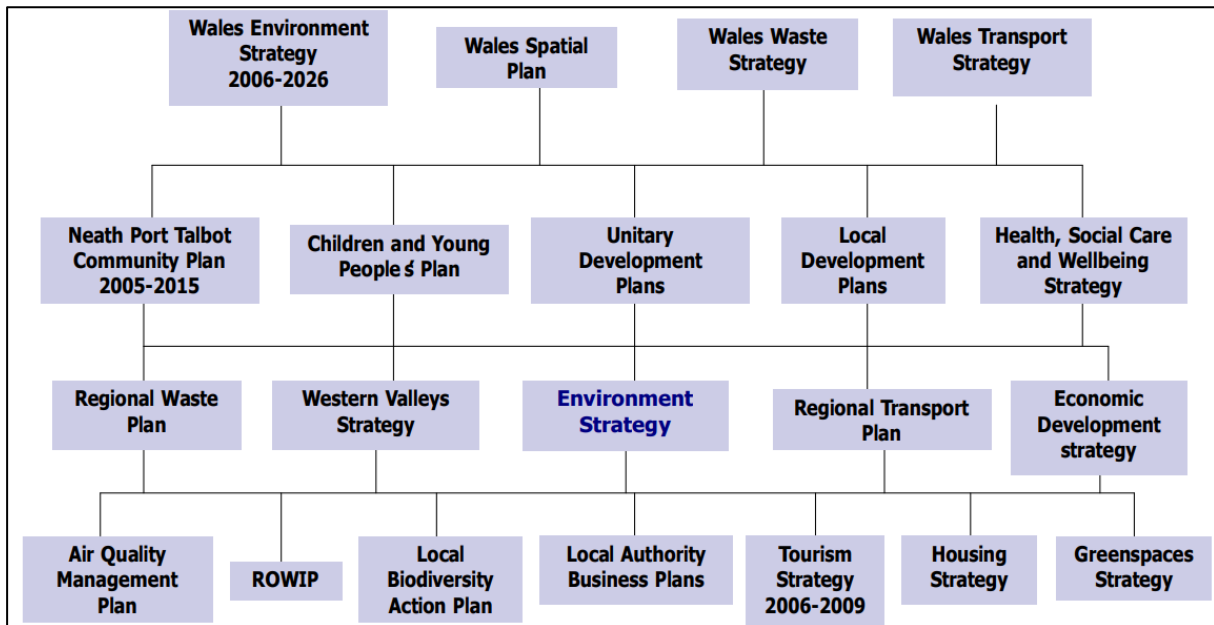
<sup>21</sup> <https://www.npt.gov.uk/media/13823/ldp-review-report-july-2020.pdf?v=20200709084011>

<sup>22</sup> [https://www.npt.gov.uk/media/7468/spg\\_pollution\\_oct16.pdf](https://www.npt.gov.uk/media/7468/spg_pollution_oct16.pdf)

<sup>23</sup> <https://www.npt.gov.uk/1518>



Figure 3-4 Appendix 2 of the Environment Strategy 2008:2026, demonstrating how it relates to other strategies and documents



### 3.2.2.5 Industrial Pollution Control<sup>24</sup>

The Council has the responsibility for regulating certain industrial activities under the Environmental Permitting Regulations 2016<sup>25</sup>. These regulations specify the types of operation which must apply for a permit. Most permits are "Part B" permits and only regulate emissions to air. But some permits are "A2" and regulate water pollution, land contamination, energy usage and accident prevention, although this tends only to be for a few of the larger industrial sites.

Natural Resources Wales (NRW) regulates the larger or more complex industries, which are known as "A1" installations.

All permitted activities in Neath Port Talbot with the potential to impact on air quality are subject to strict permit conditions regarding the emissions they may release, and must monitor, measure, and report actual emissions to the permitter (NRW or NPTCBC). Permits also require for incidence reporting, response actions to

<sup>24</sup> <https://www.npt.gov.uk/1501>

<sup>25</sup> <https://www.legislation.gov.uk/uksi/2010/675/contents/made>

incidents, and for staff members to be trained and informed on both routine and incident response processes regarding air quality and emissions.

In terms of annual measured PM<sub>10</sub> emissions, the largest permitted emitter is Tata Steel, who have a comprehensive Air Quality Management Plan in place, as well as an ongoing Dust reduction programme in coordination with Natural Resources Wales.

### 3.2.2.6 Decarbonisation and Renewable Energy (DARE) Strategy (May 2020) <sup>26</sup>, <sup>27</sup>, <sup>28</sup>

On 30th April 2019, the Welsh Government declared a climate emergency. The announcement drew attention in Wales to the magnitude and significance of the latest evidence on climate change.

The vision of the DARE is “To introduce a series of interventions and improvement measures across the County Borough to maximise the economic, social and environmental benefits and opportunities that the decarbonisation agenda provides.”

One of the key objectives is:

- “To reduce energy consumption or where reduction is not possible, to use fuel sources that are less harmful to the environment.”

Actions under DARE include upgrading of the council fleet, provision of electric vehicle charging infrastructure, a taxi licensing policy, active travel, creation of a Climate Change Working Group, and preparation of a 2030 Net Zero Action Plan.

These have co-benefits for improving air quality, and air quality is highlighted an important aspect of DARE.

Additionally, there are measures regarding energy efficiency of buildings and Sustainable Biofuels project to utilise waste gases from the Tata plant, which may impact on air quality.

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<sup>26</sup> <https://www.npt.gov.uk/23524>

<sup>27</sup> <https://www.npt.gov.uk/media/16358/dare-the-neath-port-talbot-decarbonisation-and-renewable-energy-strategy.pdf?v=20211207133732>

<sup>28</sup> <https://www.npt.gov.uk/media/13541/dare-strategy-may-20.pdf?v=20200522162830>

### 3.2.2.7 Joint Local Transport Plan 2015-2020<sup>29</sup>

The Regional Transport Plan is the result of joint working between the four local authorities (Carmarthenshire, Neath Port Talbot, Swansea and Pembrokeshire) in south west Wales. Its purpose is to shape transport policy in the region for the period 2015-2020 and beyond, as well as acting as a bidding document for major transport schemes.

### 3.2.2.8 Green Infrastructure

Green Infrastructure is considered a priority action area for Port Talbot for its many varied and important benefits. One of many benefits of green infrastructure is its potential to mitigate air quality. Discussions are taking place regarding collaborative projects to pilot Green Infrastructure interventions at air quality hotspots in Neath Port Talbot.

## 3.3 Source Apportionment

### 3.3.1 Source apportionment using Defra background maps

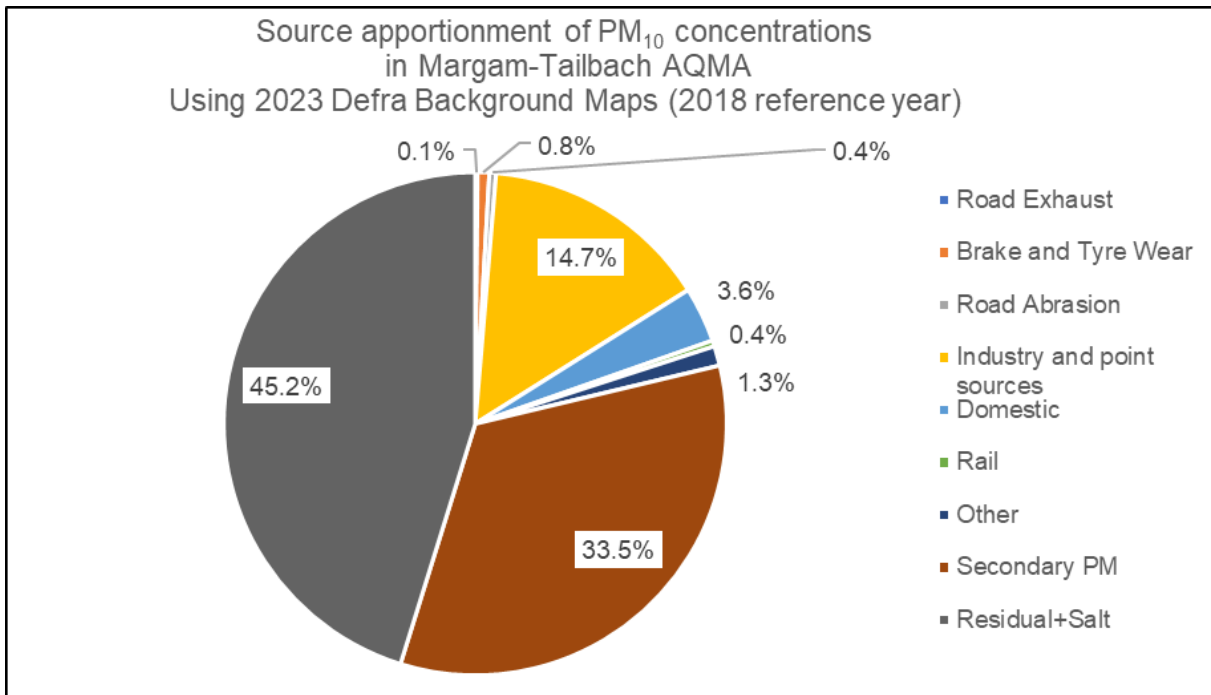
A source apportionment exercise was carried out for PM<sub>10</sub> using Defra background maps for 2023 (based on the reference year 2018) and industrial point source PM<sub>10</sub> emissions from the National Atmospheric Emissions Inventory (NAEI), for the latest available year (2021).

The Defra background maps provide estimates for pollutant concentrations across the UK at a 1km-by-1km resolution. These are derived from national air quality modelling, also known as pollution climate mapping (PCM), which itself is based on the NAEI. The source apportionment of PM<sub>10</sub> concentrations in the Taibach Margam AQMA based on the background maps is presented in Figure 3-5.

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<sup>29</sup> <https://www.npt.gov.uk/1461>

**Figure 3-5 Source apportionment of PM<sub>10</sub> in the Neath Port Talbot Taibach Margam AQMA using Defra Background Maps for 2023 (reference year 2018).**



“Residual+Salt” includes “PM\_ Secondary” includes Sea salt, calcium and iron rich dusts and regional primary PM and residual non-characterised sources (residual is PM with a diameter of less than 1 µg/m<sup>3</sup>). “PM\_ Secondary” or secondary PM (inorganic and organic), is formed through interaction of other pollutants in the atmosphere. Whilst these source categories comprise the significant majority (79%) of annual PM<sub>10</sub> concentrations in the AQMA, these sources of PM are outside of NPTCBC’s control.

Industry represents the next largest source of annual PM<sub>10</sub> concentrations in the AQMA (comprising 14.7%), and source apportionment presented in sections 3.3.2 and 3.3.3 point to industry sources as frequently being contributors to sources of peaks in PM<sub>10</sub> concentrations which result in breaches of the daily PM<sub>10</sub> concentration limit.

Domestic and road transport related sources also contribute to annual mean PM<sub>10</sub> concentrations in the AQMA.

### 3.3.2 NAEI point source emissions data

A breakdown of estimated emissions by industrial point sources in Neath Port Talbot is presented in Table 3-1 and Figure 3-6 . The highest contributor of PM10 emissions is Tata Steel (98.6%) with the highest contribution from the sinter (46%), followed by stockpiles (19%), oxygen furnaces (13%), blast furnaces (10%) and coke ovens (9%). This data has been obtained from the NAEI latest available (2021) list of industrial point sources<sup>30</sup>.

In early 2024 Tata Steel announced its plan to transform and restructure Port Talbot Steelworks. Tata’s proposals included the closure of the blast furnaces and coke ovens in a phased manner, with the first blast furnace closing around mid-2024 and the remaining heavy end assets winding down during the second half of 2024. The proposal also included the closure of the Continuous Annealing Processing Line (CAPL) in March 2025.

Under the transformation plan, Tata Steel propose to install Electric Arc Furnace technology in Port Talbot which hopes to reduce Tata Steel UK’s CO<sub>2</sub> emissions by 5 million tonnes per year equivalent to about 1.5% of UK emissions.

Discussions regarding the proposal continue, however, if the plan proceeds there is no doubt that we will see significant changes in air quality in the area during the timeline of this Air Quality Action Plan, which will be closely monitored and assessed by the Steering Group.

**Table 3-1 NAEI point sources in Neath Port Talbot of PM<sub>10</sub> emissions (in 2021)**

Operator	Sector	Plant ID	Site	2021 PM <sub>10</sub> Emissions (tonnes)	Min. distance from AQMA (km)
Tata Steel Ltd	Iron & steel industries	40537	Port Talbot Sinter	789.85	1.05
		40541	Port Talbot Stockpiles	330.00	1.35
		40539	Port Talbot Oxygen Furnaces	231.13	0.92

<sup>30</sup> <https://naei.beis.gov.uk/data/map-large-source>

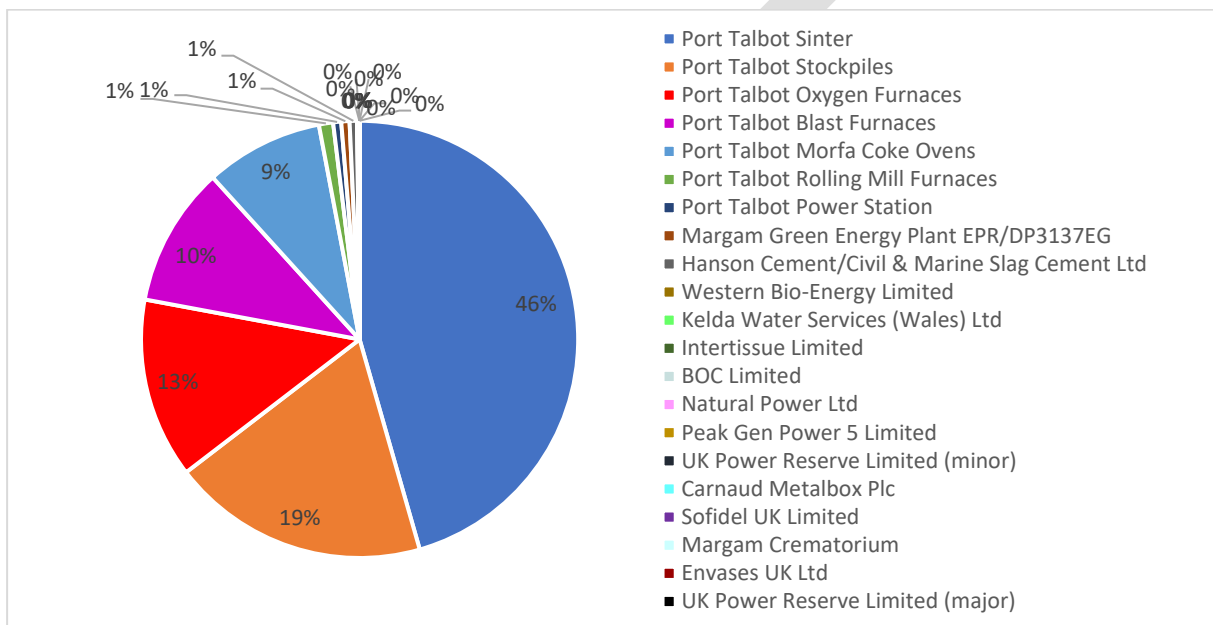
## Neath Port Talbot County Borough Council

Operator	Sector	Plant ID	Site	2021 PM <sub>10</sub> Emissions (tonnes)	Min. distance from AQMA (km)
		40538	Port Talbot Blast Furnaces	179.46	0.61
		40540	Port Talbot Morfa Coke Ovens	151.43	1.71
		40543	Port Talbot Rolling Mill Furnaces	18.23	0.21
		40542	Port Talbot Power Station	10.27	0.34
Margam Green Energy Plant EPR/DP3137 EG	Waste collection, treatment & disposal	9872	Margam Green Energy Plant Land off Longlands Lane, Neath Port Talbot	10.61	0.47
Hanson Cement/Civil & Marine Slag Cement Ltd	Cement	4923	Port Talbot	9.63	0.36
Western Bio-Energy Limited	Minor power producers	12144	Margam	0.47	0.68
Kelda Water Services (Wales) Ltd	Water & sewerage	11839	Afan WWTW	0.99	0.36
Intertissue Limited	Paper, printing & publishing industries	7565	Port Talbot	0.47	4.6
BOC Limited	Chemical industry	12725	Port Talbot	0.30	0.80
Natural Power Ltd	Waste collection, treatment & disposal	6763	Briton Power	0.15	5.87
Peak Gen Power 5 Limited	Minor power producers	14449	Llandarcy*	0.14	7.87
UK Power Reserve Limited	Minor power producers	40535	Afan Way Power Station	0.14	1.17
Carnaud Metalbox Plc	Other industries	3276	Neath*	0.14	7.6
Sofidel UK Limited	Paper, printing & publishing industries	40536	Baglan	0.13	4.43
Margam Crematorium	Miscellaneous	3942	Margam	0.055	0.91
Envases UK Ltd	Other industries	3325	Port Talbot	0.055	2.39

Operator	Sector	Plant ID	Site	2021 PM <sub>10</sub> Emissions (tonnes)	Min. distance from AQMA (km)
UK Power Reserve Limited	Major power producers	13434	Bridgend*	0.007	7.44

\* Not assessed in further detail due to distance from AQMA

Figure 3-6 NAEI source apportionment 2021 (PM<sub>10</sub>)

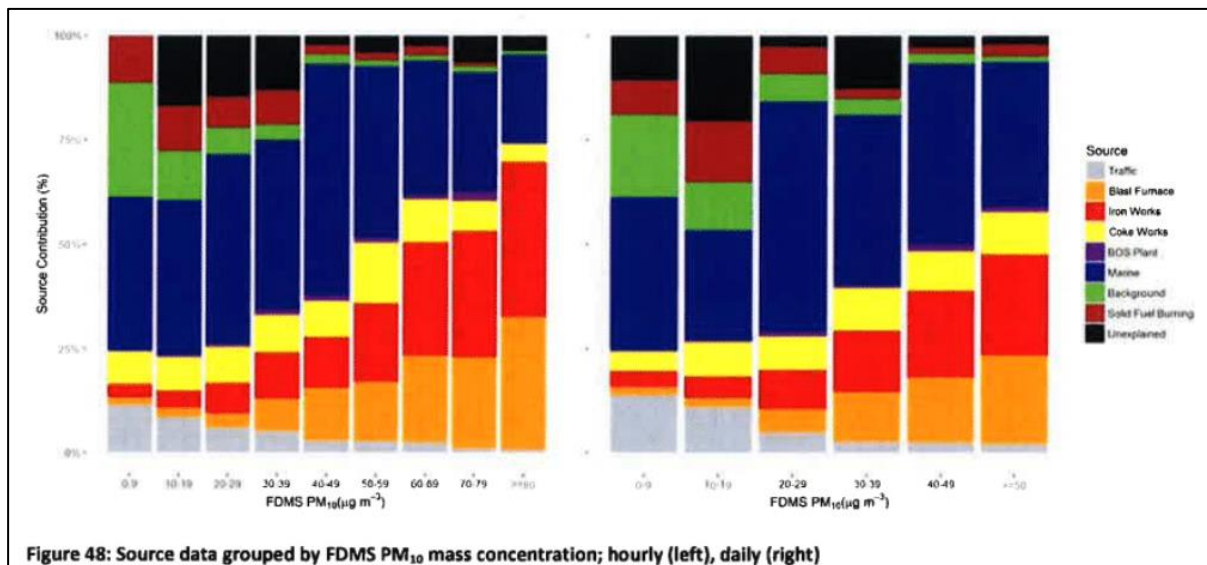


### 3.3.3 Previous source apportionment studies undertaken for Neath Port Talbot

It is important to acknowledge the difference in source apportionment of concentrations on different timescales.

Previous source apportionment carried out by Kings College in 2017 included analysis of hourly and daily PM<sub>10</sub> concentrations measured at the Margam AURN. These are presented in Figure 3-7, grouped by hourly (left) and daily (right) concentration bins.

**Figure 3-7 Source apportionment of PM<sub>10</sub> measured at the Margam AURN monitoring site, from the Kings College 2017 source apportionment study. Source key: grey = traffic, orange = blast furnace, red = iron works, yellow = coke works, purple = BOS plant, blue = marine, green = background, brown = solid fuel burning, black = unexplained.**



The graphs demonstrate that percentage contributions from the blast furnaces and the iron works increase with increased hourly and daily concentrations, and percentage contributions from solid fuel burning and traffic are greater at lower measured hourly and daily concentrations.

Their analysis of contributions of sources of peak PM<sub>10</sub> events concluded the following key points:

- Higher concentrations of PM<sub>10</sub> were dominated by either very strong winds from the west (associated with sea salt), or winds from the direction of the Steel complex.
- The largest source of PM<sub>10</sub> was marine – i.e., sea salt, comprising 33 – 48% of daily PM<sub>10</sub> mean concentrations. Elemental analysis of PM<sub>10</sub> has demonstrated chloride to be the main component, with average hourly concentrations of 5.3 µg/m<sup>3</sup> and maximum concentrations up to 20 µg/m<sup>3</sup> under westerly wind conditions.



- The relative contribution of the steel complex increased with concentration to make up 59-73% of PM<sub>10</sub> during elevated hourly concentrations (>60 µg/m<sup>3</sup>) and 57% of the daily mean concentrations greater than the 50 µg/m<sup>3</sup>.
- The iron making process with the chief contributor to elevated daily means, 25% from iron works and 22% from the blast furnace), with smaller contributions from the coke works (10%) and BOS plant (1%).
- Solid fuel burning contributed to 7% of PM<sub>10</sub> concentrations. This source is most dominant at low wind speeds and when wind speed directions are from the adjacent town. There is a strong association with temperature – concentrations from this source being higher in winter months, linked to domestic heating, and diurnal patterns show concentrations from this source increases in the evenings.

### 3.3.4 Source apportionment using measured concentrations and meteorological data for 2023

Measured concentrations from the Port Talbot Margam (PT4)<sup>31</sup> AURN Measurement site, as well as other WAQN measurement sites, can be used to support the findings from the modelled source apportionment (through Defra Background Maps and previous modelled source apportionment studies).

Data from Port Talbot Margam, Prince Street 2, Dyffryn School and Little Warren were analysed using the openair R package<sup>32</sup>. Measured meteorological data were used for Port Talbot Margam, gap-filled using modelled data from the Weather Research and Forecasting (WRF) model (see Appendix C for further details). For all other sites, WRF modelled meteorological data were employed.

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<sup>31</sup> Defra, 2023. [Site Information for Port Talbot Margam \(UKA00501\)](#).

<sup>32</sup> Carslaw, D.C., Ropkins, K., 2012. openair — An R package for air quality data analysis. Environmental Modelling & Software 27–28, 52–61. <https://doi.org/10.1016/j.envsoft.2011.09.008>

Analysis centred around “bivariate polar plots” to effectively illustrate the relationship between wind speed, wind direction and pollutant concentrations by plotting all three on a polar surface.

Figure 3-8 shows a bivariate polar plot of hourly PM<sub>10</sub> concentrations at the Margam AURN site in 2023. The highest concentrations highlighted in dark red, are exclusively found when wind is blowing from the South South West at all moderate-to-high wind speeds, from just over 5 m s<sup>-1</sup> to 15 m s<sup>-1</sup>.

**Figure 3-8 A bivariate polar plot showing the relationship between PM<sub>10</sub>, wind speed and wind direction.**

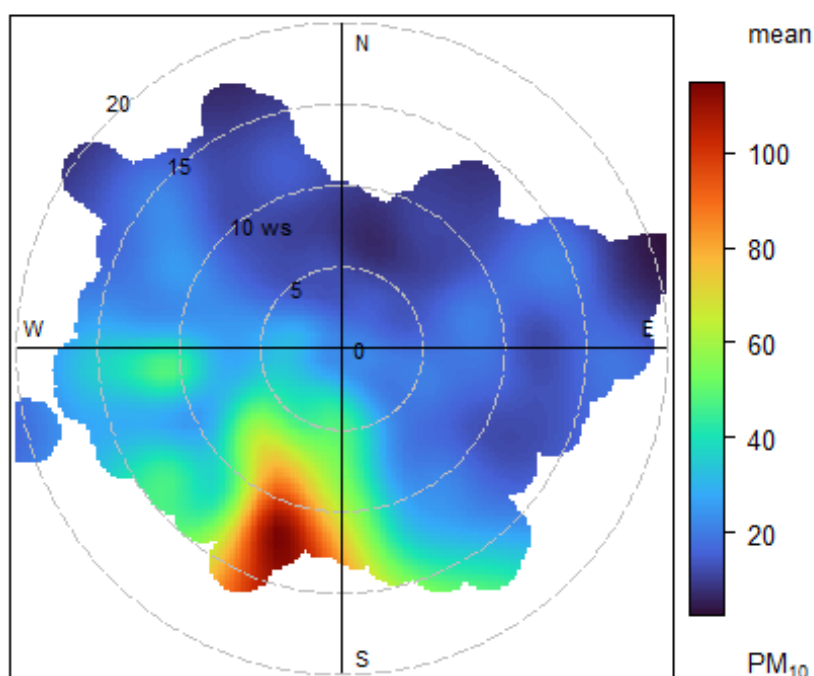
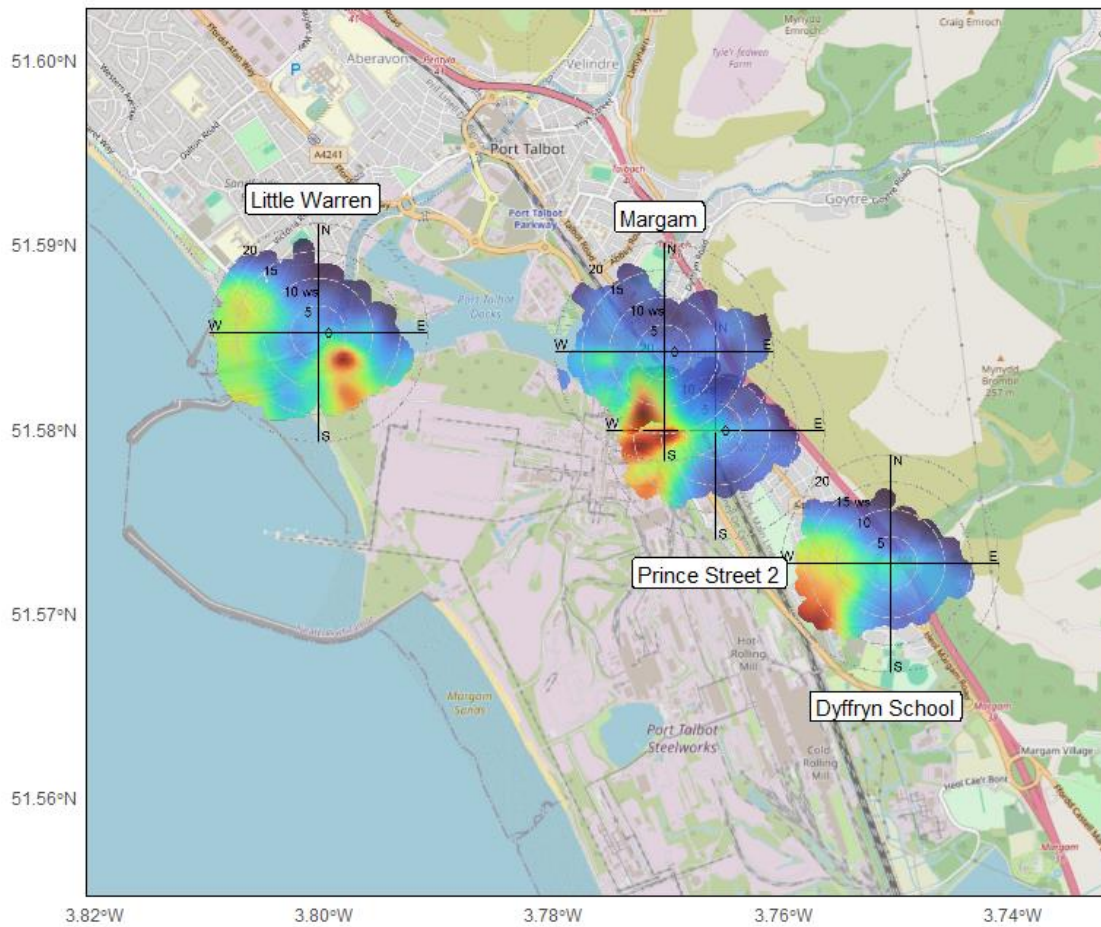


Figure 3-9 overlays bivariate polar plots from all four Port Talbot based measurement sites on a map. Each polar marker uses its own colour scale, which allows the greatest concentrations of PM<sub>10</sub> at each site to be clearly visible.

Figure 3-9 Polar plots of Neath Port Talbot PM<sub>10</sub> measurement sites overlaid on a map of Port Talbot. Map tiles by OpenStreetMap<sup>33</sup>.



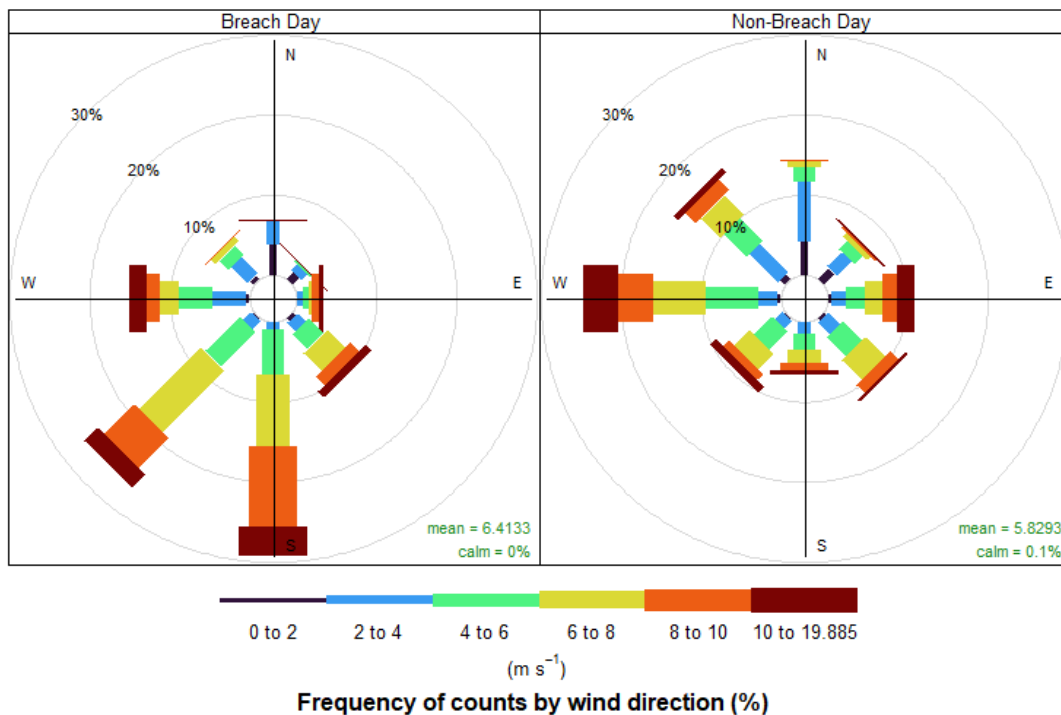
All four sites (Margam, Prince Street, Dyffryn School, Little Warren) show elevated concentrations of PM<sub>10</sub> when the wind blows from the direction of the steelworks, relative to the positions of the sites.

The dominant wind direction at Port Talbot Margam can be further examined in the context of Margam’s “breach days”, defined as days with a measured daily average of PM<sub>10</sub> greater than 50 µg m<sup>-3</sup>. As

Figure 3-10

<sup>33</sup>OpenStreetMap contributors, 2017. Planet dump retrieved from <https://planet.osm.org>.

Figure 3-10 A wind rose showing the dominant wind conditions on both breach and non-breach days at Port Talbot Margam.



Another way to examine measured pollutant concentrations is to calculate, visualise and compare the conditional probability function (CPF) of different pollutants. The CPF shows the probability of a concentration measured at a certain wind condition being above a certain percentile of all measured concentrations. More about the CPF can be read in the openair book<sup>34</sup>.

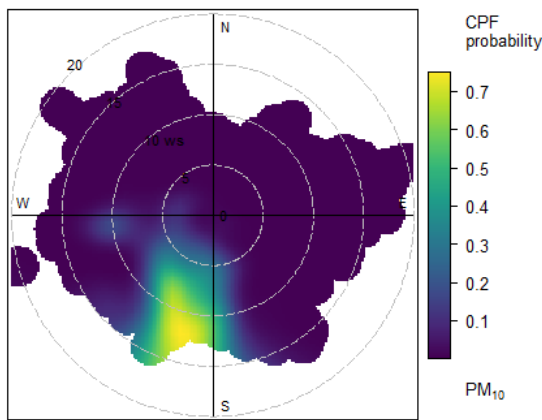
Figure 3-11 visualises the CPF for the 90<sup>th</sup> percentile of PM, NO<sub>x</sub> and SO<sub>2</sub> concentrations. Higher probabilities are plotted in a yellow-green colour and lower probabilities in a dark purple. It is clear that, for PM<sub>10</sub> and SO<sub>2</sub>, the highest percentile of concentrations result from south-westerly wind - the direction of the steelworks. This correlation between PM<sub>10</sub> and SO<sub>2</sub> likely suggests an industrial source of particulate matter.

<sup>34</sup> Carslaw, D., Davison, J., 2023. [The openair book](#).

Conversely, NO<sub>x</sub> appears to show elevated concentrations in calm conditions, suggestive of a local traffic source. There also appears to be a lighter feature corresponding to high winds coming from the West South West. This second feature may be illustrative of combustion activity at the northern end of the steelworks distinct from the source(s) of the highest percentiles of particulate matter.

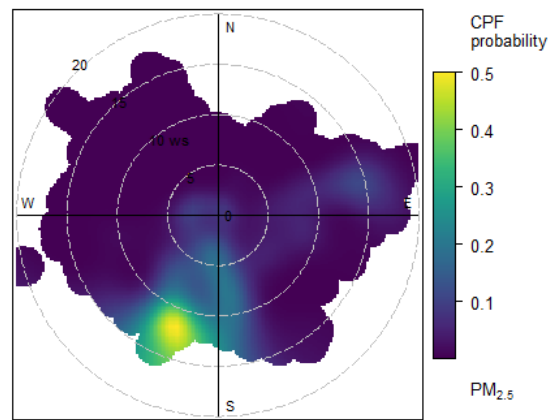
**Figure 3-11 Conditional Probability Function (90th Percentile) polar plots of PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub> and SO<sub>2</sub> at the Port Talbot Margam monitoring site.**

a) PM<sub>10</sub>



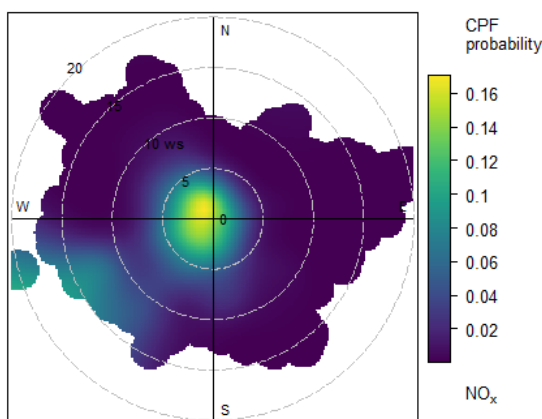
CPF at the 90th percentile (=53)

b) PM<sub>2.5</sub>



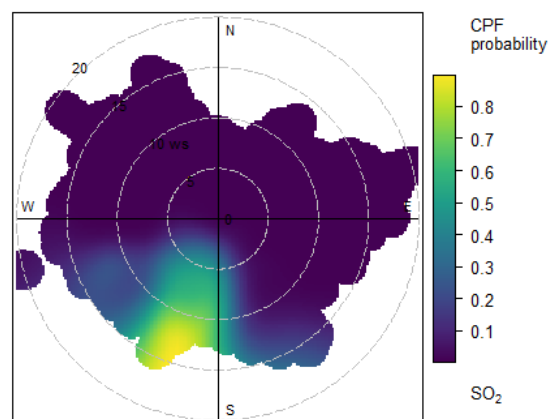
CPF at the 90th percentile (=17)

c) NO<sub>x</sub>



CPF at the 90th percentile (=30)

SO<sub>2</sub>



CPF at the 90th percentile (=4.8)

### 3.4 Key Priorities

Based on the current state of air quality in Neath Port Talbot, the public health and national and local policy context, and source apportionment of PM<sub>10</sub> emissions and concentrations, the following areas are prioritised for action:

- Priority 1 - Improve overall air quality across the borough.
- Priority 2 - Through collaborative working, ensure that wider strategic air quality action is implemented through existing policy areas.
- Priority 3 - Developing partnerships and public education.
- Priority 4 - Assess and manage PM<sub>2.5</sub> exposure.

#### **Priority 1 - Improve overall air quality across the borough**

This includes measures which seek to prevent and reduce emissions of pollutants from known sources.

Regarding PM<sub>10</sub>, the source apportionment presented in Section 3.3 demonstrates that the sources of PM<sub>10</sub> in the AQMA which are within control of NPTCBC are industrial, and to a lesser extent, domestic and road transport related. Measures have been selected for this AQAP which target these source areas, and in particular industrial measures, with responsible owners for industrial measures including NPTCBC, NRW, and the most significant three permitted industrial operators: Tata Steel, Hanson Cement, Margam Green Energy.

All industrial measures are long-term ongoing measures which continue to be implemented to monitor, control and prevent emissions from stack and fugitive sources. Examples include:

Measures targeting PM<sub>10</sub> from industrial, transport and domestic sources have co-benefits for other pollutants.

#### **Priority 2 - Through collaborative working, ensure that wider strategic air quality action is implemented through existing policy areas.**

This AQAP has been developed through collaboration across NPTCBC departments, with NRW and permitted industrial operators, and with other bodies including Public Health Wales, UKHSA, Swansea Bay University Health Board and Traffic Wales.

It considers and reinforces existing policies and measures in place which impact and seek to improve air quality in Port Talbot, considering air quality as a whole as well as individual pollutants.

NPTCBC consider it a priority to ensure collaborative working continues, and that air quality continues to be considered and managed through all relevant policy areas.

Examples of measures in the AQAP actions list (Table 5-1) which relate to this priority include:

### **Priority 3 - Developing partnerships and public education**

Public education and partnerships have been selected as a priority for this AQAP because it aligns with the objectives of The Environment (Air Quality and Soundscapes) (Wales) Act 2024. Public engagement is essential to the long term overall improvement in air quality, as we need to make the public aware of their role in air quality particularly with new controls on domestic burning proposed.

It is important that the general public are informed about the status of air quality in Neath Port Talbot (measure 36), and informed about what actions individuals can take which can help improve air quality (measures 21,23,39).

Developing partnerships is key due to the variety of benefits from these measures which will have benefits in terms of health and reduction of carbon emissions.

### **Priority 4 - Assess and manage PM<sub>2.5</sub> exposure**

PM<sub>2.5</sub> is of great importance from a human health perspective, because it represents the fraction of PM<sub>10</sub> which is smallest, and can result in the greatest health impacts due to the extent that it can travel through the human respiratory system. Monitoring of PM<sub>2.5</sub> in Neath Port Talbot demonstrates that this pollutant is well under the UK and EU annual mean target of 25 µg/m<sup>3</sup>. However, it is important to keep PM<sub>2.5</sub> under close review as a new PM<sub>2.5</sub> target will be set for Wales. NPTCBC are also aware that the PM<sub>2.5</sub> guideline from the World Health Organisation (WHO) is much stricter than the current target of 25 µg/m<sup>3</sup> (as of September 2021, the WHO guideline for annual mean PM<sub>2.5</sub> is 5 µg/m<sup>3</sup>).

As PM<sub>2.5</sub> is a component of PM<sub>10</sub>, the majority of measures which are targeting PM<sub>10</sub> in the AQAP will also have benefits in terms of reduction of PM<sub>2.5</sub>. For example:

Measure 34 - Homes as Power Stations - delivery of smart, low carbon energy efficient homes through new build developments, retro-fitting existing buildings, and local supply chain support development

Measure 38 - Investigate the development of a solid fuel and/or bonfire policy, once new legislation (Environment (Air Quality and Soundscapes)(Wales) Act 2024) is in place, and updated guidance or requirements are in place

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## 4 Development and Implementation of NPTCBC’s AQAP

### 4.1 Consultation and Stakeholder Engagement

**TO BE COMPLETED FOLLOWING FORMAL CONSULTATION**

The response to our consultation stakeholder engagement is given in Appendix A: Response to Consultation.

**Table 4-1 Consultation Undertaken**

Consultee	Consultation Undertaken

### 4.2 Steering Group

#### Steering Group Members

The Steering Group comprised of members from the Council, from national bodies, and from local businesses operating under environmental permits.

Members from the Council included the following departments: Environmental Health, Planning, Active Travel, Highways, City Deal and Low Carbon Growth and Transport teams.

National bodies involved in the Steering Group were: Natural Resources Wales, Public Health Wales, South Wales Trunk Road Agent, UK Health Security Agency.

Local industrial operators involved in the Steering Group included: Tata Steel, Hanson Cement, Green Energy Margam Ltd, Darlow Lloyd & Sons Ltd, Harsco

## Neath Port Talbot County Borough Council

Environmental, Runtech Ltd, BOC Ltd Margam Gases, Tarmac Trading Ltd and Western Bio-Energy Ltd.

Name	Organisation
Leah Morgan	NPTCBC Environmental Health
Celvin Davies	NPTCBC Environmental Health
Michael Roosmalen	NPTCBC Environmental Health
Gareth Liley	NPTCBC Environmental Health
David Morris	NPTC Planning Policy Officer
Laura Pack	NPTCBC Active Travel
Amber Horton	Public Health Wales
Claire Fauvel	Swansea Bay University Health Board
Rhodri Morgan	Natural Resources Wales (NRW)
Gary Evans	NRW Air Quality Advisor
Richard Jones	South Wales Trunk Road Agent (Traffic Wales)
Steve Owen	NPTCBC Council Highways
Daniel Rees	NPTCBC Lighting and Buildings Services Manager
Tom Hunt	Hanson Cement, Production Manager
James Davis	Darlow Lloyd & Sons Ltd, Environmental Manager
Paul Callow	UKHSA, Environmental Public Health Scientist
Nathan Ace	Tata Steel UK Limited (Port Talbot)
Peter Quinn	Tata Steel UK Limited (Port Talbot)

## Neath Port Talbot County Borough Council

Neil Haines	Tata Steel UK Limited (Port Talbot)
Paul Morgan	Harsco Environmental, Environmental Health and Safety Manager for South Wales
Paul North	Environment Manager, Runtech Ttd
Jonathan Batt	BOC Ltd Margam Gases
Paul Fitzsimmons	Margam Green Energy Limited, General Manager
Rachel Jordan	NPTCBC Planning Policy
Rebecca Sharp	NPTCBC Planning Policy - Countryside
Chris Davies	NPTCBC Planning Development
Nicola Lake	NPTCBC Planning Development
Brendan Griffiths	NPTCBC Transport
Huw Brunt	Public Health Wales
Hannah Morgan	Public Health Wales
Hayley Beharrell	Swansea Bay University Health Board
Marc Davies	Swansea Bay University Health Board
Paul Gibson	NRW
Brett Suddel	City Deal and Low Carbon Growth
Warren Scott	Hanson Cement
Ricky Guest	Tarmac Trading Limited
Scott Jenkins	Runtech Ltd
Simon Thomas	Western Bio-Energy Ltd

## **Steering Group Activities**

The Steering Group were provided information about the AQAP process and the role of the Steering Group upon their invitation to the group.

Steering Group were invited by email to provide suggestions for measures for the AQAP measures longlist, for consideration at first Steering Group workshop.

### Steering Group Workshop 20<sup>th</sup> July 2023

An online workshop was held for the Steering Group to provide an overview of the AQAP process, of the current air quality situation in Neath Port Talbot, and to discuss the longlist of AQAP measures. This included discussion of measures which had been compiled from existing policies, and how these could be improved or build upon, in addition to discussion of “new thinking” measures.

The workshop was well attended by most invited council departments and external organisations. Steering Group members also had the opportunity to raise questions, provide points of information and give feedback using the Teams chatbox within the meeting, and by email following the workshop. Condensed minutes from the workshop are provided in Appendix D.

### Draft AQAP and measures shortlist

Following the workshop, the measures longlist was refined to the shortlist based on feedback received within the workshop, and follow-up emails and video calls were held with relevant Steering Group members to further discuss opportunities to go further.

Measures which were included in the longlist but not taken forward to the shortlist are included in Appendix B, with the reason why the measure wasn't pursued, including specific feedback from the Steering Group where applicable.

The AQAP was drafted and circulated to the Steering Group.

### Monitoring and Evaluation of the AQAP, and maintenance as a “live strategy”

The Steering Group will continue to meet throughout implementation of the AQAP between 2024 and 2029. At minimum, Steering Group meetings will be held on an annual basis. Responsible owners of actions, including departments within NPTCBC

and external partners will report on the progress to date of actions, including reporting against KPIs, and raising any barriers or delays to implementation and/or completion of measures.

If the annual review reveals evidence that unforeseen barriers to progress have arisen, or measures are no longer suitable, the AQAP should be updated to reflect NPTCBC's position.

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## 5 AQAP Measures

Table 5-1 shows the NPT AQAP measures. It contains:

- a list of the actions that form part of the plan
- the responsible individual and departments/organisations who will deliver this action
- estimated cost of implementing each action (overall cost and cost to the local authority)
- expected benefit in terms of pollutant emission and/or concentration reduction
  - “High” – measures which directly abate or remove key sources of emissions, either permanently or temporarily during high-risk conditions.
  - “Medium” – measures which directly or indirectly achieve a quantifiable reduction in emissions.
  - “Low” – measures which are likely to have a positive but unquantifiable impact on air quality. Effectiveness of such measures may be constrained by engagement or enforcement. This can include “soft actions” such as knowledge sharing or gathering actions to inform on air quality and measures.
- the timescale for implementation
  - It is important to note that the nature of many of these measures – particularly those addressing industrial emissions, are long term ongoing measures. This means it is difficult to define and/or trace back the measure start year, and the measure is anticipated to be ongoing for the foreseeable future.
- how progress will be monitored

**NB:** Please see future APRs for regular annual updates on implementation of these measures.

### 5.1 Priority actions

The actions which are considered greatest priority in this action plan to the Council are:

- Measure 1: Participation in Welsh Government led multi-agency actions to investigate PM10 exceedances including monthly meetings.
- Measure 3: Regulation of NPTCBC permitted activities to ensure all permits are fit for purpose.
- Measure 26: Deployment of electric buses as part of decarbonisation plan
- Measure 28: Electric Vehicle (EV) Charging Infrastructure - identify and seek external funding opportunities to enable the installation of infrastructure initially at strategic locations and then across the wider County Borough.
- Measure 30: Closing of the blast furnace to be replaced with electric arc furnace (responsible owner: Tata Steel).
- Measure 36: Annual meeting of AQAP Steering Group.

The closure of the blast furnace is expected to reduce PM<sub>10</sub> emissions by 176 tonnes. With the implementation of this measure and other priority measures, it is expected that NPT will achieve daily mean PM<sub>10</sub> compliance in the near future.

The key priorities for the Steering Group organisations who are responsible owners for actions in Table 5.1 are as follows:

- Measure 4 - Regulation of NRW permitted activities (responsible owner: NRW).
- Measure 6 - Tata Steel daily data interpretation (concentrations, weather forecasts etc.) and response actions to minimise emissions and prevent breach days (responsible owner: Tata Steel).
- Measure 11 - Hanson Cement daily data interpretation (concentrations, weather forecasts etc.) and response actions, including: use of yard sprays, dampening or sweeping of access roads (responsible owner: Hanson Cement).
- Measure 14 - Notification of incidents or accidents which may impact air quality and/or breach permit conditions (responsible owner: Green Energy Margam)
- Measure 23 - Minimise hill fires through education and arson reduction actions (responsible owner: MAWWFIRE)

Table 5-1 Air Quality Action Plan Measures

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra or Welsh AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
1	Participation in Welsh Government led multi-agency actions to investigate PM <sub>10</sub> exceedances including monthly meetings	Policy Guidance and Development Control	Regional Groups Co-ordinating programmes to develop Area wide Strategies to reduce emissions and improve air quality	Ongoing	Ongoing	Welsh Government, NPTCBC, NRW, industrial operators	Various	Yes	Fully funded	Not possible to estimate costs	Implementation	Low - No direct impact to air quality, rather knowledge sharing and actions to inform on air quality	Meetings, dissemination of data and research	Various investigations, most recently the king's college monitoring report	Lack of participation or engagement by stakeholders
2	Local Authority led engagement with local businesses regarding air quality management planning and investigating PM <sub>10</sub> exceedances	Environmental Permits	Other	Ongoing	Ongoing	NPTCBC, industrial operators	NPTCBC	Yes	Fully funded	Not possible to estimate costs	Implementation	Low - No direct impact to air quality, rather knowledge sharing and actions to inform on air quality	Number of engagements	Ongoing	Lack of participation or engagement by stakeholders
3	Regulation of NPTCBC permitted activities to ensure all permits are fit for purpose	Environmental Permits	Other	Ongoing	Ongoing	NPTCBC	NPTCBC	No	Fully funded	Not possible to estimate costs	Implementation	High: Direct reduction of emissions through regulation and enforcement of permit conditions	Compliance with permit conditions, measured emissions, activity logs	Ongoing action	Staff resourcing
4	Regulation of NRW permitted activities	Environmental Permits	Other	Ongoing	Ongoing	NRW	NRW	No	Fully funded	Not possible to estimate costs	Implementation	High: Direct reduction of emissions through regulation and enforcement of permit conditions	Compliance with permit conditions, measured emissions, activity logs	Ongoing action	Staff resourcing
5	Dust reduction programme at TATA site	Environmental Permits	Measures to reduce pollution through IPPC Permits going beyond BAT	Ongoing	Ongoing	NRW, Tata Steel	NRW, Tata Steel	No	Fully funded	Not possible to estimate costs	Implementation	High: Direct reduction of particulate emissions via NRW regulation	Implementation of improvement schemes, measured emissions data, monitored PM <sub>10</sub> concentrations, number of dust nuisance complaints	The dust reduction programme will continue for the foreseeable future. Various improvements, including replacement of electrostatic precipitators with more efficient bag filters at the sinter plant in 2021.	None



Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra or Welsh AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
6	Tata Steel daily data interpretation (concentrations, weather forecasts etc.) and response actions to minimise emissions and prevent breach days.	Environmental Permits	Other	Ongoing	Ongoing	Tata Steel, NRW	Tata Steel	No	Fully funded	Not possible to estimate costs	Implementation	High: Direct reduction of emissions through implementation of response actions during occurrences and potential occurrences of high concentrations.	Breach day reports are completed every time that the 50µg is exceeded to see if discrete sources or causes can be identified. Monthly Data meetings are held to discuss data and trends, logs of response actions	Ongoing action	None
7	Tata Steel incidence communication and response actions	Environmental Permits	Other	Ongoing	Ongoing	Tata Steel, NRW	Tata Steel	No	Fully funded	Not possible to estimate costs	Implementation	High: Direct reduction of emissions through implementation of response actions during occurrences and potential occurrences of high concentrations.	Data interpretation meetings, logs of response actions	Ongoing action	None
8	Tata Steel monitoring networks, including site boundary ambient monitoring, spot monitoring of point sources, stockpile monitoring and on-vehicle monitoring of haul roads	Environmental Permits	Other	Ongoing	Ongoing	Tata Steel, NRW	Tata Steel	No	Fully funded	Not possible to estimate costs	Implementation	Low - No direct impact to air quality, rather knowledge sharing and actions to inform on air quality	Data is reported to NRW for permit compliance	Ongoing action	None
9	Wheel washers - operational and sensor communication status of site wheel washers are reviewed and issues are actioned.	Environmental Permits	Other	Ongoing	Ongoing	Tata Steel, NRW	Tata Steel	No	Fully funded	Not possible to estimate costs	Implementation	Medium - Direct reduction of particulates from unpaved site roads	Up to date action logs	Ongoing action	None

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra or Welsh AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
10	Road management processes - water bowsers deployed if dry conditions, temperatures excess in 15oC, wind direction and observations. Deployment of bowsers is monitored each and weekend deployment requirements are monitored each Friday. Sweepers also utilised.	Environmental Permits	Other	Ongoing	Ongoing	Tata Steel, NRW	Tata Steel	No	Fully funded	Not possible to estimate costs	Implementation	Medium - Direct reduction of particulates from unpaved site roads	Up to date observation logs	Ongoing action	None
11	Hanson Cement daily data interpretation (concentrations, weather forecasts etc.) and response actions, including: use of yard sprays, dampening or sweeping of access roads.	Environmental Permits	Other	Ongoing	Ongoing	Hanson Cement, NPTCBC	Hanson Cement	No	Fully funded	Not possible to estimate costs	Implementation	High: Direct reduction of emissions through implementation of response actions during occurrences and potential occurrences of high concentrations.	Data interpretation meetings, logs of response actions	Ongoing action	None
12	Hanson Cement staff training and awareness of permit conditions, operational practices and procedures for breach days and accidental emissions	Environmental Permits	Other	Ongoing	Ongoing	Hanson Cement, NPTCBC	Hanson Cement	No	Fully funded	Not possible to estimate costs	Implementation	Low - No direct impact to air quality, rather knowledge sharing and actions to inform on air quality	Number of staff trained	Ongoing action	None
13	Air quality improvement programme: a study to determine the extent to which systems to minimise NOx emissions can be optimised, to reduce NOx emissions as far as possible without increasing emissions of other pollutants. Additionally, a programme of dioxin monitoring and of mercury monitoring.	Environmental Permits	Other	Ongoing	Ongoing	Margam Crem	Margam Crem	No	Fully funded	Not possible to estimate costs	Implementation	Low - No direct impact to air quality at this point, rather knowledge gathering actions to inform on air quality	Complete research report with recommendations	Ongoing action	None

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra or Welsh AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
14	Notification of incidents or accidents which may impact air quality and/or breach permit conditions	Environmental Permits	Other	Ongoing	Ongoing	Green Energy Margam, NRW	Green Energy Margam	No	Fully funded	Not possible to estimate costs	Implementation	Low - No direct impact to air quality, rather knowledge sharing and actions to inform on air quality	Up to date notification log	Ongoing action	None
15	Planning policies to resist development on air quality ground where appropriate, through the Local Development Plan (LDP) 2011-2026 and the Replacement Local Development Plan (RLDP).	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	LDP: 2011 RLDP: 2021	LDP: 2026 RLDP: 2036	NPTCBC, Welsh Government	NPTCBC	No	Fully funded	Not possible to estimate costs	Implementation (LDP 2011-2026) Planning (RLDP 2021-2036)	Low - No reduction of existing emissions, rather, prevention of possible additional emissions	Number of planning applications reviewed	The LDP is in force. In terms of planning for the RLDP, a review of the LDP has been completed, and the review report is submitted to Welsh Government. An Integrated Sustainability Appraisal scoping report has been completed.	Lengthy timescale
16	Review and update air quality policies in the Replacement Local Development Plan	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2024	Unknown	NPTCBC	NPTCBC	No	Fully funded	Not possible to estimate costs	Planning	Low - No reduction of existing emissions, rather, prevention of possible additional emissions	Completion of review and update of air quality policies	RLDP is still in early stages of being updated.	Consultation delays
17	Travel plans	Promoting Travel Alternatives	Personalised Travel Planning	2024/2025	2025	NPTCBC	Welsh Gov / NPTCBC	No	Partly Funded	20K	Implementation By April 2025	Low - Direct but unquantifiable impact on reducing emissions.	Travel plan implemented	Part implemented but not complete	None
18	School active travel plans and educational activities	Promoting Travel Alternatives	School Travel Plans	2024/2025	2025	NPTCBC	Welsh Gov / NPTCBC	No	Partly Funded	20K	Implementation By April 2025	Low - Direct but unquantifiable impact on reducing emissions.	Number of plans in place, number of pupils walking/cycling to school	61 plans in place currently being updated to reflect the new Active Travel template	None
19	Delivery of cycle training and active travel education	Promoting Travel Alternatives	Promoting cycling, promoting walking	Ongoing	Ongoing	Road Safety Team Neath Port Talbot Council	Welsh Government & LA	No	Partially funded	50K-100K	Implementation	Low - Direct but unquantifiable impact on reducing emissions.	Number of training sessions conducted, Number of participants	Funding by Welsh Government is secured annually. The Road Safety Team at NPTC delivers cycle training to all ages and abilities by utilising funding from WG as well having our own Cycle Instructor funded internally. We also deliver pedestrian training for all ages and this again is funded by both WG and LA.	No barriers - training is sought after by public and schools and training goes on all year.

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra or Welsh AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
20	Improvements to active travel facilities, e.g cycle storage.	Promoting Travel Alternatives	Cycle network	Ongoing	Ongoing	Neath Port Talbot Council	WG Active Travel Fund	Yes	Applications for funding made annually	Site specific	Ongoing	Low - Direct but unquantifiable impact on reducing emissions.	Number of cycle infrastructure	<p>There has been installation of 3 cycle shelters in 2022/2023: Aberavon Shopping Centre, Aberavon Beach and Port Talbot Train Station.</p> <p>Cycle hoops also been installed in Cymmer near to the refreshment rooms, to replace cycle storage which had fallen into disrepair. To help encourage more people to cycle, Neath Port Talbot Council has launched a scheme whereby we are giving away up to four free cycle stands to organisations in locations where cycle parking is needed</p> <p>An interactive map has been created to show where cycle storage is available in NPT, the map will be placed on the councils webpage allowing residents or visitors to view photos and locations of the available cycle storage before travelling. In the past 2 financial years, a total of 11 new seats were installed in locations alongside cycle routes in the county borough.</p>	None
21	Provision of Active Travel information via NPTCBC website	Public Information	Via the Internet	Ongoing	Ongoing	Neath Port Talbot Council	WG Active Travel Fund	Yes	Applications for funding made annually	Estimated <£10K per year	Ongoing	Low - Direct but unquantifiable impact on reducing emissions.	Number of website visits	<p>The council launched it's new active travel webpage last year, which can be found here: <a href="http://www.npt.gov.uk/activetravel">www.npt.gov.uk/activetravel</a> this includes a link to NPT's Active Travel Network Maps. Further changes to the website are planned this financial year.</p>	None
22	Minimise industrial and commercial fires	Other	Other	Ongoing	Ongoing	NPTCBC, NRW, M&WWFIRE	NPT, NRW, M&WWFIRE	No	Fully funded	Not possible to estimate costs	Implementation	High - Direct reduction of emissions through preventative and remedial action	Number of complaints about industrial commercial fires investigated	No problems in recent years	None
23	Minimise hill fires through education and arson reduction actions.	Other	Other	Ongoing	Ongoing	MAWWFIRE	MAWWFIRE	No	Fully funded	Not possible to estimate costs	Implementation	High - Direct reduction of emissions through preventative and remedial action	Number of hill fires, estimated emissions from fires	Community fire safety team targets	None

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra or Welsh AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
24	Street sweeping carried out as required to remove particulates from the highway	Transport Planning and Infrastructure	Other	Ongoing	Ongoing	NPTCBC	NPTCBC	No	Fully funded	Not possible to estimate costs	Implementation	Medium - Direct reduction of particulates from the highway	Records of street sweeping activities	Sweeping has been carried out at TATA's request on several occasions	None
25	Improvements to public transport (buses)	Transport Planning and Infrastructure	Public transport improvements	2027	Unknown	WG, TfW, NPTCBC, Bus Operators	WG	No	Fully funded	Not possible to estimate costs	Planning	High: Direct reduction of particulate emissions	Number of buses retrofitted or improved	Bus Bill passed	Funding Cooperation from bus operators
26	Council Fleet / Plant - conduct an assessment of the suitability of new technologies that come onto the market to determine their viability for use as part of the Council's fleet of vehicles and plant	Promoting Low Emission Transport	Company Vehicle Procurement - Prioritising uptake of low emission vehicles	Ongoing	Ongoing	NPTCBC	NPTCBC	No	Fully funded	£1 million - £10 million	Planning	Low - No reduction of existing emissions, rather, prevention of possible additional emissions	Increase the number of Annual alternative fuelled vehicles within the Council's fleet. Increase the EV infrastructure at The Quays and other Council locations to allow for expansion of the ULEV fleet.	Planning phase	None
27	Electric Vehicle (EV) Charging Infrastructure - identify and seek external funding opportunities to enable the installation of infrastructure initially at strategic locations and then across the wider County Borough	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	2019	2025	NPTCBC	NPTCBC	No	Partially Funded	£1M-£10M	Planning - the NPT ZEVIS (Zero Emission Vehicle Infrastructure Strategy) adopted Nov '23 which identifies funding streams and Priority Focus	50,000 T CO2 400 T N2O (per year) Figures taken from NPT ZEVIS report	Number of EV charging points installed	EV infrastructure installed at 4 strategic locations across the wider County Borough	Barriers include Grid Capacity, Lead times for DNO Grid Connection, Planning/Highways considerations to on-street charging solutions, Procurement of commercial partners and equipment and resources to deliver outcomes within 12 month funding timeline

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											Areas leading to a Fast Track Programme				
28	Taxi licensing policy: in parallel with the emerging EV infrastructure, monitor/review the current policy to explore proposals to promote and encourage the take up of low emission taxis	Promoting Low Emission Transport	Taxi Licensing conditions	Ongoing	Ongoing	NPTCBC	NPTCBC	No	No funding available	Nil	Completed	Low - No reduction of existing emissions, rather, prevention of possible additional emissions	Measure the number of licensed low emission taxis and explore any incentives that could encourage the uptake of ULEVs	An amendment to the Taxi Licensing Policy was approved by the Registration and Licensing Committee in March 2023 following consultation with the hackney carriage and private hire trades.  The Taxi Licensing Policy requires that all new hackney carriage vehicles must be wheelchair accessible. This requirement has now been removed for fully Electric Vehicles.  To date, two fully electric vehicles have been licensed.	Fees for taxi licensing are calculated to recover as far as possible the actual costs of providing the service. Legislation dictates that the Council is not permitted to make a profit from the fees it charges.  Any incentives offered to increase the uptake of fully electric vehicles as taxis, would result in a decrease in income.
29	Sustainable Biofuels (Lanzatech Project) - assist in the delivery of a biofuel pilot project which will utilise waste gases from the TATA plant.	Promoting Low Emission Plant	Shift to installations using low emission fuels for stationary and mobile sources	Ongoing	Ongoing	NPTCBC, Welsh Government	Various	No	Fully funded	£10 million	Planning	Low - Direct but unquantifiable impact on reducing emissions.	Completion of pilot project	Letter in support in principle is provided to the company to facilitate funding applications. Funding is secured by the company. All necessary permissions are granted. The facility is constructed on schedule using local supply chains and becomes operational.	None
30	Closing of the coke ovens, blast furnace, sinter plant and other heavy end facilities to be replaced with electric arc furnace	Promoting Low Emission Plant	Shift to installations using low emission fuels for stationary and mobile sources	2024	Unknown	Tata Steel	Tata Steel, UK Government	No	Fully funded	£1.25 billion	Planning	High: Direct reduction of particulate emissions of 179.46 tonnes or approx. 10% of emissions of industrial point sources	Completion of project	Funding secured	None
31	Active Travel Network improvements	Transport Planning and Infrastructure	Cycle/walking network	Ongoing	Ongoing	NPTCBC	Active Travel Act Fund	Yes	Fully funded	£500K-1million	Planning / Implementation	Low - Direct but unquantifiable impact on reducing emissions.	Completion of projects	Sandfields Masterplan: We will develop detailed designs for three active travel routes in the Sandfields area.  Neath to Cimla: We will be creating a detailed design for the active travel route connecting Neath to Cimla.	None

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															<p>Neath Town Centre Masterplan: We will be developing outline designs for three routes within Neath Town Centre.</p> <p>Taibach to Goytre Links: Prepare an outline design for the active travel link between Taibach and Goytre.</p> <p>A48 Link to NCN47: Conduct a feasibility study to explore route improvements linking the A48 at Briton Ferry Roundabout to National Cycle Network Route 47 (NCN47) at Neath Canal.</p> <p>Accessibility Improvements: Implement dropped kerbs and tactile paving on five active travel routes, enhancing accessibility for all users, particularly those with mobility or visual impairments.</p> <p>Improvements to NCN4 Taibach: We will be undertaking route improvements at Margam Education Centre and installing lighting on the lane at the rear of Rhodfa Glan-y-Mor, improving safety and usability of the route and encouraging more active travel.</p> <p>Facilities Upgrades: Replace non-compliant barriers and moving signage which is obstructing NCN4 in Briton Ferry.</p> <p>Active Travel Network Map Development Map related facilities such as public seating, barriers, and crossings on existing routes. This mapping exercise will provide data to feed into planning and improving active travel infrastructure. An annual update of future and existing routes on DataMapWales will be undertaken in November 2024.</p> <p>Monitoring and Evaluation: Collect data to influence design and for ongoing monitoring and evaluation. Data collection will capture the speed and volume of vehicles, as well as the number of pedestrians and cyclists.</p>

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra or Welsh AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
32	Public rights of way network (PROW) improvements.	Planning and Engineering and Transport	Cycle/walking network	2021-2022	2022	NPTCBC	NPTCBC/WG	No	Completed	£100k - £500k	Completed	Low - Direct but unquantifiable impact on reducing emissions.	Planned schemes completed	Planned schemes include: Byway 49 (Glyncorrwg) - Nant Tewlaeth Footbridge Footpath 12 MST (Pelenna) Byway 111.PT (Cwmafan) Bridge on Byway 111 Footpath 93 Igk (Ystalyfera) Betting Colliery Footbridge. Footpath 18.0Hi (Nant y Cafn) – Nant y Cafn footbridge. Byway 9.0 Hi (Nant Melyn) Footpath 39 & 5 (Primrose Lane) Footbridge of Footpath 39. Footpath 106 Igk (Penrhiw Fawr) Replacement bridge. 50% contribution to be offered towards the cost of replacing the Bryndda Bridge on the boundary between NPT and Bridgend.	None
33	Homes as Power Stations - delivery of smart, low carbon energy efficient homes through new build developments, retro-fitting existing buildings, and local supply chain support development.	Promoting Low Emission Plant	Other measure for low emission fuels for stationary and mobile sources	Ongoing	Ongoing	NPTCBC	City Region Deal	No	SBCD – fully funded	£15m total	Implementation	Medium - project includes plans to directly reduce emissions from existing domestic heating sources.	Number of new build and annual refurbishment projects completed. Implementation of supply strategy for Haps. Development of skills and training programme for Haps.	Financial Incentives Fund has been launched supporting the development and implementation of creating cleaner, greener, more energy efficient homes.	Uptake by private individuals, cost
34	Air Quality Monitoring Pilot Study	Other	Other	2021	2023	NPTCBC, Swansea Bay City Deal (project 'Supporting Innovation and Low Carbon Growth')	Swansea Bay City Deal	No	Fully funded	£100k - £500k	Implementation	Low - No direct impact to air quality, rather a knowledge gathering action to improve air quality evidence base.	Monitoring data, increased understanding	2 year monitoring scheme nearing end, final QA/QC, reporting and source apportionment analysis to be completed.	Monitor downtime resulting in lack of data for a period of time - rare occurrence
35	New communication system for reporting hyperlocal air quality data and advice to public	Public information	Via the internet	2024	Ongoing	NPTCBC, Swansea Bay City Deal (project 'Supporting Innovation and Low Carbon Growth'), Vortex, Ricardo	Swansea Bay City Deal	Yes	Not obtained	£10k - £50k	Planning	Low - No direct impact to air quality, rather public knowledge increased	Public engagement via internet	Planning phase	Monitor downtime resulting in lack of data for a period of time - rare occurrence



Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra or Welsh AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
36	Annual meeting of AQAP Steering Group	Policy Guidance and Development Control	Other policy	2023	2028	AQAP Steering Group: NPTCBC,	Various	No	Fully funded	Not possible to estimate costs	Implementation	Low - No direct impact to air quality, rather an action to inform on and manage air quality	Annual meetings of AQAP Steering Group	Ongoing	Lack of participation or engagement by stakeholders
37	Investigate the development of a solid fuel and/or bonfire policy, once new legislation (Environment (Air Quality and Soundscapes)(Wales) Act 2024) is in place, and updated guidance or requirements are in place.	Policy Guidance and Development Control	Other policy	2024	Unknown	Local Authority Environmental Health, with input from Waste Teams	Welsh Government and NPTCBC	Yes	Not applied for funding as awaiting requirements of the Act	Not possible to estimate costs until requirement clearer	Planning	Low - unquantifiable reduction in emissions.	Up to date policy available on NPT website	Planning phase	None
38	Educational awareness campaign, covering domestic sources and what steps individuals can take to reduce their own air quality emissions.	Public Information	Leaflets, social media, school visits	2024	Ongoing	Local Authority Environmental Health,	Welsh Government LAQM Fund	Yes	Funding awarded	£10k	Planning	Low - Direct but unquantifiable impact on reducing emissions.	Number of training sessions conducted, Number of participants	Planning phase	None
39	Research into the extent, occurrence and source apportionment of fugitive emissions of PM and dust emissions in Port Talbot	Other	Other	2024	Ongoing	Local Authority Environmental Health, Tata, NRW	NPTCBC	No	N/A	£10k	Implementation	Low - No direct reduction in emissions, but source apportionment will be useful in identifying pollution episodes, forecasting and handling dust complaints.	Completion of research	Ongoing	None
40	Study into the M4 Port Talbot 50mph speed limit J41 to J42 - i.e. the consideration of measures along the M4 and trunk road network for nitrogen dioxide reduction	Traffic Management	Reduction of speed limits	2024	2025	Welsh Government	LAQM Fund	Yes	Funding awarded	<£10k	Planning / Implementation	Low - No direct reduction in emissions, but study will be useful in identifying measures that have direct emissions reduction.	Completion of research	Planning/Implementation phase	Whilst at present, the existing 50mph speed limit zone has been extended from J41 to J42, the Welsh Government has not ruled out further measures including the closure of slip roads.

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41	Hydrogen bus trials	Promoting Low Emission Transport	Other	2023	Ongoing	NPCBC, Swansea University, South Wales Transport, Hyppo Hydrogen solutions, Caetano Bus UK, Fuel Cell Systems, Protium, University of South Wales Hydrogen Centre	Various	Yes	Partial funding received	£250m	Planning	Low - No direct reduction in emissions, but will provide gateway for deployment of hydrogen bus fleet which has direct emissions reduction	Completion of trials with details of emissions reductions achieved.	Trials have commenced in Neath Port Talbot and Swansea in June 2023.	None

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## Appendix A: Response to Consultation

Table A.1 – Summary of Responses to Consultation and Stakeholder Engagement on the AQAP

TO BE COMPLETED FOLLOWING FORMAL CONSULTATION

Consultee	Category	Response

## Appendix B: Reasons for Not Pursuing Action Plan Measures

Table B.1 – Action Plan Measures Not Pursued and the Reasons for that Decision

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
Public information	Air Alerts	Feedback was that air alerts in some forms are prone to inciting panic and can result in unnecessary pressure on NHS and health services
Promoting Travel Alternatives	NPT Agile Working Scheme	Measure completed for NPTCBC staff - Agile home working policy in place.
Alternatives to private vehicle use	NPT car share scheme	Measure in place for NPTCBC staff. Considered to be too low impact in relation to the overall AQ issues in NPT, to warrant inclusion in the AQAP actions list, though agreement to highlight how NPT is leading by example in the main body of the AQAP.
Promoting Travel Alternatives	NPT bike to work scheme	Measure in place for NPTCBC staff. Considered to be too low impact in relation to

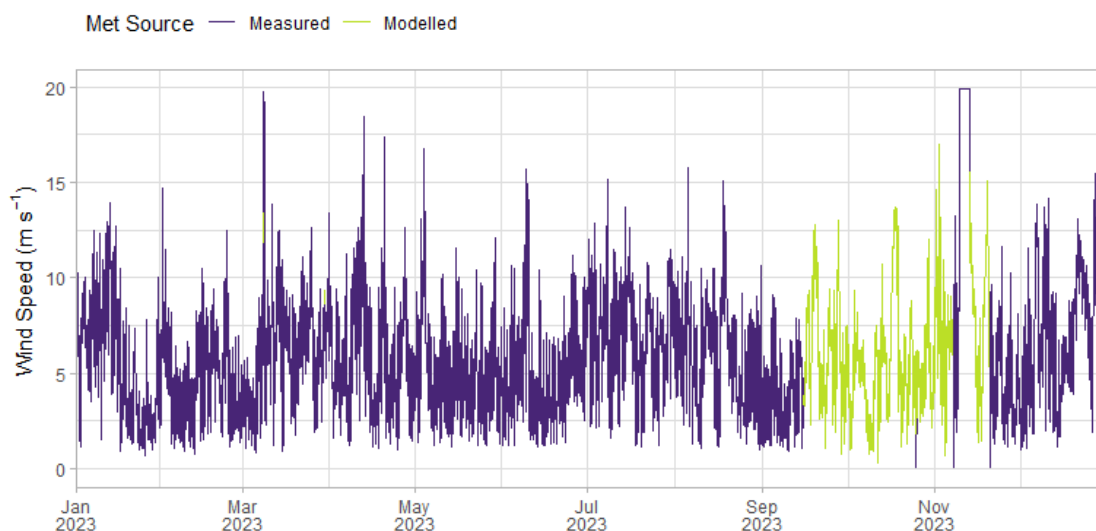
Action category	Action description	Reason action is not being pursued (including Stakeholder views)
		the overall AQ issues in NPT, to warrant inclusion in the AQAP actions list, though agreement to highlight how NPT is leading by example in the main body of the AQAP.
Other	Train haulage emissions: Investigate cases of visible mineral emissions from trains	Investigation of haulage emissions hasn't been required for years. Source apportionment has not shown emissions from trains to be significant. No further action is considered necessary, unless future monitoring and source apportionment indicates trains and haulage train emissions to be of concern.
Other	Provision of green waste recycling to minimise domestic bonfires	Measure is considered completed as green waste recycling service continues to be provided by the Council. Monitoring of this as an ongoing measure not considered useful, as it cannot provide information about the potential reduction of emissions from domestic waste fires.

## Appendix C: Source apportionment using measurement data: meteorological data sources and gap filling

Additional technical information supporting the source apportionment analysis using measurement data, as presented in Section 3.3.

The majority of the analysis of 2023 data has been undertaken using measured meteorological data from the Margam AURN monitoring site. However, due to technical issues with instruments not working, there was a period from mid September into November 2023 when measured meteorological was missing. This data was gapfilled using WRF modelled data, to allow for a full analysis of the calendar year measured PM<sub>10</sub> concentration data against wind speed and direction data. Figure C1 shows a timeseries of the origin of meteorological data for 2023.

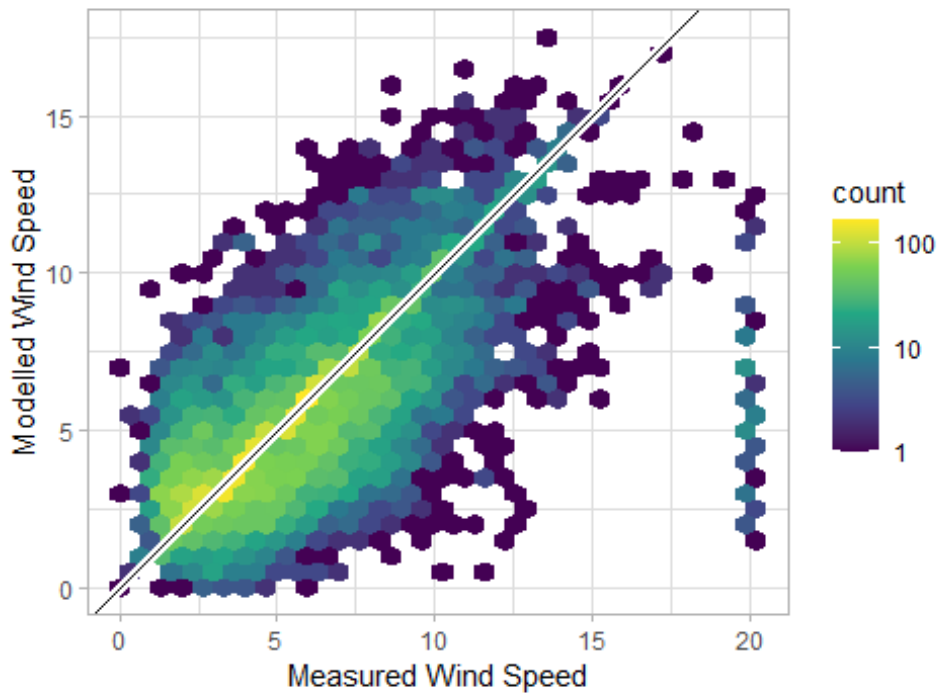
**Figure C1: A timeseries showing the origin of met data at the Port Talbot WAQN site**



Analysis was conducted to investigate the difference between the measured and modelled meteorological data. Figure C2 shows comparison plots between modelled and measured wind speed and direction.

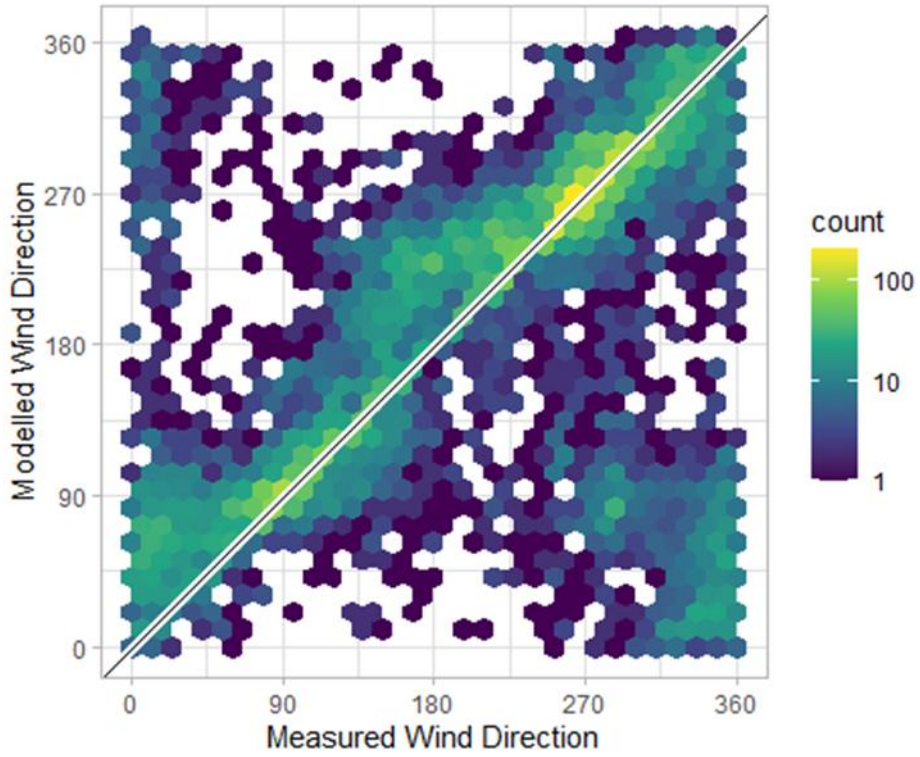
Figure C2: Hexagonally binned comparisons between measured and modelled wind speed and direction data at Port Talbot Margam

(a) Wind Speed



(b) Wind Direction





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## Appendix D: Minutes from NPT AQAP Steering Group Workshop

Date: 20 July 2023

Time: 14:00-16:00

### 1. Participants

Air quality consultants from Ricardo are supporting Neath Port Talbot County Borough Council (NPTCBC) in the update of their Air Quality Action Plan (AQAP) and are facilitating this workshop for the Steering Group. Ricardo Team: Abigail Pepler, Senior Air Quality Consultant; Sarah Foll, Principal Air Quality Consultant; Patrick Harland, Air Quality Consultant.

#### 1.1 Steering Group members in attendance

Name	Organisation
Leah Morgan	NPTCBC Environmental Health
Celvin Davies	NPTCBC Environmental Health
Michael Roosmalen	NPTCBC Environmental Health
David Morris	NPTC Planning Policy Officer
Laura Pack	NPTCBC Active Travel
Amber Horton	Public Health Wales
Claire Fauvel	Swansea Bay University Health Board
Rhodri Morgan	Natural Resources Wales (NRW)
Gary Evans	NRW Air Quality Advisor
Richard Jones	South Wales Trunk Road Agent (Strategic Road Network)

## Neath Port Talbot County Borough Council

Steve Owen	NPTCBC Council Highways
Daniel Rees	NPTCBC Lighting and Buildings Services Manager
Tom Hunt	Hanson Cement, Production Manager
James Davis	Darlow Lloyd & Sons Ltd, Environmental Manager
Paul Callow	UKHSA, Environmental Public Health Scientist
Nathan Ace	Tata Steel UK Limited (Port Talbot)
Peter Quinn	Tata Steel UK Limited (Port Talbot)
Neil Haines	Tata Steel UK Limited (Port Talbot)
Paul Morgan	Harsco Environmental, Environmental Health and Safety Manager for South Wales
Paul North	Environment Manager, Runtech Ttd
Jonathan Batt	BOC Ltd Margam Gases
Paul Fitzsimmons	Margam Green Energy Limited, General Manager

### 1.2 Steering group members unable to attend

Name	Organisation
Gareth Liley	NPTCBC Environmental Health
Rachel Jordan	NPTCBC Planning Policy
Rebecca Sharp	NPTCBC Planning Policy - Countryside
Chris Davies	NPTCBC Planning Development
Nicola Lake	NPTCBC Planning Development

Hannah Morgan	Public Health Wales
Hayley Beharrell	Swansea Bay University Health Board
Marc Davies	Swansea Bay University Health Board
Paul Gibson	NRW
Brett Suddel	City Deal and Low Carbon Growth
Warren Scott	Hanson Cement
Ricky Guest	Tarmac Trading Limited
Scott Jenkins	Runtech Ltd
Simon Thomas	Western Bio-Energy Ltd

**2. Introduction and Health Impacts of Air Pollution [Presented by Patrick Harland, Ricardo]**

- Provided an overview of the health impacts of poor air quality, highlighting health effects caused by PM in particular, and who in society is most vulnerable.
- Provided an overview of the pollutants of concern in Neath Port Talbot.

**2. Chat Box Discussion – Health Impacts of Air Pollution**

**[14:18] Amber Horton (Public Health Wales)**

Please note, mortality burden estimates quoted are not ‘actual deaths’ they are ‘attributable deaths’ – there are a lot of caveats with interpreting these.

**3. Project Background [Presented by Abigail Pepler, Ricardo and Patrick Harland, Ricardo]**

- Provided an overview of what the AQAP air quality action plan process should include and our approach to updating the plan for Neath Port Talbot.

### 3. Chat Box Discussion – Project Background

**[14:19] Nathan Ace (Tata Steel)**

Just a quick point of clarity, is the AQAP replacing the previous termed STAP?

**[14:20] Amber Horton (Public Health Wales)**

So, the AQAP has not been reviewed in the 5-year period as mentioned?

**[14:31] Leah Morgan (NPTCBC Environmental Health)**

No Nathan, the Air Quality Action Plan is separate to the STAP.

No Amber, the AQAP has not been updated in that timeframe.

- Provided an overview of the policy context at the national and local level.
- Provided an overview of the current state of air quality in Port Talbot.
- Provided an overview of sources of PM<sub>10</sub> in Neath Port Talbot, highlighting that the largest contributing source which is possible to control is industry, followed by domestic sources, then transport. (Residual and salt, and secondary PM are the greatest overall sources of PM<sub>10</sub> but not possible to control).
- Presented the AQAP Priorities proposed by the Council.

### 4. Measures Discussion

Feedback sought from the steering group on the ongoing measures gathered. Specifically, feedback on: any measures missed (ongoing, new or planned); measures no longer relevant; mitigation actions considered but abandoned; and feedback on the opportunities where the AQAP could build on existing measures or introduce further measures.

#### 4.1 Discussion – Measures to tackle Industrial Stack Emissions

**Amber Horton (Public Health Wales)** - Regarding the communication of air quality warnings to the public and the publicity campaign.

- We need to be mindful of public health messaging distributed.
- You don't want unintended consequences of the public rushing to hospitals and GP's as has happened previously. Due to NHS demands and pressures, proportionate messaging is needed.
- Example – if there is an air pollution episode, messaging needs to be carefully considered because we don't want to discourage, for example, active travel – it has benefits and can outweigh the negative health effects of exposure (with caveats). We need to be careful, it needs appropriate collaboration with partners
- We don't want people thinking to drive because it is not safe outside- that will make air quality worse, so it's about appropriate messaging.

**Celvin Davies (NPTCBC Environmental Health)** – Agrees with Amber on this point.

- The LA tried this a few years ago and it did have the effect of panic and increased use of health facilities.
- We had a text-message alert system previously.
- As a local authority we are seeing mixed communication and mixed messages
- When you look at the technical compliance we are reporting, we are not getting the breaches of PM<sub>10</sub> that the AQMA was originally set up to deal with. But there is a perception here in Port Talbot, that there is a higher pollution rate, I think some of this is around interpreting what the data is saying.
- Some of the public information does focus on air quality indexes. We'd be keen as a local authority to see how this could work. There are some apps that deal with this but don't compare the AQI to objectives.
- It won't go into the objectives part of it but gives a daily air quality index.
- There is a need to examine the difference between PM<sub>10</sub> and nuisance dust in the community as negative feedback around pollution focuses on this.
- The nuisance dust is causing more of a concern despite monitoring data showing PM<sub>10</sub> has been reduced over time.
- We are aware there are some emerging pollutants of concern such as PAHs.
- It is how we communicate we are doing well at reducing some pollutants but not all. The dust component may not have been a part of the original thinking of this AQAP.

**Sarah Foll (Ricardo)**

- Everything communicated needs a clear purpose and clarity.
- Regarding nuisance dust and PM<sub>10</sub> the difference of these pollutants may need to be communicated to the public.
- Generally when communicating messages about air pollutants it is important that the public know what these pollutants are before the communication.

**Abigail Pepler (Ricardo)**

- Question for Tata representatives about the potential for abatement through replacement of electrostatic precipitators. What's the status of this measure?

**Neil Haines (Tata Steel)**

- That was installed in summer 2021 and is in place.

**Abigail Pepler (Ricardo)**

- This will be reflected in the plan where we highlight work already done.
- Is there any thought on 5 day forecasting to help plan further ahead?

**Nathan Ace (Tata Steel)**

- We currently work off trend data to inform us when we are potentially approaching exceedance of PM<sub>10</sub>.

- We take action ceasing some operations or deploying additional abatement measures.
- It's the confidence of the forecasting that is in question. The forecasting would heavily impact our operations and therefore our financials. So, the accuracy would need to be at a good level.

**Abigail Pepler (Ricardo)**

- Could the extent to which the current air quality warnings are currently communicated go further? Can information be disseminated to help other industry operators or the councils so they can put in their reactive measures, if the daily forecast is looking poor?

**Nathan Ace (Tata Steel)**

- This could be an option, it's something we could look at by providing communication about what the PM<sub>10</sub> levels are looking like and when we'd take action.

**Celvin Davies (NPTCBC Environmental Health)**

- As a local authority we are keen to look at forecasting.
- We have got other monitors and sensors in the community so we would be keen to see if this new technology could help with forecasting.
- We would like to learn examples from the Scunthorpe situation, particularly setup.

**4.1.1 Chat Box Discussion – Industrial Measures (Stack Emissions)**

**[14:48] Amber Horton (Public Health Wales)**

We also don't want this to be in place of continuing to reduce air pollution levels. The main focus needs to be reducing the air pollution. Focus on prevention rather than reaction.

**[14:50] Paul Callow (UKHSA)**

Effects of an air pollution personal alert system on health service usage in a high-risk general population: a quasi-experimental study using linked data - <https://pubmed.ncbi.nlm.nih.gov/27217535/>

**4.2 Discussion – Industrial Measures (Fugitive Emissions)**

**Amber Horton (Public Health Wales)**

- Need to be mindful of suggested measure for increased concrete coverage, there can be flood risks from concrete.

**Claire Fauvel (Swansea Bay University Health Board)**

- Echoing Amber, the whole area is concrete and there is certainly a role in the nature recovery and greening agenda.
- There is a lot of technology out there that is low maintenance that abates impacts of poor air quality.
- No air pollution is good for our communities, the green infrastructure development could provide a lot of capital in terms of health and wellbeing and mitigation the health impacts of poor air quality.
- Neath Port Talbot have limited staff working in green infrastructure, they're looking for grant funding to take forward this work, if we could use the AQAP to help with this work.

**Abigail Pepler (Ricardo)**

- To explain, the increased concrete coverage suggestion is about unpaved roads within industrial complexes.

**Celvin Davies (NPTCBC Environmental Health)**

- I was going to return and say there is a specific action from Tata, about unpaved roads.
- With regards to fugitive emissions, from a local authority point, we have a good understanding what's happening with Tata and Hanson, due to them being regulated sites. It would be good to know what else is happening in the area.
- Some businesses on the call might not have any dust issues, it's worth us trying to capture this as a local authority to see what needs to be dealt with. If there is any fugitive dust or anything like that, we haven't captured, then we are supportive of coming down and having a look to see what's going on there.
- Also giving advice as a part of an action. As we only have Tata and Hanson captured in this plan historically, but there are other activities in the area .

**Abigail Pepler (Ricardo)**

- One of the difficulties when we are looking at industrial emissions, is the number of different people needed to be brought into the conversation.
- How do we want to capture the work that everybody is doing in the AQAP?
- Do we want to have actions in the AQAP that are broader, that encompass all the work that permitted sites need to do or do we want actions that are held as a responsible owner by each of the permitted organisations?
- It may be easier back to these questions at a later point.

**Celvin Davies (NPTCBC Environmental Health)**

- The point I was trying to raise it probably goes beyond permitted operations.
- We need to understand what is contributing to PM<sub>10</sub> and nuisance dust.
- We currently don't have any way of drilling down and understanding what's happening there.

- We are interested in creating an action around that and also, we would need input from businesses in that area who may be in this call .

**Abigail Pepler (Ricardo)** - In response to the chat box message from Paul

- Looking at source apportionment of stack vs fugitive emissions, I don't know how easy it will be to look at fugitive emissions specifically (unlike measured emissions from permitted point sources).

**Paul Callow (UKHSA)**

- It would be useful to know if there is a pollution inventory.
- The nature of the area is extremely well monitored for a UK site, so hopefully that will make the role a bit easier.
- It obviously gives an indication of where to concentrate efforts in the action plan.

**Abigail Pepler (Ricardo)**

- Potentially an action to consider in the AQAP a research exercise to better understand and register and attempt to quantify all the fugitive emissions in the area?

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#### 4.3 Discussion – Domestic Measures

**Amber Horton (Public Health Wales)** – Regarding domestic fuel policy

- Need to be mindful of unintended consequences of fuel poverty and where people are sourcing their fuel due to current economic and cost of living crisis.

**Paul Callow (UKHSA)**

- Worth reflecting decarbonisation agenda in action plan.
- Moving away from gas combustion for primary heating.
- Mindful of emerging evidence around eco-design stoves not being all its promised.
- May be smokeless but still a substantial source of PM<sub>2.5</sub> in urban areas.

**Abigail Pepler (Ricardo)**

- Is there an action to be taken to explore whether there is funding or grants that can be looked into addressing fuel poverty together with improving energy efficiency and the amount of carbon and particulates that are coming from domestic heating and fuel?
- Which branch of council would this come under?

**Paul Callow (UKHSA)**

- Who doesn't want lower cost heat with no pollution at point of use?

**Celvin Davies (NPTCBC Environmental Health)**

- I'm not sure if there's a particular section of council looking at this.
- We do have the decarbonisation section, who can be passed this question.
- As a part of the new Clean Air bill Wales (renamed) there is a part that looks at domestic burning, this suggests some measures and approved stoves and solid fuels .
- This would include moisture content of wood.
- There is a big piece of work around domestic emissions coming from primary legislation that's coming into Wales, it may be worth capturing that here.
- As a part of this process, there's impact assessment that need to be undertaken by Welsh government.
- The issue Amber rose about fuel poverty and Neath Port Talbot area has solid fuel appliances. These have been considered from a policy point of view. Welsh government can provide more information. The new legalisation will include this.

#### 4.3.1 Chat Box Discussion – Domestic Measures

**[15:13] Nathan Ace (Tata Steel)**

I believe log burning stoves etc was a point of discussion at a recent JCG meeting held – is this included?

**[15:18] Amber Horton (Public Health Wales)**

Again, to mention active travel and reducing car use comes under domestic. Linking with decarbonisation plans.

**[15:18] Leah Morgan (NPTCBC Environmental Health)**

Just to say that a representative from the decarbonisation team was invited but unable to attend today. They have asked to be kept in the loop and we will ask them this.

Yes Nathan, this will form part of this piece of work and is likely to be reviewed in light of the bill that Calvin just mentioned.

**4.4 Discussion – Transport Measures**

**Laura Pack (NPTCBC Active Travel)**

- The local cycling and walking infrastructure plan, will come under active travel network plans. This is already in place in Neath Port Talbot
- We have existing routes and future routes which are prioritised into short-, medium- and long-term.
- We have funding associated to that. So that infrastructure plan is already taking place.

**Amber Horton (Public Health Wales)**

- In terms of electric vehicles; big fleets and organisations moving to electric vehicles is a positive however, they are not the answer for everyone.
- In terms of general population, we need more of a modal shift to active travel, rather than incentivising people to change car use from petrol/diesel to electric vehicles.
- They're heavier, and they can do more damage in terms of road traffic collisions, tyre wear and therefore have the potential to increase PM.
- Modal shift interventions should include active travel and public transport considerations in the broadest possible sense.

**Sarah Foll (Ricardo)**

- Paul asked in the chat where would site mobile plant emissions come in. So, is that in regard to non-road mobile machinery type? That's usually covered under its own regulations.

- I think we consider those under industrial section, depending on what it is and what guidance it comes under. It's a good point to raise that we should think about that too.

**Abigail Pepler (Ricardo)**

- There is a section in the AQAP that will measures which have been completed, so, please do mention those to us for inclusion.
- Is anyone from transport on the line, if so, could you expand on what the planned improvements are to bus and rail?

**Laura Pack (NPTCBC Active Travel)**

- There are some actions happening regionally, but it might be worth including the passenger transport people into this meeting.

**Leah Morgan (NPTCBC Environmental Health)**

- They were invited but unable to attend.

**Abigail Pepler (Ricardo)**

- Can follow up with public transport officers over email.

**4.4.1 Chat Box Discussion – Transport Measures**

**[15:22] Paul Callow (UKHSA)**

Where would site mobile plant emissions come in? Fugitive industrial?

**[15:22] Richard Jones**

Environmental speed management area on the M4 which passes through this area.

**[15:22] Laura Pack (NPTCBC Active Travel)**

[www.npt.gov.uk/activetravel](http://www.npt.gov.uk/activetravel)

<https://mapdata.llyw.cymru/maps/active-travel-network-maps/>

**7. Discussion – Communication, Policy and Other Measures**

**Laura Pack (NPTCBC Active Travel)**

- We have funding to look at communications from an active travel perspective, whether we want to potentially link with air quality, just an idea.

- Maybe we could discuss further internally, it seems to link.

## 7. Chat Box Discussion – Communication, Policy and Other Measures

[15:29] Paul Callow (UKHSA)

With regard to Wildfires – NPT could join/link with Operation Dawn Glaw?

### 5. Next Steps

- Steering group members to feedback over email or phone call any measures missed or new measures planned that should be included in the AQAP.
- Ricardo to distribute workshop slides and meeting minutes.
- Ricardo will work with the council to explore any additional measures and refine long-list of measures to produce a short-list (by end of August 2023).
- Distribution of draft action plan to Steering group (end of September 2023).
- Consultation on draft action plan.
- Finalisation of action plan following consultation.

If there is anyone else who should be included to the Steering Group that wasn't invited, please advise so they can be contacted, and brought up to date.

## 6 Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQO	Air Quality Objective
AQS	Air Quality Strategy
APR	Air quality Annual Progress Report
B[a]P	Benzo[a]Pyrene, a pollutant belonging to the group polycyclic aromatic hydrocarbons (PAHs), formed during the combustion of fuels such as coal and oil at high temperatures. B[a]P is often used as a proxy for PAHs as a group, as it is considered to make the greatest contributions to the health risks caused by exposure to PAHs.
Defra	Department for Environment, Food and Rural Affairs
EU	European Union
IPPC	Integrated Pollution Prevention and Control
LAQM	Local Air Quality Management
LDP	Local Development Pan

LTP	Local Transport Plan
NAEI	National Atmospheric Emissions Inventory
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
NPT	Neath Port Talbot
NPTCBC	Neath Port Talbot County Borough Council
NRW	Natural Resources Wales
PAH	Polycyclic aromatic hydrocarbon. PAHs comprise a large group of compounds consisting of hydrocarbons containing two or more benzene rings fused together or to other hydrocarbon rings.
PCM	Pollution Climate Mapping. A collection of models designed to fulfil part of the UK's EU Directive (2008/50/EC) requirements to report on the concentrations of particular pollutants in the atmosphere. These models are run by Ricardo Energy & Environment on behalf of Defra. There is one model per pollutant (NO <sub>x</sub> , NO <sub>2</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , CO, benzene, ozone, As, Cd, Ni, Pb and B[a]p) each with two parts: a base year model and a projections model. The PCM provides outputs on a 1x1 km grid of background conditions plus around 9,000 representative road side values. <sup>35</sup>
PDR	Peripheral Distributor Road
PM <sub>10</sub>	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less

<sup>35</sup> <https://uk-air.defra.gov.uk/research/air-quality-modelling?view=modelling>

PM <sub>2.5</sub>	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
RLDP	Replacement Local Development Plan
STAP	Short Term Action Plan. The Welsh Government led action plan “Clean Air for Port Talbot: Short Term Action Plan 2012”, containing short term measures to be taken within the Neath Port Talbot area to reduce the risk of the daily PM <sub>10</sub> limit value or alert threshold being exceeded, and where not possible to prevent the occurrence, to limit its duration or severity. <sup>36</sup>
WG	Welsh Government
WHO	World Health Organisation

<sup>36</sup> <https://www.gov.wales/sites/default/files/publications/2019-04/clean-air-for-port-talbot-short-term-action-plan-2012.pdf>

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Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## **NEATH PORT TALBOT COUNTY BOROUGH COUNCIL**

### **CABINET**

**2<sup>nd</sup> October 2024**

### **Report of the Head of Adult Services – Ms A. Thomas**

#### **Matter for Decision**

#### **Wards Affected:**

All wards.

**Report Title:** Direct Payments Policy

#### **Purpose of the Report:**

To approve the amended Direct Payments Policy in accordance with the Social Services and Well-being (Wales) Act 2014 ('the Act').

#### **Executive Summary:**

Direct Payments are monetary payments made to individuals to meet some or all of their eligible care and support needs. This can increase a person's independence and choice by providing control over ways in which assessed needs are met and/or enable carers to continue in their caring role.

The purpose of this policy is to meet Neath Port Talbot Council's ('the Council') statutory obligations under the Act and to provide a framework for the assessment for and use of Direct Payments.

The existing policy, dated November 2019, has been amended to include further clauses in relation to the clawback of Direct Payments underspends in certain circumstances.

### **Background:**

Under the Act, and the Regulations and Codes of Practice issued under it, the Council has an obligation to offer Direct Payments as an alternative to a person with assessed eligible needs receiving care and support commissioned or provided by the Council.

After receiving a needs assessment people eligible for care and support from the Council will receive a financial assessment, following which they may be asked to pay a charge towards the cost of the care and support. People will only be required to pay what they can afford in accordance with regulations, further outlined in the Council's Residential and Non-Residential Care Charging Policy.

The policy's intention is to maximize individuals' choice and control in how they receive social care and support, whilst also taking the Council's resources into account when assessing an individual's eligible needs to ensure services are provided on a fair and equitable basis as far as possible.

In all cases the Council, following a Financial Assessment, will fund a service that meets the eligible assessed needs of, and agreed desired outcomes for, the person, or will provide Direct Payments at a level which it estimates to be equivalent to the reasonable cost of securing the provision of that care and support, and a person will be asked to contribute towards the cost of that service solely in accordance with

regulations made under the Social Services and Well-being (Wales) Act 2014.

Recent audits of Direct Payments recipients' accounts have revealed instances of underspend, i.e. where a client has been assessed as needing a Direct Payment but has not spent the full amount allocated, thereby requiring the Council to seek a refund from each individual.

There are two main reasons for an underspend: either an individual has experienced delays in recruiting a Personal Assistant (PA) but the amount continues to accumulate pending employing a PA; or, where the individual's needs are being met but at a lower overall cost to that in their assessment.

In order to better manage Council resources, additional clauses will be added to the Policy establishing a limit of 8 weeks' equivalent individual DP before 'freezing' payments. This will be done on a case by case basis and only in consultation with the individual concerned (or their appointed representative). The 8-week threshold will ensure an individual has sufficient contingency funds.

When an individual is successful in recruiting a PA their payments will return to the assessed level. Where someone has been identified as not requiring the full initial amount their needs will be re-assessed and a more suitable level of payments will be made thereafter.

By implementing these clauses it will reduce the amount of underspend and by implication the need to seek refunds. This will improve financial management and ensure in a more timely manner that individuals do not receive a DP excessively greater than that suitable to their assessed needs.

**Financial Impacts:**

The Direct Payments Policy has been developed on the basis of the Directorate's budgetary savings for 2024-25.

**Integrated Impact Assessment:**

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. The first stage impact assessment has indicated that a more in-depth assessment was required.

An overview of the Integrated Impact Assessment has been included below in summary form only and it is essential that Members read the Integrated Impact Assessment, which is attached to the report at Appendix 3, for the purposes of the meeting.

The aim of this amended policy is to improve fairness of access to services, as well as the long term sustainability of service provision in line with the Social Services and Well-being (Wales) Act 2014 and the Well-being of Future Generations (Wales) Act 2015.

When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive. Assessed need will take into account various protected characteristics.

The aim of the Direct Payments Policy is to promote flexibility in service provision so that recipients can access care and support other than via services provided or commissioned by the Council.

It also promotes safeguarding of vulnerable clients and contributes towards service sustainability to meet the outcomes of a growing population with adult social care needs.

It is concluded that overall the policy will have a neutral impact on protected characteristics. The purpose of the policy is to help protect Neath Port Talbot's most vulnerable citizens. The policy's intention is

to make access to services to be as flexible, fair and equitable as possible for all those with an eligible assessed need. It will also ensure long term sustainability of services in line with the Well-being of Future Generations (Wales) Act 2015.

**Valleys Communities Impacts:**

No implications.

**Workforce Impacts:**

No implications.

**Legal Impacts:**

The Policy has been developed in line with the Social Services and Well-being (Wales) Act 2014, associated Regulations and Codes of Practice.

**Risk Management Impacts:**

None.

**Consultation:**

The vast majority of the policy document is a readable explanation of the Direct Payments system, rather than being a policy in the sense of setting and explaining the approach which the council has chosen to adopt within a legal framework. The sole item which involves a decision on the part of the Council is to require DBS checks in situations beyond those required by the regulations. This is a decision the Council is entitled to take as a matter of safeguarding potentially vulnerable people, under the general power in the regulations to impose conditions. It is concluded that this is not of sufficient importance and impact upon the general public to warrant formal consultation before adoption.

Therefore, there is no requirement for external consultation on this item.

**Recommendations:**

- It is recommended that Members approve the Direct Payments Policy attached as Appendix 1 and 2 to this report.

**Reasons for Proposed Decision:**

To comply with the requirements of the Social Services and Wellbeing (Wales) Act 2014 and Part 4 Code of Practice (Meeting Needs) and Part 4 & 5 Code of Practice (Charging and Financial Assessment).

To improve service sustainability as well as management of Council resources.

**Implementation of Decision:**

The decision is proposed for implementation after the three day call in period.

**Appendices:**

Appendix 1 – Direct Payments Policy.

Appendix 2 – Easy Read Version.

Appendix 3 – Integrated Impact Assessment.

**List of Background Papers:**

Social Services and Wellbeing (Wales) Act 2014 and associated Regulations (Part 4 and 5 Code of Practice).

<http://gov.wales/topics/health/socialcare/act/code-of-practice/?lang=en>

Fairness of Service Provision Policy.

<http://moderngov.neath-porttalbot.gov.uk/documents/s53688/Appendix%201%20-%20Fairness%20of%20Service%20Provision%20Policy%20-%20Final%201st%20October%202019.pdf>

NPT Residential and Non-Residential Care Charging Policy.

[https://democracy.npt.gov.uk/documents/s36079/050418%20Charging%20Policy%20Report\\_.pdf](https://democracy.npt.gov.uk/documents/s36079/050418%20Charging%20Policy%20Report_.pdf)

**Officer Contact:**

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Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

# Social Services Direct Payments Policy

## August 2024

This document is also available in Welsh

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## SECTION 1 – RECEIVING A DIRECT PAYMENT

### 1. Policy Statement and Legal Framework

Neath Port Talbot Council ('the Council') is committed to ensuring that all people with an assessed eligible care and support need receive high quality, sustainable and personalised responses to meet that need and help them to achieve their agreed personal outcomes.

Direct Payments are payments of money made to individuals to use to meet some or all of their eligible care and support needs. This can increase a person's independence and choice by providing them with control over the ways in which their assessed needs are met and/or enable carers to continue in their caring role.

The purpose of this policy, and the accompanying Guidance document, is to meet the Council's statutory obligations and to provide a framework for the use of Direct Payments.

The policy applies to adults and carers aged 16 or over, who have been assessed as eligible to receive support under the Social Services and Well-being (Wales) Act 2014 ('the Act').

The Act, together with Regulations made and Codes of Practice and Guidance issued under it, is the legislative framework that sets out the Council's duties to meet an individual's need for care and support, or support in the case of a carer, following an assessment. The Council will have a duty to meet that need if the need meets statutory eligibility criteria and cannot be met by the person's own resources or community resources.

### 2. Eligibility Criteria – who can receive Direct Payments?

Direct Payments must be offered by the Council as a way of meeting some or all of a person's assessed needs if:

- The Council considers that direct payments are an appropriate way of meeting the needs, and
- The person is capable of managing the payments, either alone or with support, or if the person lacks capacity to manage their affairs, a suitable person will do so on their behalf.

A person does not have to agree to receive direct payments and can ask to have a service provided instead. A Direct Payment can be a single payment for a specific service or item or may continue for ongoing eligible needs.

Examples of people who may be eligible for a Direct Payment include:

- People with disabilities aged 16 and over, including those with physical and learning disabilities and sensory impairments
- Adults who meet the eligibility criteria in accordance with the Act
- Adults, including people who are entitled to after care in accordance with Section 117 of the Mental Health Act 1983, if they are not subject to certain exemptions
- Adults with parental responsibility for disabled children in order to meet the disabled child's needs
- Young carers and adult carers providing regular and substantial care
- People who are subject to drugs and alcohol-related provisions of certain criminal justice legislation, but only on condition that payment is made to another person who is suitable and both persons agree to the arrangement.

There are a number of **conditions** for the provision of Direct Payments:

- The person must agree to use the funds only to secure services to meet their eligible needs and outcomes as determined by the assessment and set out in the Care and Support Plan
- The Council must assess whether a person must pay a contribution towards the cost of the care and support they need, whether that need is to be met by the provision of services or through Direct Payments. Only the net amount of the Direct Payment will be paid following the outcome of the financial assessment. The person will be required to pay any assessed contribution into the Direct Payment account in line with the Council's **Residential and Non-residential Care Charging Policy**
- The Direct Payment will be regularly reviewed to ensure the care being provided is in accordance with assessed needs, and adjustments may be made to the amount of the Direct Payment as required.
- The Council will not be liable for any costs or liabilities incurred because of an individual's failure to pay their contribution into the Direct Payments account

Those eligible will be offered Direct Payments, although there are **exemptions**. Direct Payments will not be offered to people who, following assessment, would not be offered services in any circumstances. Individuals who are eligible, but decide not to take up Direct Payments, will have commissioned services arranged on their behalf.

Direct Payments **may be refused** to people who have been placed under certain conditions or requirements by the courts. These include:

- Any offenders subject to a community order, a community rehabilitation order, or a community punishment order and rehabilitation order, which include a requirement to accept treatment for drug or alcohol dependency
- Offenders released from prison on licence subject to an additional requirement to undergo treatment for drug or alcohol dependency

### 3. Direct Payments for Adults Lacking Capacity to Consent

In cases where the person in need of care and support is assessed as lacking capacity, as defined in the Mental Capacity Act 2005 ('the MCA'), to request Direct Payments, a **Suitable Person** can request the Direct Payment on the individual's behalf.

A Suitable Person is someone appointed to receive and manage Direct Payments on behalf of an individual who lacks capacity to consent to the making and receiving of the Direct Payments (provided that person is willing and meets all the conditions set out in the Regulations). The Suitable Person will often, but not always, have been given a Lasting Power of Attorney or have been appointed by the Court of Protection as a deputy under Section 16 of the MCA. Usually the Suitable Person will be a family member or friend who may previously have been involved in the care and support of the individual.

In these cases, before authorising a Direct Payment, the Council must satisfy itself that:

- It is not prohibited from meeting the individual's needs by making Direct Payments to the Suitable Person
- The Suitable Person will act in the individual's best interests in arranging for the provision of the care and support for which the Direct Payments would be used

- The Suitable Person is capable of managing the Direct Payment either independently or with support
- Making Direct Payments to the Suitable Person is an appropriate way of meeting needs

If there is no representative, then the Council itself must make the decision about whether or not someone should act as a Suitable Person to manage the payments on behalf of the person who cannot consent. This will be determined through a Best Interest Assessment meeting.

To protect the interests of people lacking capacity, the Council will require that the Suitable Person will be subject to a satisfactory Disclosure and Barring Service (DBS) check (see also 'Safeguarding' below).

#### 4. Transition

The Council has clear obligations regarding children and to make sure that Adult Services and Children and Young People Services (CYPS) cooperate to anticipate and support the transition of a young disabled person into adulthood. The guiding principle is that the welfare of the child is paramount.

A young person aged 16 or 17 can receive Direct Payments if they are assessed by the Council as being eligible. Direct Payments are given to 16 and 17 year old disabled children directly rather than to their parents or carers. The young person can then decide which services to use. This only applies if the young person is considered "competent" to organise their own care.

In determining whether the young person will be eligible for adult social care provision upon reaching the age of 18, Adult Services will need to complete a full assessment with the young person to identify the well-being outcomes and relevant care and support or assistance required to enable them to live their life as independently as possible. When the young person turns 18 they will also receive benefits in their own right, which means they will be required to declare their financial circumstances and be assessed to make a financial contribution.

Continuing a Direct Payment after childhood will be dependent on the individual and the identified well-being outcomes discussed in partnership during the transition process. The Direct Payment may reduce, increase or end but the family and the person themselves will be kept updated and informed during the process and provided with relevant support.

If people with parental responsibility are going to continue in their caring role after the young person becomes 18 then such carers may be entitled to receive Direct Payments as an alternative to carers' services.

There may be situations where a parent has been receiving Direct Payments to meet the well-being outcomes of their child who, on reaching the age of 18, does not have the requisite mental capacity to consent to the making of those Direct Payments. In such cases, it will often be appropriate for the person with parental responsibility to continue to receive the Direct Payments for the young adult lacking capacity, in the role of a Suitable Person (see 3 above). This will ensure continuity of care for the young adult, and ensure that the payments are managed by the person who is likely to be best placed to understand the individual's needs and preferences.

## 5. Financial Assessment

The Council will carry out a financial assessment under Part 5 of the Code of Practice with the person or their financial representative to establish how much, if anything, a person has to contribute towards their Direct Payment.

The Council will make a monetary payment into the Direct Payments account based on the client's assessed eligible needs and the completion of a Care and Support Plan.

Recipients will be paid net of any assessed charges. As such, individuals must ensure their contribution is paid directly into the Direct Payments account and will be included in the calculation for the overall total of a Direct Payment. Failure to pay this contribution will lead to insufficient funds being available to pay any responsibilities associated with the Direct Payment, e.g. wages, tax bills or payroll fees. Any contribution payable will be reviewed on an annual basis (or following a change in financial circumstances) and as such may be recalculated.

The principle of Direct Payments is that an individual manages their payments to buy care and support to meet their needs. The Council will not be liable for any costs and liabilities incurred because of an individual's failure to pay their contribution into the Direct Payments account or to manage their payments properly.

## 6. Reasonable Funding and Personal Top Up

The total amount of a Direct Payment will depend on the person's assessed need, but will not exceed what is considered reasonable for the person to have to pay to secure the relevant service(s). The Council has a duty to make adequate arrangements to meet the person's assessed needs but is not obliged to fund additional costs associated with the person's preferred method of securing the service or cost incurred by the person.

If a Direct Payment recipient chooses to secure services that are more expensive than the amount received as a Direct Payment, then the individual will need to make a payment from their personal funds for the difference in cost (**see Fairness of Service Provision Policy**).

The money is held by the Direct Payment recipient as a means of paying for their social care needs. It is not their personal money or welfare benefit, and they will be required to provide evidence that it has been used properly to meet their assessed needs.

## 7. How will I receive my Direct Payment

There are a number of ways in which funds can be received and the Direct Payments Support Service (DPSS) will be able to offer advice and guidance on the most appropriate for the individual concerned.

### **Prepaid Card**

This is an alternative to a bank account and looks similar to a debit card. Funds are preloaded onto the card by the Council and the person (where they have been assessed to make a financial contribution towards support). When the funds are transferred onto the Prepaid Card they are available to use instantly.

The card can be used to pay for care and support to meet needs as agreed in the support plan up to the value that is loaded onto the card.

The person can view spend activity online and this information is retained and available to print as needed. The client can upload documents, e.g. receipts, and there is no need to send the Council statements regularly, as the Council can access the information online. Using a pre-paid card will therefore reduce the financial monitoring requirements of the client.



### **Directly to a Bank Account**

This is where money is paid into a high street bank account. This can be an account for the individual or the person who represents them, but it must be a separate account from their normal bank account to clearly show the money being spent on care and support.

Using this method the person must retain the bank account statements and receipts and submit these on request as evidence of the spending on care and support needs. Submission of these documents is usually quarterly and is set out in the agreement signed by the Direct Payment recipient.

### **Managed Account**

A Managed Account Service is a way to get additional help and support for recipients to administer their Direct Payments. Direct Payments are made to a commissioned payroll provider service which manages the funds on their behalf, but the recipient or Suitable Person remains responsible for how Direct Payments are used. For example, if Direct Payments are used to employ staff the recipient / Suitable Person is the employer, and (s)he must ensure that staff are properly trained for their role, e.g. in manual handling, and that this is kept up to date. The payroll provider will carry out payroll functions such as tax, National Insurance and pensions on a day to day basis. The DPSS will be able to offer advice and guidance on this.

## **SECTION 2 – HOW TO SPEND DIRECT PAYMENTS**

### **8. What can Direct Payments be used for?**

Direct Payments can facilitate a wide range of well-being outcomes and promote independence and choice. They can be used to purchase support and assistance, including preventive and rehabilitative support, as identified in the individual assessment of need and agreed as well-being outcomes in the Care and Support Plan. Examples include:

- Employing a Personal Assistant (PA) e.g. to provide support with daily living activities such as personal care, attending appointments and events
- To access support from an accredited domiciliary care agency
- Long term residential care
- Purchasing short breaks in a care home or other agreed facility which will meet the respite need (see **Respite Allocation Policy**)

- As a one-off payment for short-term interventions
- Purchasing specialist lower cost equipment and adaptations (i.e. excluding Disabled Facilities Grants). Although in principle equipment is available via a Direct Payment, in practice it may be more cost effective for the Council to purchase this
- Accessing daytime activities and support from providers

When completing a care and support plan, a person may choose which needs they would like to meet using Direct Payments and to have some of their needs met by commissioned services.

There may be a number of people who have similar support needs and would be interested in pooling some of their Direct Payments to organise joint activities or services. **Pooling funding** means taking some of your Direct Payments and adding it to funding from one or more people to purchase a service together. You may be able to get more for your money by sharing the cost of activities and have the opportunity to spend more time with other people.

#### 9. Direct Payments cannot be used

- For anything which puts the recipient or others at risk.
- For gambling or anything illegal
- To purchase services/items that do not meet the agreed outcomes in a person's care and support plan
- To fund existing informal family support
- To pay for personal or household expenses, such as personal loans, utility bills, household bills, rent or mortgage payments
- To pay self-employed PAs
- To purchase a service for someone who is no longer resident in the Council's area other than by prior agreement in writing by the Council
- By a carer to pay him/herself for care and support provided to the person they care for
- To purchase services or equipment that would otherwise be the responsibility of other authorities to arrange, e.g. NHS or housing authorities (Direct Payments are not a substitute for Disabled Facilities Grants)

## 10. Paying Family Members

The person can use the Direct Payment to pay a family member. When considering whether employing the relative will provide the best well-being outcome for that individual, the local authority must consider the views of the recipient before coming to a decision. Where appropriate safeguards are in place the employment of a relative living in the same household is often the most suitable way of providing care as it enables and supports continuity of care, recognition of personal choice and promotes early intervention.

Under the Act, the Council has a duty to ensure that employing a family member is a suitable and safe use of the Direct Payment and that the support will meet the person's needs. This will be discussed with the person as part of the assessment and support planning process.

As such, the Council may authorise Direct Payments to pay a close relative living in the same household (close relative means parent, parent-in-law, aunt, uncle, grandparent, son, daughter, son-in-law, daughter-in-law, stepson or daughter, brother, sister or the spouse or partner, niece, nephew or grandchildren of any of the preceding). The Regulations state that this may happen where the Council deems it as necessary to meet the well-being outcomes of the person. Where the Council does not consider that it is necessary to promote a person's well-being, it must impose a condition that the Direct Payment is not to be used to pay a relative living in the same household.

## 11. Safeguarding

Safeguarding concerns the protection of vulnerable people from situations that place them at risk of harm, neglect or exploitation. Safety in transactions and all other areas of Direct Payments is crucial and assessing the risk factors associated with them is essential. The Council's policy and procedures on Safeguarding must be followed.

The nominated Suitable Person managing the Direct Payment shall ensure that, when employing anyone who will provide unsupervised support to young children or a vulnerable adult, they conduct the enhanced DBS (Disclosure and Barring Service) check to ensure that the person has no relevant criminal convictions that would preclude them from working with children or vulnerable people. This has to be completed and the DBS clear before they commence employment. The adult, carer, young carer, parent of a disabled child, suitable

person or organisation must share information with the Council when there are concerns about information on the DBS check which could result in a risk to the adult or child by contacting the Direct Payments Team. Any unclear DBS checks will have to be risk assessed before employment can commence.

If the Suitable Person mismanages the Direct Payment, the Council will investigate how this has happened. Financial abuse will be considered a safeguarding concern.

## SECTION 3 – REVIEW OF DIRECT PAYMENTS

### 12. Review of Care and Support Plans

All Care and Support Plans will be subject to a minimum of an annual review to ensure they remain the most appropriate option for meeting the individual's assessed needs, and to consider if their needs have changed and if a re-assessment is required.

Where needs and circumstances change the individual has the right to request a re-assessment of their needs for care and support. Further detail about re-assessment is included in the Code of Practice under Part 3 of the Act.

### 13. Assessments, Reviews and Reassessment

All assessments and reviews will be conducted in a timely manner in accordance with the Act, and should reflect the realities and needs of the individual. The focus will be on the person's well-being outcomes and any barriers that there are to the person achieving them. The assessor will draw on the person's strengths, assets, personal relationships and wider community networks and resources to explore all potential solutions.

It is important to ensure that the person's needs are being met to an appropriate standard and that the person is happy with the arrangement currently in place. Such reviews will be jointly undertaken by a Social Worker to assess whether the Direct Payment is meeting eligible need, and a Direct Payments Officer to review how the Direct Payment is working and whether all documents have been completed.

The focus of reviews will be on:

- Whether the person's needs/outcomes set in the original care and support plan are being met
- How they are managing Direct Payments
- Is the money being spent appropriately
- Are they receiving the appropriate level of support
- Have the care and support needs changed
- Are the concerns/risks identified in the risk assessment being managed

#### 14. Review of Direct Payments

The Council will review the arrangements for the making of Direct Payments and how they are being used at intervals determined in line with the requirements of the Codes of Practice for reviewing care and support plans, issued under Section 145 of the Act, but in any event an initial review will be undertaken within 6 weeks of the first payment made then at least annually following the first review.

#### 15. Financial Monitoring

The Council is accountable for the public money it manages, including Direct Payments funding. In addition to ensuring the person's assessed eligible care and support needs are being met by Direct Payments, financial monitoring will be undertaken to assess the individual's ability to manage the financial responsibility for purchasing services and to ensure there are sufficient funds to pay for employment related responsibilities (where applicable) or if funds are in excess of that needed to meet the agreed outcomes in the support plan.

As such, recipients (or Suitable Persons) of Direct Payments will be expected to keep accurate records to identify how the money is used to provide services to individuals.

In the event that fraud, abuse or misuse of the Direct Payment is suspected, the Council shall investigate and suspend/terminate the Direct Payment as appropriate. In such circumstances the Council will, wherever possible, try to resolve the issues with the individual. The Council will provide the care and support to meet eligible need in the interim or in the long-term if the Direct Payment has been terminated.

If a person misuses or fails to manage their Direct Payment properly, they may incur liabilities to others, or losses, which they do not have money to meet in their Direct Payments account. The Council is not responsible for any such losses or liabilities.

#### 16. Build-up of money in the Direct Payments account

The individual is permitted to build up money in the account when it is planned and stated in the Care and Support Plan. The amount of money can be up to 8 weeks' of the Direct Payment. Any amount above this will only be allowed in specific circumstances and the individual has to have written agreement from the Council to save this amount.

If the Council identifies that the Direct Payments account has an accrual equivalent to more than 8 weeks' of payments, or there is a build-up of money that has not been planned for and included in the Care and Support Plan, the Council can ask for the money to be given back or make a change to the amount of Direct Payments money.

#### 17. Seeking Repayment

In some circumstances the individual may be asked to repay some/all of the Direct Payments to the Council. This will happen if it appears that the money has not been used for the agreed purpose and to meet the agreed outcomes.

It may also happen if there is an accidental overpayment, illegal activity, or if excess money builds up in the account which is more than is needed to pay for assistance to meet the assessed needs.

If the individual fails to submit the required records when requested, they may be asked to repay some/all of the Direct Payments.

In the event of the death of the Customer receiving Direct Payments, payments to the Direct Payments account will be discontinued with effect from the date of death and any remaining balance in the account will be returned to the Council. There may still be outstanding commitments from the account for such things as Personal Assistant wages, or tax and National Insurance bills. There may also be an entitlement to statutory redundancy for a Personal Assistant.

The Council will assess whether it is appropriate to seek recovery on a case by case basis, based on the individual circumstances. Further information can be found in the **Adult Services Debt Management and Recovery Policy**.

In principle:

- The Council is likely to require full or partial repayment of Direct Payments if any condition attached to Direct Payments by the Council is unmet or the Council has reason to believe the payments have not been used to secure the care and support a recipient requires, and their personal outcomes have not been achieved.
- The Council may require repayment of any unspent Direct Payment if they are not required to meet needs as set out in the plan.
- The Council will require repayment of excess funds accumulated in the dedicated bank account where there is no reasonable explanation for the surplus. The Council may also seek to recover excess Direct Payment account balances following the course of the regular financial monitoring of the Direct Payments account. The powers available to the Council are intended to enable it to recover public money that has not been spent for the purpose for which it was intended or to recover money not spent at all. It is essential that before anyone receives a Direct Payment they understand completely the conditions that they will be required to meet.
- Direct Payments do not form part of an estate in the event that someone dies while receiving them. The funds at all times belong to the Council and remains public funds. In the event of the death of the Direct Payment recipient the Council will deal sensitively with the matter, and will contact the Suitable Person or executor of the deceased's estate to support them through the process of closing the Direct Payment, i.e. meeting any outstanding payments such as wages, redundancy, submitting any final returns to Finance, etc.

## SECTION 4 – ENDING DIRECT PAYMENTS

### 18. Discontinuing Direct Payments

Direct Payments may need to end for a number of reasons, including:

- Where it has been identified there is evidence of abuse or neglect related specifically to the Direct Payment, where Direct Payment conditions are not being met or where fraud has been detected

- The Council may decide it is not satisfied through the assessment care management/finance review process that the person's identified eligible well-being outcomes are being met or the funds are being used as intended
- When a person to whom Direct Payments are made, whether to purchase support for themselves or on behalf of someone else, decides they would prefer the Council to arrange their support directly, the recipient of the Direct Payment should finalise any outstanding payments including returning any unspent money to the Council and close the Direct Payment account within 28 days

The Council will give 28 days' notice to discontinue a Direct Payment. Care and support purchased after this period will be covered by Direct Payments.

### **Discontinuing Direct Payments in the case of persons with capacity to consent**

Where an adult or young person aged 16 or 17 with capacity is in receipt of a Direct Payment but loses capacity to manage the Direct Payment, the Council will discontinue Direct Payments to that person and consider making payments to a Suitable Person instead.

In the event that the loss of capacity to consent is temporary, the Council may continue to make payments if there is someone else who is willing to manage the payment. This will be a temporary measure until the person has regained capacity.

### **Discontinuing Direct Payments in the case of persons lacking capacity to consent**

The Council shall discontinue Direct Payments if the nominated person or organisation is not acting in the best interest of the person within the meaning of the Mental Capacity Act 2005.

In all cases the DPSS will work with the recipient or Suitable Person to ensure that any employment responsibilities (e.g. redundancies) are dealt with appropriately, conduct a review of the Care and Support Plan to consider alternative arrangements to meet needs, and ensure there is no gap in the care and support.

Direct Payments will be discontinued when a person no longer needs the support for which the Direct Payment is made.



## SECTION 5 – MISCELLANEOUS

### 19. Complaints / Appeals Procedure

Should a person who accesses services or their carer wish to challenge any decisions made, (s)he should refer to the Council's appeals procedure. This process has a clear route of appeal and timescale for handling appeals.

Individuals and/or their carers should be provided with information explaining how to complain about Social Services in Neath Port Talbot, which is available in accessible formats and different languages. The leaflet and details of the complaints procedure can also be accessed online via the Council's website [www.npt.gov.uk](http://www.npt.gov.uk). The dedicated Adult Services Complaints telephone number is (01639) 763445, or via email: [complaints@npt.gov.uk](mailto:complaints@npt.gov.uk)

### 20. Review of the Policy

The policy reflects the Council's current position and will be reviewed biennially.

### 21. Resources

Paying for Residential and Community Care: <https://www.npt.gov.uk/1290>

Direct Payments Suitable Person Guidance:  
<https://www.allwalesforum.org.uk/wp-content/uploads/direct-payments-suitable-person-guidance.pdf>

The Mental Capacity Act 2005:  
<http://www.legislation.gov.uk/ukpga/2005/9/contents>

Mental Health Act 1983:  
<http://www.legislation.gov.uk/ukpga/1983/20/contents>

Respite Allocation Policy

Fairness of Service Provision Policy

Lifting Operations and Lifting Equipment Regulations 1998 (LOLER):  
<http://www.hse.gov.uk/work-equipment-machinery/loler.htm>

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**Easy Read Version  
of  
Neath Port Talbot Council's  
Direct Payments Policy 2024**



# What is the Policy about?



The Policy describes how Neath Port Talbot Council will provide Direct Payments to people who have an assessed social care and support need.



The Policy tells us how the Council will make sure people with assessed care and support needs can access services that maximise their choice and control. Direct Payments allow the recipient to choose how their needs are met, instead of the Council arranging care for them.



This Policy will apply to people who already receive care and support services as well as people who may need care and support in the future.

## What does Neath Port Talbot Council want out of the Policy?

We want to make sure that the most vulnerable adults and their unpaid carers in Neath Port Talbot have the right amount of help to meet their care and support needs.

An unpaid carer is someone who looks after a family member, partner or friend with a health or social care need, and the care they give is unpaid.

A Direct Payment means that a person can arrange the care and support they want rather than the Council arrange it for them. The value of the Direct Payment will be similar to the amount it will cost the Council to arrange the care.

This will be reviewed each year to make sure it still meets identified eligible needs.

If the recipient wants care and support in a different way or one that costs more than what the Council assesses as being able to meet their needs, they may have to pay any additional costs.

## **Our Aim**

The Council wants to help its most vulnerable citizens and make sure those who need support get it.

We want to do this in a way that is fair to all those in need.

When assessing or re-assessing someone's needs, the Council will take into account the social care resources available to it when considering how those needs might be met.

We want to make sure that those who need care and support most can access services.

We will offer people choice and control over the services that can best meet their assessed needs and desired outcomes in a way that is sustainable.

## **Who will be affected by this Policy?**

We will look at what services a person needs as part of their Care and Support Plan assessment and their Carer's Assessment.

We will also look at a person's needs as part of their Care and Support Plan review and the review of the Carer's Assessment to see if their needs and outcomes have changed, or if their needs can be met by a different type of service.

This means that people currently having care and support and those who might need it in the future will be affected by this Policy.

## More about Direct Payments

Direct Payments are cash payments given to you by the Council to arrange and pay for your own care and support instead of the Council arranging services for you.

They allow you to choose and control who supports you and how, when and where this support is provided.

This means:

- You control the decisions that affect your life
- Day-to-day control of the money and provision of your care is given to you
- You have flexibility and choice, enabling you to purchase support that is best suited to your needs and what you want

Direct Payments must be used to meet your social care and support needs as described in your Assessment, and could be spent on things like:

- Residential care
- Purchase certain equipment or adaptations
- A sitting service, so that someone can look after the person you care for at home, while you go out during the day or night
- Access to leisure services
- Support services from an agency

Employing a Personal Assistant to provide care and support is one of the most common ways people choose to use Direct Payments.

The Council's Direct Payments Support Service can give you help and advice around employing a Personal Assistant.

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## Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

### Version Control

Version	Author	Job title	Date
Version 1	Andrew Potts	Commissioning Officer	5 <sup>th</sup> November 2019
Version 2	Andrew Potts	Commissioning Officer	29 <sup>th</sup> May 2024

### 1. Details of the initiative

	<b>Title of the Initiative:</b> Social Services Direct Payments Policy (Revised 2024)
<b>1a</b>	<b>Service Area:</b> Adult Services
<b>1b</b>	<b>Directorate:</b> Social Services, Health & Housing
<b>1c</b>	<b>Summary of the initiative:</b> The purpose of this policy is to meet Neath Port Talbot Council's statutory obligations under the Social Services and Well-being (Wales) Act 2014 and to provide a framework for the assessment for and use of Direct Payments.
<b>1d</b>	<b>Who will be directly affected by this initiative?</b> Current and future service users and their carers.
<b>1e</b>	<b>When and how were people consulted?</b> No requirement for public consultation.
<b>1f</b>	<b>What were the outcomes of the consultation?</b> Not applicable.

## 2. Evidence

### What evidence was used in assessing the initiative?

Social Services routinely collects data as part of the assessment/review process of individuals and carers, which is reported annually to Welsh Government.

In addition to the number of people accessing the services, limited equalities data such as age, disability, ethnicity and sex is also collected, which in turn informs policy development and service provision. The following provides a summary of information known about current recipients of Direct Payments:

Age Group	Female	Male	Grand Total
10 and under	7	13	20
11 to 15	11	11	22
16 to 19	8	17	25
20s	20	50	70
30s	31	28	59
40s	30	11	41
50s	36	19	55
60s	29	24	53
70s	23	16	39
80s	13	8	21
90+	8	1	9
<b>Grand Total</b>	<b>216</b>	<b>198</b>	<b>414</b>

Ethnicity	Female	Male	Grand Total
BANGLADESHI	1		1
BLACK CARIBBEAN		1	1
NOT OBTAINED	11	7	18
OTHER	1	1	2
OTHER MIXED	1	1	2
WELSH	44	34	78
WHITE BRITISH	155	151	306
WHITE IRISH	1		1
WHITE OTHER	1	3	4
WHITE/BL.CARIB.	1		1
<b>Grand Total</b>	<b>216</b>	<b>198</b>	<b>414</b>

52% of current recipients are female. The largest single age group is those in their 20s (17% of total), while around one-in-three (30%) are aged 60+. Some 74% of those we hold information for stated they were White British.

Religion	Female	Male	Grand Total
AETHIEST	1	1	2
BAPTIST	2	3	5
BUDDHIST	1		1
C/SPIRITUALIST	1		1
CH. OF ENGLAND	14	7	21
CH. OF WALES	7	8	15
CHRISTIAN	4	7	11
EVANGELICAL	1		1
JEH. WITNESS		2	2
METHODIST	3	2	5
MUSLIM	1		1
NO RELIGION	30	53	83
OTHER RELIGION	1	3	4
PENTECOSTAL	1		1
PRESBYTARIAN	1	1	2
ROMAN CATHOLIC	3	8	11
WELSH CHAPEL	1		1
Not Stated	144	103	247
<b>Grand Total</b>	<b>216</b>	<b>198</b>	<b>414</b>

Religion	Female	Male	Grand Total
DIVORCED	11	5	16
MARRIED	33	16	49
PARTNERS	3	2	5
SEPARATED	6	1	7
SINGLE	83	84	167
WIDOWED	15	6	21
Not Stated	65	84	149
<b>Grand Total</b>	<b>216</b>	<b>198</b>	<b>414</b>

Of those who stated they have a religion/belief, the largest denomination was Church of England. Some 63% of those whose marital status is recorded stated they were single.

Client Group	Female	Male	Grand Total
CARER	1		1
CHILDRENS	1		1
ELDERLY	1		1
LEARN.DIFF.	45	66	111
MENTAL	3	2	5
PHYSICAL	58	36	94
Not Stated	107	94	201
<b>Grand Total</b>	<b>216</b>	<b>198</b>	<b>414</b>

Of those where a client group is recorded on Oracle, more than half (52%) are recorded as having a learning disability.

### 3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age			X	<p>Data shows that a high number of people receiving adult services care and support have a protected characteristic by virtue of their age.</p> <p>Adult Services provide needs-led, person centred support. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p>

			<p>When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control possible in regards to the care they receive.</p> <p>Assessment of need will take into account various protected characteristics including age and disability.</p> <p>Although the policy will mainly affect people with a disability or age related frailty, there is no evidence that the policy would lead to discrimination. All people will be offered a choice from a range of interventions including Direct Payments. In addition, people will be able to contribute to a more expensive provision, which gives more choice to those that wish and can use their own resources.</p> <p>Those people with more limited resources may not benefit from this element of the proposal and there may be a perception that they have less choice and control or see a negative impact to their finances. However, people will only be required to contribute towards the cost of meeting their eligible care needs what they are assessed as being able to as this policy does not change the Council's Fairer Charging Policy and all people will be able to contribute to their assessment and have a choice of interventions that can meet their identified eligible needs.</p> <p>This policy will not change the Council's obligations to ensure people's eligible needs are met. The Council is not, however, bound to meet a need in the way preferred by an individual, particularly where the cost of that preferred way is higher than other reasonable ways.</p> <p>Some people may see a change to services following a review and this may be perceived by those receiving services and their family/carers as having a negative impact. However, any change will be planned with the person. Changes are not necessarily as a result of this policy as reviews take place to assess changes in need. All people will continue to receive services that meet eligible needs and be</p>
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			<p>given choice, and their views and individual circumstances will be taken account of when determining the options available to the person/family/carer to meet their eligible needs.</p>
Disability		X	<p>Data shows that a high number of people receiving adult services care and support have a protected characteristic by virtue of their disability.</p> <p>Adult Services provide needs-led, person centred support. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control possible in regards to the care they receive.</p> <p>Assessment of need will take into account various protected characteristics including age and disability.</p> <p>Although the policy will mainly affect people with a disability or age related frailty, there is no evidence that the policy would lead to discrimination. All people will be offered a choice from a range of interventions including Direct Payments. In addition, people will be able to contribute to a more expensive provision, which gives more choice to those that wish and can use their own resources.</p> <p>Those people with more limited resources may not benefit from this element of the proposal and there may be a perception that they have less choice and control or see a negative impact to their finances. However, people will only be required to contribute towards the cost of meeting their eligible care needs what they are assessed as being able to as this policy does not change the Council's Fairer</p>

			<p>Charging Policy and all people will be able to contribute to their assessment and have a choice of interventions that can meet their identified eligible needs.</p> <p>This policy will not change the Council's obligations to ensure people's eligible needs are met. The Council is not, however, bound to meet a need in the way preferred by an individual, particularly where the cost of that preferred way is higher than other reasonable ways.</p> <p>Some people may see a change to services following a review and this may be perceived by those receiving services and their family/carers as having a negative impact. However, any change will be planned with the person. Changes are not necessarily as a result of this policy as reviews take place to assess changes in need. All people will continue to receive services that meet eligible needs and be given choice, and their views and individual circumstances will be taken account of when determining the options available to the person/family/carer to meet their eligible needs.</p>
<p>Gender reassignment</p>		<p>X</p>	<p>Access to adult services is unlikely to be solely due to a person's gender identity. However, personal circumstances relating to a person's gender identity may have an impact on how services are delivered.</p> <p>Adult Services provide needs-led, person centred support. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive.</p> <p>Assessment of need will take into account various protected characteristics.</p>

			<p>There is no evidence to indicate that the policy would lead to discrimination due to the person's gender identity.</p> <p>This policy will not change the council's obligations to ensure people's eligible needs are met. The Council is not, however, bound to meet a need in the way preferred by an individual, particularly where the cost of that preferred way is higher than other reasonable ways.</p> <p>Some people may see a change to services following a review and this may be perceived by those receiving services and their family/carers as having a negative impact. However, any change will be planned with the person. Changes are not necessarily as a result of this proposal as reviews take place to assess changes in need. All people will continue to receive services that meet eligible needs and be given choice, and their views and individual circumstances will be taken account of when determining the options available to the person/family/carer to meet their eligible needs.</p>
<p>Marriage &amp; civil partnership</p>		<p>X</p>	<p>Unpaid carers are often family members/partners of the person being cared for, which can have an impact on relationships and cause difficulties in maintaining the caring role as well as their personal relationships.</p> <p>Adult Services provide needs-led, person centred support. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan, and carer's assessment where applicable.</p> <p>When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive.</p>



			<p>Eligibility criteria when undertaking an assessment or reassessment of a person's care and support needs take into account individual circumstances of the carer and the cared for person in order to ensure that services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers, where applicable, are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>There is no evidence to indicate that the policy would lead to discrimination of individuals due to their marital status.</p> <p>This policy will not change the council's obligations to ensure people's eligible needs are met. The Council is not, however, bound to meet a need in the way preferred by an individual, particularly where the cost of that preferred way is higher than other reasonable ways.</p> <p>Some people may see a change to services following a review and this may be perceived by those receiving services and their family/carers as having a negative impact. However, any change will be planned with the person. Changes are not necessarily as a result of this policy as reviews take place to assess changes in need. All people will continue to receive services that meet eligible needs and be given choice, and their views and individual circumstances will be taken account of when determining the options available to the person/family/carer to meet their eligible needs.</p>
Pregnancy and maternity		X	<p>It is possible that someone providing unpaid care may be, or become, pregnant which can cause difficulties in maintaining the caring role. It is also possible that the cared for person may become pregnant or have a young child, which would need to be taken into account when determining how to best meet any care and support needs.</p>

			<p>Adult Services provide needs-led, person centred support. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>Eligibility criteria when undertaking an assessment or reassessment of a person's care and support needs take into account individual circumstances of the carer and the cared for person in order to ensure that services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers, where applicable, are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive.</p> <p>There is no evidence to indicate that the policy would lead to discrimination due to a person's pregnancy or maternity circumstances. Some people may feel that there is a reduction in choice as the council will need to take into account if their needs can be met in a more cost effective way. However, all people will be offered a choice from a range of interventions including Direct Payments. In addition, people will be able to contribute to a more expensive provision, which gives more choice to those that wish and can use their own resources.</p> <p>Those people with more limited resources may not benefit from this element of the proposal and there may be a perception that they have less choice and control or see a negative impact to their finances. However, people will only be required to contribute what they are assessed as being able to as this policy does not change the Council's Fairer Charging Policy and all people will be able to contribute to their</p>
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Race		X	<p>Access to adult services care and support is unlikely to be solely due to a person's race. However, personal circumstances relating to a person's race may have an impact on how services are delivered.</p> <p>Adult Services provide needs-led, person centred support. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive.</p> <p>Eligibility criteria when undertaking an assessment or reassessment of a person's care and support needs take into account individual circumstances of the carer and</p>

			<p>the cared for person in order to ensure that services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers, where applicable, are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>There is no evidence to indicate that the policy would lead to discrimination due to a person's race. Some people may feel that there is a reduction in choice as the council will need to take into account if their needs can be met in a more cost effective way. However, all people will be offered a choice from a range of interventions including Direct Payments. In addition, people will be able to contribute to a more expensive provision, which gives more choice to those that wish and can use their own resources.</p> <p>Those people with more limited resources may not benefit from this element of the proposal and there may be a perception that they have less choice and control or see a negative impact to their finances. However, people will only be required to contribute what they are assessed as being able to as this policy does not change the Council's Fairer Charging Policy and all people will be able to contribute to their assessment and have a choice of interventions that can meet their identified eligible needs.</p> <p>This policy will not change the council's obligations to ensure people's eligible needs are met. The Council is not, however, bound to meet a need in the way preferred by an individual, particularly where the cost of that preferred way is higher than other reasonable ways.</p> <p>Some people may see a change to services following a review and this may be perceived by those receiving services and their family/carers as having a negative impact. However, any change will be planned with the person. Changes are not necessarily as a result of this policy as reviews take place to assess changes in need. All people will continue to receive services that meet eligible needs and be</p>
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			<p>given choice, and their views and individual circumstances will be taken account of when determining the options available to the person/family/carer to meet their eligible needs.</p>
Religion or belief		X	<p>Access to adult services care and support is unlikely to be solely due to a person's religion or belief. However, personal circumstances relating to a person's religion or belief may have an impact on how services are delivered.</p> <p>Adult Services provide needs-led, person centred support. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive.</p> <p>Eligibility criteria when undertaking an assessment or reassessment of a person's care and support needs take into account individual circumstances of the carer and the cared for person in order to ensure that services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers, where applicable, are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>There is no evidence to indicate that the policy would lead to discrimination due to a person's religion or belief. Some people may feel that there is a reduction in choice as the council will need to take into account if their needs can be met in a more cost effective way. However, all people will be offered a choice from a range of interventions including Direct Payments. In addition, people will be able to contribute to a more expensive provision, which gives more choice to those that wish and can use their own resources.</p>

			<p>Those people with more limited resources may not benefit from this element of the proposal and there may be a perception that they have less choice and control or see a negative impact to their finances. However, people will only be required to contribute what they are assessed as being able to as this policy does not change the Council's Fairer Charging Policy and all people will be able to contribute to their assessment and have a choice of interventions that can meet their identified eligible needs.</p> <p>This policy will not change the council's obligations to ensure people's eligible needs are met. The Council is not, however, bound to meet a need in the way preferred by an individual, particularly where the cost of that preferred way is higher than other reasonable ways.</p> <p>Some people may see a change to services following a review and this may be perceived by those receiving services and their family/carers as having a negative impact. However, any change will be planned with the person. Changes are not necessarily as a result of this policy as reviews take place to assess changes in need. All people will continue to receive services that meet eligible needs and be given choice, and their views and individual circumstances will be taken account of when determining the options available to the person/family/carer to meet their eligible needs.</p>
Sex		X	<p>Access to adult services care and support is unlikely to be solely due to a person's sex. However, personal circumstances relating to a person's sex may have an impact on how services are delivered</p> <p>Adult Services provide needs-led, person centred support. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p>

			<p>When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive.</p> <p>Eligibility criteria when undertaking an assessment or reassessment of a person's care and support needs take into account individual circumstances of the carer and the cared for person in order to ensure that services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers, where applicable, are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>There is no evidence to indicate that the policy would lead to discrimination due to a person's sex. Some people may feel that there is a reduction in choice as the council will need to take into account if their needs can be met in a more cost effective way. However, all people will be offered a choice from a range of interventions including Direct Payments. In addition, people will be able to contribute to a more expensive provision, which gives more choice to those that wish and can use their own resources.</p> <p>Those people with more limited resources may not benefit from this element of the proposal and there may be a perception that they have less choice and control or see a negative impact to their finances. However, people will only be required to contribute what they are assessed as being able to as this policy does not change the Council's Fairer Charging Policy and all people will be able to contribute to their assessment and have a choice of interventions that can meet their identified eligible needs.</p> <p>This policy will not change the council's obligations to ensure people's eligible needs are met. The Council is not, however, bound to meet a need in the way preferred by</p>
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			<p>an individual, particularly where the cost of that preferred way is higher than other reasonable ways.</p> <p>Some people may see a change to services following a review and this may be perceived by those receiving services and their family/carers as having a negative impact. However, any change will be planned with the person. Changes are not necessarily as a result of this policy as reviews take place to assess changes in need. All people will continue to receive services that meet eligible needs and be given choice, and their views and individual circumstances will be taken account of when determining the options available to the person/family/carer to meet their eligible needs.</p>
<p>Sexual orientation</p>		<p><b>X</b></p>	<p>Access to adult services care and support is unlikely to be solely due to a person's sexual orientation. However, personal circumstances relating to a person's sexual orientation may have an impact on how services are delivered.</p> <p>Adult Services provide needs-led, person centred support. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers requiring care and support are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p> <p>When commissioning services, the Council will make a determination as to what interventions can best meet the person's identified assessed needs and agreed desired outcomes in a way that is equitable and sustainable, whilst offering maximum choice and control in regards to the care they receive.</p> <p>Eligibility criteria when undertaking an assessment or reassessment of a person's care and support needs take into account individual circumstances of the carer and the cared for person in order to ensure that services provide a needs-led, person centred response. Therefore the protected characteristics of those to whom the service is delivered and the needs of carers, where applicable, are considered as part of the needs assessment process and catered for in the individual's bespoke care and support plan.</p>



			<p>There is no evidence to indicate that the policy would lead to discrimination due to a person's sexual orientation. Some people may feel that there is a reduction in choice as the council will need to take into account if their needs can be met in a more cost effective way. However, all people will be offered a choice from a range of interventions including Direct Payments. In addition, people will be able to contribute to a more expensive provision, which gives more choice to those that wish and can use their own resources.</p> <p>Those people with more limited resources may not benefit from this element of the proposal and there may be a perception that they have less choice and control or see a negative impact to their finances. However, people will only be required to contribute what they are assessed as being able to as this policy does not change the Council's Fairer Charging Policy and all people will be able to contribute to their assessment and have a choice of interventions that can meet their identified eligible needs.</p> <p>This policy will not change the council's obligations to ensure people's eligible needs are met. The Council is not, however, bound to meet a need in the way preferred by an individual, particularly where the cost of that preferred way is higher than other reasonable ways.</p> <p>Some people may see a change to services following a review and this may be perceived by those receiving services and their family/carers as having a negative impact. However, any change will be planned with the person. Changes are not necessarily as a result of this policy as reviews take place to assess changes in need. All people will continue to receive services that meet eligible needs and be given choice, and their views and individual circumstances will be taken account of when determining the options available to the person/family/carer to meet their eligible needs.</p>
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**What action will be taken to improve positive or mitigate negative impacts?**

The policy's intention is to maximise choice in how individuals receive social care and support, whilst also taking the Council's resources into account when determining how to best meet a person's eligible needs to ensure services are provided on a fair and equitable basis as far as possible.

In each case where there is an assessed eligible need, the individual will be offered a care and support package or offered Direct Payments if eligible of a similar amount to be able to meet that need. Social care and support will continue to be met but anything over and above this would be expected to be funded by the individual.

All protected characteristics will be considered in line with the Social Services and Wellbeing (Wales) Act 2014, by looking at the individual circumstances of the person - and carer(s) where applicable - and how their care and support needs can be best met. As such it is not anticipated that this policy will have a negative impact based on peoples protected characteristics.

Furthermore, this policy enables the Council to make best use of its available resources, supporting the Council to be financially sustainable in order to meet the needs and demands of those requiring care and support. If the commissioned services are not suitable due to a persons protected characteristic then a direct payment can be offered where eligible or where possible an alternative commissioned.

It is acknowledged that some people may receive a change in service provision if this policy is implemented. Although the provision would continue to meet the person's needs as identified through an individual personalised assessment, an individual may perceive this as having a negative impact.

However, it should also be acknowledged that the level of care and support being received by an individual may increase.

In all cases the person will be offered a care and support package proportionate to their individual needs and offered the choice of receiving direct payments. Only those who want and are eligible for direct payments will receive them, maximising choice and control for those individuals.

By taking account of all available resources it is expected that care and support will continue to be available to a greater number of the most vulnerable citizens.

In light of the above this policy should overall have a neutral impact.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation			X	The policy's intention is to maximise choice in how individuals receive social care and support, and ensures services are provided on a fair and equitable basis as far as possible.  This policy supports the council in taking forward its statutory duties with regards to adult social services, which further it in discharging its Public Sector duties.
To advance equality of opportunity between different groups			X	
To foster good relations between different groups			X	

**What action will be taken to improve positive or mitigate negative impacts?**

The potential impact of the proposed Policy on those with eligible care and support needs on PSED has been fully considered and it has been assessed that overall this policy will have a neutral impact.

This policy supports provision of care and support tailored to meet individual’s assessed needs.

**4. Community Cohesion/Social Exclusion/Poverty**

	+	-	+/-	Why will it have this impact?
Community Cohesion			X	<p>The Policy may affect those without sufficient financial resources of their own, who may have less choice and control over the care package they receive than someone who is more financially able.</p> <p>However, we will be ensuring that service users maximise their income by promoting the uptake of benefits to which they are entitled, including Attendance Allowance, Disability Living Allowance / Personal Independence Payments, etc.</p> <p>It must be emphasised that any services received will meet the eligible assessed needs of, and agreed desired outcomes for, the individual and that the individual will have choice in regards to those services that are in line with what the Council has agreed can meet the person’s needs, whilst taking into account the Council’s available resources.</p> <p>This policy does not change the Council’s Fairer Charging Policy. As such, people will only be required to contribute what they are assessed as being able to afford in regards to having their eligible needs met. All people will be offered a service that meets eligible needs.</p>
Social Exclusion			X	
Poverty			X	

				Overall this policy should have a neutral impact as it will support the Council in ensuring that they are financially sustainable in order to be able to continue meeting ongoing demand for services, including community based services.
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**What action will be taken to improve positive or mitigate negative impacts?**

The Council's Wellbeing Objectives aim to improve the wellbeing of children, young people and adults, as well as the general wellbeing of the area, by developing the local economy and environment.

As noted above the policy should have a neutral impact.

People will be supported to maximise their income, and all people will continue to have their needs met and have a choice in how those needs will be met.

**5. Welsh**

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: - people's opportunities to use the Welsh language			X	The Council will continue to offer services in Welsh and English.

- treating the Welsh and English languages equally			X	The Council will continue to offer services in Welsh and English.
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**What action will be taken to improve positive or mitigate negative impacts?**

The Council currently has only a small number of staff with Welsh language skills working in the Directorate. However, opportunities for staff to use their language skills are promoted and training made available to those who wish to further develop their skills.

The proposals in the Policy do not include any planned reduction in human resource at the frontline. It is not therefore anticipated that they will have any effect on the service delivered to those who receive care and support from Adult Services and who wish the service they receive to be delivered through the medium of the Welsh language.

The Policy is written on the assumption that there will be no further financial or human resources available to Adult Services throughout the life of the Policy and that therefore, sustaining the current level of equality of treatment, in respect of the Welsh language, is the only realistically achievable aim.

Opportunities for staff to use their language skills will continue to be promoted and training will continue to be made available to those who wish to further develop their skills.

Contracts for commissioned services contain clauses to ensure the provider delivers services in line with the Welsh Language Act.

People will be supported to employ Welsh speaking Personal Assistants in line with their language needs.

## 6. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			X	It is not expected that the policy will have any adverse effect on biodiversity or ecosystem resilience.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			X	

**What action will be taken to improve positive or mitigate negative impacts?**

Not applicable.

## 7. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. <b>Long term</b> – looking at least 10 years (and up to 25 years) ahead	This is one of a range of policies which aim to improve fairness of access to services, as well as the long term sustainability of service provision in line with the Social Services and Well-being (Wales) Act 2014 and the Well-being of Future Generations (Wales) Act 2015.
ii. <b>Prevention</b> – preventing problems occurring or getting worse	Tailoring services to individual's needs will help improve independence and prevent or reduce the need for more complex care.
iii. <b>Collaboration</b> – working with other services internal or external	This policy enables people to have more choice in how and who delivers their care and support.
iv. <b>Involvement</b> – involving people, ensuring they reflect the diversity of the population	Various staff representatives have been involved in the development of the draft policy, including social workers and managers, Finance and Legal.
v. <b>Integration</b> – making connections to maximise contribution to:	The aim of the Direct Payments Policy is to meet individual's assessed needs and maximise their choice and control over how those needs are met.
<b>Council's well-being objectives</b>	To improve the well-being of all adults who live in the county borough. To develop the economy and the environment so that the well-being of people can be improved.
<b>Other public bodies objectives</b>	Create safe, confident and resilient communities, focusing on vulnerable people. Encourage Ageing Well.



## 8. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

Ongoing consideration of equality impact will continue to be given as the Policy is implemented. This will be monitored through the complaints process, information from social worker reviews and safeguarding referrals.

Any unintended/unforeseen negative impact on those in receipt of care and support services, identified as part of these processes, will be the subject of further impact assessment to understand opportunity to mitigate wherever possible.

We will thereby ensure that any emerging unintended/unforeseen negative impact on those who are in receipt of services, which was not previously considered, is acknowledged and acted upon appropriately.

Any such further completed impact assessment will be brought to the attention of Members, as part of the ongoing review process recommended in the Policy, to ensure these inform decisions which have had due regard to the Council's legal obligations.

The outcome of any such assessment will be routinely included in the next annual progress report to Members, or reported on sooner if the assessment outcome is significant enough to justify doing so.

## 9. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	<b>Conclusion</b>
<b>Equalities</b>	<p>The policy's intention is to maximise choice in how individuals receive social care and support, whilst also taking the Council's resources into account when assessing an individual's eligible needs to ensure services are provided on a fair and equitable basis as far as possible.</p> <p>In each case where there is an assessed eligible need, the individual will be offered a care and support package or offered Direct Payments if eligible of a similar amount to be able to meet that</p>

	<p>need. Social care and support will continue to be met but anything over and above this would be expected to be funded by the individual.</p> <p>All protected characteristics will be considered in line with the Social Services and Wellbeing (Wales) Act 2014, by looking at the individual circumstances of the person - and carer(s) where applicable - and how their care and support needs can be best met. As such it is not anticipated that this policy will have a negative impact based on peoples protected characteristics.</p> <p>Furthermore, this policy enables the Council to make best use of its available resources, supporting the Council to be financially sustainable in order to meet the needs and demands of those requiring care and support. If the commissioned services are not suitable due to a persons protected characteristic then a direct payment can be offered where eligible or where possible an alternative commissioned.</p> <p>It is acknowledged that some people may receive a change in service provision if this policy is implemented. Although the provision would continue to meet the person’s needs as identified through an individual personalised assessment, an individual may perceive this as having a negative impact.</p> <p>However, it should also be acknowledged that the level of care and support being received by an individual may increase.</p> <p>In all cases the person will be offered a care and support package proportionate to their individual needs and offered the choice of receiving direct payments. Only those who want and are eligible for direct payments will receive them, maximising choice and control for those individuals.</p> <p>By taking account of all available resources it is expected that care and support will continue to be available to a greater number of the most vulnerable citizens.</p> <p>In light of the above this policy should overall have a neutral impact.</p>
<p><b>Community Cohesion/ Social Exclusion/Poverty</b></p>	<p>The potential impact of the proposed Policy on those with eligible care and support needs on PSED has been fully considered and it has been assessed that overall this policy will have a neutral impact.</p>

	This policy supports provision of care and support tailored to meet individual's assessed needs.
<b>Welsh</b>	<p>The Council currently has only a small number of staff with Welsh language skills working in the Directorate. However, opportunities for staff to use their language skills are promoted and training made available to those who wish to further develop their skills.</p> <p>The proposals in the Policy do not include any planned reduction in human resource at the frontline. It is not therefore anticipated that they will have any effect on the service delivered to those who receive care and support from Adult Services and who wish the service they receive to be delivered through the medium of the Welsh language.</p> <p>The Policy is written on the assumption that there will be no further financial or human resources available to Adult Services throughout the life of the Policy and that therefore, sustaining the current level of equality of treatment, in respect of the Welsh language, is the only realistically achievable aim.</p> <p>Opportunities for staff to use their language skills will continue to be promoted and training will continue to be made available to those who wish to further develop their skills.</p> <p>Contracts for commissioned services contain clauses to ensure the provider delivers services in line with the Welsh Language Act.</p> <p>People will be supported to employ Welsh speaking Personal Assistants in line with their language needs.</p>
<b>Biodiversity</b>	It is not expected that the policy will have any adverse effect on biodiversity or ecosystem resilience.
<b>Well-being of Future Generations</b>	The policy contributes to the long term sustainability of service provision.

## Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

The purpose of the policy is to maximise choice in how individuals receive social care and support, whilst also taking the Council's resources into account when assessing an individual's eligible needs to ensure services are provided on a fair and equitable basis as far as possible.

This is one of a range of policies which aim to improve fairness of access to services, as well as the long term sustainability of services in line with the Social Services and Well-being (Wales) Act 2014 and the Well-being of Future Generations (Wales) Act 2015 to meet the outcomes of a growing population with social care and support needs.

## 10. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Put robust digital systems in place to improve data collection against all protected characteristics.	Head of Adult Services	Annually from 2025	Improved equalities data collection systems are in place.
Continue to promote opportunities for staff to use their Welsh language skills	Head of Adult Services	Annually from 2025	There is at least no reduction in the number of staff able to deliver the Council's Adult

and make available training for those who wish to further develop their skills.			Services through the medium of the Welsh language. Enable staff to attend Welsh language training.
As the Policy is implemented, complete further IIAs in respect of any emerging unintended/unforeseen impact and include them in annual monitoring reports to Members.	Strategic Planning Manager	Annually from 2025	The overall impact of the Policy on all those receiving care and support from Adult Services remains positive.

### 11. Sign off

	Name	Position	Signature	Date
<b>Completed by</b>	<b>Andrew Potts</b>	<b>Commissioning Officer</b>	<b>A Potts</b>	<b>29<sup>th</sup> May 2024</b>
<b>Signed off by</b>	<b>Angela Thomas</b>	<b>Head of Service/Director</b>	<b>A Thomas</b>	<b>20/08/2024</b>

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## NEATH PORT TALBOT COUNCIL

### Cabinet

2nd October 2024

### Report of the Head of Legal and Democratic Services – Craig Griffiths

#### Matter for Decision

#### Wards Affected: All

Public Health (Wales) Act 2017 - Special Procedures Licensing

#### Purpose of the Report

1. To seek approval from members to set an appropriate fee structure and scheme of delegated authority for the Public Health (Wales) Act 2017 ("the Act") in respect of special procedure licensing.
2. The question of whether a function is an executive function [i.e. one for Cabinet] or a Council function of the Licensing Committee, is determined by either the relevant legislation itself or by the Local Authorities (Executive Arrangements) (Functions and Responsibilities) (Wales) Regulations 2007, made by Welsh Government.
3. In this instance the Act specifically delegates certain functions to the Licensing Committee [established under Section 6 of the Licensing Act 2003], whilst being silent on other functions. This means that by virtue of Section 13 of the Local Government Act 2000, where the Act is silent, some functions, by default, become the responsibility of an Executive under a local authority's executive arrangements.

## **Executive Summary**

4. This report seeks to obtain approval from cabinet to set an appropriate fee structure and scheme of delegated authority for the Public Health (Wales) Act 2017 in respect of special procedure licensing.
5. Fees for the special procedure licensing regime have been calculated by the Special Procedures Implementation Group ("SPIG") and approved by Public Protection Wales ("PPW") to be consistently applied by local authorities across Wales.
6. Where the Act is silent on where the delegation of powers rests (and therefore defaults to an executive function), it is proposed that these powers be delegated to the Director of Strategy and Corporate Services, the Head of Legal Services, and the Legal Regulatory Manager.

## **Background**

7. The current legislative framework for Special Procedures is inadequate. The Local Government (Miscellaneous Provisions) Act 1982 ("the 1982 Act") is the primary means of enforcing standards in this sector through the application of a registration scheme. However, the requirement for local authorities to adopt this scheme is voluntary and those that have adopted it cannot refuse registration of the individual or premises unless they have been convicted of an offence under Part VIII of the 1982 Act. Importantly, the 1982 Act does not require a 'competency test' for those performing the procedures to demonstrate an appropriate knowledge of hygiene and infection control.
8. The Public Health (Wales) Act 2017 received Royal Assent on 3 July 2017. Part 4 of the act set out the requirements for a mandatory licensing scheme for practitioners carrying out 'special procedures' in Wales. The intention of the licensing scheme is to improve and sustain standards of infection prevention and control in the special procedures industry and assure the safety and health of clients and practitioners alike. The four special procedures are specified and are:
  - acupuncture (including dry needling)
  - body piercing



- electrolysis
  - tattooing (including semi-permanent make-up)
9. Section 76 of Part 4 of the Public Health (Wales) Act 2017 allows local authorities that have issued a Special Procedures Licence or an Approved Premises Certificate to charge a fee. The amount of fee to be charged by a local authority is to be determined having had regard to the costs incurred or expected to be incurred by the authority. The national fees for new application and renewal fees were endorsed by PPW in November 2023 and are based on the principles of Hemmings case law; the variation and other fees were endorsed by PPW in August 2024. As required by regulations these fees will collectively be reviewed after one year from implementation and at the end of each subsequent three-year period.
10. Total fees for practitioners and premises are divided into application fee and compliance fee which is payable once the application has been granted. The application fee covers the cost of processing the application, inspection and issuing documentation. The compliance fee is a reasonable contribution to the running of the licensing scheme, advising licence holders, following up complaints, additional inspections, and ongoing support.
11. Each local authority is required to approve fees as per the following table.

Licence Type	New	Renewal
Special Procedures Licence (3yr licence)	£203 (£159 Application £44 Compliance)	£189 (£148 Application £41 Compliance)
Approved Premises Certificate (3yr licence)	£385 (£244 Application £141 Compliance)	£345 (£204 Application £141 Compliance)

Special Procedure Licence Variation (Add Procedure)	£131
Special Procedure Licence Variation (Change of Detail)	£26
Replacement Licence	£13
Temporary Special Procedure licence	£92
Special Procedure approved premises variation (Add Procedure)	£189
Approved Premises Variation (Structural Change)	£189
Approved Premises - Change of Detail	£26
Replacement Licence	£13
Approved Premises Temporary Approval (Ancillary Event)	£385

Approved Premises Temporary Approval (Convention / Main Purpose)	£680
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## Delegated Authority

12. In order to deal efficiently with applications and enforcement, it is proposed that the powers listed below be delegated to:
- The Director of Strategy and Corporate Services and the Director of Environment,
  - The Head of Legal and Democratic Services and the Head of Planning and Public Protection,
  - The Legal Regulatory Manager, the General Environmental Health Manager and the Trading Standards, Food and Health Protection Manager.
13. Section 61(1) - Power to designate an individual performing a special procedure to be licensed.  
Section 65(3) - Power to issue a Special Procedures Licence where all the applicable licensing criteria is met.  
Section 67 - Power to renew a Special Procedures Licence where all the applicable licensing criteria is met.  
Section 70(1) - Power to issue an approval certificate for a premises or vehicle.  
Section 70(1) - Power to renew an approval certificate for a premises or vehicle.  
Section 70(1) - Power to refuse an approval certificate for a premises or vehicle.  
Section 72(4) - Power to take reasonable steps for bringing a voluntary termination notice to the attention of appropriate persons.  
Section 77(2) - Power to issue a stop notice.  
Section 78(1) - Power to issue a remedial action notice in respect of a Special Procedures Licence.

Section 79(1) - Power to issue a remedial action notice in respect of an Approved Premises Certificate.

Section 80(2) - Power to issue a completion certificate in respect of a Special Procedure Licence or an Approved Premises Certificate.

Section 97 - Power to carry out enforcement action and consultation in respect of intimate piercing.

Schedule 3 Paragraph 15(3) - Power to issue a warning notice.

14. The officers specified at paragraph 13 above be deemed authorised officers for the purposes of Sections 98 to 107 and shall have the power to nominate any supplementary officers as appropriate.

## **Financial Implications**

15. The national fees concerning the new licensing scheme have been calculated based on the principles of cost recovery. As required by regulations these fees will collectively be reviewed after one year from implementation and at the end of each subsequent three-year period. The licence fees can be adjusted where a deficit or surplus is identified which is in accordance with the case law R(on the application of Hemmings(t/a Simply Pleasures Ltd) and others) v Westminster City Council [2015].

## **Integrated Impact Assessment**

16. This report is only to approve an appropriate fee structure and scheme of delegated authority for the Public Health (Wales) Act 2017 in respect of special procedure licensing. An integrated impact assessment is therefore considered unnecessary.

## **Legal Impacts**

17. The Public Health (Wales) Act 2017 will place a statutory duty on local authorities in Wales to administer and enforce the special procedures licensing scheme. To ensure that the Local Authority can fulfil this statutory obligation efficiently, an appropriate fee structure and scheme of delegated powers is required to be adopted.

## Risk Management

18. Not Applicable

## Consultation

19. There is no requirement under the constitution for external consultation on this item.

## Recommendation

20. It is recommended that members approve the proposed fee structure as set out in the table at paragraph 21 below and the scheme of delegated powers set out at paragraphs 22 and 23 below.

21. Table of proposed fees.

Licence Type	New	Renewal
Special Procedures Licence (3yr licence)	£203 (£159 Application £44 Compliance)	£189 (£148 Application £41 Compliance)
Approved Premises Certificate (3yr licence)	£385 (£244 Application £141 Compliance)	£345 (£204 Application £141 Compliance)
Special Procedure Licence Variation (Add Procedure)	£131	

Special Procedure Licence Variation (Change of Detail)	£26
Replacement Licence	£13
Temporary Special Procedure licence	£92
Special Procedure approved premises variation (Add Procedure)	£189
Approved Premises Variation (Structural Change)	£189
Approved Premises - Change of Detail	£26
Replacement Licence	£13
Approved Premises Temporary Approval (Ancillary Event)	£385
Approved Premises Temporary Approval (Convention / Main Purpose)	£680

22. In order to deal efficiently with applications and enforcement, it is proposed that the powers listed below be delegated to:

- The Director of Strategy and Corporate Services and the Director of Environment,
  - The Head of Legal and Democratic Services and the Head of Planning and Public Protection,
  - The Legal Regulatory Manager, the General Environmental Health Manager and the Trading Standards, Food and Health Protection Manager.
23. Section 61(1) - Power to designate an individual performing a special procedure to be licensed.  
 Section 65(3) - Power to issue a Special Procedures Licence where all the applicable licensing criteria is met.  
 Section 67 - Power to renew a Special Procedures Licence where all the applicable licensing criteria is met.  
 Section 70(1) - Power to issue an approval certificate for a premises or vehicle.  
 Section 70(1) - Power to renew an approval certificate for a premises or vehicle.  
 Section 70(1) - Power to refuse an approval certificate for a premises or vehicle.  
 Section 72(4) - Power to take reasonable steps for bringing a voluntary termination notice to the attention of appropriate persons.  
 Section 77(2) - Power to issue a stop notice.  
 Section 78(1) - Power to issue a remedial action notice in respect of a Special Procedures Licence.  
 Section 79(1) - Power to issue a remedial action notice in respect of an Approved Premises Certificate.  
 Section 80(2) - Power to issue a completion certificate in respect of a Special Procedure Licence or an Approved Premises Certificate.  
 Section 97 - Power to carry out enforcement action and consultation in respect of intimate piercing.  
 Schedule 3 Paragraph 15(3) - Power to issue a warning notice.

The officers specified at paragraph 23 above be deemed authorised officers for the purposes of Sections 98 to 107 and shall have the power to nominate any supplementary officers as appropriate.

## **Implementation of Decision**

24. The decision is proposed for implementation after the 3-day call in period.

## **Appendices**

25. Not Applicable

## **List of Background Papers**

26. None

## **Officer Contact**

27. Craig Griffiths  
Head of Legal and Democratic Services  
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Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## **NEATH PORT TALBOT COUNCIL**

### **CABINET**

2 October 2024

### **Report of the Chief Executive**

#### **Matter for Decision**

**Wards Affected:** All

#### **Consultation on 2026 Review of Senedd constituencies (Initial Proposals)**

#### **Purpose of the Report**

To note the submission of a response to the Democracy and Boundary Commission Cymru consultation on the 2026 Review of Senedd constituencies (initial proposals).

#### **Background**

The Democracy and Boundary Commission Cymru is responsible for reviewing Senedd constituency boundaries in Wales.

In September 2023, the Welsh Government announced a bill to amend the current Senedd constituencies. The Senedd Cymru (Members and Elections) Bill was introduced on 18 September 2023 receiving royal assent on 24 June 2024.

Because of the new legislation, the Commission is required to create 16 new Senedd constituencies by combining two contiguous UK Parliamentary constituencies.

Each constituency will be represented by six Members of the Senedd, bringing the total number of members to 96.

This review must be completed by 1 April 2025, and will use the 32 new Parliamentary constituencies in order to create the 16 new Senedd constituencies.

The recommendations put forward by the Commission on completion of the review will be implemented directly via the 'automaticity' rule. As such, the recommendations will not require Senedd approval. The final decisions must be implemented as set out in the Commission's final report.

### **Initial Proposals**

The Commission published its initial proposals on 3 September, 2024. Members of the public, groups and organisations have until 30 September 2024 to submit any written responses.

As part of the review the Commission will look carefully at all representations it receives to see if the initial proposals can be amended or improved. However, it is important to note that the Commission will have to balance the issues raised in representations against all other factors, as well as the constraints set out in the legislation.

### **Statutory Factors**

Schedule 2 of the act specifies a number of specific factors that the Commission may take into account as it develops proposals and recommendations for Senedd constituencies. Specifically, the Commission may consider:

- Local government boundaries that existed on the review date.
- Special geographical considerations, including in particular, the size, shape and accessibility of a proposed Senedd constituency.
- Any local ties that would be broken by the proposed pairings.

## **Local Government Boundaries**

The Commission defines local government boundaries in Wales as the boundaries of counties, county boroughs, electoral wards, communities and community wards. However, for the purposes of the 2026 Review the Commission is only concerned with the existing UK parliamentary constituencies.

## **Special Geographical Considerations**

In terms of special geographical considerations that may impact on the Senedd constituency boundaries the Commission believes this will primarily relate to physical geography – such as mountains, hills, lakes, rivers, estuaries and islands – rather than human or social geography.

Matters of culture, history, socioeconomics and other possible aspects of non-physical geography (such as road links) are more likely to arise as issues when considering the separate factor of local ties.

## **Local Ties**

With regard to local ties the Commission considers that existing boundaries are likely to have been created in recognition of local ties, and are therefore likely to reflect local ties.

The Commission's policy is therefore not to divide existing communities when it develops proposals and recommendations for Senedd constituencies, unless there is no other available solution that would enable compliance with the statutory electorate range.

However, for the purposes of the 2026 Review the Commission will only be able to consider the existing UK parliamentary constituencies.

It also has to be noted that the Commission is an independent and impartial body. As such, existing voting patterns and the prospective fortunes of political candidates do not enter its considerations during a review.

## **Boundary Naming**

In making its proposals and recommendations, the act also requires the Commission to specify a name and designation for each proposed constituency.

Each constituency in Wales must have a single monolingual name, unless the Commission consider doing so would be unacceptable in which case they must propose different names in both Welsh and English.

## **Designating**

Under the new act each constituency must be designated as either a 'county constituency' or a 'borough constituency'. The Commission considers that, as a general principle, where constituencies contain more than a small rural element, they should normally be designated as county constituencies. In other cases, they should be designated as borough constituencies.

## **The Initial Proposals**

### **Brecon, Radnor, Neath and Swansea East**

The commission proposes that a county constituency be created by combining the:

- Brecon, Radnor and Cwm Tawe UK Parliamentary constituency and the:
- Neath and Swansea East UK Parliamentary constituency

It is the view of the Commission that there are good road links between the two areas and by pairing these Parliamentary constituencies they would be uniting areas that form part of the Neath Port Talbot principal council area into one constituency by building on the established links that exist.

The Brecon, Radnor and Cwm Tawe constituency was one of the more contentious UK Parliamentary constituencies with many suggesting that the Cwm Tawe region should have been in a UK Parliamentary constituency with areas of Neath or Swansea.

It is the Commission's belief that the proposal would see the Cwm Tawe area combined with areas of both Neath and Swansea believing that this would create a cohesive constituency.

## **Electoral Ward Splits**

Due to certain changes brought about by previous local Electoral Arrangement Orders the Commission also highlighted certain electoral wards that would need to be split between the proposed new Senedd constituencies. This would include:

The electoral ward of Clydach which would be split across **Brecon, Radnor, Neath and Swansea East** and the proposed constituency of **Swansea West and Gower**.

The electoral ward of Cimla and Pelenna would be split across **Brecon, Radnor, Neath and Swansea East** and the proposed constituency of **Aberafan Maesteg, Rhondda and Ogmores**.

### **Name of constituency**

The Commission also proposed the Welsh language name of **Aberhonddu, Maesyfed, Castell-nedd a Dwyrain Abertawe** for the **Brecon, Radnor, Neath and Swansea East** constituency.

It is thought this is a suitable alternative to merely combining the UK Parliamentary constituency names would make for an unnecessarily unwieldy name.

### **Aberafan Maesteg, Rhondda and Ogmores**

In relation to the above constituency the Commission have proposed pairing the:

- Aberafan Maesteg UK Parliamentary constituency and the:
- Rhondda and Ogmores UK Parliamentary constituency

In terms of this proposal the Commission's view was that there are good road links between the two areas and by pairing these UK Parliamentary constituencies they would be reuniting areas that form part of the Bridgend principal council area into one constituency by building on the established links that exist.

### **Electoral Ward Splits**

Similar to the Brecon, Radnor, Neath and Swansea East constituency certain electoral ward changes brought about by previous local Electoral Arrangement Orders have been highlighted by the Commission. These include:

The electoral ward of Cimla and Pelenna which would be split across **Aberafan Maesteg, Rhondda and Ogmores** and the proposed constituency of **Brecon, Radnor, Neath and Swansea East**.

The electoral ward of Pyle, Kenfig Hill and Cefn Cribwr which would be split across **Aberafan Maesteg, Rhondda and Ogmore** and the proposed constituency of **Vale of Glamorgan and Bridgend**.

### **Name of constituency**

The Commission also proposed the Welsh language name of Aberafan Maesteg, Rhondda ac Ogwr for the **Aberafan Maesteg, Rhondda and Ogmore** constituency.

It is thought this is a suitable alternative to merely combining the UK Parliamentary constituency names would make for an unnecessarily unwieldy name.

### **Comments – Initial Proposals**

In response to the Commission's request for comments regarding their initial proposals published on 3 September, 2024, the following 'points of principle' have been put forward for consideration.

The commentary as outlined below in relation to the proposed new Senedd constituencies was agreed by the four main political groups prior to the Commission's 30 September submission deadline and is expected to be endorsed by Cabinet at its meeting on 4 October, 2024.

The particular Senedd constituency pairings of relevance to this local authority are:

#### **Aberafan Maesteg, Rhondda and Ogmore**

#### **Brecon, Radnor, Neath and Swansea East**

Given the radical nature of the proposals, it is understood that the Commission have had an invidious task in selecting the relevant UK parliamentary constituencies to be combined.

Nevertheless, while it is acknowledged that the recommendations do allow for reunification of certain parts of the Neath Port Talbot and Bridgend principal council areas, regrettably they have also ended up creating enlarged boundaries which simply do not reflect natural community or economic ties and are not easily recognisable for local electors.

Looking first at the proposed Brecon, Radnor, Neath and Swansea East Senedd constituency.

As part of this Council's previous consultation responses to the UK Parliamentary Boundary Review it has long been argued that the communities of the Upper Amman and Swansea Valley should always have formed part of areas of Neath or Swansea and should not have formed part of the Brecon, Radnor and Cwm Tawe constituency.

While it is clear the Commission's intention was to resolve this anomaly, the solution offered creates a larger problem with a 'super' constituency encompassing a huge area of both urban and rural communities of vastly different demographics that offers no proper sense of community ties, identity or place.

It is acknowledged that there are suitable road links along with regular public transport connections between Neath Town Centre and the Brecon area. However, if you travel further north to towns and villages in and around Builth Wells or Llandrindod Wells public transport options become far more limited. The time required to travel between such areas even by the most direct routes, excluding public transport, averages between 2-3 hours on non-motorway roads.

Coupled to the concerns around the size of the constituency, the council also felt it important to highlight the added complexity that creating new Senedd constituencies will generate.

The Commission's initial proposals, if adopted will result in significant cross-boundary overlap with neighbouring local authorities in the north and east.

This will result in electoral administrative co-ordination across three local authorities having to collaborate (excluding any additional logistic co-ordination required in other constituencies located with the principal council areas).

Turning to the proposals for the Aberafan Maesteg, Rhondda and Ogmore Senedd constituency.

As outlined in the Commission's report it is stated that good road links exist between the two areas. However, while we concur that such road links do exist we would not agree that such links are sufficiently robust.

To provide one simple example the most direct and only connecting road between Port Talbot and Treorchy would be the A4107 across the Bwlch Mountain.

This single mountain road is occasionally subject to road closures due to poor weather conditions, particularly in the winter months, and has no specific public transport connections. In terms of direct connectivity, far better links exist between Port Talbot and Bridgend with access to the M4 motorway.

In addition, while reference is made to a shared sense of character between the valley communities of Maesteg, Pontycymmer and Ogmore it is highlighted that there is little in the way of community connection between the larger community areas of Aberafan and Rhondda.

Aberafan electors tend to be more westward facing with strong links with communities in the Neath, Swansea, Bridgend and other surrounding coastal areas. Alternatively electors residing in Rhondda arguably have stronger eastward connections with communities in and around Cardiff and the Valleys.

### **Concluding remarks**

It is the council's strong belief that the most natural combination for electors living in the Neath and Swansea East UK parliamentary constituency remains with electors residing in the Aberafan Maesteg UK parliamentary constituency.

These two constituencies form the vast majority of the Neath Port Talbot principal council area, encompassing some overlap with neighbouring authorities in the East and West and with the exclusion of the Cwm Tawe area in the north, but have started to bed down following the recent UK Parliamentary General Election in July 2024.

In the event that such a pairing proves problematic for the Commission to implement, we would offer a supplementary recommendation to combine the Aberafan Maesteg constituency with the Bridgend constituency.

The council views this combination, while not being perfect, as offering a far more appropriate pairing with communities with stronger cultural and economic ties along with much more robust transport links.



Undoubtedly, these initial proposals will result in significant confusion and misunderstanding for local electors who will no longer be able to easily identify or establish who represents them which may also diminish engagement with the democratic process.

In turn this will inevitably lead to difficulties in the administration of electoral events with overly complex multiple cross-boundary issues and the potential high risk of administrative failure in the event of any future combined electoral events where different boundary types will be in effect. We ask the Commission to take full consideration of these supplementary impacts now and during future reviews.

Overall, the Council believes that any boundary alteration proposals should be for change that is desirable, effective and convenient for local communities.

On that basis, it is felt that these initial proposals will regrettably be inconvenient for the electorate and increase the complexity and risk of administrative error in the running of elections.

In addition, members of Council have also expressed their concern over the added layers of complexity newly elected representatives will face in advocating for constituents across multiple principal councils, health boards, police forces and rescue services.

It is understood that the remit of the Commission in undertaking the current 2026 Senedd constituencies review is exceptionally restricted which may limit the ability to offer alternative combination pairings.

Nevertheless, we would question whether the voter is actually being placed at the heart of the democratic process and request that the Commission acknowledge the significant concerns over the current initial proposals.

Any future review, where greater flexibility is afforded, must give careful consideration to the current proposed constituency combinations, particularly the disconnected and detached communities in the Cwm Tawe and Ogmore areas.

The aim must be to restore the traditional community ties in these areas established over the past century but regrettably diminished by the recommendations made as part of the UK Parliamentary Review and further exacerbated by the current Senedd Constituencies Review.

## **Comment on naming and designations of Senedd constituencies**

In relation to the naming and designation of constituencies, the Council will reserve comment until publication of the revised proposals.

## **Financial Impacts**

Members are advised that the implementation of new Senedd boundaries could potentially require additional financial resources to enable electoral services to administer this significant change in election arrangements. These are not quantified at present and will be supported by grant funding from Welsh Government.

## **Integrated Impact Assessment**

There are currently no direct implications arising from the recommendations in this report.

## **Valleys Communities Impacts**

There are no direct valley community impacts as a result of the recommendations set out in this report which relate to a response to a consultation only.

## **Workforce Impacts**

There are currently no direct work force impacts as a result of the recommendations set out in this report.

## **Legal Impacts**

There are currently no direct legal impacts as a result of the recommendations set out in this report.

## **Risk Management Impacts**

There are no direct implications from the recommendations in this report.

## **Consultation**

There is no requirement to externally consult in preparing the draft response to the Democracy and Boundary Commission Cymru's consultation exercise.

## **Recommendation**

It is recommended that Members note the response included at Appendix 1.

### **Reasons for Proposed Decision**

To note the response to the Democracy and Boundary Commission Cymru's open consultation on the 2026 Review of Senedd constituencies (initial proposals).

### **Implementation of Decision**

In consultation with the scrutiny chairperson it is requested that the implementation be for immediate effect.

### **Appendices**

Appendix 1 – Draft response in relation to 2026 Review of Senedd Constituencies (Initial Proposals).

### **List of Background Papers**

[Democracy and Boundary Commission Cymru – Initial Proposals](#)

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## **Appendix 1**

### **Democracy and Boundary Commission Cymru**

#### **Consultation Response – Neath Port Talbot Council**

In response to the Commission's request for comments regarding their initial proposals published on 3 September, 2024, the following 'points of principle' have been put forward for consideration.

The commentary as outlined below in relation to the proposed new Senedd constituencies was agreed by the four main political groups prior to the Commission's 30 September submission deadline and is expected to be endorsed by Cabinet at its meeting on 4 October, 2024.

The particular Senedd constituency pairings of relevance to this local authority are:

#### **Aberafan Maesteg, Rhondda and Ogmore**

#### **Brecon, Radnor, Neath and Swansea East**

Given the radical nature of the proposals, it is understood that the Commission have had an invidious task in selecting the relevant UK parliamentary constituencies to be combined.

Nevertheless, while it is acknowledged that the recommendations do allow for reunification of certain parts of the Neath Port Talbot and Bridgend principal council areas, regrettably they have also ended up creating enlarged boundaries which simply do not reflect natural community or economic ties and are not easily recognisable for local electors.

Looking first at the proposed Brecon, Radnor, Neath and Swansea East Senedd constituency.

As part of this Council's previous consultation responses to the UK Parliamentary Boundary Review it has long been argued that the communities of the Upper Amman and Swansea Valley should always have formed part of areas of Neath or Swansea and should never have formed part of the Brecon, Radnor and Cwm Tawe constituency.

While it is clear the Commission's intention was to resolve this anomaly, the solution offered essentially creates a larger problem with a 'super' constituency encompassing a huge area of both urban and rural communities of vastly different demographics that offers no proper sense of community ties, identity or place.

It is acknowledged that there are suitable road links along with regular public transport connections between Neath Town Centre and the Brecon area. However, if you travel further north to towns and villages in and around Builth Wells or Llandrindod Wells public transport options become far more limited. The time required to travel between such areas even by the most direct routes, excluding public transport, averages between 2-3 hours on non-motorway roads.

Coupled to the concerns around the size of the constituency, the council also felt it important to highlight the added complexity that creating new Senedd constituencies will generate.

The Commission's initial proposals, if adopted will result in significant cross-boundary overlap with neighbouring local authorities in the north, east.

This will result in electoral administrative co-ordination across three local authorities having to collaborate forensically (excluding any additional logistic co-ordination also required in other constituencies located with the principal council areas).

Turning to the proposals for the Aberafan Maesteg, Rhondda and Ogmore Senedd constituency.

As outlined in the Commission's report it is stated that good road links exist between the two areas. However, while we concur that such road links do exist we would not agree that such links are sufficiently robust.

To provide one simple example the most direct and only connecting route between Port Talbot and Treorchy would be the A4107 across the Bwlch Mountain.

This single mountain road is occasionally subject to road closures due to poor weather conditions, particularly in the winter months, and has no specific public transport connections. In terms of direct connectivity, far better links exist between Port Talbot and Bridgend with access to the M4 motorway.

In addition, while reference is made to a shared sense of character between the valley communities of Maesteg, Pontycymmer and Ogmore it is highlighted that there is little in the way of community connection between the larger community areas of Aberafan and Rhondda.

Aberafan electors tend to be more westward facing with strong links with communities in the Neath, Swansea and other southern coastal areas. Alternatively electors residing in Rhondda arguably have stronger eastward connections with communities in and around Cardiff and the Valleys.

### **Concluding remarks**

It is the council's strong belief that the most natural combination for electors living in the Neath and Swansea East UK parliamentary constituency remains with electors residing in the Aberafan Maesteg UK parliamentary constituency.

These two constituencies form the vast majority of the Neath Port Talbot principal council area, encompassing some overlap with neighbouring authorities in the east and west and with the exclusion of the Cwm Tawe area in the north, but it is acknowledged have started to bed down following the recent UK Parliamentary General Election in July 2024.

In the event that such a pairing proves problematic for the Commission to implement, we would offer a supplementary recommendation to combine the Aberafan Maesteg constituency with the Bridgend constituency.

The council views this combination, while in no way being perfect, as offering a far more appropriate pairing with communities with stronger cultural and economic ties along with much more robust transport links.

Undoubtedly, these initial proposals will result in significant confusion and misunderstanding for local electors who will no longer be able to easily identify or establish who represents them which may also diminish engagement with the democratic process.

In turn this will inevitably lead to difficulties in the administration of electoral events with overly complex multiple cross-boundary issues and the potential high risk of administrative failure in the event of any future combined electoral events where different boundary types will be in effect. We ask the Commission to take full consideration of these supplementary impacts now and during future reviews.

Overall, the Council believes that any boundary alteration proposals should be for change that is desirable, effective and convenient for local communities.

On that basis, it is felt that these initial proposals will regretfully be inconvenient for the electorate and increase the complexity and risk of administrative error in the running of elections.

In addition, members of Council have also expressed their concern over the added layers of complexity newly elected representatives will face in advocating for constituents across multiple principal councils, health boards, police forces and rescue services.

It is understood that the remit of the Commission in undertaking the current 2026 Senedd constituencies review is exceptionally restricted which may limit the ability to offer alternative combination pairings.

Nevertheless, we would question whether the voter is being placed at the heart of the democratic process and request that the Commission acknowledge the significant concerns over the current initial proposals.

Any future review, where greater flexibility is afforded, must give careful consideration to the current proposed constituency combinations, particularly the disconnected and detached communities in the Cwm Tawe and Ogmore areas.

The aim must be to restore the traditional community ties in these areas established over the past century but regretfully diminished by the recommendations made as part of the UK Parliamentary Review and further exacerbated by the current Senedd Constituencies Review.

### **Comment on naming and designations of Senedd constituencies**

In relation to the naming and designation of constituencies, the Council will reserve comment until publication of the revised proposals.





## NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

### Cabinet

2<sup>nd</sup> October 2024

**DIRECTOR OF EDUCATION,  
LEISURE AND LIFELONG LEARNING  
ANDREW THOMAS**

### **MATTER FOR MONITORING**

**WARDS AFFECTED:** All

### **WELSH IN EDUCATION STRATEGIC PLAN 2022-2032**

#### **Purpose of report**

1. To report on progress of Neath Port Talbot's Welsh in Education Strategic Plan 2022-2032.

#### **Executive summary**

2. Section 84 of The School Standards and Organisation Act 2013 requires Local Authorities to prepare a Welsh in Education Strategic Plan (WESP).
3. Neath Port Talbot's WESP details the plan to support and further develop Welsh language education in schools and in the wider communities and planning for future growth. The plan details how further development will be secured over the next 10 years, January 2022 - January 2032.
4. This report details the progress made in the second year of implementing the plan (Appendix A- Annual Review) and targets for the next 5 years (Appendix B- Five Year Plan).

## Background

5. Section 84 of The School Standards and Organisation Act 2013 requires Local Authorities to prepare a Welsh in Education Strategic Plan (WESP- Appendix C). The WESP must contain proposals and targets to improve the:
  - Planning and standards of Welsh medium education and teaching; and
  - Report on progress made to meet the targets of the previous WESP.
  
6. Neath Port Talbot's WESP 2022-32, is the cornerstone for the Council's vision for increasing and improving the planning of the provision of Welsh medium education in Neath Port Talbot, to enable all learners to develop their Welsh language skills and to use the language confidently in everyday life. It both complements and assists in facilitating the National vision for the Welsh language, to have 1 million Welsh speakers by 2050:

*The year 2050: The Welsh language is thriving, the number of speakers has reached a million, and it is used in every aspect of life. Among those who do not speak Welsh there is goodwill and a sense of ownership towards the language and a recognition by all of its contribution to the culture, society, and economy of Wales. Our vision is to secure favourable circumstances throughout the country that support language acquisition and use of Welsh language skills. We want to see an increase in language transmission in the family, early introduction of Welsh to every child, an education system that provides Welsh language skills for all*

### **Cymraeg 2050 – A million Welsh speakers (Welsh Government, 2017)**

7. Welsh-medium education is an integral and essential part of the learning offer in Neath Port Talbot and all children should benefit from the opportunity to learn, appreciate and understand their lives through the medium of Welsh. This principle is underpinned by ensuring universal access to this provision across the county borough. Neath Port Talbot Council recognises that language and culture are critical parts of an individual's identity and is committed to promoting and celebrating Welsh language learning across all phases and sectors.

8. It is acknowledged that the statutory education system has a vital role to play in increasing the number of Welsh speakers. We must increase the number of school learners who have the opportunity to develop Welsh-language skills in school and the opportunity to use it in their everyday lives, significantly, to achieve our goals.
9. Neath Port Talbot's WESP details how we plan to support and further develop Welsh language education in schools and in the wider communities and how we plan for future growth. The plan details how we will secure further development over the next 10 years, January 2022 - January 2032.
10. The plan has been developed through close working with partners including Neath Port Talbot schools, Menter Iaith, RhAG, Mudiad Meithrin, Neath Port Talbot College, Academi Hywel Dda Swansea University, the Urdd and with Welsh Government.
11. It aligns itself to the national policy and guidance '*The Welsh in Education Strategic Plan (Wales) Regulations 2019*', '*Cymraeg 2050*' and to the '*Education in Wales: Our National Mission, Action Plan 2017-21*'. The plan reflects how the school system in Neath Port Talbot, including sixth forms, will move forward in the period until 2032 to ensure that the new curriculum is implemented effectively in our schools securing the opportunity and 'desire for learners to become increasingly bilingual with a strong grasp of other languages' (*Curriculum for Wales 2022*).
12. The overarching ten year target in Neath Port Talbot is to increase the number of Year 1 children taught through the medium of Welsh from 16.8% (252 pupils) in 2020/21 (PLASC 2021) to 31% (460 pupils) by 2032.
13. Neath Port Talbot's WESP (Appendix C) contains information on increasing community use of the Welsh language. This is further developed in the WLGA grant action plan- *Funding for county councils to support the Welsh language in Carmarthenshire and the former industrial heartland areas of the Western Valleys* (Appendix D).

## **WESP Outcomes**

14. The following outcomes are outlined in the WESP and address the broader aims outlined in Cymraeg 2050 and its implementation plan.

- More nursery children/3 year olds receive their education through the medium of Welsh
- More reception class children/ 5 year olds receive their education through the medium of Welsh
- More children continue to improve their Welsh language skills when transferring from one stage of their statutory education to another
- More learners study for assessed qualifications in Welsh (as a subject) and subjects through the medium of Welsh
- More opportunities for learners to use Welsh in different contexts in school.
- An increase in Welsh-medium education provision for learners with additional learning needs (in accordance with duties determined by the ALN Act
- Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh.

### **Summary of progress**

15. Key achievements over the last year include the following.

- Welsh-medium educational promotional material  
A series of 6 professional videos, 'Taith at Ddwy Iaith', have been commissioned and are ready to be launched in the Autumn term with a focus on the Welsh-medium pathways from pre-birth through to further education (both higher education and vocational pathways). The promotional material promotes the benefits of bilingualism and Welsh-medium education throughout the Local Authority. Further promotional work has been done in the form of professionally produced prospectuses, flyers and promotional banners for Welsh-medium schools, with specific emphasis on schools with surplus places and work has commenced on producing a 'Taith at Ddwy Iaith' area on the NPT website.
- Local Authority working in partnership with the National Centre for Learning Welsh to increase the Welsh speaking school workforce  
The Local Authority is currently working closely with the National Centre for Learning Welsh with the aim of transitioning one English-medium cluster along the language continuum. Currently 4 staff members from Cefn Saeson Comprehensive School are half way through the new pilot for language acquisition and have attended the first block of residential in Nant Gwrtheyrn. It is our aim to work closely with the National Centre for Learning Welsh to develop a Welsh speaking community within the Cefn Saeson feeder cluster primaries. This will ensure pupil transition and progression from primary to

secondary as well as forming a natural cluster support group for staff in both the primaries and secondary cluster schools.

- Welsh Language Promotion Officer employed full time

A Welsh Language Promotion Officer has been appointed full time until August 2025 (with the aim of continuing beyond 2025 in line with funding). One of his main objectives is to work closely with the Welsh-medium cluster to tackle surplus places in our Welsh-medium schools.

- Development of bilingual pre vocational 14-16 and vocational pathways for pupils within the Local Authority

A bilingual skills hub will be completed on the Ysgol Gymraeg Ystalyfera Bro Dur site by Summer 2025. In line with the new National 14-16 Qualifications, the hub will provide bespoke bilingual courses with the aim of improving attendance and pupil engagement. This hub will fit into the Local Authority's strategic approach to developing a wider bilingual curriculum, skills based and vocational offer for young people across NPT.

- Development of Childcare Provision- Ysgol Gymraeg Ystalyfera Bro Dur and YGG Trebannws

In order to increase pupil numbers in YGG Trebannws and Ysgol Gymraeg Ystalyfera Bro Dur primary phase, work has been done to develop, design and source funding for new childcare facilities offering wrap around provision in both schools. YGG Trebannws childcare will open in September 2024 with 13 names already on roll. The new provision in Ysgol Gymraeg Ystalyfera north is expected to open before the end of the 2024-2025 academic year. Positive parental feedback and pupil names already registered for these facilities suggest that there will be a significant increase in pupil intake in both schools in the coming years.

- Development of transition plan from KS2 to KS3 and KS4 to KS5

A transition plan for Welsh-medium KS2 to 3 and KS4 to 5 has been developed with cluster Headteachers and the Welsh Language promotion Officer with the aim of targeting schools with the greatest loss to English-medium education. The plan will be implemented and funded from LAEG grant funding.

## **Financial Impact**

16. There are no financial implications linked to this report. However, as a result of implementing targets within the plan financial impacts could occur, for example an increase in the number of Welsh-medium schools is likely to lead to increased capital and revenue costs.

17. A WLGA grant of £147,500 was awarded to support the Welsh language in Carmarthenshire and the former industrial heartland areas of the Western Valleys (Swansea Valley area). This will be spent in 2024-2025.
18. A Welsh Government Immersion Grant of £300,000 was awarded to facilitate the running of the immersion centre from September 2022-March 2025. Additional costs of running the immersion centre may be identified in March 2025 and reports will be presented to members at the appropriate time for approval.
19. Applications for grant funding have been submitted to assist with additional capital and revenue costs for identified projects through the Sustainable Communities for Learning programme and these will be the subject of further reports.
20. Additional financial impacts may be identified through the course of the 10 year plan and reports will be presented to members at the appropriate time for approval.

### **Integrated Impact Assessment**

21. An integrated impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.
22. The assessment has indicated positive impacts in relation to age, disability, race and sex; neutral impacts on the other protected characteristics and a positive impact on the development of the Welsh language. The WESP is a 10 year plan and will continue to be monitored during that period by the WESP forum members and annually by Welsh Government for any mitigating actions where necessary.
23. The Integrated Impact Assessment is attached to this report as Appendix E.

### **Valley Communities Impacts**

24. There are positive impacts on valley communities as result of this report. During implementation it is likely that the WESP will create and provide opportunities and experiences for all learners and the wider community to use Welsh and be part of Welsh life in order to increase confidence in the Welsh language and to feel a sense of belonging. The WESP aims to promote community cohesion by creating opportunities to work together towards a common aim, developing the Welsh language. Specific actions within the WESP promote community cohesion, for example, Menter Iaith's family activity sessions/ days e.g. fun days, singing sessions; The Urdd's Community Department providing arts opportunities and arranging activities to encourage and enable children and young people to socialise through the medium of Welsh outside the classroom; further development of Ty'r Gwrhyd's community groups, including Merched y Wawr, Cylch Darllen Cwm Tawe and papur bro *Llais*, and activities including regular book launches, small art exhibitions, cultural and literary events and creative activities for children and young people. These activities aim to forge good relationships between Welsh-medium and English-medium communities. This is further developed in the WLGA grant action plan- *Funding for county councils to support the Welsh language in Carmarthenshire and the former industrial heartland areas of the Western Valleys* (Appendix D).

### **Workforce impacts**

25. It is likely that there will be positive workforce impacts as a result of this report. WESP outcome 7 aims to increase the number of teaching staff able to teach Welsh (as a subjects) and teach through the medium of Welsh, which is likely to positively impact on the workforce. The opening of 3 new Welsh-medium schools within the 10 year period will also increase the number of staff teaching through the medium of Welsh within the Local Authority.

### **Legal impacts**

26. The following legislation / regulations are aligned to this report:
- Section 84 of the School Standards and Organisation (Wales) Act 2013.
  - The WESP (Wales) Regulations 2019
  - The WESP (Wales) (Amendment) (Coronavirus) Regulations 2020

## **Risk Management Impacts**

27. Failure to implement the WESP targets will mean that the Council will not be able to fulfil its legal obligations.

## **Consultation**

28. Consultation on the WESP has already taken place, there is no requirement for further external consultation.

## **Scrutiny Observations**

The item was considered at the Education, Skills and Wellbeing Scrutiny Committee on the 12<sup>th</sup> September. The Chair was very complimentary about the progress made delivering on the WESP targets. The report was noted.

## **Recommendation**

42. It is recommended that members note the content of the report on the progress of the WESP.

## **Appendices**

Appendix A: Annual Review

Appendix B: 5 Year Plan

Appendix C: Welsh in Education Strategic Plan

Appendix D: WLGA Action Plan

Appendix E: WESP IIA

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2024/v.2

# ANNUAL REVIEW REPORT WELSH IN EDUCATION STRATEGIC PLAN

2023-2024

Name of Local Authority

**Neath Port Talbot**

Author:	Kate Windsor-Brown
Approver:	Rhiannon Crowhurst
Date	12.07.24

## Introduction to the Welsh in Education Strategic Plan Review Report

As you are aware, it is a statutory requirement for you to submit your report to the Welsh Government by July 31, 2024.

We know that several of you have already started collating information using the template provided last year. We've made some minor amendments to the form and content of the template to reflect changes to Welsh Government plans, programmes or policy developments since the last reporting period. Feedback provided after the first reporting year is also reflected.

Your annual review report is used as an important information and evidence base to evaluate plans and programmes such as: Flying Start; Mudiad Meithrin's Cymraeg i Blant and Sefydlu a Symud (Set up and Succeed) programmes; E-sgol; the Anti-Racism Action Plan, Siarter Iaith/ Welsh Language Charter; the Sustainable Communities for Learning investment programme and the Welsh Language Education Workforce Plan (amongst others). The reports are also considered in relation to wider education policy and reforms e.g. duties under the Additional Learning Needs and Curriculum and Assessment Acts, as well as to inform research to evaluate learners' linguistic outcomes and prioritisation of funding needs. This template reflects those priority areas.

We will consider progress on your targets and commitments against your 5-year action plan. We are mindful to the fact that the degree and pace of progress on different aspects of your WESP will be different. The prompts in the template are to guide you rather than limit you.

### **Some issues to note**

**Use of Data:** We ask that you use local data (quantitative and qualitative) to report on your progress. We know that PLASC data will not be published in time for you to use in this report. However, you have access to the core data (which was submitted to the Welsh Government for validation in January) and we encourage you to use that to make a comparison with the data provided in your 2022-23 report.

**Local Authority Education Grant (LAEG) - Cymraeg 2050 element:** The grant guidance sets out the need for any expenditure under this element to be used to support our strategy for the Welsh language - *Cymraeg 2050: One million speakers*. You'll be expected to demonstrate alignment with your WESP (including your late immersion provision); Welsh in Education workforce plan; Curriculum for Wales; The National Framework for the Siarter Iaith and the expectations and responsibilities set out in the ALN Act and the ALN Code in relation to Welsh-medium provision.

In accordance with the conditions agreed in our *Funding Award letter in relation to the Welsh-medium Late Immersion Grant* dated 30 August 2022, you are expected to report on the progress of your late immersion projects, include your progress report from 1 April 2024 to 31 July 2024 in this annual review report. A final report,

summarising 2022-25 activity, will be expected at the end of March 2025. Thereafter, this annual review report will be the only reporting requirement on the Cymraeg 2050 element of the LAEG.

**Information about your local curricular offer:** Data on subjects offered and assessed in Welsh is collected to cross-reference with the language category of schools within your area and also to monitor progress against your 10-year WESP. Arrangements for collecting the local curricular data vary from county to county, with the data collected directly by some local authorities with others using regional education consortia to support with this work. For this reporting year, we ask you to continue with your current arrangements. We are reviewing the current arrangements with a view to introducing a more streamlined and accessible approach to collecting this data in the near future.

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## KEY ACHIEVEMENTS / HIGHLIGHTS

- Welsh-medium educational promotional material  
A series of 6 professional videos, 'Taith at Ddwy laith', have been commissioned and are ready to be launched in the Autumn term with a focus on the Welsh-medium pathways from pre-birth through to further education (both higher education and vocational pathways). The promotional material promotes the benefits of bilingualism and Welsh-medium education throughout the Local Authority. Further promotional work has been done in the form of professionally produced prospectuses, flyers and promotional banners for Welsh-medium schools, with specific emphasis on schools with surplus places and work has commenced on producing a 'Taith at Ddwy laith' area on the NPT website.
- Local Authority working in partnership with the National Centre for Learning Welsh to increase the Welsh speaking school workforce  
The Local Authority is currently working closely with the National Centre for Learning Welsh with the aim of transitioning one English-medium cluster along the language continuum. Currently 4 staff members from Cefn Saeson Comprehensive School are half way through the new pilot for language acquisition and have attended the first block of residential in Nant Gwrtheyrn. It is our aim to work closely with the National Centre for Learning Welsh to develop a Welsh speaking community within the Cefn Saeson feeder cluster primaries. This will ensure pupil transition and progression from primary to secondary as well as forming a natural cluster support group for staff in both the primaries and secondary cluster schools.
- Welsh Language Promotion Officer employed full time  
A Welsh Language Promotion Officer has been appointed full time until August 2025 (with the aim of continuing beyond 2025 in line with funding). One of his main objectives is to work closely with the Welsh-medium cluster to tackle surplus places in our Welsh-medium schools.
- Development of bilingual pre vocational 14-16 and vocational pathways for pupils within the Local Authority  
A bilingual skills hub will be completed on the Ysgol Gymraeg Ystalyfera Bro Dur site by April 2025. In line with the new National 14-16 Qualifications, the hub will provide bespoke bilingual courses with the aim of improving attendance and pupil engagement. This hub will fit into the Local Authority's strategic approach to developing a wider bilingual curriculum, skills based and vocational offer for young people across NPT.
- Development of Childcare Provision- Ysgol Gymraeg Ystalyfera Bro Dur and YGG Trebannws  
In order to increase pupil numbers in YGG Trebannws and Ysgol Gymraeg Ystalyfera Bro Dur primary phase, work has been done to develop, design and source funding for new childcare facilities offering wrap around provision in both schools. YGG Trebannws childcare will open in September 2024 with

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<p>13 names already on roll. The new provision in Ysgol Gymraeg Ystalyfera north is expected to open before the end of the 2024-2025 academic year. Positive parental feedback and pupil names already registered for these facilities suggest that there will be a significant increase in pupil intake in both schools in the coming years.</p> <ul style="list-style-type: none"> <li>• <u>Development of transition plan from KS 2 to KS3 and KS 4 to 5</u> A transition plan for Welsh-medium KS2 to 3 and KS 4 to 5 has been developed with cluster Headteachers and the Welsh Language promotion Officer with the aim of targeting schools with the greatest loss to English-medium education. The plan will be implemented and funded from LAEG grant funding.</li> </ul>
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OVERALL PLAN SUMMARY		
outcome	Target Description	Assessment
Overall	<i>Welsh Government have set a target for Neath Port Talbot to increase the number of learners accessing Welsh-medium education of between 17% and 27% over a 10 year period. This target is based on increasing the number of Year 1 children taught through the medium of Welsh from 16.8% (252 pupils) in 2020/21 (PLASC 2021) to 31% (460 pupils) by 2032. Our ambitious plan is to exceed the upper range of the target set by Welsh Government.</i>	
1	<i>Increasing the % of 3-year olds (N2) receiving their education through the medium of Welsh to 22.8%</i>	
2	<i>Increasing the % of 5-year olds receiving their education through the medium of Welsh to 21%</i>	
3	<i>By the end of the 10 year plan we will see a significant increase in the number of learners transferring from WM primary to YGYBD as well as an increase in the number of learners remaining in WM education from KS3 to KS4 (see Outcome 4). It is intended to see an increase in the number latecomers changing to WM education as a result of successful immersion, as parents become more informed and confident with WM education.</i>	<i>Immersion/ KS2 to KS3 transition</i>  <i>KS3 to KS4 transition</i>
4	<i>By the end of the 10 year plan, we aim to see a significant increase in the percentage of qualifications studied through the medium of Welsh as learners and parents become more confident in choosing Welsh-medium education. There will also be a wider variety of vocational qualifications taught through the medium of Welsh available within the Local Authority in order to allow full access of the Welsh language to all learners.</i>	
5	<i>All schools within the Local Authority will be fully engaged with Curriculum for Wales in conjunction with the Siarter Iaith. The Welsh</i>	

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	<i>language, contemporary culture and history will be integral to curriculum design. We will see an increase in learner and staff confidence and pride towards being Welsh and the Welsh language. The Welsh language and the associated extra-curricular activities will be inclusive and will radiate into the wider community, allowing all to have access and to develop their Welsh-language skills.</i>	
6	<i>All pupils with ALN within the local authority will have access to provision at all levels through the medium of Welsh. Collaboration with regional partners will provide a comprehensive range of resources, training opportunities and networking to ensure that Welsh-medium provision will be of a high standard and complies with the Additional Learning Needs and Educational Tribunal Act (Wales) 2018. Early Years and pre-school WM ALN support, assessments and provision will provide increased confidence in parents when choosing Welsh-medium education for their children.</i>	
7	<u>Outcome 7 ten year target:</u> <i>An increased number of the NPT education staff will be able to teach through the medium of Welsh and Welsh as a subject. There will be an increase in Welsh-medium staff able to teach specific subjects at secondary level. There will be an increase in the number, ability and confidence of staff in English-medium schools able to converse and teach Welsh, therefore increasing the amount of learners with access to Welsh-medium education at all levels throughout the Local Authority. NPT will attract and recruit excellent, bilingual leaders for our schools. All NPT schools will form communities that promote the Welsh language as a medium for education and community life.</i>	

## FOREWARD LOOK MILESTONES

- Progress with the Sustainable Schools Challenge build in YGG Rhosafan. The new school will include a Welsh Immersion Centre and a Welsh-medium ALN provision.
- Progress with a scheme to implement the 3<sup>rd</sup> renovation and refurbishment project in the new YGG Tregales (Key Stage 2 classrooms)
- Develop additional Welsh-medium Childcare and increase places in existing provisions. Next year will focus on projects in Ystalyfera, Blaendulais and Cwmafan
- Launch of Welsh-medium promotional material
- Launch the Welsh Language and Culture Festival roadshows to promote Welsh-medium education and myth busting.
- Develop community of Welsh speaking staff in the Cefn Saeson Comprehensive cluster



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## Outcome 1

More nursery children/ three year olds receive their education through the medium of Welsh

### KEY ANNUAL DATA

#### Outcome 1 ten year target (*table 1*)

Numbers and % of 3-year olds receiving their education through the medium of Welsh				
2022 - 2023	2023 - 2024	2024 - 2025	2025 - 2026	2026 - 2027
21.4%	22.8%	24.2%	25.5%	26.8%
2027 - 2028	2028 - 2029	2029 - 2030	2030 - 2031	2031 - 2032
28.1%	29.5%	30.8	32.0%	33.4%

#### % of pupils N1-Y11 in Welsh-medium education (*table 2*)

	Actual Number	%
2023	3329	16.2
2024	3350	16.5

#### Actual percentage of learners in nursery who are taught through the medium of Welsh using PLASC data 2023-2024 (*table 3a*)

Nursery Numbers/%

	Nursery 2	Nursery 1
PLASC 2023	20.0%	22.1%
PLASC 2024	21.5%	19.9%

It is important to note that there has been a significant fall in birth rates across the Local Authority.

The number of pupils attending English-medium education decreased significantly in 2023/2024 as shown in the table below:

#### PLASC data English-medium total (*table 3b*)

Pupil Numbers	2021/22	2022/23	2023/24
Pupil No's: All	17719	17444	17205
Pupil No's: Y1-Y6 by NCY	7781	7604	7495
Pupil No's: Y1-Y6 by Age	7780	7604	7494
Pupil No's: Y7-Y11 by NCY	7027	7115	7100
Pupil No's: Y7-Y11 by Age	7027	7114	7091

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Contrary to the decrease in birth rate, we have retained or increased the number of pupils attending Welsh-medium education as shown in the table below:

PLASC data Welsh-medium total (table 3c)

<b>Pupil Numbers</b>	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>
Pupil No's: All	3499	3536	3536
Pupil No's: Y1-Y6 by NCY	1475	1504	1512
Pupil No's: Y1-Y6 by Age	1476	1504	1512
Pupil No's: Y7-Y11 by NCY	1159	1199	1230
Pupil No's: Y7-Y11 by Age	1158	1199	1230

In comparison, the overall number of pupils attending Welsh-medium education N1 (excluding N2 new starters) -Y11 increased slightly :

2023 – 3329 (16.2%)

2024 – 3350 (16.5%)

The number of Cylchoedd Meithrin within the local authority area and also the number and percentage of children transferring from Cylchoedd Meithrin to Welsh-medium primary education (table 4)

*Number of Cylchoedd Meithrin*

<b>Service Name</b>	<b>Service Address Town/City</b>	<b>Service Type</b>	<b>Service Sub Type</b>	<b>Maximum Capacity</b>	<b>Date Of Registration</b>
Cylch Meithrin Mwy Blaendulais	Neath	Childrens Day Care	Sessional Day Care	12	31/03/2002
Tiddlywinks Childcare Centre	Swansea	Childrens Day Care	Full Day Care	43	31/03/2002
Lots of Tots (Canolfan Maerdy)	Ammanford	Childrens Day Care	Full Day Care	52	22/04/2009
Meithrinfa Ddydd Ser Bach / Little Stars Day Nursery	Neath	Childrens Day Care	Full Day Care	19	13/04/2009
Meithrinfa Ddydd y Waun	Ammanford	Childrens Day Care	Full Day Care	19	15/04/2013
Georgie Porgie`s Cylch Tir Morfa	Port Talbot	Childrens Day Care	Full Day Care	24	05/01/2015
Cylch Chwarae Pontardawe	Swansea	Childrens Day Care	Full Day Care	37	19/07/2016
Cylch Meithrin Cwmnedd	Neath	Childrens Day Care	Full Day Care	20	12/08/2018
Cylch Meithrin Cwmllynfell	Swansea	Childrens Day Care	Full Day Care	19	08/09/2022
Cylch Meithrin Teulu'r Tyle	Castell-nedd	Childrens Day Care	Full Day Care	24	11/11/2022
Gofal Plant Tregales	Neath	Childrens Day Care	Full Day Care	18	24/05/2023
Cylch Meithrin Trebannws	Pontardawe	Childrens Day Care	Sessional Day Care	12	Registered and opening to children Sep 2024
			<b>Total Places</b>	<b>*299</b>	
<b>Opening 2024-2025</b>					
Cylch Meithrin Mwy Blaendulais	Neath	Childrens Day Care	Full Day Care	30 (additional 18 places)	Summer 2025
Cylch Meithrin Cwmafan-Bilingual	Port Talbot	Childrens Day Care	Full Day Care	25 (additional places)	Summer 2025

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Cylch Meithrin Ystalyfera	Ystalyfera	Childrens Day Care	Sessional Day Care	16	Summer 2025
Canolfan Plant Gerddi Victoria	Neath	Childrens Day Care		24	Autumn 2024
			Total Places	382	

\*The reduction in numbers in the current total places for this academic year is due to the timing of Cych Chwarae Castell-nedd closing and its new enhanced replacement, Canolfan Plant Gerddi Victoria opening.

Transition from Cylchoedd Meithrin based on school sites to Welsh-medium Nursery is 100%.

### **Flying Start** (table 5)

The number of children accessing Welsh language in Flying Start, accumulative, is as follows:

Year	Number of children
2020-21(during Covid)	77
2021-22	142
2022-2023	141
2023-2024	134 *

\*The reduction in numbers in the current total places is due to the timing of Cylch chwarae Castell-nedd closing and its new enhanced replacement, Canolfan Plant Gerddi Victoria opening. Children attending the additional 4 new settings with 83 additional places will be able to access Welsh language Flying Start.

### **The number and percentage of learners in nursery who are taught through the medium of Welsh using PLASC data** (table 6)

	Nursery 2	Nursery 2 actual numbers	Nursery 1	Nursery 1 – actual numbers
PLASC 2022	20.0%	272	20.1%	107
PLASC 2023	20.0%	257	22.1%	90
PLASC 2024	21.5%	268	19.9%	78

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## OUTCOME SUMMARY

- Expanding Welsh-medium early years provision including Flying Start

At least 3 additional Welsh or bilingual settings are due to open within the 2024/25 to support childcare sufficiency, access to Welsh Language childcare, Cymraeg 2050, or WESP and further Flying Start expansion.

Plans are ongoing for the following:

- Canolfan Plant Gerddi Victoria – Neath Central (Tender about to be released)
- Relocation and increase in registered numbers for Cylch Blaendulais (New build due to complete July 2025)
- Cwmafan bilingual childcare (new build due to complete June 2025)
- Cylch Trebannws – YGG Trebannws (due to open September 2024)
- Discussions are on-going with existing provider Aberavon ICC to reintroduce Welsh-medium provision within their setting from September 2024

An additional space for childcare is being developed in YGG Ystalyfera, where the space will be made CIW compliant, before identifying a suitable Welsh Language Provider.

These new settings will be used to offer and encourage Welsh language and bilingual childcare to all including, FS families and outreach children within NPT.

While we are committed to the increase and development of Welsh language childcare provision, we also recognise that childcare providers are enthusiastic about offering more Welsh language opportunities in their setting. We have staff that are passionate about the Welsh Language, working with the English Medium settings to improve the Welsh they offer through an award based Welsh Language quality assurance scheme the “Welsh in Childcare Award” which includes support, access to training and drop-in Welsh language acquisition sessions. The change in categories may mean over time a move from category 1 English language settings to category 2 English / Welsh language settings

Tregeles, Pontardawe, Ystalyfera and Rhosafan Ti a Fi sessions are successful and growing in numbers with good engagement, parents/carers are building links with the schools and childcare providers. Plans for EYFS Transition Officer to attend groups from September 2024 and discuss transition into childcare concerns with families, offering support where needed.

- Activities that are being implemented to increase uptake of Welsh-medium childcare places

- Ongoing Song & Rhyme sessions for Early Years families have been successful and create early links and myth busting around concerns about Welsh-medium education and childcare.

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- Early Years and Flying Start Welsh Fun Day (15<sup>th</sup> September 2024) to promote Welsh language childcare and Welsh language in the early years and beyond.
- Welsh-medium staff from the FS team attending stay and play to carry out Welsh song & rhyme sessions which has been very successful and there have been many queries answered around Welsh-medium childcare and education.
- Promoting the benefits of bilingualism via social media platforms with the support of the NPT Family.
- Filming the 'Never too soon to start' Welsh language promotion in Childcare Settings, schools, groups, speaking to local authority staff and local families.
- An 'Early Years and Flying Start' bilingual Facebook page is now active and provides support for families within NPT. The content includes correct and up to date information on support, activities and new initiatives and has an emphasis on the benefits of bilingualism as well as easily accessible bilingual resources for parents and carers.
- 2 professional Early Years videos, 'Taith at Ddwy Iaith' have been made and will be launched in the Autumn term to promote the benefits of bilingualism and encourage non-Welsh speaking parents to partake in the activities listed above.
  
- Analysis of the Childcare Adequacy Assessment to identify areas for development
  - A Childcare Sufficiency Assessment Welsh-medium subgroup has been formed and includes partners from the LA (transformation co-ordinator, educational support officers, corporate policy officer, Welsh Promotion Officer SSIP Department), Mudiad Meithrin, Menter Iaith, NPT Staff, Dysgu Cymraeg Ardal Bae Abertawe and representation from schools and childcare settings to address targets arising from the Childcare Sufficiency Assessment. Targets and actions from meetings align with WESP Targets (with an emphasis on Outcome 1 and 7) to ensure cohesion and reduce any duplication.
  - The Outcome 1 sub-group consists of many of the partners noted above as well as additional LA officers and RhAG representatives and meet on a termly basis to evaluate progress and set targets and actions arising from the annual plan, the 5-year plan and the 10-year WESP.
  
- Details of how the tendering arrangements and processes support the commitments under this outcome
  - All NPT childcare tendering arrangements require the provider to offer Welsh/bi-lingual provision.
  
- Collaboration with organisations in the early years sector to strengthen and expand Welsh-medium childcare provision in the area
  - There has been close collaboration with Mudiad Meithrin, Menter Iaith, Dysgu Cymraeg Ardal Bae Abertawe, Camau.
  - The formation of the Welsh-medium CSA subgroup has facilitated the collaborative work in supporting Welsh-medium childcare settings.
  - An EYFS Welsh development day 'What's so good about Welsh?' with Nia Beynon was held on February 7<sup>th</sup>, 2024.

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- A Welsh Language and Culture Festival roadshow is being prepared for the forthcoming academic year which will include many of the partners above as well as other organisations i.e. RhAG, Menter Iaith etc. in order to alleviate parental concerns around the language as well as ‘myth busting’ common misconceptions about Welsh-medium education.
- Sharing information about the availability of education and other Welsh-medium provisions with parents/carers and work with the Family Information Service, the admissions teams, and external agencies to ensure this
- From an Early Years perspective, the ‘Early Years & Flying Start’ and ‘NPT Family’ social media pages share any information regarding Welsh-medium provisions.
- When registering for Flying Start, parents/ carers have the option to choose a Welsh-medium childcare provision should they wish.
- A member of staff from NPT Family Information attends the Welsh Sub-group meeting to ensure they are kept up to date with information regarding Welsh-medium provisions.

#### **IMPLEMENTATION AND MONITORING**

Local Authority officers and the WESP Outcomes sub-groups are responsible for setting targets and monitoring progress against actions within the 10 year plan, the 5 year plan and the annual plan. A range of quantitative and qualitative data is collected and analysed throughout the year in order to obtain an informed evaluation of progress and to set further targets. Information is shared through regular sub-group meetings and reported back to the full WESP forum annually.

#### **RISKS**

- No grant funding or late offer of grant funding leading to projects not being delivered within the grant period.
- External pressures and influences impacting on project progress.
- Capacity of small teams/ Welsh-medium staff to continue to deliver growing number of projects.

#### **ASSURANCE / MITIGATION ACTION**

- LA to look into funding structures and programmes to ensure continuation of provision.
- Regular communication with WG and negotiation over realistic timescales.
- Effective planning to meet statutory timelines, collaborating with other services to share responsibilities, good practice.
- Recent appointment of an additional Welsh speaking senior member of staff in the Early Years & Flying Start team who will be able to drive forward initiatives within the wider Early Years and childcare sector.

#### **FORWARD LOOK**

Plans are ongoing for the following:

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- Canolfan Plant Gerddi Victoria – Neath Central (Tender about to be released)
- Relocation and increase in registered numbers for Cylch Blaendulais (New build due to complete Summer 2025)
- Cwmafan bilingual childcare (new build due to complete Summer 2025)
- Opening and promoting Cylch Trebannws in September 2024.
- Increasing the level of Welsh language used in English settings through the Welsh in Childcare Award.
- NPT Early Years and Flying Start staff to attend Welsh language training in order to support Early Years and Childcare.

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## Outcome 2

More reception class children/ five year olds receive their education through the medium of Welsh

### KEY ANNUAL DATA

#### Outcome 2 ten year target (*table 7*)

Numbers and % of 5-year olds receiving their education through the medium of Welsh				
2022 - 2023	2023 - 2024	2024 - 2025	2025 - 2026	2026 - 2027
19.7%	21%	22.3%	23.6%	24.9%
2027 - 2028	2028- 2029	2029 - 2030	2030 - 2031	2031 - 2032
26.2%	27.5	28.8	30.0%	31.4%

#### % of pupils N1-Y11 in Welsh-medium education (*table 8*)

	Actual Number	%
2023	3329	16.2
2024	3350	16.5

#### Actual percentage of learners in nursery who are taught through the medium of Welsh using PLASC data 2023-34 (*table 9*)

PLASC	Percentage % 2023	Number of pupils% 2024
Reception	19.7	19.7

#### Reception Age Pupils in Welsh-medium schools PLASC 2024 (*table 10*)

Reception aged pupils by school			
Name	2023-24	2024-25	+/-
Gwaun Cae Gurwen	21	24	+3
Trebannws	13	4	-9
Ystalyfera	14	18	+4
Tyle'r Ynn	33	37	+4
Rhosafan	39	51	+12
Castell-nedd	59	44	-15
Cwm Nedd	14	13	-1
Tregeles	3	8	+5
Blaendulais	17	4	-13
Cwmllynfell	4	8	+4
Pontardawe	45	52	+7
<b>Total</b>	<b>262</b>	<b>263</b>	<b>+1</b>



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Surplus places in Welsh-medium schools data (table 11)

	Number of schools	% of schools
Full capacity	2	18.18
0-10% unfilled places	0	0
11-25% unfilled places	3	27.27
26-50% unfilled places	5	45.45
Over 50% unfilled places	1	9.09

The number and percentage of Black, Asian and minority ethnic background learners who are taught through the medium of Welsh using PLASC Data (table 12)

Black, Asian and minority ethnic background learners			
	Welsh-medium schools	All NPT schools	% in Welsh-medium
PLASC 2023	89	1515	5.9%
PLASC 2024	95	1679	5.7%

Y Cwm Immersion Centre data (table 13)

Term	Number of pupils
Autumn 2023	18
Spring 2024	15
Summer 2024	20
<b>Total</b>	53 (4 latecomers, 49 language intervention)

**OUTCOME SUMMARY**

- Reception and year 1 information

The following tables show the number of pupils in reception and Year 1 (PLASC 2023/2024):

*(Table 14)*

Reception aged pupils by school			
Name	2023-24	2024-25	+/-
Gwaun Cae Gurwen	21	24	+3
Trebannws	13	4	-9
Ystalyfera	14	18	+4
Tyle'r Ynn	33	37	+4
Rhosafan	39	51	+12
Castell-nedd	59	44	-15
Cwm Nedd	14	13	-1
Tregeles	3	8	+5
Blaendulais	17	4	-13
Cwmllynfell	4	8	+4
Pontardawe	45	52	+7

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<b>Total</b>	262	263	+1
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(Table15)

Year 1 pupils by school			
Name	23-24	2024-25	+/-
Gwaun Cae Gurwen	18	21	+3
Trebannws	11	13	+2
Ystalyfera	21	14	-7
Tyle'r Ynn	43	33	-10
Rhosafan	48	39	-9
Castell-nedd	62	59	-3
Cwm Nedd	19	14	-5
Tregeles	-	3	+3
Blaendulais	10	17	+7
Cwmllynfell	6	4	-2
Pontardawe	37	45	+8
<b>Total</b>	275	262	-13

The Reception pupil percentage has remained at 19.7% for PLACS 2024. At present, admission applications foresee a 1 pupil increase in the Reception September 2024 data. This was anticipated as many of these pupils were in the education system at the start of the WESP period (parents had already made the choice and applied to admissions). It is anticipated that an increase will be seen in the next academic years due to the implementation of the following WESP targets:

- YGG Tregeles The first full year cohort of Reception pupils will start in September 2024. Presently, nursery figures show Reception 2025 figures will be 21 and Reception 2026 figures will be 24 (without any additional intakes that may occur throughout the years).
- YGG Tyle'r Ynn Investment in extending Foundation Phase and Childcare facilities (Welsh-medium Capital Grant) has resulted in an increase in pupil numbers. Presently, nursery figures show Reception 2025 figures will be 36 and Reception 2026 figures will be 33 (without any additional intakes that may occur throughout the years).
- Childcare In order to increase pupil numbers in YGG Trebannws and Ysgol Gymraeg Ystalyfera Bro Dur primary phase, a new childcare facility offering wrap around provision will open in both in 2024-2025 academic year. Positive parental feedback and pupil names already registered for these facilities suggest that there will be a significant increase in pupil intake in both schools in the coming years. A further new Welsh-medium childcare facility will open in the village of Blaendulais adjacent to YGG Blaendulais. The current Cylch Mwy Blaendulais in YGG Blaendulais will relocate to this purpose built larger facility enabling the intake number to increase significantly from 12 to 32.

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As of 2024-2025 academic year, every Welsh-medium school will have a feeder Welsh-medium childcare provision either on site or very close to the school.

- Update on how you are Assessing the strategic outline programme (9-year investment) as part of the Sustainable Communities for Learning Programme to ensure it is consistent with the aims and objectives of the WESP

The SOP Strategic Outline Programme has been completed and submitted to Welsh Government in February 2024. The 9 year Strategic Outline Programme has key projects that will target WESP data. As stated in the SOP, our aims include:

- To meet and stimulate demand for Welsh-medium provision, to ensure a Wales of vibrant culture and thriving Welsh Language.
- To ensure that pupils in the Neath Port Talbot area can access high quality Welsh-medium provision through all key stages of education.
- To support Welsh Government aspirations for 1 million Welsh speakers by 2050.
- To provide coverage for unmet demand for Welsh-medium childcare as demonstrated through the Childcare Sufficiency Audit.
- To increase the percentage of Y6 pupils in Welsh-medium Primary Schools who continue to study through the medium of Welsh in the secondary sector.
- Increase the number of Welsh-medium groups running within settings and schools i.e. Babi a Fi, Ti a Fi, baby massage, parenting classes - expansion of onsite provision.
- Develop immersion provision for latecomers to the Welsh language.
- To address unmet demand we will continue providing specialist Welsh-medium education for pupils.

The following projects are included in the 9 year rolling programme in order to address the targets above:

- YGG Rhosafan (Sustainable Schools Challenge)

As a result of the new build which will be occupied in 2026, there will be an increase in capacity as seen in the table below:

Table 16

	Existing (fit)	Proposed (fte)	Change (+/-)
Childcare offer	30	48	+18
Nursery	78	90	+12
Primary	392	420	+28
ALN	0	12	+12
Welsh Immersion	0	16	+16
Total	500	570	+86

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- New Welsh-medium School Ysgol Gymraeg Newydd Dwyrain will be a new Welsh-medium 3-11 Primary school for 465 places (incl 45 place Nursery), 12 place LSC and 16 place immersion centre. We are currently working closely with our planners (in line with the renewed LDP) to identify the best location for this school in the east of the authority. This will lead to a significant increase in Welsh-medium pupil numbers. Discussions regarding additional Welsh-medium secondary places will develop when land is identified.
- 3<sup>rd</sup> New Welsh-medium school The 9 year rolling programme and WESP includes a 3<sup>rd</sup> new 2 form entry Welsh-medium primary school to be delivered in the second half of the WESP cycle (years 6-9 of the rolling programme). Details of this provision i.e. location will be developed over the life cycle of the WESP and 9 year programme in line with detailed data analysis of Welsh-medium demand.
- Wider school organisation proposals to support the aims and objectives of the WESP

As outline above, the WESP plays a central role in all decisions taken in the context of wider school organisational proposals and capital spends.
- Swansea Valley Reorganisation - The First Minister has approved the removal of the Ysgol Newydd Swansea Valley project from the authority's Band B programme but has not approved the inclusion of the Godre'rgraig Primary School project. The Council recognises that a permanent long term solution must be found for Godre'rgraig Primary School pupils who since July 2019 were relocated from Godre'rgraig into temporary demountable buildings at Parc Ynysderw, adjacent to Cwmtawe Community School after geological experts found there was a potential landslide risk to the school's playground. Concerns have been expressed about the potential impact the proposal could have on the Welsh language given the resulting proposed increase in English medium places. Currently, the Local Authority has commissioned an independent consultant, Meirion Prys Jones, to produce a detailed Welsh Language Impact Assessment for the proposal.
- ALN organisational proposals- There is currently a strategic plan to deliver Welsh-medium specialist ALN Learning Support Centre provision throughout the Local Authority. They include:
  - YGG Rhosafan LSC- The new Welsh-medium 12 place Learning Support Centre included in new build YGG Rhosafan (Sustainable Schools Challenge) is currently being designed and developed with architects and contractors. The design stage will be completed by the end of 2024 with the aim of completing the build by Summer 2026. Occupation of the new LSC will be in September 2026.

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Formal consultation for the new Welsh-medium LSC will commence in Spring 2025.

-YGG Trebannws LSC- work on establishing a Welsh-medium learning support centre at YGG Trebannws is developing. This is a gradual, steady process transitioning from the predominantly English-medium previous provision to a bilingual provision and eventually to a fully Welsh-medium provision. Currently, only Welsh language pupils are being placed in the provision with 2 English-medium pupils remaining in upper KS2. It is expected that the last cohort of English pupils will transition to secondary provision by September 2025. Formal consultation to transition to a Welsh-medium Learning Support Centre will commence in 2025.

-Secondary Welsh-medium ALN provision- work on establishing secondary Welsh-medium ALN provision in Ysgol Gymraeg Ystalyfera Bro Dur (north and south sites) has started. This will ensure a planned pathway for pupils with ALN from primary (YGG Trebannws in the north and YGG Rhosafan in the south) to secondary education.

- Early Years Capital Grant Spend- Early Years Capital Grant spend has focused on developing, sustaining and increasing numbers of Welsh-medium childcare provisions throughout the local authority. As stated above, as of 2024-2025 academic year, every Welsh-medium school will have a feeder Welsh-medium childcare provision either on site or very close to the school.
- Plans to tackle surplus spaces in schools

A Welsh Language Promotion Officer has been appointed full time until August 2025 (with the aim of continuing beyond 2025 in line with funding). One of his main objectives is to work closely with the Welsh-medium cluster to tackle surplus places in our Welsh-medium schools. PLASC data from the last 3 years shows that the majority of the surplus places are in the smaller schools in the north of the Local Authority. Our Welsh Language Promotion Officer has worked closely with Headteachers, officers and RhAG to produce a range of promotional material in order to target pupils and highlight Welsh-medium pathways from pre-birth through to further education (both higher education and vocational pathways). Promotional material include a series of 6 professional videos 'Taith at Ddwy laith' which promotes the benefits of bilingualism and Welsh-medium education throughout the Local Authority. They will be officially launched in the Autumn term. Further promotional work has been done in the form of professionally produced prospectuses, flyers and promotional banners for Welsh-medium schools, with specific emphasis on schools with surplus places i.e. YGG Cwmllynfell, YGG Trebannws, YGG Gwaun-Cae Gurwen, YGG Blaendulais, YGG Cwmnedd.

Furthermore, the Welsh Language Promotions Officer is working closely with Early Years officers to produce a 'Welsh Language and Culture Festival' roadshow which will begin in the Autumn term with the aim of myth busting common concerns

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surrounding Welsh-medium education and promoting Welsh-medium pathways for all pupils.

- Increasing Welsh-medium provision in schools that are not Welsh-medium. e.g., opportunities to increase Welsh-medium provision in English-medium schools or schools looking to transition to a different category.

The Local Authority is currently working closely with the National Centre for Learning Welsh with the aim of transitioning one English-medium cluster along the language continuum. Currently 4 staff members from Cefn Saeson Comprehensive School are half way through the new pilot for language acquisition and have attended the first block of residential in Nant Gwrtheyrn. It is our aim to work closely with the National Centre for Learning Welsh to develop a Welsh speaking community within the Cefn Saeson feeder cluster primaries. This will ensure pupil transition and progression from primary to secondary as well as forming a natural cluster support group for staff in both the primaries and secondary cluster schools.

A mapping out exercise of Welsh-medium provision has been completed (by *Fforwm Iaith Abertawe a CNPT*). The map includes information from all parties outlining the activities, providers, age groups, locations, cost and times of events/ activities. It outlines activities suitable for children and young people as well as community activities and online resources. This resource will be shared and used for future planning in schools and communities (outcome 5). Currently, there are 186 activities and resources available.

- Provision for latecomers

'Y Cwm', the latecomer provision based in YGG Pontardawe continues to be successful. This academic year, we have accepted pupils from Powys (Ysgol Dyffryn y Glowyr) with the aim of ensuring that these pupils will be confident to transition to Ysgol Gymraeg Ystalyfera Bro Dur North Campus. It is possible that pupils from Ysgol Y Cribarth will be able to access the provision in the following years in order to assist with their transition to dual stream, again with the aim of increasing the number of pupils transitioning to Welsh-medium secondary education in Ysgol Ystalyfera Bro Dur North Campus.

The second immersion centre based in the new YGG Rhosafan in the south of the Local Authority will open in 2026. This will allow more pupils to access the provisions as well as significantly reducing the current transport costs.

## **IMPLEMENTATION AND MONITORING**

Local Authority officers and the *WESP Outcomes* sub-groups are responsible for setting targets and monitoring progress against actions within the 10 year plan, the 5 year plan and the annual plan. A range of quantitative and qualitative data is collected and analysed throughout the year in order to obtain an informed evaluation

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of progress and to set further targets. Information is shared through regular sub-group meetings and reported back to the full WESP forum annually.
<b>RISKS</b>
<ul style="list-style-type: none"><li>• No grant funding or late offer of grant funding leading to projects not being delivered within the grant period.</li><li>• External pressures and influences impacting on project progress.</li><li>• Capacity of small teams/ Welsh-medium staff to continue to deliver growing number of projects.</li></ul>
<b>ASSURANCE / MITIGATION ACTION</b>
<ul style="list-style-type: none"><li>• LA to look into funding structures and programmes to ensure continuation of provision.</li><li>• Regular communication with WG and negotiation over realistic timescales.</li><li>• Effective planning to meet statutory timelines, collaborating with other services to share responsibilities, good practice.</li><li>• Succession planning in order to identify where biggest pressures exist and what can be done to alleviate them. Feed these targets/ pressures into Outcome 7 targets.</li></ul>
<b>FORWARD LOOK</b>
<ul style="list-style-type: none"><li>• Identify land for the second and 3<sup>rd</sup> Welsh-medium schools</li><li>• Closely monitor and amend targets as needed to reduce surplus capacity in Welsh-medium primary schools</li><li>• Develop and promote the 2<sup>nd</sup> immersion centre in the south of the Local Authority</li><li>• Develop a strategic plan to transition English-medium cluster along the language continuum i.e. funding, training, staff support, parental buy-in etc.</li></ul>

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## Outcome 3

More children continue to improve their Welsh language skills when transferring from one stage of their statutory education to another

### KEY ANNUAL DATA

#### Outcome 3 ten year target:

By the end of the 10 year plan we will see a significant increase in the number of learners transferring from WM primary to YGYBD as well as an increase in the number of learners remaining in WM education from KS3 to KS4 (see Outcome 4). It is intended to see an increase in the number latecomers changing to WM education as a result of successful immersion, as parents become more informed and confident with WM education.

#### PLASC data

Transition from one key stage to the next PLASC 2022 (*table 17*):

School Year	Actual numbers/ Percentage 2022
N2 (2021) to Rec (2022)	290 to 286 (98.6%)
Year 2 (2021) to Year 3 (2022)	238 to 231 (97.1%)
Year 6 (2021) to Year 7 (2022)	222 to 233 (105.0%)
Year 11 (2021) to Year 12 (2022)	201 to 111 (55.2%)

Transition from one key stage to the next PLASC 2023 (*table 18*):

School Year	Actual numbers/ percentage
N2 (2022) to Rec (2023)	272 to 279 (102.6%)
Year 2 (2022) to Year 3 (2023)	252 to 249 (98.8%)
Year 6 (2022) to Year 7 (2023)	247 to 256 (103.6%)
Year 11 (2022) to Year 12 (2023)	208 to 105 (50.5%)

Transition from one key stage to the next PLASC 2024 (*table 19*):

School Year	Actual numbers/ percentage
N2 (2022) to Rec (2023)	257 to 262 (101.9%)
Year 2 (2022) to Year 3 (2023)	278 to 272 (97.8%)
Year 6 (2022) to Year 7 (2023)	245 to 286 (116.7%)
Year 11 (2022) to Year 12 (2023)	234 to 95 (40.6%)



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## OUTCOME SUMMARY

Information on transition data for 3 year olds and 5 year olds are noted in the Outcome 1 and Outcome 2 progress summary. Information regarding Key stage 4 transition data will be noted in the Outcome 4 progress summary.

- The methods used to monitor linguistic progression
  - Data has been analysed (Welsh-medium schools) to identify individual schools and areas that are showing an increase and decrease in transition.
  - Year 6 to Year 7 transition has been analysed on an individual school level to identify increase/ decrease in transition levels as well as patterns in transition from Welsh-medium to English-medium schools and the locations of the English-medium schools.
  - Transition data is now discussed in every Cluster meeting with the aim of identifying patterns/ concerns at an early stage and creating an action plan for addressing these issues.
  - A linguistic skill progression map is being developed by the Ystalyfera cluster (in line with the new curriculum) to ensure cohesion from school to school when assessing pupils along the language continuum. This will ensure consistency when assessing pupils and providing support/ intervention if needed. This will also assist when identifying pupils in need of Welsh language intervention in the immersion provisions.
  - Significant funding from the Cymraeg 2050 element of the LAEG has been invested in this element (£30,000) in order to produce and implement a transition plan for pupils and Key Stages, including post 16 pupils in order to ensure that pupils continue learning through the medium of Welsh. This will be evaluated at the end of the academic year 2024-2025.

- Transition arrangements for Key Stages/ Collaboration with schools to understand the reasons behind transitions to schools

As noted above, current transition plan are proving effective for some Key Stages. Nursery to Reception has yet again over 100% transition rate. Years 2 to 3 remains stable at 97.8% with any losses due to movement of families out of the county. Years 6 to 7 has seen a significant increase to 116.7% (+13.1%). Year 11 to 12 has seen a decrease of 9.9% with many pupils leaving to take up English-medium vocational courses in colleges.

The aim of the transition plan is to target specific areas and schools where we see the greatest loss:

- *Years 6 to 7 transition*- The transition plan has specific emphasis on YGG Trebannws, YGG Gwaun Cae Gurwen, YGG Pontardawe and YGG Cwmllynfell which lose pupils to English-medium secondary and out of County secondary provision (it is important to note that the pupils attending Dyffryn Aman will start in the Welsh stream in Year 7 and will therefore continue with Welsh-medium

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education). Additional support days/ transition activities for schools with lower transition rates are included in the plan as well as additional information for parents.

Current transition activities include:

- Ystalyfera'n cyfri- teachers from YGYBD attend cluster schools for 1 hour weekly to deliver a specific series of lessons.
- Hawl i Holi-pupils and staff from YGYBD attend cluster schools and primary pupils have an opportunity to ask questions or voice any transition concerns/ anxieties.
- Transition website for pupils transferring to YGYBD.
- Additional transition days for pupils with ALN or anxiety.
- Open days for pupils and open evenings for families.
- Gwyl Haf- 3 day summer camp for Year 5 pupils based on a specific theme and followed by a presentation to parents.
- Proms- vocal and instrumental. Y5 and Y6 pupils from cluster schools attend YGYBD and are taught by staff and pupils for the day. It is followed by an orchestral performance in the evening (instrumental) or a performance by the YGYBD Cluster Choir.
- Gig Tanio'r Ddraig- Y5, 6, 7 pupils attend a music festival in YGYBD playing fields annually with the best of current Welsh bands and talent performing.
- Cluster sports day for KS2 pupils from feeder primaries on YGYBD playing fields.

- *Years 11 to 12 transition*-The transition plan also targets the Years 11 to 12 cohort to ensure linguistic progression whether in school or in college. This will be supported by the Education Learning Pathways Strategy in NPT. A skills hub targeting pupils from 14 upwards will be built and opened in Ysgol Gymraeg Ystalyfera Bro Dur in March 2025 with emphasis on providing bilingual pre vocational and vocational courses for pupils (bilingual pathways and opportunities will be mapped out for pupils and parents from age 14 upwards). This will be further enhanced with the opening of the bilingual Skills Centre in Port Talbot (9 year rolling programme) in 2027 where a range of vocational pathways will be offered to pupils from the age of 14 upwards. This will enhance the current Welsh-medium vocational offer for pupils as well as assisting in delivering a bilingual Full 14-16 Qualification Offer.
- A series of 6 professional videos, 'Taith at Ddwy Iaith', have been commissioned and are ready to be launched in the Autumn term with a focus on the Welsh-medium pathways from pre-birth through to further education (both higher education and vocational pathways). The promotional material promotes the benefits of bilingualism and Welsh-medium education throughout the Local Authority.
- A Welsh Language and Culture roadshow is being prepared for the forthcoming academic year which will include many of the partners above as well as other organisations i.e. RhAG, Menter Iaith etc. in order to alleviate parental concerns

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around the language as well as ‘myth busting’ common misconceptions about Welsh-medium education for all key stages.

- Work with other local authorities to ensure continuity of arrangements for learners receiving Welsh-medium education outside your area.

Due to the high numbers of pupils attending Ysgol Gymraeg Ystalyfera Bro Dur North Campus from Powys(49 Year 7 pupils in 2023), talks are underway between NPT Officers and Powys Officers to ensure that transition work and information sharing is effective between the two Local Authorities. Initial discussions took place in January 2024 with the Director of Education for Powys where both Local Authorities were keen to develop this aspect. We are currently planning to continue discussions with the new Director of Education in Powys to progress these plans.

- The Outcome 3 sub-group consists of many partners and meet on a regular basis to evaluate progress and set targets and actions arising from the annual plan, the 5 year plan and the 10 year WESP. They support and strengthen the work of the cluster and parents' confidence in the Welsh language. They encourage early support and preparation within the Primary sector to communicate expected pathways to pupils and parents through their promotional strategies.

## **IMPLEMENTATION AND MONITORING**

Local Authority officers and the *WESP Outcomes* sub-groups are responsible for setting targets and monitoring progress against actions within the 10 year plan, the 5 year plan and the annual plan. A range of quantitative and qualitative data is collected and analysed throughout the year in order to obtain an informed evaluation of progress and to set further targets. Information is shared through regular sub-group meetings and reported back to the full WESP forum annually.

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## **RISKS**

- Population growth not following the patterns as expected in the data analysis leading to a reduced number of pupils in the education system, reduced number of pupils in specific areas
- Strategic plans/ potential new Welsh-medium schools in neighbouring authorities could significantly reduce transition numbers to Ysgol Ystalyfera Bro Dur north campus (significant intake from Carmarthenshire and Powys)
- External pressures and influences impacting on progress e.g. new childcare/ wrap around facilities in neighbouring authorities/ English-medium childcare establishments offering longer hours.
- No funding leading to projects not being delivered e.g. Menter Iaith funding for Gig Tanio'r Ddraig.

## **ASSURANCE / MITIGATION ACTION**

- Update catchment data analyses for Welsh-medium education on a biannual basis
- Keep up to date with developments in neighbouring authorities and increase pupil numbers from within the local authority to offset any loss
- Keep up to date with childcare/ wrap around developments in neighbouring authorities and the English-medium sector (regular meetings with Early Years colleagues) and long term strategic planning of future Welsh-medium provisions in line with the Childcare Sufficiency Report
- LA to look into funding structures and programmes to ensure continuation of provision

## **FORWARD LOOK**

- Continue to implement and adapt cluster transition plan in line with local needs and data
- Plan and implement the linguistic transition pathway for a cluster of English-medium schools (as outlined in Outcome 2)
- Ensure agreements (both formal and informal) are in place with neighbouring Local Authorities to ensure smooth transition for pupils into Ysgol Gymraeg Ystalyfera Bro Dur.

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## Outcome 4

More learners study for assessed qualifications in Welsh (as a subject) and subjects through the medium of Welsh

### KEY ANNUAL DATA

#### Outcome 4 ten year target:

By the end of the 10 year plan, we aim to see a significant increase in the percentage of qualifications studied through the medium of Welsh as learners and parents become more confident in choosing Welsh-medium education.

There will also be a wider variety of vocational qualifications taught through the medium of Welsh available within the Local Authority in order to allow full access of the Welsh language to all learners.

The number and percentage of learners registered for GCSE Welsh First Language, GCSE Welsh Second Language or not registered for either (table 20)

Year	11 Cohort	1st Language GCSE	2nd Language GCSE	Total	Total % of cohort	% cohort 1st Language GCSE	% cohort 2nd Language GCSE
2020	1513	171	984	1155	76%	11%	65%
2021	1619	196	1061	1257	78%	12%	66%
2022	1593	208	989	1197	75%	13.1%	62.1%
2023	1573	231	859	1089	69.2%	14.7%	54.5%

The number and percentage of enrolled learners who are assessed for A Level and Welsh First Language and Welsh Second Language A levels (table 21)

	A Level 2 <sup>nd</sup> Language	A Level 1st Language
2020	2	5
2021	1	4
2022	1	1
2023	1	2

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- The language category of schools within the authority (table 21)

	Category 1	Category 2	Category 3
2023-2024	45		11

## OUTCOME SUMMARY

- Data Collection  
The Welsh Language Promotion Officer will undertake a data collection exercise in the Autumn term to analyse the data further in order to understand which subjects/ areas of study are showing an increase and decrease in uptake. He will also look at the projected data for the next 3 years with a focus on year 10 and 11 pupils to identify where children are going to study/ trends and the reasons for the choice. This will then feed into the strategic plan for vocational and alternative curriculum provision throughout the local authority.
- Development of bilingual pre vocational 14-16 and vocational pathways for pupils within the Local Authority  
A skills hub targeting pupils from 14 upwards will be built and opened in Ysgol Gymraeg Ystalyfera Bro Dur in March 2025 with emphasis on providing bilingual pre vocational and vocational courses for pupils (bilingual pathways and opportunities will be mapped out for pupils and parents from age 14 upwards). This will be further enhanced with the opening of the bilingual Skills Centre in Port Talbot (9 year rolling programme) in 2027 where a range of vocational pathways will be offered to pupils from the age of 14 upwards. This will enhance the current Welsh-medium vocational offer for pupils as well as assisting in delivering a bilingual Full 14-16 Qualification Offer. A Skills Officer has been appointed to map out current provision, collaborate with schools and the NPT Group of Colleges and coordinate the additional subjects and courses available to students throughout the Local Authority.
- Welsh Science GCSEs and A Levels  
Ystalyfera Bro Dur have started initial discussions in order to increase numbers who choose Science GCSE and Science A level through medium of Welsh in YGYBD (currently English by default and pupils have to opt in for Welsh). By 2025, the default language for Science GCSE will be Welsh and by 2027, the default language for Science A level will be Welsh.
- Partnership work

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Currently there is effective partnership work between Ysgol Ystalyfera Bro Dur and the Urdd (apprenticeship), Swansea University (Welsh-medium ITT students), Coleg Cymraeg Cenedlaethol and Mudiad Meithrin (Cam wrth Gam Childcare courses). Data on uptake is now being monitored and will be collect on an annual basis in order to feed back into future WESP evaluations.

- Discussions with local partnerships to monitor the number of courses offered and uptake through the medium of Welsh and external partnerships

As noted above, a data collection exercise and Skills Strategy involving a range of local partners is underway in order to develop provisions and meaningful pathways to employment (which will include bilingual and Welsh-medium provisions). The Local Authority is also working closely with Meirir Ebbsworth, National Centre for Learning Welsh, on a study that she is currently undertaking around flexible models that would meet the needs of schools in going forward. Although directly linked to Outcome 7, the information will be essential in developing Welsh-medium provision and pathways within both Welsh-medium and English-medium schools.

- e-sgol provision in schools

Currently there is no e-sgol provision within the Local Authority. Officers from the Education and Strategic School Improvement team are attending the e-sgol conference in the Botanical Gardens on July 4<sup>th</sup> in order to gather the information needed to progress with the development of e-sgol within NPT.

- Collaboration with schools to promote the benefits of studying Welsh as a subject among pupils and parents/carers

As noted previously, transition plan for Welsh-medium KS2 to 3 and KS 4 to 5 has been developed with cluster Headteachers and the Welsh Language promotion Officer with the aim of targeting schools with the greatest loss to English-medium education. The plan will be implemented and funded from Cymraeg 2050 element of the LAEG grant funding.

A Welsh Language and Culture roadshow is also being prepared for the forthcoming academic year which will include many partners as well as other organisations i.e. RhAG, Menter Iaith etc. in order to alleviate parental concerns around the language as well as 'myth busting' common misconceptions about Welsh-medium education and the benefits of studying Welsh as a subject. Promotional material including a series of 5 professional videos 'Taith at Ddwy Iaith' which promotes the benefits of bilingualism and Welsh-medium education throughout the Local Authority will be launched in the Autumn term with the aim of promoting Welsh-medium education, learning Welsh as a subject and common 'myth-busting- for parents and pupils.

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- The Outcome 4 sub-group consists of many partners and meet on a regular basis to evaluate progress and set targets and actions arising from the annual plan, the 5 year plan and the 10 year WESP. They support and strengthen the work of the cluster and parents' confidence in the Welsh language.

#### **IMPLEMENTATION AND MONITORING**

Local Authority officers and the *WESP Outcomes* sub-groups are responsible for setting targets and monitoring progress against actions within the 10 year plan, the 5 year plan and the annual plan. A range of quantitative and qualitative data is collected and analysed throughout the year in order to obtain an informed evaluation of progress and to set further targets. Information is shared through regular sub-group meetings and reported back to the full WESP forum annually.

#### **RISKS**

- External partners not delivering Welsh-medium provisions/ courses
- No funding leading to courses (grant funded external providers) not being delivered
- Capacity of small teams/ Welsh-medium staff to continue to deliver growing number of specialist courses.

#### **ASSURANCE / MITIGATION ACTION**

- Keep up to date/ regular meetings with external partners to discuss/ foresee any future delivery issues.
- LA to look into funding structures and programmes to ensure continuation of provision
- Develop internal skills provisions/ delivery within the local authority
- Succession planning in order to identify where biggest staffing pressures exist and what can be done to alleviate them. Feed these targets/ pressures into Outcome 7 targets.

#### **FORWARD LOOK**

- Ensure that courses for the future needs of the workforce are developed (Skills Strategy) and that they are available bilingually.



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## Outcome 5

### More opportunities for learners to use Welsh in different contexts in school

#### KEY ANNUAL DATA

##### Outcome 5 ten year target:

All schools within the Local Authority will be fully engaged with Curriculum for Wales in conjunction with the Siarter Iaith. The Welsh language, contemporary culture and history will be integral to curriculum design. We will see an increase in learner and staff confidence and pride towards being Welsh and the Welsh language. The Welsh language and the associated extra-curricular activities will be inclusive and will radiate into the wider community, allowing all to have access and to develop their Welsh-language skills.

##### Number of primary schools that have received the Siarter Iaith Cymraeg - Gold, Silver and Bronze award (table 22)

	Number of Schools
Gold	3
Silver	5
Bronze	3

##### Number of primary schools that have received Cymraeg Campus - Gold, Silver and Bronze award (table 22)

	Number of Schools
Gold	1
Silver	2
Bronze	20

##### The number/ percentage of English and Welsh primary schools that are part of Siarter Iaith and Cymraeg Campus (table 23)

	Number of schools	% of schools
Siarter Iaith (WM Primary schools)	11	100
Cymraeg Campus (EM Primary Schools)	45	100

##### Number of secondary schools that have received the Siarter Iaith Cymraeg - Gold, Silver and Bronze award (table 24)

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	Number of Schools
Gold	
Silver	
Bronze	1

\*there is only 1 Welsh-medium secondary school in NPT

#### Number of English secondary schools that operate Cymraeg Campus

Currently our secondary schools do not officially operate Cymraeg Campus. An officer from the NPT Education department is a representative on the national *Arweinwyr y Gymraeg* group who are currently revising the structure and will be launching a new reviewed structure in the Spring term 2024. 2 education officers are also representatives on the national Siarter Iaith/ Cymraeg Campus coordinators group. Currently, 2 English-medium secondary schools are working on Cymraeg Campus and are keen to progress with their journey towards the Bronze award.

### **OUTCOME SUMMARY**

- Mapping of activities / opportunities for school-aged children to use their Welsh language skills outside of class and outside of school
- A mapping out exercise of Welsh-medium provision has been completed (by *Fforwm Iaith Abertawe a CNPT*). The map includes information from all parties outlining the activities, providers, age groups, locations, cost and times of events/ activities. It outlines activities suitable for children and young people as well as community activities and online resources. This resource will be shared and used for future planning in schools and communities. Currently, there are 186 activities and resources available. Partners include *Menter Iaith, Mudiad Meithrin, Tŷ'r Gwrhyd, Urdd, Cymraeg i Blant, Technocamps, Dysgu Cymraeg Ardal Bae Abertawe* and *Amgueddfa Cymru*
- *Urdd*- An allocation from the WLGA funding to support the Welsh language in Carmarthenshire and the former industrial heartland areas of the Western Valleys is being used to appoint an Urdd officer to work with the 5 English-medium NPT schools in these areas. The focus will be on developing the Welsh language through activities/ competitions for the Urdd Eisteddfod Dur a Mor, Margam. The Urdd have also held various activities including lunch hour and after school clubs, Eisteddfod promotional visits, sporting competitions and activities, apprenticeship training within secondary schools and for current staff within primary schools, residential visits for both English-medium and Welsh-medium schools as well as community and youth work.
- *WLGA grant funding to support the Welsh language in Carmarthenshire and the former industrial heartland areas of the Western Valleys*- The grant funding will be used to facilitate a number of projects including commissioning a consultant with knowledge of linguistic sensitive areas to work with the Local Authority to

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produce a short term and long term action plan for the Swansea and Amman Valley area. Actions from plan will be evaluated and good practice will be used in other areas within the Local Authority e.g. Dulais Valley, Afan Valley.

The grant will also be utilised to create a Welsh-medium youth package for the Swansea/ Amman Valley areas where there are significant gaps in Welsh-medium provision. This will include employing a Welsh-medium youth officer to facilitate events.

The grant will also facilitate projects and events as noted in the Welsh Language Promotion Strategy and the WESP specifically targeted at the Swansea/ Amman Valley e.g. work with local musicians to provide creative sessions for young people, homework help for parents, family activity sessions/ days e.g. fun days, singing sessions, social events for primary and secondary age children etc.

- Evaluation of the impact of Siarter Iaith (including Cymraeg Campus)

As noted above, currently all schools in NPT are part of the Siarter Iaith/ Cymraeg Campus with a significant increase in bronze/ silver/ gold awards since the last academic year (45 English-medium schools and 11 Welsh-medium schools). One secondary school is part of the Siarter Iaith with 2 English-medium secondary schools eager to work towards the bronze award.

A new Welsh-medium Education Support Officer has been appointed with specific responsibility for the Siarter Iaith. Throughout the year, there has been extensive training for all Welsh-medium school staff on the new Siarter Iaith framework. Also, online Siarter Iaith co-ordinators meetings have been held (2 meetings to date) in order to provide up to date information, facilitate networking and to verify awards. In the last academic year, the Siarter Iaith Education Support Officer has made over 30 visits to Welsh language schools to support the accreditation process and validate awards. Also, over 30 visits have been made to Welsh-medium schools to assist with training.

The Welsh in English-medium (W(Em)) team fully support Cymraeg Campus within English-medium schools as a **whole-school** initiative which aims to create a Welsh ethos in our schools by including all stakeholders in the creation of that ethos. The W(Em) team work alongside Siarter Leaders, the Criw Cymraeg and other stakeholders (i.e. breakfast club and lunchtime staff / playground supervisors / office staff...) to ensure that age - appropriate **Cymraeg Bob Dydd** is used by all, regularly and effectively. The following Siarter Iaith/ Cymraeg Campus training has been provided by the W(EM) team for English-medium school throughout the year:

- New Siarter Iaith Framework course for all Coordinators (Spring term 2024)
- New Siarter Iaith training for HTs (LLAN- May 2024)

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- Activities to support learners to make continued progress

- *Residential visit*- The Welsh-medium Education Support officers have planned and hosted the Welsh Schools Cluster trip to Llanrannog. Over 300 children from our Welsh schools came together to enjoy and socialise through the medium of the Welsh language. The majority of these children come from English speaking households and therefore do not get to socialise through the medium of Welsh for long periods of time.

- *Local Authority Support*- The Welsh-medium Education Support officers and schools have also worked with the Urdd Officer (West Glamorgan) to facilitate a range of events e.g. the Primary Welsh Jamboree; Urdd Welsh Gig for the cluster schools and beyond; pupils have competed in the Urdd Meifod Eisteddfod as cluster schools. We have also been involved in facilitating preparations for this year's Urdd by assisting in the provision of the District and County Eisteddfodau. The Welsh-medium Education Support Officer has been delivering a diverse programme of Welsh language learning and reinforcement, such as: 'Drilio Disglair' language plan; 'Sgleinio ein Sgwrsio' and recently, investment from the Cymraeg 2050 LEAG grant funding has led to the roll out the 'Coeden Aled' programme in all our Welsh-medium schools to support inclusive learning for ALN pupils.

A 'Language Conference' was held by the Welsh-medium cluster schools with the aim of raising writing standards. Experts came to present during the conference, such as Delyth Owen from Coeden Aled/Treehouse Tales and Hanna Hopwood, Stori'r Iaith and Atebol. There were language presentations by Rhys Locke on the development of learners' reading skills through Pie Corbett techniques and a presentation by Sara Bowkett on 'Brawddegau Bendigedig'. A further Cluster Conference (HMS) will be held in the Summer term with a focus on developing our learners' reading skills.

- *Cynefin*- In response to the significance of CYNEFIN within the Curriculum for Wales and the expectation for cynefin to be *driver for all topics and themes* in our classrooms (Estyn) the W(Em) team have provided support in the following ways:

- CDO organised a 10 week CYNEFIN project (2021-22) involving the Coordinator from 3 NPT schools (Baglan, Melin and Rhos) and the three TDOs during which they studied the Cynefin of the 3 schools.
- Cynefin websites for the 3 schools were created and shared with HTs and Coordinators during CYNEFIN courses in the Summer and Autumn terms 2022.
- A Cynefin Lead was appointed in September 2022
- All clusters received Cynefin training from the Cynefin Lead in Autumn 2022 and Spring 2023. The most recent training was also provided in the Autumn term 2023. Courses were run for all English-medium clusters with a 100% attendance record.

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- Cynefin teams have been established in many NPT schools and a W(EM) officer continues to provide support with the development of their websites. 9 schools have now published their CYNEFIN websites. 10 schools are currently working on their websites.
- A Traed, Cam, Naid approach to planning and teaching is advocated by the W(Em) team and exemplar resources have been produced and shared by the CDO and TDO during Coordinator training courses.

Further Welsh language training for English-medium staff is outlined in detail in the Outcome 7 progress report.

- *Resources for English-medium schools*-The W(Em) team have created a large bank of resources on the NPT sharepoint on the HWB but continue to respond to need and provide new resources for schools based on their current themes/ concepts. The team are constantly creating when a need arises. New GWRANDO resources have been prepared this year to support teachers who need to develop the new skill of translanguaging in their classrooms.
- *Menter Iaith* have held various activities throughout the year in both Welsh-medium and an increasing number of English-medium schools including after school clubs, silent discos, Gig Tanio'r Ddraig, supporting the Urdd Eisteddfod work, Clwb Cinio Cymraeg, music/instrument/ singing sessions, Cwis Dim Clem (1<sup>st</sup> and 2<sup>nd</sup> language Welsh pupils), Caffi Cymraeg (for parents and wider community), benefits of bilingualism promotional packs and videos on social media, attended many open evenings in schools to promote Welsh language activities.
- *Tŷ'r Gwrhyd* in Pontardawe continue to offer Welsh language courses to the wider community, story sessions and *Clwb Darllen*, a Welsh book shop and hosts various Welsh-medium community groups including *Merched y Wawr* and *Cylch Ti a Fi Pontardawe*.

- Provision for latecomers

'Y Cwm', the latecomer provision based in YGG Pontardawe continues to be successful. This academic year, we have accepted pupils from Powys (Ysgol Dyffryn y Glowyr) with the aim of ensuring that these pupils will be confident to transition to Ysgol Gymraeg Ystalyfera Bro Dur North Campus. It is possible that pupils from Ysgol Y Cribarth will be able to access the provision in the following years in order to assist with their transition to dual stream, again with the aim of increasing the number of pupils transitioning to Welsh-medium secondary education.

The second immersion centre based in the new YGG Rhosafan in the south of the Local Authority will open in 2026. This will allow more pupils to access the provisions as well as significantly reducing the current transport costs.

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- Developing Welsh in English-medium schools

*Welsh in English medium Team (W(Em))*-The Welsh in English medium team (W(Em)) consists of one Curriculum Development Officer, 1 Deputy Curriculum Development Officer (temporary position from September 2024- April 2025) and 2 Teacher Development Officers. The CDO is responsible for making all the key decisions regarding the delivery of Welsh in English-medium schools in NPT. The CDO manages the W(Em) team and informs and trains the TDOs to ensure a common approach and to maintain standards. The TDO produces and provides all teacher training (e.g. methodology courses / centralised training sessions / Welsh Coordinator training / Siarter Iaith Cymraeg Campus training. The CDO liaises with outside agencies (Yr Urdd / Menter iaith / Rhagoriaith / Peniarth / UWTSD Sabbatical team / Swansea University Dysgu Cymraeg Bae Abertawe) and other counties (Swansea, Powys and Penfro) and represents the interests of NPT in meetings / forums. The CDO is responsible for verifying Siarter Iaith Cymraeg Campus schools and compiling all verification reports (this duty will be gradually transferred to the Deputy CDO from September 2024). The Deputy CDO is also the Cynefin Lead for NPT and responsible overseeing the WHSi award in NPT. Details of training and staff development in English-medium schools can be seen above and also in Outcome 7.

*National Centre for Learning Welsh*- The Local Authority is currently working closely with the National Centre for Learning Welsh with the aim of transitioning one English-medium cluster along the language continuum. Currently 4 staff members from Cefn Saeson Comprehensive School are half way through the new pilot for language acquisition and have attended the first block of residential in Nant Gwrtheyrn. It is our aim to work closely with the National Centre for Learning Welsh to develop a Welsh speaking community within the Cefn Saeson feeder cluster primaries. This will ensure pupil transition and progression from primary to secondary as well as forming a natural cluster support group for staff in both the primaries and secondary cluster schools.

- Celebrating and publicising success locally through the media and social media and also shared good practice between schools within and wider through HWB

The Welsh cluster has a HWB network to share new literacy resources. All resources are also shared on the NPT portal on HWB and all schools have access to this. We celebrate the successes of all our cluster schools through our 'X' page 'Seren a Sbarc CNPT'. In addition, the cluster schools are regular contributors to CIP magazine and the Urdd's IAW. Successes of all schools are also publicised and promoted on the NPT social media pages.

- Helping parents understand the aims of the Siarter Iaith and the role they could play in supporting their children/ young people to use Welsh informally at school, home and in the community

Remember to delete the *blue text* before submitting your review report.

The Welsh-medium Education Support Officer facilitates 'Caffi Cymraeg' (Welsh Café) for current and prospective parents and carers to support the development of their Welsh language skills on a weekly basis. The Officer has also been responsible for delivering presentations during open mornings and evenings in the cluster schools on the importance of bilingualism, 'Sut i gaffael yr Iaith Gymraeg' (How to acquire the Welsh language), as well as delivering presentations on 'Reading tips and literacy at home'. Also, the Officer has recently led on a two night re-launch of 'Siarter Iaith' within the Local Authority.

As noted in Outcome 1, promotional videos have been created which promote the benefits of bilingualism and Welsh-medium education and will be launched in the autumn term. These videos will be key in addressing the concerns and questions of parents of pupils in schools moving along the language continuum.

- The Outcome 5 sub-group consists of partners (many named above) and meet on a regular basis to evaluate progress and set targets and actions arising from the annual plan, the 5 year plan and the 10 year WESP. These partners play a key role in delivering the activities within our schools.

#### **IMPLEMENTATION AND MONITORING**

Local Authority officers and the *WESP Outcomes* sub-groups are responsible for setting targets and monitoring progress against actions within the 10 year plan, the 5 year plan and the annual plan. A range of quantitative and qualitative data is collected and analysed throughout the year in order to obtain an informed evaluation of progress and to set further targets. Information is shared through regular sub-group meetings and reported back to the full WESP forum annually.

#### **RISKS**

- External partners not delivering Welsh-medium provisions/ courses/ activities
- No funding leading to courses/ activities (grant funded external providers) not being delivered
- Capacity of small teams/ Welsh-medium staff to continue to deliver growing number of activities/ provisions

#### **ASSURANCE / MITIGATION ACTION**

- Keep up to date/ regular meetings with external partners to discuss/ foresee any future delivery issues.
- LA to look into funding structures and programmes to ensure continuation of provision

Remember to delete the *blue text* before submitting your review report.

- Develop internal provisions/ delivery within the local authority

#### **FORWARD LOOK**

- Continue to build on the success of this year's Siarter Iaith and Cymaraeg Campus with more schools gaining the bronze/ silver/ gold awards.
- Work with all schools to partake in the Urdd Eisteddfod in Margam.
- Continue to work with a cluster of English-medium schools to move along the language continuum.



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## Outcome 6

An increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN) in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018

### KEY ANNUAL DATA

#### Outcome 6 ten year target:

All pupils with ALN within the local authority will have access to provision at all levels through the medium of Welsh. Collaboration with regional partners will provide a comprehensive range of resources, training opportunities and networking to ensure that Welsh-medium provision will be of a high standard and complies with the Additional Learning Needs and Educational Tribunal Act (Wales) 2018. Early Years and pre-school WM ALN support, assessments and provision will provide increased confidence in parents when choosing Welsh-medium education for their children.

The number and percentage of learners with ALN/ SEN by medium of school using PLASC data (table 25)

	Welsh-medium		English-medium	
	number	%	number	%
PLASC 2022	417	11.9	3873	21.9
PLASC 2023	327	9.2	2976	17.1
PLASC 2024	266	7.6	2533	14.7

### OUTCOME SUMMARY

- Progress against your duty under section 63 of the Additional Learning Needs Act and the Education Tribunal (Wales) 2018 to review your Welsh-medium education ALN provision and mapping exercises to develop and prioritise resources
- *Datblygiad Addysg cyfrwng Cymraeg Cynhwysfawr (DACC) steering group-* One of the core aims of the ALN Act is to create a bilingual system of support for ALN. A series of strategic duties are aimed at driving progress towards a bilingual ALN system. In response, NPT continue to implement the steering group for the development of inclusive Welsh-medium education (Grŵp Lliwio\_Datblygiad Addysg cyfrwng Cymraeg Cynhwysfawr /DACC). The DACC group continue to drive the targets for Outcome 6. The group continue to review Welsh-medium provision and identify resources, training and development required within the Welsh-medium sector. This ensures an equitable offer for Welsh-medium pupils and continuity in their journey in Welsh education, particularly during transition points. In the last academic year, the DACC group have developed literacy

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provision and resources that has facilitated a consistent approach in identifying and supporting literacy difficulties through the medium of Welsh. During the Autumn term, the seconded staff launched the newly developed literacy resource pack (Pecyn Cymorth Llythrennedd) to all Welsh-medium cluster schools. This resource was shared cross county with neighbouring schools in Powys. The DACC lead is also currently collaborating with Cardiff university in developing national standardized ALN assessments through the medium of Welsh. Welsh-medium cluster INSET days have been arranged with a focus on developing ALN strategies through the medium of Welsh delivered by leading national ALN professionals. Termly DACC meetings will continue as the review of provision available through the medium of Welsh is ongoing as resources develop and approaches to ALN evolve. Membership of the DACC group includes ALNCos from both primary and secondary, Education Support Officers, Specialist Teachers, Educational Psychologists and the Welsh Language Promotion Officer. The DACC group is therefore able to link their review of ALP with wider strategic duties including those under the School Standards and Organisation (Wales) Act 2013, and Welsh in Education Strategic Plans (WESPs).

- Myth busting- In line with developing the resources for the Welsh-medium promotional campaign, officers are in the process of developing and promoting ALN myth busting materials including roadshows and videos. This will be launched early in the Autumn term.
- ALN Capital Grant- Significant investment from the 2024 ALN Capital Grant has been submitted to Welsh Government for approval. This will include development of a sensory outdoor area for the new Welsh-medium provision in YGG Trebannws as well as other provisions and resources in all of our Welsh-medium schools.
- Welsh-medium Learning Support Centres
  - YGG Rhosafan- The new Welsh-medium 16 place Learning Support Centre included in new build YGG Rhosafan (Sustainable Schools Challenge) is currently being designed and developed with architects and contractors. The design stage will be completed by the end of 2024 with the aim of completing the build by Summer 2026. Occupation of the new LSC will be in September 2026. Formal consultation for the new Welsh-medium LSC will commence in Spring 2025.
  - YGG Trebannws- work on establishing a Welsh-medium learning support centre at YGG Trebannws is developing. This is a gradual, steady process transitioning from the predominantly English-medium previous provision to a bilingual provision and eventually to a fully Welsh-medium provision. Currently, only Welsh language pupils are being placed in the provision with 2 English-medium pupils remaining in upper KS2. It is expected that the last cohort of English pupils will transition to secondary provision by September 2025. Formal consultation to transition to a Welsh-medium Learning Support Centre will commence in 2025.

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-Secondary Welsh-medium ALN provision- work on establishing secondary Welsh-medium ALN provision in Ysgol Gymraeg Ystalyfera Bro Dur (north and south sites) has started. This will ensure a planned pathway for pupils with ALN from primary (YGG Trebannws in the north and YGG Rhosafan in the south) to secondary education.

- The Outcome 6 sub-group are members of the DACC steering group and consists of many partners (named above). They meet on a termly basis to evaluate progress and set targets and actions arising from the DACC action plan, the WESP annual plan, the 5 year WESP plan and the 10 year WESP. These partners play a key role in developing and delivering the activities and resources within our schools.

## **IMPLEMENTATION AND MONITORING**

Local Authority officers and the *WESP Outcomes* sub-groups are responsible for setting targets and monitoring progress against actions within the 10 year plan, the 5 year plan and the annual plan. A range of quantitative and qualitative data is collected and analysed throughout the year in order to obtain an informed evaluation of progress and to set further targets. Information is shared through termly sub-group meetings and reported back to the full WESP forum annually.

## **RISKS**

- No grant funding or late offer of grant funding leading to projects not being delivered within the grant period.
- External pressures and influences impacting on project progress.
- Capacity of small teams/ Welsh-medium staff to continue to deliver growing number of projects.

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<b>ASSURANCE / MITIGATION ACTION</b>
<ul style="list-style-type: none"><li>• LA to look into funding structures and programmes to ensure continuation of provision.</li><li>• Effective planning to meet statutory timelines, collaborating with other services to share responsibilities, good practice</li><li>• Succession planning in order to identify where biggest pressures exist and what can be done to alleviate them. Feed these targets/ pressures into Outcome 7 targets.</li></ul>
<b>FORWARD LOOK</b>
<ul style="list-style-type: none"><li>• Completion of consultation process for YGG Trebannws, YGG Rhosafan and Ysgol Ystalyfera Bro Dur Welsh-medium LSCs</li><li>• Further research, resource and training development from DACC group to ensure provision of the highest quality in both mainstream and specialist provisions</li><li>• Further development of the YGG Rhosafan LSC new build</li></ul>

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## Outcome 7

Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh

### KEY ANNUAL DATA

#### Outcome 7 ten year target:

An increased number of the NPT education staff will be able to teach through the medium of Welsh and Welsh as a subject. There will be an increase in Welsh-medium staff able to teach specific subjects at secondary level. There will be an increase in the number, ability and confidence of staff in English-medium schools able to converse and teach Welsh, therefore increasing the amount of learners with access to Welsh-medium education at all levels throughout the Local Authority. NPT will attract and recruit excellent, bilingual leaders for our schools. All NPT schools will form communities that promote the Welsh language as a medium for education and community life.

#### Annual School Workforce Census Data (table 26)

SWAC - Welsh Language Ability - Teachers																
SWAC Year	School Teaching Staff (Numbers)								School Teaching Staff (%)							
	W1 - No Welsh Skills	W2 - Entry Level	W3 - Foundation Level	W4 - Intermediate Level	W5 - Advanced Level	W6 - Proficient Level	W7 - Not Obtained	Total	W1	W2	W3	W4	W5	W6	W7	
2019	252	269	270	92	57	234	8	1182	21.3%	22.8%	22.8%	7.8%	4.8%	19.8%	0.7%	
2020	254	275	276	99	58	249	1	1212	21.0%	22.7%	22.8%	8.2%	4.8%	20.5%	0.1%	
2021	240	311	276	105	58	257		1247	19.2%	24.9%	22.1%	8.4%	4.7%	20.6%	0.0%	
2022	233	306	283	103	58	249		1232	18.9%	24.8%	23.0%	8.4%	4.7%	20.2%	0.0%	
2023	240	284	273	92	52	262		1203	20.0%	23.6%	22.7%	7.6%	4.3%	21.8%	0.0%	

SWAC - Welsh Language Ability - Non Teachers																
SWAC Year	School Non Teaching Staff (No's)								School Non Teaching Staff (%)							
	W1 - No Welsh Skills	W2 - Entry Level	W3 - Foundation Level	W4 - Intermediate Level	W5 - Advanced Level	W6 - Proficient Level	W7 - Not Obtained	Total	W1	W2	W3	W4	W5	W6	W7	
2019	493	302	100	18	28	125	8	1074	45.9%	28.1%	9.3%	1.7%	2.6%	11.6%	0.7%	
2020	652	314	109	23	24	134	4	1260	51.7%	24.9%	8.7%	1.8%	1.9%	10.6%	0.3%	
2021	693	337	109	22	25	139	2	1327	52.2%	25.4%	8.2%	1.7%	1.9%	10.5%	0.2%	
2022	702	362	97	25	31	136	4	1357	51.7%	26.7%	7.1%	1.8%	2.3%	10.0%	0.3%	
2023	724	370	94	32	21	145		1386	52.2%	26.7%	6.8%	2.3%	1.5%	10.5%	0.0%	

SWAC - Teaching/Working Through the Medium of Welsh - Teachers														
SWAC Year	School Teaching Staff (Numbers)						School Teaching Staff (%)							
	T1 - Teach/work in Welsh in current post	T2 - Able to teach/work in Welsh but not doing so in current post	T3 - Not able to teach/work in Welsh	T4 - Teaching Welsh as a subject only	No Answer	Total	T1	T2	T3	T4	No Answer			
2019	205	81	442	447	7	1182	17.3%	6.9%	37.4%	37.8%	0.6%			
2020	218	77	448	468	1	1212	18.0%	6.4%	37.0%	38.6%	0.1%			
2021	224	73	468	482		1247	18.0%	5.9%	37.5%	38.7%	0.0%			
2022	226	75	448	483		1232	18.3%	6.1%	36.4%	39.2%	0.0%			
2023	221	80	447	455		1203	18.4%	6.7%	37.2%	37.8%	0.0%			

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SWAC - Teaching/Working Through the Medium of Welsh - Non Teachers												
SWAC Year	School Non Teaching Staff (Numbers)						Total	School Non Teaching Staff (%)				
	T1 - Teach/work in Welsh in current post	T2 - Able to teach/work in Welsh but not doing so in current post	T3 - Not able to teach/work in Welsh	T4 - Teaching Welsh as a subject only	No Answer	T1		T2	T3	T4	No Answer	
2019	119	46	685	219	5	1074	11.1%	4.3%	63.8%	20.4%	0.5%	
2020	136	42	860	221	1	1260	10.8%	3.3%	68.3%	17.5%	0.1%	
2021	136	36	928	227		1327	10.2%	2.7%	69.9%	17.1%	0.0%	
2022	138	44	953	222		1357	10.2%	3.2%	70.2%	16.4%	0.0%	
2023	137	45	999	205		1386	9.9%	3.2%	72.1%	14.8%	0.0%	

T1 Teaching/Working through the medium of Welsh in current post

T2 Able to teach/work through the medium of Welsh but not doing so in current Post

T3 Not able to teach/work through the medium of Welsh

T4 Teaching Welsh as a subject only

Numbers undertaking a sabbatical course, or any other tailored Welsh course for teachers, offered through the National centre for learning Welsh (table 27)

	Number of teachers
2021-2022	3
2022-2023	6
2023-2024	2 (number accepted on next course)
2024-2025	3 (6 applied)

Number of staff on the National Centre for Learning Welsh Pilot- Welsh language Entry Level (table 28)

	School	Number of staff
2024	Cefn Saeson Secondary	4

Support visits to English-medium primary schools from Welsh in English-medium support staff 2022-2023

3 Teacher Development Officers (Welsh in English-medium team) are responsible for 15 English-medium schools each. The TDOs provide support visits for all 15 schools. A *minimum* of 3 visits per term is provided for every school with additional

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*targeted* visits provided for schools who request / require additional help / support. Schools in line for an Estyn visit will also be offered additional support.

#### Training for English-medium school staff- Welsh language and delivering of Welsh language

As well as the course offered last year, the following training has been carried out this academic year:

- New Coordinator courses (Autumn term 2023 & Spring term 2024)
- Centralised GWRANDO adds
  
- Centralised DRILIO adds
- Centralised DARLLEN adds

Centralised YSGRIFENNU adds are to be offered by the CDO from September 2024 as the final step in the curriculum skills training.

The following **Siarter Iaith** training has been provided by The CDO during the 2023-24 academic year.:

- New Siarter Iaith Framework course for all Coordinators (Spring term 2024)
- New Siarter Iaith training for HTs (LLAN- May 2024)

The following **in-house training** for schools has been provided by TDOs:

- *Mop-up* Tric a Chlic (phonics) training continues to be provided in-house for Reception / Year 1 / Year 2 teachers by the TDOs in response to individual school's needs.

The following training has been provided by external agencies:

- Termly Welsh Language Courses for N/R 1/2 3/4 5/6 (this provision is under review due to the continued disappointing response which is not in line with the normal excellent take up for all other Welsh courses.)
- Cymraeg bob Dydd course for teachers
- Cymraeg Bob Dydd course for TAs

(Provider – Swansea University – Dysgu Cymraeg Bae Abertawe)

- Sabbatical course – Foundation
- Sabbatical course – Intermediate (Provider UWTSDBee – Rhagoriaith)
- Ffa Ia training - Autumn term 2024 (Provider – Carys Gwent)

#### **OUTCOME SUMMARY**

- Development in the Welsh in English-medium team

The Welsh (English medium) team consists of one Curriculum Development Officer, 1 Deputy Curriculum Development Officer (temporary position from September 2024- April 2025) and 2 Teacher Development Officers. The CDO is

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responsible for making all the key decisions regarding the delivery of Welsh in English-medium schools in NPT. The CDO manages the W(Em) team and informs and trains the TDOs to ensure a common approach and to maintain standards. The TDO produces and provides all teacher training (e.g. methodology courses / centralised training sessions / Welsh Coordinator training / Siarter Iaith Cymraeg Campus training. The CDO liaises with outside agencies (Yr Urdd / Menter iaith / Rhagoriaith / Peniarth / UWTSD Sabbatical team / Swansea University Dysgu Cymraeg Bae Abertawe.) and other counties (Swansea, Powys and Penfro) and represents the interests of NPT in meetings / forums. The CDO is responsible for verifying Siarter Iaith Cymraeg Campus schools and compiling all verification reports (this duty will be gradually transferred to the Deputy CDO from September 2024). The Deputy CDO is also the Cynefin Lead for NPT and responsible overseeing the WHSi award in NPT.

- Planning for future workforce needs

Currently, work is ongoing to assess the workforce needs for Welsh-medium education within the Local Authority. A primary needs analysis for the next 5 years can be seen in the table below:

Welsh-medium workforce needs (table 29)

Headteachers	Teachers	Teaching Assistants
3	12	14

Work on assessing secondary provision workforce needs is ongoing with the development of the NPT Skills Strategy and the opening of a bilingual Skills Centre for 14-16 year olds in 2027 (9 year rolling programme project developed to SOC level). It is expected that an additional 9 bilingual specialist skills teachers will be needed when the Skills Centre opens in September 2027. Currently, a skills co-ordinator has been appointed and will work with schools and Neath Afan College to develop the specialist workforce needed for the 14-16 vocational Skills Centre (in line with the Full 14-16 Qualification Offer).

As noted above, 4 senior teachers from Cefn Saeson Comprehensive School are attending the Welsh language pilot run by The National Centre for Learning Welsh with the aim of moving along the language continuum and developing a community of Welsh speaking teachers within the school. The longer term aim is to roll out these courses to the Cefn Saeson cluster primary schools in order to move the whole cluster along the continuum from a category 1 to 2.

Future national developments and opportunities will be considered alongside local need in order to identify short term and long term plans for addressing vacancies and increasing the number of staff needed in schools, skills centres and ALN provisions.

- Planning to ensure that Welsh speaking central staff are allocated to Welsh-medium schools



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Work on re allocating Welsh speaking staff within departments to Welsh-medium schools is ongoing. Due to staff turnover and reorganisation as a result of budget pressures, this is an ongoing project that needs to be reviewed on a regular basis. Welsh speaking ALN support is allocated to Welsh-medium schools. This reorganisation within departments assists in identifying gaps and future workforce needs. The DACC group discuss and address any future workforce need and gaps in provision during their termly meetings.

- Partnership

- *Swansea University and Academi Hywel Teifi-* YGYBD are working closely with PGCE students from Swansea University's School of Education ITE programme and Academi Hywel Teifi to train and promote teachers in Welsh-medium education. Students were placed in WM settings (YGYBD secondary phase sites) through this partnership with a focus on subject needs within the workforce i.e. Welsh, English, biology, chemistry, physics, MFL, mathematics, DT and computer science.
- *National Centre for Learning Welsh-* The Local Authority is currently working closely with the National Centre for Learning Welsh with the aim of transitioning one English-medium cluster along the language continuum. Currently 4 staff members from Cefn Saeson Comprehensive School are half way through the new pilot for language acquisition and have attended the first block of residential in Nant Gwrtheyrn. It is our aim to work closely with the National Centre for Learning Welsh to develop a Welsh speaking community within the Cefn Saeson feeder cluster primaries. This will ensure pupil transition and progression from primary to secondary as well as forming a natural cluster support group for staff in both the primaries and secondary cluster schools.
- *Colegau Cymraeg Cenedlaethol-* The Local Authority is currently working with Colegau Cymraeg Cenedlaethol with a specific emphasis on Ysgol Gymraeg Ystalyfera Bro Dur current and past pupils in order to recruit into Welsh-medium education.
- *Llywodraeth Cymru-* Grant datblygu capasiti'r gweithlu addysg cyfrwng Cymraeg.. 2023-2024, Ysgol Gymraeg Ystalyfera Bro Dur were awarded £37,360 with the following focus:
  - Recruit apprentices or Learning Assistant
  - Training for staff to learn other topics
  - Allowance to retain IT staff and Physics
  - Network development "Anelu am Addysg"

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As a result of the grant funding, 2 apprentices were appointed to train as Teaching Assistants. Both have since been appointed as TAs in the school to commence in September 2024. One of the apprentices will continue to study alongside his TA role in order to qualify as a teacher.

4 members of staff are being trained to teach additional subjects. These include Travel and Tourism, Geography, Humanities and Business.

The school managed to retain two members of staff in the profession by offering them TLR 3 allowance taking on leadership roles in difficult subjects to fill: Physics and Information Technology. As a result, the numbers of pupils taking GCSE and A Level Physics and Information Technology has increased.

The 'Anelu am Addysg' network is developing with staff having non-contact time to facilitate the project and to work with other schools. A calendar of work experiences has been scheduled with an emphasis on encouraging pupils into the field of education.

This year, Ysgol Gymraeg Ystalyfera Bro Dur has been awarded a grant of £30,875 to develop workforce capacity with the following focus:

- Expand subject range through professional learning
  - Develop International Languages (MFL provision)
  - Attracting alumnae/ past pupils
- Progression for students to continue with learning and identify any investment by schools to facilitate this.

Significant funding from the Cymraeg 2050 element of the LAEG has been invested in this element (£30,000) in order to produce and implement a transition plan for pupils and Key Stages, including post 16 pupils in order to ensure that they continue learning through the medium of Welsh. Further investment has been made by Ysgol Gymraeg Ystalyfera Bro Dur by providing the Mudiad Meithrin Cam wrth Gam courses for pupils. This has proved very successful with many of the cohorts completing the course finding employment within the cluster.

- It is important to note that careful short term and long term planning as well as extensive internal and external partnership work is needed for this outcome. As a result, work on Outcome 7 of the WESP plan has centred on building these partnerships. Detailed short term and long term aims will be set as a result of ongoing projects with our partners and will be fed into the annual plans. The Outcome 7 sub-group consists of many of these partners and will meet on a regular basis to evaluate progress and set further targets and actions arising from the annual plan, the 5 year plan and the 10 year WESP.

## **IMPLEMENTATION AND MONITORING**

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Local Authority officers and the *WESP Outcomes* sub-groups are responsible for setting targets and monitoring progress against actions within the 10 year plan, the 5 year plan and the annual plan. A range of quantitative and qualitative data is collected and analysed throughout the year in order to obtain an informed evaluation of progress and to set further targets. Information is shared through regular sub-group meetings and reported back to the full WESP forum annually.

### **RISKS**

- External pressures and influences impacting on project progress.
- External partners not delivering Welsh-medium provisions/ courses/ training.
- No funding leading to courses/ training (grant funded external providers) not being delivered
- No capacity/ funding in schools to release staff for training

### **ASSURANCE / MITIGATION ACTION**

- Keep up to date/ regular meetings with external partners to discuss/ foresee any future delivery issues.
- LA to look into funding structures and programmes to ensure continuation of provision and release of staff to undertake training.
- Develop internal provisions/ delivery within the local authority.
- Succession planning in order to identify where biggest pressures exist and what can be done to alleviate them. Feed these targets/ pressures into future Outcome 7 annual targets.

### **FORWARD LOOK**

- Continue to develop the Cefn Saeson Secondary School staff to form a community of Welsh speaking staff to move the school along the language continuum
- Identify and work with primary schools in the Cefn Saeson cluster to move along the continuum in order to ensure a clear progress pathway along the language continuum
- Continue to identify and work with external providers to assist with targets as set out in The Welsh Language Education Bill.
- Continue to develop Welsh language internal staff to support schools.

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# Neath Port Talbot Welsh in Education Strategic Plan

## 5 Year Plan 2022-2027

To deliver NPT's 5 year Welsh in Education Strategic Plan (WESP)

Objective	Action	Working Party /Partners/ responsibilities	Timescales/	Current position On target/ completed Requires further work/ ongoing Not on target/ yet to start
<b>1. More nursery children/ three year olds receive their education through the medium of Welsh</b>				
Collect data and identify gaps 341	<ul style="list-style-type: none"> <li>Analyse data from 2022 Childcare Sufficiency Assessment and the Early Years Flying Start expansion plan</li> </ul>	Outcome 1 working party/ Early Years Officers/ Mudiad Meithrin	Sep 2023	
	<ul style="list-style-type: none"> <li>Identify geographical gaps in Welsh-medium and bilingual childcare provision including wraparound, 30 hours offer and Flying Start expansion</li> </ul>		Sep 2023	
	<ul style="list-style-type: none"> <li>Ensure that Welsh-medium pre-school provision is available throughout the county</li> </ul>		Sep 2027	
Promotion and Partnership work	<ul style="list-style-type: none"> <li>Promote partnership work with Midwifery and Health Visitors to assist early messages about the Welsh Language and bilingualism</li> </ul>	Outcome 1 working party/ Early Years Officers/ Health, Swansea University/ Academi Hywel Teifi/ Menter Iaith/ RhAG/	Sep 2024	
	<ul style="list-style-type: none"> <li>Create information booklets providing information on the benefits of bilingualism and addressing common fears will be created and used by the partners from initial perinatal communication with parents</li> </ul>		Sep 2023	
	<ul style="list-style-type: none"> <li>Create and launch a Welsh-medium Education platform on the NPT web site to promote, signpost and assist parents and pupils</li> </ul>		Sep 2024-Sep 2025	

Page 34	<ul style="list-style-type: none"> <li>Plan and establish effective partnership work with Swansea University/ Academi Hywel Teifi-embed the promotion of bilingualism into the midwifery course currently running at the University.</li> </ul>		Sep 2025	
	<ul style="list-style-type: none"> <li>Map out training from Cefin Campbell on the benefits of the Welsh language and bilingualism- start rolling this out to staff working within EY in NPT, LA and Health (including SALT), childcare sector etc.</li> </ul>		Sep 2024	
	<ul style="list-style-type: none"> <li>Develop a package/ strategy to promote the importance of transferring between Cylchoedd Meithrin and Welsh-medium primary schools and signpost clear progression routes in Welsh-medium education from childcare through to post-16 for all families.</li> </ul>		Sep 2025	
	<ul style="list-style-type: none"> <li>Review and amend the online admissions process in partnership with the admissions team for the process of applications for Nursery and Reception, so that information is strategically placed throughout the online application system to ensure families are able to make informed decisions about the language of provision they want for their child</li> </ul>		Sep 2023-ongoing	
Open new Welsh-medium Primary school and childcare facility within the LA	<ul style="list-style-type: none"> <li>Identify area and site for new WM primary school and childcare facility</li> </ul>	Outcome 1 working party/ LA Officers- SSIP, Education/ Early Years Officers/ Headteacher	Jan 2022	
	<ul style="list-style-type: none"> <li>Consultation process to obtain member approval</li> </ul>		Sep 2022	
	<ul style="list-style-type: none"> <li>Promotion of new school within the area and the wider community</li> </ul>		Sep 2022-ongoing	
	<ul style="list-style-type: none"> <li>Refurbishment work to existing building</li> </ul>		Sep 2022-ongoing	
	<ul style="list-style-type: none"> <li>Tender process and appoint childcare provider for the facility</li> </ul>		Sep 2022	
	<ul style="list-style-type: none"> <li>Appoint staff- Headteacher, teaching staff, TA's, admin, caretaker to be appointed</li> </ul>		Oct 2022	
	<ul style="list-style-type: none"> <li>Open new WM primary school to pupils</li> </ul>		Jan 2023	
	<ul style="list-style-type: none"> <li>Work in partnership with RLDP officers to identify a site for a second WM primary school within the LA</li> </ul>		Sep 2022-ongoing	

Numbers and % of 3-year olds receiving their education through the medium of Welsh

2022 - 2023		2023 - 2024		2024 - 2025		2025 - 2026		2026 - 2027	
311	21.4%	331	22.8%	351	24.2%	370	25.5%	389	26.8%

**2. More reception class children/ five year olds receive their education through the medium of Welsh**

<b>Data collection and information gathering</b> Page 343	<ul style="list-style-type: none"> <li>Review the demand for provision for Welsh-medium education on an annual basis-historical and projected data and surplus places</li> </ul>	Outcome 2 working party/LA Officers/ PENTAN/ Menter laith/ RhAG	Sep 2023-Sep 2027	
	<ul style="list-style-type: none"> <li>Create parental survey to gather information on reasons for choosing WM education, confidence levels etc. Analyse the results (with specific attention given to school within the Swansea Valley with poor transition rates)</li> </ul>		Sep 2023-ongoing	
	<ul style="list-style-type: none"> <li>Draft appropriate action plans to address and create demand in specific areas and within specific groups, including addressing surplus places in the north of the LA</li> </ul>		Sep 2023-ongoing	
<b>Continuum of staff training for EM schools</b>	<ul style="list-style-type: none"> <li>Identify 4 pilot schools, 2 primary, 2 secondary with the aim of mapping out a continuum of staff training to be able to eventually create a category 2 stream within an English-medium school</li> </ul>	Outcome 2 working party/LA Officers/ Schools involved	Jan 2023	
	<ul style="list-style-type: none"> <li>Agree upon specific quantitative data, targets and timescales for actions with all pilot schools in line with their need and current resources.</li> </ul>		Sep 2023-ongoing	
	<ul style="list-style-type: none"> <li>Annual cycle of evaluation to include targets and quantitative/ qualitative data</li> </ul>		Sep 2024-ongoing	
<b>Develop immersion provision for latecomers to</b>	<ul style="list-style-type: none"> <li>Appoint staff to research into existing methodologies and good practice across Wales and to form effective networks</li> </ul>	Outcome 2 working party/LA Officers/ immersion staff/ WG/ Hub schools	Jan 2022	
	<ul style="list-style-type: none"> <li>Identify 'hub' schools in the north and south of the LA. Develop and refurbish hubs from WG immersion funding grant</li> </ul>		Jan 2022	

<b>the Welsh language</b>	<ul style="list-style-type: none"> <li>Open the north 16 place provision hub in YGG Pontardawe – to include promotion, transport arrangements, further staff appointments, open days etc.</li> </ul>		Sep 2022	
	<ul style="list-style-type: none"> <li>Open the south 16 place provision hub in YGG Rhosafan – to include promotion, transport arrangements, further staff appointments, open days etc.</li> </ul>		April 2023	
	<ul style="list-style-type: none"> <li>Working group and LA officers to consider the future of an immersion provision post March 2025 (end of WG 3 year funding) i.e. funding, transport and to include provision in long term LA financial plans</li> </ul>		Sep 2023- March 2025	
	<ul style="list-style-type: none"> <li>Annual cycle of evaluation to include targets and quantitative/ qualitative data</li> </ul>		Sep 2022- ongoing	

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Numbers and % of 5-year olds receiving their education through the medium of Welsh

2022 - 2023		2023 - 2024		2024 - 2025		2025 - 2026		2026 - 2027	
288	19.7%	308	21%	327	22.3%	346	23.6%	365	24.9%

### 3. More children continue to improve their Welsh language skills when transferring from one stage of their statutory education to another

<b>Data collection and information gathering</b>	<ul style="list-style-type: none"> <li>Monitor the transition rates, analyse past and projected transition data, identify gaps/ weaknesses</li> </ul>	Outcome 3 Working party / LA officers/PENTAN/ YGYBD Cluster Group	Sep 2023	
	<ul style="list-style-type: none"> <li>Gather information and identify parents' concerns during transfer.</li> </ul>		Sep 2023- ongoing	
	<ul style="list-style-type: none"> <li>Draft appropriate action plans/ transition plan to address and create demand in specific areas and within specific groups</li> </ul>		Jan 2024- ongoing	



	<ul style="list-style-type: none"> <li>Annual cycle of evaluation to include targets and quantitative/ qualitative data</li> </ul>		Sep 2024-ongoing	
<b>Welsh language continuum policy</b>	<ul style="list-style-type: none"> <li>Create a policy setting out the Local Authority's expectations of pupils continuing within the Welsh sector</li> </ul>	Outcome 3 Working party / LA officers/PENTAN/ YGYBD Cluster Group	Sep 2024	
	<ul style="list-style-type: none"> <li>Ensure that all schools support and implement the policy when dealing with parents, resulting in a collective responsibility to support parents and encourage confidence.</li> </ul>		Jan 2025	
<b>Curriculum Developments</b>	<ul style="list-style-type: none"> <li>Develop a support package with Local Authority level support for schools to develop the visibility of the new curriculum with the focus on confidence in the Welsh language in both WM and EM schools</li> </ul>	Outcome 3 Working party / LA officers	Sep 2023	
<b>Plan for expansion in secondary WM provision</b>	<ul style="list-style-type: none"> <li>Consider expanding the capacity within Welsh-medium secondary education as a result of increased numbers in outcomes 1 and 2 (planning stage in first 5 years-to be implemented in second half of the WESP cycle)</li> </ul>	Outcome 3 Working party / LA officers/ YGYBD	Sep 2024-2027	
	<ul style="list-style-type: none"> <li>Work closely with Replacement Local Development Planning (RLDP) officers and Headteacher in order to identify options and timetables to implement the developments</li> </ul>	SMT/ RLDP officers	Sep 2024-2027	
<b>4 More learners study for assessed qualifications in Welsh (as a subject) and subjects through the medium of Welsh</b>				
<b>Data collection and information gathering</b>	<ul style="list-style-type: none"> <li>Monitor post 16 welsh medium uptake past and projected, analyse data</li> </ul>	Outcome 4 Working party / LA officers/YGYBD/ involved schools/ Colegau Cymru	Sep 2024	
	<ul style="list-style-type: none"> <li>Draft appropriate action plans/ transition plan to address and create demand in specific areas and within specific groups e.g. Early Years workforce</li> </ul>		Jan 2025	
<b>WM Vocational Courses</b>	<ul style="list-style-type: none"> <li>Initial discussions with Colegau Cymru (Neath / Afan College), create baseline of available WM courses and analyse data of current uptake</li> </ul>	Outcome 4 Working party / LA officers/YGYBD/ Colegau Cymru/ WG/ Careers Wales	Jan 2024	
	<ul style="list-style-type: none"> <li>Work with Colegau Cymru and WG to understand available provision and workforce need in order to promote WM vocational courses</li> </ul>		Jan 2024-August 2024	
	<ul style="list-style-type: none"> <li>Draft appropriate action plans/ transition plan to address and create demand in specific areas and within specific groups</li> </ul>		Sep 2024	
	<ul style="list-style-type: none"> <li>Work with Careers Wales and Colegau Cymru to develop a menu of Welsh medium and bilingual apprenticeships for the current pupils in the system,</li> </ul>		Sep 2024-2027	

	Careers Wales to promote Welsh language as essential skills for the future within the Local Authority			
<b>WM Science GCSE/ A Level</b>	<ul style="list-style-type: none"> <li>Transition the default language for Science GCSE in Ysgol Gymraeg Ystalyfera Bro Dur to Welsh.</li> </ul>	Outcome 4 Working party / LA officers/YGYBD	Sep 2025	
	<ul style="list-style-type: none"> <li>Transition the default language for Science A level in Ysgol Gymraeg Ystalyfera Bro Dur to Welsh.</li> </ul>		Sep 2027	
<b>5. More opportunities for learners to use Welsh in different contexts in school</b>				
<b>Siarter iaith/ Cymraeg Campus</b>	<ul style="list-style-type: none"> <li>Re-launch the Siarter iaith/ Cymraeg Campus ensuring that it is embedded in all new curriculum designs</li> </ul>	Outcome 5 Working party /LA officers/ school communities	Sep 2023	
	<ul style="list-style-type: none"> <li>WM and EM schools to reviewed and revisit previous Siarter iaith/ Cymraeg Campus targets and will achieve the pre Covid standards.</li> </ul>		Sep 2023- Sep 2025	
	<ul style="list-style-type: none"> <li>Siarter iaith/ Cymraeg Campus action plans/strategies will be used to ensure regular opportunities for learners, staff and the wider community to engage in activities that increase confidence in the Welsh language and promote Welsh modern culture and history</li> </ul>		Sep 2024- ongoing	
<b>Gig Gymraeg</b>	<ul style="list-style-type: none"> <li>Continue to build on the huge success of our annual 'Gig Gymraeg' within the YGYBD cluster for Y6 and Y7 learners</li> </ul>	Outcome 5 Working party /LA officers/Menter iaith/ PENTAN/ Clwstwr YGYBD/EM schools	Sep 2022- ongoing	
	<ul style="list-style-type: none"> <li>Roll out the 'gig' ensuring that all Y6 pupils in WM and EM schools have access to a contemporary WM music festival on an annual basis, supported by Menter iaith CNPT.</li> </ul>		June 2024	
<b>EM Lead school for curriculum design</b>	<ul style="list-style-type: none"> <li>Identify a leading excellent practice English medium school within the LA</li> </ul>	Outcome 5 Working party /LA officers/ EM schools	Sep 2022	
	<ul style="list-style-type: none"> <li>This school will share resources and ideas and support other schools with their curriculum design, ensuring that Welsh culture, history and appreciation of the local area is embedded in their new curriculum</li> </ul>		Sep 2023	
<b>Cynefin</b>	<ul style="list-style-type: none"> <li>The NPT schools website 'Cynefin', created by learners, to promote modern Welsh culture, history and local area will be launched</li> </ul>	Outcome 5 Working party /LA officers/ WM and EM schools	Sep 2022- ongoing	
	<ul style="list-style-type: none"> <li>'Cynefin' website to added to on a regular basis in all Welsh medium schools</li> </ul>		Sep 2022- ongoing	
	<ul style="list-style-type: none"> <li>'Cynefin' website to be rolled out to all English medium schools</li> </ul>		Sep 2022- ongoing	

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<b>LA provision and third sector services</b>	<ul style="list-style-type: none"> <li>Undertake an audit to see what WM provision is available within the LA (both within school and in the community) and geographical gaps will be identified and filled i.e. provision from Urdd, PASS, Youth Service etc.</li> </ul>	Outcome 5 Working party /LA officers/ Academi Hywel Teifi/ Tŷ'r Gwrhyd/ Menter Iaith/ Urdd/ PASS/ Youth Service/ school communities/other third sector services	Sep 2023-ongoing	
	<ul style="list-style-type: none"> <li>Create a menu of support for WM and EM schools within the LA</li> </ul>		Sep 2024-ongoing	
	<ul style="list-style-type: none"> <li>Third sector services will introduced a baseline and targets that will demonstrate their intention to increase community activities</li> </ul>		Sep 2025	
	<ul style="list-style-type: none"> <li>All schools encouraged to use the Urdd Residential Centres to promote the Welsh language in a fun and relaxed environment</li> </ul>		Sep 2023-ongoing	
	<ul style="list-style-type: none"> <li>WM and EM schools encouraged to partake in Urdd Eisteddfod activities with the aim of increasing confidence in the language and increasing awareness of Welsh literature, music and the arts</li> </ul>		Sep 2023-ongoing	
<b>Provision and promotion of Learning opportunities for non-Welsh speaking learners</b>	<ul style="list-style-type: none"> <li>Undertake an audit of learning opportunities for non-Welsh speaking learners, parents / carers and grandparents or those who are hesitant in the language</li> </ul>	Outcome 5 Working party /LA officers/ Academi Hywel Teifi/ Tŷ'r Gwrhyd/ Menter Iaith/ Urdd/ RhAG	Sep 2023-ongoing	
	<ul style="list-style-type: none"> <li>Develop a programme to ensure provision and promotion of learning opportunities for non-Welsh speaking learners, parents / carers and grandparents or those who are hesitant in the language in order to raise their confidence and assist with their children's education</li> </ul>		Jan 2024-ongoing	

**6. An increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN) (in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018**

<b>Data collection and information gathering</b>	<ul style="list-style-type: none"> <li>Collect detailed data and information to set a baseline for current provision, recognise gaps in provision</li> </ul>	Outcome 6 Working party /LA officers/ WM schools/ ALNCo	April 2023	
	<ul style="list-style-type: none"> <li>Set quantitative targets and time lines for improvement</li> </ul>		Sep 2023-ongoing	
	<ul style="list-style-type: none"> <li>Undertake a biannual audit of the additional learning needs (ALN) of Welsh medium language learners and review our specialist planned places, in order to inform current and map future emerging need for Welsh medium provision for our most complex children and young people with ALN</li> </ul>		Sep 2024-ongoing	

<b>Information and advice</b>	<ul style="list-style-type: none"> <li>Provide information and advice for children and young people and their families</li> </ul>	Outcome 6 Working party /LA officers/ WM schools/ ALNCo	Sep 2023-ongoing	
	<ul style="list-style-type: none"> <li>School and council websites include information about addressing the needs of pupils in Welsh-medium education and about specialist provision</li> </ul>		Sep 2023-ongoing	
<b>DACC (Datblygu Addysg Cynhwysfawr Cymraeg)</b>	<ul style="list-style-type: none"> <li>Set up DACC working group consisting of ALNCO s, LA ALN officers, Headteachers, other LA officers</li> </ul>	Outcome 6 Working party /LA officers/ WM schools/ ALNCo s	Sep 2022	
	<ul style="list-style-type: none"> <li>Hold half termly meetings to discuss and address needs/ pressures on WM ALN, professional development needs and set targets and time lines for improvement</li> </ul>		Sep 2022-ongoing	
<b>WM Provision</b>	<ul style="list-style-type: none"> <li>Develop plans to establish a Welsh-medium learning support centre at YGG Trebannws</li> </ul>	Outcome 6 Working party /LA officers/ WM schools	Sep 2022-ongoing	
	<ul style="list-style-type: none"> <li>Develop plans to establish a Welsh-medium learning support centre at YGG Rhosafan (in line with Sustainable Schools Challenge/ Sustainable Communities for Learning programme)</li> </ul>		Sep 2022-ongoing	
<b>Page 348</b>	<ul style="list-style-type: none"> <li>Discussions to develop bilingual specialist playgroup and childcare provision to support the early identification of emerging needs for our youngest children</li> </ul>	Outcome 6 Working party /LA officers/Early Years officers	Sep 2022-ongoing	

## 7. Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh

<b>Data collection and information gathering</b>	<ul style="list-style-type: none"> <li>Complete a biannual audit and detailed analysis of Welsh speakers able to teach through the medium of Welsh in all sectors including include teachers, TA's, youth workers etc.</li> </ul>	Outcome 7 Working party /LA officers	Sep 2023-ongoing	
	<ul style="list-style-type: none"> <li>Use data to provide workforce planning in order to capture the required number of staff needed for the future and pinpoint schools (WM and EM schools)</li> </ul>		Sep 2023-ongoing	
	<ul style="list-style-type: none"> <li>Set biannual targets for increasing the proportion of the workforce with language skills at foundation level, and at intermediate level or higher</li> </ul>		Sep 2023-ongoing	
	<ul style="list-style-type: none"> <li>Audit the number and place of work of all Welsh speakers within the Authority in order to ensure Welsh medium non-teaching staff are allocated to Welsh medium schools, thus strengthening provision and communication</li> </ul>		Sep 2023-ongoing	

<b>National Sabbatical Scheme</b>	<ul style="list-style-type: none"> <li>• Devise a system of targeting schools according to greater need to nominate individuals to attend the National Sabbatical Scheme</li> </ul>	Outcome 7 Working party /LA officers/ WG/ EM schools	Sep 2023	
	<ul style="list-style-type: none"> <li>• Implement a system of targeting schools according to greater need to nominate individuals to attend the National Sabbatical Scheme with a view to enabling 3 teachers per year to attend</li> </ul>		Sep 2024	
	<ul style="list-style-type: none"> <li>• Monitor and ensure that the learning and knowledge is cascaded within each school that benefits from the scheme with a view to creating a changed culture, ethos and language practice within the school</li> </ul>		Sep 2025	
<b>Workforce forum</b>	<ul style="list-style-type: none"> <li>• Establish a workforce forum to respond to recruitment gaps and challenges in the authority</li> </ul>	Outcome 7 Working party /LA officers /	Sep 2023	
<b>Staff recruitment</b>	<ul style="list-style-type: none"> <li>• Create clear guidelines for use by schools, governing bodies and HR when recruiting new staff, outlining the expectation in terms of the Welsh language</li> </ul>	Outcome 7 Working party /LA officers	Sep 2024	
	<ul style="list-style-type: none"> <li>• School Governing Bodies will be required to address this ongoing aim as a standing agenda item</li> </ul>		Jan 2025	
<b>Partnerships and promotion</b>	<ul style="list-style-type: none"> <li>• Build on the effective ITE partnership between YGYBD and Swansea University and ensure maximum engagement with the new Primary programme.</li> </ul>	Outcome 7 Working party /LA officers/ ITE providers/ YGYBD/ Swansea University/ Careers Service	Sep 2022-ongoing	
	<ul style="list-style-type: none"> <li>• PGCE students from Swansea University and the Careers Service will hold regular information sessions with staff and pupils from Y10-13 in both Welsh and English medium schools, outlining the benefits of a career in education and the integral role the Welsh language plays in this</li> </ul>		Sep 2023-ongoing	
<b>Academi Hywel Teifi- Welsh Language courses</b>	<ul style="list-style-type: none"> <li>• Develop initial five-year programme of planning and development for teaching staff within the Local Authority to attend Welsh language courses run by Academi Hywel Teifi with focus on staff in English-medium schools with minimal Welsh-language skills, but provision for those wishing to brush up or enhance their skills will also be made available across all schools</li> </ul>	Outcome 7 Working party /LA officers/Academi Hywel Teifi	Sep 2023-2027	
<b>Welsh Government Workforce</b>	<ul style="list-style-type: none"> <li>• Review the Welsh Government Workforce Development Plan</li> </ul>	Outcome 7 Working party /LA officers/ WG/ partners	Sep 2023	

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<b>Development Plan</b>	<ul style="list-style-type: none"><li>• Seek to mainstream recommendations at local level to maximize and grow a Welsh teaching and learning workforce using a partnership approach to planning the workforce needs</li></ul>		Jan 2024	
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# WELSH IN EDUCATION STRATEGIC PLAN

**Name of Local Authority**

**Neath Port Talbot**

**Period of this Plan**

**2022-2032**

**This Welsh in Education Strategic Plan is made under Section 84 of *The School Standards and Organisation (Wales) Act 2013* and the content complies with the *Welsh in Education Strategic Plans (Wales) Regulations 2019*<sup>1-2</sup>. We have given due regard to the statutory guidance issued by Welsh Ministers when setting our targets.**

**Signed:** ..... **Date:** .....

(This Plan needs to be signed by the Chief Education officer within your local authority)

<sup>1</sup> [The Welsh in Education Strategic Plans \(Wales\) Regulations 2019](#)

<sup>2</sup> [The Welsh in Education Strategic Plans \(Wales\) \(Amendment\) \(Coronavirus\) Regulations 2020](#)

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## **Foreword**

I am pleased to publish Neath Port Talbot's Welsh in Education Strategic Plan 2022-2032. This exciting Plan sets the direction of strategic planning for the growth of Welsh medium education in the County over the next decade.

This plan reflects our vision for promoting and ensuring meaningful access to Welsh language learning for pupils and staff across all phases and sectors and places the needs of our learners at the heart of our provision. We believe that all children should benefit from the opportunity to learn, appreciate and shape their lives through the medium of Welsh. As a result, we are committed to ensuring high quality provision and support that will enable all learners to benefit from universal access to Welsh-medium education and experiences.

We firmly believe that education is the vehicle that will produce Welsh speakers of the future, and we have a responsibility to stimulate and promote growth in the sector. This is at the heart of this plan, with the aim of ensuring that the Welsh language is not restricted to the classroom.

As an Authority, we are committed to achieving all of the ambitious aims within our Welsh in Education Strategic Plan and will ensure that the Plan responds in a co-ordinated, proactive and ambitious way towards the achievement of the Welsh national targets for 2050 and the aim of having one million Welsh speakers.

Councillor Peter Rees

**Cabinet Member for Education, Skills and Culture**

January 2022

## Our ten year vision for increasing and improving the planning of the provision of Welsh-medium education in our area

### The Vision

Neath Port Talbot Local Authority Borough Council recognises that language and culture are critical parts of an individual's identity and is committed to promoting and ensuring meaningful access to Welsh language learning for pupils across all phases and sectors.

Our vision for improving the planning and thus increasing the provision of Welsh medium education in Neath Port Talbot will facilitate the national vision for the Welsh language, to secure 1 million Welsh speakers by 2050. We share the Welsh Government's vision:

***...to secure favourable circumstances throughout the country that support language acquisition and use of Welsh language skills. We want to see an increase in language transmission in the family, early introduction of Welsh to every child, an education system that provides Welsh language skills for all***

Cymraeg 2050 – A million Welsh speakers (Welsh Government, 2017)

In Neath Port Talbot we will enable all learners, families and carers to develop their Welsh language skills and to use the language confidently in everyday life. Welsh-medium education is an integral and essential part of the learning offer in Neath Port Talbot. We believe that all children should benefit from the opportunity to learn, appreciate and shape their lives through the medium of Welsh. The authority underpins this principle by committing to enabling all learners to benefit from its universal access to this provision.

Our Welsh in Education Strategic Plan (WESP) 2022-32, will be the cornerstone for this vision and will detail how we plan to support and further develop Welsh language education in schools and in the wider communities and how we plan for future growth. The plan details how we will secure further development over the next 10 years, January 2022 - January 2032. It aligns itself to:

- The Well-being of Future Generations (Wales) Act 2015
- 'A Wales of Vibrant Culture and Thriving Welsh Language'
- Prosperity for All: the national strategy and the programme for Government, Taking Wales forward 2016-2021
- Welsh Government's national Welsh language strategy 'Cymraeg 2050: A million Welsh speakers by 2050'
- Education in Wales: Our National Mission, Action Plan 2017-21- A desire for learners to become increasingly bilingual and commitments to

encourage teachers with some ability to speak Welsh to further develop their skills

- The Welsh in Education, Action Plan 2017-21  
Sets the direction for the development of Welsh-medium education
- Neath Port Talbot Welsh Language Promotion Strategy

Our statutory education system has a vital role to play in increasing the number of Welsh speakers and, as highlighted by Welsh Government's Cymraeg 2050 Strategy, "post-compulsory education and training providers have a key role to play in sustaining learners' Welsh language skills to meet the growing need for a bilingual workforce". In order to achieve our goals, we must significantly increase the number of school learners who have the opportunity to develop Welsh-language skills in all settings and thus use it in their everyday lives.

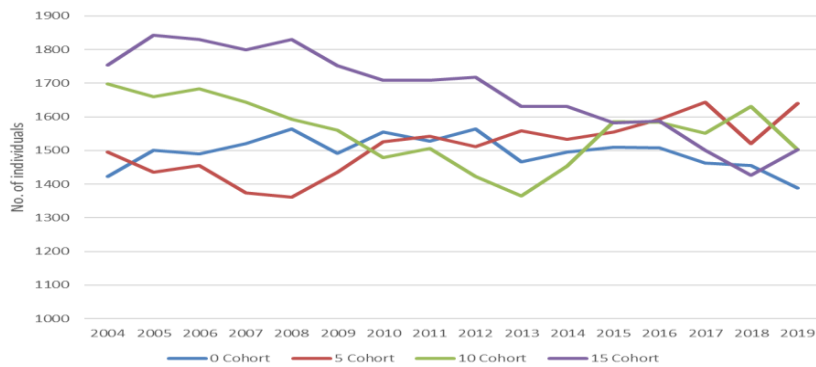
Welsh Government have set a target for Neath Port Talbot to increase the number of learners accessing Welsh-medium education of between 17% and 27% over a 10 year period. This target is based on increasing the number of Year 1 children taught through the medium of Welsh from 16.8% (252 pupils) in 2020/21 (PLASC 2021) to 31% (460 pupils) by 2032. Our ambitious plan is to exceed the upper range of the target set by Welsh Government.

### **Current trends and projected forecasts**

The overarching 10 year target is set as a result of a geographic and demographic assessment. The analysis tells us:

- The number of children within the zero age cohort gradually increased in the early 2000s but this process has now flattened out and returned to the lower levels previously seen at the beginning of the period.
- The three year average number of individuals within this cohort in 2017-19 is 1,436, which is 5.9% down on the level seen a decade earlier when the three year average for 2007-09 was 1,526 (90 individual per year higher).
- The age five cohort has displayed considerable growth over the last decade with the three year average 15.2% higher for this age group during 2017-19 than compared to 2007-09 (up from 1390 to 1601). This is in contrast with older age cohorts with the number of 15 year olds present within the County Borough seeing a sustained fall over the last 15 years, with the number in this age group now 17.7% lower than a decade earlier.

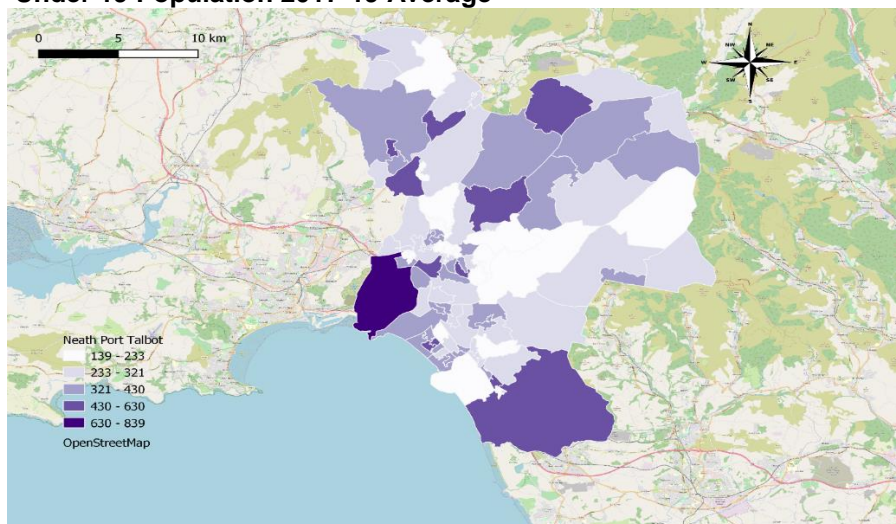
### County level population chart



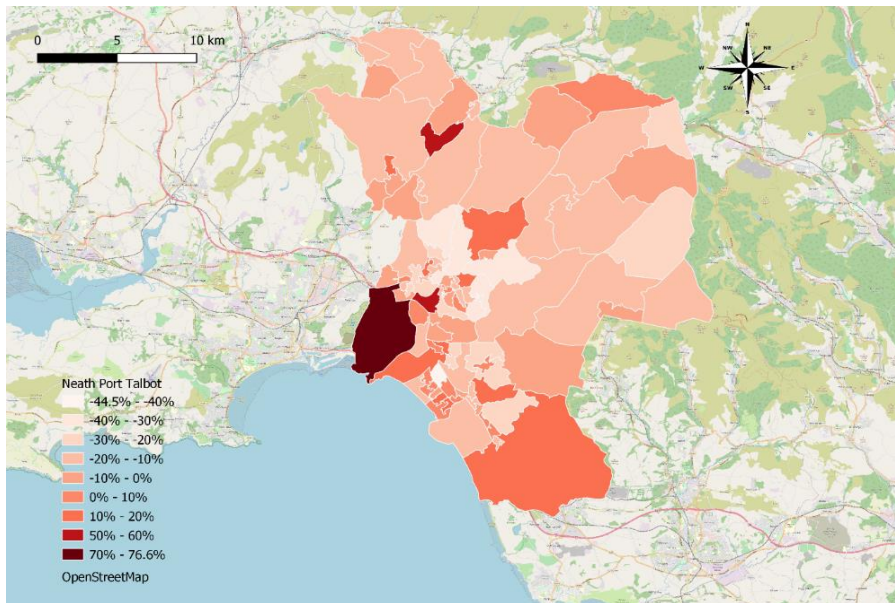
The above data shows a decrease in zero age population, however, an analysis of factors which will impact on the future of Welsh medium education has showed a projected plateauing in the school age population and a potential to substantially increase the number of Welsh medium learners within the next 10 years. The factors taken into consideration when conducting the assessment included population change, population density, population composition, existing Welsh language skills, current Welsh-medium learners and potential additional demand for Welsh-medium education.

The data from the assessment shows that some areas within the Local Authority are showing significant population growth in the under 19 category with one showing a population increase of 76.6% from a three year average of 475 in 2002-04 to 839 in 2017-19. The three year average for this area of 839 makes this the largest in terms of absolute population for this age group.

### Under 19 Population 2017-19 Average



### Under 19 % Population Change 2002-4 Average to 2017-19 Average



Analysis of the data shows that the strategic plan will require a proactive and reactive approach to include:

- establishing new Welsh-medium schools in areas where the demand for Welsh-medium education is identified
- creating a demand for Welsh-medium education in new geographical areas

### **Strategic Planning and links with the Local Development Plan**

A termly meeting is held to share information and consider future pressures on school places, including those brought about by approved housing developments, and to develop the appropriate responses to these pressures. Information on approved housing developments and information on sites allocated within the Local Development Plan (LDP) will be considered along with pupil population forecasts to predict the likely impact of population changes at a local and authority-wide level. Due consideration will be given to the demand for Welsh-medium education, and its planned growth. Work has recently begun on the preparation of the new LDP (2021-2036). Through consultation and engagement with key stakeholders throughout the plan's preparation process, the new plan will consider whether site-specific education facility allocations will need to be made and what policies may be needed to secure education provision, for example, through planning obligations. The new LDP will consider the demand for educational land use for all ages, types of facilities and for Welsh-medium and English-medium provision. The WESP co-ordinator along with the Strategic School Improvement programme team have been included in developing the new LDP.

## **Achieving the Vision**

In order to deliver the WESP our main objectives are:

- to bring forward a proposal to create a further 3 Welsh medium primary schools within the ten year plan
- to increase the transfer rates between pre-school and Welsh-medium school-based provision by 80% during the lifetime of the plan: we will deliver an action plan in conjunction with providers such as Mudiad Meithrin
- to ensure increased transition rates from Welsh-medium primary schools to Welsh-medium secondary schools with the aim of securing 100% transition rate per year
- to establish later entry point linguistic support for pupils wishing access to Welsh Medium Education through latecomer immersion provision for both primary and secondary learners as outlined in Outcome 2
- to ensure that Welsh language provision across all Welsh and English medium settings provides pupils with the skills and ability to become confident and sustained speakers of Welsh
- to ensure that post 16 provision through the medium of Welsh is strengthened and thus meets the needs and aspirations of all students
- to maintain the availability of transport in line with the approved council travel policy in order to promote access to Welsh-medium provision
- to ensure that children and young people with ALN receive linguistic equality of opportunity in terms of Welsh-medium education and support in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018.
- to ensure that access, locally or regionally, to professional training to support the development of effective Welsh teaching and learning which responds to the identified needs of those working in both the English and Welsh-medium sectors
- to recognise Welsh as being essential in role specifications when recruiting all school-based staff; we will clearly outline our expectations in terms of skill-level requirement (from Level 0 to 3) and provide in-house training to support staff development
- to ensure that the WESP Forum has clear objectives to enable it to deliver the outcomes effectively

These main objectives are discussed in detail on the following pages, with a brief summary of the current position and our proposals for the duration of the WESP.

## **Current provision**

Access to Welsh-medium education is met through existing primary and secondary school provision, mainly within the local authority and in a small number of cases in neighbouring authorities. We also facilitate access to secondary phase Welsh-medium education for out of Local Authority pupils, mainly from Powys, at Ysgol Gymraeg Ystalyfera Bro Dur. Recognising parental demand for more readily accessible secondary phase Welsh medium education, the local authority has recently established a second 11-16 campus in the south of the Local Authority

Borough. Transport has been provided in accordance with the authority's Home to School Travel Policy 2017.

The Local Authority complies with the statutory duties of the Learner Travel Measure (Wales) 2008 and currently the Council's policy is to provide discretionary free home to school travel assistance to those pupils attending their nearest suitable Welsh-medium education provision or the designated Welsh-medium education provision for the home address. Discretionary assistance for free home to school travel to Welsh-medium schools is subject to the specified distance criteria being met. Currently there is no requirement to provide free home to school travel assistance to pupils of non-compulsory school age, including those attending Welsh-medium Post-16 provision.

### **Swansea Valley – an area of linguistic sensitivity**

The term 'linguistic sensitivity' is used to define those areas in Wales which require targeted and additional support where the language is deemed to be in a weakened state and where the number of speakers are in serious decline, and where the linguistic community may face challenges around the daily use of their language.

According to the 2011 Census, around 15.3% of the county borough's population could speak Welsh, which equates to 20,698 individuals. The vast majority of these speakers lived in the top of the Swansea and Amman Valleys with some communities such as Gwaun Cae Gurwen, Cwmllynfell and Lower Brynamman amongst the highest percentage of Welsh speaking areas in Wales. However, these are the areas that saw the greatest decline in terms of percentage and numbers of Welsh speakers between 2001 and 2011.

The Neath Port Talbot Welsh Language Promotion strategy highlights the importance of the area between Trebanos to Cwmllynfell and Rhos to Gwaun Cae Gurwen as possibly the *'most important in the county borough in terms of its linguistic significance as it contains the highest numbers and percentages of Welsh speakers.'*

The table below shows a significant drop in the number of Welsh speakers in these communities over 10 years. In 2011 the Welsh Language Board established a specific language promotion scheme for the Aman Tawe area in an effort to halt the decline of the Welsh language in this area.

Community	Number of Welsh speakers (2001)	Number of Welsh speakers (2011)	Change	% Comparable change
Cwmllynfell	741	669	-72	-9.72
Lower Brynamman	861	776	-85	-9.87
Gwaun Cae Gurwen	1,860	1,572	-288	-15.48
Ystalyfera	1,614	1,339	-275	-17.04
Trebanos	580	459	-121	-20.86
Godre'r Graig	580	473	-107	-18.45
Pontardawe	1,826	1,624	-202	-11.06
Alltwen	800	664	-136	-17.0
Rhos	692	588	-104	-15.03

2001 and 2011 census

Factors that contribute to linguistic erosion include:

- Lack of language transmission at home
- Out-migration / Immigration
- Negative perception of the inherent value of the language
- Lack of awareness of the advantages of bilingualism
- Lack of confidence in Welsh speakers
- The spread of English into traditional Welsh languages
- Mixed language marriages
- The power of Anglo-American influence on the interests of children and young people
- More deaths than births among Welsh-speaking families

A range of actions have been identified within this WESP which are aimed to support and develop the Welsh language within this area and other areas within the Local Authority which require additional support to ensure that numbers do not significantly decline further.

As not to hold back on realising the ambitious targets in this strategic plan, the current WESP does not include actions with regards to the Swansea Valley proposal. We commit to working close with Welsh Government to address the actions and consider the advice in the Impact Assessment. This further work will be annexed to the current WESP once a decision process has been completed.

### **Welsh-medium Childcare Provision within Neath Port Talbot**

Name of provision	Location
Cylch Mwy Blaendulais	Seven Sisters
Tiddlywinks Childcare Centre	Ystalyfera
Cylch Aberafan	Aberavon
Cylch Brynhyfryd	Brynhyfryd
Lots of Tots	Tairgwaith
Meithrinfa Ddydd Ser Bach	Neath



Cylch Chwarae Castell-nedd	Neath
Meithrinfa Ddydd y Waun	Gwaun-Cae-Gurwen
Georgie Porgie's Cylch Tir Morfa	Sandfields
Cylch Chwarae Pontardawe	Pontardawe
Cylch Meithrin Cwmnedd	Glynneath

### **Welsh-medium schools within Neath Port Talbot**

Primary	Middle (3-19)
Ysgol Gynradd Gymraeg Blaendulais	Ysgol Gymraeg Ystalyfera Bro Dur
Ysgol Gynradd Gymraeg Castell-nedd	
Ysgol Gynradd Gymraeg Cwmnedd	
Ysgol Gynradd Gymraeg Cwmllynfell	
Ysgol Gynradd Gymraeg Gwaun Cae Gurwen	
Ysgol Gynradd Gymraeg Pontardawe	
Ysgol Gynradd Gymraeg Rhosafan	
Ysgol Gynradd Gymraeg Trebannws	
Ysgol Gynradd Gymraeg Tyle'r Ynn	

### **Post 16 provision within Neath Port Talbot**

Name of Provider
Ysgol Gymraeg Ystalyfera Bro Dur
Coleg Afan Nedd
St Joseph's Sixth Form Centre

## Outcome 1:

### More nursery children/ three year olds receive their education through the medium of Welsh

#### Where are we now?

Our early years ambition for the Welsh Language in Neath Port Talbot, involves us generating a culture where high quality Welsh Language services for families are not just easily accessible and available, but in demand; we need to create that demand. We feel, the key here is promoting and communicating the benefits of the Welsh Language and bilingualism as early as possible during a child's journey through education and services.

We recognise that parents decisions about their child's ultimate destination school, regardless of language, is often considered very early on in a child's life, or even during gestation. Identifying both universal and targeted provision contact points with families, and working in partnership is essential in fulfilling these targets.

In terms of our existing strategies and plans, it is essential for us to dovetail the many cross-cutting outcomes throughout the Early Years services we run, both as a Local Authority, and collaboratively with partners. These include:

- CCG: Childcare and Play- Supporting Families (3 focus areas, one of which is to support and assist families wishing to access provision through the medium of Welsh)
- Welsh Language Strategy – Childcare element within Priority 1
- Childcare Sufficiency Assessment – Priority: Improve access to Welsh medium and bilingual provision
- Play Sufficiency Assessment
- Flying Start Childcare
- Childcare Offer for Wales

#### **Childcare Sufficiency Assessment**

The Childcare Act 2006 requires Neath Port Talbot Council, and other Local Authorities to shape and support the development of childcare in the local area to make it flexible, sustainable and responsive to the needs of the community. This is to ensure that parents, carers and families are able to access the childcare they need locally. Local Authorities are therefore required to assess the local childcare market to develop a realistic and robust picture of parents' current and future need for childcare. Having sufficient childcare in Neath Port Talbot means that families are able to find childcare that meets their children's needs and empowers parents and carers to make choices about work and training.

The Childcare Sufficiency Assessment data was not required by WG to be refreshed as initially planned during 2020, due to the pandemic. The last full CSA was 2017. This was reliant on SASS data that was not fully complete by the NPT CC sector at the time, so the data and information is not an accurate measure of the WM sector at the time.

3% of the 68 registered childminders in NPT class their main operating language as Welsh and English (2 childminders classified as Welsh/English, 66 class themselves as English only).

The new Childcare Sufficiency Assessment will be published in 2022 and this information will be included in the annual action plans that will accompany this WESP.

### **Distribution of Childcare Places**

Based on data from June 2020, there were 9 wards within the Local Authority with no registered childcare provision (Welsh and English). Of these 9 wards, 3 were in the catchment area of existing Welsh-medium schools- Trebanos, Godre'r Graig and Coedffranc Central. It is therefore essential to address these areas within the first half of the WESP plan, with the aim of addressing the remaining areas in the second half of the plan.

### **Welsh-medium Childcare Data**

From a snap shot taken 30<sup>th</sup> August 2021 from the NPT CIW childcare data shown below, 10.5% of the total 2199 available registered childcare spaces were Welsh Medium spaces:

Service URN	Service Name	Provider Address Town/City	Service Type	Service Sub Type	Maximum Capacity	Date Of Registration	Temporarily Closed
SIN-00004620	Cylch Meithrin Mwy Blaendulais	Blaendulais	Childrens Day Care	Sessional Day Care	12	37347	Open
SIN-00004621	Tiddlywinks Childcare Centre, Yst	Ystalyfera	Childrens Day Care	Full Day Care	43	37347	Open
SIN-00005342	Cylch Aberafan, Aberavon Integrated Children's Centre	Aberavon	Childrens Day Care	Sessional Day Care	12	38951	Open
SIN-00005645	Cylch Brynhyfryd Flying Start Playgroup	Brynhyfryd	Childrens Day Care	Full Day Care	?	40206	Open
SIN-00005723	Lots of Tots (Canolfan Maerdy)	Tairgwaith	Childrens Day Care	Full Day Care	52	39926	Open
SIN-00005753	Meithrinfa Ddydd Ser Bach / Little Stars Day Nursery	Neath	Childrens Day Care	Full Day Care	19	39917	Open
SIN-00006233	Cylch Chwarae Castell-Nedd	Neath	Childrens Day Care	Sessional Day Care	28	41346	Open
SIN-00006241	Meithrinfa Ddydd y Waun	GCG	Childrens Day Care	Full Day Care	19	41380	Open
SIN-00006588	Georgie Porgie's Cylch Tir Morfa	Sandfields	Childrens Day Care	Full Day Care	12	42009	Open
SIN-00007321	Cylch Chwarae Pontardawe	Pontardawe	Childrens Day Care	Full Day Care	14	42571	Open
SIN-00008668-SPWH	Cylch Meithrin Cwmnedd	Cwmnedd	Childrens Day Care	Full Day Care	20	43325	Open
				<b>Total Spaces</b>	<b>231</b>		
Service URN	Service Name	Provider Address Town/City	Service Type	Service Sub Type	Maximum Capacity	Date Of Registration	Temporarily Closed
SIN-00010201-SWQB	Clwb Plant Tiddlywinks, Yst	Ystalyfera	Childrens Day Care	Out of School Care	32	43517	Closed

In the short term, one 32 place WM setting is closed and is being supported to reopen, along with our current SSIP (Strategic School Improvement)/ WMG (Welsh Medium Grant)/ CCO (Child Care Offer) capital developments due to be completed, creating an additional 58 Welsh Medium spaces to be available before 2022. This increases the overall WM percentage to 14.6% by 2021/2022.

### **Flying Start**

The number of children accessing Welsh language in Flying Start, accumulative, is as follows:

2017/18 - 104

2018/19 – 135

2019/20 -130

## 2020-21(during Covid) – 77

There will potentially be 34 more places available as part of the WM capital developments in YGG Pontardawe and YGG Tyle'r Ynn in 2021-2022.

Based on 2020/21 data, there were 452 Flying Start childcare places per annum across our settings of which 65 were category 3 (Welsh language) and category 2 (English/Welsh language) childcare settings equating to a total of 14.4%. The following table shows the transition rate from WM Flying Start places to Nursery education in WM primary schools:

Flying Start Setting	Transition rate		Destination Schools	Notes
	Welsh Medium Nursery	English Medium Nursery		
<b>Cylch Brynhyfryd</b>	66.6%	33.3%	YGG Tyle'r Ynn, Carreg Hir	
<b>Cylch Aberafan</b>		100%	Sandfields Primary	Setting on school site
<b>Cylch Cwmnedd</b>	50%	50%	YGG Cwmnedd, Blaendulais, Cwmnedd English	Setting on YGG school site
<b>Cylch Castell Nedd</b>	50%	50%	YGG CN, Gnoll, Alderman Davies	
<b>Meithrinfa Dydd Y Waun (GCG)</b>	100%		YGG GCG	Setting on school site
<b>Cylch Pontardawe</b>	100%		YGG Pontardawe	Setting on school site
<b>Cylch Tir Morfa</b>	100%		YGG Rhosafan	Setting immediately next to school site
<b>Tiddlywinks Ystalyfera</b>	100%		YGG Ystalyfera Bro Dur	
Lots of Tots Canolfan Maerdy	100%		YGG Ystalyfera Bro Dur, YGG Brynamman	

We recognise the need to increase the percentage of children accessing WM FS childcare entering WM Nursery Education. The current overall transition rate from WM FS Childcare to MW Nursery Education is 74%. 44 children (11 of which accessed English Medium FS Childcare) transitioned into WM Nursery during 2020/2021.

### **Flying Start Expansion- Phase One**

Building on on-going works, in line with our WESP aims, at least 4 additional Welsh or bilingual settings are due to open near to, or in FS areas during 2022/23. These new settings will be used to offer and encourage Welsh language childcare to FS families. While we are committed to the increase and development of Welsh language childcare provision, we also recognise that childcare providers are enthusiastic about offering more Welsh language opportunities in their setting. We have staff that are passionate about the Welsh Language, working with the English Medium settings to improve the Welsh they offer through an awards based Welsh Language quality assurance scheme which includes support, access to training and drop-in Welsh language acquisition sessions. The change in categories will mean a move from category 1 English language settings to category 2 English / Welsh language settings over time.

Additional care will be taken when placing outreach placements, with amendments to outreach policies to include ensuring Bilingual/Welsh childcare is offered, along with benefits of bilingualism messages.

Outreach guidance is being reviewed to assist targeted support via the referral route for families in some key deprived communities that will not be covered by expansion in phase one, as “communities of interest”, so that those who need the support, are still able to

access the services they need, while those communities wait for expansion to reach their areas. We are confident that the 32 additional spaces will be utilised, with scope to use existing FS childcare settings to accommodate this. We hope this offer will have an initial offer of Welsh language provision as a first offer.

Additional Welsh speaking staff are being recruited into the FS parenting team, and our Welsh Language Dev Officer has development a Welsh Award for Childcare settings to promote and improve the use of Welsh within settings

Once the Flying Start Phase One draft plan has been approved by NPTCBC AND SBUHB, quantitative targets will be set in the annual action plan for outcome 1.

### **Developing bilingual settings**

While we are committed to the increase and development of Welsh language childcare provision, we also recognise that childcare providers are enthusiastic about offering more Welsh language opportunities in their setting. We have staff that a passionate about the Welsh Language, working with the English Medium settings to improve the Welsh they offer through and awards based Welsh Language quality assurance scheme which includes support, access to training and drop-in Welsh language acquisition sessions. The change in categories may mean over time a move from category 1 English language settings to category 2 English / Welsh language settings.

### **Capital Projects**

There are a number of pre-school capital projects that will impact Welsh Medium Provision within the Local Authority outlined below which will significantly increase the WM places available:

Capital project	Brief outline of works	Estimated completion date	Additional WM Places
YGG Cwmllynfell	Increased classrooms and new childcare room	Sept 2021	24
YGG Tyle'r Ynn	Increased classrooms, new childcare room, new community space	Sept 2021	24
YGG Pontardawe	Increased classrooms, larger childcare space	December 2021	+10
Neath Central	New childcare setting	May 2022	24
			82

### **Family Information Service**

Our Family Information Service is a pivotal part of Early Years information and support for families within NPT. During COVID its importance has been in the spotlight, with even greater reliance on seeking correct and up to date information on line for families.

The Early Years Team, is working closely with FIS, to develop its information for parents looking for WM groups, childcare and schools, and aims to highlight the benefits of bilingualism and the Welsh Language to parents in a fun and interesting way, including online presence, access to Welsh stories and rhymes, signposting to Welsh lessons for

parents etc. Work has already taken place to improve the WM schools landing page, but we acknowledge that there is work to be done to streamline the links between the FIS site and the NPT schools pages to ensure clear, easy to navigate information.

### **Mudiad Meithrin**

As we move out of the restrictions of coronavirus, community groups will reignite, and we will work with Mudiad Meithrin officers to develop Cymraeg i Blant, Ti a Fi, and to offer early Welsh language opportunities for very young children and families. Cymraeg i Blant will aim is to increase the number of nursery age children that are able to speak Welsh. This will be achieved through sharing information and giving advice and support to parents on the benefits of Welsh medium education/childcare, the benefits of being bilingual and the importance of introducing Welsh to children as early as possible. Cymraeg i Blant will therefore contribute towards the Welsh Government’s target of achieving a million Welsh speakers by 2050.

Mudiad Meithrin officers will continue to work with the Early Years team to develop and expand Cylchoedd Meithrin across the borough especially through their Set up And Succeed programme (Cwmllynfell and Tyle’r Ynn). We will continue to encourage all new and existing Cylchoedd to tender to deliver on our early years’ contracts including Flying Start, Early Years Education, Assisted and Supported Places as well as the Childcare Offer.

### **Nursery places**

Pupils within the Local Authority start Nursery education at the age of 3 years old. The percentage choosing Welsh medium education at this stage is gradually increasing. N1 numbers (youngest Nursery cohort) increased in 2021 as a result of PLASC being later than usual due to the pandemic but the percentage fell from previous years. PLASC 2022 will provide more accurate figures for this cohort.

The percentage of pupils in N2 (oldest Nursery cohort) Welsh-medium schools in 2021 was the highest since 2011, with numbers increasing by almost 4% since 2017. Three year N2 cohort averages at all Welsh-medium primary schools in the south of the Local Authority are on the increase, this coincides with the availability of more accessible secondary Welsh-medium education with the opening of the YG Ystalyfera Bro Dur south campus in September 2017.

<b>Plasc Pupil Numbers and Percentages in Welsh Medium Schools</b>															
<b>Year Group</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Nursery 1 - Numbers	94	111	90	89	103	108	87	110	92	81	85	104	109	112	155
Nursery 1 - Percentages	20.5%	21.9%	19.0%	19.2%	20.2%	22.0%	18.0%	20.5%	18.6%	17.7%	18.4%	21.1%	22.7%	23.7%	20.3%
Nursery 2 - Numbers	245	268	304	280	310	306	285	266	272	270	243	256	270	292	290
Nursery 2 - Percentages	18.6%	18.7%	19.8%	18.8%	21.2%	20.2%	18.6%	17.7%	17.3%	18.0%	17.1%	18.0%	18.7%	19.8%	21.0%

		Plasc Actuals - Welsh Medium Year Nursery 2															
No.	School	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	
2213	YGG Y Wern	16	18	22	15	13	32	18	23	23	11	17					
2202	YGG Blaendulais	14	18	17	12	11	13	16	12	17	7	18	10	12	13	16	
2168	YGG Castell-nedd	39	38	48	34	49	58	54	43	46	60	43	48	53	58	59	
2205	YGG Cwm Nedd	25	25	31	28	44	19	27	23	23	15	11	9	9	27	21	
2149	YGG Gwaun Cae Gurwen	13	14	22	19	13	13	23	18	17	26	25	24	26	24	25	
2218	YGG Pontardawe	31	38	37	47	49	59	38	35	36	56	37	50	45	32	47	
2158	YGG Rhosafan	35	48	53	57	56	47	48	42	45	43	41	50	62	56	51	
2231	YGG Tyle'r Ynn	21	27	30	28	35	26	22	33	30	27	31	26	23	45	30	
2125	YGG Cwmgors	10	7	4	6	4	8	7	6	7							
2128	YGG Cwmllynfell	12	10	11	7	9	14	16	14	19	9	9	8	5	8	9	
2198	YGG Rhiwfawr	3	2	7	5	9											
2208	YGG Trebannws	20	16	18	19	14	17	16	17	9	16	11	10	15	10	11	
2139	YGG Y Glyn	6	7	4	3	4											
5501	YG Ystalyfera - Bro Dur													21	20	19	21
	<b>Total - Welsh Medium</b>	<b>245</b>	<b>268</b>	<b>304</b>	<b>280</b>	<b>310</b>	<b>306</b>	<b>285</b>	<b>266</b>	<b>272</b>	<b>270</b>	<b>243</b>	<b>256</b>	<b>270</b>	<b>292</b>	<b>290</b>	
	<b>Total - NPT</b>	<b>1317</b>	<b>1434</b>	<b>1536</b>	<b>1489</b>	<b>1459</b>	<b>1512</b>	<b>1530</b>	<b>1505</b>	<b>1575</b>	<b>1497</b>	<b>1425</b>	<b>1420</b>	<b>1447</b>	<b>1472</b>	<b>1382</b>	
	<b>% - Welsh Medium</b>	<b>18.6%</b>	<b>18.7%</b>	<b>19.8%</b>	<b>18.8%</b>	<b>21.2%</b>	<b>20.2%</b>	<b>18.6%</b>	<b>17.7%</b>	<b>17.3%</b>	<b>18.0%</b>	<b>17.1%</b>	<b>18.0%</b>	<b>18.7%</b>	<b>19.8%</b>	<b>21.0%</b>	

We recognise that we will need to expand our Welsh language registered childcare places, including Flying Start childcare places, with a focus on any further school expansion to enable continuity for families as well as areas where there is currently no Welsh language childcare provision. The expansion of childcare provision will require a focus on capital developments submitted to Welsh Government, as well as workforce development to ensure sufficient staff to run high quality Welsh language childcare. This in turn will lead to an increase in demand for Welsh-medium Nursery places and will lead to an increase of 3 year olds/ nursery children accessing Welsh-medium education.

### Where do we aim to be within the first 5 years of this Plan and how we propose to get there?

Our aim is to increase the number of Nursery children receiving Welsh-medium education in order to reach our target of an increase of 208 pupils by the end of the 10 year plan. This will be achieved by implementing the following actions.

- The Council commits to creating a baseline and an operational plan that identifies further geographical gaps in provision in order to ensure that pre-school provision is available throughout the county by 2024. This will be in line with the 2022 Childcare Sufficiency Assessment and the Early Years Flying Start expansion plan-Phase One.
- Promote partnership work with Midwifery and Health Visitors to assist early messages about the Welsh Language and bilingualism, to be shared though the perinatal and postnatal period. Information booklets providing information on the benefits of bilingualism and addressing common fears will be created and used by the partners from initial perinatal communication with parents.

- Partnership work with Swansea University/ Academi Hywel Teifi will embed the promotion of bilingualism into the midwifery course currently running at the University.
- Revisit the training run by Cefin Campbell with all staff working within EY in NPT, LA and Health (including SALT), childcare sector etc. It is important to regain some of the momentum lost during COVID, revisiting some of the good work that had started to impact how our own team members and our partners used and promoted Welsh and Bilingualism.
- Promote the importance of transferring between Cylchoedd Meithrin and Welsh-medium primary schools. This transfer is essential to ensure that progression from one to the other increases and reaches 100% by the end of the 10 year plan.
- Work with parents and carers to understand what information they need to inform their choices of language provision for education, including resources, web presence, activities etc. will be developed. They will focus on alleviating common worries and barriers. Partnership work with Menter Iaith and RhAG will be essential in the success of this campaign.
- Work with parents to ensure that a clear progression route in Welsh-medium education from childcare through to post-16 is identified for all families.
- The Local Authority will explore the possibility of using a promotional consultant employed specifically to promote the benefits of Welsh-medium education and to produce a promotional campaign i.e. website, leaflets, social media, posters, videos, to strengthen communication. A NPT website will be created outlining the journey of Welsh medium education for learners within the Local Authority. Menter Iaith and RhAG will play a pivotal role in promotion.
- Develop Welsh-medium wraparound childcare options to address gaps in existing provision and to support parents including parents accessing the 30 hour offer and Flying Start expansion in conjunction with our partners including Mudiad Meithrin through establishing new Cylch Meithrin settings for YGG Tyle'r Ynn, YGG Cwmllynfell, YGG Trebannws, YGYBD Primary sector as well as within the 3 new Welsh-medium primary schools which will open within the 10 year plan.
- Develop further Welsh-medium wraparound childcare options to support parents accessing the 30 hour offer and Flying Start expansion in conjunction with our partners including Mudiad Meithrin through expanding existing settings i.e. YGG Pontardawe, YGG Gwaun-Cae-Gurwen.
- Increase the number of Welsh-medium groups running within settings and schools i.e. Babi a Fi, Ti a Fi, baby massage, parenting classes to follow the YGG Tyle'r Ynn model (Ti a Fi alone increased Nursery numbers by 24 places).
- Regularly review the 'Neath Port Talbot Childcare Sufficiency Assessment Action Plan' with an emphasis on improving access to Welsh medium and bilingual provision by identifying and filling gaps in provision.
- Based on 2020/21 data, there were 452 Flying Start childcare places per annum across our settings of which 65 were category 3 Welsh language and category 2 English/Welsh language childcare settings equating to a total of 14.4%. We have a target in Flying Start to increase this percentage to 20% within the next 5 years, 25% by end of the 10 year plan by expanding provisions/ establishing new provisions.
- The Early Years team will continue to work with Mudiad Meithrin officers to develop and expand Cylchoedd Meithrin across the borough especially through their Set up And Succeed programme (Cwmllynfell and Tyle'r Ynn). We will continue to



encourage all new and existing Cylchoedd to tender to deliver on our early years' contracts including Flying Start, Early Years Education, Assisted and Supported Places as well as the Childcare Offer

- The Local Authority will support the Welsh Language Awards within English language childcare settings to progress through the continuum towards an increase in category 2 Welsh language childcare provision.
- Use the PSA (Play Strategy Assessment) to develop and encourage out of school activities in Welsh.
- The Local Authority will review and amend the online admissions process in partnership with the admissions team for the process of applications for Nursery and Reception, so that information is strategically placed throughout the online application system to ensure families are able to make informed decisions about the language of provision they want for their child.
- A programme of professional development will be created to ensure that partners are updated regarding what is available, increase confidence for those who speak Welsh already, provide opportunities to learn Welsh and ensuring Welsh is part of job vacancies moving forward.
- All partners will collaborate and support private childcare settings to ensure an increase in Welsh medium provision with the emphasis of promoting the advantages of bilingualism.
- Ensure sufficient provision for Nursery/ 3 year old provision at primary school level is easily available throughout the Local Authority. We will establish a new single form entry starter school in Skewen/ Neath Abbey area with the possibility of expanding/ transferring to a new purpose built WM primary school in Coed Darcy subject to member approval and compliance with the extant criteria of the Schools' Organisation Code.
- To bring forward a proposal to create a further 2 Welsh medium primary schools within the 10 year plan. Funding will be sought from the appropriate Sustainable Communities for Learning programme grant funding streams. The initial plan for opening the second school in the south east of the Local Authority will be in place by 2024. The location of the third School will be confirmed in the second half of the scheme.

### **Where do we expect to be at the end of our ten year Plan?**

By the end of the 10 year plan, all pupils in all areas of the Local Authority will have easy access to Welsh medium education and Welsh pre-school education. Information regarding Welsh medium education and the benefits of bilingualism will be provided by all partners to parents throughout the educational continuum, from pre-birth to post 18 in order to provide clear, concise and cohesive information. Parents will be supported throughout their child's education.

## Key Data

### Numbers and % of 3-year olds receiving their education through the medium of Welsh

2022 - 2023		2023 - 2024		2024 - 2025		2025 - 2026		2026 - 2027	
311	21.4%	331	22.8%	351	24.2%	370	25.5%	389	26.8%
2027 - 2028		2028- 2029		2029 - 2030		2030 - 2031		2031 - 2032	
408	28.1%	427	29.5%	446	30.8	465	32.%	484	33.4%

## Outcome 2

### More reception class children/ five year olds receive their education through the medium of Welsh

#### Where are we now?

In Neath Port Talbot there are 10 Welsh-medium schools, 9 out of 55 primary schools and 1 Welsh-medium middle school providing for ages 3 -18yrs. There are also 7 English-medium secondary schools and 2 English-medium Special Schools.

Although showing a variation over the years, the numbers at reception age show an increase. Both the number and percentage of reception pupils in Welsh-medium schools increased for the third year in a row with the percentage higher than it has been since 2013.

Plasc Pupil Numbers and Percentages in Welsh Medium Schools															
Year Group	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Reception - Numbers	272	247	263	303	282	296	296	276	265	266	273	234	252	268	283
Reception - Percentages	20.1%	18.4%	18.3%	19.3%	18.5%	20.0%	19.3%	17.9%	17.2%	16.7%	17.8%	16.1%	17.2%	18.0%	18.7%

Plasc Actuals - Welsh Medium Year Reception																
No.	School	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
2213	YGG Y Wern	23	14	18	18	15	13	29	19	22	23	13				
2202	YGG Blaendulais	14	15	20	17	13	13	12	14	12	16	7	18	10	11	15
2168	YGG Castell-nedd	49	40	38	48	37	48	57	49	45	49	61	38	46	52	54
2205	YGG Cwm Nedd	21	24	24	33	27	42	15	24	23	21	15	13	10	9	27
2149	YGG Gwaun Cae Gurwen	22	14	12	23	17	15	14	21	17	22	26	22	23	24	23
2218	YGG Pontardawe	36	34	37	38	49	46	58	41	35	35	55	35	48	46	32
2158	YGG Rhosafan	43	35	47	51	54	57	46	47	41	43	44	40	47	63	54
2231	YGG Tyle'r Ynn	21	22	27	27	31	35	27	20	34	30	28	30	26	25	43
2125	YGG Cwmgors	4	10	8	3	6	5	7	7	6						
2128	YGG Cwmllynfell	10	12	9	13	5	13	15	18	14	19	8	9	10	5	8
2198	YGG Rhiwfawr	9	3	2	8	7										
2208	YGG Trebannws	19	19	15	21	20	9	16	16	16	8	16	11	11	14	10
2139	YGG Y Glyn	1	5	6	3	1										
5501	YG Ystalyfera - Bro Dur												18	21	19	17
	<b>Total - Welsh Medium</b>	<b>272</b>	<b>247</b>	<b>263</b>	<b>303</b>	<b>282</b>	<b>296</b>	<b>296</b>	<b>276</b>	<b>265</b>	<b>266</b>	<b>273</b>	<b>234</b>	<b>252</b>	<b>268</b>	<b>283</b>
	<b>Total - NPT</b>	<b>1355</b>	<b>1341</b>	<b>1437</b>	<b>1572</b>	<b>1521</b>	<b>1479</b>	<b>1533</b>	<b>1542</b>	<b>1543</b>	<b>1596</b>	<b>1532</b>	<b>1457</b>	<b>1461</b>	<b>1487</b>	<b>1511</b>
	<b>% - Welsh Medium</b>	<b>20.1%</b>	<b>18.4%</b>	<b>18.3%</b>	<b>19.3%</b>	<b>18.5%</b>	<b>20.0%</b>	<b>19.3%</b>	<b>17.9%</b>	<b>17.2%</b>	<b>16.7%</b>	<b>17.8%</b>	<b>16.1%</b>	<b>17.2%</b>	<b>18.0%</b>	<b>18.7%</b>

At present, the following is being implemented within the Local Authority:

- We currently monitor demand and identify trends for Welsh-medium education and use this information to plan for future provision.
- We ensure that proposals for appropriate Sustainable Communities for Learning include full consideration of Welsh-medium education.
- Targets are set to increase the capacity of Welsh-medium pre-school provision and to provide information for parents/carers that promotes the benefits of a bilingual education, seeking advice of best practice in other authorities. In terms of Welsh language pre-school provision, a snap shot taken 30<sup>th</sup> August 2021 from the NPT CIW childcare data shows that 10.5% of the total 2199 available registered childcare spaces were Welsh Medium spaces.

- The current SSIP/WMG/CCO capital developments will create an additional 58 Welsh Medium spaces to be available before 2022. This increases the overall WM percentage to 14.6% by 2021/2022.
- We work closely with Mudiad Meithrin to ensure expansion of pre-school provision across the authority and support the sector to recruit suitably skilled Welsh language care workers.
- Targets are set within the NPT Language Promotion Strategy plan to improve the support for parents/pupils and schools to move along the linguistic continuum through collaboration with Menter Iaith and RhAG.
- The authority has opened a second WM secondary campus in the south-east in September 2018 with a capacity for 650 11-16 pupils. It has stimulate interest and growth in WM primary provision in the areas of Port Talbot, Neath, Llandarcy, Briton Ferry and the Cwmafan area in subsequent years.
- All the Council's schools are regularly reviewed against specific criteria, and the need for sufficient places at Welsh-medium schools features in the reviewing process, the outcomes of which have included rationalisation of Welsh-medium schools, where appropriate, to maximise the available accommodation and improve teaching and learning opportunities. The need for Welsh-medium schools is addressed by a strategic approach to service planning and delivery.
- The below projects have recently been completed or are nearing completion. In total these projects will increase the number of Foundation Phase places available within primary schools by 150 F/T pupil places.

The projects are:

1. Ysgol Gynradd Gymraeg Pontardawe,

This project initially involved creating 3 extra classroom and childcare provision at Ysgol Gynradd Gymraeg Pontardawe. This project was awarded £1.6m grant funding.

Following more detailed discussion with the school the scheme was amended. At the schools request the current childcare provision and nursery/reception classes were relocated within the school to allow for work to take place without interruption, which necessitated remodelling 2 classrooms, providing extra toilet facilities and outdoor play area, converting the staffroom and office to provide childcare facilities and converting a reception area for storage.

The completed scheme will provide remodeled and extended childcare and nursery facilities along with 2 new build FP classrooms, a new entrance way, staffroom, meeting room and office and additional play areas, fencing and pathways, along with medium refurbishment of the hall.

As well as providing increased capacity the scheme also sought to relocate the main entrance and reception to the front of the school creating a new and more visible front of school which can be clearly seen by the road and nearby housing estate. With careful landscaping and signage of the school site it is hoped that the school will appear more attractive to parents who may be considering a WM education in their local area.

## 2. Ysgol Gynradd Gymraeg Cwmllynfell

At Ysgol Gynradd Gymraeg Cwmllynfell £640k was awarded to provide 1 extra classroom space and a childcare setting, with the aim of increasing the capacity of the school, improve Foundation Phase provision and provide space to develop pre-school Welsh-medium provision.

The scheme aimed to prevent drift to other schools in neighbouring authorities, strengthening the development of Welsh language in the area and impacting positively on the Council's Band B proposal at YG Ystalyfera Bro Dur (north campus) by increasing the number of children from the area choosing secondary education through the medium of Welsh.

The project has been successfully completed and both the new classroom and childcare provision are ready for use.

## 3. Ysgol Gynradd Gymraeg Tyle'r Ynn

The aim of this project was to create a more attractive and stimulating learning environment with high quality Welsh -medium childcare on site. In the longer term it was anticipated that this would ease accommodation pressures in the area, with demand for Welsh medium pupil places increasing year on year. £1.14m of funding was awarded which enabled the provision of 2 extra classroom spaces and a new Welsh medium childcare provision.

The project has been successfully completed and is a very welcome and timely addition to the school. Pupil numbers have already shown an increase with both nursery and reception classes full in September 2021.

## 4. Additional Projects

In addition, over the past 4 years there has been significant capital funding for major refurbishment projects in eight existing Welsh-medium schools. The investment, which secures the future of these schools, ranges from boundary wall and toilet/changing facility refurbishment schemes to a new build kitchen block, boiler replacement and re-roofing. A new build 4 block extension at YGG Rhosafan and a new 60 place Foundation Phase classroom provision at YGG Castell nedd has also been provided as part of the Reducing Infant Class Size grant.

Ensuring sustainable growth of Welsh-medium places and achieving an increase in demand will require detailed and informed planning to ensure that we create the demand across all outcomes. We recognise that more pupils accessing their statutory education through the medium of Welsh is key not just for the WESP but the NPT Welsh Promotion Strategy and the national Cymraeg 2050 strategy.

The actions laid out in this outcome will work towards the desired increase in pupils entering Reception at Welsh-medium schools by proactively planning to increase demand and also fill the 26.7% (632 places) of surplus capacity that currently exist in

our Welsh-medium primary schools. Annual detailed action plans will outline how the demand will be created in specific areas within the Local Authority.

**Where do we aim to be within the first 5 years of this Plan and how we propose to get there?**

Our target is to increase the number of Year 1 children receiving WM education by 208 pupils by the end of the 10 year plan (this will mirror the number of children in Reception class as they commence full time education). We will ensure that an increase is also reflected in the transition rates within Outcome 3 and 4.

- We will review the demand for provision for Welsh-medium education on an annual basis, analyse the results of our parental surveys and draft appropriate action plans to address and create demand in specific areas and within specific groups.
- In order to create and stimulate demand we will appoint a consultant to promote the benefits of WM education and produce a marketing campaign i.e. website, leaflets, social media, and to liaise with and strengthen communication between different stakeholders etc. Specific emphasis will be given to reducing surplus places in the North of the Local Authority.
- In order to create and stimulate demand we will work closely with Mudiad Meithrin, Menter Iaith, Tŷ'r Gwrhyd and RhAG to inform parents/ carers of the benefits of Welsh medium education and bilingualism in order to ensure retention of pupils from Nursery to full time education. Welsh-medium primary schools in the north of the Local Authority have 459 surplus places (out of a total of 632). Specific emphasis will be given to reducing surplus places in the North of the Local Authority.
- Cylchoedd Meithrin will work closely with their local WM schools/ Family Information Service, Flying Start to ensure that a high percentage of children transfer to WM schools. Specific emphasis will be given to reducing surplus places in the North of the Local Authority.
- We will establish a new single form entry starter school in Skewen/ Neath Abbey. The current need for a Welsh medium school in this area is clear. The seedling school will have 210 places (one form entry) plus a 45 place Nursery. If the demand for Welsh medium education in the area continues to grow as expected, there is a possibility that the Welsh-medium seedling school will remain in Skewen and an additional Welsh medium school will be built in Coed Darcy to accommodate the increasing numbers. Alternatively, the starter school could transfer to a new building in Coed Darcy in line with capacity and pupil numbers. In depth demographic and geographic assessments will be completed in order to assess the situation when the developer achieves the required number of new build homes needed to trigger the construction of a new school as specified in the S106 Planning agreement. This will be subject to member approval and compliance with the extant criteria of the Schools' Organisation Code. Informal conversations have taken place with the head teachers of both YGG Tyle'r Ynn and YGG Castell-nedd around this proposal, and further more detailed discussions are expected to take place during the latter months of 2021, as it is recognised that it will be essential to gain the support and goodwill of these

schools to ensure that the proposed new school is promoted in the local area. Formal consultation has taken place and a final decision is expected in September 2022.

- Subject to member approval we will establish a new Welsh medium school in the east of the county borough. Early work on potential pupil numbers have identified that an increasing number of pupils currently travel from areas including Cwmafan, Taibach and Port Talbot town to YGG Rhosafan, which is continuing to also attract growing numbers of pupil from Sandfields, Aberafan and lower Baglan areas. We would also seek to create the demand for Welsh-medium education in this area in order to attract greater numbers of pupils from the lower Afan Valley and Margam areas which currently have low numbers of pupils accessing Welsh-medium provision. It is expected that funding for this new school would be sought from the appropriate Welsh Government capital grant funding stream available at the time. The initial plan for opening the second school in the south east of the Local Authority will be in place by 2024. We are currently working closely with Replacement Local Development Planning (RLDP) officers in order to identify possible sites and timetables to implement the build. Annual action plans for this outcome will further detail this development.
- To bring forward a proposal to create a third Welsh medium primary school within the 10 year plan. Funding will be sought from the appropriate Sustainable Communities for Learning programme grant funding streams. The location of the third School will be confirmed in the second half of the plan. We are currently working closely with Replacement Local Development Planning (RLDP) officers in order to identify possible sites and timetables to implement the build. Annual action plans will further detail this development.
- We will investigate using **pilot schools** with the aim of mapping out a continuum of staff training to be able to eventually create a category 2 stream within an English-medium school, starting at nursery and working through to Year 6 over a number of years. Early discussions have identified areas suitable for developing a scheme of this kind within the Swansea Valley and the Neath/ Baglan area. Information regarding the schools, specific quantitative data and timescales will be set and evaluated in our annual action plans.
- As a result of Welsh Government funding, we will develop immersion provision for latecomers to the Welsh language. The immersion provision will enable more learners to access Welsh-medium education at primary. The model will depend on need with the aim of having provision accessible to all areas of the Local Authority by the end of the plan.

Long term aim (Post March 2022-Local Authority funded) - The long term aim of the following model is to establish effective immersion hubs in both the north and the south of the Local Authority (in line with WESP targets). We will establish an immersion centre in YGG Pontardawe. This 16 place hub will open in September 2022 to stimulate a demand for Welsh-medium education in the north of the county. This location will also assist in developing the language in a linguistically sensitive area as well as potentially improving confidence and the transition rates to Welsh-medium secondary. The second hub in the south of the county will be located in YGG Rhosafan. This will also be a 16 place hub. We will look to establish provision for the secondary sector in the second half of the WESP with the aim of ensuring provision for late comers to Welsh medium education and pupils who are now in the system but need intensive linguistic support.

Short term aim (December 2021-August2022 WG grant funded)- The short term aim of the grant funding is to research into existing methodologies and good practice across Wales and to form effective networks that will assist in creating effective provision that will address learners' needs and support their progression both in the short and long term. An area within YGG Pontardawe will be identified and developed/ refurbished during the Summer term with the aim of officially opening a 16 place provision in September 2022. Resources for both hubs will be sourced and acquired during this period.

Quantitative targets will be identified and evaluated in the annual action plans and evaluation reports in order to ensure that enough demand is created and that outcomes are effective.

### Where do we expect to be at the end of our ten year Plan?

All children in all areas of Neath Port Talbot will have easy access to WM education as they progress from one stage to the next. Additional provisions set out above and an increase in WM settings/ schools will allow this and will lead to the projected increase of 208 pupils.

### Key Data

Numbers and % of 5-year olds receiving their education through the medium of Welsh

2022 - 2023		2023 - 2024		2024 - 2025		2025 - 2026		2026 - 2027	
288	19.7%	308	21%	327	22.3%	346	23.6%	365	24.9%
2027 - 2028		2028- 2029		2029 - 2030		2030 - 2031		2031 - 2032	
384	26.2%	403	27.5	422	28.8	441	30.0%	460	31.4%





- Proms- vocal and instrumental. Y5 and Y6 pupils from cluster schools attend YGYBD and are taught by staff and pupils for the day. It is followed by an orchestral performance in the evening (instrumental) or a performance by the YGYBD Cluster Choir (half time Ospreys rugby in Liberty)
- Gig Tanio'r Ddraig- Y5, 6, 7 pupils attend a music festival in YGYBD playing fields annually with the best of current Welsh bands and talent performing
- Cluster sports day for KS2 pupils from feeder primaries on YGYBD playing fields

However, there is a fall in numbers and percentage of learners choosing Welsh-medium education in the post-16 period. The numbers below show the percentage within Welsh-medium schools but there is also a small cohort in St Joseph's studying Welsh A level/ AS level 2<sup>nd</sup> language Welsh, and a small cohort of students studying A level and AS second language Welsh in NPTC Group of Colleges (see outcome 4 for details).

Plasc Pupil Numbers and Percentages in Welsh Medium Schools															
Year Group	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Year 12 - Numbers	106	110	85	88	97	95	90	110	99	84	109	120	108	92	95
Year 12 - Percentages	49.5%	53.1%	44.0%	48.1%	45.8%	42.4%	44.8%	49.3%	45.8%	42.4%	46.8%	53.6%	48.2%	41.8%	40.1%
Year 13 - Numbers	78	89	98	91	72	93	81	67	93	99	65	87	100	95	82
Year 13 - Percentages	43.3%	48.1%	51.0%	47.4%	42.4%	42.5%	41.8%	37.9%	46.3%	49.7%	40.1%	48.1%	54.9%	50.0%	40.8%

Authority staff are working with Ysgol Gymraeg Ystalyfera Bro Dur to consider how post-16 education can be provided in the most effective and efficient way considering what options are available for online provision or blended learning will enable us to implement the highest quality post-16 provision in a way that is compatible with the technology and techniques developed in recent months. This is a discussion but may offer or be part of a short term solution and possibly reduce travel requirements.

Consideration needs to be given to the post-16 provision at the Bro Dur site. This is outlined further in Outcome 4.

### Where do we aim to be within the first 5 years of this Plan and how we propose to get there?

Our target is to increase the number of pupils receiving WM education by 208 pupils and to retain a higher percentage of these pupils within the system by the end of the 10 year plan. We aim to do this by implementing the following targets.

- The WESP forum will monitor the transition rates and to adapt and amend the Strategic Plan in line with the results of the data
- The Local Authority, along with the WESP working parties, will create a policy setting out the Local Authority's expectations of pupils continuing within the Welsh sector. All schools will support and implement the policy when dealing with

parents, resulting in a collective responsibility to support parents and encourage confidence.

- There will be central messages from the authority through our new Policy to ensure that pupils are encouraged to remain in Welsh-medium education when transferring from one key stage to the next.
- The Local Authority and the WESP forum will support and strengthen the work of the cluster and parents' confidence in the Welsh language. They will encourage early support and preparation within the Primary sector to communicate expected pathways to pupils and parents through the promotional strategies outlined in Outcome 1.
- Stakeholders i.e. schools, Menter Iaith, RhAG, Tŷ'r Gwrhyd will gather information and identify parents' concerns during transfer.
- The Local Authority will provide guidance in order to support parents and alleviate concerns. Services including the Family Information Service and admissions will play a key role in this support.
- The Local Authority will explore using a Promotional Consultant to implement the 'Choice Architecture Model' for organising the context in which parents decide on secondary education for their children.
- A Local Authority Policy will ensure that every school implements the Welsh Language Charter and sets targets aimed at improving Welsh language skills.
- There will be a Local Authority led programme of enrichment activities for schools (all sectors) to encourage development of Welsh language skills. Working in partnership with third sector providers i.e. Urdd, PASS, Tŷ'r Gwrhyd.
- There will be a Local Authority led programme of support for schools to ensure that Welsh is high on the agenda and is being promoted as a valuable and essential skill in line with Y Gymraeg 2050. This will be led by our Education Support Officers.
- The Local Authority will develop a support package for schools to monitor progress. This will be discussed and developed further during core visits from Education Support Officers. This support will include information on developing staff and pupils through various courses, signposting good practice and projects i.e. Cynefin (web based local Welsh history and culture platform for schools to develop).
- As a result of Curriculum Developments for Wales, there will be Local Authority level support for schools to develop the visibility of the new curriculum with the focus on confidence in the Welsh language.
- Case studies to market good practice and raise status (work in partnership with Menter Iaith) will be publicised via a promotional campaigns, social media and websites.
- Rich marketing programmes will raise the profile of the Welsh language and give Welsh-medium education a high status – A Brighter Future (working in partnership with Menter Iaith).
- There will be provision to provide an enhanced workforce skilling programme to meet the needs of outcome 3 in improving pupils' skills across all sectors.
- We will invest in immersion provision for latecomers to the Welsh language. The immersion provision will enable more learners to access WM education at primary and secondary level. The model will depend on need with the aim of having provision accessible to all areas of the Local Authority by the end of the plan. See outcome 2 for details.

- By the second half of the WESP, with growth at key stage 2, the Bro Dur site will reach a full capacity of 650, an increase of 150. As a result of this growth, we will need to consider expanding the capacity within Welsh-medium secondary education. We are currently working closely with Replacement Local Development Planning (RLDP) officers and Headteacher in order to identify options and timetables to implement the developments. Annual action plans will further detail this development.
- We will ensure that the whole educational journey from nursery to post-16 is clear to families in order to further develop confidence in choosing Welsh-medium. In order to ensure this continuum, we will need to develop and provide accessible Welsh-medium education, including post-16 provision at vocational and A level within the Local Authority. Development details and quantitative targets will be identified and evaluated in the annual action plans and evaluation reports.

### **Where do we expect to be at the end of our ten year Plan?**

By the end of the 10 year plan we will see a significant increase in the number of learners transferring from WM primary to YGYBD as well as an increase in the number of learners remaining in WM education from KS3 to KS4 (see Outcome 4). It is intended to see an increase in the number latecomers changing to WM education as a result of successful immersion, as parents become more informed and confident with WM education.

## Outcome 4

### More learners study for assessed qualifications in Welsh (as a subject) and subjects through the medium of Welsh

#### Where are we now?

As outlined in Outcome 3, pupils who have attended Welsh-medium primary education are strongly encouraged to follow the same continuum through the key stages.

Pupils at Ysgol Gymraeg Ystalyfera Bro Dur secondary phase are able to study all subjects at GCSE level through the medium of Welsh. Science is optional with learners choosing either to be taught through the medium of Welsh or English on the Ystalyfera site. At present YGYBD secondary phase offer in excess of 36 KS3 courses through the medium of Welsh at GCSE, BTEC, Welsh Bacalaureate, Agored Cymru Tystysgrif Lefel 2 and vocational CBAC level.

All sixth form pupils at Ysgol Gymraeg Ystalyfera Bro Dur secondary phase can study their chosen subjects through the medium of Welsh, with the exception of Science. At present, 28 pupils study A level Biology, 18 study A level Chemistry and 15 study A level Physics through the medium of English. These subjects are currently not available through the medium of Welsh.

The Local Authority recognises the need to cater for vocational courses through the medium of Welsh at KS4.

The data for assessed qualification in Welsh as a subject at GCSE, A level and AS level is as follows:

#### Numbers and % of pupils studying the first and second language Welsh specification at GCSE level

Year	11 Cohort	1st Language GCSE	2nd Language GCSE	2nd Lang (SC GCSE)	Total	Total % of cohort	% cohort 1st Language GCSE	% cohort 2nd Language GCSE	% cohort 2nd Lang SC GCSE
2018	1486	190	917	40	1147	77%	13%	62%	3%
2019	1456	166	1038	0	1204	83%	11%	71%	
2020	1513	171	984	0	1155	76%	11%	65%	
2021	1619	196	1061	0	1257	78%	12%	66%	

	AS Welsh 2nd Language	AS Welsh 1st Language	A Level 2nd Language	A Level 1st Language
2019	5	4	3	5
2020	1	5	2	5
2021	2	1	1	4

Numbers of pupils studying the first and second language Welsh specification at A and AS level (YGYBD secondary phase and St. Joseph's)

	Year 12 St Joseph's	Year 13 St Joseph's	Year 12 Ystalyfera	Year 13 Ystalyfera	Total year 12	Total year 13	Overall Total
2019	110	76	109	100	219	176	395
2020	121	99	92	88	213	187	400
2021	133	94	96	81	229	175	404

The NPTC Group of Colleges offers AS and A Level first and second Welsh language courses. Figures from the past three years can be seen below:

	AS Welsh 2 <sup>nd</sup> Language	AS Welsh 1 <sup>st</sup> Language	A Level Welsh 2 <sup>nd</sup> Language	A Level Welsh 1 <sup>st</sup> Language
2019	21	0	13	0
2020	8	0	11	0
2021	7	0	3	0

Also, to date units from the following courses at NPT Group of Colleges have been translated / delivered in Welsh or bilingually:

- Mathematics
- Construction
- Agriculture
- Sport
- Public Services
- Childcare
- Hairdressing

The Urdd also offers apprenticeships through the medium of Welsh within the Local Authority. The apprenticeships offer new opportunities to learn, develop and increase confidence in the workplace. From sports, outdoor activities and youth work apprenticeships to qualifications and accreditations, the Urdd offer a range of opportunities for all ages and abilities.

**Where do we aim to be within the first 5 years of this Plan and how we propose to get there?**

Our target is to increase the number of pupils receiving WM education by 208 pupils and to retain a higher percentage of pupils studying for assessed qualifications through the medium of Welsh and Welsh as a subject by the end of the 10 year plan. We aim to do this by implementing the following targets.

- Raise the status of the Welsh language as a medium of study and work across all education system partnerships.
- Develop a language and learning continuum across all progression steps. Promoting learner confidence and parental reassurance.
- Research and seek local knowledge on parents' attitudes in all schools where there is a lack of transition.
- Monitor post 16 welsh medium uptake. WESP to be adapted in line with data.
- At present, there is no vocational provision in the Local Authority outside YGYBD. The role of Colegau Cymru (Neath / Afan College) Vocational Courses – skills workforce, will need to develop to include Welsh medium and bilingual courses.
- Establish Bro Dur as a Post-16 Welsh Medium Vocational Qualification centre, providing pathways for ALL pupils in line with Scandinavian model where national qualification programmes are divided into two categories: preparatory and vocational. Preparatory programmes satisfy the requirements needed to study university courses in specific subject areas. Vocational education provides learning which builds on secondary education and prepares students for the labour market. It is developed and run in close cooperation with employers and industries.
- Provide courses that ensure an increase in the Early Years workforce in order to fulfil the increased demand for Welsh-medium education within the 10 year plan.
- Work with Careers Wales and Colegau Cymru to develop a menu of Welsh medium and bilingual apprenticeships for the current pupils in the system.
- Include the Urdd in future post 16 qualification discussions with the aim of increasing the number of students completing apprenticeships with the Urdd through the medium of Welsh.
- Increase numbers who choose Science GCSE through medium of Welsh in YGYBD (currently Welsh/ English optional). By 2025, the default language for Science GCSE will be Welsh. Pupils will be encouraged to choose Science through the medium of Welsh and will have to apply to opt out of the Welsh language course. By the end of the 10 year plan, 100% of pupils will complete their Science GCSE through the medium of Welsh. This target will be monitored closely in our annual plans and further mid-term targets will be set accordingly.
- Work towards transitioning A level science to Welsh medium (currently all English). By 2027 (to ensure progression from Welsh-medium GCSE), the default language for Science A level will be Welsh. Students will be encouraged to choose Science through the medium of Welsh and will have to apply to opt out of the Welsh language course. By the end of the 10 year plan, 100% of pupils will complete their

Science A level through the medium of Welsh. This target will be monitored closely in our annual plans and further mid-term targets will be set accordingly.

- English medium schools to provide and deliver high quality Welsh language Teaching and Learning in line with new curriculum and one equal qualification (no second language Welsh GCSE)
- Promote Welsh across the curriculum (and not Welsh in isolation) in all schools, with the expectation that all teachers will be able to promote, enrich and encourage the process of developing Welsh as a language.
- Provide a menu of language support and training for staff of all levels and identify gaps in provision.
- Employ a Welsh in Education Promotion Officer to support / lead the 'need for Welsh', with the aim of changing mindsets. Co-ordinate the provision across the Local Authority. Embed the new vision for Welsh medium and Welsh education across all providers.
- Provide support for Bro Dur as KS4 pupils transfer to KS5. Ensure suitable routes and transport for these pupils.

Careers Wales to promote Welsh language as essential skills for the future within the Local Authority, emphasising the requirement for Welsh language skills in all jobs by 2030.

#### **Where do we expect to be at the end of our ten year Plan?**

By the end of the 10 year plan, we aim to see a significant increase in the percentage of qualifications studied through the medium of Welsh as learners and parents become more confident in choosing Welsh medium education.

There will also be a wider variety of vocational qualifications taught through the medium of Welsh available within the Local Authority in order to allow full access of the Welsh language to all learners.



## Outcome 5

### More opportunities for learners to use Welsh in different contexts in school

#### Where are we now?

The targets for this outcome have been developed alongside the targets set out in the Neath Port Talbot Welsh Language Promotion Strategy (alongside Priority 1) with emphasis on promoting and facilitating the use of the Welsh language and increase its use in everyday life within schools and the wider community.

It also aims to promote the Curriculum for Wales Framework by ensuring that All learners should have appropriate pathways for learning Welsh and English to enable them to develop the confidence to use both languages in everyday life. It aims to support learners to use Welsh confidently and appreciate its usefulness to communication in a bilingual Wales.

The Authority recognises that having varied opportunities to use the Welsh language in different contexts within the school environment is key to promoting confidence. Learners, parents and carers will need to be supported and encouraged to participate in a variety of experiences and opportunities through the medium of Welsh in order to improve their confidence in the language.

The Siarter Iaith was an integral part of most schools pre Covid with most Welsh schools and many English medium schools increasing the social use of Welsh within school and the wider community in a variety of creative and successful ways. To date, the following data demonstrates the success of the Siarter Iaith and Cymraeg Campus pre Covid:

- 9 Welsh medium primary schools have achieved the Siarter Iaith silver award,
- 1 Welsh medium primary school has achieved the Siarter Iaith gold award,
- 45 English medium schools are currently engaged in the Welsh Charter scheme 'Cymraeg Campus' at the moment,
- 17 English medium schools have achieved the Cymraeg Campus bronze award

Covid and long periods away from school sites has had a negative impact on this progress and the Authority recognises the need to promote and develop the Siarter Iaith in order to regain the confidence lost during lockdown periods.

The Authority also recognises the need to work with organisations such as Academi Hywel Teifi, Tŷ'r Gwrhyd, Menter Iaith, Mudiad Meithrin and Urdd Gobaith Cymru to provide learning opportunities for non-Welsh speaking learners, parents / carers and grandparents or those who are hesitant in the language in order to raise their confidence and assist with their children's education. This will be key to the success of our strategy.

### **Menter Iaith**

Menter Iaith currently provide a wide range of opportunities for children and young people with the Local Authority:

- arrange staff training sessions for the Childcare sector
- arrange family activity sessions/ days e.g. fun days, singing sessions
- create and distribute language awareness packs with the aim of providing parents with the information needed to make informed choices about their child's education/ promote the benefits of Welsh medium education
- attend open days within schools and the community with the aim of providing information and promoting the Welsh language
- work closely with schools i.e. Gig Tanio'r Ddraig (Welsh music festival, Cwis Dim clem (quiz), language awareness sessions with staff, pupils and parents, information evenings with parents to promote transition to Welsh medium secondary education etc.
- arrange social events for primary age learners (outside of school hours) e.g. cooking sessions, parties, treasure hunts
- arrange social events and activities for secondary age learners e.g. surfing, youth clubs, fun days
- jointly employ a youth worker (with Ysgol Gymraeg Ystalyfera Bro Dur) with a specific role of promoting activities through the medium of Welsh
- produce and share (via website) a wide range of Welsh medium resources
- produce and distribute 'Cymraeg Campus' newsletter to all English medium schools with resources, 'top tips' and ideas on how to raise the profile of Welsh in their local area
- Facebook group to support parents and teaching staff

### **Urdd**

The Urdd provides a wide range of opportunities for learners and the wider community to participate in various activities to promote a sense of belonging and the Welsh language. These include:

- Eisteddfod: Pupils from the Local Authority have the opportunity to take part in over 400 competitions, from singing to cooking, dancing to designing websites, and writing stories to starring on stage
- sporting activities: provides opportunities across the Local Authority for every child and young person to embrace sport, through clubs, competitions, training, and regional and national sports festivals.
- residential centres: pupils from the Local Authority visit centres in Glan-llyn, Llangrannog, Cardiff and Pentre Ifan. This supports learning outside of the classroom and provides an excellent context for the use of the Welsh language in a fun environment.
- community and youth work: The Urdd Community Department focuses on providing arts opportunities to members within the Local Authority. They arrange activities to encourage and enable children and young people to socialise through the medium of Welsh outside the classroom. The Urdd also develop the Urdd's 'adrannau' and 'aelwydydd' (junior and youth clubs) and provide a range of Welsh-medium resources.

### **Ty'r Gwrhyd**

Ty'r Gwrhyd is a Canolfan Gymraeg in Pontardawe, jointly established by Neath Port Talbot Council and Academi Hywel Teifi at Swansea University in 2016. Ty'r Gwrhyd houses a Welsh-language bookstore, and rents office space to Menter Iaith CNPT, Urdd Gobaith Cymru officers and Dysgu Cymraeg Ardal Bae Abertawe tutors. Welsh language educational courses are delivered at the centre, as are Welsh language lessons for adults. Community groups, including Merched y Wawr, Cylch Darllen Cwm Tawe and papur bro *Llais*, make regular use of the facilities at the centre. The centre hosts regular book launches, small art exhibitions, cultural and literary events and creative activities for children and young people. Ty'r Gwrhyd is also home to Cylch Ti a Fi Pontardawe and a reading club for primary age children which attracts pupils from throughout the Swansea Valley from Cwmllynfell to Clydach.

There is currently no provision within the Authority for children and young people who are latecomers to Welsh-medium education to access a Welsh language immersion centre, learners' needs are catered for within individual schools. This target is addressed in Outcome 2.

### **Where do we aim to be within the first 5 years of this Plan and how we propose to get there?**

Our aim is to create and provide opportunities and experiences for all learners and the wider community to use Welsh and be part of Welsh life in order to increase confidence in the Welsh language and to feel a sense of belonging. We will do this by implementing the following targets.

- Designated staff will re-launch the Siarter Iaith ensuring that it is embedded in all new curriculum designs. Schools will progress on the Siarter continuum and will be supported along the journey with guidance and resources.
- By September 2022, all Welsh and English medium schools will have reviewed and revisited previous Siarter Iaith/ Cymraeg Campus targets and will achieve the pre Covid standards.
- By September 2024, the Siarter Iaith/ Cymraeg Campus will be an integral part of planning for the Curriculum for Wales within all schools, with an emphasis on a whole school progression approach (supported by our Welsh in Education officer and Curriculum Development Officer (Welsh in English medium)). This will increase learner and staff confidence in using the Welsh language and impact positively on the ethos of all schools.
- By September 2024, Siarter Iaith/ Cymraeg Campus action plans/strategies will be used to ensure regular opportunities for learners, staff and the wider community to engage in activities that increase confidence in the Welsh language and promote Welsh modern culture and history. This will lead to an increased awareness of the relevance/ importance of Welsh in their everyday lives. This will be monitored and supported by our Welsh in Education officer and Curriculum Development Officer (Welsh in English medium).
- We will continue to build on the huge success of our annual 'Gig Gymraeg' within the YGYBD cluster for Y6 and Y7 learners. We will aim to roll this out

across the LA, ensuring that all Y6 pupils in WM and EM schools have access to a contemporary WM music festival on an annual basis. This will be supported by Menter Iaith CNPT.

- We will aim to roll out the 'Gig Gymraeg' to all Y8 and Y9 pupils along with Y12 pupils at a large central venue i.e. Margam in order to provide an opportunity to speak Welsh and enjoy Welsh contemporary culture outside of school.
- A leading excellent practice English medium school has been identified and this school will share resources and ideas and support other schools with their curriculum design, ensuring that Welsh culture, history and appreciation of the local area is embedded in their new curriculum.
- The NPT schools website, created by learners, to promote modern Welsh culture, history and local area will be launched and added to on a regular basis in all Welsh medium schools and rolled out to all English medium schools.
- An audit will be undertaken to see what WM provision is available within the LA (both within school and in the community) and geographical gaps will be identified and filled i.e. provision from Urdd, PASS, Youth Service etc. Following the audit, a menu of support will be created for all schools within the LA.
- By September 2022, the Local Authority's agencies and third sector services will have introduced a baseline and targets that will demonstrate their intention to increase community activities.
- We will track and evaluate the targets annually using quantitative and qualitative data.
- All schools will be encouraged to use the Urdd Residential Centres to promote the Welsh language in a fun and relaxed environment.
- All schools will be encouraged to partake in Urdd Eisteddfod activities with the aim of increasing confidence in the language and increasing awareness of Welsh literature, music and the arts.
- We will work closely with partners including Academi Hywel Teifi, Tŷ'r Gwrhyd, Menter Iaith, Urdd to ensure provision and promotion of learning opportunities for non-Welsh speaking learners, parents / carers and grandparents or those who are hesitant in the language in order to raise their confidence and assist with their children's education. This will be in conjunction with the NPT Welsh Language Promotion Strategy, Priority 1.
- We will listen to our learners across all sectors and ages to obtain views and ideas on promoting the Welsh language, contemporary culture, history and a feeling of belonging. Pupil voice will be essential in reviewing and setting our annual action plan.
- As a result of Welsh Government funding, we will develop immersion provision for latecomers to the Welsh language. The immersion provision will enable more learners to access Welsh-medium education at primary. The model will depend on need with the aim of having provision accessible to all areas of the Local Authority by the end of the plan.

Long term aim (Post March 2022-Local Authority funded) - The long term aim of the following model is to establish effective immersion hubs in both the north and the south of the Local Authority (in line with WESP targets). We will establish an immersion centre in YGG Pontardawe. This 16 place hub will open in September 2022 to stimulate a demand for Welsh-medium education in the north of the county. This location will also assist in developing the language in a

linguistically sensitive area as well as potentially improving confidence and the transition rates to Welsh-medium secondary. The second hub in the south of the county will be located in YGG Rhosafan. This will also be a 16 place hub. We will look to establish provision for the secondary sector in the second half of the WESP with the aim of ensuring provision for late comers to Welsh medium education and pupils who are now in the system but need intensive linguistic support.

Short term aim (December 2021-August 2022 WG grant funded)- The short term aim of the grant funding is to research into existing methodologies and good practice across Wales and to form effective networks that will assist in creating effective provision that will address learners' needs and support their progression both in the short and long term. An area within YGG Pontardawe will be identified and developed/ refurbished during the Summer term with the aim of officially opening a 16 place provision in September 2022. Resources for both hubs will be sourced and acquired during this period.

Quantitative targets will be identified and evaluated in the annual action plans and evaluation reports in order to ensure that enough demand is created and that outcomes are effective.

- We will develop via a locally based task and finish group, a holistic plan which looks in detail at all aspects of the vitality of the Welsh language in areas of linguistic sensitivity and establish working groups to consider thematic issues such as the use of the language by the private sector, by voluntary groups and by young people in general. Areas for possible collaborative working:
  - Preschool Provision and location
  - Marketing Welsh-medium education
  - Provision and take up of Welsh for adults
  - Language confidence building events
  - Promoting the use of Welsh by private and voluntary organisations
  - Activities and entertainment for young people and young adults
  - Employment and economic development

### **Where do we expect to be at the end of our ten year Plan?**

All schools within the Local Authority will be fully engaged with Curriculum for Wales in conjunction with the Siarter Iaith. The Welsh language, contemporary culture and history will be integral to curriculum design. We will see an increase in learner and staff confidence and pride towards being Welsh and the Welsh language. The Welsh language and the associated extra-curricular activities will be inclusive and will radiate into the wider community, allowing all to have access and to develop their Welsh-language skills.

## Outcome 6

**An increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN) (in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018**

### Where are we now?

As a result of the Additional Learning Needs and Educational Tribunal Act (Wales) 2018, significant changes are underway in relation to the statutory provision required to meet the needs of all learners with ALN. All services within the local authority will be required to consider whether the child or young person needs ALP (Additional Learning Provision) in Welsh.

At present, for learners with significant ALN who cannot access mainstream education within primary and secondary schools, specialist provision is provided which include:

Primary LSCs	
Abbey	EYAC
Blaenbaglan	SpLg
Cilffriw	SpLg
Gnoll	ASD
Maesmarchog	ASD
Waunceirch	ASD
Blaendulais	MLD
Blaenhonddan	MLD
Croeserw	MLD
Trebannws	MLD
Tywyn	MLD
Tywyn	SLD
Tywyn	PMLD
Catwg	Sensory
Crynallt	SEBD
Awel y Mor	SEBD

Secondary LSCs	
Ysgol Bae Baglan E Band	MLD and SpLg
Ysgol Bae Baglan F Band	ASD, HI, SLD, PMLD
Dwr y Felin	ASD
Cwmtawe	ASD
Cwmtawe	SpLD
Cefn Saeson	SENC

Special Schools
Ysgol Hendrefelin
Ysgol Maes Y Coed

Currently the data provided from Welsh medium schools is not evidence enough for the requirement for specialist provision in a specific area of need. However, it is difficult to currently predict the level of need for specialist provision in the future. The authority will work to ensure *'all reasonable steps are taken to deliver ALP in Welsh for children and young people who require support through the medium of Welsh, with scope for increasing the delivery of ALP in Welsh over time'* (The ALN Code for Wales 2021, 3.2.(e)).

It is recognised that Welsh-medium schools need further support from the LA to build their capacity to meet the needs of learners with ALN. The authority continues to monitor this situation and continues to engage with the Welsh medium sector on demand and need.

Specialist services are able to provide almost all services through the medium of Welsh and best endeavours are made to recruit specialist staff who are able to work through the medium of Welsh.

The local authority has worked closely with schools over the past three years to prepare for the implementation of ALN reform. This has included training, workshops and cluster planning events. WM schools have contributed to and received bilingual tools to follow new decision making processes. A comprehensive bank of bilingual resources have been provided to our Welsh medium schools and the Inclusion Service will continue to work in partnership with Welsh medium schools to further develop robust Inclusive Learning Provision(ILP) and Additional Learning Provision (ALP) offers, to meet the range of needs of pupils with ALN.

NPT Inclusion Service has developed a regional Early Resolution and Dispute Prevention training package, to further develop parent partnership and training and bilingual materials have been provided to our WM schools.

#### **Where do we aim to be within the first 5 years of this Plan and how we propose to get there?**

- Continue to collect detailed data and information to set a baseline for current provision, to recognise gaps in provision and to set quantitative targets and time lines for improvement over the 10 year plan.
- We will provide information and advice for children and young people and their families, ensuring school and council websites include information about addressing the needs of pupils in Welsh-medium education and about specialist provision.
- The Local Authority commits to develop plans to establish a Welsh-medium learning support centre at YGG Trebannws, ensuring that this is a gradual, steady process transitioning from predominantly English-medium provision that exists, to a bilingual provision and eventually to a fully Welsh-medium provision.
- We will include the provision of a 16 place Welsh-medium learning support centre in the plans to build a replacement YGG Rhosafan, as part of NPT's appropriate Sustainable Communities for Learning Programme Band C proposals.
- Continue to develop a comprehensive professional development training menu and support for teachers within our Welsh medium mainstream schools and for our Early Years and Childcare Sector. This will enhance the Inclusive Learning Provision (ILP) and Additional learning Needs Provision (ALP) offer within our Welsh Medium schools and Early Years settings, as set out in the new ALN Code for Wales 2021. This training and support offer, including a review of resources and appropriate assessment material, will be reviewed annually and

will be informed by any changing need within our WM mainstream schools and Early Years and Childcare Sector.

- Undertake a biannual audit of the additional learning needs (ALN) of Welsh medium language learners and review our specialist planned places, in order to inform current and map future emerging need for Welsh medium provision for our most complex children and young people with ALN.
- Support and enable the development of a variety of specialist preschool provision to facilitate the early identification of emerging needs for our youngest children, where Welsh is first language or there is a parental preference for Welsh medium provision.
- Invest in bilingual specialist playgroup and childcare provision to support the early identification of emerging needs for our youngest children, where Welsh is first language or there is a parental preference for Welsh medium provision.
- Invest in a bilingual specialist provision and specialist staff within the local authority or with regional partners, to secure the capacity to deliver a Welsh medium specialist provision for children and young people with more complex additional learning needs.

#### **Where do we expect to be at the end of our ten year Plan?**

All pupils with ALN within the local authority will have access to provision at all levels through the medium of Welsh. Collaboration with regional partners will provide a comprehensive range of resources, training opportunities and networking to ensure that Welsh medium provision will be of a high standard and complies with the Additional Learning Needs and Educational Tribunal Act (Wales) 2018. Early Years and pre-school WM ALN support, assessments and provision will provide increased confidence in parents when choosing Welsh medium education for their children.



## Outcome 7

### Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh

#### Where are we now?

Current data and targets can only be based on reported data reflecting the self-assessment of fluency by individual members of staff.

The most recent data about the education workforce in NPT shows a plateau in the percentage of school teaching staff able to speak Welsh and teach through the medium of Welsh.

#### Recent Workforce Data

At 31.3.2022, 843 employees self-reported that they are fairly fluent/fluent in speaking and writing Welsh. Of these, 514 were schools' employees. The total employee headcount on this date was 6385.

Previous data relating to school staff is outlined below:

SWAC - Teacher Welsh Language Ability																
SWAC Year	School Teaching Staff - Welsh Language Ability (Numbers)								Total	School Teaching Staff - Welsh Language Ability (%)						
	W1 - No Welsh Skills	W2 - Entry Level	W3 - Foundation Level	W4 - Intermediate Level	W5 - Advanced Level	W6 - Proficient Level	W7 - Not Obtained	W1 - No Welsh Skills		W2 - Entry Level	W3 - Foundation Level	W4 - Intermediate Level	W5 - Advanced Level	W6 - Proficient Level	W7 - Not Obtained	
2019	252	269	270	92	57	234	8	1182	21.3%	22.8%	22.8%	7.8%	4.8%	19.8%	0.7%	
2020	254	275	276	99	58	249	1	1212	21.0%	22.7%	22.8%	8.2%	4.8%	20.5%	0.1%	
2021																

SWAC - Teaching Through the Medium of Welsh												
SWAC Year	Teaching Through Medium of Welsh (Numbers)					Total	Teaching Through Medium of Welsh (%)					
	T1 - Teach/work in Welsh in current post	T2 - Able to teach/work in Welsh but not doing so in current post	T3 - Not able to teach/work in Welsh	T4 - Teaching Welsh as a subject only	No Answer		T1 - Teach/work in Welsh in current post	T2 - Able to teach/work in Welsh but not doing so in current post	T3 - Not able to teach/work in Welsh	T4 - Teaching Welsh as a subject only	No Answer	
2019	205		81	442	447	7	1182	17.3%	6.9%	37.4%	37.8%	0.6%
2020	218		77	448	468	1	1212	18.0%	6.4%	37.0%	38.6%	0.1%
2021												

A significant growth of the workforce able to teach Welsh and through the medium of Welsh is critical in order for Neath Port Talbot to succeed in delivering the growth of Welsh-medium education and Welsh speakers in our schools. We recognise that as well as recruiting a sufficient high quality workforce for our new Welsh-medium schools, we will need to upskill staff and the learning workforce in English-medium schools in order to ensure that a greater amount of teaching and learning is done through the Welsh language.

At present, the Welsh Sabbatical course is offered to all schools within the Local Authority. The numbers of staff who have attended the course is as follows:

Welsh Sabbatical Course- Numbers of NPT staff attending				
2017	2018	2019	2020	2021
1	4	5	3	3

We recognise that there is a need to heavily endorse and promote this course in order to strategically increase the numbers of Welsh-speaking staff within our English-medium schools and succeed in our aim to provide bilingual education throughout the Local Authority.

To achieve a greater awareness and level of ability in the Welsh language within our English-medium schools, teaching staff within the Local Authority have been encouraged to attend Welsh language courses run by Academi Hywel Teifi (courses tailored to suit all abilities from entry level to higher level). The Local Authority monitors the number of staff attending and promotes the provision when needed.

At present, YGYBD are working closely with PGCE students from Swansea University's School of Education ITE programme and Academi Hywel Teifi to train and promote teachers in Welsh-medium education. Thirteen students were placed in WM settings (YGYBD secondary phase sites) through this partnership in 2020-21 and 14 students in 2021-22, with a focus on subject needs within the workforce i.e. Welsh, English, biology, chemistry, physics, MFL, mathematics, DT and computer science. Furthermore, all student-teachers on the PGCE programme receive mandatory 30 hours of Welsh-language learning/enhancement as part of their course (the provision is tailored to where the individual is on their language continuum and ranges from ensuring basic conversational Welsh to enhancing fluency). All are offered further Welsh language learning opportunities once they've achieved their qualification; all graduate with a good level of language awareness and understanding of the bilingual educational context of Wales.

From September 2021, the Swansea University Schools' Partnership (SUSP) will also deliver a unique one year full-time Postgraduate Certificate in Education (PGCE) Primary with Qualified Teacher Status (QTS). After experiencing teaching placements across the primary age phase, the student teacher can choose to specialise in Foundation Phase, Key Stage 2 or All- Age contexts. The programme is heavily promoted in south Wales with a view to securing student-teachers that will enter the workforce in their home localities. By placing these student-teachers within our NPT schools as they train, we envisage forging links with potential new staff and securing a workforce that's well-equipped to address the changing face of education in a bilingual Wales.

Developments are also afoot in the NPTC Group of Colleges which has received further funding from Colleges Wales / The National Centre for Learning Welsh to recruit a Work Welsh tutor that solely delivers Learn Welsh courses to NPTC Group of Colleges staff. The Work Welsh target is to provide 120 hours of Welsh to increase bilingual and Welsh-medium delivery in post-16 education, therefore concentrating on academic staff. There are currently 26 staff on the scheme. The 'Welcome' course (Cwrs 'Croeso') has also given NPTC Group of Colleges staff an opportunity to learn and develop their Welsh language skills in the workplace. Due to the success of the course, Work Welsh have used NPTC Group of Colleges as an example in their past case studies for good practice. They were also awarded Work Welsh Employer of the year 2020. Online Work Welsh courses have been built into the College induction scheme for all new staff and are also offered as CPD targets to all staff, therefore

ensuring that staff at NPTC Group of Colleges continue to develop their Welsh language skills. The College has also developed a strategic approach (HR Linguistic Skills Strategy) to recruiting and training staff to close the skills gap between current capacity and the requirements identified in the new Welsh Language Standards and Towards Cymraeg 2050, by introducing a benchmarking exercise.

**Where do we aim to be within the first 5 years of this Plan and how we propose to get there?**

We aim to increase the number of teaching staff able to teach through the medium of Welsh in all sectors by the end of the 10 year plan. We aim to achieve this by implementing the following targets.

- We will devise and implement a system of targeting schools according to greater need to nominate individuals to attend the National Sabbatical Scheme with a view to enabling at least 3 teachers per year to attend. The Local Authority will also monitor and ensure that the learning and knowledge is cascaded within each school that benefits from the scheme with a view to creating a changed culture, ethos and language practice within the school.
- The Local Authority will complete a biannual audit and detailed analysis of Welsh speakers able to teach through the medium of Welsh in all sectors. This will include teachers, TA's, youth workers etc. This data, along with projected pupil numbers and workforce planning data involving projected retirements, will be used to capture the required number of staff needed for the future and pinpoint schools, in order to drive the Local Authority's recruitment plans and Welsh-language learning initiatives for staff.
- Based on the data analysis of the biannual Welsh speakers' audit, we will set biannual targets for increasing the proportion of the workforce with language skills at foundation level, and at intermediate level or higher and will report on these as part of the annual monitoring.
- We will undertake regular analysis of all data sources to understand trends in the demand for Welsh-medium teachers. This will include projecting annual transition rates of learners from primary to secondary education and looking at trends in terms of numbers of teachers moving into leadership roles, moving schools or leaving/ retiring from the profession.
- We will undertake a regular analysis of how many staff have Welsh language skills in English-medium schools in order to identify gaps and target schools/ staff for further Welsh language training and immersion.
- By 2023, the authority aims to ensure that at least one member of staff has been identified in every English-medium Primary School who will have the linguistic skills to lead the Welsh language within the organization. English-medium schools will be required to identify a community of staff with Welsh-language skills that will drive their school's engagement with the language and the WESPs targets. Our aim here is to ensure whole school involvement in this agenda thus avoiding the risk of leaving isolated individuals to deliver on school and county-wide targets.
- The Local Authority will ensure that a teaching member of staff's ability to learn /improve their Welsh language skills is factored into that individual's

worktime and workload and that recognition of their progress and effort will be documented in their annual personal development record.

- The HR department will audit the number and place of work of all Welsh speakers within the Authority in order to ensure Welsh medium non-teaching staff are allocated to Welsh medium schools, thus strengthening provision and communication.
- We will establish a workforce forum by September 2023 to respond to recruitment gaps and challenges in the authority. The information gathered will form part of the national workforce strategy.
- The Local Authority commits to ensuring a professional support service that can speak Welsh by appointing and upskilling employees currently in the system.
- We will access schemes through Mudiad Meithrin to provide language immersion methods and training for staff across the county.
- The authority recognises its proactive role in promoting opportunities to engage with the workforce across the whole range of Local Authority services. One of the main responsibilities of the promotion Officer will be to facilitate this work - commence September 2022.
- The Local Authority will set out clear guidelines for use by schools, governing bodies and HR when recruiting new staff, outlining the expectation in terms of the Welsh language. School Governing Bodies will be required to address this ongoing aim as a standing agenda item.
- We will provide an efficient translation service within the Local Authority to ensure that Welsh and English correspondence have equal status.
- We will continue to build on the effective ITE partnership between YGYBD and Swansea University and ensure maximum engagement with the new Primary programme.
- PGCE students from Swansea University and the Careers Service will hold regular information sessions with staff and pupils from Y10-13 in both Welsh and English medium schools, outlining the benefits of a career in education and the integral role the Welsh language plays in this.
- We recognise the need to increase the early years workforce and practitioners who can speak the Welsh language in education and early years. We will work with partners to ensure and promote opportunities for practitioners to access Welsh-medium childcare courses. We will identify these gaps in our annual action plan for this outcome and will set targets accordingly.
- The Local Authority will seek to benefit from Welsh Government's pilot project to incentivise Welsh speakers that return from universities to help teach Welsh in schools.
- Teaching staff within the Local Authority will be further encouraged to attend Welsh language courses run by Academi Hywel Teifi with an initial five-year programme of planning and development identified for this area. The focus will be in the large on staff in English-medium schools with minimal Welsh-language skills, but provision for those wishing to brush up or enhance their skills will also be made available across all schools.
- The Local Authority will identify/ recruit potential leaders and support them when completing the 'Aspiring Leaders' course with the intention of continuing to complete the NPQH.

- Increasing the number of staff attending the Welsh Language Sabbatical scheme will be a target. We will investigate using **pilot schools** with the aim of mapping out a continuum of staff training to be able to eventually create a category 2 stream within an English medium school, starting at nursery and working through to Year 6 over a number of years. Early discussions have identified areas suitable for a scheme of this kind within the Swansea Valley, along with 3 other pilots in the Neath/Baglan area (2 primary and 2 secondary schools). Information regarding the schools will be detailed in our mid-term plan and specific quantitative data and timescales will be set and evaluated in our annual action plans.
- Welsh language awareness training will be made available for all non-teaching staff in the Local Authority's schools.
- To fulfill the aspiration of opening three schools over the 10 year period we will need to ensure at least 3 headteachers, a senior team for each school, class teachers and assistants during the establishment and development of each school. As plans develop in line with member approval and the RLDP, we will calculate the data on the exact staffing numbers needed for the new Welsh-medium schools in line with the proposals. These will be included in the annual action plans.
- We will review the Welsh Government Workforce Development Plan and seek to mainstream recommendations at local level to maximize and grow a Welsh teaching and learning workforce.
- In order to achieve the targets for increasing the number of learners in Welsh-medium education, we will need a partnership approach to planning the workforce needs. We will look to work with relevant stakeholders and Welsh Government in order to achieve these ambitious targets. Annual action plans will reflect these collaborative actions and quantitative short term targets will be agreed upon by all relevant stakeholders.

#### Where do we expect to be at the end of our ten year Plan?

An increased number of the NPT education staff will be able to teach through the medium of Welsh and Welsh as a subject. There will be an increase in Welsh medium staff able to teach specific subjects at secondary level. There will be an increase in the number, ability and confidence of staff in English-medium schools able to converse and teach Welsh, therefore increasing the amount of learners with access to Welsh-medium education at all levels throughout the Local Authority. NPT will attract and recruit excellent, bilingual leaders for our schools. All NPT schools will form communities that promote the Welsh language as a medium for education and community life.

## How we will work with others to achieve our vision

The WESP sets out a requirement for each local authority to establish a Welsh Education Forum (WEF). The NPT WESP Forum comprises of headteacher representatives from Welsh-medium and English-medium primary and secondary schools, officers of the local authority and other stakeholders from our community including Menter Iaith, RhAG, Health, Mudiad Meithrin, Swansea University's Academi Hywel Teifi, Tŷ'r Gwrhyd and the Urdd.

The NPT WESP Forum met to offer its views during the initial planning of the document in July 2021. Following the initial meeting, working groups for each outcome, comprising of members of the forum, were formed. The working groups will meet termly to form and evaluate an action plan for their specific outcome. These action plans will be focused on achieving the overarching aims set out in the WESP document. Progress will be reported back to the full WESP forum on a termly basis.

## Neath Port Talbot WPGA Grant

**Funding for county councils to support the Welsh language in Carmarthenshire and the former industrial heartland areas of the Western Valleys**

**£147,500**

<b>Project/ Activity</b>	<b>Key milestones</b>	<b>Funding Allocation</b>
Commission consultant with knowledge of linguistic sensitive areas to work with the Local Authority to produce a short term and long term action plan for the Swansea and Amman Valley area	Short term and long term action plan produced. Actions from plan will be evaluated and good practice will be used in other areas within the Local Authority e.g. Dulais Valley, Afan Valley	£10,000
Employ Community Officer to facilitate the implementation of targets within the Swansea and Amman Valley Action Plan (in conjunction with the Welsh Language Promotion Strategy and the WESP). The Community Officer will work closely with partner organisations e.g. Menter Iaith, Early Years officers, Health, Youth Service etc. to deliver projects that will increase the use of the Welsh language within these communities. The Community Officer will also work closely with Carmarthenshire/ Powys to facilitate joint projects (specifically in bordering villages i.e. Gwaun Cae Gurwen, Brynamman, Cwmllynfell)	Increase in the number of Welsh-medium activities and events within the Swansea and Amman Valley areas. Increase in cross county collaborative activities and events within the Swansea and Amman Valley areas.	£45,000
Employ Welsh Language Coordinator to manage and supervise the associated officers and events, manage the financial element of the grant and evaluate progress	Targets are achieved and evaluated on a regular basis., financial spend is tracked to ensure value for money, good practice is recognised and share with the wider Local Authority	£22,000
Early Years/ Flying Start/ WESP officers to organise a Welsh Language and Culture Festival with the aim of promoting the benefits of Welsh-medium to the community as well as 'myth busting' common fears around Welsh language and Welsh-medium education. The Festival will be launched in the Swansea/ Amman Valley area with the aim of a local authority rollout in the future.	Accessible information and 'myth busting' for parents, families and the wider community will lead to an increase in families choosing Welsh-medium education and Welsh language courses.	£5,500

Neath Port Talbot Youth Service to create a Welsh-medium youth package for the Swansea/ Amman Valley areas where there are significant gaps in Welsh-medium provision. This will include employing a Welsh-medium youth officer to facilitate events.	Increase in the number of youth activities and events in the Swansea/ Amman valley areas where there are currently significant gaps in provision.	£20,000
Joint Welsh-medium activities/ projects with Menter Iaith to be developed and implemented in the Swansea/ Amman Valley area. Joint activities and projects to be developed with Carmarthenshire and Powys e.g. 'Hyder-ish'	Increase in the number of Welsh-medium activities/ projects/ events in the Swansea/ Amman valley areas where there are currently significant gaps in provision.	£15,000
Promotional campaign resources to include videos, vlogs, pamphlets, posters to be produced and shared	Easily accessible information for parents, families and the wider community will lead to an increase in families choosing Welsh-medium education and Welsh language courses.	£10,000
Projects and events as noted in the Welsh Language Promotion Strategy and the WESP specifically targeted at the Swansea/ Amman Valley e.g. work with local musicians to provide creative sessions for young people, homework help for parents, family activity sessions/ days e.g. fun days, singing sessions, social events for primary and secondary age children etc.	Increase in the number of Welsh-medium activities/ projects/ events in the Swansea/ Amman valley areas where there are currently significant gaps in provision. Targets in Welsh Language Promotion Strategy and the WESP achieved.	£10,000
Early Years/ Flying Start/ WESP officers will work in partnership with Midwifery and Health Visitors to assist early messages about the Welsh Language and bilingualism, to be shared though the perinatal and postnatal period. Information booklets providing information on the benefits of bilingualism and addressing common fears will be created and used by the partners from initial perinatal communication with parents.	Easily accessible information for parents, families and the wider community will lead to an increase in families choosing Welsh-medium education.	£10,000



## Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

### Version Control

Version	Author	Job title	Date
1	R.Crowhurst	Head of Service	2022
2	K Windsor- Brown	Transformation Coordinator	2023
3	K Windsor- Brown	Transformation Coordinator	2024

### 1. Details of the initiative

	<b>Title of the Initiative: Welsh in Education Strategic Plan</b>
	<b>Area: Transformation</b>
<b>1b</b>	<b>Directorate: ELLLS</b>
<b>1c</b>	<b>Summary of the initiative:</b> Plan for developing Welsh language across education settings
<b>1d</b>	<b>Who will be directly affected by this initiative?</b> Preschool, primary secondary and post 16 pupils
<b>1e</b>	<b>When and how were people consulted?</b> Consultation between November 2021 and January 2022
<b>1f</b>	<b>What were the outcomes of the consultation?</b> The plan received widespread support and approval

### 2. Evidence

**What evidence was used in assessing the initiative?**

The following evidence, information and data was used before and during the process of completing the WESP document. As a result, the WESP aligns itself to:

- The Well-being of Future Generations (Wales) Act 2015
- 'A Wales of Vibrant Culture and Thriving Welsh Language'
- Prosperity for All: the national strategy and the programme for Government, Taking Wales forward 2016-2021
- Welsh Government's national Welsh language strategy 'Cymraeg 2050: A million Welsh speakers by 2050'
- Education in Wales: Our National Mission, Action Plan 2017-21- A desire for learners to become increasingly bilingual and commitments to encourage teachers with some ability to speak Welsh to further develop their skills
- The Welsh in Education, Action Plan 2017-21- Sets the direction for the development of Welsh-medium education
- Neath Port Talbot Welsh Language Promotion Strategy

Further data was also collated from the NPT Childcare Sufficiency Assessment 2017, NPT Childcare CIW data 2021, NPT Local Development Plan, PLASC, 2011 Census, Family Information Service and a range of third-party partners including Mudiad Meithrin, Menter Iaith, Urdd and Academi Hywel Teifi.

**3. Equalities**

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	x			The proposal will have a positive impact on children and young people of all ages. As a result of the WESP, the Council is expected to improve Welsh medium and Welsh language education and increase the number of learners in Welsh medium education.

			<p>The outcomes reflect a learner’s education journey and are consistent with the policy areas of Cymraeg 2050 and Education in Wales: Our National Mission. They include:</p> <ul style="list-style-type: none"> <li>• Outcome 1: More nursery children/three-year-olds receive their education through the medium of Welsh</li> <li>• Outcome 2: More reception class children/five-year-olds receive their education through the medium of Welsh</li> <li>• Outcome 3: More children continue to improve their Welsh language skills when transferring from one stage of their statutory education to another (Foundation Phase to Key Stage 4)</li> <li>• Outcome 4: More learners study for assessed qualifications in Welsh (as a subject) and subjects through the medium of Welsh (Key Stage 3 and 4)</li> <li>• Outcome 5: More opportunities for learners to use Welsh in different contexts in school (Foundation Phase to Key Stage 4)</li> <li>• Outcome 6: An increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN) in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018 (Pre-school age to Key Stage 4)</li> <li>• Outcome 7: Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh (Pre-school age to Key Stage 4)</li> </ul> <p>In addition, there may be a positive impact on adults and older children if the Welsh language is learnt by younger children and spoken within the home setting.</p>
Disability	x		<p>As a result of the Additional Learning Needs and Educational Tribunal Act (Wales) 2018, significant changes are underway in relation to the statutory provision required to meet the needs of all learners with additional learning needs (ALN). All services</p>

			<p>within the local authority will be required to consider whether the child or young person needs ALP (Additional Learning Provision) in Welsh.</p> <p>Outcome 6 in the WESP is concerned with ensuring an increase in the provision of Welsh-medium education for pupils with ALN. Targets in this section includes providing support for teachers within Welsh-medium mainstream schools. This will enhance the Inclusive Learning Provision (ILP) and Additional learning Needs Provision (ALP) offer within Welsh- Medium schools and Early Years settings, as set out in the new ALN Code for Wales 2021.</p> <p>The Council's WESP outlines the aim to invest in a bilingual specialist provision and specialist staff within the local authority or with regional partners, to secure the capacity to deliver a Welsh medium specialist provision for children and young people with more complex additional learning needs.</p> <p>Consultation replies stated that specific Welsh-medium Additional Learning Needs provision was needed throughout the Local Authority to ensure equal access to ALN pupils in Welsh-medium education. The WESP has been amended accordingly with the inclusion of two Welsh-medium support centres to be established during the 10-year plan.</p>
Gender reassignment		x	This is not a criterion considered in terms of the Council's education arrangements either for pupils or school staff, however, it is expected that all NPTCBC schools meet the needs of pupils and staff who are transgender.
Marriage & civil partnership		x	This is not a criterion that will be impacted upon by this proposal
Pregnancy and maternity		x	This is not a criterion that will be impacted upon by this proposal
Race	x		It is evident from WM school data that families from different ethnic backgrounds choose WM education, with many English families moving to the area and making the informed decision to educate their children in WM schools. Both the WESP and the Neath Port Talbot Welsh Language Strategy aim to inform and support these families when making the decision about choosing WM education. These aims

			<p>significantly alleviate concerns and it is anticipated that this will lead to an increase in the number of pupils from ethnic backgrounds attending WM education.</p> <p>As part of the outcomes of the WESP there should be a promotion of increasing Welsh language across all ethnic groups, supported by the provision of Welsh language immersion centres across the local authority area.</p>
Religion or belief		x	<p>This is not a criterion that will be impacted upon by this proposal, however, it is expected that the Council's educational arrangements across Welsh-medium and English-medium schools will meet the needs of pupils or staff members of different religions or with different beliefs.</p>
Sex	x		<p>Outcomes in the WESP aim to provide a plethora of opportunities for both boys and girls to develop and use Welsh outside of the classroom through cultural and sporting activities within school and in the wider community. These opportunities ensure that learners, both boys and girls, have access to the Welsh language both formally and informally, which could lead to an increase in the use of Welsh in the wider community.</p> <p>Transition data shows that there is no clear year on year trend of a specific sex transitioning from Welsh-medium Key Stage 2 education to English- medium education at Key Stage 3. Annual data shows a fluctuation of both sexes from a minority of schools transitioning to English-medium secondary education. This has been addressed in Outcome 3 with specific targets set for retaining all pupils within Welsh-medium education from one key stage to the next.</p>
Sexual orientation		x	<p>This is not a criterion that will be impacted upon by this proposal</p>

**What action will be taken to improve positive or mitigate negative impacts?**

**To improve positive impacts\_**

- The Council has produced a Welsh in Education Strategic Plan document for 2022-2032, this document sets out all actions that will be taken to improve Welsh language outcomes in education and should be read in conjunction with this IIA.
- The WESP forum will monitor transition rates for pupils choosing to be educated through the medium of Welsh and will also monitor the Welsh in Education Strategic Plan document over a ten-year period (2022-2032) and mitigate any negative impacts by amending the Strategic Plan.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

<b>Public Sector Equality Duty (PSED)</b>	<b>+</b>	<b>-</b>	<b>+/-</b>	<b>Why will it have this impact?</b>
To eliminate discrimination, harassment, and victimisation	x			As part of the WESP outcomes there should be a promotion of increasing Welsh language across all community groups, supported by the provision of Welsh language immersion centres across the local authority area. This provides opportunities across all communities and promotes the elimination of discrimination, harassment, and victimisation.
To advance equality of opportunity between different groups	x			The WESP aims to develop and expand the opportunities for using the Welsh language across all community groups. Additional information can be found in the outcomes of the WESP document.
To foster good relations between different groups	x			Opportunities are present in the WESP to ensure that groups work together to promote and develop the Welsh language, for example Welsh-medium schools supporting English –medium schools to further develop pupil and staff Welsh language skills.

**What action will be taken to improve positive or mitigate negative impacts?**

The WESP document is a 10 year plan with seven outcomes, each containing actions. This document will be monitored by both Members and the WESP forum.

**4. Community Cohesion/Social Exclusion/Poverty**

	+	-	+/-	Why will it have this impact?
Community Cohesion	x			The WESP aims to promote community cohesion by creating opportunities to work together towards a common aim, developing the Welsh language. Specific actions within the WESP promote community cohesion, for example, Menter Iaith's family activity sessions/ days e.g. fun days, singing sessions; The Urdd's Community Department providing arts opportunities and arranging activities to encourage and enable children and young people to socialise through the medium of Welsh outside the classroom; further development of Ty'r Gwrhyd's community groups, including Merched y Wawr, Cylch Darllen Cwm Tawe and papur bro <i>Llais</i> , and activities including regular book launches, small art exhibitions, cultural and literary events and creative activities for children and young people. These activities aim to forge good relationships between Welsh-medium and English-medium communities.
Social Exclusion	x			There could be a positive effect on social exclusion through reaching the targets as stated in the WESP document, coupled with Welsh Government's desire for additional Welsh speakers across communities in Wales.

Poverty			x	No impact on poverty because of the WESP has been identified.
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**What action will be taken to improve positive or mitigate negative impacts?**

The WESP document is a 10 year plan with seven outcomes, each containing actions. This document will be monitored by the Members, Welsh Government and the WESP forum.

**5. Welsh**

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language	x			<p>The WESP overarching ten year target in Neath Port Talbot is to increase the number of Year 1 children taught through the medium of Welsh from 16.8% (252 pupils) in 2020/21 (PLASC 2021) to 31% (460 pupils) by 2032. Outcome 5 in the WESP seeks to provide more opportunities for learners to use Welsh in different contexts in school.</p> <p>The targets for this outcome have been developed alongside the targets set out in the Neath Port Talbot Welsh Language Strategy (alongside Priority 1) with emphasis on promoting and facilitating the use of the Welsh language and increase its use in everyday life within schools and also within the wider community.</p> <p>It also aims to promote the Curriculum for Wales Framework by ensuring that All learners should have appropriate pathways for learning Welsh and English to enable them to develop the confidence to use both languages in everyday life. It aims to</p>



			<p>support learners to use Welsh confidently and appreciate its usefulness to communication in a bilingual Wales.</p> <p>The Authority recognises that having varied opportunities to use the Welsh language in different contexts within the school environment is key to promoting confidence. Learners, parents and carers will need to be supported and encouraged to participate in a variety of experiences and opportunities through the medium of Welsh in order to improve their confidence in the language.</p> <p>The WESP therefore should impact positively on people’s opportunities to use the Welsh language.</p>
<p>– treating the Welsh and English languages equally</p>	<p>x</p>		<p>The WESP includes the aim to create and provide opportunities and experiences for all learners and the wider community to use Welsh and be part of Welsh life in order to increase confidence in the Welsh language and to feel a sense of belonging.</p> <p>By September 2022, all Welsh and English medium schools have reviewed and revisited previous Siarter Iaith/ Cymraeg Campus targets and will achieve the pre Covid standards.</p> <p>By September 2024, the Siarter Iaith/ Cymraeg Campus will be an integral part of planning for the Curriculum for Wales within all schools, with an emphasis on a whole school progression approach (supported by our Welsh in Education officer and Curriculum Development Officer (Welsh in English medium)). This will increase learner and staff confidence in using the Welsh language and impact positively on the ethos of all schools.</p> <p>Siarter Iaith/ Cymraeg Campus action plans/strategies are used to ensure regular opportunities for learners, staff and the wider community to engage in activities that increase confidence in the Welsh language and promote Welsh modern culture and history. This will lead to an increased awareness of the relevance/ importance of Welsh in their everyday lives. This will be monitored and supported by our Welsh in Education officer and Curriculum Development Officer (Welsh in English medium).</p>

				The WESP therefore should impact positively on treating the Welsh language no less favourably than English.
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**What action will be taken to improve positive or mitigate negative impacts?**

The WESP document is a 10 year plan with seven outcomes, each containing actions. This document will be monitored by Members, Welsh Government and the WESP forum.

**6. Biodiversity**

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

<b>Biodiversity Duty</b>	<b>+</b>	<b>-</b>	<b>+/-</b>	<b>Why will it have this impact?</b>
To maintain and enhance biodiversity			X	This is not a criterion that will be impacted upon by this proposal
To promote the resilience of ecosystems, i.e. supporting protection of the wider			X	This is not a criterion that will be impacted upon by this proposal

environment, such as air quality, flood alleviation, etc.				
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**What action will be taken to improve positive or mitigate negative impacts?**

## 7. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. <b>Long term</b> – looking at least 10 years (and up to 25 years) ahead	The WESP is expected to positively impact on pupils aged 3-18 and on older children and adults, and will aim to will improve wellbeing through the promotion of the development of the Welsh language leading to increased opportunities to participate in the language and culture of Wales
ii. <b>Prevention</b> – preventing problems occurring or getting worse	The WESP directly supports wellbeing objective 1 – ‘to improve the wellbeing of children and young people’ through the provision of enhanced opportunities and provision for current and future generations of primary aged pupils. It also supports wellbeing objective 2 –‘to improve the wellbeing of all adults who live in the county borough’ and wellbeing objective 3 ‘to develop the local economy and environment so that the wellbeing of people can be improved’, particularly through WESP Outcomes 5 and 7.

iii. <b>Collaboration</b> – working with other services internal or external	The WESP is always developed in consultation with both internal and external Welsh language groups and communities. The WESP forum comprises Neath Port Talbot officers and school and early years representatives, along with a number of external groups and organisations who have collectively developed actions within the WESP.
iv. <b>Involvement</b> – involving people, ensuring they reflect the diversity of the population	As above, a range of stakeholders have been actively involved in developing the WESP. The WESP has been subject to a comprehensive public consultation with a wide range of stakeholders for a nine week period between 5 <sup>th</sup> November 2021 and 7 <sup>th</sup> January 2022.  Based on the statutory requirements set out in the Welsh in Education Strategic Planning regulations (Wales) 2019 (“ <i>the 2019 Regulations</i> ”) local authorities must consult with a range of stakeholders.
v. <b>Integration</b> – making connections to maximise contribution to:	Welsh-medium education is an integral and essential part of the learning offer in Neath Port Talbot and all children should benefit from the opportunity to learn, appreciate and understand their lives through the medium of Welsh. This principle is underpinned by ensuring universal access to this provision across the county borough. Neath Port Talbot Council recognises that language and culture are critical parts of an individual's identity and is committed to promoting and celebrating Welsh language learning across all phases and sectors. The WESP aims to provide greater opportunities to enable all learners to develop their Welsh language skills and to use the language confidently in everyday life.
<b>Council’s well-being objectives</b>	The WESP directly contributes to wellbeing objective 1 – ‘all children have the best start in life and also supports wellbeing objective 2 –‘all our communities will be thriving and sustainable’ and wellbeing objective 3 - ‘Our local environment, culture and heritage can be enjoyed by future generations’,
<b>Other public bodies objectives</b>	The strategy supports and complements the Public Services Board’s wellbeing objectives

## 8. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

Progress of the plan will be monitored by WESP forum members and annually by elected members and Welsh Government

## 9. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
<b>Equalities</b>	Positive impacts in relation to age, disability, race and sex; neutral impacts on all others. The WESP is a 10 year plan and will continue to be monitored during that period for any mitigating actions where necessary including changes to the strategic plan.
<b>Community Cohesion/ Social Exclusion/Poverty</b>	Positive impact
<b>Welsh</b>	Positive impacts
<b>Biodiversity</b>	No Impact
<b>Well-being of Future Generations</b>	Positive impact

## Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised x
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

Implementing the WESP will result in positive impacts on most protected groups and on the development of the Welsh language. It will also ensure compliance with the requirements imposed upon the council by Section 84 of the School Standards and Organisation (Wales) Act 2013 and the WESP (Wales) Regulations 2019.

### 10. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Monitoring the outcomes in the WESP	Members, Welsh Government and the WESP forum	Annually over the 10 year plan	Targets set in the strategic plan are achieved

### 11. Sign off

Version 1	Name	Position	Signature	Date
Completed by	Rhiannon Crowhurst	Head of Service		2022
Signed off by	Andrew Thomas	Director		2022

<b>Version 2</b>	<b>Name</b>	<b>Position</b>	<b>Signature</b>	<b>Date</b>
<b>Completed by</b>	<b>Kate Windsor-Brown</b>	<b>Head of Service</b>		<b>2023</b>
<b>Signed off by</b>	<b>Andrew Thomas</b>	<b>Director</b>		<b>2023</b>

<b>Version 3</b>	<b>Name</b>	<b>Position</b>	<b>Signature</b>	<b>Date</b>
<b>Completed by</b>	<b>Kate Windsor-Brown</b>	<b>Head of Service</b>		<b>2024</b>
<b>Signed off by</b>	<b>Andrew Thomas</b>	<b>Director</b>		<b>2024</b>

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**NEATH PORT TALBOT COUNTY BOROUGH COUNCIL**

**Cabinet**

**2<sup>nd</sup> October 2024**

**REPORT OF HEAD OF SUPPORT SERVICES AND  
TRANSFORMATION  
RHIANNON CROWHURST**

**MATTER FOR DECISION**

**WARDS AFFECTED: All**

**STRATEGIC SCHOOL IMPROVEMENT PROGRAMME-  
PROPOSAL TO CLOSE THE LEARNING SUPPORT  
CENTRE FOR PUPILS WITH SPECIFIC LITERACY  
DIFFICULTIES AT CWMTAWE COMMUNITY SCHOOL**

**Purpose of report**

1. To obtain approval to consult on the proposed closure of the specialist learning support centre (LSC) provision for secondary age pupils with Specific Literacy Difficulties (SpLD) at Cwmtawe Community School, with effect from 1<sup>st</sup> September 2025.

**Executive summary**

2. The Council is responsible for ensuring suitable provision is made for pupils with Additional Learning Needs (ALN). Achieving this will involve reviewing the number and type of schools the Council has in its area and assessing whether or not best use is being made of resources and facilities.

3. Recent work on reviewing the number and type of planned places and assessment provision across Neath Port Talbot has indicated that at primary level, the greatest area of need and therefore demand on specialist provision for the next 3 years remains in relation to Autism Spectrum Disorder (ASD), in addition to Severe and Profound Multiple Learning Difficulties (SLD/ PMLD). At secondary level, the greatest area of need and therefore demand on specialist provision for the next 3 years is also in relation to ASD, Moderate Learning Difficulties (MLD) and Social Emotional and Behavioural Difficulties (SEBD).
4. Approval is sought to consult on a proposal to close the specialist learning support centre (LSC) provision for secondary age pupils with SpLD at Cwmtawe Community School and provide education for pupils with SpLD at their catchment mainstream secondary school.
5. There are no specialist LSCs for pupils with SpLD at primary level in Neath Port Talbot and instead learners who are experiencing literacy difficulties are well supported through good high quality learning, differentiation and where appropriate, Additional Learning Provision (ALP) delivered through Individual Development Plans (IDP). The proposal seeks to replicate this model at secondary level.

## **Background**

6. The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. Having the right schools in the right place and ensuring that they are fit for the 21<sup>st</sup> century learner is the challenge facing the Council. Achieving this will involve reviewing the number and type of schools the Council has in its area and assessing whether or not best use is being made of resources and facilities. This will include ensuring suitable provision for those pupils with special educational needs/additional learning needs.

7. Implementing the Strategic School Improvement Programme (SSIP) involves reviewing existing provision and determining the number and type of schools needed to deliver education effectively and efficiently across the County Borough. It will most likely lead to substantial change involving opening new schools, closing existing schools, merging or amalgamating schools, federating schools and promoting new initiatives that support collaborative working between schools. It will also involve re-organising education provision to ensure pupils gain access to and benefit from the specialist support, skills and expertise available within the County Borough.
8. The Council has decided to review its provision on the basis of:
  - the need for places and the accessibility of schools
  - educational standards
  - the quality and suitability of school accommodation
  - effective financial management
9. The Council provides for the pupils of Neath Port Talbot who require specialist support for their educational needs at two community special schools and at learning support/ inclusion centres attached to community primary/secondary schools.
10. Within Neath Port Talbot, there are currently 761 planned places across Learning Support Centres and Special Schools. This includes: 19 LSCs which offer 281 planned places for primary aged pupils with a range of Additional Learning Needs. 8 LSCs at secondary level, which offer 163 funded planned places. These Learning Support Centres offer specialist placements for children and young people with needs including Autism Spectrum Disorder; Social, Emotional and Behavioural Difficulties; Speech, Language and Communication; Hearing Impairment and Moderate / Severe / Profound Learning Difficulties. Education is also provided for pupils in 2 special schools (Ysgol Maes y Coed and Ysgol Hendrefelin), catering for the needs of children and young people with the most complex ALN.

11. Through a robust tracking and monitoring system, Local Authority data indicates that at primary level, the greatest area of need and therefore demand on specialist provision for the next 3 years remains in relation to ASD, in addition to Severe and Profound Multiple Learning Difficulties (SLD/ PMLD). At secondary level, the greatest area of need and therefore demand on specialist provision for the next 3 years remains in relation to ASD, Moderate Learning Difficulties (MLD) and Social Emotional and Behavioural Difficulties (SEBD).
12. In response to ASD need, additional pupil places have been provided within the last 5 years at primary age in Waunceirch Primary School and Blaenhonddan Primary School, and at secondary age in Dŵr y Felin Comprehensive. 12 additional planned places for pupils with SLD / MLD have also been created within Ysgol Hendrefelin Special School and The Strategic Outline Case (SOC) in respect of the Ysgol Maes y Coed Special School Project has been approved by the Cabinet Secretary for Education and can now progress to the Outline Business Case (OBC) stage to create additional capacity at Ysgol Maes Y Coed for pupils with PMLD.

### **The Proposal**

13. It is proposed to close the LSC for pupils with SpLD at Cwmtawe Community School with effect from 1<sup>st</sup> September 2025.
14. Neath Port Talbot Council are committed to promoting high standards of literacy for all children and young people. All learners should have access to high-quality, well-differentiated 'quality first' teaching across the curriculum within our mainstream schools and settings, as informed by current research and national guidance.
15. It is recognised that some children and young people find learning to read and write far more challenging than others, despite high quality opportunities and input. Research highlights the importance of

identifying the needs of these individuals early and ensuring that they access a differentiated curriculum to make suitable progress, aligning with national policy and good practice for children and young people with Additional Learning Needs (ALN Code of Practice, 2021 para 20.10).

16. Early assessment and intervention are regarded as not only essential to addressing literacy difficulties, but also as vital to preventing the emotional distress and disengagement from learning that can arise as a result of these barriers to learning. Mainstream schools are best placed to identify and meet the needs of learners with literacy difficulties within a 'literacy-friendly', inclusive environment that promotes children's rights. A focus on quality first teaching, alongside regular whole staff development is essential, as is working in partnership with parents and carers.
17. Through the successful implementation of IDPs, schools are increasingly supporting young people with a range of additional specific learning needs including SpLD. There are currently 10 pupils with SpLD across all Neath Port Talbot who hold a Local Authority Maintained IDP. All are educated and supported within mainstream schools, ensuring they are fully integrated and have equal access to all aspects of mainstream activities and opportunities.
18. The Learning Needs Code for Wales also states:  
*"The Welsh Government considers that an inclusive education, where all pupils access common opportunities in ways relevant to their needs, and which ensures that they fully belong to the school community, is of benefit to all... The ALN system relies on the knowledge and experience of teaching staff to identify ways of providing appropriate access to the curriculum for every child and young person. Meeting the needs of learners with ALN ought to be part of a whole school or institution approach to school or institution improvement. The key to this lies in the teaching staff's knowledge of each child and young person's skills and abilities. Consequently, improvements in the teaching and learning of children and young*

*people with ALN cannot be isolated from improvements in the teaching and learning for children and young people across a school or FEI as a whole.”*

19. At present, there are 0 pupils at the Learning Support Centre for pupils with SpLD at Cwmtawe Community School. Additionally, no teachers or support staff are currently employed within the Learning Support Centre.
20. Maintaining a provision with no pupils is not considered to be best use of Council resources, and as such it is proposed that the LSC provision for SpLD should close.

### **Cwmtawe Community School**

21. Cwmtawe Community School is a 11-16 Secondary School for boys and girls, situated in Pontardawe in the Swansea Valley.
22. Currently, the school has the capacity to accommodate 1284 full-time pupils. As of PLASC 2024, there are 1115 full time pupils at the school. The school also hosts a specialist ASD LSC provision for 13 places and a SpLD LSC provision for 12 places.
23. Closing the Cwmtawe Community School LSC for pupils with SpLD will have no detrimental effect on the school's full time pupil capacity.
24. The school was last inspected by Estyn in 2018, and current performance was judged to be excellent and good in all areas. It is reported that 'High aspirations for all pupils are at the heart of the work of Cwmtawe Community School. Most pupils display a positive work ethic and are committed to achieving their potential. They make strong progress in their knowledge, communication and skills and achieve high academic standards.'  
(Estyn 2018)
25. Cwmtawe Community School has a good track record for wellbeing and attitudes towards learning. Estyn report that, 'Most pupils

display positive attitudes to their learning. They are well prepared and settle quickly in lessons, ready to work. Many respond enthusiastically to the teaching and are eager to ask and answer questions. They have a positive work ethic, are highly motivated and sustain their concentration well during tasks.'

26. Estyn also report that: 'The school is a caring and inclusive community, which promotes a culture of high expectations and care for others. The school's mission statement of 'We can, and we will succeed by working together and giving of our best' has a positive effect on pupils' behaviour, wellbeing and academic progress'.
27. The Estyn report also notes that, 'The headteacher and senior leadership team work together successfully to communicate a clear vision based on a culture of high expectations for all pupils. As a result, staff have a strong commitment to 'develop young people to live life to the full and become responsible adults who contribute positively to society'.

### **Quality of school building and accommodation**

28. According to the condition survey carried out in 2015, overall, the school is graded category C for condition. The backlog maintenance for this site is estimated at circa £1,155,822. This figure represents the total cost of all maintenance work identified as being required at the school.
29. There are no capital works planned as a result of this proposal.

### **Consultation**

30. This school organisation proposal is being brought forward under the Council's Strategic School Improvement Programme. Formal consultation is required in line with the Welsh Government's School Organisation Code, November 2018, which specifies the procedures to be followed, including the content of the consultation document and those to be consulted.

31. Subject to approval, it is intended to consult on this proposal between 5<sup>th</sup> November and 16<sup>th</sup> December 2024. Responses to the consultation will be reported to Cabinet for consideration by Members.

### **Impact on pupils**

32. It is anticipated that the proposed changes will have no adverse impact on pupils. The last 5 years has seen a decline in the number of pupils attending Cwmtawe Community School Learning Support Centre for pupils with SpLD. In September 2024, there will be 0 pupils attending the centre. Therefore, the proposal to close the centre will not impact on the pupils currently attending Cwmtawe Community School.
33. For pupils within the Local Authority in receipt of an IDP for SpLD, support is provided in mainstream establishments in line with individual pupil IDPs and forms part of a continuum of support in accordance with the Additional Learning Needs and Education (Wales) Tribunal Act. The Act specifies that mainstream schools have a duty to deliver additional learning provisions (ALP) to support learners with ALN as set out in their IDP.
34. Children and young people with SpLD receive support from specialist staff at different levels, including; consultation for individuals and groups of learners; individual casework and systemic work such as delivering high quality training. Furthermore, Neath Port Talbot Inclusion Service have an agreed SpLD pathway that clearly sets out the graduated response and when it is appropriate to involve relevant professionals. The Inclusion Service will also continue to build the knowledge and capacity of schools to identify needs at an early stage and deliver appropriate support through the delivery of professional training.
35. This proposal also ensures that pupils with SpLD have the opportunity to be taught within their catchment schools alongside their peers, thus reducing the need for additional travel to a LSC. The emotional well-being of children and young people experiencing SpLD is a priority when promoting more positive outcomes for this



group. Within Neath Port Talbot, we are committed to promoting the rights of children and young people. With reference to Article 31 of the United Nations Convention on Rights of a Child (UNRC), it is also very important to ensure a balanced approach in which the child or young person has planned opportunities to relax, play and develop a range of other skills (which they may acquire with greater ease than literacy skills) to support their emotional well-being. Provision to support the confidence and emotional well-being of learners with literacy needs is key and mainstream settings can develop this by ensuring that the children and young people feel part of a learning community which recognises and responds to their needs. Learners should have a strong sense of belonging in their local mainstream school, in which a sense of belonging is a core element of embedding a whole school approach to emotional and mental well-being.

36. There will be no negative impact on pupils attending Cwmtawe Community School as a result of this proposal. Additionally providing targeted support in line with individual pupil IDPs within all mainstream secondary schools in the Local Authority ensures that pupils with SpLD have the opportunity to be taught within their catchment schools, thus reducing the need for additional travel to a LSC and increasing the potential to use well-established walking and cycling routes to school for some pupils.
37. Under the School Travel Plan requirements, all schools, together with the Council's Road Safety Team, are committed to:
  - improving road safety within the local community
  - raising awareness about travel issues
  - encouraging walking, cycling and public transport for the school journey where applicable
  - encouraging independent travel where applicable

### **Impact on additional learning needs provision**

38. Specialist support for pupils with SpLD will be provided in all mainstream establishments including Welsh-medium schools in line with individual pupil IDPs and will form part of a continuum of support in line with ALN Reform. The language medium of ALN provision is integral to the effectiveness and quality of the provision

itself. Passing the Additional Learning Needs and Education Tribunal (Wales) Act 2018 (the Act) was a turning point in this context and established the principle that the ALN system in Wales needs to be bilingual, and therefore Welsh-medium provision is equitable to the English-medium provision.

39. In line with the Additional Learning Needs Code for Wales, mainstream schools have a duty to deliver additional learning provisions (ALP) to support learners with ALN as set out in their IDP. This will ensure that pupils with SpLD are fully integrated and will have equal access to all aspects of mainstream activities and opportunities in the language of their choice.

### **Financial Impacts**

40. Cwmtawe Community School LSC is funded from the delegated schools budget and the school receives funding for additional places at Band E. In 2023-2024, the school received an additional £17,176 for the one Year 11 pupil attending.
41. The proposal seeks to close the LSC and therefore the school budget would be adjusted accordingly.
42. Should the proposal be approved, the funding will be repurposed to provide additional provision in areas where we have identified the greatest need.
43. There are no capital receipts directly related to this proposal.

### **Integrated Impact Assessment**

44. An Integrated Impact Assessment has been undertaken to assist the Council in discharging its legislative duties under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

45. The assessment has indicated that should the proposal proceed it is likely to have a positive impact on age, disability and sex, and neutral on race, religion or belief and sexual orientation, gender reassignment, marriage and civil partnership and pregnancy and maternity. The proposal may also impact positively on opportunities to use the Welsh language. The proposal will have both neutral and positive impacts on socio economic disadvantage. It is unlikely that the proposal would impact on biodiversity.
46. Following full consultation where views of all stakeholders will be gathered, greater information will be available which will further help to inform the full assessment.

### **Valleys Communities Impacts**

47. The impact on Neath Port Talbot's valley communities will be the same as all other areas of the County Borough as the provision admits pupils from across the whole of the county borough. Currently, there are no pupils attending the centre. Provision for pupils with SpLD will continue to be provided in all mainstream secondary schools throughout the Local Authority.

### **Workforce impacts**

48. Currently there are no additional staff employed at Cwmtawe Community School Learning Support Centre for pupils with SpLD. As a result, staff will not be adversely affected by this proposal.

### **Legal impacts**

49. The proposal will close an ALN provision in a mainstream school (Cwmtawe Community School) where the pupils admitted are in addition to the admission number for the school and where the provision is recognised by the Council as reserved for pupils with ALN. As such, this constitutes a regulated alteration requiring the statutory publication of the proposal. The School Standards & Organisation (Wales) Act 2013 (the Act) provides the legislative framework by which the Council may implement a proposal. The Welsh Government's School Organisation Code, November 2018,

made under Sections 38 and 39 of the Act, imposes on the Council requirements and guidelines on matters relating to school organisation. The Council's procedures are in line with legislative requirements.

## **Risk management**

50. A risk assessment has been carried out under the Council's Risk Management Policy 2015.

51. Potential risk areas in implementing the proposal include:

- educational outcomes for pupils are not improved
- negative response from parents
- discrimination against protected characteristics resulting in a negative impact on one or more protected groups
- staff with appropriate skills and expertise not available in all schools

52. Failing to implement the proposal will result in a range of teaching/learning and financial benefits not being fully realised, particularly in relation to:

- pupils with SpLD are not fully integrated and will not have equal access to all aspects of mainstream activities and opportunities within their catchment/ community school
- Increased financial pressure through funding planned places which are no longer required

53. Given that there are no pupils currently attending the centre and that the needs of pupils with IDPs for SpLD are currently met at mainstream schools within the Local Authority, and that high quality support is available from specialist local authority staff to ensure SpLD pupils are able to fully access mainstream education, the potential effects of the identified risks will be mitigated by implementation of the proposal.

## **Impact on community usage**

54. The proposal should have no adverse impact on the communities at Cwmtawe Community School or at other mainstream schools where SpLD pupils are attending, as the proposal does not affect any community usage.

## **Scrutiny Observations**

55. The item was considered at the Education, Skills and Wellbeing Scrutiny Committee on the 12th September. Members noted that should the proposal be progressed then opportunities would be available to develop provision for ALN where the greatest need has been identified. The report was noted.

## **Recommendation**

56. Having given due regard to the integrated impact and risk assessments, it is recommended that, in line with Section 48 of the School Standards and Organisation (Wales) Act 2013, Members approve consultation on a proposal to close the specialist learning support centre provision for secondary age pupils with SpLD at Cwmtawe Community School.

## **Reasons for proposed decision**

57. This decision is necessary to comply with the formal consultation requirements imposed on the Council by the School Organisation Code. Subject to the outcome of consultation, implementation of the proposal will enable the Council to promote high educational standards and the fulfilment of every child's potential. It will also enable the Council to meet its duty to ensure that resources are utilised effectively in line with the need for specialist places within the County Borough.

## **Implementation of the decision**

58. The decision is proposed for implementation after the three-day call-in period.

## **Appendices**

Appendix A: Integrated Impact Assessment

### **List of background papers**

- a) Strategic School Improvement Programme Principles Paper:  
September 2008  
[https://democracy.npt.gov.uk/Data/Cabinet/20080924/Agenda/\\$CAB-240908-REP-EL-KN.doc.pdf](https://democracy.npt.gov.uk/Data/Cabinet/20080924/Agenda/$CAB-240908-REP-EL-KN.doc.pdf)
  
- b) Welsh Government - School Organisation Code: November 2018  
<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>
  
- c) School Standards & Organisation (Wales) Act 2013  
[http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw\\_20130001\\_en.pdf](http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw_20130001_en.pdf)
  
- d) Additional Learning Needs and Education (Wales) Tribunal Act  
[Additional Learning Needs and Education Tribunal \(Wales\) Act 2018 \(legislation.gov.uk\)](http://www.legislation.gov.uk/ukpga/2018/12/pdfs/ukpga_20180012_en.pdf)
  
- e) Learner Travel (Wales) Measure: 2008 & the Learner Travel Statutory Provision and Operational Guidance: 2014  
[http://www.legislation.gov.uk/mwa/2008/2/pdfs/mwa\\_20080002\\_en.pdf](http://www.legislation.gov.uk/mwa/2008/2/pdfs/mwa_20080002_en.pdf)  
[Microsoft Word - Contents page - Learner Travel Statutory Provision and Operational Guidance.docx \(gov.wales\)](#)
  
- f) Home to School Travel Policy  
[npt\\_home\\_to\\_school\\_travel\\_policy\\_2017.pdf](https://www.npt.gov.uk/~/media/Assets/Policy%20Documents/2017/2017_Home_to_School_Travel_Policy.pdf)
  
- g) ALN Code of Practice 2021  
[The Additional Learning Needs Code for Wales 2021 \(gov.wales\)](https://gov.wales/sites/default/files/publications/2021-03/2021-03-26-ALN-Code-of-Practice-2021.pdf)



## Appendix A: Integrated Impact Assessment

### Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

#### Version Control

Version	Author	Job title	Date
e.g. Version 1	Kate Windsor-Brown	Transformation Coordinator	28/08/24

#### 1. Details of the initiative

	<b>Title of the Initiative:</b> PROPOSAL TO CLOSE THE LEARNING SUPPORT CENTRE FOR PUPILS WITH SPECIFIC LITERACY DIFFICULTIES AT CWMTAWE COMMUNITY SCHOOL
<b>1a</b>	<b>Service Area:</b> Strategic School Improvement Programme
<b>1</b>	<b>Directorate:</b> ELLL
<b>1</b>	<b>Summary of the initiative:</b> Closure of specialist provision for pupils with Specific Literacy Difficulties (SpLD) at Cwmtawe Community School
<b>1</b>	<b>Is this a 'strategic decision'?</b>



	Yes- forming part of the Council's SSIP plan to ensure that resources are utilised effectively in line with the need for specialist places within the County Borough
<b>1</b>	<b>Who will be directly affected by this initiative?</b> Service Users, staff, and members of the community.
<b>1</b>	<b>When and how were people consulted?</b> Informal consultation has taken place with colleagues across the education directorate and involved schools. Formal consultation will take place in Autumn 2024 Consultation will be undertaken at a formative stage and will allow for intelligent consideration and response. The consultation period will be 6 weeks to allow consultees time to consider the proposal and submit comments. A consultation document will be published on Neath Port Talbot Council website and sent directly to relevant consultees. Hard copies will be available on request. The consultation document will invite views and opinions to be submitted in respect of the proposal. The Welsh Government's School Organisation Code requires the Council to consult on its proposal and to publish a consultation report summarising any issues raised by consultees, the Council's response to those issues and Estyn's view of the overall merit of the proposal.
<b>1</b>	<b>What were the outcomes of the consultation?</b> Information to be provided following consultation period and IIA to be updated at this stage

## 2. Evidence

<b>What evidence was used in assessing the initiative?</b>
<p>A great deal of information is available with relation to the population within Neath Port Talbot. This can be accessed from the following sources.</p> <ul style="list-style-type: none"> <li>• Equality Act 2010</li> <li>• Welsh Language Standards (No.1) Regulations 2015</li> <li>• Well-being of Future Generations (Wales) Act 2015</li> <li>• Environment (Wales) Act 2016</li> </ul>

- NPT WESP 2022-2032
- Consultation Report
- Welsh Index of Multiple Deprivation (WIMD)
- School Organisation Code, 2018
- Pupil Level Annual School Census (PLASC) data has also been used along with the Local Authority data relating to school staff

Recent work on reviewing the number and type of planned places and assessment provision across Neath Port Talbot has indicated that there is a need for extra places in the areas of Autistic Spectrum Disorder (ASD), Speech and Language Difficulties (SLD), Social, Emotional and Behavioural Difficulties (SEBD) and Profound and Multiple Learning Difficulties (PMLD). This work has also been used to assess the impact of the proposal.

Following formal consultation, a Consultation Report will be prepared summarising the comments received and officer responses. Comments received will be considered and where appropriate will form part of the ongoing impact assessment. The report should be read alongside this impact assessment.

Respondents to the consultation will also be asked to complete an Equalities Monitoring form included in the consultation document and any highlighted impacts will also be carefully considered.

### 3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+	Why will it have this impact?
Age	x			The Equality Duty covers the protected characteristic of age, which refers to a person having a particular age or being within an age group.

			<p>This proposal seeks to close a specialist learning support centre for secondary aged children with SpLD. Current data indicates that there are currently 0 pupils attending the LSC in Cwmtawe Community School (PLASC 2023). Therefore closure of the LSC will have no direct negative impact on any pupils or staff at the school.</p> <p>Pupils with SpLD will benefit from attending their catchment secondary school with their peers from their primary years and will also benefit from the opportunity to experience a full mainstream curriculum.</p> <p>Neath Port Talbot council are committed to promoting high standards of literacy for all children and young people. All learners should have access to high-quality, well-differentiated ‘quality first’ teaching across the curriculum within our mainstream schools and settings, as informed by current research and national guidance. Research highlights the importance of identifying the needs of these individuals early and ensuring that they access a differentiated curriculum to make suitable progress, aligning with national policy and good practice for children and young people with Additional Learning Needs (ALN Code of Practice, 2021 para 20.10).</p> <p>Early assessment and intervention is regarded as not only essential to addressing literacy difficulties, but also as vital to preventing the emotional distress and disengagement from learning that can arise as a result of these barriers to learning. Schools are best placed to identify and meet the needs of learners with literacy difficulties within a ‘literacy-friendly’, inclusive environment that promotes children’s rights. A focus on quality first teaching, alongside regular whole staff development is essential, as is working in partnership with parents and carers.</p> <p>The implementation of this proposal therefore should have a positive impact on all pupils with SpLD and also on other pupils who will also benefit from differentiated teaching and learning approaches.</p>
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			It is therefore expected that this proposal will have an overall positive impact on this aspect.
Disability	x		<p>The Council's arrangements for education across the county borough include those children and young people with a disability.</p> <p>This proposal seeks to close a specialist learning support centre for secondary aged children with SpLD. Data indicates that there are 10 pupils with SpLD across all Neath Port Talbot who hold a Local Authority Maintained IDP. All are educated and supported within mainstream schools, ensuring they are fully integrated and have equal access to all aspects of mainstream activities and opportunities, therefore closure of the LSC will have no direct negative impact on any pupils with SpLD.</p> <p>Within Neath Port Talbot, there are currently 761 planned places across Learning Support Centres and Special Schools. This includes: 19 LSCs which offer 281 planned places for primary aged pupils with a range of Additional Learning Needs. 8 LSCs at secondary level, which offer 163 funded planned places. These Learning Support Centres offer specialist placements for children and young people with needs including Autism Spectrum Disorder; Social, Emotional and Behavioural Difficulties; Speech, Language and Communication; Hearing Impairment and Moderate / Severe / Profound Learning Difficulties. Education is also provided for pupils in 2 special schools (Ysgol Maes y Coed and Ysgol Hendrefelin), catering for the needs of children and young people with the most complex ALN.</p> <p>Through a robust tracking and monitoring system, Local Authority data indicates that at primary level, the greatest area of need and therefore demand on specialist provision for the next 3 years remains in relation to Autism Spectrum Disorder (ASD), in addition to Severe and Profound Multiple Learning Difficulties (SLD/ PMLD). At secondary level, the greatest area of need and therefore demand on specialist provision for the next 3 years remains is also in relation to Autism</p>

			<p>Spectrum Disorder (ASD), Moderate Learning Difficulties (MLD) and Social Emotional and Behavioural Difficulties (SEBD). This proposal seeks to ensure that resources are utilised effectively in line with the need for specialist places within the County Borough as any savings made from the closure of the LSC will be used to address pressures in high need ALN areas.</p> <p>The Council is required to have regard for the needs of disabled learners and learners with learning difficulties when assessing transport needs.</p> <p>Transport decisions made on Additional Learning Needs (ALN) grounds form part of the Children and Young People service's arrangements for children with additional learning needs. The Council will make suitable arrangements for learners with special needs to attend school including arrangements, as necessary, for home to school travel. An assessment of a learner's level of travel need will inform the type/level of transport that may need to be provided. The entitlement will be reviewed on an annual basis. (Home to School Travel Policy Neath Port Talbot Council). There is no negative impact on pupils with SpLD and transport needs as a result of this proposal.</p> <p>It is therefore expected that this proposal will have an overall positive impact on this aspect.</p>
<p>Gender reassignment</p>		<p>x</p>	<p>It is expected that all NPTCBC schools meet the needs of pupils and staff who are transgender.</p> <p>Local Authority and school policies are in place in all mainstream schools in terms of gender reassignment. Employees and pupils within the schools are protected by the policies adopted by the Governing Body.</p> <p>The proposal will have a neutral impact on this aspect.</p>

Marriage & civil partnership			x	<p>Pupils at most of the mainstream schools are below the legal marriage age. Staff at all mainstream schools receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at the school.</p> <p>Employees within all schools will be protected by the policies adopted by the Governing Body and will have access to suitable HR advice.</p> <p>The proposal will have a neutral impact on this aspect.</p>
Pregnancy and maternity			x	<p>The provision of education for any pupil identified as being within this protected group would remain unaltered by the proposal.</p> <p>Employees within all schools will be protected by the policies adopted by the Governing Body and will have access to suitable HR advice.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Race			x	<p>All Neath Port Talbot schools are inclusive for pupils of all ethnic groups and ethnicity is not a criterion under the Council's Admissions Policy. In addition, the Council is an inclusive employer.</p> <p>Employees of schools within the Local Authority will be entitled to receive protection under the relevant employment and equalities law and policies which will be adopted by the Governing Body.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Religion or belief			x	<p>It is expected that the Council's educational arrangements will meet the needs of pupils or staff members of different religions or with different beliefs within all schools.</p> <p>Religion or belief is not a criterion under the Council's Admissions Policy.</p>

			<p>Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at all schools.</p> <p>Respect for all religious and non-religious beliefs would not change as a result of implementing this proposal. Similarly, the aspect of the curriculum relating to religion and belief would not change because of this proposal. The proposal does not seek to reduce the number of faith school places and increase the number of community (not-faith based) school places.</p> <p>The Estyn School Inspection Handbook also details how inspection would evaluate how well individual pupils benefit from the school. Under spiritual, moral, social and cultural development Estyn would look for evidence where pupils develop awareness and respect for diversity in relation to, for example gender, race, religion and belief, sexual orientation and disability.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Sex	x		<p>The Council is an inclusive employer. Across the Local Authority both male and female staff are employed within secondary education settings.</p> <p>Children of both sexes are treated and taught equally at all school within the Local Authority. There are no different methods of teaching or curricula based on sex. All schools aim to reduce, as far as possible, segregating pupils and students by gender.</p> <p>In general more boys than girls experience SpLD although often girls can experience more complex difficulties. Currently in NPT, of the pupils with a LA maintained IDP 60% are boys, matching the general trend across the UK.</p> <p>The benefits of support being provided in all mainstream schools, is likely to benefit both male and female pupils, ensuring that their peer groups are also extended</p>

				<p>beyond those pupils attending a provision and widening their curriculum opportunities.</p> <p>The proposal therefore is likely to have a positive impact on this aspect.</p>
Sexual orientation			x	<p>Inclusivity and respect of others is an intrinsic element of the National Curriculum, and all schools within the Local Authority seek to provide an inclusive environment which meets the needs of all pupils irrespective of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>

<p><b>What action will be taken to improve positive or mitigate negative impacts?</b></p>
<p>This proposal, if implemented would be closely monitored with information gathered regarding characteristics and circumstances of the individuals involved. From the evidence currently available the proposal should have mainly positive or neutral impacts on the protected characteristics due to the following actions-</p> <ul style="list-style-type: none"> <li>• All current pupils with SpLD are supported within mainstream schools in line with individual development plans and the 12 planned places in the LSC remain unfilled; additionally there are no staff employed for the LSC - therefore there is no direct negative impact on either pupils or staff</li> <li>• Providing SpLD pupils with support in their catchment school alongside pupils from their primary phase education is considered to be beneficial for pupil wellbeing and sense of belonging</li> <li>• Policies and procedures are in place in all schools to support with inclusive practice; local authority policies are also adopted and adhered to</li> </ul>

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?



Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	x			<p>Policies adopted by the Governing Body of all schools and teaching and learning will aim to eliminate discrimination, harassment and victimisation. Employees within all schools school are protected by Local Authority policies and policies adopted by the Governing Body and have access to suitable HR advice.</p> <p>Pupils are protected by Local Authority policies and policies adopted by the Governing Body.</p> <p>Pupils with an additional learning need could be at risk of discrimination, harassment and victimisation by others. Inclusion of pupils with SpLD within mainstream classes does not only support SpLD pupils but will also aim to raise awareness with other mainstream pupils and staff about SpLD, promoting greater acceptance and understanding and eliminating discrimination, harassment and victimisation. Pupils with SpLD moving into their catchment secondary school will have the opportunity to maintain and develop friendships forged in primary school years which can help with self-confidence and resilience.</p> <p>The National Curriculum also promotes inclusivity and acceptance through teaching and learning within the school.</p> <p>The Learning Needs Code for Wales also states:</p> <p><i>“The Welsh Government considers that an inclusive education, where all pupils access common opportunities in ways relevant to their needs, and which ensures that they fully belong to the school community, is of benefit to all... The ALN system relies on the knowledge and experience of teaching staff to identify ways of providing appropriate access to the curriculum for every child and young person. Meeting the needs of learners with ALN ought to be part of a whole school or institution approach to school or institution improvement.</i></p>

To advance equality of opportunity between different groups	x			As noted above, there are no pupils or staff to assess within the LSC for pupils with SpLD in Cwmtawe Community School. Support for pupils with SpLD within mainstream classes ensures that all pupils have equal access to opportunities in ways relevant to their needs and ensures that they fully belong to the school community, thus providing greater equality of opportunity.
To foster good relations between different groups	x			The emotional well-being of children and young people experiencing SpLD is a priority when promoting more positive outcomes for this group. Provision to support the confidence and emotional well-being of learners with literacy needs is key and mainstream settings can develop this by ensuring that the children and young people feel part of a learning community which recognises and responds to their needs. Learners should have a strong sense of belonging in their local mainstream school, in which a sense of belonging is a core element of embedding a whole school approach to emotional and mental well-being.

#### What action will be taken to improve positive or mitigate negative impacts?

This proposal, if implemented would be closely monitored in regards to the Public Sector Equality Duty (PSED). From the evidence currently available the proposal should have mainly positive impacts on PSED due to the following actions-

- Inclusion of pupils with SpLD within mainstream classes does not only support SpLD pupils but will also aim to raise awareness with other mainstream pupils and staff about SpLD, promoting greater acceptance and understanding and eliminating discrimination, harassment and victimisation.
- Raising awareness and promoting greater understanding of SpLD in mainstream classes helps to foster good relationships between all pupils.
- Staff at all mainstream schools will continue to raise awareness of inclusivity and will ensure that all pupils have equal access to opportunities in ways relevant to their needs and ensures that they fully belong to the school community, thus providing greater equality of opportunity.

#### 4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>The proposal, if implemented, should have a positive impact on groups who experience socio economic disadvantage.</p> <p>The proposal aims to provide local, accessible, sustainable, community-focused provision for pupils with SpLD within their catchment school within the Local Authority.</p> <p>For some pupils, distance to their catchment mainstream school would be closer than to a provision, this could result in the ability to work/cycle to school potentially leading to reduced travel costs for parents</p> <p>The proposal would therefore have a positive impact in this regard.</p>
Negative/Disadvantage	<p>As there are currently no pupils or staff at the LSC for SpLD at Cwmtawe Community school there should be no direct negative impact at the current time as a result of this proposal.</p>
Neutral	<p>Currently, specialist support for pupils with SpLD is provided in all mainstream establishments in line with individual pupil IDPs and forms part of a continuum of support in line with the ALN Reform Act. The implementation of this proposal will not affect the current provision for pupils with SPLD within all mainstream schools. Support will be provided regardless of any specific socio-economic disadvantage.</p> <p>There are no staff members employed within the LSC for pupils with SpLD in Cwmtawe Community School therefore no staff members will be affected by the closure of the provision.</p>

#### What action will be taken to reduce inequality of outcome

- Progress of pupils across NPT with an IDP identifying their need as SpLD will be monitored by the local authority to ensure that there are no negative impacts as a result of the implementation of this proposal.
- Monitoring of the support available and of the improved awareness of SpLD in all mainstreams secondary schools will take place annually

## 5. Community Cohesion/Social Exclusion/Poverty

	+	-	+	Why will it have this impact?
Community Cohesion			x	It is not expected that the closure of a provision with no pupils or staff will impact on community cohesion
Social Exclusion	x			Continuing to support pupils with SpLD within mainstream classes ensures that all pupils have equal access to opportunities in ways relevant to their needs and ensures that they fully belong to the school community, thus providing greater social inclusion.
Poverty	x			Continuing to support pupils with SpLD within mainstream classes ensures that pupils are not at risk of participation poverty by providing opportunities for them to be included in activities experienced by their peers in their catchment school.

### What action will be taken to improve positive or mitigate negative impacts?

This proposal, if implemented would be closely monitored in regards to Community Cohesion/Social Exclusion/Poverty. From the evidence currently available the proposal should have mainly positive and neutral impacts on Community Cohesion/Social Exclusion/Poverty due to the following actions-

- There are no pupils or staff at the learning support centre for pupils with SpLD at Cwmtawe Community School so there is no direct impact
- Implementing the proposal will ensure that the positive impacts identified are realised
- Secondary school staff will continue to raise awareness of inclusivity and promote inclusion further throughout the schools

## 6. Welsh

	+	-	+/	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language	x			Cwmtawe Community School Learning Support Centre for pupils with SpLD is an English-medium provision. Following the proposed implementation of this proposal, specialist support for pupils with SpLD will continue to be provided in all mainstream establishments including Welsh-medium schools in line with individual pupil IDPs and will form part of a continuum of support in line ALN Reform. The language medium of Additional Learning Needs (ALN) provision is integral to the effectiveness and quality of the provision itself. Passing the Additional Learning Needs and Education Tribunal (Wales) Act 2018 (the Act) was a turning point in this context and established the principle that the ALN system in Wales needs to be bilingual, and therefore Welsh-medium provision is equitable to the English-medium provision. In line with the Additional Learning Needs Code for Wales, mainstream schools have a duty to deliver additional learning provisions (ALP) to support learners with ALN as set out in their IDP. This will ensure that pupils with SpLD are fully integrated and will have equal access to all aspects of mainstream activities and opportunities in the language of their choice.
– treating the Welsh and English languages equally	x			

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What action will be taken to improve positive or mitigate negative impacts?
<p>This proposal, if implemented would be closely monitored in regard to Welsh. From the evidence currently available the proposal should have mainly positive and neutral impacts on the Welsh language. Actions to improve positive impacts will include:</p> <ul style="list-style-type: none"> <li>• Ensure that specialist Welsh language SpLD resources are available for all pupils (DACC (Datblygu Addysg Cynhwysfawr Cymraeg) Welsh-medium ALNCo group to monitor this)</li> <li>• Ensure appropriate language support for secondary schools wishing to move along the language continuum i.e. teachers increasing the use of Welsh within lessons.</li> </ul>

## 7. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			x	<p>Neath Port Talbot County Borough Council (NPTCBC) has a legal duty to maintain and enhance biodiversity, and in so doing, promote the resilience of ecosystems under the Environment (Wales) Act 2016. The Council's Biodiversity Duty Plan demonstrates how we will fulfil that duty and will act as a driver for conservation activities throughout Neath Port Talbot (NPT).</p> <p>The Biodiversity Duty Plan not only delivers our statutory duties with regards to biodiversity but also explains how, through meeting the Biodiversity Duty, we are delivering well-being objectives and the ways of working under the Well-being of Future Generations (Wales) Act 2015.</p> <p>This is not a criterion that will be impacted upon by this proposal</p>
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			x	

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What action will be taken to improve positive or mitigate negative impacts?
<ul style="list-style-type: none"> <li>Any future impacts will be monitored closely following the proposed closure of the LSC</li> </ul>

## 8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. <b>Long term</b> – looking at least 10 years (and up to 25 years) ahead	<p>This proposal will support the Councils wellbeing objective 1 – ‘all children get the best start in life’ by ensuring that resources are utilised effectively in line with need.</p> <p>Cwmtawe Community School is currently receiving additional funding to manage the 12 planned places within the LSC for pupils with SpLD with 0 pupils attending in September 2024. The provision is funded from the delegated schools budget and the school receives funding for additional places at Band E which equates to approximately £17,176 per annum. Should the proposal be approved, the funding will be repurposed to provide additional provision in areas where we have identified the greatest need.</p>
ii. <b>Prevention</b> – preventing problems occurring or getting worse	<p>Closing the specialist provision and continuing to support pupils with SpLD within the Local Authority’s mainstream schools in line with individual pupil IDPs forms part of a continuum of support in line with the ALN Reform Act. In line with the Additional Learning Needs Code for Wales, mainstream schools have a duty to deliver additional learning provisions (ALP) to support learners with ALN as set out in their IDP. This will ensure that pupils with SpLD are fully integrated and will have equal access to all aspects of mainstream activities and opportunities.</p>
iii. <b>Collaboration</b> – working with other services internal or external	<p>A range of Council services are involved in ensuring that appropriate support is provided to pupils with IDPs and this forms part of a continuum of support in line with the ALN Reform Act,</p>

iv. <b>Involvement</b> – involving people, ensuring they reflect the diversity of the population	Informal consultation has taken place with a range of stakeholders to help shape the proposal. Additionally the proposal will be subject to a comprehensive consultation with a wide range of stakeholders for a six week period.
v. <b>Integration</b> – making connections to maximise contribution to:	This proposal has a positive contribution to the Council's well-being objectives as it aims to ensure that pupils with SpLD are supported and are able to make progress within mainstream classes and settings.
<b>Council's well-being objectives</b>	The Council's well-being objectives and the supporting improvement priorities are set out in the Council's Corporate Plan. This proposal directly supports wellbeing objective – 'to ensure all children get the best start in life' by ensuring that resources are utilised effectively in line with need.
<b>public bodies objectives</b>	This proposal indirectly supports the Public Services Board priority to promote well-being through and in the workplace

## 9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

If the proposal is implemented then school staff within mainstream settings will monitor the progress and wellbeing of pupils with SpLD to ensure that identified positive impacts are being implemented. Monitoring will take place on a regular basis by Support for Learning and Inclusion officers, ESO officers and outside bodies including Estyn.



## 10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
<b>Equalities</b>	The proposal will have a positive impact on age, disability and sex, and neutral on race, religion or belief and sexual orientation, gender reassignment, marriage and civil partnership and pregnancy and maternity.
<b>Socio Economic Disadvantage</b>	The proposal will have both neutral and positive impacts on socio economic disadvantage.
<b>Community Cohesion/ Social Exclusion/Poverty</b>	The proposal will have a neutral impact on community cohesion but should have a positive impact on social exclusion and poverty
<b>Welsh</b>	The proposal will have a positive impact on the Welsh language
<b>Biodiversity</b>	The establishment of the provision has no impact on biodiversity
<b>Well-being of Future Generations</b>	This proposal directly contributes to the Council's wellbeing objective 'to ensure all children get the best start in life'.

### Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised X
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

In conclusion the proposal would have a mainly positive or neutral impact in all areas, and directly contributes to ensuring that pupils are given the best start in life. It will ensure that pupils with SpLD are given the opportunity to access high-quality, well-differentiated 'quality first' teaching across the curriculum within our mainstream schools and settings, as informed by current research and national guidance. It provides the opportunity to redistribute resources to better meet the needs of ALN pupils across NPT.

### 11. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Ensure all schools have the appropriate policies in place and are aware of how to support pupils with SPLD in mainstream settings	Inclusion Team	Ongoing	Monitoring indicates good progress is made

### 12. Sign off

	Name	Position	Signature	Date
Completed by	Kate Windsor-Brown	Transformation Coordinator		04.09.24

<b>Signed off by</b>	<b>Rhiannon Crowhurst</b>	<b>Head of Service/Director</b>		<b>04.09.24</b>
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Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

### Cabinet

2 October 2024

### Report of the Director of Education – A.D.Thomas

#### Matter for Monitoring

#### Wards Affected:

All Wards

**Report Title:** School Based Counselling Service Update.

#### Purpose of the Report:

This report will provide Members with an update on the School Based Counselling Service (SBCS) including statutory roles and responsibilities, referral data and outcomes for children and young people, services for school staff, recruitment and retention of staff, waiting times and an update on plans and delivery.

#### Executive Summary:

School Based Counselling is a statutory service offered to children and young people (CYP) in Year 6 and above across Wales. Since 2020-2021, Welsh Government have committed grant funding to Local Authorities through the *Whole School Approach to Emotional Health and Wellbeing* for services to be extended to children below this statutory school age. In recognition of the growing need for early

intervention services and provision, Neath Port Talbot (NPT) have invested core funding to ensure that children below Year 6 will have sustainable access to counselling and therapeutic support, without reliance upon grant funded money. Despite additional core and grant investment, the increased demand on the service remains a challenge.

The length of time a CYP is waiting to receive direct therapy reduced during 2023-2024 when compared to 2022-2023, although this is higher than in 2020-2021. A key factor in this relates to the increase demand on the service, with referrals almost doubling post Covid from 480 in 2020-2021 to 911 in 2023-2024. However, when pupils receive counselling, the outcomes are significant. In the academic year 2022-2023 NPT SBCS was ranked first out of the twenty one Local Authorities across Wales in terms of improvements made following counselling. It is expected that when the national statistics for School Based Counselling is released by Welsh Government in March 2025, NPT School Based Counselling Service (SBCS) will rank highly for 2023/2024 also.

During 2023-2024 the SBCS supported 843 children and young people (compared to 658 in 2022-2023), over 4686 sessions (compared to 3894 in 2022-2023). Of these, 125 pupils (1549 sessions) were from primary schools and 718 pupils (3137 sessions) were from secondary schools.

This substantial increase in service delivery was achieved by addressing recruitment issues within the service which had previously led to long term vacancies.

**Background:**

The NPT SBCS is comprised of School Based Counsellors, Play Therapists and a Drama Therapist. In addition to the Manager and Deputy Manager, there are currently 12 full time equivalent school based counselling staff who hold permanent posts within NPT.

NPT SBCS is committed to helping CYP address emotional and mental health issues so that they may rise through adversity, achieve their potential and lead fulfilling lives. This is achieved through the provision of counselling and child therapy from Years 1-13 across NPT. The service supports schools in this joint endeavour through consultation, support and high quality in house training which is available to Head Teachers, Governors, teaching and non-teaching staff.

The work of the SBCS is underpinned by The School Standards and Organisation (Wales) Act 2013. Under this framework, all Local Authorities in Wales have a duty to provide SBCSs to Year 6 pupils and above. However, since the pandemic and in recognition of the increased need for counselling and therapeutic support to children, Welsh Government have directed Local Authorities to provide a counselling service to children below Year 6. No specification was given as to how far to extend the service, however, in order to ensure early intervention and to meet need, NPT SBCS adopted a preventative approach by extending the service to Year 1 and creating a new school based child therapy model.

Waiting lists for Secondary School Based Counselling and Primary School Based Child Therapy are monitored frequently and resources allocated accordingly. Pupils are invited to complete feedback forms for each area of the service which then informs any changes or continuation of service delivery. Secondary school pupils are able to self-refer directly into the service via the service website.

In addition to support for CYP, the service recognises the importance in addressing school staff wellbeing, through initiatives such as the School Staff Supervision Service Pilot and School Staff Counselling Service.

## Recruitment and Retention of Staff

Team members are well supported through half termly one-to-ones, peer supervision, external clinical supervision, team meetings and Performance Development Reviews. Performance Development Reviews are held annually in line with corporate policies and there are regular continuing professional development opportunities provided in accordance with relevant professional organisations such as British Association of Counselling and Psychotherapy (BACP).

In line with national trends across Wales, NPT SBCS has previously experienced challenges in relation to recruitment and retention of staff. For a significant period in the academic year 2021/2022, there were 7.7 vacancies. School Based Counsellor salaries are typically nationally lower than those across the wider counselling profession, particularly within the NHS. This makes retention and recruitment of staff challenging; this funding issue has been highlighted to Welsh Government. While additional grant funding has been welcomed, it has created workforce pressures for Local Authorities who are trying to recruit school based counsellors within the same period of time. Again, this has been highlighted to Welsh Government.

However, in recognition of the need to recruit highly specialised and experienced staff, NPT SBCS has recently undergone a job evaluation which resulted in salary increases (from Grade 8 to Grade 9). This created parity with NHS roles and has improved recruitment, ensuring future sustainability of the service. The number and calibre of applicants for roles within the SBCS has increased and there is currently only one vacancy which has resulted from the promotion of a team member within the service. This should enable the service to begin addressing waiting times over the next academic year, whilst considering the increasing demand in need.



## Secondary School Based Counselling and Primary School Based Child Therapy Service

YEAR	No. CYP accessing SBCS	No. sessions delivered	No. Primary CYP supported	No. Secondary CYP supported
2022-2023	658	3894	109	549
2023-2024	843	4686	125	718

### Impact and Evaluation

YP CORE is an assessment tool used to monitor improvements in emotional wellbeing. During the year 2023-2024, average YP scores showed a significant positive improvement.

In the academic year 2022-2023 NPT SBCS was ranked first out of twenty one Local Authorities across Wales in terms of improvements made following counselling. It is expected that when the national statistics for School Based Counselling is released by Welsh Government in March 2025, that NPT School Based Counselling Service (SBCS) will rank highly for 2023/2024 also.

The Strengths and Difficulties Questionnaire (SDQ) is used to monitor change at primary school level. Similarly, average scores showed a substantial improvement. National comparative data is not available for SDQ.

Additionally, feedback forms are utilised to gain the views of pupils, parents and schools regarding the service they have received. Feedback is overwhelmingly positive.

## Waiting Times

At secondary level, pupils are offered the next available appointment for an initial assessment. The purpose of this assessment is to gain an overview of the pupil's needs, what they would like to achieve through therapy and to assess risk. Those presenting with high levels of risk are prioritised. By working in this way, the service ensures that those most in need are seen as soon as possible.

At primary level, it would not be appropriate to adopt the same practice, as due to the younger age of the pupils, they would experience difficulty in beginning a relationship with a therapist to then have to wait period of time for their next session. This is why the waiting times for assessment and first session are the same for primary.

Average waiting times were as follows:

### Whole Service Level Waiting Times

3.63 weeks (assessment)  
10.38 weeks (first session)

### Primary School Based Child Therapy Waiting Times

8.86 weeks (assessment and first session are the same date).

### Secondary School Based Counselling Waiting Times

2.86 weeks (assessment)  
10.58 weeks (first session).

Waiting times have reduced by 2.07 weeks for an initial assessment in 2023-2024 and by 3.98 weeks for a first session of therapy. Whilst

this is encouraging, it should be noted that waiting times for a first session are 3.61 weeks longer than they were in 2021-2022.

A key factor in waiting times over 2023-2024 is likely to be the substantial increase in referrals over the last four years.

Please see below for number of referrals each year since 2020-2021.

Year	Number of Requests	Difference
2020-2021	480	-
2021-2022	561	+81
2022-2023	722	+161
2023-2024	911	+189

Since Covid, the service has received almost double the number of requests for therapy from 480 in 2020-2021 to 911 in 2023-2024, an increase of 431 pupils.

In recognition of the substantial additional need, it is imperative that Welsh Government, the Local Authority and the Education Directorate continue to invest in the School Based Counselling Service in Neath Port Talbot.

In order to address the length of time a child or young person waits for counselling, the service is exploring a range of possible solutions.

### Missed Appointments

During 2023-2024, there were 47 Did not Attend (DNA) at Primary level and 150 at Secondary Level, totalling 197 missed therapy sessions across the year when pupils were in school. Had these appointments not been missed, an additional 40 pupils could have received and completed their therapy, reducing the waiting list carried over into the new academic year from 47 to 7. Whilst a certain number of DNAs is inevitable, the SBCS will be working with schools to reduce this over the coming year.

## Group Work

During 2023-2024, the top five presenting issues were Anxiety, Family, Bereavement, Anger and Self Worth respectively. The SBCS has allocated 2 days per week for 2024-2025 in order to run group sessions around these themes for children and young people. This work has the potential to impact on waiting times.

## Placements

Student placements at primary and secondary level will increase capacity through providing more therapy sessions delivered by trainee therapists. Trainee therapists will be allocated pupils with a lower level of need, appropriate to their stage of training and receive high quality in house supervision. This will also create the possibility that through providing a positive placement experience, trainee therapists make wish to work within Neath Port Talbot School Based Counselling Service following qualification, therefore enhancing recruitment opportunities for the service.

## Parent Work

During 2023-2024, a primary school within NPT recognised the need to support parents and had identified a range of wellbeing and mental health difficulties within their parent population. It was hoped that if parental wellbeing could be elevated, this may have a positive impact on their children. The head teacher collaborated with the SBCS and through their delegated schools budget, purchased additional input from the service. Self Care group work sessions were run in a community setting and 11 parents attended across two groups. Groups ran for 7-8 sessions. The work was evaluated using the Warwick Edinburgh Mental Wellbeing Scale.-Whilst both groups began with average scores which are deemed to be indicative of high risk of major depression, they showed a substantial improvement in wellbeing and scores moved out of the 'risk' range.

The Headteacher also reports (anecdotally) improved relationships between the parents attending the group and school as well as improved attendance of pupils of the parents who were involved.

Unfortunately due to school budget pressures, the Head Teacher of the school has reported that they are unlikely to be in a position to fund this work beyond the two groups described above.

### School Staff Counselling Service

During 2020/2021 a School Staff Counselling service was created in order to further support staff in recognition of well documented low levels of school staff wellbeing.

During 2023-2024, this service supported 36 members of staff over 115 sessions. CORE 10 is used to monitor change and a substantial improvement in wellbeing was demonstrated using this measure.

Anxiety is the highest presenting issue for school staff using this service. The average wait for counselling is 4.6 weeks and the number of DNAs low at 2 sessions.

### School Staff Supervision Pilot

Supervision supports the wellbeing of staff and upskills them in their pastoral role which has increased in complexity over time. Supervision is provided by qualified counsellors and supervisors and this work is underpinned by academic research.

The creation of a School Staff Supervision Pilot began in 2020, with one to one, monthly clinical supervision being provided for pastoral school staff in three secondary schools. This was in recognition of low staff wellbeing levels across the education sector and the link between this and pupil wellbeing. This work also recognised the formalisation of the responsibility of school staff in regards to

emotional wellbeing as highlighted in *The Together for Mental Health Plan*, the '*Framework on embedding a whole-school approach to emotional and mental well-being*' (Welsh Government, 2021) and the *Mental Health Measure Wales (2011)* as well as the low levels of confidence of school staff with regards to work of this nature.

During 2023/2024, this service provided 532 supervision sessions to 92 members of school staff across 8 schools. For this service, the Warwick Edinburgh Mental Wellbeing Scale (WEMWBS) is used to measure impact and a substantial improvement in average wellbeing was shown.

School staff accessing this service during 2024-2025 on average reported wellbeing levels greater than the national average for education and staff and the general population on completion of their supervision sessions for 2024-2025.

Feedback from the project has been positive and there are plans to expand this service for 2024-2025.

### Collaboration with Partners

The SBCS collaborates well with other Inclusion services and partner agencies which enables children and young people to receive a holistic service through the utilisation of relevant skill sets. This is particularly pertinent in relation to the Emotional Health and Psychological Wellbeing (EHPW) forums. These consultations take place once per term in each school cluster, which provides a reflective space for schools to discuss emotional health and wellbeing related issues.

The 'consultation team' is comprised of a school-based counsellor (SBC), a wellbeing service (WBS) practitioner, an educational psychologist (EP) and a practitioner from the Child and Adolescent Mental Health Service (CAMHS). Occasionally, other relevant professionals who have expertise in children and young

people's emotional health and wellbeing (e.g. Cynnydd worker, Education Welfare Officer etc.) may also be present. Additionally, the Manager of the SBCS represents the Education Directorate as part of the Emotional Health and Wellbeing programmes within the Regional Partnership Board. This joint working has strengthened working relationships with local CAMHS services.

During 2023-2024, 81 cases were discussed. Of these cases, 52% resulted in advice for school and 13.3% resulted in SBCS input demonstrating the need to provide direct intervention or more in-depth support in more complex cases.

### Critical Incidents

During 2023-2024, the NPT community sadly experienced six critical incidents in relation to children and young people. The SBCS provided an immediate response and presence to the schools affected through providing emotional support to the school community including staff and pupils. The team assessed the needs of the school community in order to inform the response day by day. The SBCS also provided advice and support to the Head teacher and Senior Leadership team regarding how to best support staff and pupils across the whole school during such a difficult time. The SBCS Manager is leading a Critical Incident Working Party which is tasked with creating a multi service/ agency response to critical incidents. This is a partnership between Education and Health.

### **Financial Impacts:**

There are no financial implications associated with this report.

### **Integrated Impact Assessment:**

There is no requirement to undertake an Integrated Impact Assessment as this report is for monitoring / information purposes.

### **Valleys Communities Impacts:**

There is no impact or implications.

**Workforce Impacts:**

There are no workforce implications associated with this report.

**Legal Impacts:**

There are no legal implications associated with this report.

**Risk Management Impacts:**

No implications.

**Crime and Disorder Impacts:**

No implications

**Counter Terrorism Impacts:**

No implications

**Violence Against Women, Domestic Abuse and Sexual Violence Impacts:**

No implications

**Consultation:**

There is no requirement for external consultation on this item.

**Scrutiny Observations:**

Scrutiny considered this report on September 12<sup>th</sup>, 2024. No significant questions were raised and no amendments were requested. Members were appreciative of the report.

**Recommendations:**

The report is for information.



**Reasons for Proposed Decision:**

Not applicable .

**Implementation of Decision:**

Not applicable.

**Appendices:**

None

**List of Background Papers:**

Counselling for children and young people: September 2020 to August 2021 (Welsh Government, 2021)

Together for Mental Health Plan (2021)

Framework on embedding a whole-school approach to emotional and mental well-being' (Welsh Government, 2021)

Mental Health Measure Wales (2011).

The School Standards and Organisation (Wales) Act 2013.

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Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

**Cabinet**  
**2 October 2024**

**Appendix B and C - Not for publication pursuant to Regulation 5(2) & (5) of Statutory Instrument 2001 No. 2290 and Paragraph 14 of Part 4 of Schedule 12A to the Local Government Act 1972. Pursuant also to Paragraph 21 of the Schedule, and in all the circumstances of the case, the public interest in maintaining the exemption is considered to outweigh the public interest in disclosing the information.**

### **Report of Director of Education, Leisure & Lifelong learning**

#### **Matter For Decision.**

#### **Wards Affected:**

All wards

#### **Report Title**

Future provision of Indoor Leisure Services

#### **Purpose of the Report:**

To provide an overview to members of the progress of ongoing discussions with Celtic Leisure ("Celtic Leisure") following a determination by members to enter into dialogue for an extension of the Neath Port Talbot Council's ("the Council") contract dated 14<sup>th</sup> April 2016 ("the Contract") and to determine whether to now pursue an extension.

#### **Executive summary:**

This report sets out three options for members to consider in relation to the future operation of the indoor leisure services.

Whilst there are many positive reasons for choosing to insource the service, the costs related in doing so are significant and in the current financial and funding climate and will inevitably lead to cuts within the service and across the wider Council. Option 2,

represents the best value for money and would see the extension of the Celtic Leisure Contract for a period of 5 years with the staff retained on their existing terms and conditions. This has been provisionally negotiated with Celtic Leisure on the basis it mitigates many of the issues of previous concern. In particular this makes provision for inflationary costs, provides a regular staff pay award, creates an investment fund designed to improve services and drive income, and provides protection against inflationary pressures for utilities and similar costs.

Trade Unions have been fully engaged through a working group process and have put forward an alternative option (3) which, they would contend, is more favourable than the insourcing option. However, it would still add considerable costs for the Council

The Education, Skills and Wellbeing Scrutiny Committee met on the 12<sup>th</sup> September 2024 to consider this report. However, following this meeting, further clarification was provided by Trade Unions on the details their proposal in respect of Option 3.

## **Background**

In Spring 2022, the Council took the decision to bring the indoor leisure services back in house.

Immediately after the decision was made a series of working groups were set up to work towards a transfer. The groups were focussed on ensuring a safe transition for customers and staff and on trying to drive down the costs of transferring which were previously reported as £1.5m a year.

With increasing pressure on the Council's budget, especially with inflation running into double figures and the Welsh Government's settlement far below the level of inflation the implementation date was delayed by 12 months to 1<sup>st</sup> April 2024 in the hope the financial climate would have settled down. As members will be well aware, the financial picture continued to worsen and subsequently the implementation date was moved back again to 1<sup>st</sup> April 2025 which coincided with the end of the Contract. The decision to further delay the transfer in 2024/25 was based on trying to safeguard jobs and public services within the Council and across Celtic Leisure.

On the 16<sup>th</sup> January 2024, senior Council officers and members met with the Celtic Leisure staff at the request of the trade unions to communicate the intention not to insource from April 2024. At that meeting the trade unions asked for (and it was agreed) a working group be set up to further review the financial pressures and guide the future strategy.

The Contract contains a provision that, should the Council and Celtic Leisure agree, it can be extended for a period of five calendar years from the 1<sup>st</sup> April 2025 and on 18<sup>th</sup> March 2024, Cabinet resolved to agree the issue of a formal contract notice to Celtic Leisure Limited in respect of a possible extension of the term to ensure that all options can be considered by elected members going forward. Celtic Leisure subsequently

indicated their willingness to enter those discussions but only on the basis of an extension period of the full 5 years.

Throughout the year a working group has been meeting with representatives from the Council, Celtic Leisure and Trade Unions to examine all the options available and provide challenge on the issues surrounding the insourcing.

The agreed aim of the group was to “*provide a safe working space for the Unions, NPT Council and Celtic Leisure to understand discuss and challenge issues regarding proposed transfer of the Celtic Leisure contract back to the Council*”.

At the initial meeting all parties agreed there must be a clear way forward developed to allow enough time to affect a smooth transition into the Council should that be the agreed way forward and provide the Celtic Leisure staff with certainty after a long period of instability. Everyone expressed a desire to safeguard jobs and continue to improve the standard of the services.

The working group challenged the costs of insourcing, particularly the pension and weekend working estimates. These were both reworked with the group accepting the methodology. The pension costs were reduced by approximately 10% but with 213 staff in the NEST pension scheme compared to 78 in the Local Government Pension scheme the employers’ contributions of circa 22.4% mean the additional associated costs are still very considerable, standing at £832k.

The group also looked at weekend working enhancements and particularly if there is any flexibility and whether this should be offered across Celtic Leisure for all staff or just permanent employees. After detailed analysis the financial savings from both of these were negligible and would be at risk of being in breach of legislation and policy, with the creation of a two-tier workforce. The working group also looked at the salaries of staff working across similar leisure providers in South Wales and found these were broadly comparable to what Celtic Leisure are currently offering.

Trade Unions have subsequently recognised that insourcing is unaffordable (due to factors such as business rate liability) but have requested a number of conditions updated in the correspondence received from the Unions on 19<sup>th</sup> September. A summary of how this works financially is presented in Appendix B.

With the Contract ending on 31<sup>st</sup> March 2025 a determination must now be made as to whether the Council wishes to formally extend the Contract with Celtic Leisure.

Members have three options open to them:

- (1) Proceed with the insourcing of Celtic Leisure from 1<sup>st</sup> April 2025; or
- (2) Agree a five-year extension of the Contract with Celtic Leisure from 1<sup>st</sup> April 2025 with the current staff terms and conditions; or
- (3) Agree a five-year extension of the Contract with Celtic Leisure from 1<sup>st</sup> April 2025 with additional funding to facilitate the revised staff terms and conditions as per

the request from Trade Unions should the Celtic Leisure board be minded to agree.

#### Option 1: Proceed with the insourcing of Celtic Leisure from 1<sup>st</sup> April 2025

The proposed insourcing of Celtic Leisure would be subject to the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) meaning they would transfer under their existing terms and conditions. Under TUPE the better pension scheme must be offered to all employees. This would inevitably be financially advantageous for the current Celtic Leisure staff.

As a charity Celtic Leisure gain from relief on Non-Domestic Rates (NNDR) which the Council would not benefit from, however some VAT changes and the loss of the senior officer's post would achieve approximately £400k of efficiencies. The financial impacts are detailed later in this report.

Insourcing could make the leisure offer across Neath Port Talbot more coherent and possibly lead to a number of advantages in closer working across Council departments. These are likely to have minimal financial impact with no quantifiable savings having been identified.

The high costs of insourcing are fixed and will remain however hard the business is driven. With the current severe pressure on the Council budget there is a very real risk that insourcing would directly lead to job losses across the Council and from the Celtic Leisure cohort, with potential reductions to the indoor leisure service having to be made.

#### Option 2: Agree a five-year extension of the Contract with Celtic Leisure from 1<sup>st</sup> April 2025 with the current terms and conditions.

In order to agree a five-year extension of the Contract with Celtic Leisure a formal deed of variation and extension will be entered into, which will include an extension to all lease agreements for facilities operated by Celtic Leisure. All of this is currently stipulated under the Contract if an extension is to be pursued.

Following detailed discussions with Celtic Leisure the principles as outlined in Appendix A are being proposed. These principles deliver on some of the concerns around the current contract terms, notably the lack of provision for an annual pay award, allowances for inflation, and an allowance for the volatility in the utility markets, all of which have contributed significantly to the previous concerns about the viability of Celtic Leisure.

The intention will be to agree the management fee by 30 November each year ready for the following financial year. This gives Celtic Leisure certainty it will be solvent and able to trade effectively while ensuring allowances are made for some of the costs relating to the business.

Within the boundaries of the Contract the proposed principles will set the tone for more of a partnership approach where the Council shares the risk but also benefits from

investment and increased trade. The proposal also delivers a contribution to the Council's Medium-Term Financial Plan targets for 2025/26 which is consistent with what is being asked across other Council service areas.

A fundamental part of the proposal is the creation of an investment fund, which would be used to improve the offer, drive income up and reduce costs. It is proposed the permanent CEO, once appointed, would present to the Council an investment/business plan for the use of this fund within six months.

This option is by far the most financially advantageous of those being presented, however is likely to still be more expensive than outsourcing via a new procurement exercise, which would not be possible within the required timescale. It protects the jobs of those in Celtic Leisure provides some certainty for the staff, ensures the financial sustainability of the company and applies the principles being used to develop the Medium-Term Financial Plan across Council departments to Celtic leisure.

Option 3: Agree a five-year extension of the Contract with Celtic Leisure from 1<sup>st</sup> April 2025 with additional funding to facilitate the revised staff terms and conditions as per the request from Trade Unions should the Celtic Leisure board be minded to agree.

This option provides some of the benefits of option 2 but increases staff pay and gives access to the Local Government Pension Scheme.

On the 19th September, Unison submitted some further clarification, which is detailed below, along with a short narrative of response.

- *All contracted Celtic Leisure Staff be placed on NJC Pay lowest pay scales for grade from 1<sup>st</sup> April 2025 funded by NPTCBC subsidy including Celtic Leisure profits supported by the new revamped board members.*
  - The staff are employed by Celtic Leisure. Any decision therefore to transfer staff to NJC Pay lowest pay scales is a decision for Celtic Leisure and not the Council. The costs of placing all Celtic Leisure staff on the equivalent grades is £188k in the first year rising to £447k once all staff have moved to the top of the grade. The only way of funding this, at least initially, would be through increasing the management fee. The suggestion to limit increases to the bottom of the grade would require a fundamental change to the staff terms and conditions, which is a decision for Celtic Leisure.
  
- *NPTCBC to reduce management fee by less than stated in year 1 to cover increased staffing costs*

- This would in fact mean increasing the management fee, and in turn the burden on the council taxpayer by £188k in the first year, rising to £447k a year over the life of the contract.
  
- *All contracted Celtic Leisure Staff continued to be on NJC Pay scales year 2,3,4,5 of Celtic contract funded by Celtic Leisure Profits supported by NPTCBC also Board Members.*
  - The full financial impact of £447k has been shown in Appendix B.
  
- *Commitment from NPTCBC and new revamped Celtic Leisure Board Members to work towards staff-by-staff basis placing permanent staff member on the LGPS if requested and criteria is met.*
  - The staff are employed by Celtic Leisure. Any decision therefore to work towards transfer is a decision for Celtic Leisure and not the Council. The full costs of this proposal (£832k) assumes all staff transfer to the LGPS scheme and is shown in Appendix B.
  
- *Revamped Celtic Board made up of likeminded members committed to making the company the best with NPTCBC taking up their allocation of places also spaces for Trade Union leaders.*
  - Celtic Leisure is an independent company, and this is a decision for the Celtic Leisure Board. However, advice has been provided to members previously about taking up appointments to the boards of companies or charities on behalf of the Council and it would not be advocated that members take up seats in this regard, so any management of the arrangement be via the contractual arrangements.
  
- *Within five years Celtic Leisure in a place where they can stand on their own feet without subsidy also taking over other Leisure Contracts.*
  - The aspiration for Celtic Leisure to be run efficiently reduce the cost to the tax payer is shared by all parties, however it is unrealistic to suggest it will not require a subsidy in future years. It should be noted that the Contract will expire in five years in any event.



- *Celtic Leisure to be fully funded the increased staffing cost from year 5 onwards with increased surplus /profits from business plan created in partnership with new Celtic Leisure Board, trade unions and NPTCBC.*
  - The current proposal is to extend the Celtic Leisure contract by an additional 5 years as the current Contract allows. Anything beyond five years is outside of the current proposals
  
- *Continue the Working Group to reduce running costs for example exploring possible, Service Level Agreements.*
  - There is no intention to continue the current working group, however all parties are committed to working together to ensure an efficient value for money service and to improve the staff terms and conditions if affordable.
  
- Work with the APSE report to reduce costs further.
  - The new CEO of Celtic Leisure will be responsible for producing a business plan that will in turn unlock the investment fund. Improving services and reducing costs will be the way to ensure the indoor leisure services are sustainable in the longer term

The aspiration for Celtic Leisure to be run efficiently and reduce the cost to the tax payer is shared by all parties, however it is unrealistic to suggest it will not require a subsidy in future years. Celtic Leisure is an independent company and must retain that independence in order to operate within the law. Many of the suggestions from the Unions are decisions the company board would have to make and are not something the Council is able to, or should, influence.

The latest Union's proposal reduces the costs with the removal of the weekend working enhancements and while the costs are slightly less than insourcing, they are £1.279m more expensive than option 2.

### **Financial Impacts:**

With the predictions for the Welsh Government's financial settlement for the Council looking extremely challenging, each service area of the Council is currently being asked to assess what financial savings and efficiencies they can make for the 2025/26 financial year.

Adding significant costs for the indoor leisure services will add to the pressure on the revenue budget and will inevitably lead to greater cuts across the rest of the Council and

within the indoor leisure services themselves, this may include reduction in operating hours, reduction in staff levels or in some cases consideration to closure of some venues.

Appendix B details a summary of the three different financial options that have been considered.

To enable a full consideration of such matters, the following factors have been taken into account

- The subsidy for Pontardawe Pool which closed on 31<sup>st</sup> August on health and safety grounds, estimated to be £300k, has been removed from all options including the current in year costs.
- It is estimated that the costs of bringing all Celtic Leisure staff in line with Council terms and conditions is estimated to be in the region of £447k, for prudence the maximum valuation has been used in the calculations.
- Costs and savings related to implementing the principles in the table above have been applied equally to each of the options.

A narrative against each option is included below:

#### Option 1 – Bring the Indoor Leisure services back in house

This option adds £1.547m to the cost of running the indoor leisure services which will need to be funded by cuts either from within the service or from across the rest of the Council.

While this option is advantageous from a VAT perspective it adds considerable costs on Non-Domestic Rates, pensions and from bringing the Celtic Leisure staff onto the Council's terms and conditions.

Celtic leisure is currently benefiting from a favourable actuary assessment and therefore the additional pension costs are zero. If brought in house the actuary assessment would be made across the wider Council and there is a risk the pension costs would rise further. This cannot be quantified at this time and will be wholly dependent on a new actuary assessment being carried out.

#### Option 2: Agree a five-year extension of the Contract with Celtic Leisure from 1<sup>st</sup> April 2025 with the current terms and conditions.

This option does not provide the VAT efficiency of Option 1 but does reduce the Non-Domestic Rates bill.

Extending the Celtic Leisure contract by 5 years, in the view of officers, is clearly the most affordable option and offers the best value for money. The proposed contract adjustments as detailed in Appendix B will assist in addressing some of the concerns

previously raised by Trade Unions in that it makes provision for an annual pay award and addresses inflationary pressures.

This option will also provide an investment fund worth £1m over the 5 years of the contract to drive growth, make the business more sustainable and improve the offer to the public. Driving growth and tighter management of costs will help to ease the pressure on the Council's budget and at the same time reduce the council tax burden of this discretionary service.

This option provides a saving on the management fee against the current budget of £319k and has been built up using the principles described in Appendix B. The detailed financial model is presented in Appendix C.

Option 3: Agree a five-year extension of the Contract with Celtic Leisure from 1<sup>st</sup> April 2025 with additional funding to facilitate the revised staff terms and conditions as per the request from Trade Unions should the Celtic Leisure board be minded to agree.

This option does not provide the VAT efficiency of Option 1 but does reduce the Non Domestic Rates bill. However, it would still incur the pension costs, potentially up to the full amount for all eligible staff, whilst saving the weekend working and harmonisation costs of option 1. Option 3 would still increase the Council's costs by £959k which will need to be funded by cuts either from within the service or from across the rest of the Council.

#### Investment

A fundamental part of all the options presented is the creation of an investment fund, which would be used to improve the offer, drive income up and reduce costs. It is proposed the new CEO would present to the Council an investment/ business plan for the use of this fund within six months. It is vital for the sustainability of trading services that they benefit from regular investment and therefore an annual investment fund of £200k would be created to ensure the facilities are kept in good condition and can compete commercially.

#### **Integrated Impact Assessment:**

An integrated Impact Assessment (IIA) has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (no1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. This is attached as Appendix D to this report. Members are advised to review this report and consider the same as part of decision making.

#### **Valleys Communities Impacts:**

There are no valley community impacts over and above any impacts to all indoor leisure provision in Neath Port Talbot.

### **Workforce Impacts:**

There are no direct impacts to Council employees because of the recommendations included in this report.

It should be noted that any decision in respect of the terms and conditions of Celtic Leisure staff is not a decision for this Council and will be a decision of the board of Celtic Leisure. Any harmonisation of conditions is not something within the gift of the Council, even if financial resources were made available, it would be a determination of the Celtic Leisure board to determine how to utilise any funds.

### **Legal Impacts:**

Pursuant to the Contract between the Council and Celtic Leisure and further to the provisions of paragraph 1.18 of Schedule 6, the Council may (in its sole discretion) serve a notice on Celtic Leisure at any time after 30<sup>th</sup> September 2023 and before 31<sup>st</sup> March 2024 seeking an extension of the Contract Period (as defined in the Contract) by no more than five years and such notice shall indicate the proposed length of the contract extension and the terms.

A decision was made by Cabinet on the 18<sup>th</sup> March 2024 to serve this notice. The notice indicated that, subject to contract, that a contract extension of no more than five years (from the 1<sup>st</sup> April 2025) be offered on the basis of the extension and termination provisions included in the conditions of contract. The proposed terms being the same terms of contract as per the current Contract with a tapering subsidy as costs reduce and income continues to improve.

The notice was not a commitment that the Council would enter into an extension but merely preserved the option of continuing the current arrangement with Celtic Leisure (permissible under the Contract) should the financial conditions be such that members determine that this is an option they wish to consider.

Pursuant to paragraph 1.19 of Schedule 6, Celtic Leisure had three months from the date of such notice to inform the Council by way of a counter notice whether it was interested in principle in agreeing to an extension and whether it agreed to the Council's proposed terms and shall so respond within such period. A notification of interest was received on 16<sup>th</sup> May 2024.

Following ongoing discussions, Celtic Leisure subsequently confirmed on 5<sup>th</sup> September 2024 on a without prejudice and subject to agreement that that they would be content to proceed with the proposed offer.

To achieve an extension to the Contract, a formal extension agreement and variation agreement will be required to be entered into. Such arrangements however will continue

to be in compliance with the Public Contract Regulations 2015 and the Procurement Act 2023.

**Risk Management Impacts:**

The financial risks of each option are clearly set out in other sections of this report. The greatest risks are to the Celtic Leisure and Council staff where cuts may be necessary should the additional costs of insourcing be incurred.

The proposed contract changes will help avoid the situation whereby Celtic Leisure get into financial difficulty but there is a risk the Council may have to shoulder a greater financial burden as the contract progresses, particularly if there is a repeat of the cost of living crisis. However, this is partly mitigated by the investment principles and the ambition to drive growth.

With the current Contract coming to an end there is no longer enough time to test the market and procure the services externally so there is a risk value of money is not fully demonstrated.

Over the past few years, particularly since the start of the pandemic the Councils efforts have focussed on ensuring Celtic Leisure remains trading and that the indoor leisure facilities remain open and available for the local residents and in doing so the contract requirements for regular performance monitoring have been paused. This will be reset if the option of a 5 year extension is agreed and the CEO will be required to bring forward regular performance updates.

**Consultation:**

There is no requirement for formal consultation for this report however the report references the ongoing discussions that have taken place between the Council, Celtic Leisure and Trade Union colleagues.

**Scrutiny Observations:**

This report and the recommendations thereof were scrutinised by committee on 12<sup>th</sup> September.

Members asked a number of questions around how the working group analysed the costs of insourcing and whether all options for financial efficiencies in relation to Option 1 have been pursued. Members also asked for clarity on the robustness of Celtic Leisure from both a senior management and board perspective and were keen to understand the financial position of the company. Some questions were asked about the proposed management fee and how that has been put together and points made on how that could change over the life of the proposed extension.

One member requested that the recommendations in the report are adjusted to include the Leader within the delegations.

The recommendation to agree to pursue Option 2 as presented in the report was supported by way of a majority vote of the committee.

### **Recommendations:**

It is recommended that having due regard to the integrated impact assessment that:

- (a) Neath Port Talbot County Borough Council resolve to exercise the provisions of the contract between the Neath Port Talbot County Borough Council and Celtic Leisure Limited dated 16<sup>th</sup> April 2016 to extend the said contract for a period of five calendar years on the basis of the terms and conditions identified in option 2 of this report;
- (b) Delegated authority be granted to the Director of Education, Leisure and Lifelong Learning in consultation with the Leader and Cabinet Member for Nature, Tourism and Wellbeing to enter into an extension and variation to contract between the Neath Port Talbot County Borough Council and Celtic Leisure Limited dated 16<sup>th</sup> April 2016 to extend the said contract for a period of five calendar years on the basis of the terms and conditions identified in option 2 of this report;
- (c) Delegated authority be granted to the Director of Education, Leisure and Lifelong Learning in consultation with the Leader and Cabinet Member for Nature, Tourism and Wellbeing to enter into any documentation necessary to achieve the recommendations in paragraph (a) and (b); and
- (d) Delegated authority be granted to the Director of Environment and Regeneration in consultation with the Leader and Cabinet Member for Climate Change and Economic Growth to enter into an extension agreement and associated with the recommendation set out in paragraph (a).

### **Reasons for Proposed Decision:**

To ensure the ongoing provision of indoor leisure services in accordance with the terms of the Contract and ensure that value for money to the Council.

### **Implementation of Decision:**

This decision will be implemented following the conclusion of the three-day call in.

### **Appendices**

Appendix A Summary of proposed principles of an extension

Appendix B Financial Summary (Exempt)

Appendix C Celtic Leisure management fee proposal (Exempt)  
Appendix D Integrated Impact Screening Assessment

**List of Background Papers:**

18 March 2024 Cabinet report to seek authority for the formal contract notice to Celtic leisure.

1<sup>st</sup> February 2022 Cabinet report on the Future provision of Indoor Leisure services.

4 November 2021 Cabinet – Future delivery of Leisure Services

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## Appendix A

### Celtic Leisure contract - Summary of proposed principles

<b>Issue</b>	<b>Detail</b>
Indemnity Agreement	Throughout the Covid-19 pandemic and through the subsequent cost of living crisis the Council provided Celtic leisure with an Indemnity Agreement to ensure Celtic Leisure could meet any legal liabilities in respect of the provision of indoor leisure . Now trading conditions have settled down this indemnity would be removed as part of the five-year extension. However, the changes outlined in this table will help provide Celtic Leisure with reassurance they are able to continue to trade should things change and also sets up an open book, partnership moving forward.
LGPS Pension	Twenty six percent of the staff at Celtic Leisure remain within the LGPS scheme. Due to the age profile of that cohort specifically within Celtic Leisure a recent actuary assessment has reduced the Celtic Leisure contribution to zero. This is a temporary adjustment and the proposed management fee is based on a zero assessment. Should the actuary assessment be adjusted this will be automatically built into the fee for future years.
Utilities	Utility charges are projected to decline in the short term but with continuing uncertainty, especially with the ongoing conflict in the Ukraine, they may continue to fluctuate. The proposed management fee has been adjusted to reflect a reduction in the costs for 24/25 but as with the LGPS pensions assessment the proposal is adjust the management fee each year based on the market projections.
Pay Award	The current management fee has no allowance to reflect pay awards and one of the key issues for the Celtic Leisure staff is the lack of funding available to reflect this. The proposal is to build the nationally agreed pay award into the management fee going forward; again, adjusted each year depending on the latest projections.
Inflation	The current management fee has no allowance built in for inflation and with volatile (largely fixed) costs it is often difficult to pass these fully onto the consumer. Therefore, a CPI allowance has been built into the mgt fee for 24/25 and would be adjusted each year to reflect the current issues.
Investment	Any business needs consistent investment to grow and with a short-term extension of 5 years it is difficult for Celtic Leisure to borrow and depreciation will have an exaggerated effect on the balance sheet. Therefore, a top slice of £200k per annum has been removed from the management fee, to be held and spent by the council. This will aid the depreciation issue but also be VAT efficient. Celtic Leisure will be expected to bring forward an investment and business plan within 6 months of the new CEO commencing work. This investment will help to modernise the facilities and ensure they are in a good shape going forward.

Management fee – efficiency	The Council is having to make efficiency savings across all departments of circa 5% to ensure a balanced budget. Celtic Leisure have the ability to deliver this from additional income as well as making efficiencies across the business. Due to some local competition the ability to implement some price rises is limited and therefore a 4% rate has been applied. This will be reviewed annually.
Splashpark kiosk	Celtic Leisure currently manage the Aberavon Seafront splash park on behalf of the Council. This year the kiosk as expanded and offered to Celtic Leisure (in accordance with procurement requirements) to run as its more efficient to have one operator for the area and it also means the Council can take advantage of Celtic Leisure's charitable status for NNDR savings. This proposal will add the kiosk into the portfolio of leases for the duration of the extension.
Pontardawe Swimming pool	Pontardawe Swimming Pool closed/ closes on 31 August 2024 and this will reduce the Council's management fee. It is estimated this will be in the region of £300k per year and that figure has been worked into the new management fee. The £300k figure will be updated as the effect of the closure becomes known.
Board	As trustees express an interest to step down from the Board, the Company Secretary will begin a process to refresh the trustees and will, where possible, look at the skills required to support the Celtic Leisure board for the duration of the extended contract.
CEO	Celtic Leisure will undertake a robust recruitment process to find a new Chief Executive Officer with the intention of them being in place by 1 <sup>st</sup> April 2025. Council officers will actively be involved through this process, though it should be noted the final decision will rest with the Celtic Leisure board.
Annual Review	The principles of the management fee will be in place for the duration of the extension with the future years fee being agreed by 30 <sup>th</sup> November in the preceding year (i.e. 30 <sup>th</sup> Nov 2025 for the 26/27 financial year)

## Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

### Version Control

Version	Author	Job title	Date
1.1	Chris Saunders	Head of Leisure, Tourism, Heritage & Culture	30 August 2024

### 1. Details of the initiative

	<b>Title of the Initiative:</b> Future Provision of Leisure Services
<b>1a</b>	<b>Service Area:</b> Leisure, Tourism, Heritage & Culture
<b>1b</b>	<b>Directorate:</b> Education, Leisure and Lifelong Learning
<b>1c</b>	<b>Summary of the initiative:</b> To decide on the future delivery model for leisure services. The three Options for the future delivery of leisure services are, and the report seeks a determination from Members on the Option to be implemented:  <i>(1) Proceed with the insourcing of Celtic Leisure from 1<sup>st</sup> April 2025; or</i>  <i>(2) Agree a five-year extension of the Contract with Celtic Leisure from 1<sup>st</sup> April 2025 with the current terms and conditions.</i>  <i>(3) Agree a five-year extension of the Contract with Celtic Leisure from 1<sup>st</sup> April 2025 with revised terms and conditions as per the Union's request.</i>
<b>1d</b>	<b>Is this a 'strategic decision'?</b> Yes
<b>1e</b>	<b>Who will be directly affected by this initiative?</b>

## Option 1

### Service Users:

If members pursue Option 1, whilst the disruption to service users will be minimum, communication will be key, users will be kept up to date on any change process, via social media, member's app, and email and via information issued by the Council. This will form part of the mobilisation plan. The service offered to users will not be affected as the service specification will not change irrespective of which Option is considered, and the output specification will be implemented whichever delivery model is decided on.

### Celtic Leisure Staff:

There would clearly be workforce impacts on Celtic Leisure staff for all Options. The Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) applies to Option 1 where the service reverts to in-house council provision. The Regulations set out who is entitled to transfer, what rights they transfer with them, and how the transfer should be managed.

The key elements are:

- Identifying: determine which employees are affected.
- Information: in good time prior to the transfer, the outgoing employer informs and consults with all affected employees, communicating the fact that the transfer is happening and how they can object.
- Consultation with staff: the outgoing employer will consult with all affected employees well in advance of the transfer. This will involve recognised trade unions. The incoming employer must remember to inform existing employees as well.
- Employee liability (due diligence) information: at least 28 days before the transfer of contract, the outgoing employer must make the incoming employer aware of key employee or due diligence information.
- Measures: the incoming employer will inform and consult on any planned measures towards the employees after the transfer considering any implications of the employees' terms and conditions of employment, including pensions. Liabilities that transfer from the outgoing employer to the new one include all statutory and contractual rights. So, if the old employer did something to trigger claims, liability will pass to the new employer, including claims of, for example, unfair dismissal and discrimination.

### **Responsibilities that transfer include:**

- current terms and conditions of employment
- continuity of service
- redundancy payments, both statutory and contractual
- arrears of pay, holiday pay and sick pay and any accrued holiday entitlement

	<ul style="list-style-type: none"> <li>• liabilities accruing prior to the date of transfer under employment protection legislation, including liability for unfair dismissal and discrimination</li> <li>• the terms of any collective agreement incorporated into the employment contract</li> </ul> <p>Under Options 1 or 3 where there are significant additional costs involved it is likely there will need to be redundancies in Celtic Leisure and from across other council departments to fund the additional costs. Measures to support these employees can be agreed with the recognised trade unions of the council (to include UNITE as well as UNISON and GMB), e.g. to enable displaced employees from Celtic Leisure (those declared at risk of redundancy) to apply for vacant jobs in the council via the council's prior consideration scheme.</p> <p>If the service was transferred back to the Council (Option1), there will be an impact on the Council workforce, in particular support services in providing direct management and support to the services (which does not exist at present), with investment needed to provide these resources.</p> <p><b>Option 2 or Option 3</b></p> <p>In both Options 2 &amp; 3 the Celtic Leisure contract is extended and staff will remain employed by Celtic Leisure. A desk based assessment on pay rates for standard leisure based jobs locally has established that the current Celtic rates of pay are broadly equivalent to the local industry standard.</p> <p>The terms and conditions of the Celtic Leisure staff are a matter for the company board to consider and agree. However, in Option 2 no additional funding is provided within the management fee to fund the Celtic staff to access the Local Government Pension scheme (LGPS) or have enhanced terms and conditions as per the request from the Unions.</p> <p>Option 3 would see increased staff funding which, subject to agreement from the Celtic Leisure Board would see access to the LGPS and enhanced terms and conditions for all Celtic staff</p>
1f	<p><b>When and how were people consulted?</b></p> <p>Over the past nine months, a working group was established with representatives from the Council, Celtic Leisure and Trade Unions to examine the Options available and provide challenge on the issues surrounding the insourcing.</p> <p>The agreed aim of the group was to <i>“provide a safe working space for the Unions, NPT Council and Celtic Leisure to understand discuss and challenge issues regarding proposed transfer of the Celtic Leisure contract back to the Council”</i>.</p> <p>At the initial meeting all parties agreed there must be a clear way forward developed to allow enough time to affect a smooth transition into the Council should that be the agreed way forward and provide the Celtic Leisure staff with certainty after a long period of instability. Everyone expressed a desire to safeguard jobs and continue to improve the standard of the services.</p>

	<p>At this stage there are no changes to service provision so accordingly there would be no requirement for consultation with service users. In addition, until members determine what Option they wish to pursue, the appropriate consultation with Celtic Leisure staff cannot take place.</p>
<b>1g</b>	<p><b>What were the outcomes of the consultation?</b></p> <p>As indicated above, no formal consultation was required for the existing determination but if Options 1 is pursued consultation will take place with staff members impacted by any proposals pursuant to TUPE.</p> <p>The working group challenged the costs of insourcing, particularly the pension and weekend working estimates. These were both reworked with the group accepting the methodology. The pensions costs were reduced by approximately 10% but with 213 staff in the NEST pension scheme compared to 78 in the Local Government Pension scheme the employers contributions of circa 22.4% mean the costs are still unaffordable standing at an additional £880k per annum</p> <p>The group also looked at weekend working enhancements and particularly if there is any flexibility and whether this should be offered across Celtic Leisure for all staff or just permanent employees. After detailed analysis the financial savings from both of these were negligible and would be at risk of being in breach of legislative and policy, with the creation of a two tier workforce. The working group also looked at the salaries of staff working across similar leisure providers in South Wales and found these were broadly comparable to what Celtic Leisure are currently offering.</p>

## 2. Evidence

### What evidence was used in assessing the initiative?

There would clearly be workforce impacts on Celtic Leisure staff if Option 1 is considered. The Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) will apply. In line with the aforementioned TUPE Regulations this will have to be subject to consultation with staff.

The working group challenged the costs of insourcing, particularly the pension and weekend working estimates. These were both reworked with the group accepting the methodology. The pensions costs were reduced by approximately 10% but with 213 staff in the NEST pension scheme compared to 78 in the Local Government Pension scheme the employers contributions of circa 22.4% mean the costs are still unaffordable, standing at an additional £880k per annum.

The group also looked at weekend working enhancements and particularly if there is any flexibility and whether this should be offered across Celtic Leisure for all staff or just permanent employees. After detailed analysis the financial savings from both of these were negligible and would be at risk of being in breach of legislative and policy, with the creation of a two tier workforce. The working group also looked at the salaries of staff working across similar leisure providers in South Wales and found these were broadly comparable to what Celtic Leisure are currently offering.

The proposed management fee has been put together in direct consultation with Celtic Leisure on an open book basis and pursuant to the contractual arrangements in place.

### Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age			x	<p>Irrespective of which Option is pursued there would be a neutral impact on any protected characteristic – in all cases there would be no change to service provision envisaged. The Council would consider all Equality Act 2020 implications as part of decision making. If Option 1 is pursued, any issues in respect of staff of Celtic Leisure will be included as part of any TUPE consultation and will be factored into the TUPE process.</p> <p>If Option 2 or Option 3 is pursued, any corresponding impacts will have to be considered as part of any service changes necessary to implement the same.</p>
Disability			x	<p>Irrespective of which Option is pursued there would be a neutral impact on any protected characteristic – in all cases there would be no change to service provision envisaged. The Council would consider all Equality Act 2020 implications as part of decision making. If Option 1 is pursued, any issues in respect of staff of Celtic Leisure will be included as part of any TUPE consultation and will be factored into the TUPE process.</p> <p>If Option 2 or Option 3 is pursued, any corresponding impacts will have to be considered as part of any service changes necessary to implement the same.</p>

Gender reassignment			x	<p>Irrespective of which Option is pursued there would be a neutral impact on any protected characteristic – in all cases there would be no change to service provision envisaged. The Council would consider all Equality Act 2020 implications as part of decision making. If Option 1 is pursued, any issues in respect of staff of Celtic Leisure will be included as part of any TUPE consultation and will be factored into the TUPE process.</p> <p>If Option 2 or Option 3 is pursued, any corresponding impacts will have to be considered as part of any service changes necessary to implement the same.</p>
Marriage & civil partnership			x	<p>Irrespective of which Option is pursued there would be a neutral impact on any protected characteristic – in all cases there would be no change to service provision envisaged. The Council would consider all Equality Act 2020 implications as part of decision making. If Option 1 is pursued, any issues in respect of staff of Celtic Leisure will be included as part of any TUPE consultation and will be factored into the TUPE process.</p> <p>If Option 2 or Option 3 is pursued, any corresponding impacts will have to be considered as part of any service changes necessary to implement the same.</p>
Pregnancy and maternity			x	<p>Irrespective of which Option is pursued there would be a neutral impact on any protected characteristic – in all cases there would be no change to service provision envisaged. The Council would consider all Equality Act 2020 implications as part of decision making. If Option 1 is pursued, any issues in respect of staff of Celtic Leisure will be included as part of any TUPE consultation and will be factored into the TUPE process.</p> <p>If Option 2 or Option 3 is pursued, any corresponding impacts will have to be considered as part of any service changes necessary to implement the same.</p>
Race			x	<p>Irrespective of which Option is pursued there would be a neutral impact on any protected characteristic – in all cases there would be no change to service provision envisaged. The Council would consider all Equality Act 2020 implications as part of decision making. If Option 1 is pursued, any issues in respect of staff of Celtic Leisure will be included as part of any TUPE consultation and will be factored into the TUPE process.</p>



				<p>If Option 2 or Option 3 is pursued, any corresponding impacts will have to be considered as part of any service changes necessary to implement the same.</p>
Religion or belief			x	<p>Irrespective of which Option is pursued there would be a neutral impact on any protected characteristic – in all cases there would be no change to service provision envisaged. The Council would consider all Equality Act 2020 implications as part of decision making. If Option 1 is pursued, any issues in respect of staff of Celtic Leisure will be included as part of any TUPE consultation and will be factored into the TUPE process.</p> <p>If Option 2 or Option 3 is pursued, any corresponding impacts will have to be considered as part of any service changes necessary to implement the same.</p>
Sex			x	<p>Irrespective of which Option is pursued there would be a neutral impact on any protected characteristic – in all cases there would be no change to service provision envisaged. The Council would consider all Equality Act 2020 implications as part of decision making. If Option 1 is pursued, any issues in respect of staff of Celtic Leisure will be included as part of any TUPE consultation and will be factored into the TUPE process.</p> <p>If Option 2 or Option 3 is pursued, any corresponding impacts will have to be considered as part of any service changes necessary to implement the same.</p>
Sexual orientation			x	<p>Irrespective of which Option is pursued there would be a neutral impact on any protected characteristic – in all cases there would be no change to service provision envisaged. The Council would consider all Equality Act 2020 implications as part of decision making. If Option 1 is pursued, any issues in respect of staff of Celtic Leisure will be included as part of any TUPE consultation and will be factored into the TUPE process.</p> <p>If Option 2 or Option 3 is pursued, any corresponding impacts will have to be considered as part of any service changes necessary to implement the same.</p>

**What action will be taken to improve positive or mitigate negative impacts?**

If Option 2 or 3 is pursued, Celtic Leisure are under continued obligations to set out within their business plan how they will work with the Council to achieve the Council's strategic outcomes and address the service outcomes as set out in the output specification. However, if Option 1 is considered, the Council would have control over all of these elements and will set it in line with Council policies.

None of the Options impact on the protected characteristics.

Celtic Leisure will be required to work closely with the council to promote healthy lifestyles, and access to leisure especially through the National Exercise Referral scheme. This will be reported through the annual reporting mechanism.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation			x	<p>If Options 2 or 3 Celtic Leisure will be required to deliver the services in accordance with the aims of The Wellbeing of Future Generations (Wales) Act 2015 through the delivery of wider social, economic and environmental benefits. Celtic leisure will also be required to comply with the requirements of the Equality Act 2010 and the Welsh language standards.</p> <p>Celtic Leisure will be required to work closely with the Local Authority and other partners such as education and training providers to develop specific initiatives, which offer realistic and sustainable employment opportunities to disadvantaged people in the Council Area.</p> <p>Celtic Leisure would ensure the Services are fully inclusive to all sections of the community and shall proactively work to eliminate barriers to participation in sport and physical activity through programming, pricing, policies, development plans, marketing and training, working with the Local Authority and other partners to provide diversionary activities designed to</p>

			<p>help reduce levels of crime, disorder and anti-social behaviour by people in the Neath Port Talbot area.</p> <p>If Option 1 was pursued, then all actions would be considered in line with Council policies and processes.</p>
To advance equality of opportunity between different groups		x	<p>If Options 2 or 3 Celtic Leisure will be required to deliver the services in accordance with the aims of The Wellbeing of Future Generations (Wales) Act 2015 through the delivery of wider social, economic and environmental benefits. Celtic leisure will also be required to comply with the requirements of the Equality Act 2010 and the Welsh language standards.</p> <p>Celtic Leisure will be required to work closely with the Local Authority and other partners such as education and training providers to develop specific initiatives, which offer realistic and sustainable employment opportunities to disadvantaged people in the Council Area.</p> <p>Celtic Leisure would ensure the Services are fully inclusive to all sections of the community and shall proactively work to eliminate barriers to participation in sport and physical activity through programming, pricing, policies, development plans, marketing and training, working with the Local Authority and other partners to provide diversionary activities designed to help reduce levels of crime, disorder and anti-social behaviour by people in the Neath Port Talbot area.</p> <p>If Option 1 was pursued, then all actions would be considered in line with Council policies and processes.</p>
To foster good relations between different groups		x	<p>If Options 2 or 3 Celtic Leisure will be required to deliver the services in accordance with the aims of The Wellbeing of Future Generations (Wales) Act 2015 through the delivery of wider social, economic and environmental benefits. Celtic leisure will also be required to comply with the requirements of the Equality Act 2010 and the Welsh language standards.</p> <p>Celtic Leisure will be required to work closely with the Local Authority and other partners such as education and training providers to develop specific initiatives, which offer realistic and sustainable employment opportunities to disadvantaged people in the Council Area.</p> <p>Celtic Leisure would ensure the Services are fully inclusive to all sections of the community and shall proactively work to eliminate barriers to participation in sport and physical activity through programming, pricing, policies, development plans, marketing and training, working with the Local Authority and other partners to provide diversionary activities designed to</p>

				<p>help reduce levels of crime, disorder and anti-social behaviour by people in the Neath Port Talbot area.</p> <p>If Option 1 was pursued, then all actions would be considered in line with Council policies and processes.</p>
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**What action will be taken to improve positive or mitigate negative impacts?**

Celtic Leisure will be required to work closely with the council to promote healthy lifestyles, and access to leisure especially through the National Exercise Referral scheme. This will be reported through the annual reporting mechanism.

If Option 1 was considered the Council will have control and will consider the same in line with all other corporate policies.

**4. Socio Economic Duty**

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	
Negative/Disadvantage	The Council could choose to offer its leisure facilities at a lower cost as a way to boost access to leisure facilities for those on lower incomes but this would increase an already substantial subsidy. Celtic Leisure already offer a passport to leisure scheme and participate in the free swimming programme. There are also other schemes targeted at increasing participation for low income groups delivered through the PASS team for children in particular.
Neutral	Whether the indoor leisure services remain contracted or comes into the Council has little bearing on the socio economic duty. If any changes are required to service delivery this will be considered as part of any future reports and future integrated impact assessments.

**What action will be taken to reduce inequality of outcome**

N/A

**5. Community Cohesion/Social Exclusion/Poverty**

	+	-	+/-	Why will it have this impact?
Community Cohesion			x	<p>If Options 2&amp;3 are pursued, Celtic Leisure shall ensure the Services are fully inclusive to all sections of the community and shall proactively work to eliminate barriers to participation in sport and physical activity through programming, pricing, policies, development plans, marketing and training.</p> <p>Passport to Leisure and Concessionary prices, which are offered will need to be approved annually by the Council.</p> <p>If Option 1 was considered the Council will have control and will consider the same in line with all other corporate policies.</p>
Social Exclusion			x	<p>If Options 2&amp;3 are pursued, Celtic Leisure shall ensure the Services are fully inclusive to all sections of the community and shall proactively work to eliminate barriers to participation in sport and physical activity through programming, pricing, policies, development plans, marketing and training.</p> <p>Passport to Leisure and Concessionary prices, which are offered will need to be approved annually by the Council.</p> <p>If Option 1 was considered the Council will have control and will consider the same in line with all other corporate policies.</p>
Poverty			x	<p>If Options 2&amp;3 are pursued, Celtic Leisure shall ensure the Services are fully inclusive to all sections of the community and shall proactively work to eliminate barriers to participation in sport and physical activity through programming, pricing, policies, development plans, marketing and training.</p>

				<p>Passport to Leisure and Concessionary prices, which are offered will need to be approved annually by the Council.</p> <p>If Option 1 was considered the Council will have control and will consider the same in line with all other corporate policies.</p>
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**What action will be taken to improve positive or mitigate negative impacts?**

If Options 2& 3 are pursued, the Output Specification for Celtic Leisure will reflect the wellbeing objectives of the corporate plan which has been developed to deliver the Health and Wellbeing of Future Generations Act. The Corporate Plan sets out 4 core wellbeing objectives which it is expected the leisure services should deliver against.

If Option 1 was considered the Council will have control and will consider the same in line with all other corporate policies.

**6. Welsh**

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: - people's opportunities to use the Welsh language			x	The proposal has no impact on the ability to restrict people's opportunities to use the Welsh language as the service specification will not be changing. The design of all signs will take into account guidelines on bilingual design as issued by the Welsh Language Commissioner, and be equal in terms of format, size, quality, legibility and prominence.
- treating the Welsh and English languages equally			x	At no time will the Council be treating the Welsh language no less favourable than English as the service specification will not be changing. The specification requires a service of equal standing to Welsh and English speakers. All marketing literature will be fully bilingual.

**What action will be taken to improve positive or mitigate negative impacts?**

**Welsh Language:**

If Options 2 & 3 are considered, the contract/ Output specification, requires Celtic Leisure, to comply with the Welsh Language Standards 2016.

If Option 1 was considered the Council will have control and will consider the same in line with all other corporate policies.

**7. Biodiversity**

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

<b>Biodiversity Duty</b>	<b>+</b>	<b>-</b>	<b>+/-</b>	<b>Why will it have this impact?</b>
To maintain and enhance biodiversity				There will no impact on the ability to maintain and enhance biodiversity as the service specification will not be changing
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.				The Council is committed to responsible environmental and energy management and the efficient use of energy throughout its operations. It also recognises that good environmental and energy management helps to protect the environment by conserving natural resources and reducing harmful emissions.

**What action will be taken to improve positive or mitigate negative impacts?**

Responsibility for the buildings fabric is retained by the Council whichever Option is agreed & the current programme of energy reduction would be continued.

## 8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
<p>i. <b>Long term</b> – looking at least 10 years (and up to 25 years) ahead</p>	<p>The Options being presented are only for a period of 5 years. And method of delivery for indoor leisure will need to be reviewed again before the end of that 5 year period.</p> <p>All Options will ensure the service benefits from significant investment making them more sustainable in the future and more cost effective.</p> <p>All Options will require investment in staff , particularly in some of the harder to recruit to posts like swimming teachers.</p> <p>Option 2 is the most cost effective and is best placed to protect the service from future financial cuts.</p>
<p>ii. <b>Prevention</b> – preventing problems occurring or getting worse</p>	<p>All Options will ensure the service benefits from significant investment making them more sustainable in the future and more cost effective.</p> <p>All Options will require investment in staff , particularly in some of the harder to recruit to posts like swimming teachers.</p> <p>Option 2 is the most cost effective and is best placed to protect the service from future financial cuts</p>
<p>iii. <b>Collaboration</b> – working with other services internal or external</p>	<p>As indicated above, no formal consultation was required for the existing determination but if Options 1 is pursued consultation will take place with staff members impacted by any proposals pursuant to TUPE.</p> <p>The working group challenged the costs of insourcing, particularly the pension and weekend working estimates. These were both reworked with the group accepting the methodology. The pensions costs were reduced by approximately 10% but with 213 staff in the NEST pension scheme compared to 78 in the Local Government Pension scheme the employers contributions of circa 22.4% mean the costs are unaffordable standing at an additional £880k per annum</p>



	<p>The group also looked at weekend working enhancements and particularly if there is any flexibility and whether this should be offered across Celtic Leisure for all staff or just permanent employees. After detailed analysis the financial savings from both of these were negligible and would be at risk of being in breach of legislative and policy, with the creation of a two tier workforce. The working group also looked at the salaries of staff working across similar leisure providers in South Wales and found these were broadly comparable to what Celtic Leisure are currently offering.</p>
<p>iv. <b>Involvement</b> – involving people, ensuring they reflect the diversity of the population</p>	<p>Partnership working is essential to ensure communities, local groups and club needs can be met and key outcomes understood. Celtic Leisure is required to host club meetings/public forums at least 6 monthly. Their focus will:</p> <ul style="list-style-type: none"> <li>• identifying a key club contact in each organisation, agreeing regular communication and drop-in sessions – e.g. Celtic Dolphins, football, martial arts, canoe etc</li> <li>• provide links from the Centre web site to the Club sites</li> <li>• invite the clubs to contribute their views regarding the running of the facilities and proposed changes to the facilities through meet the manager sessions</li> </ul> <p>As indicated above, no formal consultation was required for the existing determination but if Options 1 is pursued consultation will take place with staff members impacted by any proposals pursuant to TUPE.</p> <p>The working group challenged the costs of insourcing, particularly the pension and weekend working estimates. These were both reworked with the group accepting the methodology. The pensions costs were reduced by approximately 10% but with 213 staff in the NEST pension scheme compared to 78 in the Local Government Pension scheme the employers contributions of circa 22.4% mean the costs are unaffordable standing at an additional £880k per annum</p> <p>The group also looked at weekend working enhancements and particularly if there is any flexibility and whether this should be offered across Celtic Leisure for all staff or just permanent employees. After detailed analysis the financial savings from both of these were negligible and would be at risk of being in breach of legislative and policy, with the creation of a two tier workforce. The working group also looked at the salaries of staff working across similar leisure providers in South Wales and found these were broadly comparable to what Celtic Leisure are currently offering.</p>
<p>v. <b>Integration</b> – making connections to maximise contribution to:</p>	

<p><b>Council's well-being objectives</b></p>	<p>The Corporate plan covers the period 2022 to 2027 and sets out how the council will approach recovery from the Covid-19 pandemic in the short, medium and longer term. It summarises the context in which it has been developed and sets out the council's strategic change programme for the next five years which has four well-being objectives:</p> <ul style="list-style-type: none"> <li>• WBO1: All children get the best start in life.</li> <li>• WBO2: All communities are thriving and sustainable.</li> <li>• WBO 3: Our local environment, culture and heritage can be enjoyed by future generations.</li> <li>• WBO4: Local people are skilled and access high quality, green jobs.</li> </ul> <p>All Options contribute significantly to WBO1, 2 &amp;3 and ensure the service benefits from significant investment making them more sustainable in the future and more cost effective.</p> <p>If the service was brought in house as per Option 1 it is arguable that it would be easier to align the service objectives to those of the wider Council and would therefore make more of an impact on the wider council objectives.</p> <p>Option 2 is the most cost effective and is best placed to protect the service from future financial cuts</p>
<p><b>Other public bodies objectives</b></p>	<p>If Options 2 &amp; 3 are pursued, Celtic Leisure will deliver the services in accordance with the aims of The Wellbeing of Future Generations (Wales) Act 2015 through the delivery of wider social, economic and environmental benefits. Celtic Leisure shall work closely with the Council and other partners such as education and training providers to develop specific initiatives, which offer realistic and sustainable employment opportunities to disadvantaged people in the Local Authority Area.</p> <p>If Option 1 was considered the Council will have control and will consider the same in line with all other corporate policies.</p>

## 9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

If Option 1 was considered the Council will have control and will consider the same in line with all other corporate policies and performance management framework.

For Options 2 &3 the CEO of Celtic Leisure will be required to bring an annual report to members for scrutiny.

## 10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	<b>Conclusion</b>
<b>Equalities</b>	<p>If Option 2 or 3 is pursued, Celtic Leisure are under continued obligations to set out within their business plan how they will work with the Council to achieve the Council’s strategic outcomes and address the service outcomes as set out in the output specification. However, if Option 1 is considered, the Council would have control over all of these elements and will set it in line with Council policies.</p> <p>None of the Options impact on the protected characteristics.</p> <p>Celtic Leisure will be required to work closely with the council to promote healthy lifestyles, and access to leisure especially through the National Exercise Referral scheme. This will be reported through the annual reporting mechanism.</p>
<b>Socio Economic Disadvantage</b>	There is no impact.

<b>Community Cohesion/ Social Exclusion/Poverty</b>	<p>If Options 2&amp; 3 are pursued, the Output Specification for Celtic Leisure will reflect the wellbeing objectives of the corporate plan which has been developed to deliver the Health and Wellbeing of Future Generations Act. The Corporate Plan sets out 4 core wellbeing objectives which it is expected the leisure services should deliver against.</p> <p>If Option 1 was considered the Council will have control and will consider the same in line with all other corporate policies.</p>
<b>Welsh</b>	<p>If Options 2 &amp; 3 are considered, the contract/ Output specification, requires Celtic Leisure, to comply with the Welsh Language Standards 2016.</p> <p>If Option 1 was considered the Council will have control and will consider the same in line with all other corporate policies.</p>
<b>Biodiversity</b>	<p>Responsibility for the buildings fabric is retained by the Council whichever Option is agreed &amp; the current programme of energy reduction would be continued.</p>
<b>Well-being of Future Generations</b>	<p>All Options contribute significantly to WBO1, 2 &amp;3 and ensure the service benefits from significant investment making them more sustainable in the future and more cost effective.</p> <p>If the service was brought in house as per Option 1 it is arguable that it would be easier to align the service objectives to those of the wider Council and would therefore make more of an impact on the wider council objectives.</p> <p>Option 2 is the most cost effective and is best placed to protect the service from future financial cuts</p>

### Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised x
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

Continue as planned as no problems have been identified, and all opportunities to improve have been maximised. There would be no reduction in the facilities currently available.

Option 1. If this Option is considered the Council will have control and will consider the same in line with all other corporate policies and performance management framework.

Option 2 & 3 . If this Option is considered Celtic Leisure will work in line with the operational specification. They will present annually to the council their annual report.

## 11. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Ensure a programme of reporting is put in place	Head of service	Annually	Annual report presented for scrutiny.
If Option 1 is pursued, the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) will apply.	Celtic Leisure	When the decision is made on the delivery model.	Safe and efficient transfer of staff.

**12. Sign off**

	<b>Name</b>	<b>Position</b>	<b>Signature</b>	<b>Date</b>
<b>Signed off by</b>	<b>C Saunders</b>	<b>Head of Service/Director</b>		<b>03/09/2024</b>



Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## Report of the Head of Legal and Democratic Services

### *Name and date of Meeting*

### ACCESS TO MEETINGS/EXCLUSION OF THE PUBLIC

<b>Purpose:</b>	To consider whether the Public should be excluded from the following items of business.
<b>Item (s):</b>	<p>Item 22 -Future Provision of Indoor Leisure Services</p> <p>Item 23 – Freeports Business Case</p> <p>Item 24 - Initial Business Case for the Development of a Triage Centre</p> <p>Item 25 - Debt Write Offs</p> <p>Item 26 - Proposed Agreement for Lease, Unit 4, Neath</p> <p>Item 27 - Proposed Lease, Courtyard at Margam Country Park</p> <p>Item 28 - Proposed Renewal of Lease, Retail Premises Neath</p>
<b>Recommendation(s):</b>	That the public be excluded from the meeting during consideration of the following item(s) of business on the grounds that it/they involve(s) the likely disclosure of exempt information as set out in the Paragraphs listed below of Schedule 12A of the Local Government Act 1972 as amended by the Local Government (Access to Information) (Variation) (Wales) Order 2007 subject to the Public Interest Test (where appropriate) being applied.
<b>Relevant Paragraph(s):</b>	14

## **1. Purpose of Report**

To enable Members to consider whether the public should be excluded from the meeting in relation to the item(s) listed above.

Section 100A (4) of the Local Government Act 1972 as amended by the Local Government (Access to Information) (Variation) (Wales) Order 2007, allows a Principal Council to pass a resolution excluding the public from a meeting during an item of business.

Such a resolution is dependant on whether it is likely, in view of the nature of the business to be transacted or the nature of the proceedings that if members of the public were present during that item there would be disclosure to them of exempt information, as defined in section 100I of the Local Government Act 1972.

## **2. Exclusion of the Public/Public Interest Test**

In order to comply with the above mentioned legislation, Members will be requested to exclude the public from the meeting during consideration of the item(s) of business identified in the recommendation(s) to the report on the grounds that it/they involve(s) the likely disclosure of exempt information as set out in the Exclusion Paragraphs of Schedule 12A of the Local Government Act 1972 as amended by the Local Government (Access to Information) (Variation) (Wales) Order 2007.

Information which falls within paragraphs 12 to 15, 17 and 18 of Schedule 12A of the Local Government Act 1972 as amended is exempt information if and so long as in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

The specific Exclusion Paragraphs and the Public Interest Tests to be applied are listed in Appendix A.



Where paragraph 16 of the Schedule 12A applies there is no public interest test. Members are able to consider whether they wish to waive their legal privilege in the information, however, given that this may place the Council in a position of risk, it is not something that should be done as a matter of routine.

**3. Financial Implications**

Not applicable

**4. Integrated Impact Assessment**

Not applicable

**5. Valleys Communities Impact**

Not applicable

**6. Workforce Impact**

Not applicable.

**7. Legal Implications**

The legislative provisions are set out in the report.

Members must consider with regard to each item of business the following matters.

- (a) Whether in relation to that item of business the information is capable of being exempt information, because it falls into one of the paragraphs set out in Schedule 12A of the Local Government Act 1972 as amended and reproduced in Appendix A to this report.

and either

- (b) If the information does fall within one or more of paragraphs 12 to 15, 17 and 18 of Schedule 12A of the Local Government Act 1972 as amended, the public interest test in maintaining the exemption outweighs the public interest in disclosing the information; or
- (c) if the information falls within the paragraph 16 of Schedule 12A of the Local Government Act 1972 in considering whether to exclude the public members are not required to apply the public interest test by must consider whether they wish to waive their privilege in relation to that item for any reason.

**8. Risk Management**

To allow Members to consider risk associated with exempt information.

**9. Recommendation(s)**

As detailed at the start of the report.

**10. Reason for Proposed Decision(s):**

To ensure that all items are considered in the appropriate manner.

**11. Implementation of Decision(s):**

The decision(s) will be implemented immediately.

**12. List of Background Papers:**

Schedule 12A of the Local Government Act 1972

**13. Appendices:**

Appendix A – List of Exemptions

## Appendix A

<b>NO</b>	<b>Relevant Paragraphs in Schedule 12A</b>
<b>12</b>	Information relating to a particular individual
<b>13</b>	Information which is likely to reveal the identity of an individual
<b>14</b>	Information relating to the financial or business affairs of any particular person (including the authority holding that information).
<b>15</b>	Information relating to any consultations or negotiations, or contemplated consultations or negotiations in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority
<b>16</b>	Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
<b>17</b>	Information which reveals that the authority proposes: <ul style="list-style-type: none"> <li>• To give under any enactment a notice under or by virtue of which requirements are imposed on a person, or</li> <li>• To make an order or direction under any enactment.</li> </ul>
<b>18</b>	Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

By virtue of paragraph(s) 14 of Part 4 of Schedule 12A  
of the Local Government Act 1972.

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